



January 4, 2023

**VIA EMAIL**

Executive Office of Governor Ron DeSantis  
Attn: Office of Open Government  
400 S. Monroe Street, Suite 209  
Tallahassee, FL 32399  
[Desantis.opengov@eog.myflorida.com](mailto:Desantis.opengov@eog.myflorida.com)

**Re: Public Records Request**

Dear Public Records Officer:

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida's public records laws, as codified at Fla. Stat. Chapter 119, American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that your office promptly produce the following:

1. Any final policy documents written or co-written by Senior Advisor for Public Safety Larry Keefe.
2. Records reflecting all reimbursable and non-reimbursable expenses and costs incurred by Senior Advisor for Public Safety Larry Keefe related to all in-state or out-of-state trips taken by Mr. Keefe.

To the extent your office has aggregated records sufficient to show all relevant expenses and costs, such as spreadsheets, American Oversight would accept production of such records as sufficient. To the extent your office does not have an aggregated record of these costs, we request records reflecting those costs, such as receipts, invoices, charge card or credit card statements, and reimbursement requests.

Relevant expenses may include, but are not limited to, hotel or other lodging costs; costs for air travel, rental car, or other transportation companies; costs incurred for government transportation; the cost of meals or refreshments; and per diem payments.

Relevant expenses include costs associated with the travel of Larry Keefe, as well as any staff members, family members, or other individuals traveling with him.



3. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Senior Advisor for Public Safety Larry Keefe, or anyone communicating on his behalf, such as an assistant or scheduler, and (b) any of the external entities or individuals listed below, or anyone communicating on behalf of the entities listed below (including, but not limited to, at the listed email addresses and/or domains).

External Entities and/or Individuals:

- a. Federation for American Immigration Reform (fairus.org)
- b. Immigration Reform Law Institute or Attorneys United for a Secure America (irli.org)
- c. Center for Immigration Studies (cis.org)
- d. NumbersUSA (numbersusa.com)
- e. The Remembrance Project (theremembranceproject.org)
- f. Center for Renewing America or Citizens for Renewing America (americarenewing.com or citizensrenewingamerica.com)
- g. Conservative Partnership Institute (conservativepartnership.org)
- h. Kris Kobach ([kkobach@gmail.com](mailto:kkobach@gmail.com) or [kris@kriskobach.com](mailto:kris@kriskobach.com))
- i. Alliance for Free Citizens (allianceforfreecitizens.org)
- j. Former Acting Department of Homeland Security (DHS) Secretary Chad Wolf
- k. America First Policy Institute (americafirstpolicy.com)
- l. Stephen Miller, Gene Hamilton, Russ Vought, or anyone from America First Legal (aflegal.org)
- m. Former Immigrations and Customs Enforcement (ICE) Director Tom Homan
- n. Former Deputy DHS Secretary Ken Cuccinelli ([ktc21968@gmail.com](mailto:ktc21968@gmail.com))
- o. Former Acting DHS General Counsel Chad Mizelle
- p. Former Acting Commissioner of U.S. Customs and Border Protection (CBP) Mark Morgan
- q. Former White House Chief of Staff Mark Meadows
- r. Former Acting United States Attorney General Matthew Whitaker
- s. Former United States Solicitor General Ken Starr
- t. Former United States Senator Jim DeMint
- u. Former United States Attorney General Jeff Sessions
- v. National Border Patrol Council President Brandon Judd
- w. ICE Union President Chris Crane

Please note that American Oversight does not seek, and that this request specifically excludes, the initial mailing of news clips or other mass distribution emails. However, subsequent communications forwarding such emails are responsive to this request. In other words, for example, if Senior Advisor for Public Safety Larry Keefe received a mass-distribution news clip email from one of the specified entities, that initial email would not be responsive to this request. However, if Keefe forwarded that email to another

individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

4. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Senior Advisor for Public Safety Larry Keefe, and (b) anyone communicating from an email address ending in dps.texas.gov or tdem.texas.gov.
5. All calendars or calendar entries for Senior Advisor for Public Safety Larry Keefe, including any calendars maintained on Senior Advisor Keefe's behalf.

We request that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to electronic calendars; we request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used to track or coordinate how Senior Advisor Keefe allocates time on agency business.

The search should include any calendars associated with Senior Advisor Keefe's individual email accounts, as well as any official calendars maintained by or for him, including by administrative assistants or schedulers.

For each item of this request, please provide all responsive records from September 28, 2021, through the date the search is conducted.

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

Please search all locations and systems likely to have responsive records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails or texts conducting government business sent or received on the personal account of the government official constitutes a record for purposes of Florida's public records laws.<sup>1</sup>

In addition, American Oversight insists that your agency use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are**

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<sup>1</sup> *Cf. State v. City of Clearwater*, 863 So. 2d 149, 154 (Fla. 2003) ("The determining factor is the nature of the record, not its physical location.").

**still required; your office may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

## **Conclusion**

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.<sup>2</sup>

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<sup>2</sup> American Oversight currently has approximately 16,000 followers on Facebook and 113,000 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 4, 2023); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 4, 2023).

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Taylor Stoneman at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 848-1319.

Sincerely,

/s/ Taylor Stoneman  
Taylor Stoneman  
on behalf of  
American Oversight