

March 31, 2022

VIA Electronic Delivery

Office of the Attorney General
Public Records Coordinator
1885 N. 3rd St.
Baton Rouge, LA 70802
publicrecords@ag.louisiana.gov
(225) 326-6712

Re: Louisiana Public Records Request

Dear Custodian of Records:

Pursuant to the Louisiana Public Records Law, La. Rev. Stat. tit. 44 § 31 (2004), Democracy Forward Foundation submits this request for records.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorney General of Louisiana, in addition to Attorneys General of Mississippi, Missouri, Montana, and South Carolina.

Taxpayer funds were used to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

This letter calls into question whether the State’s conduct, as it relates to its relationship with media outlets, has been appropriate and whether the letter sent to DirecTV in support of OAN constitutes a suitable use of taxpayer funds. The public deserves to know the full extent of

¹ Letter from Ken Paxton, Att’y Gen. of Tex., et al., to Bill Morrow, CEO DirecTV, LLC, (Mar. 10, 2022), *available at* <https://www.texasattorneygeneral.gov/sites/default/files/global/files/DirecTV%20OAN.pdf>.

² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

communication between the State government and conservative media outlets like OAN and others in order to assess whether the State's conduct is appropriate.

Records Requested

Democracy Forward requests that the Office of the Attorney General produce the following:

1. All communications and other records relating to the March 10th letter led by Attorney General Paxton, signed by Attorney General Landry, to DirecTV CEO Bill Morrow.
2. All communications between Louisiana State elected or appointed officials or employees and those in Mississippi, Missouri, Montana, South Carolina, and Texas relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

The Public Records Law requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. La. Rev. Stat. tit. 44 § 4. In the event that the Office of the Attorney General wishes to deny the right to inspect or obtain a copy of requested records without sending a determination in writing or an estimate of the time necessary for collection and

review, Democracy Forward Foundation may initiate legal proceedings to compel the provision of requested records. *Id.* § 35.

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within three business days as required by title 44 section 32 of the Louisiana Revised Statutes. If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period.

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of the ongoing communication between State officials and conservative media outlets. Indeed, records received by Democracy Forward have previously formed the basis of news reports.³

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018),

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Tatiana Calderón

Tatiana Calderón

Director, Policy and Government Affairs

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

March 31, 2022

VIA Electronic Delivery

Office of the Attorney General
Attn: Opinions and Policy Division
P.O. Box 220
Jackson, Mississippi 39205
openrecords@ago.ms.gov

Re: Mississippi Public Information Act Request

Dear Custodian of Records:

Pursuant to Section 25-61-1, *et seq.*, of the Mississippi Code, this is a request to inspect public records within the possession of the Office of the Attorney General.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorney General of Mississippi, in addition to Attorneys General of Louisiana, Missouri, Montana, and South Carolina.

Taxpayer funds were used to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

This letter calls into question whether the State’s conduct, as it relates to its relationship with media outlets, has been appropriate and whether the letter sent to DirecTV in support of OAN constitutes a suitable use of taxpayer funds. The public deserves to know the full extent of

¹ Letter from Ken Paxton, Att’y Gen. of Tex., et al., to Bill Morrow, CEO DirecTV, LLC, (Mar. 10, 2022), *available at* <https://www.texasattorneygeneral.gov/sites/default/files/global/files/DirecTV%20OAN.pdf>.

² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

communication between the State government and conservative media outlets like OAN and others in order to assess whether the State's conduct is appropriate.

Records Requested

Democracy Forward requests that the Office of the Attorney General produce the following:

1. All communications and other records relating to the March 10th letter led by Attorney General Paxton, signed by Attorney General Fitch, to DirecTV CEO Bill Morrow.
2. All communications between Mississippi State elected or appointed officials or employees and those in Louisiana, Missouri, Montana, South Carolina, and Texas relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

As you know, the Public Record Act allows you seven working days from receipt of this letter to produce the requested records. Miss. Code § 25-61-5(1)(a). If you do not produce the requested records within seven days, then you must provide a written explanation for your failure, and state that the records will be produced no later than 14 working days from receipt of this letter. *Id.* §

25-61-5(1)(b). We calculate your first response to be due on or about April 12, 2022, and your second response (if necessary) to be due on or about April 21, 2022.

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of the communications between State agents and officials and conservative media. Indeed, records received by Democracy Forward have previously formed the basis of news reports.³

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, 'Just answer the question and kill this story': *In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018),

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records, please contact me as soon as possible at foia@democracyforward.org.

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/s/ Tatiana Calderón

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March 31, 2022

VIA Electronic Delivery

Missouri Attorney General's Office
Supreme Court Building
207 W. High St.
P.O. Box 899
Jefferson City, MO 65102
SunshineRequest@ago.mo.gov
(573) 751-3321

Re: Missouri Sunshine Law Request

Dear Custodian of Records:

Pursuant to Section 610.023 *et seq.* of the Missouri Revised Statutes, Democracy Forward Foundation submits this request for records.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorney General of Missouri, in addition to Attorneys General of Louisiana, Mississippi, Montana, and South Carolina.

Taxpayer funds were used to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

This letter calls into question whether the State’s conduct, as it relates to its relationship with media outlets, has been appropriate and whether the letter sent to DirecTV in support of OAN constitutes a suitable use of taxpayer funds. The public deserves to know the full extent of

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² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

communication between the State government and conservative media outlets like OAN and others in order to assess whether the State's conduct is appropriate.

Records Requested

Democracy Forward requests that the Office of the Attorney General produce the following:

1. All communications and other records relating to the March 10th letter led by Attorney General Paxton, signed by Attorney General Schmitt, to DirecTV CEO Bill Morrow.
2. All communications between Missouri State elected or appointed officials or employees and those in Louisiana, Mississippi, Montana, South Carolina, and Texas relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

The Sunshine Law requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. Mo. Rev. Stat. § 610.021. In the event that the Office of the Attorney General wishes to withhold any documents or portions of documents, we request that you provide us with a written statement of the grounds for denying access, citing the specific provision of the law under which the access is denied. *Id.* § 610.023(4).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 3 business days as required by under section 610.023(3) of the Missouri Revised Statutes. If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If access to the requested documents are not granted immediately, please provide us with a detailed explanation for the cause of the delay and an estimate of the earliest time that the record will be available. Mo. Rev. Stat. § 610.023(3).

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request, in accordance with section 610.026(1) of the Missouri Revised Statutes.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of the ongoing communication between State officials and conservative media outlets. Indeed, records received by Democracy Forward have previously formed the basis of news reports.³

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If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records “as soon as possible,” Mo. Rev. Stat. § 610.023(3), please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Tatiana Calderón

Tatiana Calderón

Director, Policy and Government Affairs

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

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Office of the Attorney General
Justice Building, Third Floor
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
contactdoj@mt.gov
(406) 444-2026

Re: Montana Public Information Act Request

Dear Custodian of Records:

Pursuant to Montana’s Public Records Act, Mont. Code Ann. § 2-6-1001 *et seq.*, Democracy Forward Foundation submits this request for records.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorney General of Montana, in addition to Attorneys General of Louisiana, Mississippi, Missouri, and South Carolina.

Taxpayer funds were used to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

This letter calls into question whether the State’s conduct, as it relates to its relationship with media outlets, has been appropriate and whether the letter sent to DirecTV in support of OAN constitutes a suitable use of taxpayer funds. The public deserves to know the full extent of

¹ Letter from Ken Paxton, Att’y Gen. of Tex., et al., to Bill Morrow, CEO DirecTV, LLC, (Mar. 10, 2022), *available at* <https://www.texasattorneygeneral.gov/sites/default/files/global/files/DirecTV%20OAN.pdf>.

² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

communication between the State government and conservative media outlets like OAN and others in order to assess whether the State's conduct is appropriate.

Records Requested

Democracy Forward requests that the Office of the Attorney General produce the following:

1. All communications and other records relating to the March 10th letter led by Attorney General Paxton, signed by Attorney General Knudsen, to DirecTV CEO Bill Morrow.
2. All communications between Montana State elected or appointed officials or employees and those in Louisiana, Mississippi, Missouri, South Carolina, and Texas relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

The Public Records Act requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. Mont. Code Ann. § 2-6-1003. In the event that the Office of the Attorney General wishes to withhold any documents or portions of documents, it must "provide a written explanation" for withholding information. *Id.* § 2-6-1009

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of the ongoing communication between State officials and conservative media outlets. Indeed, records received by Democracy Forward have previously formed the basis of news reports.³

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal*

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Tatiana Calderón

Tatiana Calderón

Director, Policy and Government Affairs

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

Trump appointees' war to end HHS teen pregnancy program, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

March 31, 2022

VIA Electronic Delivery

South Carolina Office of the Attorney General
FOIA Office
P.O. Box 11549
Columbia, SC 29211
FOIA@scag.gov

Re: South Carolina Freedom of Information Act Request

Dear Custodian of Records:

Pursuant to the South Carolina Freedom of Information Act, S.C. Code Ann, § 30-4-10 *et seq.*, Democracy Forward Foundation submits this request for records.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorney General of South Carolina, in addition to Attorneys General of Louisiana, Mississippi, Missouri, and Montana.

Taxpayer funds were used to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

This letter calls into question whether the State’s conduct, as it relates to its relationship with media outlets, has been appropriate and whether the letter sent to DirecTV in support of OAN constitutes a suitable use of taxpayer funds. The public deserves to know the full extent of communication between the State government and conservative media outlets like OAN and others in order to assess whether the State’s conduct is appropriate.

¹ Letter from Ken Paxton, Att’y Gen. of Tex., et al., to Bill Morrow, CEO DirecTV, LLC, (Mar. 10, 2022), *available at* <https://www.texasattorneygeneral.gov/sites/default/files/global/files/DirecTV%20OAN.pdf>.

² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

Records Requested

Democracy Forward requests that the Office of the Attorney General produce the following:

1. All communications and other records relating to the March 10th letter led by Attorney General Paxton, signed by Attorney General Wilson, to DirecTV CEO Bill Morrow.
2. All communications between South Carolina State elected or appointed officials or employees and those in Louisiana, Mississippi, Missouri, Montana, and Texas relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

The South Carolina Freedom of Information Act requires public bodies to disclose records “so that citizens shall be advised of the performance of public officials and of the decisions that are reached in public activity and the formulation of public policy.” S.C. Code Ann. § 30-4-15. Only limited exceptions are provided for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. *Id.* § 30-4-40. In the event that the South Carolina Office of the Attorney General chooses to deny any or all portions of this request, a written statement must be provided containing the reasons for such a denial. *Id.* § 30-4-30(C)

We also reserve the right to initiate legal proceedings for injunctive or declaratory relief if denied the opportunity to inspect the public records requested.

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record. Please respond to this request in writing within 10 business days as required by S.C. Code Ann. § 30-4-30(C). If all of the requested documents are not available within thirty days from the date of the final determination, *id.*, we request that you provide us with all requested documents or portions of documents that are available within that time period.

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request as the information released will “primarily benefit[] the general public.” SC. Code Ann. § 30-4-30(B).

The disclosure of the records sought will contribute significantly to understanding of an issue of profound public importance. Democracy Forward also has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes. Indeed, records received by Democracy Forward have often formed the basis of news reports.³

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, “*Happy to Do It*”: *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump>

Democracy Forward is not filing this request to further any commercial interest, and any information obtained by Democracy Forward as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to issuing a final determination within the 10-day period, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Tatiana Calderón

Tatiana Calderón

Director, Policy and Government Affairs

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

March 31, 2022

VIA Electronic Delivery

Office of the Attorney General
Public Information Coordinator's Office
P.O. Box 12039
Austin, TX 78711
publicrecords@oag.texas.gov

Re: Texas Public Information Act Request

Dear Custodian of Records:

Pursuant to the Texas Public Information Act, Gov't Code § 552.001 *et seq.*, Democracy Forward Foundation submits this request for records.

Background

On March 10, 2022, Texas Attorney General, Ken Paxton, led a letter to Bill Morrow, CEO of DirecTV, LLC, recommending that the private company reconsider its decision to sever ties with One America News (OAN) upon completion of its current agreement and instead renew its contract with OAN.¹ The letter was also signed by the Attorneys General of Mississippi, Louisiana, Missouri, Montana, and South Carolina.

Attorney General Paxton used taxpayer funds to produce and garner support for this letter for the purpose of engaging in and influencing the business decisions of a private corporation. The Attorney General sought to assert “viewpoint discrimination” as grounds for the State’s involvement in the private business matters of DirecTV. At the same time, OAN prominently features its lawsuit against DirecTV and its parent company on its website.²

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¹ Letter from Ken Paxton, Att’y Gen. of Tex., et al., to Bill Morrow, CEO DirecTV, LLC, (Mar. 10, 2022), *available at* <https://www.texasattorneygeneral.gov/sites/default/files/global/files/DirecTV%20OAN.pdf>.

² See One Am. News Network, *OAN Files Lawsuit Against DirecTV, AT&T, and AT&T Chairman William Kennard*, <https://www.oann.com/oan-files-lawsuit-against-directv-att-and-att-chairman-william-kennard/> (last accessed Mar. 31, 2022).

Records Requested

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2. All communications between Texas State elected or appointed officials or employees and those in Mississippi, Louisiana, Missouri, Montana, and South Carolina relating to the letter to DirecTV.
3. All records containing or documenting communications sent to or received by State elected or appointed officials or employees relating to the following media outlets:
 - One America News Network or @oann.com
 - Fox News or @foxnews.com, @foxbusiness.com
 - Breitbart News Network or @breitbart.com
 - Blaze Media or @blazemedia.com
 - CRTV.com or @crtv.com
 - The Blaze or @theblaze.com
 - NewsMax or @newsmax.com
 - Daily Caller or @dailycaller.com or @dailycallernewsfoundation.org
 - Daily Wire or @dailywire.com
 - Sinclair Broadcast Group or @sbgi.net

Scope of Search

In searching for responsive records, please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. However, please exclude publicly available materials such as news clips that mention otherwise responsive search terms, unless the records contain additional discussion or commentary from State employees or contacts at the organizations listed above.

The Public Information Act requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. Tex. Gov't Code § 552.022. In the event that the Office of the Attorney General wishes to withhold any documents or portions of documents, it must ask for a decision from the Attorney General about whether that information is within the exception. Tex. Gov't Code § 552.301(a), *Thomas v. Cornyn*, 71 S.W.3d 473, 480 (Tex. App. – Austin 2002, no pet.). Should the Attorney General find that the documents ought to be withheld, we further

request a written statement from the Office of the Attorney General asserting its wishes to withhold the requested information and a copy of the written communication to the Attorney General asking for a decision on the issue. Tex. Gov't Code § 552.301(d).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 10 business days as required by under the Texas Government Code. Tex. Gov't Code § 552.221(c). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If no decision from the Attorney General is requested and the information required by §§ 552.301(d)–(e-1) is not provided to us within 10 business days, the information we requested is presumed to be subject to public disclosure and must be released. Tex. Gov't Code § 552.302.

Request for Fee Waiver

Democracy Forward requests a waiver of document search, review, and duplication fees associated with processing records for this request, in accordance with Texas Government Code Section 552.267.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of the communication between State agents and conservative media outlets. Indeed, records received by Democracy Forward have previously formed the basis of news reports.³

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba;

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records “without delay,” Tex. Gov’t Code § 522.221(a), please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Tatiana Calderón

Tatiana Calderón

Director, Policy and Government Affairs

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees’ war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.