

July 8, 2021

The Florida Senate
Office of the General Counsel
Attn: Public Records
The Capitol, Suite 302
404 South Monroe Street
Tallahassee, Florida 32399-1100

## Dear Public Records Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") makes this request for records of the Florida Senate pursuant to Article 1, § 24 of the Florida Constitution, § 11.0431 of the Florida Statutes, and Florida Senate Rule 1.48.

Specifically, CREW requests the following records relating to Senate Bill 90 ("SB 90") created on or before April 29, 2021:

- 1. All records discussing the potential effect of any provision of SB 90 on Black voters, Latino voters, other racial or ethnic minority voters, elderly voters, or voters with disabilities, including without limitation the following provisions of SB 90:
  - i. Drop Box Restrictions (SB 90 Section 28)
  - ii. Volunteer Assistance Ban (SB 90 Section 32)
  - iii. Vote-by-Mail Application Restrictions (SB 90 Section 24)
  - iv. Voting Line Relief Restrictions (SB 90 Section 29)
- 2. All records reflecting any analysis, consideration, or determination regarding how SB 90 would serve to prevent purported voter fraud or irregularities, including any evidence or data supporting such analyses.
- 3. All records relating to the legislative procedures by which SB 90 was passed, including without limitation records relating to:
  - i. Requirements or limitations regarding testimony from members of the public on the bill
  - ii. Requirements or limitations regarding legislative debate on the bill
  - iii. Efforts to expedite the legislative process for the bill
- 4. All records relating to the decision to make the bill effective "upon becoming a law" (SB 90 Section 33).
- 5. All records reflecting any communications, meetings, phone calls, or conversations regarding SB 90 or any predecessor version of that bill with

representatives of any non-governmental or private organization, including without limitation the following organizations and individuals:

- i. Heritage Action for America
- ii. Heritage Foundation
- iii. Susan B. Anthony List
- iv. American Principles Project
- v. Tea Party Patriots
- vi. FreedomWorks
- vii. American Legislative Exchange Council (ALEC)
- viii. Family Research Council
  - ix. Honest Elections Project
  - x. State Policy Network
  - xi. Alliance Defending Freedom
- xii. Federalist Society
- xiii. Cleta Mitchell
- xiv. Ken Cuccinelli

Please search for responsive records in the offices of the following senators:

- Senator Dennis Baxley
- Senator Travis Hutson
- Senator Joe Gruters
- Senator Jeff Brandes
- Senator Danny Burgess
- Senator Debbie Mayfield
- Senator Kelli Stargel
- Senator Jennifer Bradley
- Senator Doug Broxson
- Senator George Gainer
- Senator Ileana Garcia
- Senator Ben Albritton
- Senator Aaron Bean
- Senator Manny Diaz, Jr.
- Senator Kathleen Passidomo
- Senator Jim Boyd

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as emails to which the subjects of this request were cc'ed or bcc'ed.

If it is your position that any portion of the requested records is exempt from disclosure, please state the basis of the exemption you contend is applicable. Fla. Stat. § 119.07(1)(e). Please also state in writing and with particularity the reasons for any

conclusion that a record is exempt or confidential. Fla. Stat. § 119.07(1)(f). If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records. Fla. Stat. § 119.07(1)(d).

CREW agrees to pay up to \$100 for copies of the requested records. If copying fees are expected to exceed this amount, or if you anticipate that "extensive use" of information technology resources or extensive clerical or supervisory assistance will be needed to fulfill this request, please contact me at (202) 408-5565 or nsus@citizensforethics.org.

Where possible, please produce records in electronic format. Please send the requested records to me at either <a href="mailto:nsus@citizensforethics.org">nsus@citizensforethics.org</a> or Nikhel Sus, Citizens for Responsibility and Ethics in Washington, 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Please contact me if you have any questions about this request or foresee any problems in fully releasing the requested records.

Thank you for your assistance.

Sincerely,

Nikhel Sus Senior Counsel

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