



March 5, 2024

VIA EMAIL

Ohio Representative Gary Click
77 South High Street
Floor 12
Columbus, OH 43215
rep88@ohiohouse.gov

Re: Public Records Act Request

Dear Public Records Officer(s):

Pursuant to the Ohio Public Records Act (PRA), Ohio Rev. Code § 149.43, and other applicable Ohio law, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following records:

1. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between State Representative Gary Click and the external individuals and entities listed below, including, but not limited to, anyone communicating from the listed email address(es) or an email address ending in the listed domain(s).

External Individuals and Entities:

- a. Michigan State Representative Brad Paquette (BradPaquette@house.mi.gov)
- b. Michigan State Representative Josh Schriver (JoshSchriver@house.mi.gov)
- c. Michigan State Representative Tom Kunse (TomKunse@house.mi.gov)
- d. Michigan State Senator Jonathan Lindsey (senjlindsey@senate.michigan.gov)
- e. Michigan State Senator Lana Theis (senltheis@senate.michigan.gov)
- f. Prisha Mosley
- g. Aaron Baer (aaronbaer@ccv.org) or anyone else communicating from a Center for Christian Virtue email address (ccv.org)
- h. Alliance Defending Freedom (adflegal.org)
- i. America First Legal (aflegal.org or athospr.com)
- j. American Family Association (afa.net)
- k. American Principles Project (americanprinciplesproject.org)
- l. Concerned Women for America (concernedwomen.org or cwfa.org)
- m. Do No Harm (donoharmmedicine.org)



- n. Eagle Forum (eagleforum.org)
- o. Ethics and Public Policy Center (eppc.org)
- p. Family Policy Alliance (familypolicyalliance.com)
- q. Independent Women’s Forum (iwf.org)
- r. Liberty Counsel (lc.org)
- s. Lisa Littman, or anyone communicating from a Genspect email address (genspect.org)
- t. Manhattan Institute (manhattaninstitute.org)
- u. Michael Artigues (martig900@hotmail.com), Quentin Van Meter (kidendo@comcast.net) or anyone communicating from an American College of Pediatricians email address (acpeds.org)
- v. Protect Women Ohio (protectwomenohio.com)
- w. Tony Perkins, or anyone communicating from a Family Research Council email address (frc.org or fraction.org)

Please note that American Oversight does not seek, and that part 1 of this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if Representative Click received a mass-distribution news clip email from an email ending in @ccv.org, that initial email would not be responsive to this request. However, if Representative Click forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by Representative Gary Click containing any of the key terms listed below.

Key Terms:

- i. “assigned at birth”
- ii. “biological sex”
- iii. “gender affirming”
- iv. “gender altering”
- v. “gender identity”
- vi. “gender reassignment”
- vii. “gender transition”
- viii. “gender-affirming”
- ix. “gender-altering”
- x. “Planned Parenthood”
- xi. “puberty blocker”
- xii. “puberty blocking”
- xiii. “puberty-blocking”
- xiv. “sex change”
- xv. “sex reassignment”
- xvi. “sex-change”
- xvii. Dysphoria
- xviii. Hormonal

- xix. Hormone
- xx. LGBT
- xxi. Mutilate
- xxii. Mutilation
- xxiii. Transgender
- xxiv. “SAFE Act”
- xxv. “HB 68”

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited part 2 of this request to emails sent by Representative Click. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both Representative Click’s response to an email containing any of the key terms listed above and the initial received message are responsive to this request and should be produced.

For both parts of this request, please provide all responsive records from December 1, 2023, through the date the request is received.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- 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.¹ If a request is denied in whole, please state specifically why 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 the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located

¹ Ohio Rev. Code § 149.43(B)(1).

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.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. 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 an electronic format by email. Alternatively, please provide responsive material in native format or in PDF 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.com.²

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, please contact Ben Sparks at records@americanoversight.org or (202) 873-1741.

Sincerely,

/s/ Ben Sparks

Ben Sparks
on behalf of
American Oversight

² American Oversight currently has approximately 16,000 followers on Facebook and 111,400 followers on Twitter.com. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Feb. 26, 2024); American Oversight (@weareoversight), Twitter.com, <https://twitter.com/weareoversight> (last visited Feb. 26, 2024).