



February 7, 2024

**VIA EMAIL**

Office of the Iowa Governor  
1007 East Grand Avenue  
Des Moines, IA 50319  
[records@governor.iowa.gov](mailto:records@governor.iowa.gov)

**Re: Public Records Request**

Dear Custodian of Public Records:

Pursuant to the Iowa Public Records Law, Iowa Code, Ch. 22, American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that your office produce the following records promptly, or as soon as feasible:

1. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachment) between (A) the Office of the Governor officials listed below, and (B) any of the external entities or individuals listed below (including, but not limited to, at the specified complete email addresses and/or listed domain names).

**For part 1 of this request, please provide all responsive records from June 15, 2023, through the date the search is conducted.**

**Office of the Governor Officials:**

1. Kim Reynolds, Governor
2. Taryn Frideres, Chief of Staff
3. Molly Severn, Deputy Chief of Staff
4. Annie Hayes, Executive Assistant
5. Clare Kelly, Health Care Policy Advisor
6. Dax Oberreuter, Health Care Policy Advisor
7. Ryan Capps, Senior Advisor

**External Entities and Individuals:**

1. America First Policy Institute ([americafirstpolicy.com](http://americafirstpolicy.com))
2. Bob Vander Plaats ([bobvp13@gmail.com](mailto:bobvp13@gmail.com))
3. Catholic Medical Association ([cathmed.org](http://cathmed.org))
4. Center for Renewing America ([americarenewing.com](http://americarenewing.com))
5. Child and Parental Rights Campaign ([childparentrights.org](http://childparentrights.org))
6. Christian Medical and Dental Associates ([cmda.org](http://cmda.org))



7. Claremont Institute (claremont.org)
  8. Coalition for Life of Iowa (lifeiowa.org)
  9. Focus on the Family (focusonthefamily.com)
  10. Iowa Catholic Conference (iowacatholicconference.org)
  11. Iowa Faith and Freedom Coalition (ffciowa.com)
  12. Iowa Right to Life (iowartl.org)
  13. Moms for Liberty (momsforliberty.org)
  14. Moms for Liberty Linn County (moms4libertylinn.org)
  15. Moms for Liberty Polk County ([moms4libertypolkcounty@gmail.com](mailto:moms4libertypolkcounty@gmail.com) and [m4lpolkcountycochair@gmail.com](mailto:m4lpolkcountycochair@gmail.com))
  16. National Pro-Life Alliance (prolifealliance.com)
  17. National Right to Life Committee (nrlc.org)
  18. Parents of ROGD Kids (parentsofrogdkids.com)
  19. PragerU (prageruniversity.com and prageru.com)
  20. Promise to America's Children (promisetoamericaschildren.org)
  21. Pulse Life Advocates (pulseforlife.org)
  22. Students for Life (studentsforlife.org)
  23. Susan B. Anthony List (sbalist.org and sba-list.org)
  24. Thomas More Society (thomasmoresociety.org)
2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachment) between (A) the Office of the Governor officials listed above in part 1, and (B) any of the external entities or individuals listed below (including, but not limited to, at the specified complete email addresses or listed domain names).

**For part 2 of this request, please provide all responsive records from December 20, 2023, through the date the search is conducted.**

**External Entities and Individuals:**

1. Alliance Defending Freedom (adflegal.org)
2. America First Legal (aflegal.org and athospr.com)
3. American College of Pediatricians (acpeds.org)
4. American Family Association (afa.net)
5. American Principles Project (americanprinciplesproject.org)
6. Bob Vander Plaats, Chuck Hurley, Ryan Benn, Nick Ludema, Denise Bubeck, and anyone communicating on behalf of The Family Leader (thefamilyleader.com)
7. Concerned Women for America (concernedwomen.org and cwfa.org)
8. Do No Harm (donoharmmedicine.org)
9. Eagle Forum (eagleforum.org)
10. Ethics and Public Policy Center (eppc.org)
11. Family Policy Alliance (familypolicyalliance.com)
12. Family Research Council (frc.org and fraction.org)
13. Focus on the Family (focusonthefamily.com)
14. GenSpect (genspect.org)
15. Heritage Foundation (heritage.org and heritageaction.com)
16. Independent Women's Forum (iwf.org)

17. Liberty Counsel (lc.org)
18. Manhattan Institute (manhattaninstitute.org and manhattan.institute)

For all parts of this request, 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 responding to or forwarding such emails are responsive to this request. In other words, for example, if Governor Reynolds received a mass-distribution news clip email from a listed external entity, that initial email would not be responsive to this request. However, if Governor Reynolds responded to or forwarded that email with her own commentary, that subsequent message would be responsive to this request and should be produced.

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.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Public Records Law.<sup>1</sup>
- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the

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<sup>1</sup> See *Linder v. Eckard*, 152 N.W.2d 833, 835 (Iowa 1967) (“It is the nature and purpose of the document, not the place where it is kept, which determines its status” as a public record); *Chapter 22 Frequently Asked Questions*, Iowa Public Information Board, <https://ipib.iowa.gov/faq/if-email-report-or-other-document-composed-received-or-stored-my-personally-owned-electronic> (“If a government official or employee uses privately owned electronic devices or services, such as cell phones, computers, email accounts, smart phones, or such to conduct official government business, then the record generated is a public record.”).

requested records. 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 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. 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.<sup>2</sup>

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

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<sup>2</sup> 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. 21, 2024); American Oversight (@weareoversight), Twitter.com, <https://twitter.com/weareoversight> (last visited Feb. 21, 2024).

understand any part of this request, 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