



March 11, 2025

**VIA EMAIL**

Louisiana Department of Wildlife and Fisheries  
Office of the Secretary  
Public Records Request  
PO Box 98000  
Baton Rouge, LA 70898  
[WLFPublicRecords@wlf.la.gov](mailto:WLFPublicRecords@wlf.la.gov)

**Re: Public Records Law Request**

Dear Records Custodian:

Pursuant to the Louisiana Public Records Law, La. Rev. Stat. Ann. 44:1 et seq., American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that the Louisiana Department of Wildlife and Fisheries produce the following records within three business days:

1. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between Secretary Madison Sheahan, and (b) any of the external entities or individuals listed below (including the listed email addresses and/or domains).

**External Entities and Individuals:**

- i. America First Legal ([aflegal.org](http://aflegal.org))
- ii. America First Policy Institute ([americafirstpolicy.com](http://americafirstpolicy.com))
- iii. American Immigration Control Foundation ([aicfoundation.com](http://aicfoundation.com))
- iv. Border 911 ([border911.com](http://border911.com))
- v. Center for Immigration Studies ([cis.org](http://cis.org))
- vi. Center for Renewing America ([americarenewing.com](http://americarenewing.com))
- vii. Citizens for Renewing America ([citizensrenewingamerica.com](http://citizensrenewingamerica.com))
- viii. Claremont Institute ([claremont.org](http://claremont.org))
- ix. Conservative Partnership Institute ([cpi.org](http://cpi.org), [conservativepartnership.org](http://conservativepartnership.org))
- x. Constitutional Sheriff & Peace Officers Association ([cspoa.org](http://cspoa.org))
- xi. Federation for American Immigration Reform ([fairus.org](http://fairus.org))
- xii. Heritage Foundation ([heritage.org](http://heritage.org), [heritageaction.com](http://heritageaction.com))
- xiii. Immigration Reform Law Institute ([irli.org](http://irli.org))
- xiv. Kristi Noem
- xv. Mark Hall



- xvi. Mark Krikorian
- xvii. NumbersUSA (numbersusa.org)
- xviii. Peter Brimelow ([pbrimelowvdare@protonmail.org](mailto:pbrimelowvdare@protonmail.org))
- xix. Remembrance Project (theremembranceproject.org)
- xx. Richard Mack ([cspoa2011@gmail.com](mailto:cspoa2011@gmail.com), [sheriffmack@hotmail.com](mailto:sheriffmack@hotmail.com), [sheriffmack@protonmail.com](mailto:sheriffmack@protonmail.com))
- xxi. Sam Bushman
- xxii. South Dakota Governor's Office (state.sd.us)
- xxiii. Stephen Miller
- xxiv. Susan "Susie" Wiles
- xxv. Thomas "Tom" Homan
- xxvi. U.S. Customs and Border Protection (cbp.dhs.gov)
- xxvii. U.S. Department of Homeland Security (hq.dhs.gov)
- xxviii. U.S. Immigration and Customs Enforcement (ice.dhs.gov)
- xxix. VDARE ([vdare@protonmail.com](mailto:vdare@protonmail.com), vdare.com)
- xxx. Voice of Citizens Together

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 an official received a mass-distribution news clip email from America First Legal, that initial email would not be responsive to this request. However, if the official forwarded that email to another listed individual with their 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 Secretary Madison Sheahan, and containing any of the key terms listed below.

Key Terms:

- a. Trump
- b. MAGA
- c. Noem
- d. Homan
- e. "Stephen Miller"
- f. "JD Vance"
- g. border
- h. deport
- i. deportation
- j. immigration
- k. immigrant
- l. immigrants
- m. migrant
- n. migrants
- o. alien

- p. aliens
- q. illegals
- r. “national emergency”
- s. CBP
- t. “ICE”<sup>1</sup>
- u. “Project 2025”
- v. P2025

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by the specified individuals. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. This means that both an individual’s response to an email and the initial received message are responsive to this request and should be produced.

**For parts 1-2 of this request, please provide all responsive records from January 1, 2024, through the date the search is conducted.**

- 3. All text messages (including complete text threads or conversations) or messages on messaging platforms (such as Signal, Slack, GChat or Google Hangouts, Lync, Skype, X (formerly Twitter) direct messages, Facebook messages, WhatsApp, Telegram, or Parler) between (a) Secretary Madison Sheahan (b) any of the external individuals listed below.

External Individuals:

- i. Kristi Noem
- ii. Thomas “Tom” Homan
- iii. Caleb Vitello
- iv. Mark Hall

American Oversight is not in a position to provide phone numbers for these individuals. To the extent that the listed officials are unable to provide them, please use their first and last names as search terms. For example, a search for text messages between Madison Sheahan and Kristi Noem would be conducted by searching Sheahan’s text messages using the key terms “Kristi,” “Noem,” and “Kristi Noem.” For Thomas “Tom” Homan, American Oversight only requests that the key term “Homan” be used to identify potentially responsive records.

**For part 3 of this request, please provide all responsive records from November 6, 2024, through the date the search is conducted.**

---

<sup>1</sup> American Oversight does not object to excluding results where “ICE” is the only key term to appear in the record and the term is not in reference to U.S. Immigration and Customs Enforcement.

## Fee Waiver Request

In accordance with La. Rev. Stat. Ann. 44:32(C)(2), American Oversight requests a waiver of fees associated with processing this request for records. A waiver of fees for this request is appropriate, because American Oversight's use of the requested records "will be limited to a public purpose."

This request is made solely for a public purpose. The public has a significant interest in the officials responsible for executing the Trump administration's immigration plans.<sup>2</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including whether officials have connections to anti-immigrant groups in support of mass deportations. American Oversight is committed to transparency and makes the responses agencies provide to public records requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

Furthermore, this request is fundamentally made for non-commercial purposes. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight's financial interest. American Oversight's mission is 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 X (formerly Twitter).<sup>3</sup>

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>4</sup> Examples reflecting this commitment to the public disclosure of documents and the creation of editorial content include the posting of records and analysis related to the organization's investigations into misconduct and corruption in state governments;<sup>5</sup> posting records and analysis of federal and state governments'

---

<sup>2</sup> See, e.g., Ted Hesson, *Top Trump ICE Official is Reassigned as Deportations Lag in First Month*, Reuters (Feb. 21, 2025, 5:24 PM), <https://www.reuters.com/world/us/top-trump-ice-official-is-reassigned-deportations-lag-first-month-2025-02-21/>.

<sup>3</sup> American Oversight currently has approximately 16,000 followers on Facebook and 95,400 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Mar. 6, 2025); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Mar. 6, 2025).

<sup>4</sup> See generally *News*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>5</sup> See generally *State Investigations*, American Oversight, <https://www.americanoversight.org/states>; see, e.g., *State Government Contacts with Voting-Restriction Activists*, American Oversight, <https://www.americanoversight.org/investigation/state-government-contacts-with-voting-restriction-activists>; *Georgia's Voting Machines and Election Security*, American

responses to the Coronavirus pandemic;<sup>6</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the Trump administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>7</sup> and the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department’s process for issuing such waivers.<sup>8</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or X

---

Oversight, <https://www.americanoversight.org/investigation/georgias-voting-machines-and-election-security>.

<sup>6</sup> See, e.g., *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; *Tulsa Health Officials Initially Estimated Trump Rally Would Directly Lead to 2 to 9 Deaths*, American Oversight, <https://www.americanoversight.org/tulsa-health-officials-initially-estimated-trump-rally-would-directly-lead-to-2-to-9-deaths>; *Wisconsin Documents Offer Window into Early Uncertainty over COVID-19*, American Oversight, <https://www.americanoversight.org/wisconsin-documents-offer-window-into-early-uncertainty-over-covid-19>; *In the Documents: Florida Health Department Efforts to Suppress Release of Coronavirus Records*, American Oversight, <https://www.americanoversight.org/in-the-documents-florida-health-department-efforts-to-suppress-release-of-coronavirus-records>.

<sup>7</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Border Wall Investigation Report: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://www.americanoversight.org/border-wall-investigation-report-no-plans-no-funding-no-timeline-no-wall>.

<sup>8</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.americanoversight.org/document/doj-civil-division-response-noel-francisco-compliance>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

(formerly Twitter) direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

- 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. Public business communications conducted on private email accounts and devices are public records subject to the Public Records Law.<sup>9</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 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.

### **Conclusion**

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.

---

<sup>9</sup> La. Atty. Gen. Op. No. 01-155.

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 Danny Martinez at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 897-2465. Also, if American Oversight's request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Danny Martinez  
Danny Martinez  
on behalf of  
American Oversight