



March 20, 2025

VIA EMAIL

Director of Open Government
Florida House of Representatives
402 South Monroe Street
Tallahassee, FL 32399
opengovernment@myfloridahouse.gov

State Representative Berny Jacques
313 House Office Building
402 South Monroe Street
Tallahassee, FL 32399
berny.jacques@myfloridahouse.gov

Re: Public Records Request

Dear Public Records Officer(s):

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida House Rule 14, Part One, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following:

1. Records sufficient to identify all materials (including, but not limited to, reports, analyses, recommendations, or guidance from internal or external entities) upon which State Representative Berny Jacques relied in drafting House Bill 415 (2024).

For part 1 of this request, please provide all responsive records from October 1, 2023, through March 1, 2024.

2. Copies of any impact reports or assessments provided to State Representative Berny Jacques by any direct service provider operating under the Florida Pregnancy Support Services Program.

For part 2 of this request, please provide all responsive records from October 1, 2023, through the date the search is conducted.

3. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) State Representative Berny Jacques or his Legislative Aide Constantine Stanovich, and (b) the external entities and individuals listed



below (including, but not limited to, anyone communicating from an email address ending in the listed domain(s)).

External Entities and Individuals:

- a. Birthright International (birthright.org)
- b. Care Net (care-net.org)
- c. Charlotte Lozier Institute (lozierinstitute.org)
- d. Florida Conference of Catholic Bishops (flaccb.org)
- e. Florida Department of Financial Services (myfloridacfo.com)
- f. Florida Department of Health (floridahealth.gov)
- g. Florida Family Voice (flfamily.org)
- h. Florida Preborn Rescue (floridaprebornrescue.com)
- i. Florida Pregnancy Care Network (myfpcn.com)
- j. Florida Pregnancy Support Services Program (floridapregnancysupport.com)
- k. Florida Right to Life (frtl.org)
- l. Florida Voice for the Unborn (floridavoicefortheunborn.com)
- m. Heartbeat International (heartbeatinternational.org)
- n. Human Coalition (humancoalition.org)
- o. National Institute of Family and Life Advocates (nifla.org)
- p. Office of the Florida Auditor (flauditor.gov)
- q. Pregnancy and Family Resource Alliance (pafrflorida@gmail.com)
- r. Students for Life Action (studentsforlifeaction.org)
- s. Students for Life of America (studentsforlife.org)
- t. Susan B. Anthony Pro-Life America (sbaproflife.org)

Please note that American Oversight does not seek, and that part 3 of this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails are responsive to this request. For example, if a listed official received a mass-distribution news clip email from a listed external entity or individual, that initial email would not be responsive to this request. However, if they forwarded that email with their own commentary, that subsequent message would be responsive to this request and should be produced.

For part 3 of this request, please provide all responsive records from October 1, 2023, through May 31, 2023.

4. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by State Representative Berny Jacques or his Legislative Aide Constantine Stanovich and containing any of the key terms listed below.

Key Terms:

- a. “alternatives to abortion”
- b. “Catholic Charities”
- c. “parenting support”

- d. A2A
- e. FPCN
- f. FPPSSP
- g. Pregnancy
- h. Pregnant

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 4 of its request to emails sent by officials listed above. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. For example, both a listed official's response to an email containing a listed key term and the initial received message are responsive to this request and should be produced.

For part 4 of this request, please provide all responsive records from October 1, 2023, through May 31, 2023.

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

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

In addition, American Oversight insists that your office use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are still required; your office may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

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 it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that 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 your office 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.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, 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 office can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF 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 X (formerly Twitter).¹

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully

¹ American Oversight currently has approximately 16,000 followers on Facebook and 95,300 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Mar. 14, 2025); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Mar. 14, 2025).

releasing the requested records, please contact Danny Martinez at records@americanoversight.org or (202) 897-2465.

Sincerely,

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