AMERICAN OVERSIGHT

June 10, 2025

**VIA EMAIL**

City of Paramount
City Hall
16400 Colorado Ave.
Paramount, CA 90723
Via Online Portal

**Re: Public Records Request**

Dear Public Records Officer:

Pursuant to the California Public Records Act, Cal. Gov't Code §§ 7920.000 et seq., American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that your office produce the following records within ten days:

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

   Paramount Mayor's Office Officials:
   i. Peggy Lemons, Mayor
   ii. Brenda Olmos, Vice Mayor
   iii. Anyone serving as Chief of Staff to the Mayor or Vice Mayor

   Key Terms:
   a. "National Guard"
   b. NG
   c. NGB
   d. "Cal Guard"
   e. "California Guard"
   f. "California Military"
   g. CMD
   h. CNG
   i. "CA ARNG"
   j. CAARNG
   k. Marine
   l. Marines
   m. USMC

n. Trump
o. protest
p. protestor
q. protestors
r. raid
s. raids
t. rebel
u. rebellion
v. insurrection
w. assemblage
x. "Title 10"
y. DOD
z. ICE[1]
aa. anti-ICE
bb. immigration
cc. immigrant
dd. migrant

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 1 of 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.

2. All text messages (including complete text message 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, Mattermost, Wickr, or Parler) sent or received by any of the officials listed above in part 1 and containing any of the following key terms, also listed below.

Key Terms:
a. "National Guard"
b. NG
c. "Cal Guard"
d. Marine
e. Marines
f. Trump
g. protest
h. protestor
i. protestors
j. raid

[1] 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 Immigration and Customs Enforcement.

k. raids
l. rebellion
m. insurrection
n. ICE[2]
o. DOD
p. Defense

For text messages or messages on other messaging platforms, American Oversight requests that full text message threads/conversations be produced. For example, if an official sent or received a text message containing any of the key terms listed above, the complete thread/conversation for the timeframe listed below should be produced, and not just the message containing the key term.

3. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between any of the officials listed above in part 1, and (b) any of the external entities listed below (including the listed domains).

External Entities:
a. California Governor's Office (gov.ca.gov)
b. California Military Department (Cal Guard) (calguard.ca.gov)
c. U.S. Customs and Border Protection (cbp.dhs.gov)
d. U.S. Department of Defense (.mil)
e. U.S. Department of Homeland Security (hq.dhs.gov)
f. U.S. Department of Justice (usdoj.gov)
g. U.S. Immigration and Customs Enforcement (ice.dhs.gov)
h. White House Office (who.eop.gov)

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 the U.S. Department of Defense, 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.

4. All text messages (including complete text message 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, Mattermost, Wickr, WhatsApp, Telegram, or

[2] 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 Immigration and Customs Enforcement.

Parler) between (a) any of the officials listed above in part 1, and (b) any of the external individuals or entities listed below.

External Entities and Individuals:

a. Anyone communicating from the White House Office
b. Anyone communicating from the Department of Homeland Security
c. Anyone communicating from Immigration and Customs Enforcement (ICE)
d. Anyone communicating from the California Governor's Office
e. Anyone communicating from the California Military Department and/or Cal Guard
f. Gavin Newsom
g. Nathan Barankin
h. Thomas "Tom" Homan

American Oversight requests that full text message threads/conversations be produced.

American Oversight is not in a position to provide a phone number for the listed individuals. To the extent that the official is unable to provide them, please use the individuals' names as search terms. For example, a search for text messages between an official and Gavin Newsom would be conducted by searching the official's text messages using the key terms "Gavin," "Newsom," and "Gavin Newsom" to identify potentially responsive records.

**For all parts of this request, please provide all responsive records from June 5, 2025, through the date the search is conducted.**

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

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

- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind.

- 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.

- If any records are withheld in full or in part, please demonstrate that the record(s) in question are exempt under the express provisions of the California Public Records Act or that the public interest served by not disclosing the record(s) clearly outweighs the public interest served by disclosure of the record(s).[3]

- 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.[4] 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 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

[3] Cal. Gov't Code § 7922.000.
[4] Cal. Gov't Code § 7922.525(b).

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).[5]

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 or (202) 897-2465.

Sincerely,

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

[5] American Oversight currently has approximately 16,000 followers on Facebook and 94,600 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited June 10, 2025); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited June 10, 2025).