AMERICAN OVERSIGHT

September 8, 2025

VIA EMAIL

Office of the Attorney General
State of Idaho
Attn: Public Records Custodian
700 W. Jefferson Street, Suite 210
P.O. Box 83720
Boise, ID 83720
kamala.reeve@ag.idaho.gov

Re: Public Records Act Request

Dear Public Records Custodian:

Pursuant to Idaho's Public Records Act, as codified at Chapter 1 of Title 74 of the Idaho Code, I.C. T. 74, Ch. 1, American Oversight makes the following request for records.

Requested Records

Pursuant to Section 74-103(1) of the Idaho Code, American Oversight requests that your agency produce the following records within three working days, or, if a longer period of time is needed and American Oversight is so notified, within ten working days:

1. All formal or informal final directives (including informal email communications), guidance, protocols, or policies created by, issued to, or otherwise provided to your agency regarding the provision of gender-affirming care for minors on or after June 18, 2025.

2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by the officials listed below, or anyone communicating on their behalf, such as an assistant or scheduler, and containing any of the key terms also listed below.

   Office of the Attorney General Officials:
   a. Raúl Labrador, Attorney General
   b. Josh Turner, Acting Solicitor General
   c. Phil Broadbent, Chief Deputy
   d. Phil Skinner, Chief of Staff
   e. Kim White, Executive Assistant
   f. Tom Donovan, Health & Human Services Division Chief

Key Terms:
i. "gender affirming"
ii. "SB 1"
iii. Gender-affirming
iv. SB1
v. Skrmetti
vi. Trans
vii. Transgender

For part 2 of this request, please provide all responsive records from June 1, 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 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. 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.

- 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 Idaho's Public Records Act if they were "prepared" by your agency, including by an employee of your agency.[1]

[1] *See* I.C. § 74-101(13); *cf. Cowles Pub. Co. v. Kootenai Cty. Bd. of Cty. Comm'rs*, 144 Idaho 259, 263 (2007).

- 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.[2] 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 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).[3]

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

[2] I.C. § 74-112.

[3] American Oversight currently has approximately 16,000 followers on Facebook and 94,500 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited Sept. 4, 2025); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited Sept. 4, 2025).

understand any part of this request, please contact David Kronig at records@americanoversight.org or (202) 897-3915.

Sincerely,

/s/ David Kronig
David Kronig
on behalf of
American Oversight