AMERICAN OVERSIGHT

April 10, 2026

VIA EMAIL

Wyoming Secretary of State's Office
2122 W. 25th St.
Herschler Bldg. E.
Ste. 100
Cheyenne, WY 82002
SecOfState@wyo.gov

Re: Public Records Act Request

Dear Public Records Person:

Pursuant to the Wyoming Public Records Act, Wyo. Stat. §§ 16-4-201 *et seq.*, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records within seven business days:[1]

> A complete copy (including any attachments) of all contracts or subcontracts, amendments, inter-governmental service agreements, memoranda of understanding, or other written agreements between the Wyoming Secretary of State's Office and any of the external entities or individuals listed below.
>
> External Entities and Individuals:
> i. John "Rick" Richards
> ii. John W. Richards, Jr.
> iii. John Richards III
> iv. EagleAI NETwork
> v. ELLY
> vi. Psephos
>
> **Please provide all responsive records created or in effect 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 fees.

[1] To the extent the requested records are not available within seven business days, please provide an update at that time. *See* Wyo. Stat. §§ 16-4-202(b), (c)(i). Pursuant to the Wyoming Public Records Act, all records should be released no more than thirty calendar days "unless good cause exists preventing release." *Id.* § 16-4-202(c)(iii).

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 term "record," in its 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.

- 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, please provide a written statement of the grounds for denial and, if applicable, state specifically why it is not reasonable to segregate portions of the record for release.[2]

- 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.

[2] *See* Wyo. Stat. § 16-4-203(e).

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 understand any part of this request, please contact Jessica Jensen at records@americanoversight.org or (276) 293-9853 ext. 1033.

Sincerely,

/s/ Jessica Jensen
Jessica Jensen
on behalf of
American Oversight

[3] American Oversight currently has approximately 16,000 followers on Facebook and 94,700 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited Apr. 7, 2026); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited Apr. 7, 2026).