AMERICAN OVERSIGHT

April 29, 2026

VIA EMAIL

Veterans Service Building, Suite 210
20 W 12th St.
Saint Paul, MN 55155
justin.erickson@state.mn.us

Re: Data Request

Dear Responsible Authority:

Pursuant to the Minnesota Government Data Practices Act, Minnesota Statutes Chapter 13, American Oversight makes the following request for data.

Requested Data

American Oversight requests that the responsible authority or designee produce the following data upon receipt of this request, or as soon as reasonably possible.

Please provide all responsive data from June 1, 2025, through the date the search is conducted.

All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) any of the officials listed below (including anyone communicating on their behalf, such as an assistant or scheduler), and (b) any of the external individuals and entities also listed below (including, but not limited to, anyone communicating from an email address ending in the listed domains).

Secretary of State's Office Officials:

i. Steve Simon, Secretary of State
ii. Julie Strother, Deputy Secretary of State

External Individuals and Entities:

a. Pam Bondi, Attorney General
b. Stuart McComma, Chief of Staff, Department of Justice
c. Todd Blanche, Deputy Attorney General
d. Harmeet Dhillon, Deputy Attorney General
e. Eric Neff, Acting Chief, Voting Rights Section
f. Mac Warner, Principal Deputy Assistant Attorney General, Voting Rights Section
g. Gregory Brown, Deputy Assistant Attorney General, Voting Rights Section
h. Jesus Osete, Deputy Assistant Attorney General, Voting Rights Section
i. Kristi Noem, Secretary, Department of Homeland Security

j. Corey Lewandowski, Special Government Employee, Department of Homeland Security
k. Roman Jankowski, Chief Privacy Officer and Chief Freedom of Information Officer, Department of Homeland Security
l. U.S. Department of Justice Voting Rights Section (voting.section@usdoj.gov)
m. U.S. Department of Justice (@usdoj.gov)
n. U.S Department of Homeland Security (@dhs.gov)

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 Data

In connection with its request for data, American Oversight provides the following guidance regarding the scope of the data sought and the search and processing of data:

- Please search all locations and systems likely to have responsive data, regardless of format, medium, or physical characteristics.

- Our request for data includes any attachments to responsive materials that were enclosed with those materials when they were 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 systems containing data regarding agency business. Do not exclude data 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. Data of official business conducted using unofficial systems or stored outside of official files are subject to the Data Practice Act.[1]

- In the event some portions of the requested data are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested data. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the data for release. Additionally, please identify the specific statutory section, temporary classification, or specific provision of federal law that provides the basis for denying access, in whole or part, to the requested data.[2]

[1] *See, e.g.*, Minn. Dep't of Admin., Advisory Op. 19-003 (Mar. 28, 2019), http://mn.gov/admin/data-practices/opinions/library/index.jsp?id=36-377591 (cell phone call and text data containing government data subject to the Act); Minn. Dep't of Admin., Advisory Op. 12-019 (Dec. 11, 2012), http://mn.gov/admin/data-practices/opinions/library/index.jsp?id=36-267413 (text messages, emails, and letters of public officials acting in their capacity as such are "government data" subject to the Act, even if sent or received on personal devices or at home addresses).
[2] M.S.A. § 13.03, subd. 3(f).

- Please take appropriate steps to ensure that data responsive to this request is not deleted by the agency before the completion of processing for this request. If data potentially responsive to this request is likely to be located on systems where it is 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 this data.

If you have any questions regarding how to construe this request for data or believe that further discussions regarding search and processing would facilitate a more efficient production of data of interest to American Oversight, please do not hesitate to contact American Oversight. 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 data 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

[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. 27, 2026); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited Apr. 27, 2026).

understand any part of this request, please contact Loree Stark at records@americanoversight.org or (304) 913-6114 .

Sincerely,

/s/ Loree Stark
Loree Stark
on behalf of
American Oversight