OPEN RECORDS ACT REQUEST

Oklahoma Office of the Secretary of State

☐ Media ☑ General Public

Information Requested: Please state with specificity the nature of your request, the records you seek, and the applicable time frames.

All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) any of the Oklahoma Secretary of State officials listed below, and (b) any of the external individuals or entities listed below.

Oklahoma Secretary of State Officials : i. Benjamin M. Lepak, Secretary of State , ii. Donelle Harder, Chief of Staff, iii. Tod Wall, Assistant Secretary of State

External Individuals and Entities: i. Harmeet Dhillon (harmeet.dhillon@usdoj.gov), ii. Robert J. Keenan (robert.keenan@usdoj.gov), iii. Andrew Braniff (andrew.braniff@usdoj.gov), iv. Eric Neff (eric.neff@usdoj.gov), v. Brittany E. Bennet (brittany.bennet@usdoj.gov), vi. Christopher Gardner (christopher.gardner@usdoj.gov) vii. James T. Tucker (james.t.tucker@usdoj.gov), viii. Maureen Riordan (maureen.riordan2@usdoj.gov), ix. Michael Gates (michael.gates2@usdoj.gov) x. Paul Hayden (paul.hayden2@usdoj.gov), xi. Timothy Mellet (timothy.f.mellett@usdoj.gov), xii. Scott Laragy (scott.laragy@usdoj.gov)

E-MAIL ADDRESS records@americanoversight.org

Purpose of Request: ☐ Personal ☐ Commercial ☑ Public Interest

Danny Martinez

NAME OF PERSON MAKING REQUEST (Please Print Name)

1030 15th St NW, Ste B255

ADDRESS

Washington, DC 20005

CITY STATE ZIP

2028716540

PHONE FAX

If this is a media request, who are you affiliated with.

/s/ Danny Martinez 5/6/2026

SIGNATURE OF REQUESTOR DATE SIGNED

You will be notified of any applicable fees pursuant to the Oklahoma Open Records Act, 51 O.S. §§ 24A.1 - 24A.30. Do **NOT** send money prior to receiving notification of applicable fees and the exact amount due.

RETURN FORM TO:

completed forms may be submitted via regular mail or email

Oklahoma Office of the Secretary of State
Attn: Open Records Act Request Coordinator
2300 N. Lincoln Blvd, Room 122
Oklahoma City, OK 73105
Phone (405) 521-3912
Email: ExecutiveLegislative@sos.ok.gov

AMERICAN OVERSIGHT

May 7, 2026

VIA EMAIL

Oklahoma Office of the Secretary of State
Attn: Open Records Act Request Coordinator
2300 N. Lincoln Blvd, Room 122
Oklahoma City, OK 73105
ExecutiveLegislative@sos.ok.gov

Re: Open Records Act Request

Dear Records Access Officer:

Pursuant to the Oklahoma Open Records Act, 51 O.S. §§ 24A.1 *et seq.*, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records:

> All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) any of the Oklahoma Secretary of State officials listed below, and (b) any of the external individuals or entities listed below.
>
> Oklahoma Secretary of State Officials
> i. Benjamin M. Lepak, Secretary of State
> ii. Donelle Harder, Chief of Staff
> iii. Tod Wall, Assistant Secretary of State
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> External Individuals and Entities:
> i. Harmeet Dhillon (harmeet.dhillon@usdoj.gov)
> ii. Robert J. Keenan (robert.keenan@usdoj.gov)
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> iv. Eric Neff (eric.neff@usdoj.gov)
> v. Brittany E. Bennet (brittany.bennet@usdoj.gov)
> vi. Christopher Gardner (christopher.gardner@usdoj.gov)
> vii. James T. Tucker (james.t.tucker@usdoj.gov)
> viii. Maureen Riordan (maureen.riordan2@usdoj.gov)
> ix. Michael Gates (michael.gates2@usdoj.gov)
> x. Paul Hayden (paul.hayden2@usdoj.gov)
> xi. Timothy Mellet (timothy.f.mellett@usdoj.gov)
> xii. Scott Laragy (scott.laragy@usdoj.gov)

xiii. U.S. Department of Justice Voting Rights Section (voting.section@usdoj.gov)
xiv. Anyone communicating on behalf of the U.S. Department of Justice (@usdoj.gov)
xv. Kurt Olsen
xvi. Clay Parikh
xvii. Anyone communicating on behalf of the White House (@eop.gov; .eop.gov; @whitehouse.gov)

Please provide all responsive records from September 1, 2025, through the date the search is conducted.

Fee Waiver Request

In accordance with 51 O.S. § 24A.5(4), American Oversight requests that your office charge no search fees in connection with processing this request for records. Release of the requested records "is in the public interest," because American Oversight, in accordance with its organizational mission, makes this request "to determine whether those entrusted with the affairs of the government are honestly, faithfully, and competently performing their duties as public servants."[1] Specifically, the requested records have the potential to shed light on the actions of your agency regarding the DOJ's request for Oklahoma's voter rolls.[2] Records with the potential to shed light on this matter would contribute significantly to public understanding of how public servants are fulfilling their duties, including efforts to safeguard the state's voter rolls.

American Oversight's work is aimed solely at serving the public interest.[3] As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight's financial interest. Rather, American Oversight's mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. Similar to members of the news media, 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).[4] American Oversight has also demonstrated its

[1] 51 O.S. § 24A.5(4).
[2] *See, e.g.*, Spencer Humphrey, *DOJ Sues Oklahoma, Other States Over Refusal to Hand Over Private Voter Data*, KFOR (Feb. 27, 2026, 10:44 AM), https://kfor.com/news/election-headquarters/doj-sues-oklahoma-other-states-over-refusal-to-hand-over-private-voter-data/.
[3] *See* 51 O.S. § 24A.5(4).
[4] 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 May 6, 2026); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited May 6, 2026).

commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.[5]

American Oversight is committed to transparency and makes the responses public bodies provide to public records requests publicly available, and the public's understanding of the government's activities—including whether public servants are honestly, faithfully, and competently performing their duties—would be enhanced through American Oversight's analysis and publication of these records.

Therefore, in accordance with 51 O.S. § 24A.5(4), American Oversight respectfully requests that you limit any copying fees to the reasonable, direct costs of record copying, or mechanical reproduction, if any such costs are incurred.

American Oversight asks that if its request for a fee waiver is denied in whole or in part, that you contact us prior to incurring any costs.

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.
- 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.

[5] *See generally News*, American Oversight, https://www.americanoversight.org/blog; *State Investigations*, American Oversight, https://www.americanoversight.org/states; *see also, e.g.*, *State Government Contacts with Voting-Restriction Activists*, American Oversight, https://www.americanoversight.org/investigation/state-government-contacts-with-voting-restriction-activists; *Georgia's Voting Machines and Election Security*, American Oversight, https://www.americanoversight.org/investigation/georgias-voting-machines-and-election-security; *Tulsa Health Officials Initially Estimated Trump Rally Would Directly Lead to 2 to 9 Deaths*, American Oversight, https://www.americanoversight.org/tulsa-health-officials-initially-estimated-trump-rally-would-directly-lead-to-2-to-9-deaths.

- 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.[6] 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.

Conclusion

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. 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.

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

[6] 51 O.S. § 24A.5(2).