

April 6, 2023

## Via Email Only

Public Records Custodian 111 S. 3rd Avenue, Ste 102 Phoenix, AZ 85003-2281 PRR@risc.maricopa.gov

## **RE:** APRL Request for records regarding Maricopa County's "War Room" whiteboard about dangerous/misinformation

Dear Public Records Custodian:

Pursuant to the Arizona Public Records Law, ARIZ. REV. STAT. § 39.101 et seq. (LexisNexis, LEXIS through 2022 Reg. Sess.), the American Center for Law and Justice (ACLJ)<sup>1</sup> requests your records regarding Maricopa County's "War Room" whiteboard about dangerous/misinformation.

For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is <u>September 8, 2022, through the date of receipt of this Request</u>. All terms used herein have the definitions given by ARIZ. REV. STAT. §§ 39.101, et seq. (LexisNexis, LEXIS through 2022 Reg. Sess.) and subsequent precedent.

The ACLJ requests copies the following records be provided via email:

1. All public records including emails prepared or generated by Jack Sellers that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

<sup>&</sup>lt;sup>1</sup> The ACLJ is a not-for-profit 50l(c) (3) organization dedicated to the defense of constitutional liberties secured by law. The ACLJ regularly monitors governmental activity concerning abortion and works to inform the public of such affairs. The ACLJ and its global affiliated organizations are committed to ensuring governmental accountability and the ongoing viability of freedom and liberty in the United States and around the world.

2. All public records including emails prepared or generated by Thomas Galvin that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

3. All public records including emails prepared or generated by Bill Gates that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

4. All public records including emails prepared or generated by Clint Hickman that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

5. All public records including emails prepared or generated by Steve Gallardo that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

6. All emails or other records prepared or generated by Stephen Richer that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

7. All emails or other records prepared or generated by Juanita Garza that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

8. All emails or other records prepared or generated by Karen Loschiavo that in any way concern the making, maintenance, existence, or use of a list or whiteboard about

"dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

9. All emails or other records prepared or generated by Kristi Passarelli that in any way concern the making, maintenance, existence, or use of a list or whiteboard about "dangerous/misinformation" since September 8, 2022, to the date of processing this request, using the search string: "Whiteboard" or "dangerous/misinformation" or "dangerous" or "war room" or "warroom" or "misinformation" – or any internally used term or acronym for such list or whiteboard.

## **Statement of Purpose**

The ACLJ will disseminate the records requested to the public via multiple media platforms and, as such, the records are requested for news gathering purposes. This information is not being sought for commercial purposes as the records will not be sold nor will any names and addresses be sold or solicited.

If there are any fees for searching or copying these records, please inform the ACLJ if the cost will exceed \$500. However, the ACLJ respectfully requests a waiver of all fees because the disclosure of the requested information is in the public interest.

## **Conclusion**

If this Request is denied in whole or in part, ACLJ requests that, within the time requirements imposed by the APRL, the custodian agency support all denials by reference to specific APRL exemptions and provide any statutorily or judicially required explanatory information.

Thank you for your prompt consideration of this Request. Please furnish all applicable records and direct any responses to:





I affirm that the foregoing request and attached documentation are true and correct to the best of my knowledge and belief.

Respectfully submitted,

Joelan Saklas

Jordan Sekulow Executive Director

Jahn A Monaghan

John A Monaghan Senior Litigation Counsel

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Benjamin P. Sisney Senior Litigation Counsel