

**REQUEST UNDER THE MICHIGAN FREEDOM OF INFORMATION ACT**

January 7, 2020

Christy Wendling-Richards  
FOIA Coordinator  
Department of Attorney General  
P.O. Box 30754  
Lansing, MI 48909

**By Electronic Mail:** AG-FOIA@michigan.gov  
**Re:** Certain Contracts and Billing Records

Dear Ms. Wendling-Richards:

On behalf of the public policy group Energy Policy Advocates (EPA), recognized by the Internal Revenue Service as a non-profit public policy institute under § 501(c)(3) of the Internal Revenue Code, pursuant to the Michigan Freedom of Information Act, MCL §15.231, *et seq.*, I hereby request that you provide copies of the following records: all bills and/or invoices, including e.g., time sheets, submitted to (or through) Susan Bannister and/or Kelly Keenan by Stanley “Skip” Pruss from March 1, 2019 through the date you process this request, inclusive.

We believe any responsive records would typically be submitted around mid-month to the email address [keenank@michigan.gov](mailto:keenank@michigan.gov) and [BannisterS@michigan.gov](mailto:BannisterS@michigan.gov) from [pruss@5lakesenergy.com](mailto:pruss@5lakesenergy.com). Although we seek all records responsive to this request, the above information provides an efficient method for searching such records and we request that any production of those records be provided on a rolling basis.

In addition to the below request for a fee waiver, we note that your office has a [“Track Your Taxes” web page](#) dedicated to posting such information, which it collates in three-month increments. The last entries on this page are from the period ending December 31, 2018. As the

information sought in this request is of the kind that was typically posted online, we request a fee waiver.

We understand that a public body may charge a fee for the cost of the search, examination, review, copying, separation of confidential from nonconfidential information, and mailing costs. If your Office expects to seek a charge associated with the searching, copying or production of these records, please provide an estimate of anticipated costs. Given EPA's non-profit and public interest nature and intention to broadly disseminate relevant findings, EPA requests a waiver or reduction of any applicable fees.

EPA is a non-profit public policy organization dedicated to informing the public of developments in the area of energy and environmental issues and relationships between governmental and non-governmental entities as they relate to those issues. EPA's ability to obtain fee waivers is essential to this work. EPA intends to use any responsive information to continue its work highlighting the nexus between interested non-governmental entities and government agency decision-making. The public is both interested in and entitled to know how regulatory, policy and enforcement decisions are reached. EPA ensures the public is made aware of its work and findings via its partnership with the non-profit public interest law firm Government Accountability & Oversight, P.C., and the [ClimateLitigationWatch.org](http://ClimateLitigationWatch.org) project dedicated to broadly disseminating energy and environmental policy news and developments. The public information obtained by EPA and published on [ClimateLitigationWatch.org](http://ClimateLitigationWatch.org) have been relied

upon by established media outlets, including the Washington Times and Wall Street Journal editorial page.<sup>1</sup>

We look forward to your response. If you have any questions, do not hesitate to contact me by email at [MatthewDHardin@protonmail.com](mailto:MatthewDHardin@protonmail.com).

Sincerely,

Matthew D. Hardin

---

<sup>1</sup> See, e.g., The Editorial Board, “State AGs’ Climate Cover-Up” Wall Street Journal, June 7, 2019, <https://www.wsj.com/articles/state-ags-climate-cover-up-11559945410>. Valerie Richardson, “Motivated or manipulated? Rise of youth climate activism fuels alarms over exploitation” Washington Times, March 15, 2019, <https://www.washingtontimes.com/news/2019/mar/13/youth-climate-strike-sparks-debate-use-students-pr/>, see also “Climate Strike Sparks Debate on Use of Students as Props”, [https://www.realclearpolicy.com/2019/03/15/climate\\_strike\\_sparks\\_debate\\_on\\_use\\_of\\_students\\_as\\_props\\_41180.html](https://www.realclearpolicy.com/2019/03/15/climate_strike_sparks_debate_on_use_of_students_as_props_41180.html). Valerie Richardson, “Democratic AGs team up with George Soros-funded group on anti-Trump lawsuit” Washington Times, August 1, 2019, <https://www.washingtontimes.com/news/2019/aug/1/george-soros-funded-group-democratic-ags-partner-a/>. Anthony Watts, “Emails reveals how children become pawns of climate alarmism”, Watts Up With That (two-time Science Website of the Year), March 13, 2019, <https://wattsupwiththat.com/2019/03/13/emails-reveal-how-children-become-pawns-of-climate-alarmism/>.