

# Missouri Alliance for Freedom

Post Office Box 26777 • Kansas City, Missouri 64196 • [www.missourifreedom.com](http://www.missourifreedom.com)

May 2, 2017

## VIA E-MAIL AND REGULAR MAIL

Nicole Galloway  
Missouri State Auditor  
c/o Mark Henley, Custodian of Records  
P.O. Box 869  
Jefferson City, MO 65102  
[moaudit@auditor.mo.gov](mailto:moaudit@auditor.mo.gov)

### **RE: Sunshine Request re: Audit of Department of Revenue**

Dear Auditor Galloway:

This is a request for records under the Missouri Sunshine Law, Chapter 610, RSMo.

I request that you make available to me all records relating to your audit of the Missouri Department of Revenue; specifically, your audit of the timeliness of the Department's issuance of tax refunds.

This request includes, but is not limited to, the following categories of records:

1. The subpoena you issued to the Department of Revenue on or about April 19, 2017;
2. All records relating to your decision to audit the timeliness of the Department's issuance of tax refunds;

This request includes, but is not limited to: records of communications; meetings; teleconferences; planning; and similar records.

3. All records of communication within the Office of the Auditor relating to the audit of the timeliness of income tax refunds;
4. All records of communication between or among the Office of the Auditor (including any agent thereof) and any other party or parties relating to the audit of the timeliness of tax refund issuance;

In addition, I ask that you provide all records of communications to or from Paul Harper from April 27, 2015 to the present. This request includes, but is not limited to, records relating to the audit of the Department of Revenue. This request includes communications within the Office of the Auditor and communications between and among Harper and other parties. This

request includes records of communications both during and prior to his current employment with the Office of the Auditor.

In addition, I ask that you provide all records of communications to or from Douglas Nelson from April 27, 2015 to the present. This request includes, but is not limited to, records relating to the audit of the Department of Revenue. This request includes communications within the Office of the Auditor and communications between and among Nelson and other parties. This request includes records of communications both during and prior to his current employment with the Office of the Auditor.

In the interest of transparency, I ask that you interpret this request, and all terms herein, as broadly as possible.

The types of records subject to this request include, but are not limited to, internal or external, paper or electronic, draft or final,

1. documents;
2. notes;
3. correspondence;
4. memoranda;
5. letters;
6. email;
7. faxes;
8. spreadsheets;
9. databases;
10. telephone call logs;
11. recordings or notes of telephone conversations;
12. recordings or notes of voicemails;
13. recordings, notes, minutes, or agenda of meetings;
14. text messages;
15. instant messages; and,
16. calendar entries;

sent, received, or maintained by the Office of the Auditor or any employee or agent thereof. Please produce all electronic data in its native format, preserving all metadata.

Please provide your response, and any responsive documents that are immediately available, within five (5) business days.

I respectfully request that you make your production on a rolling basis if necessary. If at least some records can be produced without objection or are clearly responsive, please produce those documents first.

The information I request will be used to inform the public about the way their government works and this request is in the public interest. I request that fees be waived.

If you are unwilling to waive fees, I respectfully request that materials be produced by the most cost-effective means possible, and that a cost estimate be provided prior to production.

Please send responses and communications regarding this request to the following address:

Missouri Alliance for Freedom  
c/o Kristen Blanchard Ansley  
Post Office Box 26777  
Kansas City, Missouri 64196

If you deny any part of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. If there are any portions of this request that you find objectionable for any reason, please notify me in writing of the objections immediately, identifying by date and subject what documents are covered by the objection, and the legal authority for the objection. Please consider each request separately, so that any objection to one request will not unnecessarily delay responses to the remainder of the requests.

Given your commitment to transparency in government, I look forward to your timely response.

Sincerely,

A handwritten signature in black ink, appearing to read 'KBA', with a long horizontal line extending to the right.

Kristen Blanchard Ansley  
President  
Missouri Alliance for Freedom