EXHIBIT C

STATE OF IOWA

KIM REYNOLDS
GOVERNOR

February 28, 2025

VIA E-MAIL ONLY

Thomas D. Story
Legal Counsel
American Civil Liberties Union
Thomas.Story@aclu-ia.org

Re: **Executive Privilege**

Dear Mr. Story:

The Iowa Governor's Office (IGOV) received an Iowa Freedom of Information Act (IFOIA) request from your client, Jason Benell of the Iowa Atheists and Freethinkers, related to records in the possession of IGOV involving the Satanic Temple of Iowa and their request to display various satanic content and images to children on December 14, 2024, at the Iowa State Capitol. This request was assigned the following unique tracking number: **R406**.

I. R406 Record Production

The record production for R406 consisted of 611 pages. IGOV redacted three (3) documents based on attorney-client privilege and/or attorney work product. *See* R406 Batestamp Nos. 1-3, 114, and 609-610; *see also* Iowa Code §§ 227.4(4), 622.11, *Horsfield Materials, Inc. v. City of Dyersville*, 834 N.W.2d 444, 463 (Iowa 2013).

There were seven (7) documents redacted based on executive privilege. *See* R406 Batestamp Nos. 4-7, 9-13, 97-101, 228-231, 496-498, 500-502, and 608). Batestamp Nos. 4-7 consist of an executive agency report prepared for the benefit of the Governor by the cabinet director for the Iowa Department of Administrative Services (DAS). The document provides information and guidance to the Governor related to her executive cabinet agency, which assists the Governor in performing the powers and duties of the executive office. *See generally* Iowa Code §§ 8A-102 –

8A-104, 8A-322. This confidential – or closed – record contains a single line that would be responsive to your client's request. Batestamp No. 608 is a communication from the director of DAS that, although nonresponsive to the R406 request (it is located in between two responsive communications within a text thread), it is also a communication designed to provide high level information and guidance to the Governor and her senior staff related to an executive level cabinet agency.

Each of the remaining documents that were redacted consist of "prep documents" that were prepared for the Governor by her senior staff to assist her in performing the duties and powers of the office. Much of the material on these documents, although privileged, is nonresponsive.

These communications were intended to be confidential, and the disclosure of them would frustrate and inhibit the Governor's ability to receive candid, fulsome, and robust information in the future. Stated differently, the release of this information would interfere with the Governor's ability to perform the powers and duties of the office in the most effective manner for the benefit of Iowans. It is in the public interest that the Governor receives such information when making decisions.

All documents were redacted following a review by the Governor's legal counsel.

II. Open Records

It is important to note at the outset, information in the possession of the government – local, state, and federal – irrespective of whether it is in the possession of the executive, legislative, or judicial branch should *generally* be made available to the public and, equally, it should be accessible amongst the coequal branches of government. It is good public policy to provide the public with access to as much information as possible.

Broad access to government information, however, was not the historical norm in either Iowa or the United States. Rather, such access – and the presumption of openness – is a recent legislative advent. The Freedom of Information Act, commonly known as FOIA, was enacted by Congress in 1966 to give the American public greater access to the federal government's records. *See* Senate Bill 1160 (1966). FOIA was signed into law by President Lyndon B. Johnson on July 4, 1966.[1] In Iowa, Senate File 537 was approved on July 28, 1967, by Governor Harold E. Hughes.[2]

Consequently, FOIA became law 178-years, 9-months, and 17-days after the U.S. Constitution was adopted. And, IFOIA became law 110-years, 4-months, and 25-days after the Iowa Constitution was adopted. The adoption of public record laws – decades before the widespread use of transitory forms of communication – is an important achievement for the American public.

There were widespread issues leading up to this legislation related to government secrecy, which ultimately resulted in the federal government, and numerous states, enacting laws related to public records around the same timeframe. During World War II the country witnessed an immense growth of the federal government coupled with the wartime need for a high degree of secrecy.

---

[1] https://nsarchive2.gwu.edu/nsa/foia/FOIARelease66.pdf
[2] https://www.legis.iowa.gov/legislation/BillBook?ga=62&ba=SF%20537

World War II was followed by the Cold War era. Both the Truman and Eisenhower Administrations responded with many information and security restrictions being placed on government records.

In 1947, President Harry S. Truman signed Executive Order 9834, known as the "Loyalty Order," which directed the attorney general to compile a list of communist organizations and to ferret out communist influence in the federal government.[3] The Loyalty Order allowed for the rise of Senator Josephy McCarthy and the establishment of the House Un-American Activities Committee.[4] A political atmosphere of heightened secrecy and increased suspicion resulted. Americans' distrust of the government during this period was great.

John Moss of California had been the target of disloyalty allegations during his state legislative campaign and subsequent congressional campaign.[5] Moss took office in 1953 as the congressional representative for California's Third Congressional District.[6] He was known to take great issue with the federal government's propensity towards secrecy and he became an advocate for open government.

In 1956 Kent Cooper, the executive director of the Associated Press, popularized the phrase "right to know" in his book by the same name.[7] Cooper wrote: "American newspapers do have the constitutional right to print . . . but they cannot properly serve the people if governments suppress the news."[8]

Editors became so concerned about the denial of information to the press and the public that they commissioned Harold Cross, a leading newspaper lawyer and counsel to the New York Herald Tribune, to prepare a report on federal, state, and local information rights.[9] Cross's report was published in 1953 under the title, "The People's Right to Know."[10] It was funded by American Society of Newspaper Editors.[11]

Ultimately, Congress created a Special Subcommittee on Government Information in 1955, which is known as the "Moss Subcommittee," as it was chaired by John Moss.[12] Every federal agency that testified before the Moss Subcommittee opposed a federal records law that, generally, created a presumption of openness with respect to federal records.[13]

A detailed report on the availability of government records was later issued by the Moss Subcommittee, which noted that Congress was concerned that the threat to freedom of information

---

[3] Hogan, Michael J., A Cross of Iron, p 254 at note 7 (1998) (citing Executive Order No. 9835, 3 C.F.R. Supp. 2 (1947).
[4] $4 Million For Probes, 9 Cong. Q. Almanac 69 (1953).
[5] Interview by Donald B. Seney with John E. Moss, Congressman, U.S. House of Representatives, in Sacramento, Cal., 15 (Oct. 3, 1989), http://archives.cdn.sos.ca.gov/oral-history/pdf/oh-moss-john.pdf.
[6] *Id.*
[7] Foerstel, Herbert N., Freedom of Information and the Right to Know, p. 15 (1999).
[8] *Id.*
[9] *Id.* at 17.
[10] *Id.*
[11] *Id.*
[12] *Id.* at 21.
[13] *See* Federal Public Records Law: Hearing on H.R. 5012 Before the Subcomm. on Foreign Operations and Gov't Info. of the H. Comm. on Gov't Operations, 89th Cong. 1 passim (1965) (statement of Rep. John E. Moss, Chairman, H. Subcomm. on Foreign Operations and Gov't Info).

"is the almost unlimited claim of executive privilege now being made by executive agencies to withhold information from the public, the press and the congress." Editorial, *Executive Privilege*, Des Moines Register (10/26/1959).

The use of this executive privilege during this timeframe covered almost any executive agency record no matter how far removed from the decision-makers and agency heads. Both Congress and, the following year the Iowa General Assembly, each passed legislation which opened up government records to the public. They did provide an exception to these transparency laws for themselves.

Our public record laws were designed to get information that was neither confidential nor privileged to the public, rather than, all information. IGOV values transparency; however, the availability of information is not without limitation. And, the release of such information should not limit the chief executive's ability to either obtain information or detract from the performance of her constitutional duties. The concept of executive privilege predates open record laws, and the legislature does not have the authority to limit the chief executive's constitutional privilege in this regard.

It is unfortunate that the American Civil Liberties Union (ACLU) fails to appreciate the constitutional role of a governor in our three-tiered system of government. The duties, privileges, and powers of a governor are complex, varied, and vast. A governor, the state-level equivalent of the president of the United States, has the greatest responsibility over the affairs of our state and the welfare of its citizenry.

The concept of executive privilege has long been recognized in American jurisprudence, and it is important to review such history in the context of open record laws.

III. Executive Privilege

Executive power is an inherent power within the constitution *irrespective* of whether it is the United States Constitution (for the president) or the Iowa Constitution (for the governor). The ACLU's assertion that executive privilege does not exist in Iowa is misguided. Neither the Iowa Supreme Court nor the Iowa Court of Appeals have *ever* held that there is not an executive privilege in Iowa. Although the judicial branch has not had the occasion to flesh out the contours of such privilege since enactment of IFOIA in 1967, it nonetheless exists.

For perspective, the United States Constitution was signed on September 17, 1787, and ratified by the states between 1787 and 1790. It went into effect in 1789. "Since the beginnings of our nation," recognized the Circuit Court of Appeals for the District of Columbia, "executive officials have claimed a variety of privileges to resist disclosure of information the confidentiality of which they felt was crucial to fulfillment of the unique role and responsibilities of the executive branch of our government." *In re Sealed Case*, 121 F.3d 729, 736 (D.C. Cir. 1997). The most common of these privileges is broadly known as executive privilege.

In 1796, for example, the House of Representative requested information from President George Washington in connection to the Jay Treaty and Great Britian. President Washington refused based

on executive privilege. He noted, "[t]he nature of foreign negotiations requires caution, and their success must often depend on secrecy; and even when brought to a conclusion a full disclosure of all measures, demands, or eventual concessions which may have been proposed or contemplated would be extremely impolite; for this might have a pernicious influence on future negotiations or produce immediate inconveniences, perhaps danger and mischief, in relation to other powers."[14]

Our history is replete with examples of executive privilege. The first explicit recognition of executive privilege came in *Marbury v. Madison*, 5 U.S. 137 (1803). Specifically, Chief Justice John Marshall stated that there was a privilege to withhold confidential communications between the executive and their aides, while retaining for the court the power to decide the extent of that privilege.

The existence of such privilege was equally known when Iowa became a state. Iowa was organized as a territory of the United States on June 12, 1838 (following the Louisiana Purchase).[15] The first constitutional convention in Iowa relating to statehood was held in 1844.[16] A proposed constitution was adopted; however, it was rejected by voters on April 7, 1845.

A second constitutional convention was held in 1846.[17] Iowa voters approved the constitution on August 3, 1846.[18] On December 28, 1846, President James K. Polk signed a law that recognized the state of Iowa as the 29th state of the United States.[19]

The General Assembly (Third) enacted the Iowa Code 1851, effective July 1, 1851. *See* 3 G.A., Ch. 98, § 5. The initial Iowa Code in 1851 – following statehood – recognized that "[a] public officer ***cannot be examined as to communications*** made to him in official confidence, when the ***public interests would suffer by the disclosure***." Iowa Code 1851, § 2395 (Emphasis added). This law has remained unchanged for more than 173 years. *Compare* Iowa Code (2025) § 622.11. An absurd result would be reached if such information could otherwise be obtained through IFOIA.

This evidentiary rule related, essentially, to depositions, discovery requests, and testimony. Explicit language would not have been needed related to public record requests at this time as there was no general right to information by the public and, in fact, no legislative body – state or federal – had adopted any such sunshine law until more than a century later (in the 1960s).

Iowa's third constitutional convention was held in 1857, which resulted in the adoption of Iowa's Constitution on March 5, 1857. It is a bedrock principle that a three-tiered government, such as we have with both our federal and state governments, act as a checks and balance amongst the branches. The separation-of-powers doctrine requires that a branch of government not impair another in the performance of its constitutional duties. *Klouda v. Sixth Judicial Dist. Dept. of Correctional Services*, 642 N.W.2d 255, 260 (Iowa 2002) (internal citations omitted).

---

[14] https://avalon.law.yale.edu/18th_century/gw003.asp
[15] https://www.legis.iowa.gov/docs/publications/ICA/850349.pdf
[16] https://www.legis.iowa.gov/law/statutory/constitution/constConventions/conventionDocuments?year=1844
[17] https://www.legis.iowa.gov/law/statutory/constitution/constConventions/conventionDocuments?year=1846
[18] https://www.legis.iowa.gov/docs/publications/ICNST/780453.pdf
[19] https://maint.loc.gov/law/help/statutes-at-large/29th-congress/session-2/c29s2ch1.pdf

The Iowa Constitution provides:

> "The powers of the government of Iowa shall be divided into three separate departments - - the legislative, the executive, and the judicial: and no person charged with the exercise of powers properly belonging to one of these departments shall exercise any function appertaining to either of the others, except in cases hereinafter expressly directed or permitted."

Iowa Const. art. 3, § 1. It is a fundamental principle that one branch of government is not permitted to intrude upon the powers of another branch of government. *State v. Ragland*, 836 N.W.2d 107, 117 (Iowa 2013); *see also Schwarzkopf v. Sac County Bd. of Sup'rs*, 341 N.W.2d 1, 5 (Iowa 1983) (The separation-of-powers principle is violated if legislature purports to use powers not granted to it by Constitution or usurps powers granted by it to another branch.); *State v. District Court of Jefferson County*, 238 N.W. 290, 293 (Iowa 1931) (General Assembly possesses legislative power of state except so far as it is withheld by Constitution.); *McSurely v. McGrew*, 118 N.W. 415, 419 (Iowa 1908) (State constitution is not a grant but a limitation on legislative power, so that the Legislature may enact any law not expressly or inferentially prohibited by Constitution).

The framers of the Iowa Constitution recognized that the constitution "shall be the supreme law of the state, and any law inconsistent therewith, shall be void. The general assembly shall pass all laws necessary to carry this constitution into effect." Iowa Const. art. 12, § 1. This means that the resolution of any conflict between the Iowa Constitution and Iowa Code chapter 22 with respect to executive privilege would be resolved in favor of the former.

The Iowa Constitution further provides that "[t]he supreme executive power of this state shall be vested in a chief magistrate, who shall be styled the governor of the state of Iowa." Iowa Const. art. 4, § 1. The governor "shall transact all executive business with the officers of government, civil and military, and ***may require information in writing from the officers of the executive department upon any subject*** relating to the duties of their respective officers." Iowa Const. art. 4, § 8 (Emphasis added). It is the duty of the governor that they "shall take care that the laws are faithfully executed." Iowa Const. art. 4, § 9.

In a landmark executive privilege case following enactment of the federal FOIA, *U.S. v. Nixon*, the United States Supreme Court recognized the importance of confidential communications:

> The expectation of a President to the confidentiality of his conversations and correspondence, like the claim of confidentiality of judicial deliberations, for example, has all the values to which we accord deference for the privacy of all citizens and, added to those values, is the necessity for protection of the public interest in candid, objective, and even blunt or harsh opinions in Presidential decisionmaking. A President and those who assist him must be free to explore alternatives in the process of shaping policies and making decisions and to do so in a way many would be unwilling to express except privately. These are the considerations justifying a presumptive privilege for Presidential communications. The privilege is fundamental to the operation of Government and inextricably rooted in the separation of powers under the Constitution.

418 U.S. 683, 708 (1974).

With these constitutional provisions in mind, as observed in *Nixon*, 418 U.S. at 705, "the privilege can be said to derive from the supremacy of each branch within its own assigned area of constitutional duties." And later (*id.* at 708): "The privilege is fundamental to the operation of Government and inextricably rooted in the separation of powers under the Constitution." *See also United States v. Reynolds*, 345 U.S. 1, 6 n. 9 (1953), *Dellums v. Powell*, 561 F.2d 242, 246 (D.C. Cir. 1977), cert. denied, 434 U.S. 880 (1977); and *Ethyl Corporation v. Environmental Protection Agency*, 478 F.2d 47, 51 (4th Cir. 1973).

IV. Iowa Precedence

Executive privilege – asserted by a governor – has been used by numerous governors since enactment of IFOIA in 1967. *See, e.g.,* Ross, Jonathan, V*ilsack Restricts Public from Accessing Documents*, Des Moines Register (10/15/2005) (citing executive privilege, governors have exerted control over certain records); Kauffman, Clark, *Consultant's Report Not Ready for Public, Governor's Office Says*, Des Moines Register (9/4/2009) (Culver has asserted executive privilege in keeping records confidential). Despite such use, there has not been a court in Iowa in the 57-years following enactment of IFOIA where it has been held that governors do not have executive privilege.

An authority on IFOIA is Professor Arthur Earl Bonfield. "Bonfield is much more than a casual observer. In his 45 years at the University of Iowa Law School, he has worked with the Legislature as the principal drafter of amendments to the open meetings law and the open records law." Gearino, Dan, *Iowa's Open Record Laws Are Confusing*, Professor Says, Quad-City Times (9/7/2007). Professor Bonfield noted that with "too much sunshine in government, serious practical problems may emerge." Bonfield, Arthur E., Presentation to Joint Interim Study Committee on Freedom of Information, Open Meetings, and Public Records, (9/6/2007) (located at: https://www.legis.iowa.gov/docs/publications/SD/6542.pdf); *see also* Bowden, Mark, *'Sunshine' May Cause Heartburn, But Cancer?*, The Gazette (9/10/2007) ("University of Iowa professor Arthur Bonfield, an expert on Iowa's sunshine laws, told lawmakers last week that too much "sunshine" causes a "cancer" in government, making it ineffective and inefficient.").

On November 9, 2007, during a Freedom of Information, Open Meetings, and Public Records Study Committee, it was noted in the minutes (p.9) during an exchange between Senator Mary Lundby and Professor Arthur Bonfield of the University of Iowa, regarding a draft proposal that would allow for the identity and qualifications of an applicant for employment to be released, that:

> **Senator Lundby.** Would this requirement be applicable to the Governor when department heads and directors are selected? *Professor Bonfield stated that the Governor's executive privilege authority would likely override the requirements of this statute.*

(Emphasis added).

During this same period (2007), the State Archivist, Gordon Hendrickson, requested that the legislature consider including an executive privilege definition. In a statement from Hendrickson issued on September 6, 2007, he noted that State Archives holds gubernatorial records for all of Iowa's governors and within those records are matters that fall into the category of executive privilege. He was concerned with determining whether there becomes a point in time when the confidentiality protection ends, and the record should become public. *See* Statement of Gordon O. Hendrickson, Ph.D., State Archivist before the Freedom of Information, Open Meetings, and Public Records Legislative Interim Study Committee (9/6/2007).

A. Iowa Judicial Branch

The Iowa Supreme Court, in dicta, recognized the viability of a deliberative process privilege (a form of executive privilege). In discussing the corollary to mental process privilege – the deliberative process privilege – the Iowa Supreme Court in *Office of Citizens' Aide/Ombudsman v. Edwards*, 825 N.W.2d 8, 19 (Iowa 2012), noted "[b]y contrast, the judicial deliberative privilege is absolute." (citing *In re Enforcement of a Subpoena*, 463 Mass. 162, 972 N.E.2d 1022, 1033 (2012) ("This absolute privilege covers a judge's mental impressions and thought processes in reaching a judicial decision, whether harbored internally or memorialized in other nonpublic materials.").

The concept of judicial deliberative process privilege appears to have been embraced – and rightfully so – by the Iowa Judicial Branch. In 2019, the Iowa Standard, an independent news source in Sioux City, reported that following a public record request for communications involving Chief Justice Mark Cady that the State Court Administrator, Todd Nuccio, responded with "deliberative process privilege," as a basis to withhold a number of communications related to the chief justice.[20] Although the Iowa Constitution does not explicitly provide for a judicial deliberative privilege, it is an implied privilege that allows the judicial branch to effectively perform its constitutional duties.

B. Iowa Legislative Branch

Although the legislative branch has exempted itself from IFOIA, it does enjoy a legislative privilege grounded on separation-of-powers principles. The Iowa Supreme Court held "that the Iowa Constitution contains a legislative privilege that protects legislators from compelled document production and that the privilege extends to communications with third parties where the communications relate directly to the legislative process of considering and enacting legislation." *Smith v. Iowa District Court for Polk County*, 3 N.W.3d 524, 527 (Iowa 2024).

"Legislative *privilege* is an evidentiary privilege that serves to protect a legislator from being required to produce documents or testify in court proceedings." *Id.* at 530 (emphasis is original). "It may arise in situations like here where the legislator is not a party to the underlying suit." *Id.* (citation omitted). "Turning to our constitution, we conclude that three provisions of the Iowa Constitution support recognizing a legislative privilege: article III, section 1, which expressly provides for separation of powers between the three branches of government . . ." *Id.* at 534.

---

[20] *See* https://theiowastandard.com/tis-exclusive-chief-justice-cady-secretly-helped-coordinate-opposition-to-judicial-selection-bill-in-iowa/

C. Iowa Executive Branch

Without touching upon the outer contours of an executive branch privilege, there is certainly a privilege for the chief executive. In *State ex rel. Shanahan v. Iowa Dist. Court for Iowa County*, 356 N.W.2d 523, 526-527 (Iowa 1984), it was argued that certain materials held by the Division of Criminal Investigation for the Department of Public Safety were protected by executive privilege, which was "derived from the doctrine of separation of powers in both our State and federal constitutions." (citing Iowa Const. Art. III, § 1; U.S. Const. Art. I, § 1; Art. II, § 1; Art. III, § 1; *United States v. Nixon*, 418 U.S. 683, 706, (1974) ("[T]he privilege can be said to derive from the supremacy of each branch within its own assigned area of constitutional duties.").

As the Iowa Supreme Court was able to resolve the issues on narrower grounds (application of a qualified privilege under Iowa Code Section 622.11), it declined to address the executive privilege argument. *Id.* at 527.

In *Belin v. Reynolds*, 989 N.W.2d 166 (Iowa 2023), executive privilege was also raised but in the context of *timeliness* in responding to public record requests. The Iowa Supreme Court found that issues related to (i) whether a governor is subject to chapter 22, (ii) are records "government records," versus nongovernment records, and (iii) whether the government records were made available do not involve an inquiry into: a governor's "decision-making processes." *Id.* at 177.

The Iowa Supreme Court noted that a response to the record requester in that instance does "not depend on the defendants' thinking," and "does not depend on the defendants' internal conversations" or "any of the inner workings of the Governor's office." *Id.* These comments by the Iowa Supreme Court indicate that records that do evidence a governor's "thinking," involve "internal conversations," or the "inner workings of the office" would be protected. As to timeliness, "we see no reason why the plaintiffs cannot advance timeliness claims without inquiring into political questions or ***invading executive privilege***." *Id.* at 178 (emphasis added).

Ultimately, this opinion tells us that the Governor is subject to IFOIA but that the Iowa Supreme Court is attentive to separation-of-powers and executive privilege. Stated differently, executive privilege relates to the content of a communication and ***not*** the procedures related to responding to a public record request, such as, the thoroughness of a search or the delay in responding to a request.

Even in states with constitutions that do not contain an express formal separation-of-powers clause, executive privilege has been recognized. For example, in *Freedom Foundation v. Gregoire*, 178 Wash.2d 686, 696 (WA 2013), the Washington Supreme Court stated:

> We have long described the separation of powers as one of the cardinal and fundamental principles" of our state constitutional system. Our constitution does not contain a formal separation of powers clause. Nonetheless, the very division of our government into different branches has been presumed throughout our state's history to give rise to a vital separation of powers doctrine.

(internal citation and quotation marks omitted). The Washington Supreme Court went onto "recognize the executive communications privilege as an exemption to the PRA [Public Records Act] comports with the decisions of our sister states." *Id.* at 697. This court recognized that a public records act must give way to constitutional mandates and the constitution supersedes contrary statutory laws. *Id.* at 695.

V. Conclusion

There are numerous cases – state and federal – that discuss the nuances of executive privilege (e.g., executive communications privilege, deliberative process privilege, and mental process privilege) and the scope of such privilege (e.g., pre-decisional, post-decisional, proximity to the governor, etc.). These are complex issues and ones that would likely need to be addressed in a different forum.

The documents that were redacted have been preserved should you choose to pursue litigation in this matter. This response is not to be construed as a waiver or limitation of any additional arguments or defenses that could be raised regarding this matter.

Sincerely,

Steven E. Blankinship

Encl.

IGOV IFOIA 2024-R406 **PRIVILEGE LOG**

Date	Sender	Receipient	Subject	Privilege	Batestamp
11/20/2024 8:38 AM (UTC-06:00)	stannancythompson6@gmail.com	stan.thompson@governor.iowa.gov	Satanic Temple (Legal Memorandum on Religious Displays)	Iowa Code §§ 22.7(4), 622.11; *see also Horsfield Materials, Inc. v. City of Dyersville* , 834 N.W. 2d 444 (Iowa 2013)	1 to 3
11/20/2024 1:34 PM (UTC-06:00)	trisha.quijano@iowa.gov	taryn.frideres@governor.iowa.gov; jacob.nicholson@governor.iowa.gov; kraig.paulsen@iowa.gov; adam.steen@iowa.gov	DAS Executive Agency Report	Satanic Temple referenced on p. 6. Executive Privilage.	4 to 7
11/25/2024 2:33 PM (UTC-06:00)	mason.mauro@governor.iowa.gov	[Gov Reynolds]@governor.iowa.gov; annie.hayes@governor.iowa.gov	Media Prep Doc	Satanic Temple referenced on p. 10. Executive Privilage.	9 to 13
11/25/2024 2:33 PM (UTC-06:00)	mason.mauro@governor.iowa.gov	[Gov Reynolds]@governor.iowa.gov; taryn.frideres@governor.iowa.gov; annie.hayes@governor.iowa.gov	Media Prep Doc	Satanic Temple referenced on p. 98. Executive Privilege.	97-101
12/11/2024 10:49 AM (UTC-06:00)	megan.hall@governor.iowa.gov	eric.wessan@ag.iowa.gov	Satanic Temple (communication to attorney)	Iowa Code §§ 22.7(4), 622.11; *see also Horsfield Materials, Inc. v. City of Dyersville* , 834 N.W. 2d 444 (Iowa 2013)	114
12/15/2024 6:30 PM (UTC-06:00)	annie.hayes@governor.iowa.gov	[Gov Reynolds]@governor.iowa.gov;	Media Prep Doc	Satanic Temple referenced on p. 229. Executive Privilege.	228-231
12/18/2024 3:09 PM (UTC-06:00)	jen.green@governor.iowa.gov	taryn.frideres@governor.iowa.gov	Media Prep Doc	Satanic Temple referenced on p. 496. Executive Privilege.	496-498
12/18/2024 3:22 PM (UTC-06:00)	jen.green@governor.iowa.gov	taryn.frideres@governor.iowa.gov	Media Prep Doc	Satanic Temple referenced on p. 500. Execcutive Privilege.	500-502
12/9/2024 7:00 AM (UTC-06:00)	Jacob Nicholson (text)	Adam Steen (text)	DAS Executive Agency Report	Non-Responsive (related to DAS Executive Report). Executive Privilege.	608
12/14/2024 11:12 AM (UTC-06:00)	Jacob Nicholson (text)	Adam Steen (text)	Satanic Temple (communicating legal advice provided by counsel, Stan Thompson)	Iowa Code §§ 22.7(4), 622.11; *see also Horsfield Materials, Inc. v. City of Dyersville* , 834 N.W. 2d 444 (Iowa 2013)	609-610