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LIEUTENANT GOVERNOR OF GUAM

January 31, 2025

DOUGLAS MOYLAN

Attorney General of Guam

OFFICE OF THE ATTORNEY GENERAL

590 S. Marine Corps Drive, Suite 902

Tamuning, Guam 96913

RE: SUNSHINE REFORM ACT OF 1999 REQUEST

Dear Attorney General Moylan:

Pursuant to the Sunshine Reform Act of 1999, 5 GCA §§ 10101, *et seq.*, I request that you provide to me copies of the below-identified documents:

1. All communications with the Department of Administration related to the establishment of any unclassified positions within the Office of the Attorney General.
2. All documents reflecting analysis conducted before the hiring of your brother Scott Moylan that demonstrated, evinced, or suggested a need for the Office of the Attorney General to hire a chief auditor.
3. All documents containing research and analysis conducted before the hiring of your brother Scott Moylan to establish the correct salary range for a chief auditor.
4. All documents reflecting why your brother Scott Moylan was hired into the Government Corruption Division of the Office of the Attorney General at a salary higher than any other employee of that Division.
5. All documents that evince that any person other than your brother Scott Moylan was interviewed, considered, or recruited for the position in the Government Corruption Division of the Office of the Attorney General for which your brother Scott Moylan was hired.
6. All advertisements and job postings seeking candidates for the position filled by your brother Scott Moylan in the Government Corruption Division of the Office of the Attorney General.

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Fr: Jeffrey A. Moots, Legal Counsel
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7. All communications with the Department of Administration related to the establishment of the position of chief auditor within the Office of the Attorney General, including communications related to determining slotting and salary ranges.
8. The rationale for the \$119,875 starting salary of your brother Scott Moylan in the Government Corruption Division of the Office of the Attorney General.
9. All documents screening you from participation in decisions regarding the hiring, salary determination, evaluation, and/or supervision of your brother Scott Moylan.
10. All communications between you and Joe Guthrie about the hiring of your brother Scott Moylan.
11. All communications between you and Joe Guthrie about the position for which your brother Scott Moylan was hired.
12. All communications between you and Joe Guthrie about the hiring of your fiancée Sheenalyn Hawkins.
13. All advertisements and job postings seeking candidates for the initial position filled by your fiancée Sheenalyn Hawkins at the Office of the Attorney General.
14. All documents screening you from participation in decisions regarding the hiring, salary determination, evaluation, and/or supervision of your fiancée Sheenalyn Hawkins.
15. All advertisements and job postings seeking candidates for the position of Chief of Staff for the Office of the Attorney General.
16. All communications between you and Joe Guthrie about the job performance of your fiancée Sheenalyn Hawkins.
17. All communications between you and Joe Guthrie about the qualifications or attributes you required in the chief of staff.
18. All communications between you and Joe Guthrie about the promotion of your fiancée Sheenalyn Hawkins to chief of staff.
19. All documents screening you from participation in decisions regarding the hiring, salary determination, evaluation, and/or supervision of your fiancée Sheenalyn Hawkins as the Chief of Staff for the Office of the Attorney General.
20. All communications between you and any other employee of the Office of the Attorney General about potential employment of other members of your family.

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21. All documents concerning any ethics training that you, Douglas Moylan, have attended or otherwise undertaken since January 1, 2023.
22. All documents regarding which Office of the Attorney General employees are assigned offices in the Office of the Attorney General facilities at the Bank of Hawaii building in Hagåtña.
23. All documents regarding which Office of the Attorney General employees' offices remain in the Office of the Attorney General facilities at the ITC Building in Tamuning.
24. All documents reflecting the rationale for the Office of the Attorney General occupying new office space at the Bank of Hawaii building in Hagåtña.
25. The procurement file for the Office of the Attorney General's new office space at the Bank of Hawaii building in Hagåtña.
26. All contracts between the Office of the Attorney General and attorneys for the provision of legal services or consultant services since January 1, 2023.
27. The procurement record for any lawyer or law firm engaged by the Office of the Attorney General since January 1, 2023.
28. All documents for the award of Office of the Attorney General contracts with attorneys awarded on a sole source basis, including "a written report for the person making such determination, which shall include a detailed analysis of the minimum needs of the government upon which the contract is based, findings from thorough market research, and a conclusion that will certify accurate and complete necessary data to support their recommendation that there is no other source that will satisfy the minimum needs of the government" as required by 5 GCA § 5214.
29. All documents for the award of Office of the Attorney General contracts with attorneys awarded on a sole source basis demonstrating that the Office of the Attorney General published "notice in a newspaper of general circulation on Guam, and on its website, within fourteen (14) calendar days of awarding any contract under this Section, in excess of Fifty Thousand Dollars (\$50,000)" as required by 5 GCA § 5214.
30. All documents regarding any procedures currently in place to ethically screen you from involvement in any matter.
31. Your ethical screening policy for OAG attorneys.
32. The procurement record for procurement of Office of the Attorney General billboards.

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33. All documents concerning any OAG lawyer currently screened from representing any agency of the Government of Guam.

It is well documented that you conduct official business on the personal email addresses dmoylan@ite.net and dmoylan@gmail.com in addition to your official email address at dmoylan@oagguam.org. As a result, a reasonable search in response to this request will necessarily include searching those and any other accounts on which you have conducted matters related to the Office of the Attorney General.

If you refuse to disclose any document described above, identify the justification for your refusal, if any, as required by 5 GCA § 10103(d).

Please email the responsive documents to me in .pdf format at jeffrey.moots@guam.gov.

Senseramente,



JEFFREY A. MOOTS

Legal Counsel