



## OFFICE OF LEGAL COUNSEL

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LIEUTENANT GOVERNOR OF GUAM

February 4, 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 by and between the Office of the Attorney General (“OAG”) and the Office of the Governor relating to the OAG’s use of the Office of the Governor seal in the OAG billboard depicted in Exhibit A attached hereto.
2. All permits received by the OAG from the custodian of the Office of the Governor seal for use of the seal in the OAG billboard depicted in Ex. A.
3. All communications by and between the OAG and the Guam Department of Labor relating to the OAG’s use of the Guam Department of Labor seal in the OAG billboard depicted in Ex. A.
4. All permits received by the OAG from the custodian of the Guam Department of Labor seal for use of the seal in the OAG billboard depicted in Ex. A.
5. All communications by and between the OAG and the Guam Behavioral Health and Wellness Center relating to the OAG’s use of the Guam Behavioral Health and Wellness Center seal in the OAG billboard depicted in Ex. A.
6. All permits received by the OAG from the custodian of the Guam Behavioral Health and Wellness Center seal for use of the seal in the OAG billboard depicted in Ex. A.
7. All communications by and between the OAG and the Guam Homeless Coalition relating to the OAG’s use of the Guam Homeless Coalition seal in the OAG billboard depicted in Ex. A.
8. All applications and detailed drawings and specifications submitted by the OAG to the Department of Public Works requesting a permit for the erection of OAG billboards from January 1, 2023 to present.
9. All permits issued by the Department of Public Works to the OAG for the erection of OAG billboards from January 1, 2023 to present.
10. All communications by and between the OAG and the Department of Public Works relating to applications for permits for the erection of OAG billboards from January 1, 2023, to present.

To: Douglas Moylan, Attorney General  
Fr: Jeffrey Moots, Legal Counsel  
Date: February 4, 2025  
Re: Sunshine Reform Act of 1999 Request

Page 2 of 2

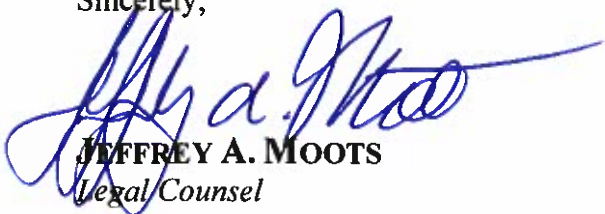
11. Any and all invoices, receipt for payment and purchase orders from January 1, 2023, to the present for any and all billboards or electronic signs erected or rented by the OAG.
12. Any and all communications between any member of the OAG and any person or company regarding the design and appearance of any billboard or electronic sign rented or erected by the OAG from January 1, 2023, to the present.
13. Any opinion formally issued by the OAG regarding the application of 1 GCA § 414, or otherwise analyzing the unlawful use of any representation of any government seal in an advertisement or in any manner likely to give the impression of official Territorial approval without first having obtained a permit from for that use from the authorized custodian thereof, which conduct constitutes a misdemeanor under the laws of Guam, punishable by imprisonment for a maximum term not to exceed one year (unless the provisions of 9 GCA § 80.40 apply) and a fine of One Thousand dollars (\$1,000.00).

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](mailto:jeffrey.moots@guam.gov).

Sincerely,



**JEFFREY A. MOOTS**  
*Legal Counsel*

Exhibit A

