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March 11, 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:

We are in receipt of your FOIA response dated February 28, 2025, Ref. AG 25-0042 ("2/28/2025 FOIA Response"), providing documents related to Office of the Attorney General ("OAG") procurements and contracts. 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. The documents provided in the 2/28/2025 FOIA Response appearing at the following batestamps are illegible. Please provide legible copies of these documents.
 - a. AGO-0067
 - b. AGO-0086
 - c. AGO-0205
 - d. AGO-0730
 - e. AGO-0775
 - f. AGO-1123
 - g. AGO-1131-32
 - h. AGO-1221
2. The complete procurement file relating to all contracts between the OAG and Edward C. Han, including but not limited to solicitations, public notices, evaluation forms, notices of award, contracts, and communications logs.
3. The complete procurement file relating to all contracts between the OAG and Sean Brown, including but not limited to solicitations, public notices, evaluation forms, notices of award, contracts, and communications logs.
4. The complete procurement file relating to all contracts between the OAG and Eric Miller, including but not limited to solicitations, public notices, evaluation forms, notices of award, contracts, and communications logs.

To: Douglas Moylan, Attorney General
Fr: Jeffrey Moots, Legal Counsel
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5. The complete procurement file relating to all contracts between the OAG and Martin Dinehart, including but not limited to solicitations, public notices, evaluation forms, notices of award, contracts, and communications logs.
6. The complete procurement file relating to all contracts between the OAG and Curtis Van de Veld, including but not limited to solicitations, public notices, evaluation forms, notices of award, contracts, and communications logs.
7. The complete procurement file relating to all contracts between the OAG and Consovoy McCarthy PLLC, including but not limited to the solicitation, public notices, evaluation forms, notices of award, contracts, and communications logs.
8. The complete procurement file relating to all contracts between the OAG and Graphics Center, including but not limited to the solicitation, public notices, evaluation forms, notices of award, contracts, and communications logs.
9. A complete copy of OAG RFP 005-2023, referenced on AGO-0979.

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. Additionally, Chief Deputy Attorney General Joseph Guthrie has conducted official business on the personal email address joeguthrie@hotmail.com. As a result, a reasonable search in response to this request will necessarily include searching those and any other accounts on which you and/or Mr. Guthrie 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.

Sincerely,



JEFFREY A. MOOTS
Legal Counsel