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OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

OCT 26 2016

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ZIVA BRANSTETTER and BH Media  
Group Inc. d/b/a *TULSA WORLD*,

Plaintiffs,

v.

MARY FALLIN, in her official capacity as  
GOVERNOR OF THE STATE OF  
OKLAHOMA; MICHAEL C.  
THOMPSON, in his official capacity as  
COMMISSIONER OF THE OKLAHOMA  
DEPARTMENT OF PUBLIC SAFETY,

Defendants.

Case No. CV-14-2372  
Judge Bryan Dixon

**MOTION FOR *IN CAMERA* REVIEW AND TO COMPEL THE DISCLOSURE OF  
RECORDS IMPROPERLY WITHHELD IN WHOLE OR IN PART IN RESPONSE  
TO PLAINTIFFS' OPEN RECORDS ACT REQUESTS**

Dated: October 26, 2016

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Plaintiffs Ziva Branstetter (“Branstetter”) and BH Media Group Inc. d/b/a *Tulsa World* (“*Tulsa World*”) (collectively, “Plaintiffs”) respectfully submit this motion for an *in camera* review of certain records withheld in whole or in part by Defendants Mary Fallin (“Fallin” or the “Governor”), in her official capacity as Governor of the State of Oklahoma, and Michael Thompson (“Thompson” or the “Commissioner”), in his official capacity as Commissioner of the Oklahoma Department of Public Safety (“DPS”) (collectively, “Defendants”), that are responsive to Plaintiffs’ requests under the Oklahoma Open Records Act, Okla. Stat. tit. 51, §§24.A.1, *et seq.*, and to compel the disclosure of all records wrongfully withheld in whole or in part by Defendants. In support of their Motion, Plaintiffs state the following:

### **INTRODUCTION**

This case involves three requests made by Plaintiffs under the Oklahoma Open Records Act, Okla. Stat. tit. 51, §§24.A.1, *et seq.*, (“ORA”), for records concerning the executions of Clayton Lockett and Charles Warner that were submitted to the Office of the Governor and DPS in 2014. While both Defendants, as a result of this lawsuit, have produced some records in response to Plaintiffs’ ORA requests, many have been released only in redacted form, and the Governor’s Office has withheld other responsive records in their entirety.<sup>1</sup>

In response to this Court’s May 6, 2016 order, Defendants have now produced privilege logs for certain redacted and withheld-in-full records identified by Plaintiffs. This

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<sup>1</sup> This Motion is being submitted concurrently with Plaintiffs’ separate motion requesting that the Court order the Governor to search non-governmental email accounts used by her and members of her staff for records responsive to Plaintiffs’ May 1 ORA Request. By these motions, Plaintiffs seek to resolve outstanding issues concerning the records released to Plaintiffs in advance of an evidentiary hearing on Plaintiffs’ allegations that Defendants failed to provide “prompt, reasonable access” to requested records in violation of the ORA.

Motion concerns three categories of those records:

- (1) Redacted versions of transcripts of interviews conducted by DPS during its investigation of the Lockett execution (the “DPS Interview Transcripts”);
- (2) Redacted emails to and from certain individuals in the Governor’s Office concerning the Lockett and Warner executions; and
- (3) Emails to and from certain individuals in the Governor’s Office concerning the Lockett and Warner executions that are being withheld in full from Plaintiffs.

Both Defendants cite Okla. Stat. tit. 22, §1015(B)—which makes “confidential” and not “subject to discovery in any civil or criminal proceedings” the “identity of all persons who participate in or administer the execution process and persons who supply the drugs, medical supplies or medical equipment for the execution”—as the basis for withholding records either in whole or in part from Plaintiffs.<sup>2</sup> In addition, the Governor’s Office cites, *inter alia*, ORA exemptions for personnel records and litigation and investigatory files, the attorney–client, attorney work product, and executive privileges, and a number of state Attorney General opinions, as a basis for withholding other records either in whole or in part.

As set forth below, both Defendants rely on an erroneously broad interpretation of Section 1015(B), and are withholding information that is not within the scope of that statute. Section 1015(B) permits only the identity of the executioners and suppliers of execution drugs and equipment to be withheld, nothing more. In addition, the Governor has also failed to meet her burden to show that the personnel records, attorney–client, work product, or executive privileges apply. Finally, both Defendants have conceded that certain records or

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<sup>2</sup> DPS also cites Okla. Stat. tit. 74, § 840–2.11 as a basis for withholding dates of birth, addresses, telephone numbers, and social security numbers of individuals, as well as Okla. Stat. 24A.8(B) to withhold “personal information” on one page of the DPS Interview Transcripts. Plaintiffs do not concede the propriety of those redactions, but do not seek to challenge them.

portions thereof have been withheld from Plaintiffs without any legal justification whatsoever; such material should be released immediately.

For these reasons, Plaintiffs respectfully request that the Court: (1) order Defendants to submit all records identified on their privilege logs to the Court in unredacted form so that the Court may evaluate the propriety of Defendants' withholdings *in camera*; and (2) order Defendants to release all records (or portions thereof) that have been wrongfully withheld.

### **FACTUAL AND PROCEDURAL BACKGROUND**

At issue in this case are three ORA requests submitted to Defendants (one to the Governor's Office and two to DPS) in May and September of 2014:

#### **A. Plaintiffs' May 1, 2014 ORA Request to the Governor's Office.**

On May 1, 2014, Plaintiffs submitted an ORA request to the Governor's Office seeking "[a]ll records, including emails, associated with the execution of Clayton Lockett and Charles Warner dating from March 1 to the present." First Amended Petition ("FAP"), ¶ 23 & Ex. A. Plaintiffs "agree[d] to limit [their] request to emails (whether on a personal email account or state email account)" to a number of specified persons. *Id.* (hereinafter, the "May 1 ORA Request"). On October 8, 2015, more than one year and five months after Plaintiffs made their May 1 ORA Request, the Governor's Office released approximately 41,697 pages of records, many in heavily redacted form, purportedly in response to that request. *Id.* ¶ 28. In addition to the numerous redactions made to those records, the Governor's Office also withheld certain responsive records in their entirety. *Id.* ¶¶ 28, 30–32, 35–38.

Thereafter, Plaintiffs requested that the Governor's Office provide an index or privilege log setting forth the basis for its redactions and other withholdings. To facilitate the creation of that privilege log, by letter dated March 4, 2016, Plaintiffs provided the

Governor's Office with a prioritized list of certain specific records that were being withheld in whole or in part for inclusion on a privilege log. A true and correct copy of that letter is attached as Exhibit A. At a hearing on May 6, 2016, the Court ordered the Governor's counsel to comply with that request and to produce a privilege log for those records withheld in part or in full that had been identified by Plaintiffs no later than July 1, 2016.

On July 13, 2016, the Governor produced a privilege log for redacted records (the "Governor's Redaction Log") as well as a separate privilege log for records withheld in full (the "Governor's Withheld in Full Log"). Plaintiffs identified a number of deficiencies in the Governor's Withheld in Full Log, including, *inter alia*, that it did not include the dates of all documents withheld, Bates numbers, or to/from/cc/bcc information for emails and other communications. On September 1, the Governor provided an amended version of her Withheld in Full Log that addressed some, but not all, of those deficiencies. True and correct copies of the Governor's privilege logs, as produced to Plaintiffs, are attached collectively as Exhibit B.

**B. Plaintiffs' May 5 and September 4, 2014 ORA Requests to DPS.**

On May 5, 2014, Plaintiffs submitted an ORA request to DPS for "all email to or from Commissioner Michael Thompson and Steve Krise or assistants acting on their behalf" regarding "the execution of Clayton Lockett and Charles Warner and any related policy issues since April 1." FAP ¶ 40 & Ex. C. (hereinafter, the "May 5 ORA Request"). On September 4, 2014, Plaintiffs submitted a second ORA request to DPS for certain material—including full statements given by the Governor and other public officials—from DPS's investigation into Lockett's execution. *Id.* ¶ 43 & Ex. E. (hereinafter, the "September 4 ORA Request").

In March 2015, after this lawsuit was filed, DPS released heavily redacted versions of transcripts of interviews it had conducted during its investigation of the Lockett execution in response to Plaintiffs' September 4 ORA Request (the "DPS Interview Transcripts"). *Id.* ¶¶ 51–52. On June 9, 2015, DPS released additional pages of records responsive to Plaintiffs' September 4 ORA Request, also in heavily redacted form. *Id.* ¶¶ 53–54. On May 6, 2016 and August 3, 2016, DPS released emails responsive to Plaintiffs' earlier May 5 ORA Request.

On May 6, 2016, the Court ordered DPS to provide Plaintiffs, no later than July 1, 2016, with a privilege log for certain of the redacted records to be identified by Plaintiffs. By email dated May 20, 2016, Plaintiffs provided counsel for DPS with the specific page ranges of records containing the redactions that its privilege log should address. A true and correct copy of that email is attached as Exhibit C. DPS provided Plaintiffs its privilege log (hereinafter the "DPS Log") on July 11, 2016. A true and correct copy of the DPS Log, as produced to Plaintiffs, is attached as Exhibit D.

## ARGUMENT

I. **In camera review is appropriate for the Court to evaluate whether information withheld by Defendants falls within the scope of Section 1015(B).**

Title 22, Section 1015(B) of the Oklahoma Statutes states, in pertinent part, that

The identity of all persons who participate in or administer the execution process and persons who supply the drugs, medical supplies or medical equipment for the execution shall be confidential and shall not be subject to discovery in any civil or criminal proceedings.

Okla. Stat. tit. 22, § 1015(B). This statute was never intended to, and does not, make all information about an execution secret. To the contrary, both the plain text of Section 1015(B) and its interpretation by the Oklahoma Supreme Court make clear that its scope is narrow.

First, the statute makes “confidential” the identity—and *only the identity*—of certain, specified “persons.” The term “identity” refers to “who someone is”; *i.e.*, “the name of a person[.]” *Identity*, Merriam Webster, <http://www.merriam-webster.com/dictionary/identity> (last accessed October 16, 2016). And the statute is also limited in terms of the “persons” whose “identit[ies]” it makes confidential. *See* Okla. Stat. tit. 22, § 1015(B). Only the executioners and those “who supply the drugs, medical supplies or medical equipment for the execution” are covered by the language of the statute. *See id.* The Oklahoma Supreme Court has stated that Section 1015(B) “makes secret *only* the identity of the persons who carry out the execution and the identity of the persons who supply the drugs and medical equipment necessary to do so.” *Lockett v. Evans*, 2014 OK 34, ¶ 12, 330 P.3d 488, 491, *reh’g denied* (Apr. 25, 2014) (emphasis added). While the “identit[y],” and only the identity, “*of the executioners[.]*” may be withheld under Section 1015(B), the identities of those—other than suppliers of drugs and medical equipment for the execution—who do not “carry out the execution” are not within the scope of the statute. *Id.* (emphasis added).

Reading Section 1015(B) as a whole underscores that “persons” who are “executioner[s],” *id.*, within the meaning of the statute is limited, and does not include many individuals who might attend an execution in their official capacities. For example, the statute expressly requires the warden of the prison, among others, to be present during an execution. *See* Okla. Stat. tit. 22, § 1015(B). The identity of the warden—Anita Trammell, in the case of Lockett’s execution—is, of course, information that is always known to the public. Thus, the statute recognizes that the warden, while she has some official role in executions, is not an “executioner” whose identity is confidential; she does not “participate in or administer the execution process[.]” *id.*, within the meaning of Section 1015(B).

Although Section 1015(B) makes confidential only the identity of those individuals who actually “carry out the execution, and the identity of the persons who supply the drugs and medical equipment necessary to do so,” *Lockett*, 2014 OK 34, ¶ 12, 330 P.3d 488, 491, Defendants improperly rely on Section 1015(B) to withhold substantial amounts of information responsive to Plaintiffs’ ORA requests. As set forth below, Defendants cite the statute as a basis for withholding the names of individuals who were *not even present* at Lockett’s execution. Accordingly, so that the Court may rule on the propriety of Defendants’ withholdings under Section 1015(B), Plaintiffs respectfully request that the Court conduct an *in camera* review of all records withheld on that basis and order Defendants to release those records, or portions thereof, that have been improperly withheld.

**A. Records of DPS withheld in part under Section 1015(B).**

DPS has improperly redacted significant portions of the DPS Interview Transcripts, citing Section 1015(B). *See* Ex. D. It has redacted the names of persons who are neither “executioners” nor suppliers of “drugs and medical equipment” used to carry out the Lockett execution, and who are therefore are not covered by the statute. For example, in the interview of Steve Mullins—Governor Fallin’s former legal counsel—DPS redacted the names of individuals who appear to be simply members of the Governor’s staff. *See, e.g.*, DPS Interview Transcripts 1884–88, 1892–93. Indeed, the name of one such individual has been completely withheld by DPS, citing Section 1015(B), despite the fact that she or he clearly was not present at the Lockett execution, let alone an “executioner”; her or his *only* involvement in the Lockett execution was speaking *by telephone* with individuals at the prison. DPS Interview Transcripts 2642–2659 ([Redacted] Interview; *see also, e.g., id.* at 1885 (Mullins Interview); *id.* at 1937, 1941 (Chance Interview). This individual authorized

Director Patton to proceed with the execution from the Governor's Office building, in the presence of Mr. Mullins, Ms. Chance, Ms. Rockwell, and others. *See* DPS Interview Transcripts 2644–45. He or she was plainly not one of the “executioners”; nor is there any reason to think that he or she supplied drugs or medical equipment for the execution. *See* Okla. Stat. tit. 22, § 1015(B); *Lockett*, 2014 OK 34, ¶ 12, 330 P.3d at 491. This person's identity cannot be withheld under Section 1015(B).

Also improperly redacted from the DPS Interview Transcripts are the names of nine unidentified prison personnel whose identities are not within the scope of Section 1015(B).<sup>3</sup> One of those prison employees—whose name appears to be Ms. Dedmon<sup>4</sup>—was merely present in the viewing room during the Lockett execution. *See* DPS Interview Transcripts 2856–57 (explaining that she was not part of the extraction team, not part of the strap down team, and not medical personnel). She obviously did not “carry out” the execution. *Lockett*, 2014 OK 34, ¶ 12, 330 P.3d at 491. Similarly, the interview transcript of another prison employee states that “[a]t no time did I ever have contact with offender Lockett.” DPS Interview Transcripts 601. Indeed, according to that interview, the only job that individual had was to “be on the phone with the Governor's office during the process.” *Id.* The rest of the unidentified employees appear to have been involved only in peripheral activities surrounding the execution; none was an executioner or appears to be a supplier of lethal drugs or equipment used in the execution. *See, e.g.*, DPS Interview Transcripts at 2197 (interview stating “I didn't have any contact with Mr. Lockett that day. . . . I—my job was to—I kept a direct line between the viewing room and the execution room.”); *id.* at 2056

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<sup>3</sup> The DPS Interview Transcript pages for these individuals are 2055–2072; 2196–2217; 2367–91; 2838–64; 207–32; 2232–90; 234–53; 133–96; and 600–32.

<sup>4</sup> Ms. Dedmon's name appears unredacted on pages 2844, 2852, and 2855 of the DPS Interview Transcripts.

(interview explaining the individual helped bring Lockett to the execution chamber but that after that “stay[ed] outside the execution chamber and [wasn’t] involved with anything else until they call[ed] [him or her] in.”). Accordingly, their identities are not confidential under Section 1015(B).

In addition, DPS has improperly redacted information—other than names or identities—from its interviews. Such redactions appear in transcripts of interviews with persons who are already identified only by pseudonyms—such as, for example, “Pharmacist.” Assuming that those individuals’ identities are properly withheld under Section 1015(B), because their identities are already shielded by the use of pseudonyms there should be little to no other information in their interview transcripts covered by Section 1015(B). DPS, however, has cited that statute as a basis for withholding large swathes of information in their interviews that would give the public important insight into what went wrong with Lockett’s execution.

For example, DPS has redacted several lines of an interview that concern whether or not the Department of Corrections made any inquiries into the licensing of the “Physician,” DPS Interview Transcripts 2138, as well as other redactions concerning that licensing, *id.*, 2139–40. DPS also redacted several lines concerning whether or not the “Physician” had been contacted regarding DPS’s investigation into the Lockett execution, DPS Interview Transcripts 2161–62. Similarly, the interview transcript of the “Paramedic/Emergency Medical Technician” includes several pages that are entirely or largely redacted, which appear to pertain to, *inter alia*, whether that person was contacted by anyone else regarding the Lockett execution, and how much he or she was paid by the State—information not covered by Section 1015(B) that is of clear importance to the public. DPS Interview

Transcripts 3193–98.

With respect to DPS’s interview of the “Pharmacist,” there are redacted lines that appear to concern information about the execution drugs themselves. That information is not within the scope of Section 1015(B), which only applies to the identity of *persons*. Indeed, in *Lockett*, the Oklahoma Supreme Court made expressly clear that the statute’s “secrecy provision does not make the identity of the drug or drugs secret and any reliance on the provision to do so would be misplaced.” 2014 OK 34, ¶ 11, 330 P.3d at 491.

Accordingly, Plaintiffs request that the Court order DPS to provide unredacted versions of the DPS Interview Transcripts identified in its privilege log for *in camera* review, and order DPS to release in full all records it has wrongfully withheld in part from Plaintiffs.<sup>5</sup>

**B. Records of the Governor’s Office withheld in whole or in part under Section 1015(B).**

A significant number of email addresses have been redacted by the Governor’s Office in records produced to Plaintiffs in response to their May 1 ORA Request, relying on Section 1015(B). Given the context of many of those emails, however, it appears that those email addresses are not those of either executioners or suppliers of lethal injection drugs or medical equipment. *Cf.* Okla. Stat. tit. 22, § 1015(B); *Lockett*, 2014 OK 34, ¶ 12, 330 P.3d at 491. For example, the page Bates-numbered 11299 is an email from John Hadden, an assistant attorney general, to a number of individuals, including a redacted email address, informing them that the Oklahoma Court of Criminal Appeals dismissed an appeal from Lockett and Warner. The email’s salutation is to “Counselors”, and it is highly unlikely that an attorney for the State is also an executioner and/or a supplier of lethal execution drugs/medical

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<sup>5</sup> As explained in more detail below, DPS has not provided any justification, whatsoever, for certain of its redactions. Accordingly, there is no need for the Court to review those pages *in camera* prior to ordering that they be released to Plaintiffs in unredacted form.

equipment. Likewise, page 32308 is an email from Mr. Hadden to [redacted] concerning the Oklahoma Supreme Court’s stay of Lockett’s execution, which states, in part, “I do not know a recommended course of action, but they don’t have the authority to issue a stay of execution so they are essentially provoking a constitutional crisis.” Again, Plaintiffs find it highly unlikely that Mr. Hadden would be discussing potential courses of action with regard to a Supreme Court stay with either a supplier of lethal drugs or equipment, or one of Lockett’s executioners.

In addition to the redacted records, the Governor’s Office has also withheld a number of documents responsive to Plaintiffs’ ORA request in full, citing Section 1015(B).<sup>6</sup> As set forth above, however, the scope of the statute is narrow—it only permits the withholding of the *identities* of a circumscribed group of people. Accordingly, even assuming *arguendo* that those records include the names of executioners and/or suppliers of drugs or equipment used to carry out Lockett’s executions, only those names should be withheld; the names should be redacted and the remainder of the records must be released. The ORA is explicit on this point: “Any reasonably segregable portion of a record containing exempt material shall be provided after deletion of the exempt portions[.]” Okla. Stat. tit. 51, § 24A.5(2). For these reasons, Plaintiffs request an *in camera* review of all records withheld in full by the Governor’s Office so that the Court may assess (1) whether Section 1015(B) applies to any of those records, and (2) if so, whether there is segregable information that is required to be released.

**II. The Governor’s Office has failed to meet its burden for withholding records on the other grounds identified in its privilege logs.**

The Governor’s Office has also withheld numerous records and portions thereof

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<sup>6</sup> The Governor has also cited additional authorities to withhold some of these records; those authorities are addressed below.

responsive to Plaintiffs' ORA request, claiming a variety of exemptions other than or in addition to Section 1015(B). However, the Governor's Office has failed to show that the vast majority of these records may be lawfully withheld. Accordingly, Plaintiffs also request that all records being withheld by the Governor's Office for reasons other than Section 1015(B) be produced in unredacted form to the Court for an *in camera* review.<sup>7</sup>

**A. The Governor has failed to show that the attorney-client privilege applies.**

The scope of the attorney–client privilege is set forth by statute in Oklahoma. *See* Okla. Stat. tit. 12, § 2502. For a governmental agency, like the Governor's Office, Oklahoma law significantly limits the scope of the attorney–client privilege. Indeed, as the Oklahoma Supreme Court has noted, it is “not generally available” at all. *State ex rel. Cartwright v. Oklahoma Indus. Auth.*, 1981 OK 47, 629 P.2d 1244, 1250. Specifically,

There is *no privilege* . . . [a]s to a communication between a public officer or agency and its attorney unless the communication concerns a *pending* investigation, claim or action and the court determines that disclosure will seriously impair the ability of the public officer or agency to process the claim or conduct a pending investigation, litigation or proceeding in the public interest.

Okla. Stat. tit. 12, § 2502(D)(7) (emphasis added).<sup>8</sup>

Here, the Governor has cited the attorney–client privilege as the basis for withholding approximately seven pages of records. *See* Ex. B (identifying pages with the Bates numbering of 41735–38, 41739, 41741, and 41750–51). Yet, there is no indication,

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<sup>7</sup> While Plaintiffs do not concede the propriety of the Governor's withholding of those pages identified with Bates-numbers 41750–51, they do not seek to challenge those withholdings.

<sup>8</sup> Additionally, to be protected under the privilege, a communication must be both (1) “made for the purpose of facilitating the rendition of professional legal services to the client[,]” and (2) “confidential”. Okla. Stat. tit. 12 § 2502(B). “[T]he mere status of an attorney–client relationship does not make every communication between attorney and client protected by the privilege[.]” *Scott v. Peterson*, 2005 OK 84, ¶ 7, 126 P.3d 1232, 1234, and the burden is on the party asserting the privilege to prove it applies. *Id.*

whatsoever, that these communications (1) concern “a pending investigation, claim or action” or (2) that their disclosure “will seriously impair the ability” of the Governor’s Office “to process the claim or conduct a pending investigation, litigation or proceeding in the public interest.” *See* Ex. B; Okla. Stat. tit. 12, § 2502(D)(7). They cannot, therefore, be withheld on that basis.

**B. The Governor has failed to show that the work product privilege applies.**

The work product doctrine generally provides a qualified privilege for the “files and mental processes of lawyers.” *Hickman v. Taylor*, 329 U.S. 495, 514 (1947). It applies to “documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative[.]” Okla. Stat. tit. 12, § 3226. A party resisting disclosure of such information in discovery bears the burden of showing the privilege applies, and must “describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” *Scott v. Peterson*, 2005 OK 84, ¶ 13, 126 P.3d 1232, 1236 (citing Okla. Stat. tit. 12 § 3226(B)(4)).

Here, the Governor’s Office has cited the work product privilege to withhold portions of page 36142 and the entirety of page 41741. The Governor’s assertion of work product as to both records fails. First, the redactions on page 36142 are email addresses to which the Governor’s Office sent a press release about the Lockett execution. That the Governor’s Office would claim that email addresses to which a press release is sent are “documents and tangible things . . . prepared in anticipation of litigation or for trial . . .,” Okla. Stat. tit. 12, § 3226, and is material properly covered by the work product privilege fails on its face.

Second, with respect to page 41741, which has been withheld in full, the Governor's Withheld in Full Log provides no information, whatsoever, concerning the nature of the email or its subject matter, who it was drafted by, or what it concerns. Accordingly, the Governor's Office has failed to meet its burden to show that it is privileged. *See Scott*, 2005 OK 84, ¶ 13, 126 P.3d at 1236.

**C. The Governor has failed to show that the executive privilege applies.**

In *Vandelay Entertainment, LLC v. Fallin*, 2014 OK 109, 343 P.3d 1273, the Oklahoma Supreme Court held that governors of this state may withhold records pursuant to a qualified executive privilege in certain circumstances. The Governor, however, bears “the burden, upon *in camera* review, to demonstrate that the withheld documents f[a]ll within the privilege.” *Id.* at ¶ 22, 343 P.3d at 1278. In order to meet that burden, there are a variety of criteria that must be met: (1) the record must concern advice that was pre-decisional; (2) the advice must be “deliberative (i.e., involved personal opinions, as opposed to purely factual, investigative material)”; (3) the Governor must have solicited or received advice from a “senior executive branch official” for “use in deliberating policy or making a discretionary decision”; (4) the governor and that official “knew or had a reasonable expectation that the advice was to remain confidential at the time it was provided to the Governor”; and (5) “the confidentiality of the advice was maintained by the Governor and the ‘senior executive branch official.’” *Id.* at ¶ 24, 343 P.3d at 1278. Moreover, even if material is subject to the qualified executive privilege, the privilege can be overcome if (1) “the requesting party can show a substantial or compelling need for disclosure” and (2) “the need for disclosure outweighs the public interest in maintaining the confidentiality of the advice.” *Id.* at ¶ 30, 343 P.3d at 1279.

Here, the Governor has cited the executive privilege to withhold approximately four pages of email records in full that are responsive to Plaintiffs' ORA May 1 ORA Request: 41735–39. Ex. B. However, the Governor's privilege log with respect to those withholdings does not satisfy her burden under *Vandelay* for at least two reasons. *First*, the Governor has withheld the identity of the person who sent the emails that she claims are covered by the executive privilege, purportedly relying on Section 1015(B). Without showing that the communication came from a “senior executive branch official[,]” *Vandelay*, 2014 OK 109 ¶ 24, 343 P.3d at 1278, the privilege does not apply.<sup>9</sup> *Second*, there is no showing that any of the withheld material consists of advice for use in policy deliberations or to make a discretionary decision. Because the Governor has not satisfied her burden to demonstrate that the requirements of *Vandelay*, ¶ 24, 343 P.3d at 1278, have been met, the privilege does not apply. *See id.*

Even assuming, *arguendo*, that a portion of pages 41735–39 may be properly withheld under the qualified executive privilege, any factual information must *still* be segregated and released. *See Vandelay*, 2014 OK 109 ¶ 24, 343 P.3d at 1278 (“purely factual, investigative material” does not qualify for the privilege); Okla. Stat. tit. 51, § 24A.5(2) (requiring production of “[a]ny reasonably segregable portion of a record containing exempt material”).

Moreover, again assuming, *arguendo*, that the qualified privilege applies to some of the material withheld by the Governor, the privilege is overcome here. *See id.* ¶ 30, 343 P.3d at 1279. Plaintiffs' need for the records and the public's interest in their disclosure are one in

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<sup>9</sup> Indeed, this further highlights the inconsistencies in the Governor's withholdings: a “senior executive branch official” is not going to be an executioner or lethal drug/equipment supplier whose identity is covered by Section 1015(B).

the same: the citizens of this State are entitled to know what happened before, during, and after the botched Lockett execution. There can be no doubt that the Lockett execution was and continues to be a matter of great public interest and concern. *See, e.g.*, FAP ¶¶ 12, 15, 21. Indeed, the public’s interest in the records that Plaintiffs requested from the Governor’s Office in May 2014 has only been heightened in the two years since the Lockett execution occurred by, among other things, a subsequent grand jury investigation into the executions of Warner and Glossip,<sup>10</sup> the revelation that the State administered a different drug to Warner than what the State said was used (both to Lockett’s attorney and the United States Supreme Court), FAP ¶ 20, and the resignations of Warden Anita Trammel, Steve Mullins, and Robert Patton.<sup>11</sup> As members of the news media, Plaintiffs play an essential role in keeping the citizens of Oklahoma informed as to the actions of government agencies and officials, like the Governor, often by gathering and reporting information contained in public records. FAP ¶ 18. Plaintiffs alone have published a substantial number of stories on these issues, which highlights their strong interest in access to this material. That interest is aligned with the public’s.

**D. The Governor’s Office cannot withhold a non-governmental email address used by the Governor, or email addresses to which it sent press releases.**

Section 24A.7 of the ORA creates an exception to disclosure for certain types of “personnel records” of government employees and requires others to be made available for public inspection and copying. *See* Okla. Stat. tit. 51, § 24A.7. Section 24A.7.2 authorizes public bodies to withhold “personnel records” where “disclosure would constitute a clearly

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<sup>10</sup> Cary Aspinwall & Ziva Branstetter, *Governor’s attorney wanted wrong drug used in execution, knew it had been used before*, *The Frontier* (May 19, 2016), <http://bit.ly/2dYXMzD>.

<sup>11</sup> Chris McDaniel, *Oklahoma Governor’s Counsel Resigns in Midst of Executions Investigation*, *BuzzFeed News* (Feb. 11, 2016), <http://bzfd.it/2egkVzL>.

unwarranted invasion of personal privacy[.]” *Id.* That provision requires a case-by-case balancing test between the public interest in disclosure of the governmental employee’s information and the privacy interest of the employee. *Oklahoma Pub. Employees Ass’n v. State ex rel. Oklahoma Office of Pers. Mgmt.*, 2011 OK 68, 267 P.3d 838.

Here, the Governor’s Office has cited Section 24A.7 to withhold two categories of information: (1) a non-governmental (*i.e.*, non-.gov) email address used by the Governor, and (2) email addresses of the recipients of press releases sent by the Governor’s Office. *See* Ex. B. The personnel records exception does not apply to either category.

With respect to the first category, as discussed in detail in Plaintiffs’ concurrently filed Motion to Compel the Governor to Search for and Produce Email Records, Plaintiffs are aware that the Governor uses a non-governmental email address—maryfallin@sbcglobal.net—to conduct public business. FAP ¶¶ 34-36. *See also* Pls. Mot. to Compel the Governor to Search for and Produce Email Records. Thus, even assuming, *arguendo*, that such an email address met the definition of a “personnel record,”<sup>12</sup> there is not even an arguable privacy interest on the part of the Governor in redacting it from records requested by Plaintiffs.

Further, even if some privacy interest was implicated by the Governor’s decision to use a non-governmental email account to conduct the State’s business, the public interest in disclosure clearly outweighs it. There has been widespread interest in recent months and years in the use of non-governmental email accounts by public officials at both the state and federal level, especially where that use intersects with the requirements of public records

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<sup>12</sup> Email addresses are neither listed among the types of records that a public body may keep confidential in Section 24A.7 nor analogous to an employee’s date of birth or identification number. *Cf. Oklahoma Pub. Employees Ass’n*, 2011 OK 68, ¶ 39, 267 P.3d at 852.

laws. See, e.g., Michael S. Schmidt, *Hillary Clinton Used Personal Email Account at State Dept., Possibly Breaking Rules*, The N.Y. Times (Mar. 2, 2015), <http://nyti.ms/1AScOvH>; Dustin Racioppi, *Christie's personal email must be searched, judge rules*, NorthJersey.com (Sep. 9, 2016), *archived at* [perma.cc/54QL-XKWP](http://perma.cc/54QL-XKWP); Associated Press, *Gov. Scott used private email for public business*, Tampa Bay Times (Nov. 25, 2014), <http://bit.ly/2ecWCiv>. The Governor's admission that she has a non-governmental account to conduct public business—in this case for communications related to the Lockett and/or Warner executions—is of enormous public interest, as it raises questions about whether her emails are properly archived in connection with state records retention laws, as well as whether they were searched in response to public records requests. See Oklahoma Archives and Records Commission, *Records Scheduling*, <http://libraries.ok.gov/state-employees/records-management/records-scheduling/> (last accessed Oct. 24, 2016); Pls. Mot. to Compel the Governor to Search for and Produce Email Records (submitted concurrently with this motion). Thus, her non-governmental email account cannot be kept secret from the public.

With respect to the second category, again assuming *arguendo* that an email address is a personnel record, *see supra* note 12, Section 24A.7.2 only applies to personnel records of government employees, not private persons. See Okla. Stat. tit. 51, § 24A.7. Accordingly, the Governor's Office cannot under that provision withhold the names or email addresses of recipients of press releases who are not government employees.

**E. An *in camera* review is necessary to determine whether records withheld by the Governor's Office are outside the scope of Plaintiffs' request.**

Governor Fallin has withheld a number of records from Plaintiffs by asserting that the documents originated before the timeframe specified in Plaintiffs' May 1, 2014 ORA Request. In order to evaluate this claim, Plaintiffs' counsel specifically requested that the

Governor's privilege log include dates for each document. While the log does include dates for some records, it fails to include *any* dates for the records that the Governor's Office asserts are outside the scope of Plaintiffs' request, despite Plaintiffs' request. *See* Ex. B. Accordingly, Plaintiffs respectfully request that the Court review those documents *in camera* to evaluate whether they are responsive to Plaintiffs' May 1, 2014 ORA Request. The Bates numbers of the documents withheld by the Governor's Office on this basis are 41714–34.

**III. Defendants must release all records for which they have not provided a legal justification for withholding or conceded that the withholding was in error.**

For a number of records, Defendants have failed to provide any legal justification for withholding. Accordingly, Plaintiffs request the Court order Defendants to immediately produce them in full to Plaintiffs; there is no need for the Court to review them *in camera*.

*First*, DPS has made no effort to justify a number of redactions in the DPS Interview Transcripts that Plaintiffs' specifically asked be included on DPS's privilege log.<sup>13</sup> Accordingly, the pages set forth in Appendix A should be released to Plaintiffs.

*Second*, in the Governor's Redaction Log the Governor's Office admits that Steve Mullins's non-governmental email address on page 15988 was "fully redacted in error[.]" That information should, therefore, be produced to Plaintiffs in unredacted form.

*Third*, the Governor's Office has cited two opinions of the Attorney General—1999 OK AG 30 and 2001 OK AG 46—as a basis for withholding a number of email addresses and a number of records in full. *See* Ex. B. As a preliminary matter, there is no provision in the ORA that allows records to be withheld pursuant to an Attorney General's opinion: "[u]nless a record falls within a *statutorily* prescribed exemption in the Act, the record must be made available for public inspection." *Citizens Against Taxpayer Abuse, Inc. v. City of*

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<sup>13</sup> This refers to the substance of the transcripts, not the redactions of the Bates numbers at the bottom of the transcripts, which DPS erroneously asserts are covered by Section 1015(B).

*Oklahoma City*, 2003 OK 65, ¶ 12, 73 P.3d 871, 875 (emphasis added). In conducting its *in camera* review and/or ordering the release of records to Plaintiffs, the Court should disregard any such assertion by the Governor's Office that an Attorney General opinion permits it to withhold records and order it to turn over any records improperly withheld on such basis.

To the extent that the Governor intended to rely on the statutes discussed within these opinions as a basis for withholding email addresses, it is also mistaken. First, 1999 OK AG 30 addresses only the disclosure of phone numbers (which are required to be withheld by public bodies under ORA § 24A.7(D)), and 2001 OK AG 46 states primarily that emails are records under the ORA and should be treated in accordance with the Records Management Act. Neither addresses whether the Governor's non-governmental email address, or the email addresses of those her office has contacted, may be withheld from the public. Second, with respect to the records withheld in full purportedly on the basis of these two opinions, even assuming, *arguendo*, that they contain some information that may be properly withheld under the ORA, that information must be redacted and the rest of the record produced. *See* Okla. Stat. tit. 51, § 24A.5(2). The Governor's Office has not provided any justification for why these records have been withheld in full.

### CONCLUSION

For the reasons stated herein, Plaintiffs respectfully request the Court (1) order Defendants to submit all records identified on their privilege logs to the Court in unredacted form for an *in camera* review; and (2) order Defendants to release all records (or portions thereof) that have been wrongfully withheld.

Dated: October 26, 2016

Respectfully submitted,

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

This is to certify that on October 26, 2016 a true and correct copy of the foregoing instrument was transmitted electronically and mailed, postage prepaid, to the following counsel of record:

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Oklahoma City, OK 73111

  
\_\_\_\_\_

1402666.1:999904:01820

## APPENDIX A

Pages and portions thereof for which DPS has provided no justification for withholding:

- 277-78
- 285
- 288
- 295, lines 1-9 & 13-18
- 296
- 306, lines 19-21 & 24-25
- 310, lines 18-22
- 319
- 327
- 406
- 414
- 417-19
- 421-22
- 425
- 428
- 433-35
- 692, lines 4-8, 10-13
- 783
- 1669-71
- 1678
- 1682-83
- 2058, line 18

# EXHIBIT A

# REPORTERS COMMITTEE

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CAROL ROSENBERG  
*The Miami Herald*

THOMAS C. RUBIN  
*Seattle, Wash.*

ERIC SCHMITT  
*The New York Times*

MARGARET LOW SMITH  
*The Atlantic*

JENNIFER SONDAG  
*Bloomberg News*

PAUL STEIGER  
*Pro Publica*

PIERRE THOMAS  
*ABC News*

SAUNDRA TORRY  
*USA Today*

JUDY WOODRUFF  
*PBS / The NewsHour*

*Affiliations appear only  
for purposes of identification.*

March 4, 2016

Jennifer Chance  
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Jennifer.Chance@gov.ok.gov

## VIA EMAIL

Re: *Branstetter et al. v. Fallin et al.*, Oklahoma County No. CV-14-2372

Dear Ms. Chance,

We are in receipt of your letter of February 22, 2016 regarding outstanding issues on the Governor's Office's production of records in response to the ORA requests at issue in the above-captioned case.

With respect to the first issue, and per our earlier correspondence, we are providing below a prioritized list of redactions for you to review in connection with Plaintiffs' request for a *Vaughn* index. *See Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). We appreciate your review of these materials in an effort to avoid further delay and motion practice. Specifically, Plaintiffs request a prioritized *Vaughn* index for the following records<sup>1</sup>:

- The 54 pages of records withheld in their entirety, as identified in Mr. Mullin's October 7, 2015 letter;
- All redactions on pages 6911, 6951, 11297, 11299, 11303, 11338, 11539; 11556, 15403, 15654, 15665, 15668, 15688, 15906, 15988, 17013, 17121, 32287, 32292, 32298, 32299, 32308, 32311, 32313, 32334, 32337, 32343, 32347, 32349, 32351, 32352, 32358, 32361, 32363, 35030, 35035, 35643, 35670, and 36142-44.

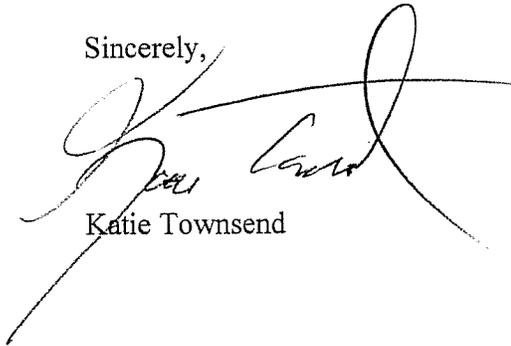
With respect to the second and third issues raised in your February 22 letter it is clear that we will be unable to come to an agreement as to the scope of the Governor's responsibilities.

---

<sup>1</sup> All page numbers, unless otherwise noted, refer to the stamped number at the bottom of the records produced to Plaintiffs in response to their ORA requests.

Please let us know at your earliest convenience, but in any case no more than one week from the date of this letter, whether the Governor's Office will provide a *Vaughn* index for the withheld information identified above. If you have any questions, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Townsend', with a large, sweeping flourish extending to the right.

Katie Townsend

# **EXHIBIT B**

Page #	Redaction 1	Redaction 2	Redaction 3	Redaction 4	Redaction 5
6911	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
6951	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted		N/A	N/A	N/A
11297	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A	N/A
11299	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
11303	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A	N/A
11338	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A	N/A
11539	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
11556	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
15403	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A

Page #	Redaction 1	Redaction 2	Redaction 3	Redaction 4	Redaction 5
15654	See 51 O.S. § 24A.7, 1999 OK AG 30, and 2001 OK AG 46 - back end of Governor's private email	N/A	N/A	N/A	N/A
15665	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
15668	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A
15688	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
15906	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A
15988	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	Steve Mullins private email fully redacted in error ( 51 O.S. § 24A.7, 1999 OK AG 30, and 2001 OK AG 46) - see p. 15986	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted
17013	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A
17121	Document dates are outside the scope of the Plaintiff's open record request of records March 1-present	N/A	N/A	N/A	N/A

Page #	Redaction 1	Redaction 2	Redaction 3	Redaction 4	Redaction 5
32287	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A
32292	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line
32298	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A	N/A
32299	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line
32308	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A
32311	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	
32313	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A
32334	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A
32337	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A
32343	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A
32347	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A

Page #	Redaction 1	Redaction 2	Redaction 3	Redaction 4	Redaction 5
32349	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A
32351	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	N/A	N/A
32352	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - staff member's name or signature line
32358	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A
32361	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A
32363	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A
35030	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
35035	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	See 51 O.S. § 24A.7, 1999 OK AG 30, and 2001 OK AG 46 - back end of Governor's private email	N/A	N/A	N/A
35643	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A
35670	See 22 O.S. §1015(B) - ok.gov Gov Staff email redacted	N/A	N/A	N/A	N/A

Page #	Redaction 1	Redaction 2	Redaction 3	Redaction 4	Redaction 5
36142	Press Dept Distribution List which contains constituent private emails/ GMF Work Product	N/A	N/A	N/A	N/A
36143	Press Dept Distribution List which contains constituent private emails - See 51 O.S. § 24A.7, 1999 OK AG 30, and 2001 OK AG 46	N/A	N/A	N/A	N/A
36144	Press Dept Distribution List which contains constituent private emails - See 51 O.S. § 24A.7, 1999 OK AG 30, and 2001 OK AG 46	N/A	N/A	N/A	N/A

Document #	Document Title	Document Description	# of Pages	Privilege
1, 2	Clayton Lockett - Execution Day Emergency Contact List (email)	Email from the Office of the Attorney General (OAG) distributing the Execution Day Contact List.	1	22 O.S. §1015(B)
3, 4	Emergency Contact Lists for Lockett and Warner executions (email)	Execution Day Contact List - this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	1	22 O.S. §1015(B)
5	Clayton Derrell Lockett Execution Day Emergency Contact List	Execution Day Contact List - this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	2	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
6, 8, 10, 11, 12	Clayton Derrell Lockett Execution Day Emergency Contact List	Execution Day Contact List - this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	2	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
7,9,15,17, 18, 19 20, 21, 22, 25, 26, 29, 30, 31, 35, 40		Document dates are outside the scope of the Plaintiff's open record request.		51 O.S. § 24A.17(B)(1)
13, 14, 27, 28	Execution of Clayton Lockett (email)	Email to Governor	1	22 O.S. §1015(B)/ Attorney Client
16	Execution of Lockett (email)	Email to Governor	1	22 O.S. §1015(B)/Attorney Client
23	Lockett and Warner executions (email)	Email from OAG requesting staff information for execution day contact list	1	22 O.S. §1015(B)
24	Tuesday, April 29, 2014 6:30:59 PM (draft email)	Draft Email to Governor	1	22 O.S. §1015(B)/Attorney Client/ work product

Document #	Document Title	Document Description	# of Pages	Privilege
32	RE: Glossip - Order Setting Execution Date (email)	Email from OAG requesting staff information for execution day contact list	1	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
33	RE: Glossip - Order Setting Execution Date (email)	Email to OAG regarding staff information for the execution day contact list	1	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
34	RE: Glossip - Order Setting Execution Date (email)	Email to OAG regarding staff information for the execution day contact list	2	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
36	RE: Lockett & Warner executions (email)	Email from OAG requesting staff information for execution day contact list	1	22 O.S. §1015(B)
37	RE: Lockett & Warner executions (email)	Email to OAG regarding staff information for the execution day contact list	1	22 O.S. §1015(B)
38	RE: Lockett & Warner executions (email)	Email from OAG requesting staff information for execution day contact list	1	22 O.S. §1015(B)
39	RE: Lockett execution (email)	Email to OAG regarding staff information for the execution day contact list	1	22 O.S. §1015(B)
41	Ltr from the Office of the Attorney General re:Litiation Hold/Preservation Notice regardin the litigation relating to the execution of Clayton Lockett & the postponed execution of Charles W. Warner	Ltr from the Office of the Attorney General re:Litiation Hold/Preservation Notice regardin the litigation relating to the execution of Clayton Lockett & the postponed execution of Charles W. Warner	2	Attorney Client; 51 O.S. § 24A.12

Document	Bates Numbers	Document Title	# of Pages Per Document	Email/ Document Date	Email From	Email To	CC	BCC	Document Description	Privilege
1, 2	41698 - 41699	Clayton Lockett - Execution Day Emergency Contact List (email)	1	4/22/2014	Angie Brown, OAG	esp@oag.ok.gov; Tom Bates; Katie Dark; Cary Box; Melissa Houston; Diane Clay; Aaron Cooper; Jennifer Miller; Seth Branham; Jennifer Crabb; Robert Whittaker; Jenny Dickson; Lesley March; Karen Cunningham; John Hadden; Lori Cornell; See 22 O.S. §1015(B) (Gov Employee); dbickell@supremecourt.gov; ardell_schuler@ca10.uscourts.gov; See 22 O.S. §1015(B) (Warden); melody.bryant@doc.state.ok.us	N/A	N/A	Email from the Office of the Attorney General (OAG) distributing the Execution Day Contact List.	22 O.S. §1015(B)

Document #	Bates Numbers	Document Title	# of Pages Per Document	Email/ Document Date	Email From	Email To	CC	BCC	Document Description	Privilege
3, 4	41700 - 41701	Emergency Contact Lists for Lockett and Warner executions (email)	1	1/4/29/2014	Angie Brown, OAG	esp@oag.ok.gov; Tom Bates; Katie Dark; Cary Box; Melissa Houston; Diane Clay; Aaron Cooper; Jennifer Miller; Seth Branham; Jennifer Crabb; Robert Whittaker; Jenny Dickson; Lesley March; Karen Cunningham; John Hadden; Lori Cornell; See 22 O.S. §1015(B) (Gov Employee); dbickell@supremecourt.gov; cjrappp@supremecourt.gov; ardell_schuler@ca10.uscourts.gov; See 22 O.S. §1015(B) (Warden); melody.bryant@doc.state.ok.us	N/A	N/A	Execution Day Contact List this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	22 O.S. §1015(B)

Document #	Bates Numbers	Document Title	# of Pages Per Document	Email/ Document Date	Email From	Email To	CC	BCC	Document Description	Privilege
5	41702 - 41703	Clayton Derrell Lockett Execution Day Emergency Contact List	2	N/A	N/A	N/A	N/A	N/A	Execution Day Contact List this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
6, 8, 10, 11, 12	41704 - 41713	Clayton Derrell Lockett Execution Day Emergency Contact List	2	N/A	N/A	N/A	N/A	N/A	Execution Day Contact List this contains private cell phones for Court of Criminal Appeals Judges, DA, Public Defender, etc..	22 O.S. §1015(B)/ 1999 OK AG 30 - Confidential Contact Info
7, 9, 15, 17, 18, 19 20, 21, 22, 25, 26, 29, 30, 31, 35, 40	41714 - 41734	Document dates are outside the scope of the Plaintiff's open record request.							Document dates are outside the scope of the Plaintiff's open record request.	51 O.S. § 24A.17(B)(1) Executive Privilege/ 22 O.S. §1015(B)/ Attorney Client Executive Privilege/ 22 O.S. §1015(B)/ Attorney Client
13, 14, 27, 28	41735 - 41738	Execution of Clayton Lockett (email)	1	4/29/2014	See 22 O.S. §1015(B)	Governor, Denise Northrup, Steve Mullins, Jennifer Chance	N/A	N/A	Email to Governor	Executive Privilege/ 22 O.S. §1015(B)/ Attorney Client Executive Privilege/ 22 O.S. §1015(B)/ Attorney Client
16	41739	Execution of Lockett (email)	1	4/29/2014	See 22 O.S. §1015(B)	Governor	N/A	N/A	Email to Governor	Executive Privilege/ 22 O.S. §1015(B)/ Attorney Client
23	41740	Lockett and Warner executions (email)	1	4/28/2014	Angie Brown, OAG	See 22 O.S. §1015(B)			Email from OAG requesting staff information for execution day contact list	22 O.S. §1015(B)

Document #	Bates Numbers	Document Title	# of Pages Per Document	Email/ Document Date	Email From	Email To	CC	BCC	Document Description	Privilege
24	41741	Tuesday, April 29, 2014 6:30:59 PM (draft email)	1	4/29/2014	N/A	N/A	N/A	N/A	Draft Email to Governor	22 O.S. §1015(B)/Attorney Client/ work product
32	41742	RE: Glossip - Order Setting Execution Date (email)	1	5/28/2016	Angie Brown, OAG	See 22 O.S. §1015(B)	N/A	N/A	Email from OAG requesting staff information for execution day contact list	22 O.S. §1015(B)/1999 OK AG 30 - Confidential Contact Info
33	41743	RE: Glossip - Order Setting Execution Date (email)	1	5/28/2016	See 22 O.S. §1015(B)	Angie Brown, OAG	See 22 O.S. §1015(B)		Email to OAG regarding staff information for the execution day contact list	22 O.S. §1015(B)/1999 OK AG 30 - Confidential Contact Info
34	41744 - 41745	RE: Glossip - Order Setting Execution Date (email)	2	5/28/2016	See 22 O.S. §1015(B)	Angie Brown, OAG	N/A	N/A	Email to OAG regarding staff information for the execution day contact list	22 O.S. §1015(B)/1999 OK AG 30 - Confidential Contact Info
36	41746	RE: Lockett & Warner executions (email)	1	4/28/2016	Angie Brown, OAG	See 22 O.S. §1015(B)	N/A	N/A	Email from OAG requesting staff information for execution day contact list	22 O.S. §1015(B)
37	41747	RE: Lockett & Warner executions (email)	1	4/28/2016	See 22 O.S. §1015(B)	Angie Brown, OAG	N/A	N/A	Email to OAG regarding staff information for the execution day contact list	22 O.S. §1015(B)
38	41748	RE: Lockett & Warner executions (email)	1	4/28/2016	Angie Brown, OAG	See 22 O.S. §1015(B)	N/A	N/A	Email from OAG requesting staff information for execution day contact list	22 O.S. §1015(B)

Document #	Bates Numbers	Document Title	# of Pages Per Document	Email/ Document Date	Email From	Email To	CC	BCC	Document Description	Privilege
39	41749	RE: Lockett execution (email)	1	4/21/2016	See 22 O.S. §1015(B)	Angie Brown, OAG	N/A	N/A	Email to OAG regarding staff information for the execution day contact list	22 O.S. §1015(B)
41	41750 - 41751	Ltr from the Office of the Attorney General re:Litigation Hold/Preservation Notice regarding the litigation relating to the execution of Clayton Lockett & the postponed execution of Charles W. Warner	2	5/9/2014					Ltr from the Office of the Attorney General re:Litigation Hold/Preservation Notice regarding the litigation relating to the execution of Clayton Lockett & the postponed execution of Charles W. Warner	Litigation Privilege/ Attorney Client/ 51 O.S. § 24A.12

# EXHIBIT C

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*The Atlantic*

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for purposes of identification.*

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VIA ELECTRONIC MAIL

May 20, 2016

**Re: *Branstetter et al. v. Fallin et al.*, Case No. CV-14-2372**

Dear Mr. Krise,

Pursuant to the Court's May 6, 2016 Order, this letter identifies by page number the redactions that should be addressed in the *Vaughn* index/privilege log that your client will be submitting to Plaintiffs and the Court on or before July 1, 2016.

As an initial matter, we have now had an opportunity to review the records that you provided to us immediately before the hearing on May 6, 2016 that you represented (both to us and the Court) "satisfied" your client's obligations vis-à-vis Plaintiffs' May 5, 2014 Open Records Act ("ORA") Request that is at issue in this litigation. It is readily apparent from even a cursory review of those materials that what your client has provided does no such thing.

First, the production is clearly incomplete. Plaintiffs requested "all email to or from Commissioner Michael Thompson and Steve Krise or assistants acting on their behalf—regardless of who sent or received these emails—regarding the execution of Clayton Lockett and Charles Warner and any related policy issues since April 1[, 2014]." DPS's May 6 production—which I will remind you came more than two years after my client's ORA Request was submitted—consists of fewer than 1,200 pages of records, the vast majority of which are duplicates of the same handful of emails. We find it inconceivable that since April 1, 2014 you, Commissioner Thompson, and assistants acting on your behalf—combined—sent or received only the scant handful of emails concerning the executions of Lockett, Warner, and related policy issues that you released to Plaintiffs on May 6. We fully intend to raise with the Court your insufficient search for and production of records responsive to Plaintiffs' May 5, 2014 ORA Request.

Second, the records you produced on May 6, 2016 in response to Plaintiffs' ORA Request have been altered in such a way that the date the email was originally sent or received has been removed (and frequently

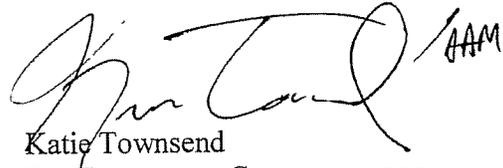
replaced by a series of other dates), leaving Plaintiffs unable to tell when the email was generated. For example, most of the emails included in the May 6 production include in the "date" field a number of different forwarding dates, all of which appear to be later than the date on which the email was originally sent or received. Obviously, Plaintiffs are entitled to unaltered emails with accurate dates and timestamps. Accordingly, in response to this email, please indicate when DPS will be providing us with the original, unaltered versions of the records it released on May 6.

As to the *Vaughn* index/privilege log the Court has ordered DPS to provide no later than July 1, Plaintiffs have identified the following items to be included on that log. In addition to those records that are being withheld from Plaintiffs in their entirety, Plaintiffs have identified approximately 795 pages of records, listed below, which contain redactions that should be included on the log. Please note, however, that in some cases the page ranges specified below may include some pages without redactions.

- All records being withheld in their entirety that are responsive to Plaintiffs' May 5, 2014 and September 4, 2014 ORA requests at issue in this case;
- Any and all redactions to the following pages, which are labeled with the prefix "OKWD CIV-14-665-F":
  - 01344 to 01345;
  - 01936 to 01954;
  - 02228 to 02229;
  - 02543 to 02545;
  - 02805;
  - 01663 to 01698;
  - 02028 to 02037;
  - 01878 to 01916;
  - 00402 to 00441;
  - 03038 to 03202;
  - 02695 to 02729;
  - 00273 to 00331;
  - 00674 to 00791;
  - 02054 to 02072;
  - 02194 to 02217;
  - 02365 to 02391;
  - 02836 to 02864;
  - 00205 to 00231;
  - 02230 to 02290;
  - 00232 to 00253;
  - 00131 to 00196;
  - 00598 to 00632;
  - 02106 to 02162;
  - 02640 to 02659;
  - 02822 to 02823;

As the Court indicated at the hearing on May 6, please ensure that—for each redaction and for each record withheld in full—your log includes enough detail concerning the nature of the withheld material, as well as the legal basis you assert justifies its withholding, to enable Plaintiffs and the Court to evaluate the propriety of your redactions and withholdings.

Best regards,

A handwritten signature in black ink, appearing to read "Katie Townsend", with a stylized flourish at the end that includes the letters "HAM".

Katie Townsend  
THE REPORTERS COMMITTEE FOR  
FREEDOM OF THE PRESS  
*Counsel for Plaintiffs*

cc: Jennifer Chance, Office of the Governor

# EXHIBIT D

Page #	Subject
01344 to 01345;	Executioner 2 Interview
01936 to 01954;	Jennifer Chance Interview
02228 to 02229;	Executioner 1 Interview
02543 to 02545;	Executioner 3 Interview
02805;	Governor Fallin DOB, address, phone #
01663 to 01698;	John Hadden Interview
02028 to 02037;	Michael McNutt Interview
01878 to 01916;	Steve Mullins Interview
00402 to 00441;	Mike Oakley Interview
03038 to 03202;	Paramedic Interview
02695 to 02729;	Paramedic Interview
00273 to 00331;	Robert Patton Interview
00674 to 00791;	Anita Trammel Interview
02054 to 02072;	Execution team member
02194 to 02217;	Execution team member
02365 to 02391;	Execution team member
02836 to 02864;	Viewing room DOC employee
00205 to 00231;	Execution team member
02230 to 02290;	Execution team member
00232 to 00253;	Execution team member
00131 to 00196;	Execution team member
00598 to 00632;	Execution team member
02106 to 02162;	Physician interview
02640 to 02659;	Execution team member
02822 to 02823;	Pharmacist interview

Bates Page #	Line # (if applicable)	Description	Protection
All pages		Original Bates numbers	
1344-1345		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1937	27-30	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1938	19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1940	19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1941	1, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1943	6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1945	10, 30	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1948	21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1949	15-17, 19-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1950	25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1951	5, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1953	25, 28	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2228-2229		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2543-2544		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2805		Date of Birth, Address, Telephone Number, Social Security #	74 O.S. 840-2.11
1663		Address	74 O.S. 840-2.11
1664		Telephone number, Social Security #	74 O.S. 840-2.11
1672	21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1674	9-10, 12-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1675	7-8, 11-17, 19, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1677	9, 19, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1679	20-22, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1680	1-2, 6, 9-13, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1691	22-23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1692	4-6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2030	13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2033	5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2034	21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1878		Date of Birth, Address, Telephone Number, Social Security #	74 O.S. 840-2.11
1883	20-21, 23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1884	14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1885	6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1886	4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1887	17-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1888	1, 3, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1892	16, 20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1893	12, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1898	22, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
1903	12, 19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

407	14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
409	10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
411	25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
412	18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3040	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3041	6-7, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3044	9-10, 14, 17-18, 20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3045	7-8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3049	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3050	12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3057	9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3058	12-13, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3060	2, 4-5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3061	1-2, 4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3062	6-8, 16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3065	22-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3066	1, 6-7, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3068	13, 19, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3070	4-6, 9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3071	20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3072	9, 12-13, 15, 20, 22-23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3073	1, 6, 9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3074	6-7, 11, 13, 19, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3079	3, 6, 10, 16, 18, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3080	1-3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3085	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3086	20-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3087	4, 9-10, 13, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3088	1-4, 7, 12, 15-16, 18-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3089	7, 10, 12-14, 23-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3090	6-7, 14, 19, 21, 23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3091	13-14, 16, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3092	3, 7, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3093	4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3094	20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3095	4, 11, 16, 19, 23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3096	7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3097	4, 7-8, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3098	1, 7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3100	23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3101	11-12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

3102	25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3103	2, 4, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3104	3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3105	17, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3106	3, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3107	2-3, 5, 9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3111	7-8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3113	21, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3114	8, 17-18, 23-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3115	4, 10, 17, 22-23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3116	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3118	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3119	13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3125	1, 7, 15-16, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3126	6, 10, 14, 20-21, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3127	1-2, 5-6, 12, 19-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3128	14, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3129	3, 13-14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3131	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3135	5, 7, 9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3141	23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3142	1-4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3144	11, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3145	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3146	10-12, 16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3148	17-18, 21, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3149	1-3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3152	22, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3153	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3155	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3156	18, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3157	2, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3159	1-2, 12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3160	16-18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3161	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3166	9, 11, 13, 15-18, 22-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3167	1-2, 17, 19-20, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3168	8, 12, 17, 22, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3169	1, 6-7, 9-10, 14-15, 17, 19, 22, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3170	5-8, 10, 12, 14, 19-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3171	19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

3174	7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3178	18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3179	12-13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3181	4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3186	14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3190	17, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3191	1, 14, 21-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3192	11, 22, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3193	1-2, 17, 20-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3194		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3195	1-6, 8-9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3196	1, 9-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3197		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
3198	1-17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2696	11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2701	12-13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2706	25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2707	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2708	20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2711	9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2713	22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2714	1, 17, 22, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2715	1, 5-6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2717	18, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2718	14, 17, 20, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2719	2, 14, 18, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2720	11-14, 17-18, 21, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
294	10-11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
295	24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
298	18-19, 23-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
299	1, 5, 13-14, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
300	4, 13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
305	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
306	8, 10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
308	2, 5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
310	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
318	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
322	6-7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
324	17, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
325	22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
678	8	Names and/or information which may be used to determine identity Personal information	51 O.S. section 24A.8(B) 22 O.S. section 1015(B)

679	22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
681	22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
682	3-4, 10-12, 14-16, 18-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
683	7-11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
684	8-9, 14, 18-22, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
685	1-2, 6-7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
686	10-12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
687	3-5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
688	6-7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
689	9, 17-18, 20, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
690	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
691	20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
692	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
694	7, 10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
695	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
703	8-9, 13-14, 16-18, 20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
704	1-2	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
705	2-3, 5, 8, 11-12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
706	6-8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
708	4-8, 10, 12, 14, 18, 19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
709	9-11, 13, 15-16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
710	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
718	18-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
720	12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
721	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
722	4, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
723	2, 9-12, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
724	7, 10, 12, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
726	16-17, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
728	15, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
729	10, 14, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
730	2-3, 10, 13-14, 16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
731	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
732	19, 21, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
733	1, 10, 18, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
734	1, 13-14, 16-17, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
735	20-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
736	4-6, 9, 11, 13, 16, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
738	21-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
739	25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
740	26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

741	6, 8, 12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
742	3-4, 10-14, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
743	1, 7-8, 13-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
744	14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
746	17, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
750	4, 8-9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
752	11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
753	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
754	20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
755	1, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
760	4-6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
761	21-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
762	6-7, 11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
764	5-7, 9, 14, 18, 22-23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
765	15-18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
766	9-11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
767	5-6, 8, 10-12, 20, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
771	8, 11, 13, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
774	10, 12, 14, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
775	22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
776	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
777	11-12, 18-20, 22, 24-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
778	1, 8-10, 12, 19, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
779	1, 3, 6, 9-11, 15, 17, 19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
780	26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
781	1, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
782	23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
784	23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
787	4-6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
788	9, 17, 19-20, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
789	3, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
790	26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2054		Name	22 O.S. section 1015(B)
2055	2, 10, 15, 17-18, 21, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2057	9, 12, 15-16, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2058	7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2060	3-54, 7, 9, 12-14, 16-17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2061	8-9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2062	10, 20-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2064	9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2065	10, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

2066	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2071	1, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2072	21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2194		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
2195		Name	22 O.S. section 1015(B)
2196	4, 10, 15, 17-18, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2197	1, 3, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2198	22-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2199	2-3, 5-8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2200	22-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2201	2, 3-6, 8-9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2203	20, 23-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2204	3-4, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2205	21, 23-24, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2206	1-2, 10-11, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2207	1, 3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2209	22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2211	1, 9-10, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2212	18, 24-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2213	12-13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2215	5-6, 9, 15-20, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2216	2, 8-9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2217	3-4, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2365		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
2366		Name	22 O.S. section 1015(B)
2367	2, 10, 15, 17-18, 22, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2368	5, 7-10, 12, 14-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2369	9-10, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2370	1, 6, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2371	5, 8, 12, 15-16, 18-19, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2372	7-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2373	18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2376	7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2377	3, 9, 11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2379	21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2380	16, 20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2381	10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2382	7, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2383	11, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2388	19, 24-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2389	1, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

2390	20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2836		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
2837		Name	22 O.S. section 1015(B)
2838	2, 11-13, 20, 22, 23, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2839	15-17, 19-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2840	3-4, 8, 19-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2841	1, 14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2842	14, 19, 23-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2843	2-3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2852	21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2853	7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2854	12	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2855	18-19, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2856	3-4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2857	24-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2858	6, 24, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2859	5, 9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2860	10-11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2863	11-14, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2864	1-2, 5, 7-8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
205		Name, Date of Birth, Home Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
206		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
207	2, 10, 15, 17-18, 21, 23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
208	3, 6, 9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
209	12, 14-17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
212	3, 6, 9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
213	16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
214	3, 5, 8, 13, -14, 17, 20-21, 23, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
215	1-2, 4, 6,	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
216	2-3, 5, 8-9, 14, 20-24, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
217	16-18, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
218	6-7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
224	17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
226	2, 5, 11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
229	4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
231	6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2230		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
2231		Name	22 O.S. section 1015(B)
2232	2, 10-12, 18-21, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2233	10, 23-24, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2234	1-2, 9-11, 15-16, 18, 21-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

2235	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2236	7, 12-13, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2239	24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2240	1, 5-8, 14-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2241	5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2242	1-2, 4-5, 7-9, 22-24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2243	2-3, 6-7, 16	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2244	7-8, 12, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2245	1, 8-9, 19-20, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2248	15-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2249	9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2250	2	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2251	3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2255	17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2256	1, 4, 6-7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2258	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2262	20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2263	1-3, 12-13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2265	10, 13-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2266	1-3, 10-11, 13, 19-22, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2267	4-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2269	2-3, 19-20, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2270	16, 24-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2271	2-3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2276	1-2, 10-11, 18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2277	3-4, 10-12, 14-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2278	21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2279	13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2282	3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2283	26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2284	1, 3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2288	24-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2289	3, 10-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
232		Name, Date of Birth, Home Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
233		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
234	2, 10, 15, 17-18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
235	9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
236	6-8, 10-11, 19-22, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
237	3	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
239	23-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
240	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

241	12, 15, 20-21, 24-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
242	1, 12-13, 19-20,	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
245	22, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
246	11, 20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
248	24, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
249	1, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
131		Date of birth, home address, telephone number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
133	2, 10, 16, 18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
134	1, 3, 5, 6-12, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
135	21-22, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
136	1-3, 11-12, 17-19, 22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
137	7-8, 18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
139	2, 7-8, 21-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
140	1-2, 5-6, 9-11, 23, 25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
141	3, 9-11	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
142	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
146	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
147	1, 6-7, 18-19, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
148	3-6, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
150	6-8, 12-14, 20, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
151	1-2, 9-10, 19-21, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
152	4, 6	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
153	1, 3-4, 7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
154	6-7, 24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
155	16, 19, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
156	2, 5-6, 13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
157	2, 7	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
159	2, 11, 13, 16, 18-21, 23, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
160	1-3, 17, 20, 25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
161	1, 4-5, 11, 17-20, 22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
162	9, 17, 17, 22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
163	2-3, 8-10, 16-17,	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
165	2-3, 20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
166	1-2, 19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
167	12, 20, 22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
168	3, 6, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
169	1-2, 19-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
170	3, 11-12, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
171	18-19, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
172	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
173	20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

174	14-15, 17-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
175	1-3, 5-8, 10-11, 14-15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
176	5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
178	9, 11-13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
179	6, 8, 13, 15-16, 20-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
180	8-9, 11, 13-15, 18-21, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
181	5-7, 9, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
182	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
184	13	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
185	24	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
186	14-16, 18, 23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
189	9, 11, 18, 21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
190	8	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
191	2, 17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
192	17	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
196	4	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
598		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
599-632		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2108	22-23	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2109	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2110	14, 16-18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2111	3, 15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2112	14, 19, 21-22	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2114	10-12, 19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2115	20-25, 31	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2116	1, 7-8, 13-14	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2118	9	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2119	28	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2120	12-13, 19, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2121	30	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2124	18	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2128	26-28	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2129	2, 14, 18-20	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2130	2	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2131	25-26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2138	25-26, 29-30	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2139	30-31	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2140	1-3, 5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2141	31	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2142	1	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2143	20-21	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)

2148	16-17, 19, 24-25	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2161	31	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2162	2-3, 5-7, 9-10	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2640		Name, Date of Birth, Address, Telephone Number, Social Security #	22 O.S. section 1015(B), 74 O.S. 840-2.11
2641		Name	22 O.S. section 1015(B)
2642	2, 8, 10, 16, 18-19	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2644	15	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2645	2-3, 26	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2650	2-3, 5	Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2822		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)
2823		Names and/or information which may be used to determine identity	22 O.S. section 1015(B)