



January 29, 2025

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Re: Public Records Request – Indiana University

Dear Indiana University public records office,

Pursuant to Indiana’s Access to Public Records Act, Ind. Code § 5-14-3-1 *et seq.*, I write to request copies of the following records related to the Indiana University Observatory on Social Media (OSoMe). As used in these requests, “record” has the broadest definition under the Act and means “any writing, paper, report, study, map, photograph, book, card, tape recording, or other material that is created, received, retained, maintained, or filed by or with a public agency and which is generated on paper, paper substitutes, photographic media, chemically based media, magnetic or machine readable media, electronically stored data, or any other material, regardless of form or characteristics.” Ind. Code § 5-14-3-2(r). “Communication” means any public record that reflects interaction between two or more people, including memos, emails, text messages, iMessages, WhatsApp messages, and any other means of correspondence.

All requests are limited to the timeframe from January 1, 2020 to the present. Unless otherwise noted, all requests are limited to the custodians Filippo Menczer, Caitlin Watkins, Ben Serrette, Brea Bailey, Sarah Beverton, Pasan Kamburugamuwa, Nick Liu, and James McCombs.

1. All records containing the terms “National Science Foundation” or “NSF” or any other known abbreviations or names to refer to the National Science Foundation.
2. All records referencing the Multidisciplinary University Research Initiative (MURI).
3. All records referencing the Defense Advanced Research Projects Agency (DARPA).

4. All communications between any of the above-listed custodians and federal government officials or employees with a “.gov” or “.mil” email address.
5. All records that reference the Knight Foundation.
6. All communications between any of the above-listed custodians and officers or employees of the Knight Foundation with a “knightfoundation.org” email address or other email address known to belong to the Knight Foundation.
7. All communications between any of the above-listed custodians and officers or employees of Meta, Facebook, Instagram, Alphabet, Google, YouTube, Snap, Twitter, X Corp., or Reddit.
8. All records referencing the Coordiscope tool, Hoaxy tool, Facebook News Bridge, and Fakey for the custodians Filippo Menczer, Caitlin Watkins, and Ben Serrette.
9. All .ppt files or other presentation files referencing the Coordiscope tool, Hoaxy tool, Facebook News Bridge, and Fakey.
10. All records returned by a search of the terms “censor!”, “free speech”; “First Amendment”; and “throttle!”.

If you object to any request based on the grounds allowed in the Access to Public Records Act, please email me so that I may clarify my request. I respectfully request the University waive all fees associated with this request because all records can be provided electronically. Alternatively, I agree to pay any reasonable fees not exceeding \$1,000 that are permitted by law for the processing of this request. If you anticipate the fees will exceed \$1,000 please notify me by email before processing this request.

Please produce all records in their native electronic format with all associated metadata. Please send the response to this request via email to mhoffmann@ADFlegal.org.

Thank you for your attention in this matter. Should you have any questions or concerns, please do not hesitate to contact me via email.

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Sincerely,

Mathew W. Hoffmann
ALLIANCE DEFENDING FREEDOM