



American Civil Liberties
Union of Eastern Missouri
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St. Louis, MO 63108
T/314-652-3114
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www.aclu-em.org

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Joshua Campbell
Lobbyist

November 24, 2010

Mr. Chris Kline
Custodian of Records
Missouri Department of Corrections
2779 Plaza Drive
Jefferson City, Missouri 65102
Fax: 573/751-4099

Dear Mr. Kline:

Pursuant to the Missouri Sunshine Law (RSMo Chapter 610), I formally request copies of all the records listed in the Enclosure.

Because this records request is being submitted in the public interest and "is likely to contribute significantly to public understanding of the [] activities" of the Department of Corrections, we ask that you waive any fees or charge a substantially reduced fee pursuant to Mo. Rev. Stat. §610.026.1(1). However, should you decline to waive or reduce fees, please contact me to inform me of the cost prior to making copies if the cost will be greater than \$50. I can be reached at redditt@aclu-em.org or 314/652-3114.

According to the statute, this request should be acted upon as soon as possible, but in no event later than the third business day following receipt of this letter.

If you choose to deny the request, then you are required to respond in writing and state the statutory exception authorizing the withholding of all or part of the public record and the name and title or position of the person responsible for the denial.

Thank you for your assistance on this matter.

Respectfully,

A handwritten signature in black ink that reads 'Redditt O. Hudson'. The signature is written in a cursive, flowing style.

Redditt Hudson

Enclosure

Enclosure:

We seek all records¹ in the possession of Department of Correction (DOC), regardless of who produced them, regarding sodium thiopental, including but not limited to:

1. All records indicating the DOC's current inventory of sodium thiopental, also known as Sodium Pentothal, thiopental, thiopentone sodium, or Trapanal (hereinafter simply "sodium thiopental").
2. All records indicating the expiration date of all sodium thiopental in DOC's current inventory.
3. All records indicating the source of all sodium thiopental in DOC's current inventory.
4. All records indicating the shipment dates of all sodium thiopental in DOC's current inventory.
5. All records indicating who authorized the purchases of sodium thiopental in the DOC's current inventory.
6. All records indicating how much the state paid for the sodium thiopental in the DOC's current inventory, how payment was made, and from what account.
7. All records regarding efforts by DOC, either successful or unsuccessful, to obtain sodium thiopental over the past five (5) years until today (November 24, 2010)..
8. All records relating to the disposition of all expired sodium thiopental over the past five (5) years until today (November 24, 2010).
9. Copies of phone records indicating calls between from DOC and Hospira Inc. of Lake Forest, IL, including but not limited to the following numbers: Customer care: 1-877-9HOSPIRA (1-877-946-7747); 1-800-441-4100; 224-212-2000; 1-800-615-0187; etc.
10. Copies of all email records between DOC and Hospira (domain name: @hospira.com)
11. Copies of all packaging, labels, instructions or documents that accompanied the sodium thiopental in DOC's current inventory, including copies of all writings on the packages containing the sodium thiopental in DOC's current inventory.
12. Copies of package inserts for the sodium thiopental in DOC's current inventory and copies of all writings on the packages containing the sodium thiopental in DOC's current inventory.

¹ The term "records" as used in this request is defined as, "any record, whether written or electronically stored, retained by or of any public governmental body including any report, survey, memorandum, or other document or study prepared for the public governmental body by a consultant or other professional service paid for in whole or in part by public funds, including records created or maintained by private contractors under an agreement with a public governmental body or on behalf of a public governmental body ... Any document or study prepared for a public governmental body by a consultant or other professional service as described in this subdivision shall be retained by the public governmental body in the same manner as any other public record". Mo. Rev. Stat. § 610.010(6).

1)
2)

Date/Time: Nov. 24. 2010 1:52PM

File No. Mode	Destination	Pg (s)	Result	Page Not Sent
2164 Memory TX	15737514099	P. 2	OK	

Reason for error

E. 1) Hang up or line fail

E. 2) No answer

E. 3) Exceeded max. E-mail size

E. 2) Busy

E. 4) No facsimile connection



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Respectfully,

Redditt O. Hodson

Redditt Hodson

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