



FREEDOM OF INFORMATION (FOI) REQUEST ENGINEERING

A Practical Guide to Forcing Government Accountability

*There are those who heed the warning "don't mess with Texas,"
and then there are those who do the exact opposite.*

Activist Chaz Stevens is in the second group.

- Wynne Davis, NPR

First Edition

2026



Dedicated to those who give their time, treasure, and
tears protecting our Civil Rights.



This guide is for informational purposes only and does not provide legal advice. Public records laws vary by jurisdiction and application. Readers are responsible for compliance with applicable laws and should consult qualified counsel when necessary.

First edition: January 2026

Revolt Training, Deerfield Beach, FL, USA

[REVOLT.Training](https://www.revolt.training)



Foreword

This playbook exists for one reason: **process beats protest.**

Public records laws are not a courtesy. They are a control surface. When used precisely, they expose how power actually operates—who decides, under what authority, and whether the rules on paper match the behavior in practice.

The methods outlined here are not about volume, outrage, or theatrics. They are about **engineering pressure** through lawful, documented, repeatable means. Every rule in this playbook is designed to keep the work inside public lanes: written records, formal decisions, and institutional accountability.

If you are looking for shortcuts, undercover stunts, or viral gotchas, this is not that document. If you are looking to force clarity, surface contradictions, and constrain discretion using the government's own rules—read on.

This is not a guide to Freedom of Information law.

This playbook assumes baseline competence in public-records practice. It does not replace foundational FOI training on records literacy, newsroom tactics, or good-faith access strategies. Those skills are covered extensively elsewhere—most notably in David Cuillier's *The Art of Access*. What follows begins where those guides end: when lawful access encounters discretion, exception creep, or institutional resistance.

The Stevens Method: Applied FOI Pressure Engineering

The methods in this playbook are not theoretical.

They are drawn from decades of applied use by Chaz Stevens, who has repeatedly used public-records laws to expose informal governance, selective enforcement, and procedural shortcuts at the local and state level. His work has relied not on insider access or leaks, but on disciplined use

REVOLT TRAINING

of FOI to force agencies to document how decisions were actually made—or to admit, in writing, that required processes were never followed.

That approach has produced measurable outcomes: policy reversals, abandoned practices, public admissions of error, investigations, litigation leverage, and sustained media scrutiny. In multiple jurisdictions, FOI-generated records obtained through this method have become the backbone of complaints, lawsuits, legislative challenges, and public reporting.

The lesson is simple: **systems don't fail because they are confronted; they fail when they are required to account for themselves in writing.** This playbook distills that experience into a repeatable framework. It does not promise records. It produces pressure.

The Stevens Method requires skill, judgment, and follow-through—and does not guarantee easy wins.

Important Disclaimer (IANAL)

I am **not a lawyer**. This playbook does not provide legal advice, nor does it substitute for the judgment of qualified counsel.

The material here reflects decades of practical experience, statutory text, published guidance, and documented outcomes from real public-records work. Public records laws vary by jurisdiction, and their application can depend on facts, timing, and context.

Nothing in this document should be interpreted as encouraging unlawful conduct, evasion of statutes, or misuse of public records laws. Readers are responsible for understanding and complying with the laws applicable in their jurisdiction and should consult an attorney when legal interpretation or risk assessment is required.

This playbook is about **discipline and method**, not legal representation.

Purpose and Use

REVOLT

TRAINING

This playbook treats public-records law as an accountability instrument, not a blunt force tool. The methods described here are designed to operate within the spirit and letter of access statutes: to clarify how decisions are made, to test whether stated procedures were followed, and to document outcomes accurately. While the framework emphasizes precision and pressure, it presumes careful judgment, factual restraint, and responsible interpretation of both records produced and records that do not exist. Used properly, these techniques strengthen—not undermine—the legitimacy of public-records law by reinforcing its core function: making government decision-making visible, reviewable, and accountable.

Readers seeking a comprehensive introduction to records identification, newsroom practice, and cooperative access strategies should consult foundational works such as *The Art of Access* before applying the pressure-engineering methods described here.

Notes

While statutes vary by jurisdiction, the decision-paper-trail relationship is consistent across modern public-records regimes.

International users should adapt these methods to their jurisdiction's statutory structure; comparative resources are cited in the bibliography.

In practice, frontline records custodians are rarely the source of access failure. Breakdowns typically occur upstream—through administrative guidance, political sensitivity, or unwritten norms that displace formal policy. This playbook targets those systemic fault lines, not individual clerks.

This method presumes the ability to identify the governing policy, ordinance, statute, or written practice associated with a decision. If you cannot anchor a request to a rule, the problem is not drafting—it is target selection.

This is not a document for the casual seeker; it is for the systems debugger. It replaces "outrage and theatrics" with disciplined, repeatable engineering. It is a sophisticated evolution of open-government advocacy that turns the government's own bureaucracy against its worst instincts.

REVOLT TRAINING

Acknowledgments

This work is informed by decades of rigorous public-records advocacy and scholarship. Special thanks are due to David Cuillier of the Joseph L. Brechner Freedom of Information Project for his sustained, principled work in advancing open government, educating practitioners, and defending the public's right to know.

This playbook diverges deliberately from traditional access training only after those principles fail under institutional pressure. Any errors in application or interpretation are mine alone.

His writing, teaching, and litigation have shaped how journalists, lawyers, and citizens understand access law—not as a curiosity, but as a structural safeguard. The emphasis throughout this playbook on lawful acquisition, written records, and institutional process owes a clear intellectual debt to that tradition.



Table of Contents

FOI Request Engineering Playbook 9

Reusable FOI Request Template Decision-Focused, Constraint-Based 13

FOI Review & Rewrite Prompt 15

Using AI Without Screwing Up Your Request 17

Example: AI Is a Drafting Tool, Not a Decider 20

Case Study: Pompano Beach 22

Citations 27



FOI Request Engineering Playbook

How to Draft Public Records Requests That Force Accountability

Public records laws don't exist to satisfy curiosity. They exist to expose how decisions are made. A good Freedom of Information (FOI) request doesn't ask for information — **it tests whether a process was followed lawfully.**

This playbook shows how to engineer FOI requests that create leverage, surface contradictions, and constrain agency discretion.

This framework is designed to apply pressure without relying on undercover tactics, private access, or surreptitious recording — keeping investigations lawful, publishable, and defensible.

Rule 1: Start With the Decision, Not the Document

Every effective FOI request begins with a **decision node**.

Ask:

- What decision was made?
- Who had authority to make it?
- What policy, ordinance, or statute governed it?

If you cannot identify a decision, you cannot engineer a meaningful request.

No decision = no leverage.

Rule 2: Infer the Mandatory Paper Trail

Lawful decisions generate records. Always.

Before drafting, complete this sentence:

REVOLT TRAINING

“If this decision was made lawfully, the following records must exist...”

Typical artifacts include:

- Emails or messages discussing eligibility or approval
- Intake forms or applications
- Determinations, approvals, or denials
- Internal guidance or criteria
- Calendars or meeting logs
- Exception or override justifications

Your job is not to guess what they *have*.

Your job is to identify what they *must* have.

Rule 3: Use “Records Sufficient to Show” Language

Avoid broad fishing requests. They invite delay and evasion.

Instead, use constraint-based phrasing:

“Records sufficient to show how [Decision X] was evaluated and approved, including but not limited to...”

This does two things:

1. Forces production of decision-critical records
2. Makes “no records” a substantive admission, not a dodge

“Records sufficient to show” language is intentionally constraining. A narrow production is not a defect; it is a claimed description of the process. Subsequent contradictions are resolved through follow-up requests, not broader fishing.

This language is your leverage.

Rule 4: Tie Every Request to a Process Step

Each bullet in your FOI request should map to a step in the decision process.

Example:

- Eligibility determination
- Residency or qualification verification
- Staff review or recommendation
- Final approval or denial
- Exceptions or deviations from policy

If a step exists, a record exists. If they can't produce it, the process failed.

Rule 5: Anticipate the Response — Before You File

FOI engineering is incomplete without outcome planning.

Every response falls into one of four categories:

- **Production** » compare records to policy
- **No records** » procedural violation or informal process
- **Delay** » discretionary gatekeeping
- **Over-redaction** » abuse of exemptions

You are not done when records arrive.

You are done when the response constrains future denials.

Institutional Pushback Is Data

Fee demands, delay tactics, and “burdensome” objections are not neutral responses. They are indicators of discretionary stress. Document them. They often reveal more about process fragility than the records themselves.

REVOLT

TRAINING

Each response category can be escalated through appeals, oversight complaints, or litigation; those pathways are jurisdiction-specific and beyond this playbook's scope.

Rule 6: FOI Is a Pressure Tool, Not a One-Off

Single requests educate. Structured requests force change.

Well-engineered FOI:

- Boxes agencies into consistent explanations
- Makes selective enforcement visible
- Converts informal norms into formal contradictions
- Builds an evidentiary record without discovery

This is not activism. It's systems debugging.

Final Principle

Don't ask:

"What records do you have?"

Ask:

"What records must exist if you followed your own rules?"

That question is where FOI stops being passive and starts being dangerous — legally, ethically, and institutionally.



Reusable FOI Request Template

Decision-Focused, Constraint-Based

This template is designed to test whether a specific government decision was made lawfully by forcing production of the records that *must* exist if the process was followed.

Subject: Public Records Request — Records Sufficient to Show Decision Process

To the Custodian of Records,

Pursuant to applicable public records law, I request the following records in electronic format.

This request concerns [clearly identify the decision or action], which occurred on or about [date or date range], and was governed by [cite policy, ordinance, statute, or written procedure if known].

Please produce records sufficient to show:

1. **How eligibility or qualification was evaluated** for this decision, including any criteria applied or verified.
2. Who reviewed or participated in the evaluation, including staff, officials, or contractors.
3. Any intake materials, applications, or submissions relied upon in making the decision.
4. Any determinations, approvals, denials, or recommendations generated as part of the process.
5. **Any internal guidance, instructions, or criteria** used to interpret or apply the governing policy.
6. **Any exceptions, overrides, or deviations** from standard procedure, including the justification for such actions.
7. **Communications** (including emails, messages, or memoranda) discussing the decision, eligibility, or process.

If no records exist for any category above, please confirm that no such records were created or maintained.

REVOLT TRAINING

If any portion of this request is denied or redacted, please identify the specific exemption relied upon and provide all reasonably segregable portions of responsive records.

Thank you for your attention to this request.

Sincerely,

[Name]

[Contact Information]

Use Note:

Each numbered item corresponds to a **mandatory process step**. If they cannot produce records, the issue is not access — it is compliance.



FOI Review & Rewrite Prompt

For Training Projects or AI-Assisted Review

This prompt trains a reviewer (human or AI) to diagnose weak FOI requests and rewrite them into decision-constraining instruments.

Prompt:

You are an expert in public records request engineering.

Your task is to review the following FOI / public records request and rewrite it to maximize procedural leverage and accountability.

When reviewing, apply the following rules:

1. Identify the **specific government decision or action** at issue. If it is vague or missing, infer the most likely decision based on context.
2. Determine what **records must exist** if that decision was made lawfully under normal procedures.
3. Rewrite the request using “**records sufficient to show**” language rather than broad “any and all records” phrasing.
4. Ensure each requested record maps to a **distinct step in the decision-making process** (eligibility, review, determination, exception, communication).
5. Remove fishing language and narrow the request so that:
 - Production exposes consistency, or
 - “No records” becomes a substantive admission.
6. Preserve a professional, neutral tone suitable for statutory compliance.

Output the result as:

- A short explanation of the weaknesses in the original request (bullet points)
- A fully rewritten FOI request ready to file



FOI Request to Review:

[Paste request here]

Training Note:

This prompt is not about getting *more* records.

It is about making noncompliance visible and deniable explanations impossible.



Using AI Without Screwing Up Your Request

AI Is a Power Tool, Not a Brain

AI doesn't break public records laws. Bad requesters do.

Used correctly, AI accelerates precision. Used lazily, it manufactures hallucinations, contaminates the record, and gives agencies an excuse to deny, delay, or gaslight. This playbook assumes you are using AI as a **tool**, not a substitute for judgment.

Consistent with long-standing FOI training guidance, AI tools are most dangerous for novice requesters who lack the experience to detect fabricated statutes, imaginary record classes, or procedural hallucinations.

Here's how to do it without embarrassing yourself—or poisoning your case.

Rule One: Human-in-the-Loop Is Not Optional

AI drafts. Humans decide.

No AI system understands:

- how your agency actually stores records,
- which custodians lie off the org chart,
- where discretion creeps in under the guise of “no responsive records.”

If you send an AI-generated request without review, you deserve the outcome.

Your job is to:

- sanity-check every factual assertion,
- verify every statutory citation,
- confirm every records class actually exists.

REVOLT

TRAINING

AI is a junior assistant with confidence problems. Treat it accordingly.

Rule Two: Constrain the Prompt or Expect Fiction

Hallucinations don't appear randomly. They appear when **you under-specify the system under test**.

Vague prompts produce invented policies, imaginary record types, and statutory mashups that never existed. Agencies notice. They exploit that.

Your prompts must be bounded by:

- **Known law** (statute, ordinance, rule — cited correctly),
- **Named custodians** (by title, not vibes),
- **Defined records** (documents that already exist),
- **Finite time windows** (never “all records”).

If the prompt allows interpretation, the output will invent structure. That invention becomes your liability the moment it leaves your keyboard.

Rule Three: Treat Hallucinations as a Diagnostic Signal

When AI makes something up, don't just delete it. Ask *why it had to*.

Hallucinations usually indicate:

- ambiguous records architecture,
- unclear custodial responsibility,
- sloppy institutional documentation,
- or your own imprecision.

Fix the system description. Tighten the ask. Narrow the scope.

REVOLT

TRAINING

This mirrors FOI reality: agencies deny most effectively where process boundaries are fuzzy. AI is exposing the same fault lines—just faster.

What This Is Not

This is not a shortcut for novices. This is not a volume generator. This is not a way to outsource thinking.

If you don't already understand how FOI fails in practice, AI will make you worse, not better.

The Bottom Line

AI doesn't replace expertise. It amplifies it—or exposes its absence.

Used correctly, AI helps you:

- draft cleaner requests,
- surface internal contradictions,
- standardize pressure across agencies,
- and move faster without sacrificing accuracy.

Used lazily, it hands agencies an excuse to dismiss you.

The difference is not the model. It's the operator.



Example: AI Is a Drafting Tool, Not a Decider

Original Weak Request (Human-Written)

Please provide any and all records related to the approval of invocation speakers at city commission meetings over the past five years, including emails, policies, and communications.

Why It Fails:

- No decision identified
- No governing rule cited
- Overbroad time range
- Invites delay, fees, and “no records” games

AI-Assisted Rewrite (Unreviewed)

Please provide all documents, emails, policies, and communications sufficient to demonstrate how invocation speakers were evaluated and approved by the City Clerk pursuant to applicable First Amendment and municipal code requirements.

Problem Introduced by AI:

- Invents legal framing (“First Amendment”)
- Assumes clerk authority without verification
- Still vague on decision timing and rule

Human Correction Pass (Filed Request)

Please produce records sufficient to show how eligibility for invocation speakers at City Commission meetings was evaluated and approved on or about [date range], including:

- Any written requests invoking the residency exception set forth in [cite ordinance or policy, if known];

REVOLT

TRAINING

- Any determinations, approvals, or denials applying that exception;
- Records showing how eligibility was verified;
- Communications discussing invocation eligibility or application of the policy.

If no records exist for any category above, please confirm that no such records were created or maintained.

What Changed:

- Anchored to a specific decision
- Removed invented legal theories
- Bounded the records universe
- Converted “no records” into a substantive admission

Takeaway

AI accelerated the draft.

Human judgment made it defensible.

Agencies may eventually attempt to profile or dismiss AI-assisted requests. That does not change the legal analysis: a compliant request stands or falls on content, not authorship.



Case Study: Pompano Beach

Selective Enforcement Under Written Rules

This was not a lawsuit. Not a demand for access. Not a First Amendment stunt.

It was a process test.

The Rule on the Books

The city maintained a written policy governing who may deliver invocations at commission meetings.

Key constraint:

Participation was limited to religious organizations **located within city limits**.

One exception existed. Out-of-city congregations could participate **only if** a city resident made a **written request**.

That matters.

A written rule with a written exception creates a **mandatory paper trail**.

The Question Being Tested

Does the city apply this rule neutrally?

Or does the rule bend when sensitivity increases?

Intent was irrelevant. Outcome was irrelevant.

Only process mattered.

Step 1: Infer the Required Records

If the policy were followed as written, the city must possess:

- Written resident requests invoking the exception
- Staff or clerk determinations approving or denying those requests
- Records showing how eligibility was verified
- Communications discussing invocation eligibility

No speculation. These records either exist—or the process never happened.

Step 2: Engineer the Request

The public records request was drafted to be:

- Narrow
- Neutral
- Decision-focused

The request followed mainstream best practices consistent with established FOI guidance: neutral tone, narrow scope, statutory grounding, and no allegation of bias. The failure that followed was therefore diagnostic—not tactical.

It did **not** allege bias. It did **not** reference denial. It asked only for records sufficient to show how the policy was applied.

This matters.

The request tested compliance without accusation.

Step 3: Introduce a Control Group

A favored comparator was identified.

REVOLT

TRAINING

An invocation speaker affiliated with an **out-of-city congregation** who had been approved.

This established the baseline.

If the exception process was real, the favored group would have paperwork.

Step 4: Compare the Paper Trail

What the city produced:

- Lists of invocation speakers
- No written resident requests
- No determinations applying the exception
- No eligibility documentation

Separately, a city official explained approval via “active presence.”

That phrase appears nowhere in the policy.

It was invented after the fact.

The Asymmetry

Here is the diagnostic failure:

- **Favored group**
 - Approved
 - No paperwork
 - Justified retroactively
- **Disfavored group**
 - Denied

REVOLT

TRAINING

- Cited lack of paperwork
- Held to a standard never applied to others

This is not discretion. This is selective enforcement.

Why This Is Bulletproof

Agencies can defend strict rules. They can defend flexible rules.

They cannot defend **rules applied in only one direction.**

Once documentation is optional for approval but mandatory for denial, neutrality collapses.

No motive required. No ideology alleged. The record does the work.

Diagnostic Outcome

This FOI request did not “win” access.

It produced something better:

- Proof of **process drift**
- Proof of **off-ledger decision-making**
- Proof that written rules were not operational rules

That is leverage.

Transferable Lesson

This pattern repeats everywhere:

- Public forums
- Procurement



- Grants
- Boards and commissions
- Permits
- Social-media moderation

Any system with exceptions can be tested this way.

Final Takeaway

FOI is not about records.

It is about forcing institutions to choose:

Document the rule you claim to follow —or— Admit you made it up as you went

Pompano chose the second.



Citations

- Jonathan Anderson & Sarah K. Wiley**, *Freedom of the Database: Auditing Access to Structured Data*, 3 **J. Civic Info.** 30 (2021).
- Laura Cicatiello et al.**, *Response, Awareness, and Requester Identity in FOI Law: Evidence from a Field Experiment*, 220 **J. Econ. Behav. & Org.** 12 (2024).
- David Cuillier**, *Honey v. Vinegar: Testing Compliance-Gaining Theories in the Context of Freedom of Information Laws*, 15 **Comm'n L. & Pol'y** 203 (2010).
- David Cuillier & Charles N. Davis**, *The Art of Access: Strategies for Acquiring Public Records* (2d ed. 2020).
- Ayse Eldes**, *Government Transparency and Data: FOIA Evidence from Law Enforcement Agencies*, 5 **Minn. Undergraduate Rsch. & Acad. J.** (2022).
- Paul Lagunes & Esteban Pocasangre**, *Dynamic Transparency: An Audit of Mexico's Freedom of Information Act*, 97 **Pub. Admin.** 265 (2019).
- Gregory Michener et al.**, *Googling the Requester: Identity-Questing and Discrimination in Public Service Provision*, 33 **Governance** 249 (2020).
- Gregory Michener, Evelyn Contreras & Irene Niskier**, *From Opacity to Transparency? Evaluating Access to Information in Brazil Five Years Later*, 52 **Rev. Admin. Pública** 610 (2018).
- Open Society Inst.**, *Transparency & Silence: A Survey of Access to Information Laws and Practices in Fourteen Countries* (2006).
- Rodrigo Piñeiro Rodríguez & Cecilia Rossel**, *A Field Experiment on Bureaucratic Discretionary Bias under FOI Laws*, 35 **Gov't Info. Q.** 418 (2018).
- Brett Posner-Ferdman & David Cuillier**, *Dark Deserts: Newspaper Decline and Its Relation to Government Non-Compliance with Public Records Laws*, **News Res. J.** (2025).

REVOLT TRAINING

Steven Price, *The Official Information Act 1982: A Window on Government or Curtains Drawn?* (N.Z. Ctr. for Pub. L. Occasional Paper No. 1, 2006).

Jennifer L. Selin & Jordan M. Butcher, *How Free Is Information? Transparency in State Government*, **26 J. Legis. & Pub. Pol'y** 985 (2024).

Peter Spáč et al., *Freedom of Information and the Volume of Requested Data: An Experimental Study*, **42 Gov't Info. Q.** 102030 (2025).

Peter Spáč, Petr Voda & Jozef Zagrapan, *Does the Freedom of Information Law Increase Transparency at the Local Level? Evidence from a Field Experiment*, **35 Gov't Info. Q.** 408 (2018).

A. Jay Wagner, *Piercing the Veil: Examining Demographic and Political Variables in State FOI Law Administration*, **38 Gov't Info. Q.** 101541 (2021).

Ben Worthy, Peter John & Michal Vannoni, *Transparency at the Parish Pump: A Field Experiment to Measure the Effectiveness of Freedom of Information Requests in England*, **27 J. Pub. Admin. Rsch. & Theory** 485 (2017).