



September 16, 2015

**SENT VIA FEDERAL EXPRESS**



**Re: Tennessee Open Records Act Request**

Dear Superintendent [REDACTED]

On behalf of the American Center for Law & Justice (“ACLJ”), a § 501(c)(3) non-profit law firm dedicated to the defense of constitutional liberties secured by law, this request for records is made pursuant to the Tennessee Open Records Act, Tenn. Code Ann. § 10-7-501 *et seq.* The Tennessee Open Records Act requires a response within seven (7) days, as required by § 10-7-503(B)(i). If access to the records requested will take longer, please contact the undersigned with information about when the ACLJ can expect copies of the requested records. According to the Tennessee Open Records Act, public records or files that are accessible include “all documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental agency.” § 10-7-503(a)(1).

**RECORDS REQUESTED**

The ACLJ is requesting copies of the following records:

- (1) Any and all records containing or otherwise concerning communications between and among any officials, employees, representatives, and/or agents of the [REDACTED] [REDACTED] Schools concerning any world religion.



- (2) Any and all records containing or otherwise concerning communications between and among ██████████ Schools, including any and all officials, employees, representatives, and/or agents thereof, and any third party, concerning any world religion.
- (3) Any and all records containing or otherwise concerning communications between and among any officials, employees, representatives, and/or agents of the ██████████ ██████████ Schools concerning the curriculum on social studies and/or world religions, including but not limited to the curriculum and/or curricular standards concerning Islam.
- (4) Any and all records containing or otherwise concerning communications between and among ██████████ Schools, including any and all officials, employees, representatives, and/or agents thereof, and any third party, concerning the curriculum on social studies and/or world religions, including but not limited to the curriculum and/or curricular standards concerning Islam.
- (5) Any and all records that give instruction, or address policies, regarding how curriculum concerning world religions, including specific world religions (*e.g.*, Judaism, Christianity, Islam), is created and/or chosen for presentation in the classroom.
- (6) Any and all records, including, *e.g.*, pacing guides, documenting the length of instruction time devoted to each topic concerning world religions, including which individual(s) determine(s) the length of instructional time devoted to each topic concerning world religions.
- (7) Any and all records concerning which individual(s) teach(es) social studies courses and/or any other course(s) referencing world religion within the ██████████ Schools, and all sources utilized in determining the curriculum for those courses.
- (8) Any and all curricular materials, including but not limited to textbooks, workbooks, online materials, handouts, lesson plans, study guides, assignments, tests, etc., used in social studies courses and/or any other course(s) referencing world religion within the ██████████ Schools.
- (9) Any and all records concerning field trips of any ██████████ Schools class(es) that include a visit to any religious site(s).

- (10) Any and all records concerning assignments or activities in which students of ██████████ Schools are asked and/or required to recite prayers and/or chants, speak in Arabic or other foreign language(s), or engage in any other speech and/or conduct associated with any world religion.
- (11) Any and all records containing information regarding Tennessee state mandated requirements/standards for social studies and/or other world religion courses, including, but not limited to, records concerning how curriculum and courses within ██████████ Schools are created and/or developed to meet those mandated standards and the individual(s) who approve(s) those courses and curriculum.
- (12) Any and all tests, quizzes, reviews, and assignments, including TCAP and any field tests, that contain any questions or references regarding world religions, including but not limited to Islam.

The ACLJ requests that responsive records be produced in native format, or the format most felicitous to an expedited production. Upon receipt of this request, please take all reasonable steps to preserve relevant public records while the request is pending.

If you deny any or all of this request, please cite each specific exemption you claim justifies the refusal to release the information and notify the ACLJ of the appeal procedures available under the law. Tennessee's Open Records Act requires a denial of the right to inspect or copy records provided for under § 10-7-503 to be made in writing within seven (7) business days of your receipt of this request. § 10-7-503(B)(ii).

The ACLJ is well qualified to analyze and disseminate this information to a large segment of the public. Furthermore, because the ACLJ is a non-profit, § 501(c)(3) organization dedicated to the defense of constitutional liberties secured by law, and will not resell the information disclosed in any form, there is no commercial interest at issue. As such, the ACLJ requests that the fee waiver required by § 10-7-506(c)(1) be applied to this request. However, if you deny this request for a fee waiver or reduction, please contact the ACLJ with the reasonable amounts, as well as the manner of calculating those fees, **prior to** any expenditure.

Thank you for your prompt attention to this Open Records request. Please send the requested records to:

American Center for Law & Justice



If you have any questions about this request, please do not hesitate to contact the undersigned at:



Sincerely,

A handwritten signature in cursive script that reads "Carly F. Gammill". The signature is written in black ink on a light-colored background.

Carly F. Gammill

Senior Litigation Counsel