

March 11, 2022

Chris Whitley
Public Information Officer
Hanover County Public Schools
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Ashland, VA 23005
cwhitley@hcps.us

Lisa Seward
School Board Attorney
Hanover County Public Schools
Hanover County Attorney's Office
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Virginia

701 E. Franklin Street
Suite 1412
(804) 644-8022
Richmond VA 23219
acluva.org

RE: FOIA Requests to the Hanover County School Board

Dear Mr. Whitley and Ms. Seward:

On behalf of the ACLU of Virginia, Equality Virginia, He She Ze and We, Side by Side, and the Hanover County NAACP, I write to request copies of all records related to the relationship between Hanover County Public Schools and Alliance Defending Freedom.

I request access as a citizen of the Commonwealth of Virginia to the following public records pursuant to the Virginia Freedom of Information Act, §2.2-3700 *et seq.* of the Code of Virginia and 52 U.S.C. § 20507(i):

1. *Any and all correspondence, including letters, emails, and text messages, between any member of the Hanover County School Board and any individual affiliated with Alliance Defending Freedom from March 2021 through the present.*

2. *Any and all typed or handwritten notes discussing any communication between any member of the Hanover County School Board and any individual affiliated with Alliance Defending Freedom from March 2021 through the present.*

3. *Any and all correspondence, including letters, emails, and text messages, between and among Hanover County School Board*

members discussing Alliance Defending Freedom from March 2021 through the present.

4. *Any and all correspondence, including letters, emails, and text messages, between any member of Hanover County Public Schools' senior leadership team and any individual affiliated with Alliance Defending Freedom from March 2021 through the present.*

5. *Any and all typed or handwritten notes discussing any communication between any member of Hanover County Public Schools' senior leadership team and any individual affiliated with Alliance Defending Freedom from March 2021 through the present.*

6. *Any and all correspondence, including letters, emails, and text messages, between and among any member of Hanover County Public Schools' senior leadership team or between any member of Hanover County Public Schools' senior leadership team and any member of the Hanover County School Board discussing Alliance Defending Freedom from March 2021 through the present.*

7. *All contracts, engagement agreements or letters, memorandums of understanding (MOUs), retainer agreements, or other professional service agreements entered into between the Hanover County School Board and/or Hanover County Public Schools and Alliance Defending Freedom from March 2021 through the present.*

Please note that all records relating to public business are subject to this request, regardless of whether they have been sent, received, or maintained on a private computer, phone, or other device.

Please provide the requested records or respond as required by state law (§2.2-3704B) within 5 days from your receipt of this letter. We would prefer to receive records digitally if that is available to your office. If records are only available in paper form or any other physical medium, please mail them to the address on this letterhead or advise me of a manner in which I may retrieve them.

Should transcription to a digital medium or any other activities required for retrieval and transmission of the requested records incur a cost of more than \$100, please provide me with an estimate before processing this request. In the estimate of costs, please



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separate any cost for accessing or searching for the records from the cost of duplication so I may decide whether to exercise my right to inspect the records during normal business hours before asking to have any records duplicated.

Should your office find the records requested exempt from disclosure or withheld for any reason, please identify the records withheld, the basis for withholding, and cite the authorities upon which you rely.

Thank you for your immediate attention to this matter. Please do not hesitate to email or call me if you have questions about our requests. My direct line is 804-523-2155 and my email is mgasparotto@acluva.org.



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Sincerely,
Mateo Gasparotto
Investigator
Citizen of Virginia

cc: Narissa Rahaman, Equality Virginia
nrahaman@equalityvirginia.org

Shannon McKay, He She Ze and We
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Jamie Nolan, Side by Side
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