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July 1, 2022

By Email

Tammy L. Smith
Operations & Management Consultant I
Office of the General Counsel
Florida Department of Education
325 West Gaines Street, Suite 1544
Tallahassee, Florida 32399
pr@fldoe.org

Re: *Public Records Request re: Civics Literacy Excellence Initiative (CLEI) Trainings*

Dear Ms. Smith,

Under Fla. Const. art. I, § 24(a), Fla. Stat. § 119.01 *et seq.*, and Fla. Exec. Order No. 07-242 (Nov. 15, 2007), on behalf of Americans United for Separation of Church and State and its members, we request that the Florida Department of Education provide copies of the public records described below.

Requested Documents

1. All documents and materials provided to or used by trainers or trainees at or in connection with Civics Literacy Excellence Initiative (CLEI) professional-development three-day trainings held or scheduled between June 20 and July 22, 2022, and advertised at <https://fdoecivicspd.com/>, including:
 - a. All slides and other materials that were or will be presented to trainees at the trainings. Please include all versions of the slides and presentation materials that contain scripts of or instructions on what the trainers say or should say during the trainings.
 - b. All scripts of or instructions on what the trainers say or should say during the trainings.
 - c. All other materials used by or provided to trainers during, in advance of, or after the trainings.
 - d. All other materials provided to trainees during, in advance of, or after the trainings.

2. All other documents and materials used to train Civics Literacy Excellence Initiative (CLEI) professional-development trainers on what they should teach or present at the trainings.
3. All correspondence concerning the curriculum, content, purposes, or goals of CLEI professional-development trainings, including:
 - a. internal correspondence among officials or employees of the Department of Education.
 - b. correspondence to or from any other person, including but not limited to personnel of Hillsdale College.
4. Except for contracts relating to the rental or use of space for the trainings, all contracts or agreements relating to CLEI professional-development trainings, including contracts relating to hiring trainers, developing materials, or planning instruction. Please include any documents attached to or incorporated in any contracts or agreements that you produce.
5. All available video and audio recordings of CLEI professional-development trainings, including any recordings of practice trainings.

These requests do not seek any records exempted under Fla. Stat. §§ 119.0711 or 119.0713.

Instructions

1. Per Fla. Stat. § 119.01(2)(e), please produce in electronic format all responsive documents that are available in that format by emailing them to us at luchenitser@au.org and bodaken@au.org, by electronic file transfer, or by mailing them to us on electronic media at:

Alex Luchenitser / Alex Bodaken
Americans United for Separation of Church and State
1310 L Street NW
Suite 200
Washington, DC 20005

Please mail copies of any documents that are available only in paper format to the same address. Electronic production, if possible, is preferable to mailed production.

2. Americans United for Separation of Church and State agrees to pay reasonable fees under Fla. Stat. § 119.07(4) of not more than \$100. If you estimate that the total fee for this request will exceed \$100, please inform us

of the amount of the estimated fee and obtain authorization before you incur costs above that amount.

3. Per Fla. Stat. § 119.07, we ask that our records request be “promptly” acknowledged and responded to. Specifically, we request that you produce all the requested documents within thirty days.
4. If some of the documents or document categories requested above will require a significantly longer document-gathering process than others, please produce the documents on a rolling basis, so that documents or document categories that require less time to gather are produced first.

* * *

Thank you for your prompt attention to this request. If you have any questions, do not hesitate to contact Alex Luchenitser and Alex Bodaken at (202) 466-3234 or luchenitser@au.org and bodaken@au.org.

Sincerely,

Alex Bodaken

Alex J. Luchenitser, Associate Vice President and Associate Legal Director
Alex Bodaken, Steven Gey Litigation Fellow