



August 23, 2022

VIA Electronic Delivery

Public Information Officer
Communications Department
Granbury ISD
217 N. Jones Street
Granbury, TX 76048
pio@granburyisd.org

Re: Texas Public Information Act Request

Dear Public Information Officer,

Pursuant to the Texas Public Information Act, Tex. Gov't Code § 552.001 *et seq.*, Democracy Forward Foundation, on behalf of Christopher J. Tackett, submits this request for records.

Records Requested

In an effort to understand and clarify how school officials use electronic messaging to conduct official business, we request the following records:

- All electronic messages pertaining to official business sent or received by Superintendent Dr. Jeremy K. Glenn, including but not limited to e-mails, text messages, and chats (including those conducted on messaging platforms like Signal and WhatsApp), regardless of whether they are sent or received using a private account or on a private device. E-mails sent or received via Dr. Glenn's official school district e-mail account may be excluded from this search.

The timeframe for this search should be from July 23, 2022 until the date of the search. Please note that, under Texas Local Government Code § 202.002, "a local government record subject to a request under [the Texas Public Information Act], may not be destroyed until the request is resolved." We therefore ask that you take steps to ensure that no responsive records are destroyed immediately following receipt of this request.

Please search for records regardless of format, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical materials. This request includes, without limitation, all correspondence, letters, emails, text messages, calendar entries, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes, or audio or video recordings of any meetings, telephone conversations, or discussions. In searching for responsive records, however, please exclude publicly available materials such as news clips that mention otherwise responsive search terms.

The Public Information Act requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. Tex. Gov't Code § 552.022. In the event that Granbury ISD wishes to

withhold any documents or portions of documents, it must generally ask for a decision from the Attorney General about whether that information is within the exception. Tex. Gov't Code § 552.301(a), *Thomas v. Cornyn*, 71 S.W.3d 473, 480 (Tex. App. – Austin 2002, no pet.). However, we agree to the redaction of information that is subject to mandatory or discretionary exceptions, provided such redactions are clearly labeled on the information we receive, and provided that doing so will not prejudice our ability to request the redacted information in a subsequent request and/or to challenge the appropriateness of the redactions. If Granbury ISD wishes to withhold any documents in full, it must nonetheless request a decision from the Attorney General; should the Attorney General find that the documents ought to be withheld, we further request a written statement from Granbury ISD asserting its wishes to withhold the requested information and a copy of the written communication to the Attorney General asking for a decision on the issue. Tex. Gov't Code § 552.301(d).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in a searchable, electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 10 business days as required by under the Texas Government Code. Tex. Gov't Code § 552.301(b). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If no decision from the Attorney General is requested and the information required by § 552.301(d)(e-1) is not provided to us within 10 business days, the information we requested is presumed to be subject to public disclosure and must be released. Tex. Gov't Code § 552.302.

Request for Fee Waiver

We request a waiver of document search, review, and duplication fees associated with processing records for this request, in accordance with Texas Government Code Section 552.267.

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Records received in response to this request will contribute to the public's understanding of how Granbury ISD officials conduct official business. Christopher Tackett routinely writes about and disseminates information regarding educational policy issues, including issues involving Granbury ISD.¹ Moreover, Mr. Tackett's counsel, Democracy Forward, has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes.²

¹ See, e.g., Christopher Tackett, <https://twitter.com/cjtackett>; ChrisTackettNow, <http://christackettnow.com/>.

² See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz & Jack Gillum, "Happy to Do

Mr. Tackett is not filing this request to further any commercial interest, and any information obtained as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

It”: *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 25, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit%20college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees’ war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen%20pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://apnews.com/article/aab79ba7af7e474db353621746aa60bd>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records “without delay,” Tex. Gov’t Code § 522.221(a), please contact John Lewis as soon as possible at jlewis@democracyforward.org or 202-601-2487.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ John Lewis _____

John Lewis
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