



207 East Buffalo Street, Ste 325  
Milwaukee, WI 53202  
(414) 272-4032  
aclu-wi.org

November 17, 2023

Dr. Michael Garvey, Superintendent  
Raymond School District  
2659 76<sup>th</sup> Street  
Franksville, WI 53126  
*via email to [garvmic@raymond.k12.wi.us](mailto:garvmic@raymond.k12.wi.us)*

**Re: Open Records Request regarding Principal Jeff Peterson**

Dear Dr. Garvey or school district records custodian,

The American Civil Liberties Union of Wisconsin is seeking information regarding communications between district administrators and school board members regarding Principal Jeff Peterson. The ACLU of Wisconsin submits this request pursuant to the Wisconsin Open Records Act, Wis. Stats. §19.35, to request copies of the following records:

1. All records of communications from the following Raymond Board of Education members from July 2021 - present regarding Mr. Peterson:
  - a. Audrey Kostuch, President
  - b. Janell Wise, Vice President
  - c. Gwen Keller, Clerk
  - d. Amanda Falaschi, Treasurer
  - e. Amy Helvick, Director
2. All records of communications from Raymond Superintendent Dr. Michael Garvey from July 2021 - present regarding Mr. Peterson.
3. All records from July 2021 - present regarding any investigation of Mr. Peterson for an alleged violation of school board policy or alleged "misconduct."
4. All records received, transmitted, collected and/or maintained by Raymond Board of Education members or district administrators which evidences, describes, or discusses the inclusion of LGBTQ+ issues in school curriculum or materials from July 2021 - present.

In this request, the term "records" includes all information recorded in any form whatsoever, including, but not limited to, papers, digital electronic media (such as computer discs, hard-drives, CDs, zip discs, and tape back-up), and analog recording media such as audio and video tape recordings). Additionally, records include communications from personal cell phones (including text messages) or email accounts to the extent board members or staff discussed work in their official capacity on such devices/accounts.

Note that Wisconsin law requires that requested documents be produced “as soon as practicable and without delay.” Wis. Stat. § 19.35(4)(a). The Wisconsin Department of Justice policy is that 10 days is ordinarily a reasonable time for response to an open records request. Wisconsin Department of Justice, *Wisconsin Public Records Law Compliance Outline* at 15 (October 2019).

I request that the documents be provided without charge pursuant to Wis. Stat. § 19.35(3)(e). The ACLU of Wisconsin is a not-for-profit organization dedicated to the protection of civil liberties and government accountability, and waiving fees is in the public interest. Should you decline to waive the charges, please inform us in advance if you expect that the costs of producing the requested documents will exceed \$50.

If there are any questions related to this request, please contact Amanda Merkwae at [amerkwae@aclu-wi.org](mailto:amerkwae@aclu-wi.org).

If you deny any or all of this request, I request the reasons for that denial in writing.

Thank you for your prompt attention to this matter.

Sincerely,

Amanda Merkwae

Advocacy Director  
ACLU of Wisconsin