



AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

Kentucky

May 30, 2019

VIA U.S. MAIL

Superintendent  
Anderson County Schools  
1160 Bypass North  
Lawrenceburg, KY 40342

RE: Request pursuant to Kentucky Open Records Act  
regarding Bible courses

325 W. Main Street  
Suite 2210  
Louisville, KY 40202

(502) 581-9746  
aclu-ky.org

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Organizer

Kate Miller  
Advocacy Director

Corey Shapiro  
Legal Director

Dear Superintendent:

On behalf of the ACLU and the ACLU of Kentucky, we write pursuant to Kentucky's Open Records Act, KRS § 61.870 *et seq.*, to request copies of certain public records that are "prepared, owned, used, in the possession of or retained by" Anderson County Schools ("the District"). See KRS § 61.870(2). Specifically, this request seeks copies of all public records relating to every Bible course offered within the District during the 2018-19 school year, as well as records relating to every Bible course that the District plans to offer in the future, including:

- 1) elective courses on the Hebrew Scriptures and the Old Testament of the Bible offered pursuant to KRS § 158.197(1)(a);
- ✓ 2) elective courses on the New Testament of the Bible offered pursuant to KRS § 158.197(1)(b);
- ✓ 3) elective courses on the Hebrew Scriptures and the New Testament of the Bible offered pursuant to KRS § 158.197(1)(c); and
- 4) any other course that uses the Bible as a text or that has Bible literacy as one of its aims, whether offered pursuant to KRS § 158.197 or otherwise.

This request includes the following categories of public records for every such course offered, planned, or discussed.

- 1) All District policies and procedures relating to:
  - ✓ a) any education, training, and certification requirements for course instructors;
  - ✓ b) course requirements, grading criteria, subject matter content, or other requirements for establishing the course; and



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- ✓ c) student selection for, or enrollment in, the course.
- ✓ 2) All class-specific materials for every such course, including but not limited to, lesson plans, assigned text(s), curriculum maps, syllabi, worksheets, homework assignments, quizzes, tests, exams, answer keys, displays, demonstrative aids, and video and/or audio presentations.
- ✓ 3) All employee training and/or educational materials relating to the course.
- ✓ 4) All communications (whether electronic or otherwise) sent to or from District officials regarding the content, structure, or instructional methods for any Bible course or potential Bible course, including but not limited to, communications from textbook publishers, Bible literacy curriculum providers or developers, religious institutions, or others.
- ✓ 5) All communications (whether electronic or otherwise) between any District official and any employee of the Kentucky Department of Education regarding any Bible course or potential Bible course.
- ✓ 6) All communications (whether electronic or otherwise) between any District official and any instructor or potential instructor of a Bible course, referring or relating to the course.
- ✓ 7) All District forms required to be filled out by students and/or parents to enroll in the course.
- ✓ 8) All communications (whether electronic or otherwise) referring or relating to any complaint or other concern about any Bible course.

To comply with this request, please email electronic copies of the requested records to [corey@aclu-ky.org](mailto:corey@aclu-ky.org). In the event that electronic copies are not available or cannot be made, you may send copies of the records to the ACLU of Kentucky's office at the address listed below, pursuant to KRS § 61.872(3). If you choose to withhold any documents responsive to this request, please note that KRS § 61.880(1) requires that you identify the specific exception "authorizing the withholding of the record and a brief explanation of how the exception applies to the record withheld."

Thank you in advance for your attention to this matter, and we look



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forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to read "Corey Shapiro", with a long horizontal flourish extending to the right.

Corey M. Shapiro  
Heather Gatnarek  
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