



July 1, 2021

South Kingstown School Department  
Attn. Interim Superintendent Ginamarie Massiello  
307 Curtis Corner Road  
Wakefield, RI 02879  
[gmasiello@sksd-ri.net](mailto:gmasiello@sksd-ri.net)  
[jouellette@sksd-ri.net](mailto:jouellette@sksd-ri.net)

Subj: Public Records Request – Course and Classroom Instruction and Materials

**SENT VIA U.S. MAIL & E-MAIL**

Dear Ms. Savastano:

The Goldwater Institute (“Institute”) represents Ms. Nicole Solas in requesting public records and information pursuant to Rhode Island’s Public Records Act, codified at R.I. Gen. Laws § 38-2-1, *et seq.* (“PRA”).

The Institute is a nonprofit organization that conducts research and analysis on public education in the United States, including on matters of academic transparency. The Institute also engages in public interest litigation on matters within its purview, including government transparency and accountability.

As you know, Rhode Island law and public policy require open and transparent government. To that end, Rhode Island has broad public records laws favoring disclosure of records made and kept by government agencies. *See* R.I. Gen. Law § 38-2-1 (“The public’s right to access to public [is] of the utmost importance in a free society. The purpose of this chapter is to facilitate public access to public records.”)

Pursuant to R.I. Gen. Law § 38-2-3, we respectfully request the following public records in your custody:

- 1. Lesson plans or course materials used or assigned at any school within the South Kingstown School Department in the 2020-2021 school year that include any of the following terms:**
  - a. “1619 Project”**
  - b. “Zinn Education Project” or “Howard Zinn”**
  - c. “Equitable Math”**
  - d. “Gender theory”**

- e. **“White privilege” or “whiteness”**
  - f. **“Systemic racism”**
  - g. **“CRT” or “Critical Race Theory”**
  - h. **“Ibram Kendi” or “Kendi”**
  - i. **“Robin DiAngelo” or “DiAngelo”**
2. **Records of all communications, including e-mail communications to or from any South Kingston School Department official, administrator, principal, teacher, teaching assistant, or counselor and any other person, from January 1, 2020 to the date of this request, that includes any of the following terms:**
  - a. **“1619 Project”**
  - b. **“Zinn Education Project” or “Howard Zinn”**
  - c. **“Equitable Math”**
  - d. **“Gender theory”**
  - e. **“White privilege” or “whiteness”**
  - f. **“Systemic racism”**
  - g. **“CRT” or “Critical Race Theory”**
3. **Any policy, regulation, or procedure adopted by the South Kingston School Department that includes any of the following terms:**
  - a. **“1619 Project”**
  - b. **“Zinn Education Project” or “Howard Zinn”**
  - c. **“Equitable Math”**
  - d. **“Gender theory”**
  - e. **“White privilege” or “whiteness”**
  - f. **“Systemic racism”**
  - g. **“CRT” or “Critical Race Theory”**
  - h. **“Ibram Kendi” or “Kendi”**
  - i. **“Robin DiAngelo” or “DiAngelo”**
4. **Records of all communications, including e-mail communications to or from any South Kingston School Department official, teacher, or other employee and “NE Basecamp,” or any person or entity that the Department knows to be affiliated with NE Basecamp, from January 1, 2020 to present, that includes the terms “CRT” or “Critical Race Theory.”**
5. **Copies of any request for proposals prepared by the South Kingston School Department or any school within the Department for any person or entity to conduct an “equity audit.”**
6. **Copies of any responses to any request for proposals prepared by the South Kingston School Department or any school within the Department for any person or entity to conduct an “equity audit.”**

Electronic production of records and information is preferable and acceptable.

I request your response as soon as possible, but no later than ten (10) business days, pursuant to R.I. Gen. Law § 38-2-3(e). If responsive records cannot be produced within ten (10) business dates, please contact me with your progress and expected completion date.

Additionally, if some records are available prior to the production of other records, please provide on a rolling or continuing basis as the records are available.

I am willing to pay \$100.00 for electronic copies of the public records requested. Please note, however, that no more than the “reasonable actual cost of providing electronic records” can be assessed. R.I. Gen. Law § 38-2-4(a). Should the anticipated costs of production exceed \$200.00, please provide an estimate of those costs and “a detailed itemization of the costs charged for search and retrieval.” *Id.* at (c)(d).

Should you have any questions regarding this request, please do not hesitate to contact me at (602) 462-5000 or [jriches@goldwaterinstitute.org](mailto:jriches@goldwaterinstitute.org).

Thank you for your prompt attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Jon Riches', written over a light blue horizontal line.

Jon Riches

Director of National Litigation & General Counsel  
Scharf-Norton Center for Constitutional Litigation  
at the Goldwater Institute