



HENNEOUS CARROLL LOMBARDO LLC

September 24, 2025

Via Electronic Mail: nicolesolas@gmail.com

Ms. Nicole Solas

Re: Response to Access to Public Records Act Requests

Dear Ms. Solas:

I am writing to you on behalf of the Barrington Public Schools in response to the following Access to Public Records Act requests that were received on September 16, 2025 and September 18, 2025 respectively, but for the purposes of the within cost estimate, shall be considered one request in accordance with R.I. Gen. Laws § 38-2-4:

Request No. 1

"1) Email correspondence of social studies teacher Ben Fillo fillob@barringtonschools.org from September 1, 2024 to present containing the word, "Trump."

2) All curriculum materials of Ben Fillo for all classes including but not limited to: instructional materials, supplementary materials, handouts, dittos, assignments, videos, links, resources, guides, worksheets, workbooks, prompts, and any other record used to teach and/or prepare to teach the young and impressionable minds of other people's children who are entitled to an education free from indoctrination."

Request No. 2

"This is a public records request for email correspondence of Ben Fillo (the teacher who celebrated the murder of Charlie Kirk on TikTok) since January 1, 2016 containing the word, "Trump."

Please be advised that the search for the requested email correspondence for the period of September 1, 2024 to the present yielded **789 emails**. Some of these documents contain personnel and/or personal individually identifiable



HENNEOUS CARROLL LOMBARDO LLC

records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. *See* R.I. Gen. Laws § 38-2-2(4)(A)(I)(b). With that in mind, the School Department estimates that it will take **26.3** hours to retrieve, review, redact and compile the requested documents. In accordance with R.I.G.L. § 38-2-4(b), the cost for such retrieval is fifteen (\$15.00) dollars per hour, with no cost for the first hour. As such, the cost associated with retrieving, reviewing, redacting, and compiling this component of Request No 1. is:

$$25.3 \text{ hours (1st hour free)} \times \$15.00 = \quad \mathbf{\$379.50}$$

With respect to the second component of your first request related to curriculum materials and the like, kindly be advised that in order to respond to your request and your September 16, 2025 clarification in which you confirmed that you were seeking all such materials from the time the individual started teaching until the present, the School Department will be required to search and retrieve information related to one hundred fifty-seven (157) courses taught over the course of fifteen (15) years, stored on three (3) different learning management systems. The School Department estimates that three (3) instructional materials, supplementary materials, handouts, dittos, assignments, videos, links, resources, guides, worksheets, workbooks, prompts and/or other curriculum or other records were used per class, per day for a total of two hundred seventy (270) resources per class. The following is the estimated cost associated with retrieving, reviewing, redacting and compiling the second component of Request No. 2:

Location of documents	# of classes	Estimated # of documents per class	# of minutes to locate	# of minutes to review	Total # of hours	Total cost at \$15/hour
Current system	46	270	3	3	1242.0	18,630.00
Previous systems	111	270	10	3	6,493.50	97,402.50
Total					=	\$116,032.50

Please note that resources protected by copyright law are exempt from production pursuant to Rhode Island General Laws § 38-2-2(4)(S) and 5 U.S.C. § 552(b)(4) and thus are not included in the above estimate.



HENNEOUS CARROLL LOMBARDO LLC

With respect to the documents responsive to Request No. 2, be advised that the search for the period of January 1, 2016 to September 1, 2024 yielded **1,438 emails**. As with the first part of Request No. 1 above, some of these documents contain personnel and/or personal individually identifiable records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. *See*. R.I. Gen. Laws § 38-2-2(4)(A)(I)(b). Therefore, the School Department estimates that it will take **47.9** hours to retrieve, review, redact and compile the requested documents. In accordance with R.I.G.L. § 38-2-4(b), the cost for such retrieval is fifteen (\$15.00) dollars per hour. As such, the cost associated with retrieving, reviewing, redacting, and compiling Request No. 2 is:

$$47.9 \text{ hours} \times \$15.00 = \quad \quad \quad \mathbf{\$718.50}$$

In summary, the total cost estimate associated with your access to public records act requests is as follows:

Request No. 1:

Part 1, emails	\$379.50
Part 2, curriculum	\$116,032.50

Request No. 2: emails \$718.50

TOTAL: \$117,130.50

This estimate is for electronic copies of the requested documents. Consistent with R.I.G.L. § 38-2-4(a), the cost per copied page of written documents copyable on common business or legal size paper is fifteen (\$.15) cents. As such, the estimate for hard copies of the foregoing documents is as follows:

Request No. 1:

$$789 \text{ emails} \times ($.15) = \quad \quad \quad \$118.35$$

$$42,390 \text{ documents} \times ($.15) = \$6,358.50$$

Request No. 2:

$$1,438 \text{ emails} \times ($.15) = \quad \quad \quad \$215.70$$

TOTAL: \$6,692.55



HENNEOUS CARROLL LOMBARDO LLC

Should you wish to pay the amount of \$117,130.50 to receive electronic copies of the responsive documents, or \$123,823.05 to receive hard copies of the responsive documents, kindly let me know and I will provide you with the documents once payment has been remitted. The School District recognizes that the time and effort required to produce the requested documents is costly, and therefore, if you would like to revise your request or requests to narrow them in time or scope, please let the public records officer know and the District will work with you to provide an amended estimate.

In accordance with R.I. Gen. Laws § 38-2-8, if you disagree with this determination, you may file a complaint with the Department of the Attorney General located at 150 South Main Street, Providence, Rhode Island, 02903, or with the Rhode Island Superior Court of the county where the record(s) are maintained. Additional information related to the Access to Public Records Act may be found online, through the Attorney General's website at www.riag.ri.gov.

Thank you for your interest in keeping government open and accountable to the public.

Sincerely,

Deidre E. Carreno

cc: Christopher Ashley, Acting Superintendent