

PUBLIC RECORDS REQUESTS

The following is a request to produce public records. The word communications shall be understood to include, but not limited to, emails, text messages, Facebook, twitter, notes and memoranda. Emails shall be understood to include emails to and from Mason Classical Academy (“MCA”) email addresses, personal emails in which any MCA matters are mentioned and/or discussed or those of Collier County School District. Please produce all requests, including attachments, electronically. Any cost estimate should be presented and itemized for each request, individually.

1. All communications between Kelly Lichter and any partner, associate, or employee of the Coleman, Hazzard, Taylor, Klaus, Doupé, and Diaz Law Firm (hereinafter the “Coleman Firm”) from June 10, 2019, to November 15, 2019.
2. All communications between, whether to or from, David Bolduc and the Coleman Firm from June 10, 2019, to November 15, 2019.
3. All communications between, whether to or from, Laura Miller and the Coleman Firm from June 10, 2019, to November 15, 2019.
4. All communications between, whether to or from, Conrad Willkomm and the Coleman Firm from August 10, 2019, to November 15, 2019.
5. All communications between, whether to or from, the Coleman Firm and Kelly Lichter, David Bolduc, Laura Miller, and Conrad Willkomm concerning the preparation, issuance, and revision of the Firm’s Report responding to the Investigative Report of Jon Fishbane between August 15, 2019, to November 15, 2019.
6. All communications between, whether to or from, Kelly Lichter, David Bolduc, Laura Miller, and Conrad Willkomm and the Coleman Firm concerning factual errors found in the Coleman Report between September 1, 2019, to November 15, 2019.
7. All communications between the Coleman Firm and any MCA Board Member concerning what facts in the Coleman Report were in need of correction between September 1, 2019, to November 15, 2019.
8. All communications between, whether to or from, Kelly Lichter, David Bolduc, Laura Miller, Conrad Willkomm, and Ms. Foster concerning any aspect of the Coleman Report from September 1, 2019, to November 15, 2019.
9. Each and every version of the Coleman report sent to MCA Board Members by the Coleman Firm, or from any source, and any and all emails accompanying each version sent from September 1, 2019, to November 15, 2019.

10. All communications between, whether to or from, Jana Greer and Kelly Lichter concerning the Investigative Report of Jon Fishbane between June 10, 2019, to November 15, 2019.
11. All communications between, whether to or from, Jana Greer and Kelly Lichter concerning the Coleman Report between September 1, 2019, to November 15, 2019.
12. All communications between, whether to or from, Jana Greer and Kelly Lichter concerning any matter involving or pertaining to MCA and/or the Collier County School District from June 10, 2019, to November 15, 2019.
13. All communications between, whether to or from, Jana Greer, Laura Miller, and David Bolduc concerning the Coleman Report and/or the Investigative Report of Jon Fishbane from June 10, 2019, to November 15, 2019.
14. All communications between, whether to or from, Jana Greer, David Hull, and/or Joe Whitehead concerning any matter involving or pertaining to MCA and or the Collier County School Board, including but not limited to the Investigative Report of Jon Fishbane and/or the Coleman Report from June 10, 2019, to November 15, 2019.
15. All communications between, whether to or from, Jana Grier and the Coleman Firm concerning any matter involving or pertaining to MCA and/or the Collier County School District between July 5, 2019, to November 15, 2019.
16. All communications between, whether to or from, David Hull and Joe Whitehead concerning any matter involving or pertaining to MCA and the Collier County School District, including but not limited to, the Investigative Report of Jon Fishbane and the Coleman Report, from June 5, 2019, to November 15, 2019.
17. All communications between, whether to or from, David Hull and the Coleman Firm from June 5, 2019, to November 15, 2019.
18. All communications between, whether to or from, Joe Whitehead and the Coleman Firm from June 5, 2019, to November 15, 2019.
19. All communications between, whether to or from, Jana Greer and any MCA employee and/or administrator from June 10, 2019, to November 15, 2019.
20. All communications between, whether to or from, Jana Grier and any MCA Governing Board Member, David Hull, and/or Joe Whitehead in which the names of Erika Donalds, Byron Donalds, Matt Mathias, Naples Classical Academy (“NCA”), and Optima are in any way mentioned or referred to between June 5, 2019, to November 15, 2019.
21. All communications between, whether to or from, David Hull, and any employee of Hillsdale College from July 1, 2017, to August 10, 2019.

22. All communications between, whether to or from, Joe Whitehead and any employee of Hillsdale College between July 1, 2017, to August 10, 2019.

23. All communications between, whether to or from, Kelly Lichter and any person, including but not limited to, any MCA parent, supporter, employee or attorney and/or employee at the Coleman Firm or the Shawn Arnold Firm concerning any matter involving or pertaining to the Mediation Settlement Agreement between MCA and the District School Board of Collier County and in which communications the terms mediation, settlement, committee, board, governing board, and principal are mentioned or noted from August 2, 2019, to November 15, 2019.

24. All communications between, whether to or from, Laura Miller and any person, including but not limited to, any MCA parent, supporter of MCA, MCA employee or MCA attorney, whether partner, associate, and/or employee at the Coleman Firm and/or the Shawn Arnold Firm concerning any matter involving or pertaining to the Mediation Settlement Agreement between MCA and the District School Board of Collier County, and in which communications the terms mediation, settlement, committee, board, governing board, and principal are mentioned or noted from August 2, 2019, to November 15, 2019.

25. All communications between, whether to or from, David Bolduc and any person, including but not limited to, any MCA parent, supporter of MCA, MCA employee or MCA attorney, whether partner, associate, and/or employee at the Coleman Firm and/or the Shawn Arnold Firm concerning any matter involving or pertaining to the Mediation Settlement Agreement between MCA and the District School Board of Collier County, and in which communications the terms mediation, settlement, committee, board, governing board, and principal are mentioned or noted from August 2, 2019, to November 15, 2019.