



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

July 10, 2024

LaTonya Williams
Board President
St. Joseph School District Board of Education
1415 N. 26th Street
St. Joseph, MO 64506
Sent via email to: latonyawilliams@sjsd.k12.mo.us

Re: Sunshine Law Review – St. Joseph School Board of Education

Dear Ms. Williams,

My office has received credible and concerning allegations that the St. Joseph School District Board of Education has violated the Sunshine Law as well as state ballot-measure expenditure and state conflict of interest laws. By this writing, I am putting you on notice that the Attorney General's Office is reviewing this matter and I demand that the Board immediately comply with this request for records pursuant to the Sunshine Law. The law requires public transparency about Board expenditures of public funds towards ballot measures and potentially prohibited transactions between the Board and non-profit organizations led by Board members. You have three business days to comply with the demands specified below or face further action by this office.

On behalf of the Attorney General's Office, you must immediately provide the following public records and/or information to our office:

1. Notices, tentative agendas, and minutes for all open and closed public meetings of the Board of Education from January 1 to July 1, 2024;
2. A list of all date(s) when a quorum of the St. Joseph School Board was present together before, after, or outside a posted public meeting from January 1 to July 1, 2024;

3. State whether the Board has recorded any closed-session meetings between January 1 to July 1, 2024, and, if so, the meetings dates for which such recordings exist;
4. All emails and attachments, texts, documents or any communications in written or audio format, that contain at least four members of the Board as recipients between January 1 to July 1, 2024, including email attachments;
5. All emails and attachments, texts, documents or any communications in written or audio format, sent or received by any Board member that contains the word “bond,” “ballot,” or “campaign” between January 1 to April 1, 2024, including email attachments;
6. A copy of every check, receipt, or record of transactions documenting the expenditure of any Board of District funds relating to a bond measure that was on the April 2024 ballot;
7. A copy of each flyer, sign, advertisement, newsletter, or notice sent or prepared by Board or District staff pertaining to the bond measure that was on the April 2024 ballot;
8. All emails and attachments, texts, documents or any communications in written or audio format, containing the phrase “115.646” between January 1, 2022 and July 1, 2024;
9. All public records (including but not limited to emails and attachments, texts, documents or any communications in written or audio format) relating to the request for qualifications of, selection process or criteria for, bidding process for, and discussion of a construction management at-risk method between March 1, 2024 and July 1, 2024;
10. All emails and attachments, texts, documents or any communications in written or audio format, containing the terms “CMR” and “CMAR” between January 1 and July 1, 2024;
11. All emails and attachments, texts, documents or any communications in written or audio format, containing the terms “CAPSTJOE” and “Community Action Partnership” between January 1, 2022, and July 1, 2024;
12. All contracts, agreements, and memoranda of understanding between the St. Joseph School District or Board and Community Action Partnership of Greater St. Joseph between January 1, 2022, and July 1, 2024;

13. All Board meeting notices, agendas, and minutes pertaining to contracts, agreements, and memoranda of understanding between the St. Joseph School District or Board and Community Action Partnership of Greater St. Joseph between January 1, 2022 and July 1, 2024;
14. Any financial records reflecting the cost or value of any money received, money given to, in-kind contribution received from, or in-kind contribution given to the Community Action Partnership of Greater St. Joseph, between January 1, 2022, and July 1, 2024; and
15. All of the District's and Board's policies pertaining to conflicts of interest, concurrent employment, or membership in outside organizations for Board members and District employees.

I request that all public records be provided electronically to Diana.Haines@ago.mo.gov, whether as email attachments or a file-upload link depending on the size of your production. My office will provide a link for you to upload records if the Board does not have the ability to create one. If any responsive public records exist only in physical or hard-copy form, promptly inform our office.

Further, I request that responsive public records to each of the requests above be separated into separate batches or sub-folders for each request, not combined or merged with other requests. If any public record is responsive to more than one of the above requests, I request that you still include it as responsive in your batch of production to each of the requests to which the record is responsive.

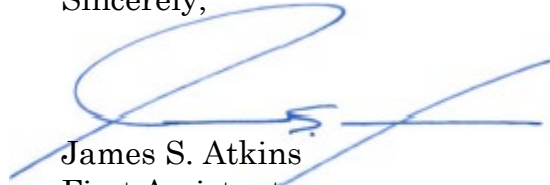
This request qualifies for a fee waiver because I am submitting it on behalf of a government agency, and all records requested are in the public interest so that the Attorney General's Office and the public can better understand the operations of the Board and the District. There is no commercial or profit motive for this request. Therefore, I request that all fees be waived.

Finally, in the event that this letter has reached someone who is not the custodian of records for the Board, you must immediately forward this request to the Board's custodian of records.

The allegations brought to my office are very concerning and this office takes them very seriously. Public officials have a duty to maintain the highest standards of conduct. This is especially true when public officials are responsible for the education of children. As such, it is critical that you comply immediately with the demands contained herein and promptly provide these records. Sunshine is said to be the best disinfectant and full transparency is certainly the best way to restore the trust of the public.

After receiving your response, my office may contact you if we have additional questions. If you have questions about compliance with this request, I may be reached at (573)751-8807.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James S. Atkins', with a large, sweeping flourish extending to the right.

James S. Atkins
First Assistant
Missouri Attorney General's Office