

IN THE CIRCUIT COURT OF SEBASTIAN COUNTY, ARKANSAS
FORT SMITH DIVISION
CIVIL DIVISION

CURTIS E. SORRELLS

v.

NO. CV-15-607

FILED
FT. SMITH DIST.
Russell Moore
2015 JUL 29 10:54
PLAINTIFF 54
CIR. CLERK SEB. CO.

DEANIE MEHL, SUSAN MCFERRAN, JEANNIE COLE,
YVONNE KEATON-MARTIN, WYMAN WADE JR., and
DAVID HUNTON in their official capacity as members of the
Fort Smith Public Schools Board of Education and not in their
individual capacity; FORT SMITH SCHOOL DISTRICT;
FORT SMITH PUBLIC SCHOOLS BOARD OF EDUCATION

DEFENDANTS

SECOND AMENDED AFOIA COMPLAINT AND REQUEST FOR HEARING

Comes now the Plaintiff, Curtis E. Sorrells, and for his cause of action and second amended complaint against the Defendants, Fort Smith School District and Fort Smith Public Schools Board of Education and the other named defendants who are all named only in their official capacity, states:

1. This is an appeal from a denial of rights under the Arkansas Freedom of Information Act ("AFOIA") pursuant to Arkansas Code Annotated § 25-19-107(a).

Parties, Jurisdiction, and Venue

2. Plaintiff Curtis Sorrells is an adult citizen of the State of Arkansas, whose address is 313 Rivercrest Drive, Fort Smith, Arkansas, 72903; he brings this action as a matter of right under Arkansas Code Annotated § 25-19-107. Plaintiff is a taxpayer who resides in the Fort Smith District of Sebastian County, Arkansas and who pays taxes that support the Fort Smith Public School District.

3. Defendants Deanie Mehl (At Large), Susan McFerran (Zone II), Jeannie Cole (Zone III), Yvonne Keaton-Martin (Zone IV), Wyman Wade Jr. (At Large), and David Hunton

(At Large) in their official capacity as members of the Fort Smith Public Schools Board of Education members and not in their individual capacity, are duly elected members of the Fort Smith Public Schools Board of Education. The School Board members are tasked with complying with the open-meetings provisions of the Arkansas Freedom of Information Act, codified at Ark. Code Ann. § 25-19-106.

4. Defendant Fort Smith School District is a political corporation organized under the laws of the State of Arkansas.

5. Defendant Fort Smith Public Schools Board of Education is the governing body of the Fort Smith School District.

6. Dr. David Hunton, Susan McFerran, Yvonne Keaton-Martin, Jeannie Cole, Wyman Wade Jr., Dr. Deanie Mehl, and Rusty Owen are duly elected members of the Fort Smith Public Schools Board of Education. The Fort Smith Public Schools Board of Education is tasked with complying with the open-meetings provisions of the Arkansas Freedom of Information Act (“AFOIA”), codified at Ark Code Ann. § 25-19-106.

7. This Court has subject-matter jurisdiction pursuant to Ark. Code Ann. Section 25-19-107(a).

8. Venue lies in the Fort Smith District of Sebastian County, Arkansas, under Ark. Code Ann. § 25-19-107(a).

Factual Background

9. On Monday, June 22, 2015, members of the Fort Smith Public Schools Board of Education met at 5:30 p.m. in the Service Center Building for its regularly scheduled meeting. Notice of the regularly scheduled meeting was given. See Exhibit A attached to the original Complaint.

10. Southside High School is a high school in Fort Smith, Sebastian County, Arkansas. High Schools in Arkansas typically have a school mascot and school fight song. Southside High School first opened in the 1960s. Since its inception, it has used the song "Dixie" as its fight song and the "Rebel" as its mascot. Based on information and belief, on Monday, June 22, 2015, shortly before the regularly scheduled Board meeting, the members of the Fort Smith Public Schools Board of Education met informally and discussed and deliberated on the subject of prohibiting the use of the song Dixie as the Southside High School fight song and changing the Southside High School mascot from the Rebel. A secret informal caucus can result in a consensus being reached on a given issue, thus rendering the formal meeting held before the public a mere charade. *See, e.g., Harris v. City of Ft. Smith, 359 Ark. 355, 197 S.W.3d 461 (2004).*

11. At the Monday, June 22, 2015, Fort Smith Public Schools Board of Education meeting, the School Board members voted to spend 70 million dollars to expand and renovate five local schools, including Southside High School and ask voters to improve a millage increase in September 2016.

12. On June 22, 2015, a notice was sent out to various news media, notifying said news media, and which stated that: "The Fort Smith Board of Education will meet on Tuesday, June 23, 2015 at 5:30 p.m. in the Service Center, Building B, with the purpose of the meeting being the annual evaluation of the superintendent." See Exhibit B attached to the original Complaint.

13. A second media alert was sent to the news media on June 23, 2015 at 3:22 p.m. notifying the media that, "Members of the Fort Smith Public Schools Board of Education will meet today for the annual evaluation of Superintendent Benny Gooden. A fax regarding this

closed meeting was sent yesterday.” See Exhibit C attached to the original Complaint. The purpose of the notice was to lead members of the public and media into believing that the meeting was solely to discuss a personnel issue and that the meeting would not be open to the public, or at least for the most part not open to the public, because it concerned a personnel issue.

14. Despite the notice which was designed to tell the public and media to not attend the meeting, on June 23, 2015, five members of the Fort Smith Public Schools Board of Education held a special and/or emergency meeting for the purpose of prohibiting the use of the song Dixie as the Southside High School fight song and to change the Southside mascot from the Rebel. Despite the fact that this was the purpose of the Fort Smith Public Schools Board of Education, no notice of the purpose was ever provided to the media, to taxpayers, or to any person other than the members of the Fort Smith Public Schools Board of Education who had secretive knowledge that such issue was going to be addressed and voted upon. A “tip” was sent to KFSM 5 News by an anonymous person(s) that members of the Fort Smith Public Schools Board of Education may be meeting to change the Southside High School fight song and mascot.

15. After convening, five members of the Fort Smith Public Schools Board of Education, including Deanie Mehl, Susan McFerran, Jeannie Cole, Yvonne Keaton-Martin, and Wyman Wade Jr., passed a motion to stop using Dixie as the Southside High School fight song in the 2015-2016 school year and to change the Southside mascot from the Rebel in the 2016-2017 school year. Shortly after the meeting, School Board member Susan McFerran told KFSM 5 News, “It’s official.”

16. A video footage posted by KFSM 5 News on the night of the vote, June 23, 2015, clearly shows only five members of the Fort Smith Public Schools Board of Education casting their vote. Further, KFSM News reporter, Aubry Kilion, who was in the room at the time of the

vote because of an anonymous tip, reported in a 5 News story immediately after the vote that the Fort Smith School Board passed a motion to ban the song “Dixie” and rebel mascot by a vote of five to zero. See Exhibit E attached to the First Amended Complaint. See Exhibit F attached to the First Amended Complaint..

17. On June 23, 2015, at approximately 7:42 pm, Zena Featherston, Director of Communication with the Fort Smith Public Schools District, sent an email stating: “The Fort Smith Public School Board convened as a Committee of the Whole tonight and passed a motion with a 6-0 vote to stop using “Dixie” as the Southside High School fight song in the 2015-2016 school year and to change the Southside mascot from the Rebel in the 2016-2017 school year. See Exhibit G attached to the First Amended Complaint.

18. On July 23, 2015, at approximately 10:52 am, Plaintiff Curtis E. Sorrells filed an AFOIA Complaint and Request For Hearing. See Exhibit H attached to the First Amended Complaint.

19. On information and belief, Fort Smith Public School Board of Education member David Hunton was not present when the Fort Smith Public School Board of Education discussed the motion concerning “Dixie” and rebel mascot and was not present when the vote was taken on the issue. See Exhibit E and F.

20. On July 23, 2015, Fort Smith School District spokesperson, Zena Featherston, was interviewed by Dave Hughes of the Arkansas Democrat-Gazette and said, “David Hunton arrived at the meeting later and also cast a vote to make the change.” See Exhibit I attached to the First Amended Complaint.

21. After the original AFOIA Complaint and Request For Hearing was filed, Plaintiff learned, on information and belief, that Fort Smith Public School Board of Education member

David Hunton voted after the meeting of June 23, 2015 in favor of the motion to change "Dixie" and the Rebel mascot. A press release was made by Zena Featherston, acting on behalf of the Fort Smith Public School District that Defendant Hunton had voted in favor of the change.

22. If Defendant Hunton voted in favor of the motion to change "Dixie" and the Rebel mascot after the original vote, such actions would be void and invalid and in violation of the open meetings provisions of the Arkansas Freedom of Information Act.

23. Furthermore, on information and belief, the minutes of such meeting reflect that Defendant Hunton voted in favor of such change at the time that such vote was taken. If the minutes, do contain such a report to this effect, then they are fraudulent and inconsistent with the Arkansas Freedom of Information Act and other provisions of Arkansas law mandating truthful reporting of open public school board meetings.

24. The minutes of the June 23, 2015 meeting were requested and have not been provided.

25. Although the Fort Smith Public Schools Board of Education and the leadership has not stated the cost to change the Southside mascot from the Rebel in 2016-2017, principal Wayne Haver, who was not made aware of the fight song and mascot change before the vote was taken, estimated that the change of mascot will cost taxpayers between \$200,000 to \$500,000. Further, the Board of Education has not informed the public as to where the money will come from, but it is presumed that the change of the Southside mascot in the school year 2016-2017 will be paid for by the millage increase, if it is passed by the voters in September 2016.

26. The Fort Smith Public Schools Board of Education's meetings on June 22, 2015 and June 23, 2015 were special meetings because Fort Smith Public Schools were not in session during the month of June 2015. See Ark. Code Ann. § 6-13-619. Furthermore, the cited statute

does not permit two regular meetings on two consecutive days. Therefore, the meeting of June 23, 2015 was unequivocally a special meeting.

27. The Fort Smith School District has policies and procedures on Special Board Meetings which states: "Special meetings of the Board of Education shall be called by the President or any three members of the Board or when petitioned to do so by a petition in writing signed by fifty electors in the District No business shall be transacted at any special meeting of the Board which does not come within the purpose(s) set forth in the call for the meeting, unless all members of the Board are present and by majority vote agree to consideration of the additional items. *Each member of the general public shall be notified of the time, place and purpose of the special meeting in accordance with the established procedure.*" [emphasis added] See Exhibit D attached to the original Complaint.

CLAIM: Violation of the Open-Meetings Provisions of the AFOIA

28. Plaintiff restates the facts and allegations in paragraphs 1 through 27, *supra*, as if laid out in full herein.

29. The Arkansas Freedom of Information Act (herein "AFOIA") states: "It is vital in a democratic society that the public business be performed in an open and public manner so that the electors shall be advised of the performance of public officials and of the decisions that are reached in public activity and in making public policy. Toward the end, this [act] is adopted, making it possible for them, or their representatives to learn and report fully the activities of their public officials." As Founding Father James Madison said, "A Popular Government, without popular information, or the means of acquiring it is but a Prologue to a Farce or a tragedy, or perhaps both." Louis Brandeis and Woodrow Wilson stated, "Publicity is justly commended as a remedy for social and industrial diseases," Brandeis once wrote, and "[s]unlight is said to be the

best of disinfectants...” Similarly, Wilson remarked that “[l]ight is the only thing that can sweeten our political atmosphere [and] open to view the innermost chambers of government.”

30. Under AFOIA, “except as otherwise specifically provided by law, all meetings, formal or informal, special or regular, of the governing bodies of all municipalities, counties, townships, and school districts and all boards, bureaus, commissions, or organization of the State of Arkansas, except grand juries, supported wholly or in part by public funds or expending public funds, shall be public meetings.” Ark. Code Ann. § 25-19-106(a).

31. AFOIA requires that a governing body give notice of special or emergency meetings at least two hours in advance to media organizations that have requested notice. Ark. Code Ann. § 25-19-106(b)(2).

32. The special meeting held on June 23, 2015 violated AFOIA and the policies and procedure of the Fort Smith School District in that: (a) business at the special meeting was transacted that did not come within the purpose set forth in the call for meeting, said call attached hereto as Exhibit B and C; (b) no notice of the special meeting to discuss the Southside High School fight song and mascot was given by the Fort Smith School District to media organizations; and (c) the public was led to believe that the meeting of June 23, 2015 was a closed meeting to only evaluate the superintendent.

33. The informal meeting held before the regularly scheduled meeting on June 22, 2015 violated the AFOIA in that: (a) a governing body must hold a public meeting even if its purpose is to discuss proposals or gather information; (b) the Freedom of Information Act entitles the public to learn not only of actions taken on particular matters, but the reasons for the actions and the Freedom of Information Act reaches every step of the decision-making process, not simply the point at which the decision is announced. *See* John J. Watkins & Richard J. Peltz,

“The Arkansas Freedom of Information Act” (5th ed.), at 297 (citing *Arkansas Gazette Co. v. Pickens*, 258 Ark. 69, 522 S.W.2d 350 (1975)).

34. In the event that there is no dispute about the fact that the Fort Smith Public Schools Board of Education is a proper party and has the capacity to be sued in this cause of action, Plaintiff will dismiss the Fort Smith School Board members who have been sued in their official capacity and not their individual capacity.

SECOND CLAIM: Violation of Open Records Provision of the AFOIA

35. Plaintiff restates the facts and allegations in paragraphs 1 through 34, supra, as if laid out in full herein.

36. On July 2, 2015 Plaintiff requested copies of the official minutes from the June 23, 2015 Board of Education meeting. A copy of the request is attached hereto as Exhibit J and incorporated herein.


37. Plaintiff received working copies on July 24, 2015 at 5:43 pm. Working copies or preliminary draft minutes are not official minutes. A copy of the preliminary draft minutes from the June 23, 2015 Board of Education meeting are attached hereto as Exhibit K and incorporated herein.

38. As of July 29, 2015 at 12:23 pm, Plaintiff has still not received the official minutes from the June 23, 2015 Board of Education special meeting. As recently as Tuesday, July 28, 2015, Plaintiff has requested the official minutes from the June 23, 2015 Board of Education meeting and still not received anything. A copy of the email requesting the official minutes is attached hereto as Exhibit L and incorporated herein.

Prayer for Relief

WHEREFORE, based on the foregoing, Plaintiff prays that this Court take jurisdiction of this cause and to set a hearing on this matter pursuant to Ark. Code Ann. § 25-19-107(b); invalidate, pursuant to Ark. Code. Ann. § 25-19-107(c), the action taken at the meeting of June 23, 2015; order, pursuant to Ark. Code. Ann. § 25-19-107(c), that future meetings of the Fort Smith Public Schools Board of Education be held in compliance with the Freedom of Information Act and Fort Smith School District policies and procedures; award Plaintiff's reasonable attorney's fees and litigation expenses pursuant to Ark. Code Ann. § 25-19-17(d); the Court issue an injunction compelling that the minutes of the June 23, 2015 Fort Smith Public School Board of Education be changed to accurately reflect what transpired at the meeting; that the court issue an injunction preventing the Fort Smith Public School Board of Education from taking, soliciting, or accepting a vote on any issue in the future by a School Board member who is not present when the actual vote is taken; to order Defendants, pursuant to Ark. Code Ann. § 25-19-107(c), to make available all records requested by Plaintiff in his request of July 2, 2015, including but not limited to the official minutes from the June 23, 2015 Board of Education special meeting; and grant all other relief to which Plaintiff may be entitled.

Respectfully submitted,


Joey McCutchen (No. 88-045)
McCutchen Buckley - The Law Firm
P.O. Box 1971
Fort Smith, AR 72902-1971
Phone 479-783-0036
Facsimile 479-783-5168

Service of any documents by e-mail will not be received by counsel for the Plaintiff unless copied to pam@mccutchenlawfirm.com

CERTIFICATE OF SERVICE

I, Joey McCutchen, hereby certify that a copy of the above and foregoing pleading was emailed and mailed to all attorneys of record as listed below on July 29, 2015:

Mr. James Mitch Llewellyn
Thompson & Llewellyn
412 South 18th Street
Fort Smith, AR 72902-0818



Joey McCutchen



July 2, 2015

Dr. Benny Gooden
Fort Smith Public Schools
3205 Jenny Lind Road
Fort Smith, AR 72901

Re: Request for Public Records under the Arkansas Freedom of Information Act
regarding the removal of "Dixie" and Southside High School mascot

Dear Dr. Gooden:

By this letter, I hereby request access under the Arkansas Freedom of Information Act, Ark. Code Ann. §§ 25-19-101 *et seq.*, to the public records described below.

This request is to receive copies of the following records:

1. Minutes from the Regular School Board Meeting June 22, 2015.
2. Agenda for the June 22, 2015 Regular School Board meeting.
3. Any and all notices sent out regarding the Regular School Board Meeting on June 22, 2015.
4. Any and all notices sent out of any meeting of the Fort Smith School Board that occurred on June 22, 2015 before the Regular School board meeting.
5. Any and all minutes of any meeting that occurred on June 22, 2015 of the Fort Smith School Board before the Regular School Board meeting.
6. Any and all notices that were sent out to the public regarding the evaluation of Dr. Benny Gooden, which occurred on June 23, 2015.
7. Any and all notices that were sent out to the public regarding a Committee of the Whole of the Fort Smith School Board on June 23, 2015 to discuss the song "Dixie" as the Southside High School fight song and to discuss the Southside High School mascot.



8. Any and all minutes from the June 23, 2015 meeting in which the Fort Smith School Board convened as a Committee of the Whole and passed a motion to stop using "Dixie" as the Southside High School fight song in the 2015-2016 school year and to change the Southside mascot from the Rebel in the 2016-2017 school year.

9. Any and all emails, documents, letters, or other correspondence between Fort Smith School Board members and Staff of the Fort Smith Public Schools, which mentions or otherwise discusses the song "Dixie" as the Southside High School fight song and/or the Southside High School mascot.

10. Any and all notices sent out to the public regarding the Committee as a Whole meeting that was held on June 15, 2015.

11. Minutes of the Committee as a Whole on June 15, 2015.

I ask that you make these records available for inspection and provide copies of the records within three working days of this request, as the Freedom of Information Act requires.

In the event that any of the requested records contain information exempt from disclosure, the records must be released with the exempt portions deleted. If my request is denied in whole or in part, I ask that you explain the basis for your action and specify the statutory exemption that provides for nondisclosure of the records or deletion of portions thereof.

Should you have any questions with regard to this request, please contact me by cell at 479-806-4878 or by email at jmccutchen@mccutchenlawfirm.com. Thank you for your assistance in this matter.

Kindest Regards,

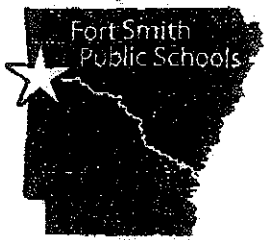


Joey McCutchen

cc: Zena Featherston Marshall
Dr. Gordon Floyd

783-5168

Today... and ...



in the Future

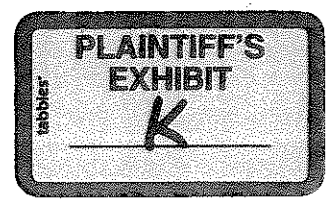
Office of the Superintendent

3205 Jenny Lind • P.O. Box 1948
Fort Smith, Arkansas 72902-1948
479-785-2501
Fax: 479-785-1722

PRELIMINARY DRAFT

DATE _____
FOR DISCUSSION PURPOSES ONLY

D R A F T



TO: Board of Education
FROM: Benny L. Gooden, Superintendent of Schools
DATE: June 25, 2015
SUBJECT: Committee of the Whole Minutes/Called School Board Minutes

Ms. Susan McFerran made a motion, seconded by Ms. Yvonne Keaton-Martin, to convene as a Committee of the Whole at 5:45 p.m. on Tuesday, June 23. The vote for approval was 5/0. Board members present were Ms. Jeannie Cole, Mr. Wyman R. Wade, Jr., Esq., Dr. Deanie Mehl, Ms. Yvonne Keaton-Martin, and Ms. Susan McFerran. Dr. David Hunton arrived at 6:20 p.m. Mr. Russell Owen was absent. Superintendent Benny L. Gooden was also present.

PRELIMINARY DRAFT

Giving great consideration to the impact of perceived symbols of racism on the community, state and nation, the Fort Smith Public School Board committee members discussed changing the Southside High School mascot and discontinuing the "Dixie" fight song. Symbols associated with Southside High School have been a topic of discussion with the FSPS Board of Education since a resolution to study the use of these symbols passed in 1989.

DATE _____
FOR DISCUSSION PURPOSES ONLY

Ms. Susan McFerran made a motion, seconded by Ms. Yvonne Keaton-Martin, to discontinue the use of "Dixie" as the Southside High School fight song immediately and to phase out the Rebel as the Southside mascot over the next year completing the process in 2016/2017. The motion passed with a 5/0 vote, with Dr. David Hunton expressing an affirmative vote upon his arrival. This recommendation will be placed on the Board of Education agenda for consideration on July 27, 2015.

PRELIMINARY DRAFT

DATE _____
FOR DISCUSSION PURPOSES ONLY

The Committee of the Whole adjourned at 6:35 p.m.

A called school board meeting for the purpose of evaluating the superintendent was convened at 6:35 p.m.

Board members met with Superintendent of Schools Dr. Benny L. Gooden to complete his annual evaluation.

Directors went into closed session to discuss the Superintendent's performance at 7:45 p.m. Board members opened the session at 8:20 p.m. Ms. Jeannie Cole made a motion, seconded by

Committee Minutes/Called School Board Meeting
June 23, 2015
Page 2

Ms. Yvonne Keaton-Martin, to extend Dr. Gooden's contract for one year providing for the renewal of a three year agreement between the Board of Education and the Superintendent. The term of the 2015/2016 contract extended to June 30, 2018 and the current salary remains the same. The vote for approval was 6/0.

The meeting adjourned at ~~DATE~~ 8:25 p.m.

PRELIMINARY DRAFT
FOR DISCUSSION PURPOSES ONLY

Deanie Mehl, President

Wyman R. Wade, Jr., Esq., Secretary



Joey McCutchen <jmccutchen@mccutchenlawfirm.com>

Request For Public Records under the Arkansas Freedom of information Act (AFOIA) re costs to change the SHS fight song and mascot

1 message

Joey McCutchen <jmccutchen@mccutchenlawfirm.com>
To: bgooden@fortsmithschools.org
Cc: zfeather@fortsmithschools.org, gfloyd@fortsmithschools.org

Tue, Jul 28, 2015 at 7:38 AM



Dear Dr. Gooden, Ms Featherston or Dr. Floyd:

By this email, I hereby request access under the Arkansas Freedom of Information Act, Ark. Code Ann. Section 25-19-101 et seq. to the public records described below. I ask you to make copies of the records within three working days of the request, as the FOIA requires.

This request is to receive copies of the following records:

1. Any and all copyright requests or related items for adopting a new fight song or school mascot and any and all arrangement fees any other documents relating to the fight song at Southside High School. This request includes all costs related to such items;
2. Any and all bills, payments, invoices and summations or any other documentation for uniforms at Southside High School paid for by any part taxpayers dollars in the 2013/2014, 2014/2015 and 2015/2016. This includes, but is not limited to, uniforms for cheerleaders, Dixie Belles, band, all athletic teams and all extracurricular activities at Southside High School; This request relates to such uniforms which will have to changed as a result of the School Board votes re the changing the mascot and fight song.
3. The cost in the past and the current and/or future estimated cost and any and all supporting documentation relating to the football field at Southside High School, including but not limited to the end zone, mid-field turf, the tunnel entrance to the football field and any other costs related to the football field at Southside High School. This requests including any and all summaries prepared by the Fort Smith Public School District since the 2013/2014 school year to present. The request includes such costs for concession stands, press boxes, ticket booths and associated structures;
4. The cost in the past and the current and/or future estimated cost and any all supporting documentation relating changing the field house floor, other gyms at Southside High School, practice facilities, weight rooms and other facilities;
5. The cost in past and the current and/or future estimated cost of parking passes distributed to teachers, staff members and students;
6. All correspondence sent to teachers, staff members and any other person or organization relating to the change of school mascot, relating to cost of replacing such items and related issues and the replies of said individuals or organizations;
7. Any compilation of information related to costs of changing the Southside mascot;
8. Any correspondence with private donors, Fort Smith Board of Directors or other community members related to the change of the mascot and/or cost of the change;

9. Any correspondence whatsoever, including but not limited to emails, letters, texts or social media to any person or entity relating the process which will be followed when implementing changes relating to the Mascot and fight song at Southside High School;

10. Any costs and or estimated costs or compilations and supporting documentation provided by Southside High School Principal Wayne Haver on or after June 23, 2015 relating to changing the Southside High School mascot or fight song ;

11. Any cost in past and the current and/or future estimate costs and all supporting documentation to replace banners at Southside High School relating to the change of the mascot and fight song;

12. Any and all documentation relating to changing the Southside Mascot or fight song whether sent or received by the Fort Smith School District;

13. Any and all documentation whatsoever of where the money will come from related to the change of the Southside High School Mascot and fight song.

If the request is denied in whole or in part, I ask that you please explain the basis for your action and specify the statutory exemption that provides for the nondisclosure of the records or deletion of portions thereof.

Also, please update the response to my FOIA request which you initially responded to on July 7, 2015, including but not limited to the final minutes of the June 23, 2015 school board meeting.

Should you have any questions with regard to this request, please contact me. Thank you for your assistance in this matter.

Joey McCutchen

Trial Lawyer

"Protect the 7th Amendment; it's the one that protects all the rest."

McCutchen Buckley – The Law Firm

P.O. Box 1971, 1622 North B Street

Fort Smith, AR 72902

Office: (479) 783-0036 Fax: (479) 783-5168

Toll Free: (800) 871-0036

<http://www.mccutchenbuckley.com/>

