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Attorneys for Petitioner and Plaintiff,
Center for American Liberty

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MONTEREY — MONTEREY COURTHOUSE

Center for American Liberty,
a Virginia Not for Profit corporation;

Petitioner and Plaintiff

vs.

Greenfield Union School District;
and DOES 1 through 100, inclusive

Respondents and Defendants.

Case No.: **25CV006602**

Judge: Julie R. Culver

Dept: 13A

UNLIMITED JURISDICTION

**Verified Amended Petition for Writ of
Mandate; Complaint for Declaratory &
Injunctive Relief**

[Gov. Code §§ 7921.000, et seq.]

Petitioner and Plaintiff Center for American Liberty, (“CAL”), alleges as follows¹:

1. In this action, CAL seeks to enforce its right to obtain public records pursuant to the California Public Records Act, Government Code² section 7920.000³ (“CPRA”) for several CPRA requests to Respondent.

FACTS

¹ On January 12, 2026 the Court approved Petitioner’s Amendment to Complaint authorizing the name change of Respondent from Greenfield Unified School District to its proper name Greenfield Union School District.

² All undesignated code references are to the Government Code.

³ The legislature re-codified the Public Records Act from Government Code section 6250, et seq. to section 7921.000, et seq effective on January 1, 2023.

2. This matter is regarding Public Records Act requests contained in a letter from Petitioner to Respondent Greenfield Union School District.

PUBLIC RECORDS REQUEST OF SEPTEMBER 11, 2025

3. On or about September 11, 2025 Petitioner issued a Public Records Act (“CPRA”) request to the Respondent Greenfield Union School District (“GUSD” or “Respondent” or “agency”). A copy of CAL’s September 11, 2025 Public Records Act request is attached hereto as Exhibit A. That request was for:

PUBLIC RECORDS ACT REQUEST I:

Pursuant to the California Public Records Act, Govt. Code §§ 7920.000 – 7930.215, Center for American Liberty (“Requestor”) respectfully requests to inspect all public records in the possession or control of the District (“District”) for the following:

1. I request to have sent to my office the policy(s) and procedures adopted by the District for compliance with the District’s obligations to maintain Pupil Records and disclose same to parents / guardians as defined under Education Code sections 49061 & 49069.7 and under the Family Educational Right and Privacy Act (FERPA), 20 U.S.C. section 1232g and 34 CFR Part 99. In addition, I request that the District disclose to my client any policy(s) and procedures regarding or describing or handling “informal notes related to an identifiable pupil complied by a school officer or employee.” Education code section 49061 (b). This specifically includes any document or documents that define what the District considers to be or defines “informal notes” as described in Education code section 49061 (b) and set forth the basis for releasing to or withholding from a parent or guardian any such “informal notes” about a student (also known as granting or denying “access” as defined by Education Code section 49061 (e)).
2. Also, my client requests to review / receive any policy(s) and procedures adopted by the District for compliance with Assembly Bill 1266, the School Success and Opportunity Act of 2013 and Education Code section 221.5.
3. My client requests to review / receive any policy(s) and procedures adopted by the District for compliance with Assembly Bill 329, the California Healthy Youth Act of 2015 (California Education Code sections 51930–51939).
4. Any policy and procedures, and related communications about, whether or not adopted by the District for creation of and implementation of Gender Support Plan(s) or any similar plans (such as Gender Transition Plan or Individual Transition Plan) for students transitioning genders or having gender questioning including but not limited to the use of pronouns for the affected student(s). *Even if your District does not utilize such a*

1 *form, we still request the District's communications and instructions, etc. on*
2 *implementing the purposes of gender transition by the District such as any Frequently*
3 *Asked Questions (FAQ) memos on this subject. Please also forward a copy of the*
4 *minutes of the Board of Trustees adopting the use of (or non-approval) of such a*
5 *transition form. If no such minutes on this topic exists I request the District to advise*
6 *that no records exist on this specific topic / vote.*

- 7
- 8 5. Also my client wishes for the District to disclose any records stating how many students
9 (the number of students not their names or identities) have entered into or are subject to
10 one of these Plans / Agreements for each academic year from August 1, 2019 to the
11 present date.

12 The timeframe for Requests 1, 2, 3, 4 and 5 is from January 1, 2019 to the present date.

- 13
- 14 6. Any and all documents, including any policies and procedures adopted by the District
15 and any communications, concerning the District's implementation of Assembly Bill
16 1955 of 2024 (entitled "Support Academic Futures and Educators for Today's Youth
17 Act") filed with the Secretary of State on July 15, 2024. Education code sections 220.1,
18 220.3 and 220.5.

19 The timeframe for request 6 above is from January 1, 2024 to the present date.

- 20
- 21 7. I request the District send my office all documents, handouts, PowerPoint / media
22 presentations, videos, etc. used by any guest speakers for any topics related to the
23 curriculum / teaching about the matters covered in items 1 through 6 above. This would
24 include any materials about any such guest speaker including, for example, his/her
25 Curriculum Vite, Resume, Biography, etc. and any invoice for services for that guest
26 speaker's presentation. Also, any communications between any employee and any guest
27 speaker, between employees about any such guest speaker and between any District
28 employees and/or any third parties about any such guest speaker. If any writing /
responsive records includes the name of any student, I ask that the District redact that
student's name and forward to me the document in redacted form. This request also
includes any responsive records kept in electronic form.
8. For any communications, contracts, memorandums of understanding, purchase orders,
invoices and evidences of payment, such as warrants, checks, ACH transactions, wire
transfers, etc., if any, between the District and the following organizations / entities /
persons: Lexia, the ACLU, Planned Parenthood (including any of its local affiliates), the
Trevor Project, Genders & Sexualities Alliance Network, LGBT National Hotline,
GLAD, Parker-Anderson Enrichment and GLSEN. Also for Health Connect, Gender
Spectrum, the Human Rights Campaign, Hazel Health, Care Solace, GSA Network, Trans
lifeline, TransYouth Family Allies, PFLAG Transgender Network, California Coalition
for Youth, California Valued Trust, Edventure More, Paper Wing Theater A.C.T., West
End, Elevo, EveryChild CA Asso. of Leaders, Soliant Health, LLC, Maxim Healthcare
Services Hold, Hijos Del Sol Arts Productions, Harmony At Home, School Solutions,

1 LLC, Valley Health Associates, Learner-Centered Collaborative, Engage Learning, Inc.,
2 and CASEL.

- 3 9. Any correspondence, minutes, presentations, PowerPoint presentations and/or videos,
4 including electronic communication and in paper format, regarding any curriculum
5 and/or supplemental curriculum and/or instructional materials and/or teacher training
6 materials (and the actual curriculum / instructional materials / teacher training) in any
7 way regarding the District's programs / curriculum and the supplemental curriculum
8 itself regarding Ruler and the Yale University Center for Emotional Intelligence,
9 Committee for Children, Second Step, Character Strong, Social Emotional Learning,
10 Ethnic Studies, Critical Race Theory, Curriculum Assoc., LLC, Ed Theory, LLC,
11 Lakeshore Learning Materials, ABA Network, Casa Pacifica, Diversity, Equity &
12 Inclusion ("DEI"), Intersectionality, Transgenderism, Sanford Harmony, structural
13 racism, and / or social justice and any Equity Committee.
14
15 10. Any invoices, purchase orders, checks, warrants or any other form of payment by District
16 to any persons or organizations for curriculum, teacher training, public relations, parent
17 interactions, etc. regarding the topics described paragraphs 9 & 10. For this item, I wish
18 to make clear that we request a copy of any contracts, P.O.s, MOUs, etc. for any vendor
19 the District has purchased curriculum materials, teacher training materials or ancillary
20 materials from (such as a video or PowerPoint to use with the curriculum materials in the
21 classroom and/or teacher training). This is most important for any instance where the
22 District makes any claims of exemption / privilege to deny CAL access to any responsive
23 documents.
24
25 11. For communications (electronic and in paper format) by and between employees and / or
26 trustees of the District internally and/or with any third parties regarding the
27 implementation of matters stated in requests numbers 1 through 10 above.

19 For these items above, I recommend to the District that it begin its search for these
20 communications by starting with the person(s) or Department(s) that were tasked with
21 answering questions from District staff and/or third parties about the implementation of
22 these policies and procedures.

22 For example, the person(s) answering questions of District staff about filling out, safe
23 keeping, responses for request to see records by parents / guardians regarding any Gender
24 Support Plan (such as making changes or not to the student's permanent pupil records,
25 etc.). Or questions regarding what is included in "Pupil records" a parent or guardian may
26 see under Education Code sections 49061 & 49069.7 and if that includes a filled-out
27 Gender Support Plan (if any) or not. Another example would be about the
28 implementation of new curriculum or instructional materials pursuant to any of the
statutes listed above. It is hoped that this suggestion will assist the District in focusing its
search efforts a distinct set of records rather than just a District wide search.

The timeframe for requests 7, 8, 9, 10 and 11 is from January 1, 2019 to the present date.

12. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Ending Radical Indoctrination in K-12 Schooling (<https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/>) dated January 29, 2025.

13. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (<https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>) dated January 20, 2025.

14. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Keeping Men Out of Women's Sports (<https://www.whitehouse.gov/presidential-actions/2025/02/keeping-men-out-of-womens-sports/>) dated February 5, 2025.

The timeframe for items 12, 13 & 14 above is from January 1, 2025 to the present date.

15. All documents, including communications, memorandums, MOUs, contracts, etc., regarding any requests or practices of the District to review Public Records Act requests of third parties with any employee union or collective bargaining unit ("Union"), or its state association, prior to, during and after the disclosure of records to the requesting third party. This includes any communications between the District and any Union and any person or entity (such as a law firm) on behalf of the District to any Union or its legal counsel.

The timeframe for item 15 above is from January 1, 2019 to the present date.

16. All documents, including communications, memorandums, MOUs, contracts, e-mails, etc. between the District and the Monterey County Office of Education regarding Diversity, Equity and Inclusion ("DEI") (including from the program "All In For Equity"), LGBTQ+ issues and Gender Transitions, Gender Support Plans, etc.

The timeframe for item 16 is from January 1, 2018 to the present date.

In addition, Petitioner's September 11, 2025 requested:

PUBLIC RECORDS ACT REQUEST II:

**FOR DOCUMENTS RELATED TO THE DISTRICT'S FINDINGS OF ITS
ALLOWED "DIRECT" COSTS PER GOVERNMENT
CODE SECTION 7922.530 (A)**

Since the Public Records Request Act allows the District to only charge its "direct" costs for photocopying, please disclose documents that evidence

1 how (including backup costs information or studies **not** just the District's
2 formal policy on photocopy charges) the District arrives at its "direct" cost
3 per page for photocopying charges. Please consider this request to be a
4 separate Public Records Act Request.

5 4. This request (Exhibit A) also included a request for responsive documents to be
6 delivered in electronic format if they were already stored in an electronic format. Govt. Code §
7 7922.570 and that private devices and accounts be searched for responsive documents pursuant
8 to *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

9 5. In violation of Government Code section 7922.535, Respondent did not respond
10 to Petitioner's Public Records Act request letter (Exhibit A) within 10 days or at any time up to
11 the filing of this instant Petition.

12 6. On November 13, 2025 Petitioner issued, via certified return receipt, a letter as
13 follows:
14

15 Dear Dr. Adame and Ms. Mendoza,

16 This letter is being sent on behalf of the Center for American Liberty.

17 Enclosed is a copy of my client's Public Records Act requests dated September 11, 2025.
18 To date we have not received any response to our PRA request letter.

19 Pursuant to Government Code section 7922.535 the District had ten days to acknowledge
20 receipt of the PRA requests and notify my office if the District has responsive documents.
21 That time frame has already passed.

22 If my office does not hear from the District by Noon, Monday, December 1, 2025, my
23 client will have no choice but to file a Petition for Writ of Mandate with the Superior
24 Court to enforce its rights.

25 Thank you in advance for your courtesy and cooperation in this matter.

26 Very truly yours,

27 Craig P. Alexander
28

1 A copy of Petitioner's counsel's letter of November 13, 2025 is attached hereto as
2 Exhibit B.

3 7. A copy of the return receipt card for Exhibit B is attached as Exhibit C.

4 8. Respondent did not respond to Exhibit B by December 1, 2025 or at all up to the
5 time of the filing of this Petition for Writ of Mandate. Also, as of the date of the filing of this
6 Petition, Petitioner had not received any responsive documents. This constitutes a breach of
7 Respondent's duty to disclose responsive documents promptly or at all.
8

9 9. In addition, as of the date of the filing of the original Petition, Respondent has not
10 claimed or notified Petitioner that any responsive documents have been withheld on the basis of
11 a claimed exemption and/or privilege.
12

13 10. Respondent GUSD has violated Petitioner CAL's right to obtain public records by
14 not adequately responding to Petitioner's PRA requests including its duty to assist Petitioner.
15

16 PARTIES

17 11. Petitioner and Plaintiff Center for American Liberty, (Petitioner or CAL) is a
18 nonprofit public benefit corporation organized under the laws of Virginia.

19 12. Respondent and Defendant Greenfield Union School District is a public entity and
20 it is a local agency as defined by the CPRA.

21 13. The true names of Respondent and Defendant DOES 1 through 100, inclusive are
22 unknown to Petitioner who therefore brings this Petition and Complaint against DOES 1 through
23 100, inclusive by such fictitious names, and will seek leave of this Petition, Writ and Complaint
24 to show their true names, identities, and capacities when they have been determined.
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14. DOES 1 through 100 includes Greenfield Union School District officials, employees, contractors, and other agents who have public records relating to Agency business in their possession.

15. Each Respondent and Defendant, including the DOE Respondents and Defendants, are each other's agents and at all relevant times were acting as each other's agents. Together, all Respondents and Defendants are the "Respondents."

JURISDICTION

16. Pursuant to Government Code section 7923.000, “any person may institute proceedings for injunctive or declarative relief or writ of mandate in any court of competent jurisdiction to enforce his or her right to inspect or to receive a copy of any public record or class of public records under [the CPRA].”

17. Petitioner is a person, as defined by the code, and is suing to enforce its right to receive public records. Petitioner has standing to bring this action. *Connell v. Super. Ct. (Intersource, Inc.)* (1997) 56 CA4th 601, 611.

18. The Monterey County Superior Court is the proper venue because the acts complained of, which are the subject of this Petition, Writ and Complaint, have all occurred or will all occur in the County of Monterey, State of California. The relief sought in this Petition, Writ and Complaint is within the jurisdiction of this Court.

SUMMARY OF PERTINENT CALIFORNIA PUBLIC RECORDS ACT PROVISIONS

19. In enacting the CPRA, the Legislature declared that “access to information concerning the conduct of the people’s business is a fundamental and necessary right of every person in this state.” (§ 7921.000)

1 20. The CPRA requires that a local agency respond to a request for public records
2 within 10 days to inform the requestor whether it possess disclosable public records that are
3 responsive to the request (§ 7922.535 (a)). A local agency is permitted one fourteen-day
4 extension only if one of four specified “unusual circumstances” exists. (§ 7922.535 (b) & (c).)
5 Responsive records must be disclosed “promptly.” (§ 7922.530)

6
7 21. A local agency has a duty to assist the requestor in formulating a focused and
8 effective request. (§ 7922.600)

9 22. Local agencies may not charge more than the agency’s “direct costs of
10 duplication” for copies of records. (§ 7922.530 (a)) Direct costs of duplication are limited to the
11 costs of making copies and do not include time spent searching for and reviewing records. (*North*
12 *County Parents Organization v. Dept. of Education* (1994) 23 Cal.App.4th 144, 147.)

13
14 23. An agency may not charge a requestor of responsive documents for the act of
15 searching for those documents or for review and redaction of any portion of a responsive
16 document where the agency is claiming it is subject to an exemption or privilege. *National*
17 *Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

18
19 24. A local agency must, upon request, provide information in the electronic format it
20 is stored in (§ 7922.570).

21 25. A local agency must, upon request, provide a copy of any contract it has entered
22 into for goods or services. (§ 7928.801).

23
24 26. “Purpose of request for disclosure; effect. This division does not allow limitations
25 on the access to a public records based upon the purpose for which the request is being
26 requested, if the record is otherwise subject to disclosure.” (§ 7921.300)

1 27. Where the documents requested do not contain the substance of or excerpts from
2 “actual discussions or debate, or information showing how government policy was formed” and
3 nothing in the requested documents will impede future discussions and debate on policy, the
4 deliberative process exemption does not apply to justify denial of records disclosure. *Caldecott v.*
5 *Superior Court* (2015) 243 Cal. app. 4th 212, 234-235.

6 28. Documents that are not predicational or deliberative but reflect the
7 implementation of policy are not subject to the deliberative process exemption. *American Civil*
8 *Liberties Union of Northern California v. Superior Court* (2011) 202 Cal. App. 4th 55, 76.

9 29. When being applied to grant access to information, the CPRA must be interpreted
10 broadly, and when being applied to deny access to information, CPRA exemptions must be
11 interpreted narrowly (Cal. Const., art. I, § 3).

12 30. When public officials conduct the people’s business on private devices and
13 accounts such as texting on privately owned cell phones or sending email using privately held
14 electronic mail accounts, these records are subject to disclosure under the CPRA as if they were
15 created on agency-owned devices. (*City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th
16 608.). At no time up to the filing of the original Petition, did Respondent include a statement that
17 it had searched or caused to be searched any employee and/or trustee private devices for
18 responsive public records.

19 31. At the time of the filing of this Petition, it does not appear that Respondent is
20 claiming any privileges / exemptions to withhold partially or wholly as no advise of same was
21 made by Respondent to Petitioner. An agency opposing disclosure has the burden of proof that
22 an exemption / privilege applies. *Am. C.L. Union of N. California v. Superior Ct.*, (2011) 202
23 Cal. App. 4th 55, 67.

FIRST CAUSE OF ACTION
(Writ of Mandate — Gov. Code §§ 7923.000 – 7923.005)
Against all Respondents

32. Petitioner incorporates by reference all prior allegations and all prior paragraphs.

33. Respondent, a local public agency, is required to comply with Petitioner's CPRA requests. Respondents have a ministerial duty to comply with the CPRA by promptly providing documents responsive to CPRA requests.

34. Petitioner requests that a Writ of Mandate issue to compel Respondents to search for and disclose the public records and documents that are responsive to Petitioner's CPRA requests described herein, including those improperly withheld on the basis of general alleged exemptions and/or privileges, if any.

35. As of the filing of the original Petition, Petitioner's effort to obtain the records without litigation were unsuccessful, and Petitioner had no further administrative remedies. Petitioner's attempt to, in effect, meet and confer with Respondent, was unsuccessful. Therefore, there is no other adequate remedy in the ordinary course of law. Indeed, the CPRA specifically authorizes writ of mandate as a remedy for CPRA violations.

SECOND CAUSE OF ACTION
(Declaratory Relief — Gov. Code §§ 7923.000 – 7923.005)
Against all Respondents

36. Petitioner incorporates by reference all prior allegations and all prior paragraphs.

37. There is an actual and justiciable controversy between the parties as to whether Respondents' actions have complied with the California Public Records Act.

38. Petitioner alleges that Respondents have committed the following CPRA violations:

- 1 a. On information and belief, failure to conduct a proper, reasonable and complete search
2 for the various responsive records in response to CAL's CPRA requests.
- 3 b. Failure to make a sufficient written determination as to whether Respondent possesses
4 disclosable public documents/records including e-mails, studies, research, data, text
5 messages, or other documents responsive to Petitioner's requests after more than the
6 maximum 10 days (plus any 14-day extension) allowed under Government Code §
7 6253(a);
- 8 c. Failure to disclose records and documents responsive to CAL's CPRA requests at all;
- 9 d. Failure to disclose records and documents responsive to CAL's CPRA requests that are
10 not properly subject to an exemption under the California Public Records Act;
- 11 e. Failure to disclose records that are in its possession and/or constructive possession; and /
12 or
- 13 f. Failure to "promptly" disclose responsive public records as required by the CPRA.

14
15
16 39. There is an actual controversy with respect to these violations because on
17 information and belief, Respondents dispute the factual basis for the violation and/or whether the
18 actions described violate the CPRA.

19
20 40. Declaratory relief is necessary to resolve these controversies and determine
21 whether Respondents have violated the CPRA as described above.

22
23 41. The CPRA specifically authorizes declaratory relief.

24 **THIRD CAUSE OF ACTION**
25 (Injunctive Relief — Gov. Code §§ 7923.000 – 7923.005)
26 Against all Respondents

27
28 42. Petitioner incorporates by reference all prior allegations and all prior paragraphs.

43. The CPRA specifically authorizes injunctive relief as a remedy for CPRA violations.

44. Respondents have failed to respond with any documents responsive to the request for records related to how Respondent determined the costs it can or will charge for providing photocopies of responsive documents/information.

45. As of the original filing of Petitioner's Petition, Respondents had failed to properly search for documents and/or had not disclosed responsive records to Petitioner.

46. The CPRA requires disclosure of public records regardless of whether the records are in the responding agency's actual possession. Records in the possession of an agency's employees or elected officials are public records even if the records are not under the agency's immediate control.

47. Petitioner seeks injunctive relief to:

g. Compel Respondents to disclose all public records responsive to CAL's September 11, 2025 CPRA request that are in Respondents possession; and

h. Compel Respondents to disclose all responsive records not properly subject to an exemption or privilege.

48. There is no monetary compensation that could adequately compensate Petitioner or any other affected party for the infringement of this right.

49. Injunctive relief is necessary to prevent ongoing and future infringement of the public's right to receive public records from Respondents in a timely fashion. Petitioner requests injunctive relief to ensure Respondents' compliance with the CPRA.

PRAYER FOR RELIEF

Wherefore, Petitioner prays that this court:

As to the First Cause of Action:

50. Issue Peremptory and/or Alternative Writ of Mandate ordering Respondents to promptly conduct a proper search for responsive records and to disclose to Petitioner all improperly withheld records.

51. That for any documents Respondent EUSD determines to withhold from Petitioner (either partially via redactions or in its entirety) to prepare and submit to Petitioner a privilege log containing the following information: the author of the document(s), the recipient(s) of the document(s), the “cc” recipient(s) of the document, if any author and/or recipient of a document is an attorney, the California State Bar number for that attorney, the date of the document(s), the type of document (memorandum, letter, electronic mail, etc.), a brief description of the document’s title and subject matter and the exemption / privilege claimed; and

52. Issue a Peremptory and/or Alternative Writ of Mandate to order Respondents to ensure that its Trustees and employees search their personal email accounts and electronic devices for records responsive to Petitioner’s request;

As to the Second Cause of Action:

53. Enter a declaratory judgment that Respondents violated the CPRA by:

- a) Failing to search for and disclose responsive public records-that that Respondent and its employees and officials possess in Respondent’s physical and electronic files;
- b) Failing to search for and disclose responsive public records that that Respondent’s employees and officials possess in their personal files, email accounts, and electronic devices;

- 1 c) Failure to make a written determination as to whether Respondent possesses
2 disclosable public records;
3 d) Failing to promptly disclose the records that are responsive to Petitioner's CPRA
4 requests; and
5 e) Failure to disclose records that are not properly subject to an exemption /
6 privilege under the California Public Records Act;
7
8 and order Respondent to comply with its duties to Petitioner under the CPRA.

9 As to the Third Cause of Action:

10 54. Issue an order compelling Respondents to search their private email accounts,
11 computers, and other electronic devices for public records that are responsive to Petitioner's
12 request and disclose same to Petitioner;
13

14 55. Issue an order compelling Respondent to search for and disclose to Petitioner all
15 responsive records not subject to any proper claim of exemption or privilege; and
16

17 As to all Causes of Action:

18 56. Award Petitioner's attorneys' fees and costs reasonably incurred in this action;
19 and

20 57. For such other and further relief as the Court deems proper.
21

22 Dated: January 23, 2026

Respectfully submitted,
LAW OFFICE OF CRAIG P. ALEXANDER

24 By: *Craig P. Alexander*

25 _____
26 Craig P. Alexander,
27 Attorneys for Petitioner and Plaintiff
28 Center for American Liberty, Inc.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s/ Josh Dixon
Josh Dixon
Director of Litigation
Center for American Liberty

TABLE OF EXHIBITS

Exhibit	Description	Reference
A	CAL's September 11, 2025 CPRA Request	¶ 3
B	CAL's November 13, 2025 letter to Respondent	¶ 6
C	The Return Receipt card for the November 13, 2025 letter to Respondent	¶ 7

EXHIBIT “A”

Law Offices of Craig P. Alexander

24681 La Plaza, Suite 250

Dana Point, CA 92629

Office: 949-481-6400 Facsimile: 949-242-2545

E-mail: craig@craigalexanderlaw.com

SENT VIA ELECTRONIC MAIL (MARROYO@GREENFIELD.K12.CA.US) ONLY

September 11, 2025

Dr. Laura Cortez,
Superintendent
Ms. Maria Arroyo,
Confidential Administrative Secretary
Greenfield Unified School District
493 El Camino Real
Greenfield, CA 93927

RE: California Public Records Act Requests

Dear Dr. Cortez and Ms. Arroyo,

This letter is being sent on behalf of the Center for American Liberty. I ask that you direct this letter to the responsible personnel to respond to my client's CPRA requests.

PUBLIC RECORDS ACT REQUEST I:

Pursuant to the California Public Records Act, Govt. Code §§ 7920.000 – 7930.215, Center for American Liberty ("Requestor") respectfully requests to inspect all public records in the possession or control of the District ("District") for the following:

1. I request to have sent to my office the policy(s) and procedures adopted by the District for compliance with the District's obligations to maintain Pupil Records and disclose same to parents / guardians as defined under Education Code sections 49061 & 49069.7 and under the Family Educational Right and Privacy Act (FERPA), 20 U.S.C. section 1232g and 34 CFR Part 99. In addition, I request that the District disclose to my client any policy(s) and procedures regarding or describing or handling "informal notes related to an identifiable pupil compiled by a school officer or employee." Education code section 49061 (b). This specifically includes any document or documents that define what the District considers to be or defines "informal notes" as described in Education code section 49061 (b) and set forth the basis for releasing to or withholding from a parent or guardian any such "informal notes" about a student (also known as granting or denying "access" as defined by Education Code section 49061 (e)).

2. Also, my client requests to review / receive any policy(s) and procedures adopted by the District for compliance with Assembly Bill 1266, the School Success and Opportunity Act of 2013 and Education Code section 221.5.
3. My client requests to review / receive any policy(s) and procedures adopted by the District for compliance with Assembly Bill 329, the California Healthy Youth Act of 2015 (California Education Code sections 51930–51939).
4. Any policy and procedures, and related communications about, whether or not adopted by the District for creation of and implementation of Gender Support Plan(s) or any similar plans (such as Gender Transition Plan or Individual Transition Plan) for students transitioning genders or having gender questioning including but not limited to the use of pronouns for the affected student(s). *Even if your District does not utilize such a form, we still request the District's communications and instructions, etc. on implementing the purposes of gender transition by the District such as any Frequently Asked Questions (FAQ) memos on this subject.* Please also forward a copy of the minutes of the Board of Trustees adopting the use of (or non-approval) of such a transition form. If no such minutes on this topic exists I request the District to advise that no records exist on this specific topic / vote.
5. Also my client wishes for the District to disclose any records stating how many students (the number of students not their names or identities) have entered into or are subject to one of these Plans / Agreements for each academic year from August 1, 2019 to the present date.

The timeframe for Requests 1, 2, 3, 4 and 5 is from January 1, 2019 to the present date.

6. Any and all documents, including any policies and procedures adopted by the District and any communications, concerning the District's implementation of Assembly Bill 1955 of 2024 (entitled "Support Academic Futures and Educators for Today's Youth Act") filed with the Secretary of State on July 15, 2024. Education code sections 220.1, 220.3 and 220.5.

The timeframe for request 6 above is from January 1, 2024 to the present date.

7. I request the District send my office all documents, handouts, PowerPoint / media presentations, videos, etc. used by any guest speakers for any topics related to the curriculum / teaching about the matters covered in items 1 through 6 above. This would include any materials about any such guest speaker including, for example, his/her Curriculum Vite, Resume, Biography, etc. and any invoice for services for that guest speaker's presentation. Also, any communications between any employee and any guest speaker, between employees about any such guest speaker and between any District employees and/or any third parties about any such guest speaker. If any writing / responsive records includes the name of any student, I ask that the District redact that student's name and forward to me the

document in redacted form. This request also includes any responsive records kept in electronic form.

8. For any communications, contracts, memorandums of understanding, purchase orders, invoices and evidences of payment, such as warrants, checks, ACH transactions, wire transfers, etc., if any, between the District and the following organizations / entities / persons: Lexia, the ACLU, Planned Parenthood (including any of its local affiliates), the Trevor Project, Genders & Sexualities Alliance Network, LGBT National Hotline, GLAD, Parker-Anderson Enrichment and GLSEN. Also for Health Connect, Gender Spectrum, the Human Rights Campaign, Hazel Health, Care Solace, GSA Network, Trans lifeline, TransYouth Family Allies, PFLAG Transgender Network, California Coalition for Youth, California Valued Trust, Edventure More, Paper Wing Theater A.C.T., West End, Elevo, EveryChild CA Asso. of Leaders, Soliant Health, LLC, Maxim Healthcare Services Hold, Hijos Del Sol Arts Productions, Harmony At Home, School Solutions, LLC, Valley Health Associates, Learner-Centered Collaborative, Engage Learning, Inc., and CASEL.
9. Any correspondence, minutes, presentations, PowerPoint presentations and/or videos, including electronic communication and in paper format, regarding any curriculum and/or supplemental curriculum and/or instructional materials and/or teacher training materials (and the actual curriculum / instructional materials / teacher training) in any way regarding the District's programs / curriculum and the supplemental curriculum itself regarding Ruler and the Yale University Center for Emotional Intelligence, Committee for Children, Second Step, Character Strong, Social Emotional Learning, Ethnic Studies, Critical Race Theory, Curriculum Assoc., LLC, Ed Theory, LLC, Lakeshore Learning Materials, ABA Network, Casa Pacifica, Diversity, Equity & Inclusion ("DEI"), Intersectionality, Transgenderism, Sanford Harmony, structural racism, and / or social justice and any Equity Committee.
10. Any invoices, purchase orders, checks, warrants or any other form of payment by District to any persons or organizations for curriculum, teacher training, public relations, parent interactions, etc. regarding the topics described paragraphs 9 & 10. For this item, I wish to make clear that we request a copy of any contracts, P.O.s, MOUs, etc. for any vendor the District has purchased curriculum materials, teacher training materials or ancillary materials from (such as a video or PowerPoint to use with the curriculum materials in the classroom and/or teacher training). This is most important for any instance where the District makes any claims of exemption / privilege to deny CAL access to any responsive documents.
11. For communications (electronic and in paper format) by and between employees and / or trustees of the District internally and/or with any third parties regarding the implementation of matters stated in requests numbers 1 through 10 above.

For these items above, I recommend to the District that it begin its search for these communications by starting with the person(s) or Department(s) that were

tasked with answering questions from District staff and/or third parties about the implementation of these policies and procedures.

For example, the person(s) answering questions of District staff about filling out, safe keeping, responses for request to see records by parents / guardians regarding any Gender Support Plan (such as making changes or not to the student's permanent pupil records, etc.). Or questions regarding what is included in "Pupil records" a parent or guardian may see under Education Code sections 49061 & 49069.7 and if that includes a filled-out Gender Support Plan (if any) or not. Another example would be about the implementation of new curriculum or instructional materials pursuant to any of the statutes listed above. It is hoped that this suggestion will assist the District in focusing its search efforts a distinct set of records rather than just a District wide search.

The timeframe for requests 7, 8, 9, 10 and 11 is from January 1, 2019 to the present date.

12. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Ending Radical Indoctrination in K-12 Schooling (<https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/>) dated January 29, 2025.
13. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (<https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>) dated January 20, 2025.
14. Any and all documents, including any communications, regarding President Trump's Executive Order entitled Keeping Men Out of Women's Sports (<https://www.whitehouse.gov/presidential-actions/2025/02/keeping-men-out-of-womens-sports/>) dated February 5, 2025.

The timeframe for items 12, 13 & 14 above is from January 1, 2025 to the present date.

15. All documents, including communications, memorandums, MOUs, contracts, etc., regarding any requests or practices of the District to review Public Records Act requests of third parties with any employee union or collective bargaining unit ("Union"), or its state association, prior to, during and after the disclosure of records to the requesting third party. This includes any communications between the District and any Union and any person or entity (such as a law firm) on behalf of the District to any Union or its legal counsel.

The timeframe for item 15 above is from January 1, 2019 to the present date.

16. All documents, including communications, memorandums, MOUs, contracts, e-mails, etc. between the District and the Monterey County Office of Education regarding Diversity, Equity and Inclusion (“DEI”) (including from the program “All In For Equity”), LGBTQ+ issues and Gender Transitions, Gender Support Plans, etc.

The timeframe for item 16 is from January 1, 2018 to the present date.

For all categories above, if any documents contain the names, home addresses, personal telephone numbers of specific students, we ask that you redact those names from the document(s) and forward the redacted document(s) to us. However, we expect the District will NOT redact the names of District staff or third parties (non-students) who may appear in responsive documents as that is not allowed under the PRA statute and case law. *Iloh v. Regents of Univ. of California*, (2023) 87 Cal. App. 5th 513, 527–28, reh'g denied (Feb. 6, 2023), review denied (Apr. 12, 2023) and *Commission on Peace Officer Standards & Training v. Superior Court* (2007) 42 Cal. 4th 278, 288. I note that my client’s requests do NOT include any employee personnel files.

Also, for all categories above, if a responsive document is on your web site, providing us with a working web link and a listing of the document (example: BP 0410) or the agenda number and page number of a board package is sufficient. If we have trouble accessing the page or document we will work with you about that.

These requests are for all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, memorandums, messages) whether or not those communications are stored in the District’s files and/or servers or on personal devices / accounts such as private electronic mail accounts or cellular telephones or cellular telephones issued by the District to any District personnel. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

We note that “A state or local agency may not allow another party to control the disclosure of information that is otherwise subject to disclosure pursuant to this division.” Government Code section 7921.005. *Register Division of Freedom Newspapers v. County of Orange* (1984) 158 Cal. App. 3d 893, 903 (settlement related documents, including settlement agreements, are subject to disclosure under the PRA. Assurances of confidentiality are not sufficient to transform a public record into a private one).

Also, contracts for goods or services entered into by an agency (here a school district) and a third party must be disclosed under the Public Records Act. Government Code section 7928.801.

PUBLIC RECORDS ACT REQUEST II:

FOR DOCUMENTS RELATED TO THE DISTRICT’S FINDINGS OF ITS ALLOWED “DIRECT” COSTS PER GOVERNMENT CODE SECTION 7922.530 (A)

Since the Public Records Request Act allows the District to only charge its “direct” costs for photocopying, please disclose documents that evidence how (including backup costs information or studies **not** just the District’s formal policy on photocopy charges) the District arrives at its “direct” cost per page for photocopying charges. Please consider this request to be a separate Public Records Act Request.

**REQUEST FOR INFORMATION IN ELECTRONIC FORMAT PURSUANT TO
GOVERNMENT CODE SECTION 7922.570 (A) & (B)**

My client is seeking these records in all electronic formats your office keeps them in. Under the Public Records Act, the District’s office is required to deliver the information in whatever electronic format it is in **no matter whether it is Excel, Word, WordPerfect or some other program or programs.** Government Code section 7922.570 (a) & (b). **My client’s request extends to receipt of this information in the electronic format your office maintains these records in.** Delivery of this information to me by electronic mail (craig@craigalexanderlaw.com) or via a thumb drive or via a disk is fine. I can supply the District with a thumb drive if needed. *Please advise what electronic format these records are kept in.*

In addition, if there are documents that satisfy this request that are in **both** electronic and paper formats, *my client offers to receive the electronic version of those records and forgo inspection and potential photocopying of those paper copies.* It is hoped that this will save the District and my client’s time, trouble and expense.

If you anticipate that data compilation, extraction, or programming will be required to satisfy a request (per Section 7922.575 (b) (2)), please provide a written estimate and justification for same.

In addition, on May 28, 2020 the California Supreme Court ruled that an agency may not charge a requestor of responsive documents for the act of searching for those documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege. *National Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

REQUEST FOR INSPECTION OF DOCUMENTS

For any records not delivered electronically, my client elects to inspect these non-electronic records. Once my client’s agent and/or I have had an opportunity to inspect these records, we will designate which documents we will wish to obtain copies from your office and its agents, employees, consultants, etc. I also note that under Government Code section 7922.530 (b) my client’s agent has the right to use their own equipment (usually a cell phone) to take photos of the responsive documents being inspected.

The California Public Records Act requires the District’s office to “reveal the general nature of the documents withheld,” and to “set forth the names and titles or positions of each person responsible for the denial.” Cal. Govt. Code Section 7922.540. I emphasize

my client's request for a specific response and all applicable exemptions to the request. A blanket list of exemptions that may or may not apply to the request coupled with a failure to indicate the existence of documents responsive to the request denies us the ability to evaluate whether the District has justifiably withheld responsive documents. Denying my client her opportunity frustrates the Legislature's primary purpose in enacting the California Public Records Act, which is to "maximize public access to agency records."

There is no question that your office is a public entity subject to the Public Records Act pursuant to Government Code section 7920.525 and it must comply with the Request as set forth under the Act.

Terms utilized that are defined by the California Public Records Act should be given their full meaning. Thus, for example, a request for any "writing" includes a request for "any handwriting, typewriting, printing, Photostatting, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored. Cal. Govt Code section 7920.545. In keeping with the provisions of the California Public Records Act, "writing" includes any preliminary drafts, notes or interagency or intra-agency memoranda" unless such draft items are "not retained...in the ordinary course of business" and "the public interest in withholding clearly outweighs the public interest in disclosure."

Additionally, certain common terms should be given broad interpretation. For example, "relating to" means, in addition to the usual and customary meaning, depict or depicting, discuss or discussing, refer to or referring, reflect or reflecting, support or supporting, refute or refuting, address or addressing, evidence or evidencing, or record or recording.

For the purposes of this letter, a reference to an entity or body, such as the District's office includes all representatives of the entity or body.

**REQUEST FOR ASSISTANCE, IF NEEDED, PURSUANT
TO GOVERNMENT CODE SECTION 7922.600**

While my client believes its request is fully understandable, concise and specific for the District to search for, review and disclose responsive documents, if the District has any confusion over my client's requests, under Government Code section 7922.600 the District has a duty to communicate with us about the requests. Towards that end, I am available to discuss this matter with you by phone or e-mail (phone preferred). Thank you.

**THE DISTRICT'S RESPONSE TO
OUR REQUESTS ARE DUE WITHIN TEN DAYS**

In accordance with Section 7922.535, please contact me within ten (10) days of your receipt of this request and notify me whether this request seeks copies of dis-closable public records in the District's possession, and, if not, the reasons for such determination. We will wish to make an appointment with you to review the dis-closable records at your office.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,

Craig P. Alexander

Craig P. Alexander

EXHIBIT “B”

Law Offices of Craig P. Alexander

24681 La Plaza, Suite 250

Dana Point, CA 92629

Office: 949-481-6400 Facsimile: 949-242-2545

E-mail: craig@craigalexanderlaw.com

VIA US MAIL CERTIFIED RETURN RECEIPT

November 13, 2025

Dr. Laura Cortez,
Superintendent
Ms. Maria Arroyo,
Confidential Administrative Secretary
Greenfield Unified School District
493 El Camino Real
Greenfield, CA 93927

RE: California Public Records Act Requests

Dear Dr. Cortez and Ms. Arroyo,

This letter is being sent on behalf of the Center for American Liberty.

Enclosed is a copy of my client's Public Records Act requests dated September 11, 2025. To date we have not received any response to our PRA request letter.

Pursuant to Government Code section 7922.535 the District had ten days to acknowledge receipt of the PRA requests and notify my office if the District has responsive documents. That time frame has already passed.

If my office does not hear from the District by **Noon, Monday, December 1, 2025**, my client will have no choice but to file a Petition for Writ of Mandate with the Superior Court to enforce its rights.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,

Craig P. Alexander

Craig P. Alexander

EXHIBIT “C”

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

GREENFIELD UNIFIED S.D.
493 EL CAMINO REAL
GREENFIELD, CA 93927



9590 9402 9115 4225 3269 85

Article Number (Transfer from card)

7022 1670 0002 2955 7461

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Sarah Lopez☐ Agent☐ Addressee

B. Received by (Printed Name)

Sarah Lopez

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☐ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Insured Mail Restricted Delivery☐ Insured Mail Restricted Delivery
(over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted
Delivery☐ Signature Confirmation™☐ Signature Confirmation
Restricted Delivery

USPS TRACKING #



SAN JOSE CA 950

19 NOV 2025 PM 4 L



First-Class Mail
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USPS
Permit No. G-10

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United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

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DANA POINT, CA
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