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9 Center for American Liberty

ELECTRONICALLY FILED  
Superior Court of California  
County of Santa Cruz  
12/23/2025 12:29 PM  
Clerk of the Court by Deputy,  
Crystal Rozinsky



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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF SANTA CRUZ — SANTA CRUZ COURTHOUSE**

**Center for American Liberty,**  
a Virginia Not for Profit corporation;  
  
Petitioner and Plaintiff  
  
vs.  
  
**Pajaro Valley Unified School District;**  
and DOES 1 through 100, inclusive  
  
Respondents and Defendants.

Case No.: 25CV04133  
Judge:  
Dept:

UNLIMITED JURISDICTION

**Verified 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 follows:

1. In this action, CAL seeks to enforce its right to obtain public records pursuant to the California Public Records Act, Government Code<sup>1</sup> section 7920.000<sup>2</sup> (“CPRA”) for several CPRA requests to Respondent.

**FACTS**

2. This matter is regarding Public Records Act requests contained in letters from Petitioner to Respondent Pajaro Valley Unified School District.

<sup>1</sup> All undesignated code references are to the Government Code.

<sup>2</sup> 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.

**PUBLIC RECORDS REQUEST (#1) OF OCTOBER 14, 2025**

1  
2           3.       On or about October 14, 2025 Petitioner issued a Public Records Act (“CPRA”) request to the Respondent Pajaro Valley Unified School District (“PVUSD” or “Respondent” or “agency”). A copy of CAL’s October 14, 2025 Public Records Act request is attached hereto as Exhibit A. That request was for:

**PUBLIC RECORDS ACT REQUEST I:**

8       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:

10       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)).

18       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.

21       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).

23       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

1 adopting the use of (or non-approval) of such a transition form. If no such minutes on this  
2 topic exists I request the District to advise that no records exist on this specific topic / vote.

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

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

6 6. Any and all documents, including any policies and procedures adopted by the District  
7 and any communications, concerning the District's implementation of Assembly Bill 1955  
8 of 2024 (entitled "Support Academic Futures and Educators for Today's Youth Act") filed  
9 with the Secretary of State on July 15, 2024. Education code sections 220.1, 220.3 and  
10 220.5.

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

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

23 8. For any communications, contracts, memorandums of understanding, purchase orders,  
24 invoices and evidences of payment, such as warrants, checks, ACH transactions, wire  
25 transfers, etc., if any, between the District and the following organizations / entities /  
26 persons: Lexia, the ACLU, Planned Parenthood (including any of its local affiliates), the  
27 Trevor Project, Genders & Sexualities Alliance Network, LGBT National Hotline, GLAD,  
28 Parker-Anderson Enrichment and GLSEN. Also for Health Connect, Gender Spectrum, the  
Human Rights Campaign, Hazel Health, Amerigis Healthcare, Parent Institute for Quality  
Education, Prisms of Reality, Inc., Ro Health, The SLIFE Equity Project, Lexia Learning  
Systems, LLC, Care Solace, GSA Network, Trans lifeline, TransYouth Family Allies,  
PFLAG Transgender Network, California Coalition for Youth, California Valued Trust, 21st  
Century Community Learning Centers, AMN Healthcare and Wellness Services, Ninia  
Coalition, Inc., Curriculum Associates, LLC, Imagine Learning, LLC, Swun Math, Maxim  
Healthcare, Inc., Multi-Health Systems, Inc., Pearson Education, Pro Ed, Inc., AJ Crabill,  
HMH NWEA, and CASEL.

9. Any correspondence, contracts, minutes, presentations, PowerPoint presentations and/or  
videos, including electronic communication and in paper format, regarding any curriculum

1 and/or supplemental curriculum and/or instructional materials and/or teacher training  
2 materials (and the actual curriculum / instructional materials / teacher training) in any way  
3 regarding the District’s programs / curriculum and the supplemental curriculum itself  
4 regarding Ruler and the Yale University Center for Emotional Intelligence, Committee for  
5 Children, Second Step, Character Strong, Social Emotional Learning, Ethnic Studies,  
6 Critical Race Theory, Curriculum Assoc., LLC, Ed Theory, LLC, ABA Network, Diversity,  
7 Equity & Inclusion (“DEI”), Intersectionality, Transgenderism, Sanford Harmony, structural  
8 racism, and / or social justice and any Equity Committee.

9 10. Any invoices, purchase orders, checks, warrants or any other form of payment by  
10 District to any persons or organizations for curriculum, teacher training, public relations,  
11 parent interactions, etc. regarding the topics described paragraphs 8 & 9. For this item, I  
12 wish to make clear that we request a copy of any contracts, P.O.s, MOUs, etc. for any  
13 vendor the District has purchased curriculum materials, teacher training materials or  
14 ancillary materials from (such as a video or PowerPoint to use with the curriculum materials  
15 in the classroom and/or teacher training). This is most important for any instance where the  
16 District makes any claims of exemption / privilege to deny CAL access to any responsive  
17 documents.

18 11. For communications (electronic and in paper format) by and between employees and / or  
19 trustees of the District internally and/or with any third parties regarding the implementation  
20 of matters stated in requests numbers 1 through 10 above.

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

25 For example, the person(s) answering questions of District staff about filling out, safe  
26 keeping, responses for request to see records by parents / guardians regarding any Gender  
27 Support Plan (such as making changes or not to the student’s permanent pupil records, etc.).  
28 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.

1 13. Any and all documents, including any communications, regarding President Trump’s  
2 Executive Order entitled Defending Women from Gender Ideology Extremism and  
3 Restoring Biological Trust to the Federal Government  
4 (<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.

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

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

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

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

16 In addition, CAL requested:

17 **PUBLIC RECORDS ACT REQUEST II:**

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

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

27 **PUBLIC RECORDS REQUEST (#2) OF OCTOBER 14, 2025**

28 4. Also on October 14, 2025 Petitioner CAL issued a separate letter issued a Public  
Records Act (“CPRA”) request to the Respondent Pajaro Valley Unified School District

1 (“PVUSD” or “Respondent” or “agency”). A copy of CAL’s October 14, 2025 Public Records  
2 Act request on these matters is attached hereto as Exhibit B. That request was for:

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

6 1. Any and all documents, including any communications, regarding the recent  
7 case of Mahmoud, et al v. Taylor (2025) 145 S. Ct. 2332 by the United States  
8 Supreme Court decided on June 27, 2025. This specifically includes any  
9 requests issued to the District to opt out a child from any instruction or  
10 instructional materials based upon the first amendment of the U.S. Constitution  
11 (including, but not limited to, religious liberty rights) and / or the Mahmoud, et  
12 al v. Taylor case. It also includes any policy or procedures adopted by the  
13 District or modified by the District in response to the Mahmoud, et al v. Taylor  
14 case. Please also forward a copy of the minutes of the Board of Trustees where  
15 this issue was on the Board’s agenda and any resolutions or other actions  
16 taken, if any, by the Board in response to this case. If no such minutes on this  
17 topic exists I request the District to advise that no records (minutes) exist on  
18 this specific topic / vote.

19 2. Any Public Records Act requests to the District and the District’s responses to  
20 those requests for records related to the Mahmoud, et al v. Taylor case.

21 Petitioner added that “The timeframe for this request above is from June 1, 2025 to the  
22 present date.”

23 5. These requests (Exhibits A & B) also included requests for responsive documents  
24 to be delivered in electronic format if they were already stored in an electronic format. Govt.  
25 Code § 7922.570 and that private devices and accounts be searched for responsive documents  
26 pursuant to City of San Jose v. Superior Court (Smith) (2017) 2 Cal. 5th 608.

27 6. A copy of a “read” e-mail indicating that Superintendent Contraras had read  
28 October 14, 2025 e-mail with Exhibits A & B is attached hereto as Exhibit C.

1 In violation of Government Code section 7922.535, Respondent did not respond  
2 to Petitioner’s Public Records Act request letters (Exhibits A or B) within 10 days or at any time  
3 up to the filing of this instant Petition.

1           8.       On November 13, 2025 Petitioner issued, via certified return receipt, a letter as  
2 follows:

3           Dear Superintendent Contreras and Ms. Renteria,

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

5           Enclosed is a copy of my client's Public Records Act requests (two letters) dated October  
6 14, 2025. To date we have not received any response to either PRA request letter.

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

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

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

14          Very truly yours,

15          Craig P. Alexander

16          A copy of Petitioner's counsel's letter of November 13, 2025 is attached hereto as  
17 Exhibit D.

18          9.       A copy of the return receipt card for Exhibit D is attached as Exhibit E.

19          10.      Respondent did not respond to Exhibit D by December 1, 2025 or at all up to the  
20 time of the filing of this Petition for Writ of Mandate. Also, as of the date of the filing of this  
21 Petition, Petitioner had not received any responsive documents. This constitutes a breach of  
22 Respondent's duty to disclose responsive documents promptly or at all.  
23

24          11.      In addition, as of the date of the filing of the original Petition, Respondent has not  
25 claimed or notified Petitioner that any responsive documents have been withheld on the basis of  
26 a claimed exemption and/or privilege.  
27  
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1           19.     Petitioner is a person, as defined by the code, and is suing to enforce its right to  
2 receive public records. Petitioner has standing to bring this action. *Connell v. Super. Ct.*  
3 (*Intersource, Inc.*) (1997) 56 CA4th 601, 611.

4           20.     The Santa Cruz County Superior Court is the proper venue because the acts  
5 complained of, which are the subject of this Petition, Writ and Complaint, have all occurred or  
6 will all occur in the County of Santa Cruz, State of California. The relief sought in this Petition,  
7 Writ and Complaint is within the jurisdiction of this Court.

8  
9                           **SUMMARY OF PERTINENT CALIFORNIA PUBLIC RECORDS ACT PROVISIONS**

10  
11           21.     In enacting the CPRA, the Legislature declared that “access to information  
12 concerning the conduct of the people’s business is a fundamental and necessary right of every  
13 person in this state.” (§ 7921.000)

14  
15           22.     The CPRA requires that a local agency respond to a request for public records  
16 within 10 days to inform the requestor whether it possess disclosable public records that are  
17 responsive to the request (§ 7922.535 (a)). A local agency is permitted one fourteen-day  
18 extension only if one of four specified “unusual circumstances” exists. (§ 7922.535 (b) & (c).)  
19 Responsive records must be disclosed “promptly.” (§ 7922.530)

20  
21           23.     A local agency has a duty to assist the requestor in formulating a focused and  
22 effective request. (§ 7922.600)

23           24.     Local agencies may not charge more than the agency’s “direct costs of  
24 duplication” for copies of records. (§ 7922.530 (a)) Direct costs of duplication are limited to the  
25 costs of making copies and do not include time spent searching for and reviewing records. (*North*  
26 *County Parents Organization v. Dept. of Education* (1994) 23 Cal.App.4th 144, 147.)  
27  
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1           25.     An agency may not charge a requestor of responsive documents for the act of  
2 searching for those documents or for review and redaction of any portion of a responsive  
3 document where the agency is claiming it is subject to an exemption or privilege. *National*  
4 *Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

5           26.     A local agency must, upon request, provide information in the electronic format it  
6 is stored in (§ 7922.570).

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

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

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

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

20           31.     When being applied to grant access to information, the CPRA must be interpreted  
21 broadly, and when being applied to deny access to information, CPRA exemptions must be  
22 interpreted narrowly (Cal. Const., art. I, § 3).





- 1 e. Failure to disclose records that are in its possession and/or constructive possession; and /  
2 or  
3 f. Failure to “promptly” disclose responsive public records as required by the CPRA.

4 41. There is an actual controversy with respect to these violations because on  
5 information and belief, Respondents dispute the factual basis for the violation and/or whether the  
6 actions described violate the CPRA.  
7

8 42. Declaratory relief is necessary to resolve these controversies and determine  
9 whether Respondents have violated the CPRA as described above.

10 43. The CPRA specifically authorizes declaratory relief.  
11

12 **THIRD CAUSE OF ACTION**  
13 (Injunctive Relief — Gov. Code §§ 7923.000 – 7923.005)  
14 Against all Respondents

15 44. Petitioner incorporates by reference all prior allegations and all prior paragraphs.

16 45. The CPRA specifically authorizes injunctive relief as a remedy for CPRA  
17 violations.  
18

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

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

24 48. The CPRA requires disclosure of public records regardless of whether the records  
25 are in the responding agency’s actual possession. Records in the possession of an agency’s  
26 employees or elected officials are public records even if the records are not under the agency’s  
27 immediate control.  
28



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

4           As to the Second Cause of Action:

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

- 6           a) Failing to search for and disclose responsive public records-that that Respondent  
7           and its employees and officials possess in Respondent’s physical and electronic  
8           files;  
9           b) Failing to search for and disclose responsive public records that that Respondent’s  
10           employees and officials possess in their personal files, email accounts, and  
11           electronic devices;  
12           c) Failure to make a written determination as to whether Respondent possesses  
13           disclosable public records;  
14           d) Failing to promptly disclose the records that are responsive to Petitioner’s CPRA  
15           requests; and  
16           e) Failure to disclose records that are not properly subject to an exemption /  
17           privilege under the California Public Records Act;  
18           and order Respondent to comply with its duties to Petitioner under the CPRA.

19           As to the Third Cause of Action:

20           56.     Issue an order compelling Respondents to search their private email accounts,  
21 computers, and other electronic devices for public records that are responsive to Petitioner’s  
22 request and disclose same to Petitioner;  
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**TABLE OF EXHIBITS**

<b>Exhibit</b>	<b>Description</b>	<b>Reference</b>
<b>A</b>	<b>CAL's October 14, 2025 CPRA Request #1</b>	<b>¶ 3</b>
<b>B</b>	<b>CAL's October 14, 2025 CPRA Request #2</b>	<b>¶ 5</b>
<b>C</b>	<b>Copy of "Read" e-mail with Exhibits A &amp; B dated October 14, 2025</b>	<b>¶ 6</b>
<b>D</b>	<b>Copy of November 13, 2025 letter to Respondent</b>	<b>¶ 8</b>
<b>E</b>	<b>The Return Receipt card for the November 13, 2025 letter to Respondent</b>	<b>¶ 9</b>

# **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](mailto:craig@craigalexanderlaw.com)*

**VIA ELECTRONIC MAIL (HEATHER CONTRERAS@PVUSD.NET & EVA RENTERIA@PVUSD.NET) ONLY**

October 14, 2025

Dr. Heather Contreras,  
Superintendent  
Eva Renteria,  
Executive Assistant,  
Pajaro Valley Unified School District  
294 Green Valley Road  
Watsonville, CA 95076

RE: California Public Records Act Requests

Dear Superintendent Contreras and Ms. Renteria,

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.

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

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.
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, Amerigis Healthcare, Parent Institute for Quality Education, Prisms of Reality, Inc., Ro Health, The SLIFE Equity Project, Lexia Learning Systems, LLC, Care Solace, GSA Network, Trans lifeline, TransYouth Family Allies, PFLAG Transgender Network, California Coalition for Youth, California Valued Trust, 21<sup>st</sup> Century Community Learning Centers, AMN Healthcare and Wellness Services, Ninia Coalition, Inc., Curriculum Associates, LLC, Imagine Learning, LLC, Swun Math, Maxim Healthcare, Inc., Multi-Health Systems, Inc., Pearson Education, Pro Ed, Inc., AJ Crabill, HMH NWEA, and CASEL.
9. Any correspondence, contracts, 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, ABA Network, 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 8 & 9. 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.

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. 4<sup>th</sup> 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. 5<sup>th</sup> 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. 5<sup>th</sup> 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.

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](mailto:craig@craigalexanderlaw.com)

**VIA ELECTRONIC MAIL (HEATHER CONTRERAS@PVUSD.NET &  
EVA RENTERIA@PVUSD.NET) ONLY**

October 14, 2025

Dr. Heather Contreras,  
Superintendent  
Eva Renteria,  
Executive Assistant,  
Pajaro Valley Unified School District  
294 Green Valley Road  
Watsonville, CA 95076

RE: California Public Records Act Requests

Dear Superintendent Contreras and Ms. Renteria,

This letter is being sent on behalf of my client the Center for American Liberty, Inc. I request 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. Any and all documents, including any communications, regarding the recent case of *Mahmoud, et al v. Taylor* (2025) 145 S. Ct. 2332 by the United States Supreme Court decided on June 27, 2025. This specifically includes any requests issued to the District to opt out a child from any instruction or instructional materials based upon the first amendment of the U.S. Constitution (including, but not limited to, religious liberty rights) and / or the *Mahmoud, et al v. Taylor* case. It also includes any policy or procedures adopted by the District or modified by the District in response to the *Mahmoud, et al v. Taylor* case. Please also forward a copy of the minutes of the Board of Trustees where this issue was on the Board's agenda and any resolutions or other actions taken, if any, by the Board in response to this case. **If no such minutes on this topic**

**exists I request the District to advise that no records (minutes) exist on this specific topic / vote.**

2. Any Public Records Act requests to the District and the District's responses to those requests for records related to the *Mahmoud, et al v. Taylor* case.

If any document contains the name of any student or student's parent we ask that the District redact those names prior to disclosing the responsive documents.

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. 4<sup>th</sup> 278, 288. I note that my client's requests do NOT include any employee personnel files.

The timeframe for this request above is from June 1, 2025 to the present date.

These requests are for any 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. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5<sup>th</sup> 608.

As part of the District's response, we request confirmation that the private e-mail accounts and cellular telephones (private or District issued) of the Superintendent and District HQ staff and the members of the Board of Trustees have been searched for responsive documents.

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

My client is seeking these records in any 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. Given the contents of these requests, a compilation, extraction or programming should not be required to obtain responsive documents.

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. 5<sup>th</sup> 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.

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 exempted.

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 any and 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 6253.1 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 “C”**

**From:** [Heather Contreras](#)  
**To:** [Craig Alexander](#)  
**Subject:** Read: Public Records Act requests  
**Date:** Tuesday, October 14, 2025 3:42:06 PM

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Your message  
To: Heather Contreras  
Subject: Public Records Act requests  
Sent: 10/14/25, 12:25:15 PM PDT  
was read on 10/14/25, 3:41:58 PM PDT

## **EXHIBIT “D”**

***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](mailto:craig@craigalexanderlaw.com)*

**VIA US MAIL CERTIFIED RETURN RECEIPT**

November 13, 2025

Dr. Heather Contreras,  
Superintendent  
Eva Renteria,  
Executive Assistant,  
Pajaro Valley Unified School District  
294 Green Valley Road  
Watsonville, CA 95076

RE: California Public Records Act Requests

Dear Superintendent Contreras and Ms. Renteria,

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 (two letters) dated October 14, 2025. To date we have not received any response to either 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 ‘E’**

**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:

PATAJO VALLEY U.S.D,  
 294 GREEN VALLEY ROAD  
 WATSONVILLE, CA  
 95076



9590 9402 9115 4225 3269 78

Article Number (Transfer from service label)

7022 1670 0002 2955 7485

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *ME Healy*

- Agent
- Addressee

B. Received by (Printed Name)

*Healy*

C. Date of Delivery

*11/18*

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

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

USPS TRACKING#



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 9115 4225 3269 78

United States  
Postal Service

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

CRAIG ALEXANDER  
24681 LA PLAZA, SUITE 250  
DANA POINT, CA  
92629

