

# EXHIBIT C



## RECAP: AMERICA FIRST LEGAL IN REVIEW

THURSDAY, JULY 22, 2021

*“As you can see below, your support has allowed us to launch some of the most important legal battles for the future of the country — and we have already won several crucial legal victories against the Biden Administration’s unlawful conduct. Please donate today, in any amount you can,*

*to help us defeat illegal discrimination, fight the unconstitutional equity agenda, defend our sacred borders, and uphold America First principles in our courts of law. Help us save America for our children,”* AFL President Stephen Miller.

## VICTORIES

### **MAJOR LEGAL VICTORY: COURT GRANTS PRELIMINARY INJUNCTION AND CLASS CERTIFICATION IN USDA’S RACIALLY-BASED DEBT RELIEF PROGRAM**

AFL, on behalf of farmers and ranchers across the United States, including Texas Agriculture Commissioner Sid Miller, challenged the federal government’s racially discriminatory and unconstitutional loan-forgiveness program, which provides loan forgiveness up to 120% for farmers and ranchers based solely on the color of their skin. The Court’s decision to grant a preliminary injunction against this racially discriminatory program is a major win for every American citizen.

### **BIDEN ADMINISTRATION CAVES IN RESPONSE TO AFL LAWSUIT, WILL END UNCONSTITUTIONAL RACIAL PREFERENCES IN THE RESTAURANT REVITALIZATION FUND**

The Biden Administration told a federal court that it will no longer give preferential treatment to select racial groups when awarding relief under the Restaurant Revitalization Fund. It also told the court that it will work to undo any preferences that it illegally conferred on so-called “priority” racial group applicants during the first 21 days of the program. This is a major victory for equal rights under law and a repudiation of the odious and unconstitutional racial preferences that have consistently found their way into the Biden Administration’s COVID-relief efforts.

The Department of Justice told a federal court that the Biden Administration would accede to AFL’s demands and halt consideration of “prioritized” applicants until all previously filed applications have been fully processed.

## **FOLLOWING LEGAL PRESSURE FROM AFL, BIDEN WITHDRAWS CRITICAL RACE THEORY REQUIREMENT FROM EDUCATION RULE**

Following pressure from America First Legal, Education Secretary Miguel Cardona announced that the Department of Education (DOE) will withdraw its requirement that DOE grant recipients must implement the 1619 project (Critical Race Theory) into their curriculum.

## **DEFENDING SOVEREIGNTY AND BORDERS**

### **AFL FILES FOIAS WITH CBP, DHS REQUESTING INFORMATION ABOUT THE OUSTER OF BORDER PATROL CHIEF RODNEY SCOTT AND CBP DEPUTY COMMISSIONER ROBERT PEREZ**

America First Legal submitted Freedom of Information Act (FOIA) requests to U.S. Customs and Border Protection (CBP) and the Department of Homeland Security (DHS) requesting all records, communications, and documents relating to the ouster of Border Patrol Chief Rodney Scott and CBP Deputy Commissioner Robert Perez.

### **AFL DEMANDS RECORDS RELATING TO THE BIDEN ADMINISTRATION'S OPEN BORDER POLICIES SINCE TAKING OFFICE**

America First Legal submitted a Freedom of Information Act Request (FOIA) to the U.S. Department of Homeland Security requesting all records, communications, and documents related to a host of the Biden Administration's immigration policies. Those policies include: implementation of Executive Order 14010; the termination of the Migrant Protection Protocols Program; the failure to abide by the Title 42 program; the decision to implement catch-and-release for aliens at the border; resuming and expanding the Central American Minors Program; and others.

## **AFL FILES NEW FOIA SEEKING INFO REGARDING DHS' DECISION TO TERMINATE OFFICE THAT SERVED AMERICAN VICTIMS OF ILLEGAL ALIEN CRIME**

America First Legal has filed a new Freedom of Information Act (FOIA) request about the Biden Administration's ludicrous and deeply disturbing decision to terminate the VOICE office.

## **AFL, TEXAS ASK FEDERAL JUDGE TO IMMEDIATELY HALT BIDEN'S ILLEGAL CATCH-AND-RELEASE POLICIES AT THE BORDER**

Texas, with AFL serving as outside counsel, filed suit against the Biden Administration for failing to follow its own rules related to Title 42, and in the alternative, for failing to detain aliens who come from locations where communicable diseases of public health significance are prevalent. At the same time that the Biden Administration says that Americans need to be fully vaccinated in order to participate in ordinary activities without a mask, it has failed to follow its own rules that require the expulsion of aliens at the border—the overwhelming majority of whom have not been vaccinated and do not wear masks.

## **AMERICA FIRST LEGAL, SERVING AS OUTSIDE COUNSEL TO ATTORNEY GENERAL KEN PAXTON AND THE STATE OF TEXAS, FILES LAWSUIT AGAINST BIDEN ADMINISTRATION**

Acting as outside counsel for Texas Attorney General Ken Paxton, America First Legal (AFL) announced its formal and official participation in filing a lawsuit against the Biden Administration. The lawsuit seeks to require the Biden Administration to abide by federal law and protect Americans from the COVID-19 threat at the Southern Border. Texas seeks preliminary and permanent injunctive relief, as well as declaratory relief, requiring the Biden Administration to fully comply with the law, including the Administrative Procedure Act, and uphold its constitutional duty to ensure that the laws of the United States are faithfully executed. This means ending the indiscriminate practice of mass releasing potentially-infected illegal aliens into the State of Texas.

## FIGHTING THE “EQUITY” AGENDA

### DEMANDING MATERIALS FROM PENNSYLVANIA SCHOOL DISTRICT THAT REFUSES TO DISCLOSE TIES TO RADICAL “EDUCATION” CONSULTANTS PUSHING CRITICAL RACE THEORY IN THE CLASSROOM

America First Legal filed an open records request with the Tredyffrin-Easttown School District requesting all records, documents, and communications relating to the development and implementation of Critical Race Theory curriculum between the Pacific Education Group and the School District.

### AFL FILES FORMAL RESPONSE TO NASA’S QUEST TO INCORPORATE ILLEGAL RACE EQUITY SCHEMES INTO SPACE PROGRAM

As part of its continued efforts to combat the advance of “equity” initiatives across the federal government—America First Legal submitted a comment in response to the National Aerospace and Science Administration’s request for information regarding how to incorporate so-called “racial equity” into programs at NASA.

### AFL DEMANDS RECORDS ABOUT THE BIDEN ADMINISTRATION’S INITIATIVE ON ‘RACIAL EQUITY’ AT NASA

America First Legal submitted a Freedom of Information Act Request (FOIA) at the National Aeronautics and Space Administration (NASA) requesting all records, communications, and documents relating to the development or implementation of Executive Order 13985.

### AMERICA FIRST LEGAL SEEKS INFORMATION FROM THE DEPARTMENT OF EDUCATION ABOUT USE OF COVID EDUCATION FUNDS TO FORCE CRITICAL RACE THEORY ONTO U.S. SCHOOLCHILDREN

America First Legal filed a Freedom of Information Act request with the Department of Education regarding its efforts to implement Critical Race Theory throughout the programs it administers, including its proposed use of covid relief funds to subsidize “Antiracist Therapy” in our nation’s schools. So-called Antiracist Therapy is a form of Critical Race Theory Indoctrination that teaches young children to judge each other based on race.

## **AMERICA FIRST LEGAL BLASTS BIDEN ADMIN FOR SEEKING TO INDOCTRINATE CHILDREN WITH POISONOUS CRITICAL RACE THEORY**

America First Legal (AFL) submitted a scathing formal comment to the Department of Education regarding its proposed rule entitled “Proposed Priorities: American History and Civics Education,” warning Secretary of Education Miguel Cardona about the insidious impact that his Department’s Proposed Priority 1 would have upon America’s schoolchildren and students. The proposed priority, specifically titled “Projects That Incorporate Racially, Ethnically, Culturally, and Linguistically Diverse Perspectives into Teaching and Learning,” is suffused with ideas of the widely discredited academic movement known as “critical race theory.”

## **BIG TECH & FREE SPEECH**

### **FOLLOWING DISTURBING ADMISSION BY BIDEN WHITE HOUSE, AFL FOIAS THE BIDEN ADMINISTRATION ABOUT ITS DIRECTIONS TO SOCIAL MEDIA COMPANIES TO CENSOR AMERICANS**

America First Legal filed Freedom of Information Act (FOIA) requests with the Department of Health and Human Services, the Centers for Disease Control and Prevention, the Food and Drug Administration, and the National Institutes of Health requesting all documents, records, and communications relating to the Biden Administration’s decision to direct big tech companies to censor speech on their platforms, abridging the First Amendment rights of the American people.

White House Press Secretary Jen Psaki admitted that the White House is working with Facebook to flag “problematic posts” of Americans. The American people have a right to know who from the

government is saying what, to whom, and for what reasons. A social media company taking down content with which it disagrees is a troubling practice, but a social media company doing so at the behest of the United States appears to be a violation of the First Amendment. Americans might expect such direct coordination between the government and big corporations in Cuba, or in China, but not in the United States.

## OVERSIGHT

### **AFL REQUESTS RECORDS RELATED TO HATCH ACT INVESTIGATIONS DURING THE TRUMP ADMIN**

America First Legal sent a Freedom of Information Act (FOIA) request to the Office of Special Counsel (OSC) requesting all records, communications, and documents referring or relating to Hatch Act investigations during the Trump Administration.

### **AFL DEMANDS RECORDS FROM DOJ ABOUT THE BIDEN ADMINISTRATION'S VETTING OF JUDICIAL NOMINEES AND AGREEMENTS WITH THE SENATE COMMITTEE ON THE JUDICIARY**

America First Legal submitted a Freedom of Information Act (FOIA) request to the Department of Justice requesting all documents, communications, and records relating to the vetting and appointment of the Biden Administration's judicial nominees; who have been confirmed at a rapid pace by the United States Senate.

### **AMERICA FIRST LEGAL FILES FOIA REQUEST ON BIDEN ADMIN'S ORDER TO END COVID ORIGIN INVESTIGATION**

America First Legal filed a Freedom of Information Act request to the State Department seeking information related to the Biden Administration's termination of the investigation into the origins of the coronavirus.



## **AMERICA FIRST LEGAL SEEKS INFORMATION ABOUT BIDEN ADMINISTRATION'S TARGETING OF CONSERVATIVE SERVICEMEMBERS**

America First Legal filed a Freedom of Information Act request with the Department of Defense seeking information on the Biden Administration's potential monitoring of conservative servicemembers across the Department of Defense. In just the past couple of months, several concerning instances of politicization have been brought to light.

## **AMERICA FIRST LEGAL FILES FOIA REQUEST SEEKING DATA ON THE BIDEN ADMINISTRATION'S ADMINISTRATIVE ABOLITION OF ICE'S MISSION**

America First Legal filed a Freedom of Information Act request seeking all weekly enforcement reports by U.S. Immigration and Customs Enforcement (ICE). The effort is part of AFL's effort in promoting government transparency and accountability.

## **ONGOING BATTLES AND OTHER HIGHLIGHTS**

### **AFL TAKES ON OBAMACARE IN FEDERAL COURT, JOINS AS CO-COUNSEL IN LAWSUIT CHALLENGING SECTION 2713 OF THE AFFORDABLE CARE ACT**

America First Legal has joined a lawsuit challenging a key provision of the Affordable Care Act, also known as "Obamacare." The lawsuit seeks to enjoin the continued enforcement of section 2713 of the Affordable Care Act, which forces private insurers to cover "preventive care" without any cost-sharing arrangements such as copays or deductibles.

### **TEXAS SUPREME COURT ASKS FOR MERITS BRIEFING IN LAWSUIT OVER SAN ANTONIO'S UNCONSTITUTIONAL CHICK-FIL-A BAN**

The Texas Supreme Court asked for merits briefing in a lawsuit brought against the city of San Antonio over its decision to ban Chick-fil-A from its airport. The city council previously voted to ban Chick-fil-A in response to pressure from radical activists, who wanted to punish the company for donating money to Christian organizations such as the Salvation Army and the Fellowship of Christian Athletes. Each of these organizations adheres to Christian teaching that marriage can exist only between one man and one woman.

America First Legal urged the Texas Supreme Court to review the case and is pleased that the Court has called for a merits briefing.

### **AFL DEFENDS RELIGIOUS FREEDOM, JOINS CASE AGAINST THE EEOC'S ILLEGAL EXECUTIVE ACTION ON TRANSGENDER POLICY**

America First Legal has formally joined a lawsuit in the U.S. District Court for the Northern District of Texas against the Equal Employment Opportunity Commission's unconstitutional interpretation of Title VII. Their guidance says that Title VII prohibits all employment discrimination on account of sexual orientation or gender identity—with no religious exemption. This violates the First Amendment and the Religious Freedom Restoration Act.

### **AFL FILES A MOTION FOR A PRELIMINARY INJUNCTION AND CLASS CERTIFICATION IN USDA RACIALLY-BASED DEBT RELIEF PROGRAM**

America First Legal filed an amended complaint, a motion for class certification, and a motion for a preliminary injunction in its case involving the federal government's racist and unconstitutional Department of Agriculture loan forgiveness program—which provides loan forgiveness up to 120% for farmers and ranchers based solely on the color of their skin.

### **AFL SECURES PRELIMINARY INJUNCTION FOR CLIENTS VICTIMIZED BY BIDEN RACE DISCRIMINATION**

The Northern District of Texas granted America First Legal's clients a preliminary injunction against the discriminatory administration of the Small Business Administration's Restaurant

Revitalization Fund. The Small Business Administration must now process out clients' applications in accordance with a "race neutral, sex-neutral 'first come, first served' policy."

### **AFL FILES FOR PRELIMINARY INJUNCTION AGAINST BIDEN ADMINISTRATION'S ILLEGAL RACE DISCRIMINATION**

AFL has filed a proposed class action lawsuit and a motion for a preliminary injunction on behalf of several restauranteurs in Texas and Pennsylvania who filed an application for COVID-19 restaurant relief, but whose applications were sent to the back of the line for access to a limited pool of money because they failed to satisfy the illegal scheme of race preferences, priorities, and exclusions established by the Biden Administration.

### **AMERICA FIRST LEGAL JOINS LOUISIANA'S LEGAL TEAM IN LAWSUIT AGAINST BIDEN'S ABOLISH ICE MEMOS**

America First Legal signed a pro bono services agreement to provide legal support, consultation, and strategy to the State of Louisiana in its lawsuit against the Biden Administration's illegal and unconstitutional memoranda that constitute a backdoor attempt to abolish ICE.

### **AMERICA FIRST LEGAL SECURES TEMPORARY RESTRAINING ORDER FOR CLIENT AGAINST BIDEN ADMINISTRATION**

The U.S. District Court for the Northern District of Texas granted a temporary restraining order against the Biden Administration's Small Business Administration. America First Legal asked for a Temporary Restraining Order seeking to protect its client—a restaurant owner in Texas who lost revenue due to the decrease in business caused by COVID-19—from racial discrimination in the Small Business Administration's Restaurant Revitalization Fund.

### **AMERICA FIRST LEGAL CONDEMNS BIDEN ADMINISTRATION'S ABORTION AGENDA IN FORMAL REGULATORY COMMENT**

America First Legal submitted a comment to the Department of Health and Human Services objecting to the Biden Administration’s proposed radical abortion mandate. The rule would require all Title X programs to provide abortion referral services to their clients, in violation of law, and contrary to the beliefs of many providers of Title X programs across the country.

### **AMERICA FIRST LEGAL FILES MOTION FOR TEMPORARY RESTRAINING ORDER TO HALT THE BIDEN ADMINISTRATION’S RACIAL DISCRIMINATION AGAINST BAR AND RESTAURANT OWNERS**

On behalf of their courageous client, America First Legal filed a motion for a Temporary Restraining order (TRO) to immediately stop the Biden Administration from illegally deciding which restaurants receive covid relief funds based upon their race. This follows the filing of a historic lawsuit that seeks to prevent the Biden Administration from improperly and unlawfully discriminating against AFL’s client.

### **AMERICA FIRST LEGAL FILES NEW LAWSUIT AGAINST BIDEN ADMINISTRATION FOR ILLEGAL RACE DISCRIMINATION AGAINST BAR AND RESTAURANT OWNERS**

America First Legal has filed a historic lawsuit to block the Biden Administration’s illegal racial discrimination in administering COVID relief policies. Congress created the Restaurant Revitalization Fund in the last stimulus bill. The Small Business Administration has published new guidelines for the Restaurant Revitalization Fund, creating a “priority” group that will be first in line for a limited pool of relief money. Entire classes of Americans are formally excluded from the “priority” group if they do not meet exacting racial criteria. This ensures that many American bar and restaurant owners will suffer deep financial losses, potentially even the loss of their businesses, because they were excluded by the government based solely on race.

### **AMERICA FIRST LEGAL FILES BRIEF IN TEXAS SUPREME COURT TO REMEDY SAN ANTONIO’S CANCELLING OF CHICK-FIL-A**

America First Legal filed a brief in the Supreme Court of Texas seeking to remedy the City of San Antonio’s decision to refuse government contracts to Chick-fil-A based on the city’s perception of Chick-fil-A’s religious views and company donations to organizations that support a traditional understanding of marriage—an outrageous violation of the First Amendment.

### **AMERICA FIRST LEGAL SUES BIDEN ADMIN TO END RACIAL DISCRIMINATION AGAINST FARMERS AND RANCHERS**

America First Legal (AFL) filed a lawsuit in the United States District Court for the Northern District of Texas to stop the Biden Administration from administering a program created by Congress in the American Rescue Plan Act of 2021 that discriminates against American citizen farmers and ranchers based upon their race. Specifically, Sections 1005 and 1006 of the American Rescue Plan Act of 2021 provide benefits to farmers and ranchers, but excludes many potential beneficiaries based solely upon their ethnicity or race.

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Follow us on social media to get the latest updates on America First Legal’s fight to protect your constitutional rights!

[Twitter](#), [Facebook](#), [GETTR](#), [Parler](#)



RESPONSE TO WRITTEN REQUEST

I. Description of Record Requested and Name of Requestor

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II. Date of Response (Within 5 days of date of request)

Date request was granted \_\_\_\_\_

OR

Date form with Section III completed sent to requestor \_\_\_\_\_

III. Basis for Review (Circle all applicable reasons and fill in additional information in space provided)

- I. Request requires redaction of public record
2. Request for access requires retrieval of record stored in remote location (identify location)
3. Timely response cannot be made due to bona fide and specified staffing limitations (state specific staffing limitations \_\_\_\_\_)
4. Legal review required to determine whether record is a public record
5. Requestor failed to comply with Policy 1123 in the following respect:

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6. Requestor refused to pay applicable fees. Amount owed: \_\_\_\_\_

7. The extent or nature of the request precludes a response within the required time period.

IV. Basis for Denial of Request

Request denied by:

Name \_\_\_\_\_

Title \_\_\_\_\_

Business Telephone Number: \_\_\_\_\_

Business Address: \_\_\_\_\_

\_\_\_\_\_

Date of Denial: \_\_\_\_\_

Specific reasons for denial including citation of supporting legal authority

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Signature of Opens Records Officer

V. Appeal

If requestor chooses to appeal denial of access, the requestor may appeal to the State’s Office of Open Records by filing exceptions within fifteen business days of the mailing date of the date set forth in IV or within fifteen business days of deemed denial. The exceptions shall state grounds upon which the requestor asserts that the record is a public record and shall address any grounds stated by the School District for delaying or denying the request.

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Signature of Opens Records Officer





July 13, 2021

**VIA E-MAIL**

ATTN: Arthur J. McDonnell, Open Records Officer  
Tredyffrin-Easttown School District  
West Valley Business Center  
940 West Valley Road, Suite 1700  
Wayne, PA 19087

**Written Request for Access to School District Records**

Dear Mr. McDonnell:

In 2018, Tredyffrin-Easttown School District's ("School District") began a partnership with Pacific Education Group. Upon information and belief, under this partnership, Pacific Education Group is and has been designing critical race theory-based curriculum and instructional materials, and/or reviewing and modifying existing curriculum and/or instructional materials to reflect critical race theory concepts and theories, for the School District.

Critical race theory as applied to education holds that in the United States the education system is inherently racist and exists to create and maintain social, economic, and political inequalities between whites and nonwhites, especially African Americans. The theory's proponents often seek to "problematize whiteness" or "deconstruct whiteness." Proponents of CRT in education have argued that a focus on

finding the right answer to a math problem is racist<sup>1</sup>, and that students must be taught to focus on race and power structures that allegedly benefit white people at the expense of all others.<sup>2</sup>

Pacific Education Group promotes one of the most extreme versions of critical race theory, an already radical ideology. For example, Pacific Education Group believes:

- The root of the current wealth gap between black and white families was “the transfer of wealth from Southern slaveholding families to their children.”<sup>3</sup>
- “White privilege [is] an invisible force that white people need to recognize.”<sup>4</sup>
- White teachers “are worse for black students” and racists white teachers are the cause of differences in academy performances between black and white students.<sup>5</sup>

The School District has refused to disclose to the public any details about its relationship with Pacific Education Group and the curriculum Pacific Education Group is creating for the School District. At a board meeting on June 15, 2021, the

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<sup>1</sup> John Hinderaker, *Why Math is Racist*, CLARION NEWS, <https://clarion.causeaction.com/2021/02/13/why-math-is-racist/> (Feb. 13, 2021).

<sup>2</sup> Brian Duignan, *Critical Race Theory*, ENCYCLOPEDIA BRITANNICA (Apr. 2, 2021) <https://www.britannica.com/topic/critical-race-theory> (last visited July 12, 2021).

<sup>3</sup>Brentin Mock, *White Americans’ Hold on Wealth is Old, Deep, and Nearly Unshakeable*, COURAGEOUS CONVERSATION, <https://courageousconversation.com/white-americans-hold-on-wealth-is-old-deep-and-nearly-unshakeable/> (Sept. 3, 2019)

<sup>4</sup> Cory Collins, *What is White Privilege, Really?*, <https://courageousconversation.com/what-is-white-privilege-really/> (Sept. 1, 2018).

<sup>5</sup> Andre Perry, *What’s Wrong With White Teachers?*, <https://courageousconversation.com/whats-wrong-with-white-teachers/> ((May 1, 2017).

School Board stated that materials created by Pacific Education Group could not be disclosed because of “copyright concerns.” The School Board also suggested that it executed a non-disclosure agreement with Pacific Education Group prohibiting disclosure. This violates state and federal law.

As you know, under Pupil Rights Amendment (PPRA), 20 U.S.C. § 1232h, and its implementing regulations at 34 CFR Part 98, parents have a right to inspect any instruction material used as part of their child’s education curriculum.<sup>6</sup> Likewise, under state law, parents have a right to review the curriculum of the School District. 25 P.S. § 5-510.2; 22 Pa Code § 4.4(d)(1). The School District cannot circumvent these requirements by claiming copyright concerns and by using nondisclosure agreements.

America First Legal requests, under the Right to Know Law, 65 P.S. § 67.101, et. seq., all “records,” as defined 65 P.S. § 67.102, of, concerning, regarding, and/or relating to the School District’s “partnership” with Pacific Education Group<sup>7</sup>. These records are known to be in the care, custody, and control of the School District based on the School District voluntary public disclosures, <https://www.tesd.net/cms/lib/PA01001259/Centricity/Domain/1882/PEG%20Update.pdf>, and which are otherwise required under the Pennsylvania School Code of 1949,

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<sup>6</sup> “All instructional materials, including teacher's manuals, films, tapes, or other supplementary material which will be used in connection with any survey, analysis, or evaluation as part of any applicable program shall be available for inspection by the parents or guardians of the children.” 20 U.S.C. § 1232h(a).

<sup>7</sup> The Right to Know Law is “designed to promote access to official government information in order to prohibit secrets, scrutinize the actions of public officials, and make public officials accountable for their actions.” *Borough of Pottstown v. Suber-Aponte*, 202 A.3d 173, 179–80 (Pa. Commw. Ct. 2019)(quoting *Bowling v. Office of Open Records*, 990 A.2d 813, 824 (Pa. Cmwlth. 2010)(en banc), *aff'd*, 621 Pa. 133, 75 A.3d 453 (2013).

24 P.S. § 1-101, et. seq. These records should include, but are not limited to, the following.

1. All records of contracts, agreements, or understandings by and between the School District and Pacific Education Group.
2. All nondisclosure agreements by and between the School District and Pacific Education Group.
3. All invoices submitted by Pacific Education Group to the School District for payment from 2018 to the present.
4. All records prepared by Pacific Education Group for the School District between 2018 and the present, including, without limitation, any communications, slides, documents, or training materials, distributed or shared with any employee of the School District, whether under the Pacific Education Group's "Courageous Conversations Protocol" or otherwise.
5. Any "Continuing Courageous Conversations Toolkits" prepared by Pacific Education Group for or used by or pursuant to any agreement with the School District between 2018 and the present.
6. Any curriculum or "instructional material(s)" as defined at 20 U.S.C. § 1232h(c)(6), prepared, modified, or reviewed by Pacific Education Group under or pursuant to any contract, agreement, request, or understanding by or with the School District from 2018 to the present.

7. All records demonstrating the School District's compliance with 24 P.S. § 16-1605(a) for the 2020-21 school year.
8. All records of and/or relating to the locally developed assessment for grades 7 through 12 administered under 24 P.S. § 16-1605.1(a)(1) for the 2020-21 school year.
9. All records of, relating to, and/or regarding the School District's compliance with the Protection of Pupil Rights Amendment (PPRA), 20 U.S.C. § 1232h for school years 2017 – 2021.
10. All records, including but not limited to emails, correspondence, instructional material, teacher training material, lecture material, memoranda, and/or hand written notes (a) referencing or regarding the Pacific Education Group, or products or services provided by the Pacific Education Group, and the PPRA; (b) the District's general PPRA notice used to notify parents of their rights during the 2017 - 2018, 2018-2019, 2019-2020, and 2020-2021 school years; (c) the specific notification, if any, provided by the District or any school within the District about parents' rights under the PPRA with respect to the Pacific Education Group and/or instructional material from, added, affected, influenced, or changed as a result, in whole or in part, of any training, product, or service provided by the Pacific Education Group during the 2017 - 2018, 2018-2019, 2019-2020, and 2020-2021 school years; (d) the District's consultations during the 2017-2018, 2018-2019, 2019-2020, and 2020-

2021 school years regarding the right of a parent of a student to inspect, upon the request of the parent, any instructional material from, added, affected, influenced, or changed as a result, in whole or in part, of any training, product, or service provided by the Pacific Education Group during the 2017 - 2018, 2018-2019, 2019-2020, and 2020-2021 school years used as part of the educational curriculum for the student; (e) the applicable procedures for granting a request by a parent for reasonable access to instructional material within a reasonable period of time after the request is received with respect to any product or service provided by the Pacific Education Group relating to or affecting instructional material during the 2017 - 2018, 2018-2019, 2019-2020, and 2020-2021 school years; and (e) the District's consultation with parents required under 20 U.S.C. § 1232h(c)(1) and (f) during the 2017 - 2018, 2018-2019, 2019-2020, and 2020-2021 school years.

11. All records of, concerning, or regarding the (a) identities of all School District teachers, guidance counselors, and administrators who attended or reviewed any training, seminar, or other programing or presentation, whether in-person or virtually, by or with any Pacific Education Group employee or representative; and (b) the identities of all Pacific Education Group employees or representatives who have had any contact with any School District teacher or other employee, whether as a trainer, facilitator, lecturer, or otherwise.