

April 16, 2004

Jennifer Sheets, President
State Board of Education of Ohio
Ohio Department of Education Building
25 South Front Street, 7th Floor
Columbus, Ohio 43215-4183

SENT VIA U.S. MAIL

Dear Board President Sheets:

Pursuant to §149.43 of the Ohio Revised Code, I hereby request copies of any and all documents having to do with the Ohio Board of Education's recent adoption of the "Critical Analysis of Evolution" Lesson Plan ("CAE Plan").

These documents should include, but not be limited to, the following:

- * Copies of any and all official minutes from any and all Board meetings, committee meetings, subcommittee meetings and any other similar official gathering(s) of Board members where the CAE Plan was discussed.
- * Copies of any and all partial and whole drafts of the CAE Plan that preceded the final version of said plan.
- * Copies of any and all correspondence and documents – including e-mails - from Board member to Board member relating to the consideration of & adoption of the CAE Plan.
- * Copies of any and all correspondence and documents – including e-mails - between any and all Ohio School Board members and any and all representatives of the following organizations: Ohio Citizens for Science, Science Excellence for All Ohioans, the American Family Association of Ohio, National Academy of Science, National Center for Science Education, the Discovery Institute, Access Research Network and National Association for Objectivity in Science.
- * Copies of any and all correspondence and documents – including e-mails – between any and all Ohio School Board members and the following individuals: Jonathon Wells, Michael Behe, Michael Denton, Benjamin Wiker, Richard Milton, Melanie Elsey, Daniel Ely, Robert Lattimer, Thomas Marshall, Glen Needham, Timothy Seeley and Patrick Young.

* Copies of any and all documents relating to the selection of members for the Science Academic Content Standards Advisory Committee and Writing Team (“Team”) for the CAE Plan. These documents should include, but not necessarily be limited to, the following:

- * Any and all documents used to solicit applicants and nominees for the Team.

- * Any and all documents submitted by all applicants and nominees for the Team.

- * Any and all documents that reflect what criteria were used to select the members of the Team.

- * Any and all documents that reflect who had the authority to select members of the Team.

- * Any and all written recommendations and any other documents generated by the Team with regard to the CAE Plan.

* Copies of any and all documents relating to the selection of members for the Curriculum Model Writing Team (“CMW Team”) for the CAE Plan. These documents should include, but not necessarily be limited to, the following:

- * Any and all documents used to solicit applicants and nominees for the CMW Team.

- * Any and all documents submitted by all applicants and nominees for the CMW Team.

- * Any and all documents that reflect what criteria were used to select the members of the CMW Team.

- * Any and all documents that reflect who had the authority to select members of the CMW Team.

- * Any and all written recommendations and any other documents generated by the CMW Team with regard to the CAE Plan.

I understand that I responsible for the costs of copying and shipping these documents. An invoice can be sent along with the documents or you may bill me in advance.

If there are any questions pertaining to this request, please contact me using the contact information provided.

I look forward to receiving these documents at your earliest convenience.

Sincerely,

Gary Daniels
Litigation Coordinator