

# FREEDOM FROM RELIGION *foundation*

P.O. BOX 750 • MADISON, WI 53701 • (608) 256-8900 • WWW.FFRF.ORG

October 6, 2017

SENT VIA U.S. MAIL AND EMAIL TO: [jailerlcdc@windstream.net](mailto:jailerlcdc@windstream.net)

Jamie Mosley  
Laurel County Jailer  
Laurel County Correctional Center  
204 W. 4th St.  
London, KY 40741

Re: Open Records Request

Dear Mr. Mosley:

Pursuant to Kentucky's Open Records Act (KRS §§61.870-61.884), I request copies of the following records concerning the "Night of Prayer" held at Laurel County Correctional Center on August 29, 2017:

- 1.) **All records** related to the organization and/or planning of the Night of Prayer. This request includes: (a) any LCCC policies regarding jail events involving the public, and (b) any communications between LCCC employees or between LCCC employees and persons not employed by LCCC regarding the Night of Prayer including, but not limited to: memos, emails, fliers, signs, social media posts, notes, and meeting minutes.
- 2.) **All records** related to employee staffing at LCCC during the "Night of Prayer." This request includes: (a) any LCCC policy regarding staffing during jail events involving the public, and (b) logbooks, timecards, staff assignments, payment receipts, expense reports, invoices, and any communications related to employee staffing including, but not limited to: memos, emails, fliers, signs, social media posts, notes, and meeting minutes.
- 3.) **All records** related to inmate attendance at the "Night of Prayer," including, but not limited to: (a) any LCCC policies regarding releasing inmates from their cells, (b) any communications regarding inmate attendance at the "Night of Prayer," including, but not limited to: memos, emails, social media posts, notes, and meeting minutes.
- 4.) **All advertisements or promotional material** related to the "Night of Prayer," including drafts of the materials.

I further request copies of the following records for the period of January 1, 2015 to the present:

- 1.) (a) **any contracts or other agreements** with any persons or organizations to provide substance abuse programming at LCCC;
  - (b) **any communications, including emails**, to or from LCCC employees regarding persons or organizations providing substance abuse programming at LCCC;
  - (c) **any LCCC policies or procedures** for creation or dissolution of any substance abuse program.
- 2.) (a) **any contracts or other agreements** with any persons or organizations to provide religious programming at LCCC;
  - (b) **any communications, including emails**, to or from LCCC employees regarding persons or organizations providing religious programming at LCCC;
  - (c) **any LCCC policies or procedures** for creation or dissolution of any religious program.

Please respond as soon as possible to this request. If you choose to deny this request, please respond with a written explanation of the denial including any references to statutory exemptions or other case law upon which you rely. If your agency does not maintain these public records, please forward this request and let me know the proper custodians of these records.

If I can provide any clarification that will help expedite your attention to my request, please contact me at 608-256-8900. If any records are available in electronic format, they may be emailed to [colin@ffrf.org](mailto:colin@ffrf.org). Thank you for your time and attention to this matter.

Sincerely,



Andrew Seidel  
Constitutional Attorney, Director of Strategic Response  
Freedom From Religion Foundation