

# FREEDOM FROM RELIGION *foundation*

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

October 23, 2019

SENT VIA MAIL and EMAIL

[governor@ky.gov](mailto:governor@ky.gov)

The Honorable Matt Bevin  
c/o Records Custodian  
Office of the Governor  
700 Capitol Avenue, Ste. 100  
Frankfort, KY 40601

Re: Open Records Request

Dear Records Custodian for Governor Bevin:

Pursuant to Kentucky's Open Records Act (KRS §§61.870-61.884), I request copies of the following records related to a recent "spiritual event." For the purposes of this record request, the "Event" refers to the meeting of Gov. Matt Bevin, Ralph Alvarado, and several pastors or ministers, possibly including Richard Sams and Thomas Hall, at the Governor's Mansion on Monday, October 21, 2019:

1. **All records** related to the organization and/or planning of the Event. This request includes: (a) any state policies regarding jail events involving the public, and (b) any communications between state employees or between state employees and persons not employed by the state regarding the Event including, but not limited to: memos, emails, fliers, signs, social media posts, notes, and meeting minutes.
2. **All invitations, advertisements, or promotional material** related to the Event, including drafts of the materials.
3. **All responses** to those invitations.
4. **All records** related to employee staffing of the Event, including 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.

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 (preferred), they may be emailed to [wsteffen@ffrf.org](mailto:wsteffen@ffrf.org). Thank you for your time and attention to this matter.

When our last request was denied, we took the matter to the Kentucky Attorney General and successfully received an official opinion overturning the denial and allowing my organization to bring a lawsuit.

As you probably know, hosting campaign events using state resources is illegal. As you likely also know, hosting religious events using state resources is unconstitutional. We will be examining the records for a violation of each rule.

Sincerely,



Andrew L. Seidel  
Constitutional Attorney  
Director of Strategic Response

ALS:wcs