FREEDOM FROM RELIGION foundation

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

July 18, 2019

SENT VIA U.S. MAIL & EMAIL: RCClerk@racinecounty.com

Wendy M. Christensen Racine County Clerk 730 Wisconsin Ave, 1st Floor Racine, WI 53403

Re: OPEN RECORDS REQUEST

Dear Ms. Christensen:

I represent the Freedom From Religion Foundation, a Wisconsin-based national nonprofit organization with more than 31,000 members across the country, including more than 1,400 in Wisconsin. Our purposes are to protect the constitutional principle of separation between church and state, and to educate the public on matters relating to nontheism. We understand that Racine County's 2019 budget included \$50,000 awarded to Youth for Christ, a Christian ministry, as part of the County's Cultural and Community Services program. We are seeking records to learn more about this grant and to ensure that County taxpayer funds are not being used to advance a ministry's religious message.

Pursuant to Wis. Stat. §§19.31–19.39, I request a copy of the following since January 1, 2017:

- 1) All contracts or other agreements involving any County fund allocations, including grants, to which Youth for Christ is a party;
- 2) All applications or similar records regarding requests for County fund allocations, including grants, from Youth for Christ;
- 3) All applicable policies, guidelines, or similar documents regarding the use of County funds for religious purposes; and
- 4) All e-mails to or from any Racine County Board member, or Jonathan Delagrave, that include the search terms "Youth for Christ" or "YFC."

The law requires you to respond to this request "as soon as practicable and without delay."

Please be aware that under Wisconsin law, there is a "presumption of complete public access consistent with the conduct of government business. The denial of access generally is contrary to the public interest and only in exceptional cases can access be denied." See Wis. Stat. §19.31.

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 any of these records are available through electronic media (preferred), they may be emailed to **ryan@ffrf.org**. If I can provide any clarification that will help expedite your attention to my request, please contact me at 608-256-8900. I appreciate your time and attention to this request.

Sincerely,

Ryan D. Jayne Staff Attorney

RDJ:rjs