

# FREEDOM FROM RELIGION *foundation*

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June 14, 2011

SENT VIA MAIL AND EMAIL  
(mmyers@southbend.in.gov)

Mayor Stephen J. Luecke  
Office of the Mayor  
227 West Jefferson Blvd., Suite 1400 N  
South Bend, IN 46601

Re: Open Records Request Regarding Subsidizing a Private Religious  
Organization through Bill 27-11

Dear Mayor Luecke,

I am writing on behalf of concerned citizens and South Bend members of the Freedom From Religion Foundation (FFRF) to request City records. FFRF is a national nonprofit organization with over 16,500 members across the country including members in South Bend. Our purpose is to protect the constitutional principle of separation between state and church.

Pursuant to the Indiana Access to Public Records Act (IC 5-14-3), I hereby request a copy of the following records:

- 1) Any correspondence (including emails, letters, phone memos, etc.) sent or received by Mayor Stephen J. Luecke or the Office of the Mayor relating to the proposed acquisition of the Family Dollar store in the East Bank Phase I Redevelopment Area for St. Joseph's High School.
- 2) Any correspondence (including emails, letters, phone memos, etc.) exchanged between Mayor Stephen J. Luecke or the Office of the Mayor and staff or representatives of St. Joseph's High School.
- 3) Any other records retained by the Office of the Mayor relating to the proposed acquisition of the Family Dollar store and proposed gift to St. Joseph's High School. This includes office memos, funding plans, alternative proposals, etc.

According to the statute, you have 7 days from receipt to respond to this request. If you choose to deny the request, then you are required to respond in writing and

state the statutory exception authorizing the withholding of all or part of the public record and the name and title or position of the person responsible for the denial.

If any of these records are available through electronic media, they may be e-mailed to [patrick@ffrf.org](mailto:patrick@ffrf.org). If I can provide any clarification that will help expedite your attention to my request, please contact me at 608-256-8900.

Sincerely,



Patrick C. Elliott  
Staff Attorney