

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANACIVIL
DISTRICT COURTAMERICAN FEDERATION OF TEACHERS 527
UNITED TEACHERS OF NEW ORLEANS

CIVIL ACTION NO. 2026-07757

Plaintiff

SECTION: N-13

V.

LYCÉE FRANÇAIS
INTERNATIONAL DE LA LOUISIANE

AND

DR. CHASE MCLAURIN IN HIS OFFICIAL
CAPACITY AS CUSTODIAN OF RECORDS

JUDGE SHERYL HOWARD

Defendants

FILED: _____

DEPUTY CLERK**AMENDED PETITION FOR WRIT OF MANDAMUS
PURSUANT TO THE LOUISIANA PUBLIC RECORDS ACT**

NOW INTO COURT, comes Plaintiff, AMERICAN FEDERATION OF TEACHERS 527 UNITED TEACHERS OF NEW ORLEANS, and pursuant to La. C.C.P. Arts. 1151, 1153, files this Amended Petition to add and expand upon facts, and clarify issues of law in its Original Petition. No Answer has been served, which entitles Plaintiff to amend its Petition as of right. La. C.C.P. art. 1151. Further, consent of the parties and/or contradictory hearing is not required pursuant to La C.C.P. art. 1155 as the amended petition does not assert any additional damages, causes of action, or defenses.

Although this action must be tried by preference and in a summary manner under La. R.S. 44:35(C), Plaintiff seeks to conduct limited discovery, including discovery attached hereto, before the hearing pursuant to La. C.C.P. art. 2596. Discovery may occur within a mandamus proceeding and does not convert the action into an ordinary proceeding. *Washington v. Cannizzaro*, 2018-0125, pp. 5–6 (La. App. 4 Cir. 11/7/18), 259 So. 3d 421.

INTRODUCTION

The AMERICAN FEDERATION OF TEACHERS 527 UNITED TEACHERS OF NEW ORLEANS (UTNO) is a non-profit labor organization in New Orleans, with a membership of teachers, paraprofessionals, and non-managerial school staff. UTNO seeks a writ of mandamus, directing Dr. Chase McLaurin in his official capacity as custodian of records for Lycée Français International de la Louisiane, to immediately produce or make available, all requested public records described herein, and improperly withheld from UTNO under the Louisiana Public Records Act. In addition, Petitioner seeks penalties, attorney's fees and costs under the Louisiana Public Records Act.

Defendants' actions are not isolated. Over the course of the past 12 months, Defendants failed to produce readily available electronic records, including those referenced and discussed

by board members during a finance committee meeting held on November 18, 2025. Despite being maintained in electronic form, when, more than a month later, the records finally became available, Defendants assessed a charge of \$19.00 for the production of a single pdf file. UTNO's effort to challenge the reasonableness of the production fee went unanswered, and UTNO did not obtain the requested records.¹

UTNO made the public records requests for the records at issue in this petition, following the March 2026 meeting of Lycée Français International de la Louisiane's board of directors. During a presentation on the school's expenditures and finances, significant questions arose for UTNO regarding the health of the operating budget. To better understand these issues, UTNO submitted the aforementioned public records requests. Having been unable to obtain access to the records sought, UTNO now brings this action pursuant to the Louisiana Public Records Act and, in support thereof, represents as follows:

PARTIES

1.

Plaintiff is American Federation of Teachers 527 United Teachers of New Orleans (UTNO) with its domicile and principal place of business in Orleans Parish, State of Louisiana.

2.

Defendant Lycée Français International de la Louisiane (Lycée) is a public body as defined by the Louisiana Public Records Act and a public charter school. Its registered principal place of business is 1601 Leonidas Street, New Orleans, La 70118. The school also operates a campus at the same address. La. R.S. 44:1(A)(1).

3.

Defendant Dr. Chase McLaurin is the Superintendent of Lycée Français International de la Louisiane and is its custodian of records under the Louisiana Public Records Act. La. R.S.44:1 *et seq.*

JURISDICTION AND VENUE

4.

Pursuant to La. R.S. 4435 (A) and (B), this Court has jurisdiction over this proceeding. and jurisdiction to issue a writ of mandamus. Venue is proper in this Court as the office of the custodian of records is located in Orleans Parish. La. R.S.44:35(A).

¹ Defendants' failure to comply with the Louisiana Public Records Act is consistent with a broader pattern of disregarding laws that govern public access to records. Most recently, following an investigation, the United States Department of Labor's Wage and Hour Division determined that Defendants failed to make federally required Labor Condition Application records available for public examination, in violation of 20 C.F.R. § 655.760(a).

STATEMENT OF FACTS

5.

Dr. Chase McLaurin is the custodian of records for Lycée Français International de la Louisiane.

6.

At all relevant times described herein, UTNO staff member, Margot Marks, a person of the majority, acting in the course and scope of her employment, made the public records requests described herein.

7.

On March 19, 2026, UTNO submitted a public records request under the Louisiana Public Records Act, La. R.S. 44:1 *et seq.* for records described in *Exhibit A*, under the title Codofil Adams and Reese:

All communications with the firm of Adams & Reese with any of the following people affiliated with The Council for the Development of French in Louisiana (CODOFIL): Peggy Freehan, Karla Ewing, Marguerite Justus, Jennifer Rodrigues, and Florence Thunissen from March 1st 2025 to now.

All email communications, including any and all attachments, which include this “@arlaw.com” in either the subject line, content, to, from or any other part of the email in communication with any of the following people affiliated with The Council for the Development of French in Louisiana (CODOFIL): Peggy Freehan, Karla Ewing, Marguerite Justus, Jennifer Rodrigues, and Florence Thunissen from March 1st 2025 to now.

8.

On March 20, 2026, UTNO submitted a public records request under the Louisiana Public Records Act, La. R.S. 44:1 *et seq.* for records described in *Exhibit B*, under the title “Earned Fees”:

At the March 10th, 2026 board meeting, during the financial updates, led by EdOps staff member, Mike Mesterharm - a slide entitled “Annotated Financials” was presented. On that slide, in the revenue portion, there was a breakdown of “earned fees” into actual, budget and variance. Please provide documentation detailing the source of these “actual earned fees” amounting to \$2,608,379.

9.

On March 20, 2026, UTNO submitted a public records request under the Louisiana Public Records Act, La. R.S. 44:1 *et seq.* for records described in *Exhibit C*, under the title “General Financials” :

Comprehensive Audited Annual Financial Reports for the two most recent complete fiscal years, including 2024.

The general ledger or similar document that shows itemized revenue and expenditures for each of the following fiscal years: 2024-2025 and 2025-2026.

The Operating Budgets for the current fiscal year as well as 2024-2025 and any amendments to the current fiscal year budget that have been either considered and/or adopted, with all supporting documents such as executive summaries, tables, charts, including budget vs actuals comparison for each of the above referenced fiscal years.

10.

On March 20, 2026, UTNO submitted a public records request under the Louisiana Public Records Act, La. R.S. 44:1 *et seq.* for records described in *Exhibit D*, under the title “Colorado Retreat Expenses”:

All expenditures related to the recent trip to Colorado discussed in the superintendent's report during the board meeting on March 10, 2026 with the following object or function codes:

- a. 580,581,582,583 “Travel”
- b. 320 “Purchased educational services”
- c. 2230 - 2239 “instructional staff training services”
- d. 2220 “Instruction and Curriculum Development Services”
- e. 2232 “Special Education Programs”
- f. 4551 Title II, Part D – Technology

For each expense please include the date of expenditure, vendor name, expenditure type (function and object), expenditure purpose/description, Expenditure amount and expenditure funding source.

11.

On March 20, 2026, UTNO submitted a public records request under the Louisiana Public Records Act, La. R.S. 44:1 *et seq.* for records described in *Exhibit E*, under the title “Vendor List”:

Preferred Vendor List for the 2024, 2025, and 2026 fiscal years. For each vendor, contractor or consultant, the list should include at minimum the name of the vendor, contractor or consultant, the start and end dates of the contracts and the total amount paid in the associated fiscal year.

Approved Vendor List for the 2024, 2025 and 2026 fiscal years. For each vendor, contractor or consultant, the list should include at minimum the name of the vendor, contractor or consultant, the start and end dates of the contracts and the total amount paid in the associated fiscal year.

12.

UTNO requested that the aforementioned records described in paragraphs seven through eleven be produced in electronic format if available.

13.

Dr. McLaurin routed UTNO’s public records requests to outside counsel (Lycée Counsel). At all times herein, Lycée Counsel issued responses on Dr. McLaurin’s behalf.

14.

On March 30, 2026, Dr. McLaurin issued the same standardized response to each distinct records request, stating:

“Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege. Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees’ or students’ privacy in accordance with state law.” *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d

456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202. *Exhibits F - J.*

15.

On April 27, 2026, UTNO re-urged its requests for records sought under the Earned Fees, General Financials, Colorado Retreat Expenses and Vendor List requests, highlighting the deficiencies of the March 30 responses. *Exhibits K- N.* Dr. McLaurin did not respond. Approximately three months later, on July 6, 2026, Dr. McLaurin notified UTNO that there were no records responsive to its records request concerning Vendor List. *Exhibit O.*

16.

Other than his July response to the Vendor List, as of at least August 24, 2026, Dr. McLaurin had not provided UTNO with final written determinations as to its right to obtain the records requested between March 19 and March 20, 2026, nor had he provided UTNO with an expected date of production.

17.

After the filing of Plaintiff's Original Petition, Dr. McLaurin issued a response to the request for Codofil Adams & Reese advising that there are "...no non-privileged documents responsive to this request." *Exhibit P.*

18.

On August 26, 2026, Lycée Counsel produced an one page document in response to UTNO's request for Earned Fees. The document does not identify the underlying sources of over two million dollars classified as "Other Miscellaneous Revenues," and therefore does not fully respond to UTNO's request for documentation detailing the sources of the \$2,608,379 in actual earned fees. *Exhibits B and Q.*

19.

On August 28, 2026, Dr. McLaurin alleged that records responsive to the request for General Financials and Colorado Retreat Expenses were available for viewing at the office of Lycée Counsel but subsequently did not allow UTNO as an organization to access and view these records. *Exhibit R.*

20.

At all relevant times described herein, UTNO Organizing Director, Colette Tippy, a person of the majority, acting in the course and scope of her employment, made attempts to review the records alleged to be responsive to the requests for General Financials and Colorado Retreat Expenses.

21.

To date, Dr. McLaurin has not fully produced responsive documents to UTNO's public records requests for Earned Fees, or permitted UTNO access to inspect those documents alleged to be responsive to the requests for General Financials and Colorado Retreat Expenses.

LEGAL BASIS FOR MANDAMUS

22.

Plaintiff re-alleges and incorporates paragraphs 1 -21.

23.

The Louisiana Constitution guarantees the right of access to public records providing that “[n]o person shall be denied the right to...examine public documents, except in cases established by law.” La. Const. art. XII § 3.

24.

The Louisiana Public Records Act further safeguards the public’s right of access to public records. Any person of the age of majority may inspect, copy, reproduce or obtain a copy or reproduction, of any public record, in accordance with the statute, except as otherwise provided by law. La. R.S. 44:31(B)(1) and (B)(2).

25.

The burden of proving that a public record is not subject to inspection, copying, or reproduction shall rest with the custodian of records. La. R.S. 44:31(B)(3).

26.

The Louisiana Supreme Court has held that these laws should be "construed liberally in favor of free and unrestricted access to the records, and that access can be denied only when a law, specifically and unequivocally, provides otherwise.... Whenever there is doubt as to whether the public has the right of access to certain records, the doubt must be resolved in favor of the public's right to see." *Title Research Corp. v. Rausch*, 450 So. 2d 933, (La. 1984).

27.

La R.S. 44:1 defines “custodian” as “the public official or head of any public body having custody or control of a public record, or a representative specifically authorized by him to respond to requests to inspect any such public records.”

28.

A writ of mandamus is the proper procedural means to require a custodian to produce public records. *Alliance For Affordable Energy v. Frick*, 96-1723, (La. App. 4 Cir. 5/28/97), 695 So.2d 1126. The requesting party’s right to petition the court for a writ of mandamus is triggered when a custodian fails to comply with the Louisiana Public Records Act. La. C.C.P. art. 3863. La. R.S. 44:35 (A). The custodian’s failure to perform also entitles the requester to petition the court for declaratory relief. La. R.S. 44:35 (A).

CAUSE OF ACTION: VIOLATION OF THE LOUISIANA PUBLIC RECORDS LAW

29.

Plaintiff re-alleges and incorporates paragraphs 1 - 28.

30.

Public records must be generally made available at the time of the request, except when reasonable delay may be necessary to compile, review, and, when necessary, redact or withhold certain records that are not subject to production. *Roper v. City of Baton Rouge/Parish of East Baton Rouge*, 2016-1025, (La. App. 1 Cir. 3/15/18), 244 So. 3d 450, 459. La. R.S. 44:33(A) and

(B)(1); La. R.S. 44:35(A).

31.

However, within five business days of the request, the custodian must provide the requester with a written determination as to whether the requested records are public records or exempt from production. *Roper*, 244 So. 3d at 459. La. R.S. § 44:32 (D).

32.

When the custodian determines the record is exempt from production, the custodian must also provide a legal basis for their determination. *Roper*, 244 So. 3d at 459. La. R.S. § 44:32 (D). This “exemption notice” must contain a reference to the basis under law which the custodian has determined exempts a record, or any part thereof, from inspection, copying, or reproduction. La. R.S. 44:32 (D).

33.

Should the custodian require additional time to make the determination required by La. R.S. 44:32 (D), the custodian must also, within five business days of the request, provide an “...estimate of the time reasonably necessary for collection, segregation, redaction, examination, or review of a records request.” La. R.S. 44:35(A). *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, p.11-12 (La.App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202-1203.

34.

The purpose of the final determination required by La. R.S. 44:32 (D) is to inform the requester as to their rights of access to the requested records. *Heath v. City of Alexandria*, 2009-28 (La. App. 3 Cir. 5/6/09), 11 So. 3d 569. Likewise, when the custodian withholds records, the “exemption notice” must be provided, otherwise “...absent some independent knowledge of the document’s existence, the requesting party would have no way of knowing the custodian made this determination and withheld the document. Unaware of the determination, the requesting party would have no reason to pursue judicial review of the determination.” *Roper*, 244 So. 3d at 464-466.

35.

Any person who is denied the right to inspect or copy a record either by determination of the custodian, or by the passage of five days ... without receiving a determination in writing by the Custodian or an estimate of time reasonably necessary to redact and/or review of a records request “may institute proceedings for the issuance of a writ of mandamus, injunctive or declaratory relief, together with attorney’s fees, costs and damages...” La. R.S. 44:35 (A).

36.

The Fourth Circuit recognizes the right of juridical persons to invoke the provisions of the Louisiana Public Records Act. *Amoco Production Co., v Landry*, 426 So. 2d 220 (La. App. 4th Cir. 1982) writ denied 433 So.2d 164 (La.1983), La. R.S. 1:10, See also *Gannett River States v. Monroe City School Board*, 44,231, (La. App. 2 Cir. 4/8/2009), 8 So.3d 833, 839 n.3, writ denied, 09–1029 (La.6/19/09), 10 So.3d 745. Accordingly, UTNO is entitled to seek relief to the fullest extent of the law.

37.

UTNO made public records requests between March 19 and March 20, 2026, triggering Dr. McLaurin's obligation to provide written determinations in response, within five business days of the requests. These legal deadlines fell respectively on March 26, and March 27, 2026. La. R.S. 44:32 (D). Dr. McLaurin, through Lycée Counsel, issued responses to each records request on March 30, 2026. *Exhibits F - J*.

38.

Further, Dr. McLaurin's untimely responses do not constitute "final determinations" as contemplated by the Louisiana Public Records Act. The stock responses state only that Lycée is in the process of searching for documents responsive to the requests and that a confidentiality/privilege review will occur in the future. *Exhibits F-J*. Only after the review will responsive documents be provided and production will occur within a "reasonable amount of time." *Id.* This language neither affirmatively determines that UTNO is entitled to obtain copies of the requested records nor does it provide the statutory exemption notice, which requires Dr. McLaurin to identify the specific records being withheld and the legal basis for withholding them.

39.

UTNO does not know why Dr. McLaurin failed to provide timely determinations or produce the requested records. Any concerns regarding confidentiality or privilege do not justify withholding the requested records in their entirety, as protected information can be segregated and/or easily redacted from otherwise public records in accordance with law.

40.

Even assuming that Dr. McLaurin's responses constituted notice that additional time was necessary to review the requested records, they did not provide the estimate of time contemplated by La. R.S. 44:35(A). Rather, the responses merely indicated that records would be produced "within a reasonable amount of time," without identifying any anticipated date or timeframe for completion. Such an indefinite and prolonged delay is unreasonable and inconsistent with the public's fundamental right to promptly access public records.

CIVIL PENALTIES

41.

Plaintiff re-alleges and incorporates paragraphs 1 - 40.

42.

When the court finds that the custodian unreasonably or arbitrarily failed to respond to the request as required by the statute, it may award the requestor civil penalties not to exceed one hundred dollars per day, exclusive of Saturdays, Sundays, and legal public holidays, for each such day of such failure to give notification. La. R.S 44:35(E)(1).

43.

Dr. McLaurin failed to meet the very legal obligations he cited in his responses, demonstrating that his failure to comply was arbitrary. When first responding to each of the five distinct records requests, Dr. McLaurin referred to La. R.S. 44:33(B)(1) and Louisiana case law to support a delay in record production. La. R.S. 44:33(B)(1) provides that when public records are not available because they are in active use, the custodian must promptly fix a day and hour within three days, exclusive of Saturdays, Sundays, and legal holidays, on which the requestor may obtain or review the records. The cases cited, *Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462 and *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202, also recognize that, even when circumstances warrant delayed production, the custodian must provide a written estimate of the time needed to segregate, redact, or review the requested records within five business days of the request. Although Dr. McLaurin's responses acknowledged these obligations, he failed to meet them.

44.

The arbitrariness of Dr. McLaurin's actions is further evident by his response to the request for Codofil Adams & Reese. On March 27, 2026, UTNO submitted an identical request for Codofil Adams and Reese records to the Council For The Development of French in Louisiana (CODOFIL). CODOFIL responded with records on April 20, 2026. *Exhibit S*. In contrast, on August 26, 2026, Dr. McLaurin responded that, "...there are no non-privileged documents responsive to this request," and did not identify the nature of the privilege or basis for the privilege. *Exhibit P*.

45.

Additionally, UTNO's efforts to obtain the status of the records requests before filing suit were also ignored. As previously discussed herein, on April 27, 2026, UTNO followed up with Dr. McLaurin and restated its requests. *Exhibits K- N*. Dr. McLaurin did not acknowledge the correspondence or otherwise provide a status update.

46.

UTNO respectfully urges this Court to find that Dr. McLaurin unreasonably and arbitrarily failed to comply with the Louisiana Public Records Law Act through the following acts:

1. Failing to make timely determinations as to whether the requested records are public records or otherwise exempt from production as contemplated by La. R.S. 44:32 (D).
2. Failing to provide an "estimate of the time reasonably necessary for the collection, segregation, redaction, examination, or review of a records request." La. R.S. 44:35(A).

ATTORNEY'S FEES AND COSTS

47.

UTNO re-alleges and incorporates paragraphs 1 - 46.

48.

If a person seeking the right to inspect, copy, or reproduce a record or to receive or obtain a copy or reproduction of a public record prevails in such suit, he shall be awarded reasonable attorney fees and other costs of litigation. If such person prevails in part, the court may in its discretion award him reasonable attorney fees or an appropriate portion thereof.

La. R.S. 44:35(D)(1).

PRAYER FOR RELIEF

WHEREFORE, pursuant to La. R.S. 44:1, *et.seq.* Plaintiff, the AMERICAN FEDERATION OF TEACHERS 527 UNITED TEACHERS OF NEW ORLEANS, prays that this Honorable Court:

- A. Pursuant to La. C.C.P. art. 2596, allow the completion of discovery, prior to the setting this matter for hearing;
- B. Pursuant to La. C.C.P. art. 3865 and La. R.S. 44:35, immediately upon filing of this Petition, issue an alternative writ of mandamus, directing Dr. Chase McLaurin in his capacity as custodian of records for Lycée Français International De La Louisiane, to immediately produce or make available, all requested records improperly withheld from UTNO or to show cause to the contrary at hearing;
- C. Award UTNO civil penalties, pursuant to La. R.S. 44:35(E)(1);
- D. Award UTNO attorney's fees and costs, pursuant to La. R.S. 44:35(D)(1);
- E. All equitable relief this Honorable Court deems just.

DATED: October 13, 2026.**RESPECTFULLY SUBMITTED,**

WORKPLACE JUSTICE PROJECT



Andrea M. Agee, LSBN 34887

andrea@wjpnola.org

7600 Jeannette Street

New Orleans, La 70118

Telephone: (504) 266 0164

PLEASE SERVE

Lycée Français International de la Louisiane
Through its Registered Agent,
Dr. Chase McLaurin
1601 Leonidas Street
New Orleans, La 70118

Dr. Chase McLaurin, In His Official Capacity As Custodian Of Records,
1601 Leonidas Street
New Orleans, La 70118

March 19th, 2026

Subject: Public Records Request – Adams & Reese Communications

Dear Records Custodian,

Under the Louisiana Public Records Law, La. R.S. 44:1 et seq., please produce a copy of the following documents immediately upon receipt of this letter:

1. All communications with the firm of Adams & Reese with any of the following people affiliated with The Council for the Development of French in Louisiana (CODOFIL): Peggy Freehan, Karla Ewing, Marguerite Justus, Jennifer Rodrigues, and Florence Thunissen from March 1st 2025 to now.
2. All email communications, including any and all attachments, which include this "@arlaw.com" in either the subject line, content, to, from or any other part of the email in communication with any of the following people affiliated with The Council for the Development of French in Louisiana (CODOFIL): Peggy Freehan, Karla Ewing, Marguerite Justus, Jennifer Rodrigues, and Florence Thunissen from March 1st 2025 to now.

Additionally, please be advised:

If you question whether the record requested is a public record, in accordance with La. R.S.44:32D, please notify me in writing of your determination, and the reasons therefore within three (3) days of the receipt of this request, exclusive of Saturdays, Sundays, and legal public holidays. Your response shall include reference to the basis under law which you have determined exempts the record, or any part thereof, from inspection, copying, or reproduction.

If the public record is not immediately available, in accordance with La. R.S. 44:33, please certify this in writing promptly, and fix a day and hour within three (3) days, exclusive of Saturdays, Sundays, and legal public holidays, for the exercise of the right granted in the Public Records Act.

If any public record that I have requested is not in your custody or control, in accordance with La. R.S. 44:34, please certify this in writing to me, and state in detail to the best of your knowledge and belief (1) the reason for the absence of the record from your custody or control, (2) its location, (3) what person then has custody of the record and (4) the manner and method in which, and the exact time at which it was taken from your custody or control. Please include ample and detailed answers, to facilitate the exercise of rights granted in the Public Records Act.

If you are denying any request for production, please provide the following information in accordance with La. R.S. 44:34:

1. Please state the location of the copies of the requested public records.
2. Please state the name or names of all persons who you know or believe has a copy of the requested public records.

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

Please be advised that we reserve all rights to pursue all available legal remedies if we do not receive a response that complies with the Public Records Act within the deadlines established by law. Please contact me if an extension is necessary.

Production of the documents in electronic (pdf) format is preferred.

Thank you very much.

Sincerely,
Margot Marks



Lycée Français de la Nouvelle-Orléans
Public Records Request
Louisiana Revised Statute 44.1

MAIL APPLICATIONS TO:
Lycée Français de la Nouvelle-Orléans
Attention: Custodian of Records
1601 Leonidas St
New Orleans, La 70118
Telephone: 504.620.5500

This request may be emailed to:
PublicRecordsRequest@lfno.org

PLEASE PRINT OR TYPE.

Requestor's Information		
Applicant Name Margot Marks		Date of Request (mm/dd/yyyy) 03/20/2026
Organization Name United Teachers of New Orleans		
Mailing Address 3401 Canal St.		
City New Orleans		State ZIP LA 70119
Contact Telephone Number (504) 339-9591	Fax Number	
Email Address mmarks@utno.org		
Requested Documents		
(please be as specific as possible; attach additional pages as necessary)		
Dear Records Custodian, Please see the attached document entitled "PRR - UTNO - Earned Fees" with the details of this public records request. If you need any additional information to process this request or if there is an issue with the formatting, please let me know. Cordially, Margot Marks		

Authorization	
Name Margot Marks	Title Staff Organizer
Signature X	Date (mm/dd/yyyy) 03/20/2026

A signature is not required if the request is submitted electronically.

INSTRUCTIONS

1. Complete all information in the fields provided. If you have any questions, please call (504) 620-5500 for assistance.
2. The completed form may be submitted by email, mail, courier, or in person to the Lycee Francais de la Nouvelle Orleans, Att: Custodian of Records, at the addresses listed above. Completed requests may also be emailed to PublicRecordsRequest@lfno.org
3. Once the request is received by the Custodian of Records, it will be reviewed to determine if the requested records can be disclosed. If the requested records are exempt from disclosure, the requestor will be notified the determination and the reasons for it.
If the requested records can be disclosed, the requestor will receive a "Notice of Estimated Costs for Copies of Public Records" form by email, mail, or fax.
4. Delivery Options (*Please choose one*):
 - (a) Have the records separated for in-person review. To view records on a particulate date, please list it here: 3/25/20 . You will be notified when the records are ready for your review during regular office hours. There is no cost to view a public record. After the records have been reviewed, the requestor can ask that copies be made of selected records. LFNO will prepare a Notice of Estimated Costs & Public Records Request. Once payment by money order made payable to LFNO is received, copies of the selected records will be made.
 - (b) Have copies made of the records for personal pickup. The cost of copies must be paid IN ADVANCE by money order made payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.
 - (c) Have copies of the requested records mailed to the requestor. The cost of the copies must be paid IN ADVANCE by check or money order payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.

Costs due are payable upon receipt of the Notice of Estimated Costs for Copies of Public Records notice.

If payment is not received within ten days after the notice is sent, the requestor must submit a new public records request.

PRODUCTION/COPYING OF DOCUMENTS WILL NOT BEGIN UNTIL PAYMENT IS RECEIVED BY LFNO.

Uniform Fee Schedule

The following Uniform Fee Schedule must be used when furnishing copies of public records requested by the public:

Uniform Fee Schedule	
Item	Regular Fee
Copies, including emails and other records and computer reports, up to 8½ by 11 inches	\$1 per one-sided page \$2 per two-sided copy
Copy, color, up to 8½ by 11 inches	\$1.50 per one-sided page \$2.50 per two-sided copy
Copy, larger than 8½ by 11 inches	\$3 per page
Copy of existing electronic file	\$1 per one-sided page \$2 per two-sided copy
Copy of disk, CD, videotape or audiotape (disk, CD, or tape shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Computer generated report that requires data processing time (disk/CD shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Copies printed or produced by outside sources at the request of the department	Actual cost + Regular Fees
Postage & Handling	Actual cost + Regular Fees
Surcharge for every 50 pages	\$10
Certification of copy	\$5 per certification
Viewing records	No charge during regular office hours

Please see Louisiana Public Records Act , R.S. 44:1 *et seq.*

All funds collected from public records request fees will be used to help fund student activities and initiatives.

March 20th, 2026

Subject: Public Records Request – Earned Fees Line Item

Dear Records Custodian,

Under the Louisiana Public Records Law, La. R.S. 44:1 et seq., please produce a copy of the following documents immediately upon receipt of this letter:

1. At the March 10th, 2026 board meeting, during the financial updates, led by EdOps staff member, Mike Mesterharm - a slide entitled "Annotated Financials" was presented. On that slide, in the revenue portion, there was a breakdown of "earned fees" into actual, budget and variance. Please provide documentation detailing the source of these "actual earned fees" amounting to \$2,608,379.

Additionally, please be advised:

If you question whether the record requested is a public record, in accordance with La. R.S.44:32D, please notify me in writing of your determination, and the reasons therefore within three (3) days of the receipt of this request, exclusive of Saturdays, Sundays, and legal public holidays. Your response shall include reference to the basis under law which you have determined exempts the record, or any part thereof, from inspection, copying, or reproduction.

If the public record is not immediately available, in accordance with La. R.S. 44:33, please certify this in writing promptly, and fix a day and hour within three (3) days, exclusive of Saturdays, Sundays, and legal public holidays, for the exercise of the right granted in the Public Records Act.

If any public record that I have requested is not in your custody or control, in accordance with La. R.S. 44:34, please certify this in writing to me, and state in detail to the best of your knowledge and belief (1) the reason for the absence of the record from your custody or control, (2) its location, (3) what person then has custody of the record and (4) the manner and method in which, and the exact time at which it was taken from your custody or control. Please include ample and detailed answers, to facilitate the exercise of rights granted in the Public Records Act.

If you are denying any request for production, please provide the following information in accordance with La. R.S. 44:34:

1. Please state the location of the copies of the requested public records.
2. Please state the name or names of all persons who you know or believe have a copy of the requested public records.

Please be advised that we reserve all rights to pursue all available legal remedies if we do not receive a response that complies with the Public Records Act within the deadlines established by law. Please contact me if an extension is necessary.

Production of the documents in electronic format is preferred.

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

Thank you very much.

Sincerely,
Margot Marks



Lycée Français de la Nouvelle-Orléans
Public Records Request
Louisiana Revised Statute 44.1

MAIL APPLICATIONS TO:
Lycée Français de la Nouvelle-Orléans
Attention: Custodian of Records
1601 Leonidas St
New Orleans, La 70118
Telephone: 504.620.5500

This request may be emailed to:
PublicRecordsRequest@lfno.org

PLEASE PRINT OR TYPE.

Requestor's Information			
Applicant Name Margot Marks		Date of Request (mm/dd/yyyy) 03/20/2026	
Organization Name United Teachers of New Orleans			
Mailing Address 3401 Canal St.			
City New Orleans		State LA	ZIP 70119
Contact Telephone Number (504) 339-9591		Fax Number	
Email Address mmarks@utno.org			
Requested Documents			
(please be as specific as possible; attach additional pages as necessary)			
Dear Records Custodian, Please see the attached document entitled "PRR - UTNO - General Financials" with the details of this public records request. If you need any additional information to process this request or if there is an issue with the formatting, please let me know. Cordially, Margot Marks			

Authorization	
Name Margot Marks	Title Staff Organizer
Signature X	Date (mm/dd/yyyy) 03/20/2026

A signature is not required if the request is submitted electronically.

INSTRUCTIONS

1. Complete all information in the fields provided. If you have any questions, please call (504) 620-5500 for assistance.
2. The completed form may be submitted by email, mail, courier, or in person to the Lycee Francais de la Nouvelle Orleans, Att: Custodian of Records, at the addresses listed above. Completed requests may also be emailed to PublicRecordsRequest@lfno.org
3. Once the request is received by the Custodian of Records, it will be reviewed to determine if the requested records can be disclosed. If the requested records are exempt from disclosure, the requestor will be notified the determination and the reasons for it.
If the requested records can be disclosed, the requestor will receive a "Notice of Estimated Costs for Copies of Public Records" form by email, mail, or fax.
4. Delivery Options (*Please choose one*):
 - (a) Have the records separated for in-person review. To view records on a particulate date, please list it here: 3/25/20 . You will be notified when the records are ready for your review during regular office hours. There is no cost to view a public record. After the records have been reviewed, the requestor can ask that copies be made of selected records. LFNO will prepare a Notice of Estimated Costs & Public Records Request. Once payment by money order made payable to LFNO is received, copies of the selected records will be made.
 - (b) Have copies made of the records for personal pickup. The cost of copies must be paid IN ADVANCE by money order made payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.
 - (c) Have copies of the requested records mailed to the requestor. The cost of the copies must be paid IN ADVANCE by check or money order payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.

Costs due are payable upon receipt of the Notice of Estimated Costs for Copies of Public Records notice.

If payment is not received within ten days after the notice is sent, the requestor must submit a new public records request.

PRODUCTION/COPYING OF DOCUMENTS WILL NOT BEGIN UNTIL PAYMENT IS RECEIVED BY LFNO.

Uniform Fee Schedule

The following Uniform Fee Schedule must be used when furnishing copies of public records requested by the public:

Uniform Fee Schedule	
Item	Regular Fee
Copies, including emails and other records and computer reports, up to 8½ by 11 inches	\$1 per one-sided page \$2 per two-sided copy
Copy, color, up to 8½ by 11 inches	\$1.50 per one-sided page \$2.50 per two-sided copy
Copy, larger than 8½ by 11 inches	\$3 per page
Copy of existing electronic file	\$1 per one-sided page \$2 per two-sided copy
Copy of disk, CD, videotape or audiotape (disk, CD, or tape shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Computer generated report that requires data processing time (disk/CD shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Copies printed or produced by outside sources at the request of the department	Actual cost + Regular Fees
Postage & Handling	Actual cost + Regular Fees
Surcharge for every 50 pages	\$10
Certification of copy	\$5 per certification
Viewing records	No charge during regular office hours

Please see Louisiana Public Records Act , R.S. 44:1 *et seq.*

All funds collected from public records request fees will be used to help fund student activities and initiatives.

March 20th, 2026

Subject: Public Records Request – General Financials

Dear Records Custodian,

Under the Louisiana Public Records Law, La. R.S. 44:1 et seq., please produce a copy of the following documents immediately upon receipt of this letter:

1. Comprehensive Audited Annual Financial Reports for the two most recent complete fiscal years, including 2024.
2. The general ledger or similar document that shows itemized revenue and expenditures for each of the following fiscal years: 2024-2025 and 2025-2026
3. The Operating Budgets for the current fiscal year as well as 2024-2025 and any amendments to the current fiscal year budget that have been either considered and/or adopted, with all supporting documents such as executive summaries, tables, charts, including budget vs actuals comparison for each of the above referenced fiscal years

Additionally, please be advised:

If you question whether the record requested is a public record, in accordance with La. R.S.44:32D, please notify me in writing of your determination, and the reasons therefore within three (3) days of the receipt of this request, exclusive of Saturdays, Sundays, and legal public holidays. Your response shall include reference to the basis under law which you have determined exempts the record, or any part thereof, from inspection, copying, or reproduction.

If the public record is not immediately available, in accordance with La. R.S. 44:33, please certify this in writing promptly, and fix a day and hour within three (3) days, exclusive of Saturdays, Sundays, and legal public holidays, for the exercise of the right granted in the Public Records Act.

If any public record that I have requested is not in your custody or control, in accordance with La. R.S. 44:34, please certify this in writing to me, and state in detail to the best of your knowledge and belief (1) the reason for the absence of the record from your custody or control, (2) its location, (3) what person then has custody of the record and (4) the manner and method in which, and the exact time at which it was taken from your custody or control. Please include ample and detailed answers, to facilitate the exercise of rights granted in the Public Records Act.

If you are denying any request for production, please provide the following information in accordance with La. R.S. 44:34:

1. Please state the location of the copies of the requested public records.
2. Please state the name or names of all persons who you know or believe have a copy of the requested public records.

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

Please be advised that we reserve all rights to pursue all available legal remedies if we do not receive a response that complies with the Public Records Act within the deadlines established by law. Please contact me if an extension is necessary.

Production of the documents in electronic format is preferred.

Thank you very much.

Sincerely,
Margot Marks

**Lycée Français de la Nouvelle-Orléans****Public Records Request***Louisiana Revised Statute 44.1*

MAILED APPLICATION NO: 2026 OCT 13 A 09:15
Lycée Français de la Nouvelle-Orléans
Attention: Custodian of Records
1601 Leonce St.
New Orleans, La 70118
Telephone: 504.586.2500
CIVIL DISTRICT COURT
This request may be emailed to:
PublicRecordsRequest@lfno.org

PLEASE PRINT OR TYPE.

Requestor's Information			
Applicant Name Margot Marks		Date of Request (mm/dd/yyyy) 03/20/2026	
Organization Name United Teachers of New Orleans			
Mailing Address 3401 Canal St.			
City New Orleans		State LA	ZIP 70119
Contact Telephone Number (504) 339-9591		Fax Number	
Email Address mmarks@utno.org			
Requested Documents			
(please be as specific as possible; attach additional pages as necessary)			
Dear Records Custodian, Please see the attached document entitled "PRR - UTNO - Colorado Retreat Expenses" with the details of this public records request. If you need any additional information to process this request or if there is an issue with the formatting, please let me know. Cordially, Margot Marks			

Authorization	
Name Margot Marks	Title Staff Organizer
Signature X	Date (mm/dd/yyyy) 03/20/2026

A signature is not required if the request is submitted electronically.

INSTRUCTIONS

FILED

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CIVIL
DISTRICT COURT

1. Complete all information in the fields provided. If you have any questions, please call (504) 620-5500 for assistance.
2. The completed form may be submitted by email, mail, courier, or in person to the Lycee Francais de la Nouvelle Orleans, Att: Custodian of Records, at the addresses listed above. Completed requests may also be emailed to PublicRecordsRequest@lfno.org.
3. Once the request is received by the Custodian of Records, it will be reviewed to determine if the requested records can be disclosed. If the requested records are exempt from disclosure, the requestor will be notified the determination and the reasons for it.
If the requested records can be disclosed, the requestor will receive a "Notice of Estimated Costs for Copies of Public Records" form by email, mail, or fax.
4. Delivery Options (*Please choose one*):
 - (a) Have the records separated for in-person review. To view records on a particulate date, please list it here: 3/25/20. You will be notified when the records are ready for your review during regular office hours. There is no cost to view a public record. After the records have been reviewed, the requestor can ask that copies be made of selected records. LFNO will prepare a Notice of Estimated Costs & Public Records Request. Once payment by money order made payable to LFNO is received, copies of the selected records will be made.
 - (b) Have copies made of the records for personal pickup. The cost of copies must be paid IN ADVANCE by money order made payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.
 - (c) Have copies of the requested records mailed to the requestor. The cost of the copies must be paid IN ADVANCE by check or money order payable to LFNO. If payment is not received within ten days after the notice is sent, the requestor must submit a new request.

Costs due are payable upon receipt of the Notice of Estimated Costs for Copies of Public Records notice.

If payment is not received within ten days after the notice is sent, the requestor must submit a new public records request.

PRODUCTION/COPYING OF DOCUMENTS WILL NOT BEGIN UNTIL PAYMENT IS RECEIVED BY LFNO.

Uniform Fee Schedule

The following Uniform Fee Schedule must be used when furnishing copies of public records requested by the public:

Uniform Fee Schedule	
Item	Regular Fee
Copies, including emails and other records and computer reports, up to 8½ by 11 inches	\$1 per one-sided page \$2 per two-sided copy
Copy, color, up to 8½ by 11 inches	\$1.50 per one-sided page \$2.50 per two-sided copy
Copy, larger than 8½ by 11 inches	\$3 per page
Copy of existing electronic file	\$1 per one-sided page \$2 per two-sided copy
Copy of disk, CD, videotape or audiotape (disk, CD, or tape shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Computer generated report that requires data processing time (disk/CD shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Copies printed or produced by outside sources at the request of the department	Actual cost + Regular Fees
Postage & Handling	Actual cost + Regular Fees
Surcharge for every 50 pages	\$10
Certification of copy	\$5 per certification
Viewing records	No charge during regular office hours

Please see Louisiana Public Records Act, R.S. 44:1 *et seq.*

All funds collected from public records request fees will be used to help fund student activities and initiatives.

March 20th, 2026

Subject: Public Records Request – Expenses related to staff retreat in Colorado

Dear Records Custodian,

Under the Louisiana Public Records Law, La. R.S. 44:1 et seq., please produce a copy of the following documents immediately upon receipt of this letter:

1. All expenditures related to the recent trip to Colorado discussed in the superintendent's report during the board meeting on March 10, 2026 with the following object or function codes:
 - a. 580,581,582,583 "Travel"
 - b. 320 "Purchased educational services"
 - c. 2230 - 2239 "instructional staff training services"
 - d. 2220 "Instruction and Curriculum Development Services"
 - e. 2232 "Special Education Programs"
 - f. 4551 Title II, Part D – Technology

For each expense please include the date of expenditure, vendor name, expenditure type (function and object), expenditure purpose/description, Expenditure amount and expenditure funding source.

Additionally, please be advised:

If you question whether the record requested is a public record, in accordance with La. R.S.44:32D, please notify me in writing of your determination, and the reasons therefore within three (3) days of the receipt of this request, exclusive of Saturdays, Sundays, and legal public holidays. Your response shall include reference to the basis under law which you have determined exempts the record, or any part thereof, from inspection, copying, or reproduction.

If the public record is not immediately available, in accordance with La. R.S. 44:33, please certify this in writing promptly, and fix a day and hour within three (3) days, exclusive of Saturdays, Sundays, and legal public holidays, for the exercise of the right granted in the Public Records Act.

If any public record that I have requested is not in your custody or control, in accordance with La. R.S. 44:34, please certify this in writing to me, and state in detail to the best of your knowledge and belief (1) the reason for the absence of the record from your custody or control, (2) its location, (3) what person then has custody of the record and (4) the manner and method in which, and the exact time at which it was taken from your custody or control. Please include ample and detailed answers, to facilitate the exercise of rights granted in the Public Records Act.

If you are denying any request for production, please provide the following information in accordance with La. R.S. 44:34:

1. Please state the location of the copies of the requested public records.
2. Please state the name or names of all persons who you know or believe have a copy of the requested public records.

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CIVIL

DISTRICT COURT

Please be advised that we reserve all rights to pursue all available legal remedies if we do not receive a response that complies with the Public Records Act within the deadlines established by law. Please contact me if an extension is necessary.

Production of the documents in electronic format is preferred.

Thank you very much.

Sincerely,
Margot Marks



Lycée Français de la Nouvelle-Orléans
Public Records Request
Louisiana Revised Statute 44.1

MAIL APPLICATIONS TO:
Lycée Français de la Nouvelle-Orléans
Attention: Custodian of Records
1601 Leonidas St
New Orleans, La 70118
Telephone: 504.620.5500

This request may be emailed to:
PublicRecordsRequest@lfno.org

PLEASE PRINT OR TYPE.

Requestor's Information		
Applicant Name Margot Marks		Date of Request (mm/dd/yyyy) 03/20/2026
Organization Name United Teachers of New Orleans		
Mailing Address 3401 Canal St.		
City New Orleans		State ZIP LA 70119
Contact Telephone Number (504) 339-9591	Fax Number	
Email Address mmarks@utno.org		
Requested Documents		
(please be as specific as possible; attach additional pages as necessary)		
Dear Records Custodian, Please see the attached document entitled "PRR - UTNO - Vendor List" with the details of this public records request. If you need any additional information to process this request or if there is an issue with the formatting, please let me know. Cordially, Margot Marks		

Authorization	
Name Margot Marks	Title Staff Organizer
Signature X	Date (mm/dd/yyyy) 03/20/2026

A signature is not required if the request is submitted electronically.

INSTRUCTIONS

1. Complete all information in the fields provided. If you have any questions, please call (504) 620-5500 for assistance.
2. The completed form may be submitted by email, mail, courier, or in person to the Lycee Francais de la Nouvelle Orleans, Att: Custodian of Records, at the addresses listed above. Completed requests may also be emailed to PublicRecordsRequest@lfno.org
3. Once the request is received by the Custodian of Records, it will be reviewed to determine if the requested records can be disclosed. If the requested records are exempt from disclosure, the requestor will be notified the determination and the reasons for it.
If the requested records can be disclosed, the requestor will receive a "Notice of Estimated Costs for Copies of Public Records" form by email, mail, or fax.
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 - (a) Have the records separated for in-person review. To view records on a particulate date, please list it here: 3/25/20 . You will be notified when the records are ready for your review during regular office hours. There is no cost to view a public record. After the records have been reviewed, the requestor can ask that copies be made of selected records. LFNO will prepare a Notice of Estimated Costs & Public Records Request. Once payment by money order made payable to LFNO is received, copies of the selected records will be made.
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Copy, larger than 8½ by 11 inches	\$3 per page
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Copy of disk, CD, videotape or audiotape (disk, CD, or tape shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Computer generated report that requires data processing time (disk/CD shall be provided by department only)	\$15 per disk/CD/tape copied + Regular Fees \$30 per USB/DVD copied + Regular Fees
Copies printed or produced by outside sources at the request of the department	Actual cost + Regular Fees
Postage & Handling	Actual cost + Regular Fees
Surcharge for every 50 pages	\$10
Certification of copy	\$5 per certification
Viewing records	No charge during regular office hours

Please see Louisiana Public Records Act , R.S. 44:1 *et seq.*

All funds collected from public records request fees will be used to help fund student activities and initiatives.

March 20th, 2026

Subject: Public Records Request – Vendor List

Dear Records Custodian,

Under the Louisiana Public Records Law, La. R.S. 44:1 et seq., please produce a copy of the following documents immediately upon receipt of this letter:

1. Preferred Vendor List for the 2024, 2025, and 2026 fiscal years. For each vendor, contractor or consultant, the list should include at minimum the name of the vendor, contractor or consultant, the start and end dates of the contracts and the total amount paid in the associated fiscal year.
2. Approved Vendor List for the 2024, 2025 and 2026 fiscal years. For each vendor, contractor or consultant, the list should include at minimum the name of the vendor, contractor or consultant, the start and end dates of the contracts and the total amount paid in the associated fiscal year.

Additionally, please be advised:

If you question whether the record requested is a public record, in accordance with La. R.S.44:32D, please notify me in writing of your determination, and the reasons therefore within three (3) days of the receipt of this request, exclusive of Saturdays, Sundays, and legal public holidays. Your response shall include reference to the basis under law which you have determined exempts the record, or any part thereof, from inspection, copying, or reproduction.

If the public record is not immediately available, in accordance with La. R.S. 44:33, please certify this in writing promptly, and fix a day and hour within three (3) days, exclusive of Saturdays, Sundays, and legal public holidays, for the exercise of the right granted in the Public Records Act.

If any public record that I have requested is not in your custody or control, in accordance with La. R.S. 44:34, please certify this in writing to me, and state in detail to the best of your knowledge and belief (1) the reason for the absence of the record from your custody or control, (2) its location, (3) what person then has custody of the record and (4) the manner and method in which, and the exact time at which it was taken from your custody or control. Please include ample and detailed answers, to facilitate the exercise of rights granted in the Public Records Act.

If you are denying any request for production, please provide the following information in accordance with La. R.S. 44:34:

1. Please state the location of the copies of the requested public records.
2. Please state the name or names of all persons who you know or believe have a copy of the requested public records.

Please be advised that we reserve all rights to pursue all available legal remedies if we do not receive a response that complies with the Public Records Act within the deadlines established by law. Please contact me if an extension is necessary.

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

Production of the documents in electronic format is preferred.

Thank you very much.

Sincerely,
Margot Marks



March 30, 2026

Via Email
Margot Marks
mmarks@utno.org

Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your public records request, "PRR – Codofil Adams and Reese," dated March 19, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege.

Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time, as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees' or students' privacy in accordance with state law. *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202.

Please note that Lycée Français International de la Louisiane collects fees for the copying and production of public records. Prior to copying and production, the school will provide you with an estimate of the costs of the production. Lycée Français International de la Louisiane will produce the records only upon complete payment of the required fees. The base fees are as follows:

- a) \$0.50 per page for paper copies. Two-sided documents are considered two pages.
- b) \$0.50 per page for PDF documents, PowerPoint presentations, and Word documents.
- c) \$10.00 for any other electronic documents that must be provided on a thumb drive or other device.
- d) Additional service fees may apply depending on the scope of the request.

Please do not hesitate to contact us if you have additional questions.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid
John F. Pontin V



March 30, 2026

Via Email
Margot Marks
mmarks@utno.org

Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your public records request, "PRR form - UTNO – Earned Fees," dated March 20, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege.

Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time, as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees' or students' privacy in accordance with state law. *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202.

Please note that Lycée Français International de la Louisiane collects fees for the copying and production of public records. Prior to copying and production, the school will provide you with an estimate of the costs of the production. Lycée Français International de la Louisiane will produce the records only upon complete payment of the required fees. The base fees are as follows:

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- c) \$10.00 for any other electronic documents that must be provided on a thumb drive or other device.
- d) Additional service fees may apply depending on the scope of the request.

Please do not hesitate to contact us if you have additional questions.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid
John F. Pontin V

Exhibit G

adamsandree.com |



March 30, 2026

Via Email
Margot Marks
mmarks@utno.org

Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your public records request, "PRR form - UTNO – General Financials," dated March 20, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege.

Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time, as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees' or students' privacy in accordance with state law. *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202.

Please note that Lycée Français International de la Louisiane collects fees for the copying and production of public records. Prior to copying and production, the school will provide you with an estimate of the costs of the production. Lycée Français International de la Louisiane will produce the records only upon complete payment of the required fees. The base fees are as follows:

- a) \$0.50 per page for paper copies. Two-sided documents are considered two pages.
- b) \$0.50 per page for PDF documents, PowerPoint presentations, and Word documents.
- c) \$10.00 for any other electronic documents that must be provided on a thumb drive or other device.
- d) Additional service fees may apply depending on the scope of the request.

Please do not hesitate to contact us if you have additional questions.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid
John F. Pontin V

adamsandree.com |



March 30, 2026

Via Email
Margot Marks
mmarks@utno.org

Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your public records request, "PRR form - UTNO - Colorado Retreat Expenses," dated March 20, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege.

Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time, as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees' or students' privacy in accordance with state law. *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202.

Please note that Lycée Français International de la Louisiane collects fees for the copying and production of public records. Prior to copying and production, the school will provide you with an estimate of the costs of the production. Lycée Français International de la Louisiane will produce the records only upon complete payment of the required fees. The base fees are as follows:

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- c) \$10.00 for any other electronic documents that must be provided on a thumb drive or other device.
- d) Additional service fees may apply depending on the scope of the request.

Please do not hesitate to contact us if you have additional questions.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid
John F. Pontin V

adamsandree.com |



March 30, 2026

Via Email
Margot Marks
mmarks@utno.org

Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your public records request, "PRR form - UTNO – Vendor List," dated March 20, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Lycée Français International de la Louisiane is in the process of searching for documents responsive to your request. Once located, these documents will then need to be reviewed for confidentiality and privilege.

Lycée Français International de la Louisiane will provide responsive documents within a reasonable amount of time, as provided by La. R.S. 44:33(B)(1). This delay includes any time required for necessary redactions to protect our employees' or students' privacy in accordance with state law. *See Stevens v. St. Tammany Parish Government*, 2017-0959, *5 (La. App. 1 Cir. 7/18/18), 264 So.3d 456, 462; *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, *11 (La. App. 1 Cir. 11/15/19), 290 So.3d 1194, 1202.

Please note that Lycée Français International de la Louisiane collects fees for the copying and production of public records. Prior to copying and production, the school will provide you with an estimate of the costs of the production. Lycée Français International de la Louisiane will produce the records only upon complete payment of the required fees. The base fees are as follows:

- a) \$0.50 per page for paper copies. Two-sided documents are considered two pages.
- b) \$0.50 per page for PDF documents, PowerPoint presentations, and Word documents.
- c) \$10.00 for any other electronic documents that must be provided on a thumb drive or other device.
- d) Additional service fees may apply depending on the scope of the request.

Please do not hesitate to contact us if you have additional questions.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid
John F. Pontin V

adamsandree.com |

April 27th, 2026

Via mmarks@utno.org

Custodian of Records
Lycée Français Internationale de la Louisiane
1601 Leonidas Street, NO, LA
PublicRecordsRequest@lfno.org

Re: Deficient Response to Public Records Request Dated March 20th, 2026

Dear Custodian of Records:

I write regarding the public records request submitted on March 20th, 2026, seeking the following records:

- Documentation explaining "actual earned fees" amounting to \$2,608,379.

On March 30th, 2026, your office responded by stating that you were in the process of searching for documents responsive to my request, and that, once located, these documents would be reviewed and delivered.

At this time, the response appears deficient and does not comply with the requirements of the Louisiana Public Records Law, La. R.S. 44:1 et seq.

Under Louisiana law, public records must be made available for inspection or copying immediately when they are not in active use. If the records are not immediately available, the custodian is required to promptly certify this in writing and **provide a reasonable estimate of the time reasonably necessary** for collection, segregation, redaction, examination, or review of the records. See La. R.S. 44:33(B)(1).

Additionally, when a custodian questions whether a record is subject to disclosure, the custodian must provide written notification of the determination and the reasons therefore within five business days of the request. See La. R.S. 44:32(D).

The response provided by your office is deficient for the following reasons:

- Failure to produce responsive records;
- Failure to provide a reasonable estimated production date;

To the extent your office contends that any records or portions of records are exempt from disclosure, please identify with specificity:

1. The records being withheld or redacted;
2. The statutory basis for each withholding or redaction; and
3. The factual basis supporting the claimed exemption.

Please also note that the documents requested pertain for public dollars and the financials of a public institution and therefore should be easily accessible to the public upon request of documents.

Accordingly, I respectfully request that your office:

1. Produce all responsive records without further delay;
2. Provide a written explanation identifying the legal authority for any withheld or redacted material; and
3. Provide a specific estimated date of production if additional time is necessary.

If the requested records are not produced, or if a legally sufficient response is not provided, I reserve all rights available under Louisiana law, including the right to seek judicial enforcement pursuant to La. R.S. 44:35.

Sincerely,

Margot Marks
Staff Organizer, UTNO
3401 Canal St, NO, LA
Marks@utno.org

April 27th, 2026

Via mmarks@utno.org

Custodian of Records
Lycée Français Internationale de la Louisiane
1601 Leonidas Street, NO, LA
PublicRecordsRequest@lfno.org

Re: Deficient Response to Public Records Request Dated March 20, 2026

Dear Mr. Reid

I am in receipt of your correspondence of March 30, 2026, which serves as a response to my request of March 20, 2026, requesting the production of the following:

UTNO General Financials¹

Pursuant to *La RS 44:32*, custodians must either produce available records immediately, or within 5 business days, respond to the request, providing an “estimate of the time reasonably necessary for collection, segregation, redaction, examination, or review of a records request.” *Stevens v. St. Tammany Parish Government*, 2018264, (La.App. 1 Cir. 7/18/18), So.3d 456.

The aforementioned correspondence does not comply with Louisiana law as it does not provide notice of an expected date of production. *Stevens v. St. Tammany Parish Government*, 2018264, (La.App. 1 Cir. 7/18/18), So.3d 456. When the custodian fails to provide that notice, the requesting party may institute proceedings for the issuance of a writ of mandamus, injunctive, or declaratory relief. La.R.S. 44:35(A), *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, (La.App. 1 Cir. 11/15/15).

Additionally, upon information and belief, the requested documents do not contain personally identifying information or, at most, contain only minimal personally identifying information. For this reason, the stated justification for the delay—namely, the “time required for necessary redactions to protect our employees’ or students’ privacy in accordance with state law”—appears to be “without reason,” particularly given the failure to provide an expected date of production. *Aswell v. Division of Admin., State*, 902015-1851, (La.App. 1 Cir. 6/3/16), 196 So.3d.

¹ Please refer to Request For Public Records dated March 20, 2026.

Lee Reid, Esq.

Page 2 of 2

Last, to the extent possible, documents should be produced in the requested format. The correspondence of March 30, does not acknowledge that production was requested in electronic format. If the documents are available electronically, Lycee should only charge for the cost of transmission. *See AG Opinion No. 15-0056.*

More than 30 days have passed since the date the request was made. To date, we have not received any further communication from your office in connection with this request. Accordingly, please respond to the issues discussed herein, including an expected date of production. If additional time is needed for production, please detail the justification for any further delay with the required notice under La.R.S. 44:35(A).

Sincerely,

Margot Marks
Staff Organizer, UTNO
3401 Canal St, NO, LA
Marks@utno.org

5/28/26, 5:40 PM

United Teachers of New Orleans Mail - Public Records Request - UTNO - Colorado Retreat Expenses

**United Teachers
of New Orleans**

Margot Marks <mmarks@utno.org>

Public Records Request - UTNO - Colorado Retreat Expenses

2 messages

Margot Marks <mmarks@utno.org>

Fri, Mar 20, 2026 at 12:43 PM

To: "publicrecordsrequest@lfno.org" <PublicRecordsRequest@lfno.org>, dhenry@slh-law.com

Dear Records Custodian,

Please find attached my Public Records Request form, entitled "PRR form - UTNO - Colorado Retreat Expenses," and the additional attachment, "PRR - UTNO - Vendor List," regarding the request for specific financial records.

If you need additional information to process this request, please let me know.

Thank you for your time and attention.

Cordially,
Margot Marks

—
Margot Marks (she/her)
Staff Organizer
United Teacher of New Orleans
(504) 339-9591

2 attachments **PRR - UTNO - Colorado Retreat Expenses.pdf**
65K **PRR form - UTNO - Colorado Retreat Expenses.pdf**
235K**Margot Marks** <mmarks@utno.org>

Fri, Mar 27, 2026 at 11:14 AM

To: "publicrecordsrequest@lfno.org" <PublicRecordsRequest@lfno.org>, dhenry@slh-law.com

Dear Records Custodian,

I am writing to follow up on my Public Records Request dated Friday March 20th, regarding "Colorado Expenses" which I submitted pursuant to La. R.S. 44:1 et seq.

As of today, I have not received a response.

Under La. R.S. 44:32(D), a response is required within **three business days** of receipt of the request. This response must either include production of the requested records or a written determination outlining the basis for any delay or denial.

Given that this statutory deadline has passed, I respectfully request an immediate update on the status of my request, including:

- Confirmation of receipt of the request
- The anticipated date and time for production of responsive records
- Any applicable exemptions being asserted, if relevant

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

5/28/26, 5:40 PM

United Teachers of New Orleans Mail - Public Records Request - UTNO - Colorado Retreat Expenses

If the requested records are not currently available, please provide the written certification and timeline required under La. R.S. 44:33.

I appreciate your prompt attention to this matter and look forward to your response.

Cordially,
Margot Marks

[Quoted text hidden]

4/27/2026

Via mmarks@utno.org

Custodian of Records
Lycée Français Internationale de la Louisiane
1601 Leonidas Street, NO, LA
PublicRecordsRequest@lfno.org

Re: Deficient Response to Public Records Request Dated March 20, 2026

Dear Mr. Reid

I am in receipt of your correspondence of March 30, 2026, which serves as a response to my request of March 20, 2026, requesting the production of the following:

Vendor List¹

Pursuant to *La RS 44:32*, custodians must either produce available records immediately, or within 5 business days, respond to the request, providing an “estimate of the time reasonably necessary for collection, segregation, redaction, examination, or review of a records request.” *Stevens v. St. Tammany Parish Government*, 2018264, (La.App. 1 Cir. 7/18/18), So.3d 456.

The aforementioned correspondence does not comply with Louisiana law as it does not provide notice of an expected date of production. *Stevens v. St. Tammany Parish Government*, 2018264, (La.App. 1 Cir. 7/18/18), So.3d 456. When the custodian fails to provide that notice, the requesting party may institute proceedings for the issuance of a writ of mandamus, injunctive, or declaratory relief. La.R.S. 44:35(A), *Krielow v. Louisiana State University Board of Supervisors*, 2019-0176, (La.App. 1 Cir. 11/15/15).

Additionally, upon information and belief, the requested documents do not contain personally identifying information or, at most, contain only minimal personally identifying information. For this reason, the stated justification for the delay—namely, the “time required for necessary redactions to protect our employees’ or students’ privacy in accordance with state law”—appears to be “without reason,” particularly given the failure to provide an expected date of production. *Aswell v. Division of Admin., State*, 902015-1851, (La.App. 1 Cir. 6/3/16), 196 So.3d.

¹ Please refer to Request For Public Records dated March 20, 2026.

Lee Reid, Esq.

Page 2 of 2

Last, to the extent possible, documents should be produced in the requested format. The correspondence of March 30, does not acknowledge that production was requested in electronic format. If the documents are available electronically, Lycee should only charge for the cost of transmission. *See AG Opinion No. 15-0056.*

More than 30 days have passed since the date the request was made. To date, we have not received any further communication from your office in connection with this request. Accordingly, please respond to the issues discussed herein, including an expected date of production. If additional time is needed for production, please detail the justification for any further delay with the required notice under La.R.S. 44:35(A).

Sincerely,

Margot Marks
Staff Organizer, UTNO
3401 Canal St, NO, LA
Marks@utno.org



Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

July 6, 2026

VIA EMAIL
Margot Marks
mmarks@utno.org

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your request, dated March 20, 2026, wherein you request certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.* Specifically, you requested: (1) the Preferred Vendor List for fiscal years 2024, 2025, and 2026, including for each vendor the name, contract start and end dates, and total amount paid in the associated fiscal year; and (2) the Approved Vendor List for fiscal years 2024, 2025, and 2026.

After a diligent search, Lycée Français International de la Louisiane has determined that there are no documents responsive to your request. Lycée Français International de la Louisiane does not maintain preferred vendor lists or approved vendor lists.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid



Lee C. Reid
Partner
701 Poydras Street, Suite 4500
New Orleans, LA 70139
E: Lee.Reid@arlaw.com
O: 504.581.3234

August 26, 2026

VIA EMAIL
Margot Marks
mmarks@utno.org

Re: **PUBLIC RECORDS REQUEST**

Dear Ms. Marks:

I write to you on behalf of Lycée Français International de la Louisiane in response to your request, dated March 19, 2026, wherein you requested certain documents pursuant to the Louisiana Public Records Act ("LPRA"), La. Rev. Stat. Ann. § 44:1, *et seq.*

You requested all communications between Adams & Reese and specified CODOFIL-affiliated individuals. After a diligent search, Lycée Français International de la Louisiane has determined that there are no non-privileged documents responsive to this request.

Sincerely,

/s/ Lee C. Reid

Lee C. Reid

Income Statement**Lycée Français de la Nouvelle-Orléans**

July 2025 through January 2026

	Year-To-Date	Annual
Income Statement	Actual	Budget
Revenue		
State and Local Revenue		
1994000 · Local MFP	3,922,741	6,554,549
1999100 · Before & Aftercare Income	0	8,568
3110000 · State MFP	2,666,506	4,368,801
3210000 · Restricted Special Education Grants	401	375
3220000 · Education Support Fund	9,169	0
3240000 · LA-4 State Revenue	118,296	314,268
3290000 · Other Restricted Revenues	332,996	400,386
Total State and Local Revenue	7,050,109	11,646,947
Federal Revenue		
4515000 · School Food Service	132,494	189,984
4531000 · IDEA, Part B	106,684	216,182
4532000 · IDEA, PreK	0	4,912
4535000 · Other Special Educ. Prog.	0	51,632
4541000 · Title I Revenue	166,230	383,160
4543000 · Direct Student Services	0	1
4547000 · Title III, Part A	8,340	11,067
4559000 · Other ESSA Programs	12,235	76,014
4590000 · Other Federal Funds	0	1
Total Federal Revenue	425,983	932,953
Private Grants and Donations		
1921000 · Unrestricted Contributions and Donations	3,920	150,000
1922000 · Restricted Contributions and Donations	0	75,000
Total Private Grants and Donations	3,920	225,000
Earned Fees		
1311000 · Pre-K 4 Tuition	147,960	342,500
1510000 · Interest On Investments	153,693	513
1610000 · Income From Meals	54,747	0
1760000 · Revenue from Student Activities	0	1,087
1993000 · Refund Of PY Expense-Refund of Prior Year's Expenditures	10,520	11,727
1999000 · Other Miscellaneous Revenues	2,241,459	215,365
Total Earned Fees	2,608,379	571,192
Total Revenue	10,088,391	13,376,091
Expenses		
Salaries		
1001460 · Salaries - Admin Enrichment	33,880	48,000
1112211 · Salaries - Academic Admin	98,260	86,000
1112212 · ESS Admin	104,083	91,500
1112400 · School Admin	264,208	397,000
1112410 · Principals	129,819	160,000
1112420 · Asst Principals	43,772	141,000
1112430 · CEO	241,846	367,950
1112610 · Salaries - Facilities Admin	64,700	163,900
1121105 · Kindergarten Teachers	188,794	263,390
1121110 · Elementary Teachers	685,532	1,114,032
1121130 · Secondary Teachers	722,040	1,144,661
1121210 · Special Education Teachers	314,592	461,204
1121220 · Salaries - Gifted and Talented	119,579	112,000
1121530 · PreK Teachers	170,368	278,156
1122252 · School library/media services	34,173	59,750
1132122 · Social Workers	86,632	113,000
1132143 · Salaries - School Psychologist	46,657	76,555
1142190 · Salaries - Parent Liason	30,667	50,000
1142400 · Secretarial	108,205	200,195
1151105 · Aides - Kindergarten	61,549	169,272
1151210 · Aides Special Education	274,628	418,488
1151530 · AidesPreK	98,400	104,000
1162620 · Salaries - Custodial	113,304	103,719



----- Forwarded message -----

From: Jack Pontin <Jack.Pontin@arlaw.com>
Date: Fri, Aug 28, 2026 at 4:12 PM
Subject: LFIL PRR - Audit
To: Margot Marks <mmarks@utno.org>
Cc: Lee Reid <Lee.Reid@arlaw.com>

Ms. Marks:

Please see attached final response letter to your March 20, 2026, request for documents.

Best,

JACK PONTIN

Associate

E: Jack.Pontin@arlaw.com
O: 504.585.0350
Adams & Reese, LLP
701 Poydras Street, Suite 4500
New Orleans, LA 70139



adamsandree.com

—
Margot Marks (she/her)
Staff Organizer
United Teacher of New Orleans
(504) 339-9591

 08-28-2026 LFIL Final Response - Marks PRR Audit.pdf
102K

----- Forwarded message -----

From: Jack Pontin <Jack.Pontin@arlaw.com>
Date: Mon, Aug 31, 2026 at 8:53 AM
Subject: RE: LFIL PRR - Audit
To: Colette Tippy <ctippy@utno.org>
Cc: Lee Reid <Lee.Reid@arlaw.com>

Good morning, Ms. Tippy:

We received your email requesting to view the documents requested through the Public Records Act by Ms. Margot Marks. However, please note that the public records request in question was submitted by Ms. Marks, not by you. As such, we are happy to accommodate Ms. Marks in reviewing the production responsive to her request. If you would like to review the documents, you will need to submit a separate public records request of your own.

Once you submit your request, we would be glad to arrange a time for you to come to our office and review the documents in person. We are currently available this afternoon, Thursday afternoon, and Friday morning. Please let us know which time works best for you, and we will confirm the details.

Jack

FILED

2026 OCT 13 A 09:15

CIVIL

DISTRICT COURT

From: Colette Tippy <ctippy@utno.org>
Sent: Sunday, August 30, 2026 7:18 PM
To: Jack Pontin <Jack.Pontin@arlaw.com>; Lee Reid <Lee.Reid@arlaw.com>
Subject: Fwd: LFIL PRR - Audit

Dear Jack and Lee,

I am available tomorrow to review the responsive documents. Please confirm time and location and who I should ask for to review them in person.

Colette Tippy
Organizing Director
United Teachers of New Orleans
(504) 881-6550

[Quoted text hidden]

Colette Tippy <ctippy@utno.org>
To: Jack Pontin <Jack.Pontin@arlaw.com>
Cc: Lee Reid <Lee.Reid@arlaw.com>
Bcc: andrea@wjpnola.org

Mon, Aug 31, 2026 at 10:26 AM

Dear Jack,

In every communication that Ms. Marks submitted, she indicated that she was requesting the information not as an individual, but on behalf of the United Teachers of New Orleans. I am prepared to come review the records today in my capacity as a representative of the United Teachers of New Orleans. I plan to be there at 1PM.

Thanks,

Colette Tippy
Organizing Director
United Teachers of New Orleans
(504) 881-6550

[Quoted text hidden]

FILED

2026 OCT 13 A 09:15

Margot Marks <mmarks@utno.org>
CIVIL

DISTRICT COURT

United Teachers
of New Orleans

Public Records Request - UTNO - Codofil Adams and Reese

Carrie Broussard <cbroussard@crt.la.gov>
To: Margot Marks <mmarks@utno.org>

Mon, Apr 20, 2026 at 4:47 PM

The responsive emails and corresponding attachments have been uploaded to the provided Google Drive.

From: Margot Marks <mmarks@utno.org>
Sent: Monday, April 20, 2026 3:59 PM
To: Carrie Broussard <cbroussard@crt.la.gov>
Subject: Re: RE: Public Records Request - UTNO - Codofil Adams and Reese

Hi Carrie,

You can use THIS LINK to deposit the documents. Thank you!

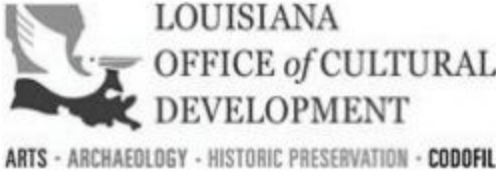
Best,
Margot

On Fri, Apr 17, 2026 at 1:02 PM Carrie Broussard <cbroussard@crt.la.gov> wrote:

The responsive records are ready to be released. Please send me a link to upload.

Carrie Broussard

Assistant Secretary
Office of Cultural Development | Department of Culture, Recreation & Tourism
225.342.8200 Main | 225.342.8181 Direct
Mail: P.O. Box 44247 | Baton Rouge, LA 70804
Visit: 1051 N. Third Street | Room 401 | Baton Rouge, LA 70802
cbroussard@crt.la.gov | www.crt.state.la.us/culture



FILED

2026 OCT 13 A 09:15

CIVIL

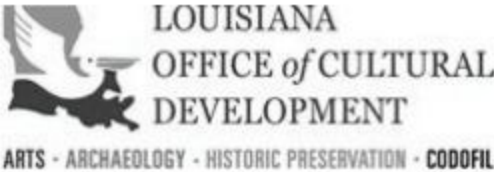
DISTRICT COURT

From: Carrie Broussard
Sent: Friday, April 10, 2026 2:27 PM
To: mmarks@utno.org
Subject: FW: RE: Public Records Request - UTNO - Codofil Adams and Reese

We have received your request and are working to compile the documents. I expect to have any records available for release by the end of next week.

Carrie Broussard

Assistant Secretary
Office of Cultural Development | Department of Culture, Recreation & Tourism
225.342.8200 Main | 225.342.8181 Direct
Mail: P.O. Box 44247 | Baton Rouge, LA 70804
Visit: 1051 N. Third Street | Room 401 | Baton Rouge, LA 70802
cbroussard@crt.la.gov | www.crt.state.la.us/culture



From: Public Records Requests <publicrecords@crt.la.gov>
Sent: Thursday, April 9, 2026 9:16 AM
To: mmarks@utno.org; Public Records Requests <publicrecords@crt.la.gov>
Cc: Carrie Broussard <cbroussard@crt.la.gov>
Subject: RE: Public Records Request - UTNO - Codofil Adams and Reese

Good morning, Ms. Marks.

On Wednesday, April 8, 2026, the Louisiana Department of Culture, Recreation & Tourism received your Public Records Request dated March 19, 2026.

The custodian of the records you have requested is Carrie Broussard, Assistant Secretary, Office of Cultural Development. She will be your point of contact for any questions, clarification, and the production of any records in the custody of this department that are responsive to your request.

Ms. Broussard will be able to provide you an estimate of the time reasonably necessary for collection, segregation, review, and redaction (if necessary), and the estimated cost for production of the requested records. (See R.S. 44:35 and R.S. 44:32(C)(2)(a)).

Thank you.

From: Margot Marks <mmarks@utno.org>
Sent: Wednesday, April 8, 2026 2:30 PM
To: Public Records Requests <publicrecords@crt.la.gov>
Subject: Fwd: Public Records Request - UTNO - Codofil Adams and Reese

Thank you for your response. Below is the PRR that was sent on 3/27/26.

Best,

Margot

Dear Records Custodian,

Please find attached my Public Records Request form, entitled "PRR - Codofil Adams and Reese - March 27th, 2026 regarding records of all communications between those two entities. If you need any additional information to process this request, please let me know.

Thank you for your time and attention.

Best,
Margot Marks

Disclaimer

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—

Margot Marks (she/her)
Staff Organizer
United Teacher of New Orleans
(504) 339-9591

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

CIVIL
DISTRICT COURT

AMERICAN FEDERATION OF TEACHERS 527
UNITED TEACHERS OF NEW ORLEANS

CIVIL ACTION NO. 2026-07757

Plaintiff

SECTION: N-13

V.

LYCÉE FRANÇAIS
INTERNATIONAL DE LA LOUISIANE

AND

DR. CHASE MCLAURIN IN HIS OFFICIAL
CAPACITY AS CUSTODIAN OF RECORDS

JUDGE SHERYL HOWARD

Defendants

FILED: _____

DEPUTY CLERK

ORDER

Considering the foregoing Amended Petition For Writ of Mandamus, pursuant to the Louisiana Public Records Act:

IT IS ORDERED that an Alternative Writ of Mandamus shall issue, directing Defendant, Dr. Chase McLaurin in his capacity as custodian of records for Defendant, LYCÉE FRANÇAIS INTERNATIONAL DE LA LOUISIANE, immediately produce or make the requested records available, or after the completion of discovery, show cause to the contrary at hearing.

NEW ORLEANS, LOUISIANA, this _____ day of _____, 2026.

JUDGE

PLEASE SERVE

Lycée Français International De La Louisiane
Through its Registered Agent, Dr. Chase McLaurin
1601 Leonidas Street
New Orleans, La 70118

Dr. Chase McLaurin, in His Official Capacity As Custodian Of Records,
1601 Leonidas Street
New Orleans, La 70118

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANACIVIL
DISTRICT COURTAMERICAN FEDERATION OF TEACHERS 527
UNITED TEACHERS OF NEW ORLEANS

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JUDGE SHERYL HOWARD

Defendants

FILED: _____

DEPUTY CLERK**PLAINTIFF'S FIRST SET OF INTERROGATORIES**

To: Dr. Chase McLaurin in his Official Capacity As Custodian Of Records
1601 Leonidas Street
New Orleans, La 70118

Pursuant to Article 1457, of the Louisiana Code of Civil Procedure, Plaintiff, American Federation of Teachers 527 (UTNO) propounds the following Interrogatories, to the Defendant, Dr. Chase McLaurin in his Official Capacity As Custodian Of Records to be answered fully, separately and completely, in writing and under oath, within the time delays allowed by law and served on undersigned counsel.

DEFINITIONS

1. All references to "Codofil Adams & Reese" include those records requested under the title Codofil Adams & Reese as described in Plaintiff's Amended Petition.
2. All references to "Earned Fees" include those records requested under the title Earned Fees as described in Plaintiff's Amended Petition.
3. All references to "General Financials" include those records requested under the title General Financials as described in Plaintiff's Amended Petition.
4. All references to "Colorado Retreat" include those records requested under the title Colorado Retreat as described in Plaintiff's Amended Petition.
5. All references to "Vendors List" include those records requested under the title Vendors List as described in Plaintiff's Amended Petition.
6. "You" shall mean Dr. Chase McLaurin along with your agents and representatives.

7. "Relating" shall mean in whole or in part and directly or indirectly referring to, concerning, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, or constituting.
8. "Documents" means and includes each and every medium upon which information is printed or can be printed, recorded or reproduced by mechanical means, by hand or by any other method, whether by you or by someone else, that is or has been in your possession, custody, or control or of which you have knowledge including, without limitation, invoices, financial statements, contracts, drawings, engineering studies, surveys, test results, test data, recommendations, opinions analyses, notes, records of contract, diaries, logs, plans, telephone records, cost estimates, correspondence, memoranda, stenographic or handwritten notes, minutes of meetings, reports, plans, studies, evaluations, projections, publications, books, pamphlets, pictures, photographs, films, E-mail, voice recordings, stenographic or tape or wire recordings, maps, surveys, charts, statistical data, work papers, data processing cards, computer records or printouts, agreements, telegraphs, summaries of telephone conversations, summaries or reports of investigations or negotiations, negatives, magnetic tapes, newspaper stories or clippings, drafts or any of the foregoing. Where copies of any documents are not identical to the original, each and every non-identical copy and the original are included within the meaning of documents. In addition, documents include every original or copy which is in your possession, care, custody or control and every original or copy to which you have access or the right to possession.
9. "And" as well as "or" should be construed either disjunctively or conjunctively, as necessary to bring within the scope of these requests any documents which might otherwise be construed to be outside their scope.

GENERAL INSTRUCTIONS

1. Each Interrogatory is continuing in nature; if additional responsive information or documents are discovered, supplement your responses.
2. **These Interrogatories do not seek any communications protected by attorney-client privilege.** If you object to or withhold any information responsive to these discovery requests under a claim of attorney-client privilege, work-product doctrine, or any other discovery privilege or protection, you are instructed to make such claim expressly pursuant to Louisiana Code of Civil Procedure Article 1424(C).
3. If you contend any requested information or document does not exist, state the efforts made to locate it and identify the person(s) most knowledgeable about the subject matter.
4. Unless otherwise specified, the relevant time period is March 1, 2026 through the present.

INTERROGATORIES**INTERROGATORY NO. 1**

Identify the records custodian(s) for Lycée Français International De La Louisiane.

INTERROGATORY NO. 2

Provide a chronological description of every step taken to search for records responsive to the request for Codofil Adams & Reese, including email, native files, and records on potential custodians' personal accounts and devices.

INTERROGATORY NO. 3

Provide a chronological description of every step taken to search for records responsive to the request for Earned Fees, including email, native files, and records on potential custodians' personal accounts and devices.

INTERROGATORY NO. 4

Provide a chronological description of every step taken to search for records responsive to the request for General Financials, including email, native files, and records on potential custodians' personal accounts and devices.

INTERROGATORY NO. 5

Provide a chronological description of every step taken to search for records responsive to the request for Colorado Retreat, including email, native files, and records on potential custodians' personal accounts and devices.

INTERROGATORY NO. 6

Explain in detail your internal practices or policies for handling public records requests.

INTERROGATORY NO. 7

Identify the name and title of each person or persons involved in responding to Plaintiff's request for Codofil Adams & Reese.

INTERROGATORY NO. 8

Identify the name and title of each person or persons involved in responding to Plaintiff's request for Earned Fees.

INTERROGATORY NO. 9

Identify the name and title of each person or persons involved in responding to Plaintiff's request for General Financials.

INTERROGATORY NO. 10

Identify the name and title of each person or persons involved in responding to Plaintiff's request for Colorado Retreat Expenses.

INTERROGATORY NO. 11

Identify the search terms used when searching for documents responsive to Plaintiff's request for Codofil Adams & Reese.

INTERROGATORY NO. 12

Identify the search terms used when searching for documents responsive to Plaintiff's request for Earned Fees.

INTERROGATORY NO. 13

Identify the search terms used when searching for documents responsive to Plaintiff's request for General Financials.

INTERROGATORY NO. 14

Identify the search terms used when searching for documents responsive to Plaintiff's request for Colorado Retreat.

DATED: OCTOBER 13, 2026

RESPECTFULLY SUBMITTED,

WORKPLACE JUSTICE PROJECT



Andrea M. Agee, LSBN 34887

andrea@wjpnoia.org

7600 Jeannette Street

New Orleans, La 70118

Telephone: (504) 266 0164

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANACIVIL
DISTRICT COURTAMERICAN FEDERATION OF TEACHERS 527
UNITED TEACHERS OF NEW ORLEANS

CIVIL ACTION NO. 2026-07757

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AND

DR. CHASE MCLAURIN IN HIS OFFICIAL
CAPACITY AS CUSTODIAN OF RECORDS

JUDGE SHERYL HOWARD

Defendants

FILED: _____

DEPUTY CLERK**PLAINTIFF'S REQUESTS FOR ADMISSIONS**

To: Dr. Chase McLaurin in his Official Capacity As Custodian Of Records
1601 Leonidas Street
New Orleans, La 70118

Pursuant to Article 1467, of the Louisiana Code of Civil Procedure, Plaintiff, American Federation of Teachers 527 (UTNO) propounds the following Requests For Admissions, to the Defendant, Dr. Chase McLaurin in his Official Capacity As Custodian Of Records, to be answered fully, separately and completely, in writing and under oath, within the time delays allowed by law and served on undersigned counsel.

DEFINITIONS

1. All references to "Plaintiff's Exhibit" include those exhibits attached to Plaintiff's Amended Petition unless otherwise stated.
2. All references to "Codofil Adams & Reese" include those records requested under the title Codofil Adams & Reese as described in Plaintiff's Amended Petition.
3. All references to "Earned Fees" include those records requested under the title Earned Fees as described in Plaintiff's Amended Petition.
4. All references to "General Financials" include those records requested under the title General Financials as described in Plaintiff's Amended Petition.
5. All references to "Colorado Retreat" include those records requested under the title Colorado Retreat as described in Plaintiff's Amended Petition.
6. All references to "Vendors List" include those records requested under the title Vendors List as described in Plaintiff's Amended Petition.
7. "You" shall mean Dr. Chase McLaurin along with your agents and representatives.

8. "Relating" shall mean in whole or in part and directly or indirectly referring to, concerning, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, or constituting.
9. "Documents" means and includes each and every medium upon which information is printed or can be printed, recorded or reproduced by mechanical means, by hand or by any other method, whether by you or by someone else, that is or has been in your possession, custody, or control or of which you have knowledge including, without limitation, invoices, financial statements, contracts, drawings, engineering studies, surveys, test results, test data, recommendations, opinions analyses, notes, records of contract, diaries, logs, plans, telephone records, cost estimates, correspondence, memoranda, stenographic or handwritten notes, minutes of meetings, reports, plans, studies, evaluations, projections, publications, books, pamphlets, pictures, photographs, films, E-mail, voice recordings, stenographic or tape or wire recordings, maps, surveys, charts, statistical data, work papers, data processing cards, computer records or printouts, agreements, telegraphs, summaries of telephone conversations, summaries or reports of investigations or negotiations, negatives, magnetic tapes, newspaper stories or clippings, drafts or any of the foregoing. Where copies of any documents are not identical to the original, each and every non-identical copy and the original are included within the meaning of documents. In addition, documents include every original or copy which is in your possession, care, custody or control and every original or copy to which you have access or the right to possession.
10. "And" as well as "or" should be construed either disjunctively or conjunctively, as necessary to bring within the scope of these requests any documents which might otherwise be construed to be outside their scope.

GENERAL INSTRUCTIONS

1. Unless otherwise specified, the relevant time period is March 1, 2026 through the present.
2. All references to "Plaintiff's Exhibit" include those exhibits attached to Plaintiff's Amended Petition unless otherwise stated.
3. These Requests For Admissions do not seek any communications protected by attorney-client privilege. If you object to or withhold any information responsive to these discovery requests under a claim of attorney-client privilege, work-product doctrine, or any other discovery privilege or protection, you are instructed to make such claim expressly pursuant to Louisiana Code of Civil Procedure Article 1424(C).

REQUESTS FOR ADMISSIONS**REQUEST NO. 1**

Admit that you first responded to the request for Codofil Adams & Reese on March 30, 2026.

REQUEST NO. 2

Admit that you first responded to the request for Earned Fees on March 30, 2026.

REQUEST NO. 3

Admit that you first responded to the request for General Financials on March 30, 2026.

REQUEST NO. 4

Admit that you first responded to the request for Colorado Retreat on March 30, 2026.

REQUEST NO. 5

Admit that Plaintiff's Exhibit F is a copy of your response to Plaintiff's request for "Codofil Adams & Reese."

REQUEST NO. 6

Admit that Plaintiff's Exhibit G is a copy of your response to Plaintiff's request for "Earned Fees."

REQUEST NO. 7

Admit that Plaintiff's Exhibit H is a copy of your response to Plaintiff's request for "General Financials."

REQUEST NO. 8

Admit that Plaintiff's Exhibit I is a copy of your response to Plaintiff's request for "Colorado Retreat."

DATED: OCTOBER 13, 2026

RESPECTFULLY SUBMITTED,

WORKPLACE JUSTICE PROJECT



Andrea M. Agee, LSBN 34887

andrea@wjpnoia.org

7600 Jeannette Street

New Orleans, La 70118

Telephone: (504) 266 0164

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANACIVIL
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CIVIL ACTION NO. 2026-07757

Plaintiff

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DR. CHASE MCLAURIN IN HIS OFFICIAL
CAPACITY AS CUSTODIAN OF RECORDS

JUDGE SHERYL HOWARD

Defendants

FILED: _____

DEPUTY CLERK**PLAINTIFF'S REQUESTS FOR PRODUCTION**

To: Dr. Chase McLaurin in his Official Capacity As Custodian Of Records
1601 Leonidas Street
New Orleans, La 70118

Pursuant to Article 1462, of the Louisiana Code of Civil Procedure, Plaintiff, American Federation of Teachers 527 (UTNO) propounds the following Requests For Production, to the Defendant, Dr. Chase McLaurin in his Official Capacity As Custodian Of Records, to be answered fully, separately and completely, in writing and under oath, within the time delays allowed by law and served on undersigned counsel.

DEFINITIONS

1. All references to "Plaintiff's Exhibit" include those exhibits attached to Plaintiff's Amended Petition unless otherwise stated.
2. All references to "Codofil Adams & Reese" include those records requested under the title Codofil Adams & Reese as described in Plaintiff's Amended Petition.
3. All references to "Earned Fees" include those records requested under the title Earned Fees as described in Plaintiff's Amended Petition.
4. All references to "General Financials" include those records requested under the title General Financials as described in Plaintiff's Amended Petition.
5. All references to "Colorado Retreat" include those records requested under the title Colorado Retreat as described in Plaintiff's Amended Petition.
6. All references to "Vendors List" include those records requested under the title Vendors List as described in Plaintiff's Amended Petition.

7. "You" shall mean Dr. Chase McLaurin along with your agents and representatives.
8. "Relating" shall mean in whole or in part and directly or indirectly referring to, concerning, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, or constituting.
9. "Documents" means and includes each and every medium upon which information is printed or can be printed, recorded or reproduced by mechanical means, by hand or by any other method, whether by you or by someone else, that is or has been in your possession, custody, or control or of which you have knowledge including, without limitation, invoices, financial statements, contracts, drawings, engineering studies, surveys, test results, test data, recommendations, opinions analyses, notes, records of contract, diaries, logs, plans, telephone records, cost estimates, correspondence, memoranda, stenographic or handwritten notes, minutes of meetings, reports, plans, studies, evaluations, projections, publications, books, pamphlets, pictures, photographs, films, E-mail, voice recordings, stenographic or tape or wire recordings, maps, surveys, charts, statistical data, work papers, data processing cards, computer records or printouts, agreements, telegraphs, summaries of telephone conversations, summaries or reports of investigations or negotiations, negatives, magnetic tapes, newspaper stories or clippings, drafts or any of the foregoing. Where copies of any documents are not identical to the original, each and every non-identical copy and the original are included within the meaning of documents. In addition, documents include every original or copy which is in your possession, care, custody or control and every original or copy to which you have access or the right to possession.
10. "And" as well as "or" should be construed either disjunctively or conjunctively, as necessary to bring within the scope of these requests any documents which might otherwise be construed to be outside their scope.

GENERAL INSTRUCTIONS

1. Each Request For Production is continuing in nature; if additional responsive information or documents are discovered, supplement your responses.
2. **These Requests For Production do not seek any communications or document protected by attorney-client privilege.** If you object to or withhold any document or information responsive to these discovery requests under a claim of attorney-client privilege, work-product doctrine, or any other discovery privilege or protection, you are instructed to make such claim expressly pursuant to Louisiana Code of Civil Procedure Article 1424(C).
3. Unless otherwise specified, the relevant time period is March 1, 2026 through the present.
4. If any document identified has been destroyed, describe in detail the circumstances of and reasons for such destruction and to produce all documents which relate to the circumstances and/or the reasons for such destruction.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO.1

Produce all communications, including email and texts, which describe your efforts to search for documents responsive to Plaintiff's request for Codofil Adams & Reese.

REQUEST FOR PRODUCTION NO.2

Produce all communications, including email and texts, which describe your efforts to search for documents responsive to Plaintiff's request for Earned Fees.

REQUEST FOR PRODUCTION NO.3

Produce all communications, including email and texts, which describe your efforts to search for documents responsive to Plaintiff's request for General Financials.

REQUEST FOR PRODUCTION NO.4

Produce all communications, including email and texts, regarding your efforts to search for documents responsive to Plaintiff's request for Colorado Retreat.

REQUEST FOR PRODUCTION NO.5

Produce all financial statements reviewed when searching for documents responsive to Plaintiff's request for Earned Fees.

REQUEST FOR PRODUCTION NO.6

Produce all financial statements reviewed when searching for documents responsive to Plaintiff's request for General Financials.

DATED: OCTOBER 13, 2026

RESPECTFULLY SUBMITTED,

WORKPLACE JUSTICE PROJECT



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