



# Record Correction Request

JES-RR-001 - Nov. 15 electronic complaint submission and HOMS reporting route

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|--|--|
| <b>Date submitted</b>                    | June 10, 2026  |
| <b>Correction determination deadline</b> | July 10, 2026  |
| <b>Deadline basis</b>                    | MGDPA correction determination deadline: 30 calendar days                                  |
| <b>Sender</b>                            | [REDACTED]   |
| <b>Recipient</b>                         | Responsible Authority / Data Practices Compliance Official, Prior Lake-Savage Area Schools |
| <b>Scope</b>                             | JES-RR-001 - Nov. 15 electronic complaint submission and HOMS reporting route              |

This cover page is an index aid. The formal request body follows on the next page and controls the specific scope, authorities invoked, and requested action.

Dear Responsible Authority / Data Practices Compliance Official:

This is a formal written challenge to the accuracy and completeness of maintained data under Minnesota Statutes section 13.04, subdivision 4. To the extent the challenged records are education records directly related to my child and maintained by the District or a party acting for it, this is also a FERPA request to amend inaccurate, misleading, or privacy-violating education records under 34 CFR 99.20.

I am the parent of the minor student/data subject, [REDACTED] [REDACTED] I also challenge any data maintained about myself, [REDACTED] [REDACTED] in the records identified below.

This request concerns the District's maintained records and later productions involving Joseph Kuboushek's November 15, 2024 email in the `Re: [REDACTED] ipad` thread, after I reported that I was unable to forward the original complaint chain electronically.

## Summary Of Requested Action

Please correct, complete, or supplement the maintained records identified below. If the District determines that any challenged data are correct and complete, please provide a written determination explaining the basis for that decision and the appeal-right notice required by Minn. Stat. section 13.04, subdivision 4. For FERPA-covered education records, if the District declines to amend the record as requested, please also provide the FERPA hearing-right notice required by 34 CFR 99.20 and 34 CFR 99.21.

While this challenge is pending, please do not disclose the disputed data unless my statement of disagreement accompanies the disclosure.

## Challenged Record 1: No Electronic Submission Suggestion / Hard-Copy Workaround

- Record locator: November 15, 2024 Joseph Kuboushek email titled `Re: [REDACTED] ipad`, produced in `Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt`, lines 318-333; Gmail message `193318d1d1243e1c`, thread `19330c55b57ca394`.

- Challenged statement/data: After I reported that I was unable to forward the original complaint chain electronically, Joe stated: "I am sorry, but I don't have any suggestions about being able to send this message to me electronically. If you are willing, you can certainly send me a hard copy to view."

- Nature of disagreement: The maintained record is materially incomplete and misleading because it treats a blocked electronic complaint/reporting route as something the parent must work around with hard copy, rather than as a District-controlled reporting-access problem requiring repair, escalation, or identification of a working electronic complaint path. Internet Archive captures show that the Hidden Oaks Middle School public website carried a `Confidential Reporting Form` link before and after the November 15 email, including September 4, November 23, November 24, 2024 and January 20, 2025. The linked Google Forms route was later observed as deleted/inaccessible in February 2025. Either way, the District's response should not be maintained as "no suggestions / hard copy" without correction or source-record accounting.

- Supporting evidence: `JES-EX-001` through `JES-EX-004` in the attached exhibit packet; local correction point `JES-001`; Internet Archive captures of `https://homs.plsas.org/support/student-services/academic-support`; February 2025 HOMS form screenshots and OCR sidecars; District policy snapshot showing reporting-form infrastructure.

- Requested correction: Correct or supplement the record to state that the failed electronic transmission of the formal complaint required District action to identify or repair a working electronic reporting/submission path. If the HOMS form worked, the District should have identified it. If the HOMS form was broken, disabled, deleted, misconfigured, inaccessible, or unmonitored, the District should have escalated repair and provided a working alternate electronic route. If the District maintains the HOMS route was unavailable, inapplicable, or not maintained on November 15, 2024, identify the source records supporting that position.
- Prior recipients to notify: Any District, Board, agency, counsel, investigator, administrator, or third-party recipient to whom the District disclosed or relied on the unqualified no-electronic-help / hard-copy framing.

## Challenged Record 2: Peterson Mailbox Search Scope / District-System Nonreceipt

- Record locator: November 15, 2024 Joseph Kuboushek email titled `Re: [REDACTED] ipad`, produced in `Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt`, lines 324-328.
- Challenged statement/data: Joe stated that after talking with Scott Peterson and contacting Technology, an electronic search of Peterson's email did not locate my email to Peterson.
- Nature of disagreement: The sentence may be literally true if limited to a mailbox search of Peterson's email. It is materially incomplete and misleading if maintained or later used to imply that the original complaint did not enter District systems, that no District-controlled source records existed, or that a Peterson-mailbox search was equivalent to a Google Admin, quarantine, security, routing, email-log, or Vault/source-record search. Later District records describe an audit/quarantine account in which the November 1 / November 4 chain entered District-controlled systems, generated the School Board auto-reply, and was filtered or quarantined before delivery to individual `@plsas.org` inboxes.
- Supporting evidence: `JES-EX-001` and `JES-EX-005`; local correction point `JES-002`; related Nov. 20 correction point `N20-001`.
- Requested correction: Correct or supplement the maintained record to identify what system was searched on November 15, who performed the search, what account/date range/query/search terms were used, whether quarantine/security/filtering logs were searched, whether the search was limited to Peterson's mailbox, how the later audit/quarantine position reconciles with the mailbox-search result, and where the underlying audit/log/original-message/quarantine records were produced, withheld, no-recorded, expired/deleted, or otherwise accounted for.
- Prior recipients to notify: Any recipient of a record using the Peterson-mailbox search to support District-system nonreceipt, first-receipt, no-duty, or no-records conclusions.

## Challenged Record 3: Original Email Blocked / Never Received Speculation

- Record locator: November 15, 2024 Joseph Kuboushek email titled `Re: [REDACTED] ipad`, produced in `Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt`, lines 330-331.
- Challenged statement/data: Joe stated that he was "wondering if your original email was also blocked and never received by Mr. Peterson."
- Nature of disagreement: The statement was framed as speculation on November 15, so this request does not claim Joe could not wonder about a possible technical explanation at that time. The accuracy/completeness problem arises when the District maintains or later uses that speculation as a blocked/nonreceipt or first-receipt premise without producing the source records needed to support it. When I know an email was blocked, the record includes non-delivery notifications, including the November 15 blocked sends. No non-delivery notifications have been identified for the November 1 or November 4 sends. The November 4 School Board auto-reply represented

receipt through the Board route. Despite multiple requests for logs/audits and District finality/completeness positions, the represented production universe does not include a log showing the November 1 or November 4 emails were blocked, nor the audit Joe later described.

- Supporting evidence: `JES-EX-001`, `JES-EX-005`, and related `N20-001` delivery/audit source mapping.
- Requested correction: Strike or qualify any maintained use of the November 15 speculation as a blocked/nonreceipt fact. The District should either correct the record to state that the November 1 / November 4 email chain entered District-controlled Board routing and was received as represented by the existing Board auto-reply, while any claim about individual mailbox delivery remains channel-specific and source-limited, or produce/identify the delivery logs, quarantine/security records, audit record, message headers, group-routing records, or other source records supporting the District's position that the November 1 / November 4 emails were blocked or never received.
- Prior recipients to notify: Any recipient of a later first-receipt, nonreceipt, quarantine, block, or no-duty framing that depends on this speculation.

## Attached Exhibit Packet

This request is supported by the attached Bates-stamped exhibit packet, `JES-RR-001 Exhibit Packet`, Bates range `JES-0001` forward. The packet includes a clickable index and highlighted source excerpts so the disputed data and omitted context are visible without relying on inference.

- `JES-EX-001`: November 15 Joe email containing the three challenged statements.
- `JES-EX-002`: Wayback HOMS Academic Support captures showing the Confidential Reporting Form link before and after November 15.
- `JES-EX-003`: February 2025 HOMS screenshot/OCR sidecars showing the public form link and deleted Google Form result.
- `JES-EX-004`: District policy/reporting-form infrastructure snapshot.
- `JES-EX-005`: Nov. 20 delivery/audit posture and source-record cure context.

## Records And Source Basis Requested With This Correction

To resolve the accuracy and completeness issues above, please produce, identify as withheld with a specific basis, or state that no responsive data are maintained for the following source records:

1. Records showing the HOMS Confidential Reporting Form status on November 15, 2024, including owner, Google Form file status, deletion/disablement history, access settings, form responses/monitoring, Finalsite/CMS link history, helpdesk/repair/escalation records, and any records showing why the route was unavailable, inapplicable, or not identified.
2. District and school electronic complaint/reporting route inventories active on November 15, 2024, including HOMS, Policy 103, Title IX, bullying, harassment/violence, maltreatment, safety/discipline, Policy 413, Policy 521, and Policy 526 routes.
3. Records showing the scope of the November 15 Peterson email search, including who searched, system searched, search terms, date range, account searched, results, and whether quarantine/security/log records were included.

4. The email systems audit referenced in later District records, including Google Admin/Vault/email-log exports, quarantine/security-action records, School Board group auto-reply/routing records, original message/quarantine objects, and mailbox-delivery records for the November 1, November 4, and November 15 messages.
5. Non-delivery notifications, bounceback records, message headers, delivery events, rejection notices, quarantine notices, filtering logs, or no-records/finality statements for the November 1 and November 4 messages and the November 15 forwarding attempts.
6. Any records supporting the District's position that **no response was legally required** after it received notice that an electronic complaint/reporting route was blocked or inaccessible.

If any of these source-record categories are absent from the District's maintained or represented production universe, please state that expressly and correct any maintained statement that depends on the absent source basis.

## **Deadline And Response Requirements**

Under Minn. Stat. section 13.04, subdivision 4, the responsible authority must correct inaccurate or incomplete data or notify me that the District has determined the data are correct within 30 days of receipt. If received on June 10, 2026, the correction determination deadline is July 10, 2026.

If the District denies any correction, please provide the written reasons for that determination, the required appeal-right notice, and the FERPA hearing-right notice for education records. If the District completes or corrects the data, please identify the corrected record, the correction made, and the past recipients the District attempted to notify.

Sincerely,

[REDACTED]

[REDACTED]

# JES-RR-001 Exhibit Packet

Source excerpts and highlighted records supporting the Nov. 15 electronic-submission correction request.

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| Exhibit    | Bates link               | Bookmark label                                       | Source   | Why relevant   |
|------------|--------------------------|--|--|--|
| JES-EX-001 | <a href="#">JES-0004</a> | JES-EX-001 - Nov. 15 Joe email challenged statements | plsas_pst/attachments/district/emily_Herman_2025-01-27 [REDACTED] Data Request File 1 (1).ines 318-333 | Contains the three challenged statements: Peterson mailbox search, original-email blocked speculation, and no electronic-submission suggestion / hard-copy workaround. |
| JES-EX-002 | <a href="#">JES-0005</a> | JES-EX-002 - Wayback HOMS form-link bracket          | Internet Archive captures of https://homs.plsas.org/support/student-services/academic-support          | Shows the HOMS public page carried a Confidential Reporting Form link before and after the Nov. 15 Joe email.  |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# JES-RR-001 Exhibit Packet

Source excerpts and highlighted records supporting the Nov. 15 electronic-submission correction request.

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| Exhibit    | Bates link               | Bookmark label   | Source   | Why relevant  |
|------------|--------------------------|--|--|---|
| JES-EX-003 | <a href="#">JES-0006</a> | JES-EX-003 - HOMS link and deleted-form screenshot OCR     | February 2025 HOMS screenshot OCR sidecars                     | Shows the later public-facing Confidential Reporting Form link and the deleted/inaccessible Google Form result. |
| JES-EX-004 | <a href="#">JES-0007</a> | JES-EX-004 - District policy reporting-form infrastructure | PLSAS Board Policies public snapshot, local capture 2026-06-01 | Shows District maintained public reporting-form infrastructure in the policy universe.                          |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# JES-RR-001 Exhibit Packet

Source excerpts and highlighted records supporting the Nov. 15 electronic-submission correction request.

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| Exhibit    | Bates link               | Bookmark label                                | Source  | Why relevant   |
|------------|--------------------------|---|---|--|
| JES-EX-005 | <a href="#">JES-0008</a> | JES-EX-005 - Nov. 20 audit/nonreceipt posture | N20-001 delivery/first-receipt correction workspace and source evidence | Shows the later audit/quarantine posture that must be reconciled with the Nov. 15 mailbox-search and blocked/nonreceipt speculation. |

Visible Bates page numbers are clickable links to the first page of each exhibit.

JES-0003

## JES-EX-001 - Nov. 15 Joe Email Challenged Statements

Source: Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt, lines 318-333

318: CC: Katie Haycraft <khaycraft@plsas.org>; [REDACTED]  
[REDACTED]; Scott Peterson  
319: <speterson@plsas.org>; John Dahl <jdahl@plsas.org>; Michael Thomas <mthomas@plsas.org>;  
schoolboard@plsas.org  
320: <schoolboard@plsas.org>  
321: Subject: Re: [REDACTED] ipad  
322: Hi [REDACTED]  
323:  
324: Thank you for reaching out separately letting me know you have been unable to forward me  
your original email chain.  
325:  
326: Earlier today I talked with Mr. Peterson about your email and he told me he did not  
receive an email for you. We followed up  
327: this conversation by contacting our technology department. After an electronic search of  
his email, we were unable to find  
328: an email from you to Mr. Peterson.  
329:  
330: I am wondering if your original email was also blocked and never received by Mr.  
Peterson.  
331:  
332: I am sorry, but I don't have any suggestions about being able to send this message to me  
electronically. If you are willing,  
333: you can certainly send me a hard copy to view.

Related later preserved complaint context, same source, lines 4304-4308:

4304: Title IX requires accessible reporting mechanisms, including electronic submission...  
4305: When notified that a Title IX complaint was blocked, Joe's response stating, "I am  
sorry, but I don't have any suggestions  
4306: about being able to send this message to me electronically. If you are willing, you can  
certainly send me a hard copy to view,"  
4307: demonstrates deliberate indifference and imposes unnecessary barriers to filing  
complaints electronically.

## JES-EX-002 - Wayback HOMS Confidential Reporting Form Link

Source: Internet Archive CDX and captures for <https://homs.plsas.org/support/student-services/academic-support>

CDX 200-status captures in relevant period:

- 2024-07-20 13:33:15
- 2024-09-04 13:28:07
- 2024-11-23 09:04:35
- 2024-11-24 15:30:20
- 2025-01-20 23:12:43

Capture review found the page included a Resources navigation link labeled Confidential Reporting Form.

Extracted target:

<https://docs.google.com/forms/d/e/1FAIpQLSdbvdMKmQT-LMe0mlFtK-NkhCNIqsqZG3qEXzQhKJAQJtN63g/viewform?c=0&w=1>

Key capture URLs:

[https://web.archive.org/web/20240904132807id\\_/https://homs.plsas.org/support/student-services/academic-support](https://web.archive.org/web/20240904132807id_/https://homs.plsas.org/support/student-services/academic-support)  
[https://web.archive.org/web/20241123090435id\\_/https://homs.plsas.org/support/student-services/academic-support](https://web.archive.org/web/20241123090435id_/https://homs.plsas.org/support/student-services/academic-support)  
[https://web.archive.org/web/20241124153020id\\_/https://homs.plsas.org/support/student-services/academic-support](https://web.archive.org/web/20241124153020id_/https://homs.plsas.org/support/student-services/academic-support)  
[https://web.archive.org/web/20250120231243id\\_/https://homs.plsas.org/support/student-services/academic-support](https://web.archive.org/web/20250120231243id_/https://homs.plsas.org/support/student-services/academic-support)

Use: This brackets the November 15, 2024 Joe email. If the form worked, the District should have identified it as an electronic reporting route. If it was broken, the District should have repaired/escalated and provided a working alternate electronic route.

## JES-EX-003 - Feb. 2025 HOMS Link And Deleted Form Result

Source 1: [REDACTED] [REDACTED] 2025-02-16\_Screenshot showing confidential reporting form link on hidden website as of 2-14-25.txt

10: Academic Support - Hidden Oaks Middle School - <https://homs.plsas.org/support/student-services/academic-support>

12: Confidential Reporting Form

28: <a href="https://docs.google.com/forms/d/e/1FATpOLSdbvdMKmOT- ...

29: LMe@m1 FtK-NkhCNTqsqZG3qfXz 0hKIJAQJtN63g/viewform?c=08i=1" ...

31: Confidential Reporting Form

Source 2: [REDACTED] [REDACTED] 2025-02-16\_Screenshot showing page users are brought to when clicking confidential reporting form link.txt

7: Google Drive

8: Sorry, the file you have requested has been deleted.

9: Make sure that you have the correct URL and the owner of the file hasn't deleted it.

## JES-EX-004 - District Reporting Form Infrastructure

Source: PLSAS Board Policies public snapshot, local capture 2026-06-01  
record-correction/dr\_jan24\_drthomasresponse/evidence/public\_search\_snapshots/DRT-FU-001\_2026-06-01/PLSAS\_Board\_Policies.html

770: <td><a data-file-name="413\_-\_Harassment\_and\_Violence.docx.pdf"  
href="/uploaded/School\_Board/Policies/400/413\_-\_Harassment\_and\_Violence.docx.pdf"  
target="\_blank">Harassment and Violence&nbsp;</a><br />

771: Reporting Form at end of policy 413</td>

931: <a data-file-name="Section\_504\_Procedural\_Safeguards.pdf"  
href="/uploaded/School\_Board/Policies/500/Section\_504\_Procedural\_Safeguards.pdf"  
target="\_blank">Procedural Safeguards</a><br />

932: <a data-file-name="521\_Reporting\_Form.pdf"  
href="/uploaded/School\_Board/Policies/500/521\_Reporting\_Form.pdf" target="\_blank">Reporting  
Form</a></td>

956: <td><a data-file-name="526\_-\_Hazing\_Prohibition.docx.pdf"  
href="/uploaded/School\_Board/Policies/500/526\_-\_Hazing\_Prohibition.docx.pdf"  
target="\_blank">Hazing Prohibition</a><br />

957: <a data-file-name="Reporting\_Form.pdf"  
href="/uploaded/School\_Board/Policies/500/Reporting\_Form.pdf" target="\_blank">Reporting  
Form</a></td>

## JES-EX-005 - Nov. 20 Audit/Nonreceipt Posture

Source: record-correction/rc\_nov20\_joe\_emily\_meeting\_request/N20-001-delivery-first-receipt-timeline/CORRECTION.md

### Target statement summary:

The Nov. 20 Joe/Emily email states that the Nov. 1 original email and Nov. 4 follow-up were filtered/quarantined, that the School Board auto-reply was sent as the email entered the system, that the original email chain was not delivered to any staff member's @plsas.org email account, and that the initial communication received regarding the sexual-abuse allegations was not received until Friday, Nov. 15 when screenshots were forwarded.

### Vulnerability summary:

The statement is materially incomplete and misleading if maintained as an unqualified Nov. 15 first-receipt timeline. The same email concedes the chain entered District-controlled systems and generated the School Board auto-reply. The Nov. 4 Gmail print preserves the Board auto-reply stating all School Board Directors received the email and that the Chair/designee would respond or may route it to an administrator.

### Cure/source records requested in N20-001:

- email systems audit records;
- Google Admin/Vault/email-log exports;
- quarantine/filter/security-action records;
- group/School Board auto-reply routing records;
- original message/quarantine objects and metadata;
- records showing which recipients, groups, or systems received, processed, opened, quarantined, forwarded, or failed to deliver the chain;
- withholding, noncontrol, retention, or no-records basis for any missing category.

### JES-003 cross-link:

Known blocked sends in this episode produced non-delivery notifications; no comparable Nov. 1 or Nov. 4 non-delivery notification has been identified in the represented record universe.



# Record Correction Request

N20-RR-001 Nov. 20 Meeting Request and Participation-Framing Records

|  |  |
|--|--|
| <b>Date submitted</b>                    | June 9, 2026   |
| <b>Correction determination deadline</b> | July 9, 2026   |
| <b>Deadline basis</b>                    | MGDPA correction determination deadline: 30 calendar days            |
| <b>Sender</b>                            | [REDACTED]   |
| <b>Recipient</b>                         | Responsible Authority / Data Practices Compliance Official, ISD 719  |
| <b>Scope</b>                             | N20-RR-001 Nov. 20 Meeting Request and Participation-Framing Records |

This cover page is an index aid. The formal request body follows on the next page and controls the specific scope, authorities invoked, and requested action.

Dear Responsible Authority / Data Practices Compliance Official:

This is a formal written challenge to the accuracy and completeness of maintained data under Minnesota Statutes section 13.04, subdivision 4. To the extent the challenged records are education records directly related to my child and maintained by the District or a party acting for it, this is also a FERPA request to amend inaccurate, misleading, or privacy-violating education records under 34 CFR 99.20.

I am the parent of the minor student/data subject, [REDACTED] I also challenge any data maintained about myself, [REDACTED] in the records identified below.

This request concerns the District's maintained records and later productions involving the November 20, 2024 "Meeting Request" response and related records that repeat or rely on the same factual framing.

## Summary Of Requested Action

Please correct, complete, or supplement the maintained records identified below. If the District determines that any challenged data are correct and complete, please provide a written determination explaining the basis for that decision and the appeal-right notice required by Minn. Stat. section 13.04, subdivision 4. For FERPA-covered education records, if the District declines to amend the record as requested, please also provide the FERPA hearing-right notice required by 34 CFR 99.20 and 34 CFR 99.21.

While this challenge is pending, please do not disclose the disputed data unless my statement of disagreement accompanies the disclosure.

## Challenged Record 1: November 20 First-Receipt / Delivery Timeline

- Record locator: November 20, 2024 email titled "Meeting Request," sent by Joe Kuboushek / Emily Herman; Compliance Theater case file `13`.

- Challenged statement/data: The email states that the November 1 original email and November 4 follow-up were filtered/quarantined, that the School Board auto-reply was generated as the email entered the system, that the original email chain was not delivered to any `@plsas.org` inboxes, and that the initial communication received regarding the sexual-abuse allegations was not received until November 15 when screenshots were forwarded.

- Nature of disagreement: The statement is materially incomplete and misleading if maintained as an unqualified November 15 first-receipt timeline. The same email concedes the chain entered District-controlled systems and generated the School Board auto-reply. The November 4 Board auto-reply represented that all School Board Directors received the email and that the Chair/designee may respond or route it to an administrator. The maintained record must distinguish system entry, Board/group receipt, auto-reply/routing representation, quarantine/non-delivery to individual staff inboxes, and later screenshot receipt.

- Supporting evidence: Compliance Theater case file `13`; November 4 Gmail print / imported source showing School Board auto-reply; N20-001 source evidence and graph draft overlay; related case file leads `313`, `320`, `321`, and `361`.

- Requested correction: Correct or supplement the record to state that the November 1 / November 4 parent email chain entered District-controlled email routing no later than November 4, 2024 and generated the School Board auto-reply. If the District maintains that the chain was later quarantined or not delivered to individual staff inboxes, the record should identify the specific recipient/channel and cite the audit, routing, quarantine, and mailbox-delivery records supporting that channel-specific timeline.

- Prior recipients to notify: Any District, Board, agency, counsel, investigator, administrator, or third-party recipient to whom the District disclosed the unqualified November 15 first-receipt framing.

## **Challenged Record 2: November 1 Verbal Notice / Incident-Report Statement**

- Record locator: November 20, 2024 email titled "Meeting Request," Compliance Theater case file `13`.
- Challenged statement/data: The email states that there was **no incident report** from the November 1 conversation and, based on internal interviews, **no verbal report was shared at that time**; it then uses that premise in the November 15 first-receipt account.
- Nature of disagreement: Later District-produced notes state that Mom came to school to get [REDACTED] trombone, shared that the family had learned about a sexual assault, declined to share additional details verbally, and stated that Dad would send an email. That is materially different from an unqualified statement implying no verbal notice of sexual-assault concern occurred.
- Supporting evidence: Compliance Theater case file `13`; District-produced File 4 / case file `364`; N20-002 source evidence and graph draft overlay.
- Requested correction: Correct or supplement the record to state that District-produced notes reflect that on November 1, Mom shared that the family had learned about a sexual assault, declined to provide additional details verbally, and indicated that Dad would send an email. If the District maintains that no "verbal report" was shared, the statement should be narrowed to mean no detailed verbal narrative or formal incident-report submission was provided, not that no verbal notice of a sexual-assault concern occurred.
- Prior recipients to notify: Any recipient of the unqualified "no verbal report" / November 15 first-receipt framing.

## **Challenged Record 3: Urgency / Safe-And-Supportive Environment Framing**

- Record locator: November 20, 2024 email titled "Meeting Request," Compliance Theater case file `13`.
- Challenged statement/data: The email apologizes for delay, assures the family that the District is treating the matter with the **"utmost urgency** and attention," and states that the school's goal is to ensure a **safe and supportive environment** and thoroughly address the concerns raised.
- Nature of disagreement: By November 4, the family had already told the District/Board that [REDACTED] had missed four days of school, that the family needed to know what steps would prevent recurrence if she returned, and that the delayed response was worsening harm. If the District maintains the November 20 statement as a record of actual urgent safety/supportive action already underway, the statement is incomplete without identifying what urgent action, safety planning, supportive measures, reentry planning, mandated-reporting review, or recurrence-prevention steps occurred after November 1, November 4, November 15, and by November 20.
- Supporting evidence: Compliance Theater case file `13`; case file `98`; case files `315`, `325`, `340`, `341`; N20-003 source evidence and graph draft overlay.
- Requested correction: Correct or supplement the record to clarify whether the **"utmost urgency," "safe and supportive environment,"** and "thoroughly address" language described concrete actions already taken by November 20, or only a forward-looking intention to schedule an intake interview. If concrete action had already commenced, identify the records showing what action was taken, by whom, when, and how it addressed the November 1 and November 4 safe-return requests. If no such records exist, qualify the November 20 assurance as aspirational/intake-focused rather than a record of completed urgent safety action.
- Prior recipients to notify: Any recipient of the November 20 urgency/safe-environment framing, and any recipient of later records relying on it as evidence of completed safety/supportive action.

## Challenged Record 4: Refused / Declined Participation Framing

- Record locators:

- January 8, 2025 response and forwarded copy, Compliance Theater case files `340` and `341`.

- January 24, 2025 HOMS investigation summary / response, case file `338`.

- March 13, 2025 Title IX summary, case file `335`.

- March 13, 2025 Emily Herman response, case file `336`.

- May 27, 2025 correction denial, case file `2450`.

- Later produced copies, including case file `2633` and May 26, 2026 Robert Cothorn production copies.

- Challenged statement/data: Later District records characterize parent/student participation as **refused, declined, denied, or otherwise unavailable**, and tie that framing to investigative delay, missing details, **inability to identify respondent(s)**, and inability to substantiate allegations.

- Nature of disagreement: The maintained records are materially incomplete and misleading if they blame lack of investigative progress, missing details, inability to identify accused/respondent(s), or inability to substantiate allegations on family nonparticipation without also stating that the family requested a CornerHouse/neutral **trauma-informed** interview path, requested maltreatment reports, raised concern about minimizing harm to a traumatized child, and that the District denied the outside-interviewer/CornerHouse path while offering District-controlled internal interviews and written-response alternatives.

- Supporting evidence: Case file `305` (**CornerHouse** and maltreatment-report request); case file `28` (District rejected outside interviewer and limited written responses to drop-off/mail because of email quarantine concerns); case file `29` (District repeated that it does not use CornerHouse/private entities for District investigations); case files `335`, `336`, `338`, `340`, `341`, `2450`, `2633`; graph fork `N20-004-LATER-REFUSAL-DECLINED-FRAMING`.

- Requested correction: Correct or supplement each refused/declined/nonparticipation statement to disclose the CornerHouse/neutral/trauma-informed interview request, District refusal to use an outside interviewer, the District's written-response constraints, and the family's stated concern about minimizing harm to [REDACTED]. The corrected records should not characterize the family as refusing, denying, obstructing, or declining the interview/intake process without that caveat.

- Prior recipients to notify: Any recipient of the January 8, January 24, March 13, May 27, June 10, or May 26, 2026 production copies or summaries containing the refused/declined framing.

## Attached Exhibit Packet

This request is supported by the attached Bates-stamped exhibit packet, `N20-RR-001 Exhibit Packet`, Bates range `N20EX-0001` through `N20EX-0035`. The packet includes a clickable index and highlighted source excerpts so the disputed data and omitted context are visible without relying on inference.

- `N20-EX-001` (`N20EX-0008`): November 20 meeting request and delivery-position record.

- `N20-EX-002` (`N20EX-0012`): November 4 School Board auto-reply representing Board receipt and possible administrative routing.

- `N20-EX-003` (`N20EX-0013`): November 1 and November 4 parent safety communications.

- `N20-EX-004` (`N20EX-0016`): District-produced File 4 notes showing November 1 verbal context.
- `N20-EX-005` (`N20EX-0017`): November 26 CornerHouse / maltreatment-report request from parents.
- `N20-EX-006` (`N20EX-0021`): December 2 District outside-interviewer denial and written-response constraint.
- `N20-EX-007` (`N20EX-0025`): December 5 District private-entity / CornerHouse denial.
- `N20-EX-008` (`N20EX-0027`): January 8 refusal / inability-to-gather framing.
- `N20-EX-009` (`N20EX-0030`): January 24 HOMS investigation summary decline framing.
- `N20-EX-010` (`N20EX-0031`): March 13 Title IX summary refusal / identity framing.
- `N20-EX-011` (`N20EX-0032`): March 13 Emily Herman response all-attempts-declined framing.
- `N20-EX-012` (`N20EX-0033`): May 27 correction-denial persistence.
- `N20-EX-013` (`N20EX-0034`): May 26 / June 10 production-copy persistence.

## Records And Source Basis Requested With This Correction

To resolve the accuracy and completeness issues above, please produce, identify as withheld with a specific basis, or state that no responsive data are maintained for the following source records:

1. The email systems audit referenced in the November 20 email, including Google Admin/Vault/email-log exports, quarantine/security-action records, School Board group auto-reply/routing records, original message/quarantine objects, and mailbox-delivery records for the November 1, November 4, and November 15 messages.
2. November 1 visitor/sign-in, office, calendar, call-log, trombone-pickup, staff-note, internal-interview, incident-report intake/refusal, or no-record documentation supporting the District's account of the November 1 interaction.
3. November 1 through November 20 safety/reentry planning, supportive-measure, mandated-reporting review, recurrence-prevention, assignment/escalation, and action-log records.
4. Records supporting the later words "refused," "declined," "denied," "all attempts were declined," "denial of interview," inability to identify respondent(s), and inability to substantiate allegations.
5. Records about the decision to refuse CornerHouse/outside/neutral interviewer use, records showing whether written questions were drafted/sent/discussed, and records distinguishing electronic written responses from hard-copy drop-off/mail constraints.
6. Any records showing whether the District considered accepting law-enforcement, CornerHouse, or other outside interview recordings/transcripts.

If any of these source-record categories are absent from the District's maintained or represented production universe, please state that expressly and correct any maintained statement that depends on the absent source basis.

## Deadline And Response Requirements

Under Minn. Stat. section 13.04, subdivision 4, the responsible authority must correct inaccurate or incomplete data or notify me that the District has determined the data are correct within 30 days of receipt. If received on June 9, 2026, the correction determination deadline is July 9, 2026.

If the District denies any correction, please provide the written reasons for that determination, the required appeal-right notice, and the FERPA hearing-right notice for education records. If the District completes or corrects the data, please identify the corrected record, the correction made, and the past recipients the District attempted to notify.

Sincerely,

[Redacted]

[Redacted]

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 1 of 7

| Exhibit    | Bates link                 | Bookmark label  | Source   | Why relevant  |
|------------|----------------------------|---|--|---|
| N20-EX-001 | <a href="#">N20EX-0008</a> | N20-EX-001 - Nov. 20 meeting request and delivery-position record | plsas_pst/attachments/district/emily_Herman_2025-01-27 [REDACTED] Data Request File 1 (1). | Shows the District's own Nov. 20 framing: audit, filtered Nov. 1/Nov. 4 chain, <b>no incident report</b> , no verbal report, first communication Nov. 15, and urgent safety/interview need. |
| N20-EX-002 | <a href="#">N20EX-0012</a> | N20-EX-002 - Nov. 4 School Board auto-reply                       | [REDACTED] t/attachments [REDACTED] 2024-11-ol_board_nov_4.txt                             | Shows the PLSAS School Board system represented that all School Board Directors received the Nov. 4 email and that follow-up would be routed if needed.                                     |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 2 of 7



| Exhibit    | Bates link                 | Bookmark label   | Source   | Why relevant   |
|------------|----------------------------|--|--|--|
| N20-EX-003 | <a href="#">N20EX-0013</a> | N20-EX-003 - Nov. 1 and Nov. 4 parent safety communications      | plsas_pst/attachments/compliance_theater/case_file_98_Concern Regarding Incidents Involving our Daughter.txt | Shows the subject matter and safety posture of the original chain that the Nov. 20 record later said was not received by staff.    |
| N20-EX-004 | <a href="#">N20EX-0016</a> | N20-EX-004 - Produced File 4 notes showing Nov. 1 verbal context | plsas_pst/attachments/district/emily_Herman_2025-02-13 [REDACTED] Data Request File 4.txt                    | Shows District-produced notes from Nov. 1 containing verbal-context facts that conflict with a blanket 'no verbal report' framing. |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 3 of 7


| Exhibit    | Bates link                 | Bookmark label   | Source  | Why relevant  |
|------------|----------------------------|--|---|---|
| N20-EX-005 | <a href="#">N20EX-0017</a> | N20-EX-005 - Nov. 26 <b>CornerHouse</b> request from parents                   | plsas_pst/attachments/district/em_mily_Herman_2025-01-27  Data Request File 1 (1). | Shows parents asked for a qualified forensic/CornerHouse-centered path rather than refusing investigation.  |
| N20-EX-006 | <a href="#">N20EX-0021</a> | N20-EX-006 - Dec. 2 outside-interviewer denial and written-response constraint | plsas_pst/attachments/district/em_mily_Herman_2025-01-27  Data Request File 1 (1). | Shows the District rejected an outside interviewer and limited written participation to physical drop-off/mail while the student was quarantined. |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 4 of 7

| Exhibit    | Bates link                 | Bookmark label   | Source  | Why relevant   |
|------------|----------------------------|--|---|--|
| N20-EX-007 | <a href="#">N20EX-0025</a> | N20-EX-007 - Dec. 5 private-entity / <b>CornerHouse</b> denial | plsas_pst/attachments/district/emily_Herman_2025-01-27  Data Request File 1 (1). | Shows the District's refusal to use or obtain outside investigative records, which undercuts later blame placed on parent/student participation. |
| N20-EX-008 | <a href="#">N20EX-0029</a> | N20-EX-008 - Jan. 8 refusal/inability-to-gather framing        | plsas_pst/attachments/district/michael/Michael_Thomas_2025-01-08_January 8 2025 Dr Thomas Response.txt  | Shows the later record expressly blaming investigative limits on refusal and the District's asserted inability to gather information.            |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 5 of 7

| Exhibit    | Bates link                 | Bookmark label  | Source  | Why relevant  |
|------------|----------------------------|---|---|---|
| N20-EX-009 | <a href="#">N20EX-0030</a> | N20-EX-009 - Jan. 24 HOMS investigation summary decline framing | plsas_pst/attachments/district/michael/Michael_Thomas_2025-01-24_January 24, 2025 Dr. Thomas Response.txt                       | Shows the District converting the Dec. 2024 participation dispute into a record that the father declined through an email exchange. |
| N20-EX-010 | <a href="#">N20EX-0031</a> | N20-EX-010 - Mar. 13 Title IX summary refusal/identity framing  | plsas_pst/attachments/district/emily/Emily_Herman_2025-03-13_2024 Title IX Sexual Harassment Complaint - Summary Report_2_2.txt | Shows the District tying inab identify the respondent and dismissal to [REDACTED] asserted decline/denial of interview.             |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 6 of 7

| Exhibit    | Bates link                 | Bookmark label  | Source  | Why relevant   |
|------------|----------------------------|---|---|--|
| N20-EX-011 | <a href="#">N20EX-0032</a> | N20-EX-011 - Mar. 13 E. Herman response all-attempts-declined framing | plsas_pst/attachments/district/emily/Emily_Herman_2025-03-13_March 13 2025 E. Herman Response_2_2.txt | Shows the District asserting all participation attempts were declined and that the investigation could not substantiate due to <b>lack of concrete evidence.</b> |
| N20-EX-012 | <a href="#">N20EX-0033</a> | N20-EX-012 - May 27 correction-denial persistence                     | plsas_pst/attachments/district/emily/Emily_Herman_2025-05-27_May 27 2025 Response_2_2.txt             | Shows the District denied correction while repeating the 'father declined' phrasing and calling the record complete and not misleading.                          |

Visible Bates page numbers are clickable links to the first page of each exhibit.

# N20-RR-001 Exhibit Packet

Source excerpts and highlighted District/parent records supporting the Nov. 20 meeting-request correction.

Index page 7 of 7

| Exhibit    | Bates link                 | Bookmark label   | Source   | Why relevant  |
|------------|----------------------------|--|--|---|
| N20-EX-013 | <a href="#">N20EX-0034</a> | N20-EX-013 - May 26 / June 10<br>production-copy persistence | plsas_pst/attachments/district/<br>robert_coth Robert_Cothern_2<br>026-05-26 [REDACTED] Data Request File<br>8.txt | Shows the same participation-blame language persisted into<br>later District production copies, so the correction is not<br>theoretical or stale. |

Visible Bates page numbers are clickable links to the first page of each exhibit.

N20EX-0007

# N20-EX-001 - Nov. 20 meeting request and delivery-position record

Generated source excerpt page 1

Date / production context: 2024-11-20

Source: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt

Source PDF: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).pdf

Graph / case-file reference: Compliance graph case\_file\_id 13 copy in District production File 1

Why relevant: Shows the District's own Nov. 20 framing: audit, filtered Nov. 1/Nov. 4 chain, no incident report, no verbal report, first communication Nov. 15, and urgent safety/interview need.

Highlighted terms: Following an email systems audit; original email from November 1, 2024 and November 4, 2024; was not delivered to any staff member's @plsas.org email account; no incident report; shared any information verbally; initial communication regarding this matter was received on Friday, November 15, 2024; utmost urgency; safe and supportive environment

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1154-1160

01154: Thank you for your response and for letting us know about the timeline of the ongoing investigation with the Prior Lake Police Department. We understand the importance of allowing [REDACTED] to focus on that process

01155: and appreciate you keeping us informed.

01156:

01157: Following an email systems audit with our Technology department, we want to inform you that your original email from November 1, 2024 and November 4, 2024 follow-up email (.original email chain.) regarding

01158: these allegations was filtered by our email security protocols. We have confirmed that the email system generates automated replies (i.e. the School Board email auto-reply) as an email enters the system. Then, the

01159: system reviews the content of the email and quarantines any messages based on established security protocols. Therefore, we can confirm that the School Board auto-reply email was sent to you but your original

01160: email chain was not delivered to any of the @plsas.org inboxes. We apologize this caused a delay in receiving your original email chain and we want to assure you that we are treating this matter with the utmost

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1160-1166

01160: email chain was not delivered to any of the @plsas.org inboxes. We apologize this caused a delay in receiving your original email chain and we want to assure you that we are treating this matter with the utmost

01161: urgency and attention.

01162:

01163: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement investigation. Our goal is to ensure a safe and supportive environment for all students and

01164: to thoroughly address the concerns raised. Conducting an initial interview is a critical step in our process, as it allows us to gather necessary information to proceed with any potential actions within the school's

01165: purview.

01166:

## N20-EX-001 - Nov. 20 meeting request and delivery-position record

Generated source excerpt page 2

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1170-1176

01170: Regarding your request for incident reports:

01171:

01172: 1. Please find the attached incident report from the health class incident.

01173: 2. There is currently no incident report from the conversation on November 1st. Based on internal interviews, when asked if [REDACTED] would like to share a report with Scott, it was stated that the preference was to communicate in

01174:

01175: Thank you as we try to work together to address these concerns. Please feel free to reach out if you have additional questions or if there are any accommodations we can make to facilitate the intake interview.

01176:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1248-1254

01248: Thank you for your response and for letting us know about the timeline of the ongoing investigation with the Prior Lake Police

01249: Department. We understand the importance of allowing [REDACTED] to focus on that process and appreciate you keeping us informed.

01250:

01251: Following an email systems audit with our Technology department, we want to inform you that your original email from November

01252: 1, 2024 and November 4, 2024 follow-up email (.original email chain.) regarding these allegations was filtered by our email

01253: security protocols. We have confirmed that the email system generates automated replies (i.e. the School Board email auto-reply)

01254: as an email enters the system. Then, the system reviews the content of the email and quarantines any messages based on

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1254-1260

01254: as an email enters the system. Then, the system reviews the content of the email and quarantines any messages based on

01255: established security protocols. Therefore, we can confirm that the School Board auto-reply email was sent to you but your original

01256: email chain was not delivered to any of the @plsas.org inboxes. We apologize this caused a delay in receiving your original email

01257: chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01258:

01259: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01260: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1257-1263

01257: chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01258:

01259: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01260: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

01261: raised. Conducting an initial interview is a critical step in our process, as it allows us to gather necessary information to proceed

01262: with any potential actions within the school's purview.

01263:

## N20-EX-001 - Nov. 20 meeting request and delivery-position record

Generated source excerpt page 3

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1269-1275

01269: Regarding your request for incident reports:

01270:

01271: 1. Please find the attached incident report from the health class incident.

01272: 2. There is currently no incident report from the conversation on November 1st. Based on internal interviews, when asked if

01273: [REDACTED] would like to share a report with Scott, it was stated that the preference was to communicate in writing and no verbal

01274: report was shared at that time. Therefore, the initial communication received on the sexual abuse allegations was not

01275: received until Friday, November 15th when you forwarded the screenshots of the original email chain that was quarantined

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1345-1351

01345: Thank you for your response and for letting us know about the timeline of the ongoing investigation with the Prior Lake Police

01346: Department. We understand the importance of allowing [REDACTED] to focus on that process and appreciate you keeping us informed.

01347:

01348: Following an email systems audit with our Technology department, we want to inform you that your original email from

01349: November 1, 2024 and November 4, 2024 follow-up email (.original email chain.) regarding these allegations was filtered by our

01350: email security protocols. We have confirmed that the email system generates automated replies (i.e. the School Board email

01351: auto-reply) as an email enters the system. Then, the system reviews the content of the email and quarantines any messages

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1352-1358

01352: based on established security protocols. Therefore, we can confirm that the School Board auto-reply email was sent to you but

01353:

01354: your original email chain was not delivered to any of the @plsas.org inboxes. We apologize this caused a delay in receiving

01355: your original email chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01356:

01357: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01358: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1355-1361

01355: your original email chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01356:

01357: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01358: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

01359: raised. Conducting an initial interview is a critical step in our process, as it allows us to gather necessary information to proceed

01360: with any potential actions within the school's purview.

01361:

# N20-EX-001 - Nov. 20 meeting request and delivery-position record

Generated source excerpt page 4

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1367-1373

01367: Regarding your request for incident reports:

01368:

01369: 1. Please find the attached incident report from the health class incident.

01370: 2. There is currently no incident report from the conversation on November 1st. Based on internal interviews, when asked if

01371: [REDACTED] would like to share a report with Scott, it was stated that the preference was to communicate in writing and no

01372: verbal report was shared at that time. Therefore, the initial communication received on the sexual abuse allegations was

01373: not received until Friday, November 15th when you forwarded the screenshots of the original email chain that was

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1481-1487

01481: Thank you for your response and for letting us know about the timeline of the ongoing investigation with the Prior Lake Police

01482: Department. We understand the importance of allowing [REDACTED] to focus on that process and appreciate you keeping us informed.

01483:

01484: Following an email systems audit with our Technology department, we want to inform you that your original email from

01485: November 1, 2024 and November 4, 2024 follow-up email (.original email chain.) regarding these allegations was filtered by our

01486: email security protocols. We have confirmed that the email system generates automated replies (i.e. the School Board email

01487: auto-reply) as an email enters the system. Then, the system reviews the content of the email and quarantines any messages

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1487-1493

01487: auto-reply) as an email enters the system. Then, the system reviews the content of the email and quarantines any messages

01488: based on established security protocols. Therefore, we can confirm that the School Board auto-reply email was sent to you but

01489: your original email chain was not delivered to any of the @plsas.org inboxes. We apologize this caused a delay in receiving

01490: your original email chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01491:

01492: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01493: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1490-1496

01490: your original email chain and we want to assure you that we are treating this matter with the utmost urgency and attention.

01491:

01492: It is important to note that the school's role in addressing these concerns is separate and distinct from the law enforcement

01493: investigation. Our goal is to ensure a safe and supportive environment for all students and to thoroughly address the concerns

01494:

01495: raised. Conducting an initial interview is a critical step in our process, as it allows us to gather necessary information to proceed

01496: with any potential actions within the school's purview.

# N20-EX-002 - Nov. 4 School Board auto-reply

Generated source excerpt page 1

Date / production context: 2024-11-04

Source: pldas\_pst/attachments [REDACTED] [REDACTED] 2024-11-04\_school\_board\_nov\_4.txt

Source PDF: pldas\_pst/attachments [REDACTED] [REDACTED] 2024-11-04\_school\_board\_nov\_4.pdf

Graph / case-file reference: Compliance graph case\_file\_id 313 / parent mailbox source

Why relevant: Shows the PLSAS School Board system represented that all School Board Directors received the Nov. 4 email and that follow-up would be routed if needed.

Highlighted terms: all School Board Directors have received your email; If you've made a request or require additional follow up; forward your email to the appropriate administrator

pldas\_pst/attachments [REDACTED] [REDACTED] 2024-11-04\_school\_board\_nov\_4.txt lines 148-154

00148: Thank you for contacting the PLSAS School Board. We want to let you know that all School Board Directors have

00149: received your email. We value and appreciate your input and are grateful for your engagement with our district.

00150:

00151: If you've made a request or require additional follow up I, as the School Board chair, or a designee will respond. If

00152: needed, I may also forward your email to the appropriate administrator to ensure your questions or concerns are properly

00153: addressed.

00154:

pldas\_pst/attachments [REDACTED] [REDACTED] 2024-11-04\_school\_board\_nov\_4.txt lines 149-155

00149: received your email. We value and appreciate your input and are grateful for your engagement with our district.

00150:

00151: If you've made a request or require additional follow up I, as the School Board chair, or a designee will respond. If

00152: needed, I may also forward your email to the appropriate administrator to ensure your questions or concerns are properly

00153: addressed.

00154:

00155: We appreciate your engagement and thank you for your support.

## N20-EX-003 - Nov. 1 and Nov. 4 parent safety communications

Generated source excerpt page 1

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Date / production context: 2024-11-01 / 2024-11-04

Source: pldas\_pst/attachments/compliance\_theater/case\_file\_98\_Concern Regarding Incidents Involving our Daughter.txt

Source PDF: not available in this packet

Graph / case-file reference: Compliance graph case\_file\_ids 98, 315, 325

Why relevant: Shows the subject matter and safety posture of the original chain that the Nov. 20 record later said was not received by staff.

Highlighted terms: [REDACTED] assault; harassment; missed four days; safety; before we can send her back

plsas\_pst/attachments/compliance\_theater/case\_file\_98\_Concern Regarding Incidents Involving our Daughter.txt lines 1-1

00001: Scott, We are writing to express our deep concern and dismay regarding your recent classification of the incident involving our daughter as 'horseplay gone too far.' As you are or should be aware, [REDACTED] was struck on the head with a chair five times over 2 separate occurrences by Reyna?, resulting in a concussion. Your characterization implies that our daughter was voluntarily engaged in rough play before the attack, which she strongly denies. It is troubling that this interpretation seems to downplay the severity of the situation and misrepresents our daughter's experience. Furthermore, we find it concerning that you made this determination before interviewing our daughter about the incident. It raises questions about how such a serious event could be assessed as such without directly hearing from the victim. It is hard enough to understand how such a violent incident could occur suddenly in a classroom during class time with a teacher present. The fact that there was an opportunity for the teacher to intervene or deescalate what is described as 'horseplay' before the assault occurred is even more concerning. When also taking into account the fact that no one else in the classroom recognized this action as something that warranted immediate attention from staff, it all points to significant issues regarding supervision and student safety. Since learning of this incident, every professional we have consulted with has advised us to contact the police. The description of the event we have heard most often is 'felony assault' or "felony aggravated assault". As a mandated reporter, we find it surprising that you did not identify it as such. Could you please inform us what agencies you have reported the event to, and when those reports were made? We would also appreciate it if you could share the evidence you have gathered that led you to believe that [REDACTED] was involved in any form of consensual rough play before the event occurred. It is good to hear that Reyna's parents are "taking this very seriously"; however, review of Prior Lake's published disciplinary policy <[https://www.plsas.org/uploaded/School\\_Board/Policies/500/506\\_-\\_Student\\_Discipline.pdf](https://www.plsas.org/uploaded/School_Board/Policies/500/506_-_Student_Discipline.pdf)> points towards multiple blows to the head with a chair that result in a concussion as falling under actions that "cause or could cause injury" or "assaultive behavior". These are addressed in that policy as follows: Removal from Class: The student may be immediately removed from class if they engage in violent or assaultive behavior, which endangers others' safety, Suspension, Expulsion, or Exclusion: Depending on the severity (especially since a concussion is a serious injury) an out-of-school suspension, expulsion, or exclusion may (in our opinion) be warranted. Referral to Law Enforcement: Given the gravity of the incident, a referral to law enforcement might also be pursued in addition to school disciplinary actions. Behavioral Readmission Plan: Should the student be readmitted, they might be required to follow a behavioral plan, which could include counseling, mental health services, or other supportive interventions aimed at preventing recurrence Which of these actions will be or have been taken? It seemed unlikely both to us and to the PHP assessor [REDACTED] met with today that something this severe would be the first act of bullying against her that this peer group has engaged in. While speaking with that assessor, [REDACTED] spoke to several concerning incidents from various peers that predate the assault. She has been hit and kicked repeatedly, including incidents where she has been intentionally hit on the head since the concussion occurred. She has numerous bruises on her legs that support her account of this being an ongoing and systemic issue. While we acknowledge that her recent behavior of self-harm could play a factor, neither ourselves nor the PHP assessor we met with saw these bruises fitting her pattern of cutting and do not believe they were self-inflicted. We have since found chat messages sent by [REDACTED] indicating she was terrified to tell anyone about the chair incident because she feared retaliation from the girl's friends, to the point of stating she was afraid they would "break every bone in my body". In addition to the ongoing physical abuse, [REDACTED] disclosed that one of her peers - named [REDACTED] - has been sexually assaulting her in school on an almost daily basis. That abuse began about 2 months ago. It includes unwanted touching of her breasts and genitals, at times while being held up against a wall and unable to break free. This has been accompanied with physical and verbal abuse, with a number of her peers calling her a 'gay bitch'. We find it unacceptable that these types of homophobic slurs seem to go unnoticed and unrebuked at Hidden Oaks. We are astounded that what otherwise would be a serious issue to address is at this point the least of our concerns. It is not at all lost on us that this abuse started just a few weeks at most before the drastic shift in [REDACTED] s behavior - including the introduction and rapid escalation of self harm - occurred. It is worth noting that her PHP assessor - also a mandated reporter - has already contacted CPS regarding [REDACTED] s actions, and our understanding is that the case has been referred to the police. It is our expectation that our daughter has a safe environment in which she can learn. At this point, our confidence that this has been occurring at Hidden Oaks, or that any of the remediations taken to date are likely to lead to it occurring in the future, is effectively zero. She has been referred to a partial hospitalization program, and will be starting Thursday, Nov 7th . It is [REDACTED]

N20-EX-003 - Nov. 1 and Nov. 4 parent safety communications

Generated source excerpt page 3

plsas\_pst/attachments/compliance\_theater/case\_file\_315\_Fwd\_ [REDACTED] O\_Brien.txt lines 1-1

00001: ----- Forwarded message ----- From: [REDACTED]  
Date: Tue, Nov 5, 2024, 6:48 AM Subject: [REDACTED] To: HOMS Attendance  
<homsattendance@plsas.org> [REDACTED] 6th Grader, will be absent today due to our concerns  
for her health, wellbeing, and safety while at school.

# N20-EX-004 - Produced File 4 notes showing Nov. 1 verbal context

Generated source excerpt page 1

Date / production context: 2024-11-01 / produced 2025-02-13

Source: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.txt

Source PDF: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.pdf

Graph / case-file reference: Compliance graph case\_file\_id 364 / District production File 4

Why relevant: Shows District-produced notes from Nov. 1 containing verbal-context facts that conflict with a blanket 'no verbal report' framing.

Highlighted terms: Mom shared; family had learned; sexual assault; declined to share; Dad emailed

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.txt lines 169-175

00169: .O lefta VM

00170: Oo

00171:

00172: a : reported the chair incident. Mom shared she was not sure if it

00173: occurred or if injury was self-inflicted

00174: Mom forwarded the ER visit summary

00175: Oo

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.txt lines 194-200

00194:

00195: o Mom emailed wanting to pick up [REDACTED] s trombone

00196: o Mom came in to get the trombone

00197: Pe Mom shared they learned about a sexual assault.

00198:

00199: o Mom reported she did not want to share anything verbally and her

00200: husband would be sending an email.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.txt lines 318-324

00318: 6:59 ae

00319: Pe

00320: 07:04 Emily Herman: (EE [REDACTED] lid) she make any reference to alleged sexual

00321: harassment, or sexual assault? [i

00322: 7 I

00323: 07:13 Emily Hema:

00324: No. iii!

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-02-13 [REDACTED] Data Request File 4.txt lines 540-546

00540: don't have a date for you from the father [REDACTED] | forget his first name. Where messages were

00541: attempt to be sent tol [REDACTED] en addressed on those

00542: email messages, but they were blocked by our district. Filters. and then,

00543: 09:42 Emily Herman: And that's regarding both this incident and also alleged sexual assault

00544: correct.

00545: 09:47 EE That is correct. So that would have been the. That would have been the

00546: communication with the fatherJ

## N20-EX-005 - Nov. 26 CornerHouse request from parents

Generated source excerpt page 1

Date / production context: 2024-11-26

Source: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt

Source PDF: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).pdf

Graph / case-file reference: Compliance graph case\_file\_id 305 copy in District production File 1

Why relevant: Shows parents asked for a qualified forensic/CornerHouse-centered path rather than refusing investigation.

Highlighted terms: CornerHouse; maltreatment reports; forensic interview; trauma-informed

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1292-1298

01292: I apologize for any delay in our response; this is our first time through this process and it can take time to research and  
01293: identify how we can move forward while minimizing the impact on what has already been a traumatizing few months for our  
01294: daughter in particular and family in general. We would like the interviews - for both the sexual assault as well as when [REDACTED]  
01295: was attacked with a weapon in health class on Oct 28th - be conducted by CornerHouse (<https://www.cornerhousemn.org>  
01296: ). Additionally, we would like to be provided with a copy of the maltreatment report(s) that have been filed for either of these  
01297: events.  
01298:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2019-2025

02019:  
02020:  
02021:  
02022: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another  
02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2021-2027

02021:  
02022: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another  
02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02026: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02027: requirements than school districts.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2023-2029

02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The

02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct

02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

02026: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy

02027: requirements than school districts.

02028:

02029:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2028-2034

02028:

02029:

02030:

02031: The District is denying your specific request to have CornerHouse interview [REDACTED] for the District investigation. However, that

02032: does not mean that the District's investigation will be biased and unreliable. The District's employees who are trained in Title

02033: IX investigations have received training in conducting unbiased and fair investigations. It is in the District's best interest to

02034: accurately determine what happened and whether any action is required in response.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2036-2042

02036:

02037:

02038: Please understand that the District cannot provide all the information you seek because it is required to comply with data

02039: privacy laws The District is unable to provide you information regarding any maltreatment reports. Pursuant to Minnesota

02040: Statutes Section 260E.35, subd. 3, reports of maltreatment are classified as confidential. Under the Minnesota

02041: Government Data Practices Act, that means the reports are not public and inaccessible to anyone, including a person who is

02042: the subject of the report. Minn. Stat. 13.02, subd. 3. If you are looking for information about whether and/or who made such

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2299-2305

02299:

02300:

02301:

02302: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another

02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The

02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct

02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2301-2307

02301:  
02302: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another  
02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02306: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02307: requirements than school districts.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2303-2309

02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02306: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02307: requirements than school districts.  
02308:  
02309:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2308-2314

02308:  
02309:  
02310:  
02311: The District is denying your specific request to have CornerHouse interview [REDACTED] for the District investigation. However,  
02312: that does not mean that the District's investigation will be biased and unreliable. The District's employees who are trained  
02313: in Title IX investigations have received training in conducting unbiased and fair investigations. It is in the District's best  
02314: interest to accurately determine what happened and whether any action is required in response.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2316-2322

02316:  
02317:  
02318: Please understand that the District cannot provide all the information you seek because it is required to comply with data  
02319: privacy laws The District is unable to provide you information regarding any maltreatment reports. Pursuant to Minnesota  
02320: Statutes Section 260E.35, subd. 3, reports of maltreatment are classified as .confidential. Under the Minnesota  
02321: Government Data Practices Act, that means the reports are not public and inaccessible to anyone, including a person who  
02322: is the subject of the report. Minn. Stat. 13.02, subd. 3. If you are looking for information about whether and/or who made

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2615-2621

02615:

02616:

02617:

02618: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or

02619: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the

02620: investigation. The District cannot access such records on its own. The District does not use private entities such as

02621: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2618-2624

02618: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or

02619: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the

02620: investigation. The District cannot access such records on its own. The District does not use private entities such as

02621: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data

02622: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law

02623: enforcement have different data privacy requirements than school districts.

02624:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2619-2625

02619: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the

02620: investigation. The District cannot access such records on its own. The District does not use private entities such as

02621: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data

02622: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law

02623: enforcement have different data privacy requirements than school districts.

02624:

02625:

# N20-EX-006 - Dec. 2 outside-interviewer denial and written-response constraint

Generated source excerpt page 1

Date / production context: 2024-12-02

Source: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt

Source PDF: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).pdf

Graph / case-file reference: Compliance graph case\_file\_id 28 copy in District production File 1

Why relevant: Shows the District rejected an outside interviewer and limited written participation to physical drop-off/mail while the student was quarantined.

Highlighted terms: cannot use an outside interviewer; written responses; drop them off; mail them; do not email confidential information

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1528-1534

01528: chain when we respond.

01529:

01530: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is separate from

01531: other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the opportunity

01532: to meet with you and your daughter either in-person or virtually. However, we would like to offer an alternative option. If you

01533: still do not wish to interview with us, we could send a set of written questions for our initial interview that you could complete

01534: with your daughter. It would be best that the written responses are either dropped off at or mailed to Hidden Oaks or District

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1531-1537

01531: other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the opportunity

01532: to meet with you and your daughter either in-person or virtually. However, we would like to offer an alternative option. If you

01533: still do not wish to interview with us, we could send a set of written questions for our initial interview that you could complete

01534: with your daughter. It would be best that the written responses are either dropped off at or mailed to Hidden Oaks or District

01535: Services Center to either Joe or myself. This would ensure the email quarantine process would not impede the delivery of

01536: the responses.

01537:

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1692-1698

01692: email chain when we respond.

01693:

01694: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is separate

01695: from other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the

01696: opportunity to meet with you and your daughter either in-person or virtually. However, we would like to offer an alternative

01697: option. If you still do not wish to interview with us, we could send a set of written questions for our initial interview that you

01698: could complete with your daughter. It would be best that the written responses are either dropped off at or mailed to

## N20-EX-006 - Dec. 2 outside-interviewer denial and written-response constraint

Generated source excerpt page 2

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1695-1701

01695: from other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the  
01696: opportunity to meet with you and your daughter either in-person or virtually. However, we would like to offer an alternative  
01697: option. If you still do not wish to interview with us, we could send a set of written questions for our initial interview that you  
01698: could complete with your daughter. It would be best that the written responses are either dropped off at or mailed to  
01699: Hidden Oaks or District Services Center to either Joe or myself. This would ensure the email quarantine process would  
01700: not impede the delivery of the responses.  
01701:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1872-1878

01872: the email chain when we respond.  
01873:  
01874: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is separate  
01875: from other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the  
01876: opportunity to meet with you and your daughter either in-person or virtually. However, we would like to offer an  
01877: alternative option. If you still do not wish to interview with us, we could send a set of written questions for our initial  
01878: interview that you could complete with your daughter. It would be best that the written responses are either dropped off

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 1875-1881

01875: from other entities and therefore we cannot use an outside interviewer for our process. We would still appreciate the  
01876: opportunity to meet with you and your daughter either in-person or virtually. However, we would like to offer an  
01877: alternative option. If you still do not wish to interview with us, we could send a set of written questions for our initial  
01878: interview that you could complete with your daughter. It would be best that the written responses are either dropped off  
01879: at or mailed to Hidden Oaks or District Services Center to either Joe or myself. This would ensure the email quarantine  
01880:  
01881: process would not impede the delivery of the responses.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2010-2016

02010:  
02011:  
02012: The District wants to gather that information in a manner that will not harm [REDACTED] As previously shared, we would be willing  
02013: to have her submit written responses to questions. Or, if specific questions may be too much, we'd ask that [REDACTED] share the  
02014: allegations she remembers in as much detail as possible, including the dates or approximate time frame of events, who was  
02015: involved, who may have witnessed them, and what occurred. Either process would allow you and her service providers to  
02016: determine the best time and manner in which to respond and to let [REDACTED] decide whether she would like to orally respond with

## N20-EX-006 - Dec. 2 outside-interviewer denial and written-response constraint

Generated source excerpt page 3

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2136-2142

02136: on the email chain when we respond.

02137:

02138: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is

02139: separate from other entities and therefore we cannot use an outside interviewer for our process. We would still

02140: appreciate the opportunity to meet with you and your daughter either in-person or virtually. However, we would like to

02141: offer an alternative option. If you still do not wish to interview with us, we could send a set of written questions for our

02142: initial interview that you could complete with your daughter. It would be best that the written responses are either

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2139-2145

02139: separate from other entities and therefore we cannot use an outside interviewer for our process. We would still

02140: appreciate the opportunity to meet with you and your daughter either in-person or virtually. However, we would like to

02141: offer an alternative option. If you still do not wish to interview with us, we could send a set of written questions for our

02142: initial interview that you could complete with your daughter. It would be best that the written responses are either

02143: dropped off at or mailed to Hidden Oaks or District Services Center to either Joe or myself. This would ensure the

02144: email quarantine process would not impede the delivery of the responses.

02145:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2290-2296

02290:

02291:

02292: The District wants to gather that information in a manner that will not harm [REDACTED] As previously shared, we would be

02293: willing to have her submit written responses to questions. Or, if specific questions may be too much, we'd ask that [REDACTED]

02294: share the allegations she remembers in as much detail as possible, including the dates or approximate time frame of

02295: events, who was involved, who may have witnessed them, and what occurred. Either process would allow you and her

02296: service providers to determine the best time and manner in which to respond and to let [REDACTED] decide whether she would

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2418-2424

02418: other entities on the email chain when we respond.

02419:

02420: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is

02421: separate from other entities and therefore we cannot use an outside interviewer for our process. We would still

02422: appreciate the opportunity to meet with you and your daughter either in-person or virtually. However, we would like

02423: to offer an alternative option. If you still do not wish to interview with us, we could send a set of written questions

02424: for our initial interview that you could complete with your daughter. It would be best that the written responses are

## N20-EX-006 - Dec. 2 outside-interviewer denial and written-response constraint

Generated source excerpt page 4

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2421-2427

02421: separate from other entities and therefore we cannot use an outside interviewer for our process. We would still  
02422: appreciate the opportunity to meet with you and your daughter either in-person or virtually. However, we would like  
02423: to offer an alternative option. If you still do not wish to interview with us, we could send a set of written questions  
02424: for our initial interview that you could complete with your daughter. It would be best that the written responses are  
02425: either dropped off at or mailed to Hidden Oaks or District Services Center to either Joe or myself. This would  
02426: ensure the email quarantine process would not impede the delivery of the responses.  
02427:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2606-2612

02606:  
02607:  
02608: The District wants to gather that information in a manner that will not harm [REDACTED] As previously shared, we would be  
02609: willing to have her submit written responses to questions. Or, if specific questions may be too much, we'd ask that [REDACTED]  
02610: share the allegations she remembers in as much detail as possible, including the dates or approximate time frame of  
02611: events, who was involved, who may have witnessed them, and what occurred. Either process would allow you and her  
02612: service providers to determine the best time and manner in which to respond and to let [REDACTED] decide whether she would

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2734-2740

02734: including other entities on the email chain when we respond.  
02735:  
02736: We appreciate your concern with interviewing for your daughter. As mentioned previously, our investigation is  
02737: separate from other entities and therefore we cannot use an outside interviewer for our process. We would still  
02738: appreciate the opportunity to meet with you and your daughter either in-person or virtually. However, we would  
02739: like to offer an alternative option. If you still do not wish to interview with us, we could send a set of written  
02740: questions for our initial interview that you could complete with your daughter. It would be best that the written

Date / production context: 2024-12-05

Source: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt

Source PDF: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).pdf

Graph / case-file reference: Compliance graph case\_file\_id 29 copy in District production File 1

Why relevant: Shows the District's refusal to use or obtain outside investigative records, which undercuts later blame placed on parent/student participation.

Highlighted terms: District is looking to conduct its own investigation; does not use private entities; District cannot access such records on its own; data privacy

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2021-2027

02021:

02022: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another

02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The

02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct

02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

02026: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy

02027: requirements than school districts.

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2022-2028

02022: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another

02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The

02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct

02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

02026: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy

02027: requirements than school districts.

02028:

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2023-2029

02023: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The

02024: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct

02025: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and

02026: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy

02027: requirements than school districts.

02028:

02029:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2301-2307

02301:  
02302: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another  
02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02306: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02307: requirements than school districts.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2302-2308

02302: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or another  
02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02306: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02307: requirements than school districts.  
02308:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2303-2309

02303: entity about the allegations, you could provide a copy of that recording or transcript to us for use in the investigation. The  
02304: District cannot access such records on its own. The District does not use private entities such as CornerHouse to conduct  
02305: District investigations, in part, because of the District's responsibilities with respect to data privacy of other students and  
02306: staff. Law enforcement frequently use CornerHouse or similar entities but law enforcement have different data privacy  
02307: requirements than school districts.  
02308:  
02309:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2617-2623

02617:  
02618: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or  
02619: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the  
02620: investigation. The District cannot access such records on its own. The District does not use private entities such as  
02621: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data  
02622: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law  
02623: enforcement have different data privacy requirements than school districts.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2620-2626

02620: investigation. The District cannot access such records on its own. The District does not use private entities such as  
02621: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data  
02622: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law  
02623: enforcement have different data privacy requirements than school districts.  
02624:  
02625:  
02626:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2630-2636

02630: District's best interest to accurately determine what happened and whether any action is required in response.  
02631:  
02632: Please understand that the District cannot provide all the information you seek because it is required to comply with  
02633: data privacy laws The District is unable to provide you information regarding any maltreatment reports. Pursuant to  
02634: Minnesota Statutes Section 260E.35, subd. 3, reports of maltreatment are classified as confidential. Under the  
02635: Minnesota Government Data Practices Act, that means the reports are not public and inaccessible to anyone, including  
02636: a person who is the subject of the report. Minn. Stat. 13.02, subd. 3. If you are looking for information about whether

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2924-2930

02924:  
02925: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or  
02926: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the  
02927: investigation. The District cannot access such records on its own. The District does not use private entities such as  
02928:  
02929: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data  
02930: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2928-2934

02928:  
02929: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to data  
02930: privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law  
02931: enforcement have different data privacy requirements than school districts.  
02932:  
02933:  
02934:

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 2940-2946

02940:  
02941:  
02942: Please understand that the District cannot provide all the information you seek because it is required to comply with  
02943: data privacy laws The District is unable to provide you information regarding any maltreatment reports. Pursuant to  
02944: Minnesota Statutes Section 260E.35, subd. 3, reports of maltreatment are classified as .confidential.. Under the  
02945: Minnesota Government Data Practices Act, that means the reports are not public and inaccessible to anyone,  
02946: including a person who is the subject of the report. Minn. Stat. 13.02, subd. 3. If you are looking for information about

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 3277-3283

03277:  
03278: In the alternative, if [REDACTED] has already participated in a recorded interview with CornerHouse, law enforcement, or  
03279: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the  
03280: investigation. The District cannot access such records on its own. The District does not use private entities such as  
03281: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to  
03282: data privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law  
03283: enforcement have different data privacy requirements than school districts.

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-01-27 [REDACTED] Data Request File 1 (1).txt lines 3279-3285

03279: another entity about the allegations, you could provide a copy of that recording or transcript to us for use in the  
03280: investigation. The District cannot access such records on its own. The District does not use private entities such as  
03281: CornerHouse to conduct District investigations, in part, because of the District's responsibilities with respect to  
03282: data privacy of other students and staff. Law enforcement frequently use CornerHouse or similar entities but law  
03283: enforcement have different data privacy requirements than school districts.  
03284:  
03285:

# N20-EX-008 - Jan. 8 refusal/inability-to-gather framing

Generated source excerpt page 1

Date / production context: 2025-01-08

Source: pldas\_pst/attachments/district/michael/Michael\_Thomas\_2025-01-08\_January 8 2025 Dr Thomas Response.txt

Source PDF: pldas\_pst/attachments/district/michael/Michael\_Thomas\_2025-01-08\_January 8 2025 Dr Thomas Response.pdf

Graph / case-file reference: Compliance graph case\_file\_id 341 / District attachment

Why relevant: Shows the later record expressly blaming investigative limits on refusal and the District's asserted inability to gather information.

Highlighted terms: You refused; inability to gather; remains ongoing; does not know the names

pldas\_pst/attachments/district/michael/Michael\_Thomas\_2025-01-08\_January 8 2025 Dr Thomas Response.txt lines 28-34

00028: DistrictonNovember15, SuperintendentDr. MichaelThomasrequestedthatExecutiveDirector  
00029: of Administrative Services EmilyHermanconductaninvestigation.Ms.Hermancontactedyou  
00030: several times requesting that [REDACTED] provide information related to the complaint, including  
00031: providing written responses to questions rather than through a live interview. You refused  
to  
00032: provide such information.  
00033: Due to the District's inability to gather information from [REDACTED] regarding the allegations,  
the  
00034: investigation into your concerns remains ongoing. By way of example, the District does not

pldas\_pst/attachments/district/michael/Michael\_Thomas\_2025-01-08\_January 8 2025 Dr Thomas Response.txt lines 30-36

00030: several times requesting that [REDACTED] provide information related to the complaint, including  
00031: providing written responses to questions rather than through a live interview. You refused  
to  
00032: provide such information.  
00033: Due to the District's inability to gather information from [REDACTED] regarding the allegations,  
the  
00034: investigation into your concerns remains ongoing. By way of example, the District does not  
00035: knowwhichpeersallegedly.hitandkicked [REDACTED] repeatedly.orintentionallyhitheronthehead  
00036:

pldas\_pst/attachments/district/michael/Michael\_Thomas\_2025-01-08\_January 8 2025 Dr Thomas Response.txt lines 31-37

00031: providing written responses to questions rather than through a live interview. You refused  
to  
00032: provide such information.  
00033: Due to the District's inability to gather information from [REDACTED] regarding the allegations,  
the  
00034: investigation into your concerns remains ongoing. By way of example, the District does not  
00035: knowwhichpeersallegedly.hitandkicked [REDACTED] repeatedly.orintentionallyhitheronthehead  
00036:  
00037: Prior Lake-Savage Area Schools phone952.226.0000

## N20-EX-009 - Jan. 24 HOMS investigation summary decline framing

Generated source excerpt page 1

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Date / production context: 2025-01-24

Source: p\slas\_pst\attachments\district\michael\Michael\_Thomas\_2025-01-24\_January 24, 2025 Dr. Thomas Response.txt

Source PDF: p\slas\_pst\attachments\district\michael\Michael\_Thomas\_2025-01-24\_January 24, 2025 Dr. Thomas Response.pdf

Graph / case-file reference: Compliance graph case\_file\_id 338 / District attachment

Why relevant: Shows the District converting the Dec. 2024 participation dispute into a record that the father declined through an email exchange.

Highlighted terms: father declined through an email exchange; alleged victim's father declined

No automated snippet match was found. Review source path above.

# N20-EX-010 - Mar. 13 Title IX summary refusal/identity framing

Generated source excerpt page 1

Date / production context: 2025-03-13

Source: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_2024 Title IX Sexual Harassment

Complaint - Summary Report\_2\_2.txt

Source PDF: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_2024 Title IX Sexual

Harassment Complaint - Summary Report\_2\_2.pdf

Graph / case-file reference: Compliance graph case\_file\_id 335 / District attachment

Why relevant: Shows the District tying inability to identify the respondent and dismissal to [REDACTED] asserted decline/denial of interview.

Highlighted terms: [REDACTED] declined; denial of interview; unable to identify the respondent; dismissed

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_2024 Title IX Sexual Harassment Complaint - Summary Report\_2\_2.txt lines 31-37

00031:

00032: The District made multiple efforts and offered various methods for [REDACTED] to provide information

00033: regarding the complaint, including the option to submit written responses to questions instead of

00034: participating in a live interview. However, [REDACTED] declined for [REDACTED] to provide this information. As a

00035: result of the District's inability to obtain details from [REDACTED] about the allegations, the investigation

00036: lacked crucial information such as witness names, involved students, respondent/s information,

00037: timelines, locations, and factual evidence necessary for a thorough examination. It was

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_2024 Title IX Sexual Harassment Complaint - Summary Report\_2\_2.txt lines 35-41

00035: result of the District's inability to obtain details from [REDACTED] about the allegations, the investigation

00036: lacked crucial information such as witness names, involved students, respondent/s information,

00037: timelines, locations, and factual evidence necessary for a thorough examination. It was

00038: communicated to [REDACTED] that the denial of interview substantially impacted the timeline and district's

00039: ability to look into the allegations.

00040:

00041: Without sufficient initial details, the District interviewed [REDACTED] s counselor, dean, and assigned

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_2024 Title IX Sexual Harassment Complaint - Summary Report\_2\_2.txt lines 67-70

00067: investigate the allegations without the vital details for the allegations, it was unable to identify

00068: the respondent and/or find evidence to substantiate the allegations. In the absence of additional

00069: information from [REDACTED] identifying the respondent/s and/or providing essential details, this

00070: complaint is dismissed due to the District's inability to identify the respondent/s.

# N20-EX-011 - Mar. 13 E. Herman response all-attempts-declined framing

Generated source excerpt page 1

Date / production context: 2025-03-13

Source: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_March 13 2025 E. Herman

Response\_2\_2.txt

Source PDF: plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_March 13 2025 E. Herman

Response\_2\_2.pdf

Graph / case-file reference: Compliance graph case\_file\_id 336 / District attachment

Why relevant: Shows the District asserting all participation attempts were declined and that the investigation could not substantiate due to lack of concrete evidence.

Highlighted terms: all attempts were declined; could not substantiate; lack of concrete evidence;

District is unable to identify

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_March 13 2025 E. Herman Response\_2\_2.txt lines 52-58

00052: responsive data for the other requests outlined in the three emails has already been provided.

00053: 6. Investigation into claims of sexual harassment and assault

00054: The District made several attempts to gather information from your student, offering various

00055: options, including written responses in lieu of a live interview, but all attempts were declined. As

00056: a result, the investigation was limited by the absence of crucial details such as witness names,

00057: timelines, and evidence. Nevertheless, the District conducted a thorough investigation by

00058: interviewing staff and students associated with your student. Despite these efforts, the

plsas\_pst/attachments/district/emily/Emily\_Herman\_2025-03-13\_March 13 2025 E. Herman Response\_2\_2.txt lines 56-62

00056: a result, the investigation was limited by the absence of crucial details such as witness names,

00057: timelines, and evidence. Nevertheless, the District conducted a thorough investigation by

00058: interviewing staff and students associated with your student. Despite these efforts, the

00059: investigation could not substantiate the allegations due to the lack of concrete evidence and

00060: inability to identify the respondent/s. Attached you will find a written determination.

00061:

00062:

# N20-EX-012 - May 27 correction-denial persistence

Generated source excerpt page 1

Date / production context: 2025-05-27

Source: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-05-27\_May 27 2025 Response\_2\_2.txt

Source PDF: pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-05-27\_May 27 2025 Response\_2\_2.pdf

Graph / case-file reference: Compliance graph case\_file\_id 2450 / District attachment

Why relevant: Shows the District denied correction while repeating the 'father declined' phrasing and calling the record complete and not misleading.

Highlighted terms: father declined through an email exchange; complete, and not misleading; denies your request

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-05-27\_May 27 2025 Response\_2\_2.txt lines 14-20

00014: under FERPA..:

00015:

00016: Despitemultipleattemptsbythedistricttoarrangeaninterviewwiththestudent,

00017: the alleged victim's father declined through an email exchange.

00018:

00019: [REDACTED] did not report any concerns regarding her physical safety at school before

00020: theincident.TheonlymentionofissuesbyCOoccurredaftershehadalready

pldas\_pst/attachments/district/emily/Emily\_Herman\_2025-05-27\_May 27 2025 Response\_2\_2.txt lines 20-26

00020: theincident.TheonlymentionofissuesbyCOoccurredaftershehadalready

00021: withdrawn from the district.

00022:

00023: The District denies your request. The District has determined the data to be correct,

00024: complete,notinaccurate,andnotmisleading.Althoughyoudonotspecificallyallegethedatais

00025: .inviolationofthestudent'srightsofprivacy.(see34C.F.R.§99.20(a)),theDistrictconcludes

00026: that the data similarly does not violate your daughter's rights of privacy.

# N20-EX-013 - May 26 / June 10 production-copy persistence

Generated source excerpt page 1

Date / production context: 2026-05-26 / 2025-06-10 copy

Source: plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.txt

Source PDF: plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.pdf

Graph / case-file reference: Compliance graph case\_file\_id 2633 and later Robert Cothern production copy

Why relevant: Shows the same participation-blame language persisted into later District production copies, so the correction is not theoretical or stale.

Highlighted terms: [REDACTED] declined; all attempts were declined; could not substantiate; father declined through an email exchange

plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.txt lines 59-65

00059: Findings:

00060: The District made multiple efforts and offered various methods for [REDACTED] to provide information

00061: regarding the complaint, including the option to submit written responses to questions instead of

00062: participating in a live interview. However, [REDACTED] declined for [REDACTED] to provide this information. As a

00063: result of the District's inability to obtain details from [REDACTED] about the allegations, the investigation

00064: lacked crucial information such as witness names, involved students, respondent/s information,

00065: timelines, locations, and factual evidence necessary for a thorough examination. It was

plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.txt lines 151-157

00151: responsive data for the other requests outlined in the three emails has already been provided.

00152: 6. Investigation into claims of sexual harassment and assault

00153: The District made several attempts to gather information from your student, offering various

00154: options, including written responses in lieu of a live interview, but all attempts were declined. As

00155: a result, the investigation was limited by the absence of crucial details such as witness names,

00156: timelines, and evidence. Nevertheless, the District conducted a thorough investigation by

00157: interviewing staff and students associated with your student. Despite these efforts, the

plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.txt lines 155-161

00155: a result, the investigation was limited by the absence of crucial details such as witness names,

00156: timelines, and evidence. Nevertheless, the District conducted a thorough investigation by

00157: interviewing staff and students associated with your student. Despite these efforts, the

00158: investigation could not substantiate the allegations due to the lack of concrete evidence and

00159: inability to identify the respondent/s. Attached you will find a written determination.

00160: Closing

00161: Going forward, the District will only respond to data requests that are properly submitted. To

plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26 [REDACTED] Data Request File 8.txt lines 4429-4435

04429: statements because they are misleading, inaccurate, and in violation of [your] daughter's rights

04430: under FERPA..:

04431: Despite multiple attempts by the district to arrange an interview with the student,

04432: the alleged victim's father declined through an email exchange.

04433: [REDACTED] did not report any concerns regarding her physical safety at school before  
04434: the incident. The only mention of issues by [REDACTED] occurred after she had already  
04435: withdrawn from the district.

plsas\_pst/attachments/district/robert\_cothern/Robert\_Cothern\_2026-05-26\_2024 Title IX Sexual Harassment Complaint - Summary Report.txt lines 28-34

00028: Findings:

00029: The District made multiple efforts and offered various methods for [REDACTED] to provide information

00030: regarding the complaint, including the option to submit written responses to questions instead of

00031: participating in a live interview. However, [REDACTED] declined for [REDACTED] to provide this information.  
As a

00032: result of the District's inability to obtain details from [REDACTED] about the allegations, the investigation

00033: lacked crucial information such as witness names, involved students, respondent/s information,

00034: timelines, locations, and factual evidence necessary for a thorough examination. It was

**9. Complaint re: failure to comply with Title IX**

The District responded to this matter in Dr. Thomas' January 8, 2025 letter. Title IX does not require "an apology." The District has complied with applicable Title IX requirements.

**10. Delivery Failure Notification**

Your response is incorrect. Ms. Herman's 12/20 email does not state the block notification "was the result of an email the school sent to" you. It states that "delivery was unsuccessful to your email address, not a district email."

As you know from prior emails, the *sender* receives a failure notification. The District's server does not send a delivery failure notification to you when a District email is not delivered to you or not received by you. Our technology department states that you may have copied or sent that email to yourself, resulting in a delivery failure notification. Nonetheless, on January 18, 2025, Ms. Herman sent you copies of all emails sent from the District to your email address on December 13, 2024. You responded that you had received both emails.

To be complete in its response, the District has enclosed with this letter the raw header information for all emails received by District email accounts from your email address on December 13. If you sent additional emails on that date, please let me know.

**11. Request to initiate an investigation into violations of 506.1 and MN chapter 250E**

The District responded to this request in Dr. Thomas' January 8, 2025 letter.

You have clarified that you contend other students violated the bullying policy in their conduct toward [REDACTED]. The concerns raised in your November 1 email have already been investigated to the extent possible without interviewing [REDACTED]. Because the District has already investigated the allegations, it will not conduct a new investigation into the same facts.

**Email January 15, 2025, 6:01:46 a.m.**

**1. Written Determination for Discipline Complaint**

See response to January 9, 2025 Email, #3.

**2. Correction of Inaccurate Records**



See response to January 9, 2025 Email, #5.

**3. Results of Disciplinary Actions**

See response to January 9, 2025 Email, #2.

**4. Request for Records Documenting Safety Measures**

See response to January 9, 2025 Email, #6.

**5. Title IX Compliance and Investigative Process**

See response to January 9, 2025 Email, #9 (Title IX) and #11 (bullying).

**6. Policy 506.1 Violations and Failure to Investigate**

See response to January 9, 2025 Email, #11.

**Request for Immediate Action**

**1. Acknowledgment of this communication within one business day.**

Dr. Thomas acknowledged receipt of the email the same day.

**2. A detailed timeline for addressing each of the unresolved issues outlined above.**

The District denies this request as it is not required by policy or statute. Additionally, the District notes many of the issues are resolved. To the extent there is further disagreement about such a resolution, you have already indicated your awareness of **outside agencies to which complaints can be directed.**

**3. Clarification of any statutory or policy-based limitations that the District believes apply to its obligations.**

Dr. Thomas' January 8, 2025 letter and the above responses address the District's obligations. As indicated in the closing of that letter, the District is not interested in continuing to debate the applicability of various statutes and policies with you. If you disagree with the District's positions, you may avail yourself of other remedies pursuant to law.

**4. Assurance that all responses moving forward will be timely and meet the standards required under district policy and state and federal law.**



The District will respond to future requests only to the extent it is required to do so under the law and, if a timeline is directed by law, within such timeline.

Email on January 15, 2025, at 3:17 P.M.

To reiterate:

- **Policy 506.1 requires an investigator be appointed within three business days of a complaint. This deadline has already passed without action.**

See response to January 9, 2025 Email, #11.

- **Minn. Stat. § 13.04 Subdivision 4 requires action on data correction requests within 30 days, another deadline the District has missed.**

See response to January 9, 2025 Email, #5.

- **Minn. Stat. § 121A.61 and Title IX set clear requirements for prompt investigation and resolution of complaints, which remain unfulfilled.**

See response to January 9, 2025 Email, #4 (Minn. Stat. § 121A.61) and #9 (Title IX).

**Additionally, in the District's January 8th, 2025 response, it was acknowledged that the Discipline Complaint process would begin that day. This acknowledgment obligates the District to adhere to specific timelines, including:**

- 1. The appointment of an investigator within three business days, which should have occurred by January 11th, 2025.**
- 2. The provision of a written determination within ten business days, which would be due by January 22nd, 2025.**

The District stated it would review your complaint and consider appropriate action based on its policies. It did not commit to a "process" starting that day. Of note, neither Policy 103 nor Policy 506 (which contains the Discipline Complaint process) require appointment of an investigator within three business days or a written determination within ten business days.

The request to which Dr. Thomas' January 8, 2025 letter was responding to was the request in your January 4, 2025 email. The District's response is contained in #3 responding to your January 9, 2025 email.



**PRIOR LAKE-SAVAGE**  
AREA SCHOOLS

### **Closing**

The District does not have resources to continue to respond to your repeatedly evolving complaints couched under various headings within increasingly shortened unilateral timelines. District staff have patiently addressed each of your complaints in a reasonable time period. This is our final response to the topics outlined above.

Sincerely,

Michael Thomas

Superintendent



# Data Access Request

Joseph Kuboushek training, completion, and remediation records

|                                |   |
|--------------------------------|---|
| <b>Date submitted</b>          | June 22, 2026   |
| <b>Response violation date</b> | July 7, 2026  |
| <b>Deadline basis</b>          | MGDPA data-subject access deadline: 10 business days                |
| <b>Sender</b>                  | [REDACTED]  |
| <b>Recipient</b>               | Responsible Authority / Data Practices Compliance Official, ISD 719 |
| <b>Scope</b>                   | Joseph Kuboushek training, completion, and remediation records      |

This cover page is an index aid. The formal request body follows on the next page and controls the specific scope, authorities invoked, and requested action.

Dear Responsible Authority / Data Practices Compliance Official:

This is a formal request under the Minnesota Government Data Practices Act, Minnesota Statutes chapter 13, including sections 13.03, 13.04, and 13.43. I request public government data, public personnel data, segregable public portions of mixed records, and, to the extent responsive records are data about me or my minor child, private/data-subject and parent-access data under section 13.04, FERPA, and IDEA where applicable.

This transmission and its attachments contain private data about me and my minor child, including private education data and personally identifiable information from education records. I do not consent to the sharing, forwarding, review, consultation, disclosure, or use of this data with or by any person or entity that is not category-mapped to a valid District-published, District-maintained FERPA exception applicable to the relevant school year and record universe.

If the District discloses or permits access without consent, please preserve and identify the maintained basis for that access, including the recipient, role, purpose, record category, applicable FERPA/MGDPA authority, annual-notice category, category mapping, legitimate educational interest, and any direct-control or redisclosure limitation relied upon.

This request seeks existing records concerning Joseph Kuboushek / Joe Kuboushek and **required, assigned, completed, overdue, remedial, corrective, supervisory, or post-incident training** or professional-development records from November 1, 2024 through June 22, 2026.

This request is prompted by the District's represented record universe concerning intake, routing, and response to a 2024-2025 sexual-violence / sexual-harassment / student-safety complaint involving my child. The request does not ask the District to create a new explanation, assess performance after the fact, or disclose private personnel data that is not accessible to me. It asks for maintained records that already show what training, supervision, corrective action, or post-incident improvement records exist.

Please search records maintained by Human Resources, building administration, Title IX/Human Rights/Policy 506.1 channels, Policy 414/maltreatment channels, student-support/student-safety channels, compliance/data-practices channels, professional-development systems, vendor training platforms, SafeSchools/Vector or similar training systems, Google Workspace/Drive/Forms/Sheets, Skyward or HR/payroll/personnel systems, supervisor files, investigation files, complaint files, and any other system or custodian reasonably likely to maintain responsive data.

Please produce the following existing records and data:

1. Public personnel-data fields showing Joseph Kuboushek's education and training background, work-related continuing education, job title, job description, work assignment, work location, and any role requirements applicable to complaint intake, student-safety reporting, mandated reporting, Title IX/sexual-harassment intake, discrimination/harassment/bullying intake, Policy 506/506.1 intake, Policy 414/maltreatment reporting, discipline, building-administrator response, accessibility/accommodation assistance, electronic complaint submission, complaint-form access, complaint-platform navigation, or parent/student complaint routing.

2. Training-completion records, certificates, rosters, attendance records, logs, acknowledgments, transcripts, module-completion records, course assignments, vendor-platform records, due dates, completion dates, scores if public or accessible to me, noncompletion/overdue records, reminders, escalations, supervisor notices, and

completion-verification records for any required or assigned training completed or due by Joseph Kuboushek from November 1, 2024 through June 22, 2026.

3. Records identifying any annual, recurring, required, role-based, building-administrator, principal/dean, complaint-intake, student-safety, mandated-reporting, maltreatment, Title IX, sexual harassment, sexual violence, hostile-environment, bullying, discrimination, retaliation, trauma-informed response, student discipline, parent-complaint, accessibility, Section 504/ADA access, electronic complaint reporting, complaint-form access, complaint-system navigation, privacy, FERPA/MGDPA, data-practices, or education-record training Joseph Kuboushek was required or expected to complete during the covered period.

4. Records showing whether Joseph Kuboushek completed, failed to complete, completed late, was exempted from, was not assigned, or was excused from any training in item 3, including records showing the reason for any exemption, nonassignment, noncompletion, late completion, or waiver if maintained and public or accessible to me.

5. Records showing any remedial, corrective, coaching, supervision, retraining, counseling, review, conference, directive, performance-improvement, administrative-review, or post-incident training assigned, recommended, discussed, required, completed, declined, or not completed by Joseph Kuboushek in connection with:

- intake, routing, response, documentation, or escalation of a sexual-violence, sexual-harassment, harassment, discrimination, bullying, retaliation, student-safety, or maltreatment complaint;
- failure or alleged failure to create, locate, preserve, route, identify, or produce a maltreatment report, mandated-reporting record, Title IX intake record, Policy 506/506.1 intake record, Policy 414 record, student-safety record, or complaint-routing record;
- failure or alleged failure to provide assistance, accessible routing, complaint-form access, electronic-submission assistance, complaint-system navigation, alternate submission options, or meaningful access for a parent/student attempting to submit, route, clarify, or pursue a Title IX, harassment, discrimination, bullying, maltreatment, student-safety, accessibility, or related complaint;
- parent notice, student-support response, investigation referral, discipline referral, administrator involvement, or records-response issues concerning my child or the 2024-2025 complaint universe.

6. Public data showing the existence and status of any complaint, charge, corrective-action process, training assignment, supervisory review, or administrative review involving Joseph Kuboushek that concerns the subject areas in item 5, regardless of whether it resulted in discipline. For any disciplinary action that reached final disposition, please produce the final disposition, the specific reasons for the action, and public data documenting the basis for the action to the extent public under section 13.43.

7. Any settlement, separation, reassignment, leave, resignation, nonrenewal, release, no-rehire, neutral-reference, claims-release, corrective-action, remediation, or similar agreement or term involving Joseph Kuboushek that resolved or related to a complaint, charge, dispute, training failure, administrator-performance issue, student-safety issue, mandated-reporting issue, Title IX/sexual-harassment issue, maltreatment issue, or complaint-intake/routing issue during the covered period, to the extent classified as public under section 13.43.

8. Public policies, procedures, checklists, decision trees, guidance, role descriptions, training matrices, administrator onboarding materials, annual-compliance-training lists, professional-development requirements, or vendor course catalogs identifying what training District administrators such as Joseph Kuboushek were required to have for the subject areas in this request.

9. Public policies, procedures, checklists, forms, electronic-form instructions, website instructions, helpdesk/intake instructions, administrator scripts, accessibility procedures, Section 504/ADA access procedures, alternate-submission procedures, Title IX intake procedures, complaint-routing procedures, and training materials explaining how District administrators were expected to assist a parent or student who reported difficulty accessing, completing, submitting, routing, or confirming receipt of an electronic Title IX, harassment, discrimination, bullying, maltreatment, student-safety, accessibility, or related complaint.

10. Records sufficient to identify the maintained custodian, system, title, date, record type, classification asserted, and withholding/redaction basis for any responsive training, supervisory, corrective-action, complaint, discipline, settlement, procedure, accessibility, electronic-reporting, or status-change record withheld in whole or in part.

This request seeks existing government data in the form, program, database, filing system, or ordinary export in which the District maintains them. It does not request a newly authored narrative, new investigation, new legal conclusion, custom calculation, or custom report. A native or ordinarily available export reproducing existing stored fields is acceptable.

If the District contends any requested output would require creation of new data, please identify the particular subpart affected, the existing responsive underlying data and fields the District maintains, the form or program in which those data are maintained, and the specific transformation the District contends would create new data. Please still provide or permit inspection of the responsive underlying data in maintained form.

If no responsive public data or accessible private/data-subject data exist for a category above, please state that no responsive data exist for that category. If responsive data exist but are withheld or redacted, please identify the withheld or redacted item, whether withholding is full or partial, the responsible custodian if known, and the specific statutory section, temporary classification, or federal-law provision relied on. If access is denied, please certify the denial in writing under Minnesota Statutes section 13.03, subdivision 3.

Please produce records electronically by email. If any fee will be charged for copies or electronic transmittal, please provide an itemized estimate before incurring the cost. I request electronic copies where reasonably available and inspection access where copies would require unnecessary cost.

Because this request includes public government data, please provide inspection access promptly under section 13.03. To the extent any responsive data are data about me or my minor child, section 13.04, subdivision 3 requires response immediately if possible, or no later than ten business days, excluding Saturdays, Sundays, and Minnesota legal holidays. If received on June 22, 2026, that ten-business-day deadline is July 7, 2026.

Sincerely,

[REDACTED]