

October 27, 2021

BY EMAIL

Neosho County Community College
c/o Brian Inbody, President
binbody@neosho.edu

Re: Public-Records Request Related to Your Accreditation Review of Eastern Gateway Community College as a Team Member for The Higher Learning Commission

Dear President Inbody:

Our law firm represents Rhode Island Institute for Labor Studies and Research (“ILSR”). Among numerous other civil rights and union groups, our client is a stakeholder in a college benefit program offered by Eastern Gateway Community College (“EGCC”), a community college in Ohio. It is our understanding that you participated in a November 2020 mid-cycle peer accreditation review of EGCC on behalf of The Higher Learning Commission (“HLC”), are an employee of Neosho County Community College (“Neosho”) and may keep certain records relevant to that accreditation review at Neosho, either in hard copy or electronically on Neosho servers.

We are aware of numerous complaints relating to a November 2020, mid-cycle peer accreditation review of EGCC conducted by HLC. Indeed, more than thirty civil-rights and labor organizations—including ILSR—have expressed concerns and objections about that review. These concerns have been raised with HLC’s president and other staff, but HLC has not investigated. The civil-rights and labor groups have also—together with Congressman Tim Ryan—raised concerns with the U.S. Department of Education, which has requested documents from HLC regarding the same.

In light of these events, our firm has been retained to investigate the conduct of HLC’s representatives during the November 2020 review as well as HLC’s response, or lack thereof, to the complaints that it received.

We write today to make a public-records request to Neosho—a public office under relevant public-records law—for relevant public records in Neosho’s possession, custody, or control that may contain evidence relevant to the above matter.

Flannery | Georgalis, LLC makes this public-records request on its own behalf to demand the production of certain public records created, controlled, maintained, or in your possession at Neosho, a public office and institution. We ask that Neosho respond within seven days of receiving this letter.

Specifically, we demand the following records, which includes but is not limited to any and all documents, correspondence, email, text messages, notes, chats, reports, memoranda, voicemails, analyses, and schedules, regardless of whether those items are electronic or otherwise, concerning, regarding, or relating to:

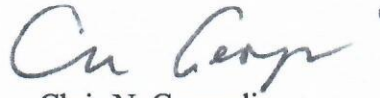
- The November 2020 mid-term accreditation review of Eastern Gateway Community College, including, but not limited to, all communications to or from any HLC representative (including you) regarding the review;
- The selection of the review team (including you) assigned to EGCC for its November 2020 mid-term accreditation review;
- The Commission's decision to use a "hybrid model" combining in-person and virtual elements for EGCC's visit, including correspondence to and from you about that decision and how the "hybrid model" would be carried out in practice;
- The Commission's decision to assign Dr. Haseeb Ahmed as the on-site reviewer;
- Correspondence between and among you, Dr. Ahmed, and HLC employees;
- Correspondence between and among you, Dr. Ahmed, and other members of the accreditation-review team;
- Karen Solomon's communications to the review team (including you) regarding EGCC's visit, including but not limited to any instructions, guidance, directions, Ms. Solomon provided to the team; and
- The review team's analysis of EGCC's financials, including those documents which support the Commission's statement that EGCC was operating at a deficit, despite financial statements to the contrary.

[signature follows]

President Brian Inbody
October 27, 2021
Page 3 of 3

Should you have any questions or should you like to discuss the above further, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink that reads "Chris N. Georgalis". The signature is written in a cursive, flowing style.

Chris N. Georgalis

o 216.367.2095

c 216.374.1890

chris@flannerygeorgalis.com