

**EXHIBIT 2**

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**BEFORE THE STATE PUBLIC CHARTER SCHOOL AUTHORITY**  
**STATE OF NEVADA**

In Re:

Nevada Connections Academy Notice of  
Closure or Possible Board Reconstitution

**HEARING:**

**Date: October 23-25, 2017**

**Time: 8:30 AM**

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**DECLARATION OF JEANETTE SPARKS**

I, Jeanette Sparks, hereby declare under penalty of perjury as follows:

1. I am the assistant to Laura K. Granier and Erica K. Nannini of Holland & Hart LLP, counsel for Nevada Connections Academy (“NCA”). The matters set forth in this declaration are based on my own personal knowledge. If called upon to testify, I am competent to testify to the matters set forth herein.

2. On August 10, 2017, NCA sent a public records request to Jason Guinasso, Chair of the State Public Charter School Authority Board (hereinafter, the “August 10 PRR”). The request asked for “all communications, correspondence, documentation, notes, or information of any kind, including emails and text messages, between Patrick Gavin and any State Public Charter School Authority Board Member from May 25, 2017, to the date and time Staff receives [the] request....”

3. On August 25, 2017, in response to the August 10 PRR, the Authority produced 6 documents. One of the document produced, titled “Per Your Request,” was an email dated August 9, 2017 from Patrick Gavin to Jason Guinasso which contained a link to a Google Drive folder. The Google Drive folder contained over 800 pages of documents in 7 PDF files.

4. On August 29, 2017, NCA sent a public records request to the State Public Charter School Authority Board (hereinafter, the “August 29 PRR”). The request asked for “all

1 documents that Board Member Jason Guinasso has reviewed, requested, or considered relative to  
2 NCA beginning May 25, 2017....”

3 5. On September 15, 2017, in response to the August 29 PRR, the Authority  
4 produced a link to a Dropbox folder, which contained a written response to the August 29 PRR  
5 listing several documents that Mr. Guinasso reviewed, and also contained 8 PDF files. The  
6 Authority’s response also noted that Mr. Guinasso’s handwritten notes from the hearings are not  
7 considered public records and therefore would not be produced.  
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9 6. On September 11, 2017, NCA filed a Motion for an Order Allowing Prehearing  
10 Discovery requesting, *inter alia*, documents and information Chair Guinasso reviewed, requested  
11 or considered relative to NCA. In the Order Granting in Part/Denying in Part NCA’s Motion  
12 Requesting Discovery, the Chair granted NCA access to his handwritten notes (referenced  
13 above) for inspection and copying. Erica Nannini reviewed the notes and requested copies of 33  
14 pages of documents. Contained within Mr. Guinasso’s notes were two Staff Briefing Memos  
15 dated April 28, 2017 regarding Discovery Charter School.  
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17 7. I have reviewed the documents produced by the Authority in response to the  
18 August 10 PRR, the August 29 PRR, and the two staff briefing memos contained in Chair  
19 Guinasso’s notes. Attached is an index of those documents. The index notes which of the  
20 documents reviewed by Chair Guinasso are part of the record in this case and reflects that certain  
21 of the documents Chair Guinasso requested from Patrick Gavin and were provided on August 9,  
22 2017 were not included in the documents Chair Guinasso identified in his order on discovery in  
23 this proceeding.  
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I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct and was executed this 16<sup>th</sup> day of October, 2017, in Reno, Nevada.

  
JEANETTE SPARKS

**DOCUMENTS REVIEWED BY J. GUINASSO  
(AS NOTED IN RESPONSES TO PUBLIC RECORDS REQUESTS)**

Source	Description	Part of Record?	Hearing Exhibit No.
Docs produced 9/15/17 in response to 8/29/2017 PRR	Double Eagle Amendment Approval April 22, 2015	No	
	NCA Application, October 2006	No	
	NCA Charter Agreement, May 2013	Yes	Staff 7 NCA C
	NCA Renewal Application, November 2012	No	
9/15/17 PRR Written Response (in response to 8/29/2017 PRR)	Transcripts of May 2017 hearing	Yes	
	Documents uploaded to the SPCSA website for May hearing	Yes, but some NCA docs were excluded at hearing	
	Documents in evidence binders for August hearing	Yes	
	Transcript of May hearing	Yes	
	Closing arguments and their exhibits	Yes	
	NCA charter and charter amendment you sent me in response to my specific request	Only the 2013 Charter Agreement is part of the record; the original agreement and subsequent amendments are not	
8/9/17 "Per Your Request" Email from Gavin to Guinasso with link to files (produced via Google Drive in response to 8/10/17 PRR): <i>(PDF Compilation entitled "Additional Communication from NCA Charter App Binder")</i>	1/24/2012 Letter from Granier to Canavero requesting approval of a charter amendment regarding the school's annual goals (15 pages)	No	
	1/9/2007 Fax from Keith Rheault to Tom McCormack transmitting memo from Keith Rheault to Jamie Castle regarding Distance Education Program and Course Review (11 pages)	No	

Source	Description	Part of Record?	Hearing Exhibit No.
<p>(PDF Compilation entitled "Communications from Toms folder in Filing Cabinet")</p>	May 2013 Charter School Agreement (6 pages)	Yes	Staff 7 NCA C
	12/30/2008 Letter from Tom McCormack to Jamie Castle transmitting signed copy of revised Charter School Agreement (8 pages)	No	
	1/12/2007 Fax from Keith Rheault to Tom McCormack transmitting memo from Keith Rheault to Jamie Castle regarding Distance Education Program and Course Review (2 pages)	No	
	May 2013 Charter School Agreement (6 pages)	Yes	Staff 7 NCA C
	2/4/2015 Request to Limit Enrollment approval documents (11 pages)	No	
	May 2007 Charter School Agreement (5 pages)	No	
	June 25, 2013 Distance Education Program approval (2 pages)	No	
	2008-2012 documents regarding annual report of compliance/performance audits (112 pages)	No	
	Documents related to 2013 Nevada Connections Academy Charter School contract with Connections Academy of Nevada LLC (42 pages)	No	
	Documents related to 2014 appointment of Laura Fillmore to the Board (9 pages)	No	
	3/17/2014 Letter from S. Werlain, NCA to NDE - response to pupil enrollment and attendance audit (2 pages)	No	
	9/16/2013 Letter related to appointment of Board member Kirsten Liebendorfer (2 pages)	No	

Source	Description	Part of Record?	Hearing Exhibit No.
	Undated Memo from Canavero to Werlein re Charter School Performance Framework (2 pages)	Yes	NCA D
	9/4/2013 Letter related to appointment of Board member Jafeth Sanchez (2 pages)	No	
	7/22/2013 Request to Limit Enrollment (5 pages)	No	
	2012-2013 EMO Report (3 pages)	No	
	Documents related to 2011-2012 annual performance audit (5 pages)	No	
	2011-2012 EMO Report (3 pages)	No	
	1/24/2012 Letter from Granier to Canavero requesting approval of a charter amendment regarding the school's annual goals (annotated) and related documents (12 pages)	No	
	10/31/2011 Letter from Granier to Canavero re compliance with AB 171 – make up of Board (2 pages)	No	
	9/1/2011 approval of request to limit enrollment (6 pages)	No	
	8/15/2011 Letter from J. Castle, NCA, to Keith Rheault – request to limit enrollment (4 pages)		
	2/7/2011 NDE Letter to Cotner (NCA) re request for special accommodation for student (1 page) [student's name redacted]	No	
	September 2010 documents re parent complaint (9 pages) [student's name redacted]	No	
	June 2010 Request to NDE for NCA board meeting agendas and related docs (4 pages)	No	
	Typed Notes – Reaction to Laura Granier's NRG letter on behalf of Nevada Connections Academy (2 pages)	No	

Source	Description	Part of Record?	Hearing Exhibit No.
	2/19/2010 Letter to NCA re request for special accommodation (2 pages) [student's name redacted]	No	
	11/23/2009 Email from McCormack to Krummel (NCA) re revisions to bylaws (1 page)	No	
	11/4/2009 Letter to NCA re request for special accommodation (3 pages) [student's name redacted]	No	
	6/3/2009 Email string between Krummel and McCormack re corrective actions (1 page)	No	
	2008-2009 Final Audit Report of pupil enrollment and attendance (17 pages) [students' names redacted]	No	
	3/31/2009 Letter from McCormack, NDE to Krummel re Item 25 of charter agreement (2 pages)	No	
	3/17/2009 Letter from McCormack, NDE to Granier transmitting revised charter school agreement (1 page)	No	
	12/2/2008 Email string between Granier and McCormack re NCA charter amendment (2 pages)	No	
	11/26/2008 Memo from K. Rheault to Butz, NCA re Approval of Contractor for the Independent Parent Satisfaction Survey (1 page)	No	
	11/26/2008 Letter from K. Rheault to J. Castle (NCA) re enrollment after count day (1 page)	No	
	10/24/2008 Email from A. Swann (NDE) to C. Butz (NCA) re SAIN Training (2 pages)	No	



Source	Description	Part of Record?	Hearing Exhibit No.
	7/23/2008 Nevada Charter School Federal Grant Program Evaluation Form – Cover Sheet (1 page)	No	
	Narrative of Grant Accomplishments (7 pages)	No	
	8/14/2008 Email from James E. Irvin to William Arensdorf; Thomas McCormack transmitting Draft Settlement Agreement between NCA and SBE (7 pages)	No	
	10/17/2008 Email from Butz to Rheault; Thomas McCormack re enrollment status of student (1 page) [student's name redacted]	No	
	10/23/2008 Email from McCormack to Shawn Franklin; Andrew Swann, cc: William Arensdorf re SAIN and Bighorn Portal training (1 page)	No	
	10/13/2008 Email from Lori Johnson to McCormack re closing enrollment after count day (1 page) [student's name redacted]	No	
	10/7/2008 Email from McCormack to Rheault; Arensdorf; Lori Johnson; Albert Kenneson re closing enrollment after count day (1 page)	No	
	9/17/2008 email from Tami Duggan to Donna Brothers; McCormack, cc: Justin Andres; Craig Butz; Gerald Krummel; Josh Solomon; Brian Leap re NCLB compliance report for NCA (1 page)	No	
	8/6/2008 Fax to McCormack from Justin, NCA, including NCA Calendar for 2008-2009 School Year (2 pages)	No	
	8/7/2008 Email from Diane Mugford to Butz, et al., cc: McCormack, et al. re Weekly SAIN/APAC Conference Calls (1 page)	No	

Source	Description	Part of Record?	Hearing Exhibit No.
	6/17/2008 Email from Carol White to McCormack transmitting compliance letter from the health department (2 pages)	No	
	6/12/2008 Email from Carol White to Donna Brothers, cc: McCormack re compliance reporting for Highly Qualified teachers (1 page)	No	
	6/30/2008 Email from Rheault to A. Bayouth, re grading dispute (2 pages)	No	
	3/24/2008 Email from Rheault to Carol White, cc: McCormack, et al. re: Special Ed Audit (1 page)	No	
	3/24/2008 Email from Rheault to White, cc: McCormack re: approval of enrollment waiver request (2 pages)	No	
	3/17/2008 Letter from White to Ms. Brothers with two Teaching Outside Field(s) of Preparation requests (3 pages) [SSN redacted]	No	
	2007-2008 School Year NCLB Report of Not Highly Qualified Core Curriculum Instructors (1 page)	No	
	Department of Education Teacher Licensing System-02/16/2008 Exception Report by School 2007/2008 (1 page)	No	
NCA Application	NCA Application October 2006 (363 pages)	No	
NCA Charter Agreement-signed	NCA Charter Agreement May 2013 (6 pages)	Yes	Staff 7 NCA C
NCA Charter Renewal Application	NCA Charter Renewal Application 11/27/12 (137 pages)	No	

Source	Description	Part of Record?	Hearing Exhibit No.
Old NCA Management Agreement	Restated and Renewed Education Products and Services Agreement Between Connections Academy of Nevada LLC and Nevada Connections Academy, dated May 17, 2011 and June 7, 2011 and effective July 1, 2011 (28 pages)	No	
<b>Handwritten Notes produced by Chair Guinasso (pursuant to the Order on Discovery Motion)</b>	04/28/2017 Staff Briefing Memorandum regarding Agenda Item 5 regarding Discovery Charter School (2 pages)	No	
	04/28/2017 Staff Briefing Memorandum regarding Agenda Item 5 regarding Discovery Charter School Request to Convert from Written Charter to a New Six Year Charter Contract (3 pages)	No	