



STATE OF INDIANA

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November 25, 2025

Re: Complaint 25-FC-074
Eric Skeens (Complainant) v.
Mississinewa Community Schools (Respondent)

This advisory opinion is issued in response to the above-referenced complaint dated April 4, 2025.

A Notice of Complaint, along with a copy of the complaint, was sent to the Respondent on October 14, 2025, requesting a formal response by November 12, 2025. A formal response, submitted by Michelle L. Cooper of Lewis Kappes on behalf of Respondent, was received in this office on November 12, 2025.

The complaint alleges that Respondent violated the Access to Public Records Act (APRA) by failing to provide copies of records due to the request lacking "reasonable particularity" in identifying the records to be provided.

ANALYSIS

The public policy of APRA states that "(p)roviding persons with information is an essential function of a representative government and an integral part of the routine duties of public officials and employees, whose duty is to provide the information." Indiana Code (IC) 5-14-3-1.

Complainant filed a request for copies of public records on April 2, 2025. The request sought all emails sent or received from more than 20 different staff and/or board members' school email accounts from January 1, 2025 to March 21, 2025. The Respondent denied the records request on April 3, 2025, explaining that the request was not reasonably particular, and asked for him to narrow the request, including an offer to start the process upon receiving the revised information. Emails went back and forth a few times with Respondent giving a list of items to be included. However, Complainant did not include key words or a particular incident, issue, event or topic, but did add the email address of the superintendent who was responding to him. Respondent issued another denial on April 4, 2025, for lack of particularity because no search terms were given.

In its response, Respondent stated that the record request generally lacked reasonable particularity in order to identify the records being requested.

APRA requires that record requests “must identify with reasonable particularity the records being requested.” Indiana Code 5-14-3-3(a)(1). The statutes do not define the term “reasonable particularity”.

Respondents denied the record request based upon the lack of reasonable particularity. Respondent’s formal response cited an advisory opinion of this office that opined that emails are a “method of communication and not a type of record; requests for records that only identify the records by method of communication only are not reasonably particular.” The Complainant sought all emails to or from more than 20 different staff and/or board members’ school email accounts from January 1, 2025 to March 21, 2025, but did not identify key words or the other party the email - recipients or senders.

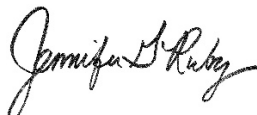
The Indiana Court of Appeals addressed the meaning of the phrase, “reasonable particularity” in *Jent v. Fort Wayne Police Dept*, 973 N.E.2d 30 (Ind. Ct. App. 2012) which involved a request for daily incident logs. The court concluded that reasonable particularity in a record request “turns in part, on whether the person making the request provides the agency with information that enables the agency to search for, locate, and retrieve the records.”

This office has given guidance on the four (4) aspects of what is required to identify emails for purposes of record requests. The aspects are 1) a named sender; 2) a named recipient; 3) a reasonable time frame (e.g. six months or less) and 4) a subject matter or set of unique and connected words. *Wolfe v. Indiana State Police*, Formal Advisory Opinion 23-FC-59. In *Anderson v. Huntington County Bd. Of Commissioners*, 983 N.E.2d 613 (Ind. Ct. App. 2013), the Indiana Court of Appeals held that an identified sender and recipient of an email are necessary for a request to satisfy APRA’s reasonable particularity standard.

Complainant, after filing the complaint, supplied additional information that narrowed the record request on or about April 16, 2025. Respondent fulfilled the record request, based upon the new parameters, and supplied the responsive records to Complainant.

CONCLUSION

This office finds that Respondent did not violate APRA by failing to provide records as requested for the reasons stated herein.



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