



January 7, 2026

Attorney General Keith Ellison  
C/O Anya Pavlov-Shapiro  
445 Minnesota Street #600  
St. Paul, MN 55101

**RE: Government Data Practices Request about Attorney General's Minneapolis daycare fraud investigation**

Dear Ms. Pavlov-Shapiro:

This is a formal Request for access to government data under the Minnesota Government Data Practices Act, MINN. STAT. § 13. It is made by the American Center for Law and Justice ("ACLJ")<sup>1</sup> on behalf of its supporters.

To summarize, this Request seeks records pertaining to the Attorney General's knowledge or findings in any ongoing or pending fraud investigations regarding Minneapolis daycares.

### **RECORDS REQUESTED**

For purposes of this Request, the term "record" means "any information" that qualifies under MINN. STAT. § 13, and includes, but is not limited to, the original or any full, complete and unedited copy of any log, chart, list, memorandum, note, correspondence, writing of any kind, policy, procedure, guideline, agenda, handout, report, transcript, set of minutes or notes, video, photo, audio recordings, or other material. The term "record" also includes, but is not limited to, all relevant information created, stored, received or delivered in any electronic or digital format, e.g., electronic mail, instant messaging or Facebook Messenger, iMessage, text messages or any other means of communication, and any information generated, sent, received, reviewed, stored or located on a government *or private* account or server.

For purposes of this Request, all terms otherwise used herein have the definitions given by the Government Data Practices Act, MINN. STAT. § 13.02.

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<sup>1</sup> The ACLJ is a not-for-profit 501(c)(3) organization dedicated to the defense of constitutional liberties secured by law. The ACLJ regularly monitors governmental activity and works to inform the public of such affairs. The ACLJ and its global affiliated organizations are committed to ensuring governmental accountability and the ongoing viability of freedom and liberty in the United States and around the world.

**For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is January 1, 2020, to the date this request is processed.**

The ACLJ hereby requests the Attorney General's office to produce the following records, physically or electronically:

1. Any and all records discussing federal or state investigations or pending federal or state investigations into fraudulent activity or conduct in violation of any contractual or funding requirements by Quality Learning Center, Inc. or Quality Learning Center, if so titled, (1411 Nicollet Ave., Minneapolis, MN 55403) and Nokomis Daycare Center, Inc. (4010 Bloomington Ave., Minneapolis, MN 55407).
2. Any and all records of active childcare operations at Quality Learning Center, Inc. (or Quality Learning Center, if so titled), and Nokomis Daycare Center, Inc., respecting child privacy *but excluding any personal identifiers of children*, including (1) enrollment numbers, (2) attendance records, (3) tuition or payments for attendance (if applicable), and (4) proof of curriculum since 2020.

#### **REQUEST FOR WAIVER OF FEES**

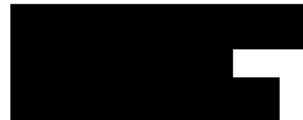
The ACLJ requests a waiver of all fees for this request. Disclosure of the requested information to us is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in our commercial interest. The documents requested are to provide transparency on any ongoing or pending investigations of the daycare fraud occurring in Minneapolis. Thank you for your consideration of this request.

#### **CONCLUSION**

If this Request is denied in whole or in part, the ACLJ requests that, within the time requirements imposed by the Minnesota Government Data Practices Act, you support all denials by reference to specific Government Data Practices Act exemptions and provide any judicially required explanatory information.

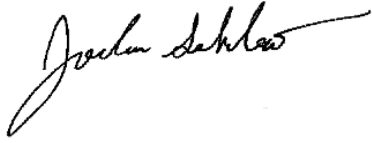
Thank you for your prompt consideration of this Request. Please furnish all applicable records and direct any responses to:

Jordan Sekulow, Executive Director  
Benjamin P. Sisney, Senior Litigation Counsel  
John A. Monaghan, Senior Litigation Counsel  
American Center for Law and Justice



I affirm that the foregoing request and attached documentation are true and correct to the best of my knowledge and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jordan Sekulow". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Jordan Sekulow  
Executive Director

A handwritten signature in blue ink, appearing to read "John A. Monaghan". The signature is cursive and somewhat stylized, with a long horizontal stroke at the end.

John A Monaghan  
Senior Litigation Counsel

A handwritten signature in black ink, appearing to read "Ben P. Sisney". The signature is cursive and somewhat stylized, with a long horizontal stroke at the end.

Benjamin P. Sisney  
Senior Litigation Counsel