



OFFICE OF THE ATTORNEY GENERAL
CONNECTICUT

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September 2, 2022

Sent via FedEx

James O'Keefe, President
Project Veritas
1214 W Boston Post Road No. 148
Mamaroneck, NY 10543

Re: *Investigation of the Greenwich Public Schools*

Dear Mr. O'Keefe:

The Connecticut Office of the Attorney General has opened a civil rights investigation into the possibility of discriminatory employment practices in the Greenwich Public Schools.

This letter is your notice to preserve all material potentially relevant to this investigation.¹ You must take immediate action to prevent the deletion or spoliation of any such material.² The obligations detailed here extend to you and all of your employees and agents.

We anticipate issuing subpoenas for relevant material. If our investigation substantiates a pattern or practice of illegal conduct, we may initiate appropriate litigation to enforce federal and state law.

Right now, our investigation centers on comments apparently made by Greenwich Public Schools official Jeremy Boland concerning age and religious discrimination in hiring. At a minimum, the investigation will cover the period from Mr. Boland's first employment with the Greenwich Public School system to the present. The scope and nature of our investigation may evolve as it progresses.

¹ "Material" includes information, documents, recordings, video recordings, and communications of any kind, however stored. It includes electronically stored information of any kind, including information on computers, handheld devices, and smartphones. It also includes digital messages, emails, text messages, instant messages, social media posts, communication using private messaging applications, calendars, phone and cellphone logs, voicemail messages, and other digital or online communications.

² This immediate action must include, but is not limited to, holding in abeyance any existing document retention and/or destruction policies or practices, or any other actions that would result in the deletion of any material; stopping the automatic deletion of emails, text messages and other electronic data; securing and preserving all relevant communications, whether stored on internal servers or cloud-based platforms; and securing and preserving all computer or electronic hardware, including all hard drives, laptops, smartphones, or any other similar equipment and devices, whether company-owned or personal.

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The material relevant to this investigation includes all material relating to the Greenwich Public Schools and all material relating to Mr. Boland, including communications to, from, including, or concerning Mr. Boland.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Gregory K. O'Connell
Deputy Associate Attorney General

GKO:lcs

cc: Joshua Perry, Solicitor General / Chief of the Division of Appeals