

COPY

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, COUNTY OF DAVIDSON

ALVIN BONDS II, Ph.D.,)
)
Petitioner,)
)
v.)
)
TENNESSEE DEPARTMENT OF)
FINANCE AND ADMINISTRATION,)
)
Respondent.)

No.: 26-0251-I

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PETITION FOR ACCESS TO PUBLIC RECORDS

Petitioner Alvin Bonds II, Ph.D. (“Petitioner”), a citizen and resident of Madison County, Tennessee, pursuant to the Tenn. Code Ann. § 10-7-505, hereby petition this Court for judicial review of the denial by the Tennessee Department of Finance and Administration (“Department”) of his request for access to public records. Petitioner submitted a public records request under the Tennessee Public Records Act (“TPRA”), Tenn. Code Ann. § 10-7-503 et seq., concerning the transparency and governance of artificial intelligence systems used or endorsed by Tennessee state government, and the degree to which those systems align with the National Institute Standards and Technology (NIST) Artificial Intelligence (AI) Risk Management Framework (RMF 1.0) and related standards.

Petitioner petitions this Court to obtain access to requested public records and an order from this Court finding that the denial of public access to these records is unlawful. In support of such petition, Petitioner states as follows:

PARTIES

1. Petitioner Alvin Bonds II, Ph.D. is an adult citizen of the State of Tennessee, and resident of Madison County. He is a licensed mental health counselor and counselor educator serving rural West Tennessee.

2. Respondent Tennessee Department of Finance and Administration (“Department”) is a state government agency of the State of Tennessee, including its division Strategic Technology Solutions (“STS”) and its Tennessee AI Advisory Council, with offices located at the William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue N., Nashville, Tennessee 37243. The Department is a “governmental entity” as defined by Tenn. Code Ann. § 10-7-301(2) and is subject to the TPRA. Its chief executive officer is the Commissioner, who for the purposes of this action is Jim Bryson. The Department may be served through Commissioner Jim Bryson or General Counsel Lucian D. Geise, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue N., 19th Floor, Nashville, TN 37243.

JURISDICTION AND VENUE

3. This Court has jurisdiction pursuant to Tenn. Code Ann. § 10-7-505, which grants any citizen of Tennessee who has been denied access to public records the right to petition the chancery court of the county in which the records are located for enforcement of the TPRA.

4. Venue is proper under Tenn. Code Ann. § 10-7-505, in Davidson County, because the requested public records are in the custody and control of the Department. Respondent has indicated that responsive records exist and are available, creating a presumption that physical records are maintained and available for inspection at the Department's physical location in Davidson County, and any responsive electronic or digital records can be accessed, reviewed, and produced through the Department's office located in Davidson County.

BACKGROUND

5. The Tennessee Public Records Act (“TPRA”) provides: “[A]ll state, county and municipal records shall...be open for personal inspection by any citizen of this state, and those in charge of the records shall not refuse such right of inspection to any citizen, unless otherwise provided by state law.” Tenn. Code Ann. § 10-7-503(a)(2)(A).

6. The TPRA defines “public record” to “[m]ean[] all documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental entity.” Tenn. Code Ann. § 10-7-503(a)(1)(A)(i).

7. The TPRA further provides that “[i]nformation made confidential by state law shall be redacted wherever possible, and the redacted record shall be made available for inspection and copying.” Tenn. Code Ann. § 10-7-503(a)(5).

8. “The burden of proof for justification of non-disclosure of records sought shall be upon the official and/or designee of the official of those records and the justification for the non-disclosure must be shown by a preponderance of evidence.” Tenn. Code Ann. § 10-7-505(c).

9. The TPRA makes clear that there is a presumption of openness and that the Act “shall be broadly construed so as to give the fullest possible public access to public records.” Tenn. Code Ann. § 10-7-505(d).

STATEMENT OF FACTS

10. Petitioner submitted a written public records request to the Department pursuant to the TPRA on January 22, 2026, requesting access to six categories of records relating to

Tennessee state government's adoption, implementation, and alignment with the National Institute of Standards and Technology Artificial Intelligence Risk Management Framework ("NIST AI RMF 1.0") in connection with state AI policies including the STS Roadmap for Generative AI, the Tennessee Enterprise Generative AI Policy, and the November 2025 AI Advisory Council Action Plan. A true and accurate copy of Petitioner's January 22, 2026 request is attached hereto as Exhibit A.

11. The Department's General Counsel, Lucian D. Geise, acknowledged via email on January 29, 2026, the receipt of the request and asked Petitioner to provide proof of Tennessee residency. Petitioner provided the requested proof of residency via email to Mr. Geise. A true and accurate copy of the Department's January 29, 2026 response is attached hereto as Exhibit B.

12. The Department responded to Petitioner via email on February 6, 2026, stating that it had identified responsive records and estimating fees of \$380.00, calculated at \$76.00 per hour for a total of five hours, without providing any itemized breakdown of how the estimate was allocated among specific tasks or record categories, and without addressing Petitioner's request for a fee waiver on public interest grounds. A true and accurate copy of the Department's February 6, 2026 response is attached hereto as Exhibit C.

13. Petitioner submitted via email on February 7, 2026, a detailed reconsideration letter formally appealing the fee estimate and requesting: (a) reconsideration and grant of a fee waiver on public interest grounds; (b) an itemized cost breakdown; (c) verification that the \$76.00/hour rate reflected the lowest practicable hourly wage as required by the OORC Schedule of Reasonable Charges; and (d) an opportunity to review the records in person using Petitioner's own equipment. Petitioner's reconsideration letter cited the applicable Department rules, OORC Best Practices and Guidelines, and the OORC Schedule of Reasonable Charges. A true and

accurate copy of Petitioner's February 7, 2026 reconsideration letter is attached hereto as Exhibit D.

14. As of the filing of this Petition, the Department has not produced the records from the initial January 22, 2026 request, nor has the Department responded to Petitioner's February 7, 2026 reconsideration request. Petitioner sent a follow-up email to the Department on February 23, 2026 noting that more than seven (7) business days had elapsed without a response and requested an update, pursuant to Tenn. Code Ann. § 10-7-503(a)(2)(B). The Department has not responded to that follow-up communication. A true and accurate copy of Petitioner's February 23, 2026 follow-up email is attached hereto as Exhibit E.

15. More than seven (7) business days have elapsed since Petitioner's reconsideration letter was submitted on February 7, 2026, without any substantive response from the Department. Under Tenn. Code Ann. § 10-7-503(a)(2)(B), the failure to respond constitutes a denial of access to the requested records.

CLAIM FOR RELIEF

Violation of the Tennessee Public Records Act, Tenn. Code Ann. §§ 10-7-501 et seq.

16. The TPRA broadly defines "public records" as "all documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings, or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental entity." Tenn. Code Ann. § 10-7-301(6).

17. The records sought by Petitioner, including internal policies, implementation documents, communications, assessments, and correspondence concerning Tennessee's adoption and governance of artificial intelligence systems using taxpayer funds, were made or received in

connection with the transaction of official state government business and constitute public records subject to disclosure under the TPRA.

18. The TPRA establishes a presumption of openness: "All state, county and municipal records shall at all times, during business hours, be open for personal inspection by any citizen of Tennessee." Tenn. Code Ann. § 10-7-503(a)(1). The burden rests on the governmental entity to demonstrate that a specific statutory exemption justifies withholding any record. The Department has identified no such exemption.

19. Tenn. Code Ann. § 10-7-503(a)(2)(B) requires a governmental entity to respond to a public records request promptly and in no case later than seven (7) business days after receipt. More than seven business days have elapsed since Petitioner's January 22, 2026 request for records. Additionally, more than seven (7) business days have elapsed since the Petitioner submitted a reconsideration request on February 7, 2026, and the Department not only has not produced the records as requested, but also has not provided any response to the Petitioner's request. This failure to respond constitutes a denial of access actionable under Tenn. Code Ann. § 10-7-505.

20. The Department's fee estimate of \$380.00 is procedurally deficient because it fails to provide an itemized breakdown allocating costs among specific tasks and record categories, as required by the OORC Schedule of Reasonable Charges (Effective: January 20, 2017) and Department Rule Chapter 0620-03-10. The estimate does not distinguish between time spent gathering records, time spent reviewing records that require no redaction, and time spent reviewing and redacting records for confidential information under Tenn. Code Ann. § 10-7-504.

21. The Department has not verified that the \$76.00/hour rate reflects the “lowest practicable hourly wage” of employees capable of performing this task, as required by the OORC Schedule of Reasonable Charges.

22. Petitioner's original request expressly sought a waiver of all fees on the grounds that disclosure is in the public interest and not primarily for Petitioner's commercial benefit, within the meaning of the OORC Best Practices and Guidelines and Department Rule 0620-03.

23. The records sought concern the transparency and accountability of taxpayer-funded artificial intelligence systems operated by Tennessee state government, including the degree to which those systems align with widely recognized federal risk management standards. This is a matter of broad public concern affecting all Tennessee residents. The Department has never addressed or ruled on Petitioner's fee waiver request.

24. Separately, Tenn. Code Ann. § 10-7-503 provides that citizens may inspect records in person during business hours. Petitioner requested the opportunity to inspect the responsive records in person at the Department's Nashville offices using Petitioner's own equipment, which would substantially reduce or eliminate reproduction and labor costs. The Department has not responded to this request.

25. This request concerns how the Tennessee state government, through the Department of Finance and Administration, Strategic Technology Solutions, and the Tennessee AI Advisory Council, is deploying, governing, and managing risks associated with artificial intelligence systems funded by Tennessee taxpayers. The degree to which these systems align with established federal risk management standards, address algorithmic bias, and maintain accountability is a matter of direct concern to Tennessee citizens. Transparency in this area serves the public interest and promotes accountable government.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Declare that Respondent has willfully violated the Tennessee Public Records Act, Tenn. Code Ann. § 10-7-501 et seq., by unlawfully denying access to non-exempt records;
2. Order Respondent to immediately make available for inspection, copying, and/or electronic transmission of all records responsive to Petitioner's January 22, 2026 public records request without requiring prepayment of any fees pending resolution of Petitioner's fee waiver request;
3. Enjoin Respondent from continuing to engage in the unlawful practices described herein and require Respondent to adopt, implement, and consistently apply written public records policies that are fully compliant with the TPRA;
4. Set this matter for an expedited show-cause hearing pursuant to Tenn. Code Ann. § 10-7-505(b) and enter such interim orders as are necessary to preserve Petitioner's rights and to prevent further delay or potential spoliation, including a litigation hold on responsive records and data;
5. Award Petitioner all reasonable costs involved in obtaining the record(s), including reasonable attorneys' fees, pursuant to Tenn. Code Ann. § 1-7-505(g); and
6. Award any such other and further relief as the Court deems just and proper to enforce compliance with the TPRA and prevent ongoing violations.

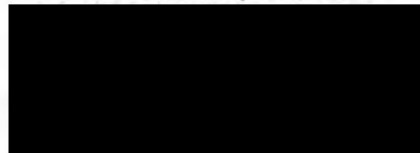
THIS IS PETITIONER'S FIRST REQUEST FOR EQUITABLE RELIEF.

LIST OF EXHIBITS

- Exhibit A:** Petitioner's Public Records Request dated January 22, 2026
- Exhibit B:** Department's Response dated January 29, 2026 (residency request)
- Exhibit C:** Department's Response dated February 6, 2026 (fee estimate)
- Exhibit D:** Petitioner's Reconsideration Letter dated February 7, 2026
- Exhibit E:** Petitioner's Follow-Up Email dated February 23, 2026

Respectfully submitted by,

/s/ Alvin Bonds II
Alvin Bonds II, Pro Se



VERIFICATION

I, Alvin Bonds II, being duly sworn, state that I am the Petitioner in the above-captioned matter; that I have read the foregoing Petition; and that the facts stated therein are true and correct to the best of my knowledge and belief.

Alvin Bonds II
Alvin Bonds II

STATE OF TENNESSEE
COUNTY OF Madison

SWORN to and subscribed before me this 2 day of March, 2026.

[Signature]
Notary Public

My Commission Expires: 6-24-29



My Commission Expires June 24, 2029