

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF ARLINGTON

HEATHER SAWYER,

Petitioner,

v.

The COMMONWEALTH OF VIRGINIA,
111 East Broad St.
Richmond, VA 23219

and

GLENN YOUNGKIN, in his official capacity as
the GOVERNOR of the COMMONWEALTH
OF VIRGINIA,
111 East Broad St.
Richmond, VA 23219

and

VIRGINIA OFFICE OF THE GOVERNOR
111 East Broad St.
Richmond, VA 23219

For All, Serve:

Attorney General of Virginia
202 North Ninth St.
Richmond, VA 23219

Respondents.

CIVIL CASE NO. _____

PETITION FOR INJUNCTIVE AND MANDAMUS RELIEF

1. This is an action brought by Heather Sawyer under the Virginia Freedom of Information Act, Va. Code Ann. § 2.2-3700 *et seq.* (“FOIA”), seeking injunctive and mandamus relief against the Commonwealth of Virginia, the Office of the Governor, and Governor Glenn Youngkin (“Respondents”) for failure to make public records available for inspection in violation of FOIA.

2. Petitioner submitted a series of FOIA requests for records related to the creation and operation of the Governor’s “Tip Line,” helpeducation@governor.virginia.gov, an e-mail address that the Governor established during his first month in office. When it was launched in January, the Governor said the Tip Line was intended to “allow[] parents to send concerns about violations of students’ ‘fundamental rights’ and any other perceived divisive practices” within Virginia schools. See Molly Feser & Dominic Catacora, *Youngkin’s Teacher Tip Line Faces Backlash from Parents and Educators*, WYDaily (Feb. 7, 2022), <https://wydaily.com/news/2022/02/07/youngkins-teacher-tip-line-faces-backlash-from-parents-and-educators/>. The creation of the Tip Line sparked much debate and discussion among parents and public educators.

3. Despite the public purpose of the Tip Line, Respondents have either withheld or denied the existence of a significant number of records responsive to Petitioner’s requests, including, for example, policies and procedures governing the creation and operation of the Tip Line, statistics regarding the Tip Line, and communications between the Governor’s Office and other Virginia agencies or outside groups and individuals about the Tip Line or responding to Tip Line emails, among other things.

4. Respondents have asserted either that the public records sought do not exist or are otherwise exempt from FOIA’s disclosure requirements pursuant to Va. Code Ann. § 2.2.-3705.7(2) (the “Working Papers Exemption”). The Working Papers Exemption, however, does not apply to the records at issue, and Respondents’ claim there exist no records in response to certain of Petitioner’s requests strains credulity and suggests that an adequate search was not conducted. Petitioner therefore asks the Court for injunctive, mandamus, and any such further relief as this Court deems just and proper.

JURISDICTION AND VENUE

5. This Court has personal jurisdiction over this matter pursuant to Va. Code. Ann. § 2.2-3713(A)(3).

6. This Court has subject matter jurisdiction over this matter pursuant to Va. Code Ann. §§ 2.2-3704(A) and 2.2-3713(A)(3).

7. This Court is the proper venue for this matter pursuant to Va. Code Ann. § 2.2-3713(A)(3).

PARTIES

8. Petitioner Heather Sawyer is a citizen of Virginia who resides in Arlington County, Virginia. She is the Executive Director of American Oversight, a nonpartisan non-profit section 501(c)(3) organization primarily engaged in disseminating information to the public. American Oversight is committed to promoting transparency in government, educating the public about government activities, and ensuring the accountability of government officials. Through research and open records requests, American Oversight uses the information it gathers, and its analysis of it, to educate the public about the activities and operations of government through reports, published analyses, press releases, and other media.

9. Respondents are the Commonwealth of Virginia; its Governor, Glenn Youngkin, in his official capacity; and the Virginia Office of the Governor.

LEGAL FRAMEWORK

10. FOIA defines public records as “all writings and recordings . . . however stored, and regardless of physical form or characteristics, prepared or owned by, or in the possession of

a public body or its officers, employees or agents in the transaction of public business.” Va. Code Ann. § 2.2-3701.

11. There is “no question that e-mails fall within the definition of public records” under FOIA. *Beck v. Shelton*, 267 Va. 482, 490 (2004).

12. FOIA requires that “all public records shall be available for inspection and copying upon request” unless release is prohibited by law or the records custodian has properly invoked one of FOIA’s limited exceptions to disclosure. Va. Code Ann. § 2.2-3700(B).

13. FOIA narrowly excludes from mandatory disclosure “[w]orking papers and correspondence of the Office of the Governor.” Va. Code Ann. § 2.2-3705.7(2).

14. FOIA prohibits a public body from “withhold[ing] a public record in its entirety on the grounds that some portion of the public record is excluded from disclosure[.]” Va. Code Ann. § 2.2-3704.01. That is, “only those portions of the public record containing information subject to an exclusion . . . may be withheld, and all portions of the public record that are not so excluded shall be disclosed.” *Id.*

15. FOIA requires that a public body inform a requestor in writing when public records are being withheld and mandates that the public body’s response “identify with reasonable particularity the volume and subject matter of withheld records, and cite, as to each category of withheld records, the specific Code section that authorizes the withholding of the records.” Va. Code Ann. § 2.2-3704(B)(1).

16. Upon receiving a FOIA request, a public body that is the custodian of the requested records has five (5) working days to respond to that request. *See* Va. Code Ann. § 2.2-3704(B).

17. A single instance of denial of the rights and privileges conferred by FOIA is sufficient to invoke the remedies FOIA provides. *See* Va. Code Ann. § 2.2-3713(D).

18. FOIA places the burden of proof on a respondent to “establish an exclusion by a preponderance of the evidence” and provides that “[n]o court shall be required to accord any weight to the determination of a public body as to whether an exclusion applies.” Va. Code Ann. § 2.2-3713(E).

19. FOIA provides that the requester is entitled to recover from a respondent its reasonable costs, including attorney fees, if the petitioner “substantially prevails on the merits of the case, unless special circumstances would make an award unjust.” Va. Code Ann. § 2.2-3713(D).

**SPECIFIC CIRCUMSTANCES OF THE DENIAL OF RIGHTS AND PRIVILEGES
CONFERRED BY VA. CODE ANN. § 2.2-3700 *et seq.***

A. The Creation and Maintenance of the Tip Line

20. On January 15, 2022, Governor Glenn Youngkin signed Executive Order Number One (2022), which he expressed was intended to “end the use of inherently divisive concepts, including Critical Race Theory, and to raise academic standards.” *See Exec. Order Number One*, Gov. of Va. (Jan. 15, 2022), <https://www.governor.virginia.gov/media/governorvirginiagov/governor-of-virginia/pdf/74---eo/74---eo/EO-1---ENDING-THE-USE-OF-INHERENTLY-DIVISIVE-CONCEPTS,-INCLUDING-CRITICAL-RACE-THEORY,-AND-RESTORING-EXCELLEN.pdf>.

21. On January 21, 2022, the Office of the Governor issued a press release referencing an e-mail address, helpeducation@governor.virginia.gov, to which parents could direct “questions or concerns” about Executive Order Number Two (2022), which created “a parental opt-out from mask mandates at both public and private schools in the Commonwealth.”

See Gov. Youngkin Announces Updated Guidelines for Parents, Educators, and PreK-12 School, Gov. of Va. (Jan. 21, 2022), <https://www.governor.virginia.gov/news-releases/2022/january/name-924074-en.html>.

22. On or about January 24, 2022, Governor Glenn Youngkin publicized the same e-mail address, helpeducation@governor.virginia.gov, as a “resource for parents, teachers, and students to relay any questions or concerns” regarding so-called “divisive practices” within Virginia schools. *See Gov. Youngkin sets up email tip line to report ‘divisive’ teaching practices*, NBC12 (Jan. 26, 2022), <https://www.wdbj7.com/2022/01/26/gov-youngkin-sets-up-tip-line-report-divisive-teaching-practices/>; *The John Fredericks Show, Gov. Glenn Youngkin Unplugged on Masks, VA Election Board and Illegals*, Rumble (Jan. 24, 2022), <https://rumble.com/vt7v9p-gov.-glenn-youngkin-unplugged-on-masks-va-election-board-and-illegals.html> (“Fredericks Show”).

23. Governor Youngkin indicated that he intends to use the e-mails to enforce Executive Order Number One. *See Fredericks Show at 00:15:25-00:15:54; see also Margaret Barthel, Va. Gov. Youngkin Sets Up Email ‘Tip line’ To Report Teachers, Schools*, DCIST (Jan. 27, 2022), <https://dcist.com/story/22/01/27/virginia-gov-youngkin-sets-up-email-tip-line-to-report-teachers-schools/> (“Youngkin said his executive order — and parents’ reports to the email inbox — would help the administration’s superintendent of public instruction ‘review and make sure that these kinds of practices aren’t being used in the classroom.’”).

24. Numerous educational organizations have opposed the Tip Line, including the Virginia Association of Colleges and Teacher Educators, Virginia Association of Elementary School Principals, Virginia Association of School Superintendents, Virginia Association for Supervision and Curriculum Development, Virginia Counselors Association, Virginia Education

Association, Virginia Parent Teacher Association, and the Virginia Professors and Educational Leadership.

25. On or about February 4, 2022, Governor Youngkin defended the Tip Line against criticism, asserted that he could not “characterize the communications” sent to the Tip Line, and insisted that the Tip Line made him “a better governor” and gave him “a chance to listen to Virginians.” See Henry Graff, *Gov. Youngkin defends education tip line and moves on critical race theory*, NBC12 (Feb. 4, 2022), <https://www.nbc12.com/2022/02/04/gov-youngkin-defends-education-tip-line-moves-critical-race-theory/>.

26. On or about February 4, 2022, Governor Glenn Youngkin, when asked, did not “provide any specific penalties that may be at his disposal if school districts refuse to comply with his CRT executive order.” See Jackie DeFusco, *Youngkin won’t detail school ‘tip line’ complaints: ‘It gives me a chance to listen’*, ABC8 (Feb. 4, 2022), <https://www.wric.com/news/youngkin-wont-detail-school-tip-line-complaints-defends-dead-bills-in-interview/>. Governor Youngkin asserted, however, that his administration would “make sure” concepts like Critical Race Theory were “not in the curriculum.” *Id.*

27. On January 24, 2022, the same day that Governor Youngkin appeared on the Fredericks Show to promote the Tip Line, Jillian Balow, Elizabeth Schultz, Richard “Dicky” Shanor (all officials within the Virginia Department of Education) and Max Eden (a fellow with the American Enterprise Institute who specializes in education reform) corresponded to set a meeting. (A true and correct copy of this correspondence, obtained from the pleadings in *Associated Press v. Commonwealth of Va.*, No. CL22001489-00 (Richmond Cir. Ct.), is attached hereto as Exhibit 1.) On information and belief, the meeting concerned the Tip Line.

28. Governor Youngkin has directed that e-mails sent to the Tip Line be catalogued.

See Fredericks Show at 00:15:25-00:15:54.

29. E-mails sent to the Tip Line are maintained on servers hosted by Google, *see infra* ¶¶ 43, 47.

30. Because the e-mails sent to the Tip Line reside on a Google platform, Respondents have the ability to give numerous government employees, as well as individuals not employed by the Commonwealth, access to the Tip Line email account.

31. On information and belief, individuals and/or entities falling outside the statutory definition of the “Office of the Governor,” *see* Va. Code Ann. § 2.2-3705.7(2), have worked on issues related to the Tip Line, including the creation and operation of the Tip Line and the review of Tip Line emails. These individuals include, but are not limited to:

- a. Jillian Balow, Virginia Superintendent of Public Instruction; Elizabeth Schultz, Assistant Superintendent of Public Instruction; and Richard “Dicky” Shanor, Chief of Staff to Jillian Balow; and
- b. Max Eden, as well as individuals who may be working with him.

32. On information and belief, some e-mails sent to the Tip Line are also addressed to members of the Virginia Department of Education and its staff, as well as to local school district employees.

33. Upon information and belief, many thousands of e-mails have been sent to the Tip Line.

B. Petitioner’s FOIA Requests to the Office of the Governor

34. On July 29, 2022, Heather Sawyer submitted several FOIA requests to the Office of the Governor which serve as the basis for this Petition.¹

The “Tip Line Email Exchanges Request(s)” (FOIA Requests 754 and 756)

35. The first request, (which Petitioner labeled VA-GOV-22-0754), sought (1) “[a]ll email communications (including emails, email attachments, complete email chains, and calendar invitations) sent by helpeducation@governor.virginia.gov” and (2) “[a]ll email communications (including emails, email attachments, complete email chains, and calendar invitations) sent by any employee of the Governor’s office from their individual email account in response to any message originally sent to the helpeducation@governor.virginia.gov email address.” *See Sawyer Aff.* ¶ 4 & Ex. A (the first “Tip Line Email Exchanges Request” or “Request 754”).

36. The first Tip Line Email Exchanges Request specified that it sought all responsive records “from January 21, 2022, through the date the search is conducted.” *Id.* Ex. A at 1.

37. In response, the Office of the Governor asserted that, “based upon reasonable inquiry within the Governor’s Office, ‘the requested documents could not be found or do not exist.’” *Id.* ¶ 6 & Ex. C; *see also id.* ¶ 7 & Ex. D.

38. Petitioner submitted a second request, (which Petitioner labeled VA-GOV-22-0756), substantively identical to the first Tip Line Email Exchanges Request, which sought all

¹ Another requestor had previously submitted identical requests on March 28, 2022, and May 24, 2022, through American Oversight. *See Sawyer Aff.* ¶¶ 5, 9, 13, 17, 21, 25. American Oversight received the responses to those requests. *See id.* Exs. D, G, J, M, P, S, T, U. After Ms. Sawyer submitted her requests in July, the Office of the Governor confirmed on August 3, 2022, that its responses to Ms. Sawyer’s requests were the same as those provided to the previous requestor. *See id.* ¶¶ 7, 11, 15, 19, 23, 29 & Ex. D.

responsive records “from March 28, 2022, through the date the search is conducted.” *Id.* ¶ 8 & Ex. E (the second “Tip Line Email Exchanges Request” or “Request 756”).

39. In response, the Office again asserted that, “based upon reasonable inquiry within the Governor’s Office, the requested documents could not be found or do not exist.” *Id.* ¶ 10 & Ex. G.

40. In other words, the Office of the Governor has stated in response to Petitioner’s Tip Line Response Requests that—despite the substantial fanfare with which the Governor announced and promoted the Tip Line and despite the Governor’s statement that he intended to use the Tip Line to “enforce” Executive Order No. 1—no one in his Office has sent a single e-mail responding to any tip submitted to the Tip Line.

The “Policies and Procedures Request(s)” (FOIA Requests 755 and 757)

41. Petitioner submitted a request (which she labeled VA-GOV-22-0755) seeking (1) “[r]ecords sufficient to indicate the number of tips that ha[d] been sent to the [Tip Line], the types of tips received if categorized by [the Governor’s] office, and the number of investigations opened based on those tips” and (2) “[a]ny policies or procedures governing or reflecting (a) the creation or operation of the [Tip Line] or (b) the review or investigation of any tips received through the tip line (including, but not limited to, records concerning the documentation or preservation of any received tips, the process for investigating, corroborating, or determining the credibility of received tips, or the process for determining whether a received tip warranted any further review, investigation, or other action).” *See Sawyer Aff.* ¶ 12 & Ex. H at 1 (the first “Policies and Procedures Request” or “Request 755”).

42. The first Policies and Procedures Request specified that it sought all responsive records “created or in effect from January 15, 2022, through the date the search is conducted.”

Id. Ex. H at 1.

43. In response, the Office of the Governor asserted that that “responsive documents are contained in a large gmail account which changes daily” and that “[s]uch documents are being entirely withheld pursuant to” the Working Papers Exemption. *Id.* ¶ 14 & Ex. J.

44. The response did not contain any explanation for why the Working Papers Exemption supposedly applies to permit the withholding of the requested documents in their entirety. *See* Va. Code Ann. § 2.2-3700(B) & § 2.2-3713(E) (burden to justify invocation of exemptions, which are to be “narrowly construed,” rests with respondent agencies); Va. Code Ann. § 2.2-3704.01 (records may not be withheld in full just because some portions are exempt).

45. Nor did the Office of the Governor “identify with reasonable particularity the volume [or] subject matter of withheld records.” Va. Code Ann. § 2.2-3704(B)(1).

46. Petitioner also sent a request she labeled VA-GOV-22-0757, substantively identical to the first Policies and Procedures Request, which sought all responsive records “created or in effect from March 28, 2022, through the date the search is conducted.” *See* Sawyer Aff. ¶ 16 & Ex. K (the second “Policies and Procedures Request” or “Request 757”).

47. The Office of the Governor similarly asserted that that “the documents in question are on a sizeable gmail account which changes daily” and that “[s]uch documents are being entirely withheld pursuant to” the Working Papers Exemption. *See id.* ¶ 18 & Ex. M.

48. Again, the Office of the Governor did not explain its claim of exemption nor identify the volume or subject matter of the withheld records. *See supra* ¶¶ 44, 45.

49. In summary, the Office of the Governor, in response to the Policies and Procedures Requests, has claimed that all policies or procedures concerning the creation and operation of the Tip Line and the investigation of tips are entirely exempt from public disclosure under the Working Papers Exemption. The Office also claims that even records showing aggregate data, such as “the number of tips” received, “the types of tips received,” and “the number of investigations opened” are fully exempt from disclosure. The Office of the Governor failed to explain why this exemption supposedly applies and failed to identify the number and types of documents it was withholding.

The “General Communications Request” (FOIA Request 758)

50. Petitioner submitted a request (which she labeled VA-GOV-22-0758) to the Office of the Governor, seeking (1) “[a]ll communications between or among (a) one or more employees who work within the Virginia Governor’s Office and (b) any group or individual outside the government of Virginia, that are related to the creation or operation of the” Tip Line; (2) “[a]ll documents provided (or made accessible) to any group or individual outside the government of Virginia . . . related to the creation or operation of the Tip Line;” (3) “[a]ll communications between or among (a) one or more employees who work within the Virginia Governor’s Office and (b) an employee or employees of the Commonwealth or its municipalities or subdivisions, who work outside the Office of the Governor, that are related to the creation or operation of the Tip Line;” and (4) “all documents provided (or made accessible) to an employee or employees of the Commonwealth or its municipalities or subdivisions, who work outside the Office of the Governor . . . related to the creation or operation of the Tip Line.” *See Sawyer Aff.* ¶ 20 & Ex. N (the “General Communications Request” or “Request 758”).

51. The Office of the Governor responded by partially granting and partially denying the request. It produced four pages of records and explained that the remainder of the requested records—“approximate[ly] . . . twelve pages”—were being withheld pursuant to the Working Papers Exemption. *Id.* ¶ 22 & Ex. P.

52. The Office of the Governor failed to explain why this exemption supposedly applies to the withheld documents.

The “Specific Communications Request” (FOIA Request 759)

53. Finally, Petitioner submitted a request (which she labeled VA-GOV-22-0759) seeking (1) “[a]ll electronic communications . . . between (a) any [specified] official [identified therein] and (b) [any non-governmental] individuals [and/or] organizations listed [therein]” for the period January 15, 2022, through the date of the search and (2) “[a]ll electronic communications . . . sent by, on behalf of, or at the behest of any of the [listed] individuals . . . containing any of the [listed] key terms” for the same period. *See Sawyer Aff.* ¶ 24 & Ex. Q (the “Specific Communications Request” or “Request 759”).

54. In response to this request, the Office of the Governor produced 144 pages of records. *See id.* ¶ 27 & Ex. U. The Office also indicated it was withholding the remaining approximately 700 pages of records “in their entirety” under the Working Papers exemption. *Id.* ¶ 28 & Ex. U.

CAUSE OF ACTION:
VIOLATION OF THE VIRGINIA FREEDOM OF INFORMATION ACT

55. Petitioner reasserts and adopts by reference paragraphs 1 – 54.

56. All of the records requested by Petitioner are public records under the Virginia FOIA. *See Va. Code Ann.* § 2.2-3701.

57. **The Tip Line Email Exchanges Request and the General Communications**

Request: Respondents violated FOIA with respect to the Tip Line Email Exchanges Request and the General Communications Request by their failure to conduct a reasonable search for responsive records. Respondents' claims that (1) neither e-mails sent from the Tip Line nor e-mails sent from individuals within the Governor's Office in response to messages sent to the Tip Line exist and (2) that only 16 pages of responsive records exist with regard to the General Communications Request are not credible based on known facts, including that:

a. Governor Youngkin has repeatedly defended the Tip Line as a form of constituent services. *See, e.g., supra* ¶¶ 2, 20, 21-23, 25-26, 28.

b. Governor Youngkin, moreover, made the Tip Line an integral part of his very first Executive Order and said that he intended to use it to enforce that order and to "root out" so-called "divisive concepts" like Critical Race Theory from Virginia classrooms. *See, e.g., supra* ¶¶ 2, 20, 21-23, 25-26, 28.

c. In *Associated Press v. Commonwealth of Virginia*, No. CL22001489-00 (Richmond Cir. Ct.), the petitioners publicly filed their own communications with the Commonwealth regarding the Tip Line, specifically their FOIA requests about it. Despite the fact that these records fall squarely within the terms of the Communications Request, they were not produced or otherwise identified in response to that request.

58. **The Policies and Procedures Request, the General Communications Request, and the Specific Communications Request:** Respondents' withholding of (1) records concerning the number of emails sent to the Tip Line, the types of tips received, and any investigation of tips; (2) the policies and procedures concerning the creation/operation of the Tip

Line and the investigation of tips; (3) information shared between employees of the Office of the Governor and individuals outside of that Office also violates FOIA:

a. Because the records requested in the Policies and Procedures Request, the General Communications Request, and the Specific Communications Request are “public records,” Va. Code Ann. § 2.2-3701, they are “presumed open, unless an exemption is properly invoked,” Va. Code Ann. § 2.2-3700(B).

b. Respondents cursorily claimed the Working Papers Exemption, Va. Code § 2.2-3705.7(2), but failed to justify the application of this exemption, *see supra* ¶¶ 44, 45, 48, 55. The Working Papers Exemption does not apply to the requested records and thus they must be disclosed.

c. Respondents’ response also violated FOIA because it failed to “identify with reasonable particularity the volume and subject matter of withheld records.” Va. Code Ann. § 2.2-3704(B)(1).

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests that this Court:

59. Hold a hearing on this matter.

60. Issue an injunction preventing Respondents from continuing to violate FOIA by:

(a) failing to conduct a reasonable search for records in response to the Tip Line Response Requests and therefore failing to provide Petitioner with access to the public records sought in the request;

(b) failing to conduct a reasonable search for records in response to the General Communications Request and therefore failing to provide Petitioner with access to the public records sought in the request;

- (c) failing to identify the volume and subject matter of the public records responsive to the Policies and Procedures Requests;
- (d) withholding public records responsive to the Policies and Procedures Request on the basis of the Working Papers Exemption;
- (e) withholding public records responsive to the General Communications Request on the basis of the Working Papers Exemption; and
- (f) withholding public records responsive to the Specific Communications Request on the basis of the Working Papers Exemption.

See Va. Code Ann. § 2.2-3713(A) (allowing for enforcement of FOIA by petition for injunction).

61. Issue a writ of mandamus ordering Respondents to:

- (a) conduct a reasonable search for records in response to the Tip Line Response Requests and provide Petitioner with access to the public records sought in the request;
- (b) conduct a reasonable search for records in response to the General Communications Request and provide Petitioner with access to the public records sought in the request;
- (c) identify the volume and subject matter of the public records responsive to the Policies and Procedures Requests;
- (d) produce the public records responsive to the Policies and Procedures Request which have been improperly withheld on the basis of the Working Papers Exemption;

(e) produce the public records responsive to the General Communications Request which have been improperly withheld on the basis of the Working Papers Exemption; and

(f) produce the public records responsive to the Specific Communications Request which have been improperly withheld on the basis of the Working Papers Exemption.

See id. (allowing for enforcement of FOIA by petition for mandamus).

62. Order Respondents to pay Petitioner's costs, including attorney fees pursuant to Va. Code Ann. § 2.2-3713(D).

63. And any such further relief as this Court deems just and proper.

Dated: August 8, 2022

Respectfully submitted,

/s/ Alia L. Smith

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