



September 22, 2022

**VIA EMAIL**

Grayson County Sheriff's Office  
304 Davis Street  
PO Box 160  
Independence, VA 24348  
info@graysoncountyva.gov

**Re: Virginia Freedom of Information Act Request**

Dear FOIA Officer:

Pursuant to the Virginia Freedom of Information Act, Va. Code Ann. § 2.2-3700, I, Anisha Hindocha, a resident of Virginia, make the following request for records.

**Requested Records**

I request that the Grayson County Sheriff's Office produce the following records within five working days:

1. Records reflecting the expenses and costs incurred by the Grayson County Sheriff's Office regarding Sheriff Richard Vaughan's trip to Springfield, Missouri on or around August 19-21, 2022.

To the extent your office has aggregated records sufficient to show all relevant expenses and costs, such as spreadsheets, I would accept production of such records as sufficient. To the extent your office does not have an aggregated record of these costs, I request records reflecting those costs, such as receipts, invoices, charge card or credit card statements, and reimbursement requests.

Relevant expenses may include, but are not limited to, hotel or other lodging costs; costs for air travel, rental car, or other transportation companies; costs incurred for government transportation; the cost of meals or refreshments; and per diem payments.

Relevant expenses include costs associated with the travel of Sheriff Vaughan, and of any staff members, family members, or other individuals travelling with him.

2. All email communications (including emails, email attachments, complete email chains, and calendar invitations) and text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal,

Telegram, or Parler) sent or received by Sheriff Vaughan or anyone communicating on his behalf such as a chief of staff, deputy, scheduler, or assistant, regarding Sheriff Vaughan's trip to Springfield, Missouri on or around August 19-21, 2022, or about Mike Lindell's Moment of Truth Summit.

For parts 1 and 2 of this request, please provide all responsive records from August 1, 2022, through September 6, 2022.

3. All email communications (including emails, email attachments, complete email chains, and calendar invitations) sent by Sheriff Vaughan from August 19-21, 2022.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, I have limited part 3 of its request to emails sent by Sheriff Vaughan. To be clear, however, I still request that complete email chains be produced, displaying both sent and received messages. This means, for example, that both Vaughan's response to an email during the trip and the initial received message are responsive to this request and should be produced.

4. All text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) sent or received by Sheriff Vaughan from August 19-21, 2022.

Please notify me of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

### **Guidance Regarding the Search & Processing of Requested Records**

In connection with its request for records, I provide the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. I seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and

transcripts, notes, or minutes of any meetings, telephone conversations or discussions.

- My request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to this request, this request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to me, please do not hesitate to reach out to my representative at the contact information listed below to discuss this request. I welcome an opportunity to discuss this request with you before you undertake your search or incur search or duplication costs. By working together at the outset, we can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email to the address listed below. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to Anisha Hindocha, c/o American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records, please also provide responsive material on a rolling basis.

## **Conclusion**

We share a common mission to promote transparency in government. I look forward to working with your agency on this request. If you do not understand any part of this request, please contact my counsel at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 897-2465

Sincerely,  
*/s/ Anisha Hindocha*  
Anisha Hindocha