



April 12, 2024

**VIA ONLINE PORTAL**

George Mason University  
4400 University Drive  
Fairfax, VA 22030  
Via Online Portal

**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 George Mason University produce the following records within five working days:

1. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Karen Czarnecki, and (b) any of the external entities or individuals listed below, including anyone communicating on their behalf (including, but not limited to, at the listed email addresses and domains).

**External Entities and Individuals:**

- a. Alliance Defending Freedom ([adflegal.org](http://adflegal.org))
- b. American Principles Project ([americanprinciplesproject.org](http://americanprinciplesproject.org))
- c. Americans United for Life ([aul.org](http://aul.org))
- d. Brian Sanderson ([bsanderson@threeoakgroup.com](mailto:bsanderson@threeoakgroup.com))
- e. Center for Renewing America ([americarenewing.com](http://americarenewing.com))
- f. Charlotte Lozier Institute ([lozierinstitute.org](http://lozierinstitute.org))
- g. Citizens for Renewing America ([citizensrenewingamerica.com](http://citizensrenewingamerica.com))
- h. Concerned Women for America ([concernedwomen.org](http://concernedwomen.org), [cwfa.org](http://cwfa.org))
- i. Conservative Partnership Institute ([cpi.org](http://cpi.org), [conservativepartnership.org](http://conservativepartnership.org))
- j. Family Policy Alliance ([familypolicyalliance.com](http://familypolicyalliance.com))
- k. Family Research Council ([frc.org](http://frc.org), [frcaction.org](http://frcaction.org))
- l. Federalist Society ([fedsoc.org](http://fedsoc.org), [fed-soc.org](http://fed-soc.org))
- m. Heritage Foundation ([heritage.org](http://heritage.org), [heritageaction.com](http://heritageaction.com))
- n. Independent Women's Forum ([iwf.org](http://iwf.org))
- o. Ken Cuccinelli ([ktc21968@gmail.com](mailto:ktc21968@gmail.com))
- p. Liberty Consulting ([libertyinc.co](http://libertyinc.co))
- q. National Pro-Life Alliance ([prolifealliance.com](http://prolifealliance.com))

- r. National Right to Life Committee (nrlc.org)
- s. Susan B. Anthony List (sbalist.org, sba-list.org)
- t. Three Oak Group (threeoakgroup.com)
- u. U.S. House of Representatives (mail.house.gov)
- v. U.S. Senate (senate.gov)
- w. Virginia House of Delegates (house.virginia.gov)
- x. Virginia State Senate (senate.virginia.gov)
- y. Virginia “Ginni” Thomas
- z. Virginia Attorney General’s Office (oag.virginia.va.us)
- aa. Virginia Governor’s Office (governor.virginia.gov)
- bb. Virginia Institute of Public Policy (virginiainstitute.org)

For part 1 of this request, please note that I do not seek, and that this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. In other words, for example, if Karen Czarnecki received a mass-distribution news clip email from the Charlotte Lozier Institute, that initial email would not be responsive to this request. However, if Karen Czarnecki responded to that email with her own commentary, that subsequent message would be responsive to this request and should be produced.

2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by Karen Czarnecki and containing any of the key terms listed below.

Key Terms:

- i. Dobbs
- ii. Roe
- iii. Clarence
- iv. Ginni
- v. Groundswell
- vi. heartbeat
- vii. Leo
- viii. Lozier
- ix. “pro-life”
- x. prolife
- xi. “Third Century Group”
- xii. unborn

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, I have limited part 2 of this request to emails sent by Karen Czarnecki. To be clear, however, I still request that complete email chains be produced, displaying both sent and received messages. This means that both Ms. Czarnecki’s response to an email and the initial received message are responsive to this request and should be produced.

**For both parts of this request, please provide all responsive records from January 1, 2022, through March 11, 2024.**

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 my 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.
- 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. 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. 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 Elizabeth Haddix at [records@americanoversight.org](mailto:records@americanoversight.org) or (252) 359-7424 ext. 1031.

Sincerely,

*/s/ Anisha Hindocha*  
Anisha Hindocha