

April 23, 2024

VIA EMAIL

City of Roanoke
FOIA Officer
Robin Viohl
215 Church Avenue
Roanoke, VA 24011
Robin.viohl@roanokeva.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 your office produce the following records within five working days:

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

City of Roanoke Officials:

- a. Electoral Board Chair Charles Shell
- b. Electoral Board Vice Chair Al Bedrosian

External Entities or Individuals:

1. Ann Grigorian, and/or anyone communicating on behalf of the Virginia Election Integrity Working Group
2. Catherine Engelbrecht (catherine@truethevote.org), and/or anyone communicating on behalf of True the Vote (truethevote.org)
3. Catherine Trauernicht
4. Charles Bernardin
5. Clara Belle Wheeler
6. Cleta Mitchell (cleta@cletamitchell.com, cmitchell@foley.com), Melody Clarke and/or anyone communicating on behalf of the Election Integrity Network (whoscounting.us, electionintegrity.network)
7. Conservative Partnership Institute (cpi.org, conservativepartnership.org)
8. Douglas Frank (drdouglasgfrank@outlook.com, drdouglasgfrank@protonmail.com)

9. Gina Swoboda (ginaswoboda@hotmail.com) and/or anyone communicating on behalf of Voter Reference Foundation (@voterreferencefoundation.com, @voterref.com)
10. Honest Elections Project (honestelections.org)
11. Ian Camacho (ian.c.camacho@gmail.com) and/or anyone communicating on behalf of Look Ahead America (lookaheadamerica.org)
12. Laurie Moore (moore.laurie@gmail.com)
13. Leadership Institute (leadershipinstitute.org)
14. Linda Rantz (cause.america.mo@pm.me), and/or anyone communicating from an email address ending in @causeofamerica.org
15. Mac Warner (amwarner@aol.com)
16. Middle Resolution Policy Foundation (middlesolutionpolicy.org)
17. Mike Lindell, anyone communicating on his behalf, and/or anyone communicating from an email address ending in @mypillow.com or @frankspeech.com
18. Patrick Byrne (deepcapture.com), and/or anyone else communicating on behalf of America Project (americaproject.com)
19. Public Interest Legal Foundation (publicinterestlegal.org, electionlawcenter.com)
20. Republican Party of Virginia (virginia.gop)
21. Rick Richards (drd@cathaid.com, drd@EagleAI.pro, drdronline@me.com), John Richards (johnrichards@EagleAI.pro), and/or anyone communicating on behalf of EagleAI NETwork (eagleai.pro)
22. Scott Pio
23. Thomas More Society (thomasmoresociety.org)
24. Tom Fitton (tfittton@judicialwatch.org), and/or anyone communicating on behalf of Judicial Watch (judicialwatch.org)
25. UnAuthorized (unauthorized.one)
26. Virginia Fair Elections (vafairelections.org)
27. Virginia Institute of Public Policy (virginiainstitute.org)
28. Virginians for America First (virginiansforamericafirst.com)

Please note that I do not seek, and that part one of 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 an official received a mass-distribution news clip email from Virginia Fair Elections, that initial email would not be responsive to this request. However, if the official responded to that email or forwarded it to another individual with the official's own commentary, that subsequent message would be responsive to this request and should be produced.

2. All email communications (including any email messages and attachments thereto) sent by any of the City of Roanoke officials listed above in part one of this request and containing any of the following key terms, listed below.

Key Terms:

- I. "election integrity"
- II. "voter fraud"
- III. "election fraud"
- IV. "hand count"
- V. Trump
- VI. "list maintenance"
- VII. "election certification"
- VIII. "certify results"
- IX. "certify the election"
- X. "certify election"
- XI. "forensic audit"
- XII. elector

In an effort to accommodate your office and reduce the number of potentially responsive records to be produced, I have limited part two of this request to emails sent by the listed official. To be clear, however, I still request that complete email chains be produced, displaying both sent and received messages. This means that if a listed official sent an email responding to an incoming message, both the official's response and the initial message are responsive to this request and should be produced.

For both parts of this request, please provide all responsive records from January 1, 2024, through the date the search is conducted.

Please notify my authorized representative at American Oversight 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:

- 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 authorized legal 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 my legal representative, Elizabeth Haddix, at records@americanoversight.org or (252) 359-7424 ext. 1031.

Sincerely,

/s/ Anisha Hindocha
Anisha Hindocha
4307 Gaines Rd.
Richmond VA 23222