



January 15, 2025

VIA EMAIL

Reynolds Community College
P. O. Box 85622
Richmond, VA 23285
FOIA@reynolds.edu

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, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Dr. Scott E. Daniels, Adjunct Faculty in the School of Humanities and Social Sciences, and (b) the external entities and individuals listed below (including, but not limited to, anyone communicating from an email address ending in the listed domains).

External Entities and Individuals:

- a. Alliance Defending Freedom (adflegal.org)
- b. American College of Pediatricians (acpeds.org)
- c. American Principles Project (americanprinciplesproject.org)
- d. Americans United for Life (aul.org)
- e. Charlotte Lozier Institute (lozierinstitute.org)
- f. Concerned Women for America (concernedwomen.org or cwfa.org)
- g. David Reardon
- h. Elliot Institute (elliottinstitute@gmail.com)
- i. Ethics and Public Policy Center (eppc.org)
- j. Family Policy Alliance (familypolicyalliance.com)
- k. Family Research Council (frc.org or frcaction.org)
- l. Independent Women's Forum (iwf.org)
- m. James Studnicki (jstudnic11@gmail.com)
- n. National Right to Life Committee (nrlc.org)
- o. Students for Life of America (studentsforlife.org or studentsforlifeaction.org)
- p. Susan B. Anthony Pro-Life America (sbaproforlife.org)

Please note that I do not seek, and that part 1 of this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails are responsive to this request. For example, if Dr. Daniels received a mass-distribution news clip email from a listed external entity or individual, that initial email would not be responsive to this request. However, if he forwarded that email with his 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 Dr. Scott E. Daniels, Adjunct Faculty in the School of Humanities and Social Sciences, and containing any of the key terms listed below.

Key Terms:

- a. "AHM"
- b. "Alliance for Hippocratic Medicine"
- c. "pro choice"
- d. "pro life"
- e. "pro-choice"
- f. "Pro-choice"
- g. "pro-life"
- h. "SBA List"
- i. Dannenfelser
- j. Kacsmayk
- k. Lozier
- l. Prolife
- m. 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 its request to emails sent by Dr. Daniels. To be clear, however, I still request that complete email chains be produced, displaying both sent and received messages. For example, both Dr. Daniels' response to an email containing a listed key term 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 June 1, 2023, through the date the search is conducted.

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:

- 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. 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 Jess Myers at records@americanoversight.org or (202) 897-3914.

Sincerely,

/s/ Anisha Hindocha
Anisha Hindocha