

Record No. 0414-23-4

IN THE COURT OF APPEALS OF VIRGINIA

CITIZENS FOR FAUQUIER COUNTY,
Appellant,

v.

**TOWN OF WARRENTON, VIRGINIA and STEPHEN CLOUGH, Town
Clerk to the TOWN OF WARRENTON, VIRGINIA, in his official capacity,**
Appellees.

**BRIEF OF AMICI CURIAE THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS AND 22 MEDIA AND TRANSPARENCY
ORGANIZATIONS IN SUPPORT OF APPELLANT**

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INTRODUCTION AND STATEMENT OF INTEREST

Amici curiae the Reporters Committee for Freedom of the Press (the “Reporters Committee”) and 22 media and transparency organizations submit this brief in support of Appellant Citizens for Fauquier County. Citizens for Fauquier County consents to the filing of this brief. Appellees the Town of Warrenton, Virginia and Stephen Clough, Town Clerk to the Town of Warrenton, Virginia, in his official capacity, consent to the filing of this brief.

The Reporters Committee was founded by leading journalists and media lawyers in 1970 when the nation’s news media faced an unprecedented wave of government subpoenas forcing reporters to name confidential sources. Additional amici are news media organizations, publishers, and groups dedicated to protecting the freedom of information interests of the press and the public.¹

¹ Amici are the Reporters Committee for Freedom of the Press, Piedmont Journalism Foundation, Axios Media Inc., Fauquier Times, Freedom of the Press Foundation, Gannett Co., Inc., The Media Institute, National Freedom of Information Coalition, National Newspaper Association, National Press Club Journalism Institute, The National Press Club, National Press Photographers Association, The News Leaders Association, News/Media Alliance, Nexstar Media Inc., Online News Association, Prince William Times, Society of Environmental Journalists, Society of Professional Journalists, TEGNA Inc., Tribune Publishing Company, Tully Center for Free

Amici write to emphasize the importance of press and public access to records concerning land use in Virginia's communities under the Virginia Freedom of Information Act, Va. Code Ann. §§ 2.2-3700 *et seq.* ("FOIA" or the "Act"). Access to such records makes it possible for journalists and news organizations to report on matters of significant public concern and, accordingly, enables public oversight of government agencies and officials.

Amici frequently rely on public records, including those obtained pursuant to FOIA, to report on municipal government and to shed light on the conduct of local officials. Members of the news media, including amici, play a key role in fulfilling FOIA's promise of "increas[ing] awareness by all persons of governmental activities and afford[ing] every opportunity to citizens to witness the operations of government." Va. Code Ann. § 2.2-3700(B). As such, amici have a strong interest in this case.

This Court should reverse the decision below that incorrectly determined that the Town of Warrenton (the "Town") may withhold in excess of 3,000 records related to the special use permit sought by

Speech, and Virginia Press Association. Descriptions of amici are included herein as Appendix A.

Amazon Data Services, Inc. (“Amazon”) to erect a 220,000 square foot data center within the Town. *See* Decision, No. CL22-551 (Fauquier Cnty. Cir. Ct. Feb. 15, 2023). The Court’s interpretation of the Town’s asserted exemption, Va. Code Ann. § 2.2-3705.7(2) (hereinafter, the “Working Papers Exemption”), is in direct conflict with FOIA’s command to narrowly construe any exemptions to disclosure, Va. Code Ann. § 2.2-3700(B), and interferes with the ability of journalists to cover issues squarely of public concern, such as the interaction between local government and private corporations.

Access to the records like those at issue in this case enables members of the news media to analyze and report on issues critical to Virginia’s communities, while concomitantly providing oversight and fostering accountability over institutions tasked with serving the public. Accordingly, for the reasons herein, amici urge this Court to reverse the decision of the court below and rule in favor of disclosure.

ARGUMENT

Members of the news media play a key role in facilitating trust in institutions by promoting transparency. *See, e.g., Globe Newspaper Co. v. Superior Court*, 457 U.S. 596 (1982). Indeed, “[t]he Constitution specifically selected the press . . . to play an important

role in the discussion of public affairs.” *Mills v. Alabama*, 384 U.S. 214, 219 (1966). To ensure that the General Assembly’s directive that FOIA “‘be liberally construed’ to promote public access to government activities and operations” endures, *Cole v. Smyth Cnty. Bd. of Supervisors*, 298 Va. 625, 636, 842 S.E.2d 389, 394 (2020), it is critically important to narrowly construe the Working Papers Exemption to maximize access to public records.

I. Narrow construction of FOIA’s exemptions—including the Working Papers Exemption—is a cornerstone of the Act.

Broad disclosure of public records and the narrow construction of any exemptions are cornerstones of freedom of information laws, including Virginia’s. *See* Va. Code Ann. § 2.2-3700(B) (stating that the Act is to be “liberally construed to promote an increased awareness by all persons of governmental activities” and its exemptions are to “be narrowly construed”). The Working Papers Exemption excepts from mandatory disclosure “[w]orking papers and correspondence of” certain executives. Va. Code Ann. § 2.2-3705.7(2).² The exemption was designed to shield from disclosure

² The Act, and the Working Papers Exemption, specifically, has been through several revisions and recodifications. Prior to 2004, identical statutory language was found at Va. Code Ann. § 2.2-3705(6); the exemptions in that section were recodified as §§ 2.2-

only records of these specified executives that are personal (*i.e.*, closely held) and deliberative (*i.e.*, that precede an executive decision). *See id.*³ The circuit court failed to properly apply the Working Papers Exemption in two ways. First, it did not place the necessary evidentiary burden on Appellees. Second, the court failed to narrowly construe the Working Papers Exemption.

Amici agree with Appellant’s contention that Appellees did not make the necessary evidentiary showing to carry their burden, and thereby allow the circuit court to find that Appellees were permitted to withhold the instant records pursuant to the Working Papers Exemption. *See Va. Code Ann. § 2.2-3713(E)* (“In any action to

3705.1–3705.8. *See Acts 2004, c. 690.* Prior to 2001, the entire FOIA was located under a different title of the Virginia Code. *Va. Code Ann. §§ 2.1-340 (2000) et seq.; see Acts 2001, c. 844* (recodifying Title 2.1). Under that title, a previous version of the Working Papers Exemption, codified at section 2.1-342, contained slightly different—and arguably broader—statutory language. Specifically, from at least 1983 until 1999, the Act exempted “[m]emoranda, working papers and correspondence held or requested by . . . the office of the Governor.” *Va. Code Ann. § 2.1-342(B)(4) (1998)*. A statutory definition of “working papers” also was added to FOIA in 1999. *Id.*

³ These criteria are explicit in the post-1999 statutory definition of “working papers.” *Va. Code Ann. § 2.2-3705.7* (“Working papers’ means those records prepared by or for a public official identified in this subdivision for his personal or deliberative use.”). And it is well-supported by the legislative context of FOIA as to “correspondence.”

enforce the provisions of this chapter, the public body shall bear the burden of proof to establish an exclusion by a preponderance of the evidence.”). Indeed, without the required evidentiary showing, the circuit court could not have determined that key limiting principles of the exemption were met.

For instance, without an evidentiary showing, the circuit court could not have determined whether the withheld records were predecisional and deliberative. *See* Freedom of Information Advisory Council Op. AO-12-00 (Dec. 12, 2000), <https://perma.cc/Y5B2-SWFH> (“the [record] in question lost its working papers status when the [government body] decided to proceed with the [executive action]”).⁴ Nor could the court have determined that the withheld records had not been disseminated in such a way that they lost their personal and deliberative nature. *See id.* (“Merely because [an official] sent the document to the [executive] and it passed through his hands would not be enough to invoke the protection of the working papers exemption.”); Freedom of Information Advisory Council Op.

⁴ Advisory opinions of the Virginia Attorney General and FOIA Counsel may be viewed as persuasive authority. *See, e.g., Fitzgerald v. Loudoun Cnty. Sheriff’s Off.*, 289 Va. 499, 504–05 & n.2, 771 S.E.2d 858, 860–61 (2015).

AO-01-16 (July 11, 2016), <https://perma.cc/6Z7L-CYRC> (“[E]ven if the [record] was originally a working paper prepared for the [executive’s] personal or deliberative use, it has subsequently been disseminated beyond that original personal or deliberative use and therefore is no longer excluded from mandatory disclosure as a working paper.”); *see also* Freedom of Information Advisory Council Op. AO-08-00 (Nov. 8, 2000), <https://perma.cc/QVW2-A53G> (“[O]nce the chief executive disseminates any records held by him, those records lose the exemption authorized by subdivision[.]”). The statute requires that circuit courts strictly insist that the public body demonstrate these fact issues by a preponderance of evidence. Va. Code Ann. § 2.2-3713(E).

In addition to failing to require Appellees to meet their evidentiary burden, the circuit court failed to narrowly construe the Working Papers Exemption. The Act dictates that its disclosure requirements be broadly construed. *See* Va. Code Ann. § 2.2-3700(B) (stating that the Act is to be “liberally construed to promote an increased awareness by all persons of governmental activities” and its exemptions are to “be narrowly construed”). Virginia’s FOIA, like other FOIA statutes, is thus more effectively applied when exemptions

are narrowly construed. The courts of this Commonwealth look to federal and other states' public records laws for guidance in interpreting the Act. *Hawkins v. Town of S. Hill*, 878 S.E.2d 408, 414 (Va. 2022). And, a review of federal and state FOIA laws shows that liberally construing public records laws' disclosure provisions and narrowly construing any exemptions thereto are at the heart of the access landscape at the federal and state levels.

For example, narrow construction of exemptions to the federal Freedom of Information Act, 5 U.S.C. § 552 (“federal FOIA”)—which courts in this state have looked to as instructive when deciding Open Records Act cases, *see, e.g., Hawkins*, 878 S.E.2d at 414—has been a fixture since its passage in 1966. *See, e.g., Dep’t of Justice v. Tax Analysts*, 492 U.S. 136, 151 (1989) (explaining that the federal FOIA’s exemptions “have been consistently given a narrow compass”). This is because the federal FOIA’s ability to facilitate the public’s right to know is a “structural necessity in a real democracy,” *Nat’l Archives & Recs. Admin. v. Favish*, 541 U.S. 157, 172 (2004), and narrow construction of that statute’s exemptions comports “with the Act’s goal of broad disclosure,” *Dep’t of Interior v. Klamath Water Users Protective Ass’n*, 532 U.S. 1, 8 (2001) (quoting *Tax*

Analysts, 492 U.S. at 151). Such is the case with Virginia’s FOIA, as well. *See, e.g., Fitzgerald*, 289 Va. at 505, 771 S.E.2d at 861 (“By its own terms, the statute puts the interpretative thumb on the scale in favor of disclosure: ‘The provisions of [FOIA] shall be liberally construed’ Disclosure exemptions must be ‘narrowly construed’ in favor of disclosure.” (citations omitted)).

Other state courts across the country also broadly interpret the disclosure provisions of their state’s open records laws and narrowly construe exemptions; indeed, some state freedom of information laws explicitly require such a construction. *See, e.g., Chambers v. Birmingham News Co.*, 552 So. 2d 854, 857 (Ala. 1989) (Alabama Open Records Act); *Fuller v. City of Homer*, 75 P.3d 1059, 1062 (Alaska 2003) (Alaska Public Records Act); *Byrne v. Eagle*, 319 Ark. 587, 589 (1995) (Arkansas Freedom of Information Act); *Sierra Club v. Superior Court*, 57 Cal. 4th 157, 166 (2013) (California Public Records Act); *Wilson v. Freedom of Info. Comm’n*, 181 Conn. 324, 329 (1980) (Connecticut Freedom of Information Act); *Newspapers, Inc. v. Metro. Police Dep’t*, 546 A.2d 990, 993 (D.C. 1988) (District of Columbia Freedom of Information Act); *City of Riviera Beach v. Barfield*, 642 So. 2d 1135, 1136 (Fla. Dist. Ct. App. 1994) (Florida

Public Records Act); Ga. Code Ann. § 50-18-70(a) (Georgia Open Records Act); *Ward v. Portneuf Med. Ctr., Inc.*, 150 Idaho 501, 505 (2011) (Idaho Public Records Act); *Times Picayune Publ'g Corp. v. Bd. of Supervisors of La. State Univ.*, 845 So. 2d 599, 605 (La. App. 1 Cir. 5/9/03) (Louisiana Public Records Act); *Swickard v. Wayne Cnty. Med. Exam'r*, 438 Mich. 536, 544 (1991) (Michigan Freedom of Information Act); Mo. Ann. Stat. § 610.011 (Missouri Sunshine Law); Nev. Rev. Stat. Ann. § 239.001(3) (Nevada Public Records Act); *Cap. Newspapers v. Whalen*, 69 N.Y.2d 246, 252 (1987) (New York Freedom of Information Law); *Office of Governor v. Davis*, 122 A.3d 1185, 1191 (Pa. Commw. Ct. 2015) (Pennsylvania Right to Know Law); *Simmons v. Kuzmich*, 166 S.W.3d 342, 346 (Tex. App. 2005) (Texas Public Information Act); *Progressive Animal Welfare Soc'y v. Univ. of Wash.*, 125 Wash. 2d 243, 251 (1994) (Washington Public Records Act).

It is crucial that Virginia courts construe the specific exemption claimed here—the Working Papers Exemption—narrowly. As this case demonstrates, Virginia Code § 2.2-3705.7(2) must be appropriately limited as “[t]he affairs of government are not intended to be conducted in an atmosphere of secrecy[,] since at all times the

public is to be the beneficiary of any action taken at any level of government.” *Am. Tradition Inst. v. Rector & Visitors of Univ. of Va.*, 287 Va. 330, 339, 756 S.E.2d 435, 440 (2014) (quoting Va. Code Ann. § 2.2-3700(B)).

II. News media rely on access to municipal government records in order to perform important journalism for the public’s benefit.

This State’s strong public policy favoring release of records by government agencies for the benefit of the public is clear: It has been recognized by the courts, *see, e.g., White Dog Publ’g, Inc. v. Culpeper Cnty. Bd. of Supervisors*, 272 Va. 377, 634 S.E.2d 334 (2006) (ruling in favor of newspapers seeking to learn more about local government body’s decision to construct a new school in Culpeper County, and awarding them attorneys’ fees), and members of the news media, like amici, know first-hand the concrete public benefits afforded by disclosure of communications among and between government officials and private corporations bearing on land use and local communities.

Take, for instance, reporting published by ecoRI News, an outlet dedicated to reporting on environmental and social justice issues in southern New England. Residents of North Smithfield,

Rhode Island were concerned by the activities of Material Corporation, the operator of a local quarry, in potential disregard of the public's well-being, amidst a backdrop of "constant rumbling of heavy machinery[and] the silica dust left blowing in the wind," which is a Group 1 carcinogen. Frank Carini, *Frustrated Neighbors Claim North Smithfield Quarry Allowed to Disregard Rules*, ecoRI News (Dec. 16, 2022), <https://ecori.org/frustrated-neighbors-claim-north-smithfield-quarry-allowed-to-disregard-rules/>. Concerned about the extent to which the town was or was not enforcing regulations governing businesses conducting earth removal, community members filed Access to Public Records Act ("APRA") requests related to the town and Material Corporation's 89-acre facility. *See id.*

Those requests led to the discovery that many of the documents the town should have on file did not exist or were missing, such as annual quarry inspections and road permits. Indeed, the town's responses to the APRA requests indicated that the business has been operating without the required permits for nearly a decade. The local government's failure to regulate quarry operations proved to be a critical lapse as prolonged exposure to crystalline silica can lead to the lung disease silicosis and to other lung ailments, including lung

cancer. *See id.* As this example underscores, the ability of the press and the public to access public records pertaining to local government regulation of land use businesses operating within its jurisdiction—particularly where negative impact to human health or to the environment is concerned—is paramount.

Specifically with respect to the establishment of large data centers, there is a strong public interest in accessing records that may shed light on local governments' consideration of the environmental effects generated therefrom. For instance, the Seattle Times reported on Google's plans to build more data centers in The Dalles, an Oregon city. Data centers such as the one Google planned to construct require substantial water resources to cool the facility, and local residents feared droughts and resulting inequitable water allocation among people, farms, and fruit orchards. Andrew Selsky, *Oregon city drops fight to keep Google water use private*, Seattle Times (Dec. 15, 2022), <https://www.seattletimes.com/business/oregon-city-drops-fight-to-keep-google-water-use-private/>. Once the data center was constructed, local news media like The Oregonian sought public records from The Dalles to confirm water usage details at Google's data center. *See* Mike Rogoway, *Google's water use is soaring in The*

Dalles, records show, with two more data centers to come, The Oregonian (Dec. 17, 2022), <https://www.oregonlive.com/silicon-forest/2022/12/googles-water-use-is-soaring-in-the-dalles-records-show-with-two-more-data-centers-to-come.html>. The city and Google resisted releasing the data, but following litigation, ultimately agreed to comply with the publication’s requests. *See id.* The water usage data showed that Google’s data centers in The Dalles “used enough water in 2021 to cover the city’s entire 7 square miles (18 square kilometers) 3 inches (7.6 centimeters) deep.” Selsky, *supra*.

And public records about the establishment of data centers stand to shed light about not only water usage, but excessive noise—an often unwelcome accompaniment to such facilities that can not only “disturb sleep, but cause stress, cardiovascular problems and blood disorders.” Christopher Connell, *Why are data centers so noisy? Loose rules, pricey solutions, critics say*, Prince William Times (Nov. 17, 2022), https://www.princewilliamtimes.com/news/why-are-data-centers-so-noisy-loose-rules-pricey-solutions-critics-say/article_18113e2e-66b5-11ed-9e82-f3debf6366c2.html.

The records sought by Appellant, here, will provide needed context surrounding the amendment of the Town of Warrenton’s

zoning laws to permit the construction of data centers and the Warrenton Town Council’s decision to approve the installment of an Amazon data center—information to which the press and the public have both a right and a compelling interest.

CONCLUSION

For the foregoing reasons, the Court should reverse the decision of the court below and rule in favor of disclosure.

Dated: September 7, 2023

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APPENDIX A: DESCRIPTION OF AMICI CURIAE

The Reporters Committee for Freedom of the Press was founded by leading journalists and media lawyers in 1970 when the nation's news media faced an unprecedented wave of government subpoenas forcing reporters to name confidential sources. Today it provides pro bono legal representation, amicus curiae support, and other legal resources to protect First Amendment freedoms and the newsgathering rights of journalists.

Piedmont Journalism Foundation is a nonprofit news organization helping to foster an informed and engaged citizenry in Fauquier County and neighboring areas. It hires reporters to provide in-depth, nonpartisan, explanatory stories on local issues to short-handed local news outlets.

Axios Media Inc. is a digital media company with a mission to deliver news in an efficient format that helps professionals get smarter faster across an array of topics, including politics, science, business, health, tech, media, and local news.

The Fauquier Times is a weekly print newspaper with daily digital offerings. It has a paid general circulation of 4,000 and is the

only print newspaper in the county. It is now owned and financially supported by Piedmont Journalism Foundation.

Freedom of the Press Foundation (FPF) is a non-profit organization that supports and defends public-interest journalism in the 21st century. FPF works to preserve and strengthen First and Fourth Amendment rights guaranteed to the press through a variety of avenues, including building privacy-preserving technology, promoting the use of digital security tools, and engaging in public and legal advocacy.

Gannett is the largest local newspaper company in the United States. Our 260 local daily brands in 46 states—together with the iconic USA TODAY—reach an estimated digital audience of 140 million each month.

The Media Institute is a nonprofit foundation specializing in communications policy issues founded in 1979. The Media Institute exists to foster three goals: freedom of speech, a competitive media and communications industry, and excellence in journalism. Its program agenda encompasses all sectors of the media, from print and broadcast outlets to cable, satellite, and online services.

The National Freedom of Information Coalition is a national nonprofit, nonpartisan organization of state and regional affiliates representing 45 states and the District of Columbia. Through its programs and services and national member network, NFOIC promotes press freedom, litigation and legislative and administrative reforms that ensure open, transparent and accessible state and local governments and public institutions.

National Newspaper Association is a 2,000 member organization of community newspapers founded in 1885. Its members include weekly and small daily newspapers across the United States. It is based in Pensacola, FL.

The National Press Club Journalism Institute is the non-profit affiliate of the National Press Club, founded to advance journalistic excellence for a transparent society. A free and independent press is the cornerstone of public life, empowering engaged citizens to shape democracy. The Institute promotes and defends press freedom worldwide, while training journalists in best practices, professional standards and ethical conduct to foster credibility and integrity.

The National Press Club is the world's leading professional organization for journalists. Founded in 1908, the Club has 3,100 members representing most major news organizations. The Club defends a free press worldwide. Each year, the Club holds over 2,000 events, including news conferences, luncheons and panels, and more than 250,000 guests come through its doors.

The National Press Photographers Association (“NPPA”) is a 501(c)(6) non-profit organization dedicated to the advancement of visual journalism in its creation, editing and distribution. NPPA's members include television and still photographers, editors, students and representatives of businesses that serve the visual journalism industry. Since its founding in 1946, the NPPA has vigorously promoted the constitutional rights of journalists as well as freedom of the press in all its forms, especially as it relates to visual journalism. The submission of this brief was duly authorized by Mickey H. Osterreicher, its General Counsel.

The News Leaders Association was formed via the merger of the American Society of News Editors and the Associated Press Media Editors in September 2019. It aims to foster and develop the highest standards of trustworthy, truth-seeking journalism; to advocate

for open, honest and transparent government; to fight for free speech and an independent press; and to nurture the next generation of news leaders committed to spreading knowledge that informs democracy.

The News/Media Alliance represents news and media publishers, including nearly 2,000 diverse news and magazine publishers in the United States—from the largest news publishers and international outlets to hyperlocal news sources, from digital-only and digital-first to print news. Alliance members account for nearly 90% of the daily newspaper’s circulation in the United States. Since 2022, the Alliance is also the industry association for magazine media. It represents the interests of close to 100 magazine media companies with more than 500 individual magazine brands, on topics that include news, culture, sports, lifestyle and virtually every other interest, avocation or pastime enjoyed by Americans. The Alliance diligently advocates for news organizations and magazine publishers on issues that affect them today.

Nexstar Media Inc. (“Nexstar”) is a leading diversified media company that leverages localism to bring new services and value to consumers and advertisers through its traditional media, digital and mobile media platforms. Nexstar owns, operates, programs or

provides sales and other services to 199 television stations and related digital multicast signals reaching 116 markets or approximately 62% of all U.S. television households.

The Online News Association is the world's largest association of digital journalists. ONA's mission is to inspire innovation and excellence among journalists to better serve the public. Membership includes journalists, technologists, executives, academics and students who produce news for and support digital delivery systems. ONA also hosts the annual Online News Association conference and administers the Online Journalism Awards.

The Prince William Times is a weekly newspaper with daily digital feeds. It has a distribution of 12,000 and is now owned and financially supported by Piedmont Journalism Foundation.

The Society of Environmental Journalists is the only North-American membership association of professional journalists dedicated to more and better coverage of environment-related issues.

Society of Professional Journalists ("SPJ") is dedicated to improving and protecting journalism. It is the nation's largest and most broad-based journalism organization, dedicated to encouraging the free practice of journalism and stimulating high standards of

ethical behavior. Founded in 1909 as Sigma Delta Chi, SPJ promotes the free flow of information vital to a well-informed citizenry, works to inspire and educate the next generation of journalists and protects First Amendment guarantees of freedom of speech and press.

TEGNA Inc. owns or services (through shared service agreements or other similar agreements) 64 television stations in 52 markets.

Tribune Publishing Company is one of the country's leading media companies. The company's daily newspapers include the Chicago Tribune, New York Daily News, The Baltimore Sun, Sun Sentinel (South Florida), Orlando Sentinel, Hartford Courant, The Morning Call, the Virginian Pilot and Daily Press. Popular news and information websites, including www.chicagotribune.com, complement Tribune Publishing's publishing properties and extend the company's nationwide audience.

The Tully Center for Free Speech began in Fall, 2006, at Syracuse University's S.I. Newhouse School of Public Communications, one of the nation's premier schools of mass communications.

The mission of the **Virginia Press Association** is to support our membership through responsive services and resources. We champion the common interests of Virginia newspapers and the ideals of a free press in a democratic society. Since 1881, the Virginia Press Association has been an unwavering advocate for newspapers in the Commonwealth.

CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that a copy of the foregoing BRIEF OF AMICI CURIAE THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS AND 22 MEDIA AND TRANSPARENCY ORGANIZATIONS was e-mailed on this 7th day of September, 2023, to the following:

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I further certify that this brief complies with Rule 5A:19(a)
because the applicable portion contains 3191 words.

By: /s/ Lin Weeks
Lin Weeks (VBN 97351)
REPORTERS COMMITTEE
FOR FREEDOM OF THE
PRESS