

**PETITION FOR INJUNCTION OR MANDAMUS
- FREEDOM OF INFORMATION ACT AND AFFIDAVIT FOR GOOD CAUSE
OR PROTECTION OF SOCIAL SECURITY NUMBERS ACT**
Commonwealth of Virginia Va. Code §§ 2.2-3713, 2.2-3816
City of Richmond

CITY OR COUNTY
400 N. 9th Street, Room 203, Richmond, VA 23219

General District Court

PETITIONER
Charles H. Schmidt, Jr.

PETITIONER

STREET ADDRESS OF COURT
V. Michele S. Howell

RESPONDENT

I, the petitioner, state under oath that:

☒ The following rights and privileges under the Virginia Freedom of Information Act were denied to me by the respondent:

In her official capacity as a FOIA officer for VCU Health Systems, respondent denied my right to inspect a public document, specifically a Letter of Intent between NH District Corporation and VCU Medical Center, that was responsive to my request

These rights and privileges were denied to me by:

☒ the respondent ☐ who denied me these rights and privileges by refusing to release said document and claiming an exemption from release of said document under Va. Code §2.2-3705.7(14)

I have good cause for filing this petition in that: the disclosure of the letter will cause no harm to the competitive nature of the authority because there are no other proposals pending

OR

☐ The respondent ☐ has engaged, is engaged or is about to engage in acts in violation of the Protection of Social Security Numbers

Act by:

(DESCRIBE ACTS)

I ask this court to issue:

☒ a writ of mandamus to require the respondent to act as follows:

☐ an injunction to enjoin (prohibit) the respondent from acting as follows:

Release the Letter of Intent

(DESCRIBE ACTS TO BE REQUIRED OR PROHIBITED)

DATE
01/29/2020

DATE

PETITIONER

Commonwealth of Virginia. ☐ City ☐ County of

Subscribed and sworn to before me this day by:

DATE

☐ CLERK ☐ DEPUTY CLERK ☐ MAGISTRATE

☐ NOT PUBLIC My commission expires:

Notary Registration No

CASE NO. 20002499

PETITIONER(S)
Charles H. Schmidt, Jr.

4310 Dorset Road, Richmond, VA 23234

804-402-0767

ADDRESS/LOCATION

V.

Michele S. Howell, FOIA Officer, VCU Health

RESPONDENT(S)

912 West Grace Street

Richmond, VA 23284

ADDRESS/LOCATION

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NUMBERS ACT**

ATTORNEY(S) FOR PETITIONER(S)

ATTORNEY(S) FOR RESPONDENT(S)

HEARING DATE
AND TIME

2-5-20

10am

**DISABILITY
ACCOMMODATIONS**
for loss of hearing,
vision, mobility, etc.
contact the court ahead
of time