



May 12, 2026

**Via Portal**

Dan Adams  
LCPS FOIA Officer  
Loudoun County Public Schools  
21000 Education Court  
Ashburn, VA 20148

**VFOIA Request: Freedom High School Bathroom Incidents**

Dear Mr. Adams:

America First Legal Foundation (AFL) is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms.

**I. Records request**

Pursuant to the Virginia Freedom of Information Act, CODE § 2.2-3700 *et seq.*, AFL hereby requests:

- All records of complaints presented to teachers or administrators at Freedom High School by students at the school that allege they were photographed or filmed in bathrooms at the school;
- All records of investigations into students filming or photographing other students in the bathrooms at Freedom High School;

- All records and communications which include the terms “bathroom” AND “photographed” OR “recorded” OR “filmed” held by staff at Freedom High School.

The timeframe for this request is August 1, 2023 to the date of processing.

## II. Fee waiver

AFL requests a waiver of all search fees pursuant to CODE § 2.2-3704, which directs agencies to minimize costs placed on requesters to the greatest extent possible. This matter is one of urgent and widespread public concern,<sup>1</sup> and transparency in this matter is manifestly in your interest.

## III. Conclusion

The Virginia Freedom of Information Act requires a response “within five working days of receiving a request.” CODE § 2.2-3704. If access to the records requested takes longer than expected, please provide information about when records might be expected. If any or all parts of this request are denied, please cite each specific exemption you feel justifies the refusal to release the records and provide notification of the appeal procedures available under the law. If you have any questions about this request or believe further discussions regarding search and processing would facilitate a more efficient production of records, then please contact me at FOIA@aflegal.org.

Thank you for your attention to this matter.

Sincerely,

/s/ Ian Prior

Ian D. Prior<sup>2</sup>

America First Legal Foundation

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<sup>1</sup> Nick Minock (@NickMinock), X (May 11, 2026 4:31 PM), <https://perma.cc/QT9T-4XFJ>.

<sup>2</sup> Pursuant to CODE § 2.2-3704(A), the requester certifies that he is a resident and citizen of the Commonwealth of Virginia.