

# **Bond Case Briefs**

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## **PUBLIC RECORDS - VIRGINIA**

### **Keil v. O'Sullivan**

**Supreme Court of Virginia - February 12, 2026 - S.E.2d - 2026 WL 388510**

After city sheriff's office failed to respond to officer's requests for information related to an internal-affairs investigation the sheriff's office had undertaken into officer's conduct pursuant to Government Data Collection and Dissemination Practices Act and sheriff's office claimed an exemption to officer's Virginia Freedom of Information Act (VFOIA) request, officer filed an action challenging sheriff's office's refusal to give him access to the requested information.

The Chesapeake General District Court ruled against officer, and he appealed. The Chesapeake Circuit Court dismissed the action, and officer appealed. The Court of Appeals affirmed, and officer appealed.

The Supreme Court held that:

- Sheriff's office violated Government Data Collection and Dissemination Practices Act by refusing to provide officer access to internal-affairs records, and
- Phrase "may be located" implies no custom search methodology or specialized search terms, as phrase is used in Government Data Collection and Dissemination Practices Act defining "data subject."