

**VIRGINIA :**

**IN THE NINETEENTH JUDICIAL CIRCUIT FOR FAIRFAX, VIRGINIA**

**TRANSPARENT GMU,**  
an unincorporated Virginia association,

and

**AUGUSTUS THOMSON,**

**Petitioners;**

v.

**GEORGE MASON UNIVERSITY,**

and

**GEORGE MASON UNIVERSITY  
FOUNDATION, INC.,**

a Virginia corporation,

**Respondents.**

FILED  
CIVIL INTAKE  
2017 MAY 26 PM 1:16  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

2017 07484

Case No. \_\_\_\_\_

**VERIFIED PETITION FOR MANDAMUS,  
INJUNCTIVE, AND DECLARATORY RELIEF**

This is an action under the Virginia Freedom of Information Act (the Act), Virginia Code §§ 2.2-3700—2.2-3714, seeking disclosure of public records held by George Mason University (the University), a public institution of higher education, and/or George Mason University Foundation, Inc. (the Foundation), an affiliated corporation. In support of this Petition, Transparent GMU and Augustus Thomson (collectively, the Petitioners) attach three affidavits for good cause as Exhibits A, B, and C to this Petition, and further state:

## PARTIES

### *Transparent GMU*

1. Transparent GMU is an unincorporated association, organized and principally operating in Fairfax, Virginia.
2. Transparent GMU's members are present and former George Mason University students—including citizens of the Commonwealth—who are concerned about the potential for large private donations to influence research, curricula, policies, and academic freedom at the University and other public colleges and universities. Although Transparent GMU was first organized in 2016, its members have been advocating for greater transparency between the public and the University and its affiliates since 2014, when they learned that public universities in other states had agreed to give private donors influence over curriculum development and faculty hiring decisions. Concerned that similar agreements may be in place at their own school, Transparent GMU's members have submitted *pro se* record requests under the Act and petitioned the University's President to meet with them and discuss their concerns.
3. As an association, Transparent GMU is considered a "person" under the Act. *See* Virginia Code §§ 1-202, 1-230.

### *Augustus Thomson*

4. Augustus Thomson is a natural person and a citizen and resident of Virginia.
5. Mr. Thomson is currently an undergraduate student at George Mason University.
6. Although Mr. Thomson is a member of Transparent GMU, he also brings this Petition in his individual capacity.

