

**Freyvogel, Christine**

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**From:** Family Blessed [REDACTED]  
**Sent:** Wednesday, February 18, 2026 1:12 PM  
**To:** Freyvogel, Christine  
**Subject:** [EXTERNAL] Written submission -FOIL Appeal

To: Christine Freyvogel

Paralegal to the County Attorney

Tioga County Attorney's Office

56 Main Street, Room 103

Owego, NY 13827

Request [REDACTED] - DSS Case File # [REDACTED]

Hearing Date: February 19, 2026

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Dear Ms. Freyvogel,

Please accept this written submission for distribution to the Legislature in connection with my Freedom of Information Law (FOIL) appeal.

I respectfully request full disclosure of all records maintained by the Tioga County Department of Social Services (DSS) relating to [REDACTED] (Case # [REDACTED] and to matters involving myself.

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## Purpose of Request

This request is made in good faith to obtain a complete and accurate record of DSS actions. The requested records are necessary to ensure a full and reliable record for ongoing appellate proceedings and to protect my legal and constitutional rights, including due process and meaningful access to the courts.

This request seeks records created and maintained during the period in which I was the legal parent and a subject of DSS investigation and court proceedings, as well as records that reference, describe, evaluate, or rely upon my conduct, participation, or statements.

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## Legal Basis

This request is made pursuant to:

- New York Public Officers Law, Article 6 (Freedom of Information Law)
- Public Officers Law §§87 and 89
- Constitutional due process protections under the Fourteenth Amendment

FOIL requires agencies to disclose records unless a specific statutory exemption applies. Any exemption must be narrowly applied, and all reasonably segregable portions of responsive records must be released.

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## Records Requested

I respectfully request disclosure of all responsive records, including but not limited to:

1. Complete DSS Case File

- Intake reports
- Case notes, narratives, and internal logs
- Safety plans, service plans, permanency reports, and risk assessments

2. Internal DSS Communications

- Emails, memoranda, notes, and internal correspondence related to the case

3. External Communications

All communications between DSS and:

- Foster parents or foster care agencies
- Daycare providers
- Schools or school personnel
- Medical, mental health, or service providers

4. Law Enforcement / Investigative Coordination

- Communications between DSS and the Tioga County Sheriff's Office
- Investigator reports, referrals, or coordination documents involving myself or [REDACTED]

## 5. Court-Related Materials

- Documents submitted to Family Court
- Supporting materials, drafts, or preparatory records used in connection with court filings
- Records reflecting statements attributed to me or relied upon by DSS

## 6. Consent or Authorization Records

- Any document signed on my behalf
- Any consent, release, or authorization executed without my knowledge or participation

## 7. Third-Party Reports or Statements

- Written or recorded statements from foster parents, service providers, educators, or other individuals relied upon by DSS

## 8. Audio, Video, or Electronic Records

- Photographs, recordings, or electronic data contained within the case file

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Scope Clarification

This request is limited to records created up to and including the date of termination of parental rights, and to records that reference or evaluate my conduct or participation.

Reasonable redactions may be applied where required by law; however, I request that all non-exempt portions be released.

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#### Format of Production

To reduce administrative burden and cost, I respectfully request that records be provided electronically in PDF format via email or secure digital delivery. If any fees will exceed a minimal amount, please notify me in advance.

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#### Preservation of Rights

This request is made to ensure a complete record for appellate review and to protect my legal rights. It is also intended to obtain records necessary to evaluate and preserve any rights that may exist under federal law, including potential claims arising under 42 U.S.C. §1983.

Nothing in this submission should be interpreted as a waiver of any rights. I respectfully reserve all rights available under federal and state law, including the right to seek judicial review pursuant to CPLR Article 78, if necessary.

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#### Conclusion

This request is submitted respectfully and in good faith. Full disclosure of the requested records is important to ensure transparency, accuracy, and fairness in the administrative and judicial process.

Thank you for your time and consideration and for providing this submission to the Legislature for review.

Respectfully submitted,

Miles A. Floyd

Date: February 18 2026