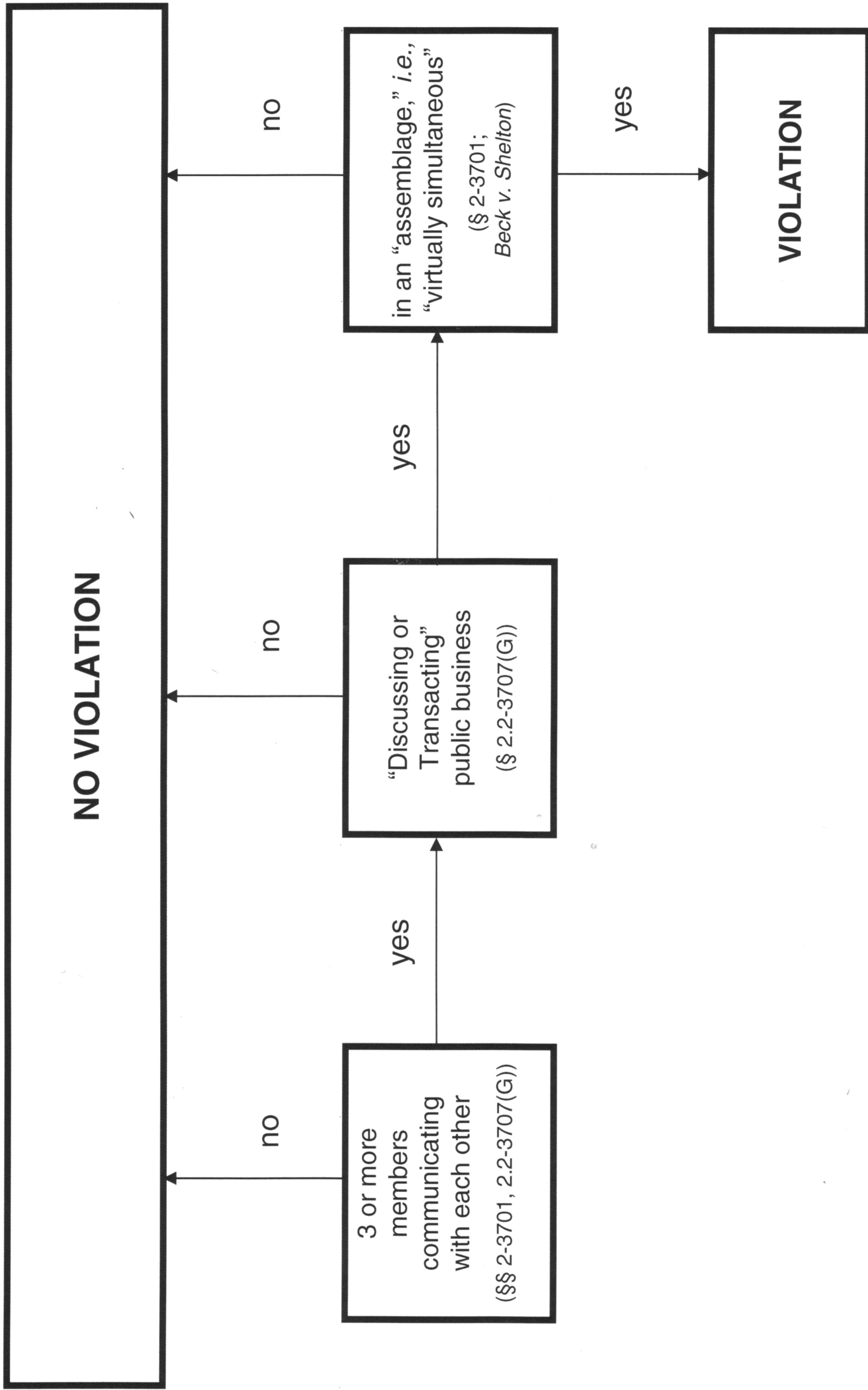


Flow Chart for Determining Improper Meeting Under FOIA



Continuum Discussed in *Beck v. Shelton* Concerning “Simultaneity”

“chat rooms”
“instant messaging”

“letters”
“courier” mail
“facsimile”



“simultaneity inherent
in the term ‘assemblage’”

“functional equivalent
of letter communication
by ordinary mail, courier, or
facsimile transmission”

Beck v. Shelton, 267 Va. 482, 490, 593 S.E.2d 195, 199 (2004)