



NATIONAL CONFERENCE OF STATE LEGISLATURES
 7700 EAST FIRST PLACE DENVER, COLORADO 80230
 303-364-7700 FAX: 303-364-7800

State Laws Related to Who Can Request Public Records and Prisoner Access to Public Records

April 2021

Based on the Reporters Committee for Freedom of the Press' Open Government Guide, 2019

The following 50-state chart includes excerpts from the Reporters Committee for Freedom of the Press' Open Government Guide regarding who can request public records.

According to the Open Government Guide, at least nine states have restrictions on whether or in what circumstances prisoners, inmates, convicted felons, etc., can make public records or FOIA requests. Those states are Alabama, Arkansas, Connecticut, Kentucky, Louisiana, Maine, Michigan, Missouri, Ohio, Wisconsin, West Virginia, and Wisconsin.

In most states, statutes are silent or do not expressly mention access by prisoners, and court decisions may determine access. However, for the states below, entries highlighted in yellow describe statutes or case law that prohibits or restricts prisoner access. Excerpts highlighted in blue below reference situations or laws where prisoners or others are *allowed* access to records.

State	Who can request records? Status of requester
Alabama	By the express terms of the Alabama Public Records Law, the right to inspect and take a copy of public writings of the State of Alabama inures to the benefit of every citizen. <i>See Scott v. Culpepper</i> , 220 Ala. 393, 393-94, 125 So. 643, 644 (1930) (noting that the law "gives every citizen a right to inspect and take a copy" of public records). The statute does not contain a definition of the term "citizen,"... <i>In Person v. State Department of Forensic Sciences</i> , 721 So. 2d 203 (Ala. Civ. App. 1998), the Court of Civil Appeals held that although section 36-12-40 of the Alabama Code gives every citizen the right to inspect and to copy public records, it does not require that state agencies make copies of the records and mail them to prisoners who have asked to review them. Furthermore, the court held, the Department of Forensic Sciences can require an inmate to give reasonable grounds for wanting to inspect public records relating to protocols for drug testing to ensure that the inmate wants the information for a legitimate or proper purpose. <i>Id.</i> at 205.
Alaska	Alaska law makes no distinction as to who may request public records.
Arizona	Under the Arizona Public Records Law, "any person" may inspect public records. A.R.S. § 39-121.
Arkansas	"[A]ny citizen of the State of Arkansas" may make a request. Ark. Code Ann. § 25-19-105(a)(1). However, incarcerated felons may not obtain records of the Department of Correction and the Department of Community Correction.
California	"[A]ccess to information concerning the conduct of the people's business is a

State	Who can request records? Status of requester
	<p>fundamental and necessary right of every person in this state." Cal. Gov't Code § 6250. "Every person" can inspect public records. Cal. Gov't Code § 6253(a). "Person" includes any natural person, corporation, partnership, limited liability company, firm or association. Cal. Gov't Code § 6252(c). The CPRA does not differentiate among those who seek access to public information. If a record is public, as defined by or construed under the CPRA, all persons have the same right of access. <i>Los Angeles Unif. Sch. Dist. v. Superior Court</i>, 228 Cal. App. 4th 222, 242, 175 Cal. Rptr. 3d 90 (2014); <i>Cty. of Santa Clara v. Superior Court</i>, 170 Cal. App. 4th 1301, 1324, 89 Cal. Rptr. 3d 374 (2009); <i>State Bd. of Equalization v. Superior Court</i>, 10 Cal. App. 4th 1177, 1190, 13 Cal. Rptr. 2d 342 (1992).</p>
Colorado	<p>"Any person" may inspect any public record at reasonable times. Colo. Rev. Stat. §§ 24-72-201, 24-72-203(1)(a). "Person" is defined as any natural person, including any public employee and any elected or appointed public official acting in an official or personal capacity, and any corporation, limited liability company, partnership, firm, or association. Colo. Rev. Stat. § 24-72-202(3)....</p> <p>The "person in interest," the person who is the subject of a record, may have greater rights of access to records about that person than do others. See Colo. Rev. Stat. §§ 24-72-204(2)(a)(II), (3).</p>
Connecticut	<p>FOIA provides that "every person shall have the right to (1) inspect [public] records promptly during regular office or business hours, (2) copy such records in accordance with subsection (g) of section 1-212, or (3) receive a copy of such records in accordance with section 1-212." Conn. Gen. Stat. §1-210(a) (emphasis added).</p> <p>FOIA specifically applies to "every person" without reference to citizenship. Conn. Gen. Stat. §1-210(a).</p> <p>Conn. Gen. Stat. §1-210(c) states "[w]henver a public agency receives a request from any person confined in a correctional institution or facility or a Whiting Forensic Division facility, for disclosure of any public record under the Freedom of Information Act, the public agency shall promptly notify the Commissioner of Correction or the Commissioner of Mental Health and Addiction Services in the case of a person confined in a Whiting Forensic Division facility of such request, in the manner prescribed by the commissioner, before complying with the request as required by the Freedom of Information Act." The commissioners have the right to withhold the record if it is exempt under Conn. Gen. Stat. §1-210(b)(18) as a safety, escape or disorder risk.</p>
Delaware	<p>Any Delaware citizen and non-citizen may request records. 29 Del. C. § 10001. However, an agency may reject requests from non-citizens. See <i>McBurney v. Young</i>, 569 U.S. 221 (2013); see also Del. Op. Att'y Gen. 17-IB39, 2017 WL 3628776</p>
Florida	<p>Fla. Stat. § 119.01(1) (2005) provides that "[i]t is the policy of this state that all state, county, and municipal records are open for personal inspection and copying by any person." Person includes "individuals, children, firms, associations, joint ventures, partnerships, estates, trusts, business trusts, syndicates, fiduciaries, corporations, and all other groups or combinations." Fla. Stat. § 1.01(3) (2014).</p>
Georgia	<p>Any person, firm, corporation or other entity may request records under the statute and sue to enforce compliance with its provisions. O.C.G.A. § 50-18-73(a).</p> <p>The right to access public records under the Georgia Open Records Act is a "public right of the People as a whole." <i>Deal v. Coleman</i>, 294 Ga. 170, 184, 751 S.E.2d 337, 349 (2013). Accordingly, what is relevant to proceedings under the Act is whether the</p>

State	Who can request records? Status of requester
	<p>records are "public" not the identity of the requester. No person requesting inspection need have, assert or prove any special personal interest in the requested records. <i>Id.</i>; <i>Smith v. Northside Hosp.</i>, 347 Ga. App. 700, 705, 820 S.E.2d 758, 764 (2018); <i>Northside Realty Ass'n Inc. v. Cmty. Relations Comm'n</i>, 240 Ga. 432, 434, 241 S.E.2d 189, 191 (1978). There is "no reason to distinguish [a death row inmate's] (or any other person's) right of access from news organizations' right of access." <i>Parker v. Lee</i>, 259 Ga. 195, 199, 378 S.E.2d 677, 681 (1989).</p>
Hawaii	<p>Section 92F-13 [(detailing exceptions for disclosure)], each agency upon request by <i>any person</i> shall make government records available for inspection and copying during regular business hours." Haw. Rev. Stat. § 92F-11(b) (emphasis added). Section 92F-3 defines "person" as "an individual, corporation, government, or governmental subdivision or agency, business trust, estate, trust, partnership, association, or any other legal entity."</p> <p>If a person wants to be anonymous, in most circumstances, an agency may not ask or require the requester's name. Water Service Consumption Data, OIP Op. Ltr. No. 90-29 (Oct. 5, 1990); <i>but see</i> Information About Requesters of Conviction Data Records, OIP Op. Ltr. No. 96-4 (Dec. 10, 1996) (Hawaii Criminal Justice Center must allow access to information about individuals who request conviction data).</p>
Idaho	<p>Any person can make a request for access to public records. Idaho Code § 74-102(1). A "person" is broadly defined to mean "any natural person, corporation, partnership, firm, association, joint venture, state or local agency or any other recognized legal entity." Idaho Code § 74-101(9).</p>
Illinois	<p>Every public body must make available to any person for inspection and copying all public records except those identified as exceptions. See 5 ILCS 140/3(a). Person is defined as any individual, corporation, partnership, firm, organization or association, acting individually or as a group. See 5 ILCS 140/2(b).</p>
Indiana	<p>"Any person may inspect and copy the public records of any public agency during the regular business hours of the agency," with exceptions as to which records may or might not be disclosed. Ind. Code § 5-14-3-3(a), § 5-14-3-4</p>
Iowa	<p>The act should be interpreted liberally and should provide broad access to public records. <i>Rathmann</i>, 580 N.W.2d at 777.</p> <p>There is no limitation on who can request records. "Every person shall have the right to examine and copy public records . . ." Iowa Code § 22.2(1) (2017) (emphasis added). <i>See generally Ne. Council on Substance Abuse, Inc. v. Iowa Dep't of Pub. Health</i>, 513 N.W.2d 757 (Iowa 1994).</p>
Kansas	<p>"Any person" may request records. <u>K.S.A. 45-218</u>.</p>
Kentucky	<p>Under Kentucky's Open Records Act, "[a]ll public records shall be open for inspection by any person, except as otherwise provided . . . and suitable facilities shall be made available by each public agency for the exercise of this right." Ky. Rev. Stat. 61.872(1). Kentucky law defines "person" to include "bodies-politic and corporate, societies, communities, the public generally, individuals, partnerships, joint stock companies, and limited liability companies." Ky. Rev. Stat. 446.010(33).</p> <p>There is no requirement that a person making a records request be a Kentucky citizen or resident. As a general matter, the Open Records Act does not treat requests differently based on the status of the requester. However, Kentucky law imposes</p>

State	Who can request records? Status of requester
	various limitations on records requests submitted by incarcerated individuals. See Ky. Rev. Stat. 197.025.
Louisiana	In general, "any person of the age of majority" may request records. La. Rev. Stat. Ann. § 44:31. However, in <i>Vourvoulais v. Movassaghi</i> , 906 So. 2d 561 (La. App. 1st Cir. 2005), the court held that the Act grants a right of action to enforce the right to inspect or copy the public records to <i>only</i> the person who actually made the request... In addition, a convicted felon in custody who has exhausted his or her appellate remedies may not request records unless the request is limited to grounds upon which the individual could file for post-conviction relief. La. Rev. Stat. Ann. § 44:31.1. However, an attorney for an inmate is not bound by § 31.1 and is entitled records, <i>Boren v. Taylor</i> , 223 So.3d 1130 (La. 2017). See also <i>Hilliard v. Litchfield</i> , 822 So. 2d 743 (La. App. 1st Cir. 2002) (finding prisoner was a "person" entitled to bring claim under Public Records Act despite having exhausted his appellate remedies when he brought suit, because status is measured at the time the request was made, not when suit filed).
Maine	Any person "has the right to inspect and copy any public record..." 1 M.R.S.A. § 408-A. The status of the requester is not relevant to a person's right to inspect and copy public records. However, the status of the requester may allow access to certain categories of records that are otherwise exempt from public disclosure (e.g., right of the subject of a criminal proceeding to access to otherwise confidential criminal records or employee access to otherwise confidential personnel records).
Maryland	The Maryland Public Information Act ("PIA" or the "Act"), codified in the General Provisions Article of the Maryland Code Annotated (the "Code") entitles "all persons . . . to have access to information about the affairs of government and the official acts of public officials and employees." Md. Code Ann., Gen. Prov. § 4-103(a). The term "person" is defined in § 1-114 of the Article to mean "an individual, receiver, trustee, guardian, personal representative, fiduciary, representative of any kind, corporation, partnership, business trust, statutory trust, limited liability corporation, firm, association, or other nongovernmental entity.
Massachusetts	Any person can request a public record. G.L. c. 66, § 10(a). While not defined in the statute,... The Supervisor of Public Records has ruled that the law "does not distinguish between requesters," and on that grounds he denied a citizen's request for recordings of calls she herself made to local police. See C. Herman, "Sifting Through Records Appeals," <i>CommonWealth</i> (Jan. 13, 2011).
Michigan	The FOIA provides that "[e]xcept as expressly provided in [Mich. Comp. Laws Ann. § 15.243], upon providing a public body's FOIA coordinator with a <i>written request</i> that describes a public record sufficiently to enable the public body to find the public record, a <i>person</i> has a right to inspect, copy, or receive copies of the requested public record of the public body." Mich. Comp. Laws Ann. § 15.233(1) (emphasis added). Mich. Comp. Laws Ann. § 15.232 defines a "person" as an "individual, corporation, limited liability company, partnership, firm, organization, association, governmental entity, or other legal entity." <i>Id.</i> § 15.232(g). However, "person" does not include "an individual serving a sentence of imprisonment in a state or county correctional facility in this state or any other state, or in a federal correctional facility." <i>Id.</i> ; see also <i>Proctor v. White Lake Twp. Police Dep't</i> , 248 Mich. App. 457, 639 N.W.2d 332 (2001) (FOIA prisoner exclusion not a constitutional deprivation).

State	Who can request records? Status of requester
Minnesota	Any "person" may request access to data under the Act. Minn.Stat. § 13.03, subd. 3(a). A "person" is defined as any individual, partnership, corporation, association, business trust, or a legal representative of an organization. Minn. Stat. § 13.02, subd. 10.
Mississippi	Under Mississippi law, "any person" may request records. "Any person" may request records under the Act. § 25-61-5; Op. Att'y Gen. Aug. 1, 1984 to Earline Dugan.
Missouri	<u>Mo. Rev. Stat. § 610.011</u> . Liberal construction of law to be public policy. — 1. It is the public policy of this state that meetings, records, votes, actions, and deliberations of public governmental bodies be open to the public unless otherwise provided by law. Sections <u>610.010 to 610.200</u> shall be liberally construed and their exceptions strictly construed to promote this public policy.
Montana	Mont. Code Ann. § 2-6-1006 authorizes a "person" to request public information from a public entity.
Nebraska	Neb. Rev. Stat. §84-712 allows "all citizens of this state, and all other persons interested in the examination of the public records," to examine public records. Furthermore, Neb. Rev. Stat. §84-712.03 allows "any person" to seek redress for the wrongful withholding of records. Generally, the use of the term "person" in Nebraska statutes "includes bodies politic and corporate, societies, communities, the public generally, individuals, partnerships, joint stock companies, and associations." Neb. Rev. Stat. §49-801(16) (Reissue 2010).
Nevada	Any person may request records under the Nevada Public Records Act ("NPRA"). NRS 239.0107(1).
New Hampshire	Any person or entity may seek relief under the Statute. RSA 91-A:4 provides that "every citizen" has access to "public records" of public agencies and public bodies,
New Jersey	Under OPRA, any "citizen of this State" has the right to inspect and copy public records. N.J.S.A. 47:1A-1. Although OPRA expressly provides that "government records shall be readily accessible...by citizens of this State" (N.J.S.A. 47:1A-1), the New Jersey Attorney General's Office has advised of its position that OPRA does not prohibit access by residents of other States. Under the common law, the applicant must have an interest in the subject matter of the material sought, but the media's role as the "eyes and ears of the public" is usually sufficient to confer standing. <i>Home News v. New Jersey Dept. of Health</i> , 144 N.J. 446, 454, 539 A.2d 736 (1996).
New Mexico	Every person has the right to inspect any public record. NMSA 1978 § 14-2-1 (2011).
New York	Not limited. The statute states that "the public, individually and collectively and represented by a free press, should have access to the records of government." N.Y. Pub. Off. Law § 84 (McKinney 1988). The law must be liberally construed to grant maximum public access to governmental records. <i>See Newsday, Inc. v. Sise</i> , 71 N.Y.2d 146, 150, 524 N.Y.S.2d 35, 37 (1987), <i>cert. denied</i> , 486 U.S. 1056, 108 S.Ct. 2823 (1988); <i>Capital Newspapers v. Whalen</i> , 69 N.Y.2d 246, 252, 513 N.Y.S.2d 367, 371 (1987); <i>Lucas v. Pastor</i> , 117 A.D.2d 736, 498 N.Y.S.2d 461 (2d Dep't 1986); <i>N.Y. News Inc. v. Grinker</i> , 142 Misc.2d 325, 537 N.Y.S.2d 770 (Sup. Ct. N.Y. Cty. 1989).
North Carolina	The Public records law provides, in G.S. § 132-6, that public records may be requested by "any person."
North Dakota	There is no limitation in the statute regarding who can request records—any member of the public can request or view records.

State	Who can request records? Status of requester
Ohio	<p>"Any person" is entitled to inspect or receive a copy of a public record; the right is not limited to U.S., state, or community citizens. Ohio Rev. Code § 149.43(B).</p> <p>The term "any person" is "broad and permits anyone, including any recognized business entity (defendants, newspapers, researchers, designees and/or nondesignees) to obtain records." <i>State ex rel. Quolke v. Strongsville City School Dist. Bd. Of Edn.</i>, 142 Ohio St.3d 509, 514, 33 N.E.3d 30, 34 (2015).</p> <p>An incarcerated person, however, must obtain a judge's consent before gaining access to public records unless the judge decides that the records would support a "justiciable claim" of the inmate. Ohio Rev. Code § 149.43(B)(8); <i>State ex rel. Sevayega v. Reis</i>, 88 Ohio St. 3d 458, 727 N.E.2d 910 (2000).</p>
Oklahoma	<p>Any person has the right of access to and review of government records. 51 O.S. § 24A.2. The Act does not limit access based on the purpose for which the documents are sought nor does it restrict future use of the information received.</p>
Oregon	<p>Every person, regardless of nationality or residency, has a right to inspect any public record that is not expressly exempt from disclosure. ORS 192.314(1) (formerly ORS 192.420(1)). ORS 192.311(3) (formerly 192.410) defines "person" to include any natural person, corporation, partnership, firm or association, and any member or committee of the legislature. A public body may not use ORS 192.311(3) to request public records. Attorney General Manual, § I.A. The identity of the person seeking disclosure of a particular record may be relevant when a statutory exemption to disclosure requires a determination of the public interest in disclosure.</p>
Pennsylvania	<p>A requester need only be a "[a] person that is a legal resident of the United States." 65 Pa. Stat. Ann. § 67.102.</p>
Rhode Island	<p>The APRA is unlimited as to who may request to inspect or copy public records. "Every person or entity" may make such request. R.I. Gen. Laws § 38-2-3(a)(2012).</p>
South Carolina	<p>"Any person has a right to inspect or copy any public record." S.C. Code Ann. § 30-4-30(a). "Person" is defined to include individuals and entities. S.C. Code Ann. § 30-4-20(b).</p>
South Dakota	<p>"[A]ll citizens of [South Dakota], and all other persons interested..." SDCL §1-27-1.</p>
Tennessee	<p>Any citizen of the state of Tennessee can request access to any records that are deemed to be records of public bodies. In 1998, the Supreme Court overturned earlier case law and held that a convicted felon is still a citizen for purposes of being able to seek access to public records. <i>Cole v. Campbell</i>, 968 S.W.2d 274 (Tenn. 1998) (overturning <i>Roberson v. Rose</i>, 17 TAM 3-28 (Tenn. Ct. App. Dec. 31, 1991) and <i>Ray v. Stanton</i>, C.A. No. 88-285-II (Tenn. Ct. App. Feb. 24, 1989));</p>
Texas	<p>Anyone, citizens and non-citizens alike, can request Texas public information, for any reason or use. The Texas Public Information Act (the "Act"), Tex. Gov't Code § 552.001 <i>et seq.</i> (formerly Tex. Rev. Civ. Stat. Ann. art. 6252-17a), places no limits on who can request public records. <i>See City of Garland</i>, 165 S.W.3d at 820 ("Public information' must be made available to the public upon request by any person.") The Act does not require that the requestor be a Texas resident. Section 552.221(a) of the Act specifically directs the officer for public information to produce public information on "application" by "any person." This is consistent with the Act's policy, which is specifically set forth in Section 552.001(a):</p>
Utah	<p>In Utah, the Government Records Access and Management Act ("GRAMA") governs access to public records. GRAMA states that "[e]very person has the right to inspect a</p>

State	Who can request records? Status of requester
	<p>public record free of charge, and the right to take a copy of a public record during normal working hours" Utah Code § 63G-2-201(1).</p> <p>Under GRAMA, "a record is public unless otherwise expressly provided by statute." <i>Id.</i> § 63G-2-201(2).</p> <p>GRAMA restricts access to all records that are classified as "private," "controlled," or "protected." <i>Id.</i> § 63G-2-201(3)(a).</p> <p>GRAMA also restricts access to all records "to which access is restricted pursuant to court rule, another state statute, federal statute, or federal regulation, including records for which access is governed or restricted as a condition of participation in a state or federal program or for receiving state or federal funds." <i>Id.</i> § 63G-2-201(3)(b).</p>
Vermont	<p>"Any person may inspect or copy any public record of a public agency." 1 V.S.A. § 316(a). There is no limitation on or definition of the term "person." Neither the motivation of the requester nor her or his use of the information or documents creates any restrictions. <i>Shlansky v. City of Burlington</i>, 2010 VT 90, ¶ 11, 13 A.3d 1075, 1080-81 (Vt. 2010); <i>Finberg v. Murnane</i>, 159 Vt. 431, 437, 623 A.2d 979, 983 (Vt. 1992).</p> <p>However, if records are sought by a party for use in a pending or ongoing litigation, they will likely be exempt from disclosure as "relevant to litigation" under 1 V.S.A. § 317(c)(14). <i>See Wesco Inc. v. Sorrell</i>, 2004 VT 102, ¶ 17, 865 A.2d 350, 356 (Vt. 2004).</p> <p>The identity of the person requesting a record is irrelevant when determining whether a request under the Public Records Act should be granted. <i>Finberg v. Murnane</i>, 159 Vt. 431, 437, 623 A.2d 979, 983 (Vt. 1992).</p>
Virginia	<p><i>a. Citizens of the Commonwealth:</i> Any citizen of the Commonwealth may inspect records during the regular business hours of the custodian of records. A citizen is defined elsewhere in the Code of Virginia as one born in the Commonwealth who has not in good faith become a citizen of another state or one born in another state of this Union or an alien naturalized under the laws of the United States who may be or become a resident of the Commonwealth.</p>
Washington	<p>Any person may request records. RCW 42.56.080. "Person" includes an individual, public, private or governmental entity, or "any other organization or group of persons, however organized." RCW 42.17.020(35) (2000). A requester does not have to establish a "need to know" in order to obtain access. RCW 42.56.080; <i>Yacobellis v. City of Bellingham</i>, 55 Wn. App. 706, 780 P.2d 272 (1989), <i>pet. for review denied</i>, 114 Wn.2d 1002, 788 P.2d 1077 (1990).</p>
West Virginia	<p>Any person or entity may obtain access to records through the Freedom of Information Act except state or federal inmates seeking information in support of a <i>habeas corpus</i> petition. The statute provides that "[e]very person has a right to inspect or copy any public record" and specifies the term "'[P]erson' includes any natural person, corporation, partnership, firm or association." W. Va. Code § 29B-1-2.</p> <p>Any person or entity may obtain access to records. However, the West Virginia Supreme Court has held that individuals incarcerated in state or federal facilities "may not use [FOIA] to obtain court records for the purpose of filing a petition for writ of <i>habeas corpus</i>." Syl. Pt. 3, <i>State ex rel. Wyant v. Brotherton</i>, 214 W. Va. 434, 589 S.E.2d 812 (2003). Instead, a state inmate is limited to the discovery available to him under the West Virginia Rules Governing Post-Conviction Habeas Corpus Proceedings. See also, <i>Smith v. Shoemaker</i>, 2012 WL 5232225 (2012) (<i>per curiam</i>) (unpublished opinion).</p>

State	Who can request records? Status of requester
Wisconsin	<p>“[A]ny requester has a right to inspect any record.” Wis. Stat. § 19.35(1)(a) (2003–04). A “requester” is generally any person who requests access to a record, but “committed or incarcerated” persons face certain restrictions on their access. <i>Id.</i> § 19.32(3). An individual may inspect or copy a record containing information pertaining to that individual, notwithstanding that other persons may not, unless the information was collected in connection with a complaint, investigation or enforcement proceeding, or would endanger an individual’s life or safety, identify a confidential informant, endanger the safety of any state correctional institution, or compromise the rehabilitation of a person in the department of corrections. Wis. Stat. §§ 19.35(1)(am), 19.35(4)(c).</p>
Wyoming	<p>Any person has the right to request inspection of public records and to make copies of those records. The courts have allowed media corporations and citizen associations to seek records. The identity of the requester or the purpose for which the records are sought are irrelevant as to whether the record is available for public access. The pertinent question is whether the record is available to public. If so, anyone may inspect it. <i>Laramie River Conversation Council v. Dinger</i>, 567 P.2d 731 (Wyo. 1977); <i>Shaeffer v. University of Wyoming</i>, 2006 WY 99.</p>
District of Columbia	<p>Any “person” has a right to inspect or copy any public record not exempted from disclosure. D.C. Code Ann. § 2-532(a). The term “person” “includes individuals, partnerships, corporations, associations, and public or private organizations of any character other than the Mayor, the Council, or an agency.” D.C. Code Ann. § 2-502(9); <i>see also</i> D.C. Code Ann. § 2-539(a)(8) (providing that definition of “person” from § 2-502 applies).</p>