March 9, 2022

Delegate David LaRock Pocahontas Building 900 E. Main St, Richmond, Virginia 23219 DelDLaRock@house.virginia.gov

Re: Freedom of Information Act Request

Dear Delegate LaRock's office:

I, Tosin Akintola, make this request for records pursuant to the Virginia Freedom of Information Act (§ 2.2-3700, *et seq.*) of the Code of Virginia.

Specifically, I request:

- 1. All correspondence between Virginia House of Delegates Member Dave LaRock and Thomas Edward Caldwell, sent or received between November 3, 2020 and August 5, 2021.
- 2. All communications from November 3, 2020 to April 6, 2021 that include any of the following words and phrases:
 - a. "Stop the Steal" or "#StopTheSteal";
 - b. "Save America Rally";
 - c. "Million MAGA March";
 - d. "Trump rally";
 - e. "Make America Great";
 - f. "January 6";
 - g. "U.S. Capitol";
 - h. "Proud Boys";
 - i. "Oath Keepers".

Please search for responsive records regardless of format, medium, or physical characteristics. I seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. My request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. My request also includes any attachments to emails and other records, as well as emails to which the subjects of this request were cc'ed or or bcc'ed.

If it is your position that any portion of the requested records is exempt from disclosure, please provide an index of records or categories of records that have been withheld and the reasons the records or categories of records have been withheld. If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records. This request is made for

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noncommercial purposes. The release of information obtained through this request is not in my financial interest.

Thomas Edward Caldwell was indicted for seditious conspiracy due to his involvement in the January 6 insurrection.¹ Delegate LaRock was also present for "Stop the Steal" events in Washington on that day. News reports have shown Delegate LaRock has a relationship with Caldwell.² The requested records would shed light on Delegate LaRock's correspondence with Caldwell around the January 6 insurrection, as well as on Delegate LaRock's own involvement in events that day.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at takintola@citizensforethics.org. Where possible, please produce records in electronic format. Please send the requested records to me at takintola@citizensforethics.org or Tosin Akintola,

Sincerely,

Tosin Akintola

¹ <u>https://www.justice.gov/usao-dc/defendants/caldwell-thomas-edward</u>

² <u>https://www.winchesterstar.com/winchester_star/insurrectionist-suspect-active-in-local-politics/article_d375bcd1-0184-58c8-ab48-dcc30a0633b6.html</u>