

March 30, 2015

Mary Yancey Spencer Deputy Executive Director Virginia State Bar 1111 East Main Street, Suite 700 Richmond, VA 23219-3565 spencer@vsb.org

**Re:** Freedom of Information Act Request

Dear Ms. Spencer:

I represent William A. Jacobson of WAJ Media LLC, a New York state LLC which publishes internet magazines with circulation in Virginia, and Daniel Halper, a resident of Annandale, Virginia. Pursuant to the Virginia Freedom of Information Act (Virginia Code Ann. §§ 2.2-3700, *et seq.*), we request all records of the Virginia State Bar ("VSB"), including records created by or in the possession of its President Kevin Martingayle and President-Elect Edward L. Weiner, regarding the Mid-Year Legal Seminar originally scheduled for November 2015 in Israel (the "Israel Trip"), including but not limited to such records as relate to:

- 1. The Mid-Year Legal Seminar Committee;
- 2. The planning and scheduling of the Israel Trip, including without limitation all contracts and agreements entered into with regard to airlines, hotels and other services;
- 3. The cancellation of the Israel Trip, including without limitation all communications with airlines, hotels and other services;
- 4. The drafting and finalization of the March 27, 2015 email from Kevin Martingayle to the VSB membership;
- 5. The drafting and finalization of the March 29, 2015 email from Kevin Martingayle and Edward Weiner to the VSB membership;
  - 6. Communications with state agencies;
  - 7. Communications with elected officials;
  - 8. Communications with the public;

- 9. Communications with media;
- 10. Communications with VSB members;
- 11. Communications with the U.S. Department of State or other U.S. government persons;
  - 12. Communications with the Embassy of Israel or other Israeli government persons;
- 13. Communications with The David Citadel Hotel, including but not limited to contracts and other agreements setting forth the terms and conditions for booking and cancellation of the hotel facilities:
- 14. Communications with Tour Plan International, including but not limited to contracts and other agreements setting forth the terms and conditions for booking and cancellation of the services;
  - 15. The March 25, 2015 email to VSB members regarding the Israel Trip;
  - 16. Complaints regarding the Israel Trip;
- 17. Documents regarding penalties, fees or other costs that would have come due on or about April 1, 2015, if the Israel Trip were not cancelled by that date;
- 18. Documents regarding the minimum 60-person sign-up requirement for the Israel Trip.

The time frame for this request is March 30, 2014 through March 30, 2015.

Any reasonably segregable portion of a record otherwise exempt from disclosure is required to be made available after deletion of the portions that are exempted by law and a written explanation must be provided as to why certain information was redacted. Va. Code Ann. § 2.2-3704(B)(3)

In the public's interest, we ask for a fee waiver. As a media organization with circulation in Virginia, WAJ Media LLC has proven history of turning raw records obtained via public records requests into distinct editorial works and disseminating them to the public through it online blog known as "Legal Insurrection." In the event that our request for a fee waiver is denied, we are willing to pay up to \$200, but ask that we be notified in advance of cost estimates pursuant to Va. Code Ann. § 2.2-3704(F).

We look forward to receiving records in five (5) business days Va. Code Ann. § 2.2-3704(E). To facilitate the response, we are willing to receive records in electronic format via email Va. Code Ann. § 2.2-3704(G).

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If you do not understand this request or any portion thereof, or if you feel you require clarification of this request or any portion thereof, please contact me immediately at 202-646-5175 or at jpeterson@judicialwatch.org.

Thank you for your attention to this matter.

Sincerely,

/s/ James F. Peterson

James F. Peterson VSB No. 36211

cc: President Kevin Martingayle President-Elect Edward L. Weiner