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# LATHAM & WATKINS LLP

November 18, 2024

## VIA EMAIL

Frederick Cooke  
Rubin, Winston, Diercks, Harris & Cooke, L.L.P.  
1250 Connecticut Avenue, NW  
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Lanet Scott  
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Re: Request for Meeting and for Documents

Dear Mr. Cooke and Ms. Scott:

We are writing to follow up on our October 29, 2024 letter on behalf of the Ad Hoc Committee of the Council for the District of Columbia (the “Ad Hoc Committee”) established on August 23, 2024. As you know, the Ad Hoc Committee was formed for purposes of conducting an investigation into whether your client, Councilmember Trayon White, violated the law or the Code of Conduct or Council Rules by taking any action that adversely affects the confidence of the public in the integrity of the District government, outside activities, use of government resources, or acting solely in the public interest, or by residing in a ward other than Ward 8.

In our October 29 letter, enclosed, we requested a meeting with Councilmember White and asked for the production of materials pertinent to our investigation. During a call on October 30, 2024, you informed us that Councilmember White declined both the interview request and the request to produce the requested materials.

We are writing now to offer Councilmember White another opportunity to cooperate in the Ad Hoc Committee’s investigation by participating in an interview and by providing information and materials relevant to the Ad Hoc Committee’s investigation. With respect to an interview, we renew our request to meet with Councilmember White to discuss the matters under investigation and any information Councilmember White believes may be relevant. With respect to the production of relevant documents, we renew our request for copies of all materials in Councilmember White’s possession that relate to the scope of this investigation, including but not limited to all documents specifically requested in our October 29 letter.

LATHAM & WATKINS <sup>LLP</sup>

In addition, we now request copies of the following additional records in Councilmember White's possession:

- (1) All documents, records, and communications, including text messages, concerning Councilmember White's interactions with [REDACTED];
- (2) All documents, records, and communications, including text messages, relating to the operations of [REDACTED];
- (3) All documents, records, and communications, including text messages, relating to Councilmember White's interactions with any DYRS or ONSE personnel;
- (4) All documents, records, and communications, including text messages, concerning Councilmember White's occupancy at [REDACTED] at the 10K Hill South Apartments located at 10 K Street SE, Washington D.C., including his July 2022 occupancy application; and
- (5) All documents, records, and communications, including text messages, concerning Councilmember White's interactions with [REDACTED].

As stated in our previous letter, we are happy to work with you to establish a reasonable timeline for scheduling an interview with Councilmember White and for providing the requested records, mindful of the Committee's obligation to conclude its investigation by December 16, 2024.

Please acknowledge receipt of this correspondence and promptly confirm that you will comply with the production obligations. To maintain the integrity of this investigation, please also keep this Request for Meeting and for Documents and all of your communications with the undersigned confidential. If you need assistance with providing relevant documents, or have any other questions, please contact me directly ([Danielle.Conley@lw.com](mailto:Danielle.Conley@lw.com)).

Sincerely,



Danielle Conley  
of LATHAM & WATKINS LLP

Enclosures

**ENCLOSURE**

**October 29, 2024 Ad Hoc Committee Letter  
to Counsel for Councilmember White**

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October 29, 2024

## VIA EMAIL

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Re: Request for Meeting and for Documents

Dear Mr. Cooke and Ms. Scott:

We write on behalf of the Ad Hoc Committee of the Council for the District of Columbia (the "Ad Hoc Committee") established on August 23, 2024, pursuant to District of Columbia Council Rule 651. The Committee was formed for purposes of conducting an investigation into whether your client, Councilmember Trayon White, violated the law or the Code of Conduct or Council Rules by taking any action that adversely affects the confidence of the public in the integrity of the District government, outside activities, use of government resources, or acting solely in the public interest, or by residing in a ward other than Ward 8. We have been retained to assist the Ad Hoc Committee in this investigation, in accordance with the Rules of Organization and Procedure for the Council of the District of Columbia.

### **A. Request for Interview**

To fulfill the Committee's mandate under D.C. law, we respectfully request a meeting with Councilmember White to discuss these matters and any information Councilmember White believes is relevant to the investigation. Please provide availability for Councilmember White and any counsel who will be attending for the week of November 4, 2024.

**B. Request to Preserve and Provide Documents, Records, Communications, and Other Materials**

We request that Councilmember White retain all communications, documents, media, or records that may be relevant to this investigation. Further, we request copies of all materials in Councilmember White's possession that relate to the scope of this investigation, including all materials related to Councilmember White's residency in Ward 8 or any other ward, and all materials related to the bribery allegations against Councilmember White.

As part of this request, we specifically request the production of the following information for the time period of January 1, 2019, through the present:

- (1) All documents, records, and communications, including text messages, concerning Councilmember White's involvement with the Department of Youth Rehabilitation Services (DYRS), including any such materials related to the Credible Messenger Initiative and companies seeking or holding contracts with DYRS;
- (2) All documents, records, and communications, including text messages, concerning Councilmember White's involvement with the Office of Neighborhood Safety and Engagement (ONSE), including any such materials related to the companies seeking or holding contracts with ONSE;
- (3) All bank account statements for all accounts held by Councilmember White;
- (4) All documents submitted to the United States Attorney's Office in the case *United States v. Trayon White, Sr.*, No. 24-cr-00406 (D.D.C. filed August 18, 2024);
- (5) All correspondence with and payments made to the District of Columbia Office of Campaign Finance;
- (6) All documents, records, and communications concerning Councilmember White's residence in Ward 8, such as mortgage statements, tax statements, utility bills, insurance statements, or other documents relating to residency;
- (7) All documents, records, and communications concerning Councilmember White's residence or occupancy at any property outside of Ward 8, such as lease agreements, occupancy agreements, rental applications, rent invoices, utility bills, insurance statements, or other documents relating to residency; and
- (8) All documents, records, and communications concerning Councilmember White's presence at the 10K Hill South Apartments located at 10 K Street SE, Washington, D.C. 20003, including but not limited to all records related to Apartment [REDACTED].

To the extent there are additional materials that Councilmember White believes may be relevant to the scope of the Ad Hoc Committee's investigation, please also provide all such materials.

LATHAM & WATKINS<sup>LLP</sup>

We are happy to work with you to establish a reasonable timeline for providing these files, mindful of the Committee's obligation to conclude its investigation by December 16, 2024. If you believe that potentially relevant documents have not been preserved, please contact me immediately. To maintain the integrity of this investigation, please keep this Request for Meeting and for Documents and all of your communications with the undersigned confidential.

Please acknowledge receipt of this correspondence and promptly confirm that you will comply with the production obligations. If you need assistance with providing relevant documents, or have any other questions, please contact me directly ([Danielle.Conley@lw.com](mailto:Danielle.Conley@lw.com)).

Sincerely,

A handwritten signature in blue ink that reads "Danielle Conley". The signature is fluid and cursive, with a long horizontal stroke extending to the left from the start of the name.

Danielle Conley  
of LATHAM & WATKINS LLP