

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

DAVID CANTOR

Petitioner,

v.

Case No. _____

VIRGINIA DEPARTMENT OF
CORRECTIONS

Respondent.

AFFIDAVIT OF DAVID CANTOR

Affiant David Cantor states as follows:

1. I am a freelance journalist and resident of Richmond, Virginia. My work regularly appears in local, regional, and national outlets. I have reported on Red Onion State Prison since 2025 after learning of the 2024 self-immolation incidents at the prison.

2. I have read the petition filed herewith and know its contents.

3. The statements in the petition are true to my own knowledge, or upon information and belief. As to those statements based upon information and belief, I believe those statements to be true.

4. **Exhibit A** is a true and correct copy of an email I sent to the Virginia Department of Corrections (“VADOC”) on October 2, 2025, pursuant the Virginia Freedom of Information Act, Va. Code § 2.2-3700, *et seq.* (“VFOIA”), requesting “Taser logs or any documentation of taser use at Red Onion State Prison from Jan. 1, 2025 to the present day” (the “Request”).

5. **Exhibit B** is a true and correct copy of a letter I received from VADOC on October 21, 2025, responding to my Request.

6. Exhibit C is a true and correct copy of VADOC Operating Procedure 420.1 with the subject "Use of Force," and an Effective Date of March 1, 2023, that I received pursuant to a VFOIA request to VADOC not at issue in this matter.

7. VADOC did not produce the records I requested on October 2, 2025.

8. Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the forgoing is true and correct.

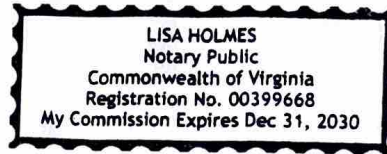

David Cantor

Sworn to before me this

10th day of April, 2026



NOTARY PUBLIC



My commission expires: Dec 31, 2030