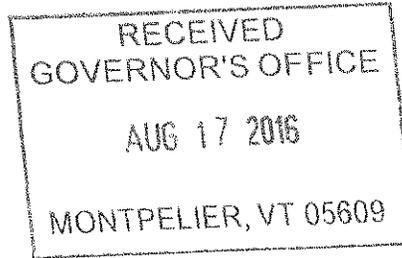


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Norman Williams
Special Counsel
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August 16, 2016

Office of the Governor
State of Vermont
ATTN: Custodian of Records
109 State Street, Pavilion
Montpelier, VT 05609

Re: Public Records Request

Dear Sir or Madam:

I am writing to request the following records under the Vermont Public Records Act ("PRA"), VT. STAT. ANN. tit. 1, §§ 315 *et seq.*:

1. For the period December 1, 2009 to March 15, 2016, all e-mails sent or received by the Governor or any individual employed by the Office of the Governor which contain the names Leopold, Jonathan (referring to Jonathan Leopold), or Osier.

This request reasonably describes identifiable records, and I am unaware of any express provisions of law that exempts the requested records from disclosure. Article 6 of the Vermont Constitution establishes that "all officers of government, whether legislative or executive, are . . . accountable to [the people]." Accordingly, I request that you "promptly produce" documents for inspection and copying. VT. STAT. ANN. tit. 1, § 318(a). Records should be made available in their original format, whether that be on paper or in electronic form. *See* VT. STAT. ANN. tit. 1, § 316(h).

Time is of the essence in this request, and we anticipate that the Department will fully comply with its obligations under the PRA. Please make the requested documents available for inspection at your earliest convenience. Further, if one or more categories (or portions of categories) of requested documents are located prior to the balance of the requested document, please make those documents available for inspection without delay, and make the balance available for inspection on a rolling basis. If there are any fees for searching or copying these records, please inform us so we can properly remit payment.

If a portion of the information we have requested is exempt from disclosure by express provisions of law, section 318(e) requires redaction and production of the record accompanied by

Office of the Governor

August 16, 2016
Page 2

an explanation of the basis for denial of the redacted information. VT. STAT. ANN. tit. 1, § 318(e). If the record we have requested is exempt from inspection by express provisions of law, you must so certify in writing, and identify the record withheld. A certification must include the asserted statutory basis for denial and a brief statement of the reasons and the supporting facts for denial. VT. STAT. ANN. tit. 1, § 318(a)(2). A record shall be produced for inspection or a certification shall be made that a record is exempt within three business days of the request, absent certain "unusual circumstances" specified in the statute. VT. STAT. ANN. tit. 1, § 318(a)(2) & (5).

Thank you for your timely attention to this request. Please feel free to contact me at (802) 658-0220 with any questions.

Very truly yours,

GRAVEL & SHEA PC



Norman Williams

NCW:nl