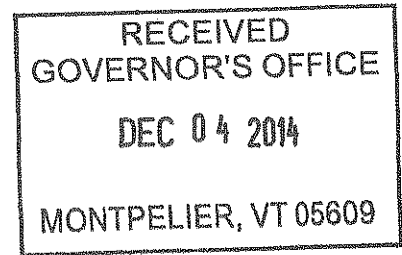


THE  
PATRIOTS  
FOUNDATION



December 3, 2014

Public Records Request  
Office of Governor Peter Shumlin  
Attn: Public Records Custodian  
109 State Street, Pavilion  
Montpelier, VT 05609

**RE: Public Records Request**

To Whom It May Concern:

On behalf of The Patriots Foundation (PF), a Section 501(c)(3) non-profit organization, and in consultation with my lawyers at Holtzman Vogel Josefiak PLLC, I make this request for records pursuant to the Vermont Public Records Law. 1 V.S.A. § 315, *et seq.* I request that a copy of the records detailed below be provided to me. I do not wish to inspect the records first.

I seek any and all "public records," as that term is defined under the Public Records Law (1 V.S.A. § 317(b)), existing in any format whatsoever, including, but not limited to, written correspondence, email correspondence, records of telephone correspondence, records pertaining to in-person meetings, calendar or scheduling entries, videotapes, photographs, computer print-outs, telephone messages, or voice mail messages, *etc.*, and consisting of correspondence in any form whatsoever and without limitation, or detailing meetings or discussions in any form whatsoever and without limitation, *between*:

1. Governor Peter Shumlin, or any authorized agent, employee, or representative thereof,
- and*
2. Dr. Jonathan Gruber, and/or any employee, agent, or representative of Dr. Gruber or the Massachusetts Institute of Technology Department of Economics;
- 3.

*Regarding and/or mentioning and/or otherwise referring to:*

- a. Affordable Care Act;
- b. Gruber Microsimulation Model;
- c. Green Mountain Care; or
- d. GMSIM.

This request seeks any and all records in the possession of any custodian of records of the Office of the Governor of Vermont meeting the above criteria for the period January 1, 2012 to December 1, 2014.

In addition, I seek any contract that exists between the State of Vermont and Dr. Jonathan Gruber relating to services rendered to analyze the impacts of the implementation of the Affordable Care Act in Vermont.

The Patriots Foundation is willing to pay the appropriate fees incurred and assessed for the copying of public records that the agency finds responsive to this request, or for appropriate and reasonable staff time dedicated to the search of documents in excess of 30 minutes. 1 V.S.A. § 316(b).

Please search for responsive records regardless of format, medium, or physical characteristics. I request that responsive records be produced in native format, or the format most felicitous to an expedited production. Upon receipt of this request, please take all reasonable steps to preserve relevant public records while the request is pending.

In the event that some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable, non-exempt portions of the requested records. Please clearly delineate any and all redactions in such a manner so that the justification for each redaction is apparent. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

If you have any questions about this request, please do not hesitate to contact me at (515) 497-0503 or [craig@thepatriotsfoundation.com](mailto:craig@thepatriotsfoundation.com), or my counsel, Steve Donaldson at (540) 341-8808. Please send the requested documents to my attention at:

Craig Robinson  
The Patriots Foundation  
6601 Westown Parkway, Suite 240  
West Des Moines, IA 50266

Because of the time-sensitive nature of this request, I ask that the Office of the Governor strictly adhere to all deadlines requirement as provided by law by either furnishing the requested documents or advising as to the time that such documents will be available. See 1 V.S.A. § 318. I also respectfully request that documents be made available as soon as they are located and reviewed via a rolling production. The Patriots Foundation will undertake to pay any and all reasonable increased costs incurred as part of a rolling production.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Robinson', with a stylized, flowing script.

Craig Robinson  
The Patriots Foundation