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**Sent:** Wednesday, December 4, 2024 4:32 PM  
**To:** Tom Nuovo <tnuovo@vtlawoffices.com>  
**Cc:** Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Paula White <pwhite@vtlawoffices.com>  
**Subject:** RE: Public Records Request - Rec'd 11/26/24

Hi Tom,

Thanks for the quick conversation clarifying your request. See 1 V.S.A. § 318(d). To recap, you are seeking the following records from the AGO's Criminal or Civil Divisions:

- 1) Any reports, correspondence, or documents related to investigations conducted by the Vermont State Police or other state agencies concerning Shambhala or Karma Choling in Barnet, Vermont.
- 2) Records of any legal proceedings or complaints filed against Shambhala or Karma Choling in Barnet, Vermont.
- 3) Any communications between state officials and representatives of Shambhala or Karma Choling in Barnet, Vermont.
- 4) Any communications between any state officials, including the State Police, involving incidents of sexual abuse or any nature, including minors, alleged to have taken place at Shambhala or Karma Choling in Barnet, Vermont.

You are not seeking any records that may be in the Attorney General's Office's possession related to the litigation concerning the constitutionality of 12 V.S.A. § 522 (2019). See *A.B. v. S.U.* 2023 VT 32, 298 A.3d 573; *Bihari v. Shambhala USA et al.*, No. 85-5-20 Cacv (Vt. Supr. Ct. 2024).

As discussed, you could also consider contacting the [Department of Public Safety](#) (they also have a searchable database) and the [Department for Children and Families](#).

Feel free to reach out if you have further questions.

Be well,  
Todd

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