

From: Mishaan, Jessica
To: tnuovo@vtlawoffices.com
Subject: public records request response
Date: Wednesday, December 11, 2024 10:40:43 AM
Attachments: [2024-12-11 Daloz ltr to Nuovo PRR \(Shambala\).pdf](#)
[image001.png](#)

Attorney Nuovo,

Please find the attached correspondence from Todd Daloz, AAG.

Thank you,

Jessica Mishaan | Paralegal
Office of the Attorney General | Appellate Unit
109 State Street, 3rd Floor
Montpelier, VT 05609-1001
(802) 828-5500 jessica.mishaan@vermont.gov





STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001

December 11, 2024

Thomas Nuovo, Esq.
Bauer Gravel Farnham, LLP
401 Water Tower Circle, Suite 101
Colchester, Vermont. 05446

Via email to: tnuovo@vtlawoffices.com

Re: Public Records Request

Dear Tom:

I write in response to your Public Records Act request received by the Attorney General's Office on Tuesday, November 26, 2024. Following our conversation on December 4th, you revised your initial request, per 1 V.S.A. § 318(d), as follows:

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).

Following a search, we have determined that the Attorney General's Office has no records that are responsive to your request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd W. Daloz", enclosed in a blue oval.

Todd W. Daloz, AAG