

Joshua Diamond, Deputy Vermont Attorney General
Zachary Chen, Assistant Vermont Attorney General
Office of the Vermont Attorney General
109 State Street
Montpelier, VT 05609-1001

June 28, 2017

Dear Zachary Chen and Josh Diamond:

Eighteen business days have passed since June 2, 2017, when we sent our response re: the Diaz case. We dropped off a check for \$327.75 that day.

While we appreciate your letter of June 18, 2017, and the release of the Mooney audit, our request for other documents has not been fulfilled. We first submitted a request for all records in the Diaz case on February 19, 2017.

We are waiting for the following records specified in the April 20, 2017, letter from Deputy Attorney General Josh Diamond:

2. The Northrup deposition.
3. Reports from Gosselin, Clarke, Bottino, Howell, Letourneau, Palmer and Chapman.
4. Twenty-five pages reflecting wire transfers and wiring instructions pertaining to Ms. Diaz's personal financial accounts regarding the foreign banks the VAG identified.
6. Court letters from Mr. Northrup.
15. Correspondence with employees from the state Auditor's office.
16. Correspondence with Sullivan and Powers to the state Auditor's office and correspondence from the Vermont NEA.
18. Discovery correspondence and materials between the AGO and opposing counsel. Re: the 1,168 pages of financial documents. For now, we agree to narrow the request to bank statements and wire transfer records. Please provide us with the 585 remaining pages of records. The VAG says the discovery correspondence documents are "likely" to be exempted. We need to know whether they are exempted or not.

In general, we were told that certain redacted pages would be simply eliminated. Please provide us with redacted pages even if they happen to be blank.

Thank you for your assistance.

Anne Galloway and Dan Schwartz