

SHAHEEN & GORDON, P.A.

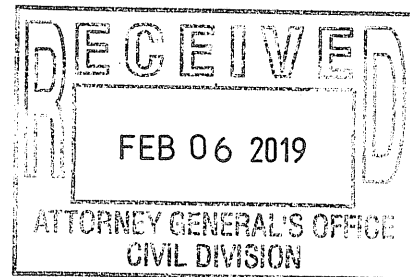
A T T O R N E Y S A T L A W

Tenacity. Creativity. Results.™

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February 4, 2019



Vermont Attorney General's Office •
109 State Street
Montpelier, VT 05609

Our Client: Jane Doe and her child – kidnapped at Mall of New Hampshire
Date of Incident: January 5, 2019

Dear Record Custodian:

Pursuant to Vermont's Public Records Act, 1 V.S.A. 315-320, I hereby request copies of the following records:

1. Any and all documents concerning and/or relating to Vermont's internal investigation into its response, or lack thereof, to Everett Simpson's escape from Valley Vista on January 4, 2019 and its failure to prevent the ensuing kidnapping and sexual assault;
2. Any and all documents concerning, relating to, and/or supporting Vermont's admission on January 8, 2019 that, in part: "The Vermont State Police has determined that there were additional steps that should have been taken..."
3. Any and all documents that refer or relate to the complete timeline of events between: 1) December 28, 2018 when Mr. Simpson's attorney first files a motion to have him transferred to Valley Vista; through 2) January 6, 2019 when Mr. Simpson was arrested in Pennsylvania;
4. Recording of the call from January 4, 2019 when Valley Vista informed Vermont State Police that Mr. Simpson had escaped;

5. The following email that Vermont identified in its timeline of events: 12:56 a.m. Saturday, Jan 5: Before going off duty, the trooper sends an email to other troopers in the barracks to update them about Simpson;
6. Any and all other written correspondence, including text messages and emails, that in any way refers or relates to the subject incident;
7. All correspondence, including text messages and emails, sent or received by and/or between any Vermont State employees regarding the subject incident.
8. Any and all surveillance footage of Everett Simpson, including his escape from Valley Vista;
9. Any and all emergency calls regarding the subject incident, including the multiple emergency calls the Thetford Police Department received on or around 3:46 p.m. on January 5, 2019 that a woman was in a car screaming for help and trying to exit the car while it was still moving;
10. Any and all documents concerning, relating to, and/or supporting Vermont's decision to quickly place Trooper Brennan back on duty on January 15, 2019;
11. The personnel files of Trooper Brennan and any other State employees who played a role in failing to prevent Mr. Simpson from terrorizing two innocent victims;
12. Any and all documents that refer or relate to any disciplinary action Vermont has initiated against any State employees regarding the subject incident.
13. Any and all documents that refer or relate to any changes that Vermont has made as a result of the subject incident, e.g. any new or different policies and procedures.

I am addressing this request to you in the belief that you are the custodian of such documents. If you are not, I request that you forward my request to the proper custodian of such documents and inform me of who that person is.

I hereby agree to pay reasonable and customary costs for these copies upon delivery, provided that the total does not exceed \$1,000.00. If the charge would exceed that amount, please so inform me before incurring the expense.

If the law does not allow me to have access to some of these records, please inform me within three business days, as provided by law, and inform me of the specific exemption that applies to each record or portion of a record being withheld. If an otherwise public record has a portion that is exempt from disclosure, please redact the exempt portion and release a copy of the rest of the document together with a notation of the specific exemption that applies to the redacted portion.

If some or all of my request is denied, please tell me the title and name of the person responsible for the denial and, as the law requires, please inform me of the appeal procedures available to me and the name of the person to whom an appeal may be made.

If you have questions about this request, please do so in writing via mail or e-mail. Thank you for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Michael Noonan", with a long horizontal flourish extending to the right.

D. Michael Noonan

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Anthony M. Carr

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cc: client