

**From:** [Brian Hanlin](#)  
**To:** [AGO - Info](#)  
**Subject:** Vermont Public Records Act request  
**Date:** Wednesday, May 8, 2019 3:32:01 PM  
**Attachments:** [5.8.19 VT req. BH2.pdf](#)

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To whom it may concern:

Please find the attached request pursuant to the Vermont Public Records Act. If you have any question, please let me know.

Thank you,



**Brian J. Hanlin**

Attorney

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Brian Hanlin  
hanlinb@fdazar.com  
303.757.3300 ext. 1116

May 8, 2019

Sent via E-Mail ago.info@vermont.gov

Vermont Office of the Attorney General  
Attn: Public Records Act Request  
109 State Street  
Montpelier, VT 05609

Re: Request Pursuant to the Vermont Public Records Act (“VPRA”)  
Concerning *Herrera, et. al. v. Wells Fargo Bank, N.A. D/B/A/ Wells Fargo Dealer Services, Inc., et al.*, case no. 8:18-cv-00332

To whom it may concern:

I am writing to request that a copy of the following documents (or documents containing the following information) be provided to me, in Adobe “.pdf” format, pursuant to the VPRA, Vt. Stat. tit. 1, sections 315-20:

1. All documents provided to the Vermont Office of the Attorney General by Wells Fargo Bank, N.A. and/or Wells Fargo Dealer Services (hereinafter “Wells Fargo”) regarding the December 28, 2018, settlement between the Vermont Office of the Attorney General and Wells Fargo related to Wells Fargo’s Guaranteed Automobile Protection policies (also referred to as Guaranteed Asset Protection or GAP);
2. All documents provided to the Vermont Office of the Attorney by Wells Fargo regarding its Guaranteed Automobile Protection policies (also referred to as Guaranteed Asset Protection or GAP);
3. Written correspondence between the staff of the Vermont Office of the Attorney General and Wells Fargo, or any legal representative of Wells Fargo (including its outside counsel) involving the Vermont Office of the Attorney General’s investigation into Wells Fargo’s Guaranteed Automobile Protection policies (also referred to as Guaranteed Asset Protection or GAP);
4. Presentations presented to or by the Vermont Office of the Attorney General during meetings with Wells Fargo and/or its legal representatives related to the Vermont Office of the Attorney General’s investigation into Wells Fargo’s Guaranteed Automobile Protection policies (also referred to as Guaranteed Asset Protection or GAP); and

5. A copy of the entire record of any investigation files at the Vermont Office of the Attorney General involving Wells Fargo's Guaranteed Automobile Protection policies (also referred to as Guaranteed Asset Protection or GAP).

The relevant period of time for Items 1 through 5 is receipt by the Vermont Office of the Attorney General between January 1, 2017 and December 28, 2018, regardless of their date of creation. This request includes responsive documents that were dated, created or generated during this time period.

If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

If any part or all of the materials are withheld under a VPRO exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemptions that form the basis for any deletion from a document or the complete withholding of a document.

I am willing to pay fees for this request up to a maximum of \$5,000. If you estimate that the fees will exceed this limit, please inform me first.

As provided for by Vt. Stat. tit. 1, section 318, please provide your reply within three (3) working days. Please expedite processing of this request as the documents are relevant to the claims and defenses asserted in *Herrera, et. al. v. Wells Fargo Bank, N.A. D/B/A/ Wells Fargo Dealer Services, Inc., et al.*, case no. 8:18-cv-00332, a class action currently pending before the Honorable Andrew J. Guilford. Thank you for your prompt attention to this matter.

You may reach me at 303.757.3300, Ext. 1116, between the hours of 8:00 a.m. and 6:00 p.m. MST, if necessary, to discuss any aspect of my request.

I appreciate your prompt consideration of this request.

Sincerely,

/s/ Brian J. Hanlin

Brian J. Hanlin  
FRANKLIN D. AZAR & ASSOCIATES, P.C.