

From: [Office of the Vermont Attorney General](#)
To: [AGO - Public Records Requests](#)
Subject: Public Records Request Form Form submitted on Office of the Vermont Attorney General
Date: Wednesday, October 2, 2019 5:01:11 PM

Name	Adiel
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Please describe the records you are requesting and provide as much specificity as possible, including applicable date ranges.

Under the Vermont Public Records Law, §315 et seq., I am requesting a copy of the following records:

A copy of all consumer complaints submitted to the Attorney General's office from January 1, 2016 to the date this request is filled, concerning the following companies:

- CVS Caremark, CVS Specialty, Coram CVS (or any variations)
- Express Scripts (or any variations)
- OptumRX (or any variations)

Please fill this request electronically, by e-mail attachment if available or CD-ROM/flash drive if not. I request that the information be delivered in its original format, or as text-readable pdfs.

I am not requesting private, personally identifiable information, like social security numbers/insurance account numbers/or other information protected by HIPAA, and consent to redaction of that information from this request.

I request that you waive any processing fees. I am a member of the news media requesting these records for newsgathering, not for commercial usage. In the event there are fees to produce this data, please contact me before fulfilling this request if the fee is above \$10. Also please contact me if you have any questions or need clarification regarding this request.

If you deny any other part of this request, please state the specific statute you believe exempts the information from disclosure. If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions under the law. I will also expect you to release all segregable portions of otherwise exempt material. I reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

If you have any questions, please contact me at adiel.kaplan@nbcuni.com or

646-689-3946.

Thank you in advance for your anticipated cooperation in this matter. I request you response within within 2 days, or within 10 days for extraordinary circumstances, as the statute requires. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect copies or the ability to inspect the requested records.

Sincerely,
Adiel Kaplan

Please take note of the following disclaimer:	<ol style="list-style-type: none">1. This public records request, including any associated correspondence, will be considered a public record in its entirety. As such, it will be made available to any member of the public upon request.2. Do not include any sensitive information, such as medical information, financial account numbers, or Social Security numbers. The AGO will contact you if additional information is required.3. Submission of this form does not constitute receipt of it by the AGO. Your public records request will be considered received on the next business day following its submission.
Agreement	I agree that I have read the directions and disclaimers on this form and that the information that I have provided is accurate to the best of my knowledge. Clicking the Declaration below is equivalent to my electronic signature.
Declaration (Required)	Declaration (Required)
Date Submitted	October 2, 2019
