

From: [Boyce, Bonnie](#)
To: ecorwin@vpr.net
Subject: 2019-10-16 Monde Cost Estimate to Corwin.pdf
Date: Wednesday, October 16, 2019 1:28:17 PM
Attachments: [2019-10-16 Monde Cost Estimate to Corwin.pdf](#)

Hi Ms. Corwin,

Attached is the revised cost estimate from Steve Monde.

Thank you.
Bonnie

Bonnie Boyce
Paralegal
Medicaid Fraud and Residential Abuse Unit
Office of the Attorney General
109 State Street
Montpelier, VT 05609-1001
(802) 828-5511
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109 STATE STREET
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October 16, 2019

Ms. Emily Corwin
Vermont Public Radio
365 Troy Avenue
Colchester, VT 05446
ecorwin@vpr.net

Re: Public Records Request re M. Kelly and W. Dubuque

Dear Ms. Corwin:

The Office of the Attorney General has completed its initial review of your public records act requests. We have prepared an index for each of your requests (attached to this letter), indicating whether there are responsive documents and documents that the AGO considers exempt from inspection or copying.

With respect to the latter, Assistant Attorneys General Molly R. Gray (Dubuque) and Steven Monde (Kelly) are responsible for the denials of your requests. Pursuant to 1 V.S.A. § 318(c)(1) the denials may be appealed to Deputy Attorney General Joshua Diamond, AGO, 109 State Street, Montpelier, VT 05609.

Documents that we have identified as responsive will need to be reviewed and redacted to safeguard potentially privileged or confidential information. The estimated cost of that review, redaction and production is:

M. Kelly Documents

1. Attorney review of electronic records 60 minutes @ \$.57/minute = \$34.20
2. Admin redaction of electronic records 30 minutes @ \$.45/minute = \$13.50

Total: \$47.70

W. Dubuque Documents

1. Attorney review of electronic records 110 minutes @ \$.57/minute = \$ 62.70

2. Admin redaction of electronic records 330 minutes @ \$.45/minute = \$148.50

Total: \$211.20

(See "Uniform Schedule of Public Records Charges for State Agencies, Vermont Secretary of State," available at <https://www.sec.state.vt.us/archives-records/certifications-fees/uniform-fee-schedule.aspx>)

We ask that you confirm your willingness to pay the above costs before we proceed further with processing your request. If the actual cost to respond to your request is less than that estimated, the difference will be refunded to you.

Please call if you have any questions.

Sincerely,



Steven Monde

Assistant Attorney General

Medicaid Fraud and Residential Abuse Unit

802-828-5518

Steven.Monde@Vermont.gov

Emily Corwin Public Records Request

Index – Re Marilyn Francis Kelly

There are no documents responsive to Request No. 1 (All case indexes and tables of contents).

The Office of the Attorney General considers the following documents, responsive to Requests Nos. 3 & 4, exempt from disclosure under the Attorney Work Product Doctrine as provided in 1 V.S.A. § 317(c)(4):

1. Initial Intake Form (1 page)
2. Closing Memorandum (2 pages)

Total pages: 3

The following documents, responsive to Requests Nos. 2 & 5, are potentially available for production following review and redaction of privileged or confidential information:

1. Handwritten Notes about Marilyn – (4 pages)
2. Timeline Narrative – (14 pages)

Total pages: 18

Index – In Re William Dubuque

The following communications are exempt from disclosure under the Vermont Public Records Act. Pursuant to 1 V.S.A. § 317(c)(3) disclosure of the following documents could violate duly adopted Vermont Rules of Professional Conduct.

1. Levine Email – July 13, 2015 – “APS case file 3739 – Attorney Work Product (1 page)
2. Levine Email – July 10, 2015 – “Dubuque Review” – Attorney Work Product (1 page)
3. Attorney Notes and post it – June 26, 2015 – Attorney Work Product (6 pages)

Total pages: 8

The following communications and images are potentially available for production:

3. Scene Photos – (18 photos)
4. Final Report of Autopsy – (3 pages)
5. Case Opening/Closing Form – (1 page)
6. Memorandum – Declination (1 page)
7. Incident Report – February 21, 2014 (5 pages)
8. Levine Email – June 16, 2015 – “Dubuque Case Review” – (4 pages)
9. Levine Email – June 17, 2015 – “Dubuque Case Review” – (3 pages)
10. Levine Email – May 25, 2015 – “Dubuque Case Review” – (1 page)
11. Levine Email – May 13, 2015 – “Debuque Case – Poss. manslaughter/elderly abuse” –(4 pages)
12. Levine Email – April 13, 2015 – “Debuque Case – Poss. manslaughter/elderly abuse” – (2 pages)
13. Levine Email – April 8, 2015 – “Dubuque”— (2 pages)
14. Levine Email – March 12, 2015 – “Dubuque” – (2 pages)
15. Levine Email – July 13, 2015 and Attachments (Adult Protective Services (APS) Investigative Report and notes – (64 pages)

Total pages: 92

Total images: 18