

**From:** Clark, Charity <Charity.Clark@vermont.gov>  
**Sent:** Tuesday, November 19, 2019 2:06 PM  
**To:** John Klar <[REDACTED]>  
**Subject:** RE: Vermont Public Records Act request

Aha. I don't believe those would be considered public records under the Act, so they wouldn't be included. Stay tuned for the cost estimate!

Charity

**From:** John Klar <[REDACTED]>  
**Sent:** Tuesday, November 19, 2019 1:33 PM  
**To:** Clark, Charity <[Charity.Clark@vermont.gov](mailto:Charity.Clark@vermont.gov)>  
**Subject:** Re: Vermont Public Records Act request

Yes, I meant personal correspondence of public employees.  
Thanks!

John

On Tue, Nov 19, 2019 at 1:31 PM Clark, Charity <[Charity.Clark@vermont.gov](mailto:Charity.Clark@vermont.gov)> wrote:

Dear Mr. Klar,

I understand from your email that you would like us to prepare a cost estimate for your request as originally drafted with one change: promotional or mass-mailed materials are excluded from your request. You had also mentioned emails with "private employees," but we only have public employees, so I don't think that would change your request.

We will now proceed with preparing a cost estimate.

Thank you,

Charity

**From:** John Klar <[REDACTED]>  
**Sent:** Tuesday, November 19, 2019 1:06 PM  
**To:** Clark, Charity <[Charity.Clark@vermont.gov](mailto:Charity.Clark@vermont.gov)>  
**Subject:** Re: Vermont Public Records Act request

I would not have thought that there were such huge volumes of correspondence between Planned Parenthood and the AG's office that my request would be overbroad. I'm also not sure how to narrow the request without potentially excluding important material. Are there materials you suggest would be trivial or unimportant that could be removed from the scope of my request? For instance, are there emails between private employees and PP related to contributing to Planned Parenthood? -- those would not concern me, and I would happily remove them (or other promotional, or mass-mailed, material) from the scope of the request.

As to my language -- I am requesting everything, even the proverbial kitchen sinks, so that there is no pretense to withhold cogent documentation. I seek anything relating to strategy, funding (including set-asides), substantive legislative content, or any other official or unofficial communications between the Vermont Attorney General's office and Planned Parenthood or its agents or affiliates. If that constitutes a large volume of material, then indeed I request a cost estimate, so that I may procure the funds.

Thanks,

John Klar

On Tue, Nov 19, 2019 at 12:43 PM Clark, Charity <[Charity.Clark@vermont.gov](mailto:Charity.Clark@vermont.gov)> wrote:

Dear Mr. Klar,

Your Public Records Act request, received by the Attorney General's Office (AGO) on November 18<sup>th</sup>, has been referred to me. As I understand your request, the scope is sufficiently broad that I assume it will cost more than \$10 to comply with your request. Before we proceeded with a cost estimate, I thought I would reach out to see if you wished to refine the scope in order to reduce costs.

Regarding the first part of your request (communications with Planned Parenthood), if you could be more specific with regards to the actual employees or positions at the Attorney General's Office whose communications you seek, that would help reduce the cost. Also, you say you would like copies of public records that "relate to" communications. Do you mean that you would like copies of communications, i.e., you would like us to search e-mails, correspondence via U.S. mail and the like? Also, when you say

“emails, documents, memoranda, notes, files or other data related [to the communications],” do you mean attachments to the communications requested? Or are you looking for something else?

The second part of your request (internal communications and documents related to Planned Parenthood) is also broad. By narrowing the scope, such as by type of document or by specific employee, you could reduce costs.

If you wish us to proceed with preparing a cost estimate based on your original request, just let me know. If you prefer to narrow the scope, please feel free to email me articulating the revised scope or give me a call to talk through some options. I will wait to hear from you before we proceed with the cost estimate.

Thank you,

Charity

Charity R. Clark

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Office of the Attorney General

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