

From: [Clark Charity](#)
To: [Jeremy Borden](#)
Subject: Vermont Public Records Request, dated 4/22/20
Date: Thursday, April 23, 2020 9:18:29 AM

Hi, Jeremy,

I hope you are doing ok during this crisis. We received your latest request for public records this morning, and I have a few questions (below). Also, due to the fact that our office is working remotely and balancing their work with home and parenting responsibilities during this crisis, we will need to assert our right to a 10-day extension to provide a response.

1. All communications between Apple representatives, lobbyists or any of its subsidiaries for the timeframe requested to and from the **attorney general, chief deputies and senior staff only**. Apple emails typically end in [@apple.com](#), [@apple-inc.com](#) and/or [@email.apple.com](#). All reasonable search methods to provide communications from other or private addresses or other means – text message or otherwise – should also be employed only as it relates to communications between Apple and its representatives.

Regarding text messages, please provide a list of the individuals you have in mind. Also, please specify the type of communication you mean when you refer to “other means” and “otherwise.” If you do not specify, we will move ahead with texts with whatever individuals you name and emails with the endings you specify.

Who do you mean by “attorney general, chief deputies and senior staff?” The most senior staff in our office would include: Attorney General, Deputy Attorney General, Chief of Staff, and Chief Assistant Attorney General. Do you wish to also include the Attorney General’s scheduler? Do you wish to include the Assistant Director of Internal and External Communications?

2. All communications with Apple **lobbyists Fred Zeytoonjian, John Hollar, Rebecca Lewandowski, Lucie Garand, Patricia Komline, Gabrielle Malina, Andrew Brewer** for the timeframe requested;

Do you wish to receive records of all communications with these individuals, or only communications related to Apple? Do you wish to receive such communications between these listed lobbyists and any person at the Attorney General’s Office or only between these lobbyists and the staff you list above in No. 1?

3. All contracts, Memorandums of Understanding and bid proposals retained by the above-named agency or any informal responses to contracted Requests for Proposal from Apple Inc. or any of its subsidiaries;

I assume by “above-named agency” you mean the Vermont Attorney General’s Office, but let me know if you were thinking of something broader. Regarding “subsidiaries,” please list the

companies you mean.

- 4) All calendars from the **attorney general, chief deputies and senior staff only** where the subjects of tech companies or Apple-related subjects were discussed. I ask that calendars where these meetings are mentioned be produced in their entirety and that this office narrowly construe any allowed exemptions in the state records' statute.

Regarding "attorney general, chief deputies and senior staff," I have the same question as in No. 1 above. Also, please let me know which "tech companies" you are referring to. Finally, by "Apple-related subjects," please let me know if you mean something other than "Apple."

Thank you.
Charity

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