

From: Clark, Charity <Charity.Clark@vermont.gov>
Sent: Wednesday, June 17, 2020 5:52 PM
To: John Klar <[REDACTED]>
Subject: RE: Responses to public records request, dated November 18, 2019, Tranche 1

Hi, John,

The 21 documents withheld have to do with lawsuits we are involved with. All the documents are emails about these lawsuits and, in some instances, include email attachments.

Unfortunately, I can't say for sure when the other documents will be gathered and ready for production. However, I am hopeful to have another tranche of documents ready in a couple of weeks, at the latest.

Sincerely,
Charity

From: John Klar <[REDACTED]>
Sent: Wednesday, June 17, 2020 4:22 PM
To: Clark, Charity <Charity.Clark@vermont.gov>
Subject: Re: Responses to public records request, dated November 18, 2019, Tranche 1

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Thank you, Charity.

When do you anticipate the next tranche will be available?

And, what was in the 21 withheld documents, so I can craft a basis to claim they were improperly withheld? (You know... just a hint? or maybe a metaphorical summary? :))

John

On Wed, Jun 17, 2020 at 3:16 PM Clark, Charity <Charity.Clark@vermont.gov> wrote:

Please see attached.

Charity R. Clark

Chief of Staff

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109 State Street

Montpelier, Vermont 05609

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STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001

June 17, 2020

via email to [REDACTED]

John Klar

[REDACTED]
Brookfield, VT 05036

Re: Responses to Vermont Public Records Act request, dated November 18, 2019, Tranche 1

Dear Mr. Klar:

The first tranche of records responsive to your Vermont Public Records Act ("PRA") request dated November 18, 2019, later revised to encompass records during the period May 1, 2018 to May 10, 2019, is now available. Your request asked for the following records:

"[C]opies of public records that relate to communications between Attorney General TJ Donovan, (the Vermont Office of the Attorney General (VOAG), its employees or agents) and Planned Parenthood, or any organizations, superpacs, agents, representatives or employees thereof, and emails, documents, memoranda, notes, files or other data related thereto. Also requested are any and all internal VOAG or state interagency emails, documents, memoranda, notes, files or other data related to Planned Parenthood or its agents, representatives, employees or related entities, particularly but not limited to any communications of any kind related to Act 57 or Proposal 5."

Due to the size of the file, we have uploaded the documents to our website in two parts. Part 1 can be found [here](#) and Part 2 [here](#). For future reference, all requests for public records and responsive records can be found by year and requester name under the "Open Government" tab of our website [here](#).

In this tranche, 21 documents were withheld for being exempt from the PRA under 1 V.S.A. §§ 317(c)(3) and 317(c)(4). If you believe any document has been withheld in error, you may appeal to:

Joshua Diamond, Deputy Attorney General
Vermont Attorney General's Office
109 State Street
Montpelier, Vermont 05609

Once we have collected an additional group of documents, I will send the second tranche of responsive records.

Sincerely yours,

/s/ _____
Charity R. Clark