

From: [Laurie S. Noyes](#)
To: [AGO - Info](#)
Cc: [Kristina R. Brines](#)
Subject: Public Records Request to VT AGO, Civil Rights Unit; [REDACTED]
Date: Wednesday, January 6, 2021 8:19:47 AM
Attachments: [2021-01-06 Public Records Request to VT AGO.PDF](#)

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Please see attached public records request regarding the matter of [REDACTED]

[REDACTED]. Thank you.

Laurie S. Noyes

Senior Paralegal

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LAURIE S. NOYES
lnoyes@pfclaw.com

January 6, 2021

VIA EMAIL ONLY – ago.info@vermont.gov

Attorney General T.J. Donovan Jr.
Vermont Attorney General
109 State Street
Montpelier, VT 05609-1001

Re: [REDACTED]

Dear Attorney General Donovan:

Please consider this to be a request for public records pursuant to the Vermont Public Records Act, 1 V.S.A. § 315 et seq.

This office represents [REDACTED] in connection with a civil action brought by [REDACTED] in the Windsor Civil Division of the Vermont Superior Court, Docket No. [REDACTED]. This civil suit arises from events originally alleged to have formed the basis of a Complaint to the Vermont Attorney General's Office, Civil Rights Unit, filed by [REDACTED] on January 30, 2019.

Pursuant to the Vermont Public Records Act and and/or Section 83 of the EEOC Compliance Manual, we hereby request a copy of all information and documents, both electronic and hard copy, contained in your files related to any allegations filed by [REDACTED] related to [REDACTED] employment with [REDACTED] during the period January 1, 2016 through December 31, 2020, including your complete investigation file related to any such claims made by [REDACTED]. In your response to this request, please list the documents, if any, that are withheld from the files under any exemption(s), with the relevant exemption(s) specified.

We wish to obtain the requested information as soon as possible because we are actively engaged in litigation with respect to this matter. Accordingly, we would appreciate your emailing us a complete copy of the files upon receipt of this letter. Please include a bill for costs, which will be paid upon receipt.

January 6, 2021

Page 2

Thank you for your consideration of this request. Please do not hesitate to call me if you have any questions.

Sincerely,

PAUL FRANK + COLLINS P.C.

A handwritten signature in black ink that reads "Laurie S. Noyes". The signature is written in a cursive, flowing style.

Laurie S. Noyes
Senior Paralegal