

From: Renner, Jamie <Jamie.Renner@vermont.gov>
Sent: Thursday, March 17, 2022 12:55 PM
To: Anthony Carr <acarr@Shaheengordon.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>
Subject: RE: Your Public Records Act Request

Attorney Carr:

By way of follow up to my letter of March 8, please see the attached letter.

Regards,
Jamie

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March 17, 2022

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By e-mail to: acarr@shaheengordon.com

Re: Vermont Public Records Act Request

Dear Mr. Carr:

On March 3rd, 2022, you submitted a Public Records Act (PRA) Request to my Office seeking “[any and all documents referring or relating to Woodbine Senior Living, LLC and/or Spring Village at Essex, including but not limited to all documents relating to allegations of their violations of Vermont’s Consumer Protection Act and the Assurance of Discontinuance, as well as all communications.” On March 8th, I replied invoking my Office’s right to an additional ten (10) business days to respond to your request. I write to provide that initial response.

Namely, I write to provide a cost estimate for your request (if fulfilled as is), and to schedule a time next week to continue discussing the potential narrowing of your request. As to the cost estimate: my Office is entitled to charge a requester for the “staff time associated with complying with the request.” 1 V.S.A. § 316(c). The first 30 minutes of staff time is free. *Id.* Beyond 30 minutes, we follow the Secretary of State’s (SOS) [Uniform Charges Schedule](#), available on the SOS’s website. In short, for an attorney’s time spent fulfilling your request, we charge \$0.57/minute; for other staff time we charge \$0.45/minute, except when the time spent is photocopying pages. In the latter case, we charge \$0.33/minute. If hard copies are requested, the Uniform Charges Schedule provides for those costs, as well.

We estimate that your request could require approximately 20 hours of attorney time and 16 hours of paralegal time to collect and review the requested records, analyze the applicability of PRA exemptions to them individually, perform necessary redactions, and prepare the records for production—approximately \$1,116.

Given that many of the requested documents are likely not disclosable in light of PRA Exemptions (1 V.S.A. § 317), and—per our last conversation—given that some of the potentially responsive documents might not be of interest to you, I wanted to ask whether you were interested to set a time next week to continue discussing what categories of potentially responsive documents you would want us to produce.

Please let me know how you would like to proceed.

Regards,

Jamie Renner
Assistant Attorney General
802-828-5947