

From: Curtis, Christopher
Sent: Monday, November 7, 2022 12:27 PM
To: tejada.lindsay@gmail.com
Subject: Re: Your Public Records Request

Dear Ms. Tejada,

Attached please find a response to your public records request. Thank you.

Best, Christopher

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-279-5496

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November 7, 2022

Ms. Lindsay Tejada
tejada.lindsay@gmail.com
BY ELECTRONIC DELIVERY

Dear Ms. Tejada,

Thank you for your public records request dated September 9, 2022 and for the extension of time to fully consider it. You requested “any and all documents, records, and agreements relating to the settlement with JUUL Labs referenced above; in particular terms of the escrow account arrangements, escrow agreement, distribution plans, trust account agreements, settlement agreement, settlement term page, or the like.”

Please be advised that with respect to the requested items the documents potentially responsive to your request are withheld as exempt from disclosure. These potentially responsive records are exempt from disclosure pursuant to 1 V.S.A. §§ 317(c)(1), (2), (3), (4) (confidential records; records that may only be disclosed to specifically designated persons; records that would violate statutory or common law privilege; adopted standards or ethics of a regulated profession, attorney-client communications, attorney work product, and/or the common interest doctrine).

If you feel any information or records have been withheld in error, you may appeal to Deputy Attorney General Joshua Diamond at the following email address: Joshua.Diamond@vermont.gov.

Thank you for your consideration.

Sincerely,

/s/ Christopher J. Curtis
Christopher J. Curtis
Chief, Public Protection Division