

**From:** [Jim Gallagher](#)  
**To:** [AGO - Info](#)  
**Cc:** [Mishaan, Jessica](#); [Racht, Jody](#)  
**Subject:** Public information request regarding Claffey Day Care of St. Johnsbury [DRM-ID.FID1011380]  
**Date:** Wednesday, January 8, 2020 3:16:11 PM  
**Attachments:** [20200108151204905.pdf](#)

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

Ms. Mishaan,

Pursuant to my recent conversations with Jody Racht, I am forwarding a public records request regarding Claffey Day Care. I am also attaching a Consent for Release of Information signed by [REDACTED], parents of [REDACTED]. I thought I had previously sent this request to you, but just discovered that it had not gone out.

Please acknowledge receipt of this request so I can be sure I sent it to the right place. If you have any questions, you can reach me as indicated below.

Jim Gallagher

[James C. Gallagher](#) | Litigation Group  
**Downs Rachlin Martin PLLC | Business Sense - Legal Ingenuity**  
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**Public Document Request**

January 8, 2020

On behalf of our clients [REDACTED] and their daughter [REDACTED] of St. Johnsbury, Vermont, we request copies of the following documents relating to Sheila Claffey /dba Claffey Day Care of St. Johnsbury:

1. Sheila Claffey's original application to the State of Vermont for a license or registration certificate for Claffey Day Care, and all subsequent applications for renewal of her license or registration certificate.
2. All licenses or registration certificates granted to Sheila Claffey, with any attendant conditions or variances.
3. Any notice(s) of any complaints or violations of regulation provided by the state to Claffey Day Care during the period she held a license or registration certificate,
4. All correspondence regarding or documentation of any investigations done of Claffey Day Care by the state, whether the result of (1) an application for a license or registration certificate, or any renewal thereof, (2) a complaint made against the facility, (3) a routine visit to the facility or (4) for any other reason.
5. To the extent not provided in response to the preceding request, any documentation of any site visit or licensing visit made by the state of Claffey Day Care.
6. To the extent not covered in the preceding request, any reports prepared of any such visits or investigations.
7. Any instructions, recommendations, literature or other printed or digital material provided to Claffey Day Care, regarding recommended or approved training for staff with respect to protecting children from abuse.
8. Any documentation, in your possession, of training provided by Claffey Day Care to its staff regarding protection of children from abuse.
9. Any correspondence with or other notice to Claffey Day Care regarding any denial, suspension or revocation of its license.
10. Any parental notification letters sent to parents of Claffey Day Care enrolled children indicating that a staffing or serious health or safety violation had been identified.
11. Any authorization of a criminal records check of Thomas Claffey, signed by Thomas Claffey.
12. To the extent not covered by the preceding request, any Licensing Records Check Form submitted by Claffey Day Care for any and all staff, aides, substitutes and other persons who had contact with children, as required by Section II (D)(3) of the February 12, 2001 Family Child Care Licensing Regulations, from the time Claffey Day Care first applied for registration or for a license until it surrendered its license in 2017.
13. The results of any criminal records check done of Thomas Claffey.
14. Any record or other written material provided by Claffey Day Care with respect to Thomas Claffey, as a resident of the house in which Claffey Day Care was provided, or as a volunteer, assistant, substitute, aid or staff of Claffey Day Care.
15. Any record of the qualifications of Thomas Claffey or of the training provided to Thomas Claffey by Claffey Day Care. This should include, but not be limited to, any record of completion of the 30-hour course in child development topics and of each annual completion of 12 hours of

Professional Development Activities required by Section 11 (A)(3) of the February 12, 2001 Family Child Care Licensing Regulations (if Thomas Claffey was included in Claffey Day Care staff).

16. Any written assessment of Claffey Day Care, prepared by either Claffey Day Care or by the Child Development Division of the Department of Children & Families or its predecessors.

I attach a Consent for Release of Information signed by [REDACTED] and [REDACTED] parents to [REDACTED]

  
James C. Gallagher, Attorney for

[REDACTED]

CONSENT FOR RELEASE OF INFORMATION

We, [REDACTED] and [REDACTED], who reside at [REDACTED], Saint Johnsbury, Vermont 05819, on behalf of our minor daughter, [REDACTED], a minor child whose date of birth is [REDACTED] hereby grant and consent to the release of personal records and other information, including reports, medical reports and records, investigative reports, audio and/or video recordings and any other information in any way pertaining to our daughter, to the following attorneys:

Keith L Miller, Esq.  
58 Winter Street, 4<sup>th</sup> Floor  
Boston, MA 02108

James C. Gallagher, Esq.  
Downs, Rachlin, Martin, PLLC  
90 Prospect Street  
St. Johnsbury, VT 05819

This Consent, or any reproduction of this Consent, is intended to be provided to multiple holders of such records and is valid from the signature date listed below for a period not to exceed three (3) years from such date.

Signed as a sealed document on this 10 th day of December, 2019.

[REDACTED]