

From: [Jeremy Borden](#)
To: [AGO - Info](#)
Subject: Vermont AG Apple Inc. records request
Date: Wednesday, April 22, 2020 6:32:20 PM
Attachments: [4 22 20 VERMONT AG APPLE DOCS.docx](#)

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

Please see below and attached and thanks so much for your help!

April 22, 2020

Vermont Attorney General
C/O Records Custodians
ago.info@vermont.gov

Vermont Public Records Act: Apple Inc. communications and documents request

To Whom It May Concern:

This is a request under the **Vermont Public Records Act**. Per the statute, please provide responsive records within three business days.

If necessary, please forward to the correct records custodian.

Please search the timeframe of January 1, 2018 through present for this request.

Please provide the following as it relates to Apple Inc. or any of its subsidiaries.

Please provide the following under the open records statute:

- 1) All communications between Apple representatives, lobbyists or any of its subsidiaries for the timeframe requested to and from the **attorney general, chief deputies and senior staff only**. Apple emails typically end in [@apple.com](#), [@apple-inc.com](#) and/or [@email.apple.com](#). All reasonable search methods to provide communications from other or private addresses or other means – text message or otherwise – should also be employed only as it relates to communications between Apple and its representatives.
- 2) All communications with Apple **lobbyists Fred Zeytoonjian, John Hollar, Rebecca Lewandowski, Lucie Garand, Patricia Komline, Gabrielle Malina, Andrew Brewer** for the timeframe requested;
- 3) All contracts, Memorandums of Understanding and bid proposals retained by the above-named agency or any informal responses to contracted Requests for Proposal from Apple Inc. or any of its subsidiaries;
- 4) All calendars from the **attorney general, chief deputies and senior staff only** where the subjects of tech companies or Apple-related subjects were discussed. I ask that calendars where these meetings are mentioned be produced in their entirety and that this office narrowly construe any allowed exemptions in the state records' statute.

Please exclude all routine law enforcement requests involving Apple. Additionally, I am not seeking communications regarding employees' personal Apple accounts, automatic Apple

calendar or product-related notifications or press releases from Apple.

This office should undertake reasonable efforts to include any communications from Apple or its lobbyists or representatives that come from a private or other email addresses.

Please provide all records in a machine-readable format, including, whenever possible, having performed Optical Character Recognition (OCR) on .pdf files. Word or .doc and/or .docx files are acceptable. If applicable, spreadsheets, whenever possible, should be provided in .csv or .xlsx format.

I request all communications and responsive records regarding this request to be sent electronically to the email provided.

I preemptively agree to pay fees up to \$100 for the search and production of the above-described records and ask to be notified only if the estimated fees exceed that amount. Once records are compiled, please justify each deletion separately by reference to specific exemptions of the law and release all reasonably segregable portions of otherwise-exempt material.

I look forward to your response within the act's statutory time limit.

Thank you for your consideration of this request.

Sincerely,

Jeremy Borden

A large black rectangular redaction box covering the signature of Jeremy Borden.

Durham, NC
27701

Jeremy Borden



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