

From: Jeremy Borden <[REDACTED]>
Sent: Wednesday, April 29, 2020 9:56 AM
To: Clark, Charity <Charity.Clark@vermont.gov>
Subject: Re: Vermont Public Records Request, dated 4/22/20

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

Hi,

Hope you are staying safe and thanks so much for your work on this. My answers below in blue. Don't hesitate to reach out with any other questions. Thank you!

Best,

Jeremy

On Thu, Apr 23, 2020 at 9:18 AM Clark, Charity <Charity.Clark@vermont.gov> wrote:

Hi, Jeremy,

I hope you are doing ok during this crisis. We received your latest request for public records this morning, and I have a few questions (below). Also, due to the fact that our office is working remotely and balancing their work with home and parenting responsibilities during this crisis, we will need to assert our right to a 10-day extension to provide a response.

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.

Regarding text messages, please provide a list of the individuals you have in mind. Also, please specify the type of communication you mean when you refer to “other means” and “otherwise.” If you do not specify, we will move ahead with texts with whatever individuals you name and emails with the endings you specify.

Who do you mean by “attorney general, chief deputies and senior staff?” The most senior staff in our office would include: Attorney General, Deputy Attorney General, Chief of Staff, and Chief Assistant Attorney General. Do you wish to also include the Attorney General’s scheduler? Do you wish to include the Assistant Director of Internal and External Communications?

. RESPONSE: Emails and texts are great - please also include any internal or external messaging platforms (Slack, Teams, etc.). The list you have provided sounds good to search for responsive communications - AG, Deputy AGs, Chief of staff, Chief Assistant, AG scheduler, Communications director and assistant director.

2. All communications with Apple lobbyists **Fred Zeytoonjian, John Hollar, Rebecca Lewandowski, Lucie Garand, Patricia Komline, Gabrielle Malina, Andrew Brewer** for the timeframe requested;

Do you wish to receive records of all communications with these individuals, or only communications related to Apple? Do you wish to receive such communications between these listed lobbyists and any person at the Attorney General's Office or only between these lobbyists and the staff you list above in No. 1?

RESPONSE: Yes, all communication from these Apple lobbyists. regardless of any keywords mentioned. The search may be limited to the employee positions above (AG and senior staff as detailed).

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;

I assume by "above-named agency" you mean the Vermont Attorney General's Office, but let me know if you were thinking of something broader. Regarding "subsidiaries," please list the companies you mean.

RESPONSE: Yes as pertains to the Vermont AG's office. This includes anything retained by the AG's office, not just direct contracts with Apple. Apple Inc. only is OK.

- 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.

Regarding "attorney general, chief deputies and senior staff," I have the same question as in No. 1 above. Also, please let me know which "tech companies" you are referring to. Finally, by "Apple-related subjects," please let me know if you mean something other than "Apple."

RESPONSE: To clarify, all meetings (regardless of subject) with Apple Inc, or known tech-related lobbying organizations including but not limited to representatives of the Vermont Technology Alliance.

Thank you.

Charity

Charity R. Clark

Chief of Staff

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