



October 25, 2012

Governor Peter Shumlin  
State of Vermont  
Attn: Sarah London  
109 State Street  
Montpelier, VT 05609

**Re: Vermont Public Records Act Request for Information**

Dear Governor Shumlin:

Pursuant to Vermont's Access to Public Records Act, 1 V.S.A. §§ 315-320, for the calendar year 2011, I hereby request the following information regarding claims or allegations of discrimination, misconduct, wrongful discharge or sexual harassment involving any employee or official, elected or appointed, of the State of Vermont:

1. A copy of all checks (or other documents indicating any form of payment whatsoever) reflecting payment related to such claims or allegations, including but not limited to, any settlements or settlement payments;
2. All ledger entries or financial reports regarding such claims or allegations;
3. Any and all correspondence, emails, memoranda or documents of any kind related to such claims or allegations; and
4. Any and all documents related to such claims or allegations, whether or not monetary payments were made.

If any request (or any part of any of these requests) is denied, please list the specific criteria you are relying on for the denial, as well as the name and title of the person responsible for the denial.

Pursuant to the Public Records Act, please also comply with the following:

- Produce these documents promptly or certify within two (2) business days why you are denying me access to them or any particular documents. (This time limit may be extended only under certain conditions as outlined in 1 V.S.A. § 318);
- Treat each of the four (4) requests above as a separate request and produce the categories of documents on a rolling basis as they are gathered and do not refuse to promptly produce any compiled documents on the basis that the four (4) individual requests, as a group, would be a voluminous undertaking;

- If you believe an otherwise public record is exempt from disclosure, produce a log with the page numbers of the documents, date of the document, people or entities who received copies, authors of the document, and a specific explanation (citing to the applicable exemption) for why a document has not been produced;
- If an otherwise public record has a portion that is exempt from disclosure, redact any exempt portion and release the redacted document, together with a log, as described in the paragraph above;
- Inform me of the appeal procedures available to me should you withhold any documents;
- If you are unable to copy any material, identify the material and notify me when it will be available for my inspection; and
- Provide a written reply to this request.

In the event you refuse to produce any responsive records to me, it would be helpful to Bates Number any such documents for easy reference to avoid confusion in future proceedings regarding the failure to produce these records. Please note, effective July 31, 2012, in many cases a reviewing court is **required** to assess reasonable attorney fees and other litigation costs incurred in pursuing an Access to Public Records Act claim in which the complainant has substantially prevailed. *See*, 1 V.S.A. § 319(d)(1) (as amended).

I am willing to pay reasonable duplication fees if necessary. Please call me as soon as these documents are gathered so that I can arrange to have them picked-up. Thank you for your assistance with this matter. I look forward to your response. If you have any questions, please call me at 802-230-4450.

Sincerely,



Randy Brock

**RECEIVED ON October 25, 2010.**

**By:** \_\_\_\_\_