

**THOMAS J. DONOVAN, JR.**  
ATTORNEY GENERAL

**JOSHUA R. DIAMOND**  
DEPUTY ATTORNEY GENERAL

**WILLIAM E. GRIFFIN**  
CHIEF ASST. ATTORNEY  
GENERAL



**STATE OF VERMONT**  
**OFFICE OF THE ATTORNEY GENERAL**  
**109 STATE STREET**  
**MONTPELIER, VT**  
**05609-1001**

TEL: (802) 828-3171  
FAX: (802) 828-3187  
TTY: (802) 828-3665

<http://www.ago.vermont.gov>

May 12, 2017

Joseph M. Finnigan, Esq.  
Johnson and Finnigan, LLP  
80 Midas Dr.  
South Burlington, VT 05403

Re: Danial Emmons/Marcy Brigham/Rebel Alliance PAC  
Campaign Finance Law Complaint

Dear Attorney Finnigan:

I am writing to follow up on the recent telephone conversations between you and the Attorney General's Office regarding the above-referenced matter. As we noted, your clients filed inadequate and untimely campaign finance reports.

We understand that your clients have agreed to promptly file correctly amended campaign finance reports with the Secretary of State's Office. Further, you will provide the amended reports to us before you file them so that we can ensure their accuracy. If such amended reports are filed correctly, we will consider this matter closed.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Megan J. Shafritz".

Megan J. Shafritz  
Assistant Attorney General  
Chief, Civil Litigation Division

Cc: Paul Engels

AS 001

## *Deb Matthews*

Administrative Secretary

Office of the Attorney General | GCAL

109 State Street, 3rd Floor

Montpelier, VT 05609

Phone | 802-828-3689

E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto:████████████████████]

**Sent:** Wednesday, March 08, 2017 3:46 PM

**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>

**Subject:** Re: South Burlington PAC - Urgent

Hi again Deb,

Further to my point above about time sensitivity and expected influence during the upcoming second vote on the School Budget in SB, you can see from this Facebook public group conversation the intent to continue.

You might also want to look at the Facebook group of the Rebel

Alliance: <https://www.facebook.com/groups/sbrebelalliance/>

Again, they have every right to pursue their purpose, but as all others, must work within the rules. I do not think they are intentionally avoiding the rules, I simply believe they do not know them.

On Wed, Mar 8, 2017 at 3:09 PM, monica ostby <████████████████████> wrote:

Hello Deb,

Per our conversation, and per Jim Condos' advice to contact the Attorney General promptly, I am hoping to bring to the Attorney General's immediate attention a situation in South Burlington that has impacted and will soon work to impact again our local elections.

In the last few days Paul Engels forwarded a complaint to your office regarding a group called the Rebel Alliance. They are a group of concerned citizens from both inside of South Burlington and beyond who are unhappy with the recent decision by the School Board to retire the school nickname "Rebels." And they have every right to put their anger into action as they see fit.

That said, it is clear by the amount of promotional materials they have put forth that they have far exceeded the \$1000.00 level - thus they should have already registered to become a PAC and reported their expenditures.

They are under the impression that they do not need to be registered as a PAC, perhaps because much of their materials are in-kind (which they may not understand) and that no donations larger than \$1000.00 have been received. (I believe there is confusion in that the definition means all contributions (whether \$5 or \$1000) exceeding the \$1000.00 total requires their registration.

In yesterday's Town Meeting the SB School Budget was voted down, which was their advertised mission. In fact their Facebook group members have said such things as "continue to vote no on the school budget until the School Board reverses their decision to retire the rebel name."

Because the budget was voted down, the School Board need to present a second attempt within 30 days I believe to voters. The Rebel Alliance group will surely work to influence this election as well.

My complaint is not in any way to challenge their right to pursue their purpose. However, they need to do it in a transparent way and follow the rules of reporting as a PAC so voters can be aware of the level of influence before they step into the voting booth.

Please can you act quickly to pursue the complaint Paul Engles sent to you earlier. Because the next vote will be put in front of voters again very soon, it is not acceptable that the rules may continue to not be followed.

Thank you for your time.  
Monica Ostby, South Burlington



## *Deb Matthews*

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Office of the Attorney General | GCAL  
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E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

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**Sent:** Wednesday, March 08, 2017 3:46 PM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>  
**Subject:** Re: South Burlington PAC - Urgent

Hi again Deb,

Further to my point above about time sensitivity and expected influence during the upcoming second vote on the School Budget in SB, you can see from this Facebook public group conversation the intent to continue.

You might also want to look at the Facebook group of the Rebel Alliance: <https://www.facebook.com/groups/sb rebel alliance/>

Again, they have every right to pursue their purpose, but as all others, must work within the rules. I do not think they are intentionally avoiding the rules, I simply believe they do not know them.

On Wed, Mar 8, 2017 at 3:09 PM, monica ostby <[REDACTED]> wrote:

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Please can you act quickly to pursue the complaint Paul Engles sent to you earlier. Because the next vote will be put in front of voters again very soon, it is not acceptable that the rules may continue to not be followed.

Thank you for your time.

Monica Ostby, South Burlington  
[REDACTED]

SB VT Community Watch

**Abby Crocker** In the interests of moving forward together, I think it's fair to just ask that we all assume best intentions and are honest/respectful with each other. My question to Marcy and Dan about if their advocacy mission moving forward includes retaining the Rebel identifier as a core motivation is important, not because I am going to judge their answer - but rather because I want to know the honest answer so we know HOW we can all move forward together.

Specifically, on this page Marcy and Dan leave out the Rebel Identifier cause of their stated mission. However, in their postings on the Rebel Alliance page the Rebel Identifier is key to their mission (Marcy's post this morning post-election states "I'm looking forward to the next phase of our mission and approach to the school board over the Rebel name"). Which is it?  
 Like · Reply · 3 · 1 hr

**Marcy Edson Brigham Abby,** I respectfully disagree that the Rebel name is not a good unifier for South Burlington. This past month has shown me quite the opposite, furthering what I have experienced and felt over many years being involved with the schools and students. I stand by my statements that I want the Board to stand by the 2015 promise made, to represent the position of the people they were elected to represent, and to not spend tax payers' money against their will on a special matter. The budget is paramount, as we now know from yesterday's vote. That is certainly my first priority, but community morale is a close second, because one issue affects the other. I support democracy and believe in it being the best way to balance our government and society. That is why I continue to support the Rebel mission, because that is the will of the majority.  
 Like · Reply · 30 mins

**Abby Crocker** Thanks for clarifying!  
 Like · Reply · 28 mins

**Dan Emmons** Ok. Knocked that one out of the park. I have nothing to add. My sentiments exactly.  
 Like · Reply · 12 mins

CREATE NEW GROUPS  
 Groups make it easier than ever to share with friends, family and teammates.  
 Create a Group

RECENT GROUP PHOTOS  
 Set

SUGGESTED GROUPS  
 Set

**SOUTH BURLINGTON REBEL ALLIANCE**  
 Rebel Alliance  
 32 friends · 1,784 members  
 Join

Chat (37)

Deb Matthews  
Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

-----Original Message-----

From: Paul Engels [mailto:[\[REDACTED\]](mailto:)]  
Sent: Monday, March 06, 2017 8:19 AM  
To: AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>  
Subject: Update on Emmons, Brigham & the Rebel Alliance

Attorney General Donovan,

I have discovered in conversation with Dan Emmons and Marcy Brigham that they have charged about \$3000 on their credit cards to pay for their campaign expenses. They have not reported loaning themselves this money on their February campaign finance reports nor have they itemized their spending.

Dan claims they have cleared everything with JP Isabelle. I doubt JP would approve of them not reporting their loan and their expenses. We voters have a right to know what they are doing. That is the point of the reports.

They are also using the Rebel Alliance, an unregistered PAC, to fund raise through the Rebel Alliance facebook page to pay themselves back for their credit card loans.

These people and their money may have a profound effect on the South Burlington election tomorrow. If the School budget is voted down it will be because of them. The City Council and School Board elections will be affected. Is there anything you can do prior to the election?

Please confirm receipt of my complaint.

Paul Engels

Sent from my iPad



THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

JOSHUA R. DIAMOND  
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March 21, 2017

Monica Ostby  
11 Sandalwood Dr.  
South Burlington, VT 05403

Re: Campaign Finance Law Complaint

Dear Ms. Ostby:

I am writing to acknowledge receipt of your email dated March 9, 2017, in which you request that this Office investigate alleged violations of Vermont's campaign finance laws by the Marcy Brigham, Dan Emmons, and the Rebel Alliance.

This Office will be looking into your complaint to determine whether further action under 17 V.S.A. § 2904 is warranted. That provision of law provides the Attorney General with authority to investigate alleged violations and to take action when appropriate. I will contact you if we need additional information.

You will be notified when the review is complete. Please note, however, that § 2904 limits our ability to publicly disclose information obtained during the course of an investigation absent a court order or the consent of the person who provides the information.

Sincerely,

A handwritten signature in cursive script that reads "Eve Jacobs-Carnahan".

Eve Jacobs-Carnahan  
Assistant Attorney General

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STATE OF VERMONT  
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109 STATE STREET  
MONTPELIER, VT  
05609-1001

March 21, 2017

Paul Engels  
15 Orchard Rd.  
South Burlington, VT 05403

Re: Campaign Finance Law Complaint

Dear Mr. Engels:

I am writing to acknowledge receipt of your email dated March 2, 2017, in which you request that this Office investigate alleged violations of Vermont's campaign finance laws by the Marcy Brigham, Dan Emmons, and the Rebel Alliance.

This Office will be looking into your complaint to determine whether further action under 17 V.S.A. § 2904 is warranted. That provision of law provides the Attorney General with authority to investigate alleged violations and to take action when appropriate. I will contact you if we need additional information.

You will be notified when the review is complete. Please note, however, that § 2904 limits our ability to publicly disclose information obtained during the course of an investigation absent a court order or the consent of the person who provides the information.

Sincerely,

A handwritten signature in cursive script that reads "Eve Jacobs-Carnahan".

Eve Jacobs-Carnahan  
Assistant Attorney General

London, Sarah

---

**From:** Jacobs-Carnahan, Eve  
**Sent:** Wednesday, March 22, 2017 11:18 AM  
**To:** monicaostby [REDACTED]  
**Subject:** Emmons and Brigham campaign finance complaint  
**Attachments:** 2017-03-21 Ltr to Ostby.pdf

Dear Ms. Ostby,

With regard to your inquiry this morning, I attach a copy of a letter that I mailed to you yesterday. As you can see, we are investigating this campaign finance complaint. We will notify you when the matter has concluded. The statute, 17 V.S.A. § 2904, does not permit us to share the investigatory materials with you.

***Eve Jacobs-Carnahan***

Assistant Attorney General  
Vermont Attorney General's Office | Civil Litigation Division  
109 State Street, Montpelier, VT 05609-1001  
(802) 828-0370 | eve.jacobs-carnahan@vermont.gov

**From:** monica ostby [mailto:[REDACTED]]  
**Sent:** Wednesday, March 22, 2017 8:21 AM  
**To:** AGO - Info <AGO.Info@vermont.gov>  
**Cc:** Paul Engels <[REDACTED]>  
**Subject:** Re: South Burlington PAC - Urgent

Deb, further to my question about what's been communicated, here is the conversation happening on the Rebel Alliance wall: <https://www.facebook.com/groups/sb rebel alliance/permalink/251110442017334/>

On Wed, Mar 22, 2017 at 8:17 AM, monica ostby <[REDACTED]> wrote:

Hello Deb,  
I'm seeing my name being called out on the Rebel Alliance Facebook wall. Can you tell me what the status is of the investigation? I'd like to know what information he has so I can defend my character.  
Thank you.  
Monica

On Wed, Mar 8, 2017 at 3:09 PM, monica ostby <[REDACTED]> wrote:

Hello Deb,  
Per our conversation, and per Jim Condos' advice to contact the Attorney General promptly, I am hoping to bring to the Attorney General's immediate attention a situation in South Burlington that has impacted and will soon work to impact again our local elections.

In the last few days Paul Engels forwarded a complaint to your office regarding a group called the Rebel Alliance. They are a group of concerned citizens from both inside of South Burlington and beyond who are

unhappy with the recent decision by the School Board to retire the school nickname "Rebels." And they have every right to put their anger into action as they see fit.

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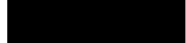
In yesterday's Town Meeting the SB School Budget was voted down, which was their advertised mission. In fact their Facebook group members have said such things as "continue to vote no on the school budget until the School Board reverses their decision to retire the rebel name."

Because the budget was voted down, the School Board need to present a second attempt within 30 days I believe to voters. The Rebel Alliance group will surely work to influence this election as well.

My complaint is not in any way to challenge their right to pursue their purpose. However, they need to do it in a transparent way and follow the rules of reporting as a PAC so voters can be aware of the level of influence before they step into the voting booth.

Please can you act quickly to pursue the complaint Paul Engles sent to you earlier. Because the next vote will be put in front of voters again very soon, it is not acceptable that the rules may continue to not be followed.

Thank you for your time.

Monica Ostby, South Burlington  


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STATE OF VERMONT  
OFFICE OF THE ATTORNEY GENERAL  
109 STATE STREET  
MONTPELIER, VT  
05609-1001

March 21, 2017

Monica Ostby  
11 Sandalwood Dr.  
South Burlington, VT 05403

Re: Campaign Finance Law Complaint

Dear Ms. Ostby:

I am writing to acknowledge receipt of your email dated March 9, 2017, in which you request that this Office investigate alleged violations of Vermont's campaign finance laws by the Marcy Brigham, Dan Emmons, and the Rebel Alliance.

This Office will be looking into your complaint to determine whether further action under 17 V.S.A. § 2904 is warranted. That provision of law provides the Attorney General with authority to investigate alleged violations and to take action when appropriate. I will contact you if we need additional information.

You will be notified when the review is complete. Please note, however, that § 2904 limits our ability to publicly disclose information obtained during the course of an investigation absent a court order or the consent of the person who provides the information.

Sincerely,

A handwritten signature in cursive script that reads "Eve Jacobs-Carnahan".

Eve Jacobs-Carnahan  
Assistant Attorney General

> On Mar 2, 2017, at 3:01 PM, Matthews, Deborah <Deborah.Matthews@vermont.gov> wrote:

>  
>  
>

> Deb Matthews  
> Administrative Secretary  
> Office of the Attorney General | GCAL  
> 109 State Street, 3rd Floor  
> Montpelier, VT 05609  
> Phone | 802-828-3689  
> E-Mail | deborah.matthews@vermont.gov (please note my new email address)

>

> -----Original Message-----

> From: Paul Engels [mailto:████████████████████]  
> Sent: Thursday, March 02, 2017 2:58 PM  
> To: AGO - Info <AGO.Info@vermont.gov>  
> Subject: South Burlington campaign finance violations

>

>>

>> Attorney General Donovan,

>>

>> As you probably know, there has been quite a bit of controversy and upheaval in South Burlington over changing the school name Rebels. Since the superintendent recommended the change and the School Board unanimously approved it, a group calling itself the Rebel Alliance has formed to oppose the change.

>>

>> They have taken on the smokescreen of opposing the school budget to try to mask their intentions and they are trying to get two of their numbers elected to the School Board as write-ins. They are Marcy Brigham and Dan Emmons.

>>

>> Although they are trying to appear as separate they are not. Their money is coming from the same people for the same cause which is to restore the Rebel name.

>>

>> Brigham and Emmons have registered as School Board candidates with the Secretary of State. The Rebel Alliance has not registered as a PAC with the Secretary of State even though they are probably over the \$1000 threshold.

>>

>> At last check, Emmons shows no income and no expenditures and Brigham shows a \$768 in-kind donation from Villanti Press for printing a full color citywide mailing.

>>

>> The Rebel Alliance is mentioned on the citywide mailing. The Rebel Alliance has also paid for two half page ads in the Other Paper, our local paper. Two half page ads cost more than \$1000 so, as I said, they are over the threshold to register as a PAC.

>>

>> Marcy Bingham and Dan Emmons have two half page ads they share and a couple other single ads. They have registered but have not accounted for their ads in their reports.

>>

>> The Rebel Alliance is having weekly meetings on Saturday afternoons at local restaurants to gather signatures on a petition to put an agenda item on a future ballot to overturn the School Board's decision and to promote the candidacies of Brigham and Emmons. I have no idea how much money they have raised or spent or from whom but with the citywide color glossy mailings and multiple newspaper ads it is obviously in the thousands.

>>

>> I hope you will look into this and that something can be done about this before the election on Tuesday. I wouldn't be surprised to find that they are getting money from out of state racist hate groups or individuals. Regardless, someone is pouring a lot of money into influencing this election and it should be stopped.

>>

>> Thank you.

>>

>> Paul Engels

>> 15 Orchard Road

>> South Burlington, VT 05403



>>

>> Sent from my iPad

**Donovan, Thomas**

---

**From:** Paul Engels <[REDACTED]>  
**Sent:** Monday, May 01, 2017 10:09 AM  
**To:** Donovan, Thomas  
**Subject:** Follow up to Shelburne meeting

TJ,

Thanks for your good thoughts on the South Burlington racial situation at your presentation in Shelburne. There are a group of us in South Burlington that are trying to get a yes vote on the school budget.

Someone in our group said that someone from the Rebel Alliance had contacted him and tried to get him to change his vote on the school budget from yes to no. Here are the points that were used:

- \* Everything was fine before the name change happened. It is obviously the problem.
- \* Changing the Rebel name was extraordinary (beyond the normal level of business the School Board handles)
- \* Name change must be voted on by the community
- \* Students very angry about name change
- \* Only 8% of students wanted this
- \* No parents support name change
- \* School Board made decision without input from the community
- \* There are no complaints of discrimination at the high school
- \* School Board panicked when a minority student said he was offended, instead of exploring options and listening to others.
- \* School Board/Admin didn't follow through with training about how Rebel name isn't offensive
- \* NAACP used Isaiah and SB to further their cause
- \* NAACP used SB as an example of how bad white communities are
- \* NAACP is generally devious and underhanded organization
- \* Isaiah says he was never discriminated against
- \* Isaiah just wanted to get into Columbia
- \* Students feel used by Isaiah
- \* Isaiah uses drugs (frequently, hardcore)
- \* Josiah is not smart
- \* Josiah didn't act all
- \* Isaiah and Josiah are friends

When I talked to you after the meeting I suggested that you investigate the Rebel Alliance as a hate group. This is the line of arguments they are using to get a no vote on the budget. They mentioned absolutely nothing about the budget. It is all based on racial fears, hatred and bigotry. Do you want to meet with us as a South Burlington parent yourself?

/Paul

Paul Engels  
15 Orchard Road  
South Burlington, VT 05403  
[REDACTED]



THOMAS J. DONOVAN, JR.  
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109 STATE STREET  
MONTPELIER, VT  
05609-1001

May 9, 2017

Paul Engels  
15 Orchard Rd.  
S. Burlington, VT 05403

RE: Follow up to Shelburne meeting

Dear Mr. Engels:

AG Donovan has provided me with your email to him of May 1, 2017. At this time we decline to investigate your allegation.

Sincerely,

A handwritten signature in cursive script that reads "John Treadwell".

John Treadwell  
Assistant Attorney General

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

JOSHUA R. DIAMOND  
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05609-1001

May 8, 2017

Paul J. Washburn  
30 Myers Court  
South Burlington, VT 05403

RE: South Burlington Budget Complaint

Dear Mr. Washburn:

I am writing in response to your letter dated April 24, 2017 in which you outline concerns you have regarding a pizza purchase made during a staff meeting at South Burlington High School on April 12, 2017. This matter should be referred to the South Burlington School Board.

Sincerely,

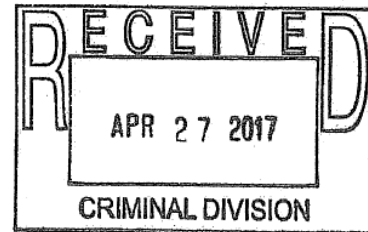
A handwritten signature in black ink, appearing to read "Ultan Doyle".

Ultan Doyle  
Assistant Attorney General

30 Myers Court  
South Burlington, VT 05403  
[REDACTED]

24 April 2017

Vermont Attorney General's Office  
109 State Street  
Montpelier, VT 05609-1001



RE: South Burlington Budget Anomalies

To Whom it may Concern:

As I am sure you are aware, the city of South Burlington is currently embroiled in a divisive fight to pass a school budget. Through this process, many concerned residents, including myself, have begun to scrutinize the practices of the School Board and Administration. This letter details a specific event which we find to be, at a minimum, questionable. The Administration is on public record (videotaped School Board meetings) offering various accounts of this event. The administrations account was versioned each time more information was publicly released (detailed below).

Given that there have been many recent instances of embezzlement around the State, and that we are at the limits of our abilities to investigate this (and other potential anomalies), the citizens of this community would like an appropriate authority to intervene and conduct a thorough investigation.

Here is a summary of what has been dubbed locally 'Pizzagate':

**12 APR 17:** The high school has a late start and there is a meeting of school staff. The administration orders lunch from Papa Franks of Winooski for a pre-tax total of \$407.65. According to the SBHS Imprest account ledger, the meal is paid for on 12 April 2017 with check no. 629 from this account. It should be noted that at this meal, a letter in support of Superintendent Young and the Administration was made available for staff to sign.

**13 APR 17:** During mid to late afternoon, and based on information from school staff, the facebook group Rebel Alliance openly begins to question the ethics of the previous day's meal. My understanding is that this SBHS Imprest Account is a "Student Activities Account", containing monies raised by students to be spent only on students. At a regularly scheduled School board meeting that evening, acting Principal Pat Phillips addresses the concern with a public statement that he and Lissa McDonald paid for the luncheon "**out of their own pockets**". Mr. Phillips stated that the intention was to 'treat' the staff to lunch to lift their spirits based on a general sense of low morale.

**14 APR 17:** Knowing that Mr. Phillips was not being truthful in his statement, members of the Rebel Alliance facebook group visited the school offices and demanded to see the ledger. At first they were provided check 6935 written from Lissa McDonald to the SBHS Imprest Checking account for \$407.65 and dated 14 APR 17. They were told the ledger would take a bit to retrieve

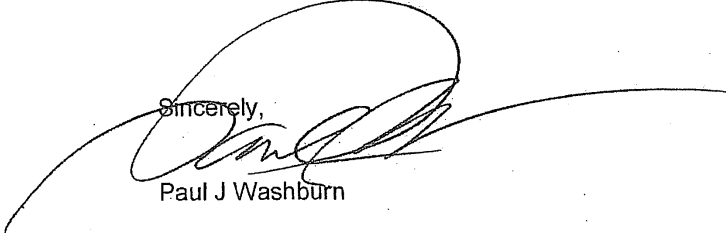
and it would be e-mailed to them. When it was made clear that their intent was to wait until the ledger was produced, it was finally presented. You will find copies of that, Ms. McDonald's check, and the Papa Franks Receipt attached. It should be noted that there was no 'Rooms and Meals' tax paid on the receipt. This is clearly stated in the upper left corner of the receipt. Since the administration has stated that this was paid 'out of their own pocket' for colleagues, I would think and expect that tax should be paid. Later that evening, the Rebel Alliance posts the attached evidence on its publicly open facebook page.

**20 APR 17:** At a regularly scheduled board meeting, Superintendent Young was challenged on this issue. He stated that Ms. McDonald's check was improperly dated 'by an office assistant', and that Pat Philips had withdrawn \$250 cash on the morning of the 12<sup>th</sup> and gave it to him (Young). When challenged later in the meeting as to why there was no cash deposit on the register, Young stated that he had misspoken earlier in the meeting and that the cash was given to Ms. McDonald.

To summarize, a \$407 lunch was paid for out of a student focused account which was reimbursed several days after the fact by the administration. It appears the rooms and meals tax on that \$407 was not paid. Throughout this, the Administration has held the attitude of 'no big deal', which readily implies that this is business as usual. Is this really an acceptable means of accounting for a public institution? It certainly does not seem transparent. My concern is beyond this one event. The South Burlington School Budget contains **over 9000 OPEN and ACTIVE general ledger accounts** (yes, nine THOUSAND). Are there other instances when this type of situation has occurred and perhaps not been repaid? How would we know? Are there other accounts that are used in this way?

I have a hard time believing the administration's most recent version of what happened. Their official story has changed at least twice to this point. With the tension in the community, it has become difficult to obtain information and investigate this further. Please consider following up on behalf of the citizens in this community.

Sincerely,



Paul J Washburn

Enclosure (as Stated)

CC:

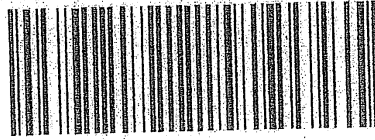
Office of Governor Phil Scott  
109 State Street, Pavilion  
Montpelier, VT 05609

Chittenden County States Attorney  
32 Cherry Street, Suite 305  
Burlington VT 05401



**CERTIFIED MAIL**

Paul Washburn  
30 Myers Court  
South Burlington, VT 05403



7016 3010 0000 2004 4570



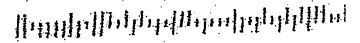
1000



05609

Vermont Attorney General's Office  
109 State Street  
Montpelier, VT 05609-1001

05609-1001-0000



---

**From:** Shafritz, Megan J.  
**Sent:** Thursday, April 06, 2017 4:10 PM  
**To:** Matthews, Deborah; Jacobs-Carnahan, Eve  
**Cc:** Silver, Natalie  
**Subject:** RE: PRESS CALL - Molly Walsh - Seven Days - 802-338-5939

Thanks. Eve will return the call.

MJS

---

**From:** Matthews, Deborah  
**Sent:** Thursday, April 06, 2017 4:08 PM  
**To:** Shafritz, Megan J. <megan.shafritz@vermont.gov>; Jacobs-Carnahan, Eve <eve.jacobs-carnahan@vermont.gov>  
**Cc:** Silver, Natalie <Natalie.Silver@vermont.gov>  
**Subject:** PRESS CALL - Molly Walsh - Seven Days - 802-338-5939  
**Importance:** High

RE: South Burlington Rebel Alliance PAC – she needs to talk with someone about this ASAP. I am copying Natalie on this because she asked to speak with Natalie, [REDACTED]

DEADLINE: ASAP – 4:30pm  
Call rec'd 4-6-17 @ 4:00pm

*Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

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**Sent:** Thursday, April 06, 2017 4:08 PM  
**To:** Shafritz, Megan J.; Jacobs-Carnahan, Eve  
**Cc:** Silver, Natalie  
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---

**From:** Matthews, Deborah  
**Sent:** Thursday, April 06, 2017 9:07 AM  
**To:** Shafritz, Megan J.; Jacobs-Carnahan, Eve  
**Subject:** FW: South Burlington PAC - Urgent

## *Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Wednesday, April 05, 2017 5:33 PM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>; Paul Engels < [REDACTED] >  
**Subject:** Re: South Burlington PAC - Urgent

Hello Deb.

Per the attached complaint about the Rebel Alliance.

I see they have now registered as a PAC - good. I learned today they have submitted two petitions to the City Clerk for approval, which would then be passed on to the SB legislative body.

My question is, if there are lawyers donating their time to help this PACs effort, do those hours need to be tracked as in-kind donations and thus be included in their financial reporting? I understand that Joe Finnigan is an active member of that group and an attorney. I do not know if he is involved with this petition. I just wanted to know how this works in relation to donated time.

Thank you.

Monica Ostby

On Wed, Mar 8, 2017 at 3:09 PM, monica ostby < [REDACTED] > wrote:

Hello Deb,

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My complaint is not in any way to challenge their right to pursue their purpose. However, they need to do it in a transparent way and follow the rules of reporting as a PAC so voters can be aware of the level of influence before they step into the voting booth.

Please can you act quickly to pursue the complaint Paul Engles sent to you earlier. Because the next vote will be put in front of voters again very soon, it is not acceptable that the rules may continue to not be followed.

Thank you for your time.  
Monica Ostby, South Burlington



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**Sent:** Wednesday, April 05, 2017 5:33 PM  
**To:** AGO - Info; Paul Engels  
**Subject:** Re: South Burlington PAC - Urgent

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Monica Ostby, South Burlington



---

**From:** Matthews, Deborah  
**Sent:** Thursday, March 30, 2017 9:25 AM  
**To:** Shafritz, Megan J.; Jacobs-Carnahan, Eve  
**Subject:** FW: South Burlington PAC - Urgent

## *Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Wednesday, March 29, 2017 5:58 PM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>; Paul Engels < [REDACTED] >  
**Subject:** Re: South Burlington PAC - Urgent

Hello Deb.

More information regarding this complaint.

Is it appropriate that Kiya, the Administrator and leader of the Rebel Alliance group, is a Federal employee working in the US House of Representatives, yet managing this group, which is really a PAC, during business hours - possibly from his Federal office, to impact a local issue? You can see from the times of his posts on Facebook that he is providing direction, answering questions, giving group directives. I truly question if this is appropriate.

Can you please pass along to the person assigned?

Thank you.

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Monica Ostby, South Burlington





---

**From:** Matthews, Deborah  
**Sent:** Friday, March 24, 2017 8:39 AM  
**To:** Shafritz, Megan J.; Jacobs-Carnahan, Eve  
**Subject:** FW: South Burlington PAC - Urgent

## *Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Friday, March 24, 2017 8:33 AM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>  
**Cc:** Paul Engels < [REDACTED] >  
**Subject:** Re: South Burlington PAC - Urgent

Hello Deb.

First, I believe the letter your office sent to me went to my old address in SB, so wanted you to have my correct info for your files. My new address is 1285 Spear Street, SB VT 05403.

Second, Due to an online conversation taking place yesterday I stumbled upon two specific threads on Facebook that were the foundation from which I become concerned about the PAC questions I had. You can see within these two threads the confusion. I hope this is helpful. Can you please forward to the correct person in your office: Thank you.

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watch: <https://www.facebook.com/groups/sbvtcommunitywatch/permalink/1467943739882621/>

And this is the parallel convo on the Rebel Alliance:  
<https://www.facebook.com/groups/sbirebelalliance/permalink/242178166243895/>

On Wed, Mar 8, 2017 at 3:09 PM, monica ostby < [REDACTED] > wrote:

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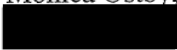
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Monica Ostby, South Burlington  


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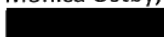
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---

**From:** Matthews, Deborah  
**Sent:** Wednesday, March 22, 2017 8:58 AM  
**To:** Shafritz, Megan J.; London, Sarah  
**Subject:** FW: South Burlington PAC - Urgent

## *Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
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Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto: ]  
**Sent:** Wednesday, March 22, 2017 8:21 AM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>  
**Cc:** Paul Engels < >  
**Subject:** Re: South Burlington PAC - Urgent

Deb, further to my question about what's been communicated, here is the conversation happening on the Rebel Alliance wall: <https://www.facebook.com/groups/sbrebelalliance/permalink/251110442017334/>

On Wed, Mar 22, 2017 at 8:17 AM, monica ostby < > wrote:

Hello Deb,

I'm seeing my name being called out on the Rebel Alliance Facebook wall. Can you tell me what the status is of the investigation? I'd like to know what information he has so I can defend my character.

Thank you.

Monica

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**Subject:** FW: South Burlington PAC - Urgent

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**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Wednesday, March 22, 2017 8:18 AM  
**To:** AGO - Info <[AGO.Info@vermont.gov](mailto:AGO.Info@vermont.gov)>  
**Cc:** Paul Engels < [REDACTED] >  
**Subject:** Re: South Burlington PAC - Urgent

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Monica Ostby, South Burlington





---

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**Sent:** Wednesday, March 22, 2017 8:21 AM  
**To:** AGO - Info  
**Cc:** Paul Engels  
**Subject:** Re: South Burlington PAC - Urgent

Deb, further to my question about what's been communicated, here is the conversation happening on the Rebel Alliance wall: <https://www.facebook.com/groups/sbirebelalliance/permalink/251110442017334/>

On Wed, Mar 22, 2017 at 8:17 AM, monica ostby <[REDACTED]> wrote:

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**From:** monica ostby <[REDACTED]>  
**Sent:** Wednesday, March 22, 2017 8:18 AM  
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**Cc:** Paul Engels  
**Subject:** Re: South Burlington PAC - Urgent

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[REDACTED]

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**From:** Matthews, Deborah  
**Sent:** Thursday, March 09, 2017 3:52 PM  
**To:** London, Sarah; Shafritz, Megan J.  
**Subject:** FW: South Burlington PAC - Urgent - another picture "revote"  
**Attachments:** revote 030917.png

## *Deb Matthews*

Administrative Secretary  
Office of the Attorney General | GCAL  
109 State Street, 3rd Floor  
Montpelier, VT 05609  
Phone | 802-828-3689  
E-Mail | [deborah.matthews@vermont.gov](mailto:deborah.matthews@vermont.gov) (please note my new email address)

**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Thursday, March 09, 2017 3:30 PM  
**To:** Matthews, Deborah <[Deborah.Matthews@vermont.gov](mailto:Deborah.Matthews@vermont.gov)>; Paul Engels < [REDACTED]>  
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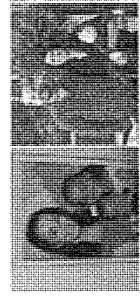
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Like 1 · 51 mins

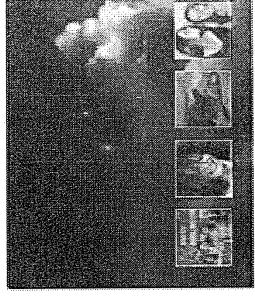
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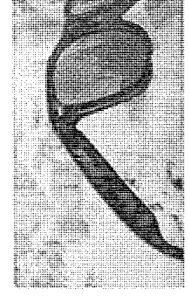
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Saved 1

Events 6

Pages

Groups 8

Friend Lists

See More...

CREATE

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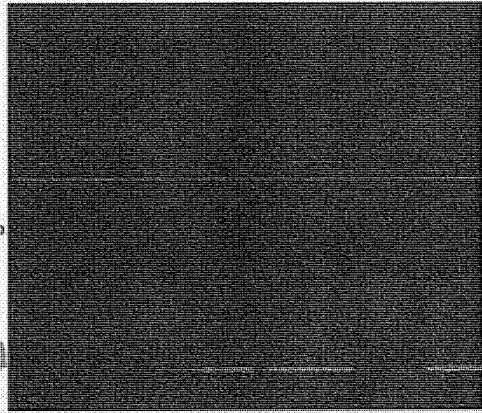
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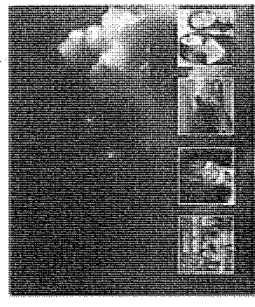
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Like · 2 mins

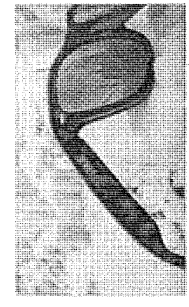
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**From:** monica ostby [mailto: [REDACTED]]  
**Sent:** Thursday, March 09, 2017 3:24 PM  
**To:** Matthews, Deborah <[Deborah.Matthews@vermont.gov](mailto:Deborah.Matthews@vermont.gov)>; Paul Engels < [REDACTED] >  
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Because the budget was voted down, the School Board need to present a second attempt within 30 days I believe to voters. The Rebel Alliance group will surely work to influence this election as well.

My complaint is not in any way to challenge their right to pursue their purpose. However, they need to do it in a transparent way and follow the rules of reporting as a PAC so voters can be aware of the level of influence before they step into the voting booth.

Please can you act quickly to pursue the complaint Paul Engles sent to you earlier. Because the next vote will be put in front of voters again very soon, it is not acceptable that the rules may continue to not be followed.

Thank you for your time.

Monica Ostby, South Burlington





RECENT ACTIVITY



Sharon Sanborn Patno  
41 mins

Front page. We are getting noticed!!



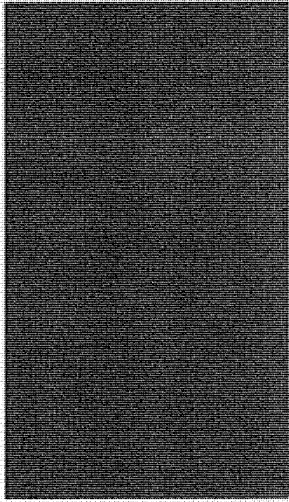
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David P. Ouell We will fight like a REBEL to keep the REBEL name  
Like - 6 mins



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