

From: Gallagher, Kate
Sent: Wednesday, February 28, 2018 4:16 PM
To: 'akeays@vtdigger.org' <akeays@vtdigger.org>
Subject: FW:

Dear Mr. Keays, Please see the attached letter responding to your recent public records request. Please let me know if you have any questions. KTG

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VIA ELECTRONIC AND REGULAR MAIL

February 28, 2018

Mr. Alan J. Keays
VTDigger.org
26 State Street
Montpelier, VT 05609

Re: *Public Records Request*

Dear Mr. Keays:

I am in receipt of your February 27, 2018 public records request for “any and all information related to the cost to the Vermont Attorney General’s office in redacting documents related to [the] case State v. Quiros, Stenger, including the cost of redacting the documents for exemptions for executive privilege and the attorney/client privilege.”

At present, the Vermont Attorney General’s Office (“AGO”) has not redacted any documents that have been produced to the Defendants in this case. Rather, as part of the normal discovery process, we have reviewed documents that are potentially responsive to discovery requests to identify and segregate any documents that are privileged or contain privileged information. However, the documents do contain personally identifiable information that cannot be disclosed publicly, so the State produced the documents to the Defendants subject to a protective order.

The Department of Financial Regulation (“DFR”) may be able to be of further assistance to you in obtaining the information you seek. As you know, DFR has been redacting documents to produce them as part of the Governor’s Document Disclosure Plan for this case. To this end, DFR has retained Percipient, LLC to redact the documents. Please note that DFR is redacting the documents to eliminate personally identifiable information from the documents, not to redact portions of documents protected by the executive or attorney-client privileges.

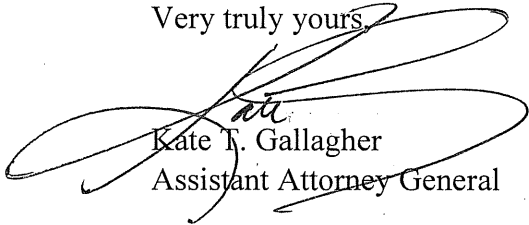
While the information you have requested does not exist and cannot be provided to you, I did estimate the total number of hours spent by AGO attorneys to review and segregate the privileged documents. By my estimate, the AGO has spent approximately 725 hours reviewing the documents to identify privileged documents in this case. The purpose of this review is to

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fulfill our professional obligations to our clients. I would stress that this is a rough approximation only, but I thought it might be useful.

I hope that this information is helpful. Please do not hesitate to contact our office if you need additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kate T. Gallagher", is written over the typed name and title. The signature is stylized with large, sweeping loops.

Kate T. Gallagher
Assistant Attorney General

KTG/mg