

From: AGO - Correspondence
Sent: Thursday, March 29, 2018 11:48 AM
To: [REDACTED]
Subject: response to public record act request

Dear Mr. Kulkin,

Please find attached a response to your public record act request.

Thank you,

Jessica Mishaan | Paralegal
Office of the Attorney General | Civil Division
109 State Street Montpelier, VT 05609-1001

PRIVILEGED & CONFIDENTIAL COMMUNICATION: This communication may contain information that is privileged, confidential, and exempt from disclosure under applicable law. DO NOT read, copy or disseminate this communication unless you are the intended addressee. If you are not the intended recipient (or have received this E-mail in error) please notify the sender immediately and destroy this E-mail. Vermont's lobbyist registration and disclosure law applies to certain communications with and activities directed at the Attorney General. Prior to any interactions with the Office of the Vermont Attorney General, you are advised to review Title 2, sections 261-268 of the Vermont Statutes Annotated, as well as the Vermont Secretary of State's most recent compliance guide available at <https://www.sec.state.vt.us/elections/lobbying.aspx>.

THOMAS J. DONOVAN, JR.
ATTORNEY GENERAL

JOSHUA DIAMOND
DEPUTY ATTORNEY GENERAL

WILLIAM E. GRIFFIN
CHIEF ASST. ATTORNEY GENERAL



TEL: (802) 828-3171
FAX: (802) 828-2154

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

March 29, 2018

Joey Kulkin

Via email to: [REDACTED]

Dear Mr. Kulkin:

Attached please find records in response to your public record act request dated March 24, 2018. Personal contact information has been redacted pursuant to 1 V.S.A. § 317(c)(7), and two pieces of correspondence have been withheld as otherwise confidential by law and exempt from disclosure pursuant to 1 V.S.A. § 317(c)(1). Please note publicly available information related to your public record act request and your campaign finance complaint at: <https://campaignfinance.sec.state.vt.us/Public/ViewFiledReports>.

If you feel information has been withheld in error, you may appeal to Deputy Attorney General Joshua Diamond.

By separate correspondence you have been advised of the resolution of your campaign finance complaint today.

Sincerely,

/s/ Sarah E.B. London

Sarah London
Assistant Attorney General

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

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

March 14, 2018

Aaron Sawyer
311 Pleasant Street
Bennington, VT 05201

Re: Campaign Finance Law Complaint

Dear Mr. Sawyer,

I am writing to inform you that the Attorney General's Office has received correspondence involving a possible campaign finance law violation. A copy of the correspondence is enclosed; it alleges that lawn signs related to the local election held March 6, 2018, did not include disclosure information that may be required by Vermont's campaign finance laws, including 17 V.S.A. § 2972.

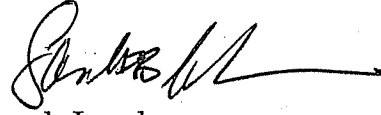
We are not aware of prior complaints of a similar nature regarding your campaign materials. In addition, we understand at this time that there may have been inadvertent omissions with respect to disclosures on lawn signs related to the Town of Bennington March 6, 2018 election. The Attorney General's Office will therefore take no further action with regard to this matter at this time. Please take care, however, that any future advertisements meet the requirements of 17 V.S.A. § 2972, which requires electioneering communications to "contain the name and mailing address of the person, candidate, political committee, or political party that paid for the communication."

Should you decide to campaign again, you must comply with all applicable campaign finance laws. Information about Vermont's campaign finance laws is available through the Secretary of State's website at:
<https://www.sec.state.vt.us/elections.aspx>.

We hope the above information is helpful to you.

March 14, 2018
Letter to Aaron Sawyer

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah London", with a long horizontal flourish extending to the right.

Sarah London
Assistant Attorney General.

Enclosure

From: "William H. Stewart"

To: "London, Sarah"

Subject: Re: Response to your letter - Campaign Finance Law Compliance

Hi Sarah,

I was driving in town this morning and noticed the folks against a Mayor (Aaron Sawyer) and Don Campbell (incumbent for Select Board) do not have the proper verbiage on their signs, and they appear to be in violation of the Campaign Finance Law. Please see the pictures below. Please let me know if you have any questions or require further information. Thank you.

Sincerely,

William Stewart

Bennington, VT 05201



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ATTORNEY GENERAL

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STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001
March 26, 2018

Aaron Sawyer
311 Pleasant Street
Bennington, VT 05201

Re: Campaign Finance Law Complaint

Dear Mr. Sawyer,

I am writing to inform you that the Attorney General's Office has received the attached complaint of a possible campaign finance law violation by your organization. The complaint alleges that Citizens Against Article Two has received and expended contributions without filing disclosures with the Secretary of State's Office, contrary to Vermont's Campaign Finance Laws, including 17 V.S.A. § 2922. Publicly available information shows the filing of a campaign finance report by Citizens Against Article Two on February 25, 2018, and previously on February 13, 2018.

The Attorney General's Office has a role in the enforcement of Vermont's campaign finance laws. See 17 V.S.A. § 2904. We would like to give you an opportunity to respond to the complaint. Please provide us with a written response to the allegations by Monday April 9, 2018.

In particular, your response should address whether Citizens Against Article Two has filed disclosures with the Secretary of State's Office since February 25, 2018, and provide us with copies of any such documents.

Please direct your response to me at the above address or email at AGO.Info@vermont.gov. We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah London".

Sarah London
Assistant Attorney General

Enclosure

London, Sarah

From: Spottswood, Eleanor
Sent: Monday, March 26, 2018 10:14 AM
To: London, Sarah
Subject: Fwd: Election Reporting Complaint

From: Matthews, Deborah
Sent: Wednesday, March 21, 2018 11:41:50 AM
To: Joey Kulkin
Subject: RE: Election Reporting Complaint

Dear Mr. Kulkin:

We understand you have submitted the below complaint regarding a possible campaign finance violation relating to Citizens Against Article Two, Aaron Sawyer, registrant. We will provide the registrant with a copy of your complaint.

You will be notified when the review is complete. Please note, however, that 17 V.S.A. § 2904 limits our ability to publicly disclose information obtained in the course of an investigation, absent a court order or the consent of the person who provides the information.

Thank you.

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

From: Joey Kulkin
Sent: Wednesday, March 21, 2018 7:52 AM
To: AGO - Info <AGO.Info@vermont.gov>
Subject: Election Reporting Complaint

March 21, 2018

To Attorney General Donovan,

I am filing this complaint against Citizens Against Article Two (Aaron Sawyer registrant) in light of the fact the political action committee did not file a required disclosure report on activities related to the March 6, 2018 Town Meeting.

Citizens Against Article Two's 2/24 filing shows \$1,143 raised. Mr. Sawyer went on record saying his PAC sent out 1,700 postcards in support of their cause. I received one of the graphics-heavy postcards with a stamp. Postcard stamps cost 34 cents, which comes out to \$578. CAAT also plastered the town with between 30 and 100 lawn signs.

Report Name :	Citizens Against Article Two	Election Cycle :	2018 Annual Meeting (All Towns)
Report Due Date :	February 24, 2018	Due Filed :	February 25, 2018

SURPLUS FROM PREVIOUS CAMPAIGN

Total Surplus from previous Campaign	\$ 0.00
Total Carry Forward to the current campaign (surplus - donations + interest)	\$ 0.00

CONTRIBUTIONS AND EXPENDITURE SUMMARY

SUMMARY OF CONTRIBUTIONS AND EXPENDITURE	THIS PERIOD	CAMPAIGN TO DATE
CONTRIBUTIONS		
A. Total Contributions over \$100	\$0.00	\$0.00
B. Total Contributions \$100 or less	\$1,143.00	\$1,143.00
C. Number of Contributions	14	14
D. Number of Contributions \$100 or less	14	14
E. Subtotal of non-monetary (in-kind) contributions	\$0.00	\$0.00
F. Subtotal of monetary contributions (A + B + E)	\$1,143.00	\$1,143.00
TOTAL CONTRIBUTIONS (E + F)	\$1,143.00	\$1,143.00
EXPENDITURES		
G. Total Expenditures (excluding Mass Media \$500 or more)	\$0.00	\$0.00
H. Total Mass Media Expenditure \$500 or more	\$0.00	\$0.00
I. Number of Mass Media Expenditure \$500 or more	0	0
TOTAL EXPENDITURES (G + H)	\$0.00	\$0.00

According to Will Senning, Director of Elections and Campaign Finance in the Vermont Secretary of State's Office,

A group that raises or spends \$500 or more is required to register and file disclosure reports. Citizens Against Article 2 are required to continue filing disclosures until they close the campaign with a final report.

The most recent filing deadline was midnight March 20, 2018.

As of today, March 21, Mr. Sawyer has not filed the required disclosure.

Mr. Donovan, I ask your office to address this issue.

Thank you,
 Joey Kulkin
 Bennington

From: [Farnsworth, Karen](#)
To: [REDACTED]
Cc: [London, Sarah](#)
Subject: Citizens Against Article Two
Date: Wednesday, March 28, 2018 4:48:01 PM
Attachments: [2018-03-28 Sawyer Close Out.pdf](#)

Mr. Sawyer,
Attached please find a final response from Sarah London. Thank you.

Karen M. Farnsworth

AGO Paralegal I
Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609
802-828-5500
karen.farnsworth@vermont.gov

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March 28, 2018

Mr. Aaron Sawyer
311 Pleasant Street
Bennington, VT 05201

Via email: [REDACTED]

Re: Campaign Finance Complaint

Dear Mr. Sawyer,

Thank you for your prompt response to our letter dated March 26, 2018. At this time, the Vermont Attorney General's Office has determined that no further action is necessary with regards to the campaign finance complaint lodged against you on March 21, 2018. We are closing the complaint in light of your recent filing with the Secretary of State's Office and because your omission was inadvertent. We understand you will also make the necessary filing on April 15, 2018.

Please take care that future reports meet the requirements of Vermont's campaign finance laws and the deadlines set by the Secretary of State's Office. Information about Vermont's campaign finance laws, including the deadlines for various reports, is available through the Secretary of State's website at:
<https://www.sec.state.vt.us/elections/campaign-finance.aspx>.

Thank you again for your prompt attention to this matter and we hope the above information is helpful to you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sarah London".

Sarah London
Assistant Attorney General