From: <u>Curtis, Christopher</u>

To:
Subject: Public Records Response

Date: Tuesday, December 31, 2019 4:56:00 PM
Attachments: Heck Cover Letter - PRA Response.pdf

Heck PRA Response.pdf

Dear Mr. Heck,

Attached please find a cover letter and response to your recent public records request. I hope this is helpful.

I wish you a very Happy New Year.

Best, Christopher

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-828-5586

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THOMAS J. DONOVAN, JR. ATTORNEY GENERAL

JOSHUA R. DIAMOND DEPUTY ATTORNEY GENERAL

SARAH E.B. LONDON CHIEF ASST, ATTORNEY GENERAL



TEL: (802) 828-3171

http://www.ago.vermont.gov

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

December 31, 2019

Mr. Martin Heck

SENT BY ELECTRONIC MAIL:

Dear Mr. Heck,

Thank you for your recent public records act request. You requested "all AGO correspondence regarding Marlboro College." I understand from our conversation that you are interested in documents or correspondence relating to the proposed merger of Marlboro College. Please accept the attached electronic file containing the response to your request.

Information contained in internal communications of the Attorney General's Office that contains work product, attorney client communication, or personal information is redacted pursuant to 1 V.S.A. §§ 317(c)(1), (3), (4), and (7).

If you feel information has been withheld (redacted) in error, you may appeal to the Deputy Attorney General Josh Diamond. We hope the attached information is helpful to you.

Sincérely

Thank you for reaching out to our office.

Christopher J. Curtis

Chief, Public Protection Division

From:

Curtis, Christopher

Sent:

Friday, December 13, 2019 12:58 PM

To:

Jandl, Lauren

Cc:

Renner, Jamie; Clark, Charity; Diamond, Joshua

Subject:

Re: Brattleboro Reformer inquire re: Marlboro College

Thanks, Jamie.

CC

Sent from my iPhone

On Dec 13, 2019, at 12:40 PM, Jandl, Lauren < Lauren. Jandl@vermont.gov > wrote:

Hi Jamie, Charity is our today. Do you want to give me a call? 802-595-8679. I'm with TJ.

Sent from my iPhone

On Dec 13, 2019, at 12:24 PM, Renner, Jamie < Jamie.Renner@vermont.gov > wrote:

I talked to Bob. Charity, give me a call when you get a second.

From: Clark, Charity < Charity.Clark@vermont.gov>

Sent: Friday, December 13, 2019 10:33 AM

To: Curtis, Christopher < Christopher.Curtis@vermont.gov>
Cc: Jandl, Lauren Lauren.Jandl@vermont.gov>; Renner, Jamie

<Jamie.Renner@vermont.gov>

Subject: Re: Brattleboro Reformer inquire re: Marlboro College

I spoke with Bob just now and he is hoping to email TJ today. Could your background phone call to him happen ASAP please? Also, TJ would like an update on where things stand so he will be well prepared. Please email him, cc'ing Josh, Lauren, and me, at your earliest convenience. Thanks, all!

Charity

Sent from my iPhone

On Dec 12, 2019, at 5:52 PM, Curtis, Christopher < Christopher.Curtis@vermont.gov wrote:

Sounds good. Jamie, can you please give Bob a call back tomorrow? Thanks!

CC

Sent from my iPhone

On Dec 12, 2019, at 4:07 PM, Clark, Charity Charity.Clark@vermont.gov wrote:

Hi, Chris and Jamie,

Bob Audette from the Brattleboro Reformer (802-254-2311, ext 215) called looking for background information on the AG's role as to the transfer of funds by a nonprofit such as Marlboro. If you're comfortable, could one of you please give Bob a call to provide background info, but clarify that the conversation is off-the-record. If he would like a quote or on-the-record conversation, send him back my way.

Thanks, Charity

Charity R. Clark
Chief of Staff
Office of the Attorney General
109 State Street
Montpelier, Vermont 05609
802-828-3737

Received. Thank you.

From: Sent:

To: Subject: Curtis, Christopher

Matthews, Deborah

Monday, December 9, 2019 3:11 PM

RE: Contact Form submitted on Office of the Vermont Attorney General

cc						
Christopher J. Curtis Chief, Public Protection Division						
Office of the Attorney General						
State of Vermont						
109 State Street						
Montpelier, VT 05609 802-828-5586						
602-626-55du						
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From: Matthews, Deborah < Deborah. Matthews@vermont.gov>						
Sent: Monday, December 9, 2019 3:08 PM						
To: Curtis, Christopher < Christopher. Curtis@vermont.gov>						
Subject: FW: Contact Form submitted on Office of the Vermont Attorney General						
Deb Matthews						
Administrative Assistant						
Office of the Attorney General GCAL						
109 State Street, 3 rd Floor						
Montpelier, VT 05609						
Phone 802-828-3689						
E-Mail \ deborah.matthews@vermont.gov						
From: Office of the Vermont Attorney General <ago.helpdesk@vermont.gov></ago.helpdesk@vermont.gov>						
Sent: Wednesday, November 27, 2019 8:49 PM						
To: AGO - Info < <u>AGO.Info@vermont.gov</u> >						
Subject: Contact Form submitted on Office of the Vermont Attorney General						
Name						
Last						
1						

Email	
Phone Number	
Mailing Address (required for a response)	
Subject	Marlboro College Endowment
Message	I'm a graduate of Marlboro College. I have serious concerns that Marlboro's proposed merger with Emerson College involves a misuse of Marlboro's \$30 million-plus endowment, and I urge your office to investigate. "Gifting" the endowment to an out-of-state institution is clearly not the reason the endowment was established or the purpose for which the funds were given. My understanding is that a major portion of the endowment is restricted, underscoring my concerns about misuse. The impact of Marlboro's closing on the town and the region will be significant, and the loss to future students is immeasurable. One last note: several viable alternatives to this merger have been proposed all of which would leave the campus open and the endowment intact. Many thanks.

From:

Curtis, Christopher

Sent:

Friday, December 6, 2019 2:51 PM

To:

Renner, Jamie

Subject:

RE: Contact Form submitted on Office of the Vermont Attorney General

Got it. Thanks.

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-828-5586

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From: Renner, Jamie < Jamie.Renner@vermont.gov>

Sent: Friday, December 6, 2019 2:40 PM

To: Curtis, Christopher < Christopher. Curtis@vermont.gov>

Subject: FW: Contact Form submitted on Office of the Vermont Attorney General

fyi

From: Matthews, Deborah < Deborah. Matthews@vermont.gov >

Sent: Friday, December 6, 2019 2:39 PM

To: Clark, Charity < Charity.Clark@vermont.gov >; Renner, Jamie < Jamie.Renner@vermont.gov >

Subject: FW: Contact Form submitted on Office of the Vermont Attorney General

Are either one of you handling Marlboro College?

Deb Matthews

Administrative Assistant
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: Office of the Vermont Attorney General ago.helpdesk@vermont.gov

Sent: Wednesday, November 27, 2019 8:49 PM

To: AGO - Info <AGO.Info@vermont.gov>

Subject: Contact Form submitted on Office of the Vermont Attorney General

Name	
Last	
Email	
Phone Number	
Mailing Address (required for a response)	
Subject	Marlboro College Endowment
Message	I'm a graduate of Marlboro College. I have serious concerns that Marlboro's proposed merger with Emerson College involves a misuse of Marlboro's \$30 million-plus endowment, and I urge your office to investigate. "Gifting" the endowment to an out-of-state institution is clearly not the reason the endowment was established or the purpose for which the funds were given. My understanding is that a major portion of the endowment is restricted, underscoring my concerns about misuse. The impact of Marlboro's closing on the town and the region will be significant, and the loss to future students is immeasurable. One last note: several viable alternatives to this merger have been proposed all of which would leave the campus open and the endowment intact. Many thanks.

E.	•	m	

Clark, Charity

Sent:

Friday, December 6, 2019 6:11 PM

To:

Matthews, Deborah

Cc:

Renner, Jamie; Curtis, Christopher

Subject:

Re: Contact Form submitted on Office of the Vermont Attorney General

I believe this might be Chris.

Charity

Sent from my iPhone

On Dec 6, 2019, at 2:39 PM, Matthews, Deborah < Deborah. Matthews@vermont.gov> wrote:

Are either one of you handling Marlboro College?

Deb Matthews

Administrative Assistant
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: Office of the Vermont Attorney General <ago.helpdesk@vermont.gov>

Sent: Wednesday, November 27, 2019 8:49 PM
To: AGO - Info <AGO.Info@vermont.gov>

Subject: Contact Form submitted on Office of the Vermont Attorney General

Name				
Last				
Email				
Phone Number				
Mailing Address (required for a response)		N		
Subject	Marlboro College Endowment			

Message

I'm a graduate of Marlboro College. I have serious concerns that Marlboro's proposed merger with Emerson College involves a misuse of Marlboro's \$30 million-plus endowment, and I urge your office to investigate. "Gifting" the endowment to an out-of-state institution is clearly not the reason the endowment was established or the purpose for which the funds were given. My understanding is that a major portion of the endowment is restricted, underscoring my concerns about misuse. The impact of Marlboro's closing on the town and the region will be significant, and the loss to future students is immeasurable. One last note: several viable alternatives to this merger have been proposed all of which would leave the campus open and the endowment intact. Many thanks.

From:

Renner, Jamie

Sent:

Wednesday, November 20, 2019 9:25 AM

To:

Curtis, Christopher

Subject:

FW: Contact Form submitted on Office of the Vermont Attorney General

Fyi - to discuss

From: Matthews, Deborah < Deborah. Matthews@vermont.gov>

Sent: Monday, November 18, 2019 10:13 AM

To: Renner, Jamie < Jamie.Renner@vermont.gov>

Subject: FW: Contact Form submitted on Office of the Vermont Attorney General

Jamie, does this fall under your umbrella?

Deb Matthews

Administrative Assistant
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: Office of the Vermont Attorney General ago.helpdesk@vermont.gov

Sent: Friday, November 15, 2019 4:42 PM To: AGO - Info < AGO.Info@vermont.gov>

Subject: Contact Form submitted on Office of the Vermont Attorney General

Name			
Last			
Email			
Phone Number			
Mailing Address (required for a response)			
Subject	Intended closure/merger of Marlboro College with Emerson Collegea parental question		
Message	Does the Attorney General of the State of Vermont have any oversight responsibilities with regard to a Vermont educational institution closing/merging with an out of state educational institution? Does the Attorney General have regulatory authority to determine if the Trustees of Marlboro College have		

complied with terms and conditions of all gifts and grants to the college as a result of over sixty years of fundraising? Is there any state review mechanism of a educational board of trustees decision to gift Vermont charitable assets including real property to an out of state institution? When a Vermont charitable organization ceases operations, shouldn't those assets be distributed within Vermont for similar charitable purposes?

From:

Francis, Jennifer

Sent:

Monday, November 18, 2019 8:29 AM

To: Cc: Renner, Jamie Curtis, Christopher

Subject:

FW: Marlboro College and Emerson College

From:

Sent: Friday, November 15, 2019 4:31 PM

To: AGO - Non-Profit <AGO.Non-Profit@vermont.gov>

Subject: Marlboro College and Emerson College

Dear AGO,

I called the office of the attorney general last week and the person that I talked to on the phone gave me this email address and suggested that I send my inquiry via email

I am a resident of Putney Vermont and became aware, from a current student of Marlboro College, of a situation involving Marlboro College of Marlboro, VT and Emmerson College of Boston, MA. The student explained a situation where Marlboro College was closing and negotiating with Emmerson College to transfer or gift the endowment and real estate of Marlboro College to Emmerson in exchange for taking the students and offering Tenure to the teachers. As I learn more of the situation it appears to be factual.

I recently began to read online through some Facebook groups that were started by some of the Marlboro College Alumni that the process and information has been very secretive on the part of Emerson and Marlboro. The Alumni have expressed frustration about being left out of the process and not receiving any information from the colleges or Trusties. They naturally express concern and disappointment regarding the demise of Marlboro and also offer money and solutions which they perceive as ignored by the Marlboro Administration and Trusties. My interest in this situation is as a Putney Vermont citizen that feels disturbed by the consistent closing of the smaller private non profit colleges though out the country and especially in Vermont. The viability of Marlboro college appears to be significant in my view and also many of the Marlboro Alumni. The college has almost no debt, and endowment of Thirty million dollars (\$30,000,000), and real estate worth at least twelve million dollars (\$12,000,000). The college indicates problems maintaining an enrollment of students at their capacity of about 150 students and this effects their budget and is their stated reason for searching for a college to partner with.

My issue and reason for contact to your office is that if the college ends up closing, the assets, if not returned to

original donors, must be distributed to an equivalent 501(3)c entity. I feel that the potential choice of Emmerson is not appropriate for a number of reasons including, but not limited to its size, location, philosophy and its not a Vermont School. Moreover, the current proposal being considered is that the total assets of Marlboro College, totaling about Forty-two million dollars (\$42,000,000) are being transferred to the Boston, MA school in exchange for direct benefits to private individuals. Any potential benefit to Emerson College is offset and completely negated by the requirement of Marlboro College that they accept the students at their current tuition rates, many of whom pay no tuition, and also offer all jobs to all tenure and tenure track

teachers. It is my concern that this quid pro quo is a backdoor benefit to specific individuals rather than in the best pubic interest, especially to the Citizens and students of Vermont.

I wish to make an inquiry to the Attorney General as to the present status of this situation within the AG's office. I also wish to be advised, is possible, as to the specific procedure to voice objection to the AGs office regarding any submitted proposals by Emerson College and Marlboro College for the transfer of the Endowment and real estate holdings of Marlboro College to Emerson College.

Thank you very much.

Sincerely,



From:

Clark, Charity

Sent:

Tuesday, November 5, 2019 3:35 PM

To:

Curtis, Christopher; Diamond, Joshua; Jandl, Lauren

Cc:

Renner, Jamie

Subject:

RE: Marlboro news

Thanks, Chris. Looping in Lauren.

Charity

From: Curtis, Christopher < Christopher. Curtis@vermont.gov>

Sent: Tuesday, November 5, 2019 3:07 PM

To: Diamond, Joshua < Joshua. Diamond@vermont.gov>; Clark, Charity < Charity. Clark@vermont.gov>

Cc: Renner, Jamie < Jamie.Renner@vermont.gov>

Subject: Fwd: Marlboro news ·

I have put in a call to the President and asked him to call me back. Will provide an update as soon as I have more to report. It does sound like they are aware of their notice obligations and will work with our office to provide all necessary information, so that is good.

Be advised that they are announcing this tomorrow.

Best, Christopher

Sent from my iPhone

Begin forwarded message:

From: Kevin Quigley < kevin@marlboro.edu > Date: November 5, 2019 at 11:56:11 AM CST

To: "Curtis, Christopher" < Christopher. Curtis@vermont.gov >

Subject: Marlboro news

Christopher,

I called your office to discuss this but learned that you are away at a conference. Thus, this email.

Tomorrow, we will announce that we have taken the first step towards an alliance with an institution that we are truly excited about. While this alliance meets our objectives around identity, pedagogy and support for our students and faculty, it will involve moving from Potash Hill.

In exchange for the transfer of our assets (endowment and campus), the alliance partner will rename an Institute and take all of our faculty and staff. As we discussed before, we will work closely with your office on the possible transfer of these assets.

Do you have some time later today or tomorrow that we might discuss this? If that doesn't work for you, I will send you a copy of the announcement and will be glad to talk about our plans at your convenience.

Warm regards,

Kevin Q.



(f)(9)(8)

Kevin F. F. Quigley President

802.258.9245 | kevin@marlboro.edu www.marlboro.edu Twitter: @PrezKQ



From:

Diamond, Joshua

Sent:

Sunday, July 28, 2019 9:54 PM

To:

Curtis, Christopher

Cc:

Clark, Charity; Renner, Jamie

Subject:

RE: Marlboro College

Thanks for the update. Josh

Joshua R. Diamond, Deputy Attorney General Vermont Attorney General's Office 109 State Street Montpelier, Vermont 05609 802-828-3175 joshua.diamond@vermont.gov

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From: Curtis, Christopher < Christopher. Curtis@vermont.gov>

Sent: Friday, July 26, 2019 10:25 AM

To: Diamond, Joshua < Joshua. Diamond@vermont.gov>

Cc: Clark, Charity < Charity. Clark@vermont.gov>; Renner, Jamie < Jamie. Renner@vermont.gov>

Subject: Marlboro College

Josh,

Jamie and I had a conference call w/Kevin Quigley (President) of Marlboro College this morning. They provided context/background for its proposed merger with Bridgeport University (a CT non-profit). We advised him of its obligation to provide notice 20 days prior to consummation and inquired about record-keeping obligations (via Board of Ed and AOE) and he advised they have been in touch on that score. They do not anticipate consummation of the plan until December and are keeping all parties, students, and the public in that area well in the loop. They have been operating at about half the student occupancy load that would be optimal for the school and the expectation is that the merger will help to ensure that a full complement of up to 300 students (currently they have app. 150 enrolled) will return to the campus. Currently, they only have entered into a letter of intent with Bridgeport, but they anticipate providing us with the required notice and a copy of the final merger plan once it is complete and prior to consummation. Their counsel is Jeff McMahon at Dinse who suggested they be in touch with us. Mr. Quigley advised they will keep us in the loop as plans develop.

Please let me know if you need/want more information.

Best, Christopher

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-828-5586

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From:

Kevin Quigley <kevin@marlboro.edu>

Sent:

Friday, July 26, 2019 3:41 PM

To:

Curtis, Christopher

Cc:

Renner, Jamie; jmcmahan@dinse.com

Subject:

Re: Thanks for your time

Dear Christopher and Jamie,

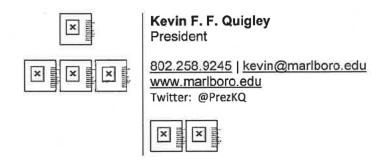
Thank you for sending this note following up on our conversation this morning.

We will be in touch as we proceed through this merger process.

With gratitude in advance for your assistance,

Sincerely,

Kevin Q.



On Fri, Jul 26, 2019 at 2:16 PM Curtis, Christopher < Christopher.Curtis@vermont.gov wrote:

Dear Mr. Quigley,

Thanks for your time this morning.

Per our conversation, please find my contact information (below) and Jamie Renner's email address (copied here). You had called to let our office know of Marlboro College's plan to merge with Bridgeport University (as reported in the media yesterday). We appreciate your outreach. Please note that there are certain statutory notice obligations for mergers involving public benefit corporations that may apply to your institution that relate to our office, in addition to any other statutory requirements that may or may not apply. Our office does not provide legal advice, however your attorney (also copied here) is best positioned to assist you further with meeting any/all obligations your institution may have relating to the proposed merger.

Thank you again for your time and consideration. Please do not hesitate to reach out to this office in the future if we can be of assistance.

Best, Christopher

Christopher J. Curtis

Chief, Public Protection Division

Office of the Attorney General

State of Vermont

109 State Street

Montpelier, VT 05609

802-828-5586

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From:

Curtis, Christopher

Sent:

Monday, December 9, 2019 10:33 AM

To:

Jeff McMahan

Cc:

Clark, Charity; Sudbay, William

Subject:

Re: Marlboro Meeting

Hi Jeff,

Yes. Thanks for your quick response. I'm copying the General's Chief of Staff and Scheduler (Charity Clark and Will Sudbay, respectively) so that Will can arrange a mutually agreeable time to meet after the 12th.

Thanks again for your time and consideration.

Best, Christopher

Sent from my iPhone

On Dec 9, 2019, at 9:48 AM, Jeff McMahan < imcmahan@dinse.com > wrote:

Chris -

I am writing to follow up on our phone conversation last week. Marlboro would be happy to meet with your office in January. Kevin Quigley will be out of Vermont from New Year's through January 12th. Could we look at setting up a time after that?

Best,

Jeff.

<image001.jpg> Jeffrey J. McMahan

Attorney

Bio | V-Card | LinkedIn

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From:

Curtis, Christopher

Sent:

Monday, December 9, 2019 1:46 PM

To:

Matthews, Deborah

Subject:

Re: Are you the go-to for Marlboro College matters?

Yes. Thanks.

Sent from my iPhone

On Dec 9, 2019, at 1:27 PM, Matthews, Deborah < Deborah.Matthews@vermont.gov > wrote:

Charity that perhaps you were...

Deb Matthews

Administrative Assistant
Office of the Attorney General | GCAL
109 State Street, 3rd Floor
Montpelier, VT 05609
Phone | 802-828-3689
E-Mail \ deborah.matthews@vermont.gov

Erom	
FIOIII.	

Curtis, Christopher

Sent:

Wednesday, December 18, 2019 3:55 PM

To:

Jeff McMahan

Cc: Subject: Sudbay, William Re: Date?

Great. Thanks. Will do.

CC

Sent from my iPhone

On Dec 18, 2019, at 3:50 PM, Jeff McMahan < imcmahan@dinse.com > wrote:

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

Chris and Will -

I am still waiting on one more confirmation, but let's hold January 20th at 2 pm for now.

Jeff.

<image002.jpg> Jeffrey J. McMahan

Attorney

209 Battery Street | Burlington, VT 05401 E: jmcmahan@dinse.com W: dinse.com

Bio | V-Card | LinkedIn

From: Jeff McMahan

Sent: Wednesday, December 18, 2019 11:47 AM

To: 'Curtis, Christopher' Cc: Sudbay, William Subject: RE: Date?

I expect to get back to Will today with a date out of some options that Will gave us.

Jeff.

<image003.jpg> Jeffrey J. McMahan

Attorney

Bio | V-Card | Linkedin

From: Curtis, Christopher [mailto:Christopher.Curtis@vermont.gov]

Sent: Wednesday, December 18, 2019 11:45 AM

To: Jeff McMahan Cc: Sudbay, William Subject: Date?

Hi Jeff,

Do we have a date/time for the meeting yet? I thought we did, but I'm not seeing the meeting on my January calendar. If so, please remind me. If not, please touch base with your folks and then coordinate with Will Sudbay (AG Donovan's scheduler).

Thanks!

Best, Christopher

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-828-5586

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This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**.

From:

Curtis, Christopher

Sent:

Wednesday, December 18, 2019 11:49 AM

To: Subject: Jeff McMahan RE: Date?

Great. Thanks.

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609
802-828-5586

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From: Jeff McMahan <jmcmahan@DINSE.COM> Sent: Wednesday, December 18, 2019 11:47 AM

To: Curtis, Christopher < Christopher. Curtis@vermont.gov> Cc: Sudbay, William < william.sudbay@partner.vermont.gov>

Subject: RE: Date?

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

I expect to get back to Will today with a date out of some options that Will gave us.

Jeff.



Jeffrey J. McMahan

Attorney

209 Battery Street | Burlington, VT 05401

P: 802-859-7013 **C:** 802-343-5958

E: imcmahan@dinse.com W: dinse.com

Bio | V-Card | LinkedIn

From: Curtis, Christopher [mailto:Christopher.Curtis@vermont.gov]

Sent: Wednesday, December 18, 2019 11:45 AM

To: Jeff McMahan

Cc: Sudbay, William Subject: Date?

Hi Jeff,

Do we have a date/time for the meeting yet? I thought we did, but I'm not seeing the meeting on my January calendar. If so, please remind me. If not, please touch base with your folks and then coordinate with Will Sudbay (AG Donovan's scheduler).

Thanks!

Best, Christopher

Christopher J. Curtis Chief, Public Protection Division Office of the Attorney General State of Vermont 109 State Street Montpelier, VT 05609 802-828-5586

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