

From: [Jandl, Lauren](#)
To: [Dave Gram](#)
Subject: Public Records Request
Date: Thursday, February 11, 2021 3:22:07 PM
Attachments: [2021_02_09_Goddard_settlement_ag_signed_Redacted.pdf](#)

Hi, Dave,

In response to the public records request you made when we met earlier today, attached is a copy of the settlement agreement signed by Mr. Goddard.

Best,

Lauren

Lauren Jandl
Assistant Director of Communications

Vermont Attorney General's Office
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Montpelier, VT 05609
Cell: 802-595-8679
Email: lauren.jandl@vermont.gov
Pronouns: she/her/hers

SETTLEMENT AGREEMENT

(AC)

The State of Vermont (the "State") and Christopher Goddard ("Goddard") hereby agree to resolve a complaint arising from Goddard's conduct as a voter in the November 2020 General Election as follows:

WHEREAS, the Vermont Attorney General's Office received notice from the Vermont Secretary of State on November 16, 2020, alleging that Goddard had returned two ballots in the November 3, 2020 General Election.

WHEREAS, the State and Goddard agree that the following facts are true and accurate:


1. On October 19, 2020, Goddard signed a "General Election Voted Ballot Envelope," which he returned to the Burlington City Clerk's Office with a ballot to be counted in the November 3, 2020 General Election.
2. On November 3, 2020, Goddard appeared in person at the polling place for Ward 7 in Burlington.
3. Goddard was told by the Ward 7 clerk that records indicated he had already cast an absentee ballot. Goddard asserted that he had not.
4. The Ward 7 clerk gave Goddard a provisional ballot, a provisional ballot envelope, and an "Affidavit of No Ballot Cast."
5. Goddard filled out the "Affidavit of No Ballot Cast," which stated as follows:
I, Chris Goddard, do hereby swear/affirm that I have not returned any ballot previously issued to me, nor have I otherwise cast a ballot in the November 3, 2020 Vermont General Election
Subscribed and sworn to this 3 day of Nov., 2020.
6. Goddard signed the affidavit and the provisional ballot envelope and placed the provisional ballot, which remained blank, inside the envelope. He returned all items to the Ward 7 clerk.
7. 17 V.S.A. § 2556(c) provides: "A provisional voter who makes a false statement in completing the attestation, knowing the statement to be false, shall be subject to the penalties of perjury as provided in 13 V.S.A. chapter 65."
8. 17 V.S.A. § 1971 provides: "A legal voter who knowingly casts more than one ballot at any one time of balloting for the same office shall be fined not more than \$1,000.00 if the offense is committed at a primary or general election, and not more than \$100.00 if committed at a local election."
9. The Affidavit of No Ballot Cast cites and quotes 13 V.S.A. § 2901, punishment for perjury, and 17 V.S.A. § 1971, casting more than one ballot, below the signature line.

WHEREFORE, the State and Goddard agree to settle this matter by taking the following actions:

- A. Goddard agrees to pay \$400 to the State as a civil penalty within (30) days of the signing of this Settlement Agreement.
- B. The State covenants and agrees not to sue, or file a complaint or other charge (civil or criminal), or seek any other legal or administrative enforcement action against Goddard for the activities described above.

Dated in Burlington, Vermont this 9th day of Feb. 2021

STATE OF VERMONT
THOMAS J. DONOVAN, JR.
ATTORNEY GENERAL


Eleanor L.P. Spottswood
Assistant Attorney General

Dated in Grand Isle, Vermont this 3 day of Feb, 2021. CAG

~~CHRISTOPHER~~ GODDARD



~~Christopher~~ Goddard
Burlington, Vermont

CAG

Approved as to form:



Christopher Davis
Langrock, Sperry, & Wool
210 College Street
PO Box 721
Burlington VT 05402-0721

Attorney for ~~Christopher~~ Goddard

CAG

CHRIS A. GODDARD

[Redacted]

[Redacted]

02/03/21

Date

Pay to the Order of State of Vermont

\$ 400.00

Four hundred and

00
00

Dollars

Photo Safe Deposit Details on back

[Redacted]

[Redacted]

For Settlement Agreement

[Redacted]

MP