From: Stephanie Greenlees < sgreenlees@kaplanlawvt.com>

Sent: Wednesday, April 14, 2021 2:07 PM **To:** Clark, Charity < Charity . Clark@vermont.gov>

Subject: RE: Public records request

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Hello Charity:

I hope this email finds you well. I reviewed the 12/14/2020 St. Joseph's Orphanage Task Force Investigation Report and compiled a list of documents/records for my office's public records request relating to the St. Joseph's Orphanage Investigation(s). The list is attached hereto. Aside from the first bullet item listed therein, the records were are requesting are all cited in the St. Joseph's Orphanage Task Force Investigation Report and the attached list references the specific page of the report that each such record is cited. Please let me know your estimate of the cost to produce these records and if you have any suggestions as to how I can narrow the request / lower the cost.

Please let me know if you have any questions. Thank you.

Stephanie

Stephanie M. Greenlees, Esq.

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Public Records Request Re: St. Joseph's Orphanage Investigation 04/14/2021

- Michael McGrath's resident file from St. Joe's Orphanage, any DCF records regarding him, and any other records concerning Mr. McGrath that were obtained from the Diocese and/or during your investigation
- Resident Ledgers 1969-1974 (pg. 6)
- Report by DCF Re: Task Force's Investigation (pg. 18)
- Ledger by Sisters of Providence of children placed at St. Joe's between 1970-1974 (p. 22)
- Records of child reports of abuse between 1970-1974 held by VT Catholic Charities (p. 22)
- 2002 Diocese list of 20 Priests accused of sexual misconduct (p. 28)
- AGO Letters to Diocese re: 2002 Diocese list of 20 Priests accused of sexual misconduct (p. 28)
- All complaints of sexual misconduct against living priests produced by Diocese in Feb. 2003 (p. 28)
- DCF files for victims who reported abuse at St. Joe's between 1965-1974 (p. 33)
- Re: Victim ("V") 1
 - O V1 Orphanage resident file, statement, interview (p. 44)
 - o Identity of Sisters 1, 4, 2 and 5 & Counselors 1, 2, and 3 (p.47)
 - St. Joseph's Children's Center Chronicles (p. 50)
 - o Father1a's file (p. 50)
 - o Sister 1a's deposition (p. 51, FN 5)
 - Doc confirming Sister2's presence (p. 52)
 - o Sister3a's deposition (p. 43, FN 16)
 - o Docs Re: Sister5a's presence from 1967-74 (p. 59)
- Re: V9
 - o V9 resident file, statement and interview (p.75)
 - o Sister7's identity (p. 77)
- Re: V12
 - St. Joseph's Child Center Chronicles re: Christmas 1970 visit with Bishop 2a (p. 94)
 - Monsignor 1a file and bio (p. 95)
 - o News Article Re: Bishop 1a and Monsignor 1a aware of abuse at Orphanage (p. 96)
- Re: V13
 - o V13's Orphanage resident file, statement, interview (p. 96)
 - St. Joe's Child Center Chronicles from 1970-1971 re: group of children attempted to run away in 1971 (p. 100, FN47)
- V14 Orphanage resident file, statement, and interview (p. 101)
- Re: V16
 - o V16 written statement (p. 109) and video deposition (p. 111, FN58)
 - o Sister11b's Identity and documentation confirming her presence at Orphanage (p.112, FN61)
- Re: V17
 - o Father 3's file and letter (p. 118, FN63)
 - Sister11a's Identity and documentation of her presence at Orphanage (p. 119, FN65)

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- Re: V18 Identity of Sister15a, Sister15b (p. 127) and Sister11b (p.128)
- Re: V20
 - o V20 statement and interview (p. 137)
 - o Identity of Father4 and Father5 (p. 139)
 - o Identity of SocialWorker2 (p. 140)
 - o Identity of Father5a and Father5b (p. 142)
 - Litigation File Re: V20 v. Diocese, VT Catholic Charities, Orphanage and Sisters of Providence (p. 142)
 - o Father 4a's Deposition (p. 143, FN 107)
 - o Sister20 deposition (p. 143, FN 109)
 - o SocialWorker1a's affidavit dated 8/28/1999 (p. 144, FN 116)
 - o St. Joseph's Child Center Chronicles December 1970 (p. 144, FN118)
 - o Sister24 Identity (p. 146, FN121)
 - o Sister2a deposition (p. 146, FN 124)
- Re: V29
 - o Father8's file from Diocese (p. 179, FN 151)
 - o Father8's Deposition (p. 181, FN154)
 - o Resident 43's Deposition (p. 181, FN154)
- V36 6/24/19 interview with law enforcement (p. 191)
- Re: V41
 - o Monsignor2 Identity (p. 204)
 - o V41 Resident File (p. 205, FN158)
- Re: V44
 - o Sister33 Identity (p. 213)
 - o Sister 20a's Deposition (p. 213, FN 167)
- Re: V48
 - o Sister35 identity and documentation of her presence at Orphanage in 1973 (p. 223, FN 177)
 - o Identity of Sisters 38 and 39 and documentation of their presence at orphanage (p. 227 and FN179)
 - o Father9 Identity (p. 227)
 - o Both of Sister2a's depositions (p. 228, FN180 & 183)
- Re: Appendix 6-Amended DCF Report to Vermont AG dated 10/20/20
 - VT Attorney General's 8/2/19 amended list of names of 132 children placed at St. Joseph's Orphanage (p.3)
 - o Appx. 1: St. Joseph's Child Center Licensing Records, reports, documentation, letters and memos from 10/29/69, 12/31/69, Nov. 1970, Oct. 1971, Oct. 1972, Oct. 1973, Nov. 1974 (p. 6-9)