

**From:** [Jesse Kelaidis](#)  
**To:** [AGO - Info](#)  
**Subject:** Vermont Public Records Act Request | Denials of Insurance Coverage  
**Date:** Wednesday, June 16, 2021 5:51:09 PM  
**Attachments:** [image001.png](#)  
[2021-06-16 - Insurance Denials PRR - VT AG.pdf](#)

---

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

Good Afternoon:

Attached please find a formal letter requesting the production of public records. Please contact me with questions or concerns.

Thank you,

Jesse C. Kelaidis  
Legal Assistant  
[jessek@turkestrauss.com](mailto:jessek@turkestrauss.com)  
Phone: 608.237.1775 | Fax: 608.509.4423 | Direct: 608.441.7380  
Madison 613 Williamson Street #201 | Madison, WI 53703  
[www.turkestrauss.com](http://www.turkestrauss.com)

---

Turke & Strauss LLP

The information contained in this message is confidential and intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this message and then deleting this message from your computer.

---

# Turke & Strauss LLP

Jesse Kelaidis

June 16, 2021

**VIA EMAIL**

Vermont Office of the Attorney General  
Attn: Public Records Custodian  
109 State Street  
Montpelier, VT 05609  
ago.info@vermont.gov

**Re: Vermont Public Records Act Request | Denials of Insurance Coverage**

Dear Public Records Custodian:

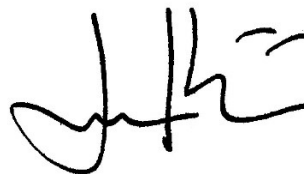
I write to request copies of consumer complaints that regard instances of Life and Health Insurance being denied to consumers. Relevant complaints are limited to those received between December 1, 2019 and June 16, 2021.

If a search for these complaints has more than one hundred results, please narrow the production to instances in which the denial of coverage was due to a mistake in the medical history report used by the insurer to determine if they will provide coverage. For example, an ideal complaint would describe being denied life or health insurance coverage due to a medical condition that the consumer does not in fact have.

If possible, please produce the records electronically, via email to [jessek@turkestrauss.com](mailto:jessek@turkestrauss.com), on a CD, or on a Flash Drive. We are willing to pay all reasonable costs associated with the production of records; please contact me if the fee to produce the records will exceed \$100.00.

Should you have any questions, please contact me at (608) 237-1775 or [jessek@turkestrauss.com](mailto:jessek@turkestrauss.com).

Very truly yours,  
TURKE & STRAUSS LLP



Jesse Kelaidis, Legal Assistant