

From: 115351-41299230@requests.muckrock.com
To: [AGO - Info](#)
Subject: Vermont Public Records Act Request: Geolocation data providers (Office of the Attorney General - Vermont)
Date: Friday, July 9, 2021 11:36:41 AM

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

Office of the Attorney General - Vermont
PRA Office
109 State Street
Montpelier, VT 05609-1001

July 9, 2021

To Whom It May Concern:

The Electronic Frontier Foundation (EFF) seeks records describing the relationship between your agency and third-party providers of geolocation data. In particular, we seek records related to:

- the location data provider Gravy Analytics and its subsidiary Venntel
- Babel Street's service Locate X.

For the purposes of this request, the term "geolocation data" refers to GPS data acquired from cell phone apps, connected vehicles, or other connected devices, or from third-party aggregators of such data, which pertains to the location of individual persons or devices, whether identified or de-identified.

We request the following records for the period between January 1, 2015 and the present:

- All contracts or written agreements between Office of the Attorney General - Vermont, or consultants thereof, and Gravy Analytics, Venntel, or Babel Street;
- All presentations, marketing materials, or proposals by contractors, subcontractors, or consultants working with Office of the Attorney General - Vermont relating to the use of geolocation data from Gravy Analytics, Venntel, or Babel Street;
- All technical documentation, guides, presentations, or policies describing access to, storage of, or use of geolocation data acquired from Gravy Analytics, Venntel, or Babel Street;
- All privacy policies, memoranda of understanding, data-sharing agreements, or terms of use applying to geolocation data acquired from Gravy Analytics, Venntel, or Babel Street;
- All written communications, emails, and attachments between Office of the Attorney General - Vermont and Gravy Analytics, Venntel, or Babel Street;
- All written communications, emails, and attachments between Office of the Attorney General - Vermont and INRIX.

If your office or agency contracts with a company not named here for geolocation data, provision of the alternate organization and equivalent responsive materials would be greatly appreciated.

The requested documents will be made available to the general public. This request is being made in the public interest and is not being made for commercial purposes.

In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Sincerely,

Beryl Lipton
Investigative Researcher, Electronic Frontier Foundation
beryl.lipton@eff.org

View request history, upload responsive documents, and report problems here:

<https://accounts.muckrock.com/accounts/login/>

next=https://accounts.muckrock.com/accounts/login/?next=https%3A%2F%2Fwww.muckrock.com%2Faccounts%2Flogin%2F%3Fnext%3D%252Faccounts%252Fagency_login%252Foffice-attorney-general-4027%252Fgeolocation-data-providers-office-of-the-attorney-general-vermont-115351%252F%253Femail%253Dago.info%252540vermont.gov&url_auth_token=AAAKGX2t6m1rC94x4raw_Tbqkqo%3A1m1sYA%3AlygL6X1i0euSXVFPYXwHCL72lo4

Filed via MuckRock.com

E-mail (Preferred): 115351-41299230@requests.muckrock.com

For mailed responses, please address (see note):

MuckRock News
DEPT MR 115351
411A Highland Ave
Somerville, MA 02144-2516

PLEASE NOTE: This request was filed by a MuckRock staff reporter. Also note that improperly addressed (i.e., with the requester's name rather than "MuckRock News" and the department number) requests might be returned as undeliverable.