

From: Anne Galloway <agalloway@vtdigger.org>

Date: March 28, 2022 at 4:39:33 PM EDT

To: "Donovan, Thomas" <Thomas.Donovan@vermont.gov>, "Clark, Charity" <Charity.Clark@vermont.gov>

Subject: Request for documents referenced in IRS and FBI summaries

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

Dear Vermont Attorney General Donovan:

Please find attached a request for documents referenced in IRS and FBI summaries.

Thanks,
Anne

Anne Galloway
Editor-in-Chief of VTDigger.org and Executive Director of the Vermont Journalism Trust
cell 802-595-9159

Dear Attorney General T.J. Donovan,

Pursuant to Vermont's Public Records Act, 1 VSA §§ 315–20, I am seeking copies of the following public records on behalf of the Vermont Journalism Trust:

Any and all documents referenced in the following Federal Bureau of Investigation and Internal Revenue Service summaries of interviews, which were unsealed in *U.S. v. Quiros*, 5:19-cr-00076-gwc (D. Vt.), on Jan. 28, 2022, including (with Bates numbers where available):

1. James Candido (interviewed 09/09/19; summary filed on 10/01/19)
 - a. DIGGERPRA-ACCD0638
 - b. DIGGERPRA-ACCD0621
 - c. DIGGERPRA-ACCD0658
 - d. MIG-R-DSC-00028321
 - e. EJC-00018802
 - f. DIGGERPRA-ACCD0058
 - g. DIGGERPRA-ACCD0333
 - h. 5138275
2. Susan Donegan (interviewed on 01/25/19; summary filed on 03/01/19)
 - a. USAO-EXEC00025282 – USAO-EXEC00025284
 - b. 5334649 – 5334650
 - c. 000745 – 000746
 - d. USAO-DFR00129543 – USAO-DFR00129545
 - e. 5335317 – 5335321
 - f. 5336281
 - g. 5744074.03
 - h. USAO-DFR00102319 – USAO-DFR00102320
 - i. USAO-DFR00102385
 - j. 5020365
 - k. USAO-EXEC00022521
 - l. 5379819 – 5379821
 - m. 5651635 – 5651636
3. Jim Douglas (interviewed on 05/29/19; summary filed on 06/07/19)
 - a. 5552016
 - b. 0166216
 - c. 5455994
 - d. 5010856
 - e. 5381407
 - f. USAO-EXEC00005588
 - g. 0161126
4. John Kessler (interviewed on 06/27/18; summary filed on 08/01/18)
 - a. 5153751 – 5217838
 - b. 2389395 – 0289421
 - c. 5219411
 - d. 5217842
 - e. 5290722 – 5290726

- f. 5265070 – 5265072
 - g. 0161128
 - h. 0161135
 - i. 293956
 - j. 0161131 – 0161134
5. Sara London (interviewed on 01/11/19; summary filed on 02/21/19)
- a. USAO-EXEC00024346
 - b. USAO-EXEC00025555
 - c. USAO-EXEC00025122
 - d. USAO-EXEC00023813
 - e. USAO-EXEC00005752
6. Bill Lofy (interviewed on 06/21/21; summary filed on 06/23/21)
- a. USAO-EXEC00029447
 - b. USAO-EXEC00021559
 - c. USAO-EXEC00027562
 - d. USAO-EXEC00029190
 - e. USAO-EXEC00028730
 - f. USAO-EXEC00028170
 - g. USAO-EXEC00015464
 - h. USAO-EXEC00028025
 - i. USAO-EXEC00027979
 - j. USAO-EXEC00027715
7. Elizabeth Miller (interviewed on 03/14/19; summary filed on 04/19/19)
- a. Brent Raymond's talking points for the September 2013 trip to Asia
 - b. USAO-EXEC00002365
 - c. USAO-EXEC00004539
 - d. USAO-EXEC00026784
 - e. EXEC0004301
 - f. USAO-EXEC00026926
 - g. USAO-EXEC00023236
 - h. USAO-EXEC00027133
 - i. USAO-EXEC000026119
 - j. USAO-EXEC00025122
 - k. Weekly report, dated 2/13/15 from Patricia Moulton to Governor Shumlin
 - l. 5333950
 - m. USAO-EXEC00025555
 - n. USAO-EXEC000013639
8. Lawrence Miller (interviewed on 05/24/19; summary filed on 07/22/19)
- a. ACCD00008267
 - b. ACCD00008274
 - c. 5211981
 - d. ACCD00008249
 - e. 5077437
 - f. ACCD00007006
 - g. 0293862
 - h. ACCD00007217

- i. 5153752
- j. 5153751
- k. ACCD00005218
- l. 5214485
- m. 5216162
- n. 5216742
- o. ACCD00007226
- p. ACCD00007229
- q. ACCD00007242
- r. ACCD00007249
- s. 5217838
- t. MIG-R-E-00514696
- u. MIG-R-E-00514698
- v. 5217956
- w. 5265029
- x. ACCD013945
- y. ACCD013946
- z. ACCD013948
- aa. ACCD00007318
- bb. ACCD00007197
- cc. 5265947
- dd. ACCD00008074
- ee. ACCD013946
- ff. 5267947
- gg. ACCD00007007 – ACCD000070010
- hh. 5287834
- ii. ACCD00008245
- jj. 5279178
- kk. 527964
- ll. ACCD00008247
- mm. 5279891
- nn. ACCD020010
- oo. ACCD00007005
- pp. ACCD00005220
- qq. ACCD00008273
- rr. ACCD00007965
- ss. 5206152
- tt. 5210616
- uu. 5212778
- vv. 5085472
- ww. 5214131
- xx. 5206824
- yy. ACCD00008275
- zz. 5214327

9. Patricia Moulton (interviewed on 12/07/18; summary filed on 12/27/18)
a. ACCD00009417

- b. ACCD00005379
 - c. VT-DFR00058242
 - d. ACCD00005433¹
 - e. ACCD00005462
 - f. 5649210
 - g. ACCD00005173
 - h. ACCD00005189
 - i. ACCD013389
 - j. ACCD00007031
 - k. 0490438
10. Patricia Moulton (interviewed on 06/18/21; summary filed on 06/22/21)
- a. 5768004
 - b. 5290722
 - c. 5746262
 - d. 5746265
 - e. ACCD0008235
 - f. ACCD0008827
 - g. ACCD00008828
 - h. ACCD016514
 - i. USAO-DFR00008697
 - j. ACCD015824
 - k. USAO-DFR00008739
 - l. ACCD00005387
 - m. USAO-DFR00009059
 - n. ACCD013908
 - o. MIG-R-DISC-00007169
 - p. MIG-R-DISC-00046007
 - q. ACCD00007382
 - r. ACCD00005430
 - s. ACCD00005433
 - t. ACCD00005453
 - u. 5767415
 - v. ACCD00005462
 - w. ACCD00007050
 - x. ACCD00005105
 - y. ACCD00007173
 - z. 0493438
 - aa. ACCD015799
 - bb. 5372626
11. Michael Pieciak (interviewed on 11/19/18; summary filed on 11/28/18)
- a. Document containing an accounting of all AnC Bio Vermont spending
 - b. Revised offering memorandum
 - c. USAO-DFR00102016 – USAO-DFR00102018
 - d. USAO-DFR00006709 – USAO-DFR00006711²

¹ Note that this Bates Number is listed with one fewer “0” in the body of summary than at the end.

² The summary lists “DRF” instead of “DFR” for this Bates range, but this appears to be a typo.

- e. ACCD0005173 – ACCD0005189
 - f. USAO-DFR00102319
12. Michael Pieciak (interviewed on 7/24/19; summary file on 8/09/19)
- a. Various Excel workbooks, including two titled “Global Funds Analysis” and “Net Flow to Ultimate Beneficiaries”
 - b. Document labeled “Meeting Between the Department of Financial Regulation and Primmer Piper Eggleston & Cramer PC, January 28, 2015, RED: Primmer comments from meeting”
 - c. Document labeled “INDEX OF DOCUMENTS FOR JANUARY 28, 2015 MEETING WITH DFR”
13. Brent Raymond (interviewed on 01/08/19; summary filed on 03/04/19)
- a. 5251629
 - b. 5219411
 - c. ACCD00006964
 - d. 0289395
 - e. 5217842
 - f. 5217835
 - g. 5153751
 - h. 5153804
 - i. ACCD00005218
 - j. 0161125
 - k. ACCD00007008
 - l. 5265070
 - m. 5289118
 - n. ACCD00005462
 - o. 5649210
 - p. ACCD00005173
 - q. 533874
14. Peter Shumlin (interviewed on 06/17/19; summary filed on 07/22/19)
- a. Document thanking Shumlin for a meet and greet with Stenger.
 - b. Email from Alex MacLean to Quiros, thanking him for the meeting with Shumlin
 - c. Talking points from Raymond
15. Peter Shumlin (interviewed on 04/29/21; summary filed on 05/17/21)
- a. Talking points for the 2013 EB-5 conference
 - b. Text messages between Quiros and Shumlin that were shown to Shumlin, including but not limited to:
 - i. September 22, 2012 text about a potential project
 - ii. November 2012 text regarding Shumlin’s daughter
 - iii. “April 9 – 13 texts, in which a future meeting was mentioned and Shumlin thanked Quiros for a gift”
 - iv. September 14, 2013, text in which Katie sent an article about Menck and in which a comment was made about Stenger.
 - v. October 11, 2013, text from Quiros to Shumlin about Korea situation
 - vi. March 2014 text from Shumlin to Quiros after Quiros got out of hospital
 - vii. “June 7, 2014, text about the Memorandum of Understanding related to Korea”

- viii. December 2014 texts where Shumlin ignored Quiros
 - ix. Texts regarding meeting about Green Mountain Airways, June 6th meeting in New York City and meeting at Shumlin's home on New Year's Day
 - c. Early 2015 email from Stenger about "a conversation he had with Shumlin about pushing Shumlin to release the projects."
16. All other documents received from the Federal Bureau of Investigation, Internal Revenue Service, and U.S. Attorney's Office in connection with the above interviews.

Because this request is in the public interest, I request that you waive any fees for filling it. If fees are assessed, please notify me before proceeding. If, after that conversation, fees are charged, please provide a detailed receipt explaining the purpose of each fee charged.

If some of this material will take longer to provide than other portions, please provide any segments of the requested information as soon as it is available. If this information is available in electronic format, please provide it in that manner. If any or all of the information can be provided by email, please do so.

Please let me know if you have any questions about this request. I trust you will respond to my request for the records within the timeframe set out in 1 VSA § 318.

Should you deny access to any of the records I am requesting, please provide me with a list of those records, cite the specific exemption that applies to each record or portion of the record being withheld and the supporting facts for the withholding, and provide a description of the material that has been withheld as required by 1 VSA § 318(b)(2).

If a record has a portion that is exempt from disclosure, 1 VSA § 318(e) requires that only the exempt portion be redacted, and that a copy of the rest of the document be released, together with a notation of the specific exemption that applies to the portion withheld.

If you determine that any record is exempt from disclosure, in whole or in part, please also indicate the name and title of the person responsible for the denial, as 1 VSA § 318(b)(2) requires, inform me of the appeal procedures available to me, and the name of the person to whom an appeal may be made.

Thank you for your assistance and please contact me with any questions.

Anne Galloway