

From: [J. Kelaidis](#)
To: [AGO - Info](#)
Subject: Vermont Public Records Act Request | Colonial Penn
Date: Tuesday, March 29, 2022 8:22:04 PM
Attachments: [image001.png](#)
[2022-03-29 - Colonial Penn PRR - VT AG.pdf](#)

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

Good evening,

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

Thank you,

Jesse C. Kelaidis
Legal Assistant
kelaidisj@turkestrauss.com
Phone: 608.237.1775 | Fax: 608.509.4423 |
Madison 613 Williamson Street #201 | Madison, WI 53703
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
kelaidisj@turkestrauss.com

March 29, 2022

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 | Colonial Penn

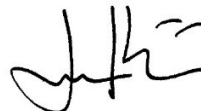
Dear Public Records Custodian:

I write to request copies of consumer complaints regarding Colonial Penn. Relevant complaints are limited to those received between April 1, 2018 and March 15, 2022. If possible, please restrict the production to complaints regarding life insurance products; we're specifically interested in complaints regarding whole life and endowment life insurance policies.

In order to reduce the burden of production, we are only requesting the initial complaint received from the consumer (e.g., cover page & complaint description); we are not seeking any related documents unless eliminating attached and/or associated documents would increase the burden of production.

If possible, please produce the records electronically, via email to kelaidisj@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 \$50.00. Should you have any questions, please contact me at (608) 237-1775 or kelaidisj@turkestrauss.com.

Very truly yours,
TURKE & STRAUSS LLP



Jesse Kelaidis, Legal Assistant