

VARNUM LLP v. UNITED STATES DEPARTMENT OF LABOR

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

EXHIBIT 1



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February 8, 2018

via Fax--859-578-4688
Employee Benefits Security Administration
FOIA Officer
Cincinnati Regional Office
1885 Dixie Hwy, Ste 210
Ft. Wright, KY 41011-2664

via Fax--312-353-5698
Office of the Solicitor
FOIA Officer
Federal Office Building
230 South Dearborn Street, Room 844
Chicago, IL 60604-1502

Re: **Revised FOIA Request**

Dear FOIA Officer(s) :

As follow-up to my conversation with Travis Gosselin (Office of the Solicitor, Chicago Office) today, this serves as a revision to my Freedom of Information Act ("FOIA") request of February 6, 2018, in order to narrow the scope of my previous request. Specifically, this letter is to request that your offices provide us with a copy of any and all actual settlement agreement, consent order, or similar settlement document of claims/enforcement related to Blue Cross Blue Shield Michigan (BCBSM) in the past five years, evidencing resolution of the investigation/dispute. This request is directed to the matter involving BCBSM that was under investigation by Craig Faulkner. This includes agreements between BCBSM and other parties or the Department of Labor. Furthermore, we would like to receive a copy of , if it exists, any list of companies that BCBSM was suggested to communicate or settle with to resolve this matter.

All of the documents mentioned are believed to be publicly available and within the custody and control of your office. In the event that access is denied to any part of the requested documents, please prepare an index and describe the deleted materials in detail, further specifying the statutory basis for the denial and your reasons for believing that the alleged statutory justification applies in this instance. Should you determine that some portions of any of the requested documents are exempt, please provide a copy of the remainder of the documents involved. In the event there are costs for locating the requested documents or reproducing them, such reasonable costs will be paid. However, please contact the undersigned prior to commencement of the search and copy activities if the reasonable costs for such are anticipated to be in excess of One Hundred Dollars (\$100.00). Thank you for your anticipated cooperation with this matter. Should you have any questions or if I can be of further assistance, please feel free to contact me.

Sincerely yours,

VARNUM

A handwritten signature in cursive script that reads "Laura Harner". Below the signature, the name "Laura J. Harner" and the title "Paralegal" are printed in a standard sans-serif font.
Laura J. Harner
Paralegal