

PATRICIA MORGAN

v.

PETER F. KILMARTIN, in his official  
capacity as Attorney General of the State of  
Rhode Island

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KC-2018-0473

**STATEMENT OF AMICUS CURIAE**  
**AMERICAN CIVIL LIBERTIES UNION OF RHODE ISLAND**  
**IN SUPPORT OF OBJECTION TO ENTRY OF FINAL JUDGMENT**

Amicus curiae American Civil Liberties Union of Rhode Island (ACLU of RI) submits this statement in response to the Proposed Order and Proposed Entry of Final Judgment submitted by Defendant Attorney General on December 31, 2018. Amicus believes both that Entry of Final Judgment is premature and inappropriate, and that new information warrants the Court's reconsideration of its ruling on October 15, 2018 upholding in their entirety all redactions made by the Attorney General to the documents previously provided to Plaintiff. That new information discloses that the rationale offered by the Defendant Attorney General for at least some of those redactions is invalid, contrary to the policy of at least one other state agency, and inconsistently applied by the Defendant, who has provided some of the same documents, without redactions, to the ACLU of RI in response to its separate APRA request.

**Prior Proceedings**

On May 7, 2018, Patricia Morgan ("Morgan"), a pro se plaintiff, commenced an action with a document styled "Declaratory Judgement" against the Attorney General in order to obtain records pursuant to the Access to Public Records Act, R.I.Gen.Laws chapter 38-2 ("APRA"), relating to the expenditure of moneys recovered by the Attorney General as part of the "Google

settlement” and to obtain a waiver of fees associated with the production. At the time of commencement of the action, the Attorney General had produced an excel spreadsheet and seven letters from the Attorney General to the Department of Justice.

At hearing on August 14, 2018, this Court denied Morgan’s request for a fee waiver without prejudice, and Morgan tendered a fee in excess of \$3,500.00. The Attorney General provided a substantial number of pages of documents, many with redactions. At the same time, it was undisputed that the Attorney General had not provided documents spanning the entire time period requested by Morgan.

At the August 14, 2018 hearing, the Court made clear that Morgan needed to clarify her request. Morgan thereafter refined her request. Facing a charge of at least \$4,000 more for the balance of the documents, Morgan again sought relief from the Court in connection with her APRA request, including a request for fee waiver for production of the balance of the documents, prohibition of the continued use of excessive redactions, and production of documents previously produced without the challenged redactions.

The Court held a further hearing on October 4, 2018 and reserved decision. The ACLU of RI was granted leave to appear as *amicus curiae* and filed a memorandum in support of Morgan’s position.

The Court issued a decision on the pending issues at hearing on October 15, 2018, granting in part and denying in part Morgan’s request for relief. The Court identified categories of documents that remained to be produced. In its proposed order, the Attorney General has listed what it believes are the categories of documents directed to be produced, while Morgan, in her

email to the Court of January 1, 2019 (copy attached as Exhibit A), has objected to the Attorney General's description as incomplete.<sup>1</sup>

The Court further granted Morgan's request for waiver of any additional fees in connection with the remaining production authorized by the Court. The Court denied Morgan's request to obtain previously redacted documents without redaction or to recoup some or all of the fee previously tendered.

The Court made clear that, in ordering further production without additional fee, it had not passed upon, and was not passing upon, the determination as to whether outstanding documents to be provided were "public records" or subject to an exemption, in whole or in part, including additional redactions, leaving that consideration to the Attorney General as the producing agency.

No order was submitted for entry at the time. On December 31, 2018, apparently simultaneous with production of additional documents, the Attorney General submitted both a proposed Order purportedly embodying the Court's ruling *and* a proposed Final Judgment, with no content other than purporting to conclude the case. On January 1, 2019, Morgan filed, in an email to the Court, what amounts to an objection to the Attorney General's proposed Order and proposed Judgment.

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<sup>1</sup> The Attorney General has listed the following categories: "a. RFPs and contracts funded by the Google Settlement; b. needs assessment reports for purchases made with Google Settlement funds; and c. correspondences with the United States Department of Justice concerning requests to expend Google Settlement funds." Morgan asserts that the list contained in the proposed order is incomplete, reciting that the Court directed production of: "All Invoices and related correspondence[;] All RFPs and related correspondence [;] All requests made to the US Department of Justice and related correspondence [;] All bids and contracts and related correspondence [;] All needs assessments and related correspondence." Amicus respectfully submits that a review of the transcript of proceedings on October 15, 2018, should be conducted, given the lengthy passage of time, before any order is finalized.

As Morgan’s email makes clear, as of January 1, 2019, she had yet to receive any documents pursuant to the Court’s ruling of October 15, 2018. It appears that the Attorney General forwarded documents to Morgan contemporaneously with its submission of a proposed Order and a proposed Final Judgment and is now advocating that final judgment should enter upon fulfillment of that task. In her email of January 1, 2019, Morgan has made clear that she disputes that approach—that the matter is not concluded.

Amicus agrees. This matter has not concluded. In support of that objection, Amicus ACLU of RI respectfully submits first, that entry of any final judgment at this time is inappropriate and premature, and second, that the final judgment proposed by the Attorney General is substantively devoid of content and incorrect.

First, Rule 54(b) of the Superior Court Rules of Civil Procedure makes clear that judgment should not enter upon a decision “which adjudicates fewer than all the claims or the rights and liabilities of...all the parties” without an express direction from the Court for the entry of final judgment. *See, e.g., Nowicki v. Ocean States Bikes, Inc.*, 673 A.2d 48 (R.I. 1996). Amicus respectfully submits that Morgan’s case cannot be considered concluded while a dispute remains as to whether the Attorney General has complied with the Court’s ruling and with the APRA. While the Court quite properly left the initial decision to the Attorney General to determine which records within its description were “public” and which may be exempt in whole or in part, the Court did not purport to abdicate all responsibility—nor would APRA permit it to do so—to review that determination in the event of a dispute. At the time of submission of the proposed Final Judgment, Morgan had not even had an opportunity to review the additional production, since it was apparently placed in the mail simultaneously with the electronic submission of the proposed Order and proposed Final Judgment.

APRA does not give agencies unbridled and unreviewable discretion to determine which records are “public.” To the contrary, exemptions to APRA should be narrowly construed. *Providence Journal Co. v. Pine*, 1998 WL 356904 (R.I. Super. 1998). As the Supreme Court stated in *Downey v. Carcieri*, 996 A.2d 1144 (R.I. 2010), the “Court has long recognized that the underlying policy of the APRA favors the free flow and disclosure of information to the public.” 996 A.2d at 1151 (internal quotations omitted), *quoting In re New England Gas Co.*, 842 A.2d 545, 551 (R.I. 2004), *quoting Providence Journal v. Sundlun*, 616 A.2d 1131, 1134 (R.I. 1992).

Morgan has been provided absolutely no time to review additional, long-awaited production which has been characterized by the Attorney General as too voluminous and too large to transmit by email. There may well be disputed issues, as there were previously, with decisions by the Attorney General regarding the withholding or redacting of documents. Accordingly, this matter is not ripe for entry of judgment.

Second, even if this matter were ripe for entry of final judgment, the form of judgment proposed by the Attorney General does not conform to the requirements of Rule 58 of the Superior Court Rules of Civil Procedure. Rule 58, which is modeled on the corresponding Rule 58 of the Federal Rules of Civil Procedure, I Kent, et al., Rhode Island Civil and Appellate Procedure §58:5 at 539 (2017-18 edition), requires the entry of a separate document which contains the substance of the court’s ruling. “The judgment should state what relief is awarded and indicate on what it is based, i.e., whether it is rendered upon a jury verdict, a decision by the court, or a granted motion for summary judgment.” Kent, §58:1 at 537. An order which states merely that “Final Judgment is entered”, as proposed by the Attorney General, fails to fulfill those requirements.

We have held many times that judgments must provide relief and must not stop with reciting that motions were granted or denied—indeed that it is inappropriate for a judgment to refer to motions at all. See, e.g., *Otis v. Chicago*, 29 F.3d 1159, 1163 (7th Cir. 1994) (en banc) (“[The judgment] should be a self-contained

document, saying who has won and what relief has been awarded, but omitting the reasons for this disposition, which should appear in the court's opinion.”). See also Fed. R. Civ. P. 54(a) (“A judgment should not include recitals of pleadings ... or a record of prior proceedings.”). This document transgresses almost every rule applicable to judgments.

Cooke v. Jackson Nat'l Life Ins. Co., 882 F.3d 630, 631 (7th Cir. 2018).

### **Reconsideration of the Court’s Earlier Ruling May Be Appropriate**

Amicus would also suggest to the Court that, in addition to potential disputes concerning withholding of new documents which are not deemed “public” or the release of additional records which are the subject of extensive and disputed redaction, it is anticipated that Morgan will seek reconsideration, at least in part, of the Court’s earlier decision upholding redactions to the earlier production in light of new information refuting the justifications offered by the Attorney General for at least some of those redactions.

After this Court’s ruling of October 15, 2018, upholding, among other things, the redaction of all identifying numbers for purchase orders and complete text of any “memorandum,” the ACLU of RI filed a separate APRA request with the Department of Administration (DOA) seeking information regarding one of those memoranda, titled “Purchase Order for Lapel Pins and Challenge Coins for the Attorney General's Department,” and the accompanying invoice. Exhibit B hereto.

In response, consistent with its stated policy of requesting identifying numbers to locate bid-related documents, which protocol was noted by Amicus in its earlier brief to the Court, DOA advised Amicus that it could not comply with the request in the absence of that numerical information. Exhibit B.

The ACLU of RI then filed an APRA request with the Attorney General seeking the same documents. Exhibit C hereto. In response, the Attorney General produced the documents, without any of the redactions that appeared in the comparable documents produced to Morgan. Exhibit C.

Amicus respectfully submits that Morgan was entirely correct in her argument that the memorandum should have been produced and should not have been subject to the excessive redactions undertaken by the Attorney General, and that purchase order numbers should similarly have been produced.

The release by the Attorney General of these unredacted documents, along with DOA's response to Amicus that it would not be able to find the requested document in the absence of an invoice or purchase order number, demonstrates not only that the Attorney General's stated security rationale for redacting those numbers was invalid, but that the redactions are inconsistent with DOA's own process for finding documents that are indisputably public records under APRA.

Further, as previously explained by Morgan and Amicus, the lack of bid and order numbers imposes a significant barrier to matching documents and purchases with their related invoices. Amicus submits that these new revelations provide an appropriate basis for the Court's reconsideration of its earlier decision regarding redactions.

### **Conclusion**

In conclusion, Amicus urges the Court to reject as premature the entry of a Final Judgment in this matter. In addition, as a result of new information obtained by Amicus following the Court's October 15 order, Amicus believes that reconsideration of the Court's earlier decision upholding every redaction made by the Attorney General is in order. Further, in light of the Attorney General's inappropriately heavy hand in redaction, the Court should direct the Attorney General to reproduce, at no additional expense to Morgan, the records previously produced, but without

redactions of invoice and purchase order numbers or documents labeled as memoranda, and, finally, the Court should direct the return to Morgan of some or all of the fee previously tendered by her.

Respectfully submitted,

/s/ Lynette Labinger  
Lynette Labinger #1645  
128 Dorrance St., Box 710  
(401) 465-9565  
ll@labingerlaw.com

Cooperating Counsel,  
American Civil Liberties Union Foundation  
of Rhode Island

### **CERTIFICATE OF SERVICE**

I hereby certify that, on January 3, 2019:

- ☒ I electronically filed and served this document through the electronic filing system.
- ☒ The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.
- ☒ I further certify that a copy has been sent via e-mail and first-class mail, postage prepaid, to:  
Patricia L. Morgan  
411 Wakefield St.  
West Warwick, RI 02893  
Pmorgan14@cox.net

/s/ Lynette Labinger



**From:** pmorgan14@cox.net <pmorgan14@cox.net>  
**Sent:** Tuesday, January 1, 2019 8:59 AM  
**To:** mlong@courts.ri.gov  
**Cc:** Karen Ragosta <kragosta@riag.ri.gov>; 'Michael Field' <MField@riag.ri.gov>; Steven Brown <sbrown@riaclu.org>; Lynette Labinger <ll@labingerlaw.com>  
**Subject:** RE: Morgan v. Kilmartin

Dear Judge Long,

The order/letter attached to the Attorney General's email does not reflect what you agreed the Attorney General's office would deliver to me.

We agreed that they would produce:

- All Invoices and related correspondence
- All RFPs and related correspondence
- All requests made to the US Department of Justice and related correspondence
- All bids and contracts and related correspondence
- All needs assessments and related correspondence

I have waited for nearly three months for them to produce the documents you ordered them to retrieve and make available. In fact, On November 8, 2018, I sent an email to you and Attorney Fields inquiring about the lack of not only production, but any communication of progress. I was told that they were working to supply the documents.

Clearly, they have not. Instead, I am faced again with obstruction. I have not received the documents and the related correspondence in all the above categories. The correspondence is a vital part of my inquiry.

The order sent by the Attorney General's office does not faithfully record the ruling that you made at our hearing before you. I fear it is another attempt to avoid producing the documents to which I am entitled under the Access to Public Records Act and under your order.

I ask that you not accept this inaccurate and erroneous order, and instead instruct the Attorney General to produce all the documents that you ordered. I also ask that I not be made to wait another 3 months for their production.

Thank you,

Patricia Morgan

EXHIBIT A

**From:** Karen Ragosta <[kragosta@riag.ri.gov](mailto:kragosta@riag.ri.gov)>  
**Sent:** Monday, December 31, 2018 2:35 PM  
**To:** [pmorgan14@cox.net](mailto:pmorgan14@cox.net)  
**Subject:** Morgan v. Kilmartin

Attached please find documents relative to the above matter which are also being mailed out to you today via regular mail.

Thank you.

Karen

**Karen M. Ragosta | Legal Assistant, Civil Division**  
The State of Rhode Island | Office of the Attorney General  
150 South Main Street | Providence, RI - 02903  
Office: +1 401 274 4400 | Ext:2328  
[kragosta@riag.ri.gov](mailto:kragosta@riag.ri.gov) | [www.riag.ri.gov](http://www.riag.ri.gov) |



**Please note: *Starting Monday, July 23, 2018, the Bureau of Criminal Identification (BCI), Consumer Protection Unit, and Diversion Unit will be located at 4 Howard Avenue, Cranston (on the corner of Howard Avenue and Pontiac Avenue). As of that date, all in-person state and/or national background checks will ONLY be available at the 4 Howard Avenue, Cranston location (background checks will NO LONGER be available at the Attorney General's main office in Providence). For more information, please visit [www.riag.ri.gov](http://www.riag.ri.gov) or call 401-274-4400.***

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**From:** [RL.gov Transparency Portal](#)  
**To:** [Majcher, Daniel \(DOA\)](#); [Russolino, Nancy \(DOA\)](#); [Request, APRA \(GOV\)](#); [McIntyre, Nancy \(DOA\)](#); [Stein, Donna \(DOA\)](#); [McCabe, Brenna \(DOA\)](#); [APRA, DOA](#); [Gaddes, Dylan \(DOA\)](#)  
**Subject:** [EXTERNAL] : APRA Request - Executive Branch Agencies: Administration  
**Date:** Tuesday, October 09, 2018 11:49:57 AM

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Name	<u>Steven Brown</u>
How would you like to receive your documents? *	Email
Email *	<a href="mailto:sbrown@riaclu.org">sbrown@riaclu.org</a>
Approximate publish date of record *	Thursday, March 28, 2013
Related Agency? *	Administration
Topic – Dept of Administration	Purchasing
Name and Description of record *	A copy of a March 28, 2013 memorandum from Christopher Cotta, Director of Administration at the Attorney General's Office, to Lorraine Hynes, Department of Administration Purchasing Agent, regarding "Purchase Order for Lapel Pins and Challenge Coins for the Attorney General's Department."
Number of copies requested *	1

EXHIBIT B

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**From:** Majcher, Daniel (DOA) <[Daniel.Majcher@doa.ri.gov](mailto:Daniel.Majcher@doa.ri.gov)>  
**Sent:** Wednesday, November 7, 2018 4:04 PM  
**To:** Steven Brown  
**Cc:** Clarke, Amanda (DOA); McIntyre, Nancy (DOA); Stein, Donna (DOA)  
**Subject:** RE: [EXTERNAL] : Re: APRA Request – CHRISTOPHER COTTA MEMORANDUM

Mr. Brown,

For records back in 2013, we would need a PO number, a bid number or even a vendor name to look up that information and retrieve the contract file. The Division of Purchases (“Division”) forwarded me your attached request and the email chain below. The standard practice would be to keep such a memo in the specific contract file, which again is organized by PO number/Bid number. Please note thousands of files and tens of thousands, if not hundreds of thousands, of procurement records, related to the purchase every good and/or service for the entire executive branch of state government would be involved. Without the PO Number/bid Number or a vendor name to search for the PO #, searching for this memo is like looking for a needle in a haystack.

With the information you have provided, without the PO #, a bid #, or the name of a vendor, I have spoken to the Division, they are unable to locate the memo you are requesting from 2013. Please keep in mind, these records from 2013 are not stored electronically and are in paper files, so the Division is unable to do a keyword search. Back in 2013, the contract file would be in a paper contract file literally organized by Purchase Order/MPA Number. These records may also have been physically sent to the archives. If the Division had the name of the vendor, we could potentially locate the PO number in our system and go from there to locate the contract file. Do you have the name of the vendor or can you get that from the Office of the Attorney General?

Please let me know if you wish to continue the search without this information (vendor name, PO # or bid #) and I will prepare an estimate and request prepayment. Again, if you can get the name of the vendor or the PO #, that would be extremely helpful and would expedite the search significantly.

Please feel free to call me discuss further.

Thanks,  
Dan

Daniel W. Majcher, Esq.  
R.I. Department of Administration  
Legal Services

One Capitol Hill, 4th Fl.  
Providence, RI 02908  
Tel: (401) 222-8880  
Fax: (401) 222-8244

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**From:** Steven Brown <[sbrown@riaclu.org](mailto:sbrown@riaclu.org)>  
**Sent:** Thursday, November 01, 2018 2:04 PM  
**To:** Stein, Donna (DOA) <[donna.stein@purchasing.ri.gov](mailto:donna.stein@purchasing.ri.gov)>  
**Subject:** [EXTERNAL] : Re: APRA Request – CHRISTOPHER COTTA MEMORANDUM

Dear Ms. Stein -

I am following up on my October 26th email to you relating to my APRA request for a Division of Purchasing document.

Since I have not heard back from you in response to that email, I am taking your October 24th email to me as a denial of my APRA request, but I would appreciate some clarification as to the basis for the denial.

Is it the Division's position that it is unable to fulfill any APRA requests relating to purchasing decisions without a purchase order number?

Steven Brown  
Executive Director  
ACLU of Rhode Island  
128 Dorrance Street, Suite 400  
Providence, RI 02903  
401-831-7171 (phone)  
401-831-7175 (fax)

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**From:** Steven Brown  
**Sent:** Friday, October 26, 2018 8:18 AM

**To:** Stein, Donna (DOA)

**Subject:** Re: APRA Request – CHRISTOPHER COTTA MEMORANDUM

Dear Ms. Stein:

Thank you for your response to my APRA request.

While I can appreciate the fact that having a purchase order number might make it easier for you to find the requested document, I'm afraid I cannot give you one. That is because, as ridiculous as it may seem to you and me, the Attorney General has taken the position that purchase order numbers and similar identifying information for purchases are exempt from disclosure under the Access to Public Records Act, and he has refused to disclose them. As a result, your request for such identifying information puts us in a Catch-22 situation.

If it helps, I can tell you that this particular purchase request was made by the Attorney General from the funds his office received from the so-called Google case settlement in 2012.

Since I assume you receive other APRA requests that are not necessarily tied to purchase order numbers (e.g., a request for information about purchases of a certain type over a certain period of time), I trust it is not the Department's position that APRA requests relating to purchases can never be fulfilled if this specific type of identifying information is not provided.

In light of other extremely specific information I have given you about the particular document I am seeking -- the name of the requester and the requestee, the date of the request, and the items being sought for purchase -- I trust that you will be able to fulfill my request, notwithstanding my inability to provide you a specific number or project name (unless indicating that it is Google-related funding is what you were looking for).

Thank you, and I look forward to hearing back from you about this at the earliest opportunity and receiving the requested document.

Steven Brown  
Executive Director  
ACLU of Rhode Island  
128 Dorrance Street, Suite 400  
Providence, RI 02903  
401-831-7171 (phone)  
401-831-7175 (fax)

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**From:** Stein, Donna (DOA) <[Donna.Stein@purchasing.ri.gov](mailto:Donna.Stein@purchasing.ri.gov)>

**Sent:** Wednesday, October 24, 2018 8:32 AM

**To:** Steven Brown

**Subject:** APRA Request – CHRISTOPHER COTTA MEMORANDUM

Good morning,

This e-mail is in response to your request made to the Rhode Island Division of Purchases ("Division") received regarding, "...March 28, 2013 memorandum from Christopher Cotta, Director of Administration at the Attorney General's Office, to Lorraine Hynes." Your request is governed by the Rhode Island Access to Public Records Act ("APRA") contained in R.I. Gen. Laws § 38-2-1 et seq. and § 38-2-2(4)(B).

The Purchasing Agent requests that records you would like to obtain be defined based on one or more of the following: solicitation number, purchase order number(s), vendor name(s), project title, etc., as records cannot be identified and located without additional information.

Thank you,

*Donna Stein*

Standards Technician

Department of Administration

Division of Purchases

One Capitol Hill

Providence, RI 02908

Phone: 401-574-8103

Fax: 401-574-8387

[Donna.stein@purchasing.ri.gov](mailto:Donna.stein@purchasing.ri.gov)

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128 Dorrance Street, Suite 400  
Providence, RI 02903  
Phone: (401) 831-7171  
Fax: (401) 831-7175  
[www.riaclu.org](http://www.riaclu.org)  
[info@riaclu.org](mailto:info@riaclu.org)

November 19, 2018

ATTN: Open Government Unit  
Department of the Attorney General  
150 South Main Street  
Providence, RI 02903  
[aprarequest@riag.ri.gov](mailto:aprarequest@riag.ri.gov)

(by email)

To Whom It May Concern:

Please consider this a formal request pursuant to the Access to Public Records Act (APRA), R.I.G.L. §38-2-1 et seq.

I am writing to obtain copies of the following documents:

(1) A copy of a March 28, 2013 memorandum from Christopher Cotta, Director of Administration of the Attorney General's Office, to Lorraine Hynes, Department of Administration Purchasing Agent, regarding "Purchase Order for Lapel Pins and Challenge Coins for the Attorney General's Department"; and

(2) Any invoices relating to this purchase order.

Upon information and belief, this purchase was made, or sought to be made, from "Google settlement" funds.

The documents can be sent electronically to [sbrown@riaclu.org](mailto:sbrown@riaclu.org).

As provided for by APRA, we are willing to pay reasonable copying costs for the requested records, and I look forward to receiving the documents within ten business days. If you have any questions about this request, I hope you will feel free to let me know.

Thank you in advance for your prompt attention to this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steven Brown".

Steven Brown  
Executive Director

EXHIBIT C



**From:** Sean Lyness <[SLyness@riag.ri.gov](mailto:SLyness@riag.ri.gov)>  
**Sent:** Monday, December 3, 2018 8:43 AM  
**To:** Steven Brown  
**Subject:** Response to November 19, 2018 APRA Request

Dear Mr. Brown:

Attached please find documents responsive to your November 19, 2018 Access to Public Records Act request. The last page of the .pdf is the invoice (category 2), whereas the remaining documents are the requested memorandum (category 1). Because search and retrieval was less than one hour, and because these documents were maintained electronically at the time of your request, there is no charge for processing this request.

If you have any questions, please feel free to contact me.

Thank you very much,

-Sean Lyness

**Sean Lyness**  
**Special Assistant Attorney General, Civil Division**  
The State of Rhode Island | Office of the Attorney General  
150 South Main Street | Providence, RI - 02903  
Office: +1 401 274 4400 | Ext: 2481  
[SLyness@riag.ri.gov](mailto:SLyness@riag.ri.gov) | [www.riag.ri.gov](http://www.riag.ri.gov) |



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*Please note: **Starting Monday, July 23, 2018**, the Bureau of Criminal Identification (BCI), Consumer Protection Unit, and Diversion Unit will be located at 4 Howard Avenue, Cranston (on the corner of Howard Avenue and Pontiac Avenue). As of that date, **all in-person state and/or national background checks will ONLY be available at the 4 Howard Avenue, Cranston location** (background checks will NO LONGER be available at the Attorney General's main office in Providence). For more information, please visit [www.riag.ri.gov](http://www.riag.ri.gov) or call 401-274-4400.*

State of Rhode Island and Providence Plantations  
Department of Attorney General

Inter-Office Memorandum

Date: March 28, 2013

To: Lorraine Hynes, Purchasing Agent  
Department of Administration

From: Christopher Cotta   
Director of Administration

RE: Purchase order for Lapel Pins and Challenge Coins for the Attorney General's Department

Lorraine,

The Attorney General has directed me to purchase challenge coins and lapel pins that he can use in recognition of the numerous individuals, entities and partners with whom we work on a daily basis. As the State's Attorney General, he interacts with all Rhode Island State and Local law enforcement agencies, many agencies with who we interact in the criminal justice system, each of the Attorneys General across the country, and numerous federal agencies with whom we partner.

It is common practice to bestow a token of appreciation for the hard effort these people have put forth to accomplish our mission. When this particular kind of challenge coin or lapel pin is bestowed upon a person, it refers to the acknowledgement of his/her talents and performance. Challenge coins signify the overall excellence and performance of work of that organization. Employees are relegated to the feeling that they have reached heights of success and this helps to enhance their enthusiasm for work and also bring about motivation to let them to work harder. The coins help in a way to boost the overall confidence and morale of any workplace. In simple terms, it is to encourage good behavior among the employees. Just like the challenge coins, the lapel pins have been used for decades to recognize and reward important employees in the various corporate sectors. The employees in an organization are encouraged to collect as many pins as they want and the more number of pins that they collect the more they are in the spotlight.

We have been researching the cost for these types of materials over the past six months or so. They can be manufactured locally but those come at a premium cost. There is nothing on the state's master price agreement that we can use to purchase these materials. I have provided a spread sheet of what we found related to costs for similar coins and pins from four vendors. We asked and received approval from the US Department of Justice, Federal Asset Forfeiture and Money Laundering Section to purchase these materials.

Is it possible to approve this requisition without the need for formal bidding due to the limited number of potential state vendors? We have identified two Rhode Island companies and two national vendors for pricing. We inquired about manufacturing the items in Rhode Island but found the costs to be prohibitive. We would appreciate the approval to process a purchase order to the lowest quoted vendor "All Things Considered Promotions & Supplies Inc" for \$4,600.00 against our Google Forfeiture fund account.

**Quotes received:**

**Lapel Pins** (3/4' round 2mm thick brass pin with butterfly clutch) Quantity 5000

All Things Considered Promotions & Supplies Inc (a Rhode Island vendor)	\$ 0.62/piece	<u>\$ 3,100.00</u> Attachment A
Challenge Coin USA	\$ 0.92/piece	<u>\$ 4,600.00</u> Attachment B1
Ahlers Designs (a Rhode Island vendor)	\$1.59/piece	<u>\$ 7,950.00</u> Attachment C5
Hook-Fast Spec., Inc.	\$ 1.65/piece	\$ 8,250.00 Attachment D2
Die Charge		<u>200.00</u> Attachment D2
Total		<u>\$ 8,450.00</u> Attachment D2

**Challenge Coins** ( 1 3/4" Round 3mm thick ) Quantity 500

All Things Considered Promotions & Supplies Inc	\$ 3.00/piece	<u>\$ 1,500.00</u> Attachment E
Challenge Coin USA	\$ 4.49/piece	\$ 2,245.00 Attachment B1
Die Charge		<u>160.00</u> Attachment B1
Total		<u>\$ 2,405.00</u> Attachment B1
Hook-Fast Spec., Inc.	\$1.65/piece	\$1,950.00 Attachment D2
Die Charge		<u>425.00</u> Attachment D2
Total		<u>\$ 2,375.00</u> Attachment D2
Ahlers Designs	\$9.00/piece	<u>\$ 4,500.00</u> Attachment F6



## All Things Considered Promotions & Supplies, Inc.

521 Roosevelt Avenue, Central Falls, RI 02863


[atcpromos.com](http://atcpromos.com)

### QUOTATION

Issued to:  
Ms. Amy Kempe  
Public Information Officer  
Dept. of Attorney General, RI

Date: 10/17/2012  
Validity: 30 days

We are pleased to submit the following quotation for your consideration.

Description	Quantity	Unit Price (to your door)	Amount
<p><b>Lapel Pin ( 3/4" round, 2mm thick)</b></p> <p><b>Material:</b> Brass with gold plating and soft enamel</p> <p><b>Design Concepts:</b></p> <ol style="list-style-type: none"><li>1. A.G. Logo (see below):</li><li>2. Add golden rims inside &amp; outside of the blue band.</li></ol>  <p><b>Wording:</b></p> <p>Front: Upper Half: ATTORNEY GENERAL Lower Half: STATE OF RHODE ISLAND</p> <p>Back: Upper Half: PETER F. KILMARTIN</p> <p><b>Attachment:</b> Butterfly Pin</p> <p><b>Packaging:</b> each in a small poly bag</p> <p><b>Payment:</b> 50% at order confirmation, balance on delivery</p> <p><b>Lead time:</b> about 3 weeks after sample approval</p>	<b>5,000</b>	<b>\$0.62</b>	<b>\$3,100.00</b>  (Set up and shipping are included)

Thank you for your business

Quoted by: *Victoria Huang*

(A)

## Christopher Cotta

---

**From:** Christopher Cotta  
**Sent:** Tuesday, August 14, 2012 5:59 PM  
**To:** Amy Kempe  
**Subject:** FW: coin quote

---

**From:** Challenge Coin USA [<mailto:jay@challengecoinusa.com>]  
**Sent:** Tuesday, August 14, 2012 3:56 PM  
**To:** Christopher Cotta  
**Subject:** coin quote

Christopher,  
Doing between 500 to 999 coins in 1.75 inches, gold, 2 side color, texture, S&H – per coin @ \$4.49 + \$160 die fee.  
Doing the same @ 1000 coins will be \$4.19 + \$160 die fee  
Doing 5000 – lapel pins will be 0.92 each.

I will also add epoxy to the coins for no additional charges – and will get a 10 inch wall plaque form one side of the coin. You can see samples on this page  
<http://www.challengecoinusa.com/plaques.html>  
Thanks  
Jay

CHALLENGE COIN USA  
P.O.Box 4272  
Sedona, AZ 86340  
Toll Free: 1 - 877 - 5 COIN.4.U (526 4648)  
Tel: 928 - 202 0992  
Fax: 928 - 496 4995  
<http://www.ChallengeCoinUSA.com>  
[Jay@ChallengeCoinUSA.com](mailto:Jay@ChallengeCoinUSA.com)

---

**From:** Christopher Cotta <[CCotta@riag.ri.gov](mailto:CCotta@riag.ri.gov)>  
**Date:** Tuesday, August 14, 2012 12:37 PM  
**To:** Jay Javey <[jay@challengecoinusa.com](mailto:jay@challengecoinusa.com)>

Please see the attached quote and provide me a quotation by tomorrow

Christopher Cotta+  
Director of Administration  
RI Attorney General  
150 South Main Street  
Providence, RI 02903

401-274-4400 ext 2350

[ccotta@riag.ri.gov](mailto:ccotta@riag.ri.gov)

## Christopher Cotta

---

**From:** Christopher Cotta  
**Sent:** Tuesday, August 14, 2012 3:38 PM  
**To:** 'Jay@ChallengeCoinUSA.com'  
**Attachments:** 20120814151149002.pdf

Please see the attached quote and provide me a quotation by tomorrow

Christopher Cotta+  
Director of Administration  
RI Attorney General  
150 South Main Street  
Providence, RI 02903

401-274-4400 ext 2350

[ccotta@riag.ri.gov](mailto:ccotta@riag.ri.gov)

Ahlers Designs The Art of Recognition - Commemorate, Motivate, Celebrate  
1005 Main Street, Studio 707, Pawtucket, RI 02860 PH: 401-365-1010 • FX: 401-365-1333

---



## Project Proposal

Prepared for: **Rhode Island -Office Of The Attorney General**

Prepared by: Gail Ahlers, Artistic Director / CEO

September 12, 2012

Proposal number: RIAG1-lapelpin

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## Company Overview

### Description:

At Ahlers Designs, "the art of recognition" is at the heart of each and every project. We custom design awards and corporate gifts that accentuate each organization's unique culture, message, and mission. We help you show appreciation with class and originality.

### The Art of Recognition can help you:

- reach company or department goals or objectives.
- increase productivity and economic growth.
- recognize outstanding achievements and boost morale.
- strengthen workforce loyalty, dedication, and retention.
- thank board members, shareholders, staff, and volunteers for their efforts.
- motivate members and employees attain greater achievements.
- establish your organization as a valuable and dynamic entity enterprise.

### Design Services and Product Development:

- Design to Manufacturing - Made in the USA.
- Custom Awards and Unique Corporate Gifts.
- Green materials: recycling, reclaiming, repurposing.
- Casting, Fabrication, Fine and Ferrous metals.
- Graphic Design that illustrates your branding.
- Sculpture for Indoor and Outdoor environment.

### The Artist:

Born in the New York area, Gail Ahlers moved to Providence to attend Rhode Island School of Design, where she graduated with a BFA in Light Metals in 1985. After graduating from RISD, she studied art history in Paris and sculpture at the San Miguel de Allende Institute in Mexico.

With her expertise in precious metals and sculpture, Gail bridged her design talent and artistry in 1989 by founding Ahlers Designs, a company dedicated to her passion of bringing joy into people's lives. Gail works closely with clients to ensure that the unique gifts and custom awards she creates are valuable additions to the industries, events, or special occasions at which they will be presented.

### National Certifications:

WBENC - certified Women Owned Business (# 20055108261)

NGLCC - certified National Gay & Lesbian Chamber of Commerce (# 103228)

### State (RI) Certifications:

WBE - Women Owned (#MBCN 1110)

DBE - Disadvantaged (#MBCN 1110)

### NAICS Codes:

332999 (Primary), 332323, 541340, 541430, 541410, 541490, 711510, 423940

### PSC Codes:

9915, 9999, T001

### CAGE:

6R8T1

### Made in USA / Recycled / Reclaimed / Sustainable

## Project Proposal: Lapel Pins

Primary contact:	Secondary contact:
Amy Kempe	Christopher Cotta
(401) 274-4400 x2234	(401) 274-4400
<a href="mailto:akempe@riag.ri.gov">akempe@riag.ri.gov</a>	<a href="mailto:ccotta@riag.ri.gov">ccotta@riag.ri.gov</a>

### Project objective:

Design and produce a Custom Lapel Pin for the Rhode Island Office of Attorney General.

### Design concepts:



### Custom Lapel Pin:

Lapel pin will showcase the Rhode Island Anchor of Hope center stage, around the edge, the office title and state name, as shown. Blue enamel around outer rim, and white in center will be added to enhance design. Personalized engraving on back of pin: Attorney General / Name / Year.

- Size: .75" diameter / clutch back closure
- Finish: Polished with Bright Gold Plating
- Qty: 5000



PH: 401.365.1010 / EM: [gail@ahlersdesigns.com](mailto:gail@ahlersdesigns.com)

**Pricing schedule estimates: Lapel Pins**

**Import Lapel Pin**

Custom Lapel Pin: (Import)	Quantity	Unit Price	Cost
Custom Lapel Pin	2500	\$1.78	\$4,450.00
Free Delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$4,450.00</b>

Custom Lapel Pin: (Import)	Quantity	Unit Price	Cost
Custom Lapel Pin	5000	\$1.59	\$7,950.00
Free Delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$7,950.00</b>

**Domestic Lapel Pin**

Custom Lapel Pin: (Domestic)	Quantity	Unit Price	Cost
Custom Lapel Pin	2500	\$4.39	\$10,975.00
Free Delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$10,975.00</b>

Custom Lapel Pin: (Domestic)	Quantity	Unit Price	Cost
Custom Lapel Pin	5000	\$4.26	\$21,300.00
Free delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$21,300.00</b>

**Delivery date:**

To Be Determined. Ahlers Designs requires 4 to 6 weeks lead time.

(C5)

## Terms of Doing Business

### Procedures:

- All products are sent FOB Pawtucket, RI
- Unless otherwise specified we ship the best way: US Mail, UPS, or carrier.
- Minimum shipping fee, \$15.00.

### Methods:

- Cash, Check, MC, Visa and American Express.

### Program: Custom Projects, Awards, & Corporate Gifts.

- Set-up Fees determined by individual project.
- Payment Schedule:
  - 1/3 deposit (non-refundable) prior to start of project;
  - 2/3 upon final shipment.
  - Custom projects \$1000.00 or less, Invoice must be paid in full.

### Production: Custom Projects, Awards, & Corporate Gifts.

- Initiation of project will not commence until receipt of signed approval form and deposit from client.
- Client will receive a selection of no more than 3 designs / drafts, or client may provide a specific design idea / option to be evaluated by designer as to casting capability.
- Additional designs of extensive graphic alterations will be subject to further design fees.
- Samples (if requested) are generally 2 – 4 weeks after final approval of design/art work, and receipt of deposit.
- Production is generally completed within 4 weeks once samples/art work is approved.

### Contact Information:

Gail Ahlers /Artistic Director, CEO

PH: 401.365.1010

FX: 401.365.1333

email: [gail@ahlersdesigns.com](mailto:gail@ahlersdesigns.com)

email: [operations@ahlersdesigns.com](mailto:operations@ahlersdesigns.com)

### Optional - Public relations:

If requested Ahlers Designs offers the service of press releases for our clients. This is available through PR web. prices ranging from \$150 - \$500. We write the press release and submit with photos of the award and information about your company. We can also submit information through social media channels like Facebook, Twitter, Youtube, etc.



PH: 401.365.1010 / EM: [gail@ahlersdesigns.com](mailto:gail@ahlersdesigns.com)

## Credit Application

**Fax To: 401.365.1333**

Legal Name of Company:	Federal ID:	D&B NO:
Trade Name d.b.a.:	Tax Exempt #	Years In Business:
Billing Address:	Annual Sales:	Est. Monthly Purchases
City, State, Zip:	A/P Contact Fax No:	Nature of Business:
A/P Contact Phone No:	A/P Contact Email Address:	Person to Contact for Payment:

Principles:	
Name and Title:	Social Security No:
Name and Title:	Social Security No:

Bank Information:	
Bank Name:	Account No:
Address:	Contact:

Credit References:	
Company:	Address
Credit Limit:	Account#:
Phone Number:	Contact:
Fax:	Email Address:
Company:	Address:
Credit Limit:	Account#:
Phone Number:	Contact:
Fax:	Email Address:
Company:	Address:
Credit Limit:	Account #:
Phone Number:	Contact:
Fax:	Email Address:

C9

## Christopher Cotta

---

**From:** Christopher Cotta  
**Sent:** Friday, August 17, 2012 10:32 AM  
**To:** Amy Kempe  
**Subject:** FW: Please quote the project attached  
**Attachments:** RI AG Coin back color.jpg; RI-Att-General Coin front color.jpg

Christopher Cotta  
Director of Administration  
Department of Attorney General  
150 South Main Street  
Providence, RI 02878

(401) 274-4400 ext. 2350  
[ccotta@riag.ri.gov](mailto:ccotta@riag.ri.gov)

---

**From:** Daniel Gorriaran [<mailto:dan@hookfast.com>]  
**Sent:** Fri 8/17/2012 10:14 AM  
**To:** Christopher Cotta  
**Subject:** RE: Please quote the project attached

Good Morning Chris,

This is what I had in mind to keep it elegant and very legible. Please let me know if you'd like to see any additional changes.

Thank you,

Daniel Gorriaran  
Hook-Fast Spec., Inc.  
(401)781-4466 ph  
(401) 781-5533 fx  
[www.hookfast.com](http://www.hookfast.com)

---

**From:** Christopher Cotta [<mailto:CCotta@riag.ri.gov>]  
**Sent:** Thursday, August 16, 2012 10:04 AM  
**To:** Daniel Gorriaran  
**Subject:** RE: Please quote the project attached

Daniel,

The Attorney General asked if you could please send us a mock up of the design so he can be comfortable with both the colors and design.

Thanks

Chris Cotta

---

**From:** Daniel Gorriaran [<mailto:dan@hookfast.com>]  
**Sent:** Thursday, August 16, 2012 9:03 AM

**To:** Christopher Cotta  
**Subject:** RE: Please quote the project attached

Chris,

Sorry about that, the pricing I provided for the coin is plain, without enamel. The design we created will be made so it can be enameled or just antique gold plated, like our art. If we add enamel, the unit cost will be \$4.20 @ 500 pieces and \$3.80 each at 1000 pieces. The lapel pin will be the same price either full color enamel or antique gold plated. I suspect the lapel pin will look very nice if we enamel the border only and polish the center detail but leave it bright gold.

Please let me know if you have any further questions or comments.

Thank you,

Daniel Gorriaran  
Hook-Fast Spec., Inc.  
(401)781-4466 ph  
(401) 781-5533 fx  
[www.hookfast.com](http://www.hookfast.com)

---

**From:** Christopher Cotta [<mailto:CCotta@riag.ri.gov>]  
**Sent:** Wednesday, August 15, 2012 4:02 PM  
**To:** Daniel Gorriaran  
**Subject:** RE: Please quote the project attached

Daniel,

I appreciate your response but I'm inquiring about the design I sent to you, specifically the colors and graphics noted as while your design is nice, the General prefers some color as depicted in my attachment. Can you spec the attachment I provided?

Chris

---

**From:** Daniel Gorriaran [<mailto:dan@hookfast.com>]  
**Sent:** Tuesday, August 14, 2012 3:46 PM  
**To:** Christopher Cotta  
**Subject:** RE: Please quote the project attached

Mr. Cotta:

Thank you for your note, I appreciate you following up with us. I had sent a quote a while ago along with the design we prepared when I was discussing with your office months ago. I apologize for not following up sooner making sure the right person received the information.

The one time die charge for the 1.75" coin will be \$425.00 and the unit cost for 500 coins will be \$3.90 each. This unit cost will drop to \$3.55 each at 1000 pieces.

The new die for the 3/4" lapel pin will be \$200.00 and the unit cost at 5000 pieces will be \$1.65 each. We will card and poly bag the pins individually. We can also add a very nice velour box for \$.60 additional.

Production time will be 4 weeks for the first order.

Please let me know if you have any further questions.

Thank you,

Daniel Gorriaran  
Hook-Fast Spec., Inc.  
(401)781-4466 ph  
(401) 781-5533 fx  
[www.hookfast.com](http://www.hookfast.com)

---

**From:** Christopher Cotta [<mailto:CCotta@riag.ri.gov>]

**Sent:** Tuesday, August 14, 2012 3:34 PM

**To:** [customerservice@hookfast.com](mailto:customerservice@hookfast.com)

**Subject:** Please quote the project attached

Please see the attached quote and provide me a quotation by tomorrow

Christopher Cotta+  
Director of Administration  
RI Attorney General  
150 South Main Street  
Providence, RI 02903

401-274-4400 ext 2350

[ccotta@riag.ri.gov](mailto:ccotta@riag.ri.gov)





## All Things Considered Promotions & Supplies, Inc.



521 Roosevelt Avenue, Central Falls, RI 02863  
[atcpromos.com](http://atcpromos.com)

### QUOTATION

Issued to:  
Ms. Amy Kempe  
Public Information Officer  
Dept. of Attorney General, RI

Date: 10/17/2012  
Validity: 30 days

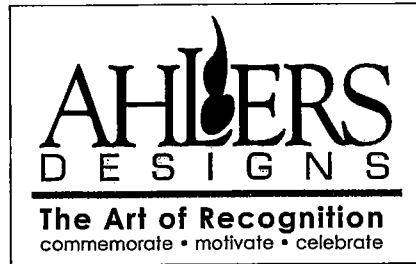
We are pleased to submit the following quotation for your consideration.

Description	Quantity	Unit Price (to your door)	Amount
<b>Challenge Coin (1 3/4" round, 3mm thick)</b>  <b>Material:</b> Brass with gold plating and soft enamel <b>Design Concepts:</b> Front: A.G. Logo with golden rims (in +out) Back: Outline of RI map + U.S. Flag + RI Flag  	<b>500</b>	\$3.00	<b>\$1,500.00</b>
	<b>OR</b>		
	<b>1,000</b>	\$2.70	<b>\$2,700.00</b>
<b>Wording:</b> Front: Upper Half: PETER F. KILMARTIN Lower Half: ATTORNEY GENERAL  Back: Upper Half: THE STATE OF RHODE ISLAND Lower Half: AND PROVIDENCE PLANTATIONS  <b>Packaging:</b> each in a round acrylic coin case <b>Payment:</b> 50% at order confirmation, balance on delivery <b>Lead time:</b> 3 weeks after sample approval			(Set up and shipping are included)

Thank you for your business

Quoted by: *Victoria Huang*

(E)



## Project Proposal:

Prepared for: **Rhode Island -Office Of The Attorney General**

Prepared by: Gail Ahlers, Artistic Director / CEO

December 17, 2012

Proposal number: RIAG3-ChallengeCoin



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## Company Overview

### Description:

At Ahlers Designs, "the art of recognition" is at the heart of each and every project. We custom design awards and corporate gifts that accentuate each organization's unique culture, message, and mission. We help you show appreciation with class and originality.

### The Art of Recognition can help you:

- reach company or department goals or objectives.
- increase productivity and economic growth.
- recognize outstanding achievements and boost morale.
- strengthen workforce loyalty, dedication, and retention.
- thank board members, shareholders, staff, and volunteers for their efforts.
- motivate members and employees attain greater achievements.
- establish your organization as a valuable and dynamic entity enterprise.

### Design Services and Product Development:

- Design to Manufacturing - Made in the USA.
- Custom Awards and Unique Corporate Gifts.
- Green materials: recycling, reclaiming, repurposing.
- Casting, Fabrication, Fine and Ferrous metals.
- Graphic Design that illustrates your branding.
- Sculpture for Indoor and Outdoor environment.

### The Artist:

Born in the New York area, Gail Ahlers moved to Providence to attend Rhode Island School of Design, where she graduated with a BFA in Light Metals in 1985. After graduating from RISD, she studied art history in Paris and sculpture at the San Miguel de Allende Institute in Mexico.

With her expertise in precious metals and sculpture, Gail bridged her design talent and artistry in 1989 by founding Ahlers Designs, a company dedicated to her passion of bringing joy into people's lives. Gail works closely with clients to ensure that the unique gifts and custom awards she creates are valuable additions to the industries, events, or special occasions at which they will be presented.

### National Certifications:

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WBE - Women Owned (#MBCN 1110)

DBE - Disadvantaged (#MBCN 1110)

### NAICS Codes:

332999 (Primary), 332323, 541340, 541430, 541410, 541490, 711510, 423940

### PSC Codes:

9915, 9999, T001

### CAGE:

6R8T1

### Made in USA / Recycled / Reclaimed / Sustainable

## Project Summary:

### **Proposal III: Challenge Coins**

Following will be a follow up to Proposal II / Custom Challenge Coins.

Ahlers Designs would like to take this opportunity to re-submit the pricing schedule for Challenge Coins - Pewter Cast, Made in Rhode Island; in comparison with Brass Import and Domestic pricing.

### **Proposal II: Challenge Coins**

Following will be a follow up to Proposal I instilling two Design Concepts applied to the production of Challenge Coins - Pewter Cast, Made in Rhode Island.

### **Proposal I:**

Design and produce a Custom Challenge Coins and Lapel Pins for the Rhode Island Office of Attorney General.

### **Design & Development:**

It had been understand that you would require 500 to 1000 Challenge Coins. The designs proposed:

- The Anchor of Hope image floating on top of a silhouette outline of RI State. Or
- Scales of Justice on back (not shown, but will send illustrations if interested).

### **Challenge Coin:**

- 1.75" Diameter.
- Die Struck Brass.
- Polished w/Bright Gold Plating.

IMPORT & DOMESTIC Pricing Schedules were assigned.

Ahlers Designs is nationally certified through both WBENC and NGLCC.

We are known as being very involved and supportive of our local community.

We take every opportunity to design with "Green Innovation" recycled, reclaimed, and sustainable materials.

We pride ourselves with the Made in the USA label.

## Project Proposal: Challenge Coins

Primary contact:	Secondary contact:
Amy Kempe	Christopher Cotta
(401) 274-4400 x2234	(401) 274-4400
<a href="mailto:akempe@riag.ri.gov">akempe@riag.ri.gov</a>	<a href="mailto:ccotta@riag.ri.gov">ccotta@riag.ri.gov</a>

### Project objective:

Design and produce a Custom Challenge Coin for the Rhode Island Office of Attorney General.

### Design concept:



### Custom Challenge Coin:

This double-sided custom coin will present the name - Peter F. Kilmartin & Attorney General - around the outer circumference of coin. Center of coin would showcase the Rhode Island "Anchor of Hope".

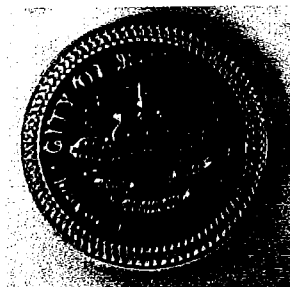
On the flip side - State of Rhode Island and Providence Plantations - will be printed around outer circumference.

Two Design options for the center display on back:

1. The Anchor of Hope image floating on top of a silhouette outline of RI State. Or
2. Scales of Justice on back (not shown, but will send illustrations if interested).

Challenge Coins will be of pewter cast, Polished Gold & Highlighted with enameled coloring.

(Shown @ Left - BRT Gold W/Enamel)



- Size: 1.75" diameter
- Finish: Polished with Bright Gold Plating w/ Enamel, OR Pewter Ox w/ Enamel.
- Qty: 250 to 500
- Packaged in soft vinyl double pocket flips W/card insert.

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**Pricing schedule estimates: Challenge Coins (Rhode Island)**

**PEWTER CAST / Made in Rhode Island.**

Custom Challenge Coin: (Bright Gold Finish)	Quantity	Unit Price	Cost
Custom Challenge Coin W/BRT Gold Plating & One Color Enamel, 2-sided-(Includes: packaging & card insert)	500	\$15.10	\$7,550.00
Custom Challenge Coin W/BRT Gold Plating & One Color Enamel, 2-sided (Includes: packaging & card insert)	250	\$16.75	\$4,187.50
Free Delivery			\$0.00

Custom Challenge Coin: (Pewter Ox Finish)	Quantity	Unit Price	Cost
Custom Challenge Coin, Solid Pewter Cast W/ One Color Enamel, 2-sided (Includes: packaging & card insert)	500	\$9.00	\$4,500.00
Custom Challenge Coin, Solid Pewter Cast W/ One Color Enamel, 2-sided (Includes: packaging & card insert)	250	\$10.65	\$2,662.50
Free Delivery			\$0.00

**Pricing schedule estimates: Challenge Coins (IMPORT & DOMESTIC)**

**Solid Brass, Gold Finish, & Enamel Color / Import & Domestic**

Custom Challenge Coin: (Brass / IMPORT)	Quantity	Unit Price	Cost
Custom Challenge Coin Brass W/packaging & card insert	500	\$10.60	\$5,300.00
Free Delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$5,300.00</b>

Custom Challenge Coin: (Brass / DOMESTIC)	Quantity	Unit Price	Cost
Custom Challenge Coin W/packaging & card insert	500	\$13.35	\$6,675.00
Free Delivery		0.00%	\$0.00
<b>Subtotal (before tax)</b>			<b>\$6,675.00</b>

**Delivery date:**

To Be Determined. Ahlers Designs requires 5 to 6 weeks lead time.

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## Terms of Doing Business

### Procedures:

- All products are sent FOB Pawtucket, RI
- Unless otherwise specified we ship the best way: US Mail, UPS, or carrier.
- Minimum shipping fee, \$15.00.

### Methods:

- Cash, Check, MC, Visa and American Express.

### Program: Custom Projects, Awards, & Corporate Gifts.

- Set-up Fees determined by individual project.
- Payment Schedule:
  - 1/3 deposit (non-refundable) prior to start of project;
  - 2/3 upon final shipment.
  - Custom projects \$1000.00 or less, Invoice must be paid in full.

### Production: Custom Projects, Awards, & Corporate Gifts.

- Initiation of project will not commence until receipt of signed approval form and deposit from client.
- Client will receive a selection of no more than 3 designs / drafts, or client may provide a specific design idea / option to be evaluated by designer as to casting capability.
- Additional designs of extensive graphic alterations will be subject to further design fees.
- Samples (if requested) are generally 2 – 4 weeks after final approval of design/art work, and receipt of deposit.
- Production is generally completed within 4 weeks once samples/art work is approved.

### Contact Information:

Gail Ahlers /Artistic Director, CEO

PH: 401.365.1010

FX: 401.365.1333

email: [gail@ahlersdesigns.com](mailto:gail@ahlersdesigns.com)

email: [operations@ahlersdesigns.com](mailto:operations@ahlersdesigns.com)

### Optional - Public relations:

If requested Ahlers Designs offers the service of press releases for our clients. This is available through PR web. prices ranging from \$150 - \$500. We write the press release and submit with photos of the award and information about your company. We can also submit information through social media channels like Facebook, Twitter, Youtube, etc.





PH: 401.365.1010 / EM: [gail@ahlersdesigns.com](mailto:gail@ahlersdesigns.com)

## Credit Application

**Fax To: 401.365.1333**

Legal Name of Company:	Federal ID:	D&B NO:
Trade Name d.b.a.:	Tax Exempt #	Years In Business:
Billing Address:	Annual Sales:	Est. Monthly Purchases
City, State, Zip:	A/P Contact Fax No:	Nature of Business:
A/P Contact Phone No:	A/P Contact Email Address:	Person to Contact for Payment:

Principles:	
Name and Title:	Social Security No:
Name and Title:	Social Security No:

Bank Information:	
Bank Name:	Account No:
Address:	Contact:

Credit References:	
Company:	Address
Credit Limit:	Account#:
Phone Number:	Contact:
Fax:	Email Address:
Company:	Address:
Credit Limit:	Account#:
Phone Number:	Contact:
Fax:	Email Address:
Company:	Address:
Credit Limit:	Account #:
Phone Number:	Contact:
Fax:	Email Address:

# INVOICE

RIAG20130328PNC

Sales Rep Contact: Victoria H. Huang  
atcvh@hotmail.com

Order Date:  
5/8/2013

Invoice Date:  
5/8/2013

**FROM**  
All Things Considered Promotions & Supplies Inc  
521 Roosevelt Avenue  
Central Falls, RI 02863  
United States  
Phone: (401)9651140  
Email: atcvh@hotmail.com  
Attn: Victoria H. Huang

**BILL TO**  
Office of the Attorney General  
150 South Main Street  
Providence, RI 02903  
United States  
Attn: Amy Kempe

**SHIP TO**  
Office of the Attorney General  
150 South Main Street  
Providence, RI 02903  
United States  
Attn: Amy Kempe

Method: Check

PO / Reference #: 3318483

Qty	Product #	Description	Unit	Price	Total
500	DS1518	CHALLENGE COIN; 1 3/4" ROUND, 3MM THICK; EACH IN AN ACRYLIC CASE, 100PCS TO A CASE	Each	\$3.000	\$1,500.00
5000	DS1518	LAPEL PIN 3/4" ROUND 2MM THICK; EACH/BAG, 100PCS/BAG, 500PCS/CASE	Each	\$0.620	\$3,100.00
		Color: Orange			
Sub-Total					\$4,600.00
Tax (0.000 %)					\$0.00
Total					\$4,600.00

*OK to Pkg  
5/8/13*