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Description of document: Records concerning the processing of public records requests to the Veterans Benefits Administration (VBA) regarding a secret deal between the Department of Veterans Affairs (VA) and Prudential Financial Inc. to modify insurance contracts so that fallen servicemembers' families could not obtain lump sum benefits, 2010-2012

Requested date: 2011

Released date: 20-June-2012

Posted date: 22-October-2012

Source of document: FOIA Request
Veterans Benefits Administration
810 Vermont Avenue, NW
(20M33) VACO
Washington, DC 20420
Fax: (202) 275-5947
Email: foia.vbaco@va.gov

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DEPARTMENT OF VETERANS AFFAIRS
Office of the General Counsel
Washington DC 20420

JUN 20 2012

In Reply Refer To: 024F
Case No. 21563

This letter is the final agency administrative decision by the Department of Veterans Affairs (VA) in response to your appeal under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. You appealed the denial, by the Veterans Benefits Administration (VBA), of your FOIA request for records pertaining to "[requests] processed previously for other [requestors] for records associated with the Department of Veterans Affairs and Prudential Financial..." After thoroughly reviewing this matter, your appeal is granted in part for the reasons stated below.

After a thorough search, we located the records responsive to request. The records are included herein. Please note, however, that the names, home addresses, and other personal information for certain individuals have been redacted pursuant to FOIA Exemption 6 (5 U.S.C. § 552(b)(6)) as disclosure of such information would be a clearly unwarranted invasion of personal privacy.

Exemption 6 protects records the release of which would lead to a clearly unwarranted invasion of personal privacy. 5 U.S.C. § 552(b)(6). The individuals identified in these documents have an expectation of privacy in these records. Although the disclosure of this information would be permissible if it would serve an articulable public interest under the FOIA, no such interest has been found in this information. The balance, therefore, weighs in favor of protecting the individuals' privacy, and we find that the information was properly withheld.

The FOIA requires us to advise you that if you believe that VA erred in this decision, you have the right to file a complaint in an appropriate United States District Court. We regret that we could not be more helpful.

As part of the 2007 FOIA amendments, the Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

2.

Office of Government Information Services
National Archives and Records Administration
Room 2510
8601 Adelphi Road
College Park, MD 20740-6001

E-mail: ogis@nara.gov
Telephone: 301-837-1996
Facsimile: 301-837-0348
Toll-free: 1-877-684-6448

Sincerely yours,

A handwritten signature in black ink, appearing to read "Deborah K. McCallum", with a long horizontal flourish extending to the right.

Deborah K McCallum
Assistant General Counsel

Enclosures

May 27, 2010

FOIA REQUEST

Expedited processing requested

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request access to and copies of of contracts and correspondence relating to Prudential Life's Alliance Program and the Veteran's Group Life Insurance and/or Servicemember's Group Life Insurance.

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

Please provide expedited processing of this request which concerns a matter of

I look forward to your reply within 20 business days, as the statute requires.

Sincerely,

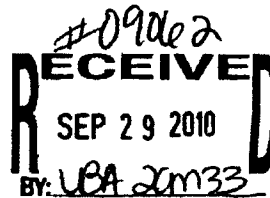
David Evans, Senior Writer



September 16, 2010

REGULAR MAIL

Bernard Johnson
VBA FOIA Central Office
U.S. Department of Veterans Affairs
810 Vermont Ave., NW
Washington, DC 20420



Dear Mr. Johnson:

This is a request under the Freedom of Information Act (FOIA) (5 U.S.C. § 552 *et seq.*).

Please provide me with all the documents pertaining to Servicemembers' Group Life Insurance ("SGLI") and Veterans' Group Life Insurance ("VGLI") that were recently provided to the Bloomberg News Service ("Bloomberg") in response to its FOIA request.

The documents I seek are described in the attached Bloomberg article, dated September 14, 2010. Among other things, it appears that the VA provided Bloomberg with:

- (1) The amendment to the SGLI/VGLI life insurance contract between the VA and the Prudential Life Insurance Co. ("Prudential"), dated September 1, 2009;
- (2) The original SGLI/VGLI life insurance contract between the VA and Prudential dated 1965;
- (3) The amended SGLI/VGLI life insurance contract between the VA and Prudential, dated 2007;
- (4) The amended SGLI/VGLI life insurance contract between the VA and Prudential, dated September 2009;
- (5) An email from Thomas Lastowka, the VA's director for insurance, to Stephen Wurtz, the agency's deputy assistant director for insurance, concerning SGLI/VGLI, dated June 9, 1999;
- (6) A presentation from Prudential to the VA concerning SGLI/VGLI, dated June 10, 1998.

ATTORNEYS AT LAW

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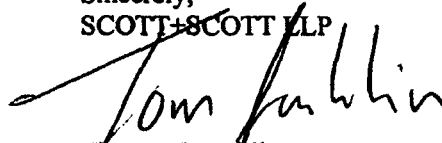
Department of Veterans Affairs
September 16, 2010
Page 2

The foregoing is an illustrative list of the documents that I seek, garnered from the attached Bloomberg article. I seek to be provided with the entirety of the documents provided to Bloomberg.

In addition, please provide all documents that comprise the full investigation (including without limitation interview notes, all documents inspected and created, draft press releases, and all e-mails that were reviewed) of the VA life insurance program purportedly begun on July 28, 2010 that resulted in the change of policy regarding payment of life insurance benefits announced by the VA on September 15, 2010.

I will pay up to \$1,000 for search and review fees without prior authorization. If the duplication fees exceed \$1,000, please call me. My daytime telephone number is (212) 223-6444 and my email address is tlaughlin@scott-scott.com.

Sincerely,
SCOTT+SCOTT LLP

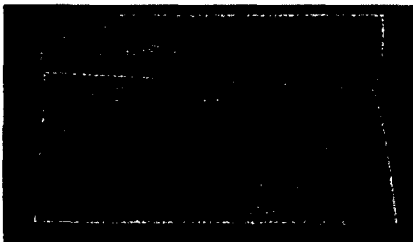


Thomas Laughlin

Bloomberg.com**Veterans Agency Made Secret Deal With Prudential (Update3)**

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By David Evans



Sept. 14 (Bloomberg) -- The U.S. Department of Veterans Affairs failed to inform 6 million soldiers and their families of an agreement enabling **Prudential Financial Inc.** to withhold lump-sum payments of life insurance benefits for survivors of fallen service members, according to records made public through a Freedom of Information request.

The amendment to Prudential's contract is the first document to show how VA officials sanctioned a payment practice that has spurred investigations by lawmakers and regulators. Since 1999, Prudential has used so-called retained-asset accounts, which allow the company to withhold lump-sum payments due to survivors and earn investment income on the money for itself.

The Sept. 1, 2009, amendment to Prudential's contract with the VA ratified another unpublicized deal that had been struck between the insurer and the government 10 years earlier -- one that was never put into writing, Bloomberg Markets magazine reports in its November issue. This verbal agreement in 1999 provoked concern among top insurance officials of the agency, the documents released in the FOIA request show.

For a decade, until the contract was formally changed, Prudential wasn't fulfilling its obligations to survivors of fallen service members, says Brendan Bridgeland, an insurance lawyer who runs the non-profit Center for Insurance Research in Cambridge, Massachusetts.

'Violated Terms'

"It's very clear they violated the original terms of the contract," says Bridgeland, who is retained by the **National Association of Insurance Commissioners** to represent consumers.

"Every veteran I've spoken with is appalled at the brazen war profiteering by Prudential," says Paul Sullivan, who served in the 1991 Gulf War as an Army cavalry scout and is now executive director of **Veterans for Common Sense**, a nonprofit advocacy group based in Washington. "Now vets are upset at the VA's inability to stop Prudential's bad behavior."

That the VA allowed Prudential to issue retained-asset accounts for 10 years while the contract required lump-sum payouts is "more evidence that the VA was asleep at the wheel for a decade," says Sullivan, who was a project manager and analyst at the VA from 2000 to 2006.

"When grieving families check the box that they want a lump sum, they should get it. We remain disappointed and irate at the VA's failure to provide advocacy for veterans," he says.

State and U.S. Probes

Since July 28, when Bloomberg Markets first reported that Prudential sent checkbooks instead of checks to survivors requesting lump-sum payouts, state and federal officials have demanded the retained-asset

system be investigated and reformed. The VA itself launched a probe of its life insurance program the day the first story was published.

The next day, New York Attorney General **Andrew Cuomo** launched what he called a "major fraud investigation" of Prudential and other life insurers over their use of retained-asset accounts. Since then, Cuomo's office has issued subpoenas to Prudential and at least 12 more insurance companies.

The insurance departments in **Georgia** and New York have also opened probes. The U.S. House Oversight and Reform Committee plans to hold hearings into Prudential's use of retained-asset accounts to pay money owed to fallen soldiers' survivors.

'News to Me'

U.S. Secretary of Defense **Robert Gates** -- who was in office when the 2009 agreement was signed -- said when the VA started its probe that he had been unaware that survivors were being sent retained-asset accounts.

"Until today I actually believed that the families of our fallen heroes got a check for the full amount of their benefits," Gates said at the time. "This came as news to me."

As a result of the VA probe, the agency announced today that it will change its insurance program, allowing survivors to request and receive lump-sum checks.

Under Prudential's original 1965 contract with the VA and a 2007 revised contract -- both of which were released as part of the FOIA response -- the insurer is required to send lump-sum payouts to survivors requesting them. The contract covers 6 million active service members, their families and veterans.

The checkbooks Prudential sends to survivors are tied to what the insurer calls its Alliance Account. The checkbooks are made up of drafts, or IOUs, and aren't insured by the **Federal Deposit Insurance Corp.** Prudential invests the survivors' money in its general corporate account, where it can earn the insurer as much as eight times as much as it currently pays in interest to beneficiaries.

Bond Income

Prudential held \$662 million of survivors' money in its corporate general account as of June 30, according to information provided by the VA. Prudential's general account earned 4.2 percent in 2009, mostly from bond investments, according to regulatory filings. The company has paid survivors holding Alliance Accounts 0.5 percent in 2010.

Families that were supposed to receive lump-sum payments under the terms of the contract before it was amended in 2009 may be able to successfully sue Prudential for lost interest, insurance lawyer Bridgeland says.

"Survivors would have a very strong claim for interest earned by Prudential on their money," he says.

Prudential spokesman **Bob DeFillippo** says his company is following the terms of its agreement with the VA.

"Prudential is in compliance with its contract with the Department of Veterans' Affairs," he says.

DeFillippo declined to comment on whether Prudential was in compliance with its contract between 1999 and September 2009 or to answer any other questions. Prudential chairman and Chief Executive Officer **John Strangfeld** declined to comment for this story.

Useful Service

In July, DeFillippo said Prudential's retained-asset account was a useful service for bereaved relatives of soldiers. "For some families, the account is the difference between earning interest on a large amount of money and letting it sit idle," he said. Survivors can withdraw some or all of their money at any time, he said.

Veterans Affairs Chief of Staff **John Gingrich** says the agency approved use of the Alliance Account because it wanted to help survivors.

"We needed to give an option to individuals that allowed them more flexibility and time to react to the tragic family situation," Gingrich says.

Verbal Agreement

VA spokeswoman Katie Roberts declined to say when Veterans Affairs Secretary **Eric Shinseki**, who was appointed by President **Barack Obama** in January 2009, learned of the existence of the 1999 verbal agreement and the 2009 amendment. She also declined to make Shinseki available for comment.

The VA official who verbally agreed in 1999 to allow Prudential to change the terms of the 1965 contract and begin offering retained-asset accounts was Thomas Lastowka, the VA's director for insurance, according to Dennis Foley, a VA attorney. Prudential began sending Alliance Account kits to soldiers' beneficiaries in June 1999.

Foley says the VA and Prudential would have been better off if they had put their 1999 agreement in writing.

"Could that have been done better?" Foley asks. "Probably. Best practice would have been to legally memorialize it at the time."

Foley says the 1999 changes to the 1965 contract were valid, even if they weren't in writing, because they were made by mutual agreement by people empowered to make such decisions.

"It was changed by somebody who was authorized to change it," he says.

Contract Terms

The language of both the 1965 contract and the 2009 amendment make clear that Newark, New Jersey-based **Prudential** was required to adhere to the original terms until 2009, regardless of any handshake agreements in 1999, insurance lawyer Bridgeland says.

The 1965 contract says any alterations must be made in writing.

"No change in the Group Policy shall be valid unless evidenced by an amendment thereto," it says. "No Agent is authorized to alter or amend the Group Policy."

The VA and Prudential signed a revised contract in 2007, saying it was "amended in its entirety." That contract, with the exact same words as the 1965 agreement, required that Prudential pay survivors with lump sums.

The 2007 revision included the same procedures in the 1965 agreement requiring any changes be made in writing. It contained no mention of the retained-asset system, or of the verbal agreement struck in 1999.

2009 Amendment

It wasn't until Sept. 24, 2009, that the changes agreed to by VA official Lastowka and Prudential in 1999 were put into writing. The 2009 amendment allowing Prudential to hold onto death benefit payouts was made retroactive to Sept. 1, 2009, not back to 1999.

By putting in writing a change that was verbally adopted 10 years earlier, the VA is effectively trying to backdate the amendment, says Jeffrey Stempel, an insurance law professor at the **William S. Boyd School of Law** at the University of Nevada, Las Vegas, who wrote "Stempel on Insurance Contracts" (Aspen Publishers, 2009).

"They're trying to reinvent history," Stempel says. "You really can't do that. This is a blatant giveaway by the VA with nothing for the agency or the people in uniform."

Nine of every 10 survivors ask **Prudential** for lump-sum payments, the VA says. Prudential sends those families "checkbooks" instead of checks.

'Disasters Do Happen'

Documents released in the FOIA request show some signs of concern within the VA after Prudential

proposed the retained-asset accounts in 1998. Lastowka, the official who allowed Prudential to introduce the Alliance Accounts, said that the insurer's "checkbook" system wasn't protected by the FDIC.

"Disasters do happen," wrote Lastowka, in an e-mail dated June 9, 1999, to Stephen Wurtz, the agency's deputy assistant director for insurance.

Lastowka said in his e-mail that the lack of FDIC coverage could backfire on survivors.

"Who is responsible if Alliance goes belly up?" Lastowka asked. "I think we have to also be prepared to defend the use of the Alliance Account."

Lastowka also asked whether Prudential had adequately disclosed to survivors that the Alliance Accounts weren't covered by FDIC insurance. "Did Pru alert us to the non-FDIC fact?" he wrote to Wurtz. "Or was it in small print as the notice to beneficiaries?"

Documents turned over by the VA didn't include a response from Wurtz.

'Aware of Issues'

Lastowka says his e-mail shows the decision to allow Alliance Accounts was carefully considered.

"This e-mail demonstrates simply that the VA's Insurance program was aware of issues that might be raised as we implemented the payment method and that we should be prepared to respond to inquiries," Lastowka says. "We were confident that we were making a decision which would benefit survivors."

The FOIA documents show that on June 10, 1998, Prudential gave a presentation to the VA. It included 10 pages of key points, saying the Alliance Accounts would benefit survivors because they would provide safety, flexibility in how and when to use their money, competitive interest rates and customer service.

In fine print, at the bottom of one of the pages, was this caveat: "Funds in the Alliance Account are direct obligations of The Prudential Insurance Company of America and are not insured by the Federal Deposit Insurance Corporation."

Sheila Bair

Twelve years later, the issue of the lack of FDIC protection in retained-asset accounts flared anew.

FDIC Chairman **Sheila Bair** said in August that consumers could incorrectly conclude that retained-asset accounts were insured by the FDIC.

"The insurance company must take care to avoid implying in any way that these accounts are in fact FDIC-insured," she wrote in an Aug. 5 letter to state insurance regulators.

Some families of veterans have taken their complaints to court. Five survivors filed a federal fraud lawsuit in Boston on Aug. 30 against Prudential claiming the insurer has earned as much as \$500 million in profits by improperly keeping beneficiaries' money instead of paying it out in a lump sum.

The suit, *Lucey vs. Prudential Insurance Co. of America*, says the insurer fraudulently claims to beneficiaries that the Alliance Account is a lump sum.

'This Ruse'

"Initiation of this ruse does not constitute payment of anything to anyone," the suit says. "The Alliance Account is merely a bookkeeping device used by Prudential to hold on to beneficiaries' money."

Prudential hasn't yet filed a response in court. Spokesman DeFillippo says he can't comment on the case.

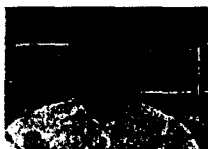
"It is important to note that several federal judges have rejected claims against accounts like our Alliance Account, concluding that beneficiaries are in virtually the same position they would be in had the insurer sent them a check," DeFillippo says. He cited the dismissal of a case against **MetLife Inc.** on Sept. 10.

Insurance contract professor Stempel says that regardless of the outcome of that lawsuit, it's clear that Prudential and the VA wrongly manipulated a federal contract at the expense of military members and their relatives. "At a minimum, survivors ought to be made whole with their missed interest," he says. "The VA really seems to have had the best interests of the insurance company at heart, instead of those of the soldiers and their families."

To contact the reporter on this story: **David Evans** in Los Angeles at davidevans@bloomberg.net.

Last Updated: September 14, 2010 12:12 EDT

Related Videos



● Watch

Evans Interview on Veterans Agency Deal With Prudential

Sept. 14 (Bloomberg) -- Bloomberg's David Evans talks about an agreement between the U.S. Department of Veterans Affairs and Prudential Financial Inc. that enabled the insurer to withhold lump-sum payments of life insurance benefits for survivors of fallen soldiers. The veterans agency said today that Prudential will now send beneficiaries a check when they ask for a lump-sum benefit payment rather than keeping the money and mailing a checkbook. Evans speaks with Margaret Brennan on Bloomberg Television's "InBusiness".



● Watch

Insurance Panel Aug. 15 Reviews Retained-Asset Accounts

Aug. 25 (Bloomberg) -- Todd Katz, executive vice president for insurance products at MetLife Inc., and Bernard Winograd, executive vice president and chief operating officer of Prudential's U.S.-based businesses, appear before a National Association of Insurance Commissioners panel reviewing retained-asset accounts. Paul Graham of the American Council of Life Insurers, Peter Gallanis of the National Organization of Life and Health Guaranty Associations, Brian Kennedy, state representative of Rhode Island, and a number of consumer advocates also spoke to the panel on Aug. 15.



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Department of Veterans Affairs
Philadelphia Regional Office VA Insurance Ctr.
5000 Wissahickon Avenue 310
Philadelphia PA 19101-8079
Attn: Jeanne King/Monica Keitt

February 18, 2011

Dear Ms. King and/or Ms. Keitt:

This is a request under the Freedom of Information Act. I request that you submit a copy of the following:

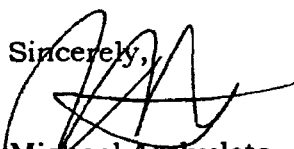
For the purposes of each of the following requests the term Prudential means Prudential, Prudential Insurance, Prudential Insurance Company, Prudential Life Insurance Company, Prudential Insurance Company of America, Prudential Holdings LLC, and/or Prudential Financial, Inc.

- 1) From 1965 until the date of this request, all contracts, contract amendments, and contract revisions between the VA and Prudential regarding SGLI, VGLI, FSGLI and/or TSGLI insurance.
- 2) For the years 2007, 2009, 2010, and 2011 all VA internal correspondence regarding contracts, contract amendments, and contract revisions between the VA and Prudential involving SGLI, VGLI, FSGLI and/or TSGLI insurance.
- 3) For the years 2007, 2009, 2010, and 2011 all correspondence between the VA and Prudential regarding contracts, contract amendments, and contract revisions between the VA and Prudential involving SGLI, VGLI, FSGLI and/or TSGLI insurance.
- 4) All recordings, slides, and memorializations of the June 10, 1998 meeting in which Prudential gave a presentation to the VA.
- 5) All documents reviewed, utilized and/or created during the June 10, 1998 meeting in which Prudential Insurance Company gave a presentation to the VA.
- 6) For the years 1998 and 1999, all VA internal correspondence regarding retained asset accounts and/or Prudential Alliance Accounts.
- 7) For the years 1998, 1999, 2009, 2010, and 2011 all VA correspondence with Prudential regarding retained asset accounts and/or Prudential Alliance Accounts.
- 8) All VA press releases and drafts thereof regarding Prudential Alliance Accounts from 1998 until the date of this request.
- 9) All Servicemember' and Veterans' Group Life Insurance Programs Annual Reports from 1990 until the date of this request.

I am willing to pay up to \$500.00 for the processing of my request. Please notify me if you estimate the fees to exceed this amount.

If you have any questions, I may be reached at 512-413-7500 or by e-mail at michael@elakeway.com. You may also provide any documents to my email address in PDF format if you wish and that makes processing of my request easier.

Sincerely,


Michael Archuleta
PO Box 340639
Austin, Texas 78734
512-413-7500

physical address: Michael Archuleta
1100 Lakeway Drive #101
Austin, Texas 78734
512-413-7500

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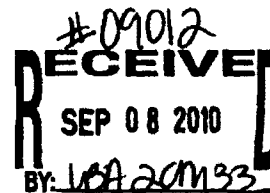
September 2, 2010

MICHAEL VON LOEWENFELDT
E-MAIL: MVLO@KERRWAGSTAFFE.COM

VIA CERTIFIED MAIL & FACSIMILE ((202) 275-5947)

Frances Hudzik
Veterans Benefits Administration
Department of Veterans Affairs
810 Vermont Ave., NW
(20M33) VACO
Washington, DC 20420

Re: *Freedom of Information Act Request*



Dear Mr. Hudzik:

I write to request, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, access to and copies of the following documents and/or records containing the requested information:

1. For each year from 1995 to the present:
 - a. A count of the beneficiaries to whom death benefits were granted in the Servicemembers' Group Life Insurance ("SGLI") program.
 - b. A count of the beneficiaries to whom Traumatic Injury Protection benefits were granted in the SGLI program.
 - c. A count of the beneficiaries to whom death benefits were granted in the Family SGLI program.
 - d. A count of the beneficiaries to whom death benefits were granted in the VGLI program.
2. For each year from 1995 to the present:
 - a. A count of the beneficiaries to whom death benefits were granted in the SGLI program who requested payment in a lump sum.

Frances Hudzik
September 2, 2010
Page 2

- b. A count of the beneficiaries to whom Traumatic Injury Protection benefits were granted in the SGLI program who requested payment in a lump sum.
 - c. A count of the beneficiaries to whom death benefits were granted in the Family SGLI program who requested payment in a lump sum.
 - d. A count of the beneficiaries to whom death benefits were granted in the VGLI program who requested payment in a lump sum.
 3. For each year from 1995 to the present:
 - a. The total monetary amount of claims for death benefits granted in the SGLI program.
 - b. The total monetary amount of claims for Traumatic Injury Protection benefits granted in the SGLI program.
 - c. The total monetary amount of claims for death benefits granted in the Family SGLI program.
 - d. The total monetary amount of claims for death benefits granted in the VGLI program.
 4. For each year from 1995 to the present:
 - a. The amount of fees the Department of Veterans Affairs and/or Veterans Benefits Administration has paid to Prudential in connection with the SGLI program.
 - b. The amount of fees the Department of Veterans Affairs and/or Veterans Benefits Administration has paid to Prudential in connection with the Family SGLI program.
 - c. The amount of fees the Department of Veterans Affairs and/or Veterans Benefits Administration has paid to Prudential in connection with the VGLI program.
 5. Copies of all complaints (including documents reflecting oral complaints) made to the Department of Veterans Affairs and/or Veterans Benefits Administration from 1999 to the present concerning Prudential's Alliance Accounts.
 6. Copies of all complaints (including documents reflecting oral complaints) made to the Department of Veterans Affairs and/or Veterans Benefits Administration from 1999 to the present concerning Prudential's payment of benefits in a lump sum.

Frances Hudzik
September 2, 2010
Page 3

7. Copies of all complaints (including documents reflecting oral complaints) made to Prudential from 1999 to the present concerning Prudential's Alliance Accounts.
 8. Copies of all complaints (including documents reflecting oral complaints) made to Prudential from 1999 to the present concerning Prudential's payment of benefits in a lump sum.
 9. All documents that evidence the approval referred to by Director Thomas M. Lastowka in his August 6, 2010 letter to beneficiaries wherein he stated "In an effort to better serve beneficiaries, VA in 1999 authorized the use of Prudential's Alliance Accounts as the main method of payment to beneficiaries of SGLI and VGLI programs."
 10. All documents that were in the possession of the Department of Veterans Affairs and/or Veterans Benefits Administration in 1999 concerning Prudential's Alliance Accounts.
 11. All emails sent to or from Acting Under Secretary for Benefits Michael Walcoff (or his staff) since July 1, 2010 relating to or mentioning in any way the following subjects:
 - a. Prudential's Alliance Accounts
 - b. Prudential's method of payment of lump sum benefits under SGLI, TSGLI, FSGLI or VGLI programs
 - c. The use of retained asset accounts in connection with the SGLI, TSGLI, FSGLI or VGLI programs
 - d. The Bloomberg News article titled "Fallen Soldiers' Families Denied Cash as Insurers Profit" dated July 28, 2010.
 - e. The Washington Post article by Bloomberg News article titled "Insurers hold billions in federal death benefits in unprotected accounts" dated August 1, 2010
 - f. The New York Times news article titled "Families of Dead Soldiers Sue Insurer Over Its Handling of Survivors' Benefits" dated August 30, 2010.
 - g. The Associated Press news article titled "Dead soldiers' parents sue insurer over benefits" dated August 30, 2010.
 - h. The pending legislation HR. 5993
 - i. The pending legislation S. 3718
-

Frances Hudzik
September 2, 2010
Page 4

- j. The lawsuit Lucey et al v. Prudential Insurance Company of America, U.S. Dist. Ct for the Dist. of Massachusetts case number 3:10-CV-31063-MAP, including any reference to any of the plaintiffs or their lawyers.
 - k. Any inquiry by members of Congress or their staff into the SGLI or VGLI programs since July 28, 2010
 - l. Any inquiry by White House staff into the SGLI or VGLI programs since July 28, 2010
12. All emails sent to or from Acting Deputy Under Secretary for Benefits Rick Cardarelli (or his staff) since July 1, 2010 relating to or mentioning in any way the following subjects:
- a. Prudential's Alliance Accounts
 - b. Prudential's method of payment of lump sum benefits under SGLI, TSGLI, FSGLI or VGLI programs
 - c. The use of retained asset accounts in connection with the SGLI, TSGLI, FSGLI or VGLI programs
 - d. The Bloomberg News article titled "Fallen Soldiers' Families Denied Cash as Insurers Profit" dated July 28, 2010.
 - e. The Washington Post article by Bloomberg News article titled "Insurers hold billions in federal death benefits in unprotected accounts" dated August 1, 2010
 - f. The New York Times news article titled "Families of Dead Soldiers Sue Insurer Over Its Handling of Survivors' Benefits" dated August 30, 2010.
 - g. The Associated Press news article titled "Dead soldiers' parents sue insurer over benefits" dated August 30, 2010.
 - h. The pending legislation HR. 5993
 - i. The pending legislation S. 3718
 - j. The lawsuit Lucey et al v. Prudential Insurance Company of America, U.S. Dist. Ct for the Dist. of Massachusetts case number 3:10-CV-31063-MAP, including any reference to any of the plaintiffs or their lawyers.
-

Frances Hudzik
September 2, 2010
Page 5

- k. Any inquiry by members of Congress or their staff into the SGLI or VGLI programs since July 28, 2010
 - l. Any inquiry by White House staff into the SGLI or VGLI programs since July 28, 2010
13. All emails sent to or from Chief of Staff Lois Mittelstaedt (or her staff) since July 1, 2010 relating to or mentioning in any way the following subjects:
- a. Prudential's Alliance Accounts
 - b. Prudential's method of payment of lump sum benefits under SGLI, TSGLI, FSGLI or VGLI programs
 - c. The use of retained asset accounts in connection with the SGLI, TSGLI, FSGLI or VGLI programs
 - d. The Bloomberg News article titled "Fallen Soldiers' Families Denied Cash as Insurers Profit" dated July 28, 2010.
 - e. The Washington Post article by Bloomberg News article titled "Insurers hold billions in federal death benefits in unprotected accounts" dated August 1, 2010
 - f. The New York Times news article titled "Families of Dead Soldiers Sue Insurer Over Its Handling of Survivors' Benefits" dated August 30, 2010.
 - g. The Associated Press news article titled "Dead soldiers' parents sue insurer over benefits" dated August 30, 2010.
 - h. The pending legislation HR. 5993
 - i. The pending legislation S. 3718
 - j. The lawsuit Lucey et al v. Prudential Insurance Company of America, U.S. Dist. Ct for the Dist. of Massachusetts case number 3:10-CV-31063-MAP, including any reference to any of the plaintiffs or their lawyers.
 - k. Any inquiry by members of Congress or their staff into the SGLI or VGLI programs since July 28, 2010
 - l. Any inquiry by White House staff into the SGLI or VGLI programs since July 28, 2010
-

Frances Hudzik
September 2, 2010
Page 6

14. All emails sent to or from Deputy Assistant Director For Insurance Stephen Wurtz (or his staff) since July 1, 2010 relating to or mentioning in any way the following subjects:
- a. Prudential's Alliance Accounts
 - b. Prudential's method of payment of lump sum benefits under SGLI, TSGLI, FSGLI or VGLI programs
 - c. The use of retained asset accounts in connection with the SGLI, TSGLI, FSGLI or VGLI programs
 - d. The Bloomberg News article titled "Fallen Soldiers' Families Denied Cash as Insurers Profit" dated July 28, 2010.
 - e. The Washington Post article by Bloomberg News article titled "Insurers hold billions in federal death benefits in unprotected accounts" dated August 1, 2010
 - f. The New York Times news article titled "Families of Dead Soldiers Sue Insurer Over Its Handling of Survivors' Benefits" dated August 30, 2010.
 - g. The Associated Press news article titled "Dead soldiers' parents sue insurer over benefits" dated August 30, 2010.
 - h. The pending legislation HR. 5993
 - i. The pending legislation S. 3718
 - j. The lawsuit Lucey et al v. Prudential Insurance Company of America, U.S. Dist. Ct for the Dist. of Massachusetts case number 3:10-CV-31063-MAP, including any reference to any of the plaintiffs or their lawyers.
 - k. Any inquiry by members of Congress or their staff into the SGLI or VGLI programs since July 28, 2010
 - l. Any inquiry by White House staff into the SGLI or VGLI programs since July 28, 2010
15. All emails sent to or from Director Thomas M. Lastowka (or his staff) since July 1, 2010 relating to or mentioning in any way the following subjects:
- a. Prudential's Alliance Accounts
-

Frances Hudzik
September 2, 2010
Page 7

- b. Prudential's method of payment of lump sum benefits under SGLI, TSGLI, FSGLI or VGLI programs
 - c. The use of retained asset accounts in connection with the SGLI, TSGLI, FSGLI or VGLI programs
 - d. The Bloomberg News article titled "Fallen Soldiers' Families Denied Cash as Insurers Profit" dated July 28, 2010.
 - e. The Washington Post article by Bloomberg News article titled "Insurers hold billions in federal death benefits in unprotected accounts" dated August 1, 2010
 - f. The New York Times news article titled "Families of Dead Soldiers Sue Insurer Over Its Handling of Survivors' Benefits" dated August 30, 2010.
 - g. The Associated Press news article titled "Dead soldiers' parents sue insurer over benefits" dated August 30, 2010.
 - h. The pending legislation HR. 5993
 - i. The pending legislation S. 3718
 - j. The lawsuit Lucey et al v. Prudential Insurance Company of America, U.S. Dist. Ct for the Dist. of Massachusetts case number 3:10-CV-31063-MAP, including any reference to any of the plaintiffs or their lawyers.
 - k. Any inquiry by members of Congress or their staff into the SGLI or VGLI programs since July 28, 2010
 - l. Any inquiry by White House staff into the SGLI or VGLI programs since July 28, 2010
16. All emails sent after July 1, 2010 to or from any Department of Veterans Affairs and/or Veterans Benefits Administration email account from or to any email address within the @prudential.com domain or that includes the characters "prudential.com"
17. Exemplars of all briefing materials used in 2010 to brief separating service members about transitioning from SGLI to VGLI
18. Exemplars of all written materials provided to separating service members in 2010 about transitioning from SGLI to VGLI
-

Frances Hudzik
September 2, 2010
Page 8

19. All written materials prepared by the Department of Veterans Affairs and/or Veterans Benefits Administration, including but not limited to letters, pamphlets, and brochures, provided to SGLI or VGLI beneficiaries concerning their rights to rollover benefits paid into Roth IRAs, ESAs, or other tax-beneficial accounts pursuant to the Heroes Earnings Assistance and Relief Tax Act ("HEART Act").
20. All written materials prepared by Prudential Insurance Company or its OSGLI division, including but not limited to letters, pamphlets, and brochures, provided to SGLI or VGLI beneficiaries concerning their rights to rollover benefits paid into Roth IRAs, ESAs, or other tax-beneficial accounts pursuant to the Heroes Earnings Assistance and Relief Tax Act ("HEART Act").

Please note that I have sent an identical request to Janet Hardt, FOIA officer for the Philadelphia Regional Office and Insurance Center for the Department of Veterans Affairs. I am not asking that you duplicate efforts. Instead, this letter has been sent to seek only those documents that are not provided by Ms. Hardt.

I agree to pay reasonable duplication fees for the processing of this request, up to a maximum of \$1,000. If you anticipate that the fees will exceed this limit, please phone me prior to incurring them. Please note that, to the extent it facilitates your response to this request and/or reduces the applicable duplication costs, I will accept (and would prefer) the information and/or documents in native file format including .pst files for emails, Microsoft Excel format (.xls or .xlsx), Portable Document Format ("PDF") or Tagged Image File Format ("TIFF").

To the extent that this request is denied in whole or in part, please note that I request that such denials be justified by reference to specific exemptions of the Act. I further request that you release all segregable portions of otherwise exempt material.

Should you have any questions or concerns regarding this request, please do not hesitate to call me at (415) 371-8500. Thank you for your assistance.

Very truly yours,



MICHAEL VON LOEWENFELDT

MVL| 58287_2

K E R R
W A G S T A F F E
LLP
ATTORNEYS

100 SPEAR STREET, SUITE 1800
SAN FRANCISCO, CALIFORNIA 94105

TELEPHONE (415) 371-8500
FACSIMILE (415) 371-0500

F A C S I M I L E

TO: Frances Hudzik

VETERANS BENEFITS ADMINISTRATION FACSIMILE: (202) 275-5947

DATE: September 2, 2010

FROM: Michael von Loewenfeldt

RE: *Lucey v. Prudential Insurance Company of America*

PAGES: Cover + 8

- ☐ URGENT
- ☐ FOR REVIEW
- ☐ PLEASE COMMENT
- ☒ PLEASE REPLY

C O M M E N T S

Please see attached.

C O N F I D E N T I A L I T Y N O T I C E

The documents accompanying this facsimile transmission and this Transmittal Sheet contain information that is confidential and privileged. The information is intended to be for the sole use of the individuals or entities named on this Transmittal Sheet. If you are not an intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this telecopied information is prohibited. If you have received this facsimile in error, please notify us by telephone immediately so that we can arrange for the retrieval of the telecopied documents at no cost to you.

IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED ABOVE, PLEASE CALL US AS SOON AS POSSIBLE AT 415.371.8500.

K E R R
— & —
W A G S T A F F E
LLP
ATTORNEYS

101 SIFAR STREET, SUITE 1800
SAN FRANCISCO, CALIFORNIA 94103

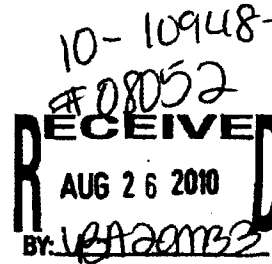
TELEPHONE 415 371 8900
FACSIMILE 415 371 0500
www.kerrwagstaffe.com

August 25, 2010

DANIEL A. ZANEER
E-MAIL: ZANEER@KERRWAGSTAFFE.COM

VIA U.S. MAIL & FACSIMILE ((202) 275-5947)

Frances Hudzik
Veterans Benefits Administration
Department of Veterans Affairs
810 Vermont Ave., NW
(20M33) VACO
Washington, DC 20420



Re: *Freedom of Information Act Request*

Dear Mr. Hudzik:

I write to request, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, access to and copies of the following documents:

1. All contracts with Prudential Insurance Company of America (including its subdivisions, the Office of Servicemember's Group Life Insurance ("OSGLI") and Prudential Alliance Account Services) and the United States government (including the Department of Veterans' Affairs) regarding the Servicemembers' Group Life Insurance ("SGLI"), Family Servicemembers' Group Life Insurance ("FSGLI"), Traumatic Injury Protection Insurance ("TSGLI") and Veterans' Group Life Insurance ("VGLI") programs, from 1995 to the present.
2. On pages 39, 42 and 43 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the report cites the "OSGLI Monthly Report." Please provide a copy of each such Monthly Report from 1995 to the present.
3. On page 39 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the report cites the "OSGLI Monthly Report Statement of Financing and Net Position." Please provide a copy of each such Statement from 1995 to the present.
4. On page 45 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the Report cites "SGLI/VGLI/TSGLI Monthly Reports." Please provide copies of each such Monthly Report from 1995 to the present.

August 25, 2010

Page 2

5. On page 56 of the Veterans Benefits Administration's Fiscal Year 2006 Annual Benefits Report, the report cites the "Prudential Monthly Report." Please provide a copy of each such Monthly Report from 1995 to the present.
6. All other reports prepared by Prudential Insurance Company of America (including its subdivisions, OSGLI and Prudential Alliance Account Services) regarding benefits paid under the SGLI, FSGLI, TSGLI and VGLI programs, or Alliance Accounts, from 1995 to the present.
7. All reports prepared by the Department of Veterans Affairs regarding Alliance Accounts, from 1995 to the present.
8. Copies of the Veterans Benefits Administration Annual Benefits Reports for fiscal years 1995, 1996, 1997 and 1998.
9. Copies of each of the Department of Veterans' Affairs Servicemembers' and Veterans' Group Life Insurance Programs Annual Reports for each year from 1995 to the present.
10. A copy of each version of the Claim for Death Benefit Form (Form No. SGLV 8283 and any predecessor form) used from 1995 to the present, including any instructions accompanying the form.
11. A copy of each version of the Claim for Family Coverage Death Benefits (Form No. SGLV 8283A and any predecessor form) used from 1995 to the present, including any instructions accompanying the form.
12. A copy of each version of the Servicemembers' Group Life Insurance Election and Certificate form (Form No. SGLV-8286 and any predecessor form) used from 1995 to the present, including any instructions accompanying the form.
13. A copy of each version of the Application for TSGLI Benefits form (Form No. SGLV 8600 and any predecessor form) used from 2005 to the present.
14. A copy of each version of the Servicemembers' and Veterans' Group Life Insurance Handbook from 1995 to the present.
15. A copy of each version of the VA Life Insurance Programs for Veterans and Servicemembers Handbook from 1995 to the present.
16. Documents sufficient to show the number of SGLI, VGLI, FSGLI and TSGLI benefits claims paid for each year from 1995 to the present.
17. Documents sufficient to show the number of SGLI, VGLI, FSGLI and TSGLI benefits claims paid using a lump sum method for each year from 1995 to the present.

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18. Documents sufficient to show the number of SGLI, VGLI, FSGLI and TSGLI benefits claims paid using a monthly installment method, for each year from 1995 to the present.

19. Documents sufficient to show the dollar amount of benefits paid under the SGLI, VGLI, FSGLI and TSGLI programs for each year from 1995 to the present.

20. Documents sufficient to show the number of Alliance Accounts opened for each year from 1995 to the present.

21. Documents sufficient to show the number of Alliance Accounts closed for each year from 1995 to the present.

22. Documents sufficient to show the number of open Alliance Accounts for each year from 1995 to the present.

23. Documents sufficient to show the balances of open Alliance Accounts for each year from 1995 to the present.

24. Documents sufficient to show the interest rate paid to holders of Alliance Accounts for each year from 1995 to the present.

25. Documents sufficient to show the amount of fees the Veterans' Administration pays on an annual basis to Prudential (including OSGLI and Prudential Alliance Account Services) for its administration of the SGLI, VGLI, FSGLI and TSGLI programs.

26. Documents sufficient to show the amount of fees the Veterans' Administration pays on an annual basis to Prudential (including OSGLI and Prudential Alliance Account Services) for its administration of the SGLI, VGLI, FSGLI and TSGLI programs. Please include documents explaining the services rendered for which the fees were charged, including all billing statements sent by Prudential.

27. All documents containing statements by Prudential (including its subdivisions OSGLI and Prudential Alliance Account Services) or the United States government regarding the amount of interest paid to holders of Alliance Accounts, from 1995 to the present.

28. All documents containing statements by Prudential (including its subdivisions OSGLI and Prudential Alliance Account Services) or the United States government regarding the rate of interest paid to holders of Alliance Accounts, from 1995 to the present.

29. Documents sufficient to show the amount of interest earned by Prudential on funds credited to Alliance Accounts for each year from 1995 to the present.

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Page 4

30. All documents containing statements by Prudential (including its subdivisions OSGLI and Prudential Alliance Account Services) regarding the amount of interest it earned on Alliance Accounts, from 1995 to the present.

31. All documents disclosing to SGLI, VGLI, FSGLI or TSGLI beneficiaries that Alliance Account balances are not insured by the Federal Deposit Insurance Corporation.

32. In the August 6, 2010 letter from VA Director of Life Insurance Programs Thomas M. Lastowka's to SGLI and VGLI beneficiaries, Director Lastowka stated "In an effort to better serve beneficiaries, VA in 1999 authorized the use of Prudential's Alliance Accounts as the main method of payment to beneficiaries of SGLI and VGLI programs." Please provide all documents related to and/or reflecting that authorization, including all reports, memoranda, letters, emails and other communications.

33. All letters, emails and other documents in which Prudential or any affiliated company discussed the use of Alliance Accounts to pay SGLI, VGLI, FSGLI or TSGLI benefits.

34. All documents reflecting approval by the United States government of the use of Alliance Accounts to pay SGLI, VGLI, FSGLI or TSGLI benefits.

35. All memoranda, reports, emails, letters and other documents discussing or analyzing the use of Alliance Accounts to pay SGLI, VGLI, FSGLI or TSGLI benefits.

36. All letters, emails and other communications with Prudential (including its subdivisions, OSGLI and Prudential Alliance Account Services), regarding Alliance Accounts.

37. All drafts of the letter sent on or about August 6, 2010 to SGLI and VGLI beneficiaries regarding Alliance Accounts.

38. All emails, letters and other communications with Prudential (including OSGLI and Prudential Alliance Account Services) regarding Director Lastowka's August 6, 2010 letter (including any communications about drafts of that letter).

39. All letters, emails, memoranda, reports and other documents discussing the article, "Fallen Soldiers' Families Denied Cash as Insurers Profit," by David Evans, published by Bloomberg on July 28, 2010.

40. All letters, emails and other communications with Prudential since July 28, 2010.

41. All letters, emails and other communications between Stephen Wurtz, Deputy Assistant Director for Insurance, and Prudential, regarding Alliance Accounts.

42. In the article "Veterans Agency to Probe Insurers on Soldier Benefits," by Tony Capaccio and David Evans (published by Bloomberg on July 29, 2010), it was

August 25, 2010

Page 5

reported that Mike Walcoff, Acting Undersecretary for the Veterans Benefit Administration, announced an investigation regarding "[t]he possibility that life insurance companies are profiting inappropriately" from the SGLI and VGLI programs. Please provide all documents discussing, concerning or related to that investigation, including all emails, letters, correspondence, reports and memoranda.

43. All documents reflecting complaints by SGLI, VGLI, FSGLI or TSGLI beneficiaries about Alliance Accounts or about the drafts issued to beneficiaries to draw on monies contained in Alliance Accounts.
44. All letters, emails and other communications with Open Solutions BIS, Inc., regarding Alliance Accounts.
45. All letters, emails and other communications with JP Morgan Chase Bank, N.A., regarding Alliance Accounts.
46. All letters, emails and other communications with Integrated Payment Systems, Inc., regarding Alliance Accounts.
47. All documents reflecting the results or conclusions of any audit regarding Alliance Accounts.
48. All documents discussing whether providing a SGLI, VGLI, FSGLI or TSGLI beneficiary access to an Alliance Account constitutes a "lump sum" payment.
49. All Prudential insurance policies that set forth the policy terms for SGLI, FSGLI, TSGLI and VGLI policies from 1995 to the present.
50. A copy of each form of insurance certificate issued to persons insured under the SGLI, VGLI, FSGLI and TSGLI programs, from 1995 to the present.
51. All contracts with Open Solutions BIS, Inc. related to SGLI, FSGLI, TSGLI, VGLI or Alliance Accounts.
52. All contracts with JP Morgan Chase Bank, N.A., regarding services (including check clearing services) related to SGLI, FSGLI, TSGLI, VGLI or Alliance Accounts.
53. All contracts with Bisys Information Solutions LP, regarding services (including check clearing services) related to SGLI, FSGLI, TSGLI, VGLI or Alliance Accounts.
54. All contracts with Integrated Payment Systems, Inc., regarding services related to SGLI, FSGLI, TSGLI, VGLI or Alliance Accounts.
55. All contracts with First Data Payment Systems, Inc., regarding services related to SGLI, FSGLI, TSGLI, VGLI or Alliance Accounts.

August 25, 2010

Page 6

Please note that I have sent an identical request to Janet Hardt, FOIA officer for the Philadelphia Regional Office and Insurance Center for the Department of Veterans Affairs. I am not asking that you duplicate efforts. Instead, this letter has been sent to seek only those documents that are not provided by Ms. Hardt.

I agree to pay reasonable duplication fees for the processing of this request, up to a maximum of \$1,000. If you anticipate that the fees will exceed this limit, please phone me prior to incurring them. Please note that, to the extent it facilitates your response to this request and/or reduces the applicable duplication costs, I will accept the documents in Portable Document Format ("PDF") or Tagged Image File Format ("TIFF").

To the extent that this request is denied in whole or in part, please note that I request that such denials be justified by reference to specific exemptions of the Act. I further request that you release all segregable portions of otherwise exempt material.

Should you have any questions or concerns regarding this request, please do not hesitate to call me at (415) 371-8500. Thank you for your assistance.

Very truly yours,


DANIEL A. ZAHEER

DAZ | daz | 58287

K E R R
----- & -----
W A G S T A F F E
L L P
A T T O R N E Y S

100 Spear Street, Suite 1800
San Francisco, California 94105

Telephone (415) 371-8500
Facsimile (415) 371-0500

F a c s i m i l e

To: Frances Hudzik

VETERANS BENEFITS ADMINISTRATION Facsimile: (202) 275-5947

Date: August 25, 2010

From: Daniel A. Zaheer

Re: *Lucey v. Prudential Insurance Company of America*

Pages: Cover+6

- ☐ Urgent
- ☒ For Review
- ☐ Please Comment
- ☐ Please Reply

C o m m e n t s

Please see attached.

C o n f i d e n t i a l i t y N o t i c e

The documents accompanying this facsimile transmission and this Transmittal Sheet contain information that is confidential and privileged. The information is intended to be for the sole use of the individuals or entities named on this Transmittal Sheet. If you are not an intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this telecopied information is prohibited. If you have received this facsimile in error, please notify us by telephone immediately so that we can arrange for the retrieval of the telecopied documents at no cost to you.

If you do not receive all of the pages indicated above, please call us as soon as possible at 415.371.8500.

From: King, Jeanne VBAPHILINS
Sent: Wednesday, April 06, 2011 1:26 PM
To: 'michael@elakeway.com'
Subject: FOIA Request

Dear Mr. Archuleta:

RE: FOIA request you have submitted to our office, FOIA Tracking # 11-04704-F

I apologize for an error in the March 31, 2011 message that was forwarded to you, regarding a recap of our conversation with Steve Wurtz that discussed your FOIA request in detail. Item # 9 from your request was misnumbered as Item # 8 in my message (regarding the SGLI/VGLI Annual Reports). Item # 8 from your request (regarding press releases about the Alliance Account from 1998 to the present) was accidentally omitted.

Enclosed is a listing of the materials that you can expect to receive shortly from our office (for the other items in your request, you agreed to await the results of our current review of internal correspondence that will respond to your request as well as that of FOIA requesters Michael Von Loewenfeldt and Daniel Zaheer).

1--contracts and contract amendments from 1965 to the present regarding the SGLI/VGLI programs; these documents will be electronically forwarded today

4 and 5--a slide deck presentation regarding the June 1998 meeting will be electronically forwarded today

8--any press releases regarding the Alliance Account that can be located, that were released to the public on the VA web site, will be forwarded to you

9--the SGLI/VGLI Annual Reports from 1990--1998 were mailed to your attention via UPS ground shipment this week; you can expect to shortly receive delivery. The Annual Reports from 1999-2010 will be electronically forwarded today.

Sincerely,

Jeanne King

***Jeanne King
FOIA Officer
Insurance Service
Department of Veterans Affairs***

From: King, Jeanne VBAPHILINS
Sent: Tuesday, November 23, 2010 1:24 PM
To: tlaughlin@scott-scott.com
Subject: FOIA Request--Alliance Account Information #1
Attachments: 1998 and 1999 Alliance Acct Discussions from Adv Council.doc; 1998 and 1999 Alliance Acct Discussions from Adv Council.doc

Mr. Thomas Laughlin:

Pursuant to your Freedom of Information (FOIA) request, dated September 16, 2010, I am enclosing the documents that our office previously forwarded to Mr. David Evans at Bloomberg News, in response to his FOIA request of May 27, 2010.

Due to the size of the documents that I will be forwarding to your attention, the information will be sent to you in a series of eight (8) emails. This email is the first of the 8 electronic messages that you will receive today from our office.

Per our conversation of Tuesday, November 23, 2010, electronic transmission of the requested information will be considered sufficient and in lieu of a hard copy response.

The following documentation is enclosed in the first four messages:

- Slide deck regarding Prudential's Alliance Account, dated December 17, 1998 and a similar slide deck dated June 10, 1998.
- A series of e-mails relating to the switchover to the Alliance Account from the period June 1999—December 1999.
- Minutes from the Servicemembers' Group Life Insurance Advisory Council Meetings of 1998 and 1999 in which the Alliance Account issue was discussed.
- The initial Alliance Account package sent to beneficiaries in 1999 (Note: the addressee of the package is fictional).

If you have any questions about any of the enclosed information, you may contact me at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King

Jeanne King
FOIA Officer
Insurance Service
Department of Veterans Affairs

VBAPHILINS

From: King, Jeanne VBAPHILINS
Sent: Wednesday, September 08, 2010 4:22 PM
To: VBAPHILINS
Cc: VBAPHILINS; \ VBAPHILINS
Subject: Another Alliance Account FOIA0--Same Law Firm

Attachments: Michael Loewenfeldt Request 09012.pdf

Barry.
RE: Alliance Account FOIA Request--# 10-11722-F

I was notified today by VACO that they have received another FOIA request regarding the Alliance Account issue (copy attached). This request has 20 questions, emanates from the same law firm as the recent previous one (Kerr & Wagstaffe), but from a different member of their staff (Michael Loewenfeldt). The deadline date for this request (already entered into FOIA Express) is 10-6-2010
Jeanne

From: VBAVACO
Sent: Wednesday, September 08, 2010 2:43 PM
To: King, Jeanne VBAPHILINS
Subject: 2nd request (courtesy copy)



Michael
Loewenfeldt Request 0

Veterans Benefits Administration
Administration Division (20M33)
Management Analyst
Voice: _
Fax: _

VBAPHILINS

From: King, Jeanne VBAPHILINS
Sent: Wednesday, September 08, 2010 3:44 PM
To: VBAPHILINS
Cc: VBAPHILINS; VBAPHILINS
Subject: Zaheer Request in FOIA Express

RE: FOIA Request from attorney Daniel Zaheer regarding the Alliance Account, FOIA # 10-10948-F

I was just notified today that this FOIA request (the one with the 55 questions) has been entered into the FOIA Express database for tracking purposes. The deadline date is 9-24-2010.

Jeanne

VBAPHILINS

From: King, Jeanne VBAPHILINS

Sent: Tuesday, September 14, 2010 5:32 PM

To: VBAPHILINS

Cc: VBAPHILINS; VBAPHILINS; VBAPHILINS

Subject: Evans Request Now in FOIA Express

FYI

The original FOIA request from David Evans (FOIA Express # 10-11909-F) has now been established, inputted (with all important documents uploaded), and officially closed in the VACO tracking database FOIA Express.

Jeanne

01/13/2012

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

11-04704-F - Amend Request (Granted in full)

Sign Out ▾

General Information		Request Information		Fee Information		Additional Information	
Action Office*		Status	Closed - Granted in full				
Request Type*		Primary User	King, Jeanne				
Requester*	Archuleta, Michael	Review Status	-				
Organization	Law Offices of Michael Archu..	Priority	Normal ▾				
Received Mode	Mail ▾	Multi-Track Type	Complex ▾				
Delivery Mode	E-mail ▾	Shipping Address					
Method of Payment		Address1	P. O. Box 340639				
Requested Date*	02/18/2011 ▾	Address2					
Original Received Date	02/25/2011 ▾	City	Austin				
Received Date*	02/25/2011 ▾	Country	United States ▾				
Original Target Date	03/25/2011 ▾	State	Texas ▾				
Target Date	03/25/2011 ▾	Zip Code	78734				
Estimated Delivery Date	03/25/2011 ▾	[12345 or 12345-6789 format for US]					
Original Perfect Date	03/31/2011 ▾						
Last Perfected Date	04/06/2011 ▾	Link Requests					
Closed Date	04/22/2011	Link Requests					
<input type="checkbox"/> Expedite Requested Expedite reason		Notes					
		Some of the records were released in full to the requester; for the remainder of the records requested, Mr. Archuleta agreed to obtain records from FOIA requesters Daniel Zaheer and Michael Von Lo (FOIA # 10-11722-F and # 10-10948-F).					

Note: * fields are mandatory

FOIA # 11-04704-F

FOIA Request from requester
Michael Archuleta

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

11-04704-F - Amend Request (Granted in full)[Sign Out](#)

[General Information](#) | [Request Information](#) | [Fee Information](#) | [Additional Information](#)

☐ **Modify Description***

Requester has asked for various records related to the Servicemembers' and Veterans' Group Life Insurance (SGLI/VGLI) programs, in particular records that pertain to the Alliance Account feature of the insurance programs.

+ Show Description History (1)

Sub Requests*

Default

Other Address

Name

Address1

Organization

Address2

Phone

City

Fax

Country

Email

State

Zip Code

United States

[12345 or 12345-6789 format for US]

Note: * fields are mandatory

Action	Comment	Action Taken By	Action Date/Time
Closed		King, Jeanne	04/28/2011 12:22:24 PM
Amendment Request	Add a note	King, Jeanne	04/28/2011 12:20:46 PM
Amended		King, Jeanne	04/28/2011 12:20:46 PM
Close Request	Some of the records were released in full to the requester; for the remainder of the records requested, Mr. Archuleta agreed to obtain those records from FOIA requesters Daniel Zaheer and Michael Von Loewenfeldt (FOIA # 10-11722-F and # 10-10948-F).	King, Jeanne	04/28/2011 12:19:46 PM
Closed		King, Jeanne	04/28/2011 12:19:46 PM
Final Disposition	Reportable Disposition has been set to 'Granted in full' for the case '11-04704-F'	King, Jeanne	04/28/2011 12:16:06 PM
Final Actions		King, Jeanne	04/28/2011 12:16:06 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Response to Requester' for the request '11-04704-F'	King, Jeanne	04/26/2011 12:47:53 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '11-04704-F'	King, Jeanne	04/26/2011 12:47:10 PM
Perfected		King, Jeanne	04/05/2011 11:47:36 AM
Assigned		King, Jeanne	04/05/2011 11:36:08 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '11-04704-F'	King, Jeanne	04/05/2011 11:31:25 AM
Assigned		King, Jeanne	04/05/2011 11:31:24 AM
Received		King, Jeanne	04/05/2011 11:31:24 AM

Report Date: 03/20/2012

Time: 2:46:04 PM

Request Details Report**Request Information:**

Request # : 11-04704-F
Action Office : VBA
Request Type : FOIA
Reference : -
Requested Date : 02/18/2011
Original Received Date : 02/25/2011
Received Date : 02/25/2011
Original Perfected Date : 03/31/2011
Last Perfected Date : 04/06/2011
Disposition Accepted Date : 04/22/2011
Delivery Date : -
Closed Date : 04/22/2011
Original Target Date : 03/25/2011
Target Date : 03/25/2011
Estimated Delivery Date : 03/25/2011
Total Days on Hold : 0
Days Remaining : N/A
Processed Days : 40
Delivery Mode : E-mail
Multi-Track Type : Complex
Priority : Normal
Request Status : Closed
Final Disposition : Granted in full
Denial Authority : -
Expedite Requested : No
Expedite Status : -
Expedite Description : -
Adjudicate Days (Expedite) : -

Custom Fields:**Responsible Facilities**

Facility : VBA 310A - Philadelphia Insurance Center

Description of the Request :

Requester has asked for various records related to the Servicemembers' and Veterans' Group Life Insurance (SGLI/VGLI) programs, in particular records that pertain to the Alliance Account feature of the Insurance programs.

Sub-requests :

Default

Request Details Report

Page 3 of 6

E-Mail : -

Action History :

Action	Comment	Action Taken By	Action Date/Time
Closed		King, Jeanne	04/28/2011 12:22:24 PM
Amendment Request	Add a note	King, Jeanne	04/28/2011 12:20:46 PM
Amended		King, Jeanne	04/28/2011 12:20:46 PM
Close Request	Some of the records were released in full to the requester; for the remainder of the records requested, Mr. Archuleta agreed to obtain those records from FOIA requesters Daniel Zaheer and Michael Von Loewenfeldt (FOIA # 10-11722-F and # 10-10948-F).	King, Jeanne	04/28/2011 12:19:46 PM
Closed		King, Jeanne	04/28/2011 12:19:46 PM
Final Disposition	Reportable Disposition has been set to 'Granted In full' for the case '11-04704-F'	King, Jeanne	04/28/2011 12:16:06 PM
Final Actions		King, Jeanne	04/28/2011 12:16:06 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Response to Requester' for the request '11-04704-F'	King, Jeanne	04/26/2011 12:47:53 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '11-04704-F'	King, Jeanne	04/26/2011 12:47:10 PM
Perfected		King, Jeanne	04/05/2011 11:47:36 AM
Assigned		King, Jeanne	04/05/2011 11:36:08 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '11-04704-F'	King, Jeanne	04/05/2011 11:31:25 AM
Assigned		King, Jeanne	04/05/2011 11:31:24 AM
Received		King, Jeanne	04/05/2011 11:31:24 AM

Assign:

Assigned By	: King, Jeanne	
Assigned Date	: 04/05/2011	
Assigned To	: <u>User/Group</u>	<u>Action Office</u>
	King, Jeanne (Primary)	VBA
	FX Admin	OIA&T
Comments	: -	

Perfect:

Perfect By	: King, Jeanne
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Original Perfected Date : 03/31/2011
 Last Perfected By : King, Jeanne
 Last Perfected Date : 04/06/2011
 Comments : -

Link Cases :

Request #	Request Type	Requester Name	Primary User	Received Date	Target Date	Request Status
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No link cases found

FOIA Documents Details (in Case Folder):

File Cabinet Drawer	Folder Name	Disposition	Layer Name	No. of Pages	Date Added	Redaction Codes	Document Review Status
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No folders have been added to this case.

FOIA Documents Details (in Review Log):

File Cabinet Drawer	Folder Name	Disposition	Comments	No. of Pages	Date Added	Redaction Codes
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No folders have been added to this case.

Page Details:

of pages attached to case folder : 0
 # of pages attached to case folder with partial redactions : 0
 # of pages attached to case folder with full redactions : 0
 # of pages attached to case folder without redactions : 0
 # of documents delivered : 0

	Generated Count	Adjusted Count
# of pages reviewed	0	0
# of pages delivered	0	0

Partially Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
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No Page with partial redactions was added to this case.

Fully Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
----------------	-------------	-------------------

No Page with full redactions was added to this case

Manually - Partially Applied Redaction Code Details:

Redaction Code	Description
----------------	-------------

No partially applied redaction code details found

Manually - Fully Applied Redaction Code Details:

Redaction Code	Description
----------------	-------------

No fully applied redaction code details found

Manually Applied - Other Redaction Code Details:

Redaction Code	Description
No other applied redaction code details found	

Fee Details :

Payment Status	: No Charges
Invoice Amount	: \$ 0.00
Invoice Number	: -
Invoice Date	: -
Cost Estimated	: \$ 0.00
Cost Not Charged by the Agency	: \$ 0.00
Total Amount Paid	: \$ 0.00
Balance Amount	: \$ 0.00
Amount Requester Willing to Pay	: \$ 500.00
Fee Waiver Requested	: No
Fee Waiver Status	: -
Adjudicate Days (Fee Waiver)	: -

Fee Details Description:

Fee Items	Charge Type	Unit Rate (\$)	Quantity	Extended Value (\$)
No Fee Details have been Found for this Request.				

Work Hours :

Program Office	Created By	Rate	Hours	Total Cost	Comments
No Work Hours details found.					

Transfer Details:

Transfer To	Transfer By	Transfer Date	Comment
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Correspondence Log :

Date	Letter Description	User	Status	Mode	eSigned?	E-mail
04/05/2011	Request Description	King, Jeanne	Received	Mail	No	
04/26/2011	FOIA Information for Requester	King, Jeanne	Received	E-mail	No	
04/26/2011	Final FOIA Response to Requester	King, Jeanne	Received	Mail	No	

Consultation Review Log :

Review ID	Location(s) Referred	Due Date	Created Date	Imported Date	Disposition Accepted Date	Status
No consultation review log records found						

Requests For Documents:

ID	Location(s) Referred	Request Date	Due Date	Status
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No Request For Documents log details found

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-12312-F - Amend Request (Granted/Denied in Part)

Sign Out ▾

General Information**Request Information****Fee Information****Additional Information**

Action Office*

Request Type*

Requester*

Organization

Received Mode

Delivery Mode

Method of Payment

Requested Date*

Original Received Date

Received Date*

Original Target Date

Target Date

Estimated Delivery Date

Original Perfect Date

Last Perfected Date

Closed Date

Status

Primary User

Review Status

Priority

Multi-Track Type

Shipping Address

Address1

Address2

City

Country

State

Zip Code

[12345 or 12345-6789 format for US]

Closed - Granted/Denied in Part

King, Jeanne

13. Disposition letter sent..

Normal ▾

Complex ▾

500 Fifth Avenue, 40th Floor

New York

United States ▾

New York ▾

10110

Link Requests

Link Requests

☐ Expedite Requested
Expedite reason

Notes

Note: * fields are mandatory

FOIA #10-12312-F
FOIA Request from requester
Thomas Laughlin, attorney at
Scott and Scott Law Firm

Action	Comment	Action Taken By	Action Date/Time
Correspondence	Saved received correspondence letter of type Request with subject 'Final Response to Requester' for the request '10-12312-F'	King, Jeanne	04/13/2011 03:01:51 PM
Assigned			03/21/2011 12:40:16 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Case Modification Letter' for the request '10-12312-F'		03/21/2011 12:39:32 PM
Assigned			03/21/2011 12:38:48 PM
Assigned			03/14/2011 03:09:12 PM
Assigned			03/14/2011 03:06:23 PM
Close Request	closed		03/08/2011 10:04:59 AM
Closed			03/08/2011 10:04:59 AM
Amendment Request	Insurance Center needs to provide response.		11/18/2010 11:11:07 AM
Amended			11/18/2010 11:11:07 AM
Assigned			11/18/2010 11:10:45 AM
Closed			11/18/2010 11:06:20 AM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied in Part' for the case '10-12312-F'		11/18/2010 11:06:08 AM
Final Actions			11/18/2010 11:06:08 AM
Perfected			11/18/2010 11:03:07 AM
Correspondence	Saved received correspondence letter of type Request with subject '20M33 Response Letter 11/18/2010' for the request '10-12312-F'		11/18/2010 11:02:50 AM
Correspondence	Saved received correspondence letter of type Request with subject 'E-mail Traffic 9/30/2010' for the request '10-12312-F'		09/30/2010 01:24:14 PM
Assigned			09/29/2010 03:55:47 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-12312-F'		09/29/2010 03:52:53 PM
Assigned			09/29/2010 03:52:50 PM
Received			09/29/2010 03:52:50 PM

Report Date: 03/20/2012

Time: 2:51:19 PM

Request Details Report**Request Information:**

Request # : 10-12312-F
Action Office : VBA
Request Type : FOIA
Reference : -
Requested Date : 09/16/2010
Original Received Date : 09/29/2010
Received Date : 09/29/2010
Original Perfected Date : 11/18/2010
Last Perfected Date : 11/18/2010
Disposition Accepted Date : 11/18/2010
Delivery Date : -
Closed Date : 11/18/2010
Original Target Date : 10/28/2010
Target Date : 10/28/2010
Estimated Delivery Date : 10/28/2010
Total Days on Hold : 0
Days Remaining : N/A
Processed Days : 34
Delivery Mode : Mail
Multi-Track Type : Complex
Priority : Normal
Request Status : Closed
Final Disposition : Granted/Denied In Part
Denial Authority : -
Expedite Requested : No
Expedite Status : -
Expedite Description : -
Adjudicate Days (Expedite) : -

Custom Fields:**Responsible Facilities**

Facility : VBA 101 - VA Central Office (VACO)

Description of the Request :

Please provide me with all the documents pertaining to Servicemembers' Group Life Insurance ("SGLI") and Veterans' Group Life Insurance ("VGLI") that were recently provided to the Bloomberg News Service ("Bloomberg") in response to its FOIA request. The documents I seek are described in the attached Bloomberg article, dated September 14, 2010. Among other things, it appears that the VA provided Bloomberg with: (1) The amendment to the SGLI/VGLI life insurance contract between the VA and the Prudential Life Insurance Co. ("Prudential"), dated September 1, 2009; (2) The original SGLI/VGLI life insurance contract between the VA and Prudential dated 1965; (3) The amended SGLI/VGLI life insurance contract between the VA and Prudential, dated 2007; (4) The amended

SGLI/VGLI life insurance contract between the VA and Prudential, dated September 2009; (5) An email from TL, the VA's director for insurance, to SW, the agency's deputy assistant director for insurance, concerning SGLI/VGLI, dated June 9, 1999; (6) A presentation from Prudential to the VA concerning SGLI/VGLI, dated June 10, 1998. The foregoing is an illustrative list of the documents that I seek, garnered from the attached Bloomberg article. I seek to be provided with the entirety of the documents provided to Bloomberg. In addition, please provide all documents that comprise the full investigation (including without limitation interview notes, all documents inspected and created, draft press releases, and all e-mails that were reviewed) of the VA life insurance program purportedly begun on July 28, 2010 that resulted in the change of policy regarding payment of life insurance benefits announced by the VA on September 15, 2010.

Sub-requests :

Default

Requester Information:

Requester Name : Laughlin, Thomas
Job Title : Attorneys At Law
Created Date : 09/29/2010
Requester Login : -
Requester Type : All Other
Organization : Scott & Scott, LLP
Work Phone 1 : 212-223-6444
Work Phone 2 : -
Mobile : -
Fax : 212-223-6334
E-Mail : scottlaw@scott-scott.com

Address:

Address 1 : 500 Fifth Avenue, 40th Floor
Address 2 : -
City : New York
State : New York
Country : United States
Zip Code : 10110

Billing Address:

Address 1 : 500 Fifth Avenue, 40th Floor
Address 2 : -
City : New York
State : New York
Country : United States
Zip Code : 10110

Shipping Address:

Address 1 : 500 Fifth Avenue, 40th Floor
Address 2 : -
City : New York
State : New York
Country : United States
Zip Code : 10110

Name : -
 Organization : -
 Address 1 : -
 Address 2 : -
 City : -
 State : -
 Country : United States
 Zip Code : -
 Phone : -
 Fax : -
 E-Mail : -

Action History :

Action	Comment	Action Taken By	Action Date/Time
Correspondence	Saved received correspondence letter of type Request with subject 'Final Response to Requester' for the request '10-12312-F'	King, Jeanne	04/13/2011 03:01:51 PM
Assigned			03/21/2011 12:40:16 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Case Modification Letter' for the request '10-12312-F'		03/21/2011 12:39:32 PM
Assigned			03/21/2011 12:38:48 PM
Assigned			03/14/2011 03:09:12 PM
Assigned			03/14/2011 03:06:23 PM
Close Request	closed	Hudzik, Frances	03/08/2011 10:04:59 AM
Closed		Hudzik, Frances	03/08/2011 10:04:59 AM
Amendment Request	Insurance Center needs to provide response.		11/18/2010 11:11:07 AM
Amended			11/18/2010 11:11:07 AM
Assigned			11/18/2010 11:10:45 AM
Closed			11/18/2010 11:06:20 AM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied in Part' for the case '10-12312-F'		11/18/2010 11:06:08 AM
Final Actions			11/18/2010 11:06:08 AM
Perfected			11/18/2010 11:03:07 AM
Correspondence	Saved received correspondence letter of type Request with subject '20M33 Response Letter 11/18/2010' for the request '10-12312-F'		11/18/2010 11:02:50 AM
Correspondence	Saved received correspondence letter of type Request with subject		09/30/2010

	'E-mail Traffic 9/30/2010' for the request '10-12312-F'	01:24:14 PM
Assigned		09/29/2010 03:55:47 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-12312-F'	09/29/2010 03:52:53 PM
Assigned		09/29/2010 03:52:50 PM
Received		09/29/2010 03:52:50 PM

Assign:

Assigned By	: Dixon, Chiquita	
Assigned Date	: 03/21/2011	
Assigned To	: <u>User/Group</u>	<u>Action Office</u>
	King, Jeanne (Primary)	VBA
	FX Admin	OI&T
		VBA
		VBA

Comments : -

Perfect:

Perfected By :
 Original Perfected Date : 11/18/2010
 Last Perfected By :
 Last Perfected Date : 11/18/2010
 Comments : -

Link Cases :

Request #	Request Type	Requester Name	Primary User	Received Date	Target Date	Request Status
No link cases found						

FOIA Documents Details (In Case Folder):

File Cabinet Drawer	Folder Name	Disposition	Layer Name	No. of Pages	Date Added	Redaction Codes	Document Review Status
No folders have been added to this case.							

FOIA Documents Details (In Review Log):

File Cabinet Drawer	Folder Name	Disposition	Comments	No. of Pages	Date Added	Redaction Codes
No folders have been added to this case.						

Page Details:

of pages attached to case folder : 0
 # of pages attached to case folder with partial redactions : 0

of pages attached to case folder with full redactions : 0
 # of pages attached to case folder without redactions : 0
 # of documents delivered : 0

	Generated Count	Adjusted Count
# of pages reviewed	0	0
# of pages delivered	0	0

Partially Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with partial redactions was added to this case.	

Fully Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with full redactions was added to this case	

Manually - Partially Applied Redaction Code Details:

Redaction Code	Description
(b)(5)	Permits withholding information under the deliberative process privilege, including the pre-decisional documents, or information that could be withheld under civil discovery, attorney-client, or attorney-work product privileges.

Manually - Fully Applied Redaction Code Details:

Redaction Code	Description
	No fully applied redaction code details found

Manually Applied - Other Redaction Code Details:

Redaction Code	Description
	No other applied redaction code details found

Fee Details :

Payment Status : No Charges
 Invoice Amount : \$ 0.00
 Invoice Number : -
 Invoice Date : -
 Cost Estimated : \$ 0.00
 Cost Not Charged by the Agency : \$ 0.00
 Total Amount Paid : \$ 0.00
 Balance Amount : \$ 0.00
 Amount Requester Willing to Pay : \$ 1,000.00
 Fee Waiver Requested : No
 Fee Waiver Status : -
 Adjudicate Days (Fee Waiver) : -

Fee Details Description:

Fee Items	Charge Type	Unit Rate (\$)	Quantity	Extended Value (\$)
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No Fee Details have been Found for this Request.

Work Hours :

Program Office	Created By	Rate	Hours	Total Cost	Comments
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No Work Hours details found.

Transfer Details:

Transfer To	Transfer By	Transfer Date	Comment
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Correspondence Log :

Date	Letter Description	User	Status	Mode	eSigned?	E-mail
09/29/2010	Request Description		Received	Mail	No	
09/30/2010	E-mail Traffic 9/30/2010		Received	Other	No	
11/18/2010	20M33 Response Letter 11/18/2010		Received	Other	No	
03/21/2011	Case Modification Letter		Received	Other	No	
04/13/2011	Final Response to Requester	King, Jeanne	Received	E-mail	No	

Consultation Review Log :

Review ID	Location(s) Referred	Due Date	Created Date	Imported Date	Disposition	Accepted Date	Status
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No consultation review log records found

Requests For Documents:

ID	Location(s) Referred	Request Date	Due Date	Status
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No Request For Documents log details found

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-11722-F - Amend Request (Granted/Denied in Part)

Sign Out ▾

General Information	Request Information	Fee Information	Additional Information
Action Office*	SEA	Status	Closed - Granted/Denied in Part
Request Type*	FOIA	Primary User	King, Jeanne
Requester*	Von Loewenfeldt, Michael	Review Status	
Organization	Kerr & Wagstaffe LLP	Priority	Normal ▾
Received Mode	Fax ▾	Multi-Track Type	Complex ▾
Delivery Mode	Mail ▾	Shipping Address	
Method of Payment		Address1	100 Spear Street
Requested Date*	09/02/2010 <input type="checkbox"/>	Address2	Suite 1800
Original Received Date	09/08/2010 <input type="checkbox"/>	City	San Francisco
Received Date*	12/16/2010	Country	United States ▾
Original Target Date	10/06/2010	State	California ▾
Target Date	01/18/2011 <input type="checkbox"/>	Zip Code	91105
Estimated Delivery Date	04/20/2011 <input type="checkbox"/>	[12345 or 12345-6789 format for US]	
Original Perfect Date	12/16/2010 <input type="checkbox"/>	Link Requests	
Last Perfected Date	12/16/2010 <input type="checkbox"/>	Link Requests	
Closed Date	04/20/2011	Notes	
<input type="checkbox"/> Expedite Requested		FOIA extent was granted to the maximum extent possible (hard documents were released). However, some electronic records v release to the requester under FOIA Exemption #5.	
Expedite reason		Put on hold due to fees on 9/23/10 per the request of Vicki. RT	

see attached page
for complete note
printout

Note: * fields are mandatory

FOIA #10-11722-F
FOIA Request from requester
Michael Von Loewenfeldt @ law firm
Kerr and Wagstaffe

FOIA # 11722-F

FOIA Request from Michael Von Loewenfeldt at law firm Kerr & Wagstaffe

Notes

FOIA extent was granted to the maximum extent possible (hard copy documents were released). However, some electronic records were denied release to the requester under FOIA Exemption #5.

Put on hold due to fees on 9/23/10 per the request of Vicki. RT

Clarification letter rec'd on 9/30/10 from JC. RT

Sent Response to JC on 9/30/10. RT

Sent clarification of check letter on 10/5/10 and faxed General Counsel and copy of letter as well. RT

Received clarification of check letter from requester on 10/5/10. RT

Letter by mail on 10/15/10

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-11722-F - Amend Request (Granted/Denied in Part)

Sign Out ▾

General Information | Request Information | **Fee Information** | Additional Information |

Willing Amount \$ 25.00
Requester Type All Other
☐ Fee Waiver Requested
Fee Waiver Request Reason

Cost Details

Work Hours	\$0.00
Total Extended Cost	\$0.00
Amount Charged to Requester	\$0.00
Amount Incurred	\$0.00
Amount Paid	\$0.00
Balance	\$0.00
Payment Status	No Charges

Billing Address

Address1 100 Spear Street
Address2 Suite 1800
City San Francisco
Country United States ▾
State California ▾
Zip Code 91105
[12345 or 12345-6789 format for US]

Current Invoice Details

Invoice Amount \$0.00
Invoice Number -
Invoice Date -

Action	Comment	Action Taken By	Action Date/Time
Closed		King, Jeanne	04/28/2011 12:01:48 PM
Amendment Request	Add a note	King, Jeanne	04/28/2011 11:59:35 AM
Amended		King, Jeanne	04/28/2011 11:59:35 AM
Close Request	Released some records to the requester; denied release of other records to the requester under FOIA Exemption # 5.	King, Jeanne	04/28/2011 11:55:00 AM
Closed		King, Jeanne	04/28/2011 11:55:00 AM
Estimated Delivery Date	Estimated Delivery Date has been changed from '10/06/2010' to '04/20/2011' for the Request '10-11722-F'.	King, Jeanne	04/28/2011 11:53:45 AM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied in Part' for the case '10-11722-F'	King, Jeanne	04/28/2011 11:49:01 AM
Final Actions		King, Jeanne	04/28/2011 11:49:01 AM
Start the Clock	Start clock is set on '12/16/2010' with target date '01/18/2011' and received date '12/16/2010'.	King, Jeanne	04/28/2011 11:45:44 AM
Target date changed	Target date has been changed from '10/06/2010' to '01/18/2011' for the Request '10-11722-F' due to start the clock	King, Jeanne	04/28/2011 11:45:44 AM
Perfected		King, Jeanne	04/28/2011 11:45:44 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Response to Requester' for the request '10-11722-F'	King, Jeanne	04/26/2011 12:38:17 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '10-11722-F'	King, Jeanne	04/26/2011 12:37:25 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Letter by mail on 10/15/10' for the request '10-11722-F'		10/15/2010 07:12:18 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Copy of Receipts of Check' for the request '10-11722-F'		10/13/2010 01:45:36 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter from requester on 10/5/10. RT' for the request '10-11722-F'		10/05/2010 03:31:42 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter on 10/5/10. RT' for the request '10-11722-F'		10/05/2010 03:21:58 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Fee letter and checks' for the request '10-11722-F'		10/04/2010 02:27:26 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Response to JC on 9/30/10' for the request '10-11722-F'		09/30/2010 03:30:14 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Additional E-mail Traffic from Vicki' for the request '10-11722-F'		09/30/2010 01:56:58 PM
Correspondence	Saved received correspondence letter of type Request with subject 'E-mail Traffic on 9/30/10' for the request '10-11722-F'		09/30/2010 01:20:38 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter' for the request '10-11722-F'		09/30/2010 08:22:22 AM
On Hold-Need Info/Clarification	On hold due to fees.		09/23/2010 07:59:03 AM
Stop the Clock	Stop clock is set on '09/23/2010'.		09/23/2010 07:59:03 AM

On Hold-Need Info/Clarification	
Assigned	
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-11722-F'
Assigned	
Received	

AM
09/23/2010 07:59:03
AM
09/08/2010 03:07:46
PM
09/08/2010 03:05:11
PM
09/08/2010 03:05:08
PM
09/08/2010 03:05:08
PM

Report Date: 03/20/2012

Time: 2:39:48 PM

Request Details Report**Request Information:**

Request # : 10-11722-F
Action Office : VBA
Request Type : FOIA
Reference : -
Requested Date : 09/02/2010
Original Received Date : 09/08/2010
Received Date : 12/16/2010
Original Perfected Date : 12/16/2010
Last Perfected Date : 12/16/2010
Disposition Accepted Date : 04/20/2011
Delivery Date : -
Closed Date : 04/20/2011
Original Target Date : 10/06/2010
Target Date : 01/18/2011
Estimated Delivery Date : 04/20/2011
Total Days on Hold : 0
Days Remaining : N/A
Processed Days : 86
Delivery Mode : Mail
Multi-Track Type : Complex
Priority : Normal
Request Status : Closed
Final Disposition : Granted/Denied in Part
Denial Authority : -
Expedite Requested : No
Expedite Status : -
Expedite Description : -
Adjudicate Days (Expedite) : -

Custom Fields:**Responsible Facilities**

Facility : VBA 101 - VA Central Office (VACO)

Description of the Request :

SGLI, VGLI, FSGLI, and TSGLI data

Sub-requests :

Default

Requester Information:

Requester Name : Von Loewenfeldt, Michael
Job Title : -
Created Date : 09/03/2010
Requester Login : -
Requester Type : All Other
Organization : Kerr & Wagstaffe LLP
Work Phone 1 : 415-371-8500
Work Phone 2 : -
Mobile : -
Fax : 415-371-0500
E-Mail : MVL@KERRWAGSTAFFE.COM

Address:

Address 1 : 100 Spear Street
Address 2 : Suite 1800
City : San Francisco
State : California
Country : United States
Zip Code : 91105

Billing Address:

Address 1 : 100 Spear Street
Address 2 : Suite 1800
City : San Francisco
State : California
Country : United States
Zip Code : 91105

Shipping Address:

Address 1 : 100 Spear Street
Address 2 : Suite 1800
City : San Francisco
State : California
Country : United States
Zip Code : 91105

Other Address:

Name : -
Organization : -
Address 1 : -
Address 2 : -
City : -
State : -
Country : United States
Zip Code : -
Phone : -
Fax : -
E-Mail : -

Action History :

Action	Comment	Action Taken By	Action Date/Time
Closed		King, Jeanne	04/28/2011 12:01:48 PM
Amendment Request	Add a note	King, Jeanne	04/28/2011 11:59:35 AM
Amended		King, Jeanne	04/28/2011 11:59:35 AM
Close Request	Released some records to the requester; denied release of other records to the requester under FOIA Exemption # 5.	King, Jeanne	04/28/2011 11:55:00 AM
Closed		King, Jeanne	04/28/2011 11:55:00 AM
Estimated Delivery Date	Estimated Delivery Date has been changed from '10/06/2010' to '04/20/2011' for the Request '10-11722-F'.	King, Jeanne	04/28/2011 11:53:45 AM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied in Part' for the case '10-11722-F'	King, Jeanne	04/28/2011 11:49:01 AM
Final Actions		King, Jeanne	04/28/2011 11:49:01 AM
Start the Clock	Start clock is set on '12/16/2010' with target date '01/18/2011' and received date '12/16/2010'.	King, Jeanne	04/28/2011 11:45:44 AM
Target date changed	Target date has been changed from '10/06/2010' to '01/18/2011' for the Request '10-11722-F' due to start the clock	King, Jeanne	04/28/2011 11:45:44 AM
Perfected		King, Jeanne	04/28/2011 11:45:44 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Response to Requester' for the request '10-11722-F'	King, Jeanne	04/26/2011 12:38:17 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '10-11722-F'	King, Jeanne	04/26/2011 12:37:25 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Letter by mail on 10/15/10' for the request '10-11722-F'		10/15/2010 07:12:18 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Copy of Receipts of Check' for the request '10-11722-F'		10/13/2010 01:45:36 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter from requester on 10/5/10. RT' for the request '10-11722-F'		10/05/2010 03:31:42 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter on 10/5/10. RT' for the request '10-11722-F'		10/05/2010 03:21:58 PM
Correspondence	Saved received correspondence letter of type Request with subject		10/04/2010

	'Fee letter and checks' for the request '10-11722-F'	02:27:26 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Response to JC on 9/30/10' for the request '10-11722-F'	09/30/2010 03:30:14 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Additional E-mail Traffic from Vicki' for the request '10-11722-F'	09/30/2010 01:56:58 PM
Correspondence	Saved received correspondence letter of type Request with subject 'E-mail Traffic on 9/30/10' for the request '10-11722-F'	09/30/2010 01:20:38 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter' for the request '10-11722-F'	09/30/2010 08:22:22 AM
On Hold-Need Info/Clarification	On hold due to fees.	09/23/2010 07:59:03 AM
Stop the Clock	Stop clock is set on '09/23/2010'.	09/23/2010 07:59:03 AM
On Hold-Need Info/Clarification		09/23/2010 07:59:03 AM
Assigned		09/08/2010 03:07:46 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-11722-F'	09/08/2010 03:05:11 PM
Assigned		09/08/2010 03:05:08 PM
Received		09/08/2010 03:05:08 PM

Assign:

Assigned By	:		
Assigned Date	:	09/08/2010	
Assigned To	:	<u>User/Group</u> King, Jeanne (Primary) FX Admin	<u>Action Office</u> VBA OI&T VBA
Comments	:	-	

Perfect:

Perfected By	:	King, Jeanne
Original Perfected Date	:	12/16/2010
Last Perfected By	:	King, Jeanne
Last Perfected Date	:	12/16/2010
Comments	:	-

Link Cases :

Request #	Request Type	Requester Name	Primary User	Received Date	Target Date	Request Status
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No link cases found

FOIA Documents Details (In Case Folder):

File Cabinet Drawer	Folder Name	Disposition	Layer Name	No. of Pages	Date Added	Redaction Codes	Document Review Status
------------------------	-------------	-------------	------------	--------------	------------	--------------------	------------------------------

No folders have been added to this case.

FOIA Documents Details (In Review Log):

File Cabinet Drawer	Folder Name	Disposition	Comments	No. of Pages	Date Added	Redaction Codes
------------------------	-------------	-------------	----------	-----------------	---------------	--------------------

No folders have been added to this case.

Page Details:

# of pages attached to case folder	: 0
# of pages attached to case folder with partial redactions	: 0
# of pages attached to case folder with full redactions	: 0
# of pages attached to case folder without redactions	: 0
# of documents delivered	: 0

	Generated Count	Adjusted Count
# of pages reviewed	0	0
# of pages delivered	0	0

Partially Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with partial redactions was added to this case.	

Fully Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with full redactions was added to this case	

Manually - Partially Applied Redaction Code Details:

Redaction Code	Description
(b)(5)	Permits withholding information under the deliberative process privilege, including the pre-decisional documents, or information that could be withheld under civil discovery, attorney-client, or attorney-work product privileges.

Manually - Fully Applied Redaction Code Details:

Redaction Code	Description
	No fully applied redaction code details found

Manually Applied - Other Redaction Code Details:

Redaction Code	Description
	No other applied redaction code details found

Fee Details :

Request Details Report

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Payment Status : No Charges
 Invoice Amount : \$ 0.00
 Invoice Number : -
 Invoice Date : -
 Cost Estimated : \$ 0.00
 Cost Not Charged by the Agency : \$ 0.00
 Total Amount Paid : \$ 0.00
 Balance Amount : \$ 0.00
 Amount Requester Willing to Pay : \$ 25.00
 Fee Waiver Requested : No
 Fee Waiver Status : -
 Adjudicate Days (Fee Waiver) : -

Fee Details Description:

Fee Items	Charge Type	Unit Rate (\$)	Quantity	Extended Value (\$)
-----------	-------------	----------------	----------	---------------------

No Fee Details have been Found for this Request.

Work Hours :

Program Office	Created By	Rate	Hours	Total Cost	Comments
----------------	------------	------	-------	------------	----------

No Work Hours details found.

Transfer Details:

Transfer To	Transfer By	Transfer Date	Comment
-------------	-------------	---------------	---------

Correspondence Log :

Date	Letter Description	User	Status	Mode	eSigned?	E-mail
09/08/2010	Request Description		Received	Fax	No	
09/30/2010	Clarification Letter		Received	Other	No	
09/30/2010	E-mail Traffic on 9/30/10		Received	Other	No	
09/30/2010	Additional E-mail Traffic from Vicki		Received	Other	No	
09/30/2010	Response to JC on 9/30/10		Received	Other	No	
10/04/2010	Fee letter and checks		Received	Other	No	
10/05/2010	Clarification of check letter on 10/5/10. RT		Received	Other	No	
10/05/2010	Clarification of check letter from requester on 10/5/10. RT		Received	Other	No	
10/13/2010	Copy of Receipts of Check		Received	Other	No	
10/15/2010	Letter by mail on 10/15/10		Received	Other	No	
	FOIA Information for					

Request Details Report

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04/26/2011	Requester	King, Jeanne	Received	Mail	No
04/26/2011	Final FOIA Response to Requester	King, Jeanne	Received	Mail	No

Consultation Review Log :

Review ID	Location(s) Referred	Due Date	Created Date	Imported Date	Disposition	Accepted Date	Status
No consultation review log records found							

Requests For Documents:

ID	Location(s) Referred	Request Date	Due Date	Status
No Request For Documents log details found				

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-10948-F - Request (Granted/Denied in Part)

Sign Out

General Information**Request Information****Fee Information****Additional Information**

Action Office*

Request Type*

Requester*

Organization

Received Mode

Delivery Mode

Method of Payment

Requested Date*

Original Received Date

Received Date*

Original Target Date

Target Date

Estimated Delivery Date

Original Perfect Date

Last Perfected Date

Closed Date

Status

Primary User

Review Status

Priority

Multi-Track Type

Shipping Address

Address1

Address2

City

Country

State

Zip Code

(12345 or 12345-6789 format for US)

Closed - Granted/Denied in Part

King, Jeanne

Normal

Complex

100 Spear Street, Suite 1800

San Francisco

United States

California

94105

Link Requests

Link Requests

☐ Expedite Requested

Expedite reason

Notes

FOIA request was granted to the maximum extent possible (hard documents were released). However, some electronic records were release to the requester under FOIA Exemption # 5.

Put on hold due to fees on 9/23/10 per the request of Vicki. RT

see attached Word doc
for complete Notes
section reprint

Note: * fields are mandatory

FOIA #10-10948-F
Requester - Daniel Zaheer from
law firm Kerr and Wagstaffe

FOIA # 10-10948-F

Requester—Daniel Zaheer from law firm Kerr & Wagstaff

Notes from FOIAXpress Database

FOIA request was granted to the maximum extent possible (hard copy documents were released). However, some electronic records were denied release to the requester under FOIA Exemption # 5.

Put on hold due to fees on 9/23/10 per the request of Vicki. RT

Clarification letter rec'd on 9/30/10 from JC. RT

Sent Response to JC on 9/30/10. RT

Sent clarification of check letter on 10/5/10 and faxed General Counsel and copy of letter as well. RT

Received clarification of check letter from requester on 10/5/10. RT

Letter by mail on 10/15/10. RT

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-10948-F - Request (Granted/Denied In Part)Sign Out 

General Information | **Request Information** | Fee Information | Additional Information

☐ **Modify Description***

1. All contracts with Prudential Insurance Company of America (including its subdivisions, the Office of Servicemember's Group Life Insurance ("OSGLI") and Prudential Alliance Account Services) and the United States government (including the Department of Veterans' Affairs) regarding the Servicemembers' Group Life Insurance ("SGLI"), Family Servicemembers' Group Life Insurance ("FSGLI"), Traumatic Injury Protection Insurance ("TSGLI") and Veterans' Group Life Insurance ("VGLI") programs, from 1995 to the present.

2. On pages 39, 42 and 43 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits

+ Show Description History (1)

Sub Requests*

Default

Other Address

Name	<input type="text"/>	Address1	<input type="text"/>
Organization	<input type="text"/>	Address2	<input type="text"/>
Phone	<input type="text"/>	City	<input type="text"/>
Fax	<input type="text"/>	Country	<input type="text" value="United States"/>
Email	<input type="text"/>	State	<input type="text"/>
		Zip Code	<input type="text"/>

[12345 or 12345-6789 format for US]

Note: * fields are mandatory

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home

10-10948-F - Request (Granted/Denied in Part)

Sign Out

General Information | Request Information | **Fee Information** | Additional Information

Willing Amount \$ 11774.00

Requester Type All Other

☐ Fee Waiver Requested

Fee Waiver Request Reason

Cost Details

Work Hours	\$0.00
Total Extended Cost	\$11774.40
Amount Charged to Requester	\$11774.00
Amount Incurred	\$0.40
Amount Paid	\$11774.00
Balance	\$0.00
Payment Status	Paid

Billing Address

Address1 100 Spear Street, Suite 1800

Address2

City San Francisco

Country United States ▾

State California ▾

Zip Code 94105

[12345 or 12345-6789 format for US]

Current Invoice Details

Invoice Amount \$11774.00

Invoice Number 00000000663

Invoice Date 04/26/2011

Action	Comment	Action Taken By	Action Date/Time
Close Request	Released some records to the requester; denied release of other records to the requester under FOIA Exemption # 5.		04/28/2011 11:47:48 AM
Closed		King, Jeanne	04/28/2011 11:37:19 AM
Final Actions		King, Jeanne	04/28/2011 11:34:42 AM
Invoice	Payment received for the Request '10-10948-F'	King, Jeanne	04/28/2011 11:27:33 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Fee Payment Check' for the request '10-10948-F'	King, Jeanne	04/28/2011 11:27:33 AM
Invoice	Invoice #00000000663 created	King, Jeanne	04/26/2011 11:17:00 AM
Invoice	Cost estimated for the Request '10-10948-F'	King, Jeanne	04/26/2011 11:15:57 AM
Invoice	Cost estimated for the Request '10-10948-F'		04/26/2011 11:15:56 AM
Correspondence	Saved received correspondence letter of type Request with subject 'FinalFOIA Response to Requester' for the request '10-10948-F'	King, Jeanne	04/26/2011 10:45:41 AM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '10-10948-F'	King, Jeanne	04/26/2011 10:44:45 AM
Estimated Delivery Date	Estimated Delivery Date has been changed from '09/24/2010' to '12/16/2010' for the Request '10-10948-F'	King, Jeanne	04/25/2011 03:31:41 PM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied in Part' for the case '10-10948-F'	King, Jeanne	04/25/2011 03:25:28 PM
Final Actions		King, Jeanne	04/25/2011 03:25:28 PM
Start the Clock	Start clock is set on '12/16/2010' with target date '01/18/2011' and received date '12/16/2010'.	King, Jeanne	04/25/2011 03:23:28 PM
Target date changed	Target date has been changed from '09/24/2010' to '01/18/2011' for the Request '10-10948-F' due to start the clock	King, Jeanne	04/25/2011 03:23:28 PM
Perfected		King, Jeanne	04/25/2011 03:23:28 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Letter by mail on 10/15/10' for the request '10-10948-F'		10/15/2010 07:11:36 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Copy of Receipts of Check' for the request '10-10948-F'		10/13/2010 01:44:27 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter from requester on 10/5/10' for the request '10-10948-F'		10/05/2010 03:32:55 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter on 10/5/10' for the request '10-10948-F'		10/05/2010 03:23:08 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Fee letter and checks' for the request '10-10948-F'		10/04/2010 02:27:56 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Response letter to JC on 9/30/10' for the request '10-10948-F'		09/30/2010 03:32:31 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Additional E-mail Traffic 9/30/10' for the request '10-10948-F'		09/30/2010 01:57:37 PM
	Saved received correspondence letter of		09/30/2010 01:19:41

Correspondence	type Request with subject 'E-mail Traffic 9/30/10' for the request '10-10948-F'	PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter' for the request '10-10948-F'	09/30/2010 08:22:53 AM
Correspondence	Saved received correspondence letter of type Request with subject '20M33 Initial Determination Letter 9/27/10' for the request '10-10948-F'	09/27/2010 10:28:07 AM
Assigned		09/23/2010 08:01:35 AM
On Hold-Need Info/Clarification	On hold due to fees.	09/23/2010 07:52:46 AM
Stop the Clock	Stop clock is set on '09/23/2010'.	09/23/2010 07:52:46 AM
On Hold-Need Info/Clarification		09/23/2010 07:52:46 AM
Assigned		09/16/2010 01:10:01 PM
Assigned		09/08/2010 03:09:36 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-10948-F'	08/26/2010 08:34:10 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-10948-F'	08/26/2010 08:30:47 AM
Assigned		08/26/2010 07:27:54 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-10948-F'	08/26/2010 07:22:53 AM
Assigned		08/26/2010 07:22:53 AM
Received		08/26/2010 07:22:53 AM

Report Date: 03/20/2012

Time: 11:53:42 AM

Request Details Report**Request Information:**

Request # : 10-10948-F
Action Office : VBA
Request Type : FOIA
Reference : -
Requested Date : 08/25/2010
Original Received Date : 08/26/2010
Received Date : 12/16/2010
Original Perfected Date : 12/16/2010
Last Perfected Date : 12/16/2010
Disposition Accepted Date : 04/20/2011
Delivery Date : -
Closed Date : 04/20/2011
Original Target Date : 09/24/2010
Target Date : 01/18/2011
Estimated Delivery Date : 12/16/2010
Total Days on Hold : 0
Days Remaining : N/A
Processed Days : 94
Delivery Mode : Mail
Multi-Track Type : Complex
Priority : Normal
Request Status : Closed
Final Disposition : Granted/Denied in Part
Denial Authority : -
Expedite Requested : No
Expedite Status : -
Expedite Description : -
Adjudicate Days (Expedite) : -

Custom Fields:**Responsible Facilities**

Facility : VBA 101 - VA Central Office (VACO)

Description of the Request :

1. All contracts with Prudential Insurance Company of America (including its subdivisions, the Office of Servicemember's Group Life Insurance ("OSGLI") and Prudential Alliance Account Services) and the United States government (including the Department of Veterans' Affairs) regarding the Servicemembers' Group Life Insurance ("SGLI"), Family Servicemembers' Group Life Insurance ("FSGLI"), Traumatic Injury Protection Insurance ("TSGLI") and Veterans' Group Life Insurance ("VGLI") programs, from 1995 to the present. 2. On pages 39, 42 and 43 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the report cites the "OSGLI Monthly Report." Please provide a copy of each such Monthly Report from 1995 to the present. " 3. On page 39 of the

Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the report cites the "OSGLI Monthly Report Statement of Financing and Net Position." Please provide a copy of each such Statement from 1995 to the present. 4. On page 45 of the Veterans Benefits Administration's Fiscal Year 2009 Annual Benefits Report, the Report cites "SGLI/VGLI/TSGLI Monthly Reports." Please provide copies of each such Monthly Report from 1995 to the present.

Sub-requests :

Default

Requester Information:

Requester Name : Zaheer, Daniel
Job Title : -
Created Date : 08/26/2010
Requester Login : -
Requester Type : All Other
Organization : Kerr & Wagstaffe
Work Phone 1 : 415-371-8500
Work Phone 2 : -
Mobile : -
Fax : 415-371-0500
E-Mail : Zaheer@kerrwagstaffe.com

Address:

Address 1 : 100 Spear Street, Suite 1800
Address 2 : -
City : San Francisco
State : California
Country : United States
Zip Code : 94105

Billing Address:

Address 1 : 100 Spear Street, Suite 1800
Address 2 : -
City : San Francisco
State : California
Country : United States
Zip Code : 94105

Shipping Address:

Address 1 : 100 Spear Street, Suite 1800
Address 2 : -
City : San Francisco
State : California
Country : United States
Zip Code : 94105

Other Address:

Name : -

Request Details Report

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Organization : -
 Address 1 : -
 Address 2 : -
 City : -
 State : -
 Country : United States
 Zip Code : -
 Phone : -
 Fax : -
 E-Mail : -

Action History :

Action	Comment	Action Taken By	Action Date/Time
Close Request	Released some records to the requester; denied release of other records to the requester under FOIA Exemption # 5.		04/28/2011 11:47:48 AM
Closed		King, Jeanne	04/28/2011 11:37:19 AM
Final Actions		King, Jeanne	04/28/2011 11:34:42 AM
Invoice	Payment received for the Request '10-10948-F'	King, Jeanne	04/28/2011 11:27:33 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Fee Payment Check' for the request '10-10948-F'	King, Jeanne	04/28/2011 11:27:33 AM
Invoice	Invoice #00000000663 created	King, Jeanne	04/26/2011 11:17:00 AM
Invoice	Cost estimated for the Request '10-10948-F'	King, Jeanne	04/26/2011 11:15:57 AM
Invoice	Cost estimated for the Request '10-10948-F'		04/26/2011 11:15:56 AM
Correspondence	Saved received correspondence letter of type Request with subject 'FinalFOIA Response to Requester' for the request '10-10948-F'	King, Jeanne	04/26/2011 10:45:41 AM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Information for Requester' for the request '10-10948-F'	King, Jeanne	04/26/2011 10:44:45 AM
Estimated Delivery Date	Estimated Delivery Date has been changed from '09/24/2010' to '12/16/2010' for the Request '10-10948-F'.	King, Jeanne	04/25/2011 03:31:41 PM
Final Disposition	Reportable Disposition has been set to 'Granted/Denied In Part' for the case '10-10948-F'	King, Jeanne	04/25/2011 03:25:28 PM
Final Actions		King, Jeanne	04/25/2011 03:25:28 PM
Start the Clock	Start clock is set on '12/16/2010' with target date '01/18/2011' and received date '12/16/2010'.	King, Jeanne	04/25/2011 03:23:28 PM
Target date changed	Target date has been changed from '09/24/2010' to '01/18/2011' for the Request '10-10948-F' due to start the clock	King, Jeanne	04/25/2011 03:23:28 PM
Perfected		King, Jeanne	04/25/2011

		03:23:28 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Letter by mail on 10/15/10' for the request '10-10948-F'	10/15/2010 07:11:36 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Copy of Receipts of Check' for the request '10-10948-F'	10/13/2010 01:44:27 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter from requester on 10/5/10' for the request '10-10948-F'	10/05/2010 03:32:55 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification of check letter on 10/5/10' for the request '10-10948-F'	10/05/2010 03:23:08 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Fee letter and checks' for the request '10-10948-F'	10/04/2010 02:27:56 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Response letter to JC on 9/30/10' for the request '10-10948-F'	09/30/2010 03:32:31 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Additional E-mail Traffic 9/30/10' for the request '10-10948-F'	09/30/2010 01:57:37 PM
Correspondence	Saved received correspondence letter of type Request with subject 'E-mail Traffic 9/30/10' for the request '10-10948-F'	09/30/2010 01:19:41 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter' for the request '10-10948-F'	09/30/2010 08:22:53 AM
Correspondence	Saved received correspondence letter of type Request with subject '20M33 Initial Determination Letter 9/27/10' for the request '10-10948-F'	09/27/2010 10:28:07 AM
Assigned		09/23/2010 08:01:35 AM
On Hold-Need Info/Clarification	On hold due to fees.	09/23/2010 07:52:46 AM
Stop the Clock	Stop clock is set on '09/23/2010'.	09/23/2010 07:52:46 AM
On Hold-Need Info/Clarification		09/23/2010 07:52:46 AM
Assigned		09/16/2010 01:10:01 PM
Assigned		09/08/2010 03:09:36 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-10948-F'	08/26/2010 08:34:10 AM
Correspondence	Saved received correspondence letter of type Request with subject	08/26/2010

	'Request Description' for the request '10-10948-F'	08:30:47 AM
Assigned		08/26/2010 07:27:54 AM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-10948-F'	08/26/2010 07:22:53 AM
Assigned		08/26/2010 07:22:53 AM
Received		08/26/2010 07:22:53 AM

Assign:

Assigned By		
Assigned Date	: 09/23/2010	
Assigned To	: User/Group	Action Office
	King, Jeanne (Primary)	VBA
	FX Admin	OI&T
		VBA

Comments : -

Perfect:

Perfected By : King, Jeanne
 Original Perfected Date : 12/16/2010
 Last Perfected By : King, Jeanne
 Last Perfected Date : 12/16/2010
 Comments : -

Link Cases :

Request #	Request Type	Requester Name	Primary User	Received Date	Target Date	Request Status
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No link cases found

FOIA Documents Details (in Case Folder):

File Cabinet Drawer	Folder Name	Disposition	Layer Name	No. of Pages	Date Added	Redaction Codes	Document Review Status
------------------------	-------------	-------------	------------	--------------	------------	--------------------	------------------------------

No folders have been added to this case.

FOIA Documents Details (in Review Log):

File Cabinet Drawer	Folder Name	Disposition	Comments	No. of Pages	Date Added	Redaction Codes
------------------------	-------------	-------------	----------	-----------------	---------------	--------------------

No folders have been added to this case.

Page Details:

# of pages attached to case folder	: 0
# of pages attached to case folder with partial redactions	: 0
# of pages attached to case folder with full redactions	: 0

of pages attached to case folder without redactions : 0
 # of documents delivered : 0

	Generated Count	Adjusted Count
# of pages reviewed	0	0
# of pages delivered	0	0

Partially Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with partial redactions was added to this case.	

Fully Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with full redactions was added to this case	

Manually - Partially Applied Redaction Code Details:

Redaction Code	Description
(b)(5)	Permits withholding information under the deliberative process privilege, including the pre-decisional documents, or information that could be withheld under civil discovery, attorney-client, or attorney-work product privileges.

Manually - Fully Applied Redaction Code Details:

Redaction Code	Description
	No fully applied redaction code details found

Manually Applied - Other Redaction Code Details:

Redaction Code	Description
	No other applied redaction code details found

Fee Details :

Payment Status : Paid
 Invoice Amount : \$ 11,774.00
 Invoice Number : 00000000663
 Invoice Date : 04/26/2011
 Cost Estimated : \$ 11,774.40
 Cost Not Charged by the Agency : \$ 0.40
 Total Amount Paid : \$ 11,774.00
 Balance Amount : \$ 0.00
 Amount Requester Willing to Pay : \$ 11,774.00
 Fee Waiver Requested : No
 Fee Waiver Status : -
 Adjudicate Days (Fee Waiver) : -

Fee Details Description:

Fee Items	Charge Type	Unit Rate (\$)	Quantity	Extended Value (\$)
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Page 7 of 7

Work Hours :

Transfer Details:

Correspondence Log :

Consultation Review Log :


Requests For Documents:

<https://ains.foia-host.com/foiaxpress/Reports/afxDetailsReport.aspx?RequestID=27059...> 03/20/2012

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home			
10-11909-F - Request (Granted in full)			Sign Out
General Information		Request Information	Fee Information
Action Office* VEA Request Type* FOIA Requester* Evans, David Organization Bloomberg Markets Magazine Received Mode Fax Delivery Mode Mail Method of Payment Requested Date* 05/27/2010 <input type="checkbox"/> Original Received Date 05/27/2010 <input type="checkbox"/> Received Date* 08/06/2010 Original Target Date 06/25/2010 Target Date 12/23/2010 <input type="checkbox"/> Estimated Delivery Date 06/25/2010 <input type="checkbox"/> Original Perfect Date 05/27/2010 <input type="checkbox"/> Last Perfected Date 08/06/2010 <input type="checkbox"/> Closed Date 09/02/2010		Status Closed - Granted in full Primary User King, Jeanne Review Status 13. Disposition letter sent.. Priority Normal Multi-Track Type Complex Shipping Address Address1 6500 Wilshire Boulevard Address2 Suite 2360 City Los Angeles Country United States State California Zip Code 90048 [12345 or 12345-6789 format for US]	
<input type="checkbox"/> Expedite Requested Expedite reason		Link Requests Link Requests	
Notes		Notes	

Note: * fields are mandatory

FOIA Request
 Bloomberg News / David Evans
 #10-11909-F

[New](#) ▾ [Save](#) [Delete](#) [Actions](#) ▾ [Correspondence](#) ▾ [Alerts](#) [Notes](#) ▾ [Details](#) ▾ [Barcode](#) [Appeals](#) [Spell Check](#) [Home](#)**10-11909-F - Request (Granted in full)**[Sign Out](#) [General Information](#) | [Request Information](#) | [Fee Information](#) | [Additional Information](#)☐ **Modify Description***


Requester asked for copies of contracts and correspondence relating to the Alliance Accounts feature of the Servicemembers' Group Life Insurance (SGLI) and Veterans' Group Life Insurance (VGLI) programs.

[+ Show Description History \(1\)](#)**Sub Requests***[Default](#)**Other Address**

Name	<input type="text"/>	Address1	<input type="text"/>
Organization	<input type="text"/>	Address2	<input type="text"/>
Phone	<input type="text"/>	City	<input type="text"/>
Fax	<input type="text"/>	Country	<input type="text" value="United States"/>
Email	<input type="text"/>	State	<input type="text"/>
		Zip Code	<input type="text"/>

[12345 or 12345-6789 format for US]

Note: * fields are mandatory

New ▾ Save Delete Actions ▾ Correspondence ▾ Alerts Notes ▾ Details ▾ Barcode Appeals Spell Check Home															
10-11909-F - Request (Granted in full) Sign Out 															
General Information Request Information Fee Information Additional Information															
<div>Willing Amount \$ <input type="text" value="0.00"/></div> <div>Requester Type <input type="text" value="News Media"/></div> <div><input checked="" type="checkbox"/> Fee Waiver Requested</div> <div>Fee Waiver <input type="text" value=""/></div> <div>Fee Waiver Status <input type="text" value="Granted"/></div> <div>Start date* <input type="text" value="05/27/2010"/></div> <div>End date* <input type="text" value="08/13/2010"/></div> <div>Fee Waiver Request Reason <div><div></div></div></div>	<div>Billing Address</div> <div>Address1 <input type="text" value="6500 Wilshire Boulevard"/></div> <div>Address2 <input type="text" value="Suite 2360"/></div> <div>City <input type="text" value="Los Angeles"/></div> <div>Country <input type="text" value="United States"/></div> <div>State <input type="text" value="California"/></div> <div>Zip Code <input type="text" value="90048"/></div> <div>[12345 or 12345-6789 format for US]</div> <div>Current Invoice Details</div> <div>Invoice Amount <input type="text" value="\$0.00"/></div> <div>Invoice Number <input type="text" value="-"/></div> <div>Invoice Date <input type="text" value="-"/></div>														
<div>Cost Details</div> <table><tr><td>Work Hours</td><td>\$0.00</td></tr><tr><td>Total Extended Cost</td><td>\$0.00</td></tr><tr><td>Amount Charged to Requester</td><td>\$0.00</td></tr><tr><td>Amount Incurred</td><td>\$0.00</td></tr><tr><td>Amount Paid</td><td>\$0.00</td></tr><tr><td>Balance</td><td>\$0.00</td></tr><tr><td>Payment Status</td><td>No Charges</td></tr></table>	Work Hours	\$0.00	Total Extended Cost	\$0.00	Amount Charged to Requester	\$0.00	Amount Incurred	\$0.00	Amount Paid	\$0.00	Balance	\$0.00	Payment Status	No Charges	
Work Hours	\$0.00														
Total Extended Cost	\$0.00														
Amount Charged to Requester	\$0.00														
Amount Incurred	\$0.00														
Amount Paid	\$0.00														
Balance	\$0.00														
Payment Status	No Charges														

Action	Comment	Action Taken By	Action Date/Time
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Email of September 2, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 04:37:12 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Response Letter of August 20, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 04:32:04 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter of August 13, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 03:56:23 PM
Close Request	Requester was forwarded all information relevant to his request regarding the Alliance Accounts feature of the SGLI/VGLI programs.	King, Jeanne	09/14/2010 03:48:41 PM
Closed		King, Jeanne	09/14/2010 03:48:41 PM
Assigned			09/14/2010 03:46:51 PM
Final Disposition	Reportable Disposition has been set to 'Granted in full' for the case '10-11909-F'	King, Jeanne	09/14/2010 03:46:40 PM
Final Actions		King, Jeanne	09/14/2010 03:46:40 PM
Start the Clock	Start clock is set on '08/06/2010' with target date '12/23/2010'.		09/14/2010 03:40:36 PM
Target date changed	Target date has been changed from '10/13/2010' to '12/23/2010' for the Request '10-11909-F' due to start the clock		09/14/2010 03:40:36 PM
Stop the Clock	Stop clock is set on '05/27/2010'.		09/14/2010 03:40:23 PM
Start the Clock	Start clock is set on '09/14/2010' with target date '10/13/2010'.		09/14/2010 03:40:04 PM
Target date changed	Target date has been changed from '06/25/2010' to '10/13/2010' for the Request '10-11909-F' due to start the clock		09/14/2010 03:40:04 PM
Perfected			09/14/2010 03:40:04 PM
Assigned			09/14/2010 03:39:01 PM
Stop the Clock	Stop clock is set on '09/14/2010'.	King, Jeanne	09/14/2010 03:35:30 PM
On Hold-Need Info/Clarification		King, Jeanne	09/14/2010 03:35:30 PM
Assigned		King, Jeanne	09/14/2010 03:34:19 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-11909-F'	King, Jeanne	09/14/2010 03:28:46 PM
Assigned		King, Jeanne	09/14/2010 03:28:45 PM
Received		King, Jeanne	09/14/2010 03:28:45 PM
On Hold-Other			05/27/2010 12:00:00 AM

Report Date: 03/20/2012

Time: 11:38:08 AM

Request Details Report**Request Information:**

Request # : 10-11909-F
Action Office : VBA
Request Type : FOIA
Reference : -
Requested Date : 05/27/2010
Original Received Date : 05/27/2010
Received Date : 08/06/2010
Original Perfected Date : 05/27/2010
Last Perfected Date : 08/06/2010
Disposition Accepted Date : 08/20/2010
Delivery Date : -
Closed Date : 09/02/2010
Original Target Date : 06/25/2010
Target Date : 12/23/2010
Estimated Delivery Date : 06/25/2010
Total Days on Hold : 0
Days Remaining : N/A
Processed Days : 19
Delivery Mode : Mail
Multi-Track Type : Complex
Priority : Normal
Request Status : Closed
Final Disposition : Granted in full
Denial Authority : -
Expedite Requested : No
Expedite Status : -
Expedite Description : -
Adjudicate Days (Expedite) : -

Custom Fields:

Responsible Facilities	
Facility	: VBA 310 - Philadelphia Regional Office

Description of the Request :

Requester asked for copies of contracts and correspondence relating to the Alliance Accounts feature of the Servicemembers' Group Life Insurance (SGLI) and Veterans' Group Life Insurance (VGLI) programs.

Sub-requests :

Default

Requester Information:

Requester Name : Evans, David
Job Title : Journalist
Created Date : 09/14/2010
Requester Login : -
Requester Type : News Media
Organization : Bloomberg Markets Magazine
Work Phone 1 : 323-782-4241
Work Phone 2 : -
Mobile : 310-990-2348
Fax : 323-966-5969
E-Mail : davidevans@bloomberg.net

Address:

Address 1 : 6500 Wilshire Boulevard
Address 2 : Suite 2360
City : Los Angeles
State : California
Country : United States
Zip Code : 90048

Billing Address:

Address 1 : 6500 Wilshire Boulevard
Address 2 : Suite 2360
City : Los Angeles
State : California
Country : United States
Zip Code : 90048

Shipping Address:

Address 1 : 6500 Wilshire Boulevard
Address 2 : Suite 2360
City : Los Angeles
State : California
Country : United States
Zip Code : 90048

Other Address:

Name : -
Organization : -
Address 1 : -
Address 2 : -
City : -
State : -
Country : United States
Zip Code : -
Phone : -
Fax : -

E-Mail : -

Action History :

Action	Comment	Action Taken By	Action Date/Time
Correspondence	Saved received correspondence letter of type Request with subject 'Final FOIA Email of September 2, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 04:37:12 PM
Correspondence	Saved received correspondence letter of type Request with subject 'FOIA Response Letter of August 20, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 04:32:04 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Clarification Letter of August 13, 2010' for the request '10-11909-F'	King, Jeanne	09/14/2010 03:56:23 PM
Close Request	Requester was forwarded all information relevant to his request regarding the Alliance Accounts feature of the SGLI/VGLI programs.	King, Jeanne	09/14/2010 03:48:41 PM
Closed		King, Jeanne	09/14/2010 03:48:41 PM
Assigned			09/14/2010 03:46:51 PM
Final Disposition	Reportable Disposition has been set to 'Granted in full' for the case '10-11909-F'	King, Jeanne	09/14/2010 03:46:40 PM
Final Actions		King, Jeanne	09/14/2010 03:46:40 PM
Start the Clock	Start clock is set on '08/06/2010' with target date '12/23/2010'.		09/14/2010 03:40:36 PM
Target date changed	Target date has been changed from '10/13/2010' to '12/23/2010' for the Request '10-11909-F' due to start the clock		09/14/2010 03:40:36 PM
Stop the Clock	Stop clock is set on '05/27/2010'.		09/14/2010 03:40:23 PM
Start the Clock	Start clock is set on '09/14/2010' with target date '10/13/2010'.		09/14/2010 03:40:04 PM
Target date changed	Target date has been changed from '06/25/2010' to '10/13/2010' for the Request '10-11909-F' due to start the clock		09/14/2010 03:40:04 PM
Perfected			09/14/2010 03:40:04 PM
Assigned			09/14/2010 03:39:01 PM
Stop the Clock	Stop clock is set on '09/14/2010'.	King, Jeanne	09/14/2010 03:35:30 PM
On Hold-Need Info/Clarification		King, Jeanne	09/14/2010 03:35:30 PM
Assigned		King, Jeanne	09/14/2010 03:34:19 PM
Correspondence	Saved received correspondence letter of type Request with subject 'Request Description' for the request '10-11909-F'	King, Jeanne	09/14/2010 03:28:46 PM
Assigned		King, Jeanne	09/14/2010 03:28:45 PM
			09/14/2010

Request Details Report

Page 4 of 6

Received

King, Jeanne

03:28:45 PM

On Hold-Other

05/27/2010

12:00:00 AM

Assign:

Assigned By

Assigned Date

: 09/14/2010

Assigned To

: User/Group

King, Jeanne (Primary)

FX Admin

Action Office

VBA

OI&T

Comments

: -

Perfect:

Perfected By

:

Original Perfected Date

: 05/27/2010

Last Perfected By

:

Last Perfected Date

: 08/06/2010

Comments

: -

Link Cases :

Request #	Request Type	Requester Name	Primary User	Received Date	Target Date	Request Status
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No link cases found

FOIA Documents Details (in Case Folder):

File Cabinet Drawer	Folder Name	Disposition	Layer Name	No. of Pages	Date Added	Redaction Codes	Document Review Status
---------------------	-------------	-------------	------------	--------------	------------	-----------------	------------------------

No folders have been added to this case.

FOIA Documents Details (in Review Log):

File Cabinet Drawer	Folder Name	Disposition	Comments	No. of Pages	Date Added	Redaction Codes
---------------------	-------------	-------------	----------	--------------	------------	-----------------

No folders have been added to this case.

Page Details:

# of pages attached to case folder	: 0
# of pages attached to case folder with partial redactions	: 0
# of pages attached to case folder with full redactions	: 0
# of pages attached to case folder without redactions	: 0
# of documents delivered	: 0

	Generated Count	Adjusted Count
# of pages reviewed	0	0
# of pages delivered	0	0

Partially Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
----------------	-------------	-------------------

No Page with partial redactions was added to this case.

Fully Applied Redaction Code Details:

Redaction Code	Description	No. of Pages Used
	No Page with full redactions was added to this case	

Manually - Partially Applied Redaction Code Details:

Redaction Code	Description
	No partially applied redaction code details found

Manually - Fully Applied Redaction Code Details:

Redaction Code	Description
	No fully applied redaction code details found

Manually Applied - Other Redaction Code Details:

Redaction Code	Description
	No other applied redaction code details found

Fee Details :

Payment Status	: No Charges
Invoice Amount	: \$ 0.00
Invoice Number	: -
Invoice Date	: -
Cost Estimated	: \$ 0.00
Cost Not Charged by the Agency	: \$ 0.00
Total Amount Paid	: \$ 0.00
Balance Amount	: \$ 0.00
Amount Requester Willing to Pay	: \$ 0.00
Fee Waiver Requested	: Yes
Fee Waiver Status	: Granted
Adjudicate Days (Fee Waiver)	: 5

Fee Details Description:

Fee Items	Charge Type	Unit Rate (\$)	Quantity	Extended Value (\$)
No Fee Details have been Found for this Request.				

Work Hours :

Program Office	Created By	Rate	Hours	Total Cost	Comments
No Work Hours details found.					

Transfer Details:

Transfer To	Transfer By	Transfer Date	Comment
-------------	-------------	---------------	---------

Correspondence Log :

Date	Letter Description	User	Status	Mode	eSigned?	E-mail
09/14/2010	Request Description	King, Jeanne	Received	Fax	No	
09/14/2010	Clarification Letter of August 13, 2010	King, Jeanne	Received	Other	No	
09/14/2010	FOIA Response Letter of August 20, 2010	King, Jeanne	Received	Other	No	
09/14/2010	Final FOIA Email of September 2, 2010	King, Jeanne	Received	Other	No	

Consultation Review Log :

Review ID	Location(s) Referred	Due Date	Created Date	Imported Date	Disposition	Accepted Date	Status
No consultation review log records found							

Requests For Documents:

ID	Location(s) Referred	Request Date	Due Date	Status
No Request For Documents log details found				



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

August 13, 2010

Mr. David Evans
Bloomberg Markets Magazine
6500 Wilshire Boulevard
Suite 2360
Los Angeles, CA 90048

In Reply Refer To:
310/290B

Dear Mr. Evans:

I am writing to you in response to your Freedom of Information Act (FOIA) request, dated May 27, 2010, which is attached, in which you asked for information regarding the Servicemembers' Group Life (SGLI) and Veterans' Group Life Insurance (VGLI) programs.

This letter acknowledges your request, and also confirms that you will receive an expedited response from our office. All applicable fees will be waived.

The information that you have requested regarding the SGLI and VGLI programs will be forwarded to you via regular mail delivery within ten (10) business days.

I do ask that all future requests made under the FOIA be submitted in writing.

If you have any questions about this letter, please contact me at 215-842-2000, ext. 4839.

Sincerely,

JEANNE KING
Privacy/FOIA Officer
VA Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

October 8, 2010

Mr. Daniel Zaheer
Kerr & Wagstaffe, LLP
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B

Dear Mr. Zaheer:

This will acknowledge receipt of your Freedom of Information Act (FOIA) request, dated August 25, 2010, and received on August 26, 2010 by the Department of Veterans Affairs, Veterans Benefits Administration (VBA). The same FOIA request was mistakenly addressed to Ms. Janet Hardt at the Philadelphia, PA Regional Office and Insurance Center (ROIC). Ms. Hardt is the Privacy Officer for the Regional Office only; any VA Insurance-related FOIA requests should be directed to my attention.

The Insurance Service is the custodian of the majority of records for the potential pool of documents responsive to your request. The requests numbered "37", "39" and "42" have been referred to VBA's Central Office.

Search Cut-Off date

This office has reviewed your FOIA request. The search cut-off date for responsive records to your FOIA request is August 26, 2010. Records that VA may have created or gathered on this subject after this cut-off date are not considered being within the scope of your FOIA request.

Initial Notice of Determination

VBA has assigned the individualized **tracking number 10-10948-F** to this request. The OPEN Government Act of 2007 amended the time period provisions in "unusual circumstances." There is a need to search for, collect, and examine a voluminous amount of records "demanded in a single request." The records will be examined to determine if VA must engage in the predisclosure notification process for records that contain trade secrets or confidential commercial or financial information consistent with Executive Order 12600 and VA's implementing regulation 38 CFR 1.554a.

Fees

The FOIA, 5 U.S.C. §552(a)(4)(A)(ii)(I)(III) (2006) as amended, and the VA's implementing regulations concerning FOIA fees are found at 38 C.F.R. § 1.555. These provide for fees that may be assessed in response to FOIA requests. Your letter states that you "...agree to pay reasonable **duplication fees** for the processing of this request up to a maximum of \$1,000."

2.

The FOIA requires that requesters follow the agency's published rules for processing FOIA requests, including those pertaining to the payment of authorized fees.

It is my determination that you are a commercial use requester. Accordingly, the direct costs of searching, reviewing, and duplicating the records sought will be charged to the requester. The commercial use requester will be charged the cost of searching for and reviewing records even if there is ultimately no disclosure of the records.

We are required by 38 CFR 1.555(b)(2) to notify a FOIA requester if the fees are likely to be higher than their indicated willingness to pay. This is notice that you may confer with Department personnel with the object of reformulating the request to meet your needs at a lower cost. You may contact Insurance Service Deputy Assistant Director Stephen Wurtz at phone # 215-381-3029 if you wish to pursue this option.

Please be advised that the actual FOIA fees could exceed or fall below the estimated amount upon final tabulation. An appropriate adjustment will be made for any difference upon completion of processing your request.

The Insurance Service is currently assembling a cost estimate of the fees that will be charged to process your request. You will shortly be notified of the fee estimate. The preparation necessary to assemble the fee estimate has entailed more time than anticipated; we apologize for the delay.

Point of Contact

Any questions pertaining to this response should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
VA Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

October 19, 2010

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe, LLP
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B

Dear Mr. Von Loewenfeldt:

This will acknowledge receipt of your Freedom of Information Act (FOIA) request, dated September 2, 2010, and received on September 8, 2010 by the Department of Veterans Affairs, Veterans Benefits Administration (VBA). The same FOIA request was mistakenly addressed to Ms. Janet Hardt at the Philadelphia, PA Regional Office and Insurance Center (ROIC). Ms. Hardt is the Privacy Officer for the Regional Office only; any VA Insurance-related FOIA requests should be directed to my attention.

The Insurance Service is the custodian of the majority of records for the potential pool of documents responsive to your request. The requests numbered "11", "12" and "13" have been referred to VBA's Central Office.

Search Cut-Off date

This office has reviewed your FOIA request. The search cut-off date for responsive records to your FOIA request is September 2, 2010. Records that VA may have created or gathered on this subject after this cut-off date are not considered being within the scope of your FOIA request.

Initial Notice of Determination

VBA has assigned the individualized **tracking number 10-11722-F** to this request. The OPEN Government Act of 2007 amended the time period provisions in "unusual circumstances." There is a need to search for, collect, and examine a voluminous amount of records "demanded in a single request." The records will be examined to determine if VA must engage in the predisclosure notification process for records that contain trade secrets or confidential commercial or financial information consistent with Executive Order 12600 and VA's implementing regulation 38 CFR 1.554a.

Fees

The FOIA, 5 U.S.C. §552(a)(4)(A)(ii)(I)(III) (2006) as amended, and the VA's implementing regulations concerning FOIA fees are found at 38 C.F.R. § 1.555. These provide for fees that may be assessed in response to FOIA requests. Your letter states that you "...agree to pay reasonable **duplication fees** for the processing of this request up to a maximum of \$1,000."

2.

The FOIA requires that requesters follow the agency's published rules for processing FOIA requests, including those pertaining to the payment of authorized fees.

It is my determination that you are a commercial use requester. Accordingly, the direct costs of searching, reviewing, and duplicating the records sought will be charged to the requester. The commercial use requester will be charged the cost of searching for and reviewing records even if there is ultimately no disclosure of the records.

We are required by 38 CFR 1.555(b)(2) to notify a FOIA requester if the fees are likely to be higher than their indicated willingness to pay. This is notice that you may confer with Department personnel with the object of reformulating the request to meet your needs at a lower cost. You may contact Insurance Service Deputy Assistant Director Stephen Wurtz at phone # 215-381-3029 if you wish to pursue this option.

Please be advised that the actual FOIA fees could exceed or fall below the estimated amount upon final tabulation. An appropriate adjustment will be made for any difference upon completion of processing your request.

The Insurance Service is currently assembling a cost estimate of the fees that will be charged to process your request. You will shortly be notified of the fee estimate. The preparation necessary to assemble the fee estimate has entailed more time than anticipated; we apologize for the delay.

Point of Contact

Any questions pertaining to this response should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
VA Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

November 22, 2010

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe, LLP
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B

Dear Mr. Von Loewenfeldt:

This correspondence is in response to our telephone conversation of October 20, 2010, regarding the Freedom of Information Act (FOIA) requests that you and Mr. Daniel Zaheer have forwarded to our office. This letter is designed to confirm the overall disposition of the two FOIA requests, as discussed by you and Stephen Wurtz, Deputy Assistant Director of the VA Insurance Service.

With regard to the FOIA request, dated September 2, 2010, that you forwarded to our office (tracking # 10-11722-F), we believe that we have reached agreement on how to respond to the questions in your request (referenced by number) as follows:

1—You stated that information dating from 1998 to the present would suffice for questions # 1, 2, and 3. The information requested for 1a, 1c, and 1d will be provided at no expense to you, and can be located in the report titled "X". The information requested for 1b is enclosed at no expense to you, and can be located in the document titled "X".

#2—The information requested in 2a, 2c, and 2d is not available. The information requested in 2b is enclosed at no expense to you, and can be located in the report titled "X".

#3—The information requested for 3a, 3c, and 3d is enclosed at no expense to you, and can be located in the report titled "X". The information requested for 3b is enclosed at no expense to you, and can be located in the document entitled "X".

#4—We interpreted (and you concurred) that this question pertained to the reimbursement paid by VA for administrative expenses incurred by Prudential Insurance Company of America (hereafter referred to as "Prudential") in their operation of the Servicemembers' and Veterans' Group Life Insurance (SGLI/VGLI) programs. The requested information is enclosed at no expense to you, and can be located in the documents from 1995 to present entitled "SGLI Annual Report".

#5, 6, 7, 8—We have no records responsive to your requests for these numbered items, with one exception, correspondence forwarded from our office in response to a veteran's inquiry regarding the operation of the Alliance Accounts. We have enclosed a copy of this correspondence—with accompanying redaction of the veteran's personally identifiable information—at no expense to you.

2.

#9—We have enclosed copies of the following documents that evidence Director Thomas Lastowka's 1999 approval of the Alliance Account (referenced in his August 6, 2010 letter to VA beneficiaries) at no expense to you: a copy of the minutes from the 1998 and 1999 meetings of the SGLI Advisory Council; excerpts from a copy of the FY 2000 and FY 2001 Department of Veterans Affairs Budget Submission; a slide deck presentation given at the December 17, 1998 SGLI Advisory Council meeting; a copy of Director Thomas Lastowka's September 25, 2003 testimony before the House Committee on Veterans' Affairs, Subcommittee on Benefits (this document is also available on the VA web site).

#10—We have interpreted this question when referring to the Department of Veterans Affairs and/or the Veterans Benefits Administration to be applicable only to the VA Insurance Service. In response to this question, we have enclosed the following documents at no expense to you: a series of emails that discuss the Alliance Accounts in the applicable time period of 1998-1999; a sample copy of the documents related to the Alliance Account that were provided by Prudential to the first beneficiaries to receive payment via the Alliance Account in 1999 (informally known as the Alliance Account "kit").

#11, 12, 13—We have referred these questions to VA Central Office for a response.

#14—The fee estimate to provide a response to this question is \$ ____.

#15—The fee estimate to provide a response to this question is \$ ____.

#16—Based on our conversation of October 20, 2010, we have interpreted this question to be applicable to emails to or from the prudential.com domain that only reference the Alliance Account. The fee estimate to provide a response to this question is \$ ____.

#17, 18—Based on our conversation of October 20, 2010, you have agreed to withdraw these two questions from your FOIA request.

#19—We have no records that are responsive to this request.

#20—We have no records that are responsive to this request.

With regard to the FOIA request, dated August 25, 2010, that Mr. Daniel Zaheer forwarded to our office (tracking # 10-10948-F), we believe that we have reached agreement on how to respond to the questions in his request (referenced by number) as follows:

#1—Based on our conversation of October 20, 2010, you have agreed to withdraw this question from Mr. Daniel Zaheer's FOIA request.

#2, 3, 4, 5—We have enclosed the requested information at no expense to you. All of the requested information can be obtained from the VA Monthly Report, with the exception of information related to the TSGLI program, as well as with the exception of information related to

3.

the request for "OSGLI Monthly Report Statement of Financing and Net Position"; the latter request does not pertain to the SGLI or VGLI programs.

#6—We have interpreted the term "report" to refer to documents that include specific data elements regarding the SGLI or VGLI programs. In response to this question, we have enclosed the following documents from the time period 1995 to present at no expense to you: the "Statement of Annual Accounting" from the SGLI Annual Report(?), and ????

#7—We have interpreted the phrase "reports prepared by the Department of Veterans Affairs" to refer to reports prepared by the VA Insurance Service. We have interpreted the term "report" to refer to documents that include specific data elements regarding the Alliance Accounts. In response to this question, we have enclosed the following documents from the time period 1995 to present at no expense to you: ??? (not certain of the name of the reports that we will be providing here, other than the TSGLI Report, and maybe some reports from Actuarial Staff).

#8—We have enclosed copies of the Veterans Benefits Administration Annual Benefits Reports for FY 1995, 1996, 1997, and 1998. (Kristan is checking with Daryl Mecklem to see if the reports even exist for all of the years referenced by the requester).

#9—We have previously enclosed this information in our response to question # 4 from the FOIA request dated September 2, 2010, from Mr. Michael Von Loewenfeldt.

#10, 11, 12, 13—We have no records responsive to these requests. The information should be requested from Prudential Insurance Company of America.

#14—We are able to provide a copy of each version of the Servicemembers' and Veterans' Group Life Insurance Handbook from year 2000 to the present; the duplication copy fee estimate is \$???. We are also able to provide a copy of each version of the handbook for years 1995-1999; the duplication copy fee estimate is \$??. The fee estimate is greater for years 1995-1999 due to the necessity to duplicate the requested documents from booklets that exist only in print version.

#15— We are able to provide a copy of each version of the VA Life Insurance Programs for Veterans and Servicemembers Handbook from year 2000 to the present; the duplication copy fee estimate is \$???. We are also able to provide a copy of each version of the handbook for years 1995-1999; the duplication copy fee estimate is \$??. The fee estimate is greater for years 1995-1999 due to the necessity to duplicate the requested documents from booklets that exist only in print version.

#16—We have previously enclosed this information in our response to question # ?? from the FOIA request dated September 2, 2010, from Mr. Michael Von Loewenfeldt.

#17, 18—We have no records responsive to these requests.

4.

#19—We have previously enclosed this information in our response to question #??? from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt.

#20, 21, 22, 23, 24—We have no records responsive to these requests.

#25—We have previously enclosed this information in our response to question # 4 from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt.

#26—We have previously enclosed this information in our response to question # 4 from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt (can be located in the “Statement of Annual Accounting” in the SGLI Annual Report).

#27—We have no records responsive to this request.

28—We have previously enclosed this information in our response to question # 10 from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt (the 1999 Alliance Account “kit” stated that the guaranteed rate of interest paid in 1999 to Alliance Account beneficiaries was 2 per cent).

#29—We have no records responsive to this request.

#30—We have no records responsive to this request.

#31—Based on our conversation of October 20, 2010, you have agreed to withdraw this question from Mr. Daniel Zaheer’s FOIA request.

#32—We have previously enclosed this information in our response to question # 9 from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt.

#33—The fee estimate to provide a response to this question is \$. ____.

#34—We have previously enclosed this information in our response to question # 9 from the FOIA request dated September 2, 2010 from Mr. Michael Von Loewenfeldt.

#35—The fee estimate to provide a response to this question is \$ ____ , not including duplication costs (note: Steve’s estimate must be added here as well).

#36—The fee estimate to provide a response to this question is \$ ____ (this number should match the number we provided in our response to # 35).

#37—We referred this request in our first letter to him to VACO; at our last meeting, Steve stated that he would tackle this question. Monica reminded us that it may well fall within the FOIA Exemption #5, the exemption that protects the deliberative pre-decisional process for internal agency documents.

5.

#38—At our last meeting, Steve that he would tackle this question. Monica reminded us that it may well fall within the FOIA Exemption # 5, the exemption that protects the deliberative pre-decisional process for internal agency documents.

#39—We referred this request in our first letter to him to VACO; still an open question as to whether we need to partially respond to this request with copies of our own documents that may be applicable to this question, if yes, than a fee estimate would be needed for this question.

#40—Based on our conversation of October 20, 2010, you have agreed to withdraw this question from Mr. Daniel Zaheer's FOIA request.

#41—The fee estimate to provide a response to this question is \$_____.

#42—This request has been referred for a response to VA Central Office.

#43—We have previously enclosed this information in our response to question #5 from the FOIA request, dated September 2, 2010, from Michael Von Loewenfeldt.

#44—We have no records responsive to this request.

#45—We have no records responsive to this request.

#46—We have no records responsive to this request.

#47—We have no records responsive to this request. The FOIA request that your office has forwarded to VA's Office of Inspector General should enable you to obtain the information requested in this question.

#48—At our last meeting, Steve agreed to tackle this question. (We are not likely to have too many, if any, records that are responsive to this request, as the implicit assumption in most of our correspondence is that the Alliance Account form of payment does constitute a lump sum payment).

#49—Based on our conversation of October 20, 2010, you have agreed to withdraw this question from Mr. Daniel Zaheer's FOIA request.

#50—We have enclosed the requested information at no expense to you. (Ruth—do the certificate copies that we have located encompass the time period from 1995 to present?).

#51—We have no records responsive to this request.

#52—We have no records responsive to this request.

#53—We have no records responsive to this request.

6.

#54—We have no records responsive to this request.

#55—We have no records responsive to this request.

Fees

The FOIA, 5 U.S.C. §552(a)(4)(A)(ii)(I)(III) (2006) as amended, and the VA's implementing regulations concerning FOIA fees are found at 38 C.F.R. §1.555. These provide for fees that may be assessed in response to FOIA requests. Your letter states that you "...agree to pay reasonable **duplication fees** for the processing of this request up to a maximum of \$1,000."

I have determined that you are a commercial use requester (38 CFR § 1.555(d)(1)). In your initial letter, you agreed to pay \$1,000 for duplication costs. Since you are a commercial use requester, you are required to pay search, review and duplication costs. I cannot assume that your agreement to pay duplication costs also includes satisfactory assurance to pay search and review costs for the associated documents. Please confirm that you will pay all of these costs (38 CFR § 1.555(g)(4)). Note that my estimated costs enclosed herein include search, review, and duplication costs for the requested documents.

Please confirm if you concur with the consolidation of the two FOIA requests submitted by yourself and Mr. Daniel Zaheer. Any such confirmation must include an acknowledgment that is also signed and dated by Mr. Zaheer.

Point of Contact

Any questions pertaining to this response should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
VA Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

December 16, 2010

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe, LLP
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B

Dear Mr. Von Loewenfeldt:

This letter summarizes the content of the initial documents we are supplying in response to the Freedom of Information Act (FOIA) requests from you and Mr. Daniel Zaheer. As noted in a telephone call to you earlier today from Ms. Kristan Hoffman, on behalf of Stephen Wurtz, our office is providing this information to you at no charge. Mr. Wurtz will be contacting you next week to further discuss the fee estimate for the additional documents you requested. In the meantime, if you have any difficulty in identifying the proper document or information in the document, please call me.

Explanation of Enclosed Information

The information below explains each of the pieces of information enclosed in this initial response.

With regard to the FOIA request, dated September 2, 2010, that you sent to this office (tracking # 10-11722-F), we have enclosed the following initial documents:

For questions 1 through 3 below, you stated that information dating from 1998 to the present would suffice.

Request # 1—Enclosed are the June *VA Monthly Reports* for years 1998 through 2010, response pages #1-95. The June reports include year-to-date figures for the policy year, which runs from July 1st through June 30th each year. These reports will show the number of claims paid in response to your requests 1a, 1c, and 1d. Please note that these records are not maintained by the number of “beneficiaries”, but rather by the number of claims, that is, the number of deaths. The information requested for 1b is enclosed on response page # 96, titled *TSGLI Benefits By Policy Year*. Please note that the TSGLI program was established in December 2005.

Request #2—Regarding your requests in 2a, 2c, and 2d, we have no records responsive to these requests. The information requested in 2b is enclosed, and can be located on response page # 96, which is referenced in our response to request #1 above.

Request #3—The information requested for 3a, 3c, and 3d is included in the *VA Monthly Reports* cited in request #1 above, response pages #1-95. The information requested for 3b is enclosed,

2.

and can be located on response page #96, which is referenced in our response to request #1 above.

Request #4—As there is no “fee” paid to Prudential Insurance Company of America (hereafter referred to as “Prudential”) for administering the SGLI programs, we interpreted and you concurred that requests 4a, 4b, and 4c pertain to the payment for reimbursable expenses incurred by Prudential in their administration of the Servicemembers’ and Veterans’ Group Life Insurance (SGLI/VGLI) programs. Enclosed are the *Servicemembers’ and Veterans’ Group Life Insurance Programs Annual Reports* for the 30th through 45th policy years, which correspond to reports ending June 30, 1996 through June 30, 2010, each of which consist of a title page and are between 16 and 19 pages in length. The cover of each booklet is numbered, response pages #97-112.

Request #5 – We have enclosed a document on response page #113, which is the only record we have that is responsive to your request.

Request #6 – The document on response page #113 in request #5 above, is also the only document we have that is responsive to your request.

Request #9—We have enclosed copies of the following documents that are responsive to this request:

- A document that is an excerpt from the minutes of the 1998 and 1999 meetings of the SGLI Advisory Council, response pages #114-116.
- Excerpts from a copy of the FY 2000 and FY 2001 Department of Veterans Affairs Budget Submission, response pages #117-128.
- SGLI Handbook published and posted to the VA Insurance website in December 2000, response pages #124-162.
- A slide deck presentation given at the December 17, 1998 SGLI Advisory Council meeting, response pages # 163-171.
- An excerpt from Director Thomas M. Lastowka’s September 25, 2003 testimony before the House Committee on Veterans’ Affairs, Subcommittee on Benefits (this document is also available on the VA web site), response page #172.
- A news article from the American Forces Press Service dated October 14, 1999, response page #173.

Request #10—We have interpreted this question when referring to the Department of Veterans Affairs and/or the Veterans Benefits Administration to be applicable only to the VA Insurance Service. In response to this request, we have enclosed the following documents:

- A series of emails that discuss the Alliance Accounts in the applicable time period of 1998-1999, response pages #175-180 (Note: There is no response page #174).
- A sample copy of the documents related to the Alliance Account that were provided by Prudential to the first beneficiaries to receive payment via the Alliance Account in 1999 (informally known as the Alliance Account “kit”), response pages #181-191.

3.

- An excerpt from the minutes from the 1998 and 1999 meetings of the SGLI Advisory Council referenced in request #9 above, response pages #114-116.
- A copy of the slide deck referenced in request #9 above, response pages # 163-171.

With regard to the FOIA request, dated August 25, 2010, that Mr. Daniel Zaheer sent to our office (tracking # 10-10948-F), we have enclosed the following initial documents:

Note: For requests #2-5, the monthly report cited in these questions all refer to the *VA Monthly Report* cited in request #1 of your September 2, 2010 FOIA request.

Request #2—The *VA Monthly Report* is already being provided with this letter in the manner referenced in request #1 of your September 2, 2010 FOIA request.

Request #3—The *VA Monthly Report* is already being provided with this letter in the manner referenced in request #1 of your September 2, 2010 FOIA request. However, please note that there is no such report titled *OSGLI Monthly Report Statement Of Financing and Net Position*. There was a typographical error in a footnote below a chart that referred to all VA Insurance Programs—there should have been a semicolon between the name *OSGLI Monthly Report* and the name *Statement of Financing and Net Position*. VA does produce a *Statement of Financing and Net Position*. However, that is for our in-house VA-administered programs and is not applicable to the SGLI/VGLI programs that are administered by Prudential.

Request #4—The *VA Monthly Report* is already being provided with this letter in the manner referenced in request #1 of your September 2, 2010 FOIA request.

Request #5—The *VA Monthly Report* is already being provided with this letter in the manner referenced in request #1 of your September 2, 2010 FOIA request.

Request #6—We have interpreted the term “report” to refer to documents that include specific data elements regarding the SGLI and/or VGLI programs. In response to this question, the *VA Monthly Report* is already being provided with this letter in the manner referenced in request #1 of your September 2, 2010 FOIA request. In further response, we have enclosed the annual *SGLI Policy Year Exhibits* (aka *Statement of Annual Accounting* and *Statement of Separate Accounting*) for the time period 1995 to 2010, response pages #192-440.

We also receive a semi-annual, in-depth review of the consistency of adjudication of TSGLI claims across the branches of service, which are tasked by law with adjudicating TSGLI claims. We believe this 25-page report is not germane to the gravamen of your request, so we have not included it. However, if you do want this report, we can provide it.

Request #8—The Insurance Service is not responsible for publishing the Veterans Benefits Administration (VBA) Annual Benefits Report. However, you may view the requested 1995-1998 Annual Benefits Reports at the following link from the VA web site:
www.vba.va.gov/REPORTS/abr/index.asp.

4.

Request #14—We have already provided you with a copy of the current Servicemembers' and Veterans' Group Life Insurance Handbook in our response to request #9 from your September 2, 2010 FOIA request. We will forward the 2001-2009 versions of the handbook to you via email. We do not have records responsive to your request for versions of the handbook prior to 2000.

Request #15—A copy of the 2010 *VA Life Insurance Programs for Veterans and Servicemembers Handbook* is available on our website. This annual publication is designed as an informational booklet. We do not believe it is germane to the gravamen of your request. In the interest of avoiding unnecessary costs to you, we have not provided earlier versions. We would be able to provide an electronic copy of each version of the handbook from year 2000 to the present. We are also able to provide a copy of each version of the handbook for years 1995-1999; however, if you want these versions, it will be necessary to provide you with a fee estimate for this request. The fee estimate is necessary for years 1995-1999 due to the necessity to duplicate the requested documents from booklets that currently exist only in a print version. Please advise us if you want either the electronic and/or hard copy versions of these publications.

Request #26— In each of the SGLI Policy Exhibits referenced in Mr. Zaheer's request #6 is an exhibit titled *Exhibit of OSGLI and Non-OSGLI Expenses* for each Policy Year. This exhibit classifies the annual reimbursement into rendered services. Prudential does not send billing statements to VA for their administrative reimbursement. The requested documents can be located on the last page of this report for each policy year.

Point of Contact

Again, Mr. Wurtz will be in contact with you next week to discuss your additional requests and provide details on the fee estimates and timeframe for providing additional documents to you. Any questions pertaining to this response should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
VA Insurance Service

Enclosures



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

February 14, 2011

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B
FOIA # 10-11722-F
FOIA # 10-10948-F

Dear Mr. Von Loewenfeldt:

Pursuant to your request, I have enclosed the additional information that you requested in regard to the delayed claim interest rate paid by the Office of Servicemembers' Group Life Insurance (OSGLI) for the years 1999-2010. The request is numbered from pages 441-571.

Our office is unable to provide the requested information for the following months:

July 2001; October 2001; November 2001; December 2001; January 2002; February 2002; March 2002; April 2002; May 2002; July 2002; August 2002; September 2002; October 2002; and November 2002.

If you have any questions about the enclosed information, please do not hesitate to contact me at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

April 20, 2011

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B
FOIA # 10-11722-F
FOIA # 10-10948-F

Dear Mr. Von Loewenfeldt:

This letter summarizes the content of the documents the VA Regional Office and Insurance Center (ROIC) has provided in response to your Freedom of Information Act (FOIA) request, dated September 2, 2010, and the FOIA request submitted by Daniel Zaheer, dated August 25, 2010.

In correspondence dated December 16, 2010, the ROIC provided hard copy records responsive to the following items from your FOIA request: # 1, 2 (partial response), 3, 4, 5, 6, 9, and 10.

In the same correspondence dated December 16, 2010, the ROIC provided hard copy records or links to the information responsive to the following items from the FOIA request of Mr. Daniel Zaheer: # 2, 3, 4, 5, 6, 8, 14, 15, and 26. The records responsive to both requests were numbered from pages 1-439.

In correspondence dated February 14, 2011, the ROIC provided hard copy records responsive to your request in reference to the SGLI/VGLI delayed claim interest rate, page # 441-571.

In correspondence dated April 4, 2011, the ROIC provided hard copy records responsive to your request in reference to the report titled "Program Evaluation of Benefits for Survivors of Veterans with Service-Connected Disabilities", page # 572-574.

With regard to item # 42 from Mr. Zaheer's FOIA request, we previously advised Mr. Zaheer by correspondence dated October 8, 2010 that this item had been referred to VA Central Office (VACO) for a reply. You will shortly be notified by correspondence from VACO that it has since been determined that responsibility for a response to this item would be more fully and appropriately addressed by the ROIC; the documents you receive with this transmission include those associated with # 42.

Enclosed with this correspondence, the ROIC is providing the following records in response to the consolidated FOIA request from you and Mr. Zaheer: emails that discuss the Alliance

Accounts from July 1, 2010 to September 2, 2010. Emails to or from Mr. Stephen Wurtz, Deputy Assistant Director for Insurance, are provided in the folder titled "PrudentialFOIA". Emails to or from other staff members of the Insurance Service are provided in the folder titled "PrudentialFOIA2".

However, not all emails that discuss the Alliance Account and are dated from July 1, 2010—September 2, 2010 have been released. The ROIC has denied the release of some emails under Exemption 5 of the Freedom of Information Act (5 USC 552 (b)(5)).

Deliberative Process Privilege, Exemption 5

The Deliberative Process Privilege from Exemption 5 is invoked. The ROIC was guided by the major "Exemption 5" decision issued by the D.C. Circuit Court of Appeals in *Petroleum Information Corp. v. United States Department of the Interior*, 976 F.2d 1429, 1435 (D.C. Cir. 1992). That appellate court placed new emphasis on whether the deliberative process in question is a "process by which policy is formulated." "A policy judgment in the decisional process" is a strong factor compelling the applicability of Exemption 5.

In addition to the above analysis, all the related documents were reviewed and analyzed applying the "foreseeable harm" standard within the realm of the deliberative process privilege, under "Exemption 5." Emails that are protected from disclosure are predecisional and are a direct part of the deliberative process for the following reasons:

- Disclosure would likely diminish the candor of VA's deliberations in the confidentiality of the decision making process.
- To encourage the "free and uninhibited exchange . . . of opinions, ideas, and points of view" within VA's decision making process.
- Age of the information.
- Individual sensitivity of each item of information. Factual information, which ordinarily does not implicate the policies underlying the deliberative process privilege, has been held to fall within the privilege's broad sweep on the basis of "the context in which [it is] used." *Wolfe v. HHS*, 839 F.2d 768, 774 (D.C. Cir. 1988) (en banc).
- Virtually all "draft" documents that are prepared by an agency, on the basis that the very process of evolving a "draft" into a "final" document qualifies for privilege protection. *See, e.g., Dudman Communications Corp. v. Department of the Air Force*, 815 F.2d 1565, 1568-69 (D.C. Cir. 1987).

Moreover, the law is clear that, so long as the information in question was created prior to the particular decision that was involved, it can retain its privileged status (and remain technically exempt under the FOIA) long after the decision making process has concluded—potentially, forever. *See, e.g., May v. Department of the Air Force*, 777 F.2d 1012, 1014-15 (5th Cir. 1985).

Appeal Rights

If you consider the above response as an adverse determination, you may appeal this decision by forwarding a letter to General Counsel (024), Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington DC 20420. The appeal should be marked, both on the envelope and the face of the appeal letter, with the legend "FREEDOM OF INFORMATION ACT APPEAL." A copy of your original request and this response should accompany your appeal with detailed justification for your opposition to this response. I am responsible for processing your request.

Point of Contact

This concludes our response to this request. Any questions pertaining to this request should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

April 22, 2011

Mr. Michael Archuleta
1100 Lakeway Drive
101
Austin, TX 78734

In Reply Refer To:
310/290B
FOIA # 10-04704-F

Dear Mr. Archuleta:

Per our discussion and agreement on March 31, 2011, the remaining items from your FOIA request, items numbered 2, 3, 6, and 7, may now be obtained from Mr. Michael Von Loewenfeldt of the firm Kerr & Wagstaffe. Our office recently forwarded the records approved for release under the Freedom of Information Act to Mr. Von Loewenfeldt; I have enclosed a copy of our correspondence to him for your review.

This concludes our response to this request. Any questions pertaining to this request should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
Insurance Service

Enclosure



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

May 10, 2011

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B
FOIA # 10-11722-F
FOIA # 10-10948-F

Dear Mr. Von Loewenfeldt:

In response to your request, dated May 6, 2011, I have enclosed copies of the 1999, 2000, 2001, 2002, 2003, 2004, and 2010 SGLI Advisory Council Minutes. The enclosed copies are numbered from pages 575-581.

Any questions pertaining to this request should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
Insurance Service



DEPARTMENT OF VETERANS AFFAIRS
Regional Office and Insurance Center
Wissahickon Avenue and Manheim Street
P. O. Box 8079
Philadelphia PA 19101

May 24, 2011

Mr. Michael Von Loewenfeldt
Kerr & Wagstaffe
100 Spear Street, Suite 1800
San Francisco, CA 94105

In Reply Refer To:
310/290B
FOIA # 10-11722-F
FOIA # 10-10948-F

Dear Mr. Von Loewenfeldt:

This correspondence is in response to your Freedom of Information Act (FOIA) request, dated May 6, 2011, regarding the existence of any emails with Prudential about the Alliance Accounts prior to July 2010, other than the four emails which were previously forwarded to your attention.

Deputy Assistant Director for Insurance Stephen Wurtz has reviewed his correspondence and determined that six (6) emails exist prior to July 1, 2010 in which the topic of the Alliance Accounts was discussed between him and Prudential.

Upon review it has been determined that release of these emails is appropriately denied under Exemption 4 of the FOIA. Exemption 4 protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential" 5 USC 552 (b)(4).

If you consider the above response as an adverse determination, you may appeal this decision by forwarding a letter to General Counsel (024), Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington DC 20420. The appeal should be marked, both on the envelope and the face of the appeal letter, with the legend "FREEDOM OF INFORMATION ACT APPEAL." A copy of your original request and this response should accompany your appeal with detailed justification for your opposition to this response. I am responsible for processing your request.

This concludes our response to this request. Any questions pertaining to this request should be directed to my attention at phone # 215-842-2000, ext. 4839.

Sincerely,

Jeanne King
FOIA Officer
Insurance Service