
MEMORANDUM

TO: MARC MIHALY

FROM: TOM ABDELNOUR, VERMONT STATE EMPLOYEES' ASSOCIATION
(VSEA)

SUBJECT: S. 230 PARKING LOT LANGUAGE

DATE: MAY 15, 2026

CC: THE MEMBERS OF THE HOUSE COMMITTEE ON GENERAL AND
HOUSING

There is an exception in Vermont State Facilities Rule 00001 that means that the normal prohibitions against solicitation on state property do not currently apply to the parking lots of Vermont's correctional facilities. Section 1 of that rule, in relevant part, states:

"These rules do not apply to State Correctional Facilities occupied by the Department of Corrections unless so designated in certain areas by the Commissioner of Corrections."

This exception exists because when the facilities rules banning most solicitation in the parking lots of State facilities were passed, those drafting the rule assumed that Vermont's correctional facilities would need even *more* stringent rules on solicitation, given the unique security challenges posed by the nature of those facilities. They assumed the Commissioner of Corrections would want the latitude to adopt an even more stringent policy. Instead, no such policy was ever enacted.

As a result, there is currently no active prohibition on solicitation in the parking lots of Vermont's correctional facilities.

As a result of this gap in the existing rule, VSEA members have found themselves subject to unwanted and unwelcome solicitation as they move from their vehicles to the correctional facilities to begin their shifts— and vice versa. Members have stated that this onslaught of solicitation has made them feel uncomfortable, and that they find the situation less than secure given the sensitive nature of their work.

In an attempt to resolve this issue, VSEA raised this situation with the Senate Committee on Economic Development, Housing, and General Affairs. Consequently, the Committee heard testimony from: Al Gordon O'Connell, VSEA's General Counsel and an expert in labor law; from Legislative Counsel, and from myself. They also received written comments from BGS Commissioner Wanda Minoli.

As a result of this testimony from the relevant stakeholders, Senate Economic Development amended S. 230 with the language your committee reviewed this morning. This language would merely facilitate an ongoing conversation between Buildings and General Services, the Department of Corrections, and VSEA.