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January 24, 2022

VIA EMAIL

Andrew Quemere
aquemere0@gmail.com

RE: Public Records Request, Brady/Giglio materials

Dear Mr. Quemere:

I am writing in response to your public records request received by this Office on January 11, 2021 for the following materials:

1. *The office's Brady list, which refers to a list of law enforcement officers who have credibility issues or other concerns that might need to be disclosed to defendants in criminal cases*

This Office does not maintain a so-called "Brady list." Rather, in an effort to comply with our obligation to disclose potential impeachment material relative to any law enforcement officer who is "is a potential witness or prepared a report in [a] criminal investigation," see Matter of A Grand Jury Investigation, 485 Mass. 641, 658 (2020), we have created a database containing written disclosures related to certain officers and troopers. The database is updated continuously.

2. *All Brady information, meaning all records concerning individual law enforcement officers that might need to be, or have been, disclosed to defendants in criminal cases*

Attached please find a PDF file consisting of the so-called "Brady information" that is presently in our database as described above. If such materials contain information relating to the criminal prosecution of a trooper or officer, all names, case captions and docket numbers have been redacted, as those materials constitute Criminal Offender Record Information that this Office is precluded from producing. See G.L. c. 6, § 167.

3. *All communications with criminal defendants and/or defense counsel advising them of the existence of Brady information or an officer's placement on a Brady list*

This Office does not maintain a centralized record of all disclosures made from the database described above. As such, this Office is unable to respond to your request, as it would require

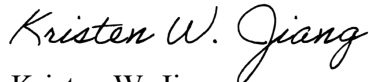
staff to review the file for every single case that this Office has prosecuted during the relevant period—i.e., the preceding twelve years.¹

4. *All communications with police departments or individual officers regarding the existence or disclosure of Brady information or an officer's placement, or potential placement, on a Brady list*

Attached please find a copy of a letter from District Attorney Jonathan W. Blodgett to the police department chiefs in Essex County on April 8, 2021. All records received in response to these letters that would trigger a disclosure responsibility under Matter of A Grand Jury Investigation, 485 Mass. 641, 658 (2020) have been added to the database referenced above.

You may seek review of this response under the provisions of 950 C.M.R. 32.00 (appeal to Supervisor of Public Records) and G.L. c. 66, § 10(b) (civil action in Superior Court).

Sincerely,



Kristen W. Jiang
Assistant District Attorney

Enclosures

¹ You clarified by email on January 17, 2022 that you are seeking responsive records from 2010 to the present.