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March 19, 2020

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Dear Counsel,

Pursuant to *Brady v. Maryland*, 373 US 83 (1963) and *Giglio v. United States*, 405 US 150 (1972), I am disclosing the following information:

Stephen Bunnell, formerly a Captain for the Caledonia County Sheriff's Department, is under pending criminal investigation. The investigation stems from information gathered in a criminal case (*State v. Ehmann* 94-2-20 Cacr) wherein it appears the then-Captain Bunnell engaged in communications with a female defendant. That communication is available by request for any case in which Mr. Bunnell was the investigating officer. He has since resigned from the Caledonia County Sherrif's Department.

The investigation into this behavior has been ongoing and pending since April 2020.

This letter serves to update that the investigation remains ongoing, and, consistent with 1 V.S.A. §317(c)(5)(A)(i)(ii)(iii), no further materials are available at this time.

My office, as you may be aware, is not overseeing the current investigation and does not have any further information at this time.

The above stated information is disclosed consistent with the State's Constitutional and ethical requirements, including V.R.Cr.P. 16(a)(2)(G) and (b)(2) to ensure awareness of this matter for purposes of discovery and disposition of pending cases where Mr. Bunnell was the investigating officer.

At this time, my office is not aware of any pending cases where Mr. Bunnell was the investigating officer.

Thank you.