

From: [Kennedy, Rosemary](#)
To: [Meenan, Evan](#)
Subject: FW: Giglio letter FOIA request
Date: Thursday, January 27, 2022 11:17:29 AM

From: Kennedy, Rosemary
Sent: Thursday, October 8, 2020 10:11 AM
To: Brickell, Christopher <Christopher.Brickell@vermont.gov>; Kilcullen, Brian <Brian.Kilcullen@vermont.gov>; Humphries, William <William.Humphries@vermont.gov>; Dumas, Ed <Ed.Dumas@vermont.gov>; Mantello, Peter <Peter.Mantello@vermont.gov>; Fox, David J <David.J.Fox@vermont.gov>
Cc: Barber, Christopher <Christopher.Barber@vermont.gov>; Dion, Michael <Michael.Dion@vermont.gov>; Whit Montgomery <whit@killingtontown.com>; Chief Mike Warfle (policechief@pittsfordvermont.com) <policechief@pittsfordvermont.com>
Subject: RE: Giglio letter

Good morning,

I know there are a lot of questions about *Giglio*, I have spoken to some of you individually about these issues.

There are a lot of articles out there, if you just google *Giglio*, but I thought this was a good, quick overview.

<https://ggrmlawfirm.com/blog/in-the-news/what-police-officers-need-to-know-about-giglio-v-united-states/>

I think it is important for you to discuss this issue with your own counsel regarding your obligations as an employer and as a Chief/Supervisor/Sheriff.

For my purposes, the general rule is to disclose **what could be argued** as evidence of bias or lack of credibility; not what you or I believe, but what a defense attorney could argue as such. Please be honest about these issues and deal with them openly.

Keep in mind that disclosure under *Giglio* does not necessarily mean the end of a prosecution – although it could, depending on the seriousness of the offense.

Thank you,

Rose