

STATE'S ATTORNEY
WARD H. GOODENOUGH

VICTIMS' ADVOCATE
Meghan L. Place
John E. Grandi

DEPUTY STATE'S ATTORNEY'S
Glenn J. Barnes
Glennis M. Gold
Emily E. Zukauskas
David H. Kahn
Eliza Novick-Smith



ADMINISTRATIVE STAFF
Stephanie L. Jordan
Melinda Heins

STATE OF VERMONT
WINDSOR COUNTY STATE'S ATTORNEY
5 South Main Street, Suite 208
White River Junction, VT 05001
Office: (802) 295-8870 / Fax: (802) 295-8878

July 26th, 2021

Dear Defense Counsel,

This notice is provided pursuant to the State's discovery obligation under V.R.Cr.P. 16, *Brady v. Maryland*, 363 U.S. 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972).

The Windsor County State's Attorney's Office has received information that Shaun Smith, while employed as a law enforcement officer at the Springfield Police Department in 2020 committed several acts of untruthfulness. These acts are detailed in the accompanying letter from Springfield Police Chief Mark Fountain.

In addition to Chief Fountain's letter, our office has received an internal affairs report (See the PDFs marked SPD Report pt 1 – pt 4), as well as two accompanying disks, which include the videos and recorded interviews that are referenced in the written materials. While these materials are too large to share via email, they can be downloaded at the following link for the next 30 days (<https://www.dropbox.com/t/ZelwiiioxH20o18zg>).

These materials outline incidents of untruthfulness, principally connected to an internal investigation that was conducted by the Springfield PD into alleged misconduct. Since leaving Springfield near the onset of the internal investigation, Shaun Smith has been employed as a law enforcement officer at the Woodstock Police Department.

Kindly contact me directly if you have any questions or concerns about this information. Please note, however, that my office does not employ Shaun Smith and consequently does not maintain a personnel file on him. The materials included in this email and in the accompanying link constitute the entirety of documentation our office possesses on this matter.

Yours,

A handwritten signature in blue ink, appearing to read 'W.H.G.', written over a horizontal line.

Ward H. Goodenough
Windsor County State's Attorney
5 South Main Street, Suite 208
White River Junction, VT 05001
802-295-8870