



Michael W. Morrissey  
District Attorney

# The Commonwealth of Massachusetts

Office of the District Attorney  
FOR THE NORFOLK DISTRICT

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January 25, 2022

Andrew Quemere  
Aquemere0@gmail.com

SENT VIA EMAIL

Re: Public Records Request

Dear Mr. Quemere:

This responds to your January 10, 2022 records request to the Norfolk District Attorney's Office (the "NDAO") in which you requested under the Massachusetts public records law, G.L. c. 66, §10:

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
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
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
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

The NDAO responds to each requests as follows.

- 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**

The NDAO interprets your request as seeking the NDAO's list of police officers or Massachusetts State Police Troopers that the NDAO would provide defense counsel notice. This list was last updated January 24, 2022 and is always subject to revision based on the receipt of additional information.

Last Name	First Name	Rank	Department
Adams	John F.		MSP
Andrade	Nidu		MSP

Atton	Michael		MSP
Augusta	Mark		MSP
Barrett	Julie Ann		Plainville
Beaupre	George	Sgt.	MSP
Berra	David		MSP
Bishop	Patrick		Norwood
Blake	Matthew		Dedham
Boszko	Anthony		MSP
Brown	Christopher		MSP
Cesan	Paul E.		MSP
Chin	Eric S.		MSP
Church	Robert		MSP
Conneely	Paul		MSP
Corliss	Thomas	Lt.	Quincy
Crespi	Daniel		MSP
DeJong	Daren		MSP
Doukas	Matthew		Needham
Erickson	Bryan		MSP
Farwell	Matthew		Stoughton
Fogwill	Kevin		MSP
Fonseca	Casille		MSP
Forte	David		Needham
Gallagher	Charles		Foxborough

Genduso	Leigha A.		MSP
Giulino	John	Lt.	MSP
Glidden	Todd		MSP
Griffin	Daniel	Lt.	MSP
Hamilton	George	Sgt.	MSP
Hannon	Mark		MSP
Hebb	Arthur	Sgt.	MSP
Herman	Gary		MSP
Higgins	Paul E.		MSP
Johnson	Gerald		MSP
Keefe	David	Lt.	MSP
Kelleher	William		Needham
Kelley	Matthew		MSP
Lima	Kevin		Stoughton
Lio	Patricia		Milton
MacKenzie	Christopher		Walpole
McAuliffe	Heath P.		MSP
Minukas	Steve		Quincy
Molinari	Louis		Weymouth
Murphy	Brendan		MSP
Outwater	Robert		MSP
Perreault	David		MSP
Raftery	Gregory		MSP

Reger	Jeffrey		MSP
Roake	Kevin		Norfolk
Robertson	William		MSP
Russell	Jeffrey		MSP
Schoener	Michael		Dedham
Sheehan	Matthew J.		MSP
Slowe	William		Needham
Sundberg III	Robert A.		MSP
Sweeney	Kevin B.		MSP
Thorpe	Michael	Sgt.	MSP
Twomey	John		
Wilmot	Michael		MSP
Wilson	David W.	Lt.	MSP
Wosny	John S.		MSP
Zopatti	Susan		Braintree
Zorzi	Paul E.		Norwood

**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.**

The NDAO interprets your requests as seeking records concerning those police officers or Massachusetts State Police Troopers that the NDAO has determined it would provide defense counsel notice. At this time, the NDAO has determined it would provide defense counsel notice of 64 police officers or Massachusetts State Police Troopers. The NDAO possesses files for each individual containing records responsive to this request. The NDAO estimates that it would take approximately 30 minutes to review and redact each file as required by law. Additionally, because these files currently exist in a physical format, it will take an additional 10 hours to compile and individually scan each document as you have requested. Therefore, the NDAO estimates it would take approximately 42 hours to complete this request (((25 minutes x 64 files) ÷ 60 minutes) + 10

hours = 42). Considering the breadth and difficulty of this request, I would suggest a modification to the scope of your request, such as identifying certain individual officers or police departments.

**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.**

The NDAO cannot fulfill this request as the breadth and difficulty of this request would unduly burden the other responsibilities of the NDAO. In order to fulfill this request, the NDAO would need to review each case file in the office's possession. The NDAO possesses thousands of case files. Alternatively, the NDAO may provide samples of notices to be or have been provided to defense counsel.

**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.**

The NDAO possesses communications, including email communications responsive to this request. The NDAO estimate it would take approximately 5 hours to search for and compile the responsive communications. It would also take an additional 15 hours to review and redact the email communications as required by law. Therefore, the NDAO estimates it would take approximately 20 hours to complete this request. Considering the breadth and difficulty of this request, I would suggest a modification to the scope of your request, such as identifying certain individual officers or limit the request to a specific date range.

If you wish to proceed with these requests as is, please be advised that in accordance with the Public Records law, the NDAO would charge \$25 per hour for time in excess of four hours spent searching for, compiling, and redacting the records as required by law. See G.L. c. 66, §10(d).<sup>1</sup> Based on the estimate provided above, it would cost approximately \$1,450 ((62 hours – 4 hours) x \$25) to complete this request. Due to the volume of materials and the other responsibilities of this office, I estimate this request would take at least 15 weeks to fulfill. Should you wish to proceed with the request as is, please send a check for \$1,450 payable to the Commonwealth of Massachusetts – Norfolk District Attorney's Office. If the amount of the estimate exceeds the actual costs, any excess will be refunded, if the estimate is lower than the actual cost, you will be responsible for paying the difference. Please let me know how you would like to proceed and please be advised that you have a right to appeal this response to the supervisor of records. See G.L. c. 66, § 10A.

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<sup>1</sup> In accordance with C.M.R. 32.07(2)(i), a records access officer shall assess no fee greater than the lowest hourly rate of a person capable of compiling, segregating, redacting and reproducing a requested record, subject to the requirements of 950 CMR 32.07. The records access officer shall not assess a fee greater than \$25 per hour. As the lowest hourly rate of the individual capable of compiling, segregating, redacting and reproducing the requested records is greater than \$25, the NDAO has determined it would assess a fee of \$25 per hour.

Kindest Regards,

*/s/ Meagen K. Monahan*

Meagen K. Monahan  
Assistant District Attorney  
Primary Records Access Officer  
Norfolk District Attorney's Office