

July 16, 2021

Chief Matthew Sonnabend  
Barnstable Police Department  
1200 Phinney's Lane  
Hyannis, MA 02601

**RE: Commonwealth v. XXXXX**  
**Criminal Docket Number: 1872CR00000**  
**Barnstable Superior Court**

Dear Chief Sonnabend:

Please be advised that the above captioned case is scheduled for trial on August 21, 2020 at Barnstable Superior Court.

The following is a list of officers from your department that are potential witnesses in this case:

1. Det. XXX
2. Det. XXX (Retired)
3. Off. XXX

Also, please provide any information for officers not listed that were involved in the case.

As you are aware, the District Attorney's Office is required to disclose any material that is "favorable to the accused" whether it is possibly exculpatory or constitutes material that may impeach the testimony of a police officer. See *Brady v. Maryland*, 373 U.S. 83, 87 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972) in the matter of the Grand Jury 485 Mass. 41(2020). The prosecutor's obligation extends to any information in the possession of any police department involved in the prosecution.

To that end, I request that you provide the names and supporting information of any of the above names officers who fall into the following categories:

1. Any convictions and continuations without a finding of any criminal offense in which the officer was defendant

2. Any open criminal charges against an officer
3. Any final findings of untruthfulness or other misconduct implicating credibility
4. Any final findings that an officer has engaged in any pattern of bias, racial profiling, or discrimination
5. Any final findings that an officer has utilized excessive or unreasonable force

Thank you in advance for your cooperation in this matter.

Very truly yours,

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Michael A. Trudeau  
First Assistant District Attorney

