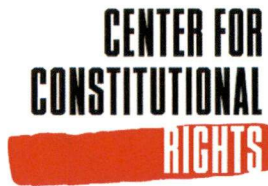


Exhibit A



June 16, 2025

BY EMAIL TO:

mlemon@rankincounty.org

Attn: John Bramlett, Jr.
Rankin County District Attorney
215 E Government St (2nd Floor)
Brandon, MS 39042

Re: Public Records Request

Dear District Attorney Bramlett:

The American Civil Liberties Union of Mississippi (“ACLU-MS”) and Center for Constitutional Rights (“CCR”) submit this request for public records concerning your office’s response to revelations about systemic unlawful conduct by deputies in the Rankin County Sheriff’s Office Narcotics Division, given the moniker the “Goon Squad”. By now, it is well documented that the Goon Squad, over the course of two decades, used torture, extreme violence and other abusive practices to coerce confessions and extract or manufacture evidence.¹ This illegally seized evidence led to hundreds of convictions. As you rightly recognized, the Goon Squad’s actions “violated the public trust and shook the foundation of our justice system.”²

In light of these revelations, your office has obligations, under the United States and Mississippi Constitutions, to review cases to determine whether they were affected by the Goon Squad’s misconduct and to disclose exculpatory and impeachment evidence relating to such cases.³ Our understanding is that your office has begun the process of reviewing certain affected cases, although the scope and nature of the review has not been disclosed to the public.⁴

¹ See, e.g., N.Y. Times, *How a ‘Goon Squad’ of Deputies Got Away With Years of Brutality* (Mar. 27, 2025), <https://www.nytimes.com/2023/11/30/us/rankin-county-mississippi-sheriff.html>; Mississippi Today, *Former Mississippi sheriff’s deputy describes rampant violence by ‘Goon Squad’* (Feb. 21, 2025), <https://mississippitoday.org/2025/02/21/ex-deputy-describes-rampant-violence-by-goon-squad/>.

² Mississippi Today, *Rankin County DA Reviewing ‘Goon Squad’ Cases. Legal Experts Say That’s Not Enough*. (Mar. 11, 2024), <https://pulitzercenter.org/stories/rankin-county-da-reviewing-goon-squad-cases-legal-experts-say-thats-not-enough>.

³ See, e.g., *Brady v. Maryland*, 373 U.S. 83 (1963); *Giglio v. United States*, 405 U.S. 150 (1972); *Kyles v. Whitley*, 514 U.S. 419 (1995).

⁴ See, e.g., Mississippi Today, *Rankin County DA Reviewing ‘Goon Squad’ Cases. Legal Experts Say That’s Not Enough*. (Mar. 11, 2024), <https://pulitzercenter.org/stories/rankin-county-da-reviewing-goon-squad-cases-legal-experts-say-thats-not-enough>.

June 16, 2025

Accordingly, ACLU-MS and CCR submit the following request for records pursuant to the Mississippi Public Records Act of 1983 (“PRA”), Miss. Code Ann. § 25-61-1, et seq.⁵

1. Provide the case list or similar record showing the case names and docket numbers of all cases that any member of the Goon Squad⁶ has been involved in, whether by investigating or testifying, in the last four years.
2. All policies, memos, and internal guidelines within the Rankin County District Attorney’s Office for disclosing exculpatory and/or impeachment evidence.
3. All policies, emails, memos, or other records between 2022 and 2024, inclusive, reflecting actions taken by the Rankin County District Attorney’s Office in response to revelations regarding the Goon Squad’s misconduct, including, but not limited to:
 - a. Records regarding the Rankin County District Attorney’s Office’s process for identifying cases affected by the Goon Squad’s misconduct;
 - b. Records regarding the Rankin County District Attorney’s Office’s process for determining whether to dismiss or otherwise resolve cases that have been affected by the Goon Squad’s misconduct;
 - c. Records regarding actions taken by the Rankin County District Attorney’s Office to prohibit or deter misconduct by law enforcement.
4. All policies and internal guidelines regarding the Rankin County District Attorney’s Office’s process for evaluating plea offers or plea deals with defendants (other than identifying, disclosing exculpatory and impeachment evidence in, and dismissing or otherwise resolving cases affected by such misconduct).
5. Communications between the Rankin County District Attorney’s Office and members of the Goon Squad between 2022 and 2024, inclusive,

⁵ The American Civil Liberties Union of Mississippi seeks to protect the civil liberties and civil rights of all Mississippi residents.

⁶ For purposes of this public records request, “Goon Squad” is any member of the “Goon Squad” and includes but is not limited to, Chief Investigator Brett McAlpin, Christian Dedmon, Jeffrey Middleton, Hunter Elward, and Daniel Opdyke; Richland police officer Joshua Hartfield; and James Rayborn, Luke Stickman, and Cody Grogan. *See* N.Y. Times, *How a ‘Goon Squad’ of Deputies Got Away With Years of Brutality* (Mar. 27, 2025), <https://www.nytimes.com/2023/11/30/us/rankin-county-mississippi-sheriff.html>.

June 16, 2025

including but not limited to communications to or from Chief Investigator Brett McAlpin regarding the use of warrantless raids.⁷

6. Communications to or from the Rankin District Attorney's Office between 2022 and 2024, inclusive, referring to any member of the Goon Squad.

Records: Please note that the term "records" as used herein includes all records preserved in electronic or written form, including but not limited to all documents such as agendas, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, technical manuals, technical specifications, training manuals, and studies; all communications and other correspondence such as emails, texts, voicemail messages, social media posts and online comments, direct messages ("DMs"), and faxes; and all other electronic data or audiovisual materials such as video recordings, audio tapes, and live-stream recordings. Emails, social media and other online comments, DMs, texts, voicemail messages, and faxes should be produced whether sent to or from city officials' personal or official accounts or websites.

Format of Production: All electronic records should be produced in their native or original electronic format. All non-electronic records may be scanned and sent electronically or copied and sent to the address below.

Withheld documents and redactions: If you withhold any document responsive to this request on the ground that it is exempt, identify the date and title of the document, its author, and to whom it was sent, and identify the specific statutory exemption you claim prevents its release along with a brief explanation of why that exemption is proper. In addition, this request is made with the assumption that you will redact any such information that, without redaction, would otherwise preclude you from complying fully with this request. For any redactions, please provide the specific exemption you are claiming for each instance of redaction. In addition, ensure the redactions are clearly delineated and identified so that a redaction can be differentiated from a blank section of the record.

Response: For each section or subsection above, either produce the record, identify the record cannot be produced, or inform us of its non-existence.

⁷ See N.Y. Times, *Ex-Deputy Describes Rampant Violence by Mississippi 'Goon Squad'* (Feb. 21, 2025), ("He said deputies were entering homes without warrants so often that in 2022 a senior detective warned him that prosecutors in the district attorney's office had noticed and demanded they stop... Mr. Dedmon said it was Mr. McAlpin who passed on a warning from a prosecutor in the district attorney's office...")

Page 4 of 4

June 16, 2025

Cost: Please inform the ACLU-MS in writing (email, mail, or fax) in advance of production if you expect that the costs of production will exceed \$100. Please also provide an itemized list of the costs and fees.

If there are any questions related to this request, please do not hesitate to email the ACLU-MS at ahill1@aclu-ms.org or call (601) 354-3408. Thank you in advance for your assistance.

Sincerely,



Ayanna Hill
ACLU of Mississippi
P.O. Box 2242
Jackson, MS 39225
F: 601-355-6465
ahill1@aclu-ms.org



D. Korbin Felder
Center for Constitutional Rights
P.O. Box 12046
Jackson, MS 39236

Exhibit B



OFFICE OF THE DISTRICT ATTORNEY

JOHN K. BRAMLETT, JR.
DISTRICT ATTORNEY

TWENTIETH JUDICIAL DISTRICT
RANKIN, MADISON COUNTIES

June 27, 2025

Delivered via electronic mail

Ms. Ayanna Hill

ahill1@aclu-ms.org

D. Korbin Felder

kfelder@ccrjustice.org

Re: Information request from ACLU

Dear Ms. Hill and Mr. Felder:

We are in receipt of your email regarding a request for information, titled a public records request. This request was submitted on behalf of the ACLU of Mississippi and the Center for Constitutional Rights.

You referenced a statement given by District Attorney Bubba Bramlett to Jerry Mitchell on February 15, 2024. We stand by that statement, here is that statement in its entirety:

I would like to take this opportunity to reiterate our condemnation of the actions of the six former law enforcement officers in Rankin County who violated the public trust and shook the foundation of our justice system. The felony crimes committed by these six former officers obviously called into question the integrity of criminal cases in which any of them were involved. Upon learning of these crimes, my office immediately conducted an extensive review to identify any and all cases in

which these officers were involved. We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. As a result, my office moved to dismiss those indicted cases and declined those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. This is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

Our office is familiar with the cases, *Brady v. Maryland*, 373 U.S. 83 (1963); *Giglio v. United States*, 405 U.S. 150 (1972); and *Kyles v. Whitley*, 514 U.S. 419 (1995) you cited in your letter. Our office is aware of and in compliance with our duty to provide exculpatory evidence, impeachment evidence and/or any agreements with witnesses. We will continue to be in compliance with these cases and duties.

The information you seek from this office either does not exist, is not in the Rankin County District Attorney's Office possession and/or is exempt from a public records request under the Mississippi Records Act (Section 25-61-1, et seq. of the Mississippi Code of 1972, as amended) and applicable law. More specifically, this information is exempt under Miss. Code Ann. §25-61-3(b) and (f) and/or §25-1-102. This opinion is supported by Mississippi statute, Mississippi Attorney General Opinions and case law.

Miss. Code Ann. §25-1-102 provides that records which constitute the work product of a district attorney are exempt from the Public Records Act. More specifically, it states:

Records in the possession of a public body, as defined by paragraph (a) of Section 25-61-3, which represent and constitute the work product of any attorney, district attorney or county prosecuting attorney representing a public body and which are related to litigation made by or against such public body, or in anticipation of prospective litigation, including all communications between such attorney made in the course of an attorney-client relationship, shall be exempt from the provisions of the Mississippi Public Records Act of 1983.

Miss. Code Ann. § 25-1-102.

Additionally, material which is investigative in nature, meaning information that goes beyond that of an incident report as defined in Miss. Code Ann. §25-61-3(e) are protected and not subject to disclosure. Specifically, Miss. Code Ann. §25-61-3(f) states:

(f) "Investigative report" means records of a law enforcement agency containing information beyond the scope of the matters contained in an incident report, and generally will include, but not be limited to, the following matters if beyond the scope of the matters contained in an incident report:

(i) Records that are compiled in the process of detecting and investigating any unlawful activity or alleged unlawful activity, the disclosure of which would harm the investigation which may include crime scene reports and demonstrative evidence;

- (ii) Records that would reveal the identity of informants and/or witnesses;
- (iii) Records that would prematurely release information that would impede the public body's enforcement, investigative or detection efforts;
- (iv) Records that would disclose investigatory techniques and/or results of investigative techniques;
- (v) Records that would deprive a person of a right to a fair trial or an impartial adjudication;
- (vi) Records that would endanger the life or safety of a public official or law enforcement personnel, or confidential informants or witnesses;
- (vii) Records pertaining to quality control or PEER review activities; or
- (viii) Records that would impede or jeopardize a prosecutor's ability to prosecute the alleged offense.

Miss. Code Ann. § 25-61-3.

The MS Attorney General's office opined that when a newspaper requested a district attorney's office case file and contents, that this information was exempt under the Public Records Act. The opinion specifically stated, "Criminal case files and any records related to those cases in the office of a district attorney are exempt from the Public Records Act." Carter, Mar. 2, 2001, A.G. Op. #01-0100 citing to Miss. Code Ann. 25-1-102; Miss. Code Ann. § 25-61-3 ; and Miss. Code Ann. §45-29-3. While Miss. Code Ann. §45-29-3 has been repealed, the current statute Miss. Code Ann. §25-61-3(f) provides the same protections and exemptions found in Miss. Code Ann. §45-29-3 and adds to the exemptions, records that would impede or jeopardize a prosecutor's ability to prosecute the alleged offense.

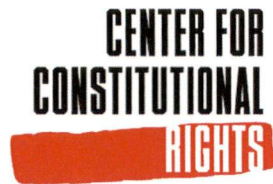
In *Wagner v. Andreacchio*, 368 So. 3d 287 (Miss. 2023), the Mississippi Supreme Court held that despite the Mississippi Attorney General's Office turning over their case file, these files are statutorily exempt under the Public Records Acts and that they need not be disclosed. See *Wagner v. Andreacchio*, 368 So. 3d 287, 290 (Miss. 2023). Miss. Code. Ann. § 25-61-12(2)(a) (Rev. 2018) (exempting investigative reports from the provisions of the Mississippi Public Records Act of 1983); Miss. Code. Ann. § 25-61-3(b) (Rev. 2018) (defining "public records" as "all . . . documentary materials . . . having been used, being in use, or prepared, possessed or retained for use in the conduct, transaction or performance of any business, transaction, work, duty or function of any public body").

Any documents related to previously indicted cases are filed with the Court and can be requested from the Rankin County Circuit Clerk's Office.

Sincerely,

Rankin County District Attorney's Office

Exhibit C



July 8, 2025

BY EMAIL TO:

knewman@rankincounty.org

mlemon@rankincounty.org

Attn: Attorney Kathryn Newman
Rankin County District Attorney
215 E Government St (2nd Floor)
Brandon, MS 39042

Re: ACLU and CCR Reply to DA's Public Records Response on June 27, 2025

Dear Assistant District Attorney Newman:

We are in receipt of the June 27, 2025 response from the District Attorney's Office to our public records request. Thank you for your written response. However, we are unable to properly evaluate the response because it only provides generalized reasoning for denying our request wholesale. We are therefore writing to request that the Rankin County District Attorney's office provide an itemized list of exemptions or reasons for denial per Miss. Code. § 25-61-5(2) and (3).

The blanket denial letter lists multiple reasons that the District Attorney's Office will not provide records without specifying which claimed exemption or other grounds of denial applies to which request. *See, e.g.,* Response at 2 ("The information you seek from this office either does not exist, is not in the Rankin County District Attorney's Office possession and/or is exempt from a public records request."). "[A] statement of the specific exemption relied upon" for the denial of each request is required by Mississippi state law. *See* Miss Code. § 25-61-5(3).

Our June 16, 2025 public records request provided an itemized list requesting six sets of records. We are requesting that the District Attorney's Office please provide a responsive itemized list which specifies, with respect to each and all parts of our request, the claimed exemptions pursuant to § 25-61-5(3), whether the records do not exist, or any other reason for each specific denial. Please include cites to each statutory exemption that you claim.

Page 2 of 2
July 8, 2025

Additionally, Mississippi state law requires that even if part of a record is exempt, the public entity still must produce the nonexempt portion of the record for examination. *See* Miss. Code § 25-61-5(2). Thus, we ask that you immediately produce all nonexempt records responsive to our request.

Thank you for your time and attention to this. We look forward to your response.

Sincerely,



Ayanna Hill
ACLU of Mississippi
P.O. Box 2242
Jackson, MS 39225
F: 601-355-6465
ahill1@aclu-ms.org



D. Korbin Felder
Center for Constitutional Rights
P.O. Box 12046
Jackson, MS 39236

Exhibit D



OFFICE OF THE DISTRICT ATTORNEY

JOHN K. BRAMLETT, JR.
DISTRICT ATTORNEY
TWENTIETH CIRCUIT COURT DISTRICT

July 22, 2025

Delivered via electronic mail only:

Ms. Ayanna Hill at ahill1@aclu-ms.org

Mr. D. Korbin Felder at kfelder@ccrjustice.org

Re: Information Request from ACLU and CCR dated July 8, 2025

Dear Ms. Hill and Mr. Felder:

We are in receipt of your emails regarding our office's public records response dated June 27, 2025. I apologize for the delay in responding to your follow-up, we are faced with resource issues specifically time and staff. Also, we were confident that our June 27 response was sufficient and comported with applicable law. Nevertheless, upon review of your concerns, we are providing this supplemental itemized response for each category of requested records.

Please note that this supplemental response incorporates every reason, explanation, and exemption set forth in our original June 27th response.

1. Case List Involving the Goon Squad Officers

After a reasonable search the DA's Office does not have a compiled case list or similar record showing the case names and docket numbers of all cases that any member of the Goon Squad has been involved in, whether by investigating or testifying, in the last four years. The DA's Office has no duty to create a new record to satisfy a records request. The underlying case files to create this list are exempt pursuant to Miss. Code Ann. § 25-1-102 and Miss. Code Ann. § 25-61-3(f)(i), (ii), (viii).

2. Policies on Disclosure of Exculpatory/Impeachment Evidence

Although the DA's office is obligated and diligently works to comply with our duty to provide exculpatory evidence, impeachment evidence and/or any agreements with witnesses, despite a reasonable search the DA's Office does not maintain a formal written policy outside existing case law and ethical obligations (e.g., *Brady*, *Giglio*, and *Kyles*).

3. Your request indicates that you are already in possession of the press statement the DA made regarding the DA's Office conducting an extensive review to identify all cases in which the six officers were involved. There was not a written policy, emails, memos, or other records. The DA's Office reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. Then, the DA's office moved to dismiss those indicted cases and declined to

prosecute those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. There was no written policy. This was just the right thing to do. The identification of cases was exhaustive and time consuming. Cases are filed by the defendant's last name not by law enforcement agency.

3. a. Records between 2022-24 of Process for Identifying Cases Affected by Goon Squad Misconduct

After a reasonable search, the DA's Office does not possess the records you seek. If these records were to exist, then they are exempt from a public records request under Miss. Code Ann. § 25-61-3(b) and (f)(i), (iii), (v), (viii) and/or § 25-1-102.

3. b. Records of Decisions to Dismiss or Resolve Cases Affected by Misconduct

Internal deliberations, memos, and any dismissal evaluations reflect legal strategy and are exempt under the attorney work product doctrine. Miss. Code Ann. § 25-1-102. Additionally, dismissal orders publicly filed during this period may be obtained through the Rankin County Circuit Court Clerk's Office.

3. c. Records Regarding Measures Taken to Deter Law Enforcement Misconduct

The DA's Office has no authority over law enforcement. Rather through prosecutorial discretion and ethical determinations the DA's Office actions are recorded in court filings or in certain situations the absence of same which could be indicative of a decision not to prosecute a matter due to misconduct of law enforcement. Any such records would be exempt; however, the resulting public court filings are found in the possession of the Circuit Court Clerk. The DA's Office claims an exemption to the extent that internal actions or communications occurred, those would include sensitive deliberations and strategic responses to criminal misconduct. Miss. Code Ann. §§ 25-1-102 and 25-61-3(f)(iii), (vi), (viii).

4. Internal Guidelines for Evaluating Plea Offers (General Policy)

The evaluation of plea offers is inherently discretionary and tailored to individual cases. After reasonable search there are no written policies or internal guidelines. If any internal notes, guidelines, or criteria regarding plea evaluations were to exist, they constitute prosecutorial strategy and work product exempt from disclosure pursuant to Miss. Code Ann. § 25-1-102. In this district the DA's sentencing recommendation becomes public records as it is filed as an exhibit to the Defendant's guilty plea petition. These documents are kept by the Rankin County Circuit Court Clerk.

5. Communications Between DA's Office and Goon Squad Members (2022–2024)

After reasonable search, no written communications in Request 5 were found to exist. If any such communications were to exist, they would constitute investigative or attorney work product records. Thus, these records are exempt under the Miss. Code Ann. §§ 25-1-102 and 25-61-3(f)(i), (ii), (iv), (vi), and (viii).

6. Communications Referring to Any Goon Squad Member (2022–2024)

This request seeks any internal or external references to individuals now identified as part of the "Goon Squad." These references, if they were to exist, are embedded within privileged prosecutorial discussions or investigatory material. Releasing them would compromise legal strategy and may identify witnesses, expose investigatory details, or otherwise impair prosecutorial effectiveness. These communications are exempt under Miss. Code Ann. §§ 25-1-102 and 25-61-3(f)(i), (ii), (iv), and (viii).

Sincerely,
Rankin County District Attorney's Office

Exhibit E



August 22, 2025

BY EMAIL TO:

knewman@rankincounty.org;
mlemon@rankincounty.org.

Rankin County District Attorney's Office
Attn: District Attorney John Bramlett, Jr. and
Assistant District Attorney Kathryn Newman
215 E Government St (2nd Floor)
Brandon, MS 39042

Re: ACLU and CCR Reply to DA's Second Public Records Response on July 22, 2025

Dear District Attorney Bramlett and Assistant District Attorney Newman:

We appreciate the supplemental response the Rankin County District Attorney's Office sent on July 22, 2025 in regard to our public records request of June 16, 2025. Thank you for the additional information and explanations you have provided. However, we remained concerned that the answers given by your office violate the Mississippi Public Records Act of 1983 ("MPRA"). Miss. Code Ann. §§ 25-61-1, *et. seq.* We therefore write in the hope of understanding whether your office will reconsider its positions or whether, instead, we are at an impasse that may have to be resolved by the Mississippi Ethics Commission or Chancery Court through civil litigation. Miss. Code Ann. § 25-61-13; Miss. Ethics Commission R. 2.10.

In response to our request, you have disclosed a total of **zero** documents. That is troubling. The Goon Squad's behavior is one of the worst scandals to hit Mississippi's justice system in recent memory. District Attorney Bramlett has reportedly acknowledged that these officers "violated the public trust and shook the foundation of our justice system."¹ The public trust and the justice system's foundation cannot be repaired, in our view, by telling Mississippians that they are not entitled to see even a single piece of paper your office has written or received concerning the Goon Squad.

¹ Jerry Mitchell, *Rankin County DA reviewing 'Goon Squad' cases*. Legal experts say that's not enough, Mississippi Today (March 11, 2024), <https://mississippitoday.org/2024/03/11/goon-squad-cases-need-independent-review-legal-experts-say/>.

This letter explains (1) the legal principles that govern our request, (2) the specific shortcomings of your office's response to each of the six numbered categories in our original request, and (3) the additional steps we believe must be undertaken to comply with the MPRA.

I. Legal Principles

The Mississippi Public Records Act makes clear that public records belong to the people unless the Act specifically exempts them from disclosure. *See* Miss. Code Ann. § 25-61-5(1)(a). It states that, subject to certain exceptions, "all public records are hereby declared to be public property." *Id.* As the Mississippi Supreme Court has held[:]

there is to be a liberal construction of the general disclosure provisions of [the MPRA], whereas a standard of strict construction is to be applied to the exceptions to disclosure [and] any doubt concerning disclosure should be resolved in favor of disclosure.

Mississippi Dep't of Wildlife, Fisheries and Parks v. Mississippi Wildlife Enforcement Officers' Ass'n, Inc., 740 So.2d 925, 936 (¶32) (Miss. 1999); *see* 73 Am.Jur.2d Statutes § 313, at 463-64 (1974).

When a public body receives a request under the MPRA, it must conduct a good-faith, reasonable search for responsive documents and produce all non-exempt portions of those documents. *See American Public Media v. Office of the District Attorney*, No. R-20-028 (Miss. Ethics Comm'n Oct. 15, 2020) ("The District Attorney's Office had a legal obligation to make a reasonable search for any responsive documents."); Miss. Code Ann. § 25-61-5(2); Mississippi Model Public Records Rule 4 cmt. 4.3(9) (Mar. 5, 2010).²

This includes public records relating to criminal justice. For example, the Attorney General's Office has opined that "criminal records for felony convictions would be considered public records and as such are subject to the Public Records Act." Letter to Lucy Carpenter re: Circuit Clerk Fees, 96-0003, at *2, Op. Miss. Att'y Gen. (Feb. 7, 1996).

The MPRA does not contain a general exemption for records held by law enforcement agencies. Thus, the default rule—that public records must be disclosed unless specifically exempted—applies fully to law enforcement. *See generally* Miss. Code Ann. § 25-61-5(1)(a).

In two respects, though, Mississippi law allows law enforcement entities to withhold documents under carefully delineated circumstances. First, public bodies, including district attorneys and prosecuting attorneys, may withhold certain records that constitute attorney work product. Miss. Code Ann. § 25-1-102. Specifically, they may withhold records "which represent and constitute the work product" of attorneys relating to or in anticipation of litigation, including "all communications between such attorney made in the course of an attorney-client relationship." *Id.*

² Mississippi Model Public Records Rules will hereinafter be cited as "Miss. Model Pub. Rec. R.".

Second, the MPRA exempts certain specified law enforcement records due to their subject matter: (1) records containing personal information about law enforcement officers and others; (2) records constituting “investigative reports”; and (3) “[p]ersonal information of victims.” Miss. Code Ann. § 25-61-12(1)-(3). In explaining the exemption for “investigative reports,” the law makes clear that “incident reports,” containing a “narrative description” of an alleged offense, do not constitute investigative reports and are thus not exempt from disclosure. *Id.* §§ 25-61-2(e), 25-61-12(2). Whether a record is an “investigative report” or an “incident report” is a question of fact, to be answered on a case by basis. *See* Letter to Mark Sorrell re: Public Records Request for Municipal Law Enforcement Records, 2010-00381, at *2, Op. Miss. Att’y Gen. (Sept. 8, 2010). But of course, if a record held by a law enforcement agency is not a “report” at all, and is not otherwise exempt from disclosure, then it must be disclosed as a public record.

Your office’s response to our request appears to rest on a sweepingly broad assertion of the work-product and investigative-report exemptions. For the reasons we explain below, we believe your office’s positions are mistaken as a matter of law.

II. The Requests

Request 1: Case List for Matters Involving Goon Squad Deputies

We requested a list or other record showing the names and docket numbers of Goon Squad cases from the last four years. Your supplemental response states that your office “does not have a compiled case list or similar record,” that it “has no duty to create a new record,” and that the underlying files are exempt as work product or investigative records. Respectfully, we disagree.

This response is not only at odds with public statements from your office³ but also statements within your July 22nd letter itself. The letter claims that your office has undertaken “an extensive review to identify all [Goon Squad] cases” and that “[t]he identification of cases was exhaustive.” It seems unlikely that your office could have completed such an exhaustive identification process without ever writing down the cases you reviewed.

But even supposing your office never wrote down the Goon Squad cases you identified, it would not follow that your office could deny our request in its entirety. That’s because the MPRA “provides broad access to public records regardless of form.” Letter to Joseph Shepard, 2011-00027, at *2, Op. Miss. Att’y Gen. (Feb. 4, 2011). So, if your office has indeed identified Goon Squad cases, it can provide copies of, or allow us to search, records in those cases. Those records would include, at a minimum, incident reports from the underlying criminal cases and documents sufficient to identify the relevant case numbers. Such records are neither your attorney work

³ *See* Jerry Mitchell, *Rankin County DA reviewing ‘Goon Squad’ cases. Legal experts say that’s not enough*, Mississippi Today (March 11, 2024), <https://mississippitoday.org/2024/03/11/goon-squad-cases-need-independent-review-legal-experts-say/> (“[M]y office immediately conducted an extensive review to identify any and all cases in which these officers were involved We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case.”).

product nor investigative records. And factual and public information such as docket numbers and case names are not exempt from disclosure.⁴

We further note that, although the MPRA generally doesn't *require* public bodies to create new documents, your office can choose to compile a list responsive to our request; that may be the least burdensome approach for your office. In fact, the Mississippi Model Public Rules on the MPRA recommend that "sometimes it is easier for a public body to create a record responsive to the request rather than collecting and making available voluminous records that contain small pieces of the information sought by the requestor or find itself in a controversy about whether the request requires the creation of a new record." Miss. Model Pub. Rec. R. 4.3(5).

Accordingly, we respectfully ask that your office produce a list or other record showing the names and docket numbers of Goon Squad cases, or a set of records sufficient to identify the relevant case numbers. If your office refuses to produce these records, we ask that you provide a summary description of each search conducted by the office including what custodians in which offices were searched, and the search methodology (search terms for electronic searches and how any manual, non-electronic searches were conducted). *See* Miss. Model Pub. Rec. R. 4.3(9).⁵

Request 2: Policies, Memoranda, or Guidelines on Brady/Giglio Compliance

We requested all policies, memos, and internal guidelines concerning your office's obligation to disclose exculpatory and/or impeachment evidence to criminal defendants. Your supplemental response states that "the DA's Office does not maintain a formal written policy outside existing case law and ethical obligations."

Particularly given the gravity of the Goon Squad scandal, we are alarmed to learn that your office has never written a policy—or, apparently, a single memo—concerning its constitutionally-mandated disclosure obligations. Nonetheless, we accept your representation that this is the reality. If we have misunderstood your response, please let us know.

Request 3: Records Reflecting the Office's Review of Goon Squad Cases

Our request asked for "All policies, emails, memos, or other records between 2022 and 2024 reflecting actions taken by the Rankin County District Attorney's Office in response to revelations regarding the Goon Squad's misconduct." Your office's response states that either "[t]here was not a written policy, emails, memos, or other records," or the records are protected from disclosure by the attorney work product or exempt from disclosure as investigative records.

This cannot be right. We address each separate section of Request 3 below.

Request 3a: Records between 2022-24 of Process for Identifying Cases Affected by Goon Squad Misconduct

⁴ Additionally, Mississippi Public Records law allows law enforcement agencies discretion to release records. *See* Miss. Code Ann. § 25-61-12(2)(a).

⁵ [Mississippi Model Public Records Rules](#)

Your office's response:

After a reasonable search, the DA's Office does not possess the records you seek. If these records were to exist, then they are exempt from a public records request under Miss. Code Ann. § 25-61-3(b) and (f)(i), (iii), (v), (viii) and/or § 25-1-102.

This response does not make sense. Is the District Attorney's position that, faced with revelations which were so widely reported—revelations which purportedly initiated an “exhaustive and time consuming” search by your office—not one email or memo was sent? Is it the District Attorney's position that no instructions on how to review the identified cases were documented?

As an initial matter, we do not understand why your office asserts bases for withholding these records “if [they] were to exist” when your letter says your office conducted a search and “does not possess the records.” Exemptions are only applicable to actual records. Your office's response regarding potentially exempt records therefore raises the possibility that there may in fact be responsive records in existence. Since your office says it conducted a “reasonable search,” we request the details of that search. *See* Miss. Model Pub. Rec. R. 4.3(9). We ask that you provide more details about what electronic and non-electronic files and/or data systems you searched, what custodians within the office were searched, who conducted the search(es), and if any search terms were used, what they were.

At a minimum, given your statement that your office's review process resulted in motions to dismiss filed in court, the public filings in those cases are responsive to our request and not conceivably covered by any exemption. We would not be able to identify the relevant public filings because your office has not provided the names and docket numbers of affected cases.

Moreover, it is doubtful that either the work-product or investigative-records exemption could apply, wholesale, to all emails, memos, and other documents produced during that review process. The incident reports in the underlying cases are, of course, not exempt. Miss. Code Ann. § 25-61-12(2). Nor are case numbers. Nor are any communications between your office and people outside your office. *See Haynes v. Anderson*, 597 So. 2d 615, 623 (Miss. 1992) (explaining that, with respect to specific documents, “[a]n attorney or client waives work product by giving the documentation to a third person.”) (McRae, J., specially concurring). For example, a news article from 2024 reports that your office sent Mississippi Today “a statement” purporting to describe your office's “extensive review to identify any and all cases in which these officers were involved.”⁶ A “statement” sent to a journalist concerning your identification process is an example of a document that is responsive to our Request 3a.

Request 3b: Records Regarding Process for Resolving Goon Squad Cases

Your office's response indicates that “dismissal orders publicly filed during this period may be obtained through the Rankin County Circuit Court Clerk's Office.” While dismissal orders

⁶ Jerry Mitchell, *Rankin County DA reviewing 'Goon Squad' cases. Legal experts say that's not enough*, Mississippi Today (March 11, 2024), <https://mississippitoday.org/2024/03/11/goon-squad-cases-need-independent-review-legal-experts-say/>

may have been entered publicly with the court, no information about when the orders were entered or a case list or the District Attorney's process in reviewing these cases have been produced. This effectively makes these cases unavailable to the public, which is in conflict with the inherent purposes of the MPRA.

Your supplemental response also makes a wholesale assertion of work product protection. That assertion is mistaken. The work product doctrine "protects an attorney's thoughts, mental impressions, strategies, and analysis from discovery by opposing counsel." *Flechas v. Pitts*, 138 So.3d 907, 911 (¶11) (Miss. 2014) (quoting *Hewes v. Langston*, 853 So.2d 1237, 1245 (Miss. 2003)) (citation omitted). Records reflecting policies and procedures, as well as concrete actions your office took to dismiss cases, applying the standards you crafted, do not necessarily involve the thoughts, mental impressions, or strategies of any attorney. See *Webster v. City of Southaven*, [R-10-008](#) (Miss. Ethics Op. Oct. 8, 2010) (public records opinion).

Request 3c: Records Regarding Measures to Deter Law Enforcement Misconduct

Your office's response:

The DA's Office has no authority over law enforcement. Rather through prosecutorial discretion and ethical determinations the DA's Office actions are recorded in court filings or in certain situations the absence of same which could be indicative of a decision not to prosecute a matter due to misconduct of law enforcement. Any such records would be exempt; however, the resulting public court filings are found in the possession of the Circuit Court Clerk. The DA's Office claims an exemption to the extent that internal actions or communications occurred, those would include sensitive deliberations and strategic responses to criminal misconduct. Miss. Code Ann. §§ 25-1-102 and 25-61-3(f)(iii), (vi), (viii).

This response is in conflict with your office's publicly available statements. First, whether or not the District Attorney's Office has "authority over law enforcement" does not mean it lacks influence over the conduct of Rankin County police. For instance, your office's public website states that District Attorney Bramlett "has lectured on various aspects of criminal law and procedure to law students, law enforcement officers and others," and "currently provide[s] criminal law instruction at the Mississippi Law Enforcement Officers Training Academy."⁷ It would therefore be likely that responsive records could exist, especially in regard to such direct training by the District Attorney. Furthermore, such records would not necessarily be exempt for the same reasons as stated above with respect to Request 3b.

Additionally, in response to this request, your office "claims an exemption to the extent that internal actions or communications occurred." This response is not proper under the MPRA. An agency cannot claim vague and sweeping exemptions for potential or non-existent records or presume to know many of those records would contain "sensitive deliberations and strategic responses to criminal misconduct." Again, either the search produced records or it did not. Assuming that the "actions or communications" did occur, we request those records, some parts

⁷ Author Unknown, *District Attorney* (John Bramlett, Jr.), Rankin County Mississippi (last viewed Aug. 20, 2025), <https://www.rankincounty.org/departments/index.php?structureid=11>.

of which may be redacted under applicable exemptions, but non-exempt portions should be separated out and produced. *See* Miss. Code Ann. § 25-61-5(2); *see also* Miss. Model Pub. Rec. R. 4.4(4)(b)(i).⁸

Request 4: Decisions to Dismiss or Otherwise Resolve Affected Cases

We requested all policies and internal guidelines regarding your office's process for evaluating plea offers or plea deals with defendants. Your supplemental response states that your office has "no written policies or internal guidelines" on the subject, and if they existed they would constitute attorney work product exempt from disclosure under Miss. Code Ann. § 25-1-102.

Again, particularly given the gravity of the Goon Squad scandal, we are alarmed to learn that your office has never developed any written policies or guidance about making plea offers or plea deals. Nonetheless, we accept your representation that this is the reality. If we have misunderstood your response, please let us know.

Request 5: Communications with Goon Squad Members

We requested communications between your office and members of the Goon Squad between 2022 and 2024. Your office states that no such communications exist, and that if they existed they would be exempt as attorney work product or investigative reports.

That is hard to accept. Given that members of the Goon Squad were still employed with the Sheriff's Department during this time, and regularly working on criminal cases, we fail to understand how your office could have had no preserved communications with them. Nor do we understand how any such communications could be attorney work product; your office's attorneys did not, so far as we know, represent members of the Goon Squad, and any communications between your office and members of the Goon Squad would constitute communications with third parties.

Our records request defined "records" as all records "preserved in electronic or written form." While your response notes you searched "written communications," it does not say whether you reviewed voicemails or other electronic non-written communications that may be responsive to our request. Under the law, text messages, direct messages and other related communications from personal devices are also responsive records. *See NE Miss. Daily Journal v. City of Tupelo*, [R-13-023](#) (Miss. Ethics Comm'n Apr. 11, 2014) (public records opinion) ("Any text message used

⁸ If a portion of a record is exempt from disclosure, but the remainder is not, a public body generally is required to redact (black out) the exempt portion and then provide the remainder. Withholding an entire record where only a portion of it is exempt violates the act. Some records are almost entirely exempt but small portions remain nonexempt. For example, information contained in a police report revealing the identity of a crime victim is exempt from disclosure. If someone requested a police incident report which contains information that would reveal the identity of the victim, the public body must redact the victim's identifying information but provide the rest of the report.

Hendrix v. City of Jackson, [R-08-002](#) (Miss. Ethics Op. Sept. 12, 2008) (citing Miss. Code Ann. §§ 25-61-5(2), 25-61-12(2)(d)).

by a government official “in the conduct, transaction or performance of any business, transaction, work, duty or function of [the government]” is a public record, regardless of where the record is stored.”).

We therefore respectfully request that your office either conduct a new search for all types of applicable and responsive records or provide a summary description related to all searches conducted related to Request 5, including: what custodians in which offices were searched, and the search methodology (search terms for electronic searches and how any manual, non-electronic searches were conducted). *See* Miss. Model Pub. Rec. R. 4.3(9).

Request 6: Communications about Goon Squad Members

We requested communications to or from your office between 2022 and 2024 referring to any member of the Goon Squad. Your supplemental response does not dispute that such communications exist. But it declines to produce any of them, based on a blanket claim that they are all exempt. Respectfully, this response is plainly unacceptable under Mississippi law.

It is not conceivably correct that all correspondence to and from your office concerning the Goon Squad, from 2022 to 2024, is exempt from disclosure. Your supplemental response appears to recognize this reality by asserting that the records you are withholding are “embedded within” privileged discussions. But a record “embedded within” a privileged discussion is not necessarily privileged, and non-exempt portions of records must be produced. *See* Miss. Code Ann. § 25-61-5(2). For example, if someone sent your office a description of misconduct committed by members of the Goon Squad, you cannot cloak that record in privilege simply by engaging in privileged discussions about it. Please, therefore, produce these records; your office can redact privileged or exempted records as appropriate. *Cf. Colbert v. Colbert*, 403 So. 3d 729, 737 (¶42) (Miss. Ct. App. 2025) (explaining that “the mere ‘fact that a few specific filings may contain privileged or confidential information does not warrant sealing the entire case from public view,’ and that ‘specific documents can be redacted or filed under seal as necessary’” (quoting *Fulgham v. Morgan & Morgan PLLC*, 363 So. 3d 980, 988 (¶24) (Miss. Ct. App. 2019))); *see e.g.*, Miss. Const. art. 3, § 24.

We are especially concerned that your office has not even disclosed any material received from or sent to third parties. Those records cannot contain confidential mental impressions of your office’s attorneys. Nor could they be sensitive investigative reports. Your office did not prosecute the members of the Goon Squad. It purports to have stopped using the members of the Goon Squad to prosecute criminal cases. It is therefore unclear how your office could claim that all records concerning these officers are subject to a blanket exemption of some kind.

Furthermore, as we cited to in our records request, public reporting suggests that your office was not only aware of illegal acts being committed by Goon Squad officers as early as 2022 but had “demanded” that warrantless home raids stop.⁹

⁹ Jerry Mitchell, Brian Howey, and Nate Rosenfield, *Ex-Deputy Describes Rampant Violence by Mississippi ‘Goon Squad’*, N.Y. Times (Feb. 21, 2025) (last updated July 10, 2025) (“He said deputies were entering homes without warrants so often that in 2022 a senior detective warned him that

If your office's position remains that the entirety of these communications is exempt, then we request a detailed and specific list of the exemptions applied to each separate communication—including all types of communications as referenced in our records request (such as text messages, emails, voicemails, social media messages, etc.).

III. Requested Corrective Action

The MPRA does not contain a blanket exemption allowing District Attorneys to withhold all records about or concerning law enforcement officers. If that is true for officers who do not commit misconduct, then it must also be true for officers who do. Yet, in effect, your response to our public records request amounts to a claim that, *because* sheriff's deputies who worked with your office confessed to egregious misconduct, every record of your office's response must be shielded from public view.

On this view, the more misconduct a law enforcement officer commits, the less the public gets to know about your office's response. We disagree with that view.

We respectfully request that your office (1) conduct a good-faith search to address the apparent omissions discussed above, and (2) reconsider its asserted exemptions. We recognize, however, that our offices may simply disagree with each other as to the governing law. If that is the case, please understand that we may have to proceed with a complaint to the Ethics Commission and/or a MPRA lawsuit.

The ACLU of Mississippi and the Center for Constitutional Rights are committed to a constructive dialogue and to ensuring that justice is served for everyone harmed by the Goon Squad's misconduct. We look forward to your prompt attention to this matter and are available to discuss any questions you may have. But we cannot agree that, in the wake of the Goon Squad's misconduct, the people of Rankin County and the State of Mississippi are not entitled to even a single relevant document in your office's possession.

Thank you for your time and attention to this matter.

Sincerely,

/s/: D. Korbin Felder
Justice Fellow – Staff Attorney
Center for Constitutional Rights

Ayanna Hill
Racial Justice Staff Attorney
American Civil Liberties Union of Mississippi

prosecutors in the district attorney's office had noticed and demanded they stop . . . Mr. Dedmon said it was Mr. McAlpin who passed on a warning from a prosecutor in the district attorney's office . . .").

Exhibit F



OFFICE OF THE DISTRICT ATTORNEY

JOHN K. BRAMLETT, JR.
DISTRICT ATTORNEY

TWENTIETH JUDICIAL DISTRICT
RANKIN, MADISON COUNTIES

September 9, 2025

Delivered via electronic mail

Ms. Ayanna Hill

ahill1@aclu-ms.org

D. Korbin Felder

kfelder@ccrjustice.org

Re: Information request from ACLU

Dear Ms. Hill and Mr. Felder:

We are in receipt of your letter of August 22, 2025. Our office stands by our responses on June 27, 2025, and July 22, 2025, and the case law and/or opinions cited therein.

With regards to request 6 for "communications to or from the Rankin District Attorney's Office between 2022 and 2024, inclusive, referring to any member of the Goon Squad," you are already in receipt of our responsive statement to Jerry Mitchell. I was able to find the complete chain of emails responsive to your request in which Jerry Mitchell mentions the Goon Squad. These are the only responsive documents to your requests. See Bate Stamps ACLU Response No. 1-14 attached hereto.

Furthermore, simply because someone says something in "public reporting" does not make it true. Your letter cites to an article which relied upon the word of Christian Dedmon, a convicted felon who committed heinous crimes including crimes of dishonesty, that Brett McAlphin, another convicted felon, who committed heinous crimes including crimes of dishonesty, told him something about entering homes without warrants. Then

you allege that our office knew as early as 2022 that he and others were performing illegal acts. This is not factual or truthful. As such, there are no responsive records.

As previously pointed out, with regards to requests 1, 2, 3, 4, 5 and 6 our office is not required to create a record that does not exist. See Mississippi Model Public Records Rules 4.4(4)(a); *Scruggs v. Caldwell*, 970 So. 2d 1298, 1299 (Miss. App. 2007); *Marshall v. Office of the District Attorney, 10th Circuit Court District*; Public Records Case No. R-19-049, Miss. Atty Gen. Opinion No. 2011-00027, Shepard (Feb. 4, 2011).

Additionally, as previously pointed out, our office does not have a “case list or similar record showing the case names and docket numbers of all cases that any member of the Goon Squad has been involved in, whether by investigating or testifying, in the last four years.”

Should you request for “similar records” be attempting to include our criminal case files rather than a list of cases which doesn’t exist, our files are criminal investigative files and any records related to those cases in our office are exempt from the Public Records Act. See Miss. Atty Gen. Opinions No. 2008-00142, 2001-0100, 2008-0130 and 2008-00112, Martin (June 6, 2008); *Jones v. Office of the District Attorney, 19th Circuit Court District*, Public Records Case No. R-19-004; *Clanton v. Office of the District Attorney, Eight Circuit Court District*, Public Records Case No. R-24-030.

This exemption applies whether a case was indicted or not. See *Jones v. Office of the District Attorney, 19th Circuit Court District*, Public Records Case R-14-00; *Cerniglia v. Mississippi Bureau of Investigation*; Public Records Case No. R-19-011.

Should your office seek court records, those are available both through the public access terminals in the Rankin County Circuit Clerk’s Office and remotely through the court’s electronic case management system. Our office is not required to search, review, duplicate and transmit records that are already open for inspection and copying. See *Roche and Roche vs. Harrison County*; Public Records Case R-24-024 citing *Fitzgerald v. Forrest County Circuit Court Clerk*, Public Records Case No. R-14-037 and *Lawson v. Smith County Chancery Clerk*, Public Records Case No. R-15-031 and Public Records Opinion R-09-007.

Sincerely,

Office of the District Attorney of the Twentieth
Circuit Court District

Kathryn Newman

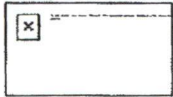
From: Jerry Mitchell <jerry.mitchell@mississippicir.org>
Sent: Wednesday, January 17, 2024 9:46 AM
To: Kathryn Newman
Subject: Press request ...

Has the district attorney's office made a decision yet with regard to the review of the cases handled by members of the Goon Squad?

If so, what is that decision?

--

Jerry Mitchell
Mississippi Center for Investigative Reporting
Jerry.Mitchell@MississippiCIR.org



Kathryn Newman

From: Kathryn Newman
Sent: Thursday, February 15, 2024 4:39 PM
To: Jerry Mitchell
Subject: Re: Question ...

You're welcome
Sent from my iPhone

On Feb 15, 2024, at 4:37 PM, Jerry Mitchell <jerry.mitchell@mississippicir.org> wrote:

Thanks very much!

On Thu, Feb 15, 2024 at 4:28 PM Kathryn Newman <knewman@rankincounty.org> wrote:

Jerry:

Please see the response below from Bubba:

I would like to take this opportunity to reiterate our condemnation of the actions of the six former law enforcement officers in Rankin County who violated the public trust and shook the foundation of our justice system. The felony crimes committed by these six former officers obviously called into question the integrity of criminal cases in which any of them were involved. Upon learning of these crimes, my office immediately conducted an extensive review to identify any and all cases in which these officers were involved. We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. As a result, my office moved to dismiss those indicted cases and declined those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. This is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

Thanks,

Kathryn White Newman

Assistant District Attorney

Twentieth Judicial District Attorney's Office

P. O. Box 68

Brandon, MS 39043

601-824-2555

From: Jerry Mitchell <jerry.mitchell@mississippicir.org>

Sent: Wednesday, February 14, 2024 2:40 PM

To: Kathryn Newman <knewman@rankincounty.org>

Subject: Question ...

I understand the DA's office is reviewing some of the cases involving Goon Squad members.

How far back is that review going?

Have you found any cases yet that need to be dismissed?

Thanks very much,

Jerry

--

Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org

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--

Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org



Kathryn Newman

From: Jerry Mitchell <jerry.mitchell@mississippicir.org>
Sent: Friday, February 16, 2024 7:54 AM
To: Kathryn Newman
Subject: Re: Question ...

Few followup questions:

How far back in time have y'all gone so far in looking at cases? How much further back do you plan to go?

How many cases have been dismissed so far? Do you happen to have the names of those whose indictments were dismissed?

Thanks very much,
Jerry

On Thu, Feb 15, 2024 at 4:28 PM Kathryn Newman <knewman@rankincounty.org> wrote:

Jerry:

Please see the response below from Bubba:

I would like to take this opportunity to reiterate our condemnation of the actions of the six former law enforcement officers in Rankin County who violated the public trust and shook the foundation of our justice system. The felony crimes committed by these six former officers obviously called into question the integrity of criminal cases in which any of them were involved. Upon learning of these crimes, my office immediately conducted an extensive review to identify any and all cases in which these officers were involved. We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. As a result, my office moved to dismiss those indicted cases and declined those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. This is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

Thanks,

Kathryn White Newman

Assistant District Attorney

Twentieth Judicial District Attorney's Office

P. O. Box 68

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Sent: Wednesday, February 14, 2024 2:40 PM

To: Kathryn Newman <knewman@rankincounty.org>

Subject: Question ...

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Thanks very much,

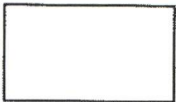
Jerry

--

Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org



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--

Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org



Kathryn Newman

From: Jerry Mitchell <jerry.mitchell@mississippicir.org>
Sent: Tuesday, February 20, 2024 1:55 PM
To: Kathryn Newman
Subject: Re: Question ...

Should I expect an answer on my follow-up questions?

Or should I take it that DA's office is declining to answer these questions?

On Thu, Feb 15, 2024 at 4:28 PM Kathryn Newman <knewman@rankincounty.org> wrote:

Jerry:

Please see the response below from Bubba:

I would like to take this opportunity to reiterate our condemnation of the actions of the six former law enforcement officers in Rankin County who violated the public trust and shook the foundation of our justice system. The felony crimes committed by these six former officers obviously called into question the integrity of criminal cases in which any of them were involved. Upon learning of these crimes, my office immediately conducted an extensive review to identify any and all cases in which these officers were involved. We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. As a result, my office moved to dismiss those indicted cases and declined those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. This is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

Thanks,

Kathryn White Newman

Assistant District Attorney

Twentieth Judicial District Attorney's Office

P. O. Box 68

Brandon, MS 39043

601-824-2555

From: Jerry Mitchell <jerry.mitchell@mississippicir.org>
Sent: Wednesday, February 14, 2024 2:40 PM
To: Kathryn Newman <knewman@rankincounty.org>
Subject: Question ...

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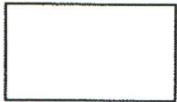
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Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org



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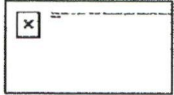
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--

Jerry Mitchell

Mississippi Center for Investigative Reporting

Jerry.Mitchell@MississippiCIR.org



Kathryn Newman

From: Kathryn Newman
Sent: Wednesday, July 17, 2024 3:27 PM
To: Jerry Mitchell
Subject: RE: Question ...

Jerry:

As stated in our February response, this is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

Kathryn White Newman
Assistant District Attorney
Twentieth Judicial District Attorney's Office
P. O. Box 68
Brandon, MS 39043
601-824-2555

From: Jerry Mitchell <jerry.mitchell@mississippicir.org>
Sent: Tuesday, July 16, 2024 8:23 PM
To: Kathryn Newman <knewman@rankincounty.org>
Subject: Re: Question ...

I understand your office has finished its review of cases involving Goon Squad members. All I need to know right now is when your office finished its review.

It's for a story I'm finishing.

On Tue, Jun 11, 2024 at 11:27 AM Jerry Mitchell <jerry.mitchell@mississippicir.org> wrote:

Can you confirm your review of the Goon Squad cases is done?

On Wed, Jun 5, 2024 at 4:02 PM Jerry Mitchell <jerry.mitchell@mississippicir.org> wrote:

We understand your office is done now in terms of a review of these cases involving Goon Squad members.

How many cases total were dismissed?

On Thu, Feb 15, 2024 at 4:28 PM Kathryn Newman <knewman@rankincounty.org> wrote:

Jerry:

Please see the response below from Bubba:

I would like to take this opportunity to reiterate our condemnation of the actions of the six former law enforcement officers in Rankin County who violated the public trust and shook the foundation of our justice system. The felony crimes committed by these six former officers obviously called into question the integrity of criminal cases in which any of them were involved. Upon learning of these crimes, my office immediately conducted an extensive review to identify any and all cases in which these officers were involved. We then reviewed each of those identified cases to determine if their testimony would be essential in the prosecution of that case. As a result, my office moved to dismiss those indicted cases and declined those cases which were not yet indicted, wherein the integrity of the investigation may have been compromised. This is an ongoing process in which we will continue to review and identify cases involving those officers and act accordingly.

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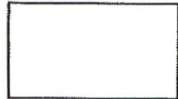
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Jerry Mitchell

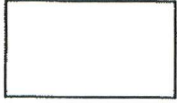
Mississippi Center for Investigative Reporting

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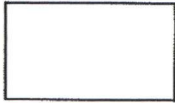


Exhibit G

IN THE CHANCERY COURT OF RANKIN COUNTY, MISSISSIPPI
TWENTIETH JUDICIAL DISTRICT

AMERICAN CIVIL LIBERTIES UNION OF
MISSISSIPPI and CENTER FOR
CONSTITUTIONAL RIGHTS,

Plaintiffs,

vs.

RANKIN COUNTY DISTRICT
ATTORNEY'S OFFICE,

Defendant.

Civil Action No. _____

DECLARATION OF RONALD SHINSTOCK

I, Ronald Shinstock, hereby declare under the penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am 51 years old and in the custody of the Mississippi Department of Corrections. I am presently incarcerated at the East Mississippi Correctional Facility.
2. I am serving a 40-year sentence following my conviction, at a one-day trial in May 2016, for Sale of Methamphetamine.
3. The events leading to my conviction occurred on March 14, 2015, when I was arrested by sheriff's deputies with the Rankin County Sheriff's Department, including Brett McAlpin.
4. At first, an informant working with the RCSD came to my home. According to the prosecution he gave me \$260 to buy methamphetamine.
5. Then, after the informant left my home, Brett McAlpin and several more RCSD deputies raided it.

6. I was never presented with a warrant of any kind, and as far as I know the deputies did not have one.
7. Two of my friends were at my home when the deputies raided it. The deputies first took my friend John outside the house.
8. The deputies later led me outside. When I got outside, I saw RCSD deputies lift John up by the nostrils with two fingers. I could see that he was beaten and there was blood coming from his ears.
9. The deputies demanded that I tell them where they could get more methamphetamine and that I need to call someone to purchase more drugs. When I told them I didn't know who to call they became physically violent.
10. Two deputies began to slap me and hit me. They instructed me to drop my pants and underwear. I complied. The officers then threatened to beat me in the genitals with a large flashlight if I did not give them the name of someone to get more drugs from.
11. The deputies also made humiliating and sexual remarks about my genitals and told me I would be raped in prison.
12. The deputies also threatened to sodomize me with the flashlight.
13. After those assaults and threats, I was led to a police car. On my way to the police car, Brett McAlpin pushed me to the ground. Because I was handcuffed, I landed face first.
14. I was indicted in 2015. The prosecution claimed that I had sold 2.28 grams of methamphetamine to the informant. Brett McAlpin, as well as the informant, later testified to this theory at trial. There was no video or audio evidence of this supposed drug sale.
15. So the case against me boiled down to the word of RCSD deputies and their informant.

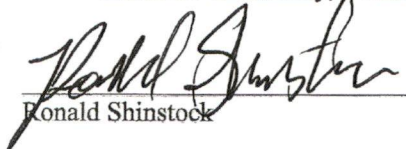
16. I retained an attorney to represent me. My attorney and I reviewed the discovery that the prosecution provided to us.
17. As far as I know, the prosecution never provided my attorney with any information in discovery about previous bad behavior by Brett McAlpin or other RCSD deputies.
18. So, even though I knew that Brett McAlpin had attacked me, threatened me, and tried to coerce me into accusing someone else of a crime in order to save myself from beatings and sexual assaults, I had to defend my case without knowing whether RCSD deputies had ever done that to anyone else, including the informant who was accusing me of a crime.
19. I went to trial on May 3, 2016. My trial lasted one day.
20. I was found guilty and sentenced to an enhanced sentence of 40 years' imprisonment.
21. I now understand that Brett McAlpin and other RCSD deputies known as the "Goon Squad" have confessed to serious and widespread misconduct. My story was covered in two *New York Times* articles entitled: *How a 'Goon Squad' of Deputies Got Away With Years of Brutality*; and *Stories of Alleged Brutality by a Mississippi Sheriff's Department*, dated November 30, 2023, and December 23, 2023, respectively.
22. If I had known that Brett McAlpin and other RCSD deputies had regularly used tactics such as beatings, abuse, torture, humiliation and even sometimes planted evidence including narcotics and "throw away" guns, I would have insisted that my defense attorney use that information at trial to impeach Brett McAlpin's testimony. I also would

have testified about how McAlpin and other RCSD deputies treated me, because I would have known that the prosecution could not have contradicted my testimony without impeachment evidence coming in at trial.

23. Since the public revelations and media coverage of the "Goon Squad" abuse and their numerous violations of the constitutional rights of people in Rankin County, as well as their subsequent convictions and sentencing, nobody from the Rankin County District Attorney's Office or the Mississippi Attorney General's Office has reached out to me about reviewing my case.

24. To this day, I do not know if the Rankin County District Attorney's office has reviewed my case for unconstitutional conduct by the arresting law enforcement officers, or regarding the integrity of my conviction.

Executed on January, 14 2026.



Ronald Shinstock