

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...")

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

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

D. Korbin Felder

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