

## **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](mailto:ahill1@aclu-ms.org)

D. Korbin Felder  
[kfelder@ccrjustice.org](mailto: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