

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