

COMMONWEALTH OF MASSACHUSETTS
BOARD OF BAR OVERSEERS
OF THE SUPREME JUDICIAL COURT



BAR COUNSEL,

Petitioner

vs.

B.B.O. File Nos. C1-20-266380 &

C1-20-266381

**JOHN E. BRADLEY, JR., ESQ. and
KAREN H. O’SULLIVAN, ESQ.,**

Respondents

PETITION FOR DISCIPLINE

1. This petition is brought pursuant to Rule 4:01, Section 8(3), of the Rules of the Supreme Judicial Court and Sections 3.13(a)(2) and 3.14 of the Rules of the Board of Bar Overseers.
2. The respondent, John E. Bradley, Jr., Esq. (“Respondent Bradley”), is an attorney duly admitted to the Bar of the Commonwealth on June 18, 1992.
3. The respondent, Karen H. O’Sullivan, Esq. (“Respondent O’Sullivan”) (together with Respondent Bradley, “Respondents”), is an attorney duly admitted to the Bar of the Commonwealth on December 17, 1997.

INTRODUCTION

4. In the early morning hours of April 17, 2003, a fire broke out in a home located at 102 Belair Street in Brockton. Mr. Yiu “Jimmy” Choy (“Mr. Choy”) and Mrs. Nu Trinh “Anne” Choy (“Mrs. Choy”), a married couple, died as a result of the fire and smoke.
5. The fire department was able to safely extract Mr. Sung Ching “Kenneth” Choy (“Kenneth” or “Kenny”) from the home. Kenneth was Mr. Choy’s grandson resulting from a

prior relationship. Kenneth's mother had sent him from Hong Kong, China to live with Mr. Choy in 2000 because she could no longer support Kenneth financially.

6. Mr. and Mrs. Choy's seventeen-year-old daughter, Frances Choy ("Frances") was also rescued from the fire.

7. Frances and Kenneth were both charged with the murders of Mr. and Mrs. Choy. Frances was also charged with arson.

8. Frances was indicted, tried three times and eventually convicted of two counts of murder and one count of arson in the Plymouth County Superior Court. She was sentenced to life in prison. Kenneth was tried and acquitted.

9. On September 17, 2020, the Honorable Linda Giles ("Judge Giles") of the Plymouth Superior Court entered an Order vacating Frances's criminal convictions after concluding that "justice may not have been done."

10. The court's decision to vacate the convictions was based in large part on prosecutorial misconduct. Respondents were the trial prosecutors.

11. On September 29, 2020, the Plymouth County District Attorney's Office ("PCDAO") entered a *nolle prosequi* effectively ending the prosecution of Frances.

12. At the time of her release at the age of thirty-four, Frances had spent nearly half of her life in prison.

**RESPONDENTS' MISCONDUCT DURING THE PROSECUTION OF
FRANCES CHOY**

Background

13. Respondent Bradley was first hired by the PCDAO in or about October 1991.

14. In or about October 2001, Respondent Bradley left the PCDAO and served as a prosecutor in the Major Crimes Unit of the United States Attorney's Office for the District of Massachusetts.

15. Respondent Bradley returned to the PCDAO in or about April 2003.

16. Throughout the 2003 to 2012 time period, Respondent Bradley served as the Deputy First Assistant District Attorney for the PCDAO. He also supervised the assistant district attorneys in the District Courts.

17. Respondent O'Sullivan was hired by the PCDAO as an assistant district attorney in or about September 1997. She was promoted to a Superior Court position in or about November 2003.

18. With respect to the fire that resulted in the deaths of Mr. and Mrs. Choy, investigators quickly concluded that it had been intentionally set. Inside Kenneth's bedroom, investigators recovered two notes written in Kenneth's handwriting on Kenneth's stationery with only Kenneth's fingerprints found on them that detailed a step-by-step plan for setting the fire.

19. When the police interrogated Kenneth on the evening of the fire, he denied having any knowledge of its origin. When the police confronted Kenneth with the handwritten notes, he admitted writing them, but stated that a fellow student had told him to write the notes to prevent bad luck. When he was unable to name the student and the police told him that his story was not credible, Kenneth implicated Frances as the mastermind of the plan to set the house on fire.

20. On June 13, 2003, Frances was indicted on two counts of murder and one count of arson of a dwelling house, while Kenneth was separately indicted on two counts of murder.

21. Respondents were the co-prosecutors in Frances's and Kenneth's criminal cases.

22. Frances's criminal case was tried separately from Kenneth's criminal case.

23. On January 14, 2008, the first criminal trial against Frances commenced. After the jury was unable to reach a verdict, the first trial ended in a mistrial on January 24, 2008.

24. On January 28, 2008, the first criminal trial against Kenneth commenced. On February 1, 2008, the jury acquitted Kenneth. Attorney Robert Galibois ("Galibois") was Kenneth's defense counsel.

25. On April 8, 2008, Kenneth was granted immunity to testify against Frances.

26. Respondents recognized that Kenneth was their single most important witness against Frances.

27. Respondents recognized that Kenneth's credibility and motives were important issues in the case against Frances.

28. On January 25, 2011, the second criminal trial against Frances commenced. Kenneth testified against Frances. After the jury was unable to reach a verdict, the second trial ended in a mistrial on February 11, 2011.

29. On Friday, April 29, 2011, Kenneth, who was facing unrelated criminal charges, fled to Hong Kong, China.

30. On Monday, May 2, 2011, the third criminal trial against Frances commenced. Judge Giles presided over the trial.

31. On May 16, 2011, Frances was found guilty of two counts of murder and one count of arson. She was then sentenced to life in prison without the possibility of parole.

32. Attorney Joseph Krowski, Sr. (“Krowski”) was Frances’s defense counsel throughout her three criminal trials.

Respondents’ Failure To Disclose Potentially Exculpatory Evidence

33. On or about January 9, 2003, Kenneth ran away from home after Mr. Choy learned that Kenneth was selling illegal drugs.

34. On or about January 11, 2003, Mr. Choy contacted the Brockton Police Department and informed the police that Kenneth was selling illegal drugs and had run away from home.

35. The Brockton Police Department created a Missing Person Report dated January 11, 2003 (“the Missing Person Report”), which evidenced that Mr. Choy had informed the police that Kenneth was selling illegal drugs and refused to come back home.

36. A computer-aided dispatch or “CAD” system report dated January 11, 2003 (“the CAD Report”) also evidenced that Mr. Choy had informed the police that Kenneth was selling illegal drugs and had run away from home.

37. The Missing Person Report and the CAD Report constituted potentially exculpatory evidence in Frances’s criminal case.

38. Respondents knew about and were in possession of the Missing Person Report and the CAD Report prior to Frances’s first criminal trial in January 2008.

39. Respondents had an obligation to disclose the Missing Person Report and the CAD Report to Krowski, Frances’s defense counsel.

40. Respondents did not disclose the Missing Person Report or the CAD Report to Krowski, Frances’s defense counsel.

Respondents' Racially Offensive, Derogatory and Unprofessional Emails

41. While actively prosecuting Frances for murders and arson, Respondents exchanged racially offensive, derogatory and unprofessional emails, as described more fully below.

42. The respondents mocked and disparaged Kenneth by comparing him to the Asian male caricature "Long Duk Dong" from the 1980s movie *Sixteen Candles*.

43. For example, at approximately 12:28 p.m., on Wednesday, June 25, 2008, Respondent O'Sullivan sent an email to Respondent Bradley concerning Kenneth in which she stated, "This is the image I am getting..." Attached to Respondent O'Sullivan's email was a picture of the Long Duk Dong character with his head laying on the chest of a tall woman. A true and accurate copy of the email and its attachment are attached hereto as Exhibit 1.

44. At approximately 4:30 p.m. on Tuesday, July 8, 2008, Respondent O'Sullivan sent an email to Respondent Bradley stating, "clothing Kenny left in lockup..." Attached to Respondent O'Sullivan's July 8, 2008 email was the image of a T-shirt with a picture of the Long Duk Dong character and the words "No more yankie my wankie!" A true and accurate copy of the email and its attachment are attached hereto as Exhibit 2.

45. At approximately 3:36 p.m. on Monday, July 14, 2008, Respondent Bradley sent an email to Respondent O'Sullivan with the subject line, "Don't know if you caught this....." The text of Respondent Bradley's email stated, "but Galibois was in the office earlier dressed like Johnny Cash."

46. At approximately 3:52 p.m. on Monday, July 14, 2008, Respondent O'Sullivan responded to Respondent Bradley's July 14, 2008 email by stating, "This will never get old to me..." Attached to Respondent O'Sullivan's email was a picture of Johnny Cash and a picture

of the Long Duk Dong character. True and accurate copies of Respondents' July 14, 2008 emails and the attachments are attached hereto as Exhibit 3.

47. At approximately 11:13 a.m. on Monday, August 4, 2008, Respondent Bradley sent an email to Respondent O'Sullivan with the subject line, "Latest on Kenny".

48. The text of Respondent Bradley's August 4, 2008 email stated the following:

"Galibois informs me today that Kenny's latest idea is to defend democracy by joining the army. While I don't see how this is possible because: 1) he is not a citizen; and 2) he was charged with murder x2, Galibois insists that Kenny has cleared a hurdle or two in the application process. As coincidence would have it, I stumbled upon '16 Candles' on cable last night. After seeing it again, I came to two conclusions: 1) Long Duc Dong should be a role model for Kenny; and 2) Jake Ryan looked about 35 years old while supposedly in high school."

49. At approximately 4:53 p.m. on Monday, August 4, 2008, Respondent O'Sullivan responded to Respondent Bradley's August 4, 2008, email by stating the following:

"Too funny! Well if there is ever a sequel to 16 candles, Kenny should try out for the role of Long Duc Dong! You are clearly just jealous of how hunky Jake Ryan was in that film which is why you feel the need to disparage him...And admit it, you probably watched the whole movie!"

50. True and accurate copies of Respondents' August 4, 2008 emails are attached hereto as Exhibit 4.

51. At approximately 11:53 a.m. on Thursday, June 25, 2009, Respondent O'Sullivan sent an email to Respondent Bradley with the subject line, "More babies". The text of Respondent O'Sullivan's email stated the following:

"You will be happy to know that Kenny Choy is having a baby! No details yet, Galibois didn't know anything about it. Kenny told Eric Clark the other day when he was in court. Unfortunately there won't be anymore Kenny sightings this week, apparently someone in his new family is ill."

52. At approximately 2:13 p.m. on Thursday, June 25, 2009, Respondent Bradley responded to Respondent O’Sullivan’s June 25, 2009, email by asking her, “Any word on who the lucky mom is?”

53. At approximately 3:00 p.m. on Thursday, June 25, 2009, Respondent O’Sullivan responded to Respondent Bradley’s June 25, 2009, reply email by stating, “Frances”.

54. True and accurate copies of Respondents’ June 25, 2009, emails are attached hereto as Exhibit 5.

55. At approximately 12:31 p.m. on Wednesday, September 9, 2009, Respondent Bradley sent an email to Respondent O’Sullivan with the subject line, “Choy”. The text of Respondent Bradley’s email stated, “just got a call from Jane Lewis at SJC...my first thought was that she was going to say that we were off the list, but instead she told me that we have been bumped up to #1...we’ll see if Krowski is on time. Can you text Galibois and let him know?”

56. At approximately 4:47 p.m. on September 9, 2009, Respondent O’Sullivan responded to Respondent Bradley’s September 9, 2009, email by stating the following:

“You will be happy to know that me and Galibois are back on! We talked today for the first time in weeks (he is still a very creepy dude). We had a case on today, and of course the ice breaker was Kenny Choy. I think he is feeling nervous that you won’t use Kenny after all and he will be out of the lime light. I haven’t looked to see what # my case is on in the Appeals court, I hope they are not at the same time. I will show up tomorrow wearing a cheongsam and will be the one doing origami in the back of the court room. My guess is that there is no way Krowski will make it there for case #1.”

57. True and accurate copies of Respondents’ September 9, 2009, emails are attached hereto as Exhibit 6.

58. At approximately 11:58 a.m. on Wednesday, September 30, 2009, Respondent O’Sullivan sent an email to Respondent Bradley with a picture of Frances superimposed on a

photograph of a burning house with the text, “GIRL SCOUTS Maybe next time you’ll buy the fucking cookies.”

59. At approximately 12:03 p.m. on Wednesday, September 30, 2009, Respondent Bradley responded to Respondent O’Sullivan’s September 30, 2009, email by stating, “Wow....that could be Frances, looks just like her.”

60. At approximately 12:04 p.m. on Wednesday, September 30, 2009, Respondent O’Sullivan responded to Respondent Bradley’s September 30, 2009, reply email by stating, “are you joking? That is frances... a little cut and paste.”

61. True and accurate copies of Respondents’ September 30, 2009, emails and the attachment are attached hereto as Exhibit 7.

62. Respondents sent and received all of the emails referenced above during their work hours as assistant district attorneys.

63. Respondents used their work computers that the Commonwealth issued to them as assistant district attorneys to send and receive all of the emails referenced above.

64. Respondents used their work email addresses that the Commonwealth issued to them as assistant district attorneys to send and receive all of the emails referenced above.

Misstating Evidence

65. On July 30, 2009, after he had been granted immunity to testify against Frances and before Frances’s second criminal trial, Kenneth was arrested and charged with the distribution of heroin in a school zone. *See Commonwealth v. Kenneth Choy*, No. 0915-CR-005017 (Brockton Dist. Ct.).

66. Respondent Bradley was the supervisor of the assistant district attorney who was prosecuting the drug and school zone case against Kenneth.

67. On April 30, 2010, Respondent Bradley emailed his subordinate and asked about the status of the drug and school zone case against Kenneth.

68. On May 3, 2010, Respondent Bradley's subordinate responded and informed him that, *inter alia*, defense counsel would be filing a motion to dismiss the school zone charge.

69. On or about November 24, 2010, the Brockton District Court dismissed the school zone charge against Kenneth. The Commonwealth did not file an opposition to defense counsel's motion to dismiss.

70. Prior to Frances's second criminal trial in 2011, Respondent Bradley knew that the court had dismissed the school zone charge against Kenneth.

71. On May 12, 2011, during his closing argument to the jury in Frances's third criminal trial, Respondent Bradley stated as follows:

"Now, you heard, ladies and gentlemen, that Kenny Choy testified pursuant to a grant of immunity. You heard that he has a pending criminal charge of distribution of heroin in a school zone. Those are things you are absolutely entitled to consider in evaluating his credibility. And by all means, you should put his testimony under a microscope. But also consider this. Kenny Choy wasn't given a free pass in exchange for his testimony in this case."

The Effect Of Respondents' Misconduct On The Administration Of Justice

72. Respondents' prosecutorial misconduct, as described above, was prejudicial to the administration of justice in Frances's criminal case.

73. Respondents' prosecutorial misconduct caused the court to vacate Frances's criminal convictions.

74. In January 2020, Frances filed with the Plymouth County Superior Court a Motion for Post-Conviction Relief and a Superseding Motion for Post-Conviction Relief.

75. On September 17, 2020, Judge Giles set forth her ruling on Frances’s post-conviction motion. *See Commonwealth v. Frances Choy*, No. 0383-CR-00300, *Memorandum of Decision and Order on Defendant Frances Choy’s Motion for Postconviction Relief*, dated September 17, 2020 (“Memo and Order”) (Plymouth Sup. Ct.).

76. Respondents’ racially offensive, derogatory and unprofessional emails, as described above, formed a basis for the court’s decision to vacate Frances’s criminal convictions.

77. In vacating Frances’s criminal convictions, the court held that, “[b]ased upon the full trial proceedings, and the nature and content of the trial prosecutors’ emails, the Court agrees with the parties that justice may not have been done and the convictions must be vacated.” *Memo and Order*, pp. 16-17.

78. In vacating Frances’s criminal convictions, the court opined as follows:

“If this Court were aware of the trial prosecutors’ emails and images demonstrating their anti-Asian bias against the Defendant, her family, and all Asian-Americans, this Court would have declared a mistrial and directed that those Assistant District Attorneys be removed from the case and that District Attorney Cruz be made aware of their racially and sexually degrading emails.”

Memo and Order, pg. 16.

79. Respondents’ failure to disclose potentially exculpatory evidence, as described above, formed a basis for the court’s decision to vacate Frances’s criminal convictions.

80. In vacating Frances’s criminal convictions, the court reasoned as follows:

“These documents [*i.e.*, the Missing Person Report and the CAD Report] indicating that Kenneth Choy ran away from home over a dispute with his grandfather over Kenneth’s drug dealing and that Jimmy Choy reported Kenneth’s drug dealing to the Brockton Police are exculpatory evidence that could have been used to show Kenneth Choy had a motive to commit the crimes and to impeach a key Commonwealth witness.”

Memo and Order, pg. 37.

81. In vacating Frances’s criminal convictions, the court found that “[n]either of the prosecuting attorneys provided this discovery to defense counsel.” Memo and Order, pg. 38.

82. In vacating Frances’s criminal convictions, the court reasoned that the “failure to disclose exculpatory evidence further supports the Court’s conclusion that justice may not have been done.” *Id.* at 38-39.

83. Respondent Bradley’s misstatement of evidence during his closing argument, as described above, formed a basis for the court’s decision to vacate Frances’s criminal convictions.

84. In vacating Frances’s criminal convictions, the court found that “ADA Bradley also argued in closing that the jury should credit Kenneth’s immunized testimony because he still had charges pending against him for possessing a Class A substance in a school zone, a factual assertion that ADA Bradley knew or should have known to be false.” Memo and Order, pg. 40.

85. The court held that Respondent Bradley’s misstatement of evidence was a contributing factor that convinced the court that justice may not have been done in Frances’s criminal case. *See* Memo and Order, pp. 44-45.

The Effect Of Respondents’ Misconduct On The Public’s Perception Of The Bar And Our Legal System

86. Respondents’ prosecutorial misconduct, as described above, became the subject of widespread and intense notoriety.

87. News of Respondents’ prosecutorial misconduct was reported locally, nationally and internationally. *See, e.g.,* Deborah Becker, *After Discovery of Prosecutors’ Racist Emails, Plymouth DA Will Not Seek New Trial For Woman Over Parents Death*, WBUR (Sept. 29, 2020); Michael Levenson, *Judge Overturns Murder Conviction, Citing ‘Racial Animus’ In Prosecutors’ Emails*, New York Times (Oct. 4, 2020); Harriet Sokmensuer, *Asian-American Woman Jailed For Parents’ Deaths Freed After Discovery of Prosecutors’ Racist Emails*, People

Magazine (Sept. 30, 2020); Leah Simpson, *Woman, 34, Who Spent 17 Years In Prison After Being Wrongfully Convicted Of Murdering Her Parents In A House Fire, Is First Woman of Color Exonerated In Massachusetts After Prosecutors' Racist Emails Are Revealed*, Daily Mail (Sept. 30, 2020).

88. News of Respondents' prosecutorial misconduct was the subject of law review articles. *See, e.g.*, Caitlin Ramiro, Comment, *After Atlanta: Revisiting the Legal System's Deadly Stereotypes of Asian American Women*, 29 Asian Am. L. J. 90, 116 (2022) ("As public officers, the prosecutors here projected stereotypical images onto Choy, which resulted in an unjust conviction. Choy's case represents the devastating consequences of the Dragon Lady stereotype on Asian American women who are criminal defendants.")

89. News of Respondents' prosecutorial misconduct was also discussed in books. *See, e.g.*, Valena Beety, *Manifesting Justice, Wrongly Convicted Women Reclaim Their Rights*, pp. 51-52, 82 & 279 (2022).

RESPONDENTS' VIOLATIONS OF THE RULES OF PROFESSIONAL CONDUCT

90. By failing to disclose to Frances Choy's defense counsel potentially exculpatory evidence known to them, Respondent Bradley and Respondent O'Sullivan violated Mass. R. Prof. C. 1.1, 1.3, 3.4(a), 3.4(c), 3.8(d), 8.4(c), 8.4(d) and 8.4(h).

91. By using their state-issued work computers and state-issued work email addresses as assistant district attorneys to exchange racially offensive, derogatory and unprofessional emails during work hours in the course of prosecuting an Asian-American defendant, Respondent Bradley and Respondent O'Sullivan violated Mass. R. Prof. C. 8.4(d) and 8.4(h).

92. By misstating the evidence in his closing argument to the jury, Respondent Bradley violated Mass. R. Prof. C. 3.4(e) and 8.4(d).

Disciplinary Rules

93. The Rules of Professional Conduct applicable to the respondents' conduct provide as follows:

Rule 1.1. Competence

A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness, and preparation reasonably necessary for the representation.

Rule 1.3. Diligence

A lawyer shall act with reasonable diligence and promptness in representing a client. The lawyer should represent a client zealously within the bounds of the law.

Rule 3.4. Fairness To Opposing Party and Counsel

A lawyer shall not:

- (a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy, or conceal a document or other material having potential evidentiary value. A lawyer shall not counsel or assist another person to do any such act;
- (c) knowingly disobey an obligation under the rules of a tribunal except for an open refusal based on an assertion that no valid obligation exists;
- (e) in trial, allude to any matter that the lawyer does not reasonably believe is relevant or that will not be supported by admissible evidence, assert personal knowledge of facts in issue except when testifying as a witness, or state a personal opinion as to the justness of a cause, the credibility of a witness, the culpability of a civil litigant, or the guilt or innocence of an accused;

Rule 3.8. Special Responsibilities of a Prosecutor

The prosecutor in a criminal case shall:

- (d) make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense, and, in connection with sentencing, disclose to the defense and to the tribunal all unprivileged mitigating information known to the prosecutor, except when the prosecutor is relieved of this responsibility by a protective order of the tribunal;

Rule 8.4. MISCONDUCT

It is professional misconduct for a lawyer to:

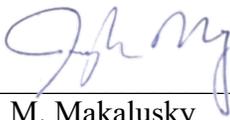
- (c) engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;
- (d) engage in conduct that is prejudicial to the administration of justice;
- (h) engage in any other conduct that adversely reflects on his or her fitness to practice law.

WHEREFORE, the Bar Counsel requests that the Board of Bar Overseers:

- a. Consider and hear the matter set forth herein;
- b. Determine that discipline of the said John E. Bradley, Jr., Esq. and Karen H. O'Sullivan, Esq, is required; and
- c. File an Information concerning these matters with the Supreme Judicial Court.

RESPECTFULLY SUBMITTED

Rodney S. Dowell
Bar Counsel

By /s/ 
Joseph M. Makalusky
Assistant Bar Counsel
99 High Street
Boston, MA 02110
(617) 728-8750

Date: June 6, 2023

EXHIBIT 1

From: OSullivan, Karen (PLY)
Sent: Wednesday, June 25, 2008 12:28 PM
To: Bradley, John (PLY)
Subject: FW: Emailing: gedde%20watanabe.jpg
Attachments: gedde%20watanabe.jpg

[This is the image I am getting...](#)

From: OSullivan, Karen (PLY) [mailto:Karen.Osullivan@state.ma.us]
Sent: Wednesday, June 25, 2008 12:23 PM
To: Ryan O'Sullivan
Subject: Emailing: gedde%20watanabe.jpg

<<gedde%20watanabe.jpg>>



R.A. 1301

C-1554

EXHIBIT 2



From: OSullivan, Karen (PLY)
Sent: Tuesday, July 8, 2008 4:30 PM
To: Bradley, John (PLY)
Subject: Emailing: DSCF2758.jpg
Attachments: DSCF2758.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

clothing Kenny left in lockup...

Bates Stamp 01543



R.A. 1299

01543

C-1552

EXHIBIT 3

From: OSullivan, Karen (PLY)
Sent: Monday, July 14, 2008 3:52 PM
To: Bradley, John (PLY)
Subject: RE: Don't know if you caught this.....
Attachments: jcash.doc

Follow Up Flag: Follow up
Flag Status: Flagged

[This will never get old to me...](#)

From: Bradley, John (PLY)
Sent: Monday, July 14, 2008 3:36 PM
To: OSullivan, Karen (PLY)
Subject: Don't know if you caught this.....

but Galibois was in the office earlier dressed like Johnny Cash.



EXHIBIT 4



From: OSullivan, Karen (PLY)
Sent: Monday, August 4, 2008 4:53 PM
To: Bradley, John (PLY)
Subject: RE: Latest on Kenny

Too funny! Well if there is ever a sequel to 16 candles, Kenny should try out for the role of Long Duc Dong! You are clearly just jealous of how hunky Jake Ryan was in that film which is why you feel the need to disparage him...And admit it, you probably watched the whole movie!

From: Bradley, John (PLY)
Sent: Monday, August 04, 2008 11:13 AM
To: OSullivan, Karen (PLY)
Subject: Latest on Kenny

Galibois informs me today that Kenny's latest idea is to defend democracy by joining the army. While I don't see how this is possible because : 1) he is not a citizen; and 2) he was charged with murder x2, Galibois insists that Kenny has cleared a hurdle or two in the application process. As coincidence would have it, I stumbled upon "16 Candles" on cable last night. After seeing it again, I came to two conclusions: 1) Long Duc Dong should be a role model for Kenny; and 2) Jake Ryan looked about 35 years old while supposedly in high school.

EXHIBIT 5



From: OSullivan, Karen (PLY)
Sent: Thursday, June 25, 2009 3:00 PM
To: Bradley, John (PLY)
Subject: RE: More babies

Frances

From: Bradley, John (PLY)
Sent: Thursday, June 25, 2009 2:13 PM
To: OSullivan, Karen (PLY)
Subject: Re: More babies

Any word on who the lucky mom is?

From: OSullivan, Karen (PLY)
To: Bradley, John (PLY)
Sent: Thu Jun 25 11:53:47 2009
Subject: More babies

You will be happy to know that Kenny Choy is having a baby! No details yet, Galibois didn't know anything about it. Kenny told Eric Clark the other day when he was in court. Unfortunately there won't be anymore Kenny sightings this week, apparently someone in his new family is ill.

EXHIBIT 6

From: OSullivan, Karen (PLY)
Sent: Wednesday, September 09, 2009 4:47 PM
To: Bradley, John (PLY)
Subject: RE: Choy

You will be happy to know that me and Galibois are back on! We talked today for the first time in weeks (he is still a very creepy dude). We had a case on today, and of course the ice breaker was Kenny Choy. I think he is feeling nervous that you won't use Kenny after all and he will be out of the lime light. I haven't looked to see what # my case is on in the Appeals court, I hope they are not at the same time. I will show up tomorrow wearing a cheongsam and will be the one doing origami in the back of the court room. My guess is that there is no way Krowski will make it there for case #1.

From: Bradley, John (PLY)
Sent: Wednesday, September 09, 2009 12:31 PM
To: OSullivan, Karen (PLY)
Subject: Choy

just got a call from Jane Lewis at SJC...my first thought was that she was going to say that we were off the list, but instead she told me that we have been bumped up to #1...we'll see if Krowski is on time. Can you text Galibois and let him know?

EXHIBIT 7

From: OSullivan, Karen (PLY)
Sent: Wednesday, September 30, 2009 12:04 PM
To: Bradley, John (PLY)
Subject: RE:

are you joking? That is frances... a little cut and paste.

From: Bradley, John (PLY)
Sent: Wednesday, September 30, 2009 12:03 PM
To: OSullivan, Karen (PLY)
Subject: RE:

Wow....that could be Frances,looks just like her.

From: OSullivan, Karen (PLY)
Sent: Wednesday, September 30, 2009 11:58 AM
To: Bradley, John (PLY)
Subject:

From: OSullivan, Karen (PLY)
Sent: Wednesday, September 30, 2009 11:58 AM
To: Bradley, John (PLY)
Attachments: image001.JPG



GIRL SCOUTS

Maybe next time you'll buy the fucking cookies