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From: [Lucy, Jack \(SUF\)](#)
To: [Dumont, David \(DOT\)](#); [Thompson, James \(DOT\)](#); [Sullivan, Brian E](#)
Subject: CW v. Wilson Martell-Lebron, 20-0384
Date: Friday, March 21, 2025 2:58:52 PM
Attachments: [Martell-Lebron, Wilson - 211 3 petition - Final.pdf](#)

Hi Guys—

I wanted to touch base before next week's trial in this case on 3/27. A few quick points:

- Please confirm that 3/27/25 still works.
- This will be a lengthy/complex trial. If schedules allow, I'd like to schedule a prep session for Tuesday or Wednesday of next week. Would that work?
- You may be interested to read the attached brief the Defendant filed with the Massachusetts Supreme Judicial Court.
 - On page 3, he admits he is "an undocumented immigrant" -- i.e., not the person he claimed to be at the RMV. And he argues that he shouldn't have to appear at trial because ICE will detain and deport him.

Finally, due to some recent changes in office policy, I need to send you the inquiry below. Please let me know if you have any questions.

You are receiving this message because you prepared a report or may serve as a witness in Commonwealth v. Wilson Martell-Lebron, incident #: [2020-H6-000311]. To comply with discovery obligations, I must instruct you to preserve any information or evidence that may be favorable to the defendant and ask that you let me know about any such information or evidence.

If you have any evidence relating to this incident, please preserve it and send it to me.

Please also respond with your work phone number and business address.

Finally, please respond to the following questions via email at the following email to jack.lucy@mass.gov:

1. Are you the subject of any pending criminal investigation, pending criminal charge, or past criminal conviction?
2. Are you the subject of any adjudicated finding of misconduct in a civil lawsuit related to your official duties?
3. Are you aware of any prior sustained finding or discipline as a result of an internal investigation into misconduct related to your official duties?
4. Are you aware of any adverse credibility determination related to your official duties, such as prior findings by a judge that you: testified untruthfully, made a false statement in writing, or engaged in other misconduct in your official duties?

An assistant district attorney must make this inquiry in every case in which you wrote a report or may serve as a witness. Accordingly, please provide this information even if you have provided it to the Suffolk County District Attorney's office before. Also, if any of your answers to the above questions change at any time during the pendency of this case, please immediately inform the assigned assistant district attorney of the change.