

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, s.s.

BOSTON MUNICIPAL COURT
CENTRAL DIVISION
NO. 2001CR000384

COMMONWEALTH

v.

WILSON MARTEL LEBRON

COMMONWEALTH'S NOTICE OF DISCOVERY

Now comes the Commonwealth in the above-captioned matter and respectfully states that on this date it has provided counsel for the defendant with the following discovery material pursuant to the Court's March 28, 2025 order:

1. ADA Amanda Corrin's text to ADA Christopher Boutin (Bates#000001);
2. ADA Amanda Corrin's email about case (Bates#000002);
3. ADA Christopher Boutin's text to ICE Agent Wells (Bates#000003);
4. ADA Amelia Singh's email about the case (Bates#000004)
5. ADA Matthew Lieber's text communications with Trooper David Dumont (Bates#000005-6);
6. Special ADA Jack Lucy's communications with Sullivan, Dumont, and Thompson (Bates#000007-173)

only one
provided →

Additionally, pursuant to Rule 14(c)(1)(e), the Commonwealth discloses that on 7:05 pm on Friday March 28, 2025, ADA Christopher Boutin called ICE Agent Brian Sullivan to inform him of the court's order to be present on Monday, March 31, 2025, and to preserve and provide communications related to the case. During this conversation Sullivan claimed that during a meeting with ADA Lieber and ADA Lucy and the Troopers at the lunchbreak, Sullivan told them that he was going to take the defendant into custody and if the defendant went outside the courthouse for lunch Sullivan was going to grab him. Sullivan claimed that he made his intent clear, though he immediately stated that

he thought it went over the ADAs heads because the ADAs seemed to be having a bad day due after having argued motions in limine.

Respectfully Submitted
For the Commonwealth,

KEVIN R. HAYDEN
DISTRICT ATTORNEY

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Dated: March 31, 2025

CERTIFICATE OF SERVICE

I hereby certify, under the pains and penalties of perjury, that I have today made service defense counsel in hand.

Cailin Campbell

CAILIN M. CAMPBELL
Assistant District Attorney

March 31, 2025