Paul,

After arguing defendant's discovery motion for information regarding drone equipped technology, Judge McGuire has ordered me to provide the defendant with the following:

- 1. Any additional data obtained by police during surveillance of the defendant on November 30 and December 6, 2018 and
- 2. Any reports, recording or other data obtained through additional surveillance of the defendant on any other dates in the course of this investigation

Judge McGuire has ordered me to provide this information within a month. I understand from our conversations that you were not the lead investigator, but you are the affiant and I do not know who is the lead investigator for the Southeastern Massachusetts Gang Task Force for this investigation.

I have provided the defendant with the aerial surveillance from November 30 and December 6, 2018. And, of course, I have the surveillance observations detailed in the search warrant affidavit. But, now I need to provide the above listed items. If there is no additional data from November 30 and December 6, 2018 and there are no other reports, recordings or other data through additional surveillance on any other dates during this investigation, then I need to put that in writing.

Please advise as soon as possible so we can move this case along.

Thank you.

Carolyn M. Morrissette Assistant District Attorney Bristol County District Attorney's Office 186 South Main Street, Suite 116 Fall River, MA 02721 Phone 774-627-1600 Fax 508-676-0108

From: Morrissette, Carolyn (BRI) Sent: Friday, May 22, 2020 12:18 PM To: Dunderdale, Paul (POL) Cc: O'Sullivan, Karen (BRI) Subject: RE: (a) CORI

Paul,

Thank you for responding. We did speak a few months ago, but not about this discovery. In your affidavit, paragraphs 27-30, there is specific mention of aerial surveillance. In the discovery that was previously provided by the police, there is aerial surveillance from November 20, 2018 and December 6, 2018. This discovery motion pertains to the aerial surveillance from those two dates. If you cannot provide this information, can you provide me with the name and contact information for who can? I have never had success in obtaining discovery from the feds and, frankly, this case will likely be dismissed if they choose not to cooperate. Det. Danner was supposed to get me reports regarding the seizure of the 23K from the feds and the feds have not responded.

I still need the MSP policy because MSP was involved in the investigation.

Thank you.

Carolyn

From: Dunderdale, Paul (POL) Sent: Friday, May 22, 2020 11:56 AM To: Morrissette, Carolyn (BRI) Cc: O'Sullivan, Karen (BRI) Subject: Re: (a) CORI

Hi Carolyn, sry for late response this week. I thought we spoke about this a few months ago. There was not a drone involved, it was an FBI plane. You would need to contact them for their policies. I was told I cannot answer for them. Do you need the MSP policy, even though it was not our aircraft?

Trooper Paul Dunderdale #3248 Massachusetts State Police Gang Unit - New Bedford/Fall River/Taunton Cell: (C) privacy Email: Paul.Dunderdale@massmail.state.ma.us

From: Morrissette, Carolyn (BRI) <Carolyn.M.Morrissette@MassMail.State.MA.US>
Sent: Friday, May 22, 2020 10:25 AM
To: Dunderdale, Paul (POL) <paul.dunderdale@pol.state.ma.us>
Cc: O'Sullivan, Karen (BRI) <Karen.OSullivan@MassMail.State.MA.US>
Subject: (a) CORI

Paul,

I have this case on next Thursday for motion. As you know, I need the discovery listed below. If I fail to provide the discovery once the Court orders it, it could result in the case getting dismissed. Can you please assist in obtaining the below listed discovery? Thank you.

Carolyn M. Morrissette Assistant District Attorney Bristol County District Attorney's Office 186 South Main Street, Suite 116 Fall River, MA 02721 Phone 774-627-1600 Fax 508-676-0108

From: Morrissette, Carolyn (BRI) Sent: Monday, May 18, 2020 8:53 AM To: Dunderdale, Paul (POL) Subject: FW: (a) CORI Importance: High

Hi Paul,

Please see below. I have this case on for next week. Can you please provide me with the discovery listed below?

Thanks.

Hope you and your family are doing well.

Carolyn

From: Morrissette, Carolyn (BRI) Sent: Friday, February 14, 2020 1:05 PM To: Dunderdale, Paul (POL) Subject: (a) CORI

Hi Paul,

I got a further date for Officer Danner to provide the redacted report regarding the seizure of the \$23,000. The defendant has now filed a motion seeking information on the drone.

Can you provide the following or tell me who I should contact to get this discovery:

- 1. Written rules, regulations, policies, procedure, standing order or other directives regarding the implementation and use of drone aerial surveillance of MSP or any other agency involved in the investigation
- 2. The body of methods and material used by the drones in the investigation to achieve its surveillance objectives, including whether the drove aerial surveillance is equipped with
- Ability to capture images and video
- Ability to retain data
- Ability to recognized license plates
- Global Positioning System (GPS) technology

- Ability for live feed video
- Ability to live stream video smart phone or other electronic devices
- Ability of the drove to hover and stare
- Ability to use thermal imaging

Please contact me with any questions. Thank you.

Carolyn M. Morrissette Assistant District Attorney Bristol County District Attorney's Office 186 South Main Street, Suite 116 Fall River, MA 02721 Phone 774-627-1600 Fax 508-676-0108

This e-mail message is generated from the Office of the Bristol County District Attorney and contains information that is confidential and may be privileged as an attorney/client communication or as attorney work product. The information is intended to be disclosed solely to the addressee(s). If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this email information is prohibited. If you have received this email in error, please notify the sender by return email and delete it from your computer system.

This e-mail message is generated from the Office of the Bristol County District Attorney and contains information that is confidential and may be privileged as an attorney/client communication or as attorney work product. The information is intended to be disclosed solely to the addressee(s). If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this email information is prohibited. If you have received this email in error, please notify the sender by return email and delete it from your computer system.