I. Statement of Purpose

The Division of Criminal Justice (DCJ) recognizes the state's obligations to disclose exculpatory and impeachment information to criminal defendants and to seek a just result in every case. Consistent with these obligations, it is the policy of DCJ that prosecutors shall follow controlling law governing the timely disclosure of exculpatory and impeachment information. In doing so, prosecutors shall protect the legitimate privacy rights of law enforcement agency employees and non-law enforcement agency witnesses.

Section I of the policy provides an overview of Brady and Giglio, including discussions of: (A) the collective knowledge of the prosecution team, (B) cooperating witnesses, (C) timing of disclosure, and (D) summary points. Section II provides guidelines for gathering and reviewing exculpatory and impeachment information and: (A) requirements for obtaining background information on prosecution team witnesses (the "Giglio letter"); (B) additional requirements when calling federal witnesses (the "Touhy letter"); and (C) advice concerning open source information.

II. Overview

In Brady v. Maryland, 373 U.S. 83, 87 (1963), the United States Supreme Court held that "suppression by the prosecution of evidence favorable to an accused . . . violates due process where the evidence is material either to guilt or punishment, irrespective of the good or bad faith of the prosecution." A prosecutor who "withholds evidence . . . which, if made available, would tend to exculpate [the defendant] or reduce the penalty . . . casts the prosecutor in the role of an architect of a proceeding that does not comport with standards of justice. . . ." Id. at 87-88; accord Cone v. Bell, 556 U.S. 449, 474-75 (2009) (prosecutor's Brady obligation applies not only to evidence that negates guilt but also extends to any evidence that mitigates punishment).

The Supreme Court later explained in Giglio v. United States, 405 U.S. 150, 154-55 (1972), that, in addition to purely exculpatory evidence, favorable evidence under the *Brady* rule includes *impeachment evidence* – that is, any information that the defense might use to impeach the State's witnesses by showing, for example, bias or interest. Thus, the prosecution must disclose any "evidence affecting [the] credibility" of prosecution witnesses to the defense. Id. at 154; see Adams v. Commissioner of Correction, 309 Conn. 359, 369-70 (2013) (impeachment evidence, broadly defined, is evidence "having the potential to alter the jury's assessment of the credibility of a significant prosecution witness" (internal quotation marks omitted)). Significantly,

pursuant to Giglio, the prosecution is responsible for the nondisclosure of impeachment evidence regardless of whether the nondisclosure resulted from negligence or design. Giglio, 405 U.S. at 154.

Under Brady, materiality is necessarily retrospective and virtually impossible to apply before trial when so many aspects of the trial are "unknown and unknowable," such as the theory of defense, the court's rulings on motions in limine, and the content of jury instructions. Accordingly, "[t]he only question before (and even during) trial is whether the evidence at issue may be 'favorable to the accused' . . . ." United States v. Safavian, 233 F.R.D. 12, 16 (D.D.C. 2005).

In Connecticut, our Brady and Giglio obligations are codified by statute and incorporated into our practice rules, rules of professional conduct, and prosecution standards. Specifically, General Statutes § 54-86c provides, in pertinent part, that

> [n]ot later than thirty days after any defendant enters a plea of not guilty in a criminal case, the state's attorney, assistant state's attorney or deputy assistant state's attorney in charge of the case shall disclose any exculpatory information or material which he may have with respect to the defendant whether or not a request has been made therefor. If prior to or during the trial of the case, the prosecutorial official discovers additional information or material which is exculpatory, he shall promptly disclose the information or material to the defendant.

General Statutes § 54-86c(a); see also General Statutes § 54-142k. Practice Book § 40-11 provides, in pertinent part, that

> the prosecuting authority shall disclose to the defendant, in accordance with any applicable constitutional and statutory provisions, any exculpatory information or materials that the prosecuting authority may have, whether or not a request has been made therefor.

Practice Book § 40-11(b); see also Practice Book §§ 40-12 through 40-15. Rule of Professional Conduct 3.8 provides that a prosecutor shall

> [m]ake 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 of Professional Conduct 3.8(4). Finally, the Connecticut Prosecution Standards provide, in pertinent part, that

> [a]fter charges are filed if not before, the prosecutor should diligently seek to identify all information in the possession of the prosecution or its agents that tends

> to negate the guilt of the accused, mitigate the offense charged, impeach the government's witnesses or evidence, or reduce the likely punishment of the accused if convicted. . . .
>
> Before trial of a criminal case, a prosecutor should make timely disclosure to the defense of information described above that is known to the prosecutor, regardless of whether the prosecutor believes it is likely to change the result of the proceeding, unless relieved of this responsibility by a court's protective order.

Conn. Prosecution Standard 4-8.1 & commentary.

A. The Collective Knowledge of the "Prosecution Team"

The state's duty to disclose exculpatory evidence applies not only to evidence known to the prosecutor trying the case, but also extends to evidence known to any member of the "prosecution team," which includes both prosecutorial and investigative personnel. See State v. Guerrera, 331 Conn. 628, 647 (2019) (prosecutor has duty to learn of exculpatory evidence in possession of any entity acting as agent or arm of state in connection with investigation at issue). The prosecutor is deemed to possess all favorable evidence, and is deemed to know if any member of the prosecution team possesses favorable evidence, even if the prosecutor does not have actual possession or knowledge of that favorable evidence. Thus, the duty to disclose extends to exculpatory evidence known to any DCJ prosecutor, inspector, or investigator, as well as the state police, any local police department, or other state or local officials involved in the investigation of the matter. See Stevenson v. Commissioner of Correction, 165 Conn. App. 355, 367 (relevant inquiry in determining whether person was part of prosecution team is "what the person *did*, not who the person *is*" (emphasis in original)), cert. denied, 322 Conn. 903 (2016). In short, the collective knowledge of the entire prosecution team will be imputed to you as the prosecutor in the case. Demers v. State, 209 Conn. 143, 153 (1988).

Inspectors and investigators need to be acutely aware of established Second Circuit caselaw holding that the disclosure requirements of Brady apply not only to prosecutors, but to the police in general, who have a duty to disclose material exculpatory and impeachment evidence to prosecutors. See Walker v. City of New York, 974 F.2d 293, 299 (2d Cir. 1992); see also General Statutes § 54-86c(c). Failure to do so may expose them to potential civil liability under 42 U.S.C. § 1983. See Bellamy v. City of New York, 914 F.3d 727, 751 (2d Cir. 2019) ("When police officers withhold exculpatory or impeaching evidence from prosecutors, they may be held liable under § 1983 for violating the disclosure requirements of Brady v. Maryland . . . ."); see also Horn v. Stephenson, 11 F.4th 163, 171-74 (2d Cir. 2021) (affirming district court's conclusion that ballistics and firearms expert from state crime lab, who assisted in investigation of case by identifying potential gun models utilized in shooting, was member of prosecution team subject to civil liability in § 1983 action for failure to disclose report).

Horn bears special attention with regard to its characterization of employees of the Connecticut State Police Forensic Science Laboratory. The decision holds that government employees such as lab technicians and forensic experts are law enforcement members of the prosecution team with disclosure obligations under Brady. See Horn, 11 F.4th at 171. As such, the existence of exculpatory evidence in the possession of state lab employees working on the case, or their knowledge thereof, will be imputed to the trial prosecutor. This means that prosecutors must be particularly diligent when requesting and reviewing materials from the lab. Prosecutors are strongly advised to obtain and review the forensic laboratory's entire file (case jacket and bench notes) using the letter attached to this policy ("Exhibit A") to ensure the effective discharge of our Brady obligations.

B. Cooperating Witnesses

Promises, offers, and inducements to a prosecution witness to secure the witness's testimony – no matter their form – constitute evidence favorable to the accused that must be disclosed. United States v. Bagley, 473 U.S. 667, 676-78 (1985); see State v. Grasso, 172 Conn. 298, 302 (1977) ("Information that a witness has been arrested, is being prosecuted, or has confessed to a crime, tends to show that the state has power over a witness which may induce him to give testimony which will win favor with the state . . . and must be disclosed."). Note that Giglio imposes an affirmative duty on the prosecutor to learn of any such promises, offers, and inducements made to a witness by anyone "acting on the government's behalf in the case," including investigating agents. Kyles v. Whitley, 514 U.S. 419, 437 (1995). In this regard, the collective knowledge of all DCJ prosecutors is imputed to the individual prosecutor trying the case, and vice versa. In other words, a promise made to a witness by one prosecutor binds all other prosecutors in the Division. See Giglio, 405 U.S. at 154. Before trying your case, therefore, you must ascertain whether your witnesses have pending cases and/or recent convictions in other judicial districts; inquire whether any offers have been made (by the state *or* the court) in connection with those cases; and, if so, disclose any inducement to the defense. To assist in this endeavor, prosecutors shall consult and provide timely updates to the jailhouse witness tracking database. See DCJ Policy No. 515a (Jailhouse Witnesses); Conn. Prosecution Standard 2-10.10 & commentary.

Always remember the following important corollary to your duty to disclose promises, offers, and inducements made to a prosecution witness. Pursuant to Napue v. Illinois, 360 U.S. 264, 269 (1959), and Giglio, 405 U.S. at 153, when a prosecutor knows that a witness has falsely denied striking a plea deal with the state, or knows that the witness has substantially mischaracterized the nature of an inducement, the prosecutor has an obligation to correct any misconception. See Gomez v. Commissioner of Correction, 336 Conn. 168, 185-86 (2020) (prosecutor has duty to correct material, false or misleading testimony regarding cooperation agreement *even if agreement at issue has been disclosed to defense counsel*). It does not matter whether the cooperating witness actually intended to lie. Napue and Giglio require that the prosecutor apprise the court

whenever the prosecutor knows the witness is giving testimony that is "substantially misleading." State v. Ouellette, 295 Conn. 173, 186 (2010).

To avoid the potential pitfalls associated with presenting the testimony of cooperating witnesses at trial, all cooperation agreements entered into by DCJ staff shall be in writing and signed by the parties in accordance with DCJ Policy 515 "Cooperating Witnesses." See Ouellette, 295 Conn. at 191-92 (expressing concern over discrepancies between cooperating witness's testimony regarding parameters of plea agreement with state and prosecutor's subsequent representations regarding agreement at time of witness's sentencing); see also Conn. Prosecution Standard 2-10.9 & commentary.

C. Timing of Disclosure

Brady information must be disclosed early enough "for its effective use at trial." (Internal quotation marks omitted.) State v. Pollitt, 199 Conn. 399, 414 (1986); see also United States v. Coppa, 267 F.3d 132, 135 (2d Cir. 2001) (evidence is "suppressed" within the meaning of Brady if not disclosed in time for its effective use at trial); see also General Statutes § 54-86c(a); Practice Book §§ 40-11, 40-13 & 40-13A. Be aware that, with regard to potential impeachment material, in practice this means prior to your witness testifying at any adversarial proceeding (i.e., probable cause hearing, suppression hearing, or violation of probation hearing). See State v. Mitchell, 200 Conn. 323, 338 (1986) ("Since the adversarial probable cause hearing … is an essential part of a defendant's criminal prosecution, the constitutional obligation to disclose exculpatory material attaches at that time.").

Further, although our courts have not established a bright-line rule as to when a prosecutor must disclose exculpatory evidence in time for its "effective use," the courts have made clear you should never conceal the existence of such evidence to gain a tactical advantage; instead, you should disclose such evidence as soon as reasonably practicable. When confronted with a "close call" as to whether certain evidence qualifies as Brady or Giglio material, you should immediately contact your direct supervisor for assistance. See United States v. Agurs, 427 U.S. 97, 108 (1976) ("[T]he prudent prosecutor will resolve doubtful questions in favor of disclosure.").

Summary Points

1. Brady and Giglio impose an independent obligation on you, as the prosecutor, to seek out and timely disclose exculpatory and impeachment information. See also General Statutes § 54-86c; Practice Book § 40-11(b); Rule of Professional Conduct 3.8(4); Conn. Prosecution Standard 4-8.1 & commentary.

2. Giglio instructs us that potential impeachment information constitutes exculpatory evidence under the Brady rule.

3. You have an affirmative duty to seek out and disclose all exculpatory evidence or impeachment material known to any member of the "prosecution team."

4. For Brady and Giglio disclosure purposes, your "prosecution team" includes any prosecutor or inspector within DCJ, as well as all law enforcement officers, or other officials, involved in the investigation of the matter. See General Statutes § 54-86c(c).

5. The law imputes the collective knowledge of the entire "prosecution team" to you individually as the prosecutor handling the case.

6. Brady and Giglio material must be disclosed to the defense even if opposing counsel does not ask for it. See General Statutes § 54-86c(a); Practice Book § 40-11(b).

7. Brady and Giglio information must be disclosed early enough "for its effective use at trial," which, in practice, means potential impeachment material must be disclosed before your witness testifies at an adversarial proceeding.

8. Your Brady obligations apply not only to evidence that negates guilt but also extends to any evidence that mitigates punishment.

9. When confronted with a "close call" over Brady or Giglio material, you should err on the side of caution and disclose it to opposing counsel or request in camera inspection. See General Statutes § 54-86c(b). If in doubt as to whether certain evidence qualifies as Brady or Giglio material, you should immediately contact your direct supervisor for assistance.

10. If in camera review occurs, request that material be "lodged" with the court pursuant to Practice Book § 7-4C (providing that a "'lodged' record is a record that is temporarily placed or deposited with the court but not filed" and that such records may be lodged with the court "under seal"). If you request that material be "filed" under seal, or if the trial court treats the material as having been "filed" under seal, it will trigger the requirements for denying public access to "documents filed with the court," pursuant to Practice Book § 42-49A.

11. Failure to disclose exculpatory or impeachment evidence may result in the reversal of a conviction, or other sanctions, regardless of whether your failure to do so was a result of inadvertence or ignorance. Failure to disclose Brady or Giglio material violates due process regardless of your good or bad faith.

III. Gathering and Reviewing Exculpatory and Impeachment Information

All potential Brady and Giglio information known by or in the possession of the prosecution team must be gathered and reviewed to determine whether it is exculpatory in nature. Giglio information includes, but is not limited to:

1. Prior inconsistent statements made by the witness, whether or not the inconsistent statement was made to law enforcement.

2. Inducements provided to witnesses in exchange for their cooperation, such as:

   (a) Dropped or reduced charges;

   (b) Use immunity or agreements not to prosecute;

   (c) Agreements to bring to the sentencing judge's attention information concerning the witness's cooperation or assistance;

   (d) Agreements or promises regarding the witness's participation in pretrial diversionary programs;

   (e) Agreements to limit the state's arguments for a sentence;

   (f) Promises regarding the forfeiture of assets;

   (g) Stays of deportation or other immigration status benefits;

   (h) Any tangible or monetary benefits, including payments for information, travel reimbursement, provision of lodging or travel, or the provision of any other pecuniary benefit, including minor outlays;

   (i) Letters to other government officials setting forth the extent of a witness's assistance; and

   (j) Promises relating to the witness protection program.

3. Other known conditions that could affect the witness's bias, including, but not limited to:

   (a) Animosity toward the defendant;

   (b) Relationship with the victim;

   (c) Known but uncharged criminal conduct;

(d) Known prejudice or animosity toward any group of which the defendant is a member.

4. Known physical, mental health, or substance abuse issues that reasonably could impact the witness' ability to recall or perceive the events about which they will be testifying.

5. Prior criminal convictions for felonies or crimes of moral turpitude.

6. Where self-defense reasonably could be raised by the accused, convictions of the victim for crimes of violence and any other information that is material to the victim's reputation for violence.

Although the responsibility for compliance with discovery obligations rests with the prosecutor, the prosecutor need not personally examine each potentially discoverable piece of information. See State v. Andres C., 349 Conn. 300, 327-45 (2024) (prosecutor not constitutionally required to personally review victim's 200-page journal that was handwritten in Spanish). Nevertheless, our Supreme Court recently has advised that "it is the better practice for prosecutors personally to review the information, or at least to seek assistance from attorneys, or other qualified staff members, who have received comprehensive training in the requirements Brady and who are sufficiently knowledgeable about the case, including possible defenses, to appreciate the import of the information under review." Id. at 339-40 (emphasizing that Brady material review "is quintessentially a prosecutor's role" and that "the prosecutor bears ultimate responsibility for compliance with Brady").

A. Background Information on Your Prosecution Team Witnesses (The "Giglio Letter")

An integral part of fulfilling your obligations pursuant to Brady and Giglio is obtaining all background information on your prosecution team witnesses that may constitute impeachment material reflecting upon interest, bias, or credibility. As such, a written request ("Giglio letter") shall be made prior to any adversarial proceeding in which a DCJ prosecutor intends to call a local or state police officer or other state agent or employee who acted as an agent or arm of state as a witness using the exemplar letter attached to this policy ("Exhibit B").

The request shall be made to the local Chief of Police or the Commissioner of Public Safety or other state agency director, and shall specifically request that DCJ be informed of:

(1) any prior sustained findings of misconduct that reflect upon the veracity or possible bias of the witness, including a finding of untruthfulness during a criminal, civil, or administrative inquiry or proceeding;

(2) any past or pending criminal charge brought against the witness;

(3) any credible allegation of misconduct against the witness that reflects upon the truthfulness or possible bias of the witness that is currently under investigation;

(4) any misconduct finding or pending misconduct allegation that casts a substantial doubt upon the accuracy of any evidence that the state intends to rely on to prove an element of any crime charged or that might have a significant bearing on the admissibility of prosecution evidence (i.e., failure to follow legal or agency requirements for collection or handling of evidence, obtaining consents/statements, recording communications; failure to follow mandatory protocols with regard to forensic analysis of evidence); and

(5) information that reflects that the witness's ability to perceive and recall truth is impaired.

Allegations that cannot be substantiated, are not credible, or have resulted in the exoneration of an employee generally are not considered to be potential impeachment information and need not be disclosed.

Prosecutors shall ensure that special care is taken to protect the confidentiality of such information and the privacy interests and reputations of investigative agency employee-witnesses. This includes, in appropriate cases, lodging records received in accordance with this policy under seal with the trial court to obtain an in camera review prior to disclosure to the defense.

At the conclusion of the case, if such information was not disclosed to the defense, the prosecutor shall ensure that all materials received from an investigative agency regarding the allegation, including any and all copies, are expeditiously returned to the investigative agency. Information lodged with the court, however, shall remain lodged with the court.

B. Additional Requirements When Calling Federal Employee Witnesses (The "Touhy Letter")

Special considerations apply when DCJ staff seek to subpoena an agent of the United States Department of Justice (DOJ) in any proceeding in state court. The regulations appearing in Part 16 of Title 28 of the Code of Federal Regulations (CFR) are commonly referred to as the "Touhy regulations." These regulations, named after the Supreme Court's decision in United States ex rel. Touhy v. Ragen, 340 U.S. 462 (1951), provide in relevant part, that no present or former employee of the DOJ (which includes, *inter alia*, FBI, DEA, ATF and U.S. Marshals) may testify or produce DOJ records in response to subpoenas issued in any state proceeding without obtaining prior approval from the United States Attorney's Office (USAO). Such information includes but is not limited to the following:

- Any material contained in the files of the DOJ;
- Any information relating to material contained in the files of the DOJ;
- Any information acquired by an employee of the DOJ as part of the performance of that employee's official duties or because of the employee's official status.

To gain approval from the USAO to allow a federal agent to testify in state court, you must send a "Touhy letter" (see sample letter attached to this policy as "Exhibit C") addressed to the United States Attorney for the District of Connecticut providing the following information for consideration:

- The identity of the agent and agency;
- A description of the relevance of the desired testimony and/or records to the state criminal proceeding, including the name of the defendant and pending charges;
- Information demonstrating that the desired testimony and/or records are not reasonably available from any other source;
- An outline of the substance of the proposed testimony expected by the agent;
- A request that DOJ provide the DCJ with any Giglio information concerning the agent, to include any sustained findings of misconduct that reflect upon the veracity or possible bias of the witness agent, any criminal charges against the agent pending during the investigation and/or prosecution of the case, and any credible allegation of misconduct currently under investigation.

C. Open Source Information

It is entirely appropriate, and in fact advisable, for DCJ staff to utilize open source information when complying with their Giglio obligations. Open source information may be defined as publicly available information appearing in print or electronic form. A simple Google search of a potential witness may reveal information that constitutes Giglio material. While there is no caselaw in the jurisdiction that holds you responsible for actively seeking such material from outside public sources, such an effort serves as a valuable check upon your other sources of information within the prosecution team. In the past, a quick online search by a DCJ prosecutor yielded potential impeachment material regarding his own prosecution witness that otherwise may have eluded him, despite his diligence in requesting Giglio material from a participating agency.

[History: This policy was originally adopted in July 2022. It was revised on August 14, 2024 for formatting and technical changes, to add references to the Connecticut Prosecution Standards, and to update the reference to State v. Andres C., 349 Conn. 300 (2024).]

Exhibit A – Letter to State Forensic Laboratory

[Name of Director/Deputy Director]
Department of Emergency Services and Public Protection
Division of Scientific Services
278 Colony Street
Meriden, Connecticut 06451

Re: State v. [Name of Defendant], Docket No. [number]

Dear [Name of Director/Deputy Director],

I represent the State of Connecticut in the above-referenced criminal case, [for which a hearing in probable cause is scheduled to occur / which is scheduled to begin trial, etc.] on [date].

I am requesting the entire file, including the case jacket, bench notes, photos, etc., for State v. [Name of Defendant], laboratory case number [_____].

Should you have any questions, please feel free to contact me. Thank you in advance for your anticipated cooperation.

Very truly yours,

[Name of prosecutor]

Exhibit B – Letter to Chief of Police or Commissioner of Public Safety or Other State Agency Director (The "Giglio Letter")

[Chief of Police/Commissioner of Correction/State Agency Director]
[address]

Re: [Name(s) of Officer(s)/Agent(s)/Employee(s)]

Dear [Chief/Commissioner/Director Name]:

I have identified the above-named [officer(s)/agent(s)/employee(s)] as [a potential witness / potential witnesses] in State v. [Name of Defendant]. I anticipate that the trial of this matter will begin on [date]. I am writing to request that you provide me with any potential impeachment material contained in the records of your agency. In particular, I am required to disclose information relating to:

(1) any prior sustained finding(s) of misconduct that reflect upon the veracity or possible bias of the [officer(s)/agent(s)/employee(s)], including a finding of untruthfulness during a criminal, civil, or administrative inquiry or proceeding;

(2) any past or pending criminal charge brought against the [officer(s)/agent(s)/employee(s)];

(3) any credible allegation of misconduct against the [officer(s)/agent(s)/employee(s)] that reflects upon the truthfulness or possible bias of the [officer(s)/agent(s)/employee(s)] that is currently under investigation;

(4) any misconduct finding or pending misconduct allegation that casts a substantial doubt upon the accuracy of any evidence that the state intends to rely on to prove an element of any crime charged or that might have a significant bearing on the admissibility of prosecution evidence (i.e., failure to follow legal or agency requirements for collection or handling of evidence, obtaining consents/statements, recording communications; failure to follow mandatory protocols with regard to forensic analysis of evidence); and

(5) information that reflects that the [officer(s')/agent(s')/employee(s')]'s ability to perceive and recall truth is impaired.

Please note that allegations that cannot be substantiated, are not credible, or have resulted in exoneration generally are not considered to be potential impeachment information and need not be disclosed. Should you have any questions, please feel free to contact me or State's Attorney [Name]. Thank you in advance for your anticipated cooperation.

Very truly yours,

[Name of prosecutor]

Exhibit C – Sample "Touhy Letter"

[Name of U.S. Attorney]
United States Attorney for the District of Connecticut
Connecticut Financial Center
157 Church Street, 25th Floor
New Haven, CT 06510

Re: State of Connecticut v. [Name of Defendant], Docket No. [_____]

Dear United States Attorney [Name],

I am writing to seek your approval to permit [Agent Name] of [Name of Agency] to testify in the Judicial District of [Name] on [date].

In State of Connecticut v. [Name of Defendant], the defendant is charged with [name(s) of crimes]. Agent [Name's] testimony is relevant to the State's case because [he / she] [brief description of relevance of testimony or records witness will testify about to case and why information is not reasonably available from any other source].

I anticipate that Agent [Name] will testify [brief outline of proposed testimony].

Should you grant approval for Agent [Name] to testify in state court, I request that your office provide to me any sustained findings of misconduct that reflect upon the veracity or possible bias of Agent [Name], any past or pending criminal charges against Agent [Name], and any credible allegation of misconduct currently under investigation.

Please feel free to contact me or State's Attorney [Name] if you have any questions. Thank you for your assistance.

Very truly yours,

[Name of prosecutor]