

Archived: Thursday, January 6, 2022 2:58:07 PM

From: [Robert Bulloch](#)

Sent: Friday, August 27, 2021 2:00:01 PM

To: [Randall Gaylord](#)

Cc: [Lindsey Callahan](#)

Subject: Request for Consideration of Brady

Response requested: Yes

Importance: Normal

Attachments:

[Certification of Probable Cause--Maya.pdf](#); [Green & Kanstad Motion to Dismiss--Young, Jason.pdf](#);

Original mail: [Request for Consideration of Brady.msg](#) 

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Randy:

As you may know, I was recently involved in the District Court case of State v. Jason Young, Court Case Number 21-32. During the trial it was revealed that the only statement directly implicating Mr. Young in the crime and stated in the Certification of Probable Cause was inaccurate and untrue. For your review and consideration of these circumstances, I have attached the Probable Cause Certification and the Motion I filed during the trial. And I am copying Ms. Callahan on this email.

The jury returned a “not guilty” verdict. I spoke with a juror (Juror #4) after the trial and he was upset that our county spent the resources and time on this matter given the facts and circumstances of the case.

Be that as it may, I was also speaking with a former colleague of mine in the San Bernardino County District Attorney’s office who was visiting my home at the time of the verdict. Obviously, I have learned that things run differently here in San Juan County and Washington in general, but nonetheless, as my colleague reminded me, the mandate of *Brady* applies throughout the United States.

In my view, the level of material misrepresentation involved in this matter is significant. I invite you to review and consider the situation and determine if you agree the deputy’s conduct does rise to the level of mandating a *Brady* disclosure. I do not ask this lightly and am fully aware that the deputy no longer works for San Juan County. But I also know he remains a witness on many pending cases.

If you have any questions or would like to discuss this matter further, I would be happy to meet with you.

Respectfully,

P004815-120921-000013

Bob Bulloch

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