

Barry C. Scheck, Esq.  
Peter J. Neufeld, Esq.  
Directors

Maddy deLone, Esq.  
Executive Director

Innocence Project  
40 Worth Street, Suite 701  
New York, NY 10013  
Tel 212.364.5340  
Fax 212.364.5341

[www.innocenceproject.org](http://www.innocenceproject.org)

***By overnight mail***

July 20, 2017

Constance C. Vecchione  
Bar Counsel  
Office of the Bar Counsel  
99 High Street, 2nd floor  
Boston, Massachusetts 02110

Re: Anne Kaczmarek, BBO # 644812  
Kris Foster, BBO # 672376

Dear Ms. Vecchione:

Pursuant to Rule 8.3 of the Massachusetts Rules of Professional Conduct, we respectfully submit the attached Complaints and ask the Board of Bar Examiners to investigate the above-referenced attorneys for conduct occurring while each served as an Assistant Attorney General for the Commonwealth.

We understand that your office may already be aware of certain grounds for investigation into each of the above-referenced attorneys as set forth in Superior Court Judge Richard Carey's decision in *Commonwealth v. Cotto, et. al.*, (Ind. No. 2007-700) (June 26, 2017), and from other counsel and members of the public who may have already alerted your office to the Court's decision. However, as *amici* in the *Cotto* litigation who are familiar with the record, we thought it might aid the Board's consideration to provide additional information and applicable authorities on the specific grounds for investigation concerning each of these individual attorneys.

Included with each of these Complaints are copies of Judge Carey's decision, as well as USB drives containing the transcripts of the Court's earlier hearing into allegations of misconduct by the Attorney General's Office and selected exhibits from the *Cotto* litigation.

Should you require any of the other *Cotto* exhibits, or any other information to assist you in your review, please do not hesitate to let us know.

Thank you in advance for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Nina Morrison', with a long horizontal flourish extending to the right.

Nina Morrison  
Senior Staff Attorney  
Innocence Project

A handwritten signature in black ink, appearing to read 'Daniel S. Medwed', with a circular flourish at the beginning.

Daniel S. Medwed  
Professor of Law and Criminal Justice  
Northeastern University