

PLANTE & HANLEY, P.C.
LAWYERS
POST OFFICE BOX 708
WHITE RIVER JUNCTION, VERMONT 05001-0708

PETER P. PLANTE (1920-1996)
MICHAEL F. HANLEY*
PAUL J. PERKINS†

TELEPHONE 802-295-3151
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MFHANLEY@PLANTEHANLEY.COM
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*Admitted in VT, NH and ME
†Admitted in VT and NH

September 26, 2025

Professional Responsibility Program
Merrick Grutchfield, Program Administrator
109 State Street
Montpelier, VT 05609-0701

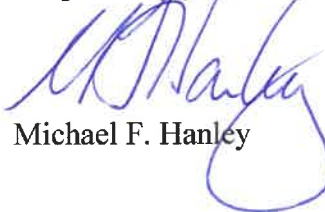
BY FIRST CLASS U.S. MAIL AND EMAIL (merrick.grutchfield@vermont.gov)

In Re: Thomas Melone; PRB File No. 25-120

Dear Merrick:

I enclose *Conflict Disciplinary Counsel's Motion for Service by Email* and my *Certificate of Service*.

Respectfully yours,



Michael F. Hanley

MFH/shg

Enclosures

cc: Thomas M. Melone (via U.S. Mail and email)

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Thomas Melone
PRB File No. 25-120

CONFLICT DISCIPLINARY COUNSEL'S MOTION FOR SERVICE BY EMAIL

Pursuant to A. O. Rule 18, Conflict Disciplinary Counsel, Michael F. Hanley, moves that he be allowed to file and make service of the *Petition of Misconduct* and all subsequent pleadings and filings in this matter by email filing with Merrick Grutchfield, Program Administrator at:


merrick.grutchfield@vermont.gov

with copies to the Respondent by email to:

Thomas.Melone@gmail.com

In support of this Motion, Conflict Disciplinary Counsel submits an *Affidavit* which shows that pleadings sent to Mr. Melone by United States Certified Mail are not delivered to the Respondent, whereas emails to the Respondent are received almost immediately.

Dated: September 26, 2025



Michael F. Hanley
Conflict Disciplinary Counsel

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Thomas Melone
PRB File No. 25-120

AFFIDAVIT

1. This Affidavit is given in support of my motion, pursuant to A.O. 9, Rule 18, that I be allowed to make service of the Petition of Misconduct on Thomas M. Melone by sending a copy of his petition to him via email at thomas.melone@gmail.com and that Mr. Melone be given 20 days from the receipt of that email to file an answer.
2. On September 5, 2025, pursuant to A.O. 9, Rule 18, I sent a letter to Thomas M. Melone by Certified Mail, Restricted Delivery, Return Receipt Requested.
3. My September 5, 2025 letter to Mr. Melone stated in full:

I write in my capacity as Conflict Disciplinary Counsel in this matter.

On September 4, 2025, a Probable Cause Hearing Panel ruled that there was probable cause to conclude that you violated the Vermont Rules of Professional Conduct.

I enclose a copy of the *Notice of Probable Cause Decision*.

I enclose a copy of the *Petition of Misconduct*.¹
4. On September 5, 2025, I caused my September 5, 2025 letter to Mr. Melone to be delivered to the United States Postal Service (USPS) office in White River Junction, Vermont.
5. On September 5, 2025, the USPS issued a Certified Mail Receipt indicating that the total postage and fees was \$21.38. The USPS also issued an additional receipt showing that

¹ A copy of my September 5, 2025 letter to Mr. Melone is Exhibit 1.

the Certified Mail tracking number was 9589 0710 5270 1986 5167 97.²

6. On September 25, 2025, because I had received no reply to my letter to Thomas M. Melone dated September 5, 2025, I wrote to him, via email at the email address I have previously used to communicate with him, at thomas.melone@gmail.com. In my email to Mr. Melone, I stated in full:

Dear Mr. Melone:

Pursuant to Rule 11(d)(1) I sent you a letter dated September 5, 2025 enclosing copies of a Notice of Probable Cause Decision and a Petition of Misconduct. The letter was sent to the address shown on your last licensing statement. The letter was sent by Certified Mail, Restricted Delivery, Return Receipt Requested.

I enclose copies of my letter, the Probable Cause Decision, and the Petition of Misconduct.

Under Rule 11(D)(3), your answer is due within 20 days of the service of the Petition.³

7. On September 25, 2025, I received an email from Thomas M. Melone stating in full: "I just received this. I need additional time to respond."⁴
8. On September 25, 2025, I told Mr. Melone, via email, that I had no objection to his request for additional time, but that only the Chair of the Hearing Panel could grant his request.
9. On September 25, 2025, Thomas M. Malone sent me a copy of an email he sent that day

² Copies of the Certified Mail, Restricted Delivery receipt and USPS receipt showing the tracking number is Exhibit 2.

³ A copy of my September 25, 2025 email to Mr. Melone is Exhibit 3.

⁴ A copy of Mr. Melone's September 25, 2025 email to me is Exhibit 4.

to Ronald Shems. Mr. Melone incorrectly believed that Mr. Shems was the Chair of the Hearing Panel in this matter. The email stated in full:

Attorney Shems,

I request an extension to respond to the Petition of Misconduct dated September 4, 2025 in the above-captioned matter. I did not receive a hard copy of the Petition that Attorney Hanley mailed on September 5, 2025. The first time that I became aware of the petition was today when attorney Hanley emailed it to me.

I request an extension to October 2, 2025. Attorney Hanley does not object to the requested extension.⁵

10. On September 26, 2025, because of Mr. Melone's September 25, 2025 email to Mr. Shems, I went to the USPS's tracking website.
11. The tracking of number 9589 0710 5270 1986 5167 97 shows that my Certified Mail, Restricted Delivery mail:
 - a) was received by the United States Postal Service office in White River Junction, Vermont on September 5, 2025 at 12:39 PM;
 - b) left the White River Junction Post Office on September 5, 2025 at 5:42 PM;
 - c) arrived at the United States Postal Service Hartford, Connecticut Distribution Center on September 6, 2025 at 8:57 PM;
 - d) left the Hartford, Connecticut Distribution Center at 11:11 PM;
 - e) arrived at the Springfield, Massachusetts Distribution Center on September 7, 2025 at 10:54 PM;
 - f) left the Springfield, Massachusetts Distribution Center on September 8, 2025 at 5:36 AM;
 - g) arrived at New Haven, Connecticut on September 8, 2025 2:38 PM;

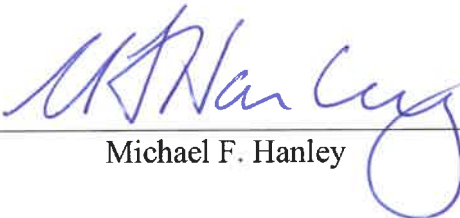
⁵ A copy of Mr. Melone's email to Mr. Shems is Exhibit 5.

- h) arrived at the Hartford Connecticut Distribution Center on September 13, 2025 at 4:31 PM; and
- i) was “in transit next facility, arriving late” on September 17, 2025.⁶

12. As of the date of this Affidavit, September 26, 2025, there is no evidence that the United States Postal Service delivered the letter entrusted to it on September 5, 2025 to the address shown on Mr. Melone’s last licensing statement.


13. I do not contest Mr. Melone’s statement that he became aware of the Finding of Probable Cause and the Petition of Misconduct on September 25, 2025.

Dated: September 26, 2025


Michael F. Hanley

STATE OF VERMONT
WINDSOR COUNTY, SS

At Hartford in the County of Windsor and State of Vermont, Michael F. Hanley, a person known to me, personally appeared before me and swore that his Affidavit was true.



Notary Public
My Commission Expires: _____

PAUL J. PERKINS Notary Public, State of Vermont Commission # 157.0010074 My Commission Expires January 31, 2027

⁶ A copy of the United States Postal Service tracking information obtained from the USPS.com website is attached and identified as Exhibit 6.

EXHIBIT 1

PLANTE & HANLEY, P.C.
LAWYERS
POST OFFICE BOX 708
WHITE RIVER JUNCTION, VERMONT 05001-0708

PETER P. PLANTE (1920-1996)
MICHAEL F. HANLEY*
PAUL J. PERKINS†

*Admitted in VT, NH and ME
†Admitted in VT and NH

TELEPHONE 802-295-3151
FACSIMILE 802-547-8228
MFHANLEY@PLANTEHANLEY.COM
PJPERKINS@PLANTEHANLEY.COM
WWW.PLANTEHANLEY.COM

September 5, 2025

Thomas M. Melone
Allco Renewable Energy
157 Church St., 19th Floor
New Haven, CT 06510

BY CERTIFIED MAIL, RESTRICTED DELIVERY, RETURN RECEIPT REQUESTED

In Re: Thomas Melone; PRB File No. 25-120

Dear Mr. Melone:

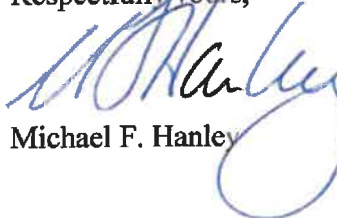
I write in my capacity as Conflict Disciplinary Counsel in this matter.

On September 4, 2025, a Probable Cause Hearing Panel ruled that there was probable cause to conclude that you violated the Vermont Rules of Professional Conduct.

I enclose a copy of the *Notice of Probable Cause Decision*.

I enclose a copy of the *Petition of Misconduct*.

Respectfully yours,



Michael F. Hanley

MFH/shg
Enclosures

EXHIBIT 2



TRACKING-NUMBERS
9589 0710 5270 1986 5167 97

TRACK STATUS OF ITEMS WITH THIS CODE
(UP TO 25 ITEMS)



TRACK STATUS BY TEXT MESSAGE
Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

TRACK STATUS ONLINE
Visit <https://www.usps.com/tracking>
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
First-Class Mail®	1		\$3.28
Large Envelope			
New Haven, CT 06510			
Weight: 0 lb 6.40 oz			
Estimated Delivery Date			
Mon 09/08/2025			
Restricted Del			\$13.70
Recipient name			
THOMAS M MELONE			
Tracking #:			
9589 0710 5270 1986 5167 97			
Return Receipt			\$4.40
Tracking #:			
9590 9402 0015 3156 0123 18			
Total			\$21.38

Grand Total: \$21.38

Credit Card Remit \$21.38
Card Name: VISA
Account #: XXXXXXXXXXXXXXX3466
Approval #: 06604I
Transaction #: 049
AID: A0000000031010 Contactless
AL: VISA CREDIT

TO REPORT AN ISSUE
Visit <https://email.us.usps.com>

PREVIEW YOUR MAIL AND PACKAGES
Sign up for FREE at
<https://informedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only
Thank you for your business.

Customer Service
1-800-ASK-USPS
(1-800-275-8777)

Agents do not have any additional

9589 0710 5270 1986 5167 97

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

NEW NUMBER: 3800

OFFICIAL USE

Certified Mail Fee		Postmark Here
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Return Receipt (electronic)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
Postage	\$ 13.70	09/08/2025
Total Postage and Fees	\$ 21.38	
Sent To		
Street and Apt. No., or PO Box No.		
City, State, ZIP+4®		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

EXHIBIT 3

Michael F. Hanley

From: Michael F. Hanley
Sent: Thursday, September 25, 2025 2:16 PM
To: Thomas Melone
Subject: Professional Responsibility Program
Attachments: 2025-09-04 PRB-120-2025 - Melone - Notice of Probable Cause Decision -25-0904, 4902-0878-6790.1.pdf; 2025-09-05 Petition of Misconduct (Thomas Melone), 4909-6679-4343.1.pdf; 2025-09-05 Thomas Melone, 4912-9650-6215.1.pdf

Importance: High

Dear Mr. Melone:

Pursuant to Rule 11(d)(1) I sent you a letter dated September 5, 2025 enclosing copies of a Notice of Probable Cause Decision and a Petition of Misconduct. The letter was sent to the address shown on your last licensing statement. The letter was sent by Certified Mail, Restricted Delivery, Return Receipt Requested.

I enclose copies of my letter, the Notice of Probable Cause Decision, and the Petition of Misconduct.

Under Rule 11(D)(3), your answer is due within 20 days of the service of the Petition.

Michael F. Hanley
Plante & Hanley, P.C.
P.O. Box 708
White River Junction, VT 05001
802-295-3151, Ext. 102
mghanley@plantehanley.com

EXHIBIT 4

Michael F. Hanley

From: Thomas Melone <thomas.melone@gmail.com>
Sent: Thursday, September 25, 2025 2:34 PM
To: Michael F. Hanley
Subject: Re: Professional Responsibility Program

I just received this. **I need additional time to respond**

Thomas Melone
Chief Executive Officer
Allco Renewable Energy Inc
157 Church St., 19th floor
New Haven, CT 06510

(212) 681-1120
(801) 858-8818 (fax)

This e-mail communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this e-mail in error by replying to the e-mail or by telephoning (212) 681-1120. Please then delete the e-mail and any copies of it. Thank you

On Thu, Sep 25, 2025 at 2:16 PM Michael F. Hanley <mfhanley@plantehanley.com> wrote:

Dear Mr. Melone:

Pursuant to Rule 11(d)(1) I sent you a letter dated September 5, 2025 enclosing copies of a Notice of Probable Cause Decision and a Petition of Misconduct. The letter was sent to the address shown on your last licensing statement. The letter was sent by Certified Mail, Restricted Delivery, Return Receipt Requested.

I enclose copies of my letter, the Notice of Probable Cause Decision, and the Petition of Misconduct.

Under Rule 11(D)(3), your answer is due within 20 days of the service of the Petition.

Michael F. Hanley

Plante & Hanley, P.C.

P.O. Box 708

White River Junction, VT 05001

802-295-3151, Ext. 102

mfhanley@plantehanley.com



This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

EXHIBIT 5

Michael F. Hanley

From: Thomas Melone <thomas.melone@gmail.com>
Sent: Thursday, September 25, 2025 3:42 PM
To: rshems@tgrvt.com; ron@tarrantgillies.com
Cc: Michael F. Hanley
Subject: In Re Thomas Melone, PRB File No. 25-120

Attorney Shems,

I request an extension to respond to the Petition for Misconduct dated September 4, 2025 in the above captioned matter. I did not receive the hard copy of the Petition that Attorney Hanley mailed on September 5, 2025. The first time that I became aware of the petition was today when Attorney Hanley emailed it to me.

I request an extension to October 2, 2025. Attorney Hanley does not object to the requested extension.

Respectfully,

Thomas Melone
Chief Executive Officer
Allco Renewable Energy Inc
157 Church St., 19th floor
New Haven, CT 06510

(212) 681-1120
(801) 858-8818 (fax)

This e-mail communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this e-mail in error by replying to the e-mail or by telephoning (212) 681-1120. Please then delete the e-mail and any copies of it. Thank you



This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

EXHIBIT 6

Tracking Number:

Remove X

9589071052701986516797

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Moving Through Network

In Transit to Next Facility, Arriving Late

September 17, 2025

Arrived at USPS Regional Destination Facility

HARTFORD CT DISTRIBUTION CENTER

September 13, 2025, 4:31 pm

See All Tracking History

Feedback

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

Tracking Number:

Remove X

9589071052701986516797

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Moving Through Network

In Transit to Next Facility, Arriving Late

September 17, 2025

Arrived at USPS Regional Destination Facility

HARTFORD CT DISTRIBUTION CENTER

September 13, 2025, 4:31 pm

Forward Expired

NEW HAVEN, CT 06510

September 8, 2025, 2:38 pm

Departed USPS Regional Facility

SPRINGFIELD MA DISTRIBUTION CENTER

September 8, 2025, 5:36 am

Arrived at USPS Regional Facility

SPRINGFIELD MA DISTRIBUTION CENTER

September 7, 2025, 10:54 pm

Departed USPS Regional Facility

HARTFORD CT DISTRIBUTION CENTER
September 6, 2025, 11:11 pm

Arrived at USPS Regional Destination Facility
HARTFORD CT DISTRIBUTION CENTER
September 6, 2025, 8:57 pm

Departed Post Office
WHITE RIVER JUNCTION, VT 05001
September 5, 2025, 5:42 pm

USPS in possession of item
WHITE RIVER JUNCTION, VT 05001
September 5, 2025, 12:39 pm

Hide Tracking History

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Thomas Melone
PRB File No. 25-120

CERTIFICATE OF SERVICE

I certify that on September 26, 2025 I filed *Conflict Disciplinary Counsel's Motion for Service by Email* with the Professional Responsibility Program by depositing the same in the United States Mail, postage prepaid, First Class, addressed to:

Merrick Grutchfield, Program Administrator
109 State Street
Montpelier, VT 05609-0701

and also by sending the same to her via email at:

merrick.grutchfield@vermont.gov

with copies to the Respondent via United States Mail, postage prepaid, First Class, addressed to:

Thomas M. Melone
157 Church Street, 19th floor
New Haven, CT 06510

the address shown on his last licensing statement and by email to:

Thomas.Melone@gmail.com

Dated: September 26, 2025

/s/Michael F. Hanley
Michael F. Hanley
Conflict Disciplinary Counsel