

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

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

**DISCOVERY CERTIFICATE**

I certify that on October 1, 2025, I sent the following documents by email to Thomas Melone at thomas.melone@AllcoUS.com and thomas.melone@gmail.com.

<b>Bates No.</b>	<b>Description</b>	<b>Document No.</b>
000659-000665	Professional Misconduct Complaint Against Thomas Melone and Michael Melone by Merrill Bent	4899-0320-8788
000001-000004	Complaint Exhibit 1; Emails between Thomas Melone and Merrill Bent regarding Thomas Melone emailing Town of Bennington officials	4935-2943-7769
000005-000013	Complaint Exhibit 2; Town of Bennington's 02/27/2025 Motion to Dismiss (PLH Vineyard Sky LLC v. Town of Bennington)	4925-0760-0713
000014	Complaint Exhibit 3; Environmental Court's 02/28/2025 Order Granting Motion for Expedited Review	4922-9932-7561
000015-000017	Complaint Exhibit 4; Apple Hill Solar's Preliminary Comments of the Department of Public Service's Motion to Stay - PUC Filing	4920-5120-9545

000018-000021	Complaint Exhibit 5; PLH Vineyard Sky LLC's 01/26/2025 letter to Bennington Select Board regarding Benn High Meeting and alleging violations of Professional Rules of Conduct	4897-2625-4409
000022-000035	Complaint Exhibit 6; Apple Hill Solar's January 29, 2025 Response to the Town of Bennington's Motion to Strike - (PUC)	4927-2039-8153
000036-000041	Complaint Exhibit 7; Michael Melone's February 14, 2025 email to Merrill Bent attaching PLH Vineyard Sky's Notice of Appeal Environmental Court	4932-0634-8105
000042-000057	2025-04-23 Email from Thomas Melone to Merrill Bent (000042) Enclosing Complaint for Defamation, Injurious Falsehood, and Violation of Civil Rights (000043-000049) and Thomas Melone's Response to the Complaint (000050-000057)	4929-6740-4105
000061	Merrill Bent's May 2, 2025 email to Thomas Melone instructing him to direct all communication to her and telling him to stop communicating with her client Apple Hill Solar LLC v. Bennington	4920-7421-4473
000062-000065	Thomas Melone's May 19, 2025 email to Town of Bennington officials attaching the subpoena to U.S. Bancorp Community Development Corporation	4899-8092-9353
000066-000069	Thomas Melone's May 21, 2025 email to Town of Bennington officials attaching subpoena for Evernorth Inc.	4908-3977-8633

000070-000071	Thomas Melone's May 3, 2024 email to Maru Leon and David Griffin regarding their bankruptcy petition	4927-5428-1801
000072-000073	Thomas Melone's November 20, 2024 email to Maru Leon and David Griffin demanding they support the solar projects in exchange for them not being deposed	4925-0635-9113
000074-000076	Apple Hill Solar's Preliminary Comments of the Department of Public Service's Motion to Stay - PUC Filings - January 20, 2025	4933-8198-5609
000077-000176	Apple Hill Solar's Further Comments on the Department of Public Service's Motion to Stay - PUC Filings - January 12, 2025	4920-1143-1497
000177-000184	Thomas Melone's February 3, 2025 email to Merrill Bent and Town of Bennington officials saying Ms. Bent's communications are not protected by the attorney-client privilege	4899-3728-2633
000185-000200	Michael Melone's February 6, 2025 email to Stuart Hurd, Dan Monks, Merrill Bent, and Jonah Spivak appealing of the Town's decision to withhold communications from the Town to Merrill Bent concerning the Chelsea and Apple Hill Solar projects	4921-0337-8505
000201-000202	Merrill Bent's February 11, 2025 letter to Michael Melone regarding appeal email dated February 6, 2025	4896-4237-0633

000203-000204	Merrill Bent's January 9, 2025 letter to the Public Utility Commission regarding initial comments with respect to the Petition for Certificate of Public Good Case No. 24-3517-PET	4934-6941-1145
000205-000206	Town of Bennington's Motion to Strike PUC Filing - January 15, 2025	4902-1148-5513
000207-000236	Apple Hill Solar's Response to the Town of Bennington's Motion to Strike PUC Filing - January 29, 2025	4935-2157-8057
000237-000246	Town of Bennington's Reply Memorandum in Support of Motion to Strike PUC Filing - February 11, 2025	4934-3985-4665
000247-000255	May 5, 2025 Order regarding Motions for Stay and Motion to Strike (Granted)	4935-1050-2473
000256-000276	PLH Vineyard Sky LLC's Complaint against the Town of Bennington - May 2, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division	4925-6993-0057
000277-000283	The Town of Bennington's Emergency Motion to Stay Discovery - May 20, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4921-3732-6921

000284-000285	Exhibit A to Town of Bennington's Emergency Motion to Stay Discovery - PLH Vineyard Sky's Application for Issuance of Foreign Subpoena to U.S. Bancorp Community Development Corporation PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4899-2686-3177
000286	Exhibit B to Town of Bennington's Emergency Motion to Stay Discovery - Thomas Melone's May 19, 2025 email to Town of Bennington officials attaching subpoena to U.S. Bancorp Community Development Corporation PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4917-4201-4025

Dated: October 1, 2025

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