

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re Thomas Melone

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PRB No. 25-120

**RESPONDENT’S SECOND A.O. 9, RULE 16F(1)(a) MOTION**

Administrative Order No. 9, Rule 16F provides:

**F. Request for Nonpublic Information.**

**(1) Requesting Agency.** A request for nonpublic information shall be denied unless the request is from one of the following agencies:

**(a)** A lawyer or judicial admission or disciplinary agency of this or another jurisdiction; or

**(b)** Any agency or person to which the attorney has submitted a waiver of confidentiality.

**(2) Notice to Lawyer.** If the Board or hearing panel decides to provide nonpublic information requested, and if the lawyer has not signed a waiver permitting the requesting agency to obtain nonpublic information, the lawyer shall be notified in writing at the lawyer’s last known address of that information which has been requested and by whom. The notice shall advise the lawyer that the information shall be released at the end of twenty-one (21) days following mailing of the notice unless the lawyer obtains a Court order to prevent such disclosure.

Respondent requests that he be sent *all nonpublic information (including without limitation, all documents, emails and electronic messages) related to PRB No. 25-120 in the possession or control of the Professional Responsibility Board, Michael Hanley, Paul Perkins, Carolyn Anderson, Andrew Strauss, and/or Jon Alexander.* Respondent believes that he is entitled to that information under both clause (a) and (b) of Rule 16F(1). As to entitlement under Rule 16F(1)(a), Respondent is a “lawyer ... of this or another jurisdiction.” As to entitlement under Rule 16F(1)(b), Respondent is a “person to which the attorney has submitted a waiver of confidentiality.” Respondent has submitted a waiver of confidentiality to himself and hereby confirms to the Hearing Panel that he waives confidentiality of the requested information. This request excludes the information already provided by Michael Hanley that is listed on discovery certificates that he has filed in this case.

Respondent hereby respectfully requests that the Hearing Panel approve the release of the requested information to Respondent.

Dated: January 28, 2026

Respectfully Submitted,

/s/ Thomas Melone

Thomas Melone

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