

**STATE OF VERMONT  
BEFORE THE PROFESSIONAL RESPONSIBILITY BOARD**

In Re THOMAS MELONE,  
(Thomas Melone, Respondent)

PRB File No. 25-120

February 9, 2026

**RESPONDENT'S REPORT PURSUANT TO THE HEARING PANEL'S ORDER OF  
JANUARY 20, 2026 REGARDING CERTAIN MOTIONS TO QUASH**

Respondent THOMAS MELONE ("Respondent") hereby submits this report pursuant to paragraph 2 of the Hearing Panel's order of January 20, 2026, regarding Mr. Hanley's motions to quash the subpoenas issued to JAMES SULLIVAN, JEANETTE JENKINS, SHANNON BARSOTTI and DAN MONKS (collectively, the Bennington Recipients") and to Edward McNamara.

A meet and confer teleconference was held on January 30, 2026. In attendance were Respondent, Mr. Hanley and David Groff, assistant attorney general appearing on behalf of Mr. McNamara. During the teleconference, the participants discussed the subpoena issued to Mr. McNamara and the subpoena issued to Mr. Hanley. Inadvertently, the participants did not discuss Mr. Hanley's motion to quash the subpoena issued to the Bennington Recipients.

As to the discussion regarding the subpoena to Mr. Hanley, Respondent will file a separate report. As to the discussion regarding the subpoena to Edward McNamara, there was no progress. Mr. Groff made it clear that Mr. McNamara will not produce any further information in response to the subpoena.

As to the Bennington Recipients, Respondent sent the following email today to Mr. Hanley:

Good morning Mr. Hanley,  
I just realized that on our meet and confer call last Friday, we did not discuss your motion to quash the subpoenas to four people from bennington. We are supposed to report back to the hearing panel today.

May I report back that you have withdrawn the motion and do not intend to refile it?

Or do you wish to have another meet and confer regarding your motion to quash  
Mr. Hanley responded:

Mr. Melone:

No, you may not inform the panel that I have withdrawn any motion.

No, I do not wish to have another meet and confer with you.

See Exhibit 1.

Dated: February 9, 2026

Respectfully submitted,

/s/Thomas Melone

Thomas Melone

601 S. Ocean Blvd.

Delray Beach, FL 33483

Telephone: (212) 681-1120

Facsimile: (801) 858-8818

[Thomas.Melone@AllcoUS.com](mailto:Thomas.Melone@AllcoUS.com)

# **EXHIBIT 1**

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**PRB 120-2025**

Michael F. Hanley <mphanley@plantehanley.com>  
To: Thomas Melone <thomas.melone@gmail.com>

Mon, Feb 9, 2026 at 11:02 AM

Mr. Melone:

No, you may not inform the panel that I have withdrawn any motion.

No, I do not wish to have another meet and confer with you.

Michael F. Hanley  
Plante & Hanley, P.C.  
P.O. Box 708  
White River Junction, VT 05001  
802-295-3151, Ext. 102  
[mphanley@plantehanley.com](mailto:mphanley@plantehanley.com)

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From: Thomas Melone <thomas.melone@gmail.com>  
Sent: Monday, February 9, 2026 10:28 AM  
To: Michael F. Hanley <mphanley@plantehanley.com>  
Subject: PRB 120-2025

Good morning Mr. Hanley,

I just realized that on our meet and confer call last Friday, we did not discuss your motion to quash the subpoenas to four people from bennington. We are supposed to report back to the hearing panel today.

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Or do you wish to have another meet and confer regarding your motion to quash

Tom

Thomas Melone  
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