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NORTHERN DISTRICT OF NEW YORK

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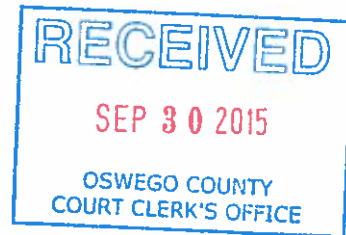
Lisa Peebles, Federal Public Defender

September 30, 2015

VIA FAX – 376-1656

Hon. Daniel King
Acting Oswego County Court Judge
Lewis County Courthouse
7660 State Street
Lowville, NY 13367

**RE: PEOPLE V. GARY THIBODEAU
INDICTMENT NUMBER 94-161**




Dear Judge King,

I am writing to request the Court to allow the defense to call an additional witness, Rhonda Burr, in support of our claim that Heidi Allen was a confidential informant and that the prosecution purposely suppressed such information at the time of Gary Thibodeau's trial.

On September 30, 2015, I received a telephone call from Rhonda Burr. Ms. Burr was a co-worker with Heidi Allen at the D & W Convenience store from 1992 to 1994 and quit three weeks before Heidi Allen disappeared. During that time Ms. Allen personally spoke with Ms. Burr about being a confidential informant. Heidi Allen told Ms. Burr what the Sheriff's Department was requesting her to do and her fears regarding being involved in such activities. See attached affidavit of Rhonda Burr. Ms. Burr's testimony further serves to undermine the testimony given at our recent post-verdict hearing wherein the People alleged that Ms. Allen was not working as an informant and that she was not providing direct information concerning drug activities.

Very truly yours,
OFFICE OF THE FEDERAL PUBLIC DEFENDER

By: 
Lisa Peebles, Esq.
Federal Public Defender



cc: Oswego County District Attorney's Office (Fax #349-3212)

Brett Law but I do know Heidi was concerned about informing on "coke" people.


I never said anything to the Sheriff's investigators about Heidi's informant status because I figured they obviously knew about since she was working for them and I certainly did not want to put myself in jeopardy. I am only coming forward now because Brett Law brought my name up and I thought I should disclose what Heidi told me.

Rhonda Burr

Rhonda Burr

Sworn to me this 30th

day of September 2015



Notary Public

LISA A. PEBBLES
Notary Public, State of New York
Qualified in Onondaga County
Reg. #02PE5021239
My Commission Expires Dec. 13, 2017