

5. In its reporting, the Manchester Police Department disclosed that on October 9, 2020, the Vermont Superior Court, Criminal Division, Bennington Unit found probable cause that Respondent engaged in three counts of domestic assault and three counts of cruelty to a child and reckless endangerment.

6. The Subcommittee reviewed and processed the complaint pursuant to 20 V.S.A. Chapter 151, Subchapter 2.

7. The Subcommittee determined that the facts established by the investigation of the complaint supported a finding of unprofessional conduct and, by vote on November 29, 2021, concluded that Respondent had engaged in Category A conduct.

8. On January 12, 2023, Respondent signed a Stipulation of Facts that was filed as part of a plea agreement in Case No. 20-CR-02129. By signing the Stipulation of Facts, Respondent is admitting to one count of Reckless Endangerment, one count of Simple Assault and one count of Cruelty to a Child. A true and accurate copy of this agreement is attached to this Stipulation and Consent Order and is incorporated herein by reference.

Conclusions of Law

9. Vermont law sets forth three categories of law enforcement officer unprofessional conduct: Category A, Category B and Category C. *See* 20 V.S.A. § 2401(1)-(3) (categories defined).

10. As relevant to this matter, Category A conduct is defined as felonies, misdemeanors “committed while on duty and did not involve the legitimate performance of duty” and specifically identified misdemeanors committed while off-duty. *Id.* § 2401(1). Category A conduct specifically includes “domestic assault.” *Id.* § 2401(1)(c)(ii); *see also* 13 V.S.A. § 1042 (“Any person who attempts to cause or willfully or recklessly causes bodily injury to a family or household member or willfully causes a family or household member to fear imminent serious bodily injury shall be imprisoned not more than 18 months or fined not more than \$5,000.00, or both”).

11. The State alleges that Respondent engaged in Category A conduct by virtue of the conduct identified in the attached Stipulation of Facts.

12. Respondent acknowledges that if this matter were to proceed to a contested hearing, the State could prove that Respondent engaged in the conduct identified in Paragraph 8 above.

13. Consistent with Respondent’s cooperation with the Council, Respondent acknowledges that if the State were to file charges it could satisfy its burden at a hearing and a finding adverse to Respondent could be entered by the Council pursuant to 20 V.S.A. §§ 2401, 2405-2407 and 3 V.S.A. § 812.

14. In the interest of resolving this matter, the Respondent and the State agree to enter this Stipulation and Consent Order, in lieu of proceeding to hearing.

15. The Council adopts as its facts and conclusions in this matter Paragraphs 1 through 8 above, and Respondent agrees that this is an adequate basis for the Council actions set forth herein. Any representation by Respondent herein is made solely for the purposes set forth in this agreement.

16. Therefore, in the interest of Respondent’s desire to fully and finally resolve the matter presently before the Council, Respondent has determined that Respondent shall enter into

this agreement with the Council. Respondent enters no further admissions here, but to resolve this matter without further time, expense, and uncertainty Respondent has concluded that this agreement is acceptable and in the best interest of the parties.

17. Respondent agrees and understands that by executing this document Respondent is waiving any right to challenge the jurisdiction and continuing jurisdiction of the Council in this matter, to be presented with a specification of charges and evidence, to cross-examine witnesses, to offer evidence of his own to contest any allegations by the State or to appeal from this Stipulation and Consent Order.

18. Respondent is not under the influence of any drugs or alcohol at the time he signs this Stipulation and Consent Order

19. The parties agree that upon the Council's acceptance of this Stipulation and Consent Order, and pursuant to the terms herein, the above-captioned matter shall be resolved by the Council. Thereafter, the Council will take no further action as to this matter absent non-compliance with the terms and conditions of this document by Respondent.

20. This Stipulation and Consent Order is conditioned upon its acceptance by the Council. If the Council rejects any part of this document, the entire agreement shall be considered void. Respondent agrees that if the Council does not accept this agreement in its current form, Respondent shall not assert in any subsequent proceeding any claim of prejudice from any such prior consideration. If the Council rejects any part of this agreement, none of its terms shall bind Respondent or constitute an admission of any of the facts of the alleged misconduct, it shall not be used against Respondent in any way, it shall be kept in strict confidence, and it shall be without prejudice to any future unprofessional conduct disciplinary proceeding and the Council's final determination of any charge against Respondent.

21. Respondent acknowledges and understands that this Stipulation and Consent Order shall be a matter of public record, shall be entered in his permanent Council file, shall constitute an enforceable legal agreement, and may and shall be reported to other authorities, including the International Association of Law Enforcement Standards and Training National Decertification Index. In exchange for the actions by the Council, as set forth herein, Respondent expressly agrees to be bound by all terms and conditions of this Stipulation and Consent Order.

22. The parties therefore jointly agree that should the terms and conditions of this Stipulation and Consent Order be deemed acceptable by the Council, it may enter an order implementing the terms and conditions herein.

Order

WHEREFORE, on the basis of the foregoing Findings of Fact and Conclusions of Law, and on the basis of the consent of Respondent, it is hereby ORDERED that:

1. Respondent's Vermont law enforcement officer certification shall be PERMANENTLY REVOKED effective January , 24, 2023, with no option of recertification.
2. Respondent shall provide a complete copy of this Stipulation and Consent Order to any Vermont law enforcement agency for whom he works or to any prospective Vermont law enforcement agency to whom he makes application for employment, as well as to any state regulatory body or other certification authority related to law enforcement officers in any location or jurisdiction where he may apply for law enforcement officer employment, for so long as this Stipulation and Consent Order remains in effect.
3. Respondent shall bear all costs of complying with the terms and conditions of this Stipulation and Consent Order.

4. Respondent agrees to be bound by all terms and conditions of this Stipulation and Consent Order.

DATED at Manchester, Vermont this 24th day of January, 2023.

By: *Christopher L. Mason*
Christopher L. Mason (Jan 24, 2023 11:22 EST)
Respondent

DATED at Manchester, Vermont, this 19th day of January, 2022.

By: *DM*
Daniel M. McManus, Esq.
Counsel for Respondent

DATED at City, Vermont this Day day of Month 20YY.

By: *Heather Simons*
DocuSigned by:
E8DFF4DE620540A...
Executive Director







VTCJTC Stip-Mason

Final Audit Report

2023-01-24

Created:	2023-01-24
By:	Dan McManus (dan@danmcmanuslaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAC_hLGG8KWUtGgrl3KzR5JM9fRrK-ADWm

"VTCJTC Stip-Mason" History

-  Document created by Dan McManus (dan@danmcmanuslaw.com)
2023-01-24 - 4:05:36 PM GMT- IP address: 24.147.179.49
-  Document emailed to crjmaso@gmail.com for signature
2023-01-24 - 4:06:30 PM GMT
-  Email viewed by crjmaso@gmail.com
2023-01-24 - 4:16:06 PM GMT- IP address: 74.125.215.43
-  Signer crjmaso@gmail.com entered name at signing as Christopher L. Mason
2023-01-24 - 4:22:49 PM GMT- IP address: 107.115.17.35
-  Document e-signed by Christopher L. Mason (crjmaso@gmail.com)
Signature Date: 2023-01-24 - 4:22:51 PM GMT - Time Source: server- IP address: 107.115.17.35
-  Agreement completed.
2023-01-24 - 4:22:51 PM GMT