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August 10, 2015

VIA HAND DELIVERY

Vermont Superior Court  
Criminal Division – Washington Unit  
255 N. Main St.  
Barre, VT 05641

Re: State of Vermont v. Steven Jalbert, Docket No. Wrcr

Dear Sir/Madam Clerk:

Enclosed for filing with the Court in the above-referenced case against Mr. Jalbert, please find the following:

1. Information by Attorney General with the supporting Affidavit of Probable Cause.
2. Criminal Record Check.
3. State's Proposed Conditions of Release.
4. Copy of Packet for Defendant

Please send all notices of hearing and correspondence in this case to John Treadwell and Sarah Katz at the Criminal Division of the Vermont Attorney General's Office, 109 State St., Montpelier, Vermont 05609-1001.

Thank you, and please contact me if you need any further information at 802-828-5512.

Sincerely,

A handwritten signature in black ink, appearing to be "SK" or "Sarah Katz", written in a cursive style.

Sarah Katz  
Assistant Attorney General

Enc.

STATE OF VERMONT

SUPERIOR COURT  
WASHINGTON UNIT

CRIMINAL DIVISION  
Docket No. Wrcr

STATE OF VERMONT

v.

STEVEN JALBERT

INFORMATION BY ATTORNEY GENERAL

BY THE AUTHORITY OF THE STATE OF VERMONT, the Attorney General for the State of Vermont, upon his oath of office, charges:

COUNT 1 of 2

CHARGE CODE:13V2304, CHARGE NAME: MANSLAUGHTER  
OFFENSE CLASS: F

On May 9, 2014, Steven Jalbert of Barre, Vermont, at Barre, Vermont, was a person who acted with criminal negligence and caused the death of another, to wit; acted with criminal negligence in conducting a motor vehicle safety inspection causing the death of Elizabeth Ibey on July 5, 2014, in violation of 13 V.S.A. § 2304, and against the peace and dignity of the State.

PENALTY: Pursuant to 13 V.S.A. § 2304, imprisonment for not less than one year nor more than 15 years, or a fine of not more than \$3,000, or both.

COUNT 2 of 2

CHARGE CODE:13V1025, CHARGE NAME: RECKLESS ENDANGERMENT,  
OFFENSE CLASS: M

On May 9, 2014, Steven Jalbert of Barre, Vermont, at Barre, Vermont, was then and there a person who committed the crime of reckless endangerment, to wit; placed Donald and Elizabeth Ibey in danger of death or serious bodily injury in recklessly conducting a motor vehicle safety inspection, in violation of 13 V.S.A. § 1025, and against the peace and dignity of the State.

PENALTY: Pursuant to 13 V.S.A. § 1025, imprisonment for not more than one year , or a fine of not more than \$1,000, or both.

Dated this 10th day of August 2015.

STATE OF VERMONT

Office of the  
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GENERAL  
109 State Street  
Montpelier, VT  
05609

WILLIAM H. SORRELL  
ATTORNEY GENERAL

by: 

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ERN 4487

This information was presented to me and I have found probable cause this \_\_\_\_\_  
day of \_\_\_\_\_ 2015.

\_\_\_\_\_  
Superior Judge

Office of the  
ATTORNEY  
GENERAL  
109 State Street  
Montpelier, VT  
05609

Incident #: 14MV006245

**VERMONT DEPARTMENT OF MOTOR VEHICLES  
AFFIDAVIT OF PROBABLE CAUSE**

**STATE OF VERMONT**

**SUPERIOR COURT  
WASHINGTON UNIT**

**Criminal Division  
Docket No. Wncr**

**State of Vermont**

**v.**

**Steven P. Jalbert (DOB 11/14/1984), Defendant**

Now comes Tim F. Charland, affiant, being duly sworn and on oath deposes and says he has probable cause to believe that Steven P. Jalbert, has committed the crime of Involuntary Manslaughter, in violation of Title 13 V.S.A. 2304 and Reckless Endangerment, in violations of Title 13 V.S.A. 1025.

1. I have been a Vermont Certified Law Enforcement Officer since March, 1989. I was employed with the Burlington City Police Department for twenty-three years. During my tenure with the Burlington Police, I served in the capacity of Patrol Officer, Detective, Patrol Sergeant and a Patrol Lieutenant Watch Commander. I retired from the Burlington Police in November, 2011, after serving my last five years as the Detective Lieutenant, in charge of the Department's Detective Services Bureau, supervising major crimes to include all causes and manners of death. I am a 2005 Graduate of the FBI National Academy. Since November 2011, I have been employed with the Enforcement & Safety Division of the Vermont Department of Motor Vehicles (DMV) in the capacity of Detective Lieutenant, supervising the Northern Investigations Unit. While employed with DMV, I have received various supervisory trainings; training in advanced roadside impaired driving enforcement (ARIDE) and I have been certified as a Vermont State Inspection Mechanic.
2. The purpose for a Vermont State Vehicle Safety Inspection is to ensure that registered vehicles are in a safe condition to be operated on the public highways of the State. Vermont registered vehicles must comply with current Federal Motor Vehicle Safety Standards. Vermont has had a Vehicle Safety Inspection Program since 1935. All original factory installed equipment, or its approved after-market equivalent designed to enhance safety, must be operational at the time of inspection. Inspection Stations are appointed and mechanic's certifications are issued solely for the benefit of the motoring public. All appointments are provisional and are conditional upon compliance with departmental regulations as specified in the Vermont Periodic Inspection Manual. It is the responsibility of the inspection station owner and operators to maintain the Periodic Inspection Manual in an up-to-date manner at all times for the use of inspection personnel and to examine all correspondence immediately upon arrival from DMV in order to keep informed of relevant applicable regulations. DMV's Enforcement & Safety Division is

tasked with licensing inspection stations, certifying inspection mechanics and investigating/regulating them to ensure compliance with the rules and regulations as outlined in the Vermont Periodic Inspection Manual are followed and correct/appropriate vehicle safety inspections are conducted for the general welfare and safety of the motoring public.

3. Updated Vermont Periodic Inspection Manuals were issued in 2004, 2007, 2011 and most recently, 2013. Under the 2013 version of the Vermont Periodic Inspection Manual, numerous vehicle components must be examined during a vehicle safety inspection under a pass/fail criterion. Pursuant to the 2013 Manual, the inspection had to include various elements including:
  - Take the vehicle on a road test to test brake performance and steering performance.
  - Place the vehicle on a lift to inspect/examine the undercarriage, floor pan, frame rails, unibody construction and rocker panels for severely rusted areas and rusted out areas displaying holes which may permit exhaust gases from entering the vehicle or not support occupant's safety. Also inspect/examine brake lines, other brake component, indications of fluid leakage, etc.
  - Remove a tire from the vehicle to inspect/examine braking components
  - Conduct a 150 lb. PSI brake test designed to test the brake system integrity to withstand such force.
  - Examine body exterior components for rust holes and jagged metal
4. On or about Wednesday, August 6, 2014, I received a phone call from Barry Ibey DOB 01/03/1959, requesting an investigation into a July 5, 2014, motor vehicle collision involving his father (Donald Ibey, DOB 12/17/1928), in which his eighty-three year old mother, a passenger in the vehicle, died. He explained the accident occurred when his father was driving down a very steep hill in Barre, Vermont. Ibey stated his father said the brakes "gave out" on the vehicle he was operating, causing the vehicle to accelerate down the hill and ultimately strike a tree stump. Ibey said he had spoken to the wrecker operator who towed his father's vehicle from the scene and the wrecker operator said he observed brake fluid in the roadway in the area his father said the brakes "gave out." Ibey further advised the wrecker operator identified frame rot on his father's car as well, and that his father's vehicle should never have passed the recent safety inspection.
5. I learned from Barry Ibey that the Barre City Police Department had conducted an accident investigation and determined the cause of the accident to be "operator error" and that his father's car was examined by a mechanic at the Barre City Garage. The Barre City mechanic determined there was nothing wrong with the brakes on his father's vehicle. Ibey was adamant that his father was certain the brakes on the vehicle "gave out" after depressing the brake pedal and hearing a "loud pop", just as the brakes were lost. Ibey said his father was very upset over losing his wife and did not yet know about the accident investigation findings. Ibey requested we conduct a secondary investigation to verify Barre City Police findings, before the results were told to his eighty-six year old father. Ibey

described his father's vehicle to be a 1992 Chevrolet Corsica, bearing a red 6 inspection sticker. He further identified his father as Donald Ibey, DOB 12/17/1928.

6. I then contacted Chief Tim Bombardier of the Barre City Police Department and explained the call I received from Barry Ibey. Chief Bombardier explained their investigation had determined the cause of the accident was most likely the result of Donald Ibey depressing the clutch pedal, rather than the brake pedal, when the car was traveling down Hill Street in Barre. Chief Bombardier related the vehicle struck a stump, killing passenger Elizabeth Ibey. Chief Bombardier said Barre City Mechanic \_\_\_\_\_ examined the vehicle and determined there was nothing wrong with the vehicle's braking system.
7. On August 11, 2014, I spoke to DMV Investigator David Evans by phone, explaining the circumstances of this investigation. I assigned him as lead investigator to determine the mechanical condition of the Ibey vehicle, whether or not any violations occurred as a result of the recent safety inspection conducted on the Ibey vehicle and if the vehicle's condition contributed to the cause of the accident and possibly to the death to Elizabeth Ibey.
8. On August 12, 2014, at approximately 1300 hours, Investigator Evans met with Chief Tim Bombardier and Barre City Police Officer Jonathon Houle - the investigating officer for this accident. Officer Houle advised Investigator Evans that the operator, Donald Ibey, was travelling down Hill Street when the accident occurred. Houle stated that Ibey told him he had attempted to apply his brakes as he was traveling down the hill and that he heard a loud "pop" and his brake pedal went to the floor. Houle said he saw at the scene a small spot of a liquid substance in the roadway which he believed to be brake fluid, in the area where the vehicle left the roadway. Investigator Evans said Chief Bombardier advised they had asked the Barre City Highway Department Mechanic, \_\_\_\_\_, to inspect the Ibey vehicle. \_\_\_\_\_ had informed Barre City Police that the brakes were in working order and \_\_\_\_\_ believed that the operator had depressed the clutch pedal rather than the brake pedal.
9. On August 12, 2014, at approximately 1000 hours, Investigator Evans spoke to Tom Stacy, the owner of Action Towing. Stacy stated that he had been the wrecker operator on the scene the day of the accident and that he observed the rocker panels of Ibey's vehicle were severely rusted. Stacey said that when he moved the vehicle he saw a small puddle of fluid on the ground he believed to be brake fluid.
10. On August 12, 2014, at approximately 1130 hours, Investigator Evans traveled to the Barre City Impound Lot to view Ibey's vehicle. He located the vehicle and verified that it was the same one involved in the crash by both VIN number and Vermont registration plates. He observed the vehicle was displaying a red "6" inspection sticker. The sticker affixed to the vehicle was number 14-232284. Investigator Evans checked the back of the sticker, and found it had been inspected at station 1531. Investigator Evans made the following observations: The vehicle suffered extensive damage in the crash. The right engine cradle had buckled as a result of the collision and there was extensive damage to the right side, hood and roof of the vehicle. The driver's air bag had deployed - The vehicle is not equipped with passenger side air bag. The metal from the right side rocker panel was hanging below the right side of the vehicle and showed signs of extensive rust. The brake pedal went to the floor of the vehicle with little to no resistance. Investigator Evans then contacted the Inspections Unit at the Department of Motor Vehicles and spoke with

Inspection Clerk Rose Kidder and learned Station 1531 is assigned to AJ's Sunoco located at 320 Washington Street, Barre, Vermont. DMV records indicate that AJ's Sunoco has been a licensed State Inspection Station since 2004.

11. On August 12, 2014, at approximately 1330 hours, Investigator Evans went to the DMV Inspection Office, where he obtained a copy of the inspection log sheet for Station 1531 which included the records for sticker # 14-232284. In reviewing the log, he learned that sticker # 14-232284 had been issued on 05/09/14 by Inspection Mechanic Steven P. Jalbert, Vermont Inspection Mechanic, certification number 21998974. DMV records indicate Steven P. Jalbert has been a State Certified Inspection Mechanic since 2004.
12. I have learned that the Ibey vehicle's odometer currently displays 86,104 miles. DMV records indicate that the mileage recorded on the Ibey vehicle inspection sticker was 85,721, which is consistent with the same mileage listed on AJ's Sunoco inspection log when this vehicle was inspected on 05-09-2014. This would be a difference of 383 miles between the time of inspection and the crash.
13. On August 13, 2014, at approximately 0930 hours, Investigator Evans traveled to the site of the accident, located at the intersection of Hill Street and Nelson Street in the City of Barre and made the following observations: Hill Street faces in an east to west direction and Nelson Street faces in a north to south direction. The intersection is in an urban location with private dwellings. From the area of the crash scene, looking east on Hill Street, there is an approximate 30% uphill grade. There are no sight obstructions and the intersection is easily visible when travelling west for approximately 400 feet. There were marks on the curb and roadway showing where the vehicle left the roadway, traveled across a grassy knoll in a westerly direction, entered Nelson Street next to a storm grate, crossed Nelson Street, then traveled down and over a slight embankment and collided with a small group of trees. The vehicle's undercarriage left visible gouge marks on the road surface of Nelson Street when it reentered the roadway.
14. Investigator Evans looked for evidence of brake fluid, but was unable to find any remaining residue at that time. In looking at the area where the vehicle came to a point of final rest, he was able to locate a small patch where the grass was burned away, indicating that a substance had spilled there. The burned grass was near where the vehicle's right rear tire was located at the point of final rest.
15. On August 13, 2014, at approximately 1000 hours, Investigator Evans spoke with Barre City Garage Employee \_\_\_\_\_, the mechanic who had examined the vehicle for the Barre City Police Department. \_\_\_\_\_ advised that during his examination he checked the brake pedal and found that there was "some" resistance. He said he checked the master cylinder reservoir and found it to be full. Investigator Evans said he asked if he placed Ibey's vehicle on a lift and inspected the brake lines and \_\_\_\_\_ replied that he had not.
16. On the morning of August 13, 2014, Investigator Evans arranged to have the Ibey vehicle towed to Maglaris Automotive in South Burlington, Vermont where a new examination of Ibey's vehicle would be conducted by me, Investigator Evans and Vermont Certified Inspection Mechanic George Maglaris. Ibey's vehicle was towed by Tom Stacey of Action Towing. Investigator Evans witnessed the vehicle loaded onto the flatbed and followed the

vehicle to Maglaris Auto. Investigator Evans had previously obtained a signed consent form from Donald Ibey, regarding the examination of his vehicle. DMV Detective Mike Morris and DMV Field Investigator Cindy Legault were also present for the examination.

17. On August 13, 2014, at approximately 1300 hours, we conducted an examination of the Ibey vehicle - a four door, silver, 1992 Chevrolet Corsica, bearing Vermont registration . Attached to the windshield was a red 6 inspection sticker, number 14-232284. I observed front-end impact damage to the right front passenger corner of the vehicle, directly in line with the right front passenger seat. The hood of the vehicle was buckled and rolled up backwards into the passenger side windshield of the vehicle. I further observed a buckling of the roof, just behind the windshield and over the passenger compartment of the car. The right front fender was completely buckled outward and pushed to the rear into the right front door and firewall of the vehicle. This door was also shifted rearward into the right rear door and buckled away from the door frame. The right rear door was also shifted rearward into the right rear fender/door frame assembly. The left front fender was shifted toward the right side of the vehicle and slightly rearward into the left front door, causing slight damage to the leading door edge. I observed no other damage along the left side of the vehicle.
18. Ibey's vehicle was placed on a lift in the garage and before it was lifted, Maglaris drew our attention to the passenger front door being buckled away from the frame of the car and how the sheet metal components to the passenger side of the vehicle were shifted backward, toward the rear of the vehicle. Maglaris advised he suspected, based on the vehicle year, the lower rocker panel/frame rails were most likely rotted away. He related the rocker panels/frame rails provide structural integrity to the vehicle, especially during front-end impacts. Maglaris further explained his observations of the sheet metal along the passenger side being shifted backward toward the rear, indicating the rocker panel/frame rails could not withstand the impact. Maglaris articulated the engine assembly for Ibey's model year vehicle, is designed to roll under the vehicle during a front-end impact, preventing the engine from being pushed into the firewall of the vehicle and possibly into the interior compartment of the vehicle. In this case, the engine compartment does not appear to have rolled down/under, but was pushed rearward into the passenger side toward the firewall. Other evidence of this can be seen by the rippled/buckled effect of the roof, directly over the passenger front compartment of the Ibey vehicle.
19. During the examination of the vehicle, I maintained a photo log for Investigator Evans, as he made observations and photographed areas of interest during the examination. The vehicle was first lifted about a foot off the floor, where Maglaris applied the brake pedal and we determined the tires on the vehicle rotated freely, while the brake pedal was depressed, indicating the brakes were not functioning. Maglaris indicated the pedal had no tension/pressure, as it should have for a functioning system.
20. Next, the engine hood was forced open so we could examine the master cylinder. We observed the master cylinder was pushed rearward, causing it to be out of level and tilting, with the front of the reservoir being higher than the rear of the reservoir. This causes an impression of the reservoir having brake fluid in it due to the fluid slightly pooling to the back, when in actuality, it was not full.
21. The vehicle was then lifted in the air to examine the undercarriage and components. It was



then we observed extensive rust, corrosion and deterioration to the vehicle right and left side rocker panels/frame rails. The amount of deterioration of the panels significantly reduced the structural integrity of the vehicle to withstand a front-end collision.

22. We observed extensive rust and corrosion to brake lines running underneath the vehicle. Breaks in both the rear brake lines were discovered, as well as indications of deteriorated lines and linings to the right and left front brake lines at the brake caliper assemblies. Two small brake fluid puddles formed on the garage floor after the brake pedal was depressed. The fluid spills were swabbed by me, using clean blue napkins and taken into evidence and later turned over to the Barre City Police Department.
23. The conditions observed were in plain view and should have been easily noticed and recognized during an appropriate Vermont Safety Inspection. The conditions observed on this vehicle are all causes for a vehicle to fail a Vermont Safety Inspection. Lastly, the conditions observed during our examination (with the exception of the two ruptured brake lines) would have clearly been present at the time of the last Vermont Safety Inspection conducted on the Ibey vehicle and should have resulted in the vehicle failing the inspection and being grounded. Our observations more than likely would have also been present during the 2013 vehicle inspection.
24. Based on our examination, evidence clearly exists to support the cause of the accident being due to the mechanical failure of the brake lines rupturing and not operator error.
25. At the conclusion of our examination, the vehicle was flat bedded back to the Barre City Impound Lot by Stacey, of Action Towing.
26. On August 20, 2013, at approximately 0830 hours, Investigator Evans traveled to the Barre City Impound Lot and removed and logged the inspection sticker affixed to the Ibey vehicle windshield, as evidence in this investigation.
27. On August 25, 2014, at approximately 1330 hours, Investigator Evans and I met with Chief Bombardier at the Barre City Police Department where he was provided with Investigator Evans' preliminary report, napkin swabs from our examination and copies of photographs/video we took during our examination of the Ibey vehicle. Subsequently, Barre City Police Department changed their accident report to reflect that the accident was caused by brake failure.
28. Investigator Evans and I met with Steven Jalbert DOB 11/14/1984, at AJ's Sunoco, located at 320 Washington Street in Barre, Vermont on three occasions, during which he made several admissions about his failure to properly inspect Ibey's vehicle. He voluntarily gave sworn recorded statements. The following paragraphs summarize Jalbert's statements.
29. The first time we met with Jalbert was August 25, 2014. We entered the business through the front door, where we observed a male employee assisting a customer. Upon making eye contact, we advised we were there to speak with Steven Jalbert. The male employee advised he was Jalbert and would be with us in a minute. After roughly five to ten minutes, Jalbert approached us and we identified ourselves to him as investigators with the Enforcement & Safety Division of the Vermont Department of Motor Vehicles. We

asked permission to speak with him regarding a recent vehicle inspection and Jalbert agreed. We met in a small office area located between the main store portion of the station and the garage bay portion of the station, roughly five feet by five feet.

30. Jalbert asked us which vehicle inspection we were inquiring about and we advised him it was regarding a 1992 Chevrolet Corsica. Jalbert immediately recalled the vehicle, stating, "Oh, that would be the car belonging to a guy with the last name of Ibey." Jalbert explained Ibey was a regular customer of his and that Jalbert had worked on this car and inspected it at their (AJ's Sunoco) station for the past three years. He offered he did not have much recollection of the most recent safety inspection for Ibey's vehicle. Jalbert confirmed he is a Vermont Certified Inspection Mechanic and has been for roughly the past 10 years. He explained he has learned everything under the tutelage of his father, The primary Inspection Station License holder for AJ's Sunoco is
31. Steven Jalbert recalled repairing a rear brake line on Ibey's vehicle about three years ago because it was leaking brake fluid. Jalbert used his office computer to access electronic invoices and located a work order showing that he replaced a left rear brake line on Ibey's vehicle. Jalbert stated he remembered at that same time, the other three brake lines on Ibey's vehicle were "seriously rusted", and he recommended to Ibey the remaining three lines be replaced, but Ibey declined his suggestion for whatever reason.
32. I asked Jalbert if he would be willing to provide me with a copy of the work invoice and he willingly printed the document and handed it to me. I observed the invoice articulated a left rear 14 inch brake line replacement with two fittings having occurred on April 18, 2012. Jalbert indicated he later inspected Ibey's vehicle, even though the remaining three brake lines showed indications of serious rust and corrosion. I asked him if he recalled why Ibey did not have the remaining three lines replaced and Jalbert could not recall. Jalbert then offered he inspected Ibey's vehicle the following year in 2013 and again for this year, occurring on May 9, 2014.
33. Inspection log records on file with DMV show that Steve Jalbert inspected Donald Ibey's vehicle on May 10, 2012, twenty-one days after replacing the broken brake line. The records on file also indicate Ibey's vehicle was inspected on May 9, 2013, by Steven's father, and on May 9, 2014, Ibey's vehicle was inspected by Steven Jalbert, whereby the existing red 6 inspection sticker was affixed to the vehicle's windshield.
34. When Steven Jalbert advised Ibey's vehicle was inspected at his garage for the last three years, I asked him, "It was inspected all three years with the same rusty corroded brake lines?" Jalbert paused, before responding, "Yeah" and nodding his head. When Jalbert was responding to my questions regarding Ibey's replaced brake line versus not replacing the remaining three brake lines, I observed Jalbert's demeanor as indicating that he felt Ibey was in the wrong and should have had the remaining brake lines replaced when Jalbert observed they were seriously rusted. Jalbert did not appear to consider the possibility that he and his father had completed faulty inspections on Ibey's vehicle for the last three years.

35. I asked Steven Jalbert if he had a Vermont Periodic Inspection Manual and he produced a very dirty manual that appeared very old and was not complete - it was in pieces and out of order in terms of chapters, etc. The manual appeared to be a 2007 version of the Vermont Periodic Inspection Manual. Jalbert told us this was the only manual he had and the only manual DMV has sent to their station.
36. The Vermont Periodic Inspection Manual has been updated twice, since 2007. The manual was updated in 2011 and most currently in 2013. I asked Steven Jalbert if he was aware of his responsibility as a Vermont Certified Inspection Mechanic to remain current and up-to-date with any modifications, updates or changes in State Vehicle Safety Inspection procedures/requirement at all times and he related he was fully aware of the requirement.
37. Jalbert recalled more details of the April 18, 2012, brake line repair to Ibey's vehicle. He advised Ibey drove the vehicle into his station with a broken left rear brake line. Jalbert said he replaced this line and recommended to Ibey that he have the other three brake lines replaced as well. Jalbert described the other three lines as being "just as rotted" as the first line he had to repair. Jalbert advised Ibey came in with his vehicle this year, whereby he (Jalbert) replaced the serpentine belt and conducted the latest inspection. Other than the serpentine belt, Jalbert said there was nothing else wrong with Ibey's vehicle.
38. I pointed out to Steven Jalbert the fact that he observed badly corroded brake lines two years ago and I asked him if the brake lines on Ibey's vehicle were in even worse condition at this latest inspection. Jalbert responded, "They were rusty. Correct. But they were not leaking." I asked him if he considered failing Ibey's vehicle for inspection and he said he did not and that he passed it. He further offered, regarding the latest inspection of Ibey's vehicle, "When he came in this year, there was no...yes they were rusted. I didn't see any brake leaks. The hoses (brake) looked twenty-two years old. They weren't cracked or anything. So, I did pass it for inspection."
39. I asked Jalbert to describe for me, in his opinion, what would cause him to fail an inspection with regard to brake component conditions without signs of leakage. He said he would fail an inspection if the brake hose was cracked or deteriorated, blistered or had bulges in it. Jalbert related as far as the steel portion of the brake line is concerned, he was told if it was rusted, but not leaking, to pass it.
40. I asked Steven Jalbert if he specifically remembered doing Ibey's last vehicle inspection. Jalbert said he remembers doing it "but, from exact point to point, no." I asked Jalbert to explain for us what he remembered doing when he performed the last inspection on Ibey's vehicle. Jalbert advised words to the effect of, "Put the vehicle in the air, raised it up, checked the wheel bearings in the back, checked the wheel bearings left and right, checked the front tie rod and ball joints, made sure the hoses weren't cracked, checked the exhaust for leaks, looked underneath the vehicle, made sure there was no big damage or rot holes, made sure the window wasn't cracked, windshield wipers worked correctly, made sure the horn worked, lights functioned properly, set it down and continued with the inspection."

41. I asked Jalbert if when old vehicles come into his station for inspection, it sends a red flag up for him, suggesting he be extra thorough. Jalbert said, "We should be thorough with every car. It doesn't matter whether it's old or not." It was at this time, Investigator Evans showed Jalbert photographs of Ibey's vehicle taken during our examination on 08/13/2014. The photos shown to Jalbert were of the corroded brake lines, the cracked lines with bulges and of the rotted rocker panels/frame rails. Upon explaining and showing him the pictures, I asked him what he thought. Jalbert replied, "I don't foresee that happened in four months, or three months, so, either I wasn't as thorough as I thought..."
42. I asked Jalbert if there was any possibility he knew the Ibey vehicle would fail the inspection and if Donald Ibey was pressuring him or talked him into passing the inspection. Jalbert replied, "I'm not trying to point any fingers. No. I'm not saying I couldn't have been busy at one time and because the year before it passed, you know, I'm not saying that. Um, to my recollection, I thought that I did go through it (Ibey's vehicle) just as well as I did the year before."
43. Based on the condition of the rocker panels, I asked Steven Jalbert if it was possible he did not place Ibey's vehicle on the lift during the last inspection process. Jalbert replied in the affirmative, "Could possibly." I asked Jalbert, on average, how many instances might occur where he does not place a vehicle on a lift during an inspection process. He replied, "Slim to none... There may be one... There's not one out of ten. There's not one a month. It could have just slipped." I asked him if anyone would have helped him conduct the Ibey vehicle inspection and he said, "No."
44. Going back to the pictures, I asked him what he felt about the condition of the Ibey vehicle, specifically the brake lines. Jalbert replied, "They should have been replaced." Jalbert recognized the brake line he fixed in 2012, was not a coated brake line. He said coated brake lines have just come out, but he questioned himself as to why he did not replace the Ibey brake line in 2012 with a coated line, designed to withstand corrosions/rust. Jalbert said he was never informed about failing a vehicle for rusty brake lines. With regard to the noticeably cracked front lines with bulges, Jalbert said he should have caught that and failed the inspection.
45. We then discussed the condition of the rocker panels/frame rails. I asked him what his expert opinion as a mechanic was with regard to the significance of deteriorated rocker panels. Jalbert said "normally, that does not pass." I asked him what significance a rocker panel plays in the safety conditions of a vehicle. Jalbert replied, "Structure." I clarified with him if his response meant the panels play a role in the structural integrity of the vehicle and he said "yes."
46. Jalbert confirmed it was possible Ibey's vehicle was not placed on a lift during the inspection process. Jalbert also confirmed Donald Ibey did not talk him into or have a conversation with him trying to persuade him to pass the vehicle for inspection. This concluded this first interview with Jalbert. For further details, refer to the digitally recorded statement.
47. Investigator Evans and I then reviewed the portions of the 2007 manual. The 2007 manual does not specify that rusty brake lines are a reason to fail a vehicle. Investigator

Evans and I then reviewed the 2013 manual standards for rejecting an inspection with regard to brake components. The 2013 manual clearly articulates rusty lines as a reason to fail a vehicle. We further observed the language for this section in the 2007 and 2013 manuals was pretty much identical, except for the rusty brake line issue. Both manuals required a test drive of a vehicle and a 150 lb. PSI brake test during an inspection. Removing a tire from the vehicle became a requirement in 2011 and remains a current requirement to date.

48. We went back to Steven Jalbert's office and asked him if we could ask him a few more questions and he agreed. I showed Jalbert the 2013 Vermont Periodic Inspection Manual section pertaining to the brake test requirement and I asked him if this was a test he was conducting during vehicle inspections and specifically during Ibey's last vehicle inspection. Jalbert said he was familiar with the requirement and does not use a brake pressure gauge, meaning he physically applies pressure to the pedal for the test. I asked Jalbert if he followed this requirement when he inspected Ibey's vehicle and he said he did not know. I asked him if it was possible he did not apply the test and he said it was. Jalbert explained he drove Ibey's vehicle into his garage bay for the inspection process, meaning the only amount of pressure he applied to the brake pedal was that amount needed to bring Ibey's vehicle to a stop from a coasting speed. Jalbert agreed 150 lbs. of brake pressure is a forceful pedal depression. Jalbert qualified he did not perform this brake test requirement during Ibey's vehicle inspection.
49. I then showed him the language used in the 2013 manual regarding brake component inspection and reasons to reject. Jalbert said this was the first time he had seen the language. I asked Jalbert if he recalled removing one tire from Ibey's vehicle as required during an inspection process, and he replied he did not remove a tire from Ibey's vehicle during the inspection process. Jalbert said he knew this was a requirement, but could not explain why he failed to follow the requirement. I then asked Jalbert to try and explain to me what he knew he did not do, as required, when he inspected Ibey's vehicle. He replied, "I don't know." With regard to not pulling a tire off Ibey's vehicle, Jalbert agreed this was why he more than likely missed the cracked, bulged brake lines on the front of Ibey's vehicle. I asked Jalbert whether or not he road tested the car and he advised he probably had not done that requirement either.
50. Investigator Evans and I then further discussed with Steven Jalbert his claim he/his station had not received any updated inspection manuals from DMV. I asked him if he would be willing to check through his office and he spent time rummaging through a cabinet in which he said he would keep the materials. Jalbert could not find anything and so he hollered out to his father to come into the office. Both his father and he looked through the cabinet together. While doing so, I observed a yellow envelope, I recognized as one used by DMV, lying on a shelf in the cabinet under other materials. I asked them what the envelope contained and advised it held extra stickers and numerals. failed to check the envelope for me, as he continued to rifle through materials in the cabinet. I asked him if they would be willing to open the envelope to be sure, and retrieved it. opened the envelope and removed a clean, fresh, 2013 Vermont Periodic Inspection Manual. I could see it had never been used or opened, because it was still banded closed, for mailing purposes. I again asked both of them if they were aware of their requirements to stay current with all updated manuals and materials sent to them by the DMV for Vermont Safety Inspections.

Both said they knew they were required to do so.

51. On September 5, 2014, at approximately 1445 hours, I contacted George Maglaris regarding the brake testing process for vehicle inspections. Maglaris explained the average person applies anywhere from 50 to 80 lbs. of pressure to their brake pedal when stopping their vehicle with an average speed of 20 to 25 miles per hours. Maglaris related this amount of pressure should stop a vehicle within roughly 25 feet. The Vermont State Inspection process requires significantly more pressure be exerted to a brake pedal during an inspection process of a vehicle's braking system. The process is designed to test the integrity of the braking system of a vehicle for abnormal driving/braking conditions. Maglaris indicated 150 lbs. of pressure is much more significant than the usual amount of pressure required for a person to brake and bring their car to a stop under normal driving conditions. He compared the pressure of 150 lbs. consistent to a rapid emergency stop.
52. On September 25, 2014, at approximately 1015 hours, Investigator Evans interviewed Donald Ibey at his residence concerning the inspection of his vehicle which occurred 05/09/14, and was inspected by Steven Jalbert. Ibey stated that he took his vehicle to AJ's Sunoco to have a Vermont State Inspection done. Ibey advised he waited about an hour for the vehicle. Investigator Evans asked if he knew the person who worked on his vehicle and Ibey replied that it was the younger mechanic. Ibey did not know if his vehicle had been test driven or placed on a lift during the inspection process. Ibey stated that during the time he was there, he waited in the waiting area of the business. Investigator Evans asked him if they (the mechanic) had discussed with him the work his vehicle needed and he replied they (the mechanic) did not. He continued that they had done the inspection and that was all they did.
53. On September 24, 2014, at approximately 1330 hours (pm), Investigator Evans and I met with Steven Jalbert a second time. During this conversation, Jalbert stated he had not placed Ibey's vehicle on a lift during the May 9, 2014 inspection. Jalbert said he had not removed a tire from Ibey's vehicle to inspect braking components and he said he did not take Ibey's vehicle on a test drive. Jalbert related he did not conduct the required 150 lb. PSI brake test on Ibey's vehicle during the last inspection process. Jalbert also stated that he was not aware of the 150 lb. PSI brake test requirement.
54. On October 23, 2014, at approximately 1100 hours, Investigator Evans and I traveled to AJ's Sunoco and met with Steven Jalbert again and his father. The purpose of this visit was to try and obtain the old outdated Vermont Periodic Inspection Manual Steve Jalbert was using when we first interviewed him on August 25, 2014. Steven Jalbert advised he had since thrown the older manual away to prevent the risk of utilizing outdated requirements. He pointed to a manual on his office desk they were currently using and I observed it to be the 2011 Vermont Periodic Inspection Manual, which was also not current. I asked him where the 2013 manual was that we had located on August 25, 2014 and it was located on a shelf in the office. I took the 2011 expired manual into custody and advised him to work from the 2013 manual. The 2011 manual was later turned over to the Barre City Police Department as evidence in this investigation.
55. We then explained our findings in the investigation with regard to our intentions to issue administrative penalties to both the station and to Steven Jalbert. We further explained that the Barre City Police were also conducting an investigation into potential criminal

wrongdoing. We answered any questions they had about their right to a hearing, before departing. It should be noted that when we discussed the matter of Mrs. Ibey dying, Steven Jalbert displayed no signs of remorse or concern over his involvement in the matters leading to the death of Mrs. Ibey. In fact, he showed more concern about their inability to conduct vehicle inspections in the future.

56. On December 30, 2014, at approximately 1055 hours, I met with Barre City Garage Mechanic \_\_\_\_\_, at the Barre City Garage where he provided me with a sworn statement regarding his examination of Ibey's vehicle brake system.

57. In his statement \_\_\_\_\_ relayed the following: A 1991 or 1992 bluish grey Chevrolet "Cavalier" was towed into the Barre City Garage lot. The car was at the lot when \_\_\_\_\_ arrived at work on the morning of the exam. A Barre City Police Officer requested that he examine the vehicle for brake issues. He first depressed the vehicle's brake pedal, which went "right to the floor", but he then realized he had depressed the clutch pedal, rather than the brake pedal. \_\_\_\_\_ related he then had the vehicle lifted in the air by a fork lift, to examine the underneath. He examined the brake lines and did not see any bad brake lines or any brake lines leaking. The vehicle was then placed back on the ground and he examined the interior of the car, which was when he realized it was a standard and he had originally depressed the clutch pedal. He depressed the brake pedal and it "had a good brake pedal", meaning there was pressure to the pedal. After pressing the brake pedal, he said he did not re-exam the brake lines to look for indications of leakage. He could not get the engine hood opened and so he pried it up enough to reach in and remove the cap to the brake master cylinder reservoir. He then stuck a finger "a little bit" inside of the reservoir and determined there was fluid in the reservoir. Based on this examination, \_\_\_\_\_ determined there was nothing wrong with the brake system of Ibey's vehicle and he assumed Ibey panicked and must have depressed the clutch pedal prior to the collision. \_\_\_\_\_ estimated his examination of the Ibey vehicle took about twenty minutes.

I described to \_\_\_\_\_ what we found when we examined Ibey's vehicle with regard to two ruptured brake lines and the significant amount of corrosion and rust to the brake lines.

\_\_\_\_\_ related he was surprised and offered Ibey's vehicle sat in their impound lot for a while, before our examination. I asked \_\_\_\_\_ if he checked the brake master cylinder reservoir to determine if it was level or cocked backward, when he dipped his finger into it. Hill said he did not check for level. After discussing this, \_\_\_\_\_ agreed the fluid he felt in the reservoir could have been fluid which pooled backward, due to the reservoir's tilted angle.

58. I showed \_\_\_\_\_ photographs taken during our examination of Ibey's vehicle. Upon viewing the pictures of the brake lines and rotted rocker panels/frame rails, \_\_\_\_\_ appeared very surprised. \_\_\_\_\_ then offered that his examination of the Ibey vehicle was performed very quickly and was very "cursory." \_\_\_\_\_ said he was surprised he missed what we discovered.

59. On December 30, 2014, at approximately 1411 hours, I met with Tom Stacey DOB 01/05/1963, at his garage located at 496 Route 302 in Orange, Vermont, where he provided me with a sworn statement.

60. Stacey recalled towing the Ibey vehicle from the scene of a collision at Hill and Nelson Streets in Barre on his flatbed wrecker and recalled the car to be an old 1992, four door, Chevrolet Corsica. Stacey winched the vehicle onto his flatbed from the back of the vehicle, attaching two "T" hooks to the rear cross member suspension, located in the center of the car and away from any of the brake lines. Stacey advised that once the vehicle was on his truck, he towed it straight to the Barre City Impound Lot.
61. Stacey was told by an officer on scene that the driver of the car had heard a "pop" and lost his brakes, just before the collision.
62. Stacey said he noticed it was "wet back there" when he was attaching the "T" hooks to Ibey's vehicle to winch it onto the flatbed wrecker. Stacey advised he observed what appeared to be brake fluid "coming down" when hooking it up. Stacey said he and the officer both made comments about noticing the vehicle had been recently inspected and Stacey further commented about how rusty the floor (undercarriage) was and having holes in which you could place your fist up into the rocker panels on both sides of the car.
63. Stacey has worked on cars since he was fifteen years old and has experience with engines, rear ends, transmissions and brake systems. He has replaced brake lines, changed brake linings, replaced brake shoes and worked on air brakes.
64. I asked Stacey if he knew the difference between motor oil, transmission fluid, windshield washer fluid and differential fluid. Stacey explained that they all have different weights, viscosities and different purposes. Having this knowledge and experience, I asked Stacey what his opinion was of the fluid he observed coming from the rear of Ibey's Vehicle when he towed it. Stacey replied, "Well, it looked like it was coming from the brake lines. In my opinion, it was (brake fluid)." Stacey articulated there is nothing else in the rear section of that model year car, other than the gas tank, which could leak fluid.
65. We discussed further the amount of rust he observed on Ibey's vehicle. Stacey related the amount of rust on both rocker panels on the car was obvious and "You could put your fist inside of it, that big of a hole." Stacey said he is not a State Certified Inspection Mechanic, but he is somewhat aware of the inspection requirement for vehicles, because he is also in the business of buying and selling cars. Stacey said he did not enter the vehicle when he towed it. Stacey further advised he was escorted to the impound lot by Barre City Police when he towed it. He recalls the accident having occurred on a Saturday and the Police had to open the gate to the impound lot. Stacey was not present when the car was later examined at the impound lot.
66. I learned that some repairs to Ibey's vehicle had been performed by Cody Chevrolet on May 7, 2013 to an electronic brake module. On December 31, 2014, at approximately 1230 hours, I met with retired mechanic \_\_\_\_\_, who had completed some repairs on Ibey's vehicle at Cody Chevrolet. \_\_\_\_\_ was employed with Cody Chevrolet for thirty-five years. \_\_\_\_\_ also advised, at the time of the repair made to Ibey's vehicle, he was a Vermont State Certified Inspection Mechanic. \_\_\_\_\_ worked at Cody Chevrolet in the capacity of an Automotive Service Technician. I showed \_\_\_\_\_ a copy of a work repair invoice on Ibey's vehicle and he said he did in fact recall working on Ibey's vehicle. \_\_\_\_\_ said the repair to Ibey's vehicle occurred in the engine compartment, against the firewall. \_\_\_\_\_ advised he never had to place Ibey's vehicle in the air, nor did the



repair require any work to the mechanical brake system with regard to brake lines, etc. said he never looked at the brake components on Ibey's vehicle during this repair. The vehicle remained on the floor at all times.

67. I learned Ibey's vehicle was serviced on May 1, 2014, for an oil change and 27 point courtesy inspection at Cody Chevrolet. The work was completed by Mechanic . It should be noted, this work was completed eight days prior to Ibey's vehicle being last inspected and passed by Steven Jalbert at AJ's Sunoco.
68. On February 10, 2015, at approximately 0903 hours, I met with Cody Chevrolet Mechanic has been a Vermont Certified Inspection Mechanic for the last three years and has worked for Cody Chevrolet for a little more than one year as a Service Technician. Prior to working for Cody Chevrolet, said he worked for 802 Toyota, as a mechanic, for approximately two years. related his current job responsibilities include the inspection of customer vehicles and performing mechanical repairs to customer vehicles.
69. I showed a copy of the work invoice specific to Ibey's vehicle and dated May 1, 2014. I asked him if he recognized the invoice and if recalled Ibey's vehicle. advised he did in fact remember performing the work and remembers the car. I asked him how he could remember the vehicle and he said he remembered it because it was a 1992 Corsica and looked very "clean" on the topside, meaning in good shape for the year of the car. confirmed his recollection of changing the vehicle's oil and administering a 27-point courtesy inspection. It is important to note, this courtesy inspection is not a Vermont Safety Inspection, but an examination of a vehicle to identify potential issues which may require repair in the future and to bring to the owners attention, etc.
70. described what he would look at while performing a courtesy inspection. advised he would look at the brakes, shocks and look for anything leaking. I drew attention to the comments listed on the invoice stating, "Rockers getting tender." I asked him if the statement was in his words or common language used by mechanics to describe a condition. related the words were common mechanic language. I asked him what he recalled about the rocker panels getting "tender." said he remembered placing the lift arms under the "pinch wells" of the rocker panels of Ibey's vehicle and upon lifting the car; the rocker panels began to buckle and collapse from the weight of the car as a result of the rusting. said he could recall seeing rust holes in the rocker panels.
71. I asked , based on his recollection of the rocker panels on Ibey's vehicle and his knowledge and experience as a Vermont Certified Mechanic, if he would have passed Ibey's vehicle had it been a Vermont Safety Inspection and said he would not have passed the vehicle.
72. I asked to clarify the depth his examination of a vehicle's brakes goes, when conducting a 27-point courtesy inspection. said he examines the brake pads, brake rotors and the "easily visible brake lines." I asked him if he specifically recalled examining the brake lines on Ibey's vehicle on May 1, 2014. said he did not recall examining them. I asked if the courtesy inspection check sheet listed the brake lines or just the brake pads and rotors. believed the check list only lists the pads, rotors and emergency brake cable. advised that had he seen corroded brake lines on a vehicle

during a courtesy inspection, he would notify the owner of his findings but, he does not specifically examine a vehicle for corroded brake lines during this type of examination.

73. It should be noted, a review of the check list used at Cody Chevrolet, incorporated with this investigation, does in fact list brake lines. It should also be noted, the check list specific to Ibey's courtesy inspection on May 1, 2014, could not be located.
74. I showed [redacted] pictures of Ibey's vehicle rocker panels in the condition we found them when we examined the car on August 13, 2014. In reviewing the photographs, [redacted] described the holes as being present, along with surface rust/corrosion being present along the length of the panels, as displayed in the pictures. [redacted] related that he did not recall the amount of deterioration being present along the outer edges of the rocker panels as displayed in the photographs with the exception of the outer edges being "tender" and it was the outer edges which appeared to show buckling, when he placed Ibey's vehicle on his lift. [redacted] said the August 13, 2014 photographs' depicting the condition of the rocker panel on the driver side of Ibey's vehicle is similar in appearance and characteristics to what he observed on May 1, 2014. With regard to the condition of the passenger side rocker panel depicted in the August 13, 2014 photographs, [redacted] said the panel was not as deteriorated on May 1, 2014, when he observed it.
75. I asked [redacted] if he recalled having a conversation with Donald Ibey about the issues he found to the car during the 27-point courtesy inspection. [redacted] said Ibey would have seen the notes listed on his copy of the invoice and he "might" have said something to Ibey in person. Assuming the conversation occurred and without having more recollection, [redacted] said he would have told him about the points listed on the invoice. [redacted] does not recall Ibey replying to the issues discovered. I asked [redacted] if he would have had any kind of a conversation with Ibey about the car not being safe to operate on the road and [redacted] replied, "No. I just said that he's going to need to do things and probably a couple other things he's going to have to do very soon." I asked [redacted] if he told Ibey the issues would need to be fixed before it would pass its next safety inspection and [redacted] said, "No. That they were more or less safety things." [redacted] again said he did not recall Ibey responding to his findings.
76. On July 9, 2014, a Vermont Certificate of Death, was issued for Elizabeth Ibey. Vermont State Medical Examiner Steven L. Shapiro, MD, certified the cause and manner of Elizabeth Ibey's death to be blunt force trauma to her chest and extremities as a result of an auto accident.
77. On July 24, 2015, Steven Jalbert was indicted by a Grand Jury in Washington County, Vermont for involuntary manslaughter.

### Conclusion

Based upon my investigation, I have probable cause to believe that Steven P. Jalbert committed the crime of Involuntary Manslaughter, in violation of 13 V.S.A. § 2304 because he conducted a safety inspection of Donald Ibey's vehicle with criminal negligence and caused the death of Elizabeth Ibey. Jalbert knew that he had a duty to inspect the vehicle in accordance with the periodic inspection manual and failed to do so when he failed to inspect the brake lines and rocker panel/frame rails of the vehicle. He failed to put the vehicle on a lift, failed to remove a wheel,

failed to test drive and failed to perform an adequate brake test. By passing the vehicle with unsafe brakes and unsafe structural integrity, Jalbert grossly deviated from the standard of care required for a motor vehicle safety inspection mechanic. If the vehicle had failed the inspection it would have had to be repaired or it could not have been legally operated on the public highways of Vermont after June 30, 2014. On July 5, 2014, the vehicle lost brake function and crashed resulting in the death of Elizabeth Ibey. The death resulted from the unsafe condition of the vehicle.

I also have probable cause to believe that Steven P. Jalbert committed the crime of Reckless Endangerment, in violation of 13 V.S.A. § 1025 because he recklessly conducted a safety inspection of Donald Ibey's vehicle placing Donald and Elizabeth Ibey in danger of death or serious bodily injury. Jalbert acted recklessly by consciously ignoring a known, substantial and unjustifiable risk by failing to inspect the vehicle's brakes and rocker panel/frame rails in accordance with the periodic inspection manual, which was a gross deviation from how a law-abiding person would have acted in the same situation inspecting the vehicle.

LT. Tim F. Chelmsford  
(Affiant)

Subscribed and sworn to before me on August 10, 2015, at Essex, Vermont.

J. Seay  
Notary Public (expires 2/10/2019)

STATE OF VERMONT

SUPERIOR COURT  
WASHINGTON UNIT

CRIMINAL DIVISION  
Docket No.      Wrcr

STATE OF VERMONT

v.

STEVEN JALBERT

VERMONT ATTORNEY GENERAL'S PROPOSED CONDITIONS OF RELEASE

I. Conditions of Release

1.    ☒ You must come to court when you are told to.
2.    ☒ You must give your attorney or the court clerk your address and phone number. If it changes, you must tell them immediately.
3.    ☒ You must not be charged with or have probable cause found for a new offense while this case is open.
4.    ☐ You shall be released into the custody of a responsible adult who agrees to supervise you, upon approval by the court, after hearing.
5.    ☐ You must report to \_\_\_\_\_ police station/barracks and check in on \_\_\_\_\_ between the hours of 8:00 a.m. and 8:00 p.m.
6.    ☐ You must live in \_\_\_\_\_ County. You cannot leave the county without the court's permission.
7.    ☐ You cannot drive any motor vehicle, including a car, truck, or motorcycle.
8.    ☒ You cannot drive any motor vehicle, including a car, truck, or motorcycle unless you have a valid driver's license, one that is not suspended or expired or revoked.
9.    ☐ You must submit to an alcSENSOR when you report to the police station/barracks.
10.   ☐ You must NOT buy, have or use regulated drugs without a prescription.
11.   ☐ Curfew: \_\_\_\_\_

Office of the  
ATTORNEY  
GENERAL  
109 State Street  
Montpelier, VT  
05609

12.    \_\_\_ You must NOT buy, have or drink any alcoholic beverage.
13.    \_\_\_ You must NOT buy, have or use any firearms or dangerous/deadly weapons.
14.    \_\_\_ You must NOT have contact with minors age 18 or under, which includes in person, in writing, by telephone, e-mail or through a third person, except for incidental and inadvertent contact, which you must terminate as soon as practicable.
15.    \_\_\_ You must NOT abuse or harass in any way \_\_\_\_\_  
\_\_\_\_\_.
16.    \_\_\_ You shall not enter upon the residence or property of \_\_\_\_\_  
\_\_\_\_\_.
17.    \_\_\_ You shall report to \_\_\_\_\_ within 3 business days for taking of photograph and fingerprints.
18.    \_\_\_ You shall comply with all Family Court Orders.
19.    \_x\_ You shall have no contact with Donald Ibey and Barry Ibey.