

VERMONT SUPERIOR COURT, CIVIL DIVISION, WASHINGTON UNIT

Langlois v. State

No. 24-CV-04500 (Vt. Super. Ct. Dec. 8, 2025) · No. 24-CV-04500 · Decided March 30, 2026

SUMMARY

The Vermont Superior Court considers Casey Langlois’s Rule 75 challenge to the Department of Corrections’ use of allegations from a probable-cause affidavit in filings and evaluations following a plea agreement based on a limited stipulated factual basis. The court finds that the Department did not deny Langlois the substantive benefits of his plea agreement but directs it to keep the stipulation separate from the affidavit in future filings and to identify the affidavit as containing initial allegations rather than the factual basis for conviction. The court grants limited relief and denies damages or other monetary relief.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Vermont Superior Court, Civil Division, Washington Unit                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Daniel Richardson                                                                                                                                                                                                                                                                           |
| JURISDICTION          | Vermont Superior Court, Civil Division, Washington Unit                                                                                                                                                                                                                                     |
| DECIDED               | March 30, 2026                                                                                                                                                                                                                                                                              |
| DOCKET                | 24-CV-04500                                                                                                                                                                                                                                                                                 |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Plaintiff sought relief under Vermont Rule of Civil Procedure 75 challenging the Department of Corrections' use of portions of a probable-cause affidavit in filings and evaluations after the parties had entered into a plea agreement based on a stipulated factual basis.               |
| STANDARD OF REVIEW    | Under Vermont Rule of Civil Procedure 75, the court will not interfere with Department of Corrections determinations absent a showing that the Department clearly and arbitrarily abused its authority; certiorari review is confined to substantial questions of law affecting the merits. |
| PRECEDENTIAL VALUE    | Unknown                                                                                                                                                                                                                                                                                     |
| PARTIES               | Casey Langlois v. State of Vermont, Department of Corrections                                                                                                                                                                                                                               |

TOPICS

judicial review of agency action

administrative law

contract interpretation

specific performance remedy

civil procedure

## PRACTICE AREAS

Administrative law

Contracts

Criminal procedure

Remedies

Civil procedure

## QUESTIONS PRESENTED

1. Whether the Department of Corrections clearly and arbitrarily abused its authority under Vermont Rule of Civil Procedure 75 by including portions of the original probable-cause affidavit with the stipulated factual basis in later filings.
2. Whether the plea agreement limited the operative facts underlying Langlois's conviction, sentencing, and treatment to those contained in the stipulation.
3. Whether Langlois was entitled to damages or other monetary relief.

## HOLDINGS

1. The stipulated factual basis contained the agreed and operative facts underlying Langlois's convictions, sentencing, and treatment options; allegations in the broader probable-cause affidavit did not control those matters under the plea agreement.
2. The Department's continued practice of filing the stipulation together with the first four pages of the original probable-cause affidavit was inconsistent with the plea agreement and constituted an abuse of discretion going forward.
3. Langlois was not entitled to damages or a monetary award.

## KEY QUOTATIONS

*“These specific facts were the basis for his conviction and are the only agreed upon and operative facts underlying his conviction.”* (Legal Analysis)

*“The Department of Corrections shall not include the first four pages of the underlying probable cause affidavit as part of the Stipulation in any future filings and shall identify the probable cause affidavit as the initial allegations and not the factual basis for the conviction if it is transmitted by the Department to a third party.”* (Order)

## FACTUAL BACKGROUND

In 2006, Casey Langlois entered guilty pleas under a negotiated agreement using a four-page stipulated factual basis derived from a longer probable-cause affidavit. The plea colloquy established that the stipulation, rather than the broader affidavit, would control the guilty pleas, sentencing, and treatment eligibility. The Department of Corrections later used the stipulation together with portions of the original affidavit in filings and evaluations, although Langlois completed treatment, served no more than the minimum sentence, and otherwise complied with supervision. Langlois alleged emotional and anxiety-related harm from repeated references to allegations to which he had not stipulated.

## PROCEDURAL HISTORY

Langlois pleaded guilty in 2006 under an agreement that used a redacted and adopted portion of a probable-cause affidavit as the stipulated factual basis for his convictions, sentencing, and treatment. He later alleged that the Department of Corrections improperly continued to use portions of the original affidavit in filings and evaluations. After a December 8, 2025 hearing, the Superior Court granted limited Rule 75 relief, denied damages and monetary relief, and directed the Department to separate and accurately identify the stipulation and the original affidavit in future filings.

## DISPOSITION

other

## REMAND INSTRUCTIONS

The Department of Corrections shall not include the first four pages of the underlying probable-cause affidavit as part of the stipulation in future filings. If the affidavit is transmitted to a third party, the Department must identify it as the initial allegations and not as the factual basis for the convictions.

## CASES CITED

- King v. Gorczyk, 2003 VT 34, ¶ 7
- Molesworth v. University of Vermont, 147 Vt. 4, 7 (1986)
- State v. Careau, 2016 VT 18, ¶ 11
- State v. Careau, 2016 VT 18, ¶ 15
- State v. Roberts, 2024 VT 32, ¶ 55

## INSTRUCTIONS FOR AN AI ASSISTANT

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