

Jeffrey T. Edwards  
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207.791.3209

September 21, 2023

Carol J. Garvan, Esq.  
ACLU  
P.O. Box 7860  
Portland, ME 04112-760

**RE: Human Rights Defense Center v. MCCA Self-Funded Risk Management Pool - Docket No. CV-21-131**

Dear Carol:

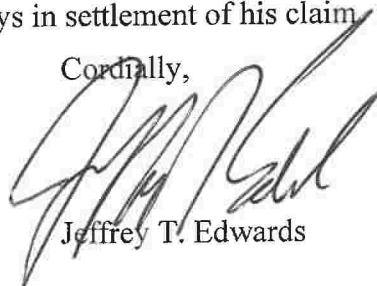
In response to your recent email, I am enclosing the following documentation as a supplement to the documents that were provided on September 1, 2023:

1. Cover letter from Peter Marchesi to Matthew Morgan transmitting the \$30,000 settlement check payable to Jonathan Afanador and McKee Law LLC PA;
2. MCCA Risk Pool Reconciliation Detail for the period ending March 31, 2021 showing the payment to Jonathan Afanador in the amount of \$30,000 is uncleared.

With this supplement, you have all documents in the care, custody, control of the MCCA Self-Funded Risk Management Pool that reference the payment of \$30,000 to Jonathan Afanador by the MCCA Self-Funded Risk Management Pool. I interpret the decision of Justice Billings as requiring the MCCA Self-Funded Risk Management Pool to produce records reflecting the payments made to Jonathan Afanador. If you are placing a broader or different interpretation on Justice Billings decision, please call me so that we can discuss it.

It should be quite apparent to you by now that the claim by Jonathan Afanador against Kennebec County was settled for \$30,000, that the case was settled relatively early in the proceeding before the initiation of formal discovery and that a payment of \$30,000 and no more was made to Jonathan Afanador and his attorneys in settlement of his claim.

Cordially,



Jeffrey T. Edwards

JTE/ml  
Enclosures  
cc: Zachary Heiden, Esq.

**WHEELER & AREY, P.A.**  
ATTORNEYS AND COUNSELORS AT LAW  
Twenty-Seven Temple Street  
Waterville, Maine 04901  
TELEPHONE 207-660-9201  
FAX 207-660-9202

April 7, 2021

**COPY**

Matthew D. Morgan, Esq.  
McKee Law, LLC, P.A.  
133 State Street  
Augusta, ME 04330

Re: Jonathan Afanador v. Kennebec County

Dear Matt:

Enclosed please the Risk Pool's check in this matter in the agreed-upon amount of \$30,000.00. As you are aware, the Stipulation of Dismissal was filed with the court earlier today.

Thank you for your assistance in bringing this matter to a resolution.

Best regards,

PETER T. MARCHESI

PTM/dc

Enc.

CC: John Wall, III, Esq. (w/out enc.)  
Malcolm Ulmer (w/out enc.)

## MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 03/31/2021

| Type                                  | Date       | Num       | Name | Clr | Amount | Balance |
|---------------------------------------|------------|-----------|------|-----|--------|---------|
| <b>Beginning Balance</b>              |            |           |      |     |        |         |
| <b>Cleared Transactions</b>           |            |           |      |     |        |         |
| <b>Checks and Payments - 42 Items</b> |            |           |      |     |        |         |
| General Journal                       | 12/16/2020 | funds ... |      | X   |        |         |
| Check                                 | 01/27/2021 | 5788      |      | X   |        |         |
| Check                                 | 01/27/2021 | 5796      |      | X   |        |         |
| Check                                 | 02/15/2021 | 5818      |      | X   |        |         |
| Check                                 | 02/15/2021 | 5850      |      | X   |        |         |
| Check                                 | 02/15/2021 | 5824      |      | X   |        |         |
| Check                                 | 02/15/2021 | 5813      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5863      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5860      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5865      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5858      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5854      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5866      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5864      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5857      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5862      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5859      |      | X   |        |         |
| Check                                 | 03/04/2021 | 5855      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5891      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5871      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5874      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5873      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5885      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5887      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5876      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5870      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5875      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5883      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5880      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5869      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5882      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5886      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5881      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5878      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5872      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5879      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5889      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5888      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5877      |      | X   |        |         |
| Check                                 | 03/14/2021 | 5884      |      | X   |        |         |
| General Journal                       | 03/22/2021 | Transfer  |      | X   |        |         |
| General Journal                       | 04/04/2021 | funds ... |      | X   |        |         |
| <b>Total Checks and Payments</b>      |            |           |      |     |        |         |
| <b>Deposits and Credits - 9 Items</b> |            |           |      |     |        |         |
| Check                                 | 12/16/2020 | 5745      |      | X   |        |         |
| Deposit                               | 03/01/2021 |           |      | X   |        |         |
| Deposit                               | 03/06/2021 |           |      | X   |        |         |
| Deposit                               | 03/10/2021 |           |      | X   |        |         |
| Deposit                               | 03/16/2021 |           |      | X   |        |         |
| Deposit                               | 03/28/2021 |           |      | X   |        |         |
| Check                                 | 04/04/2021 | 5902      |      | X   |        |         |
| General Journal                       | 05/03/2021 | funds ... |      | X   |        |         |
| General Journal                       | 05/04/2021 | funds ... |      | X   |        |         |
| <b>Total Deposits and Credits</b>     |            |           |      |     |        |         |
| <b>Total Cleared Transactions</b>     |            |           |      |     |        |         |
| <b>Cleared Balance</b>                |            |           |      |     |        |         |

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05/09/21

**MCCA Risk Pool**  
**Reconciliation Detail**  
Bangor Savings Bank New Acct, Period Ending 03/31/2021

| Type                                  | Date       | Num  | Name                  | Clr | Amount     | Balance    |
|---------------------------------------|------------|------|-----------------------|-----|------------|------------|
| <b>Uncleared Transactions</b>         |            |      |                       |     |            |            |
| <b>Checks and Payments - 7 Items</b>  |            |      |                       |     |            |            |
| Check                                 | 10/01/2020 | 5655 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 02/15/2021 | 5852 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 02/15/2021 | 5825 | Jonathan Afanador ... |     | -30,000.00 | [REDACTED] |
| Check                                 | 02/15/2021 | 5816 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 03/04/2021 | 5856 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 03/09/2021 | 5868 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 03/14/2021 | 5890 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Total Checks and Payments             |            |      |                       |     | [REDACTED] | [REDACTED] |
| Total Uncleared Transactions          |            |      |                       |     | [REDACTED] | [REDACTED] |
| Register Balance as of 03/31/2021     |            |      |                       |     | [REDACTED] | [REDACTED] |
| <b>New Transactions</b>               |            |      |                       |     |            |            |
| <b>Checks and Payments - 63 Items</b> |            |      |                       |     |            |            |
| Check                                 | 04/04/2021 | 5915 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5914 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5909 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5912 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5904 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5906 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5893 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5900 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5896 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5905 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5908 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5903 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5897 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5898 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5901 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5913 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5899 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5892 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5895 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5907 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5910 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5911 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 04/04/2021 | 5894 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5922 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5955 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5936 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5919 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5942 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5932 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5928 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5940 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5944 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5941 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5939 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5938 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5930 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5929 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5935 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5937 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5948 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5923 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5953 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5951 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5946 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5921 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5933 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5917 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5945 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5950 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5924 | [REDACTED]            |     | [REDACTED] | [REDACTED] |
| Check                                 | 05/03/2021 | 5927 | [REDACTED]            |     | [REDACTED] | [REDACTED] |

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05/09/21

**MCCA Risk Pool  
Reconciliation Detail  
Bangor Savings Bank New Acct, Period Ending 03/31/2021**

| Type                                 | Date       | Num  | Name       | Cir | Amount     | Balance    |
|--------------------------------------|------------|------|------------|-----|------------|------------|
| Check                                | 05/03/2021 | 5925 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5952 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5943 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5926 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5949 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5931 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5918 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5954 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5934 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5920 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5916 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Check                                | 05/03/2021 | 5947 | [REDACTED] |     | [REDACTED] | [REDACTED] |
| Total Checks and Payments            |            |      |            |     | [REDACTED] | [REDACTED] |
| <b>Deposits and Credits - 1 item</b> |            |      |            |     |            |            |
| Deposit                              | 04/07/2021 |      |            |     | [REDACTED] | [REDACTED] |
| Total Deposits and Credits           |            |      |            |     | [REDACTED] | [REDACTED] |
| Total New Transactions               |            |      |            |     | [REDACTED] | [REDACTED] |
| <b>Ending Balance</b>                |            |      |            |     | [REDACTED] | [REDACTED] |