

September 21, 2023

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

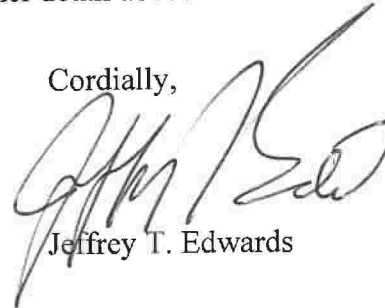
RE: Human Rights Defense Center v. MCCA Self-Funded Risk Management Pool - Docket No. CV-21-131

Dear Carol:

Enclosed herein is a Privilege Log that I have prepared in order to provide detail pertaining to the reason for the redactions to the documents produced by the MCCA Self-Funded Risk Management Pool pursuant to Justice Billings' Order in this case.

Please contact me if you require any further detail about the redactions or want to discuss the basis for the redactions further.

Cordially,



Jeffrey T. Edwards

JTE/ml
Enclosure

MAINE SUPREME JUDICIAL COURT
Sitting as the Law Court
Docket No. KEN-22-420

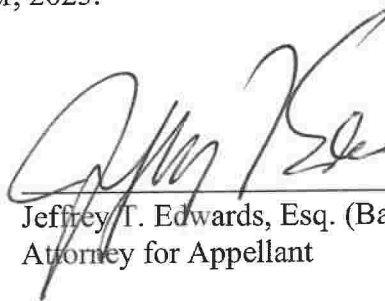
HUMAN RIGHTS DEFENSE CENTER,)
))
Appellee,)
))
v.)
))
MAINE COUNTY COMMISSIONERS)
ASSOCIATION SELF-FUNDED RISK)
MANAGEMENT POOL,)
))
Appellant.)

PRIVILEGE LOG

Nature of Communication	Basis of Privilege
1. The \$30,000 check (No. 5825) issued to Jonathan Afanador and McKee Law, LLC, PA on February 15, 2021 in settlement of Afanador’s claim against Kennebec County.	The account number and routing number on the settlement check were redacted on the basis of privacy.
2. The processed check (No. 5825) which was deposited by McKee Law, LLP, PA into its IOLTA account.	The account number and routing number on the settlement check were redacted on the basis of privacy. The Tax ID number for McKee Law, LLC, PA was redacted.
3. MCCA Risk Pool Voucher dated February 14, 2021 and recording the payment of \$30,000 to Jonathan Afanador and McKee Law, LLC	The Tax ID number for McKee Law, LLC, PA was redacted.
4. Bangor Savings Bank Summary of Account dated April 30, 2021 and recording the payment of \$30,000 for Check No. 5825	Information, including the account number, current balance and other transaction information unrelated to the payment of \$30,000 to Jonathan Afanador pursuant to Check No. 5825 are redacted. Also, payment amounts to persons or entities other than Jonathan Afanador were redacted.
5. MCCA Risk Pool Reconciliation Detail for the period ending February 28, 2021 and recording the payment of \$30,000 to Jonathan Afanador on February 15, 2021	MCCA Risk Pool Reconciliation Statement Detail information pertaining to payments made to persons other than Jonathan

Nature of Communication	Basis of Privilege
	Afanador as well as current balances with the Bangor Savings Bank were redacted.
6. MCCA Risk Pool Reconciliation Detail for the period ending April 30, 2021 and recording the payment to Jonathan Afanador in the amount of \$30,000 as a cleared transaction.	MCCA Risk Pool Reconciliation Detail information pertaining to payments to persons other than Jonathan Afanador as well as current account balances with the Bangor Savings Bank were redacted.
7. MCCA Risk Pool Reconciliation for the period ending March 31, 2021 and recording etc.	MCCA Risk Pool Reconciliation Detail information pertaining to payments to persons other than Jonathan Afanador as well as current account balances with the Bangor Savings Bank were redacted.

Dated at Portland, Maine this 21st day of September, 2023.



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