

Jeffrey T. Edwards
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September 1, 2023

VIA EMAIL

heiden@aclumaine.org

Zachary L. Heiden, Esq.

ALCU

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 Zach:

Pursuant to Justice Billings Order of December 5, 2022, I enclose herein the documentation pertaining to the \$30,000 payment made to Jonathan Afanador by the Risk Pool in settlement of his lawsuit against Kennebec County:

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;
2. The processed check (No. 5825) which was deposited by McKee Law, LLP, PA into its IOLTA account;
3. MCCA Risk Pool Voucher dated February 14, 2021 and recording the payment of \$30,000 to Jonathan Afanador and McKee Law, LLC;
4. Bangor Savings Bank Summary of Account dated April 30, 2021 and recording the payment of \$30,000 for Check No. 5825;
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; and
6. MCCA Risk Pool Reconciliation Detail for the period ending April 30, 2021 recording the payment to Jonathan Afanador in the amount of \$30,000 as a cleared transaction.

As we discussed, the documents that I am providing to you have been redacted to withhold personal identification information and account numbers. The documents have also been redacted to remove unrelated transactions. Please contact me with any questions regarding

PRETI FLAHERTY

Zachary L. Heiden, Esq.

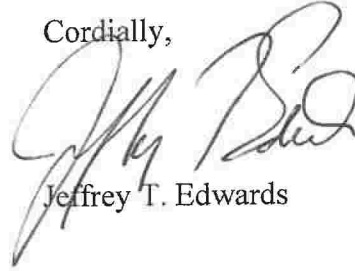
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September 1, 2023

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the redactions. As we also discussed, if you believe that there are any additional documents that should be produced to reflect the payments made to Jonathan Afanador or to otherwise comply with Justice Billings decision, please contact me.

Cordially,

A handwritten signature in black ink, appearing to read "Jeffrey T. Edwards". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Edwards" clearly distinguishable.

Jeffrey T. Edwards

JTE/ml

cc: Carol J. Garvan, Esq.

Enclosures

MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 04/30/2021

Type	Date	Num	Name	Clr	Amount	Balance
Beginning Balance						
Cleared Transactions						
Checks and Payments - 30 items						
Check	02/15/2021	5852	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5825	Jonathan Afanador ...	X	-30,000.00	[REDACTED]
Check	03/04/2021	5856	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	03/09/2021	5868	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	03/14/2021	5890	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5915	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5914	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5909	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5912	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5904	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5906	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5893	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5900	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5896	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5905	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5908	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5903	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5897	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5898	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5901	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5913	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5899	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5892	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5895	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5907	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5910	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5911	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/04/2021	5894	[REDACTED]	X	[REDACTED]	[REDACTED]
General Journal	04/09/2021	Transfer	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	04/20/2021	[REDACTED]	[REDACTED]	X	[REDACTED]	[REDACTED]
Total Checks and Payments					[REDACTED]	[REDACTED]
Deposits and Credits - 1 item						
Deposit	04/07/2021			X	[REDACTED]	[REDACTED]
Total Deposits and Credits					[REDACTED]	[REDACTED]
Total Cleared Transactions					[REDACTED]	[REDACTED]
Cleared Balance					[REDACTED]	[REDACTED]
Uncleared Transactions						
Checks and Payments - 2 items						
Check	10/01/2020	5655	[REDACTED]		[REDACTED]	[REDACTED]
Check	02/15/2021	5816	[REDACTED]		[REDACTED]	[REDACTED]
Total Checks and Payments					[REDACTED]	[REDACTED]
Total Uncleared Transactions					[REDACTED]	[REDACTED]
Register Balance as of 04/30/2021					[REDACTED]	[REDACTED]
New Transactions						
Checks and Payments - 64 items						
Check	05/03/2021	5922	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/03/2021	5966	[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]

MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 04/30/2021

Type	Date	Num	Name	Ctr	Amount	Balance
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	5946	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/03/2021	5951	[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]
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	5931	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/03/2021	5949	[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]
Check	05/29/2021	5962	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5966	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5957	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5969	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5960	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5968	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5959	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5965	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5967	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5963	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5964	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5961	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5956	[REDACTED]		[REDACTED]	[REDACTED]
Check	05/29/2021	5958	[REDACTED]		[REDACTED]	[REDACTED]
Total Checks and Payments					[REDACTED]	[REDACTED]
Deposits and Credits - 2 items						
Deposit	05/15/2021				[REDACTED]	[REDACTED]
Deposit	05/15/2021				[REDACTED]	[REDACTED]
Total Deposits and Credits					[REDACTED]	[REDACTED]
Total New Transactions					[REDACTED]	[REDACTED]
Ending Balance					[REDACTED]	[REDACTED]

MCCA SELF-FUNDED RISK MANAGEMENT POOL

4 Gabriel Drive, Suite 2
Augusta, Maine 04330

Bangor
Savings Bank
Bangor, Maine
52-7438/2112

5825

2/15/2021

PAY TO THE ORDER OF Jonathan Afanador and McKee Law, LLC P.A.

\$ **30,000.00

DOLLARS

Thirty Thousand and 00/100*****

McKee Law, LLC P.A.
133 State Street
Augusta ME 04330



[Handwritten Signature]

AUTHORIZED SIGNATURE

MP

MEMO

Clin. 002867-P1-01; Full and final settlement of all cla/m/5



MCCA SELF-FUNDED RISK MANAGEMENT POOL

5825

2/15/2021

30,000.00

Jonathan Afanador and McKee Law, LLC P.A.
Claims:30th Loss Year:Kennebec 06 on 9106 Claimant:: Jonathan Afanador

Bangor Savings Bank Clin. 002867-P1-01; Full and final settlement of al

30,000.00

Security features included. Details on back.

5825

MCCA SELF-FUNDED RISK MANAGEMENT POOL
4 Gabriel Drive, Suite 2
Augusta, Maine 04330

Bangor Savings Bank
Bangor, Maine
52-7438/2112

2/15/2021

PAY TO THE ORDER OF Jonathan Afanador and McKee Law, LLC P.A.

\$ **30,000.00

Thirty Thousand and 00/100 DOLLARS

McKee Law, LLC P.A.
133 State Street
Augusta ME 04330

Security features include: Debits on back

MEMO

Clm. 002867-PI-01; Full and final settlement of all cla



[Handwritten Signature]
Authorized SIGNATURE

#005825# [Redacted]

ENDORSE HERE
X *[Signature]*

FOR DEPOSIT ONLY
McKee Law LLC P.A./olita

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

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www.federalreserve.gov

Augusta
PM-TirID=1301
494139

MCCA Risk Pool Voucher

Date: 2/14/2021

Adjuster: Malcolm Ulmer

DateOfLoss: 8/18/2019

ClaimsKey: 002867-PI-01

ClaimsID: 3364

ControlNumber: 9106

VouchersID: 9515

Payee: Jonathan Afanador and McKee Law, LLC,
P.A.
133 State Street
Augusta, ME 04330

TaxIDNumber:



Message:

Full and final settlement of all claims

Mail To: McKee Law, LLC, P.A.
133 State Street
Augusta, ME 04330

Memo line on Check:

Clim. 002867-PI-01; Full and final settlement of all claims

LossYear: 30 **ClientKey:** 6 **Client:** Kennebec County

Claimant: Jonathan Afanador

Item	Loss	Expense	Paycode
# 1.	\$30,000.00	\$0.00	002 Settlement or multiple payees
	\$30,000.00	\$0.00	Total: \$30,000.00

Malcolm Ulmer
2/14/2021

Bangor Savings Bank

You matter more.

Date 4/30/21
Primary Account
Enclosures

Page 1

11122 1 AV 0.398
MAINE COUNTY COMMISSIONERS ASSOC
SELF-FUNDED RISK MANAGEMENT POOL 11122
4 GABRIEL DR STE 2
AUGUSTA ME 04330-8166



SUMMARY OF ACCOUNTS

ACCOUNT NUMBER	ACCOUNT TITLE	CURRENT BALANCE	ENCLOSURES
[REDACTED]	BUSINESS COMPLETE	[REDACTED]	

CHECKING ACCOUNTS

ACCOUNT TITLE: MAINE COUNTY COMMISSIONERS ASSOC
SELF-FUNDED RISK MANAGEMENT POOL

BUSINESS COMPLETE	Truncated Items
Account Number [REDACTED]	Statement Dates 4/01/21 thru 5/02/21
Previous Balance [REDACTED]	Days In This Statement Period 32
1 Deposits/Credits [REDACTED]	Average Ledger [REDACTED]
2 Withdrawals [REDACTED]	Average Collected [REDACTED]
28 Checks [REDACTED]	
Service Charges .00	
Interest Paid .00	
Current Balance [REDACTED]	

DEPOSITS AND OTHER CREDITS

DATE	DESCRIPTION	AMOUNT	REFERENCE
4/07	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL DEPOSITS AND OTHER CREDITS		[REDACTED]	

WITHDRAWALS

DATE	DESCRIPTION	AMOUNT	REFERENCE
4/12	[REDACTED]	[REDACTED]	[REDACTED]
4/20	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL WITHDRAWALS		[REDACTED]	

4/29/21

www.bangor.com
Phone Banking 1.888.263.3099

Bangor Savings Bank

You matter more!

Date 4/30/21
Primary Account
Enclosures

Page 2

BUSINESS COMPLETE

[REDACTED] (Continued)

CHECKS

DATE	CHECK NO	AMOUNT	TRACE NO	DATE	CHECK NO	AMOUNT	TRACE NO
4/30	5825	30,000.00	310003474	4/14	5901	[REDACTED]	[REDACTED]
4/06	5852*	[REDACTED]	[REDACTED]	4/07	5903*	[REDACTED]	[REDACTED]
4/19	5856*	[REDACTED]	[REDACTED]	4/07	5904	[REDACTED]	[REDACTED]
4/06	5868*	[REDACTED]	[REDACTED]	4/07	5905	[REDACTED]	[REDACTED]
4/19	5890*	[REDACTED]	[REDACTED]	4/07	5906	[REDACTED]	[REDACTED]
4/14	5892*	[REDACTED]	[REDACTED]	4/07	5907	[REDACTED]	[REDACTED]
4/14	5893	[REDACTED]	[REDACTED]	4/07	5908	[REDACTED]	[REDACTED]
4/07	5894	[REDACTED]	[REDACTED]	4/07	5909	[REDACTED]	[REDACTED]
4/14	5895	[REDACTED]	[REDACTED]	4/07	5910	[REDACTED]	[REDACTED]
4/19	5896	[REDACTED]	[REDACTED]	4/07	5911	[REDACTED]	[REDACTED]
4/14	5897	[REDACTED]	[REDACTED]	4/07	5912	[REDACTED]	[REDACTED]
4/12	5898	[REDACTED]	[REDACTED]	4/13	5913	[REDACTED]	[REDACTED]
4/12	5899	[REDACTED]	[REDACTED]	4/13	5914	[REDACTED]	[REDACTED]
4/12	5900	[REDACTED]	[REDACTED]	4/07	5915	[REDACTED]	[REDACTED]

* checks missing from sequence

TOTAL # OF CHECKS	28	TOTAL \$ OF CHECKS	1,187,828.47
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BALANCE BY DATE

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
4/01	[REDACTED]	4/12	[REDACTED]	4/19	[REDACTED]
4/06	[REDACTED]	4/13	[REDACTED]	4/20	[REDACTED]
4/07	[REDACTED]	4/14	[REDACTED]	4/30	[REDACTED]

6:46 AM
04/11/21

MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 02/28/2021

Type	Date	Num	Name	Clr	Amount	Balance
Beginning Balance						
Cleared Transactions						
Checks and Payments - 72 items						
Check	01/06/2021	5773	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/06/2021	5771	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5793	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5780	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5791	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5786	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5797	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5784	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5803	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5806	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5778	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5801	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5802	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5782	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5805	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5804	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5792	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5800	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5779	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5789	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5783	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5790	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5796	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5785	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5798	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5799	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5777	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5781	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5794	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	01/27/2021	5787	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5851	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5811	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5849	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5819	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5832	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5815	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5831	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5828	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5845	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5838	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5844	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5848	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5826	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5833	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5840	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5837	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5836	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5839	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5835	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5808	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5820	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5841	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5809	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5827	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5823	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5830	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5821	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5829	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5822	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5834	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5843	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5842	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5817	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5814	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5810	[REDACTED]	X	[REDACTED]	[REDACTED]

6:46 AM
04/11/21

MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 02/28/2021

Type	Date	Num	Name	Clr	Amount	Balance
Check	02/15/2021	5846	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5847	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5807	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/15/2021	5812	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	02/16/2021	5853	[REDACTED]	X	[REDACTED]	[REDACTED]
General Journal	03/04/2021	JE 0122	[REDACTED]	X	[REDACTED]	[REDACTED]
General Journal	03/09/2021	JE 0123	[REDACTED]	X	[REDACTED]	[REDACTED]
Total Checks and Payments						
Deposits and Credits - 7 Items						
Deposit	02/01/2021			X	[REDACTED]	[REDACTED]
Deposit	02/17/2021			X	[REDACTED]	[REDACTED]
General Journal	02/18/2021	Transfer		X	[REDACTED]	[REDACTED]
Check	03/04/2021	5861	[REDACTED]	X	[REDACTED]	[REDACTED]
Check	03/09/2021	5867	[REDACTED]	X	[REDACTED]	[REDACTED]
General Journal	03/09/2021	JE 01...	[REDACTED]	X	[REDACTED]	[REDACTED]
General Journal	03/09/2021	JE 01...	[REDACTED]	X	[REDACTED]	[REDACTED]
Total Deposits and Credits						
Total Cleared Transactions						
Cleared Balance						
Uncleared Transactions						
Checks and Payments - 11 items						
Check	10/01/2020	5655	[REDACTED]		[REDACTED]	[REDACTED]
Check	12/16/2020	5745	[REDACTED]		[REDACTED]	[REDACTED]
Check	01/27/2021	5788	[REDACTED]		[REDACTED]	[REDACTED]
Check	01/27/2021	5795	[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	5818	[REDACTED]		[REDACTED]	[REDACTED]
Check	02/15/2021	5850	[REDACTED]		[REDACTED]	[REDACTED]
Check	02/15/2021	5816	[REDACTED]		[REDACTED]	[REDACTED]
Check	02/15/2021	5824	[REDACTED]		[REDACTED]	[REDACTED]
Check	02/15/2021	5813	[REDACTED]		[REDACTED]	[REDACTED]
Total Checks and Payments						
Total Uncleared Transactions						
Register Balance as of 02/28/2021						
New Transactions						
Checks and Payments - 60 Items						
Check	03/04/2021	5863	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5856	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5860	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5865	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5858	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5854	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5866	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5864	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5857	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5862	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5859	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/04/2021	5855	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/09/2021	5868	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5890	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5891	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5871	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5874	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5873	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5885	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5887	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5876	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5870	[REDACTED]		[REDACTED]	[REDACTED]
Check	03/14/2021	5875	[REDACTED]		[REDACTED]	[REDACTED]

6:46 AM
04/11/21

MCCA Risk Pool Reconciliation Detail

Bangor Savings Bank New Acct, Period Ending 02/28/2021

Type	Date	Num	Name	Clr	Amount	Balance
Check	03/14/2021	5883	Monaghan Leahy, LLP			
Check	03/14/2021	5880	Monaghan Leahy, LLP			
Check	03/14/2021	5869	Wheeler & Arey, P.A.			
Check	03/14/2021	5882	Monaghan Leahy, LLP			
Check	03/14/2021	5886	Monaghan Leahy, LLP			
Check	03/14/2021	5881	Monaghan Leahy, LLP			
Check	03/14/2021	5878	Lincoln County			
Check	03/14/2021	5872	Wheeler & Arey, P.A.			
Check	03/14/2021	5879	Monaghan Leahy, LLP			
Check	03/14/2021	5889	Carroll's Auto Sales,...			
Check	03/14/2021	5888	Colonial Adjustment,...			
Check	03/14/2021	5877	Bishop Adjustment ...			
Check	03/14/2021	5884	Monaghan Leahy, LLP			
Check	04/04/2021	5915	MLU, Inc.			
Check	04/04/2021	5914	Maine County Com...			
Check	04/04/2021	5909	Wheeler & Arey, P.A.			
Check	04/04/2021	5912	Wheeler & Arey, P.A.			
Check	04/04/2021	5904	Wheeler & Arey, P.A.			
Check	04/04/2021	5906	Wheeler & Arey, P.A.			
Check	04/04/2021	5893	Somerset County			
Check	04/04/2021	5900	Richardson Whitma...			
Check	04/04/2021	5896	Oxford County			
Check	04/04/2021	5905	Wheeler & Arey, P.A.			
Check	04/04/2021	5908	Wheeler & Arey, P.A.			
Check	04/04/2021	5903	Wheeler & Arey, P.A.			
Check	04/04/2021	5902	Pape Chevrolet, Inc.			
Check	04/04/2021	5897	Consolidated Comm...			
Check	04/04/2021	5898	Monaghan Leahy, LLP			
Check	04/04/2021	5901	Somerset County			
Check	04/04/2021	5913	Libby O'Brien Kingsl...			
Check	04/04/2021	5889	Penobscot County			
Check	04/04/2021	5892	Bishop Adjustment ...			
Check	04/04/2021	5895	Bishop Adjustment ...			
Check	04/04/2021	5907	Wheeler & Arey, P.A.			
Check	04/04/2021	5910	Wheeler & Arey, P.A.			
Check	04/04/2021	5911	Wheeler & Arey, P.A.			
Check	04/04/2021	5894	Wheeler & Arey, P.A.			
Total Checks and Payments						
Deposits and Credits - 6 Items						
Deposit	03/01/2021					
Deposit	03/06/2021					
Deposit	03/10/2021					
Deposit	03/16/2021					
Deposit	03/28/2021					
Deposit	04/07/2021					
Total Deposits and Credits						
Total New Transactions						
Ending Balance						

Jeffrey T. Edwards
jedwards@preti.com
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:

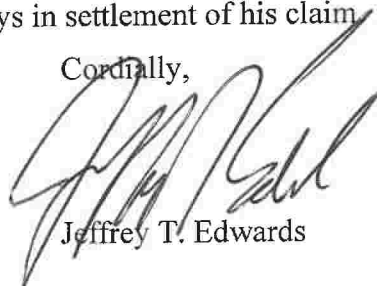
In response to your recent email, I am enclosing the following documentation as a supplement to the documents that were provided on September 1, 2023:

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
Beginning Balance						
Cleared Transactions						
Checks and Payments - 42 Items						
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		
Total Checks and Payments						
Deposits and Credits - 9 Items						
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		
Total Deposits and Credits						
Total Cleared Transactions						
Cleared Balance						

3:10 PM
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
Uncleared Transactions						
Checks and Payments - 7 Items						
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]
New Transactions						
Checks and Payments - 63 Items						
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]

3:10 PM

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]
Deposits and Credits - 1 item						
Deposit	04/07/2021				[REDACTED]	[REDACTED]
Total Deposits and Credits					[REDACTED]	[REDACTED]
Total New Transactions					[REDACTED]	[REDACTED]
Ending Balance					[REDACTED]	[REDACTED]

Jeffrey T. Edwards
jedwards@preti.com
207.791.3209

September 27, 2023

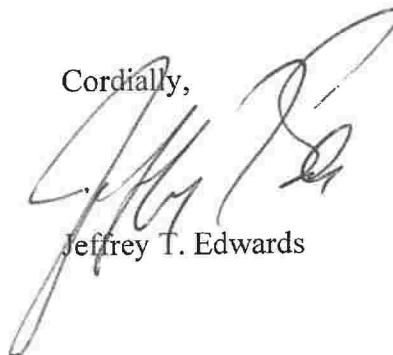
Carol J. Garvan, Esq.
ACLU
P.O. Box 7860
Portland, ME 04112-760

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

Dear Carol:

Following up on our recent discussion regarding compliance with the Order of Justice Billings, this is to confirm that the \$30,000 payment to Jonathan Afanador and his attorneys was the only payment made by the Risk Pool in settlement of the civil rights claim asserted by Jonathan Afanador against Kennebec County. There was no separate payment made to anyone else, including the attorneys representing Jonathan Afanador.

Cordially,



Jeffrey T. Edwards

JTE/ml
Enclosure
cc: Zachary L. Heiden, Esq.