



OFFICE OF THE MAYOR

June 28, 2021

MAYORAL STATEMENT REGARDING BOARD OF HEALTH CONCERNS

I recognize that this past year has been uniquely difficult for all of us. We have faced an unprecedented pandemic and we have lived through a lengthy state of emergency. As your mayor, I continue to work seven days a week on behalf of the citizens of Gloucester; I will not turn my back on anyone.

During the pandemic, I was singularly focused on 1) getting Gloucester citizens tested and then 2) getting Gloucester residents vaccinated. We are public servants, and our responsibility is to the residents of Gloucester - public safety and public health are our first priorities. We have high expectations, especially in a pandemic, and we **MUST** take care of our residents. Nothing else matters in my mind but keeping our people safe.

Despite these extraordinary circumstances, Health Director Karin Carroll has taken issue with me about how the pandemic response was handled. I firmly and strongly deny Ms. Carroll's accusations. While I was committed to getting Gloucester residents vaccinated, I did not engage in contract tracing and I did not dispense clinical advice (I was a liaison). Further, I never suggested that Ms. Carroll hold clinics and pocket the money. That is outrageous. In fact, Ms. Carroll was paid a \$15,000 stipend on November 24, 2020, one of the only bonuses issued during the pandemic.

We all worked hard to get vaccine clinics locally. I wanted vaccine clinics in Gloucester as did Senator Bruce Tarr. I did not want people to have to go to Danvers, Boston, or Gillette Stadium, but that is in fact what happened. With the help of the COVID Angels, many people secured vaccine appointments. I did not create the COVID Angels - but their work was critically important and saved lives; they were officially recognized by state leaders and they are true heroes. I continue to support regional vaccinations; they are critically important (why should we have to go off-island to get a vaccine?).

Even though I was high-risk given the work I do with seniors, I was clearly qualified for a vaccine and that is why I asked for one. Ultimately, after significant pushback, the Health Director finally agreed. But given her extensive opposition I thought it best to turn the vaccine down. Instead, I contacted Lahey and quickly received a vaccine through them. It is my understanding that I was one of the last mayors to receive a vaccine in the state, but it mattered more that I could continue to help people. This truly wasn't about me.

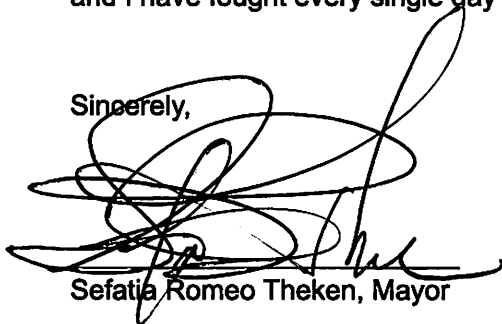
I worked hard for the citizens of Gloucester. I leveraged every resource and relationship I had to get people tested and vaccinated; I did it to save lives. I am proud that I was able to secure a mobile unit on behalf of the citizens of Gloucester.

To say that I violated HIPAA is silly - it was a pandemic and a state of emergency - it was about saving lives, pure and simple. I am proud of the work that I have done in healthcare advocacy; I have worked for over 25 years helping support seniors, low-income and non-English speaking populations receive support and care. I have worked with everyone from the late Senator Ted Kennedy on children's health care through to Governor Baker on advocacy for teachers to receive vaccinations in earlier phases. During that time, I have never been accused of violating anything... until recently.

I was advised that it is questionable as to whether HIPAA was even applicable during a state of emergency. If it was, I got advice from numerous lawyers that I did not violate HIPAA - people reached out to me, I did not reach out to them. But, truly, what is more important: health care privacy or saving someone's life during a pandemic. I believe it is saving people's lives. Ultimately, there is no toxic workplace in City Hall but, given Ms. Carroll's concerns I forwarded her April 22, 2021, letter directly to the Attorney General.

I have had numerous conversations - as well as board meetings, webinars and roundtables - with Ms. Carroll and the Board of Health and I have, each time, agreed to help them and continue to work with them. I even agreed to the six points in Ms. Carroll's letter. To put it simply, the pandemic was very hard on all of us. As I have said before, my single focus was on Gloucester and its citizens. I am proud of what my administration has done. There was no handbook on the pandemic so, throughout, I remained committed to the citizens of Gloucester and I have fought every single day on their behalf and that is what I believe a mayor should do.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sefatia Romeo Theken', written over a horizontal line.

Sefatia Romeo Theken, Mayor

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April 22, 2021

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Re: Karin Carroll complaint

By electronic mail

Dear Attorney Payson and Attorney Kesten:

I represent Karin Carroll, M.P.H., public health director of the City of Gloucester. The purpose of this letter is to provide notice pursuant to G.L.c. 149 §185, the Massachusetts Whistleblower Law, that Ms. Carroll reasonably believes Mayor Sefatia Romeo Theken's behavior poses a risk to public health and/or that Mayor Theken may have violated the Conflicts of Interest law. It is my understanding that Mr. Payson represents the city as general counsel and that Mr. Kesten is Mayor Theken's personal attorney.

At the Board of Health meeting on April 8, 2021, Ms. Carroll raised general questions about Mayor Theken's involvement in Covid response efforts. She presented these concerns at the request of the Board of Health chair. Mayor Theken made it clear that she does not believe she has done anything wrong and that she intends to continue her behavior.¹ Ms. Carroll is deeply troubled by Mayor Theken's misunderstanding of the boundary between the Health Department and other city departments; Mayor Theken's failure to abide by the state's guidelines for vaccine eligibility; Mayor Theken's access to and use of private health information; and Mayor Theken's relationship with certain private businesses.

¹ "Mayor Theken stated she will not turn her back on anybody. ..." Board of Health draft minutes, April 8, 2021.

Below is a summary of relevant incidents showing Mayor Theken's misuse of scarce public health resources and the laws that may be implicated. This narrative is not a comprehensive list but represents a sample of the mayor's interference with the Health Department's mission and operation.

A. Contact tracing

On or about November 30, 2020, a citizen complained to the Health Department that Mayor Theken was disseminating the purported results of the citizen's Covid test.² The citizen was irate.³

Mayor Theken called the citizen to apologize. She told the citizen that the report came from the state Department of Public Health and then, in a second call, asked the citizen not to tell anyone where she got the information. Later that day, the mayor gave Ms. Carroll three different explanations for where she got the citizen's information: from a family member, from the state Department of Public Health, and from "lab results." The state Department of Public Health does not issue daily reports of individuals' test results to municipalities.

Mayor Theken admitted to Ms. Carroll that she was receiving daily reports disclosing Covid test results for individual Gloucester residents and that she used this information to perform what she considered contact tracing. Ms. Carroll reasonably inferred that the testing information was provided by a private medical facility in Beverly.⁴

The chair of the Board of Health asked Ms. Carroll to report the incident to the state Department of Public Health, which she did.

On the same day as this incident, Mayor Theken approved a \$15,000 stipend for Ms. Carroll. The purpose of the stipend was to recognize Ms. Carroll's increased responsibilities resulting from the pandemic, working seven days a week for months. The stipend request had been pending for weeks.⁵

Mayor Theken acknowledged at the April 8 Board of Health meeting that she performs contact tracing. By contact tracing without adequate training, Mayor Theken is endangering the public health and impeding the local Health Department's work.⁶

² Former acting Chief Administrative Officer Vanessa Krawcyk witnessed the Mayor admitting to Ms. Carroll that she had shared the citizen's test results with others.

³ The information the mayor was disseminating about the citizen was incorrect.

⁴ The last name of the person managing the private medical facility is the same as a relative by marriage to the mayor. I do not know if the health-care facility contact person is actually related to the mayor.

⁵ As another way of compensating Ms. Carroll for her hard work, Mayor Theken suggested that the Health Department hold clinics at local businesses for a fee and Ms. Carroll could pocket the money. Ms. Carroll declined.

⁶ Elsewhere in this letter, I discuss translation services Mayor Theken provides to Sicilian-speaking Gloucester residents. The Commonwealth has a service that provides Covid-related translation services by trained volunteers. To the best of my knowledge, Mayor Theken has not been specially trained to provide this service.

Furthermore, Ms. Carroll believes Mayor Theken has been dispensing incorrect clinical advice during the contract tracing. Mayor Theken also incorrectly stated during a School Committee meeting that antigen testing is not accurate. Disseminating inaccurate information interferes with the Health Department's mission and operation.

In addition, Mayor Theken referred city employees and private citizens to the private Beverly medical facility for testing, even against the advice of the Health Department that such testing was unnecessary in certain cases. She offered this service to employees of the Public Works Department but not to employees in other departments who were clamoring for tests, such as teachers. It is not clear who paid for the tests, since health insurance companies usually pay only for tests ordered by a medical professional or when someone has been exposed to Covid or shows Covid symptoms.

B. Access to vaccines for others

The state has issued eligibility guidelines for vaccines, in three phases. The guidelines were developed by an advisory group comprising medical professionals, public-health experts, elected officials, community leaders and infectious-disease specialists. Within each phase are subgroups listed by priority. For example, in Phase 1, clinicians providing direct, Covid-facing care had a higher priority than home-based health-care workers. In Phase 2, people who were 75 or older were ahead of grocery store workers.

Mayor Theken has spent countless hours arranging vaccines appointments, contrary to her assertion at the April 8, 2021, Board of Health meeting that she does not make appointments. On or about March 15, 2021, Ms. Carroll learned that Mayor Theken had obtained vaccines appointments for Department of Public Works employees⁷, school custodians and school bus drivers, regardless of their priority level. Mayor Theken assured Ms. Carroll that she was making sure the employees were eligible for the shots. On or about March 18, 2021, a DPW employee told Ms. Carroll that the Mayor had called him to say a vaccine shot was available if he could get over to an out-of-town pharmacy. The employee needed a ride to the pharmacy so the mayor told another DPW employee to drive him. The employee told Ms. Carroll he did not think he eligible for the vaccine.

The mayor improperly favored one department over other city employees who work in public-facing jobs, such as librarians and inspectors. The Health Department strictly follows the priority groups set by the state. Using any other criteria for scheduling shots distorts the purpose and effectiveness of the public health system.

Mayor Theken's relationship with the out-of-town pharmacy raises additional concerns. Without consulting the Health Department, Mayor Theken regularly arranged vaccines provided by the pharmacy. In March 2021, the state Department of Health and Human Services cut off the pharmacy's access to vaccine doses because of the way the doses were being mismanaged,

⁷ Ms. Theken's husband works for the Department of Public Works. I do not know if or when he received a vaccine.

leaving a number of people without access to second shots. Mayor Theken urgently sought 150 vaccine doses from MaryLou Sudders, Secretary of the Massachusetts Department of Health and Human Services, which were approved. The Gloucester Health Department designated an employee to drive to Brookline to pick up the doses.

Between March 24 and March 26, 2021, Gloucester Health Department employees scrambled to ascertain who was entitled to the second shots. The out-of-town pharmacy was not able to provide a definitive list of eligible persons. By March 26, 2021, the Gloucester Health Department still did not have enough information to provide the shots.

On March 30, 2021, Ms. Carroll informed the state Department of Public Health, the chair of the Gloucester Board of Health, and Mayor Theken that she had received a list of 82 names from the pharmacy, that several of the people on the list had already received second dose appointments elsewhere, and that she could no longer devote department resources to contacting every person on the list. She said the state Department of Public Health had agreed to assist with scheduling second doses for whoever needed them.

Ms. Carroll reasonably believes that several people on the pharmacy's list, including a member of the Mayor's staff and a member of the School Committee, and their respective spouses, were below the appropriate priority level and should not have been scheduled for shots because they had Internet access and could schedule the shots themselves. These appointments were intended for people without Internet access.

In addition, Mayor Theken created a local volunteer group called Covid Angels to obtain vaccine appointments for people who provide the Angels with their personal information. The Angels promote themselves as affiliated with the state's Medical Reserve Corps ("MRC") but according to MRC's director, they are not recognized or supervised by the MRC. The MRC hotline was intended for people without Internet access, not for the general public. It appears the Covid Angels' vaccine appointments are made without consideration for priority status or Internet access. The Health Department recently announced a vaccine clinic at the Rose Baker Senior Center; all the appointments were quickly booked by the Covid Angels, taking away appointments from people without Internet access. While Ms. Carroll appreciates the dedication of the Covid Angels, she is tasked with following the state's guidelines on vaccine access.

Sen. Bruce Tarr is organizing a regional network of local communities to obtain vaccines through the out-of-town pharmacy, including Essex, Rockport, Wenham, Haverhill, Manchester and Ipswich. Ms. Carroll declined to participate because of her concerns about the pharmacy's history of mismanaging vaccines and whether the shots are given in accordance with the state's eligibility requirements. In addition, it is not clear that the pharmacy's access to vaccines has been restored. The Mayor has publicly criticized the Health Department for declining to participate.

C. Vaccine for herself

On January 26, 2021, an employee of the Gloucester Health Department asked the state Department of Public Health whether SHINE counselors were eligible for vaccines. At the time, during Phase 1 of the vaccine rollout, the local department was inundated with requests for scarce vaccines. SHINE counselors provide free health insurance information to income-eligible Massachusetts residents. Mayor Theken has been a SHINE counselor for many years and has continued to provide this service during her time as mayor.

A state Department of Public Health employee replied that insurance counselors were not eligible for vaccines because they were not health-care workers. Ms. Carroll told Mayor Theken that the state had said she was not eligible.

Later that day, Mayor Theken sent Ms. Carroll an email in which she asserted that as a SHINE counselor, she was regularly seeing “patients” in their homes, at her City Hall office and at the grocery store; that she was providing translation services for Sicilian-speaking persons who needed assistance with the medical system; and that, as a mayor who deals regularly with the public, she should be automatically qualified. Attached is a copy of that email, with private medical information redacted. See Attachment A.

It is Ms. Carroll’s understanding that Mayor Theken appealed to Governor Baker, unsuccessfully. Mayor Theken also contacted an employee of Beverly Hospital. On January 27, 2021, Mayor Theken forwarded an email to Ms. Carroll in which the Beverly Hospital employee told the Mayor that she should be eligible for a vaccine as a “community health care worker.”⁸

At 8:20 p.m. on January 27, 2021, Mayor Theken applied online for the vaccine. She described herself as “a health-care worker (clinical or non-clinical) including in home care worker,” and attested under the penalties of perjury that she belonged to a Phase 1 priority group. Attached, please find a list of who was eligible for a vaccine in Phase 1. It is clear that Phase 1 was intended for people providing direct medical services in health-care settings.

At the last minute, Mayor Theken cancelled her vaccine appointment. This is yet another example of the mayor wasting department resources and distracting Health Department employees from their mission.

D. Mobile unit

In October 2021, there was an isolated Covid outbreak at a local religious/cultural establishment. Without consulting the Health Department, Mayor Theken asked Secretary Sudders and Governor Baker for a mobile testing unit. The testing unit was sent to Stage Fort Park.

Such units are in high demand and access to them is a rare opportunity. If she had been asked, Ms. Carroll would have asked the mayor not to request the mobile unit for such an

⁸ It is not clear in what capacity the Beverly Hospital employee was authorized to offer this opinion.

isolated outbreak but rather, to reserve the mobile unit for a time when there was widespread community transmission. In fact, the Health Department has not been able to schedule a mobile unit for a return visit.

E. Toxic workplace

Mayor Theken has pressed Health Department employees for private health information about individuals, to the point where employees would not take her calls and worried about losing their licenses. During the November 2020 incident where the mayor disseminated private medical information about the citizen discussed in Section A above, Mayor Theken called Health Department employees to the point where the employees complained to Ms. Carroll.

Ms. Carroll herself has been subjected to the same bullying from the mayor that other department heads report. On December 21, 2018, Ms. Carroll filed a written complaint with the city Human Resources Department about the mayor's treatment of a Health Department employee. At a meeting on December 19, 2018, the mayor berated and swore at the employee in front of Ms. Carroll and two members of the public. More recently, after Ms. Carroll complained to the Human Resources Director about the mayor's treatment of her, Mayor Theken referred to Ms. Carroll as "that little bitch" to another city employee. Furthermore, on or about March 30, 2021, Mayor Theken told a local business owner to forward personal information about his employees to her so she could schedule their vaccines "because the idiots working for the city couldn't get it done."

F. Potential legal issues

Local Boards of Health have broad authority to adopt and enforce regulations to protect public health. *G.L.c. 111 §31; Board of Health of Woburn v. Sousa*, 338 Mass. 547 (1959); *Loyal Order of Moose, Inc. Yarmouth Lodge #2270 v. Board of Health of Yarmouth*, 439 Mass. 597 (2003). Ms. Carroll reports directly to the Gloucester Board of Health. This separate chain of command was created, in part, to limit the politicization of health decisions. Although Mayor Theken cannot terminate Ms. Carroll's employment, she can affect Ms. Carroll's ability to perform her job by controlling the department's access to funds and staff.

The mayor's ongoing interference with the department's mission and operation implicate the following laws. The Massachusetts Whistleblower Act states, in relevant part:

(b) An employer shall not take any retaliatory action against an employee because the employee does any of the following:

(2) Provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any violation of law, or a rule or regulation promulgated pursuant to law, or activity, policy or practice which the employee reasonably believes poses a risk to public health, safety or the environment by the employer, or by another

employer with whom the employee's employer has a business relationship.

Without a doubt, the mayor's behavior poses a risk to public health. She is essentially running a separate health department, without proper training, criteria, or oversight. She is using scarce health resources to benefit herself, her acquaintances, and possibly her family; she does not consult with public health professionals about the use of these resources; she repeatedly interferes with Health Department employees' ability to do their jobs; she provides incorrect health information to the public; and she invaded the privacy of an unknown number of Gloucester residents.

It is less clear whether Mayor Theken has violated G.L.c 268A §2, which states, in relevant part:

(b) Whoever, being a state, county or municipal employee or a member of the judiciary or a person selected to be such an employee or member of the judiciary, directly or indirectly, corruptly asks, demands, exacts, solicits, seeks, accepts, receives or agrees to receive anything of value for himself or for any other person or entity, in return for

(1) being influenced in his performance of any official act or any act within his official responsibility, or

...

(3) being induced to do or omit to do any acts in violation of his official duty.

I am not aware of any evidence that Mayor Theken has personally profited from any of the incidents described above. However, the phrase "anything of value" does not necessarily have to be cash.⁹ She was approved for a valuable vaccine at a time when vaccines were in short supply, even though city and state public health officials told her she was not eligible.

The mayor may also have violated HIPAA. If she is a health-care worker, as she claimed under the pains of perjury, HIPAA's restrictions and penalties would apply. It is also worth noting that a handbook for SHINE counselors issued by the state Department of Elder Affairs in 2014 says SHINE counselors must comply with HIPAA.

Conclusion

Mayor Theken argues she is merely helping people navigate the health-care system. She further argues that sometimes, she is acting as a SHINE counselor instead of mayor. Such self-serving rationalizations do not excuse favoritism and, potentially, nepotism; inappropriate

⁹ *Com. v. Canon*, 373 Mass. 494, 498 (1977).

businesses relationships; disseminating inaccurate information and citizens' private health information; promoting inequitable access to scarce medical resources; or harming the mission, reputation, and morale of the city's Health Department.

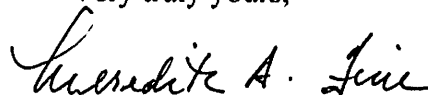
Ms. Carroll has complained about the Mayor's activities directly to the mayor, as well as to Attorney Payson and the city's Human Resources Department, with no discernible effect. In addition, the mayor made it clear on April 8 she does not intend to stop her behavior. Accordingly, Ms. Carroll feels duty-bound to the citizens of Gloucester and to the Health Department employees to press forward with her concerns.

The Whistleblower Law requires notice and an opportunity for Mayor Theken to correct her behavior. The correction is quite simple: Mayor Theken must immediately cease her involvement in public-health activities except at the Health Department's request. On Ms. Carroll's behalf, I request written acknowledgement from Mayor Theken as follows:

- She will cease setting up vaccine appointments;
- She will cease her attempts at contact tracing;
- She will promptly refer all vaccine- and testing-related questions to the Health Department;
- She will not denigrate Health Department employees or the Health Department in general to city employees or to the public;
- She will cease contacting Health Department employees except for the Director or the Assistant Director; and,
- She will certify that she understands and respects the boundaries between the Health Department and other city departments.

If Mayor Theken does not deliver this written acknowledgment to me by May 4, 2021, I intend to read this letter into the record at the May 6, 2021, Board of Health meeting and ask the Board to refer this matter to Attorney General Healey for investigation.

Very truly yours,



Meredith A. Fine

Attachment A

Email from Mayor Sefatia Romeo Theken dated January 26, 2021:

When I made my appointment, it was one of the criteria, if it changed Shame on me, I should have done it first time. I may be mayor but I and a certified SHINE through Elder Affairs, licensed Community Health Worker from State of MA. I have Volunteered my services since 2015, COVID or not I have been hands on with my elderly as you know in the beginning as a screener, as SHINE councilor, translator in person for Minority members, when they lost their lives(I can get Greely's Funeral Home and Father Jim Achadinha to state also that we didn't know if they were positive, or not, a few became positive after. Also worked with a family who traveled here from Sicily because her young son was found dead, had to stop them from going to funeral home, had to call Beauport Ambulance to get PCR test, and also translate. Unfortunately the Sicilian Language has its own dialect is the Italian translation is different and not understandable to Sicilian Seniors where their dialect even unreadable. I said I would give my spot to someone who needs it I'm pretty healthy,

[REDACTED]. So I said I'm needed to my seniors healthy and I believe my volunteering for Addison Gilbert Hospital where they use my hours of SHINE for their in kind hours to meet State Criteria, but they did not ask me to do any in home service, unfortunately the Federal Government did when they didn't delay the Open Enrollment for Medicare Rx. For that reason I had to see patients in their home or yes my office, at no risk to staff. Not all seniors have access to computers, or WiFi and some can't understand over the phone, hearing problems, our most vulnerable, low income non speaking Seniors needed to be present. So with this explanation I will keep my appointment and sign the statement. How one person gets vaccinated because he cleaned a room of a COVID patient or others being in the area of the clinic qualifies, but what I do not as Mayor (which all Mayors should also have been vaccinated already I know that myself is approachable all the time even when I'm at AGH I get stopped and there is no 6ft, I have to remind people in grocery stores, and my office now has to be locked even though we have security they said they are go She has said, at times, ing to pay a bill and then after they pay there Bill go across to my office frequently, that we now lock my door when Enza goes to other departments and ladies room.

Thank you
Sefatia

Brody, Hardoon, Perkins & Kesten, LLP

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April 30, 2021

Via Email

Meredith A. Fine, Esq.
46 Middle Street
Gloucester, MA 01930

Dear Attorney Fine:

I write on behalf of Mayor Romeo Theken and in response to your letter of April 22, 2021.

Needless to say, we do not agree with all of the accusations of misconduct by the Mayor alleged by you and your client in your communication. Having said that, the Mayor's efforts towards those affected by the pandemic are sincere and a testament to her commitment to the City. She continues to be fully invested in the welfare of the residents of Gloucester.

The Mayor joins the Board of Health in expressing her gratitude for the tireless work of the entire Health Department in responding to this pandemic and she will continue to support and cooperate with the Department's efforts to mitigate the crisis.

We have reviewed your points and respond as follows:

1. The Mayor will not set up any vaccine appointments.
2. The Mayor will not conduct any contact tracing.
3. The Mayor will refer all vaccine and testing related questions to the Health Department.
4. The Mayor will not denigrate any Health Department employees or the Department to anyone.

5. The Mayor recognizes the chain of command at the Health Department and will, to the greatest extent possible, follow the chain of command by contacting the director and assistant director initially.
6. The Mayor certifies that she understands and respects the boundaries of the Health Department.

As you mention in a previous email, your goal and sole focus was to solve the problem and I trust that our responses have satisfied the concerns that Ms. Carroll has expressed through your letter. The Mayor looks forward to continuing to work with the Board of Health to protect the residents of Gloucester.

Very truly yours,

BRODY, HARDOON, PERKINS & KESTEN, LLP

A handwritten signature in black ink, appearing to read 'L.H. Kesten', written in a cursive style.

Leonard H. Kesten

LHK:id

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May 3, 2021

Leonard H. Kesten, Esq.
Brody, Hardoon, Perkins & Kesten, LLP
699 Boylston Street 12th floor
Boston, MA 02116

Re: Karin Carroll complaint

By electronic mail

Dear Attorney Kesten:

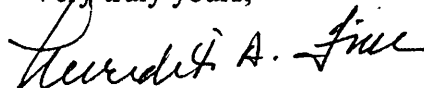
I continue to represent Karin Carroll, M.P.H., public health director of the City of Gloucester. I am responding to your April 30, 2021, letter.

Ms. Carroll appreciates Mayor Theken's ongoing commitment to protecting the health of Gloucester citizen and also appreciates Mayor Theken's willingness to accede to Ms. Carroll's requests in my April 22, 2021, letter.

In responding to point 5, the mayor says she will follow the Health Department chain of command "to the greatest extent possible." Ms. Carroll rejects this language. The Health Department does not report to the mayor. Furthermore, Ms. Carroll cannot envision a circumstance where the mayor would need to contact a Health Department employee directly without the knowledge of the director or assistant director. Ms. Carroll cannot perform her job properly if the mayor schedules meetings with Health Department employees; texts or calls Health Department employees, both during and outside work; or otherwise directs the work of Health Department employees.

Please remove that language from your April 30, 2021, letter.

Very truly yours,



Meredith A. Fine

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May 4, 2021

Via Email

Meredith A. Fine, Esq.
46 Middle Street
Gloucester, MA 01930

Dear Attorney Fine:

I write on behalf of Mayor Romeo Theken and in response to your letters of April 22 and May 3, 2021.

Needless to say, we do not agree with all of the accusations of misconduct by the Mayor alleged by you and your client in your communication. Having said that, the Mayor's efforts towards those affected by the pandemic are sincere and a testament to her commitment to the City. She continues to be fully invested in the welfare of the residents of Gloucester.

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anyone.

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Very truly yours,

BRODY, HARDOON, PERKINS & KESTEN, LLP

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Leonard H. Kesten

LHK:id