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September 16, 2020

Mr. John Tabor, Chairman
CITY OF PORTSMOUTH
Ethics Committee

SENT VIA EMAIL ONLY
johntaborportsmouth@gmail.com

RE: Complaint Against Esther Kennedy

Dear Chairman Tabor:

Please be advised that Mrs. Kathleen Cavalaro has consulted with me this afternoon with regard to the pending Ethics Committee Meeting being held this evening on the complaint filed against Counselor Esther Kennedy and specifically with regard to a so-called "Time Line" Counselor Kennedy's attorney, Duncan MacCallum, filed with the Committee this date.

The "Time Line" filed by Counselor Kennedy unfortunately contains numerous inaccuracies with regard to my client, not to mention that the so-called "Time Line" is neither verified nor signed by Counselor Kennedy as true and accurate statements by her. It is my opinion that some of the statements made by Counselor Kennedy concerning my client are simply not true. Additionally, neither myself nor Mrs. Cavalaro can be available to attend this evenings meeting so has to be given the right to appear and give evidence that will disprove the inaccurate statements made concerning Mrs. Cavalaro.

In this regard, Mrs. Cavalaro and I request that the Committee continue this evenings' meeting so that we have time to prepare, attend and defend against the wrongful and false statements Counselor Kennedy has made against Ms. Cavalaro in her filing this date, or in the alternative, either not allow Counselor Kennedy's "Time Line" to be allowed as part of the record this evening or strike all references to Mrs. Calavaro in the "Time Line" if the Committee accepts the filing.

Thank you for your consideration.

Very truly yours,


Jay Nadeau

JPN/gcn

Cc: Mrs. Kathleen Cavalaro

Robert Sullivan, Esq. (via email only – rsullivan@cityofportsmouth.com)