

September 20, 2024

Via Hand Delivery

Board of Selectman, Town of Bethany
Bethany Town Hall
40 Peck Road
Bethany, CT 06524

Re: Proposal in Response to Letter of Interest from Town of Bethany

Dear Board of Selectman:

Thank you for requesting a proposal from Spears Manning & Martini to perform an independent investigation of matters related to the Town of Bethany's ("Town") Park & Recreation After School Program. The project described in the Town's Letter of Interest is squarely within our core practice area. We believe that we can address the questions presented fairly and thoroughly and appreciate your consideration of our proposal.

Background & Firm Experience

I have practiced in the area of investigations and criminal law since 1994. I served as a federal prosecutor in the District of Connecticut for six years during which time I was the lead prosecutor on several cases involving sexual abuse and crimes against children. Since serving as a federal prosecutor, I have continued to handle a variety of investigations, including two investigations of the United Nations, a sexual abuse investigation for St. Vincent's Medical Center, dozens of internal investigations for Purdue Pharma regarding opioid prescriptions, and a recent corruption investigation for a publicly traded company. In addition to the sexual abuse investigation that I conducted for St. Vincent's Medical Center, I have represented several individual clients who were the victims of sexual assault and assisted them in navigating through the criminal justice system and the civil litigation process.

Our firm has substantial additional experience and resources relevant to this matter. Joe Martini, who is a partner in our firm, has extensive investigative experience. Since his service as a federal prosecutor here in Connecticut, Joe has handled investigations on behalf of numerous organizations and universities, including Yale New Haven Health, Quinnipiac University, University of New Haven, and University of Hartford. Others in our firm, including our partner Leslie Cahill and each of our associates, have extensive experience handling internal investigations, including interviewing witnesses, reviewing emails, texts, and key documents, and preparing reports.

Our firm is a Band One Chambers-rated law firm in Connecticut in the area of white-collar crime and government investigations. Joe and I are also Chambers-ranked individually.

We have received many additional recognitions over the last ten years, including from Best Lawyers and Super Lawyers.

Project Understanding & Approach

Many investigations involve determining who knew about the important events, when they learned of them, and how they reacted. For an investigation of this nature, the first step is to ensure that the universe of relevant records has been secured. From there, it is critical to develop a detailed understanding of the chronology of events and identify key witnesses. This is often best achieved by assembling and reviewing key emails, texts, and calendar entries. Witness interviews need to be carefully choreographed and handled in a manner that does not touch off unnecessary alarm. Witness cooperation is critical, and we pride ourselves on developing witnesses in a manner that maximizes the amount of truthful information we can gather. Very often having a command of the key documents in advance of witness interviews will further that objective.

One of the primary goals in an investigation of this nature is to deliver a report that is independent, credible and thorough, always keeping in sight the key questions that we have been asked to address. The credibility of our findings is ultimately paramount and will help the Town learn from the experience and move beyond it. Having a responsive and neutral liaison from the Town is necessary as well. This will enable good communication lines, for example, with Selectmen Robert Brinton and Gina Teixeira, which the Town has flagged as a priority.

Staff Plan and Qualifications

With respect to staffing, I will serve as the lead attorney for this matter. I further propose including Leslie Cahill (partner) and Janna Eastwood (associate) on the engagement. Leslie and Janna each have experience with investigations, document review, and witness interviews. Leslie and Janna's combined experience includes dozens of internal investigations. Including them on the team will quicken the pace of document review and report writing. I also propose having Joe Martini available to consult on big picture strategy and direction. Joe is highly experienced in investigative matters as noted above.

Fee Proposal

My hourly rate (and Joe's) is \$650. Leslie and Janna's rates are \$500 and \$425 per hour, respectively. Depending on the volume of documents, it may be necessary to hire a vendor to host a searchable database. (We have worked with several qualified cost-efficient vendors for this purpose.)

Schedule

We are prepared to begin working on the engagement immediately. We anticipate performing the bulk of the work within two to three months. We can accelerate the timeline as

needed provided that we have access to the information and witnesses necessary to complete our work.

References

Please feel free to contact the following references in regards to our experience conducting investigations.

1. *Peter Struzzi* worked with our firm while serving as general counsel for St. Vincent's Medical Center in connection with allegations of abuse by a nurse. His contact information is as follows:

Robinson & Cole
One State Street
Hartford, CT, 06103
(860) 275-8306
pstruzzi@rc.com

2. *Ron Stovash* engaged our firm in connection with an investigation regarding alleged foreign corruption. His contact information is as follows:

Corsa Coal Corp.
1576 Stoystown Road, PO Box 260
Friedens, PA 15541
(304) 280-1685
rgstovash@comcast.net

3. *Maria Barton* worked with our firm in her capacity as former in-house counsel for Purdue Pharma, for whom our firm conducted over 100 internal investigations. Her contact information is as follows:

(914) 325-5759

4. *Danielle Gentin-Stock* worked with our firm in her capacity as former in-house counsel for Purdue Pharma, for whom our firm conducted over 100 internal investigations. Her contact information is as follows:

Dechert
Three Bryant Park, 1095 Avenue of the Americas
New York, NY 10036-6797
(212) 698 3565

danielle.gentinstock@dechert.com

5. *Jean Husted* engaged our firm on behalf of the University of New Haven to conduct an independent investigation of allegations of sexual harassment involving a former employee. Her contact information is as follows:

Avangrid Networks
180 Marsh Hill Road
Orange, CT 06477
jhusted@avengrid.com

Thank you again for considering Spears Manning & Martini for the referenced assignment. Please let me know if you have any further questions or require further information.

Very truly yours,



Brian E. Spears

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