

MARIA A. LUISE, ESQ.
1410 EASTERN AVENUE
MALDEN, MASSACHUSETTS 02148
781 640-1320

April 30, 2025

Mr. Bruce Friedman
8 Marvin Street
Malden, MA 02148

RE: Bruce Friedman, *et al.* v. Malden Community Fund Committee, Inc., *et al.*
CIVIL ACTION NO: 2581-CV-00740

Dear Mr. Friedman,

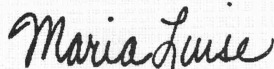
I am enclosing a flash drive containing a variety of documents as well as a table I created that lists each request with a response.

Back in July of 2024, we provided you documents in response to a public records requests despite the continued good faith belief that the Malden Community Fund, Inc. (MCFI) was not a public body for the purposes of public records. We did so because there is simply nothing to hide and in doing so, we hoped it would put to rest the ongoing inaccurate speculation about misuse of funds, missing funds, etc.

On this flash drive, we are providing you with additional documents that either didn't exist at the time of your earlier request or were not part of the request. We are doing so despite the fact that the Attorney General has provided verification of our good faith belief that MCFI is not a public body. We've also gone above and beyond to actually create records that provide confirmation, along with bank statements and other documents, that every single dollar that was received for the community fund is accounted for, that not a single dollar went to salaries, benefits, campaign expenses, or anything other than funding three requests and some filing fees. Simply put, the representation that there should be \$800k to \$1m is wrong and doesn't comport with any agreement.

We are confident that the court will recognize that these steps are extraordinary, beyond what was required under the law. More importantly, there simply are no more documents, no more explanations, no more information that can be made available to address the questions brought up, public body or not. At this point, the funds shown in the reconciliation are in the hands of the City as a Special Revenue Fund and we hope we can clear this matter up and make an announcement on how the public can access them. Thank you for your attention.

Sincerely,



MARIA A. LUISE

TABLE OF RESPONSES

Folder	Request	Notes
A, B and C	All documents showing all monies received by the City of Malden derived from the surrounding community agreement that are to be used for the Malden Community Fund as outlined in the surrounding community agreement as the "Malden Community Fund" 6. Through 6.2.b. – (This amount should be between \$800,000 and \$1M to date and can be provided through copies of the checks received from the Encore and the deposits and institutions where they were deposited).	Although it is not required to create documents that don't exist, we are providing a summary of Community Fund Payments and Expenses, Bank Account Breakdown and screenshot of the current balance with the Controller's Office (Folder A). Also providing copies of the deposits received (Folder B) and all bank statements (Folder C). The institutions were Century Bank and Eastern Bank.
A, B, C and D	An accounting of every dollar received above including any movements, transfers, withdrawals, deposits of these funds from the date of receipt to where every dollar exists today that is under control of the City, the Committee or any other entity which is entitled to hold these public dollars.	Although it is not required to create documents that don't exist, we are providing a summary of Community Fund Payments and Expenses, Bank Account Breakdown and screenshot of the current balance with the Controller's Office (Folder A). Also providing copies of the deposits received (Folder B), all bank statements (Folder C) and copies of checks written (Folder D).
E	All applications sent out by the City or the Community Fund.	Attached.
E	All applications received for funding provided by the monies received under the surrounding community agreement 6.-6.2.b.	Attached.
E	Any criteria used to determine eligibility and decisions of funding by the fund.	Attached.
-	All audits and/or audited financial statements.	No responsive documents.
E	All communications with applicants for funding.	Attached.
F	All communications of inquiries for funding.	See attached. Any inquiries would be in the emails provided.
F	All communications between officers, directors and city of Malden officials, including the Mayor regarding the fund.	Attached.
G	All filings made with the Commonwealth of Massachusetts – none of these have been provided to date.	These are all publicly available but also attached.
H	All IRS (Internal Revenue Service) filings, including 501c3 filings – None of these have been provided to date, only preparations, not signed filings.	Attached.
-	All meeting notices – None of these have been provided.	No responsive documents.
I	All meeting minutes – We were provided meeting minutes for 9/19/23 and 9/17/19 only. We have a copy of December 2024 minutes, but only as a screenshot.	Attached.
-	Any EIN assigned by the Commonwealth of Massachusetts.	No responsive documents.
C	A copy of all banking statements – We have from 12-3-2019 through May 31, 2024, and would like the remainder.	Attached.

TABLE OF RESPONSES

Folder	Request	Notes
-	A copy of the financial ledger maintained for the Corporation.	No responsive documents.
A and C	A copy of any expenditures made by the Corporation.	Although it is not required to create documents that don't exist, we are providing a summary of Community Fund Payments and Expenses, and Bank Account Breakdown. (Folder A) . Also providing all bank statements (Folder C) .
B and C	A copy of all income to the Corporation, specifically all checks received, the dates they were received and from who.	See copies of the deposits received (Folder B) and all bank statements (Folder C) .
-	A copy of all donations made to the Corporation, if any exist.	No responsive documents.
J	A copy of all financial statements for the Corporation.	Attached.
-	A roster of any stockholders, if any exist.	No responsive documents.
-	A roster of any donors, if any exist.	No responsive documents.
K	The process for electing directors and officers.	The only responsive documents are the corporate by-laws.
K	Meeting procedures.	The only responsive documents are the corporate by-laws.
K	Voting rights and procedures.	The only responsive documents are the corporate by-laws.
-	A copy of all payments made to any person for any purpose, including but not limited to salary, benefits, bonuses, expenses, reimbursements.	No responsive documents.