

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT

ESSEX, ss

SUPERIOR COURT
CIVIL DIVISION
No. 08-1931-D

WILLIAM H. DIADAMO,)
Plaintiff,)
v.)
THOMAS J. DUGGAN, JR,)
VALLEY PATRIOT, Inc.,)
MERRIMACK VALLEY RADIO, LLC,)
JOHN DOE ONE, and)
JOHN DOE TWO,)
Defendants.)

THOMAS J. DUGGAN, JR.
SPECIAL MOTION TO DISMISS
G.L. c. 231 §59H

NOW COMES the Defendant, Thomas J. Duggan, Jr., and moves that the plaintiff's Complaint in the above matter be dismissed pursuant to G.L. c. 231, §59H (the "anti-SLAPP" Statute).

INTRODUCTION

This case involves a defamation lawsuit against Thomas J. Duggan, Jr. a radio commentator on the weekly show "Paying Attention" broadcast on 980 WCAP, an AM Radio Station. The dispute arose over the August 24, 2008 program of "Paying Attention" when Mr. Duggan criticized the plaintiff, William H. DiAdamo, representation as the lawyer for the City of Lawrence during the Andrea Traficanti workers' compensation case and the plaintiff's connection to Ms. Traficanti's husband.

Plaintiff, William H. DiAdamo, was the attorney for the City of Lawrence, Massachusetts in a Workers' Compensation case involving Andrea Traficanti ("Traficanti") who claimed she was disabled because of stress she endured at Lawrence City Hall. Since his representation of this case Mr. DiAdamo has been fired by the City of Lawrence from representing it on any further workers' compensation matters. The defendant, Thomas J. Duggan, Jr. ("Duggan"), made statements during a call-in radio program, "Paying Attention," which questioned Atty. DiAdamo's representation of the City in the Traficanti case. Mr. Duggan told the community that he has learned that Mr. DiAdamo was fired "because he is being accused of throwing the case (Andrea Traficanti)." Mr. Duggan also stated sources of income from City and governmental agencies that the DiAdamo Law Offices or attorneys in that office receive.

Mr. Duggan was exercising his personal right to petition for a review of the specific decision by the Department of Industrial Accidents because of actions or inaction of Atty. DiAdamo in the settlement of a City claim using public funds by disclosing to the community factual reports.

Atty. DiAdamo's sole basis in his defamation action is to stop this petitioning to review the Department's decision.

ARGUMENT

SLAPP stands for "Strategic Lawsuit Against Public Participation" and typically refers to a lawsuit filed in retaliation against an individual or organization that speaks out on a public issue or controversy. Most SLAPPs would fail if fully litigated, but the party that files a SLAPP suit usually does not intend to take it through to a judgment. The point

of a SLAPP is to intimidate and silence the target through the threat of an expensive lawsuit. As the General Court noted in enacting the Massachusetts anti-SLAPP statute, "there [had] been a disturbing increase in lawsuits brought primarily to chill the valid exercise of the constitutional rights of freedom of speech and petition for the redress of grievances." See preamble to 1994 House Doc. No. 1520.

To guard against the chilling effect of SLAPPs, twenty-six states and one U.S. territory have enacted anti-SLAPP statutes. In many of these states (including Massachusetts), these laws allow a defendant facing a SLAPP suit to file a special motion to dismiss, receive an expedited review of that motion and a stay of discovery until the motion is decided, and recover attorneys' fees if the motion is successful. See G.L. c.231, §59H. These protections are essential.

DEFAMATION ACTIONS ARE COVERED UNDER G.L. c. 231, §59H

The Massachusetts SJC has ruled that G.L. c. 231, §59H, applies to defamation actions ("defamation most popular SLAPP cause of action"). *Baker v. Parsons*, 434 Mass. 543, 551 (2001), *MacDonald v. Paton*, 57 Mass.App.Ct. 290 (2003).

The Court has stated: "(a)s a public policy matter, it is axiomatic that by exercising one's rights to petition under G.L.c.231 §59H, defamation claims may arise simply because of the nature of the petitioning activity itself." *Cormier v. MacDow*, Mass. Sup., August 15, 2007.

**THE CLAIMS OF THE PLAINTIFF
ARE BASED ON THE PETIONING ACTIVITY
OF THE DEFENDANT, THOMAS J. DUGGAN, JR.**

The Massachusetts anti-SLAPP law does not limit the type of party that may bring a special motion to dismiss. Rather, the statute's protections extend to "any case in which a party asserts that the civil claims, counterclaims, or cross claims against said party are based on said party's exercise of its right of petition." Mass. Gen. Laws c. 231, §59H. In enacting the statute, "the Legislature intended to enact very broad protection for petitioning activities," *Duracraft Corp. v. Holmes Products Corp.*, 427 Mass.156,162 (1998), and the statute enumerates five types of activities that fall within its scope, including any written or oral statement (1) "made before or submitted to a legislative, executive, or judicial body, or any other governmental proceeding"; (2) "made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other governmental proceeding"; (3) "reasonably likely to encourage consideration or review of an issue by a legislative, executive, or judicial body or any other governmental proceeding"; (4) "reasonably likely to enlist public participation in an effort to effect such consideration"; or (5) "any other statement falling within constitutional protection of the right to petition government." G.L.c. 231, §59H.

One court in the Commonwealth has already ruled that a newspaper article "falls squarely with(in) the protection of (the anti-SLAPP law) as a '... written or oral statement made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other governmental proceeding.'" *Salvo v. Ottoway Newspapers*, No. 97-2123-C, 1998 WL 34060940, at *2 (Mass. Super. May 13,

1998). The forum of the published statements complained of by DiAdamo is a radio broadcast not unlike the print publication in terms of legal analysis.

The present case captures 4 of the above activities: (2), (3), (4), and (5). Specifically, (2) Andrea Traficanti is now back in court next month seeking permanent and total disability benefits, claiming she cannot work anymore because of the stress endured at Lawrence City Hall, therefore Mr. Duggan's radio petition to the community is viable to affect the outcome of this claim to a governmental agency, the Department of Industrial Accidents. Under (3), Mr. Duggan's comments on the radio are "reasonably likely to encourage consideration or review of an issue by another governmental proceeding" here the DIA. Mr. Duggan is petitioning to review a decision he personally believes was incorrectly reached based upon the facts he has uncovered. See Affidavit of Thomas J. Duggan, Jr. Exhibit A.

Under criteria (4) above, Mr. Duggan's radio comments are "reasonably likely to enlist public participation in an effort to effect such consideration" of the pending hearing scheduled for December 10, 2008 before the Department of Industrial Accidents by Andrea Traficanti. Mr. Duggan's intent was to personally bring to the attention to his radio listeners a call to action to enlist the public's support to review the specific decision in this workers' compensation case. Mr. Duggan was attempting to bring about change through his own personal petitioning on the radio. See Affidavit of Thomas J. Duggan, Jr., Exhibit A.

In addition to informing and influencing the government directly through his own statements, Mr. Duggan provided a forum for others' speech by allowing members of the

community to comment on issues and thereby "enlist public participation in an effort to effect" consideration by the government. G.L.c. 231, §59H. In a case involving the publisher of a Web site, the Appeals Court found that providing a public forum of this type constitutes petitioning activity under the anti-SLAPP law. In *MacDonald v. Paton*, the defendant operated a website that functioned as "an interactive public forum on issues relating to . . . town governance, including education funding and municipal use of tax dollars." 57 Mass. App. Ct. 290, at 294. The court determined that the defendant's operation of the site, which served as "a technological version of a meeting of citizens on the Town Green, a space where concerned individuals could come together to share information, express political opinions, and rally on town issues of concern to the community" - constituted defendant's own "petitioning activities" within the meaning of the anti-SLAPP law. *Id.* at 295 (emphasis added). Much like Mr. Duggan's call-in radio program "Paying Attention."

The threshold test of whether Mr. Duggan has engaged in petitioning activity under the anti-SLAPP statute is clear.

**THE ACTIVITY OF THE PETIONING PARTY
WAS BASED ON REASONABLE FACTUAL SUPPORT**

The factual background facts that led up to the comments made by Mr. Duggan have been outlined in his Affidavit, that of Paula Porten, and the affidavit of Michael Sweeney. It should also be noted that statements were made, as a source, from the plaintiff himself.

A. Referencing the following statements:

"I've got information now from the City of Lawrence from a number of other sources in the City of Lawrence that attorney DiAdamo who was representing the City of Lawrence during the Andrea Traficanti disability case is being accused of throwing the case and has been fired by the City of Lawrence because he is being accused of throwing the case."

and

"...that he (DiAdamo) is best friends with Ms. McCann's husband and that Ms. McCann's husband was in his office discussing the case on numerous occasions prior to him representing the City on this case." (Note: Ms. McCann is Andrea Traficanti).

1. Carmine DiAdamo in a letter to Mr. Duggan dated August 26, 2008, stated that "We are frequently retained for our ability to communicate with the other side, which ironically, is apparently the reason *we were fired here.*" Emphasis supplied.
2. William H. DiAdamo told Paula Porten that he was not prepared to defend the City of Lawrence in the Andrea Traficanti workers' compensation case. See Affidavit of Paula Porten. Exhibit B.
3. William H. DiAdamo told Paula Porten that he wanted to settle the Andrea Traficanti case See Porten Affidavit. Exhibit B.
4. Paula Porten offered William H. DiAdamo several photographs showing Andrea Traficanti dancing and drinking at a political function at the French Social Club with City Hall employees at the time she was claiming stress disability working in City Hall. Atty. DiAdamo refused to take the photographs. See Porten Affidavit.
5. William H. DiAdamo went to City Hall in Lawrence unannounced on or before the day of the Andrea Traficanti workers' compensation

hearing and told the City of Lawrence Director of Planning, Michael Sweeney that "I am unprepared." "I don't know what I am going to do tomorrow." See Michael Sweeney Affidavit. Exhibit C.

6. Michael Sweeney offered to testify at the Traficanti hearing the day after William H. DiAdamo came to his office. Mr. Sweeney never received a call to testify. Mr. Sweeney gave William H. DiAdamo the names of current and former City Hall who would testify and give evidence at the Traficanti hearing. It is believed that Atty. DiAdamo never contacted them. See Sweeney Affidavit. Exhibit C.
7. At the meeting at City Hall on or before the day of the Traficanti hearing, William H. DiAdamo with Mr. Sweeney present said that Frank McCann was always in his law office talking about the Andrea Traficanti case. He said that he was uncomfortable handling this case. See Sweeney Affidavit.
8. At the City Hall meeting before or on the day of the Traficanti hearing, William H. DiAdamo said that he had a conflict with the case because of Frank McCann's contact with his law office. See Sweeney Affidavit.
9. Frank McCann is on the Greater Lawrence Sanitary District board. The DiAdamo Law Office represents the Board. Frank McCann votes to approve legal bills. See Duggan Affidavit. Exhibit A.

B. In reference to the statement that:

"I get some information that Attorney DiAdamo is making 100k a year as special counsel of the Greater Lawrence Sanitary District."

1. While the DiAdamo Law Office was representing the City of Lawrence against Traficanti's workers' compensation claim, they continued to serve as special counsel for the GLSD. The GLSD paid DiAdamo \$47,731 in 2007 and \$108,733 in 2006 for legal services.

See Duggan Affidavit and Exhibit D.

2. DiAdamo Law Offices has not filed a conflict of interest document (a Chapter 268A Filing) with the GLSD.

C. In reference to the statement that:

"The City of Lawrence was paying him somewhere in the neighborhood of \$70 to \$75,000 dollars He's making \$175,000 plus dollars a year with these two contracts alone."

1. According to the DiAdamo Law Office with respect to workers' compensation claims "we were engaged under a contract that paid \$48,000 a year.

2. The School Department administrative offices are in the same building as the DiAdamo Law Offices, behind City Hall. The lease for this space to the City pays to Carmine DiAdamo/owner or Carmine DiAdamo/trustee \$344,300.28 per year. From July 2001 to the present the total from the City of Lawrence as rent payments is \$2,616,362.40.

See Duggan Affidavit and Exhibit E.

D. In reference to the statement:

"And it's going to be interesting to see if there is going to be a BBO complaint. My understanding is that it's something being bantered about and is very possible."

Assistant City Attorney Richard D'Agostino told Mr.Duggan that any attorney hired by the City who is involved in sharing privileged information, whether working for the City or in private practice, violates his client's confidentiality, that this would be an issue for the Board of Bar Overseers.

See Duggan Affidavit. Exhibit A.

Therefore, there is an overwhelming amount of reasonable factual support to form a basis for the petitioning activity statements made by Mr. Duggan.

BURDEN OF PROOF

Special motions to dismiss pursuant to the anti-SLAPP provisions of G.L. c. 231, §59H are governed by a two part test that is well established by Massachusetts courts. In the first step, the moving party, Thomas J. Duggan, Jr., must show that the claims against him are based on petitioning activity alone and have no substantial basis other than petitioning activities. Once this threshold step is satisfied, then the burden shifts to the nonmoving party, Mr. DiAdamo. *MacDonald v. Paton, supra.*

CONCLUSION AND REQUEST FOR ATTORNEY'S FEES

Because the plaintiff's Complaint is based on defendant's, Thomas J. Duggan, Jr., right to petition, and because said plaintiff cannot sustain his burden of establishing that this Special Motion To Dismiss is "devoid of any reasonable factual support or any arguable basis in law," said Complaint must be dismissed pursuant to G.L. c.231, §59H, and the moving party be awarded costs and reasonable attorney's fees, including those incurred for the special motion, all pursuant to the statute.

Respectfully submitted,
Thomas J. Duggan, Jr.
By his attorney,

November 24, 2008



Peter J. Caruso, BBO# 076920
One Elm Square
Andover, MA 01810
(978)475-2200

CERTIFICATE OF SERVICE

I, Peter J. Caruso, attorney for the Thomas J. Duggan, Jr., hereby certify that on the November 24, 2008, a copy of the forgoing Special Motion To Dismiss was served by delivery by hand to the offices of Carmine W. DiAdamo, Esq., DiAdamo Law Office, LLP, 40 Appleton Way, Lawrence, MA 01840.



Peter J. Caruso

EXHIBIT A

Accident Board (IAB) because of the conduct and conflict of the lawyer representing the City of Lawrence. I was trying to get the decision in the Traficanti case reviewed.

5. My facts supported that the plaintiff, William H. DiAdamo, as the lawyer representing the City of Lawrence, was not prepared to argue the City's case against Traficanti, had a possible conflict of interest, and refused assistance and evidence to support the City's position before the Industrial Accident Board (IAB).
6. I believe the IAB and the City of Lawrence ought to review the decision of the IAB in the Andrea Traficanti case based on my fact gathering.
7. My statements on the radio program were intended to enlist public participation, to create an outcry about a specific case, and for me, as a citizen, to bring light on a decision by a governmental agency (IAB) which should not have been settled. The Andrea Traficanti case must be re-opened.
8. My facts revealed that the plaintiff in this case against me personally, William H. DiAdamo, went to City Hall officials, unannounced on or before the day of the workers' compensation hearing for Andrea Traficanti and told them that he was not prepared to argue the case for the City.
9. The City Official volunteered to testify and to offer damaging evidence against Andrea Traficanti which would support the City's case. The City Official volunteered to be available the entire day of the hearing. The City Official told me he waited all day, but never received any call from William H. DiAdamo to testify, or any request for written testimony.
10. A City Official told me that he offered the names of several other people who would testify in favor of the City. None of these individuals were contacted by Atty. DiAdamo.

11. A City Official told me that William H. DiAdamo told him that the case should be settled. The City Official told me that the City did not want to settle.
12. A City Official told me that when he asked William H. DiAdamo why no subpoenas for witnesses were issued, and why he was unprepared, William H. DiAdamo responded that his office was friendly with Frank McCann, Andrea's husband.
13. In my fact gathering investigation, I found that Carmine DiAdamo, a founding member of the DiAdamo Law Office, represented the Greater Lawrence Sanitary District (GLSD) on which Frank McCann is a Commissioner and votes on approving legal bills, such as from the DiAdamo firm.
14. While the DiAdamo Law Office was representing the City of Lawrence against Traficanti's workers' compensation claim, they continued to serve as special counsel for the GLSD. The GLSD paid DiAdamo \$47,731 in 2007 and \$108,733 in 2006 for legal services. The GLSD has written that no conflict of interest documents were submitted to GSLD by DiAdamo. DiAdamo admitted this in his Answer to the Complaint. Exhibit A.
15. Carmine DiAdamo, the founding member of the law office, through a Trust which owns the building behind City Hall and rents space to the school department administrative offices was paid both as owner and trustee payments totaling \$2,616,362.40 from July 2001 to the present. See attached Exhibit B.
16. In my factual investigation I learned that Paula Porten has offered photographs showing Andrea Traficanti at a political fundraiser dancing and drinking with City Hall employees; and, that she offered these photographs to William H. DiAdamo to be used as evidence at the IAB hearing to show that Ms. Traficanti-McCann was not disabled and not "stressed from the antics of city hall." I learned that William H. DiAdamo refused the photographs.

17. I also learned from my factual investigation before the radio program, that William H. DiAdamo was fired by the City of Lawrence from any further Workers' Compensation cases.
18. I also learned from Paula Porten that William H. DiAdamo met with Michael Sweeney the Dir. Of Planning, and Thomas Schiavone of the Mayor's office prior to the IAB hearing. At this meeting Atty. DiAdamo asked to just settle the case; but was not given authority to settle. The City wanted him to argue in their favor.
19. I spoke with the Assistant City Attorney, Richard D'Agostino, who told me that any attorney hired by the City who is involved in sharing privileged information, whether working for the City or in private practice, violates his client's confidentiality, that this would be an issue for the Board of Bar Overseers.
20. I have been told by Paula Porten that several articles in *The Valley Patriot* which have been attributed to confidential sources were in fact obtained from the plaintiff, William H. DiAdamo, while representing the City. William H. DiAdamo was a source in the Andrea Traficanti case (ironically which is this case) and the Jennifer Padellaro case.
21. I have received several e-mails from both Carmine DiAdamo and William H. DiAdamo prior to this lawsuit being filed. On September 24, 2008, I received an e-mail from the plaintiff which was in his terms giving me "prior notice" of a proposed lawsuit. Basically, in my mind, trying to shut me up and cease my investigation. I took this to be a threat, he's a skilled litigator while I do not have the resources to fight a legal battle, that I should stop my outcry. Further, the legal letter said I should give the plaintiff and his father notices of any more statements I intend to make before I make them. See attached e-mail as Exhibit C.

22. I replied that I would continue my petition to expose issues for a review of the Andrea Traficanti case by the IAB and the City by stating that I would give the plaintiff and his father, Atty. Carmine DiAdamo, the opportunity to respond either on the radio or in the newspaper about their City work. However, I would continue my fact finding that I began. See Exhibit D.
23. There is now scheduled a hearing before the Department of Industrial Accidents on whether Andrea Traficanti can claim that she is permanently and totally disabled indefinitely and can not work anymore because of the stress she endured at Lawrence City Hall. A conciliation is scheduled for December 10, 2008.
24. I do not get paid any money for my radio show. The radio airs sixty second spots at various times supporting *The Valley Patriot* newspaper.
25. My fact gathering into the Andrea Traficanti matter led me to state on the air during the radio broadcast that I personally, and not as part of the radio station or anyone else, was bringing to the attention of my community listeners a call to action to enlist the public's support to review the specific decision by the AIB, as a government agency, regarding the case of Andrea Traficanti against the City of Lawrence.
26. The radio program "Paying Attention" allows, and encourages call-ins from the community to enable an interactive exchange of community issues.

Signed under the pains and penalties of perjury this November 24, 2008.

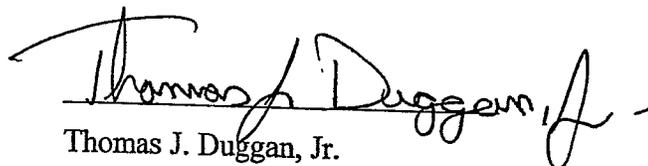

Thomas J. Duggan, Jr.

EXHIBIT A

GREATER LAWRENCE SANITARY DISTRICT

CHECK HISTORY REPORT

SORTED BY CHECK NUMBER

ACTIVITY FROM: 01/01/01 TO: 10/15/08

BANK CODE: A BANK OF AMERICA-GENERAL FUND

CHECK NUMBER	CHECK DATE	VENDOR NUMBER	NAME	CHECK AMOUNT
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00- (REVRSL)
021208	03/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00
021668	07/31/01	00 - DIADAM	CARMINE W DIADAMO ESQ	20,887.50
021986	10/24/01	00 - DIADAM	CARMINE W DIADAMO ESQ	9,971.43
022890	06/26/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,300.00
023159	08/28/02	00 - DIADAM	CARMINE W DIADAMO ESQ	13,110.40
023404	10/30/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,402.40
025767	07/28/04	00 - DIADAM	CARMINE W DIADAMO ESQ	37,828.22
025910	09/29/04	00 - DIADAM	CARMINE W DIADAMO ESQ	500.00
026487	02/18/05	00 - DIADAM	CARMINE W DIADAMO ESQ	18,240.00
027563	12/15/05	00 - DIADAM	CARMINE W DIADAMO ESQ	12,208.00
028047	05/26/06	00 - DIADAM	CARMINE W DIADAMO ESQ	43,119.00
028254	07/21/06	00 - DIADAM	CARMINE W DIADAMO ESQ	340.00

BANK A TOTAL: 219,281.95

REPORT TOTAL: 219,281.95

EXHIBIT B

10/06/2008 09:12
l000mgil

CITY OF LAWRENCE
CHECKS BROWSE

PG 1
apvdrmnt

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01 1040	91385	10/26/2004	28s-05	V		.00
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01 1040	71072	03/28/2003	154s-03			14,819.84
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01 1040	66765	12/09/2002	101s-03			14,819.84
01 1040	65231	11/01/2002	83s-03			14,819.84
01 1040	64095	09/23/2002	47SB03			14,819.84
01 1040	63407	08/30/2002	30s-03			44,459.52
01 1040	60137	05/21/2002	198s-02			14,819.84
01 1040	58977	04/26/2002	179s-02			14,819.84
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01 1040	56839	03/07/2002	160s-02			14,819.84
01 1040	55309	01/29/2002	124SD-02			14,819.84
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01 1040	52346	11/19/2001	87s-02			14,819.84
01 1040	50269	09/19/2001	52s-02			59,279.36

Vendor 21784 DIADAMO CARMINE W has 33 Checks for: 856,408.20

** END OF REPORT - Generated by Maria Gilbert **

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01 1040	136269	05/06/2008	109S-08		27,708.11
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01 1040	132769	02/12/2008	103S-08		27,708.11
01 1040	132132	01/23/2008	101s-08		27,708.11
01 1040	131394	01/08/2008	101S2-08		27,708.11
01 1040	130499	11/29/2007	W97s6-08		55,416.22
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01 1040	126067	06/28/2007	95S-07		55,416.22
01 1040	124376	05/04/2007	79s-07		27,708.11
01 1040	123108	04/03/2007	79s-07		27,708.11
01 1040	122811	03/29/2007	71SS-07		27,708.11
01 1040	120768	02/01/2007	63S-07		27,708.11
01 1040	120158	01/22/2007	55ss-07		27,708.11
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01 1040	117696	11/16/2006	39s-07		27,708.11
01 1040	117252	11/03/2006	39S-07		27,708.11
01 1040	115924	10/06/2006	31s-07		27,708.11
01 1040	115436	10/03/2006	31S-07		27,708.11
01 1040	114207	07/19/2006	95SE-06		27,708.11
01 1040	113150	06/21/2006	95s-06		27,708.11
01 1040	110963	04/25/2006	79S-06		27,708.11
01 1040	110059	04/07/2006	74S-06		55,416.22
01 1040	109117	02/23/2006	63ss-06		55,416.22
01 1040	107182	01/12/2006	55S-06		27,708.11
01 1040	104997	10/20/2005	31s-06		27,708.11
01 1040	102127	07/15/2005	84SYB-05		83,124.33
01 1040	99732	06/10/2005	84s1-05		83,124.33
01 1040	98179	04/06/2005	70S-05		27,708.11
01 1040	97061	03/02/2005	63S-05		27,708.11
01 1040	96291	02/16/2005	56s-05		27,708.11
01 1040	94928	01/26/2005	49S-05		27,708.11
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01 1040	90111	09/09/2004	21S-05		27,708.11
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01 1040	87270	06/29/2004	213s-04		6,228.88
01 1040	85170	04/22/2004	178S;04		22,094.85
01 1040	84537	04/07/2004	178S-04		13,871.85
01 1040	82753	02/20/2004	142S-04		13,871.85
01 1040	82039	02/05/2004	125s-04		19,257.83
01 1040	80670	12/31/2003	107S:04		13,871.85
01 1040	73252	05/28/2003	188s-03		13,871.85
01 1040	72269	04/28/2003	171s-03		13,871.85
01 1040	71071	03/28/2003	154s-03		17,773.81
01 1040	69576	02/11/2003	137S-03		13,871.85
01 1040	69097	01/30/2003	119S.03		17,746.95
01 1040	68443	01/14/2003	119S-03		3,214.47
01 1040	67714	12/23/2002	101s.03		13,871.85
01 1040	66764	12/09/2002	101S-03		17,605.38
01 1040	65230	11/01/2002	83S-03		17,932.17
01 1040	64558	10/11/2002	65S-03		24,331.88
					2,963.39

GREATER LAWRENCE SANITARY DISTRICT

CHECK HISTORY REPORT

SORTED BY CHECK NUMBER

ACTIVITY FROM: 01/01/01 TO: 10/15/08

BANK CODE: A BANK OF AMERICA-GENERAL FUND

CHECK NUMBER	CHECK DATE	VENDOR NUMBER	NAME	CHECK AMOUNT	
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00	
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00-	(REVRSL)
021208	03/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00	
021668	07/31/01	00 - DIADAM	CARMINE W DIADAMO ESQ	20,887.50	
021986	10/24/01	00 - DIADAM	CARMINE W DIADAMO ESQ	9,971.43	
022890	06/26/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,300.00	
023159	08/28/02	00 - DIADAM	CARMINE W DIADAMO ESQ	13,110.40	
023404	10/30/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,402.40	
025767	07/28/04	00 - DIADAM	CARMINE W DIADAMO ESQ	37,828.22	
025910	09/29/04	00 - DIADAM	CARMINE W DIADAMO ESQ	500.00	
026487	02/18/05	00 - DIADAM	CARMINE W DIADAMO ESQ	18,240.00	
027563	12/15/05	00 - DIADAM	CARMINE W DIADAMO ESQ	12,208.00	
028047	05/26/06	00 - DIADAM	CARMINE W DIADAMO ESQ	43,119.00	
028254	07/21/06	00 - DIADAM	CARMINE W DIADAMO ESQ	340.00	

BANK A TOTAL: 219,281.95

REPORT TOTAL: 219,281.95

10/06/2008 09:01
1000mgil

CITY OF LAWRENCE
CHECKS BROWSE

PG 2
apvdrmnt

Cash Account	Check #	Check Date	Warrant	Clr	Cleared	Da	Amount
01 1040	64094	09/23/2002	47SB03				13,871.85
01 1040	63406	08/30/2002	30s-03				41,615.55
01 1040	61391	06/27/2002	217s-02				532.13
01 1040	60136	05/21/2002	198s-02				13,871.85
01 1040	58976	04/26/2002	179S-02				13,871.85
01 1040	58321	04/08/2002	179S-02				8,208.72
01 1040	57604	03/22/2002	160s-02				13,871.85
01 1040	56838	03/07/2002	160S-02				13,871.85
01 1040	55308	01/29/2002	124SD-02				18,547.70
01 1040	54058	12/26/2001	106s-02				20,644.68
01 1040	52717	11/26/2001	87SA-02				13,871.85
01 1040	52345	11/19/2001	87S-02				22,070.09
01 1040	50268	09/19/2001	52s-02				55,487.40
01 1040	47687	07/13/2001	212SS-01				12,714.08

Vendor 21783 DIADAMO CARMINE W has 68 Checks for: 1,759,954.24

** END OF REPORT - Generated by Maria Gilbert **

Check No. 0

Export to Excel

Check No.	Bark ID	Check Date	Amount	Status
30455	1-GENFUNDC	12/29/2006	\$23,520.00	R
31025	1-GENFUNDC	5/22/2007	\$39,300.00	R
31291	1-GENFUNDC	9/21/2007	\$3,955.00	R
31409	1-GENFUNDC	10/26/2007	\$4,476.00	R

Check No: 0

 Export to Excel

Check No	Bank ID	Check Date	Amount	Status
30455	1-GENFUNDC	12/29/2006	\$23,520.00	R
31025	1-GENFUNDC	6/22/2007	\$39,300.00	R
31291	1-GENFUNDC	9/21/2007	\$3,955.00	R
31409	1-GENFUNDC	10/26/2007	\$4,475.00	R

EXHIBIT C

From: william@diadamo.com
To: tdugjr@aol.com
Sent: 9/24/2008 2:40:18 P.M. Eastern Daylight Time
Subj: Complaint

Tom:

I enclose herewith draft of a proposed lawsuit. You may view it as the "prior notice" that you did not give to us prior to the general dissemination of absolutely false information. You made noises like you wanted to investigate and rectify your conduct, but, having in mind the time elapsed and the outrageousness of the allegations, we are now treating it as what we thought it was in the first place, just noise.

This is being forwarded to you so you can discuss the consequences with Paula and engage counsel. The purpose of the original discussion is for you to determine whether or not you want to accept service or have the deputy sheriff serve the complaint upon you on Monday, the date the document will be filed in Court. The real purpose of this communication is to advise you to engage counsel because we will be moving that the Court expedite this matter and order depositions at the earliest possible time so that we can determine to what extent each of the proposed culprits is liable.

I should add that I'm not interested in any further protestations to the effect that you were acting appropriately or your busy schedule has prevented further investigation. We have hinted in prior communications that we are reasonably sure of the sources of the story, the motives for slipping the information to you and what we intend to do to ensure that this odious behavior is confronted straight up and a very bright line is shined on the culpable parties.

Affirmation of your certitude and rectitude are best left to the media you control, the Dewey Club or North Andover card games; I am more comfortable with assertions under oath where the consequences are very real. You were shown a large door to walk through; you apparently chose a dark cellar.

Finally, Tom, don't misconstrue the fact that my father is listed as counsel. This is from me. My father is counsel because (1) he is the best lawyer I know, (2) he will do what is necessary and proper, and (3) if I let someone else handle it, he would be madder at me than you. He wants at it.

William DiAdamo
DiAdamo Law Office LLP
40 Appleton Way
Lawrence, MA 01840
978-685-4271
william@diadamo.com

=

EXHIBIT D

Bill & Carmine,

This is to inform you in writing of the offer made to you yesterday (and once previously) on the phone by Attorney Paula Porten giving you the opportunity (again) to appear on the Paying Attention! Radio Program on WCAP in LOWELL to tell your side of the story or dispute anything you feel was stated inaccurately on previous shows in regard to your being fired by the city of Lawrence while I continue my investigation.

I will make available as much time as you feel you need, should you choose to come in or call in to the show on any Saturday between 10am and noon. The studio number is 978-458-9123.

Please also know that if you precede with filing a complaint against us, we will vigorously defend ourselves, introduce emails, phone conversations, call witnesses and file appropriate counter claims, ethics and BBO complaints.

I was hoping that your (Carmine's) obsession for "revenge" to "punish" my sources would be eventually tempered by the fact that you (BILLY) have WAY more to lose here than I do if this goes forward. But, be on notice from here on in, there will be no further communications between us and the investigation I began a month or so ago will continue on my time schedule.

Tom Duggan
The Valley Patriot
www.valleypatriot.com
978-557-5413

In a message dated 9/24/2008 2:40:18 P.M. Eastern Daylight Time, william@diadamo.com writes:

Tom:

I enclose herewith draft of a proposed lawsuit. You may view it as the "prior notice" that you did not give to us prior to the general dissemination of absolutely false information. You made noises like you wanted to investigate and rectify your conduct, but, having in mind the time elapsed and the outrageousness of the allegations, we are now treating it as what we thought it was in the first place, just noise.

This is being forwarded to you so you can discuss the consequences with Paula and engage counsel. The purpose of the original discussion is for you to determine whether or not you want to accept service or have the deputy sheriff serve the complaint upon you on Monday, the date the document will be filed in Court. The real purpose of this communication is to advise you to engage counsel because we will be moving that the Court expedite this matter and order depositions at the earliest possible time so that we can determine to what extent each of the proposed culprits is liable.

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Finally, Tom, don't misconstrue the fact that my father is listed as counsel. This is from me. My father is counsel because

EXHIBIT B

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT

ESSEX, ss

SUPERIOR COURT
CIVIL DIVISION
No. 08-1931-D

WILLIAM H. DIADAMO,)
) Plaintiff,)
))
v.)
))
THOMAS J. DUGGAN, JR,)
VALLEY PATRIOT, Inc.,)
MERRIMACK VALLEY RADIO, LLC,)
JOHN DOE ONE, and)
JOHN DOE TWO,)
) Defendants.)

**AFFIDAVIT
OF PAULA PORTEN**

I, Paula Porten, being duly sworn do oath hereby state:

1. I am an attorney in good standing in the Commonwealth of Massachusetts.
2. I am also a news writer for a newspaper known as *The Valley Patriot*, published monthly with a circulation in the Merrimack Valley including Lawrence, Massachusetts.
3. I have had several conversations with the plaintiff, William H. DiAdamo.
4. William H. DiAdamo has been an undisclosed source of several news articles that have been written for *The Valley Patriot*.
5. William H. DiAdamo was the undisclosed source of the news article disclosing the confidential settlement agreement between his client, the City of Lawrence, and

the former Assistant City Clerk, Jennifer Padellaro, who accused the former City clerk of harassment.

6. William H. DiAdamo in a court room at the Department of Industrial Accidents, disclosed the details of the Padellaro settlement which became the lead story in the January 2008 edition of the newspaper and in which the following quote appeared: "A hearing on the matter was scheduled for October 12, 2007, where it was believed by City Hall insiders that the judge was going to award double benefits. That's when the parties negotiated a settlement for a lump sum of \$610,000, which was approved on November 30th." Mr. DiAdamo was the "city hall insider."
7. William H. DiAdamo has spoken to me on several occasions regarding the Andrea Traficanti case which he was the lawyer representing the City of Lawrence against Ms. Traficanti.
8. William H. DiAdamo told me he met with Mayor Sullivan, Michael Sweeney of Planning, and Thomas Schiavone at City Hall prior to the IAB hearing to discuss settlement. All three City Officials did not want to settle.
9. After the broadcast of the radio program statements that he was terminated by the City of Lawrence, which form one of the causes of action in the Complaint, William H. DiAdamo told me that it was his life's mission to destroy the Mayor's (Michael J. Sullivan) and Sweeney's (Michael Sweeney, the City Dir. Of Planning), lives, put them in jail, and do whatever necessary to destroy and ruin them.
10. William H. DiAdamo told me that he was not prepared to defend the City of Lawrence in the Andrea Traficanti workers' compensation case.

11. I offered William H. DiAdamo photographers of Andrea Traficanti at a political fundraiser dancing and drinking at the French Social Club with City Hall employees before the workers' compensation hearing to use as evidence. I know that Andrea was claiming stress on the job and she could not work in City Hall, but her she was with these same employees partying. Atty. DiAdamo refused the photographs.

12. All of the above facts were told to Thomas J. Duggan. These facts, except for paragraph 9, were told to Mr. Duggan before the statements he made on the radio program which forms the basis of this action.

Signed under the pains and penalties of perjury this November 24, 2008.

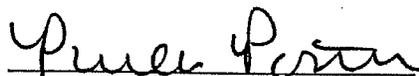

Paula Porten

EXHIBIT C

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT**

ESSEX, ss

SUPERIOR COURT
CIVIL DIVISION
No. 08-1931-D

WILLIAM H. DIADAMO,)
Plaintiff,)
)
v.)
)
THOMAS J. DUGGAN, JR,)
VALLEY PATRIOT, Inc.,)
MERRIMACK VALLEY RADIO, LLC,)
JOHN DOE ONE, and)
JOHN DOE TWO,)
Defendants.)
)

**AFFIDAVIT
OF MICHAEL SWEENEY**

I, Michael Sweeney, being duly sworn do oath hereby state:

1. I am the Director of Planning for the City of Lawrence, Massachusetts; I am also a licensed attorney in the Commonwealth of Massachusetts.

2. William H. DiAdamo came to the Mayor's office at City Hall unannounced on or before the day of the Andrea Traficanti workers' compensation hearing and met with me and another city official.

3. William H. DiAdamo told me and the other city official that he was not prepared to defend the Andrea Traficanti workers' compensation case scheduled for a hearing on or about the day after his coming to City Hall for this meeting with me and another city official.

4. William H. DiAdamo told me that he had not yet gathered enough evidence or testimony to argue the case. He said "I don't know what I'm going to do

today/tomorrow.” “I am unprepared.” This was the first time I heard this. I was stunned.

5. I then told William H. DiAdamo that I could and would testify with relevant information. That maybe he should subpoena me and several current and former City Hall employees to testify. He asked “Are you guys here today/tomorrow?” I said that I would be available the entire day. He didn’t ask for any other information or materials.
6. Over the next 48 hours I remained available and able to testify at a moment’s notice. I never received a call or other request from Atty. DiAdamo to testify.
7. I further told William H. DiAdamo at that meeting, that I had the names of other people, both current and former City Hall employees, who could help his case. I gave him all the names. I do not know if Atty. DiAdamo called or subpoenaed any of these potential witnesses.
8. At the meeting William H. DiAdamo said that Frank McCann was always in his law office talking to his father, Atty. Carmine DiAdamo, about the Andrea Traficanti case. Atty DiAdamo told me that he was uncomfortable even handling this case. I was shocked at his disclosure and lack of case preparation.
9. At the meeting William H. DiAdamo said that he was uncomfortable handling this case (Andrea Traficanti), was unprepared to answer her allegations; and he asked the question whether we wanted the case to be settled.
10. I asked William H. DiAdamo if he had a conflict in this case after his disclosure regarding Frank McCann. I then told him that I thought he had a conflict handling this case.

11. I made it clear to William H. DiAdamo that I was ready and able to help.

Subsequent to the meeting, there was no communication from Atty. DiAdamo about my information, or the results of the hearing, or any requests for the contact information of the people I told him would be willing to help him in the Andrea Traficanti case.

Signed under the pains and penalties of perjury this November 24, 2008.

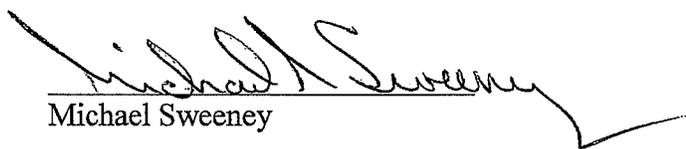

Michael Sweeney

EXHIBIT D

GREATER LAWRENCE SANITARY DISTRICT

SORTED BY CHECK NUMBER

CHECK HISTORY REPORT

ACTIVITY FROM: 01/01/01

TO: 10/15/08

BANK CODE: A BANK OF AMERICA-GENERAL FUND

CHECK NUMBER	CHECK DATE	VENDOR NUMBER	NAME	CHECK AMOUNT
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00
021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00- (REVRSL)
021208	03/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00
021668	07/31/01	00 - DIADAM	CARMINE W DIADAMO ESQ	20,887.50
021986	10/24/01	00 - DIADAM	CARMINE W DIADAMO ESQ	9,971.43
022890	06/26/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,300.00
023159	08/28/02	00 - DIADAM	CARMINE W DIADAMO ESQ	13,110.40
023404	10/30/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,402.40
025767	07/28/04	00 - DIADAM	CARMINE W DIADAMO ESQ	37,828.22
025910	09/29/04	00 - DIADAM	CARMINE W DIADAMO ESQ	500.00
026487	02/18/05	00 - DIADAM	CARMINE W DIADAMO ESQ	18,240.00
027563	12/15/05	00 - DIADAM	CARMINE W DIADAMO ESQ	12,208.00
028047	05/26/06	00 - DIADAM	CARMINE W DIADAMO ESQ	43,119.00
028254	07/21/06	00 - DIADAM	CARMINE W DIADAMO ESQ	340.00

BANK A TOTAL: 219,281.95

REPORT TOTAL: 219,281.95

EXHIBIT E

10/06/2008 09:12
1000mgil

CITY OF LAWRENCE
CHECKS BROWSE

PG 1
apvdrmt

Cash Account	Check #	Check Date	Warrant	Clr	Cleared	Da	Amount
							7,700.43
01 1040	96292	02/16/2005	56s-05				6,893.85
01 1040	94109	01/03/2005	42s-05				39,356.19
01 1040	92612	11/29/2004	35s-05				30,747.44
01 1040	91932	11/10/2004	35s-05				33,856.51
01 1040	91500	10/27/2004	28s-05				.00
01 1040	91385	10/26/2004	28s-05	V			92,242.32
01 1040	88649	07/28/2004	213Yes04				14,819.84
01 1040	87271	06/29/2004	213s-04				14,819.84
01 1040	85171	04/22/2004	178s;04				18,722.09
01 1040	84538	04/07/2004	178s-04				14,819.84
01 1040	82754	02/20/2004	142s-04				14,819.84
01 1040	82040	02/05/2004	125s-04				14,819.84
01 1040	80671	12/31/2003	107s-04				14,819.84
01 1040	75958	08/14/2003	36s-04				197,114.01
01 1040	73253	05/28/2003	188s-03				14,819.84
01 1040	72270	04/28/2003	171s-03				14,819.84
01 1040	71072	03/28/2003	154s-03				14,819.84
01 1040	69577	02/11/2003	137s-03				14,819.84
01 1040	68444	01/14/2003	119s-03				14,819.84
01 1040	67715	12/23/2002	101s-03				14,819.84
01 1040	66765	12/09/2002	101s-03				14,819.84
01 1040	65231	11/01/2002	83s-03				14,819.84
01 1040	64095	09/23/2002	47SB03				14,819.84
01 1040	63407	08/30/2002	30s-03				44,459.52
01 1040	60137	05/21/2002	198s-02				14,819.84
01 1040	58977	04/26/2002	179s-02				14,819.84
01 1040	57605	03/22/2002	160s-02				14,819.84
01 1040	56839	03/07/2002	160s-02				14,819.84
01 1040	55309	01/29/2002	124SD-02				14,819.84
01 1040	54059	12/26/2001	106s-02				14,819.84
01 1040	52718	11/26/2001	87SA-02				14,819.84
01 1040	52346	11/19/2001	87s-02				14,819.84
01 1040	50269	09/19/2001	52s-02				59,279.36

Vendor 21784 DIADAMO CARMINE W has 33 Checks for: 856,408.20

** END OF REPORT - Generated by Maria Gilbert **

10/06/2008 09:01
1000mgil

CITY OF LAWRENCE
CHECKS BROWSE

PG 1
apvdrmt

Cash Account	Check #	Check Date	Warrant	Clr Cleared Da	Amount
01 1040	140445	08/28/2008	0915S		27,708.11
01 1040	139174	07/17/2008	111YE-08		27,708.11
01 1040	137681	06/16/2008	111S-08		27,708.11
01 1040	136269	05/06/2008	109S-08		27,708.11
01 1040	135404	04/18/2008	107S-08		27,708.11
01 1040	133723	03/06/2008	103s-08		27,708.11
01 1040	132769	02/12/2008	103S-08		27,708.11
01 1040	132132	01/23/2008	101s-08		27,708.11
01 1040	131394	01/08/2008	101S2-08		55,416.22
01 1040	130499	11/29/2007	W97s6-08		55,416.22
01 1040	126949	07/24/2007	95SE-07		55,416.22
01 1040	126067	06/28/2007	95S-07		27,708.11
01 1040	124376	05/04/2007	79ss-07		27,708.11
01 1040	123108	04/03/2007	79s-07		27,708.11
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01 1040	120768	02/01/2007	63S-07		27,708.11
01 1040	120158	01/22/2007	55ss-07		27,708.11
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01 1040	117252	11/03/2006	39S-07		27,708.11
01 1040	115924	10/06/2006	31s-07		27,708.11
01 1040	115436	10/03/2006	31S-07		27,708.11
01 1040	114207	07/19/2006	95SE-06		27,708.11
01 1040	113150	06/21/2006	95s-06		27,708.11
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01 1040	110059	04/07/2006	74S-06		55,416.22
01 1040	109117	02/23/2006	63ss-06		27,708.11
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01 1040	102127	07/15/2005	84SYE-05		83,124.33
01 1040	99732	06/10/2005	84s1-05		27,708.11
01 1040	98179	04/06/2005	70S-05		27,708.11
01 1040	97061	03/02/2005	63S-05		27,708.11
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01 1040	89381	08/23/2004	14S:05		6,228.88
01 1040	87270	06/29/2004	213s-04		22,094.85
01 1040	85170	04/22/2004	178S;04		13,871.85
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01 1040	82039	02/05/2004	125s-04		13,871.85
01 1040	80670	12/31/2003	107S:04		13,871.85
01 1040	73252	05/28/2003	188s-03		13,871.85
01 1040	72269	04/28/2003	171s-03		17,773.81
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01 1040	69097	01/30/2003	119S.03		3,214.47
01 1040	68443	01/14/2003	119S-03		13,871.85
01 1040	67714	12/23/2002	101s.03		17,605.38
01 1040	66764	12/09/2002	101S-03		17,932.17
01 1040	65230	11/01/2002	83S-03		24,331.88
01 1040	64558	10/11/2002	65S-03		2,963.39

GREATER LAWRENCE SANITARY DISTRICT

CHECK HISTORY REPORT

SORTED BY CHECK NUMBER

ACTIVITY FROM: 01/01/01 TO: 10/15/08

BANK CODE: A BANK OF AMERICA-GENERAL FUND

CHECK NUMBER	CHECK DATE	VENDOR NUMBER	NAME	CHECK AMOUNT
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021178	02/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00- (REVRSL)
021208	03/28/01	00 - DIADAM	CARMINE W DIADAMO ESQ	34,375.00
021668	07/31/01	00 - DIADAM	CARMINE W DIADAMO ESQ	20,887.50
021986	10/24/01	00 - DIADAM	CARMINE W DIADAMO ESQ	9,971.43
022890	06/26/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,300.00
023159	08/28/02	00 - DIADAM	CARMINE W DIADAMO ESQ	13,110.40
023404	10/30/02	00 - DIADAM	CARMINE W DIADAMO ESQ	14,402.40
025767	07/28/04	00 - DIADAM	CARMINE W DIADAMO ESQ	37,828.22
025910	09/29/04	00 - DIADAM	CARMINE W DIADAMO ESQ	500.00
026487	02/18/05	00 - DIADAM	CARMINE W DIADAMO ESQ	18,240.00
027563	12/15/05	00 - DIADAM	CARMINE W DIADAMO ESQ	12,208.00
028047	05/26/06	00 - DIADAM	CARMINE W DIADAMO ESQ	43,119.00
028254	07/21/06	00 - DIADAM	CARMINE W DIADAMO ESQ	340.00

BANK A TOTAL: 219,281.95

REPORT TOTAL: 219,281.95

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CITY OF LAWRENCE
CHECKS BROWSE

PG 2
apvdrmnt

Cash Account	Check #	Check Date	Warrant	Clr Cleared Da	Amount
					13,871.85
01 1040	64094	09/23/2002	47SB03		41,615.55
01 1040	63406	08/30/2002	30s-03		532.13
01 1040	61391	06/27/2002	217s-02		13,871.85
01 1040	60136	05/21/2002	198s-02		13,871.85
01 1040	58976	04/26/2002	179S-02		8,208.72
01 1040	58321	04/08/2002	179S-02		13,871.85
01 1040	57604	03/22/2002	160s-02		13,871.85
01 1040	56838	03/07/2002	160S-02		18,547.70
01 1040	55308	01/29/2002	124SD-02		20,644.68
01 1040	54058	12/26/2001	106s-02		13,871.85
01 1040	52717	11/26/2001	87SA-02		22,070.09
01 1040	52345	11/19/2001	87S-02		55,487.40
01 1040	50268	09/19/2001	52s-02		12,714.08
01 1040	47687	07/13/2001	212SS-01		

Vendor 21783 DIADAMO CARMINE W has 68 Checks for: 1,759,954.24

** END OF REPORT - Generated by Maria Gilbert **

Check No. | 0 | Export to Excel

Check No.	Bank ID	Check Date	Amount	Status
30358	1-GENFUNDCH	12/22/2006	\$23,520.00	R
30455	1-GENFUNDCH	5/22/2007	\$39,300.00	R
31025	1-GENFUNDCH	9/21/2007	\$3,955.00	R
31291	1-GENFUNDCH	10/26/2007	\$4,476.00	R
31409	1-GENFUNDCH			

Check No. 0

Check No	Bank ID	Check Date	Amount	Status
30455	1-GENFUNDCH	12/29/2006	\$23,520.00	R
31025	1-GENFUNDCH	6/22/2007	\$39,300.00	R
31291	1-GENFUNDCH	9/21/2007	\$3,955.00	R
31409	1-GENFUNDCH	10/26/2007	\$4,476.00	R