

United States District Court
District Of Maine

Mark W. Eves,

Plaintiff,

v.

Paul R. LePage,

Defendant.

Docket No.:

**Complaint and Demand for Jury Trial;
Injunctive Relief Sought**

Mark W. Eves files this complaint against Paul R. LePage, the Governor of the State of Maine. LePage is being sued for money damages solely in his individual and personal capacities and not in his official capacity. LePage is being sued in his official capacity solely for purposes of non-monetary relief, including injunctive and declaratory relief.

Summary of the Action

1. Acting out of personal rage, vindictiveness, and partisan malice, in June 2015 Governor Paul LePage blackmailed a private school that serves at-risk children in order to force it to fire its President, the Speaker of

Maine's House of Representatives. LePage knowingly broke federal law by threatening the School's Board Chair – in a secret, handwritten note – that state funding of over \$500,000 budgeted for the School would be withheld unless the Speaker was fired. The Governor knew that the unexpected loss of that state funding would also cause the School to lose another \$2,000,000 in private funding and that these sudden financial losses would put the school out of business.

2. LePage, a Republican, retaliated against the Speaker, a Democrat, solely on political grounds because of the Speaker's free speech and other First Amendment activities speaking out against and opposing some of the Governor's policies that were bad for Maine, including those relating to education, energy, and taxation.

3. Only a few weeks earlier on May 29, LePage began a press conference with a personal tirade directed against the Speaker, including the comment that "Frankly, I think the Speaker of the House should go back home [to California] where he was born." At this press conference, LePage repeatedly displayed intense personal animosity toward and hurled personal epithets at the Speaker and other Democratic legislators over their opposition to the Governor's energy policies and his proposal to abolish the income tax.

4. Because of LePage's blackmail, the School was forced to fire the Speaker without cause on June 24. LePage's blackmail of the School unfairly and without due process took away the Speaker's job that he was counting on to support his wife and three young children.

5. LePage's blackmail of the School is part of a well-known pattern of using his powers as governor to bully and intimidate anyone who dares to disagree with him. LePage's continuing abuses of power for partisan purposes threaten to destroy the ability of Maine's citizen Legislature to serve its vital constitutional function as an independent check on the power of the executive branch.

6. Under Maine law, "[m]embership in the Legislature is not a full-time occupation and is not compensated on that basis. Thus, "[m]ost Legislators must look to income from private sources, not their public salaries, for their sustenance and support for their families" 1 M.R.S. § 1011.

7. The Speaker brings this action to seek justice for him and his family. And also to defend the constitutional right of Maine's people to an independent Legislature able to do the people's business based on their best judgment and without fear of political intimidation or vendetta by the executive branch.

8. If LePage is not held personally accountable for his extreme abuse of power against the highest official of Maine's Legislature, then in the future no Maine citizen or legislator will feel safe in opposing a Governor's bad policies for fear that the Governor will use the money and power of their government to go after their family and livelihood. In short, a Governor is not above the law and LePage's abuse of taxpayer money to retaliate against the Speaker of the House and to shut down healthy public debate must not be allowed to stand.

Parties

9. Plaintiff, Mark W. Eves, is a life-long citizen of the United States and is a resident of North Berwick, York County, Maine.

10. Eves is serving his fourth term in the Maine House of Representatives. Due to term limits, he is ineligible to be re-elected.

11. Defendant, Paul R. LePage, is the Governor of the State of Maine.

Jury Trial Demand

12. Under Fed. R. Civ. P. 38(b), Eves demands trial by jury on all issues triable to a jury.

Jurisdiction and Venue

13. This action arises under 42 U.S.C. § 1983. This Court has proper subject matter jurisdiction over Plaintiff's federal claims under 28 U.S.C. §§ 1341 (federal question) and 1343 (civil rights).

14. Venue is proper in the District of Maine under 28 U.S.C. § 1391(e) (3) because Plaintiff resides in Maine. Under Rule 3(b) of the Rules of this Court, this action is properly filed in Portland because Plaintiff lives in York County.

Statement of Facts Showing that Eves has Strong Legal Claims for Relief

Eves comes from a family with public service values

15. Eves's father was a pastor in the U.S. Military during World War II and his mother was a school teacher. He is the youngest of seven children and was born in California in 1977.

16. Eves's parents raised him and his six siblings to give back to their communities and to serve the public.

17. After moving several times, his large family ultimately settled in Louisville, Kentucky. From the age of 11, Eves grew up in Louisville.

18. In 2000 Eves earned a B.A. from the University of Louisville. In 2003 he earned a Master's degree in marriage and family therapy from the Louisville Presbyterian Theological Seminary.

19. Eves met his wife, Laura, while they were both enrolled in the same master's degree program. They were married a year later.

Eves and his wife chose to raise their family in Maine

20. In 2003 Eves and his wife moved to North Berwick, Maine. They wanted to live close to Eves' parents in York and in an ideal place to raise a family with good values.

21. They had their first child in 2005, second in 2007, and third in 2009.

Eves chose a profession helping families in need

22. In his professional life, Eves is a trained marriage and family therapist. He has over 15 years of experience working in the field of behavioral health and family therapy, as both a clinician and administrator for statewide community health organizations like Sweetser, Odyssey House, and Woodfords Family Services.

23. Eves also ran his own clinical private practice. He counseled and helped develop school and community-based programs to help children, adults, and seniors struggling with mental illness and deep poverty.

24. From about 2003 to 2004, Eves worked as a Program Director and Family Therapist for Odyssey Children's Therapeutic Center in Sanford, Maine. He oversaw the daily operations of the residential program, including hiring and training of staff, maintaining licensing standards, and building relationships with community agencies, organizations, and providers. Eves also provided individual, group, and family therapy to early school age children with emotional and behavioral challenges, with the ultimate goal of reunification with their families.

25. From about 2004 to 2006, Eves worked as a clinician for Sweetser in Springvale, Maine. In that position, he provided home-based family therapy to at-risk families in York County and worked collaboratively with families to prevent out-of-home placement of children and to facilitate successful family reunifications.

26. From about 2006 to 2010, Eves worked as a Clinical Supervisor for Sweetser in Sanford, Maine. He supervised school-based, home-based, and mental health targeted case managers for at risk youth. He also managed program budgetary targets.

27. From about 2009 to 2012, Eves worked as a Private Practice Outpatient Therapist in Sanford, Maine. He provided individual and family therapy to low income families and at-risk youth.

28. From about 2010 to 2013, Eves worked as the Director of Business Development for Sweetser in Saco, Maine. He reported directly to the Chief Executive Officer on organizational opportunities and progress with strategic partnerships. He was highly successful in increasing Sweetser's business, including growing partnerships with hospitals, physicians, and community organizations across the state.

29. From about July 2013 until December 2013 Eves worked as the Psychiatry Program Outreach Coordinator for Woodfords Family Services, in Westbrook, Maine. He worked with the executive management team to develop, implement, and achieve goals for growing the psychiatry program and he tracked budgetary goals for the program and made adjustments as needed to achieve agency goals.

Eves has demonstrated exceptionally strong leadership skills

30. Soon after becoming a member of the Maine Association for Marriage and Family Therapy, Eves joined its legislative committee where he discovered his interest and aptitude for the political process.

31. Eves served as President of the Maine Association for Marriage and Family Therapy from 2006 to 2008.

32. After serving as president of MEAMFT, in 2008 he successfully ran for state representative in his home district. During his first two terms in the Maine Legislature, he served on the Health and Human Services Committee, including two years as the ranking House minority member.

33. In 2010, Eves was recognized as one of only 40 elected officials nationwide to receive the Toll Fellow leadership award

34. In 2012, Eves was elected Speaker of Maine's House of Representatives. In 2014, he was unanimously reelected to be the Speaker. Eves is the first Speaker to serve two consecutive terms since 1994.

35. During each of his two terms as Speaker, Eves had to demonstrate strong and effective leadership skills to find middle ground with legislators and leaders of both parties. He shepherded the passage of two state budgets that were approved by two-third votes of both houses of the Maine Legislature.

36. As Speaker, Eves was also responsible for the operating budget and management of the House of Representatives and the non-partisan offices including the Office of the Executive Director, Office of Fiscal and Policy

Review, Office of Information Technology, Office of Policy and Legal Analysis, and the Office of Program Evaluation and Government Accountability.

37. As of 2015, members of the Maine State Legislature are paid a total salary over two years of \$24,056: \$14,074 per year (first regular session) and \$9,982 per year (second regular session). Legislators also receive \$38/day per diem for one of two options: housing or mileage and tolls.

Eves applies for a job opening with the non-profit Good Will-Hinckley School for at-risk children

38. Good Will-Hinckley (“Hinckley”) originally opened as a farm, school and home for needy boys in 1889 and offers numerous educational, counselling, and social services programs to help at-risk youth. Hinckley is located in Fairfield, Maine.

39. Hinckley has operated on donations and government grants for most of its existence.

40. Hinckley is a not-for-profit organization. It remains focused and committed to serving at risk and non-traditional students from across Maine.

41. In September 2013, Hinckley opened a charter school, called the Maine Academy of Natural Sciences. Hinckley also operates several other institutions on its campus, including a college step-up program, in partnership with Kennebec Valley Community College; the Glen Stratton Learning Center

for youth with emotional and behavioral challenges; a nutrition program; the Carnegie Library; and the LC Bates Museum.

42. The charter school has its own board of directors and principal.

43. In September 2014, the then president of Hinckley, Glenn A. Cummings, resigned after serving in the position for about four years. Cummings had been Speaker of the House for two years beginning in December 2006.

44. After President Cummings resigned, Hinckley conducted a 9-month, nationwide search for a successor. This search was led by its Interim President Rich Abramson.

45. In March 2015, Eves applied for the open position of President of Hinckley.

46. In his cover letter for the Hinckley job, Eves explained why he was highly qualified for the position: “I have spent most of my career outside of the Legislature working in the field of behavioral health, both as a clinician and as part of an administrative team. . . . I have experience working in multiple educational settings including public schools and day treatment programs. I am extremely passionate about establishing structures and systems that support children facing significant barriers in their lives to thrive and succeed. My integrity, strong leadership skills, extensive

fundraising experience, and effective communication skills make me an excellent candidate for this position.”

47. Eves’s application was supported by a strong reference from the CEO he worked for at Sweetser, Carl Pendleton. Pendleton confirmed his strong belief that Eves was highly qualified for the position. He confirmed that Eves was very successful in his business development position growing Sweetser's business, including great success in growing partnerships with hospitals, physicians, and community organizations across the state.

Eves is unanimously chosen by the School Board to be the new President

48. On June 9, 2015, the Hinckley Board of Directors publicly announced that they had unanimously selected Eves as their next President.

49. The Hinckley Board's June 9 written statement detailed why Eves was their unanimous choice, including his work experience as a behavioral counselor dealing with at risk children and families, his clinical and administrative experience in the field of behavioral health, “as well as his statewide policy and leadership experience as Speaker of the Maine House of Representatives.”

50. The Hinckley Board's June 9 written statement included the following:

- “As duly elected stewards of a beloved, 125 year old Maine educational institution, the Hinckley Board of Directors authorized a national search for a new president in September 2014,” said John P. Moore, Chairman of the Hinckley Board. “After a rigorous, professionally run nine-month process of interviews and meetings with teachers, staff and Board members assembled as the selection committee, the Board voted unanimously* to offer the presidency to Mark Eves.”

- “The Good Will-Hinckley Board of Directors and senior staff believe strongly that Mark Eves’ professional credentials and career in psychology and family therapy, as well as his statewide policy and leadership experience as Speaker of the Maine House of Representatives make him the best candidate to lead our school’s work creating opportunity for at risk and non-traditional students from across Maine,” said Moore. “It was clear to our staff and our Board of Directors throughout the extensive interview process that Mark is truly dedicated to helping families and children who are struggling and has dedicated his life to that work.”

- “Mark Eves has worked in the field of behavioral health for the past 15 years. He has a graduate degree and professional working experience that make him a very qualified candidate. The work history includes clinical, administrative, and leadership responsibilities that he has excelled at. Mark Eves has worked for multiple non-profit organizations as a clinician and in administrative roles.”

- “Mark Eves has developed a reputation of being a collaborator, problem-solver, and having an excellent work ethic. In addition he is very well respected by his peers- as indicated in Senator Roger Katz letter of reference.” . . . “**Per standard practice, any board member with political or personal ties recused themselves throughout the process.*”

51. The Hinckley Board reasonably recognized that its President needed fundraising skills, as well as leadership and budgeting skills. The job description for the President of Hinckley includes the following qualifications: successful management of financial systems, budgeting, facilities development, and fundraising; administrative experience in strategic planning, evaluation of staff, institutional changes, and technology implementation; and experience working with legislators, state policy makers, and governmental agencies.

As of June 9, LePage had publicly declared his personal animosity toward Eves because of Eves's opposition to the Governor's proposed policies on education, energy, and taxation.

52. On April 16, 2015, LePage issued a public statement personally attacking Eves for making public statements opposing LePage's proposal to eliminate Maine's income tax. In this statement, LePage accused Eves of "ideological fabrication" and further declared that "Speaker Eves may be a competent marriage counselor, but he does not understand economics."

53. On May 29, 2015, LePage began a press conference with a personal tirade directed against the Speaker, including the comment that "Frankly, I think the Speaker of the House should go back home [to California] where he was born." At this press conference, LePage repeatedly displayed intense personal animosity toward and hurled personal epithets at the Speaker and other Democratic legislators over their opposition to the Governor's energy policies and his proposal to abolish the income tax. LePage repeatedly denounced the Speaker and other Democratic leaders as acting like "children."

54. On June 8, 2015, LePage sent and made public his letter to Hinckley's Board of Directors urging them not to hire Eves. In this letter he complained about Eves for, among other things, the following:

- “Speaker Eves has been a longtime opponent of public charter schools” with the backing of “union bosses”
- News releases by Eves that criticized certain aspects of charter schools and the Governor’s proposed policies regarding charter schools
- Alleging that “Speaker Eves fights every effort to reform Maine’s government”
- Alleging that there was “unabashed political patronage on which this selection is based,” including the alleged improper involvement in the selection decision of a staff assistant to Eves, Bill Brown, and a Democratic member of the Legislature, Erik Jorgensen.

55. In response to this June 8 letter by the Governor, on June 9 the spokesman for Hinckley explained that Brown and Jorgensen both stayed out of the presidential selection process and did not vote. The spokesperson for Hinckley also explained that its hiring process was "apolitical", that there are Republicans on their board as well as Democrats, and that the vote was unanimous.

56. Hinckley's Chairman of the Board, John P. Moore, is a Republican and he contributed to the campaigns of U.S. Sen. Susan Collins and U.S. Rep. Bruce Poliquin, both Republicans.

57. Eves did not comment specifically on the Governor's June 8 letter to the school. He said he and the Governor both agree the school is "one of the greatest resources in the state for at risk youth."

LePage blackmails Good Will-Hinckley to fire Eves

58. Soon after the June 9 decision of the Hinckley Board to reject LePage's publicly stated reasons why it should not hire Eves, LePage secretly threatened John P. Moore, Chairman of the Hinckley Board. LePage sent to Jack Moore a secret, handwritten note that threatened that essential state funding of over \$500,000 budgeted for the School would be withheld unless the Speaker was fired.

59. The Governor knew that the unexpected loss of that state funding would also cause the School to lose another \$2,000,000 in private funding and that these sudden financial losses would put the school out of business. Hinckley had been receiving critical financial support from the Harold Alfond Foundation, which provided \$1.5 million in 2014 and had committed to another \$4 million in funding in 2015. However, after the Foundation became

aware of LePage's threat to withdraw the \$500,000 or more in funding, on June 18 it wrote to Jack Moore saying it was concerned that the "likely" loss of state funding threatened the school's "future financial viability" and could make it hard for Hinckley to meet enrollment and other goals that the grants required.

60. The Governor made the financial threat to Jack Moore and the Hinckley School out of personal rage, vindictiveness, and partisan malice toward Eves. He was retaliating against Eves solely on political grounds relating to the Speaker's free speech and other First Amendment activities opposing some of the Governor's policies that were bad for Maine, including those relating to education, energy, and taxation.

61. On June 22, 2015, Eves's lawyer communicated with LePage's Chief Counsel and requested that LePage withdraw his threat against the Hinckley School to withhold over \$500,000 unless it fired Eves because that threat violated Eves's clearly established First Amendment rights. Eves's counsel provided LePage's Chief Counsel with copies of two cases upholding similar claims against Governors, including a decision of the United States Court of Appeals for the First Circuit in Boston that has jurisdiction over Maine. On June 23, 2015, LePage's Chief Counsel reported to Eves's lawyer that the Governor would not withdraw his threat.

62. Because of LePage's blackmail, the School was forced to fire the Speaker without cause on June 24.

63. LePage's blackmail of the School unfairly and without due process took away the Speaker's job that he was counting on to support his wife and three young children.

64. LePage's blackmail of the School is part of a well-known pattern of his use of his powers as governor to bully and intimidate anyone who dares to disagree with him. LePage's continuing abuses of power for partisan purposes threaten to destroy the ability of Maine's citizen Legislature to serve its vital constitutional function as an independent check on the power of the executive branch.

65. Under Maine law, "[m]embership in the Legislature is not a full-time occupation and is not compensated on that basis. Thus, "[m]ost Legislators must look to income from private sources, not their public salaries, for their sustenance and support for their families" 1 M.R.S. § 1011.

66. As soon as he was fired on June 24, 2015, Eves told the press about LePage's threat to Hinckley that caused it to fire him. The press immediately began contacting LePage's senior staff to request that he confirm or deny whether he made the threat that state funding of over

\$500,000 budgeted for the School would be withheld unless the Speaker was fired.

67. From June 24 until June 29 LePage and his staff refused to confirm or deny publicly his \$500,000 threat to Hinckley.

68. On about June 25, 2015, Maine State Senate President Mike Thibodeau, a Republican, issued a public statement reading in part: “I am very saddened by this situation and shocked by what is being alleged. Nearly all legislators depend on a career outside of the State House to provide for their families.”

69. Maine State Senator Roger Katz, a widely respected Republican, stated publicly on about June 24 and 25, 2015 as follows: “I just don’t think there is any question that Mark Eves is qualified to lead Good Will-Hinckley. This really goes beyond the political. This is personal and vindictive. I often disagree with Speaker Eves, but he’s a fine and honest man. More importantly, he’s a husband and a father of three beautiful kids who is trying to support his family. Political battles are one thing, but trying to ruin someone economically is quite another.” Katz further said “As time goes on, are we all going to be wondering if a particular vote on something is going to come back to bite us? I hope it doesn’t come to that.”

70. On June 29, LePage publicly admitted for the first time that he had made the \$500,000 threat. “Tell me why I wouldn’t take (back) the taxpayer money to prevent somebody to go into a school and destroy it?” LePage said to reporters during the week of June 29. LePage further said “Because his [Eves’s] heart’s not into doing the right thing for Maine people.”

LePage’s claim that he made the \$500,000 threat because Eves was unqualified is a false excuse to cover up his purely political retaliation

71. When serving in the Maine Legislature, Glen Cummings actively opposed charter schools. LePage has admitted that Glen Cummings was qualified and did a good job as President of Hinckley. LePage strongly supported state funding for Hinckley’s charter school when Cummings was the President of Hinckley.

72. When it selected Eves as its new President, the Hinckley Board reasonably relied on its knowledge that that Glen Cummings had proven to do a good job as its President.

73. LePage has admitted that Richard Abramson was qualified and did a good job as the Interim President of Hinckley. Abramson strongly supported the selection of Eves as the next President and thought Eves was well qualified.

74. It was contrary to LePage’s normal practice to micromanage the selection by a private organization of its leader even when that organization receives state funding.

75. In his July 7, 2015 radio address, LePage made obviously false statements in order to try to justify his \$500,000 threat against Hinckley unless it fired Eves. For example, he falsely and maliciously accused Eves of engaging in criminal misconduct: “Former legislator Paul Violette, the past head of the Maine Turnpike Authority, went to jail for enriching himself and misappropriating public money. . . . These former legislators used their political positions to land cushy, high-paying jobs in which they were trusted to use taxpayer money to improve the lives of Mainers. They abused that trust and had to face the consequences of their actions. The same is true of Mark Eves.”

76. In that same July 7 radio address, LePage also admitted that he made the \$500,000 threat against Hinckley to get Eves fired because of Eves’s public statements and other political activities opposing charter schools: “He [Eves] worked his entire political career to oppose and threaten charter schools in Maine. He is the mouthpiece for the Maine Education Association. Giving taxpayers’ money to a person who has fought so hard against charter schools would be unconscionable.”

77. The charter school operated by Hinckley is obviously substantially different from the types of publicly funded charter schools that Eves has publicly opposed. For example, the Maine Academy of Natural Sciences is not for profit and has an over 100-year record of serving the needs of at-risk and non-traditional youth, many of whom are disadvantaged by poverty.

78. LePage's claim that he forced a private organization to fire its President because the person hired was unqualified is directly contradicted by his practice of hiring unqualified political allies.

79. In 2014, LePage selected Tom Desjardin, a senior political ally with no management or education experience, to lead the Maine Department of Education. Before joining the Governor's team in 2013 as a senior policy advisor, he spent more than a decade as the historian for the Maine Department of Agriculture, Conservation and Forestry.

80. LePage approved awarding his friend Gary Alexander a \$925,000 no-bid Medicaid study contract. Though this report was in large part plagiarized and full of errors, LePage refused to attempt to recover the hundreds of thousands of dollars in taxpayer money paid for this worthless study.

81. As one of his first actions as governor, LePage appointed his then-22-year-old daughter, Lauren LePage, as assistant to his chief of staff. This position came with a \$41,000 annual salary (plus employee benefits estimated to be worth an additional \$15,000 per year). Despite residing in the Blaine House with her father, Lauren also received a housing stipend worth an estimated \$10,000 per year.

82. In February 2012, LePage hired his brother-in-law, Jody Ledoux, as Director of Administrative Services for Maine's State Planning Office, at an annual salary of \$68,577. Ledoux is married to a sister of LePage's wife.

83. LePage hired a Maine CDC Director with no public health experience at a salary of \$188,000. Sheila Pinette had no background in public health although previous CDC Directors had masters in public health policy. In addition, she was politically connected to LePage through his political allies Jennifer Duddy and Tarren Bragdon.

84. In December 2013, LePage appointed an obviously unqualified political ally as the deputy commissioner of finance for the Department of Health and Human Services. Adolphsen graduated from college in 2008. His first job out of college was as a campaign manager for the Maine Senate Republican Committee. After about four years in his next job with the Maine Heritage Policy Center, he was hired to work on January 1, 2013 to be the

director of strategic development for DHHS. He was then promoted by LePage the same year he was hired.

85. LePage coerced Hinckley to fire Eves for reasons unrelated to legitimate governmental interests.

86. The adverse actions taken against Eves by LePage would deter a reasonable person in the same circumstances from exercising their federal rights.

87. LePage acted with malice and reckless disregard in violating Eves's federal rights and in retaliating against Eves for exercising his federal rights.

Legal Claim

88. The allegations in paragraphs 1-87 are realleged.

89. Based on these facts, LePage, while acting under color of state law, violated Eves's federally protected rights, including but not limited to: his First Amendment rights of free speech, free association, and political affiliation; and his 14th Amendment rights to procedural due process regarding his property right in his employment contract with the Good Will-Hinckley School, his liberty and property interests in being free from unreasonable government interference in his private employment, and his

liberty interest in his reputation in connection with the termination of his employment caused by LePage, and to substantive due process.

90. As a direct and proximate result of LePage's violation of Eves's federally protected rights, Eves has suffered and will continue to suffer damages, including, but not limited to, lost wages, lost earning power, loss of enjoyment of a job he was well qualified to perform, loss of the opportunity to derive deep satisfaction by making a major positive difference in the lives of many at-risk children, injury to reputation, and other pecuniary and non-pecuniary losses.

91. Eves requests relief under 42 U.S.C. § 1983 and its related provisions against LePage as follows:

- a. Enter declaratory relief that LePage violated Eves's federal civil rights;
- b. Enter injunctive relief requiring LePage to unequivocally and permanently withdraw his illegal threat to the Hinckley School and to cease using his authority to illegally retaliate against Eves or any other Maine legislators or people;
- c. Award compensatory damages in the amount to be determined at trial by the jury, plus prejudgment interest;

- d. Award punitive damages in the amount to be determined at trial by the jury, plus prejudgment interest thereon;
- e. Award Plaintiff his full costs and reasonable attorney's fees; and
- f. Award nominal damages;
- g. Enter all further relief as is deemed appropriate.

Date: July 30, 2015

Respectfully submitted,

/s/ David G. Webbert

David G. Webbert
Johnson, Webbert & Young, L.L.P.
160 Capitol Street, P.O. Box 79
Augusta, Maine 04332-0079
(207) 623-5110
dwebbert@johnsonwebbert.com

Attorney for Plaintiff

Of Counsel:
Andrew Schmidt
Andrew Schmidt Law PLLC
97 India St.
Portland ME 04101
(207) 619-0320
andy@maineworkerjustice.com