“no disclosure was required”

Suffolk Superior Court | Civil Action No. 2684CV02864

Attached is Justice Is Exposure’s new **relationship matrix**. It brings together the documented relationships, official roles, disclosures, and chronology surrounding my civil action against my former law firm in Suffolk Superior Court.

Complex matters deserve clear presentation. Dates, documents, and professional relationships become easier to examine when placed alongside one another. **A carefully worded response may explain a position. It does not, by itself, resolve the questions raised by the record.**

I investigated DCF across Massachusetts government in connection with a new reform policy. That investigation led me to review my own records further. During a vulnerable period in my life, I did not know to look for these records or understand that I might need to. My position is that my attorneys should have explained material circumstances affecting the representation before I made consequential decisions.

The records include Cook and Kesten’s professional roles in the same Federal Bar Association chapter, Cook’s government positions, the case-specific government disclosures and screens, and the judicial nomination framework relevant to Judge Joshua Wall. The matrix distinguishes the documented roles from questions about personal involvement or influence that those records do not establish.

BHPK’s October 23 response states: **“no disclosure was required because there was no conflict of interest where neither was involved in the DCF Action.”** The quoted passage concerns the Cook–Donohue marriage. BHPK disputes my allegations and also maintains that Cook was screened from the underlying action. Readers can examine that position alongside the chronology and the questions concerning what my attorneys knew, what they disclosed, and what I understood before making consequential decisions.

A conclusion that disclosure was unnecessary does not answer what my attorneys knew, what they assessed, or what they explained to me.

Professional reputation is no substitute for a substantive answer. Where accounts differ, the appropriate response is scrutiny of the evidence, precise explanations, and correction of any demonstrated error. Justice Is Exposure welcomes factual corrections supported by records.

For me, this work concerns decisions that affected my life and the trust I placed in those advising me. Making the record understandable is part of pursuing accountability and creating the conditions in which healing becomes possible.

Read the chronology. Examine the sources. Consider what remains unanswered.

John Williams
Founder, Justice Is Exposure®

The relationship matrix identifies the public records, published reporting, and source documents supporting its entries. **The standard is evidence: examine the citations and assess BHPK’s position against the documented record.**

This publication is intended to facilitate public scrutiny of identified records and official actions. Massachusetts recognizes a fair report privilege for fair and accurate reporting of official actions and statements. See Howell v. Enterprise Publishing Co., LLC, 455 Mass. 641, 650-654, 661-663 (2010).

The people, the roles, the disclosures

John Williams v. BHPK | Suffolk Superior Court | Docket No. 2684CV02864 [5]

Family / government · Appointments / counsel · Professional roles

Laurie Greenwood

John Williams's foster mother [16,25]

March 18, 2011: Letter to **Secretary JudyAnn Bigby, Health and Human Services,** seeking help for her former foster child, **John Blouin.** DCF officials and Governor Patrick appear on the copy list. [16]

LETTER TO HHS SECRETARY • GOVERNOR LISTED ON CC

Governor Deval Patrick appears on the CC list. [16]
Kate Cook held a role in his office at the time. [2,17]

CC lists Governor Deval Patrick

Deval Patrick

Governor of Massachusetts. Nominated **Joshua Wall** on July 16, 2014. [1]

adviser

Kate R. Cook

2011-2013: Director of Policy & Cabinet Affairs, **Governor Patrick.**
2013: Appointed Patrick's Chief Legal Counsel; oversaw the judicial nomination process and interviewed candidates. [2,27]
2022: First Assistant AG.
2023: Governor **Healey**'s Chief of Staff. [4,17]

spouses

Thomas R. Donohue

Kate Cook's spouse; **BHPK** partner.
BHPK says he had no role in **John Williams**'s DCF case. [4,6]

partner

BHPK

John Williams's **former law firm.** Former counsel: **Erica Brody, Leonard Kesten, Richard Brody** and **Samuel Perkins.** [6]

2019

Sheriff's Office

Barnstable County
Dec. 30, 2019: BHPK requested Williams's consent for **Erica Brody + Leonard Kesten** to serve as Special Assistant AGs in **Huling, Pina** and **Smith.** [3]

partner / former counsel

partner / former counsel

nominated 2014

JUDICIAL NOMINATIONS
Cook: process oversight [2]
Wall: 2014 nominee [1]
Office's review role:
EO 500 §7.0 [28]

2010

served under

Joshua Wall

Superior Court judge. Signed settlement approval on September 28, 2023. [5]

Maura Healey

2022: Attorney General.
2023: Governor.
Forms document reassignment and screening of **Kate Cook** from **BHPK** matters, including this case. [4]

Federal Bar Association

MASSACHUSETTS / 2010
Cook: Awards Chair (with **Rocha**), Diversity Chair.
Kesten: Judicial Reception (with **Rooney**), executive board. [7]

2010

Leonard H. Kesten

John Williams's **former attorney.**
2010: Judicial Reception co-chair; same FBA chapter as **Cook.**
2019: Named with **Erica Brody** in consent request. [3,6,7,8]

2013: **Curran** interview [22]

Erica L. Brody

John Williams's former counsel. [6]
Rising Star: 2020-21; **Top Lawyers:** 2021-22; under-40 honors: 2021. [11]
2023: FBA Spalter award; Forbes Advisor list (per firm bio). [9,11]
MLW 2023 Lawyer of the Year; list published Feb. 9, 2024. [29]

approved settlement

screened case

represented Williams

Commonwealth / DCF

Government defendants in the **foster abuse case** and related settlement. [5,6]

party

Underlying case

Doe v. Blouin
Middlesex Superior Court
No. 1981CV03788. [4,5]

claimant

John Williams

Former client / claimant. Settlement approved September 28, 2023. [5]

DOCUMENTED DISCLOSURES AND RESPONSE

2019 consent request: Names Huling, Pina and Smith; contains no reference to the Cook-Donohue marriage. [3]
2022 / 2023 government forms: Identify the marriage, BHPK partnership and underlying case; describe recusal, screening and reassignment. [4]
BHPK's October 23, 2026 letter states: "no disclosure was required because there was no conflict of interest where neither was involved in the DCF Action." [6]

2017: initial approach

2018 referral / 2019 fee agreement

Laurence "Larry" Hardoon

BHPK founding partner. [12]
February 27, 2017: Nicole Silberman's email states that **Hardoon** reviewed **John Williams**'s website inquiry. The email says the firm could not get involved and refers Williams to **Carmen Durso.** [13]
Documented response: BHPK declined representation at that time. [13]

Kathy Curran

Kathy Curran → Leonard Kesten
March 29, 2013 • Ashland police report [22]

WCVB / Channel 5 News, Team 5 Investigates (at the time). [19,21]
2018: Contacted **Leonard Kesten** (Feb 20). **Williams** credited **Curran** for the introduction to **Erica Brody** (Aug 6); **Brody** confirmed records-only representation (Oct 15). [14]
2019: Brody sent the contingent-fee agreement Aug 15; receipt confirmed Aug 22. [5,15]
Outcome: BHPK formalized representation of John Williams. [5,15]

TIMELINE

2010-2014
Roles, letter + nomination
2010: Cook + Kesten, FBA.
2011: Greenwood letter; Patrick on CC. [16]
Cook: policy role in 2011; chief legal counsel in 2013.
Jul 16, 2014: Wall nominated. [1,2,7,17]

2017-2019
Decline, then engagement
2017: **Hardoon / BHPK** decline.
2018: **Curran** referral; records work.
2019: fee agreement. [13-15]

DEC 30, 2019
Client consent
Three sheriff's-office cases; no marriage reference. [3]

JAN 3, 2022
Cook's 2022 disclosure
Cook's spouse and underlying case identified. [4]

JAN 26, 2023
Cook's 2023 disclosure
Disclosure signed; spouse and **BHPK** matters identified; recusal described. [4]

FEB 1, 2023
Healey's determination
Healey signs reassignment determination; form states screening measures are in place. [4]

SEPTEMBER 2023
Award + court approval
Sep 22: FBA agenda schedules the Spalter award ceremony. [9,10]
Sep 28: Wall signs settlement approval. [5]

OCTOBER 23, 2026
BHPK response
BHPK's response to the demand states that "no disclosure was required" and cites Cook's screening. [6]

Arrows use the citations in their connected cards and identify documented roles or relationships. The plain blue line identifies an institutional nomination-process connection; the cited sources do not identify who reviewed Wall's individual candidacy. Affiliations and timing alone do not establish influence or participation in the 2023 national award selection.

SOURCE KEY

[1] State Library: Wall nomination • [2] Cook roles: Harvard (2013) / MLW (2014) • [3] Dec. 30, 2019 email (private) • [4] Government forms: 2022 / 2023 (public-record copies via StateReference)
[5] Court filing / approval order (supplied copies) • [6] BHPK response, Oct. 23, 2026 (private) • [7] FBA Dec. 2010 newsletter • [9] FBA recipient list • [10] FBA convention agenda • [11] Brody biography • [12] Hardoon biography
[13] Silberman email, Feb. 27, 2017 (private) • [14] Curran / Williams / Brody emails, 2018 (private) • [15] Brody emails, Aug. 2019 (private). Underlined = public web source; personal/private sources are identified separately.
[16] Greenwood letter, Mar. 18, 2011 (personally supplied copy; no public link) • [17] Cook: LinkedIn employment history (Jan. 2011-Jan. 2013) • [25] Williams's account supplied for this matrix (no public link)
[8] Kesten biography [27] State Ethics Commission: 2014 disclosure index [28] Executive Order 500 §7.0: Chief Legal Counsel's candidate-review role [29] MLW: 2023 Lawyers of the Year (list published Feb. 9, 2024)

REPORTING CONNECTIONS

Public reporting dates and documented professional contacts. Research added October 26, 2026.

Kevin Rothstein

Investigative producer, **WCVB / Channel 5**. [20,26]
2018: With **Kathy Curran**, investigated **John Williams**'s account. [19]
May 16, 2019: Curran + Rothstein report on **John Williams**'s foster-abuse account. [21]
2020: Emmy recipient credits for Foster Home of Horrors list **Rothstein** as investigative producer and **Curran** as investigative reporter. [20]

With Kathy Curran: reporting on Williams

2004: earlier DYS report

June 3, 2004: Incident at the Paul Leahy Center, Worcester, involving a 13-year-old boy, according to the report. [18]
July 31, 2004: Kevin Rothstein's Boston Herald article, "DYS worker kept job after alleged abuse." Located as a third-party reprint. [18]
John Williams confirms he was the 13-year-old child described in this report. [25] The article itself leaves the child unnamed. [18]

WCVB / BHPK contacts

Mar 29, 2013 report: Curran interviews **Kesten** on Ashland policing. [22]
2018: BC Law's account says **Curran** knew **Kesten** professionally and contacted him about helping **Williams**. [19]
WCVB report updated Aug 13, 2021: Curran covers **Kesten + Erica Brody**'s Holyoke Soldiers' Home lawsuit. [23] BHPK also publicizes the interview. [24]
These sources establish reporting contacts. They do not establish a financial arrangement, legal representation of WCVB, or editorial control by BHPK.

ADDED SOURCE LINKS

[18] 2004 Boston Herald article (reprint)

[19] BC Law: Then Came the Reckoning (2025)

[20] 2020 New England Emmy recipients, p. 3

[21] WCVB: May 16, 2019 report

[22] WCVB: March 29, 2013 report

[23] WCVB: August 13, 2021 report

[24] BHPK: Curran interview of Kesten / Brody

[26] Rothstein: verified Muck Rack profile

Identity source: John Williams's personal confirmation. [25] The 2004 report supplies the incident and publication details. [18] No additional financial or institutional connection was established in the sources reviewed. [19,22-24]

Kate R. Cook Government Disclosures

2022 AND 2023 | SOURCE DOCUMENT PACKET

Supporting records for the Justice Is Exposure relationship matrix concerning John Williams v. BHPK, Suffolk Superior Court, Civil Action No. 2684CV02864.

Document index

Record	Packet pages
2022 disclosure and determination Cook signature: January 3, 2022. Determination: January 3, 2022; Juliana deHaan Rice for Attorney General Maura Healey.	2-5
2023 disclosure and determination Cook signature: January 26, 2023. Determination: February 1, 2023; Governor Maura T. Healey.	6-9

Source and verification

Both records identify Cook’s spouse, Thomas R. Donohue, as a BHPK partner; list the underlying Middlesex Superior Court matter, No. 1981CV03788; and describe recusal, screening, and reassignment arrangements.

The original uploaded copies are reproduced in full after this index. Their page images, signatures, and blank source pages are preserved without alteration.

Public source database: StateReference Ethics Database - Kate Cook search. The database identifies its collection as documents obtained through public-records requests.

Original source filenames:
Cook_Kate_1.3.22_-_6.pdf
Cook,_Kate_2.1.23_-_6.pdf

DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST AND DETERMINATION BY APPOINTING AUTHORITY AS REQUIRED BY G. L. c. 268A, § 6

	STATE EMPLOYEE INFORMATION
Name:	Kate R. Cook
Title or Position:	First Assistant Attorney General
State Agency:	Attorney General's Office
Agency Address:	Office of Attorney General Maura Healey One Ashburton Place Boston, MA 02108
Office Phone:	
Office E-mail:	Kate.cook@mass.gov
	My duties require me to participate in a particular matter, and I may not participate because of a financial interest that I am disclosing here. I request a determination from my appointing authority about how I should proceed.
	PARTICULAR MATTER
Particular matter E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	Please describe the particular matter. The list of particular matters are matters handled by the law firm, Brody, Hardoon, Perkins & Kesten, LLP set forth below and the list is subject to periodic amendment. This disclosure is intended to include any future matter handled by Brody, Hardoon, Perkins & Kesten, LLP in which the AGO is involved. • *Doe et al v. Blouin et al*, Middlesex Superior Court, No. 1981CV03788 (Trial Division, AAG Abigail Fee) • *Tammy Cagle v. Thomas Estes*, USDC No. 18-10123-KAR (Trial Division, AAG Anne McLaughlin) • "Soldiers Home litigation"; *Kwesi Ablordeppey v. Bennett Walsh et al,* USDC No. 3:21-cv-11314 -MGM (Medicaid Fraud Division) • Commonwealth of Massachusetts *Ex Rel.* Mykel Powell, Commonwealth Second *Amendment, Inc. and Brent Carlton*; *Mykel Powell v. Holmes* (Stoughton) et al – USDC No. 1:18-cv-11336-FDS • *Pina v Barnstable Co. Sheriff's Office*, Barnstable Superior Court No. 1572CV00004 • *Weichel v. Braintree et al*, USDC 1:20-cv-11456-IT

Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	Please describe the task you are required to perform with respect to the particular matter. Generally, the First Assistant Attorney General oversees, participates in, and approves litigation strategy and decision-making for the office.
	FINANCIAL INTEREST IN THE PARTICULAR MATTER
Write an X by all that apply.	___ I have a financial interest in the matter. _X__ My immediate family member has a financial interest in the matter. ___ My business partner has a financial interest in the matter. ___ I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. ___ I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.
Financial interest in the matter	Please explain the financial interest and include a dollar amount if you know it. My spouse, Thomas R. Donohue, is a partner at the law firm Brody, Hardoon, Perkins & Kesten, LLP ("BHPK"). Accordingly, there are certain cases in which I have or may have a financial interest under G.L. c. 268A, § 6, by virtue of the fact that my spouse is a partner at BHPK. I will be recused and screened from participation in any matter being handled by BHPK or any of its employees or affiliated attorneys. In addition, the Attorney General's Office has put appropriate screening measures in place to memorialize my recusal and to prevent the sharing of any confidential information with me. Finally, I will be out of the reporting structure for all aspects of any of the matters handled by BHPK.
Employee signature:	***/s/ Kate R. Cook***
Date:	January 3, 2022

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	Maura Healey, Attorney General By, Juliana deHaan Rice
Title or Position:	General Counsel
Agency/Department:	Office of the Attorney General

Agency Address:	One Ashburton Place Boston, MA 02108
Office Phone:	617 963 2583
Office E-mail	Juliana.Rice@mass.gov
	DETERMINATION
Determination by appointing authority: **Write an X by your selection.**	As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee. __X_ I am assigning the particular matter to another employee, or ___ I am assuming responsibility for the particular matter, or ___ I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.
Appointing Authority signature:	
Date:	January 3, 2022
Comment:	Appropriate screening measures have been put in place internally to remove Kate from all participation in these matters.

Attach additional pages if necessary.

File copy with:

State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108

Form Revised February, 2012

DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST AND DETERMINATION BY APPOINTING AUTHORITY AS REQUIRED BY G. L. c. 268A, § 6

	STATE EMPLOYEE INFORMATION
Name:	Kate R. Cook
Title or Position:	Chief of Staff to Governor Maura T. Healey
State Agency:	Office of the Governor
Agency Address:	Office of Governor Maura T. Healey State House Room 360 Boston, MA 02133
Office Phone:	617-725-4005
Office E-mail:	Kate.R.Cook@mass.gov
	My duties may require me to participate in a particular matter, and I may not participate because of a financial interest that I am disclosing here. I request a determination from my appointing authority about how I should proceed.
	PARTICULAR MATTER
Particular matter E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	Please describe the particular matter. The list of particular matters are matters handled by the law firm, Brody, Hardoon, Perkins & Kesten, LLP set forth below and the list is subject to periodic amendment. This disclosure is intended to include any future matter handled by Brody, Hardoon, Perkins & Kesten, LLP in which the Commonwealth is involved. • Ablordeppey v. Bennett Walsh, et al [Soldier's Home Litigation] - USDC, Case No.: 21-cv-11314-MGM; First Circuit Court of Appeals, Case No.: 22-1833 • Doe, et al v Blouin and DCF, et al - Middlesex Superior Court, Case No.: 1981CV03788 • Downey v. Earl Johnson and Massachusetts Department of State Police - Suffolk Superior Court, Case No.: 18-01875C; Mass Appeals Court, Docket No.: 2022 • Fahey v. Town of Andover and Director of the Division of Unemployment Assistance - Lawrence District Court, Case No.: 2218CV000531 • Fraser v. MBTA, et al - Suffolk Superior Court, Case No.: 2084CV01554 • Frigon, et al v Riley, et al - Suffolk Superior Court, Case No.: 2284CV000344 • Harvey v. Edward J. Dolan, Commissioner of Probation and Office of the Commissioner of Probation - Suffolk Superior Court, Case No.: 2284-02806 • Hurley, et al v Robert Curtis, et al - USDC, Case No.: 22-cv-12167-PBS • Kennedy v. Commonwealth of MA, et al - USDC, Case No.: 22-cv-11152-NMG • Oversen v. University of Massachusetts Dartmouth and Haydee Martinez, MCAD, Docket No.: 22NEM02255 • Perez v. Wenham and Massachusetts Police Training Commission - MCAD, Docket No.: 20BEM02420 • Watson v. MBTA, et al - USDC, Case No.: 21-cv-11147 -FDS • Weichel v. Braintree, et al - USDC, Case No.: 20-cv-11456-IT

	Closing soon: • Commonwealth of Mass *Ex Rel.* Mykel Powell, et al v. Holmes (Stoughton), et al - USDC, Case No.: 18-11336 - FDS
Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	Please describe the task you are required to perform with respect to the particular matter. As a general matter, the Governor's Chief Legal Counsel is the person principally responsible for consulting with the Attorney General's Office and managing litigation strategy and decision-making in litigation against the Commonwealth and, where appropriate, approving settlements with litigants. Consequently, the Governor's Chief of Staff generally is not involved in decisions about litigation. Occasionally, however, there may be instances where the Governor's Chief Legal Counsel consults with or advises the Chief of Staff regarding significant litigation matters.
	FINANCIAL INTEREST IN THE PARTICULAR MATTER
Write an X by all that apply.	___ I have a financial interest in the matter. _X__ My immediate family member has a financial interest in the matter. ___ My business partner has a financial interest in the matter. ___ I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. ___ I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.
Financial interest in the matter	Please explain the financial interest and include a dollar amount if you know it. My spouse, Thomas R. Donohue, is a partner at the law firm Brody, Hardoon, Perkins & Kesten, LLP ("BHPK"). Accordingly, there are certain cases in which I have or may have a financial interest under G.L. c. 268A, § 6, by virtue of the fact that my spouse is a partner at BHPK. I will be recused and screened from discussing or otherwise participating in decision-making in any matter being handled by BHPK or any of its employees or affiliated attorneys. In addition, the Governor's Office has put appropriate screening measures in place to memorialize my recusal and to prevent the sharing of any confidential information with me. Finally, I will be out of the reporting structure for all aspects of any of the matters handled by BHPK.
Employee signature:	***/s/ Kate R. Cook***
Date:	January 26, 2023

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	Governor Maura T. Healey
Title or Position:	Governor
Agency/Department:	Office of the Governor
Agency Address:	Office of Governor Maura T. Healey State House Room 360 Boston, MA 02133
Office Phone:	617-725-4005
Office E-mail	maura.healey@mass.gov
	DETERMINATION
Determination by appointing authority: **Write an X by your selection.**	As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee. __X_ I am assigning the particular matter to another employee, or ___ I am assuming responsibility for the particular matter, or ___ I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.
Appointing Authority signature:	Maura T. Healey
Date:	February 7, 2023
Comment:	Appropriate screening measures have been put in place internally to remove Kate from all participation in these matters.

Attach additional pages if necessary.

File copy with:

State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108

Form Revised February, 2012