

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et
al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION OBJECTING MONITOR INVOICES

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (jointly, the “Commonwealth”, “Defendants” or “PRPB”), by and through the undersigned counsel, and respectfully state and pray the Court as follows:

I. INTRODUCTION

Although it is always a matter of great concern and a top government priority, it has become increasingly important for the Puerto Rico Police Bureau (the “PRPB”) to ensure that public funds are used properly, given the Island’s current financial woes and the significant public, legislative, and media scrutiny of the Commonwealth’s use of funds. The PRPB is therefore committed to, and expects nothing short of, **transparency** in the collection and disbursement of its allocated funds; even if they are, as in this case, deposited with the Court and not under the PRPB’s custody or control. It is **not only a constitutional requirement but in the People’s best interest** for the PRPB to rigorously oversee its expenditures to ensure that **public monies are used for public purposes**

only. Consequently, the PRPB submits that public funds should not be disbursed in this case without evidence showing that (1) public services were truly and effectively rendered by the Monitor, the members of his team and consultants in Reform Agreement related services; and (2) that the PRPB is being fairly charged for those services.

For the reasons discussed below, Defendants respectfully request that, prior to approving the April invoices, the Court order the Monitor and the members of his team and consultants, as applicable, to provide sufficient detail about the services that were rendered during the referenced month and afford the PRPB an opportunity to review the evidence to determine if the requested disbursement of public funds is fair and proper.

II. FACTUAL AND PROCEDURAL BACKGROUND

The Stipulation and Order for the Establishment of the TCA Office and the Payment of TCS Expenses (the “Stipulation and Order”), Dkt. 139 reads, in pertinent part, as follows:

Invoices or requests for payment submitted by the TCA **shall contain: a detailed statement of the services rendered during the reporting month;** a certification of the total spent by each employee, agent or contractor on Agreement-related activities; and receipts or other evidence incurred...

The parties shall review each invoice and request for payment submitted by the TCA’s Office. **Each party shall have the right to object to any expense that it considers unreasonable, excessive, or beyond the scope of the duties of the TCA, as set forth in the Agreement, by notifying the TCA Office in writing of the objection and the reasons thereof within seven (7) days after the TCA files the invoice or request for payment with the Court.** If neither party raises an objection with the TCA Office **within seven (7) after the TCA Office files the invoice or request for payment with the Court,** the Court shall pay the invoice or request. If a party raises an objection, the TCA shall have seven (7) days to respond to the objection and either withdraw, modify or renew the expense...” (Emphasis supplied).

See Stipulation and Order, Paragraphs 23 and 25.

A. Monitor Romero's April 2020 Invoice

Since his appointment as Interim Monitor, Mr. Romero provided itemized monthly invoices in which he detailed all tasks performed and expenses incurred during the billing period. Up until April, the monthly amount to be collected by the Monitor varied depending on the amount of work performed, as reflected in the detailed invoices that the Monitor used to issue (which are part of the record in this case). However, for the month of April, Mr. Romero submitted an invoice generally describing the activities performed during the month, and a "flat" fee of \$17,916.66, **with no itemization of the time spent in the different activities nor the total number hours incurred in such activities during April.** See Exhibit A. When questioned about this new manner of invoicing, Mr. Romero indicated that the Court had authorized him and/or encouraged him to invoice a flat fee and not include the hours. This global invoicing practice is not in compliance with the Stipulation and Order, was not discussed with the PRPB, and to the best of our knowledge, with the USDOJ prior to submitting the Monitor's invoices, and furthermore, does not offer the PRPB the necessary information to make a determination as to whether the "flat" fee being invoiced is **reasonable and not excessive.**

B. Other Invoices

The Commonwealth has reviewed the April 2020 invoices submitted by the entities and individuals hired by the Monitor to serve as staff/team members or independent consultants. While most of the invoices are itemized (provide details regarding daily tasks), there are many with vague entries while others describe work that may have been duplicative, redundant or unnecessary and/or were performed by

individuals that were not vetted to perform such services. Also, there have been hourly rate increases that were not notified to, nor agreed to by, the parties in the case.

As with respect to the Monitor, there are several Monitor team members and consultants also working in the case against the Commonwealth and the Division of Services for Adult Persons with Intellectual Disability (DSPDI, for its acronym in Spanish).¹ Vague, imprecise invoicing in either case makes it impossible for the PRPB to provide the oversight required to ensure that the Commonwealth's public funds are being adequately, fairly and transparently used, and that there is no double dipping. For these reasons, the PRPB submits the below objections to the Monitor and his team's invoices.

i. Constitutional Attorneys:

After the change in Monitor (from Arnaldo Claudio to John Romero), the Court informed at in-chambers meeting after the Status Conference held on June 25, 2019 that the "constitutional" attorneys (Alfredo Castellanos and Federico Hernández Denton) would remain in the case only on an "as needed basis" to provide legal advice to the Monitor and also to the Court. The hourly rate for Mr. Castellanos was \$125.00 and for Mr. Hernández Denton, \$150.00. Unbeknownst to the parties, the hourly rate was increased by \$50.00 per hour for Mr. Castellanos, and by \$25.00 for Mr. Hernández Denton, to \$175.00 per hour for each one. The PRPB was not notified of the intent to increase the rates and the reasons for such increase. The PRPB became aware of the increase upon review of the April 2020 invoices, and subsequent

¹ *United States of America v. Commonwealth of Puerto Rico, et al.*, Case 3:99-cv-01435 (GAG-MEL).

conversations with the Monitor who informed that the increases had been authorized by the Court.

The reasons for the increase need to be explained and justified. The PRPB has not received any information that would otherwise require and/or justify a \$50.00 / \$25.00 increase per hour for the constitutional attorneys. It is also important to point out that the services provided during the month of April by either counsel, as reflected in the invoices submitted, do not appear to be related to “constitutional” issues or even legal advice. This increase, in light of the current fiscal situation of the Commonwealth, and the apparent lack of a reasonable justification is unwarranted.²

As this Court is aware, both constitutional attorneys also provide services in the DSPDI case. Alfredo Castellanos serves as the Joint Compliance Coordinator (equivalent of a monitor) in the DSPDI case (both before the same Judge). This is particularly relevant because in this case, Mr. Castellanos submitted an invoice amounting to \$10,927.50 for 62.5 hours of services. See Exhibit B. The invoice contains numerous entries referencing “communications with”, “conference calls with”, “review of communications from” Javier González (Executive Director in the DSPDI case) and Mr. Hernández Denton (also a “constitutional” attorney in the DSPDI case); as well as communications with the Court that do not identify or describe the subject of the communication or activity. The failure to include a proper description of communications with individuals also involved in the DSPDI case (and, as matter of fact, dealing with COVID-19 protocols and related matters during April in both cases),

² We do not question here the specific rates authorized by the Court, but rather, the fact that there was an increase in the rates without even notice to the Parties nor an explanation of the reasons for the rate increases and their justification.

makes it extremely difficult to properly assess whether the services were **reasonable, not excessive, and within the scope of the Reform Agreement** in the PRPB case.

It bears emphasis that, in the DSPDI case, Mr. Castellanos is charging a fixed fee of \$12,725.00 for the month of April for entirely undisclosed services (see Exhibit C). The Court has allowed this because the JCC has purportedly been working so many hours in the case, that invoicing based on the “monthly fee” would likely prove less costly as it would presumably cover less than the hours actually worked. For this month, the JCC is requesting a disbursement of Commonwealth funds totaling **\$23,652.50** (between this case and the Police Reform case) and the Commonwealth has the right to receive a properly detailed invoice with adequate descriptions of the services provided in this case.

ii. Vague invoicing

As stated above, many of the invoices that do provide entries on work performed, are vague, full of generic phrases, and fail to offer sufficient information for the Commonwealth to properly assess them. An example of this is patent in the April 2020 invoice issued by the Monitor’s Administrative Director, Mr. Javier González, who also happens to be the JCC’s Executive Director in the DSPDI case.

Mr. González is not a monitor but rather an administrative manager. However, a review of his April 2020 invoice reflects that he appears to have been involved in little to no management activities and substantially in many other generic non-descriptive activities that cannot be properly assessed due to the vagueness of the descriptions. See Exhibit D. A review of the invoice reflects that Mr. González had, without being exhaustive, almost everyday:

- communications/conference calls with Monitor and/or share information with the Monitor (3/31, 4/1, 4/3, 4/5, 4/6, 4/8, 4/10, 4/14, 4/15, 4/16, 4/20, 4/21, 4/24, 4/27)
- communications with the Team members and/or staff and review (4/1, 4/7, 4/13, 4/15, 4/16)
- review of emails (4/1, 4/3, 4/7, 4/9, 4/10, 4/13, 4/14, 4/15, 4/20, 4/27)
- communications/conference calls with Counselor Castellanos (4/2, 4/3, 4/9, 4/13, 4/15, 4/21, 4/22)
- review of emails, information and documents sent by the USDOJ (4/1, 4/7)

However, there is absolutely no description on the object of those activities; again, very generic language without any kind of detail. It does appear however, judging from the numerous hours spent by Mr. González in the above listed activities that Mr. González has been involved in much more than administrative work. The fact that he appears to be doing substantial non-administrative work is particularly concerning because Mr. González was vetted by the parties to provide services as an office administrator and not as a monitor, nor to serve as subject matter expert. Based on the vague and cryptic entries in Mr. Gonzalez's invoices, it is not possible to surmise the nature of the work performed, nor how it relates to his administrative duties to the Monitor.

According to the invoice submitted by Mr. González, he worked **91.75** hours for a total of **\$7,798.75**. As previously mentioned, Mr. González is the Executive Director of the JCC's Office in the DSPDI case. Therefore, he is also invoicing for services in that

case.³ His April 2020 invoice, which also contains many similar vague entries, amounts to \$8,000.00 for 100 hours of work. See Exhibit E. In fact, the entry of 4/16 in the invoice submitted in this case, makes reference to “review of documents sent by the DSPDI”. This has to be corrected or clarified.

Therefore, Mr. González is invoicing **a total of \$15,798.75** (between both cases) to be paid from Commonwealth funds, for a total of **191.75 hours**. These are a lot of hours and hence, a significant amount of money coming out of Commonwealth funds.

There are many other examples of invoices with entries that do not provide the required detail to determine whether the invoiced amount is reasonable and not excessive. Invoices that are also lacking in details present an additional and not less important problem: it is difficult to determine if the service for which the PRPB is being invoiced is being provided by an individual that has the capacity, training or expertise to perform that particular service. For ease of review and analysis, a Table and Invoices with examples of some of the entries at issue are attached hereto as Exhibit H.

iii. Redundancy of Work

In order to show the redundancy in invoicing and the excessive and unnecessary use of resources, we have selected the COVID-19 Protocol as an example. See Table and Invoices, attached as Exhibit I. **The COVID-19 Protocol was totally and fully drafted by the PRPB within a very limited time frame (3 days) as ordered by the**

³³ A similar situation exists with the invoices of Federico Hernández Denton, who serves as a “constitutional” counsel in both this case and the DSPDI case. See invoices for fees amounting to \$22,531.25, attached as Exhibits F and G.

Court.⁴ However, as reflected in the Table (Exhibit I), the Monitor, his team members and consultants are invoicing an enormous number of hours in work related to the protocol (including time invested after the Protocol was approved for filing by the Monitor and the USDOJ on May 8th). This notwithstanding, the end result was the offering of just a few recommendations for the PRPB to accept at its discretion.

The Table includes a compilation of entries from 9 team members and/or consultants that **specifically** made reference to work related to the COVID-19 protocol (which means that there may be other applicable entries that, due to vagueness, could not be identified and included in the Table). It is hard to determine the total number hours spent by all 9 individuals in researching, reading discussing, conferring over the protocol (because many of the entries are block entries) but it is indeed clear the many unnecessary hours, including by some people with no expertise in COVID-19 (hence all the hours invested in research), went into that project. For example, Mr. David Levy, engaged by the Monitor to assist in the preparation of the CMRs is invoicing 3 hours for editing the COVID-19 protocol response. Mr. Scott Cragg, subject matter expert in IT, invoiced a significant number of hours (hard to determine the number due to the use of block entries) in COVID-19 protocol related matters. The constitutional attorneys also invested a lot of hours in “researching” and providing “attention to coronavirus related matters”, and Mr. González in reviewing the COVID-19 information sent by the team members.

iv. Other issues

⁴ On April 2, 2020, the Court ordered the PRPB to submit a COVID-19 protocol by no later than April 8th, at noon (Dkt. 1441). On that same date, the Monitor informed that the Judge had ordered that the PRPB submit a draft of the Protocol to the Monitor and the USDOJ by April 5th at noon.

In order for the PRPB to be able to duly assess the invoices for reasonableness, the same must include detailed descriptions of the services and of the hours per day invested in those services or activities. This applies to the invoices submitted by Mr. Donald Gosselin and by Mr. Scott Cragg, the latter of which includes simply a block entry of 19.75 hours. See Exhibits J and K. It is also important to make sure that the entries correspond to this case. For example, see entry of 4/3 of invoice submitted by Mr. Hernández Denton which reads as follows: “Reading of documents and emails exchanged by Management Team with lawyers in the states.” This entry needs to be either removed or clarified. See Exhibit F.

For all of the above, Defendants respectfully request that the Monitor submit an invoice detailing the services and expenses he incurred during the month; and that the team members and consultants revise and amend their April 2020 invoices to address the concerns of the PRPB. Moreover, the Court must afford the PRPB additional time to review and evaluate the revised invoices, prior to approval for payment.

III. ARGUMENT

Article VI, Section 9 of the Constitution of Puerto Rico states that “[p]ublic property and funds **shall only be disposed of for public purposes**, for the support and operation of state institutions, and pursuant to law.” P.R. Const. Art. VI § 9 (Emphasis added). As recognized by the Supreme Court of Puerto Rico, said provision imposes on the State (and consequently, public servants) the obligation to manage public funds with the highest fiduciary and ethical principles. *Jaap Corp. v. Depto. Estado*, 187 D.P.R. 730, 739 (2013); *see also Disaster Sols., LLC v. City of Santa Isabel, Puerto Rico*, No. CV 18-1898 (RAM), 2019 WL 6719866, at *2 (D.P.R. Dec. 10, 2019); *Cecort Realty Dev. Inc. v. Llompert-Zeno*,

100 F. Supp. 3d 145, 157 (D.P.R. 2015). Indeed, “the sane and correct administration of public funds is linked to the highest public interest and **all government organs are obligated to comply with the essence of the constitutional provisions requiring that public funds only be spent for legitimate public ends.**” *APA Int'l Film Distributors, Inc. v. Corporación de Puerto Rico para la Difusión Pública*, 394 F. Supp. 2d 443, 448–49 (D.P.R. 2005) (Emphasis added). Accordingly, public funds should not be disbursed unless there is certainty that those funds are to be used exclusively for legitimate public ends.

Furthermore, the Government Accounting Policy sets forth that “**the heads of dependencies [...] [shall] be in the first instance those responsible for the legality, correctness, exactitude, necessity and propriety of the fiscal operation needed to conduct their respective programs.**” 3 L.P.R.A. § 283a (f) (Official Translation) (Emphasis added). Thus, the Commissioner, as head of the PRPB, must ensure that public funds are adequately spent on compensations for legitimate public services rendered to the PRPB. Failure to comply with this provision may entail negative consequences for the Commissioner, who would, by omission, likely infringe the Puerto Rico Government Ethics Act of 2011: “[n]o public servant shall fail to comply with any of his/her duty as provided by law or regulation, if such action shall result in the loss of public funds or cause damages to public property.” 3 L.P.R.A. § 1857a (r) (Official Translation).⁵

Logic dictates that, in order to comply with the constitutional provision that mandates use of public funds for public purposes only, the PRPB must have detailed knowledge of the services that it pays for; otherwise, the PRPB has no way of monitoring its compliance with the Puerto Rico Constitution in this regard. Therefore, to ensure compliance with the

⁵ The original (Spanish) text reads: “Un servidor público no puede omitir el cumplimiento de un deber impuesto por ley o reglamento, si con ello ocasiona la pérdida de fondos públicos o produce daño a la propiedad pública”.

referenced constitutional and legal provisions, the Defendants must, at a bare minimum, have access to a detailed description of the daily professional services rendered by the Monitor, the members of his team and consultants, which are all paid from Commonwealth funds.

Act No. 237 of 2004⁶ requires professionals or consultants to submit an invoice, which “shall be specific, itemized and accompanied by a report detailing the services rendered and the hours worked in the rendering of said services. The invoice submitted shall include a certification indicating that the services were rendered and have not yet been paid for.” 3 L.P.R.A. § 8613 (j) (Official Translation). Said requirement allows the State to be certain of the types of services rendered by an individual and determine whether such services have benefitted the public system. While Defendants acknowledge that the Monitor is not a Government contractor, the rationale underlying the requirement of itemized invoices and detailed service reports is equally applicable: the State cannot legally disburse public funds without knowing what it is paying for. Indeed, such was the reasoning behind the Stipulation and Order that required “**detailed statement[s] of the services rendered.**” Also, as stated above, while the funds are deposited with the Court for payment of the Monitor’s expenses, it is no less true that the funds are Commonwealth funds.

The same transparency and accountability standards would apply to the Monitor’s invoices if the same were to be paid with federal government funds. It is well-settled that the proper use and disbursement of federal funds is a matter of great public concern. See, e.g., *Community-Service Broadcasting of Mid-America, Inc. v. Federal Communications Commission*, 593 F.2d 1102, 1119 (D.D.C. 1982) (recognizing that “oversight of the

⁶ Known as the “Act to establish uniform parameters in the procedures for contracting professional or consulting services for government agencies and entities in the Commonwealth of Puerto Rico.”

expenditure of federal funds is a substantial and important government objective”); *State of Oklahoma v. Schweiker*, 655 F.2d 401, 417 (D.D.C. 1981) (stating that “[t]he courts have long recognized the legitimacy of Congress’ interest in ensuring the proper use of federal funds”). Consequently, courts have held that federally funded programs are subject to strict transparency and accountability standards in making expenditures. See, e.g., *City of Newark, New Jersey v. U.S.D.O.L.*, 2 F.3d 31, 34 (3d Cir. 1993) (affirming the Secretary of Labor’s decision ordering the City to repay to the DOL misspent funds and holding that “both [the Comprehensive Employment and Training Act (“CETA”)] and the [Job Training Partnership Act (“JTPA”)] impose reporting requirements on grant recipients and auditing requirements on DOL in order to assure proper expenditure of federal funds [...] both CETA and the JTPA authorize the Secretary to recover misspent funds.” (internal citations omitted)); *Michigan Dept. of Education v. U.S. Dept. of Education*, 875 F.2d 1196, 1198 (1989) (“Section 3 of the [Rehabilitation] Act authorizes the Secretary to take whatever actions are necessary to ensure that funds are expended only for the purposes contemplated by the Act. Each grantee must keep records to account for its use of grant funds and to facilitate an effective audit. [...] The USDOE also has the power to audit state programs to ensure the proper use of federal funds”). As a Guardian for the compliance with applicable laws, this Court should be equally mindful in ensuring that public funds – albeit the Commonwealth’s funds in this case – are used reasonably and for public purposes.

The invoice submitted by the Monitor requires a flat fee and **zero** detail concerning the hours invested in the services rendered or work performed during the month of April. As stated above, even though all other April 2020 invoices provide some details about the services rendered, they are plagued by vagueness, seem to describe unnecessary or redundant work and/or reflect excessive billing. Said deficiencies

impede the PRPB, *and the Court*, from determining whether the public funds to be disbursed would constitute adequate compensation for legitimate public ends. **The total amount to be disbursed, once the invoices are approved, is significant: \$91,621.66.** See Exhibit L. Consequently, Defendants respectfully submit that the referenced invoices should not be approved at this juncture. The contrary would place the Commonwealth and, particularly, the PRPB, in a potential violation of the Constitution of Puerto Rico, which it is called to uphold, and of the Government accounting and ethics laws and policies to which it must adhere.

WHEREFORE, Defendants respectfully request that, prior to approving the invoices, the Court **(1)** order the Monitor, as well as its staff members and consultants, to (a) provide sufficient detail about the services that they rendered during the month of April; (b) provide an explanation and/or justification for the increase in rates of the constitutional attorneys; and (c) revise those invoices that have questionable entries; and **(2)** afford the PRPB an opportunity to review and determine if the requested disbursement of public funds is fair and proper.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 12th day of May, 2020.

By:

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s/ Arturo J. García-Solá

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EXHIBIT A

John J. Romero
2301 Pacific Ave
Costa Mesa, CA 92627

April 1 through April 30, 2020

INVOICE # 071
FEDERAL MONITOR
APRIL 2020 INVOICE

TOTAL DUE \$ 17,916.66

Duties and Responsibilities as Monitor

Generated, reviewed and responded to emails/texts (month of April) from the Parties, Monitor Team, Court and Special Master.

Conference calls with the Monitor Team members re: pending reports and reviews.

Conference calls with the Parties and Special Master

Reviewed data (Area Command FRB) relating to use of force for CMR-2 Report

Reviewed additional data received relating to CMR-2 (Use of Force).

Monitor administrative duties reviewing Team invoices, coordinating SME work assignments and conferring with Monitor's Office Administrative Director.

Reviewed Daily Briefing Reports from PRPB.

Reviewed PRPB's COVID-19 Protocol.

Reviewed PRPB's Strategic Plan for Deployment of National Guard.

Flat Rate Total Wages Due = \$17,916.66

I hereby certify that the amount billed in this invoice is true and correct in my capacity as Federal Monitor. I further certify that I have not received any income, compensation, or payment for services rendered under a regular employment or contractual relationship with the Commonwealth, or any of its departments, municipalities or agencies.



Date April 26, 2020



CASTELLANOS GROUP
P.S.C.

INVOICE

INVOICE NUMBER: 160

INVOICE DATE: APRIL 28, 2020

FROM: Castellanos Group P.S.C.
Condominio Madrid, 1760 Loíza Street, Suite 304 Invoice
00911 San Juan

TO: Police Reform, Case No: 3:12-cv-2039 (GAG)

00918 San Juan

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-01-20	Police Reform - Puerto Rico- Approved by the Court rate	Several comms. and conference calls with Monitor Romero; conference calls with Javier Gonzalez; comm. with the Court in compliance with standard TCA requirements; comms. with Hernandez Denton Esq.; attention of coronavirus issues and all related matters; review of comm. from Saucedo Esq; re; agenda for upcoming conference call; review of comm. from Monitor Romero; review of articles coronavirus; review of PRPB's response to document request	7.00	\$175.00	\$1,225.00
APR-02-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference calls with Javier Gonzalez; review of Order; comm. with the Court in compliance with standard TCA requirements; discussions with Hernandez Denton Esq.; attention of coronavirus matters; review of comm. from Al Young; comm. from Arturo Garcia Esq; review of several articles and information sent by Hernandez Denton Esq; review of comm. from Beatriz Annexy Esq.; third conference call with Monitor Romero; attention of coronavirus related matters	7.00	\$175.00	\$1,225.00
APR-03-20	Police Reform - Puerto Rico- Approved by the Court rate	Comms. with Monitor Romero; comms. with Javier Gonzalez; comm. with Hernandez Denton Esq.; review of info. regarding The National Guard and info. related to coronavirus matters	1.50	\$175.00	\$262.50
APR-04-20	Police Reform - Puerto Rico- Approved by the Court rate	Several comms. with Hernandez Denton Esq.; review of info. sent by Hernandez Denton Esq. relevant to coronavirus and Police; comm. with Javier Gonzalez; review of Protocol and info. received; comm. with the Court in compliance with standard TCA requirements; comm. with Monitor Romero; review of comm. from Al Young	2.50	\$175.00	\$437.50

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-05-20	Police Reform - Puerto Rico- Approved by the Court rate	Review of several comms.; review of comm. from Al Young; re; COVID Protocol; comm. with Hernandez Denton Esq.; discussion of several issues concerning coronavirus and Protocol; review of comm. from Monitor Romero	2.00	\$175.00	\$350.00
APR-06-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference call With Monitor Romero and team; discussion with Hernandez Denton Esq. and review comments on PRPB's Covid Protocol; review of several documents and information received, coronavirus and related matters	2.00	\$175.00	\$350.00
APR-07-20	Police Reform - Puerto Rico- Approved by the Court rate	Review of comm. from Saucedo Esq; comm. with Monitor Romero	0.50	\$175.00	\$87.50
APR-08-20	Police Reform - Puerto Rico- Approved by the Court rate	Comm. with Monitor Romero; review of documents; comms. with Hernandez Denton Esq.; review of comm. from Al Young; re; Sheriff Newsletter; review of comm. from Saucedo Esq.; re; Statistics; review of comm. from Arturo Garcia Esq; review of comm. from Monitor Romero, re; document request; review of filed PRPB'S Covid Protocol; review of several comms. received	2.00	\$175.00	\$350.00
APR-09-20	Police Reform - Puerto Rico- Approved by the Court rate	Review of comm. from Beatriz Annexy; review of comm. from Al Young re: Homeland Security Article; review of comm. from Monitor Romero; comm. with Javier Gonzalez; review of article sent by Hernandez Denton Esq.	2.00	\$175.00	\$350.00
APR-10-20	Police Reform - Puerto Rico- Approved by the Court rate	Review of comm. from Monitor Romero; re; data request; comm. with Monitor Romero	0.50	\$175.00	\$87.50
APR-13-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference calls with Monitor Romero and team; conference calls and coordination with Javier Gonzalez	2.00	\$175.00	\$350.00
APR-15-20	Police Reform - Puerto Rico- Approved by the Court rate	Comms. with Monitor Romero; comm. with Javier Gonzalez; comm. with Hernandez Denton Esq.	1.50	\$175.00	\$262.50
APR-16-20	Police Reform - Puerto Rico- Approved by the Court rate	Comm. with Javier Gonzalez; comm. with Monitor Romero	0.50	\$175.00	\$87.50
APR-17-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference calls with Monitor Romero and team; comm. with the Court in compliance with standard TCA requirements; comm. with Hernandez Denton Esq; attention of all matters related to National Guard activation and coronavirus matters	4.00	\$175.00	\$700.00

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-19-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference call with Monitor Romero; conference call with Hernandez Denton Esq.	0.50	\$175.00	\$87.50
APR-20-20	Police Reform - Puerto Rico- Approved by the Court rate	Communications with Hernandez Denton Esq.; comms. with Monitor Romero; comms. with The Court in compliance with standard TCA requirements	4.00	\$175.00	\$700.00
APR-21-20	Police Reform - Puerto Rico- Approved by the Court rate	Comm. With the Court in compliance with standard TCA requirements; comm. with Javier Gonzalez; comm. with Hernandez Denton Esq; re: discussions of several matters; review of comm. from Monitor Romero	2.00	\$175.00	\$350.00
APR-22-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference call with Monitor Romero; comm. with Javier Gonzalez; Privilege Memo to the Court	2.00	\$175.00	\$350.00
APR-23-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference call with Monitor Romero; conference call with Hernandez Denton Esq;; analysis of several matters and discussions regarding NG and related matters	4.00	\$175.00	\$700.00
APR-24-20	Police Reform - Puerto Rico- Approved by the Court rate	Communications with the Court in compliance with standard TCA requirements; several conference calls with Hernandez Denton Esq;; communications with Monitor Romero; review of comm. from Saucedo Esq;; re; agenda conference call; discussion and analysis of information and other Covid 19 related matters	8.00	\$175.00	\$1,400.00
APR-25-20	Police Reform - Puerto Rico- Approved by the Court rate	Comms. with Hernandez Denton Esq; review of information and articles	1.50	\$175.00	\$262.50
APR-27-20	Police Reform - Puerto Rico- Approved by the Court rate	Review of Court Order; communications with Monitor Romero; comms. with Hernandez Denton Esq.; review of comm. from Arturo Garcia Esq; review of comm. from Saucedo Esq.	3.00	\$175.00	\$525.00
APR-28-20	Police Reform - Puerto Rico- Approved by the Court rate	Conference call with Monitor Romero, the parties and Special Master; several communications	2.50	\$175.00	\$437.50
		Total hours for this invoice	62.50		
		Total amount of this invoice			\$10,937.50

EXHIBIT C

Castellanos Group P.S.C.
Condominio Madrid
1760 Calle Loiza
Suite 304
San Juan, Puerto Rico, 00911

The invoice for the services rendered by Castellanos Group P.S.C. during the month of April, 2020 totals the amount of \$12,725.

I hereby certify that the amount billed in this invoice is true and correct and respond to the number of hours work in my capacity as Joint Compliance Coordinator. I further certify that I have not received any income compensation or payment for services rendered under regular employment or contractual relationship with the Commonwealth of Puerto Rico, or any of its departments, municipalities or agencies.

S/Alfredo Castellanos Bayouth Esq.
Joint Compliance Coordinator,
Office of the JCCPR Corp.
Case No: 99-1435 (GAG-MEL)

THE & GROUP LLC.

Las Ramblas
71 Calle Montjuic
Guaynabo , PR 00969

EXHIBIT D

PHONE: Theandgroup.net

INVOICE

INVOICE NUMBER: 29
INVOICE DATE: APRIL 28, 2020

Federal Police Monitor

San Juan, PR

Invoice for Javier Gonzalez Professional Services as Administrative Director

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
MAR-31-20	Administrative Director	Review of emails, Share Information to the Monitor. Communications with the Monitor.	2.50	\$85.00	\$212.50
APR-01-20	Administrative Director	Communications with Monitor, Review of documents sent by PRPB, Review of email sent by USDOJ and team members. Communications with team members.	4.50	\$85.00	\$382.50
APR-02-20	Administrative Director	Conference Call with USDOJ and Commonwealth, Review of emails and information sent by team members. Communications with Counselor Castellanos. Communications with Monitor.	4.50	\$85.00	\$382.50
APR-03-20	Administrative Director	Communications with The Monitor, Review of emails, Review of information sent related to COVID-19 Protocols. Communications with counselor Castellanos.	4.75	\$85.00	\$403.75
APR-05-20	Administrative Director	Review of PRPB COVID-19 Protocol, Review of COVID-19 Information send by Team. Communications with the Monitor.	4.50	\$85.00	\$382.50
APR-06-20	Administrative Director	Review of COVID-19 Information send by Team, Staff Conference Call, Prepare Invoices Chart and Motion for the Court. Communications with the Monitor.	4.50	\$85.00	\$382.50
APR-07-20	Administrative Director	Review of Documents sent by USDOJ and Team Members Communications with the Monitor, Review of emails.	3.75	\$85.00	\$318.75
APR-08-20	Administrative Director	Review of Documents sent by Team Members, Review of documents sent by USDOJ, Review of CMR 2 Documents Request, Communications with the Monitor, Review of Emails	4.25	\$85.00	\$361.25
APR-09-20	Administrative Director	Review of COVID-19 Protocol Approved by the Court, Communications with the Monitor, Review of emails. Communications with counselor Castellanos.	3.75	\$85.00	\$318.75
APR-10-20	Administrative Director	Review of emails. CMR-2 Request of Information, Share information with the Monitor.	3.50	\$85.00	\$297.50

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-13-20	Administrative Director	Various communications with the Monitor, Work with Staff IDs, Conference Call with Staff, Review of emails. Communications with counselor Castellanos.	4.25	\$85.00	\$361.25
APR-14-20	Administrative Director	Communications with the Monitor, Review of Information sent by PRPB, Review of Emails, Sent information to the Monitor.	3.75	\$85.00	\$318.75
APR-15-20	Administrative Director	Review of information sent by Staff and PRPB, Share information with the Monitor, Review of emails, Various Communications with the Monitor. Communications with counselor Castellanos and Judge Denton.	4.00	\$85.00	\$340.00
APR-16-20	Administrative Director	Review of Tables sent by David, Review of Documents sent by DSPDI, Review of Staff Observations, Various communications with the Monitor, Review of Emails, Share information with the Monitor. Communications with staff.	4.75	\$85.00	\$403.75
APR-17-20	Administrative Director	Various communications with the Monitor, Review of documents sent by PRPB, Conference Call with PRPB and USDOJ, Sent information to the Monitor, Review of court order and emails.	4.00	\$85.00	\$340.00
APR-20-20	Administrative Director	Various communications with the Monitor, Work in the Virtual Monitoring Protocol, Review of emails.	4.25	\$85.00	\$361.25
APR-21-20	Administrative Director	Work with 2020-2021 Budget draft, Review of emails, Various communications with the Monitor. Communications with counselor Castellanos.	4.50	\$85.00	\$382.50
APR-22-20	Administrative Director	Various communications with the Monitor, Discussion of the Budget with the Monitor, Review of emails. Communications with counselor Castellanos.	3.75	\$85.00	\$318.75
APR-23-20	Administrative Director	Work with Virtual Monitoring Plan, Review of emails, Communications with the Monitor, Work with Website developers,	4.25	\$85.00	\$361.25
APR-24-20	Administrative Director	Communications with the Monitor, review of documents sent to the PRPB (Recommendations). Review of emails. Work with Virtual Monitoring Plan.	4.50	\$85.00	\$382.50
APR-27-20	Administrative Director	Work with Virtual Monitoring Plan, Communications with staff members, Communications with the Monitor Review of Emails.	4.50	\$85.00	\$382.50
APR-28-20	Administrative Director	Communications with the Monitor, work on Virtual Monitoring Plan, Conference Call with USDOJ and PRPB, Review of Emails.	4.75	\$85.00	\$403.75

INVOICE NUMBER: 29

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-28-20	Administrative Director	I hereby certify that the amount billed in this Invoice is true and correct and respond to the number of hours work in my capacity as Member of the Federal Monitor Team. I further certify that I have not received any income, compensation or payment for services rendered under a regular employment or contractual relationship with the Commonwealth, or any of its departments, municipalities or agencies.	0.00	\$85.00	\$0.00
		Total amount of this invoice			\$7,798.75

MESSAGE 

Javier Gonzalez

THE & GROUP LLC.

Las Ramblas
71 Calle Montjuic
Guaynabo , PR 00969

EXHIBIT E

PHONE: Theandgroup.net

INVOICE

INVOICE NUMBER: 30
INVOICE DATE: APRIL 28, 2020

JCCPR CORP.
1760 Calle Loíza
San Juan, PR 00911

Invoice for Javier B Gonzalez Professional Services as Executive Director

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
MAR-31-20	Executive Director	Various communications with Monitor and Staff, Communications to DSPDI. (Participant Transition) Communication with Provider, Review of emails, Administrative work (Invoices).	7.00	\$80.00	\$560.00
APR-01-20	Executive Director	Various Conference calls with Monitor, Conference call with Chief legal counsel, Conference call with UMass CDDER, Communication with DSPDI , Review of emails and communications.	5.75	\$80.00	\$460.00
APR-02-20	Executive Director	Conference Call with Legal Team, Conference Call and Various Communications with the Monitor, Request of information to the DSPDI, Review of Emails.	5.00	\$80.00	\$400.00
APR-03-20	Executive Director	Work on Continuous Request of Information Document. Conference Call With Monitor, Conference Call with Legal Team, Review of Emails, Review of information sent by DSPDI, Various communications with the Monitor.	5.25	\$80.00	\$420.00
APR-06-20	Executive Director	Staff Conference Call, Communications with Monitor Castellanos, Communications with DSPDI, Conference Call with Chief Counselor, Dr Rodriguez and Monitor. Review of Emails. Prepare Invoices Motion to the Court.	5.50	\$80.00	\$440.00
APR-07-20	Executive Director	Communications with Chief legal Counsel, Conference Call with Monitor and Counselor Carrión, Communications with Monitor, Review of documents sent by DSPDI and Staff. Review of emails.	5.50	\$80.00	\$440.00
APR-08-20	Executive Director	Staff Conference Call, Conference Call with UMASS CDDER, Conference Call with Monitor and Counselor Carrión, Conference Call with Chief Counselor, Communications with the Monitor, Review of Communication S sent by Team Members, Review of information sent by DSPDI and Emails. Review of Request for information.	6.25	\$80.00	\$500.00

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-09-20	Executive Director	Various Conference Calls With Legal Team, Various Communications and Conference Calls with Monitor, Conference Call with DSPDI and Commonwealth Counselors. Review of Information sent by DSPDI, Review of documents sent by JCCPR Staff members. Review of emails.	7.00	\$80.00	\$560.00
APR-10-20	Executive Director	Review of documents sent by DSPDI, Communications and Conference Calls with JCCPR legal team, Review of emails. (Court Order and Motion) communications with The Monitor, Conference call with Commonwealth Counselor, Review of documents sent by Staff.	7.00	\$80.00	\$560.00
APR-11-20	Executive Director	Conference call with Staff, Conference Call with DSPDI Legal Representatives, USDOJ and Secretary of Health	1.00	\$80.00	\$80.00
APR-13-20	Executive Director	Conference call with staff, Conference call with Monitor and Legal Team, Review of documents sent by DSPDI, Review of Motion and documents filed by Commonwealth, Various communications with staff and Monitor, Work with Staff IDs, Review emails.	5.50	\$80.00	\$440.00
APR-14-20	Executive Director	Various communications with Monitor and Staff, Work with staff IDs, Various Conference Calls with Monitor and Legal Advisors. Conference Call With UMass, Review of Documents sent by DSPD and Staff. Review on Emails, Various Communications with the Monitor.	6.00	\$80.00	\$480.00
APR-15-20	Executive Director	Review of Documents sent by JCC Advisors, Conference Call with Monitor and Legal Advisors, Conference Call with UMass, Communications with staff, Communications with the Monitor, Review of JCC Official Communication (Isolation Recommendations) Review of Emails.	5.75	\$80.00	\$460.00
APR-16-20	Executive Director	Review of Documents sent by legal counsels, review of documents sent by DSPDI Legal Counsels, Various communications with the Monitor. Work with JCCPR Payment. Communications with Staff.	5.50	\$80.00	\$440.00
APR-17-20	Executive Director	Various Conference Calls with legal counselors, Various Conference Calls with the Monitor, Review of documents sent by JCC, Review of documents sent by DSPDI, Conference call with DSPDI Counsel and Compliance Officer, Review of emails. Communications with staff.	6.00	\$80.00	\$480.00
APR-20-20	Executive Director	Communication with Provider, Communication with Chief Legal Counselor, Communication with Dr. Rodriguez, Work with Virtual Monitoring Protocol, Various Communications with the Monitor, Review of emails.	5.00	\$80.00	\$400.00

INVOICE NUMBER: 30

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-21-20	Executive Director	Conference call with Monitor, Chief Legal Counsel and Dr. Rodriguez, Various communications with the Monitor, Communications with DSPDI, Review of emails sent by DSPDI, Review of emails sent by staff,	5.00	\$80.00	\$400.00
APR-22-20	Executive Director	Conference call with staff, Work on Monthly meeting with DSPDI agenda, Various communications with the Monitor and Staff, Conference Call with DSPDI, Review of documents sent by DSPDI, Review of documents sent by staff. Review of emails.	6.00	\$80.00	\$480.00
APR-23-20	Executive Director	Review of documents sent by DSPDI, Communication with DSPDI, Various communications and Conference Call with the Monitor, Communications with Chief Legal Counsel, Review of emails.	0.00	\$80.00	\$0.00
APR-24-20	Executive Director	Conference call with staff, Review of documents sent by DSPDI, Review of documents sent by JCC staff, communications with the Monitor, communications with Chief Legal Counsel, review of emails.	0.00	\$80.00	\$0.00
APR-27-20	Executive Director	Visit of DSPDI Proposed Isolation Home, Visit of Various Community Homes in Vega Alta and Bayamón, Review of emails sent by DSPDI, Review of emails. Communications with the Monitor.	0.00	\$80.00	\$0.00
APR-28-20	Executive Director	Conference call with staff, Communications with the Monitor, review of emails. Review of documents sent by DSPDI.	0.00	\$80.00	\$0.00
		Total amount of this invoice			\$8,000.00



Federico Hernández D...

INVOICE

f.hernandezdenton@gmail.com

Invoice#: 18

Invoice Date: 04/28/2020

From **To: Federal Monitor**

Calle Independencia # 564
 Hato Rey, PR, 00918

Date	Worked	Rate	Amount
04/28/2020 Communications with Alex del Carmen, Monitor Romero and Castellanos; review of agenda for calls on Tuesday sent by Saucedo and call on National Guard sent by Alex del Carmen	1h 45m	\$175.00/h	\$306.25
04/27/2020 Reading of statistics sent by Reform Office and emails from DOJ and McV and conference call with Alfredo Castellanos and emails from Alex del Carmen and Arturo García regarding order issued by Judge Gelpí concerning use of National Guard	1h 00m	\$175.00/h	\$175.00
04/27/2020 Reading of Order of Judge Gelpí about use of National Guard for law enforcement activity under the Agreement and exchanges of email with Monitor and Attorney Castellanos and Special Master Alex del Carmen	1h 30m	\$175.00/h	\$262.50
04/27/2020 Additional research of use of National Guard for law enforcement activities in past emergencies in PR and communications Castellanos	1h 00m	\$175.00/h	\$175.00
04/26/2020 Research of use of National Guard to conduct law enforcement activities in emergencies declared as well as other uses of National Guard	4h 00m	\$175.00/h	\$700.00
04/25/2020 Communications with Alfredo Castellanos and review of documents sent by Al Young	1h 30m	\$175.00/h	\$262.50

04/24/2020	3h 30m	\$175.00/h	\$612.50
Reading of emails from SM with recommendations about protocol and conference calls with John Romero and Alfredo Castellanos			
04/24/2020	3h 30m	\$175.00/h	\$612.50
Reading and analysis of Strategic Plan for the Use of National Guard sent bu Arturo García and conference call with Alfredo Castellanos and research of Agreement of DOJ and PR Government as well as information about use of NG by other states in this pandemia. Conference call with John Romero			
04/23/2020	4h 00m	\$175.00/h	\$700.00
Conference call with Monitor Romero; confcall with Castellanos; review amd analysis of documents concerning use of National Guard for law enforcement			
04/21/2020	2h 00m	\$175.00/h	\$350.00
Reading of email sent by Monitor Romero to Arturo García and exchange of communications with Judge Gelpí and Attorney Castellanos			
04/20/2020	3h 30m	\$175.00/h	\$612.50
Reading of Arturo Garcia's reply to Monitor's email about National Guard use and exchange with Alfredo Castellano, Alex del Carmen and Monitor concerning his response to García's email			
04/19/2020	0h 45m	\$175.00/h	\$131.25
Conference calls with Monitor Romero and conference call with Castellanos			
04/17/2020	3h 30m	\$175.00/h	\$612.50
Conference call of Federal Monitor with DOJ and PRDOJ and Arturo García about the incorporation of the National Guard and applicability of the Reform in case the National Cuard is incorporated to assist PRPB and in what form will they be incorporated and reading of order of the Court issued today			
04/16/2020	0h 15m	\$175.00/h	\$43.75
Communications with Monitor			
04/15/2020	1h 00m	\$175.00/h	\$175.00
Communicatios with Monitor and Castellanos and Javier González			
04/13/2020	1h 00m	\$175.00/h	\$175.00
Weekly Conference call			
04/13/2020	0h 30m	\$175.00/h	\$87.50
Review of deaft prepared by John Romero about use of National Guard			

04/10/2020	0h 30m	\$175.00/h	\$87.50
Review of communications from Monitor and Castellanos about data request for PRPB			
04/09/2020	2h 00m	\$175.00/h	\$350.00
Reading of communications from Beatriz Annexy; review of information sent by Al Young and communications with Alfredo Castellanos			
04/08/2020	2h 00m	\$175.00/h	\$350.00
Reading of COVID-19 Protocol Filed in Court by PRPB and communicatios with Monitor and Castellanos			
04/06/2020	1h 00m	\$175.00/h	\$175.00
Reading of comments sent by Alex del Carmen to Arturo García and additional review of sections of protocol sent by PRPB to analyze the changes suggested in each section of protocol by Team to the document			
04/06/2020	1h 00m	\$175.00/h	\$175.00
Reading of newspapers articles related to problems in precincts of PRPB with absences related to COVID-19 and preparation of emails to Monitor Romero and Alfredo Castellanos and conference calls with Castellanos about developing problems			
04/06/2020	1h 00m	\$175.00/h	\$175.00
Weekly Teleconference call of Monitor's Team			
04/06/2020	2h 30m	\$175.00/h	\$437.50
Reading and review of Draft of Protocol of PRPB sent by Arturo García and preparation of comments and recommendations for the Monitor's team. Preparation for the teleconference with the team			
04/05/2020	2h 00m	\$175.00/h	\$350.00
Reading of statistics sent by Coronel Vega and initial reading and review of protocol submitted by Attorney Arturo García and Office of Reform entitled Guías de Seguridad para los Miembros del Negociado de la Policía de PR y Protocolo Operacional de Manejo de COVID-19			
04/04/2020	1h 00m	\$175.00/h	\$175.00
Review of all the statistics sent by Coronel Vega during the week and exchange of news articles about the PRPB with Judge Gelpí and Monitor Romero and Attorney Castellanos			
04/04/2020	3h 00m	\$175.00/h	\$525.00
Reading of protocols of police departments sent by Al Young and the order of PRPB for handling of infectious diseases and research about protocols used by Judicial Branch for handling of cases of employees with infectious diseases and communications with Alfredo Castellanos			

04/03/2020 Reading of documents and emails exchanged by Management Team with lawyers in the states	1h 00m	\$175.00/h	\$175.00
04/02/2020 Conference call with Monitor Romero and Alfredo Castellanos concerning the call with the parties and the order of the Court concerning schedule for the approval and submission of protocol of PRPD during pandemia	1h 00m	\$175.00/h	\$175.00
04/02/2020 Weekly Conference call of Monitor with parties	1h 30m	\$175.00/h	\$262.50
04/02/2020 Reading and review of report sent by PRPB in response to questions sent by Monitor and conference calls with Attorney Castellanos and text communications with Monitor and Judge Gelpí and research of articles anout COBID-19 inaw enforcement agencies and comunicatios sent to Judge Gelpí, Castellanos and Monitor	3h 30m	\$175.00/h	\$612.50
04/01/2020 Communications and conference call with Monitor, review of agenda proposed by DOJ for conference call, research of coronavirus problems of law enforcement entities in states, and confrence calls with Castellanos	4h 00m	\$175.00/h	\$700.00
03/30/2020 Teleconference with Monitor Romero, Alfredo Castellanos and Core Team	0h 30m	\$175.00/h	\$87.50

Terms & Note:

Thanks for your business.

Sub Total:	\$10,806.25
Overtime Pay:	\$0.00
Discount:	\$0.00
Tax(0.00%):	\$0.00
Total Amount:	\$10,806.25
Paid:	\$0.00
Balance Due:	\$10,806.25



Federico Hernández D...

INVOICE

f.hernandezdenton@gmail.com

Invoice#: 19

Invoice Date: 04/28/2020

From

To: JCC

Calle Independencia # 564

Hato Rey, PR, 00918

Date	Worked	Rate	Amount
04/28/2020 Communications with Monitor Castellanos and Javier González regarding DSPDI COVID-19 protocol; reading of information sent by Margarita Mercado	2h 00m	\$175.00/h	\$350.00
04/27/2020 Reading of emails regarding request for information and conference calls with Monitor Castellanos; reading of information sent by Laura Palacios to Margarita Mercado	1h 30m	\$175.00/h	\$262.50
04/23/2020 Review of emails exchanged with DSPDI and Attorney Mercado	0h 30m	\$175.00/h	\$87.50
04/22/2020 Review of agenda and review of file in preparation of conference call and conference call of JCC Team with Arturo García and DSPDI team	3h 00m	\$175.00/h	\$525.00
04/22/2020 Reading and analysis of recommendations of Emily Bauer and review of protocol submitted by DSPDI to isolate participants with COVID -19 symptoms and communications with Monitor Castellanos	3h 00m	\$175.00/h	\$525.00
04/21/2020 Conference calls with JCC and Attorney Mercado regarding motion submitted by DSPDI	2h 00m	\$175.00/h	\$350.00
04/21/2020 Reading of motion of reconsideration filed Arturo García and Lizie Portela on behalf of DSPDI and conference call with JCC Castellanos	1h 00m	\$175.00/h	\$175.00

04/21/2020 Exchange of emails and conference calls with JCC regarding COVID-19 case of one participant in one biological home.	3h 00m	\$175.00/h	\$525.00
04/20/2020 Reading of Burns Order by Judge Gelpí and communications with Monitor Castellanos	2h 00m	\$175.00/h	\$350.00
04/19/2020 Communications with Monitor Castellanos about the impact of coronavirus to participants in several states	1h 00m	\$175.00/h	\$175.00
04/17/2020 Reading and exchange of information regarding implementation of protocol adopted yesterday by Court and exchange of information with Judge Gelpí of order issued about use of virtual technologies for monitoring and request of information about participant NGM # 992	4h 00m	\$175.00/h	\$700.00
04/16/2020 Reading of Protocol with comments prepared by DSPDI and submitted by Arturo Garcia, conference call with JCC Castellanos and reading of order of Court and exchange of emails between JCC and Arturo García	1h 00m	\$175.00/h	\$175.00
04/16/2020 Reading of Arturo García reply to JCC and conference call with JCC Castellanos. Review of DOJ recommendations to JCC Suggestions and conference call with Monitor	2h 00m	\$175.00/h	\$350.00
04/16/2020 Review of spanish translation of JCC suggestions and recommendations and of DOJ recommendations and communications with Monitor Castellanos	3h 00m	\$175.00/h	\$525.00
04/15/2020 Conference call with JCC Castellanos and Margarita Mercado about draft of JCC's suggestions and recommendations and review of changes proposed; reading of UMASS recommendations for proposed isolation plan for participants	4h 00m	\$175.00/h	\$700.00
04/15/2020 Reading and review of JCC's suggestions and recommendations on the COVID-19 isolation and treatment plans proposed by DSPDI and call with JCC Castellanos	1h 00m	\$175.00/h	\$175.00
04/15/2020 Reading of recommendations of UMASS and emails exchanged with Health Department and conference call with JCC Team	2h 00m	\$175.00/h	\$350.00

04/14/2020	4h 00m	\$175.00/h	\$700.00
Reading and analysis of draft of protocol submitted by Health Department and communications and conference calls with Monitor Castellanos and Attorney Margarita Mercado and reading of request for information from UMass; reading of analysis and recommendations of Richard Farrano			
04/13/2020	2h 00m	\$175.00/h	\$350.00
Reading of amended request for information to be sent to DSPDI and communications with Monitor Castellanos			
04/11/2020	0h 45m	\$175.00/h	\$131.25
Conference calls with JCC and counsels for JCC after conference call with The Secretary of Health and communication with Judge informing him of call and review of motion drafted by Margarita Mercado to submit to Court			
04/11/2020	0h 15m	\$175.00/h	\$43.75
Conference call of JCC with parties including the Secretary of Health			
04/10/2020	3h 00m	\$175.00/h	\$525.00
Reading of communications between JCC and DSPDI and emails from members of team and draft of motions			
04/09/2020	3h 00m	\$175.00/h	\$525.00
Review of article published in NY Times, draft of motion to be filed in Court and of request for production of information of participant AMV #349 who is under quarantine and conference calls with JCC			
04/08/2020	4h 00m	\$175.00/h	\$700.00
Review of changes proposed by Attorneys Margarita Mercado and Diana Alcaraz and incorporation of changes into protocol for DSPDI and other documents circulated regarding protocol; follow up of participant MSR 923			
04/08/2020	3h 00m	\$175.00/h	\$525.00
Reading of email sent by Attorney Palacios regarding patient at the Instituto Psicopedagógico and sending recommendations and communications with Monitor Castellanos			
04/07/2020	2h 00m	\$175.00/h	\$350.00
Reading of reply from DSPDI to request for information and communications with Monitor Castellanos			
04/06/2020	1h 00m	\$175.00/h	\$175.00
Reading of emails from Monitor Castellanos to Pedro Robles of DSPDI requesting information and communications with Monitor Castellanos			

04/05/2020 Revision of urgent request to DSPDI for information and communications with Monitor Castellanos	2h 00m	\$175.00/h	\$350.00
04/03/2020 Communications with Monitot Castellanos and Javier González regarding use of CTS Centers in protocol being prepared by DSPDI	2h 00m	\$175.00/h	\$350.00
04/02/2020 Research of newspapers of impact of coronavirus in homes and communications with Monitor Castellanos and of request of information sent by Monitor to DSPDI	2h 00m	\$175.00/h	\$350.00
03/31/2020 Reading of Law permitting use of Telemedicines and communications with Monitor Castellanos and Margarita Mercado about incorporating telemedicine in DSPDI Peotocol	2h 00m	\$175.00/h	\$350.00

Terms & Note:

Thanks for your business.

Sub Total:	\$11,725.00
Overtime Pay:	\$0.00
Discount:	\$0.00
Tax(0.00%):	\$0.00
Total Amount:	\$11,725.00
Paid:	\$0.00
Balance Due:	\$11,725.00

VAGUE ENTRIES

EXHIBIT H

DATE	BILLER	ENTRY NARRATIVE	HOURS	RATE	AMOUNT CHARGED
UNDATED	AL YOUNGS	Reviewed and responded to emails and conference calls for the month of April from members of the Monitor Team and the Parties reference methodology and questions concerning requests by the Monitor Team.	10	\$150	\$1,500
UNDATED	DONALD GOSSELIN	Multiple teleconferences, emails and texts with Team Members & all Parties to the Agreement	UNSPECIFIED	\$150	BILLED \$10,125 FOR A TOTAL OF 67.5 HOURS (DID NOT SPECIFY AMOUNT CHARGED PER TASK)
UNDATED	JOHN ROMERO	Generated, reviewed and responded to emails/texts (month of April) from the Parties, Monitor Team, Court and Special Master. Conference calls with the Monitor Team members re: pending reports and reviews. Conference calls with the Parties and Special Master	UNSPECIFIED	UNSPECIFIED	BILLED FLAT RATE OF \$17,916.66
UNDATED	DR. DAVID LEVY	Calls with John Romero	1.5	\$150	\$225
UNDATED	DR. DAVID LEVY	Skype calls with team	2.5	\$150	\$375
3/30/20	FEDERICO HERNANDEZ DENTON	Teleconference with Monitor Romero, Alfredo Castellanos and Core Team	0.5	\$175	\$87.50
3/31/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of emails, Share Information to the Monitor. Communications with the Monitor.	2.5	\$85	\$212.50

VAGUE ENTRIES

EXHIBIT H

4/1/20	JAVIER GONZALEZ (THE & GROUP LLC)	Communications with Monitor, Review of documents sent by PRPB, Review of email sent by USDOJ and team members. Communications with team members.	4.5	\$85	\$382.50
4/2/20	JAVIER GONZALEZ (THE & GROUP LLC)	Conference Call with USDOJ and Commonwealth, Review of emails and information sent by team members. Communications with Counselor Castellanos. Communications with Monitor.	4.5	\$85	\$382.50
4/3/20	FEDERICO HERNANDEZ DENTON	Reading of documents and emails exchanged by Management Team with lawyers in the states	1	\$175	\$175.00
4/7/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of Documents sent by USDOJ and Team Members Communications with the Monitor, Review of emails.	3.75	\$85	\$318.75
4/7/20	CASTELLANOS GROUP P.S.C.	Review of comm. from Saucedo Esq; comm. with Monitor Romero	0.5	\$175	\$87.50
4/8/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of Documents sent by Team Members, Review of documents sent by USDOJ, Review of CMR 2 Documents Request, Communications with the Monitor, Review of Emails	4.25	\$85	\$361.25
4/10/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of emails. CMR-2 Request of Information, Share information with the Monitor.	3.5	\$85	\$297.50
4/10/20	FEDERICO HERNANDEZ DENTON	Review of communications from Monitor and Castellanos about data request for PRPB	0.5	\$175	\$87.50
4/10/20	CASTELLANOS GROUP P.S.C.	Review of comm. from Monitor Romero; re; data request; comm. with Monitor Romero	0.5	\$175	\$87.50
4/13/20	JAVIER GONZALEZ (THE & GROUP LLC)	Various communications with the Monitor, Work with Staff IDs, Conference Call with Staff, Review of emails. Communications with counselor Castellanos.	4.25	\$85	\$361.25

VAGUE ENTRIES

EXHIBIT H

4/13/20	CASTELLANOS GROUP P.S.C.	Conference calls with Monitor Romero and team; conference calls and coordination with Javier Gonzalez	2	\$175	\$350.00
4/14/20	JAVIER GONZALEZ (THE & GROUP LLC)	Communications with the Monitor, Review of Information sent by PRPB, Review of Emails, Sent information to the Monitor.	3.75	\$85	\$318.75
4/15/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of information sent by Staff and PRPB, Share information with the Monitor, Review of emails, Various Communications with the Monitor. Communications with counselor Castellanos and Judge Denton.	4	\$85	\$340.00
4/15/20	FEDERICO HERNANDEZ DENTON	Communications with Monitor and Castellanos and Javier González	1	\$175	\$175.00
4/15/20	CASTELLANOS GROUP P.S.C.	Comms. with Monitor Romero; comm. with Javier Gonzalez; comm. with Hernandez Denton Esq.	1.5	\$175	\$262.50
4/16/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of Tables sent by David, Review of Documents sent by DSPDI, Review of Staff Observations, Various communications with the Monitor, Review of Emails, Share information with the Monitor. Communications with staff.	4.75	\$85	\$403.75
4/16/20	FEDERICO HERNANDEZ DENTON	Communications with Monitor	0.25	\$175	\$43.75
4/16/20	CASTELLANOS GROUP P.S.C.	Comm. with Javier Gonzalez; comm. with Monitor Romero	0.5	\$175	\$87.50
4/19/20	FEDERICO HERNANDEZ DENTON	Conference calls with Monitor Romero and conference call with Castellanos	0.75	\$175	\$131.25
4/19/20	CASTELLANOS GROUP P.S.C.	Conference call with Monitor Romero; conference call with Hernandez Denton Esq.	0.5	\$175	\$87.50

VAGUE ENTRIES

EXHIBIT H

4/20/20	CASTELLANOS GROUP P.S.C.	Communications with Hernandez Denton Esq.; comms. with Monitor Romero; comms. with The Court in compliance with standard TCA requirements	4	\$175	\$700.00
4/21/20	CASTELLANOS GROUP P.S.C.	Comm. with the Court in compliance with standard TCA requirements; comm. with Javier Gonzalez; comm. with Hernandez Denton Esq; re: discussions of several matters; review of comm. from Monitor Romero	2	\$175	\$350.00
4/25/20	FEDERICO HERNANDEZ DENTON	Communications with Alfredo Castellanos and review of documents sent by Al Young	1.5	\$175	\$262.50
4/25/20	CASTELLANOS GROUP P.S.C.	Comms. with Hernandez Denton Esq; review of information and articles	1.5	\$175	\$262.50
4/27/20	CASTELLANOS GROUP P.S.C.	Review of Court Order; communications with Monitor Romero; comms. with Hernandez Denton Esq.; review of comm. from Arturo Garcia Esq; review of comm. from Saucedo Esq.	3	\$175	\$525.00
4/28/20	CASTELLANOS GROUP P.S.C.	Conference call with Monitor Romero, the parties and Special Master; several communications	2.5	\$175	\$437.50

REDUNDANT ENTRIES – COVID-19 PROTOCOL

EXHIBIT I

DATE	BILLER	ENTRY NARRATIVE	HOURS	RATE	AMOUNT CHARGED
UNDATED	AL YOUNGS	Reviewed information and Strategic Work Plan implemented by the PRPB to address the Covid-19 Emergency.	2	\$150	\$300
UNDATED	AL YOUNGS	Researched, reviewed, and provided a document with various law enforcement policies toward the Covid-19 Emergency. These documents included inquiries from PERF, IACP, RAND, and ASIS and were shared with the Parties.	7	\$150	\$1,050
UNDATED	AL YOUNGS	Contacted domestic violence (DV) subject matter experts and provided copies of the Investigative Handbook and the Victim Services Handbook referenced DV, and also provided information on several Covid-19 Emergency related DV webinars to USDOJ.	3	\$150	\$450
UNDATED	AL YOUNGS	Reviewed three law enforcement webinars concerning Covid-19 Emergency.	5	\$150	\$750
UNDATED	JOHN ROMERO	Reviewed PRPB's COVID-19 Protocol. Reviewed PRPB's Strategic Plan for Deployment of National Guard.	UNSPECIFIED	UNSPECIFIED	BILLED FLAT RATE OF \$17,916.66
UNDATED	SCOTT CRAGG (CRYSTAL REEF LLC)	Communications & Coordination - telcons and emails to/from CT, PRPB, USDOJ. Subj's- monitoring expectations, techniques, performance, COVID	8.25	\$150	\$1,237.50
UNDATED	SCOTT CRAGG (CRYSTAL REEF LLC)	PRPB provided Document Review; COVID-19 Draft Protocol , April delivered documents, Use of Force, National Guard Strategy, EIS proposal, IT documents and data	19.75	\$150	\$2,962.50
UNDATED	SCOTT CRAGG (CRYSTAL REEF LLC)	COVID-19 Reference Materials for PRPB, recommendations and monitor materials, references, feedback , National Guard recommendations, protective equipment, court orders	6.75	\$150	\$1,012.50
UNDATED	SCOTT CRAGG (CRYSTAL REEF LLC)	Monitoring Teleconferences including COVID: DOJ, McVeigh, Monitors	3.5	\$150	\$525.00
UNDATED	SCOTT CRAGG (CRYSTAL REEF LLC)	DoJ provided document review; COVID Policy , Court Documents, may day protest information, national guard recommendations	3.25	\$150	\$487.50

REDUNDANT ENTRIES – COVID-19 PROTOCOL

EXHIBIT I

	LLC)				
UNDATED	DR. DAVID LEVY	Edited COVID-19 protocol response	3	\$150	\$450.00
4/1/20	FEDERICO HERNANDEZ DENTON	Communications and conference call with Monitor, review of agenda proposed by DOJ for conference call, research of coronavirus problems of law enforcement entities in states , and conference calls with Castellanos	4	\$175	\$700.00
4/1/20	CASTELLANOS GROUP P.S.C.	Several comms. and conference calls with Monitor Romero; conference calls with Javier Gonzalez; comm. with the Court in compliance with standard TCA requirements; comms. with Hernandez Denton Esq.; attention of coronavirus issues and all related matters ; review of comm. from Saucedo Esq; re; agenda for upcoming conference call; review of comm. from Monitor Romero; review of articles coronavirus ; review of PRPB's response to document request	7	\$175	\$1,225.00
4/2/2020; 4/6/20	RAFAEL RUIZ	Work on Monitor's recommendations for PRPB Covid-19 Protocol , review, teleconferences	9.5	\$150	\$1,425.00
4/2/20	FEDERICO HERNANDEZ DENTON	Reading and review of report sent by PRPB in response to questions sent by Monitor and conference calls with Attorney Castellanos and text communications with Monitor and Judge Gelpí and research of articles about COVID-19 in law enforcement agencies and communications sent to Judge Gelpí, Castellanos and Monitor	3.5	\$175	\$612.50
4/2/20	CASTELLANOS GROUP P.S.C.	Conference calls with Javier Gonzalez; review of Order; comm. with the Court in compliance with standard TCA requirements; discussions with Hernandez Denton Esq.; attention of coronavirus matters ; review of comm. from Al Young; comm. from Arturo Garcia Esq; review of several articles and information sent by Hernandez Denton Esq; review of comm. from Beatriz Annexy Esq.; third conference call with Monitor Romero; attention of coronavirus related matters	7	\$175	\$1,225.00

REDUNDANT ENTRIES – COVID-19 PROTOCOL

EXHIBIT I

4/3/20	JAVIER GONZALEZ (THE & GROUP LLC)	Communications with the Monitor, review of emails, review of information sent related to COVID-19 Protocols. Communications with counselor Castellanos.	4.75	\$85	\$403.75
4/3/20	CASTELLANOS GROUP P.S.C.	Comms. with Monitor Romero; comms. with Javier Gonzalez; comm. with Hernandez Denton Esq.; review of info. regarding the National Guard and info. related to coronavirus matters	1.5	\$175	\$262.50
4/4/20	FEDERICO HERNANDEZ DENTON	Reading of protocols of police departments sent by Al Young and the order of PRPB for handling of infectious diseases and research about protocols used by Judicial Branch for handling of cases of employees with infectious diseases and communications with Alfredo Castellanos	3	\$175	\$525.00
4/4/20	CASTELLANOS GROUP P.S.C.	Several comms. with Hernandez Denton Esq.; review of info. sent by Hernandez Denton Esq. relevant to coronavirus and Police; comm. with Javier Gonzalez; review of Protocol and info. received; comm. with the Court in compliance with standard TCA requirements; comm. with Monitor Romero; review of comm. from Al Young	2.5	\$175	\$437.50
4/5/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of PRPB COVID-19 Protocol, Review of COVID-19 Information sent by Team. Communications with the Monitor.	4.5	\$85	\$382.50
4/5/20	FEDERICO HERNANDEZ DENTON	Reading of statistics sent by Coronel Vega and initial reading and review of protocol submitted by Attorney Arturo García and Office of Reform entitled Guías de Seguridad para los Miembros del Negociado de la Policía de PR y Protocolo Operacional de Manejo de COVID-19	2	\$175	\$350.00
4/5/20	CASTELLANOS GROUP P.S.C.	Review of several comms.; review of comm. from Al Young; re; COVID Protocol; comm. with Hernandez Denton Esq.; discussion of several issues concerning coronavirus and Protocol; review of comm. from Monitor Romero	2	\$175	\$350.00
4/6/20	JAVIER GONZALEZ	Review of COVID-19 Information send by Team, Staff Conference Call, Prepare Invoices Chart and Motion for the Court.	4.5	\$85	\$382.50

REDUNDANT ENTRIES – COVID-19 PROTOCOL

EXHIBIT I

	(THE & GROUP LLC)	Communications with the Monitor.			
4/6/20	FEDERICO HERNANDEZ DENTON	Reading and review of Draft of Protocol of PRPB sent by Arturo García and preparation of comments and recommendations for the Monitor's team. Preparation for the teleconference with the team	2.5	\$175	\$437.50
4/6/20	FEDERICO HERNANDEZ DENTON	Reading of newspapers articles related to problems in precincts of PRPB with absences related to COVID-19 and preparation of emails to Monitor Romero and Alfredo Castellanos and conference calls with Castellanos about developing problems	1	\$175	\$175.00
4/6/20	CASTELLANOS GROUP P.S.C.	Conference call with Monitor Romero and team; discussion with Hernandez Denton Esq. and review comments on PRPB's COVID Protocol; review of several documents and information received, coronavirus and related matters	2	\$175	\$350.00
4/8/20	FEDERICO HERNANDEZ DENTON	Reading of COVID-19 Protocol Filed in Court by PRPB and communications with Monitor and Castellanos	2	\$175	\$350.00
4/8/20	CASTELLANOS GROUP P.S.C.	Comm. with Monitor Romero; review of documents; comms. with Hernandez Denton Esq.; review of comm. from Al Young; re; Sheriff Newsletter; review of comm. from Saucedo Esq.; re; Statistics; review of comm. from Arturo Garcia Esq; review of comm. from Monitor Romero, re; document request; review of filed PRPB'S COVID Protocol ; review of several comms. received	2	\$175	\$350.00
4/9/20	JAVIER GONZALEZ (THE & GROUP LLC)	Review of COVID-19 Protocol Approved by the Court, Communications with the Monitor, Review of emails. Communications with counselor Castellanos.	3.75	\$85	\$318.75
4/17/20	CASTELLANOS GROUP P.S.C.	Conference calls with Monitor Romero and team; comm. with the Court in compliance with standard TCA requirements; comm. with Hernandez Denton Esq; attention of all matters related to National Guard activation and coronavirus matters	4	\$175	\$700.00

REDUNDANT ENTRIES – COVID-19 PROTOCOL

EXHIBIT I

4/24/20	CASTELLANOS GROUP P.S.C.	Communications with the Court in compliance with standard TCA requirements; several conference calls with Hernandez Denton Esq; communications with Monitor Romero; review of comm. from Saucedo Esq. re; agenda conference call; discussion and analysis of information and other Covid 19 related matters	8	\$175	\$1,400.00
UNDATED	DEL CARMEN CONSULTING LLC	Reviewed and provided feedback relating to PRPB COVID-19 Protocol while reviewing narrative by USDOJ and Monitor's Office.	8.5	\$150	\$1,275.00
UNDATED	DEL CARMEN CONSULTING LLC	Performed research on COVID-19 and National Guard Related Matters.	10	\$150	\$1,500.00

Al Youngs
5552 West Lakeridge Road
Lakewood, CO 80227

April 1 - April 30, 2020

Invoice No. 11

Member of Federal Monitor Team

Reviewed and responded to emails and conference calls for the month of April from members of the Monitor Team and the Parties reference methodology and questions concerning requests by the Monitor Team.	10 hours
Developed additional questions for supervision and management in English and Spanish for future site visits.	3 hours
Reviewed publication by PERF reference Refining the Role of Less-Lethal Technologies Critical Thinking, Communications, and Tactics That Are Essential in Defusing Critical Incidents. Shared information with the Monitor Team,	3 hours
Reviewed information and Strategic Work Plan implemented by the PRPB to address the Covid-19 Emergency.	2 hours
Researched, reviewed, and provided information toward the protocol in the event of the utilization of the National Guard by the PRPB. Reviewed Federal and state quarantine and isolation authority and the Posse Comitatus Act and related matters concerning the use of the military to execute civilian law.	5 hours
Researched, reviewed, and provided a document with various law enforcement policies toward the Covid-19 Emergency. These documents included inquiries from PERF, IACP, RAND, and ASIS and were shared with the Parties.	7 hours
Reviewed V2A Staffing Study and researched the transfer of PRPB personnel based upon this Staffing Study. Reviewed response of PRPB concerning their ideas and comments towards this Staffing Study. Further reviewed EIS Database dictionary.	7 hours
Contacted domestic violence (DV) subject matter experts and provided copies of the Investigative Handbook and the Victim Services Handbook referenced DV, and also provided information on several Covid-19 Emergency related DV webinars to USDOJ.	3 hours
Reviewed webinar concerning the use of handcuffs and the new NIJ recommendations.	2 hours

Reviewed three law enforcement webinars concerning Covid-19 Emergency.	5 hours
Researched and reviewed the Michigan Military Police Study and Military Reciprocity Handbook.	3 hours
Reviewed documentation that all PRPB supervisors are trained and certified.	3 hours
Reviewed EIS Department General Order and Registration of Administrative Complaints General Order.	5 hours
Reviewed documentation concerning Supervisory training for Sergeants, Lieutenants, and Captains. Reviewed documentation concerning requirements for Supervisors that are consistent with generally-accepted policing practices.	3 hours
Reviewed additional List of Supervisors sent by PRPB	2 hours

TOTAL HOURS: 63

Billable Hours: 60 Hours and 40 Minutes at a Rate of \$150.00 Per Hour = \$9,100.00

Pro Bono Hours: 2 Hours and 20 Minutes

Total: \$9,100.00

TOTAL WAGES AND EXPENSE REIMBURSEMENT \$9,100.00

I hereby certify that the amount billed in this invoice is true and correct and responds to the number of hours worked in my capacity as a Member of the Federal Monitor Team. I further certify that I have not received any income, compensation, or payment for services rendered under a regular employment or contractual relationship with the Commonwealth, or any of its departments, municipalities or agencies.

Alan C Young
Signature

4/30/2020
Date

Dr. David Levy
714 Wilkes Street
Alexandria, VA. 22314

March 25-April 24, 2020

INVOICE # 004
April 2020 INVOICE

TOTAL DUE \$9,100.00 USD

The following is a detailed statement of the hours worked.

25 March to 24 APR 2020 (worked performed in CONUS)

- Final Revisions to CMR-1 (March hours did not suffice to cover all the work needed to finalize CMR-1; 15 hours from April were used in advance in March to cover this work)
- Edited COVID-19 protocol response (3 hours)
- Develop work packets in relation to evaluation methods and sampling strategy (31 hours)
 - Associated all paragraphs and data sources with appropriate worksheets
 - Developed work packet label system to consolidate all related methodology tables, worksheets, assessment tables, and data requests (pending PRPB supplying document form numbers).
 - Assigned all data sources a unique ID number to incorporate all related data sources into appropriate work packet
 - Deconflicted evaluation schedule – ensuring that all paragraphs and all indicators that are scheduled to be evaluated together are scheduled together. Awaiting approval from parties on schedule revisions to proceed with organizing all assessment materials into work packets according revised schedule.
- Conference calls and coordination with Monitoring Team (6 hours)
 - 4/08 call with Al Youngs re CMR-2 data sources (1 hour)
 - Calls with John Romero (1.5 hours)
 - Skype calls with team (2.5 hours)
 - 04/17 call with PRPB re: sampling strategy (1 hour)
- Implement the sampling strategy for key data sources for CMR-2 (7 hours)
 - Assisted John Romero, Al Youngs, and Rafael Ruiz in drawing samples for CMR-2 assessments


62 hours total @ \$150/hour = \$9300

TOTAL FEE: 62.00 Hours x \$150/hour = \$9,300USD

FEE WAIVED (PR): 1.33 Hours x \$150/hour = (\$200.00 USD)

Total Fees and Expense Reimbursement Due = \$9,100.00

I hereby certify that the amount billed in this invoice is true and correct and responds to the number of hours worked in my capacity as an assistant to the Federal Monitor. I further certify that I have not received any income, compensation, or payment for services rendered under a regular employment or contractual relationship with the Commonwealth of Puerto Rico, or any of its departments, municipalities or agencies.



Signature

April 25, 2020

Date

Remittance Information

Capital One Bank

Rafael E. Ruiz
 12 Crestshire Dr.
 Lawrence, MA 01843

INVOICE #


DATE:

Billed to: Federal Monitor, PRPB/USDOJ Agreement For service:
 670 Ponce De Leon Ave. Suite 207
 San Juan, PR 00907

<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
April 2 and 6- Work on Monitor's recommendations for PRPB Covid-19 Protocol, review, teleconferences	9.5	\$150/hr.	\$1,425.00
April 6 and 8- Work on recommendations for PRPB National Guard Deployment Strategy	7	\$150/hr.	\$1,050.00
April 9- Prep new CMR-02 Data Request; work on CMR-02 data received	7	\$150/hr.	\$1,050.00
April 13- phone calls, emails, Team teleconference calls; organize docs for draft report	4	\$150/hr.	\$600.00
April 15- Data request for PRPB; Telconf with PRPB	3.5	\$150/hr.	\$525.00
April 17- Additional data from PRPB; Telconf with PRPB	2.5	\$150/hr.	\$375.00
April 18- CMR-02 data read/analysis	6	\$150/hr.	\$900.00
April 19- CMR-02 data read/analysis	6	\$150/hr.	\$900.00
April 20, 21, 22- Work on data for CMR-02	7	\$150/hr.	\$1,050.00
April 23-24- Work on PRPB Nat'l Guard Strategy	4	\$150/hr.	\$600.00
April 28- Telconf with Parties, CMR-02	5.5	\$150/hr.	\$825.00
April 29- Work on CMR-02	3	\$150/hr.	\$450.00

TOTAL \$9,750.00

TOTAL BILLED (billable) \$9,100.00



 Rafael E. Ruiz

Date: April 30, 2020

Del Carmen Consulting, LLC
3122 Westwood Drive
Arlington, Texas 76012

April 1 through April 26, 2020

INVOICE # SM2020-1
SPECIAL MASTER
APRIL 2020 INVOICE

TOTAL DUE \$ 9,000.00

Tasks Completed

Hours	Description	Total
18.5	Drafted, reviewed and responded to emails and all other documents/communication with respective parties and the Court.	\$2,775
3.5	Conference calls with the Monitoring Team members.	\$525
5.5	Conference calls with the Parties and Monitor.	\$825
8.5	Reviewed and provided feedback relating to PRPB COVID-19 Protocol while reviewing narrative by USDOJ and Monitor's Office.	\$1,275
4.5	Reviewed Daily Briefing Reports from PRPB.	\$675
10	Performed research on COVID-19 and National Guard Related Matters.	\$1,500
9.5	Reviewed PRPB's Strategic Plan for Deployment of National Guard and provided feedback.	\$1,425
		\$9,000

Total Wages Due = \$9,000.00

I hereby certify that the amount billed in this invoice is true and correct in my capacity as Special Master. I further certify that I have not received any income, compensation, or payment for services rendered under a regular employment or contractual relationship with the Commonwealth, or any of its departments, municipalities or agencies.



Dr. Alejandro del Carmen



4/26/20

Donald S. Gosselin, Esq.
83 Bow Ridge Rd.
Lynn, MA. 01904

March 28, 2020 to April 26, 2020

INVOICE # 1132
APR 2020 INVOICE

TOTAL DUE \$9,100.00 USD

The following is a detailed statement of the hours worked.

All work performed in CONUS

28 MAR 2020 to 26 APR 2020

- Multiple teleconferences, emails and texts with Team Members & all Parties to the Agreement
- Review all data resulting from Request for Production of Documents (“RPD”)
- Prepare second request for production of documents
- Analyze all notes and comments made for 39 SARP files reviewed in-person in San Juan
- Prepare written draft report on SARP findings for CMR-2
- Review data matrix and data selection for CMR-2 categories other than SARP-Internal Affairs complaints
- Review contract, multiple emails, correspondence and coordination with Korber Inc.
- Review PRPB notional plan for PRNG deployment and make suggestions
- Review responses to second request for production of documents for CMR-2
- Teleconference with PRPB, legal counsel and Monitors concerning RPD2

67.5 hours total @ \$150 = \$10,200.00

TOTAL FEE:	67.50 Hours x \$150 = \$10,125.00 USD
FEE WAIVED (PR):	6.83 Hours x \$150 = \$(1,025.00 USD)

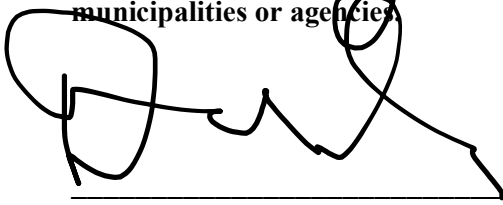
Net US FEE PAYABLE \$ 9,100.00

Total Net FEE PAYABLE \$ 9,100.00

Total Fees and Expense Reimbursement Due = \$9,100.00

I hereby certify that the amount billed in this invoice is true and correct and responds to the number of hours worked in my capacity as a Federal Monitor. I further certify that I have not received any income, compensation, or payment for services rendered under a regular employment

or contractual relationship with the Commonwealth of Puerto Rico, or any of its departments, municipalities or agencies.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Signature

26 April 2020

Date

Remittance Information

Citizens Bank of Boston

EXHIBIT K

INVOICE 0062 FOR PROFESSIONAL SERVICES; MARCH 24 – APRIL 30, 2020
RELEASED BY SCOTT CRAGG, CRYSTAL REEF LLC, 13932 SOUTH SPRINGS DR, CLIFTON VA 20124

TO: **Federal Monitor**
Puerto Rico Police Department Consent Decree

The invoice for professional services rendered by Crystal Reef LLC (Monitoring Core Team) during the months of March/April 2020 is detailed as follows:

Task Performed	US Hours	Billable Amount
Communications & Coordination - telcons and emails to/from CT, PRPB, USDOJ. Subj's- monitoring expectations, techniques, performance, COVID	8.25	\$1,237.50
Community engagement website - requirements and design	0.75	\$112.50
Develop data requests including CMR-2, monitoring methodology	4.50	\$675.00
Assessment taxonomy, structure alignment with Decree and Reporting	0.75	\$112.50
PRPB provided Document Review; COVID-19 Draft Protocol, April delivered documents, Use of Force, National Guard Strategy, EIS proposal, IT documents and data	19.75	\$2,962.50
COVID-19 Reference Materials for PRPB, recommendations and monitor materials, references, feedback, National Guard recommendations, protective equipment, court orders	6.75	\$1,012.50
Monitoring Teleconferences including COVID: DOJ, McVeigh, Monitors	3.50	\$525.00
6-month Report - Re-write to final	4.25	\$637.50
DoJ provided document Review; COVID Policy, Court Documents, may day protest information, national guard recommendations	3.25	\$487.50
Net Hours US	51.75	\$7,762.50
TOTAL OF BILLABLE HOURS IN US @ \$150/hr.		\$7,762.50

INVOICE PRESENTED BY:


 Scott Cragg, Monitoring Core Team

EXHIBIT L

OFFICE OF THE FPMPR LLC.
 B 5 Calle Tabonuco Suite 205
 Guaynabo, Puerto Rico 00968

May 7, 2020

Professional services rendered by the members of the Office of the FPMPR LLC. for April, 2020:

NAME	AMOUNT	MONTH
John Romero	\$17,916.66	APRIL 2020
Castellanos Group P.S.C.	\$10,937.50	APRIL 2020
The & Group LLC (Javier González)	\$7,798.75	APRIL 2020
Dr. David Levy	\$9,100.00	APRIL 2020
Donald S. Gosselin	\$9,100.00	APRIL 2020
Al Youngs	\$9,100.00	APRIL 2020
Rafael E. Ruiz	\$9,100.00	APRIL 2020
Scott Cragg	\$7,762.50	APRIL 2020
Federico Hernández Denton	\$10,806.25	APRIL 2020
TOTAL:	\$91,621.66	APRIL 2020