

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.
DEPARTMENT

SUPERIOR COURT

NO. 2282-CR-00117

_____)
COMMONWEALTH OF)
MASSACHUSETTS,)
Plaintiff)
)
V.)
)
KAREN READ,)
Defendant)
_____)

AFFIDAVIT OF PRIVATE INVESTIGATOR PAUL MACKOWSKI IN SUPPORT OF MOTION FOR ORDER PURSUANT TO MASS. R. CRIM. P. 17 DIRECTED TO THE CANTON DEPARTMENT OF PUBLIC WORKS AND THE CANTON TOWN CLERK

I, Paul Mackowski, under oath, do depose and state as follows:

1. I am a private investigator and the President and Founder of The M Group LLC, a privately owned and licensed detective agency operating in the State of Massachusetts. I was retained by Werksman Jackson & Quinn LLP to provide investigative services in connection with the criminal case currently pending in Norfolk Superior Court involving Karen Read.

2. I submit this affidavit on personal knowledge in support of Defendant's Motion for Order Pursuant to Mass. R. Crim. P. 17 Directed to the Canton Department of Public Works and the Canton Town Clerk.

3. On February 14, 2022, I traveled to Canton Town Hall to obtain information about any snowplows that were dispatched to the area of 34 Fairview Road on January 29, 2022. I was directed to speak with Michael Trotta, DPW Superintendent, but he was unavailable. I left my card with a member of his staff. He suggested that I speak with Bill Walsh, the Highway

Department supervisor, and told me that Mr. Walsh and his crew had just left for the day after snowplowing all night. He gave me Mr. Walsh's cell phone number and suggested I call him the following day.

4. On February 15, 2022, I spoke with Mr. Walsh. Mr. Walsh told me that Brian Loughran was responsible for plowing the area that includes 34 Fairview Road during the January 29 blizzard and gave me Mr. Loughran's contact information.

5. On February 15, 2022, I met with Brian "Lucky" Loughran. Mr. Loughran indicated that he has plowed the area that includes 34 Fairview Road for three years. On the morning of January 29, 2022, he arrived at the DPW yard at 2:00 a.m. and left the yard alone in the snowplow truck by 2:15 a.m. He was driving a six-wheel international dump truck with a nine-foot plow on it. Mr. Loughran said that his route took him down Fairview Road with #34 on his left as he plowed toward Cedarcrest Road. Mr. Loughran indicated that he made two or three passes down Fairview Road during his shift. He said he had good visibility from the truck cab because it was not snowing very heavily when he first started his shift. I asked him whether he believed he would have seen a body on the lawn of 34 Fairview Road, if one was there, from the view of his cab while snowplowing. Without equivocation, Mr. Loughran said that he definitely would have seen a body in the front yard of the house. Mr. Loughran further indicated he always looks in front of him and from side to side. He reiterated that if there was a body there, there is no doubt he would have seen it.

6. I then asked Mr. Loughran if he recalled anything about 34 Fairview Road from that early morning shift. He told me that sometime around 3:30 a.m. or 4:00 a.m., when he was plowing Cedarcrest Road, he looked toward Fairview Road and saw a small SUV parked in front of 34 Fairview Road. Mr. Loughran indicated the vehicle's lights were off and he could not see if

anyone was inside it. I asked Mr. Loughran where in front of the house the vehicle was parked and he replied, "Exactly where the body was found." Mr. Loughran described the vehicle as a Ford Edge or something similar. We walked out to the parking lot to see if there were any vehicles that looked similar to the one Mr. Loughran saw that morning. He immediately pointed to a Ford Edge in the parking lot and said, "It looked like that." I asked Mr. Loughran what stood out about the vehicle, and he told me that it was snowing, and he saw no moving or parked vehicles on the roads on his prior passes by the road on his route during the blizzard and was surprised to see one parked there at the time. Mr. Loughran further indicated that he did not plow Fairview Road again until after 6:30 a.m.

SIGNED and SWORN to under the pains and penalties of perjury this ³¹ ___ day of August, 2023.



Paul Mackowski

Title	2023.08.31 Affidavit of Paul Mackowski.pdf
File name	2023.08.31%20Affi...l%20Mackowski.pdf
Document ID	849776e37964872c5f1a2ad15e4c5e3c66caf8f6
Audit trail date format	MM / DD / YYYY
Status	 Signed

This document was requested from app.clio.com

Document History



SENT

08 / 31 / 2023
23:04:15 UTC

Sent for signature to Paul Mackowski
(pmackowski@mgroupltd.net) from gsaucedo@werksmanjackson.com
IP: 52.25.182.204



VIEWED

09 / 01 / 2023
00:40:36 UTC

Viewed by Paul Mackowski (pmackowski@mgroupltd.net)
IP: 24.198.137.139



SIGNED

09 / 01 / 2023
00:42:50 UTC

Signed by Paul Mackowski (pmackowski@mgroupltd.net)
IP: 24.198.137.139



COMPLETED

09 / 01 / 2023
00:42:50 UTC

The document has been completed.