

EXHIBIT 18

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

Karen Davidson,)
Debbie Flitman,)
Eugene Perry,)
Sylvia Weber, and)
American Civil Liberties Union)
of Rhode Island, Inc.,)
)
Plaintiffs,)
)
vs.) Civil Action No. 1:14-cv-00091-L-LDA
)
)
City of Cranston, Rhode Island)
)
Defendant.)

AFFIDAVIT OF BRENDA L. BRODEUR, DOC

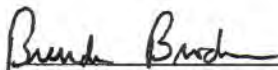
I Brenda L. Brodeur hereby declare that the following information is true and correct to the best of my knowledge and belief:

BACKGROUND

1. I am the Associate Director of Financial and Contract Management for the Department of Corrections (DOC). I have served at the DOC for 11 years and have held this position since 2011.

PAYMENTS TO THE CITY OF CRANSTON

2. As a keeper of records I have previously forwarded to Legal Counsel records of payments made by the Department of Corrections (DOC) to the City of Cranston pursuant to a subpoena request served upon the DOC in February of 2015. These records were recorded in good faith in the ordinary course of business, not in preparation for this or any other litigation. They are the only records available for payments by the DOC to the City of Cranston for the period of January 1, 2003 to December 31, 2012.
3. The DOC makes payments to the City of Cranston to reimburse the City for goods or services such as purchases from the City, the cost of taxes, sewage, ambulance services or the use/rental of City property by the DOC. These payments are intended to reimburse the City for the full cost of these services, and do so to the best of my knowledge.


Brenda I. Brodeur

Signed and sworn to before me at Cranston on this 8th day of June, 2015.

 
Roy D. Fowler Notary Public

My Commission Expires February 15, 2019