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HON. WILLIAM H. CAREY (1925-2015)

Via Electronic & First-Class Mail

March 1, 2024

Anthony C. Savastano
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Dear Mr. Savastano:

Please be advised that this office represents Jane Gonsalves, Tara George, Nicole Peixoto, Jenna Peixoto, Angela Correia, Tiffany Ilioff, and Anne Cathcart.

I write regarding the issue of unlawful gender discrimination by Club Madeirense S.S. Sacramento, Inc. ("Club")'s in its refusal to amend its bylaws to allow women to serve as festeiras/committee members of the Feast of the Blessed Sacrament ("Feast"). This unlawful discrimination results in a bar of women being Club members, as one must serve first on the feast committee to be eligible for full membership.

Since the Feast first began, Madeiran women have spent countless hours working to execute all aspects of the Feast, including holding banners in parades, working soda machines, cooking food to be sold, and pouring beer and Madeiran wine. The sexist ban serves no purpose, and is unfair to these proud Madeiran women. They deserve to serve as Club members and have their voices heard and count. Moreover, their exclusion indicates the Club's disrespect to women, and nullifies equal opportunity to celebrate their Madeiran heritage alongside men.

There is nothing our clients want more than to have this issue resolved amicably. They seek a Club vote to amend the bylaws to eliminate the requirement that festeiras be limited to males. My clients feel passionately about their heritage, and treasure the Feast traditions and community. My clients ask that this issue be added to the agenda for the

March 14, 2024 Board of Directors meeting and to the March 24, 2024 General Assembly meeting.

If this issue is not resolved with a successful vote in favor of eliminating the male requirement from the bylaws, my clients are prepared to file suit with the Massachusetts Commission Against Discrimination and thereafter the Bristol County Superior Court, where we are confident that my clients will prevail in proving that the Club is engaged in unlawful gender discrimination in violation of M.G.L. c. 151B and M.G.L. c. 272, §§ 92A and 98. As you are aware, if my clients are successful, the Club will be forced to pay my clients' attorneys' fees, costs, and be exposed to the possibility of an entry of punitive damages against the Club.

Aside from our confidence in the merits of their legal claims, it would appear that the Club is already losing in the court of public opinion. The majority of the response in the media and social media, including calls in to Fun 107 when the Club's failure to pass amendment to the bylaws made it to a radio broadcast, has been outrage over the Club's outdated, antiquated, misogynistic, and, frankly, arbitrary practices. Should this matter proceed to litigation, one could reasonably anticipate that local and even national news outlets would take great interest. This could affect the Feast's attendance this year, which would financially harm the Club. Further, should the Commonwealth become aware of the Club's discriminatory behavior towards women, it could put the Club at risk of claw back of the ARPA funds that it received from the Commonwealth.

Very truly yours,

Adrienne Catherine H. Beauregard-Rheaume

ACHBR/mp