

DOCKET NUMBER 2020-15 : OFFICE OF STATE ETHICS
: :
IN THE MATTER OF A : 165 CAPITOL AVENUE, SUITE 1200
: :
COMPLAINT AGAINST : HARTFORD, CT 06106
: :
SEABURY PFRA, LLC : JUNE 13 , 2022

Affidavit of Jeffrey Erickson

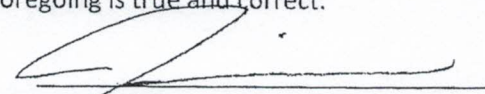
I, Jeffrey Erickson, being duly sworn hereby depose and say that:

1. I am over the age of eighteen (18) years and understand the obligations of an oath.
2. I am currently, and at all relevant times referred to in this affidavit have been, a resident of the State of Minnesota.
3. I have knowledge of the facts set forth herein, or knowledge derived from others, based on records pertaining to Seabury PFRA, LLC ("Seabury PFRA") made and kept by or on behalf of Seabury PFRA in the ordinary course of business (the "Records").
4. I am currently employed by Seabury Capital Group LLC ("Seabury Capital Group") in Minneapolis, Minnesota, and have been since August of 2010.
5. I currently hold the position of Chief Financial Officer, and have held this position since June of 2017.
6. In the years 2017 through 2019, Seabury PFRA was a subsidiary of Seabury Capital Group. Seabury PFRA was subsequently legally dissolved.
7. The documents with Bates stamp numbers Sea-001 through Sea-015 (attached hereto) are true and accurate copies of records made, maintained and otherwise kept by or on behalf of Seabury PFRA in the ordinary course of Seabury PFRA's business.

8. The documents with Bates stamp numbers Sea-001 through Sea-015 were previously provided to the Connecticut Office of State Ethics at their request.
9. Bates stamp number Sea-001 is a copy of a receipt from Tiffany & Co. for Seabury PFRA's purchase of leather wallets and zip dome pouches made on April 30, 2017.
10. Bates stamp number Sea-002 is a copy of a screenshot from Seabury PFRA's internal accounting system showing a charge of \$213.38, paid by or on behalf of Seabury PFRA, for an overnight stay and dining charges made on August 16 and 17 at the Greenwich Country Club.
11. This screenshot depicting Seabury PFRA's internal accounting (Bates stamp number Sea-002) reflects that the "Room was for Mr. and Mrs. Evan Matthews (CPA)".
12. Bates stamp number Sea-003 is a copy of a screenshot from Seabury PFRA's internal accounting system showing a charge of \$522.18 for dining charges made on August 16, 2017 at the Greenwich Country Club, which were ultimately paid by or on behalf of Seabury PFRA.
13. Bates stamp number Sea-003 also reflects that the guests associated with the August 16, 2017 dining charges were Henry Juan, Don Frost, Evan Matthews ("Matthews"), Kristen Matthews, and Marilyn Juan.
14. Bates stamp numbers Sea-004 through Sea-007 (4 pages) are copies of two (2) dining receipts dated August 16, 2017, totaling \$522.18 for food and drink at Greenwich Country Club, as also indicated in Bates stamp number Sea-003.
15. Based on a search of the Records by representatives of Seabury Capital Group, there does not appear to be any record in Seabury PFRA that indicates Matthews or his spouse reimbursed or otherwise compensated Seabury PFRA for any items or costs associated with food, drinks or lodging at Greenwich Country Club on August 16 and 17, 2017.
16. Bates Stamp number Sea-008 is a copy of an invoice from SUNY Maritime College for the 2019 SUNY Maritime College's Admiral's Dinner, dated April 2, 2019. Bates Stamp number Sea-008 reflects that the sponsorship cost \$15,000.00; that the sponsorship includes "Priority seating for 2 Tables of 10"; and that the invoice is marked as paid.
17. Bates Stamp numbers Sea-009 and Sea-010 (2 pages) are copies of an email receipt from Brahmin Handbags and received by gpena@seaburypfra.com, dated April 25, 2019, for purchases by or on behalf of Seabury PFRA of eight (8) leather handbags costing \$175.00 each and totaling \$1,400.00 (or, \$1,514.08, including tax and shipping costs).

18. Based on a search of Records by representatives of Seabury Capital Group, there does not appear to be any record in Seabury PFRA that indicates Matthews or his spouse reimbursed or otherwise compensated Seabury PFRA for any items or costs associated with their attendance at the 2019 SUNY Maritime College's Admiral's Dinner.
19. Bates stamp number Sea-011 is a copy of a receipt for the purchase of six (6) tickets for a Boston Bruins playoff game held on May 9, 2019. Bates Stamp number Sea-011 reflects that each ticket for the May 9, 2019 game cost \$678.60, plus fees.
20. Bates stamp number Sea-012 is a copy of a receipt dated May 9, 2019 from Boston Chops restaurant in the amount of \$1,040.23.
21. Bates stamp number Sea-013 is a copy (with account number information, and personal address redacted) of a Wells Fargo bank record showing a check from Andrew Lavigne ("Lavigne") to "Seabury Maritime, LLC" in the amount of \$1,051.15. The memo of Lavigne's check reflects "Reimbursement for 5/9 Dinner (173.71) + Ticket (877.14)".
22. Bates stamp number Sea-014 is a copy (with account number information, and personal address redacted) of a Wells Fargo bank record showing Matthews' check to "Seabury Maritime" in the amount of \$1,051.15.
23. Bates stamp number Sea-015 is a copy (with account number information redacted) of a Wells Fargo bank record showing a Seabury PFRA deposit slip on August 6, 2019, for Matthews' and Lavigne's checks, totaling \$2,102.30.

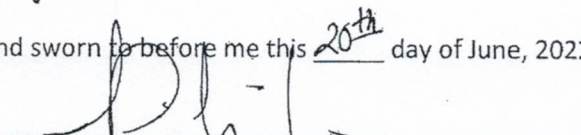
I declare, under penalty of perjury, that the foregoing is true and correct.


 Jeffrey Erickson

STATE OF MINNESOTA :
 COUNTY OF Washington :

ss.

Subscribed and sworn to before me this 20th day of June, 2022.


 Notary Public

My Commission Expires: 01/31/27

