

DOCKET NO. FBT-CV-15-5030346-S : SUPERIOR COURT  
AMIEL DABUSH DOREL : J.D. OF FAIRFIELD  
v. : AT BRIDGEPORT  
LLOYDS LONDON : January 22, 2016

**AFFIDAVIT OF WILLIAM MEEHAN**

William A. Meehan, being duly sworn, deposes and says:

1. I am over the age of 18 years and of sound mind. Unless otherwise indicated, I have personal knowledge of the prior proceedings stated herein.
2. I submit this affidavit in support of the motion of certain Underwriters at Lloyd's, London for an order directing the entry of judgment in their favor.
3. Attached as Exhibit D is a true copy of Mr. Amiel Dabush Dorel's September 29, 2015 deposition transcript.
4. Attached as Exhibit E is a true copy of the Statutory Form Quit Claim Deed deeding from Ophir Sahar to Mr. Dorel the premises known as 414 Jackson Avenue, Bridgeport and marked as "Defendant's Exhibit 2" at Mr. Dorel's September 29, 2015 deposition.
5. Attached as Exhibit F is a true copy of the Sworn Statement In Proof of Loss identified by Mr. Dorel as relating to a May 10, 2014 water damage loss at the premises known as 414 Jackson Avenue, Bridgeport and marked as "Defendant's Exhibit 14" at Mr. Dorel's September 29, 2015 deposition.
6. Attached as Exhibit G is a true copy of the Police Report dated June 20, 2014 and marked as "Defendant's Exhibit 5" at Mr. Dorel's September 29, 2015 deposition.

Dated: Wilton, Connecticut



William A. Meehan

Subscribed and sworn to before me  
this 22<sup>nd</sup> day of January, 2016.



Commissioner of the Superior Court

**William J. McMorris, Jr.**

# **EXHIBIT D**

1 -----x  
 2  
 3  
 4 DOCKET NO:CV-15-5030346 S : SUPERIOR COURT  
 5 AMIEL DABUSH DOREL : J.D. OF FAIRFIELD  
 6 VS. : AT BRIDGEPORT  
 7 LLOYDS LONDON : SEPTEMBER 29, 2015  
 8 -----x  
 9  
 10  
 11 Deposition of **AMIEL DABUSH DOREL**, taken  
 12 pursuant to the Connecticut Rules of the Practice  
 13 Book, held at The Law Offices of Slutsky, McMorris,  
 14 & Meehan, LLP, 396 Danbury Road, Wilton, CT, before  
 15 Emily Collette, LSR, a Notary Public in and for the  
 16 State of Connecticut, License No. 503, Tuesday,  
 17 September 29, 2015, at 1:52 p.m.  
 18  
 19  
 20 A+ Reporting Services  
 21 P.O. Box 831  
 22 Wallingford, CT  
 23 (203) 269-9976  
 24  
 25

1 APPEARANCES:  
 2  
 3 **PLAINTIFF:**  
 4 EDWARD LEAVITT  
 5 25 Bluff Avenue  
 6 West Haven, CT 06516  
 7 By: EDWARD LEAVITT, ESQUIRE  
 8 (For the Plaintiff, Amiel Dabush Dorel)  
 9  
 10 **DEFENDANT:**  
 11 LAW OFFICES OF SLUTSKY, McMORRIS & MEEHAN, LLP  
 12 396 Danbury Road  
 13 Wilton, CT 06897  
 14 By: WILLIAM MEEHAN, ESQUIRE  
 15 (For the Defendant, Lloyds London)  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 Transcript Legend  
 2  
 3 [sic] - Exactly as said.  
 4 [phonetic] - Exact spelling not provided  
 5 [--] - Break in speech continuity  
 6 and/or interrupted sentence.  
 7 [...] - Indicated omission of word[s]  
 8 when reading OR trailing off  
 9 and not finishing a sentence.  
 10  
 11  
 12 WITNESS INDEX  
 13 AMIEL DABUSH DOREL PAGE  
 14  
 15 Direct Examination by Mr. Meehan.....6  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 LIST OF EXHIBITS  
 2 (Marked for identification)

| 3 DEFENDANT   | 4 DESCRIPTION OF EXHIBITS                  | 5 PAGE |
|---------------|--|--------|
| 6 EXHIBIT NO. | 7  | 8      |
| 9 1           | 10 Notice of Deposition                    | 11 7   |
| 12 2          | 13 Quitclaim Deed                          | 14 61  |
| 15 3          | 16 Release of Mortgage                     | 17 61  |
| 18 4          | 19 May 10, 2014<br>20 Water Loss Documents | 21 62  |
| 22 5          | 23 Incident Report                         | 24 62  |
| 25 6          | Property Loss Notice                       | 62     |
| 7             | Jimcor Agency Documents                    | 62     |
| 8             | Capstone Document                          | 62     |
| 9             | Document                                   | 62     |
| 10            | Capstone Document                          | 62     |
| 11            | Document                                   | 62     |
| 12            | Document                                   | 62     |
| 13            | Financial Log                              | 62     |
| 14            | Sworn Statement and<br>15 Proof of Loss    | 16 66  |
| 17 15         | 18 Invoice                                 | 19 99  |

20  
21  
22  
23  
24  
25

## STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED BY and among counsel representing the parties that all formalities in connection with the taking of this deposition, including the place, sufficiency of notice, and the authority of the officer before whom it is being taken may be hereby waived.

IT IS FURTHER STIPULATED AND AGREED BY and among counsel representing the parties that the objections other than as to form are reserved to the time of trial.

IT IS FURTHER STIPULATED AND AGREED BY and among counsel representing the parties that the reading and signing of the transcript shall not be waived.

IT IS FURTHER STIPULATED AND AGREED BY and among counsel representing the parties that proof of the qualification of the Notary Public before whom the deposition is being taken is hereby waived.

(AMIEL DABUSH DOREL, having been duly sworn by Emily Collette, Notary Public, was examined and testified under oath as follows:)

THE COURT REPORTER: Would you please state your name and address for the record.

THE DEPONENT: Amiel Dabush Dorel. 14 Marshall Lane, Weston, Connecticut.

DIRECT EXAMINATION  
BY MR. MEEHAN:

Q. Good afternoon, Mr. Dorel. This is a deposition proceeding. Have you ever had your deposition taken before?

A. Maybe a long, long time ago.

Q. Okay. Well, my questions and your answers are going to be transcribed by the court reporter sitting to your right. And one thing to keep in mind is that it's difficult for the court reporter to transcribe two people talking at the same time. So, please wait until I finish my question before you interpose an answer and likewise, I'll try to wait until you're done with your answer before asking you another question. I'm just saying this because in natural conversation people tend to talk over each other, but for purposes of the deposition, it's important to keep it separate so that it's

easier for the court reporter to transcribe it. As I indicated, I'll be asking you a series of questions if you don't understand the question, please let me know, otherwise if you answer the question, I'm going to assume that you understood the question. Okay?

A. Sure.

Q. Okay. So, let me mark as an exhibit the most recent deposition notice in this case.

(Whereupon, Notice of Deposition marked Defendant's Exhibit 1 for Identification.)

BY MR. MEEHAN:

Q. Mr. Dorel, I'm going to show you what's been marked as Exhibit 1. It's the deposition notice that was issued in connection with this deposition. Actually, this is the most recent deposition notice since this case, this deposition has been adjourned a number of times since it was first noticed. But, in any event, the deposition notice has a request that you produce here at the deposition certain categories of documents. Prior to this deposition, have you seen this deposition notice or one of the prior versions of the deposition notice?

A. Yeah, prior. I don't think I ever saw

this one.

Q. Okay.

A. So is that the same '14?

Q. The document requests are the same, only difference is that the dates have changed.

A. Yup.

Q. So that --

A. That's good.

Q. -- the one that was marked as an exhibit here today refers to you appearing today, September 29, we got the date right. But otherwise the prior notices were the same as Exhibit 1.

A. Okay.

Q. So, you had an opportunity to review the document requests?

A. Yes.

Q. Did you bring with you today some documents in response to the request?

A. I did.

Q. Can you tell me just generally what you brought with you or is there some way for you to describe what you did?

A. Okay. Yes. What I didn't bring are the photographs. I had like a crash on my hard disk the other day and those are going to be retrieved, but

1 it will take me a few good weeks to kind of do that.  
 2 Q. Okay.  
 3 A. There are a lot of kind of items that are  
 4 related to photographs of the site after. I know  
 5 that most of it was also kind of taken by the  
 6 insurance. I was there when the insurance adjustor  
 7 or whatever you call this person that came on behalf  
 8 of the insurance company, he took pictures of  
 9 everything. So, those should be available I believe  
 10 somewhere.  
 11 Q. Okay.  
 12 A. If we --  
 13 Q. So, the photos that you mentioned that  
 14 were on the computer --  
 15 A. Yes.  
 16 Q. -- is that it?  
 17 A. Well, I had some, you know, if we go  
 18 through everything I'll tell you exactly what is  
 19 missing because if that is something that can be  
 20 retrieved, but it will take some time, additional  
 21 time.  
 22 Q. Okay.  
 23 A. But again, most of it can be retrieved by,  
 24 if we are going to depose this gentleman I'm sure he  
 25 has.

1 Q. Well, for the purposes of today --  
 2 A. Yeah.  
 3 Q. -- we're concerned with what you know and  
 4 what you have available to you.  
 5 A. Sure.  
 6 Q. And not trying to figure out what somebody  
 7 else may have.  
 8 A. Yup.  
 9 Q. Okay. So, looking through the list of  
 10 documents that would begin on page two of the  
 11 deposition notice, right?  
 12 A. Yes. Okay. So, yes, if we go, I have a  
 13 copy for you. So, you asked for the deed mortgage,  
 14 I have like a document to show there was a quitclaim  
 15 from the previous owner of this property to me.  
 16 Q. Okay.  
 17 A. That's it.  
 18 Q. All right.  
 19 A. Release of mortgage, okay. Then we have  
 20 the actual contract, but I guess you have a copy of  
 21 that so I don't have to -- I didn't make a copy  
 22 this, so but I guess you have that. This document.  
 23 Q. You're referring to the insurance policy?  
 24 A. Yes.  
 25 Q. Okay.

1 A. Okay. Then I have the -- then those are,  
 2 you know, exchange documents between myself and the  
 3 insurance declaring about the loss.  
 4 Q. That's with respect to number three?  
 5 A. Yeah.  
 6 Q. Okay. So you have --  
 7 A. Okay.  
 8 Q. -- some documents responsive to that?  
 9 A. Yeah. So, sometimes it says three, but  
 10 it's actually four, so, I'm just giving you all  
 11 this. Maybe you have copies because everything that  
 12 I'm giving you was submitted at one point to the  
 13 insurance company to the agent, so, you may have  
 14 copies of everything but just in case. That's the  
 15 police report. So, it's easier to kind of go and  
 16 say what I don't have.  
 17 Q. Well, so, I think you were, where were you  
 18 on the list here?  
 19 A. It's a good question because let's see --  
 20 Q. I realize that some things are going to  
 21 overlap and may have been requested twice.  
 22 A. Sure.  
 23 Q. So, but if we just go through --  
 24 A. Okay, I guess. Yeah.  
 25 Q. You mentioned number one, the deeds and

1 mortgages.  
 2 A. Yeah, that's there.  
 3 Q. Then two you mentioned, you have a copy of  
 4 the insurance policy.  
 5 A. I have my own copy.  
 6 Q. Right.  
 7 A. But I believe that this is -- you have  
 8 your own.  
 9 Q. Okay.  
 10 A. Okay.  
 11 Q. Then you were talking about documents you  
 12 have relating to the insurance claim, which you have  
 13 some documents there?  
 14 A. Yes.  
 15 Q. Documents related to a loss at 414 Jackson  
 16 Avenue occurring on May 10, 2014.  
 17 A. Okay. Now, let me just like explain,  
 18 okay. So, I have a group of individuals that are  
 19 working for me full-time, almost. They are doing  
 20 different projects at any given time. When the  
 21 damage, when we found out about the damage,  
 22 everybody stopped, okay, doing whatever they was  
 23 doing and kind of focused on immediately attacking  
 24 the problem and minimize the damage. So, I don't  
 25 really have an exact count of how many hours each

1 one of my guys was working for this, but after  
 2 everything was said and done, we kind of compiled, I  
 3 would say, an estimate, okay, of how much we  
 4 invested in repairing everything and bringing  
 5 everything to the point where it was just prior to.  
 6 Because at one point there is a request to submit as  
 7 if I hired an external group to do the job, but I  
 8 didn't have to because my -- first of all, I could  
 9 call somebody in the middle of the night and he  
 10 would go and because I mean -- the problem was that  
 11 water kept on coming from a broken pipe that was  
 12 triggered by the break in, so that had to be stopped  
 13 and then obviously the water had to be kind of  
 14 cleaned up from the basement. So there were like a  
 15 few steps, you know, in order to attack that we had  
 16 to take in order to stop the damage that was  
 17 unfolding as we go.

18 Q. We'll talk about that.

19 A. Yeah.

20 Q. How it happened and that sort of thing in  
 21 a little bit. I'm just trying to get through the  
 22 documents list first.

23 A. Yeah, I'm just...

24 Q. So number four.

25 A. Yes.

1 Q. Is talking about documents related to --  
 2 A. Yeah.  
 3 Q. -- a loss that occurred or on May 10,  
 4 2014.

5 A. You can maybe -- sorry.

6 Q. So, looking at this police report that you  
 7 produced that indicates that the loss occurred on  
 8 June 20?

9 A. Yes.

10 Q. Okay. So, the May 10, 2014 is --

11 A. That was a different case all together.

12 Q. Right. So, that's what we're talking  
 13 about in item four.

14 A. Yeah but that's -- that's a case that was  
 15 settled and was paid and was not like, over. That  
 16 was a completely different case and even though I  
 17 think I have something related to this, but I  
 18 completely read that as to the same thing.

19 Q. Okay.

20 A. But we had the case on May 14 there was a  
 21 damage that caused by, you know, rain of, I mean, it  
 22 was a very kind of like very hectic day and a lot of  
 23 rain came into the basement, but the damage was way  
 24 less than what the second one was. It was, you  
 25 know, maybe \$2,000 or \$3,000 repair, the insurance

1 paid, and you know, that was it.

2 Q. Okay.

3 A. A month later, I mean we had this break in  
 4 and unfortunately to the same kind of area that was  
 5 just repaired and that's why we are here.

6 Q. Okay. So, but in any event, because it  
 7 was the same area and it was close in time to the  
 8 second loss...

9 A. Yeah.

10 Q. The deposition notice asked for you to  
 11 produce the document related to the May 10, 2014.

12 A. Which I, yeah, if I brought everything  
 13 with me, so I'll have to go through the files and  
 14 kind of dig that. I have the stuff, even the  
 15 canceled check of the insurance that I deposited. I  
 16 should have that for sure.

17 Q. Okay. So, you're saying that you may or  
 18 may not have it with you today or you don't have it  
 19 with you?

20 A. If I have to guess, I have it, but you see  
 21 I have all this I have to go through.

22 Q. Okay.

23 A. So, I should suggest that we kind of  
 24 number each one and kind of put aside so that we got  
 25 this, we got this.

1 Q. Yeah. In essence, that's what I'm trying  
 2 to do here.

3 A. Okay. So, we can kind of.

4 Q. I think you went through one, two, and  
 5 three and you said you had some documents responsive  
 6 to.

7 A. This is one, okay. This is two and one,  
 8 so, two we said it's the contract that we kind of  
 9 skipped. So, we have three, is the claim, okay.  
 10 There's some kind of an extension of the claim, this  
 11 is my reference to this lady, Sheila, okay. We said  
 12 that's -- yeah, this is the same, so this is just a  
 13 copy. This is her replying to me. Number three, so  
 14 we have several overlapping, not overlapping, like  
 15 kind of an exchange.

16 Q. Right. All right. Well, let me do it  
 17 this way. I think I can get through that faster.

18 A. Okay.

19 Q. That way we'll get done what we have to  
 20 get done here. Okay. So, that's the police report  
 21 you mentioned.

22 A. Yes, I don't think we got yet to here.

23 Q. No, we haven't, but that's all right. So,  
 24 with respect to number four, the documents related  
 25 to the May 10, 2014 --

1 A. Let me see.  
 2 Q. -- incident. And these requests are,  
 3 they're all inclusive, that means that all your  
 4 documents related to that event?  
 5 A. Yeah.  
 6 Q. So, with that in mind, do you have all the  
 7 documents related to the May 10, 2014, loss with  
 8 you?  
 9 A. I should have, but let's see. I wasn't  
 10 really prepared for this, but I was kind of focusing  
 11 on the -- okay. Here. So, this is the -- I didn't  
 12 make a copy of it, but there is one. That's the  
 13 check I received because of that.  
 14 Q. Okay.  
 15 A. So, this is yes, that's my report, that's  
 16 yeah. I'm more organized than I thought. So, that  
 17 has to do with the prior, yes, this is also. This  
 18 is yeah. Yeah. Yes. Yes. Okay. I don't have a  
 19 copy, that's my original.  
 20 Q. Well, you know, with respect to things,  
 21 why don't we just put a paperclip on that, with  
 22 respect to things that you didn't copy before you  
 23 came here today, can we have an understanding that  
 24 you just leave them here at the end of today and  
 25 I'll make a copy and give them back to you?

1 A. Fair enough.  
 2 MR. LEAVITT: Sure.  
 3 BY MR. MEEHAN:  
 4 Q. All right. Just put a four on there.  
 5 A. Yes.  
 6 Q. Now, these documents that you have just  
 7 found with respect to the May 10, 2014 water damage  
 8 loss, is this your complete set of records with  
 9 respect to that loss?  
 10 A. Yes, that's what I have.  
 11 Q. Do you have any --  
 12 A. Pictures?  
 13 Q. -- pictures of the loss?  
 14 A. Same thing. I mean, I have, this is  
 15 actually, I have a system that is like 25 years old,  
 16 never had an issue, I just had an issue less than  
 17 two weeks ago.  
 18 Q. Okay.  
 19 A. Take a while, some time, to retrieve  
 20 everything and to bring everything.  
 21 Q. The May 2014 loss, how did that occur?  
 22 A. Just water came to the basement through,  
 23 it was, you know, kind of a few very, very heavy  
 24 rain and water simply penetrated through the, what  
 25 do you call it, the name for it? Like entrance to

1 the basement from the...  
 2 Q. Cellar door or something?  
 3 A. Yeah. Yeah. So...  
 4 Q. Okay. So, that's number four. Apart from  
 5 the photos which you have on your computer at home,  
 6 there's no other --  
 7 A. Everything was pretty standard. I mean, a  
 8 gentleman from the insurance came, took pictures and  
 9 then we filed a claim okay, and you know, that was  
 10 simple.  
 11 Q. Okay. I'm going to have to remind you  
 12 what we talked about initially and that's not to  
 13 talk over each other.  
 14 A. Okay.  
 15 Q. Okay?  
 16 A. Sorry.  
 17 Q. But apart from the photos that are on your  
 18 computer that you're having trouble with at home, do  
 19 you have any other records concerning the May 2014  
 20 loss?  
 21 A. I don't think so, but no, I don't think  
 22 so.  
 23 Q. Well, the May 2014 loss caused some  
 24 damage, right?  
 25 A. Yes.

1 Q. Okay. Did you have to fix the damage?  
 2 A. Sure.  
 3 Q. How was the damage fixed?  
 4 A. I have people, you know, going there and  
 5 fixing the damage.  
 6 Q. Okay. Did you have to pay them for the  
 7 damage?  
 8 A. Sure.  
 9 Q. All right. How did you pay them?  
 10 A. With money.  
 11 Q. Okay. So, do you have --  
 12 A. The thing is, okay.  
 13 Q. Do you have any records with respect to  
 14 repairing the damage?  
 15 A. Okay, so the thing is, that I have a group  
 16 of people that are working for me, okay, this is  
 17 what we do. At least I used to go, I mean, take a  
 18 house, buy a house -- in this particular case it was  
 19 a little different, but take a house and try to fix  
 20 it and then trying to flip it. This was a different  
 21 case because the house, this 414 Jackson, was a  
 22 house that was already fixed, so, I kind of wanted  
 23 it for myself. But then when we had the damage I  
 24 got my group to do that and, you know, everything is  
 25 on the book, on the books. I mean, I have a good --

1 but it's like as if you have a lawyer, I mean,  
 2 assigned to do this job and then he's assigned to  
 3 this job and so forth. It's not like I hire  
 4 somebody specially to fix something. So, it may be  
 5 a little different, but this way is much cheaper and  
 6 much faster and more reliable for me to do.  
 7 Q. Okay. So, then what you're saying is that  
 8 you don't have any records --  
 9 A. Yeah, well.  
 10 Q. -- separate from --  
 11 A. Well --  
 12 Q. You don't have any records that relate to  
 13 fixing the damage from the May 2014 loss?  
 14 A. So, the record could be, let's say Home  
 15 Depot receipts, could be money that is being  
 16 exchanged, I have all this. I have all this.  
 17 Q. Okay.  
 18 A. If this is what you're referring to.  
 19 Q. Yes.  
 20 A. Yeah.  
 21 Q. Okay. So --  
 22 A. Yeah, again, I didn't bring, but because  
 23 of the proximity of the two events are so close,  
 24 it's kind of almost overlap as far as payment.  
 25 Okay, what I brought with me -- no, it's just I have

1 a ledger that kind of started here, but it's very  
 2 easy to produce. Started only after the second  
 3 event as far as money as far as invoices.  
 4 Q. Okay. So, but that's the second event,  
 5 let's just focus on the --  
 6 A. I can produce that. I mean, that's, you  
 7 know, I will work and I can do that.  
 8 Q. We're looking for all of the receipts that  
 9 you may have related to --  
 10 A. Yeah.  
 11 Q. -- repairing the damage --  
 12 A. The first one.  
 13 Q. -- from the May event and also if you paid  
 14 contractors or trades people to repair the damage  
 15 from the first event, their invoices to you. And I  
 16 presume, do you pay people with checks or cash or  
 17 what?  
 18 A. Yeah.  
 19 Q. Checks?  
 20 A. Checks mainly or I do a transfer. If they  
 21 are, one of my guys has the same bank account, like  
 22 I work with Chase, I just do transfer from my  
 23 account to his account.  
 24 Q. Is that an ACH transfer?  
 25 A. Sometimes it's just a transfer. I call

1 the branch and say, listen, take this kind of money  
 2 and transfer to there.  
 3 Q. Okay.  
 4 A. That's why sometimes I don't have  
 5 actually, when I was about to procure all this, I  
 6 was looking for it, but then I realized I have all  
 7 this transfer, I mean, that's not really supported  
 8 by physical check.  
 9 Q. Right.  
 10 A. But it's there. If I show you my --  
 11 Q. Well, the bank will generate some sort of  
 12 record when it makes the transfer, right?  
 13 A. Yes.  
 14 Q. Okay. It's like some sort of transfer  
 15 confirmation or something to that effect?  
 16 A. It does. I mean, if I go online and I go  
 17 and then you see it. You see the amount, you see  
 18 the funds was moved from this account to this  
 19 account. I have it on my books as well.  
 20 Q. Okay.  
 21 A. So, I have support for all of this.  
 22 Q. Okay. So, all of those types of documents  
 23 that we're talking about with respect to the May  
 24 2014 loss, that's what we were asking you to produce  
 25 here and since apparently there's been a little bit

1 of misunderstanding.  
 2 A. Honestly.  
 3 Q. If you would after we're done here, gather  
 4 that stuff up and get it over to me, either you can  
 5 make copies and send me the copies or send me the  
 6 originals and I'll have them photocopied. Whatever  
 7 way you want to do it, just make it clear to me what  
 8 it is that I have to do, whether I have to return  
 9 copies to you or what I'm getting is something I can  
 10 keep.  
 11 A. Okay.  
 12 Q. Okay. So that's number four. Number five  
 13 is similar I believe we just spoke about number five  
 14 that also relates to the May 10 loss, okay? One  
 15 talks about documents and the other talks about  
 16 records.  
 17 A. To be honest with you, I mean this is a  
 18 completely kind of like not ignored but keep this,  
 19 now I see that we have like one two, three, four  
 20 related to this May '14.  
 21 Q. Right, all the way through.  
 22 A. I thought as the June, I didn't think that  
 23 we are going to be even talking about the May,  
 24 but...  
 25 Q. Right. Right.

1 A. But definitely, I will.  
 2 Q. So, items four through eight relate to the  
 3 May 10, 2014 loss.  
 4 A. Yeah.  
 5 Q. So, I need to get your response with  
 6 respect to those --  
 7 A. Okay.  
 8 Q. -- five items, okay?  
 9 A. Definitely.  
 10 Q. You can't do that right now because you're  
 11 here, but after we're done.  
 12 A. Tomorrow.  
 13 Q. Okay. If you would, thank you. Getting  
 14 to number nine looks like nine, ten, eleven these  
 15 are documents and records related to the June 20,  
 16 2014, loss?  
 17 A. Yes.  
 18 Q. Now you marked a couple where you added to  
 19 the pile here a few records and you mentioned that  
 20 you have some other things that you put together.  
 21 A. Yes, all this. That's, I have copies of  
 22 this.  
 23 Q. Okay. So, within those categories of  
 24 items, nine through eleven would be, in addition to  
 25 the records you got here, things like receipts,

1 invoices, checks paying for repair costs, things of  
 2 that nature?  
 3 A. Yes. I can -- well, if we need to again,  
 4 I mean, invoices from -- just because of the nature  
 5 of how I do business, I don't really get invoices  
 6 from people that are working for me, that are  
 7 working. Whether they're doing A and B, they are  
 8 still working. I mean...  
 9 Q. These people are on salary, is that what  
 10 you're saying?  
 11 A. Salary, they are, yes. In most cases,  
 12 yes. So, they are 1099, most of them are like  
 13 contractor, but it's not like on a -- they are  
 14 either working on an hourly basis or yeah, basically  
 15 that's it. So, they don't really give me a --  
 16 submit an invoice. But the plumber did give me an  
 17 invoice so that I can produce or if not, can I ask  
 18 him to do it.  
 19 Q. Okay. So --  
 20 A. That's the only professional I used was a  
 21 plumber in the second case because the pump needed  
 22 to be replaced and the boiler needs to be repaired  
 23 or replaced, so that's as far as...  
 24 Q. Okay. So, what records do you have  
 25 concerning the amount that you paid to people with

1 respect to the June 20, 2014?  
 2 A. Well, I have -- sorry. I have the amount  
 3 of work, an estimate of kind of how much time,  
 4 multiplied by what he was paid, if somebody worked  
 5 through the night, I paid them more than I usually  
 6 pay. And they have -- I have compiled an estimate  
 7 of all my credit card for this particular repair,  
 8 stuff like this. You know...  
 9 Q. Okay. So, what we're interested in is all  
 10 your records that relate to what you spent in order  
 11 to repair the damage.  
 12 A. All right.  
 13 Q. Okay. Am I correct that you don't have  
 14 all your records with you here today?  
 15 A. Well, I do. I do, but obtaining the  
 16 record is slightly different in my case than maybe  
 17 somebody who was completely out of this trend, that  
 18 has to call somebody. That could have been much  
 19 easier. If I would have called a third party and  
 20 said, listen I got an issue, fix it, and give me an  
 21 invoice, but, you know, first of all, in my case I  
 22 could not even wait and I didn't have to. It's like  
 23 if you have a legal issue and you call somebody else  
 24 to do the work. I mean, I have people that this is  
 25 what they do. And they were ready to, you know,

1 start the job immediately upon me calling them.  
 2 Q. Okay.  
 3 A. So, slightly different. Sorry.  
 4 Q. Well, these people that you're talking at,  
 5 who do they work for?  
 6 A. They work for me.  
 7 Q. Okay.  
 8 A. All have names and they are ready to  
 9 testify.  
 10 Q. Okay. When you say they work for you,  
 11 what business is that?  
 12 A. Well, they again, I have some businesses  
 13 that I do carpentry. I have only business I do, I  
 14 fix houses. I have, you know, this is the kind of  
 15 things. So, it's like they know how to put  
 16 sheetrock in, how to put cabinetry, they know to you  
 17 do electric jobs.  
 18 Q. So --  
 19 A. Contractor.  
 20 Q. Are these subcontractors of yours?  
 21 A. But they are, yeah, but they are 100  
 22 percent working for me. Come every day, they ask  
 23 what should we do.  
 24 MR. LEAVITT: As far as, he said they're  
 25 employees, not subcontractors, I think.

1 THE WITNESS: Well, they are not like W2.  
 2 They have -- we have an arrangement of  
 3 they come, they're independent, but they  
 4 are working for me 100 percent.  
 5 BY MR. MEEHAN:  
 6 Q. 1099?  
 7 A. They can be 1099, but they are LLCs, like  
 8 Dave O'Hara for instance, Dave O'Hara, that's his  
 9 name but he's an LLC.  
 10 Q. He's a subcontractor?  
 11 A. Yes, but he comes to work. Unfortunately,  
 12 he just stopped working a week ago, but that's a  
 13 side show.  
 14 Q. Okay.  
 15 A. But he was working for me, sorry, for 20  
 16 years.  
 17 Q. So, you have a construction business,  
 18 right?  
 19 A. Kind of, yeah you can call it this. I  
 20 have a few businesses.  
 21 Q. Okay. One of your businesses is a  
 22 construction business?  
 23 A. Yes.  
 24 Q. Right. What is the name of that business?  
 25 A. Concept USA.

1 showed he how good of a building it could be, kind  
 2 of buying, you know, advantage price and fix it.  
 3 Q. Okay.  
 4 A. This is where we started.  
 5 Q. Okay. So, we'll get back to that story,  
 6 okay. But I just want to get through this document  
 7 list first before we move on and you can tell me all  
 8 about it. So, the people working for, is it  
 9 Concepts, is that it?  
 10 A. Yes.  
 11 Q. These are contractors?  
 12 A. Okay. We can call them.  
 13 Q. Work for you. Because they're not your  
 14 employees, are they?  
 15 A. They are not. Not W2, no.  
 16 Q. Okay. So, in connection with the  
 17 June 2014 loss, how did they tell you how much you  
 18 had to pay them?  
 19 A. Well, it was -- look, it was, I know how  
 20 much I paid them on a regular basis, they come at  
 21 nine, they leave at six I know exactly what their  
 22 hourly rate is. But it was an extreme case like  
 23 this, where they had to work over the weekend and  
 24 over nights, everything kind of took --  
 25 Q. Let's take Mr. O'Hara since you mentioned

1 Q. Okay. So, this particular house, you  
 2 purchased it to sell, resell the house, right?  
 3 A. Well, at first that wasn't really the --  
 4 that wasn't really the idea. I have kids and I  
 5 thought okay, it's a nice house, I like the house,  
 6 so, I bought it from somebody actually, I don't know  
 7 if we have time for history, but this guy was doing  
 8 what I ended up doing. He was buying kind of  
 9 foreclosed houses and then fix them and then flip  
 10 them.  
 11 Q. So --  
 12 A. So, I kind of liked --  
 13 Q. Who is this guy that you're referring to?  
 14 A. His name is Ophir Sahar, that's his name.  
 15 Q. His name is in the deed, I take it right  
 16 here, Ophir Sahar.  
 17 A. Sahar.  
 18 Q. Sahar.  
 19 A. So, I bought the house from him. The  
 20 house was completely renovated and then I thought,  
 21 okay, it's a house, I can either, you know, give it  
 22 to one of my kids, I can maybe do something with it.  
 23 So, that was the story of this house. And kind of  
 24 like -- I got to do what I did later on because of  
 25 this house because of the other properties and they

1 him.  
 2 A. Yeah.  
 3 Q. Did he work on the June 20 --  
 4 A. Yes, he was the first one --  
 5 Q. -- loss?  
 6 A. Sorry, I keep on interrupting you.  
 7 Q. I told you it was the natural thing to do.  
 8 A. I know but it's like I cannot control it.  
 9 I'm so sorry. So, yes, Mr. O'Hara was actually the  
 10 first guy to be there and, so, I paid him double  
 11 for. I usually pay him 30 bucks, you know.  
 12 Q. Okay. So, what type of time records did  
 13 you maintain for Mr. O'Hara or Mr. O'Hara maintain  
 14 and submit to you?  
 15 A. Well, I estimated his time, okay, to be  
 16 like all together like \$3,000 bucks, okay, may have  
 17 been a little more, I mean he was happy, okay.  
 18 So...  
 19 Q. How did you estimate his time?  
 20 A. I just saw how much work he did.  
 21 Q. Okay.  
 22 A. And the time that he invested and the time  
 23 of the day that he's invested. That's...  
 24 Q. Okay. So, are you saying that you have no  
 25 invoices from Mr. O'Hara for the June 20, 2014,

1 loss?  
 2 A. No.  
 3 Q. Okay. You don't have any time records as  
 4 to the hours that Mr. O'Hara spent working as a  
 5 result of the June 20, 2014, loss?  
 6 A. Well, again, I don't have a time that --  
 7 when he comes to work it doesn't really, I mean, use  
 8 anything, regardless of this.  
 9 Q. Okay.  
 10 A. We don't really clock any of them, but at  
 11 the end, you know, we pay twice a month. So, I get  
 12 a report, okay, we work from this time to this time  
 13 and then we do a little calculation and basically  
 14 that's it.  
 15 Q. Okay. Well, when I'm saying time records  
 16 I'm using that in the broad sense, like it doesn't  
 17 have to be somebody punching in at 7:15 and out at  
 18 4:30, any kind of records showing that David was  
 19 there on Monday, Tuesday, Wednesday.  
 20 A. I can --  
 21 Q. So, I'm asking you what kind of records do  
 22 you keep. You must have some sort of method that  
 23 you use to keep practice of who is working for you,  
 24 right?  
 25 A. Yes.

1 Q. Because sometimes people don't come in  
 2 and, you know, don't work a particular day because  
 3 they're sick or they're, you know, they got to go to  
 4 vacation or something like that, right? But you  
 5 must have some method that you use in your business  
 6 to keep track of who is working for you when, right?  
 7 A. Yes. I can definitely put you to do.  
 8 Q. What is that method that you use?  
 9 A. Well, okay, first of all they come every  
 10 day, okay, then that depends on the job they do,  
 11 they are, you know, the hours of being -- for David  
 12 for instance, it's fixed. So, he can actually work,  
 13 he can work sometimes more than just eight hours a  
 14 day. Sometimes he puts like ten hours, but he would  
 15 make the same.  
 16 Q. Can I interrupt you for a second?  
 17 A. Sure.  
 18 Q. Just do clarify then, when you say "it's  
 19 fixed" do you mean that you have an agreement with  
 20 David that you're going to pay him so much per week  
 21 or month or every two weeks? What is your agreement  
 22 with David?  
 23 A. Well, yeah, I mean we have like, unless  
 24 it's extreme, like this case, he would get more or  
 25 less or let's say if he come in and comply with

1 coming, let's say at least 40 hours week, okay, then  
 2 he would get the same.  
 3 Q. So, what is your agreement -- I shouldn't  
 4 say is because you just told me that he stopped  
 5 working a week or so ago. But back in 2014, what  
 6 was your agreement with David as to how you were  
 7 going to pay him?  
 8 A. Well, we don't have an agreement, okay,  
 9 per se, but it's an understanding that --  
 10 Q. Well --  
 11 A. If he comes to work then he gets paid,  
 12 okay. And usually it's pretty much the same.  
 13 Q. Okay. So, what was the understanding then  
 14 as to what you were going to pay David for when he  
 15 would come to work?  
 16 A. I just let me, be David doesn't really  
 17 work only for me, but I expect him to at least give  
 18 me a minimum, okay, so, he does other things.  
 19 Q. No, I understand that people can also do  
 20 work for other people and I'm not trying to pin you  
 21 down as to whether these are employees or  
 22 independent contractors or anything like that.  
 23 A. Okay.  
 24 Q. I'm just trying to understand what your  
 25 agreement was with him as to how they were going to

1 get paid. And we're going take David because --  
 2 A. Okay.  
 3 Q. -- that's a person that you mentioned his  
 4 name and back in June of 2014 he worked on this  
 5 deal, this accident?  
 6 A. Yes.  
 7 Q. Okay. So, tell me then, back in June of  
 8 2014, what was your agreement with David as to how  
 9 you were going to pay him?  
 10 A. Okay. It wasn't -- nothing was specific  
 11 to that particular day. I mean, the arrangement  
 12 with David started way back, okay, that he comes, he  
 13 has to give me a minimum hours.  
 14 Q. What is the minimum hours?  
 15 A. He should give me at least, let's say,  
 16 four times, 30 hours a week.  
 17 Q. 30. How did you get to that number? You  
 18 were just thinking about something.  
 19 A. No, because I did five times -- he should  
 20 worked four days a week that doesn't work.  
 21 Q. Okay. So, you were figuring he would work  
 22 --  
 23 A. 32 hours.  
 24 Q. Eight hours a day --  
 25 A. Yeah.

1 Q. -- for you?  
 2 A. But in most cases he does a little extra.  
 3 Q. Okay. So, you figured that he was going  
 4 to work for you 32 hours a week?  
 5 A. Yes.  
 6 Q. So then how did that translate into what  
 7 you were paying David? In other words --  
 8 A. In this particular case?  
 9 Q. Well, in June of 2014 you had an agreement  
 10 with David or an understanding with David how you  
 11 were going to pay him, right?  
 12 A. No.  
 13 Q. No?  
 14 A. No. No. No. Because he came, he did  
 15 whatever he needed to do, and I estimated it was an  
 16 extreme situation, it wasn't really something that  
 17 started, okay, you had to work like almost 24 hours  
 18 around the clock to rectify and then he got  
 19 compensated for this. It was a very unique  
 20 situation.  
 21 Q. Okay.  
 22 A. I don't remember ever in the past  
 23 something, ever. Yes, I mean, there was times that  
 24 he had to be sent overseas to do a different project  
 25 and he was compensated for that as well. It really

1 depends. I mean, I would say 90 percent of the time  
 2 his pay is pretty much fixed. His compensation  
 3 pretty much fixed.  
 4 Q. So, you're saying that this June 2014  
 5 incident was something that is outside of that?  
 6 A. Absolutely.  
 7 Q. So, let's focus on the 90 percent of the  
 8 time just so that we can get that squared away and  
 9 get away from that. What was your typical  
 10 understanding with David as to how he would be paid  
 11 for that 90 percent of the time where he's working  
 12 32 hours per week?  
 13 A. Okay. There is a -- there is a number,  
 14 there's a number based on the 30 bucks an hour, more  
 15 or less, and multiple that by there are 32 hours and  
 16 then brings a number. Now, if he has any exception,  
 17 then he would deviate and go a little higher or  
 18 something.  
 19 Q. Okay.  
 20 A. I mean, most cases he would never go lower  
 21 than that.  
 22 Q. Okay.  
 23 A. He --  
 24 Q. When you say lower than that, you mean  
 25 lower than the 32 hours?

1 A. Yes, sometimes, let's say he would get, he  
 2 would be off I would kind of pay him for that off  
 3 days as well. So...  
 4 Q. Okay.  
 5 A. We had an arrangement.  
 6 Q. So, it was roughly 30 bucks per hour,  
 7 times 32?  
 8 A. Yeah.  
 9 Q. Okay.  
 10 A. Kind of.  
 11 Q. That was a typical weekly arrangement you  
 12 had with Mr. O'Hara, right?  
 13 A. Yes.  
 14 Q. Okay. Now you're saying in this  
 15 particular instance it was different. With respect  
 16 to the June 2014 loss you compensated him different,  
 17 is that true or did you just use 30 bucks an hour  
 18 times a different number?  
 19 A. Well, it was completely different.  
 20 Q. Okay. So, tell me how you did it then  
 21 with respect to the June 2014 loss.  
 22 A. Well, it was a different case. I couldn't  
 23 really just like use the same calculation because  
 24 everything was different. It was like 9/11  
 25 different. I have never faced this, a situation

1 like this and it was different. So, he kind of, he  
 2 was a trooper, he came and he fixed the situation,  
 3 kind of, at least to stop the bleeding. So,  
 4 everything was different and he was compensated for  
 5 this.  
 6 Q. Okay. So, how did you arrive at a number  
 7 to compensate him?  
 8 A. I don't know how if I can, you know, tell  
 9 you because I mean, I mean, it's there. I gave him,  
 10 you know...  
 11 Q. Okay.  
 12 A. He was never complaining about it.  
 13 Q. All right. So, with respect to the  
 14 ordinary run of the mill work that you gave to  
 15 Mr. O'Hara or his LLC, did you write him a check  
 16 every week or did you --  
 17 A. Yes.  
 18 Q. Okay.  
 19 A. Twice a month. Twice a month.  
 20 Q. Okay. Those would actually be handwritten  
 21 checks as opposed to cash?  
 22 A. Yes.  
 23 Q. Okay. Checks?  
 24 A. Yes.  
 25 Q. With respect to the June 2014 water damage

1 loss, how did you compensate Mr. O'Hara? Did you  
 2 pay him with check or did you give him cash or was  
 3 there some other way --  
 4 A. Never cash.  
 5 Q. Okay. You never paid cash?  
 6 A. I don't do cash.  
 7 Q. Okay, which is fine.  
 8 A. Okay.  
 9 Q. I'm just --  
 10 A. No. No. It's fine.  
 11 Q. Some people do and some people don't.  
 12 A. No.  
 13 Q. Then is it fair for me to assume that you  
 14 wrote a check to Mr. O'Hara?  
 15 A. Yeah, I did.  
 16 Q. That was with respect to the June 2014  
 17 water loss?  
 18 A. Yes.  
 19 Q. Okay.  
 20 A. Well again, I mean he was working.  
 21 Q. Right.  
 22 A. I didn't really kind of put a title of  
 23 what the kind of work he did. Okay. I just have to  
 24 stress that David does a lot of things, okay. We  
 25 are actually software engineers, okay, that we are

1 kind of this, whole thing of doing that is almost  
 2 like as an additional thing we do.  
 3 Q. Okay. When you say "we" are you talking  
 4 about --  
 5 A. Me and David and other, you know, people  
 6 that we have in the group. But not all, we are kind  
 7 of, part of construction, if we can call it  
 8 construction.  
 9 Q. Okay.  
 10 A. So, I have a restaurant too, which I'm out  
 11 of, so, we do a lot of things.  
 12 Q. Okay. So, then did you bring with you  
 13 today records of paying Mr. O'Hara or his LLC?  
 14 A. I have actually, yes. Because I have it  
 15 here, yeah. I have -- because there's nothing  
 16 special that I typed, okay, this money is for this,  
 17 this money is for this, he worked and then I paid  
 18 him regularly. Look, it's an arrangement. See the  
 19 thing is, I could have given him let's say two days  
 20 off with pay, stuff like this, that kind of like  
 21 compensate for this. Here. This is the pay. Each  
 22 one of these I can produce a check.  
 23 Q. Okay. So, I'll ask you about these, these  
 24 look like QuickBooks --  
 25 A. Yeah.

1 Q. -- reports of some sort, right?  
 2 A. Yes, it is.  
 3 Q. These are among the documents that you're  
 4 producing here today, right?  
 5 A. Yes.  
 6 Q. One of them appears to be a list of checks  
 7 written to David O'Hara during the period June 30,  
 8 2014 to November 17, 2014?  
 9 A. Yeah, just kind of like, you know, wanted  
 10 to show a record of, not all of this is really  
 11 related to this damage, but...  
 12 Q. Okay. So, that is Mr. O'Hara. So, in  
 13 addition to the QuickBooks records you say that you  
 14 have a check, you can produce a check for each one  
 15 of these, in fact the check numbers seem to be  
 16 listed on the --  
 17 A. Sure.  
 18 Q. -- Quickbooks report, right?  
 19 A. Yes.  
 20 Q. Okay. With respect to any other person  
 21 that was involved in repairing the damage from the  
 22 June 20, 2014 -- let me ask you a better question.  
 23 A. Okay.  
 24 Q. Who were the other people involved in  
 25 repairing the damage from the June 2014 water loss?

1 A. So, we have David, we have a gentleman  
 2 called Ermes.  
 3 Q. Sorry?  
 4 A. You can call him Hondu Contract, it's  
 5 another LLC group that works for me.  
 6 Q. Okay.  
 7 A. One, two, three, the plumber A&G  
 8 Mechanical.  
 9 Q. Okay. All right. With respect to Hondu?  
 10 A. Contracting.  
 11 Q. Contracting, do you have his records?  
 12 A. It's the same, the same thing. With him,  
 13 I don't really have checks, I do transfers because  
 14 he as a Chase account so, I just do transfer. But  
 15 on the books, on the QuickBooks, on the Concept, you  
 16 can see.  
 17 Q. Hondu Contracting.  
 18 A. Yeah.  
 19 Q. Okay. What was your pay arrangement with  
 20 Hondu Contracting?  
 21 A. Okay, he comes and he does his work, but  
 22 sometimes, I mean, most times he brings his own  
 23 people, okay. There is an hourly rate for each one  
 24 of his guys and he's for himself.  
 25 Q. So, was it his practice to give you a --

1 A. Yes.  
 2 Q. -- work report or something what would  
 3 list people working and hours and things like that?  
 4 A. Absolutely, yes.  
 5 Q. Do you have those type of records?  
 6 A. No.  
 7 Q. No?  
 8 A. I can produce them in no time.  
 9 Q. Well --  
 10 A. Give me your email, I can give it to you  
 11 by this evening.  
 12 Q. Well, there's going to be others that you  
 13 need to produce, so I'm not -- you don't have to  
 14 email it to me tonight, but if you put it into the  
 15 package of the other documents that we're talking  
 16 about here today.  
 17 A. Okay.  
 18 Q. So, just for purposes of the record, note  
 19 that I am requesting that the witness produce the  
 20 work records of Hondu Contracting, right?  
 21 A. Yes.  
 22 Q. The work records would be what he would  
 23 give to you?  
 24 A. Yes.  
 25 Q. How does he style these things? Does he

1 call them invoices or does he call them --  
 2 A. No, just like you organize it on the  
 3 spreadsheet, okay like a formula that goes and  
 4 calculates everything.  
 5 Q. What was his practice? Would he give you  
 6 a print out and hand it to you?  
 7 A. No. No. No.  
 8 Q. He would email it to you?  
 9 A. No. He actually bring me a piece of paper  
 10 and then I do whatever I need to do and I enter into  
 11 my system and basically, I come up with a number.  
 12 Once you see it, it's very easy.  
 13 Q. You have like a spreadsheet, an Excel type  
 14 spreadsheet?  
 15 A. Yes.  
 16 Q. Of Hondu contracting work, right?  
 17 A. Yes.  
 18 Q. But the piece of paper that he would give  
 19 to you.  
 20 A. Yes.  
 21 Q. What did they look like?  
 22 A. They look like paper, it's a paper.  
 23 Handwritten paper.  
 24 Q. Okay.  
 25 A. It says I started and then with the name

1 of each one of the guys and each one of his guys has  
 2 an hourly rate associated and that's how it works.  
 3 Q. Do you need a break, Ed? Take a few  
 4 minute break.  
 5 (Whereupon, Off the record at 2:46 p.m.)  
 6 (Whereupon, Back on the record at 2:48  
 7 p.m.)  
 8 BY MR. MEEHAN:  
 9 Q. So, the pieces of paper that Hondu, what  
 10 is Hondu's name, full name?  
 11 A. Well, Hondu is the LLC.  
 12 Q. Right.  
 13 A. His name is Ermes.  
 14 Q. Could you spell that for the court  
 15 reporter?  
 16 A. Yeah, E-M almost like the bag, fancy,  
 17 actually exactly the name, who is like a French  
 18 designer. That's his name.  
 19 Q. Okay.  
 20 A. Nothing, no relationship.  
 21 Q. So just spell it out, what is it?  
 22 A. I would say E-R-M-E-S.  
 23 Q. Almost like the scarf, without the H?  
 24 A. Without the H.  
 25 Q. Okay. The pieces of paper that he gave to

1 you with his hours and the names of the people that  
 2 worked, what became of them?  
 3 A. Those usually are entered into the --  
 4 Q. No, I understand that, I understand that  
 5 you entered them onto the spreadsheets, the data  
 6 that's on the pieces of paper.  
 7 A. Yes.  
 8 Q. But I just want to know what happens to  
 9 the pieces of paper themselves.  
 10 A. I actually, I should have a copy of those  
 11 as well.  
 12 Q. Okay.  
 13 A. Like the actual paper.  
 14 Q. Okay.  
 15 A. Yeah, I should have that. If this is of  
 16 interest, I can.  
 17 Q. So, I'm asking you to produce the  
 18 spreadsheets.  
 19 A. Okay.  
 20 Q. And the original papers that were  
 21 submitted to you or the photocopies that you have of  
 22 those original papers.  
 23 A. Okay.  
 24 Q. Reflecting the hours and names of workers  
 25 for Hondu.

1 A. Okay.  
 2 Q. Then the third person you mentioned was  
 3 A&G Mechanical.  
 4 A. Yes.  
 5 Q. They did your plumbing work?  
 6 A. Yes. This is, they are easier. I mean,  
 7 they are kind of like, they don't work for me, they  
 8 don't come. I don't have use for day by day  
 9 plumbing.  
 10 Q. Did you bring with you today any records  
 11 related to the A&G --  
 12 A. If think I did, if not that was sent -- if  
 13 not I can reproduce that, okay. But this is  
 14 something that was sent or at least it was submitted  
 15 but again, if we don't have -- I don't see it here  
 16 with me.  
 17 Q. Okay. Are your payments to A&G  
 18 Mechanical, do they appear on the --  
 19 A. Yes, it's there.  
 20 Q. -- QuickBooks report that you have in  
 21 front of you here today?  
 22 A. Yes. Yes.  
 23 Q. Okay. Now, were there any materials that  
 24 you were required to purchase in order to repair the  
 25 June 2014 water loss?

1 A. Yes.  
 2 Q. What materials were they?  
 3 A. It's a lot of things. I mean, this is  
 4 like Home Depot type of things. In most cases I  
 5 don't have really...  
 6 Q. What -- do you -- what I'm getting at then  
 7 is do you have any records of the materials  
 8 purchased that you needed to repair the June 2014  
 9 water loss?  
 10 A. I can produce that, yeah.  
 11 Q. Okay. But you don't have them with you  
 12 today?  
 13 A. No.  
 14 Q. So, we request that you produce those  
 15 records.  
 16 A. Okay.  
 17 Q. Okay. Let me see, number 12 is  
 18 photographs, you already mentioned that you had a  
 19 problem getting the photographs together.  
 20 A. Yes.  
 21 Q. But you will --  
 22 A. I will make the utmost effort to produce  
 23 that.  
 24 Q. Okay.  
 25 A. Because we did --

1 Q. Number 13 I think we mostly just spoke  
 2 about, right, these are records, canceled checks,  
 3 credit card receipts, cash receipts related to the  
 4 repair of the damage. Those are things that you  
 5 didn't bring with you here today?  
 6 A. Yes.  
 7 Q. Okay. But you have those back at your  
 8 office?  
 9 A. Yeah. All we can produce because I have  
 10 all of them, all the statement from the related  
 11 credit card, so they are...  
 12 Q. Okay.  
 13 A. We can reproduced them.  
 14 Q. So, I'm requesting that you do that and  
 15 you get those documents over to me.  
 16 A. Okay.  
 17 Q. Now, number 14 requests records of any  
 18 lease of the 414 Jackson Avenue property. Was there  
 19 any lease at any time that you were involved with?  
 20 A. No, I just bought the place fair and  
 21 square.  
 22 Q. Okay. You never leased it out?  
 23 A. No.  
 24 Q. Number 15 is related and that asks for  
 25 information concerning any tenant occupancy and am I

1 correct in assuming that there were no tenants in  
 2 the 414 Jackson Avenue property during your period  
 3 of ownership?  
 4 A. No. The tenant was, I was the tenant, if  
 5 I could call myself a tenant.  
 6 Q. Well, you own the property.  
 7 A. Yes.  
 8 Q. Right?  
 9 A. Exactly.  
 10 Q. So, you're not a tenant, right?  
 11 A. But that's not my primary resident.  
 12 Q. I understand that. But you can't be the  
 13 tenant if you're the owner too, at least maybe Ed  
 14 could confirm that for me.  
 15 MR. LEAVITT: No comment.  
 16 BY MR. MEEHAN:  
 17 Q. Number 16, 17, and 18 asks for water,  
 18 electric and heating and gas bills for the 414  
 19 Jackson Avenue property. Let me just put a frame on  
 20 this. The deed indicates that you bought the  
 21 property as of February 7, 2014, is that correct?  
 22 A. Yes. Yes.  
 23 Q. Okay. Do you still own the property?  
 24 A. No.  
 25 Q. So you sold it when?

1 A. December of '14.  
 2 Q. Okay. So, all of these 16, 17 and 18  
 3 we're talking about from February of 2014 through  
 4 December 2014 when you sold the property, okay?  
 5 A. Yes, and some are actually on the  
 6 QuickBooks, but I started the QuickBooks listing  
 7 from the seven, which is just about the time when I  
 8 start paying for the damage of the -- I should have  
 9 started actually from January, and which that's  
 10 actually what I'm going to end up doing, kind of  
 11 going from January. Because the records actually  
 12 are, you know...  
 13 Q. You need them for taxes, right?  
 14 A. Yeah, '14 is filed, so that's it. Those  
 15 are the records.  
 16 Q. Okay. But I mean, the 414 Jackson Avenue  
 17 property had electric, right?  
 18 A. Yes.  
 19 Q. Okay. So, did you get electric bills?  
 20 A. Sure.  
 21 Q. Every month?  
 22 A. Yeah. Well, even here because I got it  
 23 all the way until I sold it, so if we go and check  
 24 the record I paid from the Concept, give me a  
 25 second, here, United Illuminating, that's like a

1 thing that's electrical. Then we have, you can see  
 2 like but that's the water of Bridgeport Aquarium,  
 3 yeah, it's there. So, I can again...  
 4 Q. Okay. So, did you keep your electric  
 5 bills for --  
 6 A. Yes.  
 7 Q. -- the 414 Jackson Avenue property?  
 8 A. Yes.  
 9 Q. All right. You need those because they  
 10 help you on taxes, right?  
 11 A. Yes.  
 12 Q. Okay. So, we're asking for the electric  
 13 bills for that property.  
 14 A. Okay.  
 15 Q. For the period of your ownership. Same  
 16 thing with respect -- what kind of heat was in  
 17 there, was that oil or gas?  
 18 A. Gas.  
 19 Q. Gas. So, was that also United  
 20 Illuminating or is there somebody else?  
 21 A. Now, the gas wasn't really there because,  
 22 okay, when I took over, I think the gas was  
 23 disconnected because I remember I was there actually  
 24 waiting for them almost over night for it to be  
 25 connected very, very early in the morning. So, I'm

1 not sure so sure I have it all the way from  
 2 February, okay, but I think just around April.  
 3 Q. Okay.  
 4 A. It starts going. But I will get you  
 5 whatever I have.  
 6 Q. Okay. And was there a different system in  
 7 the house?  
 8 A. No.  
 9 Q. The house was always gas?  
 10 A. Gas.  
 11 Q. Okay. So, when you're saying that it was  
 12 disconnected, you mean that somebody had shut off  
 13 the gas?  
 14 A. Yes.  
 15 Q. So, even through the winter was there any  
 16 sort of heating in the house?  
 17 A. Well, or that or I had to change it to my  
 18 name, so I didn't pay.  
 19 Q. Okay.  
 20 A. Okay.  
 21 Q. All right.  
 22 A. So, that's it.  
 23 Q. But you say you have that from April --  
 24 A. Yes.  
 25 Q. -- going forward?

1 A. At one point I remembered somebody from  
 2 the gas company came, I had to be there, he  
 3 connected, he did something there.  
 4 Q. Okay.  
 5 A. Then heat was generated.  
 6 Q. But you have bills --  
 7 A. Yeah, I should.  
 8 Q. -- for that?  
 9 A. Yeah.  
 10 Q. Okay. So, we're also requesting those  
 11 bills. There's, I see this is, what was this  
 12 Bridgeport or New Haven?  
 13 A. New Haven.  
 14 Q. This is New Haven?  
 15 A. What?  
 16 Q. 414 Jackson Avenue?  
 17 A. No. No. It's Bridgeport, I'm sorry.  
 18 Q. Okay. So, there was a water service there  
 19 right?  
 20 A. Aquarium.  
 21 Q. Okay. So, how often did Aquarium bill  
 22 you?  
 23 A. You know, I don't know. Maybe once a  
 24 month, may be every two months, it looks like.  
 25 Q. Okay.

1 A. Yeah, because I see it, yeah.  
 2 Q. Okay. So, also your Aquarium bills for  
 3 the same time frame.  
 4 A. Okay.  
 5 Q. Then in 19 we also refer to photographs  
 6 again, but that's the same category that is back on  
 7 your computer, right, that needs to be taken off?  
 8 A. Yeah.  
 9 Q. Now, after you purchased the property in  
 10 was it February of 2014, were you doing work on the  
 11 property?  
 12 A. No, the property was kind of pretty much  
 13 set, so there was no need to do anything like.  
 14 Q. Okay.  
 15 A. Maybe small thing here and there, but not  
 16 something significant. Just maybe like some  
 17 landscaping or just to beautify the place.  
 18 Q. Okay. So, during the period of your  
 19 ownership had you taken out any kind of permits to  
 20 do any work on the property?  
 21 A. No.  
 22 Q. When the damage occurred, did you take out  
 23 any permits?  
 24 A. No.  
 25 Q. Did you have an occasion to obtain a

1 certificate of occupancy for the property?  
 2 A. No.  
 3 Q. Okay. So, with respect to number 20 and  
 4 21 on the list, you're saying that there's just no  
 5 documents that you have?  
 6 A. No.  
 7 Q. Okay. Now, I understand that at the time  
 8 these two water losses took place the property was  
 9 listed for sale, right?  
 10 A. Yes.  
 11 Q. Eventually you did sell it, right?  
 12 A. Yes.  
 13 Q. Okay. So, do you have listing agreements?  
 14 A. Yes. Well, I had -- yes, definitely.  
 15 Q. At least one listing agreement?  
 16 A. Yeah, well, I always worked with same guy.  
 17 Q. Okay.  
 18 A. So...  
 19 Q. So, when was this property listed?  
 20 A. Just about prior to the first damage so  
 21 that really pushed us, kind of, we had to hope that  
 22 nobody is going to come see it and as we fixed the  
 23 first damage, unfortunately we had the second one.  
 24 Q. Okay. So, you're saying if the first  
 25 damage occurred in May of 2014.

1 A. Yeah.  
 2 Q. Is that when it was listed, in May of  
 3 2014?  
 4 A. Maybe, few, you know, few weeks earlier or  
 5 just like about beginning of May.  
 6 Q. Okay.  
 7 A. Just about that time.  
 8 Q. At the time you listed it, did you enter a  
 9 listing agreement with your person that you worked  
 10 with, the broker?  
 11 A. Yeah.  
 12 Q. Okay. Who was that?  
 13 A. Dwight.  
 14 Q. Is he with a real estate firm?  
 15 A. Yeah. I think it's called, I think,  
 16 almost June. But I'm not so sure I just know him as  
 17 Dwight.  
 18 Q. Okay.  
 19 A. I can ask.  
 20 Q. But you still have the listing agreement  
 21 back at your office?  
 22 A. I should have, yes.  
 23 Q. Okay. Because when you sold the property  
 24 you must have had some sort of file from when you  
 25 sold it too?

1 A. Yeah.  
 2 Q. You had to pay a broker when you sold it?  
 3 A. Yes.  
 4 Q. Okay. Was it Dwight that found the buyer  
 5 for your property?  
 6 A. Yes. Yes.  
 7 Q. Okay. So, we're requesting that  
 8 production of the listing agreement that was in  
 9 effect at the time you sold it. Do you know how  
 10 long the period was on the listing agreement that  
 11 you had listed it with Coldwell Banker, was it 90  
 12 days, six months or something like that?  
 13 A. I would say 90 days, may be longer. I  
 14 can't really tell you a definite.  
 15 Q. Okay. So, is it possible that you had to  
 16 renew or extend the listing agreement with --  
 17 A. Like since we started?  
 18 Q. Yeah. I mean, looking at it, you say that  
 19 it was listed at least in May of 2014.  
 20 A. Okay.  
 21 Q. It was sold in December of 2014, which is  
 22 a period of seven months and so, that suggests that  
 23 if there was a listing agreement that was entered  
 24 into in May it probably expired before December.  
 25 So, I'm ask for --

1 A. Yes, I got it.  
 2 Q. -- all the listing agreements, you know,  
 3 whether they expired prior to the sale or not.  
 4 A. Okay.  
 5 Q. Okay.  
 6 A. Yeah.  
 7 Q. Okay. Sitting here today you don't recall  
 8 whether it was --  
 9 A. No, not exactly.  
 10 Q. Okay. All right. Now, you brought with  
 11 you today a police report and I take it that's the  
 12 only one there is, right? Just a one page report?  
 13 A. Yes.  
 14 Q. I think you mentioned it in here  
 15 somewhere. Here it is.  
 16 A. No, this is just copies, I'm trying to...  
 17 Q. Okay. Did the police ask you to give any  
 18 kind of statement in addition to this report?  
 19 A. No, not that I recall.  
 20 Q. All right. So, why don't we do this.  
 21 (Whereupon, Quitclaim Deed marked  
 22 Defendant's Exhibit 2 for Identification.  
 23 (Whereupon, Release of Mortgage marked  
 24 Defendant's Exhibit 3 for Identification.)  
 25 (Whereupon, May 10, 2014 Water Loss

1 Documents marked Defendant's Exhibit 4 for  
 2 Identification.)  
 3 (Whereupon, Incident Report marked  
 4 Defendant's Exhibit 5 for Identification.  
 5 (Whereupon, Property Loss Notice marked  
 6 Defendant's Exhibit 6 for Identification.)  
 7 (Whereupon, Jimcor Agency Documents marked  
 8 Defendant's Exhibit 7 for Identification.)  
 9 (Whereupon, Capstone Document marked  
 10 Defendant's Exhibit 8 for Identification.  
 11 (Whereupon, 8/19/14 Document marked  
 12 Defendant's Exhibit 9 for Identification.  
 13 (Whereupon, Capstone Document marked  
 14 Defendant's Exhibit 10 for  
 15 Identification.)  
 16 (Whereupon, Document marked Defendant's  
 17 Exhibit 11 for Identification.  
 18 (Whereupon, Document marked Defendant's  
 19 Exhibit 12 for Identification.  
 20 (Whereupon, Financial Log marked  
 21 Defendant's Exhibit 13 for  
 22 Identification.)  
 23 BY MR. MEEHAN:  
 24 Q. So, Mr. Dorel, your main residence is in  
 25 Weston, correct?

1 A. Yes.  
 2 Q. In February of 2014 you indicated that you  
 3 purchased the 414 Jackson Avenue house from  
 4 Mr. Sahar.  
 5 A. Yes.  
 6 Q. Was this an investment property?  
 7 A. Yes.  
 8 Q. So, was the purpose of the purchase to  
 9 market the house and sell it?  
 10 A. Either this or rent it or keep it.  
 11 Q. Okay.  
 12 A. At this particular point I didn't have  
 13 clear of what I'm going to do with it.  
 14 Q. Okay. Exhibit 3 is a release of mortgage  
 15 that's dated December 8, 2014, and it looks like  
 16 it's a release from you to Mr. Sahar of a  
 17 December 6, 2013, morning. Could you tell me what  
 18 that is?  
 19 A. Yes, what happened is -- sorry. He needed  
 20 money to fix the house, so at first I say, okay, I  
 21 lend you the money, okay, so we did that. And when  
 22 he was done with everything, okay, I said, you know  
 23 what, I'll buy the house so, I released the  
 24 mortgage, don't worry, don't pay me back, I'll just  
 25 like keep the house. So, we did the quitclaim

1 rather than going through everything else and that's  
 2 how we ended up, I ended up owning the house.  
 3 Q. Okay. So, how much was the mortgage that  
 4 you released?  
 5 A. I don't remember, 170 something.  
 6 Q. Okay. So, Mr. Sahar was an acquaintance  
 7 of yours?  
 8 A. Yeah, he's a friend.  
 9 Q. Okay. Is he also in construction?  
 10 A. He is actually.  
 11 Q. Okay.  
 12 A. He's way more than I am.  
 13 Q. Okay. At the time you purchased it in  
 14 February 2014, was the house listed for sale?  
 15 A. No. Not -- no, not that I think, no.  
 16 Q. Now, what we have marked as Exhibit 4, are  
 17 the documents that you provided to me earlier  
 18 concerning the May 2014 loss, right?  
 19 A. Yes.  
 20 Q. The first page looks like a stub from a  
 21 check that was paid to you for that loss, right?  
 22 A. Yes.  
 23 Q. Okay. Remember just try to wait until I  
 24 finish my question.  
 25 A. Sorry.

1 Q. The second page of the exhibit looks like  
2 a transmittal letter for the check, is that what it  
3 is?  
4 A. Yeah. Yes. I guess. Let me see.  
5 Q. Okay.  
6 A. Yeah. Yeah.  
7 Q. Okay. The third page is the property loss  
8 notice for the May 2014 loss?  
9 A. Yes.  
10 Q. Do you recognize the signatures or  
11 initials that's on the property loss notice?  
12 A. Uh-huh.  
13 Q. Whose are they?  
14 A. That's mine.  
15 Q. Okay. It looks like there's a couple  
16 letters dated May 14, 2014 where the insurance  
17 broker is acknowledging receipt of claim, is that  
18 what's in here?  
19 A. Yes.  
20 Q. Okay. It looks like there's a second copy  
21 of the property loss notice, right?  
22 A. Uh-huh.  
23 Q. Looks like the last page is the duplicate  
24 of the second page which is the transmittal letter  
25 for the check.

1 A. Yeah. Now can I keep the duplicate or?  
2 Q. I'm going to make a photocopy for you and  
3 give you the whole thing.  
4 A. All right.  
5 Q. Okay.  
6 A. All right.  
7 Q. Now, in connection with the settlement of  
8 the May 2014 loss you signed a document that's  
9 referred to as a sworn statement and proof of loss.  
10 A. I guess.  
11 Q. Let me just see, I might have a copy of  
12 that.  
13 (Whereupon, Sworn Statement and Proof of  
14 Loss marked Defendant's Exhibit 14 for  
15 Identification.)  
16 BY MR. MEEHAN:  
17 Q. I'm going to show you, Mr. Dorel, what's  
18 been marked as Exhibit 14, this is a sworn statement  
19 in proof the loss and some other documents attached  
20 to it.  
21 A. That's for the May incident.  
22 Q. I believe so. If you take a look at it,  
23 let me see, in the first time and origin line  
24 there's a reference to May 10.  
25 A. Yeah, that's what it looks like.

1 Q. That's your signature down at the bottom  
2 of the page?  
3 A. Yes.  
4 Q. Okay. So, this is the agreed amount of  
5 the May 2014 loss, right?  
6 A. Yes.  
7 Q. Okay. Then --  
8 A. By the way, I didn't come up with this.  
9 This is what they came up with, this number.  
10 Q. Okay.  
11 A. Is what the guy from the insurance came up  
12 with.  
13 Q. Right.  
14 A. And he took, that's what I'm saying, it's  
15 really, I don't have much to say. I can claim  
16 \$60,000 they just do whatever they want.  
17 Q. The pages that are attached to it, appear  
18 to be the insurance company's calculation as to how  
19 they came up with the --  
20 A. Yeah.  
21 Q. -- \$2,916.64 net amount of your loss.  
22 A. Uh-huh.  
23 Q. Is that information that they shared with  
24 you when they were asking you to sign this proof of  
25 loss?

1 A. They shared with me? They just shove it  
2 to me and say that's what he give me.  
3 Q. They showed it to you?  
4 A. Yeah.  
5 Q. Okay.  
6 A. Very nice of them.  
7 Q. So, did you look at this document or their  
8 calculation before you signed the proof of loss?  
9 A. You know what, honestly no. I mean, I  
10 just kind of like said, okay, if this is what  
11 they're giving me.  
12 Q. Okay.  
13 A. I wouldn't really go...  
14 Q. Who is it that dealt with the insurance  
15 company with respect to the May --  
16 A. David.  
17 Q. David?  
18 A. Yeah.  
19 Q. Okay. So, you didn't personally have any  
20 --  
21 A. No, Dave does a lot of things, okay, for  
22 me. Okay. He was a -- he is the guy who runs the  
23 office, okay. So, supervise everything, but I'm  
24 doing too many things to do everything. He does a  
25 lot of the office, back office let's call it. So he

1 would initiate a lot of the things and then I would  
 2 go over and take it from there.  
 3 Q. Okay. So, when you say at one point  
 4 you're telling me that you have several businesses,  
 5 you have an IT business?  
 6 A. Yes.  
 7 Q. Or what is it IT or telecommunications?  
 8 A. IT, yes.  
 9 Q. IT?  
 10 A. Yeah, IT, telecommunications fall under IT  
 11 yes.  
 12 Q. Okay. What's the name of that business?  
 13 A. A+ Systems.  
 14 Q. A+ Systems.  
 15 A. Okay.  
 16 Q. And then you have the construction related  
 17 business, right?  
 18 A. Yes.  
 19 Q. Then you had a food business or restaurant  
 20 or something like that.  
 21 A. Yes.  
 22 Q. That you're not in any more.  
 23 A. I am out.  
 24 Q. Okay. So, when you say David would handle  
 25 the back office, what were you referring to, the

1 back office of all your businesses?  
 2 A. Yes.  
 3 Q. Okay. So, is the IT business still on  
 4 going on?  
 5 A. Yes, but not as much as we used to do.  
 6 Q. Okay. So, in 2014, did you still have the  
 7 IT business going?  
 8 A. The IT business yeah, but it's very  
 9 it's -- yes. I always have it so I get royalties,  
 10 so everything. I still do. I invented voicemail 25  
 11 years ago, so there's some residuals coming from  
 12 that. Not much, but still there. So...  
 13 Q. Okay.  
 14 A. But then I'm kind of doing this other  
 15 crazy stuff.  
 16 Q. Okay. So, Mr. O'Hara would be working the  
 17 back office for both the IT business and your  
 18 construction business.  
 19 A. Yes. Yeah.  
 20 Q. He's the one that must have talked with  
 21 the insurance company concerning the May 2014 claim.  
 22 A. Yeah. When there is something like this,  
 23 then he initiate, he writes the insurance, file a  
 24 claim, and then, you know, they came, I was there  
 25 when they came for the first time, they took

1 pictures, they did the report and eventually say  
 2 okay, this what we are paying for damage.  
 3 Q. Okay.  
 4 A. Okay.  
 5 Q. Yeah. We'll just put that here. Well,  
 6 actually, before I put it away. The third page of  
 7 the document refers to or describes the --  
 8 A. The third page?  
 9 Q. Yeah. Well, actually it's the third page  
 10 of the exhibit, but it's page number two down at the  
 11 bottom.  
 12 A. Okay.  
 13 Q. That's something on Capstone IESG  
 14 letterhead. The top half of the page that describes  
 15 the insurance company's calculations of what was  
 16 damaged in May of 2014, right?  
 17 A. Yes.  
 18 Q. This was a basement room primarily that  
 19 got water damage in it, right?  
 20 A. Yes.  
 21 Q. There's an R&R laminate simulated wood  
 22 flooring.  
 23 A. Yes.  
 24 Q. What happened in -- was there some sort of  
 25 wood flooring in the basement room at that point in

1 time?  
 2 A. Yes.  
 3 Q. Okay. So, that was damaged in May of  
 4 2014?  
 5 A. Yes.  
 6 Q. So, this description number one, R&R  
 7 laminated simulated wood flooring would be referring  
 8 to remove and replace the wood flooring?  
 9 A. Yes.  
 10 Q. Then there's item two, refers to  
 11 baseboard, was the baseboard in the basement damaged  
 12 in the May 2014 incident?  
 13 A. Like, you know, yeah. I don't know why  
 14 they mention it, but it's like the floor and then  
 15 there's a baseboard made for. Just like this one.  
 16 Q. Okay.  
 17 A. Similar to this.  
 18 Q. Okay. So, there would have been water of  
 19 some sort that damaged the baseboard all around the  
 20 room.  
 21 A. Yes.  
 22 Q. The water also got into the sheetrock, I  
 23 guess this basement room is sheetrocked, right?  
 24 A. Yes.  
 25 Q. Okay. Or at least part of it is?

1 A. It was a finished basement.  
 2 Q. Finished basement?  
 3 A. Yeah.  
 4 Q. Okay. But there's also utilities down  
 5 there too, right? Because if I look in this diagram  
 6 here, it's hard to read.  
 7 A. Yeah.  
 8 Q. But I think there's a reference to a  
 9 utility closet there.  
 10 A. Yeah. The end of the basement there is  
 11 like a small utility room that has the boiler,  
 12 actually the boiler and maybe a water tank, kind of  
 13 like the gas pipes is coming there.  
 14 Q. Okay.  
 15 A. Like, you know, small utility room for  
 16 private house.  
 17 Q. Okay. So, at least in the part that was  
 18 finished, all the sheetrock, at least along the base  
 19 of it --  
 20 A. Yeah.  
 21 Q. There was water? It got hit by the water?  
 22 A. The first damage?  
 23 Q. Yes.  
 24 A. But it was kind of limited damage, okay.  
 25 It wasn't really, again, I'm trying to compare the

1 two cases.  
 2 Q. Right.  
 3 A. In the second case the water came to be  
 4 maybe three or two and a half feet high.  
 5 Q. Okay. So, item four on this page of the  
 6 Exhibit 14 refers to R&R drywall up to two feet  
 7 tall.  
 8 A. Uh-huh.  
 9 Q. That's a reference to removing the bottom  
 10 two feet of the sheetrock?  
 11 A. Yes.  
 12 Q. In the basement room?  
 13 A. Yes.  
 14 Q. Okay. Then replacing it. Then the rest  
 15 of the things appear to be other cosmetic type  
 16 repairs for the basement room, right?  
 17 A. Yes.  
 18 Q. So, let me show you Exhibit 5 now. You  
 19 can put that over there unless you got to look at it  
 20 for some reason.  
 21 Exhibit 5 is the police report from the  
 22 June 20, 2014 --  
 23 A. Okay.  
 24 Q. -- incident right, yes?  
 25 A. Yes.

1 Q. Okay. It is?  
 2 A. I'm sorry, yes, I didn't know you were  
 3 waiting for me.  
 4 Q. The other thing that I forgot to tell you  
 5 is that the court reporter needs a verbal response  
 6 to a question.  
 7 A. Okay.  
 8 Q. Because nods of the head and that sort of  
 9 thing.  
 10 MR. LEAVITT: How about yes or no.  
 11 MR. MEEHAN: Yes or no will work.  
 12 BY MR. MEEHAN:  
 13 Q. So, how did the June 20, 2014 incident  
 14 occur? In your own words just describe what you saw  
 15 and what happened.  
 16 A. What I saw?  
 17 Q. What you saw.  
 18 A. I saw after the fact.  
 19 Q. After the fact, right.  
 20 A. So, when I came it was like completely  
 21 flooded.  
 22 Q. You got called from somebody?  
 23 A. Yes.  
 24 Q. How did that happen?  
 25 A. How did I get a call?

1 Q. Yes.  
 2 A. All right. It was a ring and I answered  
 3 the call. I forgot even by whom, I think it was by,  
 4 oh, Dwight, my, the real estate guy.  
 5 Q. Okay.  
 6 A. He called me to say listen, something is  
 7 wrong, I mean I have to come see it. So, I came  
 8 down and then, you know, it was like almost I mean  
 9 it was a swimming pool.  
 10 Q. What was Dwight doing there?  
 11 A. He was the real estate.  
 12 Q. Was he showing it to somebody and he  
 13 discovered the loss, is that what happened?  
 14 A. Well, it was his property, so he would be  
 15 there very frequently.  
 16 Q. Okay.  
 17 A. Okay. Either to prepare showing or either  
 18 to, you know, to kind of say, listen, they have to  
 19 cut the grass. He's a real estate guy, I don't  
 20 really know.  
 21 Q. Was he showing it to somebody at the time?  
 22 A. No.  
 23 Q. You just don't know?  
 24 A. No. This weekend, no, he didn't because  
 25 it wasn't really presentable.

1 Q. So, Dwight called you and told you that  
2 you got to get down here.  
3 A. Yeah.  
4 Q. So, you went down there, right?  
5 A. Yes.  
6 Q. You saw water in the basement?  
7 A. Well, I saw the break in, I saw water in  
8 it and was like, I didn't know what happened,  
9 seriously, I couldn't really -- I didn't know that  
10 there is even a value of those pipes that kind of  
11 got broken and stolen. So, we called the police is  
12 they immediately told me, I mean, the policeman told  
13 me, okay this is what happened. He said people are  
14 doing this for \$200, they would break and steal the  
15 copper pipe.  
16 Q. So, when you got there, what did you see?  
17 In other words, you walked into the house, I assume  
18 how did you get in the house? Did you go in the  
19 front door or did you go right in the basement?  
20 A. No, not the front door, the basement is  
21 obviously down.  
22 Q. Yes.  
23 A. Dave was there too already and then he  
24 stop, I mean, somehow managed to stop the flow of  
25 the water, so, it was actually after the first

1 impact so, we were there.  
2 Q. Okay. So, there was a shut off valve for  
3 the water coming into the house?  
4 A. Yes, I think I so. I'm not really that  
5 technical in that aspect, but the water stopped  
6 flowing. It was high enough to -- I mean, at least  
7 like two inches or more.  
8 Q. Okay. So, you came in through the front  
9 door, was there any damage upstairs?  
10 A. There was, yeah.  
11 Q. When I say upstairs, I mean the main floor  
12 of the house.  
13 A. Yeah, but not something that is, well, a  
14 lot of -- okay, apparently there were other pipes  
15 for the heating system, the regular or whatever  
16 those were broken as well. So, most of the damage  
17 was really contamination of the walls as far as  
18 paint.  
19 Q. Okay.  
20 A. But not something that I would say, we  
21 need to just paint, not everything but we need to  
22 paint some aspects of the house.  
23 Q. Okay. So, did you call the police or did  
24 --  
25 A. Yes, I did.

1 Q. You did?  
2 A. I did, yes.  
3 Q. At that point in time, had you determined  
4 that there had been a theft, somebody broke in and I  
5 mean, is that what you determined right away?  
6 A. No. No. I didn't know -- I saw the  
7 break-in, okay, I saw, you know, somehow they broke  
8 in through a window, but I didn't make the  
9 connection of them vandalizing or doing something  
10 that triggered this whole thing.  
11 Q. Okay.  
12 A. So, I called the police and then, you  
13 know, I became smarter after this.  
14 Q. Okay. So, you spoke with the policeman  
15 when he came out to the house?  
16 A. Yes.  
17 Q. All right. What did he tell you about how  
18 it happened?  
19 A. Well, he --  
20 Q. Did he investigate?  
21 A. Yeah, he had a little walk around and he  
22 said, okay look this is how they came from.  
23 Q. What does that mean? How did they get  
24 into the house?  
25 A. Apparently from the kitchen window.

1 Q. Okay.  
2 A. Okay. And then they said this is pretty  
3 common in Bridgeport.  
4 Q. Okay.  
5 A. They come and they looking for pipes, for  
6 copper pipes. They went down to the basement and  
7 they just broke the main pipe and then kind of like  
8 immediately flee because, I mean water started --  
9 well, I'm assuming I wasn't there to really, I don't  
10 have any video, but once you break the pipe, nobody  
11 was really there to shut the valve off, so, they  
12 kind of left.  
13 Q. Okay. So, the most obvious damage was in  
14 the basement I take it then, right?  
15 A. Yes.  
16 Q. All right. Now, the report indicates that  
17 he spoke to the owner and then he states that  
18 "Around 1,000 hours today his plumber discovered  
19 break in and damage."  
20 A. When? 1,000 hour?  
21 Q. Yeah, probably meaning ten.  
22 A. Oh, ten o'clock.  
23 Q. Does that make sense to you?  
24 A. Say it again.  
25 Q. I'm just reading from the section down

1 here.  
 2 A. Yeah, I guess. Look, I can guess yeah  
 3 that's probably what happened. I don't know.  
 4 Q. So, was at that time, your plumber, was  
 5 that A&G or did you have some other plumber?  
 6 A. No. When the police was there, maybe he  
 7 referred to David as my plumber.  
 8 Q. Okay.  
 9 A. But I can't really, not the plumber the  
 10 A&G wasn't really there.  
 11 Q. Okay.  
 12 A. He would have called.  
 13 Q. Okay. So, when you say Dave, this might  
 14 have been Dave O'Hara?  
 15 A. Yeah.  
 16 Q. Okay. It's possible Dwight called Dave  
 17 O'Hara first?  
 18 A. Yes, most likely. Or he called me and I  
 19 called Dave. I don't know. I don't recall exactly.  
 20 Q. Okay. But the timing being around ten  
 21 o'clock in the morning does that sound around right?  
 22 A. Yeah, just about.  
 23 Q. Okay. So, it says that the damage, that  
 24 the water severely damaged a wooden floor. So, at  
 25 that time, had the May damage been repaired?

1 A. Yes, definitely.  
 2 Q. Okay.  
 3 A. We switched most of the floor from the May  
 4 damage, okay, and when we came the whole floor was  
 5 floating, so, we decided not to put the same  
 6 flooring again, and we went with a stone floor, real  
 7 tiles.  
 8 Q. Okay. So, before the May damage, there  
 9 was some sort of wood laminate flooring down?  
 10 A. Yes.  
 11 Q. You're saying that you replaced that with  
 12 another type of wood --  
 13 A. Well, no. No.  
 14 Q. -- floor?  
 15 A. Excuse me, sorry.  
 16 Q. Yeah.  
 17 A. So, okay the May damage, okay, we replaced  
 18 some of the floor, maybe 75 percent of the floor,  
 19 and then the second damage we decided to take the  
 20 old floor out because I mean there was no reason to  
 21 keep it. I mean, it was all moldy, so we took  
 22 everything out and we put tile floor all over.  
 23 Q. Okay.  
 24 A. Porcelain.  
 25 Q. So, at the time of the June 20, 2014 loss,

1 there was a wood floor down in the basement.  
 2 A. Yes.  
 3 Q. That was on top a concrete slab, right?  
 4 A. Yes.  
 5 Q. So, was that some sort of engineered wood?  
 6 A. Yes.  
 7 Q. Do you have invoices or receipts for the  
 8 purchase of that flooring?  
 9 A. Should have, yeah.  
 10 Q. Okay. I request that you produce those  
 11 invoices or receipt for the wood flooring that was  
 12 purchased after May 10 of 2014. There's also a  
 13 sentence that says, "Aniel states that the suspect  
 14 entered through a basement window in the rear of the  
 15 home which is now secured with plywood." What is  
 16 that in reference to?  
 17 A. You know, I didn't know where they came  
 18 from. So, I said listen, maybe he came from there.  
 19 Q. Okay. So, prior to this incident, was  
 20 there a window that was broken that had been secured  
 21 with plywood?  
 22 A. No. No. It was secured after it was  
 23 broken.  
 24 Q. Okay. So, after the loss was discovered  
 25 and had before the policeman got there, somebody put

1 plywood in the window?  
 2 A. No.  
 3 Q. No?  
 4 A. No, after it was broken then we secured it  
 5 with a piece of plywood, covered it with plywood.  
 6 Q. Okay. The next sentence says, "He says  
 7 that the home was last inspected on June 13, 2014  
 8 and the break took place between then and 1,000  
 9 hours today." Is that something that you told the  
 10 policeman?  
 11 A. I guess, otherwise I don't see how he  
 12 could guess something like this.  
 13 Q. Okay. Just let me see, Exhibit No. 6 is  
 14 the notice that you gave to the insurance company  
 15 about the June 20, 2014 loss, right?  
 16 A. Yes.  
 17 Q. That's initialed by you down at the  
 18 bottom, right?  
 19 A. Yes.  
 20 Q. Then the insurance broker acknowledged  
 21 receipt of your notice and that's Exhibit 7.  
 22 A. Yes.  
 23 Q. Okay. Then Exhibit 8 is a letter that you  
 24 got from the insurance broker sometime after the  
 25 loss was reported, right?

1 A. Yes.  
 2 Q. Okay. Now see, between the date that you  
 3 purchased the property in February of 2014 and  
 4 June 20, 2014, you weren't living in the property,  
 5 right?  
 6 A. No.  
 7 Q. You didn't have a tenant in the property,  
 8 right?  
 9 A. No.  
 10 Q. There wasn't anybody that resided in the  
 11 property, right?  
 12 A. Not resided but, we were there fairly  
 13 very, very, very, very frequently.  
 14 Q. Okay. You mentioned that you were  
 15 prepping the property for sale, right?  
 16 A. Yes.  
 17 Q. Doing touch up things that had to be done  
 18 to prep it for sale.  
 19 A. Yes. But that wasn't really the initial  
 20 thought. Okay, I thought of keeping it again.  
 21 Q. Right.  
 22 A. So, but that's things that involved and  
 23 the prospect changed.  
 24 Q. So, at some point you decided that you  
 25 wanted to sell it, right?

1 A. At one point, yes.  
 2 Q. Because you had it listed, right?  
 3 A. Yes.  
 4 Q. Okay. That's why you got the real estate  
 5 broker involved because you wanted to sell the  
 6 property, right?  
 7 A. Yes.  
 8 Q. Okay. At the time that the property was  
 9 listed, there was nobody living in the property,  
 10 right?  
 11 A. No.  
 12 Q. So, during the listing period the property  
 13 was, there was nobody living there, right?  
 14 A. Right.  
 15 Q. Okay. Was the house furnished?  
 16 A. Minimal.  
 17 Q. Okay.  
 18 A. Minimal.  
 19 Q. What do you mean by minimal?  
 20 A. Well, we had the full kitchen, we had the  
 21 bath, we had the minimal. Wasn't really, I mean, we  
 22 didn't have TV for instance. We didn't have...  
 23 Q. So, you didn't have any cable internet  
 24 hook up there?  
 25 A. No.

1 Q. All right. You didn't have a TV and you  
 2 didn't have any need for a cable, I don't know who  
 3 the cable provider is in Bridgeport, Comcast or  
 4 somebody like that?  
 5 A. Yeah, maybe.  
 6 Q. There's no cable account then, right?  
 7 A. No.  
 8 Q. Were the bedrooms furnished?  
 9 A. Well, we had the mattress but very like,  
 10 what do you call them, inflated mattress in one of  
 11 the bedrooms, but no, I wouldn't say it was  
 12 furnished per se.  
 13 Q. Okay. So, there was nobody living there,  
 14 it wasn't like somebody was keeping their clothing  
 15 there, right?  
 16 A. No.  
 17 Q. There weren't linens and things like that  
 18 there for beds?  
 19 A. No, not for beds.  
 20 Q. Was there a refrigerator in this?  
 21 A. Yes.  
 22 Q. Okay. So, when you sold the house, you  
 23 sold it with a fridge?  
 24 A. Everything, yeah.  
 25 Q. Stove?

1 A. Yeah.  
 2 Q. Microwave --  
 3 A. Yes.  
 4 Q. -- type of thing?  
 5 A. Yes.  
 6 Q. Was the house stocked with food?  
 7 A. Minimal just like because you know,  
 8 caterer or somebody who comes in like real estate  
 9 who comes would come in.  
 10 Q. Like on a an open house type thing?  
 11 A. Yeah.  
 12 Q. So, for an open house you would have  
 13 bagels or some sort of fruit there?  
 14 A. Yeah something like that, yes.  
 15 Q. Coffee maybe?  
 16 A. Coffee maybe.  
 17 Q. Okay. But apart from that, there wasn't  
 18 anybody living in this house, right?  
 19 A. No.  
 20 Q. But you say --  
 21 A. What is living? The question is what is  
 22 living? If people there like four hours a day  
 23 sometimes is that considered living? I mean, we are  
 24 living all the time. The question is in what  
 25 capacity.

1 Q. Okay. Well, that's a good point. Let me  
2 ask you a question, what was the purpose of your  
3 workers being at the house?  
4 A. Well, at the point where we decide, okay,  
5 look, at the point where we decide to sell it, okay,  
6 then the real estate say look, it could be  
7 beneficial if we do this, if we do this, if we do  
8 this, so we were there to do this and this. We  
9 actually had like a 20 point item of what could  
10 increase the chances to sell the place to get even  
11 more. Actually we got a very good price for the  
12 house because of all the little things that he  
13 recommended. Do the landscaping, improve the  
14 drainage. There was like a lot of little things  
15 that had nothing to do with the way the house I  
16 bought it. I was, look I was kind of new to this.  
17 So, everything was a feel by the broker. If you had  
18 the drain, I mean, going to -- there is like a  
19 little brook at the end of the property, so, we had  
20 to do this. We had to all sorts of little things.  
21 Q. Did the broker give you a list or  
22 something like that?  
23 A. A recommended list of what could be  
24 beneficial if we do that.  
25 Q. Did you keep that list?

1 A. If I can -- I don't know.  
2 Q. Well --  
3 A. Maybe.  
4 Q. I ask that you look through your records.  
5 A. To see if I have a list.  
6 Q. To see if you have that list.  
7 A. Okay.  
8 Q. That would be like a punch list type of  
9 thing for things for you to improve the sale of  
10 house, right?  
11 A. Kind of like, yeah. If do you this --  
12 first of all, there were like a few things that even  
13 though everything was kind of new, that needed to be  
14 repaired immediately, okay. Like a tile was broken  
15 in the bathroom. Stuff like this.  
16 Q. Okay. So, in order to follow your real  
17 estate broker's advice you had your men go to the  
18 house to work on it, right?  
19 A. Yes.  
20 Q. To try and work off the things on that  
21 punch list, right?  
22 A. Yes.  
23 Q. So, that was the reason that they were at  
24 the house, right?  
25 A. That was reason they were living in the

1 house, breathing.  
2 Q. Breathing in the house?  
3 A. Yes.  
4 Q. But I mean their purpose for being there  
5 was to do work on the house, right?  
6 A. Yeah.  
7 Q. Okay. But they had their own homes where  
8 they would reside, right?  
9 A. Yes.  
10 Q. And it's not like your workers were  
11 residing at --  
12 A. No. But there was a case where somebody  
13 needed to stay overnight I said, okay, stay. He  
14 didn't want to go back to his place in New Jersey so  
15 he stayed overnight.  
16 Q. So, who was that?  
17 A. One of the guys.  
18 Q. Do you know his name?  
19 A. No.  
20 Q. Okay. So, you gave him permission to stay  
21 overnight in the house?  
22 A. Yeah.  
23 Q. Do you know when that happened? Do you  
24 know when it occurred that he stayed overnight?  
25 A. Well, everything stayed, like started

1 after we decided to sell the house. So, kind of  
2 just like before the first damage, okay, this is if  
3 I recall back and this is the kind of stuff I can  
4 trace because, as you said, if we have a sales  
5 agreement with the broker, it probably has a date on  
6 it. So, I can kind of, you know, trace that back  
7 and...  
8 Q. Okay. Did Mr. Sahar have the house for  
9 sale?  
10 A. No.  
11 Q. Okay. He never got to the point of it  
12 being ready to list?  
13 A. No, I took over the house. You can call  
14 it that he sell it to me, but he wasn't really on  
15 the market by broker ever before. I was the first  
16 one to put it on the market.  
17 Q. Okay. If you don't mind, let's take a two  
18 minute break. Then I'll just get my notes and we'll  
19 try and wrap this thing up. Okay?  
20 A. Sure.  
21 (Whereupon, Off the record at 3:48 p.m.)  
22 (Whereupon, Back on the record at 3:53  
23 p.m.)  
24 BY MR. MEEHAN:  
25 Q. So, back on the record here, let me see,

1 you mentioned that apart from, there's a blow up  
2 mattress in the house there were no beds otherwise,  
3 right?  
4 A. No.  
5 Q. There was no bed linens, no beds?  
6 A. No.  
7 Q. No clothing to speak of in the house,  
8 right?  
9 A. No.  
10 Q. How many bedrooms were there in the house?  
11 A. Three.  
12 Q. Bedrooms. I'm sure there must have been a  
13 living room because most houses have them, right?  
14 A. Yes.  
15 Q. Was there a sofa and chairs and things  
16 like that?  
17 A. Just like folding tables.  
18 Q. Folding tables?  
19 A. Nothing major.  
20 Q. Okay. Is that the desk that you referred  
21 to?  
22 A. Yes.  
23 Q. Okay. So, there was some folding chairs  
24 and a folding table.  
25 A. Yeah.

1 Q. Was that stuff that the broker had put in  
2 there?  
3 A. Most likely. Personally I didn't, but it  
4 was there.  
5 Q. All right. In the kitchen you mentioned  
6 there was a refrigerator and all of the -- utensils,  
7 I suppose, or the kitchen equipment was there,  
8 right, stove?  
9 A. No, we put everything in new. By the way,  
10 there were a lot of furniture there, okay, that we  
11 took out because we didn't like it, so, one day we  
12 brought a dumpster and we like, whoosh.  
13 Q. That was from the house, the prior owner  
14 or something?  
15 A. Yeah.  
16 Q. Okay. So, pretty much the house was empty  
17 then when you were showing it?  
18 A. Some stuff I did like because they were  
19 kind of old, but some of them most like, just like  
20 for the record, okay.  
21 Q. Okay.  
22 A. We emptied, we did this.  
23 Q. In the -- so, when is it that you emptied  
24 the house, do you remember?  
25 A. Not exactly. But before I took over, like

1 I wanted everything out when this February thing  
2 came.  
3 Q. Yeah.  
4 A. I didn't want to have any of the old  
5 stuff. So some of the stuff was dumped, some of the  
6 stuff, very little, I took. If I like a chair or  
7 something.  
8 Q. Okay. So what did you take that for your  
9 own house or --  
10 A. Yeah.  
11 Q. -- storage or something like that?  
12 A. Uh-huh.  
13 Q. Okay. So, let me see, the kitchen you  
14 mentioned there was refrigerator, microwave, stove.  
15 A. Microwave.  
16 Q. Cooktop, I suppose?  
17 A. Yeah. Cooktop, stove microwave on the  
18 stop.  
19 Q. Okay.  
20 A. Fridge, dishwasher, basically that's it.  
21 Q. Okay. Then occasionally there would be  
22 some food for like a showing.  
23 A. Yes.  
24 Q. But otherwise there wouldn't be -- there  
25 was no kitchen china or utensils, pots and pans that

1 type of stuff?  
2 A. Not like for, you know, the purpose that  
3 may be kind of living, okay, let's have a dinner and  
4 we invite people and we have wine glasses, no.  
5 Q. Okay.  
6 A. It was more of like as you referred  
7 before, somebody comes and you want to show them the  
8 house there is some, like a glass of water, want,  
9 you know, maybe juice or something.  
10 Q. Okay. I guess there was no landline  
11 telephone in the house was there?  
12 A. Nobody uses landline any more.  
13 Q. Okay. Except for me.  
14 A. Yeah.  
15 Q. So, there was no landline telephone in the  
16 house?  
17 A. No.  
18 Q. We already, I think you already mentioned  
19 there's no internet connection then, right?  
20 A. No. Not. No.  
21 Q. Nothing live?  
22 A. But if we have to go to internet, I always  
23 have internet. I go on my iPad, so that's right now  
24 here. I know that's not what you're referring to  
25 but...

1 Q. No, I'm referring to somebody having a  
2 cable come into the house so you can watch movies on  
3 television.  
4 A. On Netflix.  
5 Q. Netflix?  
6 A. Netflix you don't need a cable.  
7 Q. Well, okay. So, to your knowledge when  
8 was the last time that somebody resided in the  
9 house? Did Sahar reside in the house?  
10 A. Well, when you refer to reside, it's  
11 like...  
12 Q. Sleeping there regularly, that being their  
13 home.  
14 A. No, I don't think he was at home.  
15 Q. Okay. So --  
16 A. Per what you're referring home, but it was  
17 like my second home. I bought the house, so, for me  
18 it was my second home if you call it. I didn't  
19 reside there. I have another house in West Haven  
20 that I, it's mine, it's empty all the time, it's  
21 mine. If I want to go there for the weekend it's  
22 just by the water I go. If not, it's empty.  
23 Q. Okay. How many weekends did you spend at  
24 the house on Jackson Avenue, on average?  
25 A. Weekend?

1 Q. Well you just mentioned spending weekends  
2 in West Haven.  
3 A. No, to be honest I have never spent the  
4 weekend also in the house in West Haven.  
5 Q. Okay.  
6 A. Seriously, I'm not. I'm serious.  
7 Q. So, then, I take it that you never spent a  
8 weekend in the house in Jackson Avenue in  
9 Bridgeport, right?  
10 A. No, weekend, never.  
11 Q. How many nights did you sleep in the  
12 house?  
13 A. I personally, maybe once, not the entire  
14 night. I stayed very, very late and I came back  
15 very, very early because of this hook up or gas hook  
16 up.  
17 Q. Okay.  
18 A. So, that was my story.  
19 Q. Okay. Why is it that that was so late at  
20 night that that occurred?  
21 A. Because we needed to finish a few things.  
22 It was pressure that we finished, you know, a lot of  
23 like little things that were there to finish.  
24 Q. Okay. So, there were some people working  
25 on the house at that time and you stayed there to --

1 A. Yeah.  
2 Q. -- make sure they were doing it right?  
3 A. We stayed late, we goofed around and, you  
4 know, had some beer and stuff, nothing.  
5 Q. Okay. All right. So, who did you sell  
6 the house to?  
7 A. I don't know. Family. I mean, I wasn't  
8 really involved, you know, how it is, real estate.  
9 Q. Okay. This is something that Attorney  
10 Leavitt provided to me.  
11 (Whereupon, Invoice marked Defendant's  
12 Exhibit 15 for Identification.)  
13 BY MR. MEEHAN:  
14 Q. Could you take a look at that Mr. Dorel,  
15 and I'm going to ask you some questions about it.  
16 On the second page of Exhibit 15 it appears to be,  
17 looks like a QuickBooks type invoice.  
18 A. Yup.  
19 Q. On letterhead of Concept USA, Inc.  
20 A. Yes.  
21 Q. That's your company, right?  
22 A. Yes.  
23 Q. What is the business of Concept USA, Inc?  
24 A. That's real estate you can say.  
25 Q. Okay. When you say real estate, what do

1 you mean by?  
2 A. Like this. Just the stuff, I mean, we buy  
3 property we try to fix it and sell it.  
4 Q. Okay.  
5 A. If we have a property we may rent it out  
6 and basically that's it.  
7 Q. Okay. You're a principal of Concept USA,  
8 right?  
9 A. Yes.  
10 Q. Are there any other principals or is this  
11 a company that you own 100 percent yourself?  
12 A. Yes.  
13 Q. So, that means you own it 100 percent  
14 yourself?  
15 A. Yes.  
16 Q. Okay.  
17 A. Sorry.  
18 Q. So, can you tell me does this invoice  
19 number 10104, does this relate to the June 20, 2014  
20 water damage loss?  
21 A. I'm not so sure to be honest with you. I  
22 don't know how we ended up here. I'm not so sure.  
23 Q. Okay. So, you don't have any knowledge of  
24 this --  
25 A. No.

1 Q. -- invoice?  
 2 A. Look, it's my invoice but I don't know if  
 3 this is -- why would the Concept USA bill to Amiel  
 4 Dorel, it's probably, it's just a fluke.  
 5 Q. Okay. So, this is not part of the water  
 6 damage claim against --  
 7 A. No. No.  
 8 Q. -- the insurance?  
 9 A. No. Sorry. Sorry. There were only like,  
 10 as I mentioned before, those kind of entities that I  
 11 mentioned before, Dave, Hondu, and A&G these are  
 12 them.  
 13 Q. Okay. So, the next page of the document  
 14 is letterhead of David B. O'Hara, LLC.  
 15 A. Yes.  
 16 Q. Can you tell me what this is, this page?  
 17 A. Okay. As I said, because of the  
 18 arrangement with Dave you have to assess, okay,  
 19 what's your contribution because he gets paid, okay,  
 20 whether he does one hour or 100 hours, we have an  
 21 arrangement. So, this is the assessment, okay.  
 22 Like we look, he probably got way more than this,  
 23 but it's fair to say that part of what he got, I  
 24 mean, was allocated. It's hard to explain how it  
 25 works, not hard, but it's different. There is an

1 arrangement of payment, okay. He was there, I think  
 2 he was there, not so sure it was a weekend, but he  
 3 might have been a weekend -- when we called the  
 4 police, it was a weekend so he came on the weekend  
 5 and he stayed all night. So, if we look back I'm  
 6 sure we can trace back.  
 7 Q. Yeah, I don't know. Okay. So, you're  
 8 saying that, correct me if I'm wrong, this June 25,  
 9 2014 document on the letterhead of David B. O'Hara,  
 10 LLC, is an estimate that Mr. O'Hara made of his  
 11 time.  
 12 A. Yes, his time of over the weekend staying  
 13 there, like for many, many, many, many hours.  
 14 That's nothing. I mean, if I had called, these guys  
 15 with the green van it would maybe two or three times  
 16 more.  
 17 Q. So, what is your understanding of what is  
 18 it that Mr. O'Hara was there for the weekend, is  
 19 that it?  
 20 A. No, it wasn't only that. I mean, he came  
 21 after, okay, he wasn't like just like the first  
 22 call, he spent at least 12 or more hours. He came  
 23 afterwards, I mean, after this like Monday, Tuesday,  
 24 all the way every day he had to come there.  
 25 Q. Okay. So, look at the invoice or, is this

1 an invoice?  
 2 A. Not really an invoice. It's just...  
 3 Q. A statement?  
 4 A. Kind of a statement.  
 5 Q. Okay. The first two lines "Emergency pump  
 6 out of basement and set dehumidifiers." That sounds  
 7 like something that is done immediately, right?  
 8 A. Yes, had to be done immediately.  
 9 Q. Okay. The next three lines "Remove and  
 10 disposal of flooring, sheetrock, mold." And  
 11 actually the next line, "Debris." That sounds like  
 12 another phase of the work.  
 13 A. Yeah.  
 14 Q. This removal of damage?  
 15 A. Look, it took some, sorry it took some  
 16 time to pump all the water out, like significant  
 17 amount of water. And then, I mean, we had to  
 18 ventilate, we had to actually, the whole house had  
 19 to be opened. Somebody had to be there and guard  
 20 because we couldn't really keep the house closed. I  
 21 mean, the smell was overwhelming. So, he had to be  
 22 there that's why I'm saying I had been there. The  
 23 neighborhood may be safe, but Dave lives in Milford  
 24 and maybe Bridgeport is not the safest place to keep  
 25 everything open and be all by yourself. So, then

1 you know, once the water was kind of cleared then, I  
 2 mean, Ermes, I mean there was like some  
 3 significance. Had to take all the everything, all  
 4 the sheetrock out.  
 5 Q. When you first discovered the loss, was  
 6 there already mold developing?  
 7 A. I don't know if I even saw that, I'm not a  
 8 mold expert to be honest with you, but I did see  
 9 signature build up of mold maybe the day after.  
 10 Q. Okay, by the way, do you know where  
 11 Mr. O'Hara got the equipment to pump out the  
 12 basement?  
 13 A. Home Depot.  
 14 Q. Okay. Did he rent it or buy it?  
 15 A. No, I rent probably.  
 16 Q. Who --  
 17 A. That's to be honest with you, I have to  
 18 check with him. He didn't take a backhoe and do it.  
 19 I mean, he had some kind of a pump that he did all  
 20 this work with.  
 21 Q. Did he pass those expenses on to you for  
 22 payment?  
 23 A. Well, he has a credit card of mine that  
 24 he's using.  
 25 Q. Okay.

1 A. So, I can again, apart of what I am going  
2 to give is, as you know, itemized list of everything  
3 that was going on.  
4 Q. When you say he has a credit card of  
5 yours, does that mean it's a credit card in the name  
6 of Amiel Dabush Dorel or is it in the name of  
7 Concepts USA or in some other name?  
8 A. Most likely my personal.  
9 Q. Okay. That was given to Mr. O'Hara?  
10 A. Yeah, he always have it.  
11 Q. To use for work as necessary?  
12 A. Yes.  
13 Q. Okay. So, did you have to buy a pump for  
14 this purpose or rent it?  
15 A. I will get back to you.  
16 Q. You don't know?  
17 A. No.  
18 Q. Same thing with dehumidifies, do you know?  
19 A. We might have those available.  
20 Q. Okay.  
21 A. But I'm not so sure.  
22 Q. Okay. With respect to removal of damaged  
23 property, did you rent a dumpster?  
24 A. Yes.  
25 Q. So you got a dumpster?

1 A. Yes.  
2 Q. So, there would be a receipt of some sort  
3 for that.  
4 A. Yes.  
5 Q. The last line says "Reinstall baseboards."  
6 I assume, maybe I'm wrong, that sounds like  
7 something that's done after everything has been  
8 repaired, right?  
9 A. Uh-huh.  
10 Q. Next page it appears to be an invoice on  
11 the letterhead of New York Stone of NE.  
12 A. Yes. Now for the record, that's also my  
13 company.  
14 Q. Okay.  
15 A. So, New York Stone New England, my  
16 company, we are importer of slabs or stone product  
17 and then. Yeah, that's actually my cost for this  
18 particular material.  
19 Q. So, this was an invoice from New York  
20 Stone to Concepts USA, right?  
21 A. Yes.  
22 Q. Is this the format, is this the typical  
23 invoice for New York Stone?  
24 A. Yeah.  
25 Q. So, if I went to New York Stone and got

1 something it would look like this?  
2 A. Very similar.  
3 Q. Okay. You mentioned earlier that you  
4 decided not to go with wood flooring any more in the  
5 basement, right?  
6 A. Yes.  
7 Q. This is a reference to the polished tile  
8 that you decided to install?  
9 A. Yes.  
10 Q. So, this polished tile was then installed  
11 in the basement after the June loss, right?  
12 A. Yes.  
13 Q. Did you give yourself a discount on the  
14 price?  
15 A. That's my cost.  
16 Q. That's your cost?  
17 A. Yeah.  
18 Q. When you say your cost, are you referring  
19 to New York Stone's cost or Concepts USA cost?  
20 A. No. No. Well, it's the same. It's the  
21 same.  
22 Q. So, do you write a check to New York  
23 Stone?  
24 A. No, I never. This is like this still  
25 open.

1 Q. You haven't paid them?  
2 A. No, I haven't paid myself. I'm waiting  
3 for you.  
4 Q. Next page looks like another invoice or  
5 something of that nature, can you tell me what it  
6 is?  
7 A. So, this is the guy that actually  
8 installed, he was doing the work for Hondu, but a  
9 separate guy and then he was the installer of the  
10 tiles.  
11 Q. So, then, the cost of the tile  
12 installation would be materials which you got from  
13 New York Stone for \$2,500 and this guy which is,  
14 looks like --  
15 A. Godniez.  
16 Q. Godniez. G-O-D-N-I-E-Z.  
17 A. Yes.  
18 Q. He charged \$3,5000 to do the labor to  
19 install the tile?  
20 A. Uh-huh.  
21 Q. Did you?  
22 A. No, he got taken care of by Hondu, okay.  
23 Q. Okay. So, you didn't pay him directly?  
24 A. No.  
25 Q. So, did you pay this bill incorrectly

1 somehow?

2 A. No. I pay Hondu and they distribute. So

3 if you see the listing there.

4 Q. Let's get right to it then. There are two

5 spreadsheets that are marked as exhibits here one is

6 13 and one is 12. I believe 13 is the spreadsheet

7 that you mentioned is, it's not, it's the QuickBooks

8 report of checks written to Mr. O'Hara, right?

9 A. Yes.

10 Q. Okay. And then Exhibit 12 seems to be

11 another --

12 A. Exactly.

13 Q. -- list of transactions. Could you tell

14 me what Exhibit 12 is?

15 A. If I tell you.

16 Q. Yeah. Could you tell me what is Exhibit

17 12?

18 A. This is a listing of payments of, it's

19 just like QuickBooks kind of listing.

20 Q. Is this a QuickBooks listing for Concepts

21 USA?

22 A. Yes.

23 Q. Is this your check register?

24 A. Yes.

25 Q. Now somewhere on that listing is there an

1 entry that somehow corresponds to the \$3,500 charge

2 for Mr. Godniez?

3 A. Yes.

4 Q. Could you tell me?

5 A. No. No. No. Okay. He won't come just

6 like a round number. If you take this take there,

7 if you add this, if you add those, okay those will

8 be way more than just this and what I allocated for

9 this repair. Okay?

10 Q. Okay.

11 A. That's why I said from the beginning it's

12 very hard because I didn't really get an invoice for

13 this tile and this tile and I was all like one

14 project and since my guy sometimes is doing work

15 here and here and here.

16 Q. So, a moment ago you said something like

17 you take this, you take this. Could you tell me

18 what transactions on this register were you

19 referring to as being transactions that somehow

20 relate to the Godniez \$3,500 charge?

21 A. Well, if we look at Godniez and Hondu,

22 okay, just roughly between the two is \$8,000, okay.

23 Yeah, \$51 plus \$3,500. If we look at that, the

24 amount I paid to Hondu it's way more than this.

25 Just these two.

1 Q. So, when you're saying "these two" what

2 two are you referring to by date?

3 A. The \$4,000, 7/1 here and 7/15 here. This

4 like what, 45 plus \$3,000 and then there was another

5 one, just the three of those is way over. So, I'm

6 actually giving you a discount. I don't know

7 exactly penny to penny because it doesn't work this

8 way, okay. Once you have the receipts and

9 everything and the material we bought, let's say the

10 tile, then you can correlate and everything is going

11 to make sense. Let's say to do the flooring we

12 needed to buy tile, the inset from Home Depot.

13 Q. Okay. So you'll have an invoice for that,

14 right?

15 A. Not an invoice.

16 Q. Or a receipt?

17 A. Receipt for the material.

18 Q. From Home Depot?

19 A. Yes. Once the receipt then everything

20 is --

21 Q. As far as Hondu is concerned, you

22 mentioned that, I think you mentioned that you have

23 some sort of receipts from Hondu or invoices from

24 Hondu?

25 A. Hondu does not giving me receipts. Hondu

1 is giving me time sheet of how much they worked.

2 Q. Okay.

3 A. Okay. That's what I'm going to give you

4 by the way. I'm going to give you an exact

5 breakdown of how you can say, okay, how come you get

6 to like \$4,776, I'll show you exactly how.

7 Q. Okay. I think you mentioned that you were

8 going to look for your copies of his original

9 paperwork.

10 A. Yes.

11 Q. All right. So, apart from this

12 spreadsheet register, that's Exhibit 12, this runs

13 from July 1, 2014 to November 3, 2014, right?

14 A. Uh-huh yeah. Well, it's May, you know, a

15 little over what we did.

16 Q. Right.

17 A. Not just like --

18 Q. Just trying to get the time frame on this.

19 A. Well, it's yeah, I would guess the first

20 payment I did for on July 1 and then there after.

21 Q. Okay. Is there a reason that this starts

22 on July 1 as opposed to earlier than that?

23 A. No, because I do pay on the 1st and 15th,

24 okay, everything is compiled and I cut checks twice

25 a month.

1 Q. Okay. So, prior to July 1, 2014, there  
2 would be no --  
3 A. No payment.  
4 Q. No payments that you made?  
5 A. But there might be a credit card receipt.  
6 Q. Okay. You might have credit card charges?  
7 A. Yes.  
8 Q. Okay. Which you're gonna look for, right?  
9 A. Yes.  
10 Q. And so in this time frame from, I guess  
11 June 1 through November 3, was Hondu doing any other  
12 work for you other than --  
13 A. Hondu is doing work all the time for me.  
14 Q. Okay.  
15 A. I am repeating this I feel, maybe that's  
16 why this arrangement is kind of.  
17 Q. Well, when was the work done with respect  
18 to repairing the damage from the June 2014 water  
19 loss?  
20 A. So, it started immediately after the  
21 damage, so but not -- we needed to take steps okay,  
22 so if the damage started on the 20th, probably we  
23 started, you know, actual laying or cleaning and  
24 then you had to take all the sheetrock then we had  
25 to buy the material, so you know, maybe a few weeks

1 to this June maybe into August even.  
2 Q. You don't know when it was completed?  
3 A. No, look if we want to go into detail, we  
4 can. I mean, it's not problem because it will make  
5 sense and to me too. Once we see the receipts,  
6 everything will come into place and we will be able  
7 to throw it out.  
8 Q. Okay. Okay. So, what was the origin then  
9 of this statement?  
10 A. Which one?  
11 Q. This one Godniez, it's in Exhibit 15.  
12 A. Well, Godniez, was doing actually the work  
13 for the -- he was the one to do the --  
14 Q. He was working for Hondu?  
15 A. He was the number one, okay.  
16 Q. Working for Hondu, right?  
17 A. For Hondu. So, this was his job. Hondu  
18 did the sheetrocking, I mean, there were a lot of  
19 other things he needed. Also help, I good doing  
20 whatever lest doing. Okay.  
21 Q. So, but the focus of my question was, who  
22 put together the Godniez --  
23 A. The \$3,500?  
24 Q. -- statement or invoice or whatever?  
25 A. I just like, said, look mean usually they

1 charge just about, you know, seven bucks per square  
2 foot to put the tiles in. I just did the simple  
3 math.  
4 Q. So, you put this together?  
5 A. I did.  
6 Q. Okay. So, this isn't really something  
7 that Godniez did?  
8 A. No.  
9 Q. So, how was it that you computed the  
10 \$3,500? You mentioned I think you were saying  
11 something you did some math, okay, I just --  
12 A. I just said 520 times six or seven bucks  
13 per square foot, that brings it to \$3,500.  
14 Q. Okay. So, that's the basis of the \$3,500  
15 number appearing on the Godniez --  
16 A. Yeah.  
17 Q. -- document? Now, getting to the Hondu  
18 document, which appears to be the last page of  
19 Exhibit 15, is that also something that you put  
20 together?  
21 A. No. This is purely -- yes, sorry. Yeah.  
22 Yeah, because again, Hondu doesn't give me invoices.  
23 Q. Right. He gives you his numbers and you  
24 put together a spreadsheet.  
25 A. Yes, exactly.

1 Q. So, how did you put together this Hondu  
2 invoice?  
3 A. Well, I take the hours, okay, that he  
4 gives me and I kind of like separate it from other  
5 hours that let's say they did something else, and  
6 that's what it came to be.  
7 Q. Okay. Because in this time frame you had,  
8 he was working on some other jobs for you?  
9 A. Yeah. Yes. Yes. The majority was this  
10 but, yes. I mean...  
11 Q. What other jobs did you have going? You  
12 mentioned the house in West Haven.  
13 A. Yes.  
14 Q. What is that, is that your second home or  
15 vacation home?  
16 A. Yeah.  
17 Q. I call it vacation.  
18 A. Yeah.  
19 Q. But that's not really a real estate  
20 investment property, right? I mean it's not a  
21 rental property.  
22 A. No, I'm not renting it.  
23 Q. Okay. It's not something you're trying to  
24 flip, right?  
25 A. No.

1 Q. Or it's not something you're rehabbing to  
2 sell, right?

3 A. I may end up selling it.

4 Q. Okay. But in this time frame, in the  
5 summer of 2014, did you have other properties that  
6 you were working on?

7 A. Yes.

8 Q. What was -- can you tell me what?

9 A. Yes. I had a property on Clark that  
10 needed some attention.

11 Q. Where?

12 A. In Bridgeport too.

13 Q. Bridgeport?

14 A. Yeah, Clark, Clark Street, Clark that's  
15 the name of it.

16 Q. Okay. So you?

17 A. Avenue, Clark Avenue.

18 Q. So, was that house for sale too?

19 A. Well, it was not. It was never actually  
20 placed for sale. My intention was to rent it and it  
21 need like touch up, it needed some attention and so  
22 I would say send, you know, Ermes to look to  
23 inspect, but the majority really after the crisis,  
24 let's call it this way, was really to take over to  
25 take care of the house in Jackson because we wanted

1 of Exhibit 15 is, looks like an invoice on letter  
2 head A&G Mechanical.

3 A. I see that, okay. Now here actually, this  
4 was -- this is, I put it down only \$2,200 and also I  
5 put it here. Part of this was related to a  
6 different job.

7 Q. Okay.

8 A. So, or to a job exactly, I have to clarify  
9 this. It may not be all related to damage, okay.  
10 But I did kind of, here you have it here. See here  
11 I put it, \$1,500 and \$700 in particular.

12 Q. Just for the record, could you refer what  
13 date and amount that referring to when you circled  
14 that?

15 A. Should I say it?

16 Q. Yes.

17 A. Okay. 7/7/14 and \$1,500 and then another  
18 \$700 on 8/27.

19 Q. So, what you're saying is that the amount  
20 paid to A&G that was related to the June water  
21 damage loss was \$2,200.

22 A. Yes, that was directly related to that.

23 Q. Okay.

24 A. We had to pay for the pump. I remember,  
25 look, not everything is so clear but I do remember

1 to sell it.

2 Q. Okay.

3 A. It was a lot of pressure by the agent,  
4 real estate agent because he wanted to show the  
5 house and we were just there.

6 Q. Okay.

7 A. And suddenly all these things about.

8 Q. Okay. Was there work being done on  
9 Jackson that was intended to fix it up and sell that  
10 wasn't part of the water damage loss, like you  
11 mentioned --

12 A. No.

13 Q. -- landscaping and things like that  
14 earlier?

15 A. No. Very, very little, very little. I  
16 mentioned the punch list of stuff we needed to do,  
17 kind, let's say if there was a like outlet that  
18 needed adjustment or need to be kind of tightened,  
19 stuff like this.

20 Q. Okay.

21 A. But not to this kind of numbers.

22 Q. Okay.

23 A. It was all fairness you can call Dwight,  
24 he can be a witness for all this.

25 Q. Okay. The documents on the preceding page

1 that we needed to put a pump there. I don't think  
2 it was related directly to the flood or maybe to the  
3 previous flood, but that's as far as I remember.

4 Q. Okay.

5 A. Again, I'm just going by what actually  
6 transpired as far as checks going.

7 Q. Did A&G Mechanical give you any other --

8 A. No, but this is -- sorry.

9 Q. Paperwork related to this invoice? In  
10 other words, sometimes people will ask for a work  
11 order or authorization or something before they go  
12 ahead and do something that they want somebody to  
13 sign off on confirming that they're instructed to  
14 relate the sump pump. Did they give you any kind of  
15 paperwork like that?

16 A. No, but he is very organized, this is A&G  
17 guy. So, I can always ask for, you know, another  
18 set of documents to support anything. Okay.

19 Q. Then what is the amount that you claim  
20 that you spent in repairing from the June 2014 water  
21 loss?

22 A. You mean for what, A&G?

23 Q. Well you mentioned A&G is \$1,500, right?

24 A. No, \$2,200. Then if we had everything  
25 together.

1 Q. If you add everything together?  
 2 A. We can calculate it. So, we can -- so, we  
 3 have \$3,000.  
 4 Q. Well --  
 5 A. \$2,500.  
 6 Q. On the \$3,000 okay, you said that that was  
 7 something David put together, right?  
 8 A. Yeah, that's. Yes.  
 9 Q. Okay.  
 10 A. And look, I don't know if we are here to  
 11 strike a deal, I don't know, I'm not prepared for  
 12 that, but there's a very good price. Again, I don't  
 13 know what the purpose of this is, so, again I have  
 14 to -- so, I have his numbers, just about sixteen  
 15 thousand point three again, this is my cost because  
 16 I did the job directly with my people.  
 17 Q. How did you get to sixteen thousand point  
 18 three?  
 19 A. So, \$3,000 plus two point five, plus three  
 20 point five, plus five point one, two point two.  
 21 MR. MEEHAN: Okay. I don't have anything  
 22 further. Thank you.  
 23 THE WITNESS: Okay. Thank you.  
 24 MR. LEAVITT: Thank you.  
 25 (Whereupon, Deposition concluded at 1:31

1 p.m.)  
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1 STATE OF CONNECTICUT :  
 2 :ss WALLINGFORD  
 3 COUNTY OF NEW HAVEN :  
 4 I, Emily Collette, LSR, a Notary Public  
 5 for the State of Connecticut, do hereby certify that  
 6 the deposition of AMIEL DABUSH DOREL, a witness, was  
 7 taken before me pursuant to Section 242, et seq., of  
 8 Connecticut Practice Book, held at The Law Offices  
 9 of Slutsky, McMorris, & Meehan, LLP, 396 Danbury  
 10 Road, Wilton, CT, commencing at 1:53 p.m. on  
 11 Tuesday, September 28, 2015.  
 12 I further certify that the witness was  
 13 first sworn by me to tell the truth, the whole  
 14 truth, and nothing but the truth and was examined by  
 15 counsel, and his testimony stenographically reported  
 16 by me and subsequently transcribed as here before  
 17 appears.  
 18 I further certify that I am not related to the  
 19 parties hereto their counsel, and that I am not in  
 20 anyway interested in the events of said cause.  
 21 Dated New Haven, Connecticut, on this 20th day of  
 22 October 2015.  
 23 \_\_\_\_\_  
 24 Notary Public  
 25 MY COMMISSION EXPIRES: APRIL 30, 2016  
 LICENSE NO. 503

1  
 2 A+ REPORTING SERVICES  
 3 PO BOX 831  
 4 WALLINGFORD, CT 06492  
 5 (203) 269-9976  
 6 INSTRUCTIONS FOR READING AND SIGNING OF DEPOSITION  
 7 OR STATEMENT UNDER OATH:  
 8 1. Please read the enclosed transcript of your  
 9 testimony.  
 10 2. After reading the transcript, appear before a  
 11 Notary Public and sign before him/her on the bottom  
 12 of the Errata Sheet where indicated and have the  
 13 Notary Public sign where indicated.  
 14 3. If there are any corrections to be made to the  
 15 transcript, please use the attached form for any and  
 16 all corrections. Have a Notary Public sign, along  
 17 with your signature, on the bottom of the sheet  
 18 entitled "ERRATA SHEET" where indicated.  
 19 4. Please complete this procedure within 30 days of  
 20 receipt of the transcript as allowed by the Statute.  
 21 5. IMPORTANT: Upon proper signing by a Notary  
 22 Public and yourself, it is important to RETURN THE  
 23 ERRATA SHEET to all counsel of record.  
 24 6. If there are not corrections to be made to the  
 25 transcript, please write on the form entitled  
 "ERRATA SHEET," "NO CORRECTIONS TO BE MADE."  
 Return that form to all counsel of record.  
 7. If you have any questions regarding this  
 procedure, please contact your attorney.

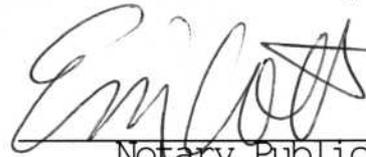
1 STATE OF CONNECTICUT :  
2 :ss WALLINGFORD  
3 COUNTY OF NEW HAVEN :

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22 October 2015.



Notary Public

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"ERRATA SHEET," "NO CORRECTIONS TO BE MADE."  
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7. If you have any questions regarding this  
procedure, please contact your attorney.



# **EXHIBIT E**



# **EXHIBIT F**

POLICY NO.  
**ATR-D-16370**  
 POLICY TERM  
**2/12/14 TO 2/12/15**  
 AMT OF BLDG COV AT TIME OF LOSS  
**\$300,000**  
 AMT OF CNTS COV AT A TIME OF LOSS  
**\$30,000**

## SWORN STATEMENT IN PROOF OF LOSS

INS CLAIM NO.  
**140514-011**  
 AGENT  
**Jimco Agency, Inc.**  
 AGENCY AT  
**Montvale, NJ**

ANY PERSONS WHO KNOWINGLY AND WITH INTENT TO DEFRAUD ANY INSURANCE COMPANY OR OTHER PERSON FILES A STATEMENT OF CLAIM CONTAINING ANY MATERIALLY FALSE INFORMATION, OR CONCEALS FOR THE PURPOSE OF MISLEADING, INFORMATION CONCERNING ANY FACT MATERIAL THERETO, COMMITS A FRAUDULENT INSURANCE ACT, WHICH IS A CRIME.

### CERTAIN UNDERWRITERS AT LLOYDS, LONDON

At the time of loss, by the above indicated policy of insurance, you insured the interests of **Amel Dabush Dorel** against loss to the property described according to the terms and conditions of said policy and of all forms, endorsements, transfers, and assignments attached thereto.

**TIME AND ORIGIN**                      A water loss occurred about the hour of 12 \_\_\_\_\_ o'clock \_\_\_\_\_ A \_\_\_\_\_ M.  
 on the 10<sup>th</sup> day of May 1014 the cause of the said loss was: water damage to basement

**OCCUPANCY**                              The premises described, or containing the property described, was occupied at the time of the loss as follows, and for no other purpose whatever: rental

**INTEREST**                                No other person or persons had any interest therein or incumbrance thereon, except: NO Exceptions

|  |             |
|--|-------------|
| 1. FULL COST OF REPAIR OR REPLACEMENT .....  | \$ 6,332.32 |
| 2. LESS APPLICABLE non-recoverable DEPRECIATION .....  | \$ 915.68   |
| 3. ACTUAL CASH VALUE LOSS is .....   | \$ 5,416.64 |
| 4. LESS DEDUCTIBLES .....  | \$ 2,500.00 |
| 5. NET AMOUNT CLAIMED under above numbered policy is ACV policy.....   | \$ 2,916.64 |
| 6. SUPPLEMENTAL CLAIM, to be filed in accordance with the terms and conditions of the Replacement Cost Coverage will not exceed....non-recoverable depreciation..... | \$ 0        |

The said loss did not originate by any act, design or procurement on the part of your insured, nothing has been done by or with the privity or consent of your insured to violate the conditions of the policy, or render it void; no articles are mentioned herein or in annexed schedules but such as were destroyed or damaged at the time of the loss, no property saved has in any manner been concealed, and attempt to deceive the said loss, has in any manner been made. Any other information that may be required will be furnished and considered a part of this proof.

Subrogation- to the extent of the payment made or advanced under this policy, the insured hereby assigns, transfers and sets over to the insurer all rights, claims, or interests that he has against any person, firm or corporation liable for the loss of damage to the property for which payment is made or advanced. He also hereby authorizes the insurer to sue any such third party in his name.

The insured hereby warrants that no release has been given or will be given or settlement or compromise made or agreed upon with any third party who may be liable in damages to the insured with respect to the claim being made herein.

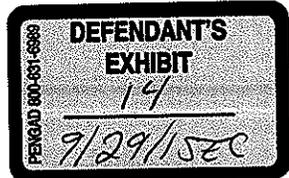
The furnishing of this blank or the preparation of proofs by a representative of the above insurer is not a waiver of any of its rights.

State of Connecticut

County of Fairfield

*Amel Dorel*  
 \_\_\_\_\_  
 insured

*Deborah O'Hara*  
 \_\_\_\_\_  
 Deborah O'Hara  
 NOTARY PUBLIC  
 State of Connecticut  
 My Commission Expires 3/31/2016





CAPSTONE  
ISG

## Capstone ISG

---

5624 Executive Center Dr  
Ste. 150  
Charlotte, NC 28212  
Telephone (704) 535-8242  
Fax (704) 535-7729

Insured: Omar Sahar & Amiel Dabush Dorel  
Property: 441 Jackson Ave  
Bridgeport, CT 06608

Claim Rep.: David Wills

Business: (860) 882-8352  
E-mail: davidwills04@yahoo.com

Estimator: David Wills

Business: (860) 882-8352  
E-mail: davidwills04@yahoo.com

**Claim Number:** 140514-011

**Policy Number:** ATR-D-16370

**Type of Loss:** Water-Other

Date Contacted: 5/20/2014

Date of Loss: 5/10/2014

Date Inspected: 5/22/2014

Date Received: 5/20/2014

Date Entered: 5/22/2014 12:36 PM

Price List: CTST7X\_MAY14  
Restoration/Service/Remodel  
Estimate: 2014-05-24-1235

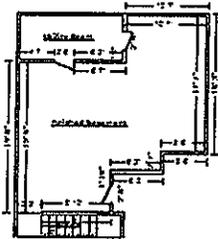


**Capstone ISG**

5624 Executive Center Dr  
 Ste. 150  
 Charlotte, NC 28212  
 Telephone (704) 535-8242  
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2014-05-24-1235

**Main Level**



**Finished basement**

**Height: 8'**

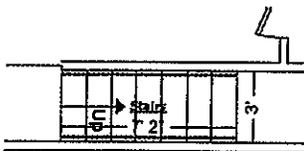
|                            |                          |
|----------------------------|--------------------------|
| 764.00 SF Walls            | 444.75 SF Ceiling        |
| 1208.75 SF Walls & Ceiling | 444.75 SF Floor          |
| 49.42 SY Flooring          | 95.50 LF Floor Perimeter |
| 95.50 LF Ceil. Perimeter   |                          |

**Missing Wall**

**3' 2" X 8'**

**Opens into STAIRS1**

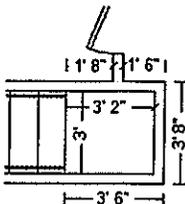
| DESCRIPTION  | QUANTITY  | UNIT COST | RCV             | DEPREC.       | ACV             |
|--|-----------|-----------|-----------------|---------------|-----------------|
| 1. R&R Laminate - simulated wood flooring                                    | 444.75 SF | 6.92      | 3,077.67        | (518.58)      | 2,559.09        |
| 2. Detach & Reset Baseboard - 3 1/4"   | 95.50 LF  | 1.90      | 181.45          | (0.00)        | 181.45          |
| 3. Seal & paint baseboard - two coats  | 95.50 LF  | 1.09      | 104.10          | (20.82)       | 83.28           |
| 4. R&R Drywall per LF - up to 2' tall  | 95.50 LF  | 7.70      | 735.36          | (107.53)      | 627.83          |
| 7. Seal more than the floor perimeter w/latex based stain blocker - one coat | 191.00 SF | 0.45      | 85.95           | (17.19)       | 68.76           |
| 5. Paint the walls - one coat  | 764.00 SF | 0.49      | 374.36          | (74.87)       | 299.49          |
| 9. Final cleaning - construction - Residential                               | 444.75 SF | 0.19      | 84.50           | (0.00)        | 84.50           |
| <b>Totals: Finished basement</b>   |           |           | <b>4,643.39</b> | <b>738.99</b> | <b>3,904.40</b> |



**Stairs**

**Height: 17'**

|                           |                          |
|---------------------------|--------------------------|
| 189.55 SF Walls           | 21.46 SF Ceiling         |
| 211.01 SF Walls & Ceiling | 37.33 SF Floor           |
| 4.15 SY Flooring          | 16.77 LF Floor Perimeter |
| 14.31 LF Ceil. Perimeter  |                          |



**Subroom 1: STAIRS3**

**Height: 17'**

|                           |                         |
|---------------------------|-------------------------|
| 100.33 SF Walls           | 9.50 SF Ceiling         |
| 109.83 SF Walls & Ceiling | 9.50 SF Floor           |
| 1.06 SY Flooring          | 9.33 LF Floor Perimeter |
| 9.33 LF Ceil. Perimeter   |                         |

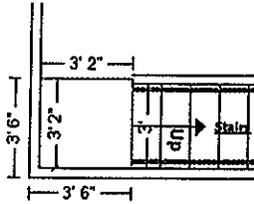
**Missing Wall**

**3' X 17'**

**Opens into STAIRS**



5624 Executive Center Dr  
Ste. 150  
Charlotte, NC 28212  
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**Subroom 2: STAIRS1**

**Height: 17'**

|                           |                         |
|---------------------------|-------------------------|
| 99.75 SF Walls            | 10.03 SF Ceiling        |
| 109.78 SF Walls & Ceiling | 10.03 SF Floor          |
| 1.11 SY Flooring          | 6.33 LF Floor Perimeter |
| 6.33 LF Ceil. Perimeter   |                         |

|              |             |            |              |
|--------------|-------------|------------|--------------|
| Missing Wall | 3' 2" X 17' | Opens into | FINISHED_BAS |
| Missing Wall | 3' X 17'    | Opens into | STAIRS       |

| DESCRIPTION                   | QUANTITY  | UNIT COST | RCV             | DEPREC.       | ACV             |
|-------------------------------|-----------|-----------|-----------------|---------------|-----------------|
| 6. Paint the walls - one coat | 389.63 SF | 0.49      | 190.92          | (0.00)        | 190.92          |
| <b>Totals: Stairs</b>         |           |           | <b>190.92</b>   | <b>0.00</b>   | <b>190.92</b>   |
| <b>Total: Main Level</b>      |           |           | <b>4,834.31</b> | <b>738.99</b> | <b>4,095.32</b> |

**General Items**

| DESCRIPTION  | QUANTITY | UNIT COST | RCV             | DEPREC.       | ACV             |
|--|----------|-----------|-----------------|---------------|-----------------|
| 8. Single axle dump truck - per load - including dump fees | 1.00 EA  | 314.30    | 314.30          | (0.00)        | 314.30          |
| <b>Totals: General Items</b>                               |          |           | <b>314.30</b>   | <b>0.00</b>   | <b>314.30</b>   |
| <b>Line Item Totals: 2014-05-24-1235</b>                   |          |           | <b>5,148.61</b> | <b>738.99</b> | <b>4,409.62</b> |

**Grand Total Areas:**

|                           |                                   |                               |
|---------------------------|-----------------------------------|-------------------------------|
| 1,460.30 SF Walls         | 563.51 SF Ceiling                 | 2,023.81 SF Walls and Ceiling |
| 579.38 SF Floor           | 64.38 SY Flooring                 | 166.27 LF Floor Perimeter     |
| 0.00 SF Long Wall         | 0.00 SF Short Wall                | 163.81 LF Ceil. Perimeter     |
| 579.38 Floor Area         | 609.44 Total Area                 | 1,000.00 Interior Wall Area   |
| 792.00 Exterior Wall Area | 88.00 Exterior Perimeter of Walls |                               |
| 0.00 Surface Area         | 0.00 Number of Squares            | 0.00 Total Perimeter Length   |
| 0.00 Total Ridge Length   | 0.00 Total Hip Length             |                               |



**Capstone ISG**

5624 Executive Center Dr  
Ste. 150  
Charlotte, NC 28212  
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Fax (704) 535-7729

**Summary for Dwelling**

|   |   |          |          |                   |
|---|---|----------|----------|-------------------|
| Line Item Total                               |   |          |          | 5,148.61          |
| Material Sales Tax                            | @ | 6.350% x | 1,936.25 | 122.95            |
|   |   |          |          | <hr/>             |
| Overhead                                      | @ | 10.0% x  | 5,271.56 | 527.16            |
| Profit  | @ | 10.0% x  | 5,271.56 | 527.16            |
| Cleaning Sales Tax                            | @ | 6.350% x | 101.40   | 6.44              |
|   |   |          |          | <hr/>             |
| <b>Replacement Cost Value</b>                 |   |          |          | <b>\$6,332.32</b> |
| Less Depreciation                             |   |          |          | (915.68)          |
|   |   |          |          | <hr/>             |
| <b>Actual Cash Value</b>                      |   |          |          | <b>\$5,416.64</b> |
| Less Deductible                               |   |          |          | (2,500.00)        |
|   |   |          |          | <hr/>             |
| <b>Net Claim</b>                              |   |          |          | <b>\$2,916.64</b> |
|   |   |          |          | <hr/> <hr/>       |
| Total Recoverable Depreciation                |   |          |          | 915.68            |
|   |   |          |          | <hr/>             |
| <b>Net Claim if Depreciation is Recovered</b> |   |          |          | <b>\$3,832.32</b> |
|   |   |          |          | <hr/> <hr/>       |

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David Wills



**Capstone ISG**

5624 Executive Center Dr  
Ste. 150  
Charlotte, NC 28212  
Telephone (704) 535-8242  
Fax (704) 535-7729

**Recap by Room**

Estimate: 2014-05-24-1235

**Area: Main Level**

|                   |          |        |
|-------------------|----------|--------|
| Finished basement | 4,643.39 | 90.19% |
| Stairs            | 190.92   | 3.71%  |

---

|                                  |                 |               |
|----------------------------------|-----------------|---------------|
| <b>Area Subtotal: Main Level</b> | <b>4,834.31</b> | <b>93.90%</b> |
| General Items                    | 314.30          | 6.10%         |

---

|                          |                 |                |
|--------------------------|-----------------|----------------|
| <b>Subtotal of Areas</b> | <b>5,148.61</b> | <b>100.00%</b> |
|--------------------------|-----------------|----------------|

---

|              |                 |                |
|--------------|-----------------|----------------|
| <b>Total</b> | <b>5,148.61</b> | <b>100.00%</b> |
|--------------|-----------------|----------------|

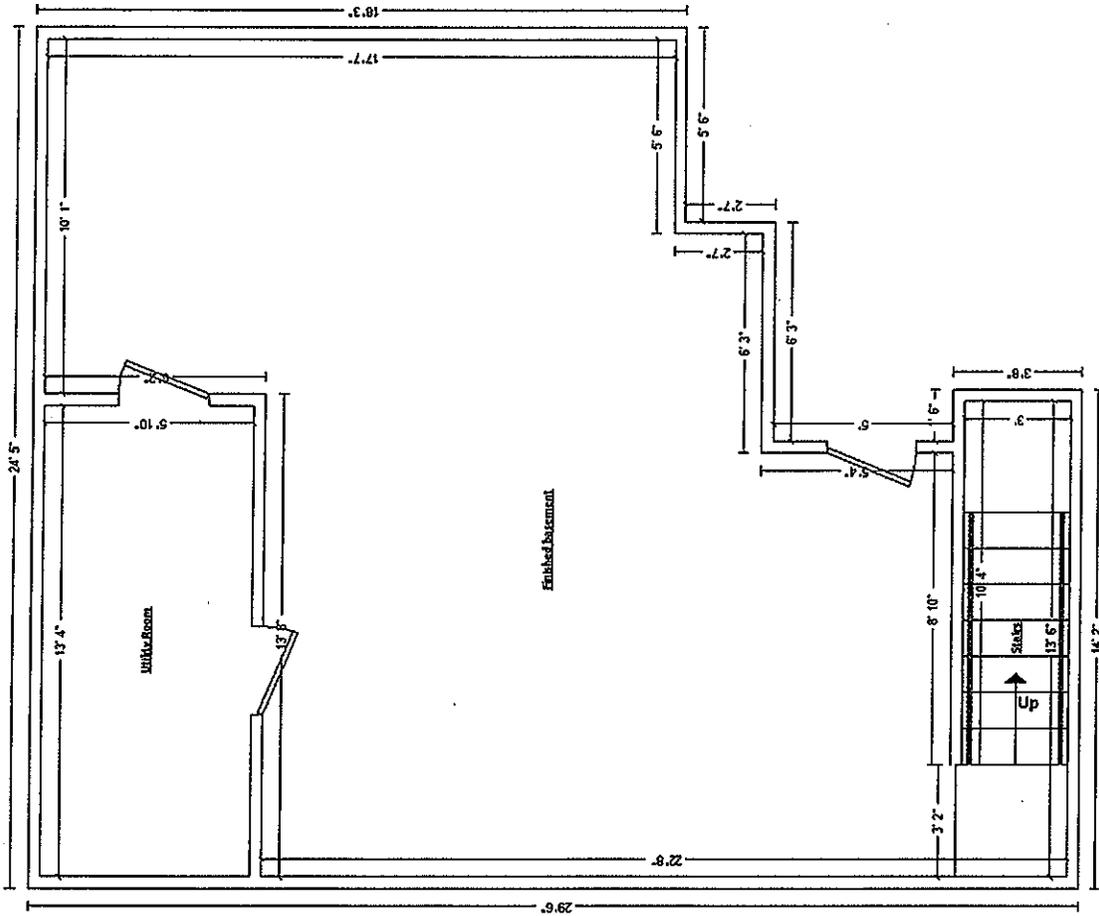


# Capstone ISG

5624 Executive Center Dr  
Ste. 150  
Charlotte, NC 28212  
Telephone (704) 535-8242  
Fax (704) 535-7729

## Recap by Category with Depreciation

| O&P Items                     |   |        | RCV             | Deprec.       | ACV             |
|-------------------------------|---|--------|-----------------|---------------|-----------------|
| CLEANING                      |   |        | 84.50           |               | 84.50           |
| GENERAL DEMOLITION            |   |        | 996.77          |               | 996.77          |
| DRYWALL                       |   |        | 537.67          | 107.53        | 430.14          |
| FLOOR COVERING - WOOD         |   |        | 2,592.89        | 518.58        | 2,074.31        |
| FINISH CARPENTRY / TRIMWORK   |   |        | 181.45          |               | 181.45          |
| PAINTING                      |   |        | 755.33          | 112.88        | 642.45          |
| <b>O&amp;P Items Subtotal</b> |   |        | <b>5,148.61</b> | <b>738.99</b> | <b>4,409.62</b> |
| Material Sales Tax            | @ | 6.350% | 122.95          | 24.07         | 98.88           |
| Overhead                      | @ | 10.0%  | 527.16          | 76.31         | 450.85          |
| Profit                        | @ | 10.0%  | 527.16          | 76.31         | 450.85          |
| Cleaning Sales Tax            | @ | 6.350% | 6.44            |               | 6.44            |
| <b>Total</b>                  |   |        | <b>6,332.32</b> | <b>915.68</b> | <b>5,416.64</b> |



Main Level

# **EXHIBIT G**

DEPARTMENT OF POLICE  
BRIDGEPORT, CONNECTICUT

INCIDENT REPORT

UNFOUNDED      ARREST      INACTIVE  
OPEN      CLOSED      CLEARED  
WARRANT ADVISED      APPROVED

|             |     |     |    |
|-------------|-----|-----|----|
| REVIEW<br>D | DP  | I   | U  |
|             | UCR | III | IV |
|             |     | V   | VI |

|   |                          |  |            |
|---|--------------------------|--|------------|
| 1. INCIDENT NUMBER<br><b>140620-209</b> | 2. INVESTIGATIVE CASE NO | 3. TYPE OF CRIME / INCIDENT<br><b>Burglary/ Damage to Property</b> | 4. CODE(S) |
|---|--------------------------|--|------------|

|   |   |  |
|---|---|--|
| 5. DISPATCHED<br><b>M.06 D20 Y14 T.1652</b> | 7. TIME OF OCCURRENCE<br><b>M.06 D20 Y14 T.1648</b> | 8. DISPATCHED TO:<br><b>414 Jackson Ave.</b> |
|---|---|--|

|  |  |                            |                              |
|--|--|----------------------------|------------------------------|
| 9. LOCATION OF CRIME / INCIDENT<br><b>414 Jackson Ave.</b> | 10. TYPE OF PREMISES<br><b>Residence</b> | 11. SECTOR<br><b>Amber</b> | 12. REPORT AREA<br><b>24</b> |
|--|--|----------------------------|------------------------------|

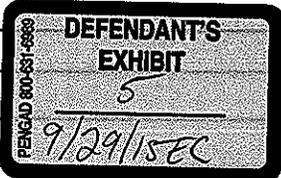
|                             |   |  |   |                               |
|-----------------------------|---|--|---|-------------------------------|
| 13. NO. OF VICT<br><b>1</b> | 14. VICTIM'S NAME (LAST, FIRST, MIDDLE)<br><b>Dabush-Dorel, Amiel</b> | 15. VICTIM'S COMPLETE ADDRESS<br><b>14 Marshall Ln. Weston CT. 06883</b> | 16. HOME TELEPHONE<br><b>203-216-5128</b> | 17. BUSINESS/SCHOOL TELEPHONE |
|-----------------------------|---|--|---|-------------------------------|

|                      |                                      |                          |                        |          |  |
|----------------------|--------------------------------------|--------------------------|------------------------|----------|--|
| 18. Age<br><b>59</b> | 19. Date of Birth<br><b>10/21/55</b> | 20. Race<br><b>Other</b> | 21. Sex<br><b>Male</b> | 22. SSN. | 23. Place of Employment/ School Attending (Complete Address) |
|----------------------|--------------------------------------|--------------------------|------------------------|----------|--|

|  |                                       |                            |   |                                       |
|--|---------------------------------------|----------------------------|---|---------------------------------------|
| 24. Victim Injured <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 25. Nature of Injury(s)<br><b>N/A</b> | 26. Hospital<br><b>N/A</b> | ADMITTED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 27. Attending Physician<br><b>N/A</b> |
|--|---------------------------------------|----------------------------|---|---------------------------------------|

28. Indicate with proper codes in boxes provided persons relationship to investigation - (V2) Victim #2 (W1) Witness #1, (W2) Witness #2, (Indica e also if avnionate) (ND Not Interviewed, or (PC) Person Canvassed

|                       |              |                               |                         |
|-----------------------|--------------|-------------------------------|-------------------------|
| 29. Individual's Name | 30. DOB /Age | 31. Address / Address Checked | 32. Telephone Numbers : |
|                       |              |                               | (H) (BS)                |



|  |   |  |
|--|---|--|
| 33. Indicate Who Can Identify Suspect                          | (R) Reporting Person, (D) Discoverer, (VI) Victim #1, (W 1) Witness # 1, (PK) Person Knowledgeable Etc. |  |
| 34. Suspect #1 (Name - Include Any AKA Info)<br><b>Unknown</b> | Suspect #2 (Name - Include Any AKA Info)  | Suspect #3 (Name - Include Any AKA Info) |

|  |                              |                              |
|--|------------------------------|------------------------------|
| 35. Suspect #1 May Be Located At<br><b>Unknown</b> | Suspect #2 May Be Located At | Suspect #3 May Be Located At |
|--|------------------------------|------------------------------|

|  |                        |                        |
|--|------------------------|------------------------|
| 36. Suspect #1 Description<br><b>Unknown</b> | Suspect #2 Description | Suspect #3 Description |
|--|------------------------|------------------------|

|  |        |   |        |   |
|--|--------|---|--------|---|
| 37. Arrested <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | D.O.B. | Arrested <input type="checkbox"/> Yes <input type="checkbox"/> No | D.O.B. | Arrested <input type="checkbox"/> Yes <input type="checkbox"/> No |
|--|--------|---|--------|---|

|   |                |          |          |                         |                                 |
|---|----------------|----------|----------|-------------------------|---------------------------------|
| 38. Vehicle Status<br><input type="checkbox"/> stolen <input type="checkbox"/> Recovered <input type="checkbox"/> suspect <input type="checkbox"/> Target | 39. Make/Model | 40. Year | 41. Type | 42. Colors (Top/Bottom) | 43. Identifying Characteristics |
|---|----------------|----------|----------|-------------------------|---------------------------------|

|                                      |  |                    |                |                |
|--------------------------------------|--|--------------------|----------------|----------------|
| 44. License Plate No. & Registration | 45. Property Description & Identifying Information | 46. Alarm (W/C N.) | 47. Loss Value | 48. Revd. Val. |
|--------------------------------------|--|--------------------|----------------|----------------|

|   |   |                |                |
|---|---|----------------|----------------|
| 49. Type of Property Taken/Damaged<br><b>Copper</b> | 50. Property Description & Identifying Information<br><b>Copper water pipes</b> | 51. Loss Total | 54. Revd. Tot. |
|---|---|----------------|----------------|

|  |  |                |                |
|--|--|----------------|----------------|
| 49. Type of Property Taken/Damaged<br><b>Floor</b> | 50. Property Description & Identifying Information<br><b>Basement wooden floor</b> | 51. Loss Total | 54. Revd. Tot. |
|--|--|----------------|----------------|

|  |   |                |                |
|--|---|----------------|----------------|
| 51. Point of Illegal Entry/Mean of Attack<br><b>Rear basement window</b> | 52. Type of Instrument/ Weapon (Describe)<br><b>Unknown</b> | 51. Loss Total | 54. Revd. Tot. |
|--|---|----------------|----------------|

|   |
|---|
| 55. Narrative: Summarize Details of Crime, Including Progression of Events, Names of Other Officers or Units Assisting on Scene.<br>For any additional information which is an Extension of any of the above blocks. Indicate Block Number at left. |
|---|

I, Ofc. M. Novia was dispatched to the above location on the report of a residential burglary. I spoke with the complainant who stated that the home is currently unoccupied. He says that the home has been recently remodeled and is now for sale. He states that around 1000 hrs today his plumber discovered the break in and damage. I observed several cut and missing pipes in the boiler room. The basement also became flooded and severely damaged the wooden floor There was also some damage to the baseboard heating system in one of the upstairs rooms. Amiel states that the suspect entered through a basement window in the rear of the home which is now secured with plywood. He says that the home was last inspected on 06/13/14 and the break took place between then and 1000hrs today. Due to the extensive damage Amiel was unable to provide accurate estimates at this time. He states that he will get a professional estimate from a licensed contractor. I issued Amiel a complaint service form and he advised me that he would contact his insurance company.

|  |                          |                           |                         |                           |
|--|--------------------------|---------------------------|-------------------------|---------------------------|
| 56. Physical Evidence<br><b>- None -</b> | 57. Property Receipt No. | 58. Related Incident Nos. | 59. Related Arrest Nos. | 60. Related Casualty Nos. |
|--|--------------------------|---------------------------|-------------------------|---------------------------|

|   |                     |                   |  |   |   |                                     |
|---|---------------------|-------------------|--|---|---|-------------------------------------|
| 61. Reporting Officer(s)<br><b>M. Novia</b> | CAD #<br><b>205</b> | Sect<br><b>24</b> | 62. Required Follow-up/Recommendations<br><b>Records</b> | 63. Supervisor Review<br><b>Sgt [Signature]</b> | Concur <input type="checkbox"/> Yes <input type="checkbox"/> No | Page<br><b>50</b><br>of<br><b>1</b> |
|---|---------------------|-------------------|--|---|---|-------------------------------------|

A  
B  
C  
D  
E  
F  
G  
H  
I  
J  
K  
L  
M  
N

## CERTIFICATION

This is to hereby certify that a copy of the foregoing was mailed on January 25, 2016 to counsel and all pro se parties of record as follows:

Edward J. Leavitt, Esq.  
25 Bluff Avenue  
West Haven, CT 06516

Amiel Dabush Dorel  
14 Marshall Lane  
Weston, CT 06883

/s/ Willaim A. Meehan  
William A. Meehan