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Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN THE COUNTY OF MARICOPA

Peter S. Davis, as Receiver of DenSco
Investment Corporation, an Arizona
corporation,

Plaintiff,

v.

U.S. Bank, NA, a national banking
organization; Hilda H. Chavez and John
Doe Chavez, a married couple; JPMorgan
Chase Bank, N.A., a national banking
organization; Samantha Nelson f/k/a
Samantha Kumbalek and Kristofer Nelson,
a married couple; and Vikram Dadlani and
Jane Doe Dadlani, a married couple,

Defendants.

No. CV2019-011499

**PLAINTIFF'S SEVENTH
SUPPLEMENTAL RULE 26.1
DISCLOSURE STATEMENT RE
DOCUMENT DEPOSITORY**

For its Seventh Supplemental Disclosure Statement, Plaintiff Peter S. Davis, as Receiver of DenSco Investment Corporation, sets forth the following in addition to its prior disclosure statements:

IX. RELEVANT DOCUMENTS

Chase Bank requested documents to be produced from the document depository. The documents requested are listed in the spreadsheet attached to this Supplement, along

1 with the prior case bates numbers and have been downloaded to the hard drive provided
2 by Chase Bank.

3
4 DATED this 13th day of July, 2021.

5 OSBORN MALEDON, P.A.

6 By 

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13 Attorneys for Plaintiff
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1 COPY of the foregoing served
2 via first-class mail (and courtesy copy emailed)
3 this 13th day of July, 2021, on:

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27 *Attorneys for Defendant JP Morgan Chase Bank, N.A.,*
28 *Samantha Nelson f/k/a Samantha Kumbalek,*
Kristofer Nelson, Vikram Dadlani, and Jane Doe Dadlani

29 

30 9043460

Documents Requested By Chase Bank from Depository

Box #	Contents	Bates	Source
1	Loan files (12/28/11-02/21/12)	D000001-002979	DenSco records scanned by ACC
2	Loan files (02/12/12-04/16/12)	D002980-004913	DenSco records scanned by ACC
3	Loan files (04/16/12-05/17/12)	D004914-008155	DenSco records scanned by ACC
4	Loan files (05/18/12-07/13/12)	D008156-010307	DenSco records scanned by ACC
5	Loan files (07/16/12-09/19/12)	D010308-012839	DenSco records scanned by ACC
6	Loan files (09/19/12-11/06/12)	D012840-015204	DenSco records scanned by ACC
7	Loan files (11/07/12-12/24/12)	D015205-018345	DenSco records scanned by ACC
8	Loan files (12/24/12-02/25/13)	D018346-020820	DenSco records scanned by ACC
9	Loan files (02/25/13-04/17/13)	D020821-023377	DenSco records scanned by ACC
10	Loan files (04/08/13-06/21/13)	D023378-025834	DenSco records scanned by ACC
11	Loan files (06/21/13-08/20/13)	D025835-027851	DenSco records scanned by ACC
12	Loan files (08/20/13-11/07/13)	D027852-029950	DenSco records scanned by ACC
13	Loan files (11/07/13-12/16/13)	D029951-033826	DenSco records scanned by ACC
14	Loan files (12/16/13-03/03/14)	D033827-035558	DenSco records scanned by ACC
15	Loan files (03/03/14-04/21/14)	D035559-036697	DenSco records scanned by ACC
16	Loan files (04/21/14-05/30/14)	D036698-037451	DenSco records scanned by ACC
17	Loan files (05/30/14-07/11/14)	D037452-038065	DenSco records scanned by ACC
18	Loan files (07/12/14-08/15/14)	D038066-038732	DenSco records scanned by ACC
19	Loan files (08/15/14-09/26/14)	D038733-039571	DenSco records scanned by ACC
20	Loan files (09/29/14-11/03/14)	D039572-040408	DenSco records scanned by ACC
21	Loan files (11/04/14-12/15/14)	D040409-041004	DenSco records scanned by ACC
22	Loan files (12/16/14-01/30/15)	D041005-043312	DenSco records scanned by ACC
23	Loan files (01/30/15-03/05/15)	D043313-044058	DenSco records scanned by ACC
24	Loan files (03/06/15-04/22/15)	D044059-046232	DenSco records scanned by ACC
25	Loan files (04/22/15-06/02/15)	D046233-048322	DenSco records scanned by ACC
26	Loan files (06/02/15-07/17/15)	D048323-050538	DenSco records scanned by ACC
27	Loan files (07/20/15-09/01/15)	D050539-052739	DenSco records scanned by ACC
28	Loan files (09/25/15-10/14/15)	D052740-054946	DenSco records scanned by ACC
29	Loan files (10/14/15-11/30/15)	D054947-056934	DenSco records scanned by ACC
30	Loan files (11/30/15-01/15/16)	D056935-058714	DenSco records scanned by ACC
31	Loan files (01/15/16-03/04/16)	D058715-060371	DenSco records scanned by ACC
32	Loan files (03/07/16-04/14/16)	D060372-062006	DenSco records scanned by ACC
33	Loan files (04/15/16-06/13/16)	D062007-063850	DenSco records scanned by ACC
34	Loan files (06/14/16 forward)	D063851-064304	DenSco records scanned by ACC
35	Loan files (10/10/08-01/29/09)	D064305-066557	DenSco records scanned by ACC
36	Loan files (02/02/09-04/30/09)	D066558-068952	DenSco records scanned by ACC
37	Loan files (05/01/09-07/16/09)	D068953-071523	DenSco records scanned by ACC
38	Loan files (07/16/09-09/29/09)	D071524-074289	DenSco records scanned by ACC

39	Loan files (09/30/09-01/28/10)	D074290-077302	DenSco records scanned by ACC
40	Loan files (02/01/10-05/25/10)	D077303-080015	DenSco records scanned by ACC
41	Loan files (05/26/10-08/20/10)	D080016-082923	DenSco records scanned by ACC
42	Loan files (08/24/10-12/31/10)	D082924-085463	DenSco records scanned by ACC
43	Loan files (01/01/11-04/05/11)	D085464-088165	DenSco records scanned by ACC
44	Loan files (04/06/11-06/02/11)	D088166-091187	DenSco records scanned by ACC
45	Loan files (08/04/11-10/27/11)	D091188-094091	DenSco records scanned by ACC
46	Loan files (08/04/11-10/27/11)	D094092-096554	DenSco records scanned by ACC
47	Loan files (10/27/11-12/28/11)	D096555-098924	DenSco records scanned by ACC
48	Current loan files (July 2016)	D098925-099231	DenSco records scanned by ACC
49	Current loan files (July 2016)	D099232-099570	DenSco records scanned by ACC
50	Current loan files (July 2016)	D099571-100459	DenSco records scanned by ACC
51	Financial & legal records (2015-2016)	D100460-101779	DenSco records scanned by ACC
52	Financial & legal records (2001-2005)	D101780-107394	DenSco records scanned by ACC
53	Financial & legal records (2006-2011)	D107395-111795	DenSco records scanned by ACC
55	Tax files (1988-2008)	D114910-118852	DenSco records scanned by ACC
56	Loan files	D118853-121015	DenSco records scanned by ACC
57	Loan files	D121016-122266	DenSco records scanned by ACC
58	Loan files	D122267-124430	DenSco records scanned by ACC
59	Loan files	D124431-126750	DenSco records scanned by ACC
60	Invoices, investor files	D126751-128731	DenSco records scanned by ACC
61	Loan files	D128732-130971	DenSco records scanned by ACC
62	Loan files	D130972-133111	DenSco records scanned by ACC
63	Past investor files	D133112-135602	DenSco records scanned by ACC
68-72	Miscellaneous records produced by Clark Hill	DIC0000001-0011917	Clark Hill (includes box 67)
75-77	Chase Bank production of statements, signature cards, checks, deposits, withdrawals, wires, etc. for Yomtov Menaged, et al. accounts ending in 1151, 8371, 5525, 8290, 1381, 5893, 6758.	DIC0016613-0025330	Chase Bank
88	DenSco Bank of America statement for account #004672028555 covering 2012, 2013, 2014	D147530-149699	Densco
95	Form 1120S US Income Tax Returns for DenSco Investment Corporation for 2011-2015	N/A	IRS
95	IRS correspondence and Form 1120S Tax Return Transcripts for DenSco Investment Corporation for 2013-2015	N/A	IRS
95	IRS correspondence and Form 1120S Tax Return Transcripts for DenSco Investment Corporation for 2014	N/A	IRS
95	K-1 and 1099 Form Transcripts for DenSco Investment Corporation for 2011-2015	N/A	IRS
95	IRS fax coversheets to Lisa Reilly and Form 1120S Tax Return Transcripts for DenSco Investment Corporation for 2014	N/A	IRS

95	K-1 and 1099 Form Transcripts for DenSco Investment Corporation for 2013-2015	N/A	IRS
95	Account Transcripts for DenSco Investment Corporation for 2013-2015	N/A	IRS
95	Preston CPA, PC's tax files for DenSco Investment Corporation, including Form 11205 US Income Tax Returns and work papers for 2010-2015	N/A	David Preston
95	10/24/16 cover letter, privilege log, and hard drive containing Denny Chittick's Yahoo emails	N/A	Gammage & Burnham
95	Bank statements, canceled checks, detailed wire spreadsheets, and correspondence for DenSco's FirstBank account ending in 5264	N/A	Densco/FirstBank
95	Bank statements and correspondence for the DenSco Defined Benefit Pension Plan's FirstBank account ending in 1963	N/A	Densco/FirstBank
96	Requested but not included with this production; under review by Receiver		
96	USB drive containing images from Denny Chittick's iPhone and iPad	N/A	Gammage & Burnham
96	USB drive containing Denny Chittick's Yahoo emails	N/A	Gammage & Burnham
96	QuickBooks files and audio file of recorded conversation between Scott Menaged and Denny Chittick	N/A	Gammage & Burnham
96	09/06/16 cover letter, privilege log, and CD containing electronic copies of the corporate logs/journals maintained by Denny Chittick	N/A	Gammage & Burnham
96	08/31/16 cover letter and USB drive containing various electronic files extracted from Denny Chittick's computer	N/A	Gammage & Burnham
96	09/29/16 cover letter and USB drive containing miscellaneous restored DropBox files	N/A	Gammage & Burnham
96	08/31/16 cover letter, privilege log, and DenSco legal files (redacted and unredacted): Legal 2012, Legal 2013, Legal 2014, 2016 Legal	N/A	Gammage & Burnham
96	10/24/16 cover letter, privilege log, and hard drive containing Denny Chittick's Yahoo emails	N/A	Gammage & Burnham
96	Hard drive and backup drive each containing data extracted by Forensic Consulting Solutions from American Furniture's computer and Scott Menaged's computer, iPhone, and AOL email account	N/A	Scott Menaged
96	Thumb drive containing "Hot Docs" identified by FCS from aforementioned devices	N/A	Scott Menaged
96	Thumb drive containing data extracted from Scott Menaged's iPhone	N/A	Scott Menaged
96	Printed transcript and exhibits from the deposition of Yomtov Scott Menaged (09/23/19-09/24/19)	N/A	Receiver
96	Printed transcript and exhibits from the depositions of Samantha Nelson (12/05/19) and Vikram Dadlani (12/12/19)	N/A	Receiver
96	Unusual Activity Reports filed by Samantha Nelson [JPMC001188]	JPMC001188	Chase Bank
96	Settlement Agreement between the Receiver and Clark Hill PLC, et al. (filed under seal)	N/A	Receiver

127	Copies of deposits for Easy Investments- B of A account #5496	DIC0025939-0028633	Bank of America
127	Wells Fargo production of Easy Investments account statements, including but not limited to, deposits and withdrawals for #2190 and #1944 12/12 through 1/13	DIC0025902-0025938	Wells Fargo
127	B of A bank statements from 1/10 through 1/13 for Easy Investments account #5496	DIC0025331-0025901	Bank of America
136	Bank statements including AZ Home Foreclosure LLC Menaged 0001-3956 at Chase #1151	Menaged0001-3956	Scott Menaged
137	CD (PHX007640) Bank of America production of checks from Easy Investments account #5496, including copies of checks over \$1,000 for 2010 and 2011	DIC0053951-0056082	Bank of America
137	Wells Fargo production of Easy Investments account statements, debit and credit items for accounts #1712 and #3296	DIC0056083-0056821	Wells Fargo
137	Wells Fargo production of all Menaged account statements, debit and credit items	DIC0056993-0057145	Wells Fargo
138	Requested but Receiver not able to produce as he does not have right to do so given software copyright		
138	QuickBooks Pro 2012 software	N/A	Furniture King
144	Investor Proof of Claim forms	N/A	Investors
145	Wells Fargo withdrawals for Yomtov Menaged, et al. accounts #2190, #1994, #5052, #2208, #5410, #6814, #1434	DIC0057146-0057200	Wells Fargo
145	Chase Bank transaction records for Yomtov Menaged, et al. accounts ending in 1151, 5893, 8371, and 6758	DIC0070481-0070516	Chase Bank
145	White envelope containing Bank of America production and Bates Stamped version on CD of transfer reports for Easy Investments account #5496	DIC0070517-0070559	Bank of America
145	Chase Bank transaction records for American Home Foreclosures account ending in 1151	DIC0070560-0070607	Chase Bank
145	Bank of America transfer records for Easy Investments account ending in 5496	DIC0070841-0070854	Bank of America
145	Opening account documents at Chase bank	DIC0070855-0070870	Chase Bank
145	Signature cards for Melinda Renee Morgan #0917, Charles G. Darling #4632 and #0904, Hope H Kopp #0715, Tam M Bui Minh Pham #3302	DIC0070871-0070882	Bank of America
145	Manilla envelope containing Bank of America production and Bates Stamped version on CD of: Signature Cards and Corporate Resolutions for: Keg Inspections #3572, DenSco Investment Corp. #7509 and #8555, Shining City Project, LLC #8162	DIC0070883-0070928	Bank of America
145	Manilla envelope containing Bank of America opening account documents for #1289, #1977, #0078 (Yomtov S. Menaged & Francine Lipari, Short Term Finance)	DIC0070929-0070949	Bank of America

145	CD from Osborn Maledon RE: DenSco Investment/Clark Hill produced documents which are supplemental documents Clark Hill produced	CH0013281-0013330	Clark Hill
148	CD containing documents supporting Receiver's solvency analysis, including miscellaneous spreadsheets and recorded documents extracted from public records	N/A	Receiver
149	Letter from Geoffrey Sturr to John Dewulf re: Clark Hill litigation dated 01/17/18	N/A	Osborn Maledon
149	CD (PHC009498) containing Bank of America production of bank records of Keg inspections, Inc. account #3572, Kelly & Richelle Griffin account #5398, Richelle Griffin account #7268, Richelle & Haley Griffin account #8625, Richelle & Kaleb Griffin account #8639, Kelly & Richelle Griffin account #6114	DIC0070950-0073060	Bank of America
149	CD (PHX009823) containing Bank of America production of cashier's checks and withdrawals for Keg Inspections, Inc. account #3572	DIC0073061-0073112	Bank of America
149	CD (PHC009972) containing Bank of America account opening documents and statement for Lorien and Kirk Fischer #9430, Fisher Family Holdings #4748, Lori L. Fischer #0552 7/2014-12/2015 & 6/2018, Nesta Capital #5514 7/2014-12/2015 & 12/2017	DIC0073113-0073588	Bank of America
149	Letter from the Receiver to Bank of America re: pre-receivership accounts dated 08/19/16	N/A	Receiver
149	CD (PHX010254) containing Chase Bank production of miscellaneous bank records for American Furniture account #9052	DIC0073589-0073954	Chase Bank
149	Chase Bank production of miscellaneous transaction records for American Furniture account 9052	DIC0080605-0080616	Chase Bank
149	CD (PHX010307) containing Bank of America production of miscellaneous bank records for Four Futures Corp. account 3185 [DIC0080617-0080774]	DIC0080617-0080774	Bank of America
150	CD (Densco 2359-003) containing Bank of America production of miscellaneous bank records for the following accounts: Easy Investments account 5496, Yomtov S. Menaged account 1289, Brandon S. Menaged AZUTMA account 0015, Scott Menaged account 2230, Yomtov S. Menaged & Francine A. Lipari account 1977, Yomtov Menaged account 8464, and Easy Investments, LLC credit card accounts 1661 and 0995 [DIC0080775-0081283]	DIC0080775-0081283	Bank of America
150	CD containing Bank of America production of statements for Easy Investments, LLC credit card accounts 6081 and 0995 [DIC0082117-0082249]	DIC0082117-0082249	Bank of America
150	DenSco Receivership Profit & Loss report as of 03/05/19	RECEIVER_005190-005192	Receiver
150	Densco-Menaged Cash Disbursements & Receipts 03 05 19.xlsx	RECEIVER_005193	Receiver
150	Menaged Loans 10.02.13-01.21.14.xlsx	RECEIVER_005194	Receiver
150	Cash Disbursements & Receipts.xlsx	RECEIVER_005196	Receiver

150	Analysis of Menaged Loans as of 01.09.14 -Priority Lien Calcs.xlsx	RECEIVER_005543	Receiver
151	Documents identified in Clark Hill's Ninth Supplemental Disclosure bates labeled CH_BOA_SDT_00000001-31	CH_BOA_SDT_00000001-31	Bank of America
51	2015 First Bank Records.pdf	D100857-100930	DenSco records scanned by ACC
53	2006 Bank of America Records.pdf	D107539-107819	DenSco records scanned by ACC
53	2007 Bank of America Records.pdf	D107973-108276	DenSco records scanned by ACC
53	2008 Bank of America Records.pdf	D108601-109119	DenSco records scanned by ACC
53	2009 Bank of America Records.pdf	D109199-109857	DenSco records scanned by ACC
53	2010 Bank of America Records (Acct7509).pdf	D110295-110630	DenSco records scanned by ACC
53	2010 Bank of America Records (Acct 8555).pdf	D110631-110952	DenSco records scanned by ACC
53	2011 Bank of America Records (Acct 7509). pdf	D111124-111674	DenSco records scanned by ACC
53	2011 Bank of America Records (Acct 8555).pdf	D111675-111795	DenSco records scanned by ACC
88	2012 Bank of America Records (Acct 8555).pdf	D147530-147764	DenSco records scanned by ACC
88	2013 Bank of America Records (Acct 8555).pdf	D147765-147961	DenSco records scanned by ACC
88	2014 Bank of America Records (Acct 8555).pdf	D147962-148176	DenSco records scanned by ACC
88	2012 Bank of America Records (Acct 7509).pdf	D148177-148877	DenSco records scanned by ACC
88	2013 Bank of America Records (Acct 7509).pdf	D148878-149352	DenSco records scanned by ACC
88	2014 Bank of America Records (Acct 7509).pdf	D149353-149699	DenSco records scanned by ACC
88	2014 First Bank Records.pdf	D150089-150101	DenSco records scanned by ACC