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13 Attorneys for Plaintiff

14 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

15 **IN THE COUNTY OF MARICOPA**

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

19 Plaintiff,

20 v.

21 U.S. Bank, NA, a national banking
22 organization; Hilda H. Chavez and John
23 Doe Chavez, a married couple; JPMorgan
24 Chase Bank, N.A., a national banking
25 organization; Samantha Nelson f/k/a
26 Samantha Kumbalek and Kristofer Nelson,
27 a married couple; and Vikram Dadlani and
28 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 

7 _____
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Attorneys for Plaintiff

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*



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