

Gregory J. Marshall (#019886)
Taryn J. Gallup (#035002)
Amanda Z. Weaver (#034644)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, Arizona 85004-2202
Telephone: 602.382.6000
gmarshall@swlaw.com
tgallup@swlaw.com
aweaver@swlaw.com

David B. Chenkin (*admitted pro hac vice*)
Kenneth C. Rudd (*admitted pro hac vice*)
ZEICHNER ELLMAN & KRAUSE, LLP
1211 Avenue of the Americas, 40th Floor
New York, NY 10036
212.223.0400
dchenkin@zeklaw.com
krudd@zeklaw.com

*Attorneys for Defendants U.S. Bank National
Association and Hilda H. Chavez*

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR 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;
JP MORGAN CHASE BANK, N.A., a
national banking organization;
SAMANTHA NELSON f/k/a
SAMANTHA KUMBALECK and
KRISTOFER NELSON, a married couple;
and VIKRAM DADLANI and JANE DOE
DADLANI, a married couple.

Defendants.

No. CV2019-011499

**THE U.S. BANK DEFENDANTS'
EIGHTH SUPPLEMENTAL
DISCLOSURE STATEMENT**

(Assigned to the Hon. Dewain D. Fox)

Defendants U.S. Bank National Association and Hilda H. Chavez (collectively, the
“U.S. Bank Defendants”) provide this Eighth Supplemental Disclosure Statement in
accordance with Ariz. R. Civ. P. 26.1.

1 **I. STATEMENTS**

2 Without conceding its relevancy or admissibility, the U.S. Bank Defendants
3 identify the following statement:

4 1. Declaration of Veronica Castro, dated July 31, 2022 and disclosed
5 contemporaneously with this Eighth Supplemental Disclosure Statement.

6
7 DATED this 19th day of August 2022.

8 SNELL & WILMER L.L.P.

9
10 By: 

11 Gregory J. Marshall
12 Taryn J. Gallup
13 Amanda Z. Weaver
14 One Arizona Center
15 400 E. Van Buren, Suite 1900
16 Phoenix, Arizona 85004-2202

17 David B. Chenkin
18 Kenneth C. Rudd
19 1211 Avenue of the Americas, 40th
20 Floor
21 New York, NY 10036

22 Attorneys for Defendants U.S. Bank
23 National Association and Hilda H.
24 Chavez
25
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CERTIFICATE OF SERVICE

The foregoing was served via e-mail on the following parties this 19th day of August 2022.

Colin F. Campbell, Esq.
Geoffrey M. T. Sturr, Esq.
Timothy J. Eckstein, Esq.
Joseph N. Roth, Esq.
John S. Bullock, Esq.
BriAnne N. Illich Meeds, Esq.
Osborn Maledon, P.A.
2929 N. Central Avenue, Suite 2100
Phoenix, Arizona 85012
ccampbell@omlaw.com
gsturr@omlaw.com
teckstein@omlaw.com
jroth@omlaw.com
jbullock@omlaw.com
billichmeeds@omlaw.com
Attorneys for Plaintiff

Nicole Goodwin, Esq.
Adrianna Griego Gorton, Esq.
Greenburg Traurig, LLP
2375 E. Camelback Road Suite 800
Phoenix, Arizona 85016
goodwinn@gtlaw.com
gortona@gtlaw.com

Paul J. Ferak, Esq.
Jonathan H. Claydon, Esq.
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
ferakp@gtlaw.com
claydonj@gtlaw.com

*Attorneys for Defendants JP Morgan Chase
Bank, Samantha Nelson, Kristofer Nelson,
Vikram Dadlani, and Jane Doe Dadlani*

/s/ 

4887-8232-9901

Gregory J. Marshall (#019886)
Amanda Z. Weaver (#034644)
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DADLANI, a married couple.

Defendants.

No. CV2019-011499

**DECLARATION OF
VERONICA CASTRO**

I, Veronica Castro, declare as follows:

1. I am over eighteen (18) years old and reside in Maricopa County, Arizona.
I am competent to testify to the facts stated in this declaration, which are based on my
personal knowledge. If called to testify, I could and would testify to the following.
2. In early 2014, I was working for Scott Menaged and his businesses as an
office manager / assistant.
3. At that time, I was working from an office at one of Scott's businesses, a
furniture store called Furniture King.

1 4. The closest U.S. Bank branch location to my office was the branch located
2 in Arrowhead Frys in Glendale, Arizona.

3 5. Scott maintained a business account at U.S. Bank, I believe in the name of
4 Easy Investments, LLC, a business through which he purchased homes at auction.

5 6. I occasionally assisted Scott in his home buying business by obtaining
6 cashier's checks to purchase homes at auction.

7 7. I would advise whatever teller was available at the branch of the names of
8 the payees and the amounts for the cashier's checks that were needed.

9 8. Sometimes I would return the cashier's checks for deposit, advising the
10 tellers that the checks were not needed.

11 9. When the cashier's checks were deposited, I would write "not used for
12 purpose intended" or something similar on the back of the checks.

13 10. I remember tellers asking me why cashier's checks were not used, and I
14 told them because the homes were no longer available or because the auction bids were
15 lost.

16 11. I never talked to U.S. Bank employees about DenSco, its involvement in
17 Scott's business, or details about Scott's auction business.

18 12. I never asked U.S. Bank to waive hold periods, if there were any, on
19 cashier's checks that were deposited into Scott's business account, and I'm not aware of
20 U.S. Bank ever saying there were hold periods.

21 13. Scott also banked at Chase. Because there was a Chase branch location
22 close to where Scott kept his office, I believe he handled his Chase bank transactions
23 himself.

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

25 Dated this 31 day of July 2022.

26
27 
28 Veronica Castro

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