

STATE OF NEW YORK  
SURROGATES COURT ORANGE COUNTY

PROBATE PROCEEDING, WILL OF,

**MARY LOUISE PERES,**

DECEASED.

**AFFIDAVIT OF**  
**ALAN BALSDON**

File No.: 2023-262

STATE OF NEW YORK     )  
COUNTY OF ERIE        ) ss.:

Alan Balsdon being duly sworn, deposes and says under penalty of perjury:

1. I am currently the Chairperson of The Distributive Education Clubs of New York (DECA NY), and I submit this affidavit in support of DECA NY's Verified Claim and its Petition to Remove Administrator (the Petition).

2. DECA NY submits its Verified Claim and Petition following its discovery that the decedent, Mary Peres, diverted an estimated \$1,717,503.90 between December 1, 2015, and her death.

3. This affidavit is divided into four parts. Part I provides background information about DECA NY, my role with DECA NY as Chairperson, and the foundation for my statements in this affidavit. Part II provides an overview of Mary Peres's role at DECA NY, including her access to DECA NY's bank account. Part III explains DECA NY's recent discovery of evidence of Mary Peres's diversion of DECA NY funds. Part IV includes evidence showing that, between December 1, 2015, and the death of Mary Peres in late 2022, Mary Peres wrongfully diverted an estimated \$1,717,503.90 of DECA NY's funds.

**PART I**  
**BACKGROUND INFORMATION AND FOUNDATION**

4. DECA NY is a non-profit organization incorporated by the Regents of the University of the State of New York, designed to prepare emerging leaders in high school in the areas of marketing, finance, hospitality, and management.

5. DECA NY is governed by a Board of Trustees. Trustees are unpaid volunteers. Typically, Trustees are current or former New York State teachers.

6. I am currently a Trustee and the Chairperson of DECA NY. I have served as a Trustee of DECA NY since 2007. My term as Chairperson of DECA NY began on July 1, 2023.

7. As the Chairperson, and from my tenure as a Trustee, I am familiar with the mission, functions, and categories of expenditures of DECA NY. I make this affidavit on personal knowledge or, where indicated, on the basis of records that I have reviewed.

**PART II**  
**MARY PERES'S ROLE WITH DECA NY**

8. Mary Peres was a long-serving Trustee of DECA NY. I served alongside her on the DECA NY Board from the time I joined DECA NY as a Trustee in 2007 until the time of Mary Peres's death in late 2022.

9. Mary Peres held positions of trust with DECA NY as a Trustee. I have reviewed historic records of DECA NY. Those records reflect that Mary Peres served as a DECA NY Trustee for more than a decade, including as DECA Chairperson. Those records further reflect that, from 2009 through her death in late 2022, Mary Peres was a Trustee designated as either the Charter Association Advisor or the New York DECA State Advisor.

10. DECA NY's primary address, for more than a decade, was Mary Peres's home address. The DECA NY website reflects that, since at least 2013 and until Mary Peres's death,

DECA NY's address has been listed as 285 Hill Road, Goshen, New York 10924. That was Mary Peres's address, as reflected in the Petition for Letters of Administration filed with this Court.

11. Since at least December 2015 and through the time of Mary Peres's death, DECA NY bank statements were sent solely to Mary Peres at her home. I have reviewed year-end bank statements from two DECA NY accounts with TD Bank for the period between December 2015 and December 2022. Each such statement is addressed solely to Mary Peres's address at 285 Hill Road, Goshen, New York 10924.

12. Since at least 2016 and through the time of Mary Peres's death, DECA NY checks also solely carried the home address of Mary Peres: 285 Hill Road, Goshen, New York 10924. I have reviewed checks throughout that time period, and copies of some of those checks are included in this affidavit in Part III, below. Those copies state the 285 Hill Road address.

13. Since at least 2016 and through the time of Mary Peres's death, Mary Peres had signature authority on DECA NY checks. That authority is reflected on the face of the checks themselves. I have reviewed checks throughout that time period, and copies of some of those checks are included in this affidavit in Part III, below. Those copies are signed in the name of Mary Peres.

### **PART III DECA NY'S DISCOVERY OF MARY PERES'S DIVERSION OF FUNDS**

14. According to the Petition for Letters of Administration filed with this Court, Mary Peres passed away on November 27, 2022. I learned of Mary Peres's death sometime thereafter.

15. At the time of Mary Peres's death, I did not have copies of bank statements from DECA NY's bank accounts. On February 27, 2023, the Board of Trustees of DECA NY created

a Special Committee to examine the finances of the organization, particularly as to any actions by Mary Peres. The Board appointed me as the Chair of that Special Committee.

16. The Special Committee endeavored to obtain historic bank records. Ultimately, the Special Committee was able to obtain records from DECA NY's accounts dating back to December 2015.

#### **PART IV EVIDENCE OF MARY PERES'S DIVERSION OF FUNDS**

17. DECA NY's bank records show that, beginning in at least December 2015, Mary Peres diverted at least \$1,717,503.90 of DECA NY funds.

18. This evidence shows that Mary Peres regularly wrote checks from DECA NY's bank account and authorized withdrawals from DECA NY's bank account for expenses that were not authorized by DECA NY and served no DECA NY business purpose. Such diversion included checks to Mary Peres's family members, checks written to Mary Peres's personal business, checks written to Mary Peres personally and deposited in her personal business bank accounts, retail purchases, medical expenses, and numerous ATM withdrawals. The Special Committee created a summary spreadsheet of these items, attached as **Exhibit A**.

19. For the convenience of the Court, this part of this affidavit is divided into sections A through F. Section A provides evidence of checks written by Mary Peres to her family members; section B provides evidence of checks written by Mary Peres to herself and deposited into her family business; section C provides evidence of checks written by Mary Peres to her family business; section D provides evidence of withdrawals for retail purchases; section E provides evidence of withdrawals for medical and veterinary expenses; and section F provides evidence of ATM withdrawals near Mary Peres's home.

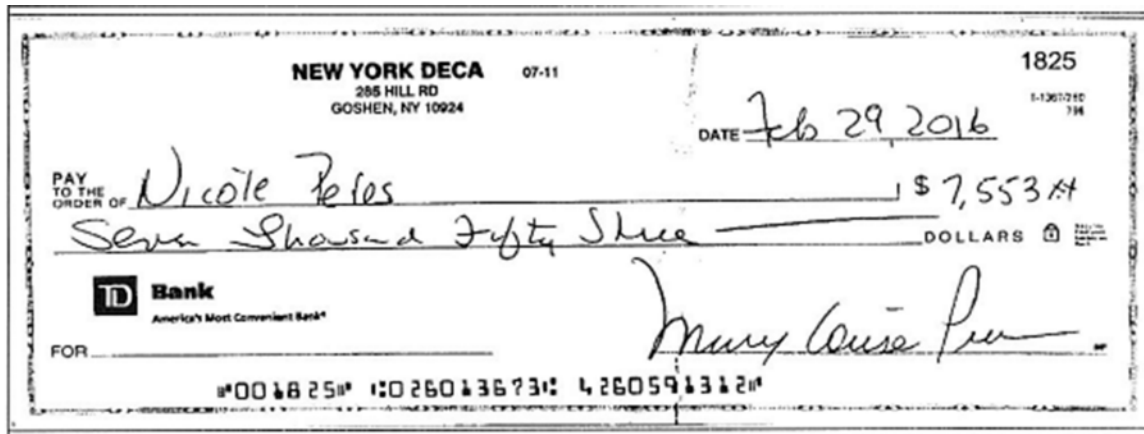
**A. Checks Written Directly to Family Members**

20. The Special Committee has compiled and reviewed checks that Mary Peres wrote to her son, Christopher Peres, to her daughter, Nicole Peres. In the period since December 2015, the Special Committee has identified checks to Christopher Peres totaling \$397,351.00 and checks to Nicole Peres totaling \$418,592.00. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.

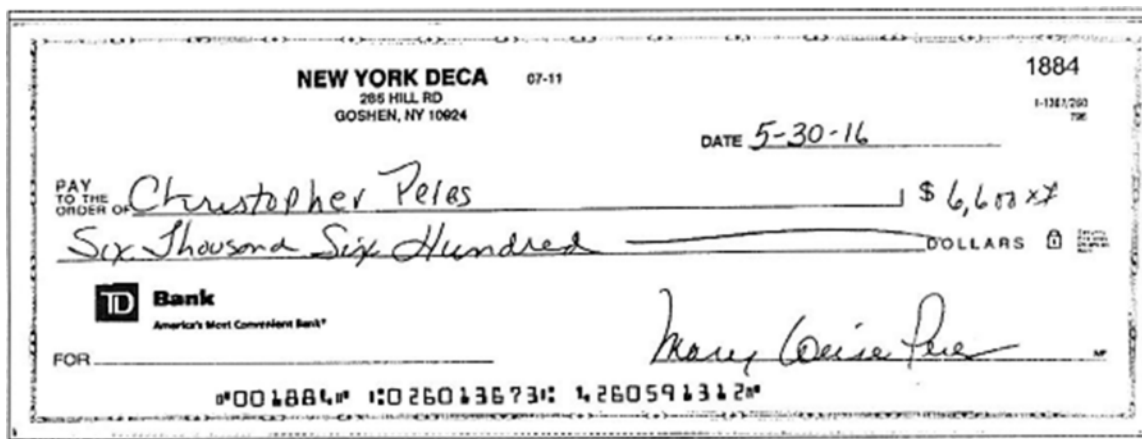
21. As noted, I have been a Trustee of DECA NY since 2007. Based on my personal knowledge, and after speaking with other Trustees, Christopher Peres performed only discrete storage and transportation services for DECA NY, which were listed on the memo line of the checks by which he was paid. Specifically, Christopher Peres, in connection with the annual conferences, was responsible for loading a storage container with materials for conferences and coordinating delivery of such materials to a convention center. Based on my personal knowledge, and after speaking with other Trustees, neither Christopher Peres nor Nicole Peres ever performed any other services for DECA NY or ever purchased other supplies or items for DECA NY. To the best of my knowledge, none of the checks identified here—none of which have any information on the memo line—reflect any expense that furthered any legitimate DECA NY business purpose.

22. This affidavit includes copies of some of those checks from bank records.

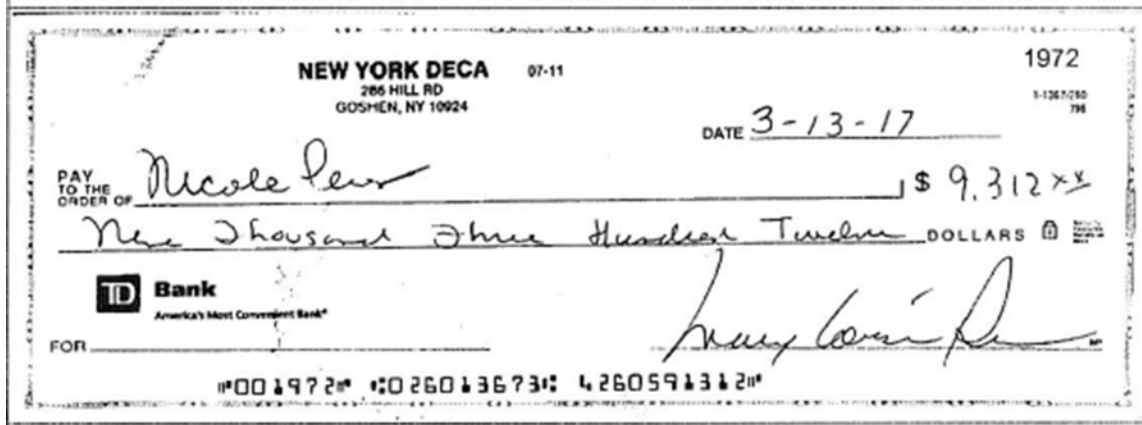
23. On a check dated February 29, 2016, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres in the sum of \$7,553. The memo line is empty. A true and accurate copy of this check is reproduced below.



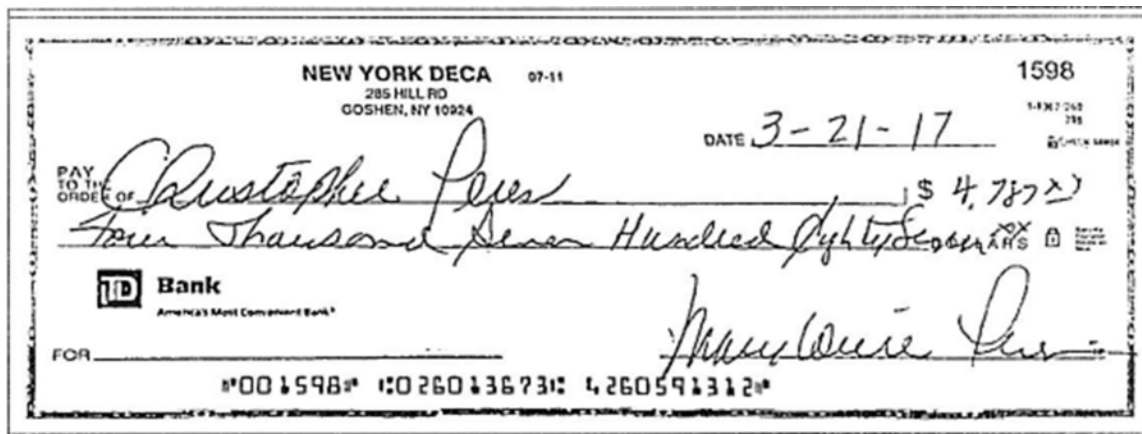
24. On a check dated May 30, 2016, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$6,600. The memo line is empty. A true and accurate copy of this check is reproduced below.



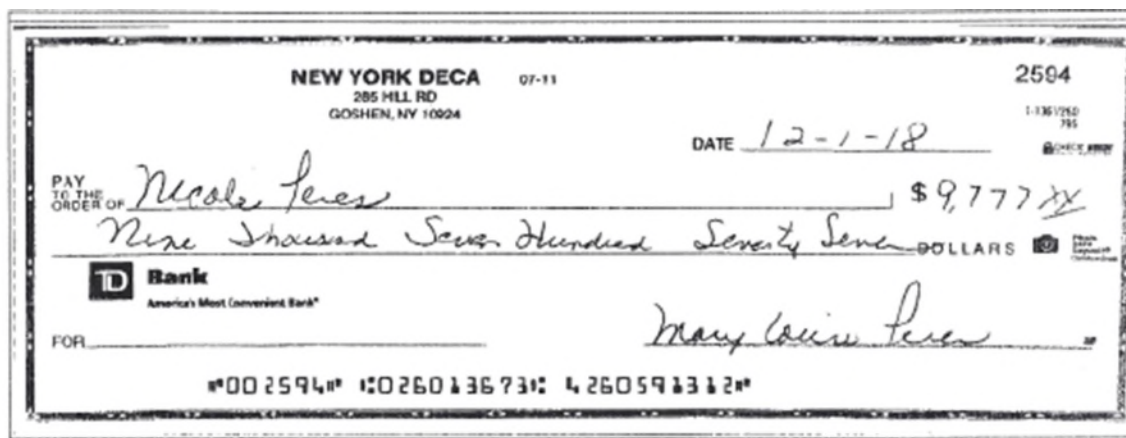
25. On a check dated March 13, 2017, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres for \$9,312. The memo line is empty. A true and accurate copy of this check is reproduced below.



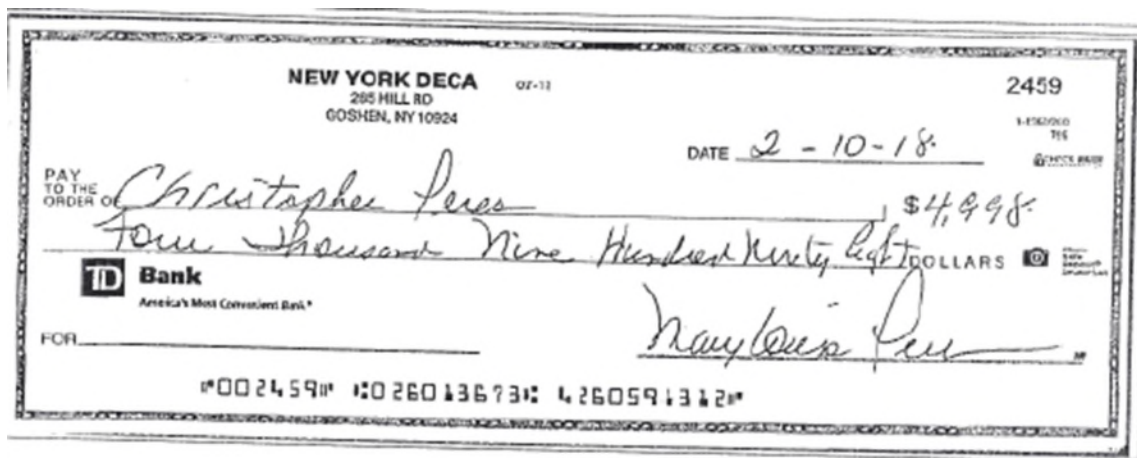
26. On a check dated March 21, 2017, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$4,787. The memo line is empty. A true and accurate copy of this check is reproduced below.



27. On a check dated December 1, 2018, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres for \$9,777. The memo line is empty. A true and accurate copy of this check is reproduced below.

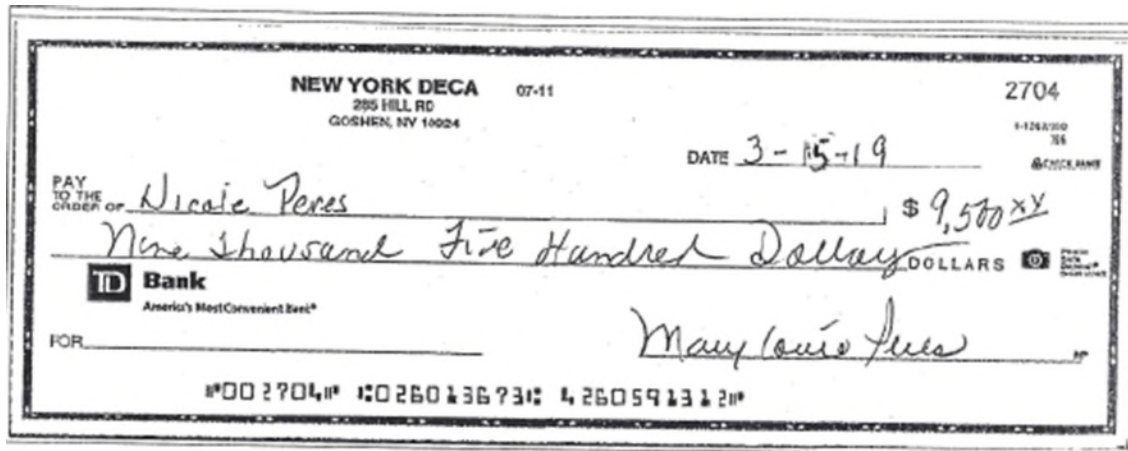


28. On a check dated February 10, 2018, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$4,998. The memo line is empty. A true and accurate copy of this check is reproduced below.

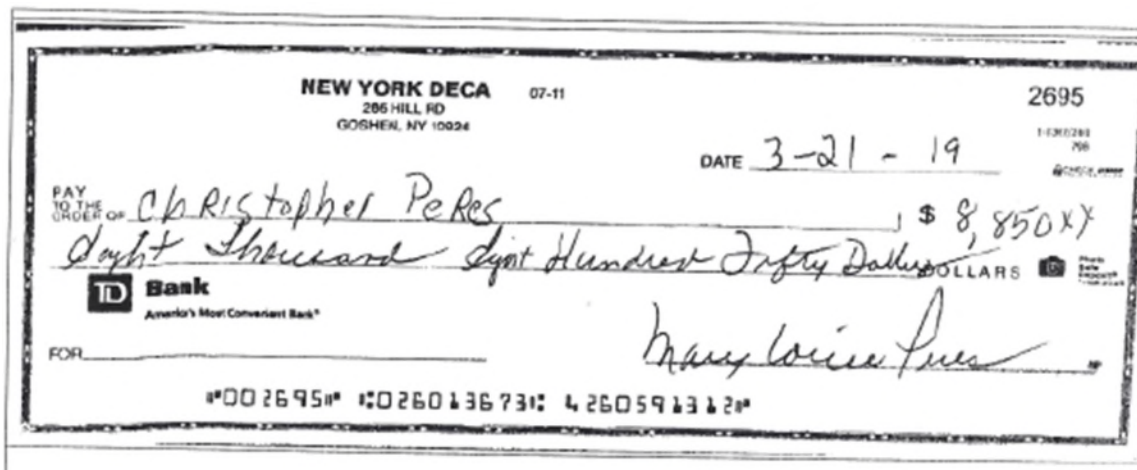


29. On a check dated March 15, 2019, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres for \$9,500. The memo line is empty. A true and accurate copy of this check is reproduced below.

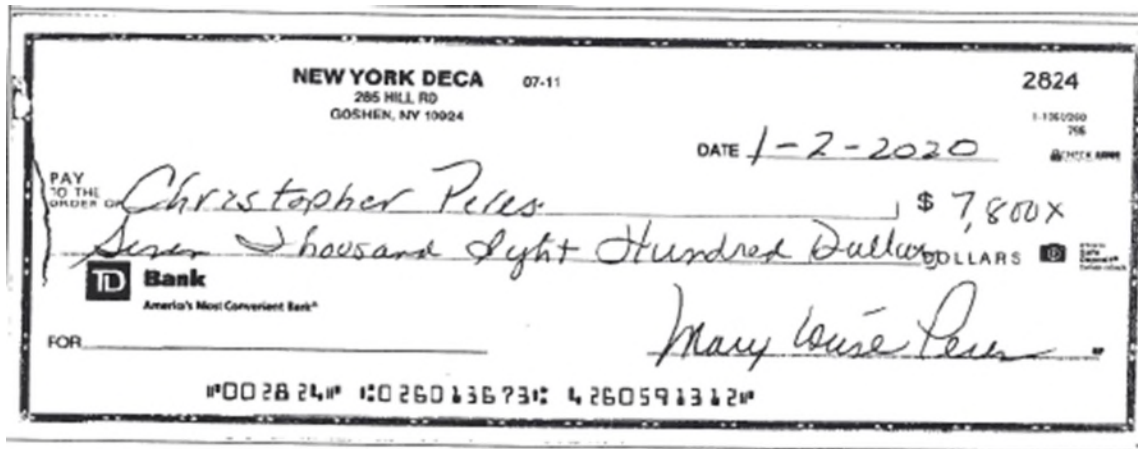




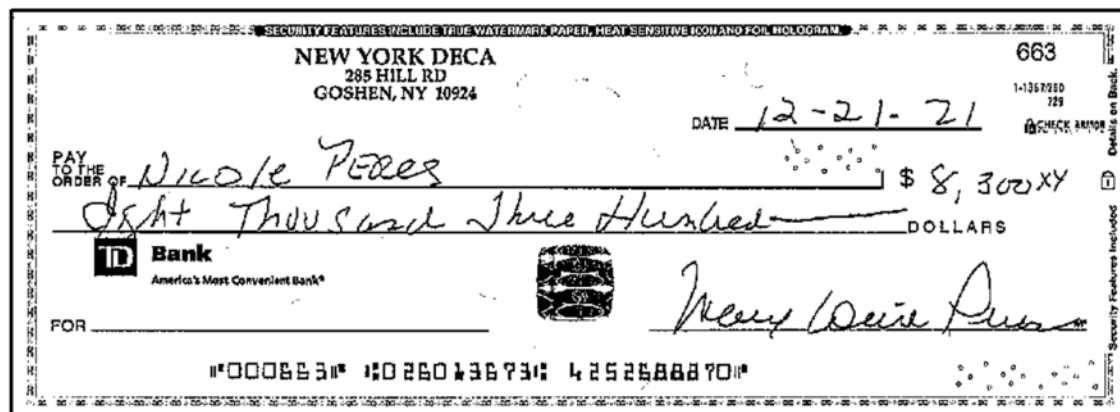
30. On a check dated March 21, 2019, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$8,850. The memo line is empty. A true and accurate copy of this check is reproduced below.



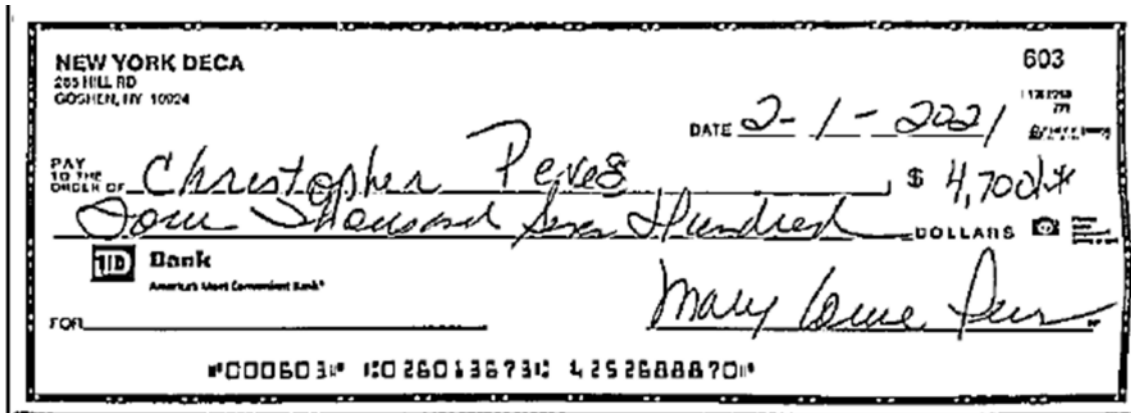
31. On a check dated January 1, 2020, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$7,800. The memo line is empty. A true and accurate copy of this check is reproduced below.



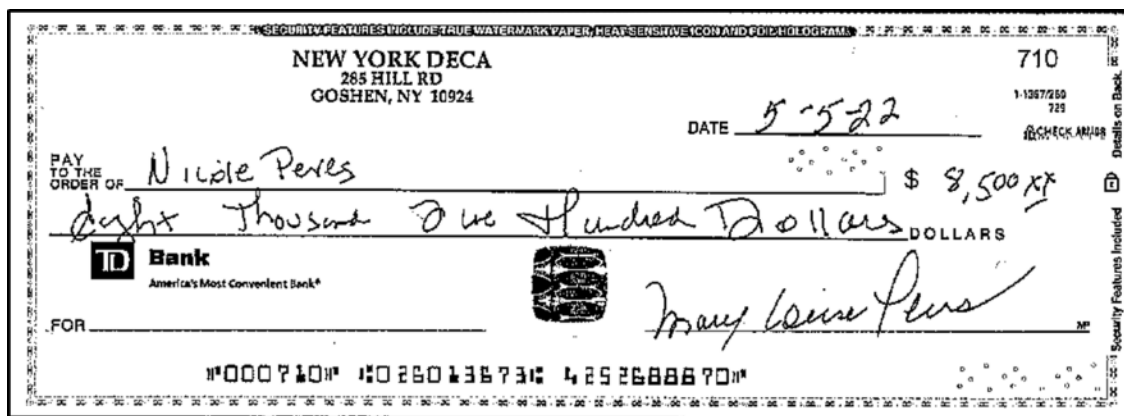
32. On a check dated December 21, 2021, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres for \$8,300. The memo line is empty. A true and accurate copy of this check is reproduced below.



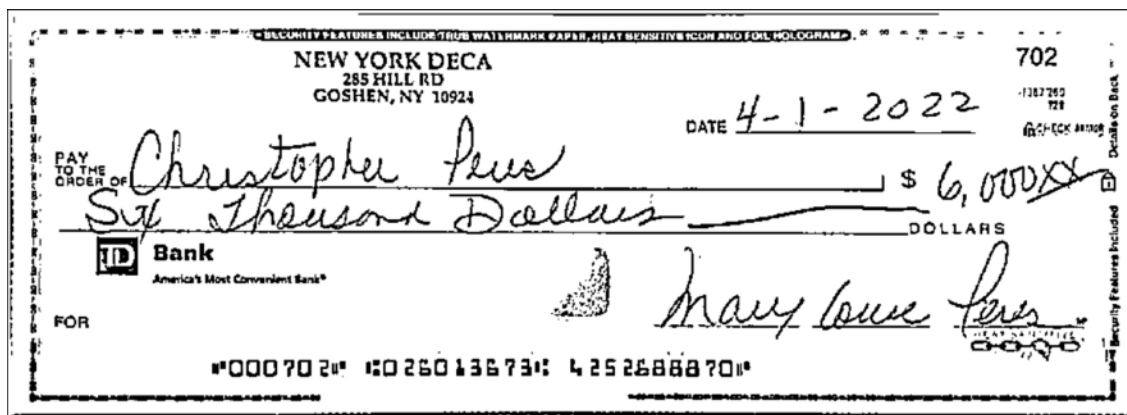
33. On a check dated February 1, 2021, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$4,700. The memo line is empty. A true and accurate copy of this check is reproduced below.



34. On a check dated May 5, 2022, Mary Peres's name appears on the signature block of a DECA NY check payable to Nicole Peres for \$8,500. The memo line is empty. A true and accurate copy of this check is reproduced below.



35. On a check dated April 1, 2022, Mary Peres's name appears on the signature block of a DECA NY check payable to Christopher Peres for \$6,000. The memo line is empty. A true and accurate copy of this check is reproduced below.



**B. Checks Written Directly to Mary Peres and Deposited Into Her Business**

36. The Special Committee has compiled and reviewed checks that Mary Peres wrote to herself and deposited into a bank account for Seven Meadows Farms. In the period since December 2015, the Special Committee has identified such checks totaling \$206,207.42. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.


37. Seven Meadows Farm shares the same address as Mary Peres. I have visited the website for Seven Meadows Farm, <https://www.seven-meadows-farm.net/>. Under the “Contact Us” page, the website lists the same address as Mary Peres’s residence, 285 Hill Road, Goshen, New York 10924. The Petition for Letters of Administration filed with this Court describes Mary Peres’s assets to include the “House, barn, and lot at 285 Hill Road, Goshen, New York 10924.”

38. As noted, I have been a Trustee of DECA NY since 2007. Based on my personal knowledge, and after speaking with other Trustees, I have no reason to believe that Seven Meadows Farm ever performed services or hosted events for DECA NY or purchased supplies or items for DECA NY. To the best of my knowledge, none of the checks identified reflect any expense that furthered any legitimate DECA NY business purpose.

39. This affidavit includes copies of some of those checks from bank records.

40. On a check dated April 14, 2016, Mary Peres's name appears on the signature block of a DECA NY check payable to herself in the sum of \$5,313. The memo line is empty. The stamp below the endorsement on the back of the check reads "PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 // . . . // FOR DEPOSIT ONLY SEVEN MEADOWS FARM." I understand that endorsement to reflect that this check was deposited into the Seven

Meadows Farm bank account. A true and accurate copy of the front and back of the check is reproduced below.

<b>NEW YORK DECA</b> 07-11		1870
285 HILL RD GOSHEN, NY 10924		1-800-288-778
DATE <u>4-14-16</u>		
PAY TO THE ORDER OF <u>MARY Peres</u>	\$ <u>5,313.00</u>	
<u>Five Thousand Three Hundred Thirteen</u> DOLLARS		
 <b>Bank</b> America's Most Convenient Bank®	<u>Mary Louise Peres</u>	
FOR _____		
⑆001870⑆ ⑆026013673⑆ 4260591312⑆		

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Account: 4260591312  
Amount: 5,313.00  
PosiDate: 20160419  
Tran\_ID: 560855646  
CheckNum: 1870  
DIN: 560856516  
ReturnReasonCode:  
ReturnReasonDescription:  
Orig\_DIN: 560856516  
ECEItemSeqNum: 001070528568

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Account: 4260591312  
Amount: 5,313.00  
PosiDate: 20160419  
Tran\_ID: 560855646  
CheckNum: 1870  
DIN: 560856516  
ReturnReasonCode:  
ReturnReasonDescription:  
Orig\_DIN: 560856516  
ECEItemSeqNum: 001070528568

41. On a check dated November 21, 2017, Mary Peres's name appears on the signature block of a DECA NY check payable to herself in the sum of \$5,151. The memo line is empty. The stamp below the endorsement on the back of the check reads "PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 // . . . // FOR DEPOSIT ONLY SEVEN MEADOWS FARM." I understand that endorsement to reflect that this check was deposited into the Seven Meadows Farm bank account. A true and accurate copy of the front and back of the check is reproduced below.

NEW YORK DECA 07-11		2228
285 HILL RD GOSHEN, NY 10924		1 1367751 796
PAY TO THE ORDER OF <i>Mary Peres</i>	DATE <i>11-21-17</i>	\$ <i>5,151.23</i>
<i>Five Thousand One Hundred Fifty One Dollars</i>		DOLLARS
TD Bank America's Most Convenient Bank®		
FOR: <i>Mary Peres</i>		
⑆002228⑆ ⑆026013673⑆ 4260591312⑆		

Account: 4260591312  
Amount: 5,151.00  
PostDate: 20171124  
Tran\_ID: 513676686  
CheckNum: 2228  
DIN: 513677751  
ReturnReasonCode:  
ReturnReasonDescription:  
Orig\_DIN: 513677751  
ECEItemSeqNum: 009490865971

PAY TO THE ORDER OF  
CHASE GOSHEN, NEW YORK 10924  
FOR DEPOSIT ONLY  
SEVEN MEADOWS FARM  
⑆002228⑆ ⑆026013673⑆ 4260591312⑆

Account: 4260591312  
Amount: 5,151.00  
PostDate: 20171124  
Tran\_ID: 513676686  
CheckNum: 2228  
DIN: 513677751  
ReturnReasonCode:  
ReturnReasonDescription:  
Orig\_DIN: 513677751  
ECEItemSeqNum: 009490865971

42. On a check dated May 5, 2018, Mary Peres's name appears on the signature block of a DECA NY check payable to herself in the sum of \$9,150. The memo line is empty. The stamp below the endorsement on the back of the check reads "PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 // . . . // FOR DEPOSIT ONLY SEVEN MEADOWS FARM." I understand that endorsement to reflect that this check was deposited into the Seven Meadows Farm bank account. A true and accurate copy of the front and back of the check is reproduced below.

<b>NEW YORK DECA</b> CF-11		2553
285 HILL RD GOSHEN, NY 10924		11/13/2008
DATE <u>5-5-18</u>		
PAY TO THE ORDER OF <u>Mary Peres</u>	\$ <u>9,150</u> <sup>00/100</sup>	
<u>Nine thousand one hundred fifty</u> DOLLARS		
<b>TD Bank</b> America's Most Convenient Bank®	<u>Mary Peres</u>	
FOR _____		
⑆002553⑆ ⑆026013673⑆ 4260591312⑆		

Account: 4200591312
Amount: 9,150.00
PostDate: 20180507
Tran_ID: 535960901
CheckNum: 2553
DIN: 535961376
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 535961376
ECEItemSeqNum: 009670428699

PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 FOR DEPOSIT ONLY SEVEN MEADOWS FARM 809077100
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Account: 4200591312
Amount: 9,150.00
PostDate: 20180507
Tran_ID: 535960901
CheckNum: 2553
DIN: 535961376
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 535961376
ECEItemSeqNum: 009670428699



43. On a check dated May 20, 2019, Mary Peres's name appears on the signature block of a DECA NY check payable to herself in the sum of \$6,500. The memo line is empty. The stamp below the endorsement on the back of the check reads "PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 // . . . // FOR DEPOSIT ONLY SEVEN MEADOWS FARM." I understand that endorsement to reflect that this check was deposited into the Seven Meadows Farm bank account. A true and accurate copy of the front and back of the check is reproduced below.

<b>NEW YORK DECA</b> 07-11		2769
285 HILL RD GOSHEN, NY 10924		1-1200200 155
DATE <u>5-20-19</u>		CHECK AMT
PAY TO THE ORDER OF <u>MARY PERES</u>	\$ <u>6,500.00</u>	
<u>Six Thousand &amp; no Hundred</u>	DOLLARS	
<b>TD Bank</b> America's Most Convenient Bank®		
FOR _____	<u>Mary Louise Peres</u>	
⑆002769⑆ ⑆026013673⑆ ⑆260591312⑆		

Account: 4260591312
Amount: 6,500.00
PostDate: 20190530
Tran_ID: 509305231
CheckNum: 2769
DIN: 509306706
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 509306706
ECEItemSeqNum: 006080695534

PAY TO THE ORDER OF CHASE GOSHEN, NEW YORK 10924 FOR DEPOSIT ONLY SEVEN MEADOWS FARM 4260591312
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**C. Checks Written Directly to Personal Business and Associated Company**

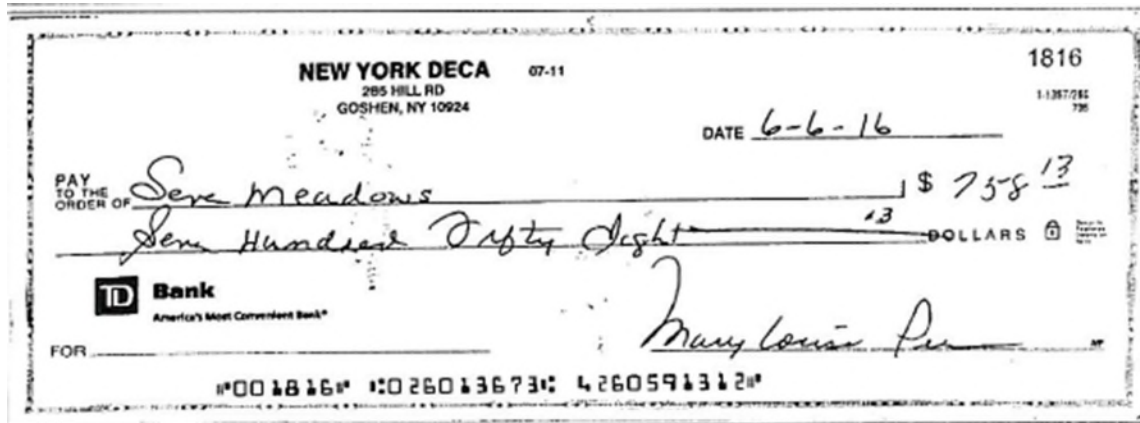
44. The Special Committee has compiled and reviewed checks that Mary Peres wrote directly to Seven Meadows Farm and to Hudson Valley Property Maintenance. In the period since December 2015, the Special Committee has identified checks written directly to Seven Meadows Farm totaling \$22,817.13 and checks to Hudson Valley Property Maintenance totaling \$9,000.00. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.

45. I have reviewed the Hudson Valley Property Maintenance website at <https://hvpropertymaintenanceinc.com/about-us/>. The “About Us” page explains that the business employs “experienced landscape professionals.” I understand that Seven Meadows Farm is located within the Hudson Valley.

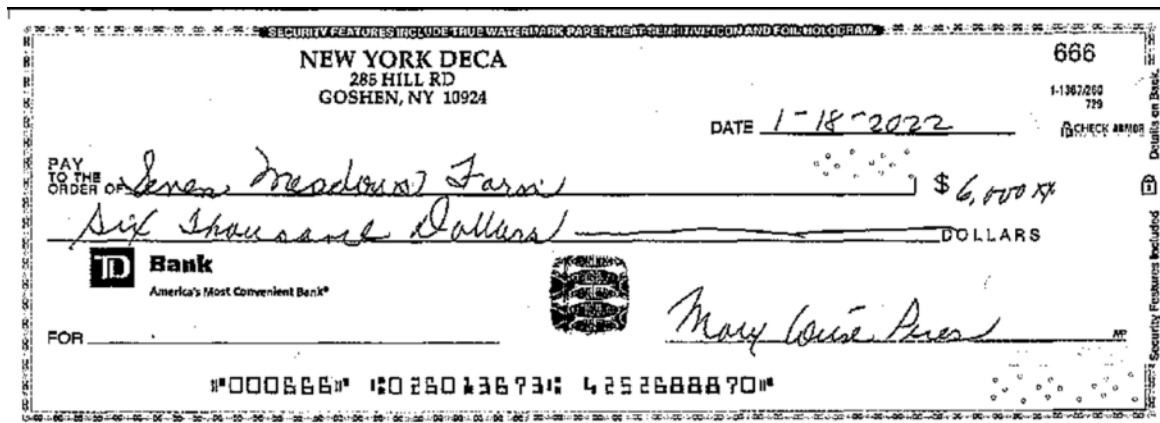
46. As noted, I have been a Trustee of DECA NY since 2007. Based on my personal knowledge, and after speaking with other Trustees, I have no reason to believe that Hudson Valley Property Maintenance ever performed any services for DECA NY or ever purchased supplies or items for DECA NY. To the best of my knowledge, none of the checks identified reflect any expense that furthered any legitimate DECA NY business purpose.

47. This affidavit includes copies of some of those checks from bank records.

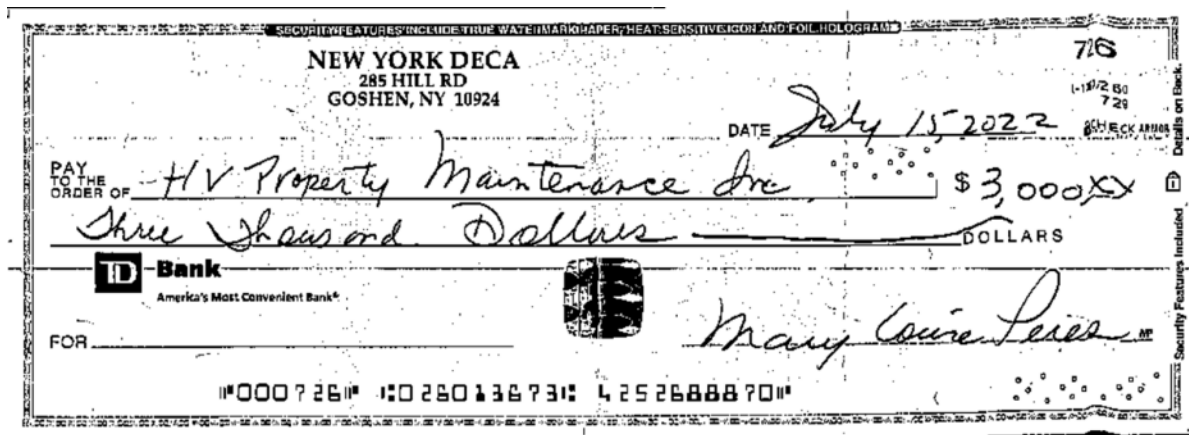
48. On a check dated June 6, 2016, Mary Peres's name appears on the signature block of a DECA NY check payable to Seven Meadows Farm in the sum of \$758.13. The memo line is empty. A true and accurate copy of this check is reproduced below.



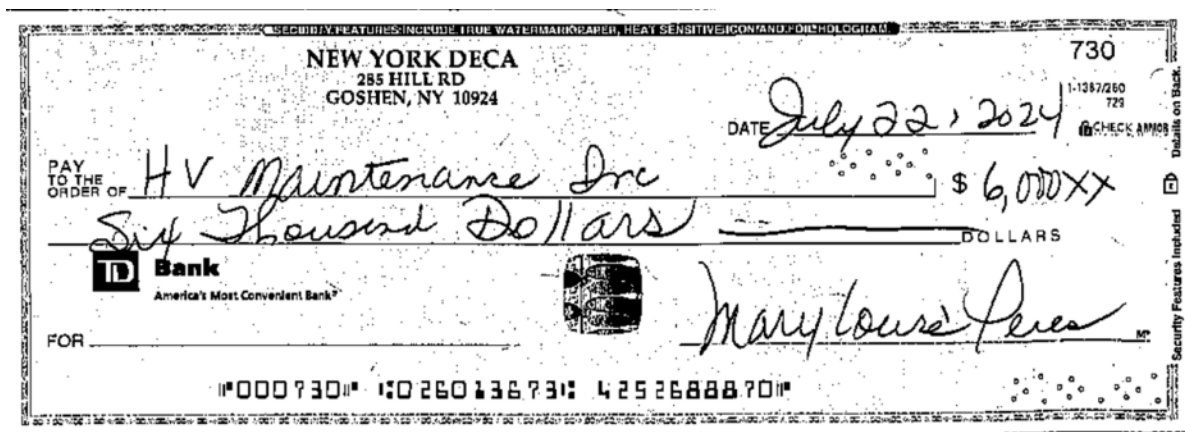
49. On a check dated January 18, 2022, Mary Peres's name appears on the signature block of a DECA NY check payable to Seven Meadows Farm in the sum of \$6,000. The memo line is empty. A true and accurate copy of this check is reproduced below.



50. On a check dated July 15, 2022, Mary Peres's name appears on the signature block of a DECA NY check payable to Hudson Valley Property Maintenance in the sum of \$3,000. The memo line is empty. A true and accurate copy of this check is reproduced below.



51. On a check dated July 22, 2022, Mary Peres's name appears on the signature block of a DECA NY check payable to Hudson Valley Property Maintenance in the sum of \$6,000. The memo line is empty. A true and accurate copy of this check is reproduced below.



#### **D. Bank Payments for Retail Purchases**

52. The Special Committee has compiled and reviewed withdrawals for unauthorized retail purchases. In the period since December 2015, the Special Committee has identified such purchases totaling \$273,271.29. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.

53. As noted, I have been a Trustee of DECA NY since 2007. Based on my personal knowledge, and after speaking with other Trustees, I have no reason to believe that any of the retail purchases identified here were for supplies or items for DECA NY. To the best of my knowledge, none of the purchases identified reflect any expense that furthered any legitimate DECA NY business purpose.

54. This affidavit includes copies of some of those purchases from bank records.

55. DECA NY's November 2020 bank statement lists a withdrawal for a purchase at "Easy Spirit" on November 12, 2020, for \$155.14. A true and accurate excerpt from that bank statement is reproduced below.

11/12	DEBIT CARD PURCHASE, AUT 111120 VISA DDA PUR SP EASY SPIRIT HTTPSMFFEASYS * CT 4085404006587269	155.14
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56. DECA NY's November 2018 bank statement lists a withdrawal for a purchase at "PetSmart" on November 6, 2018, for \$119.92. A true and accurate excerpt from that bank statement is reproduced below.

11/06	DEBIT POS, AUT 110618 DDA PURCHASE PETSMART 1179 MIDDLETOWN * NY 4085404006949386	235.20 119.92
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57. DECA NY's November 2021 bank statement lists a withdrawal for a purchase at "Big Dee's Tack" on November 16, 2021, for \$443.80. A true and accurate excerpt from that bank statement is reproduced below.

11/16	DEBIT CARD PURCHASE, AUT 111521 VISA DDA PUR BIG DEES TACK 330 626 5000 * OH 4085404006587269	443.80
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#### **E. Bank Payments for Medical and Veterinarian Expenses**

58. The Special Committee has compiled and reviewed withdrawals for unauthorized veterinary and medical expenses. In the period since December 2015, the Special Committee has

identified such purchases totaling \$19,331.06. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.

59. As noted, I have been a Trustee of DECA NY since 2007. Based on my personal knowledge, and after speaking with other Trustees, I have no reason to believe that DECA NY has incurred any legitimate veterinary or medical expenses. To the best of my knowledge, none of the purchases identified reflect any expense that furthered any legitimate DECA NY business purpose.

60. This affidavit includes copies of some of those purchases from bank records.

61. DECA NY's February 2022 bank statement lists a withdrawal for a purchase at "SQ DINAH SKORICH" on February 3, 2022, for \$4,446. I have visited the website <https://www.equilibriumvetservices.com/about>, which lists Dr. Dinah Skorich as a horse veterinarian. The "contact" page at <https://www.equilibriumvetservices.com/contact10> lists an address in Goshen, NY. A true and accurate excerpt from that bank statement is reproduced below.

02/03	DEBIT CARD PURCHASE, AUT 020222 VISA DDA PUR SQ DINAH SKORICH 877 417 4551 * NY 4085404006587269	4,446.00
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62. DECA NY's September 2022 bank statement lists a withdrawal for another purchase at "SQ DINAH SKORICH DVM," this time on September 6, 2022, for \$4,403. A true and accurate excerpt from that bank statement is reproduced below.

09/06	DEBIT CARD PURCHASE, AUT 090222 VISA DDA PUR SQ DINAH SKORICH DVM GOSQ COM * NY 4085404006587269	4,403.00
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63. DECA NY's April 2022 bank statement lists a withdrawal for a purchase at "STATELINETACK COM" on April 11, 2022, for \$107.23. I have visited the website

<https://www.statelinetack.com/>, which advertises “the top choices in horsewear.” A true and accurate excerpt from that bank statement is reproduced below.

04/11	DEBIT CARD PURCHASE, AUT 040822 VISA DDA PUR STATELINETACK COM 888 8090751 * PA 4085404006587269	107.23
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**F. ATM Withdrawals**

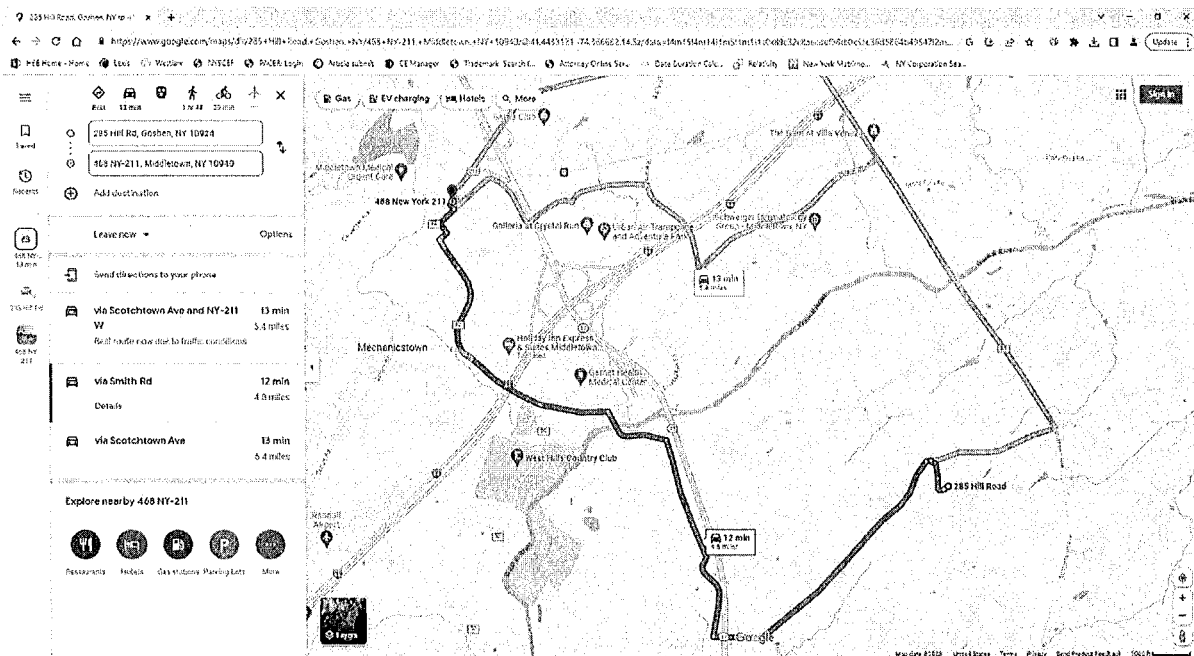
64. The Special Committee has compiled and reviewed ATM withdrawals from DECA NY’s bank accounts in the period between December 2015 and November 2022. The Special Committee has withdrawals totaling \$370,360.00. These amounts are reflected in the summary spreadsheet that is attached as Exhibit A.

65. Since December 2015, ATM withdrawals were made at such high a frequency and at times such that, to my knowledge and belief after reviewing DECA NY records and speaking with DECA NY Trustees, I have no reason to believe there was any legitimate DECA NY business purpose for these withdrawals.

66. Most of these ATM withdrawals occurred at the TD Bank Middletown branch, located at 468 Route 211 Middletown, NY, 10940 (the Middletown branch). Based on my review of a Google Maps page, the Middletown branch is located twelve minutes from the 285 Hill Road address of Mary Peres’s listed residence. A true and accurate copy of a Google Maps

page tracking the distance from 285 Hill Road, Goshen, New York to 468 Route 211

Middletown, New York, is reproduced below.



67. This affidavit includes copies of ATM withdrawals from bank records.

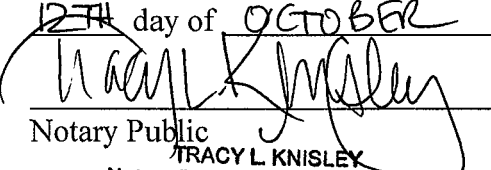
Specifically, DECA NY's September 2022 bank statement lists an ATM withdrawal on September 16, 2022, for \$1,000. A true and accurate excerpt from that bank statement is reproduced below.

09/16	TD ATM DEBIT, AUT 091622 DDA WITHDRAW 468 ROUTE 211 EAST MIDDLETOWN * NY 4085404006587269	1,000.00
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Dated: October 12, 2023

  
ALAN BALSDON

Sworn to before me this  
12TH day of OCTOBER, 2023

  
Notary Public  
TRACY L. KNISLEY  
Notary Public, State of New York  
Qualified in Niagara County  
ID# 01KN5070435  
Commission Expires December 16, 2024