

SUMMONS - CIVIL

JD-CV-1 Rev. 4-16

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259, P.B. §§ 3-1 through 3-21, 8-1, 10-13

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

See other side for instructions

- ☐ "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- ☒ "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- ☒ "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
1061 Main Street, Bridgeport, CT 06604		(203) 579-6527	July 23, 2019 Month Day Year
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	<input type="checkbox"/> G.A. Number: At Fairfield	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349)	Case type code (See list on page 2) Major: T Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)	Juns number (to be entered by attorney only)
Kenneth A. Votre, Esq., 90 Grove Street, Ste 290, Ridgefield, CT 06877	422508
Telephone number (with area code)	Signature of Plaintiff (if self-represented)
(203) 498-0065	

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.

☒ Yes ☐ No

Email address for delivery of papers under Section 10-13 (if agreed to)

votrelaw@gmail.com

Number of Plaintiffs: 2 Number of Defendants: 3 ☐ Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number, Street, P.O. Box, Town, State, Zip, Country, if not USA)	
First Plaintiff	Name: Peter Collins Address: 857 Post Road, #327, Fairfield, CT 06824	P-01
Additional Plaintiff	Name: Denise Collins Address: 857 Post Road, #327, Fairfield, CT 06824	P-02
First Defendant	Name: Alonso, Andalkar & Facher, P.C. Address: 920 Broadway, 16th Floor, New York, NY, 10010	D-01
Additional Defendant	Name: William C. Reddy Address: 1641 Third Avenue, APT. 3f, New York, NY 10128	D-02
Additional Defendant	Name: David Curran Address: 4610 Center BLVD., APT. 1803, Long Island City, NY 11109	D-03
Additional Defendant	Name: Address:	D-04

Notice to Each Defendant

- 1. YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Kenneth A. Votre	Date signed 6/13/2019
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If this Summons is signed by a Clerk:

- The signing has been done so that the Plaintiff(s) will not be denied access to the courts.
- It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law.
- The Clerk is not permitted to give any legal advice in connection with any lawsuit.
- The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.

For Court Use Only

File Date

I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date	Docket Number
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Print Form

(Page 1 of 2)

Reset Form

Instructions

1. Type or print legibly; sign summons.
2. Prepare or photocopy a summons for each defendant.
3. Attach the original summons to the original complaint, and attach a copy of the summons to each copy of the complaint. Also, if there are more than 2 plaintiffs or more than 4 defendants prepare form JD-CV-2 and attach it to the original and all copies of the complaint.
4. After service has been made by a proper officer, file original papers and officer's return with the clerk of court.
5. Do not use this form for the following actions:
 - (a) Family matters (for example divorce, child support, custody, paternity, and visitation matters)
 - (b) Summary Process actions
 - (c) Applications for change of name
 - (d) Probate appeals
 - (e) Administrative appeals
 - (f) Proceedings pertaining to arbitration
 - (g) Any actions or proceedings in which an attachment, garnishment or replevy is sought
 - (h) Entry and Detainer proceedings
 - (i) Housing Code Enforcement actions

ADA NOTICE

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

Case Type Codes

Major Description	Codes Major/Minor	Minor Description	Major Description	Codes Major/Minor	Minor Description
Contracts	C 00	Construction - All other	Property	P 00	Foreclosure
	C 10	Construction - State and Local		P 10	Partition
	C 20	Insurance Policy		P 20	Quiet Title/Discharge of Mortgage or Lien
	C 30	Specific Performance		P 30	Asset Forfeiture
	C 40	Collections		P 90	All other
	C 90	All other			
Eminent Domain	E 00	State Highway Condemnation	Torts (Other than Vehicular)	T 02	Defective Premises - Private - Snow or Ice
	E 10	Redevelopment Condemnation		T 03	Defective Premises - Private - Other
	E 20	Other State or Municipal Agencies		T 11	Defective Premises - Public - Snow or Ice
	E 30	Public Utilities & Gas Transmission Companies		T 12	Defective Premises - Public - Other
	E 90	All other		T 20	Products Liability - Other than Vehicular
Miscellaneous	M 00	Injunction		T 28	Malpractice - Medical
	M 10	Receivership		T 29	Malpractice - Legal
	M 20	Mandamus		T 30	Malpractice - All other
	M 30	Habeas Corpus (extradition, release from Penal Institution)		T 40	Assault and Battery
	M 40	Arbitration		T 50	Defamation
	M 50	Declaratory Judgment		T 61	Animals - Dog
	M 63	Bar Discipline		T 69	Animals - Other
	M 66	Department of Labor Unemployment Compensation Enforcement		T 70	False Arrest
	M 68	Bar Discipline - Inactive Status		T 71	Fire Damage
	M 70	Municipal Ordinance and Regulation Enforcement		T 90	All other
	M 80	Foreign Civil Judgments - C.G.S. 52-604 & C.G.S. 56a-30	Vehicular Torts	V 01	Motor Vehicles* - Driver and/or Passenger(s) vs. Driver(s)
	M 83	Small Claims Transfer to Regular Docket		V 04	Motor Vehicles* - Pedestrian vs. Driver
	M 84	Foreign Protective Order		V 05	Motor Vehicles* - Property Damage only
	M 90	All other		V 06	Motor Vehicle* - Products Liability Including Warranty
				V 09	Motor Vehicle* - All other
				V 10	Boats
				V 20	Airplanes
				V 30	Railroads
				V 40	Snowmobiles
				V 90	All other
Housing	H 10	Housing - Return of Security Deposit			*Motor Vehicles include cars, trucks, motorcycles, and motor scooters.
	H 12	Housing - Rent and/or Damages	Wills, Estates and Trusts	W 10	Construction of Wills and Trusts
	H 40	Housing - Audita Querela/Injunction		W 90	All other
	H 50	Housing - Administrative Appeal			
	H 60	Housing - Municipal Enforcement			
	H 90	Housing - All Other			

RETURN DATE: JULY 23, 2019

PETER COLLINS	:	SUPERIOR COURT
DENISE COLLINS	:	
INDIVIDUALLY AND ENJOINED	:	J. D. OF FAIRFEILD

V.	:	AT FAIRFIELD
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ALONSO, ANDALKAR & FACHER, P.C.,	:	
MARK J. ALONSO, WILLIAM REDDY,	:	
AND DAVID CURRAN	:	
INDIVIDUALLY	:	JUNE 13, 2019

THE PARTIES

1. The Plaintiff, Peter Collins (hereinafter "Plaintiff" or "Collins"), is an individual and a resident and citizen of the State of Connecticut.
2. The Plaintiff, Denise Collins (hereinafter "Plaintiff's Wife), and hereafter collectively with Peter Collins "Plaintiff(s)"), is an individual and a resident and citizen of the State of Connecticut.
3. The Defendant, Mark J. Alonso (hereinafter "Alonso"), is an individual and upon information and belief a resident and citizen of the State of New York. Alonso is an Attorney at Law licensed to practice before the Courts of the State of New York.
4. The Defendant Alonso, Andalkar & Facher, P.C. (herein after Alonso P.C.) a New York professional corporation engaged in the practice of Law in the State of New York, with a place of business in New York City.
5. The Defendant William Reddy (herein after "Reddy") is an individual and a resident and citizen of the State of New York and Florida.
6. The Defendant David Curran (herein after "Curran) is an individual and a resident and citizen of the State of New York.

7. The Defendants conspired to engage in tortious conduct designed to cause damage and harm within the State of Connecticut.
8. Jurisdiction is proper in Connecticut pursuant Connecticut General Statutes §52-59b and §33-929.

BACKGROUND

9. Plaintiff Collins along with three (3) other individuals, including Defendants Reddy and Curran (herein after the “Defendant Shareholders”) are and were at all times relevant herein the four (4) equal shareholders of a New York corporation known as 400 West 14th, Inc. (hereinafter the “Company”).
10. The Company, a New York S-Corporation organized in 1996, has since being formed, had the same four (4) equal shareholders: Defendant William Reddy, Matthew Reines (hereinafter “Reines”); Defendant David Curran, and Plaintiff Peter Collins.
11. At all times relevant herein, the Company operated “Gaslight,” a successful bar and pizzeria on West 14th Street, New York City.
12. The Company permanently closed for business on February 28, 2017. An auction was held to sell the material assets of the Company. Upon belief, the remaining properties are kept in a storage unit located in Pennsylvania, in a storage unit located in New York, in storage at the offices of Alonso PC, and in the state of Florida at Reddy’s private residence. A PO Box set up by Reddy in NYC, is for all intent and purpose, inactive. There is no operating space for the Company.
13. Reddy, as President, refuses to dissolve the Company, in part to fund and perpetuate tortuous conduct against Plaintiff(s) and to evade personal legal and tax obligations.
14. Plaintiff Peter Collins is a 25% shareholder of the Company and his shares are personal property present within the State of Connecticut (the “shares”).

15. The conduct of Defendants herein was and continues to be fueled by a years long vendetta directed towards the devolution and conversion of Plaintiff's shares and rights in said shares located in Connecticut.
16. The conduct of Defendants herein was and continues to be fueled by a years long vendetta directed against Plaintiff(s) in order to cause emotional harm, financial harm, harm to their marriage, and harm to their only child, a minor. This conduct extends toward the intentional disgorgement and depletion of Plaintiff(s)' assets located in Connecticut.
17. The conduct of the Defendants herein was and continues to be maliciously directed towards ensnaring Plaintiff(s) into paying tax and legal liabilities that Defendant Shareholders are the responsible parties for payment of such liabilities.
18. The conduct of the Defendants herein was and continues to be maliciously directed towards ensnaring Plaintiff(s) to pay for ongoing and unnecessary fees to Alonso P.C.
19. At the end of the year 2012, Plaintiff(s) and Reines began to suspect misfeasance by Reddy and Curran. In particular, at the counsel of Alonso, Defendant Shareholders began taking action harmful to the Company and to the ownership interest of Plaintiff in seeking to terminate his shares and shareholder rights. The actions were intentionally designed to retaliate against and to intimidate the Plaintiff(s), to confiscate or devalue Plaintiff shares and to deprive Plaintiff(s) of existing and future financial assets.
20. Reddy and Curran were assisted, advised and directed in private by Alonso and Alonso PC to seek tax attorneys and to obstruct Plaintiff(s) access to the financial records of the Company.
21. Alonso did not give or offer individual legal advice or assistance to Plaintiff nor did Alonso reveal that he counseled Reddy and Curran.
22. The legal advice given to Reddy and Curran was done in secret and was conspired to put Plaintiff in jeopardy of criminal tax evasion.

23. Reddy and Curran were also assisted, advised, and directed by Alonso and Alonso P.C. to terminate Plaintiff Wife, recently employed as bookkeeper, in order to intimidate Plaintiff(s) and to lock them out of the premises.
24. Defendant Shareholders conspired to intimidate and defame Plaintiff Wife by bringing three bouncers and two police officers to needlessly remove her from the premise in front of Plaintiff(s) 8-year-old son.
25. Defendants conspired to orchestrate a Company deadlock followed by a demand for Arbitration in order to seize unlawful control of the Company and to intentionally harm Plaintiff.
26. Days later on March 4, 2013, Plaintiff and Reines brought a civil action individually and derivatively on behalf of the Company against Reddy and Curran in the New York Supreme Court. The complaint claimed that Reddy, and to a lesser degree Curran, misappropriated 5 million dollars of the Company's money from 2006-2012. Plaintiff and Reines also called for the termination of Alonso PC as corporate counsel.
27. Alonso PC conspired with Defendant Shareholders to act as intervener for the Company in order to take positions contrary to Plaintiff and to protect the best interest of Defendant Shareholders.
28. Defendants conduct was clearly improper because of recognized conflict and because Alonso was aware of the misfeasance. This conduct was taken to protect Defendant Shareholders from civil and criminal prosecution and to obstruct Plaintiff's rights without cause.
29. On or about March 12, 2013, without Plaintiff's knowledge, Reddy and Curran, secretly requested entry into the Domestic Voluntary Disclosure Program of the Internal Revenue Service, related to disclosing 8.3 million dollars of previously unreported cash revenues and payroll fraud.

30. Without notice to the Supreme Court or to Plaintiff, and with Alonso's knowledge, Reddy and Curran personally engaged a premiere tax attorney to prepare and file amended corporate tax returns, K-1s, payroll tax returns, NYS tax returns, NYC tax returns and their own personal amended tax returns for 2006 and 2012.
31. It was not until 7 months later and upon submission to the IRS that Plaintiff learned about the amended tax returns.
32. The filings, made by Reddy and Curran under Voluntary Disclosure, were intentionally designed to ensnare Plaintiff into paying taxes on money he never received, into paying a portion of Reddy and Curran's personal tax liability and to implicate Plaintiff in Defendant Shareholders' massive scheme to defraud the government.
33. On or about May 13, 2013 that civil complaint was ordered by the New York Supreme Court to be heard before the American Arbitration Association (the "Arbitration").
34. Alonso PC continued to represent the Company at the sole direction of Reddy. In October 2013, Alonso PC was disqualified from representing the Company in the Arbitration because of conflict of interest.
35. Alonso and Alonso PC continued to represent the Company in matters unrelated to the Arbitration and apparently continued to counsel Reddy and Curran throughout the Arbitration, despite the clear conflict of interest and a court ordered disqualification.
36. The Arbitration hearings commenced March 10, 2014 and concluded on July 8, 2014 after eleven (11) days of hearings.
37. Alonso appeared as a witness on behalf of Defendant Shareholders and was recognized as an adversary by the Arbitration Chair.
38. On December 11, 2014 a Partial Final Award was issued in which Reddy was given run of the day-to-day, ordinary business of the Company. Alonso PC immediately became directly involved in all shareholder matters.

39. At all times since the onset of the 2012 dispute, Defendants individually and collectively conspired to engage in a malicious pattern of conduct in order to ruin Plaintiff(s) emotionally and financially. The conduct includes but is not limited to continuous vexatious litigation against Plaintiff(s), concealing Company funds, obtaining a judgment against Plaintiff with unclean hands, denying shareholder and director rights to Plaintiff, depriving Plaintiff from assets of the Company and money owed to him, demanding Plaintiff to put money into the Company to pay for liabilities that are properly the obligation of Curran and Reddy, protecting the individual interests of Defendants, causing the forfeit of Plaintiff shares in the company and then retaining shares in order to disgorge Plaintiff(s) of personal assets. These actions were further done to obstruct Plaintiff(s) from exposing Defendants' ongoing misfeasance.
40. At all times relevant herein Alonso P.C. represented Curran and Reddy in positions directly adverse to Plaintiff(s) and know or reasonably should have known that the goal of Defendant Shareholders was not to benefit the Company, but specifically to harm the Plaintiff(s) and to promote Defendant Shareholders' own interests and those interests of Alonso and Alonso PC.
41. Defendants continue a course of conduct attacking Plaintiff(s) with malicious intent and for personal gain with specific intent to shift Defendant Shareholders' financial liabilities to Plaintiff(s), to deprive the Plaintiff of his shares and assets, to refuse money owed to Plaintiff and to disgorge Plaintiff(s) of personal assets existing within the State of Connecticut.
42. Alonso PC's dual representation of the Company and Defendant Shareholders constitute a conflict of interest harmful to Plaintiff. This conduct and all actions against Plaintiff constitute a conflict that remains today.
43. Alonso and Alonso PC are irreparably aggrieved and have waged a years-long torturous and personal attack against the Plaintiff(s) in retaliation for seeking Alonso PC's

termination as Company counsel, for the disqualification of their representation during the arbitration, for lost legal fees resulting from the disqualification, for Plaintiff submission of a complaint to the Department of Disciplinary Committee and because Alonso PC is loyal to Alonso's personal relationship with Reddy.

44. Plaintiffs are irreparably aggrieved as the Defendants' actions continue to this very day. Years long torturous and personal attack against the Plaintiff(s) in retaliation for certain tax liabilities, personal legal fees and public exposure resulting from Plaintiff and Reines' 2013 complaint alleging the misappropriation \$5 million dollars. Defendants are further angered by the installment of cameras and a POS system on premise that made it harder for them to misappropriate Company funds.
45. Reddy is further retaliating for his exposure and embarrassment of having to share 7 years of personal credit card statements during the Arbitration and by the tightened noose resulting from his entry into the Voluntary Disclosure Program of the IRS.
46. Defendant Shareholders have, to this day, waged personal war against Plaintiff(s) because of said exposure in order to harm Plaintiff(s) and to protect themselves from Plaintiff access to Company books and records needed for a forensic accounting that would find continued and deliberate misfeasance including but not limited to payroll, sales tax and income tax fraud to the IRS.

FIRST COUNT – CIVIL CONSPIRACY AS TO ALL DEFENDANTS

47. Damage to Plaintiff was proximately caused by all the Defendants' conspiring to harass, frustrate and personally retaliate against Plaintiff(s). Ongoing, these actions are taken to cause irreparable financial and emotional harm to Plaintiff(s), while protecting Defendants' malicious and unlawful agenda.
48. Defendants conspired to seize improper authority over the Company in order to shut Plaintiff from all shareholder and director's rights and to deprive Plaintiff(s) of assets

including distributions and Plaintiff's shares of the Company.

49. The Defendants conspired to conceal the prolonged breach of fiduciary and managerial duties by Defendant Shareholders that personally benefit Defendants and personally harm Plaintiff(s).
50. Defendants conspired to misappropriate Company funds for personal benefit and to emotionally and financially harm Plaintiff(s) in actions including but not limited to funneling Company funds to Alonso PC and; to Alonso PC Attorney Trust Account and; to pay for Defendant Shareholders' individual legal defense in two separate employee lawsuits and; to pay for unauthorized legal settlements and; to pay Defendant Shareholders' reimbursements and unsubstantiated commissions and; to withdraw cashier's checks and; to improperly bring vexatious lawsuits against Plaintiff(s) in order to purposely seize Plaintiff shares, to deny Plaintiff Company assets, to purposely disgorge Plaintiff(s) of personal assets and to emotionally harass Plaintiff(s).
51. Defendants conspired to conceal unreported cash revenue and more than \$300,000 in POS discounts and; to conceal auction receipts and; to conceal employee wage abuse and; to conceal aiding and abetting sexual harassment and hate crimes and; to conceal legal settlements paid by Company funds and; to conceal tax liabilities and; to conceal sales and expenses of the Company and; to conceal personal expenses paid by Company funds. These intentionally caused damage to the value of Plaintiff's shares and to Plaintiff's fair share of Company assets.
52. Defendants conspired to conceal Defendant Shareholders' personal tax and legal liabilities in order to intentionally harm Plaintiff by roping him into paying Defendant Shareholders' financial obligations.
53. Defendants conspired to obfuscate the Shareholders Agreement, By-Laws, Certificate of Incorporation, Arbitration Award, NY BCL and the Business Judgment Rule in order to give

illegal authority to Reddy in exercising total control over business decisions used to cause emotional and financial harm to Plaintiff(s).

54. Defendants conspired to improperly charge the assets of the Company, without any accounting or reporting to the shareholders, in order to directly harm Plaintiff's interest in the Company, to conduct an improper sale of Plaintiff's shares, and to serve the personal interests of Defendant Shareholders.
55. Defendants conspired to oust Plaintiff from the Company in part, to get an extended lease after February 2017 without Plaintiff knowledge, or his necessary signature to extend such lease. This was intended to deprive Plaintiff of potential assets after the end of the Company lease on February 28, 2017. After the extended lease fell through and Defendants knew that there was no hope to generate revenue, they conspired to keep the Plaintiff as a shareholder in order to improperly hold Plaintiff liable for Defendant Shareholders' ongoing legal and tax obligations.
56. Defendants conspired to personally cause emotional and financial harm to Plaintiff and to enhance the personal interests of Defendants through illegal procedures relating to the voting right of the shareholders. Defendants intentionally utilized duplicitous language, improper votes, and unclean hands to: impose a meritless monetary judgment against Plaintiff and; to improperly remove Plaintiff as Secretary of the Company and; to improperly sell Plaintiff's shares in Company and; to refuse Plaintiff access to books, records, online accounts, receipts and tax bills of the Company and; to impose improper Cash Calls and; to obstruct Plaintiff from exposing the illegal actions of Defendants.
57. Defendants conspired to harm Plaintiff by imposing improper restrictions on Plaintiff shareholder rights including but not limited to Plaintiff right to participate in Shareholder Meetings and Shareholder votes.

58. Defendants conspired to keep the Company open after its official close of business on 2/28/17 in order to intentionally cause financial and emotional harm to Plaintiff and to protect their financial self interests.
59. Defendants conspired to cause financial and emotional harm to Plaintiff by making repeated unlawful capital calls while improperly cutting off all pertinent information to Plaintiff about assets and liabilities of the Company.
60. Defendants conspired to cause financial and emotional harm to Plaintiff by filing repeated vexatious litigation against Plaintiff(s).
61. Defendants conspired to ignore a clear conflict of interest by entering a vexatious lawsuit against Plaintiff, and by misappropriating Company funds to pay Alonso PC to personally represent Defendant Shareholders against fellow shareholders. This misappropriation, as with all others related to lawsuits against Plaintiff(s), was meant to cause Plaintiff(s) personal emotional and financial harm and to further harm to Plaintiff's interest in the Company by using that interest to pay Alonso PC to litigate in cases against Plaintiff.
62. Defendants conspired to ignore a clear conflict of interest and improper engagement of Alonso PC having simultaneous representation of both the Company and Defendant Shareholders in at least two employee lawsuits against the Company and Reddy and Curran individually. Alonso PC could not be neutral in simultaneous representation of the Company defendant and of Reddy and Curran, individual defendants. The best interests of individual defendants Reddy and Curran is averse to best interest of the defunct Company and, therefore Alonso PC representation is adverse to Plaintiff. This causes intentional emotional and financial harm to Plaintiff by further devaluing Plaintiff shares and by seeking improper Capital Calls to pay for legal defense that benefits Defendants.
63. Defendants conspired to conceal and obstruct Plaintiff from all Company interests, court filings, discovery production, summons served, and representation in employee lawsuits

against the Company and Reddy and Curran individually. This caused intentional harm to Plaintiff who was known to have important discovery that would benefit the Company's defense, and thereby Plaintiff's interest in such.

64. Defendants conspired to oust Plaintiff from the Company in part, to get an extended lease after February 2017 without Plaintiff knowledge, or his necessary signature to extend such lease. Defendants' malicious actions included an improper accounting of the Company assets and sale of Plaintiff's shares. This was intended to deprive Plaintiff of potential assets after the end of the Company lease on February 28, 2017.
65. Defendants conspired to lock Plaintiff from close of business matters including but not limited to the opportunity to pay homage to more than 20 years in business, to obtain Plaintiff's personal items, to do an accounting of assets prior to closing and to participate in the closing parties and auction sale of the Company's property.
66. Defendants conspired to ensnare Plaintiff as responsible taxpayer, owing nearly one million dollars, even though the law is clear that Plaintiff is not a responsible taxpayer for the Company.
67. Defendants conspired to have Alonso testify in the Arbitration in order to continue the conspiracy and to protect the personal interests of Defendant Shareholders and Alonso PC that includes but is not limited to refusing to enter court ordered discovery such as Alonso PC billing records and protecting Alonso PCs financial interest in Company litigation.
68. Defendants conspired to keep secret from Plaintiff and the Supreme Court that Alonso gave individual counsel to Defendant Shareholders to seek a tax attorney and that Defendant Shareholders requested entry into the Domestic Voluntary Disclosure Program of the IRS. This secret resulted in 7 years of amended tax returns and millions of dollars in tax liability in a conspiracy to entrap Plaintiff in a criminal tax fraud and to shift Defendant Shareholders'

tax liability to Plaintiff(s). A forensic examination eventually found that the amended tax returns showed a 7-year pattern consistent with fraud.

69. Defendants conspired to ignore and to refuse payment of more than \$222,612 owed to Plaintiff as a result of the amended tax returns submitted to the IRS by Defendant Shareholders.
70. At all times Alonso PC represented the Company and Defendant Shareholders in the obstruction of Plaintiff's rights and in the legal actions against Plaintiff(s); all were taken with malicious intent to harm Plaintiff and were not in the best interest of the Company, which Alonso PC was ethically expected to protect.
71. Defendants engaged in prolonged harassment against Plaintiff(s) by repeatedly sending certified mail and legal summons to be received by the front desk of Plaintiff's known former addresses and by sending receivers on multiple occasions even after notification that Plaintiff(s) attorney would receive the summonses.
72. Defendants, through legal actions, used ad hominin and defamatory attacks to prejudice the courts against Plaintiff(s) and to unfairly position the Company against Plaintiff(s).
73. Defendants claimed, in at least one litigation, that the actions of Plaintiff in relation to the Company constituted "immoral, oppressive [and] unscrupulous" trade practices, for which they were allegedly entitled to recover damages, including punitive damages and attorney's fees, notwithstanding the fact that the allegations were false and defamatory, and that there was no realistic case for the allegations and prolonged vexatious litigation, owing that the litigations were later terminated by the court or by Defendants themselves.
74. In 2013, Defendant Shareholders, under the Company veil, filed for Temporary Restraining Order against Plaintiff and Reines. The Supreme Court dismissed the Temporary Restraining Order.

75. In 2013, Defendant Shareholders, under the Company veil, conspired to file a Contempt of Court action against Plaintiff. The complaint was disposed.
76. In 2015 and 2016, Defendant Shareholders conspired to seek a vexatious judgment against Plaintiff that involved the unclean hands of Alonso and Alonso PC. Defendants used the judgment to further unjustly vex Plaintiff(s) despite knowing of and refusing payment of distributions owed to Plaintiff in excess of the unclean judgment.
77. In 2016, Defendant Shareholders conspired to file a verified petition to turnover Plaintiff shares to the Company giving themselves majority ownership. The complaint against Plaintiff was held by injunction and then dismissed after 10 months of tortuous and defamatory actions by Defendants.
78. In 2016, Defendant Shareholders, under the Company veil, conspired to file a meritless complaint for Fraudulent Conveyance against Plaintiff wife. This case was undertaken despite clear evidence that there was no fraudulent conveyance, and despite the fact that Plaintiff had a defensible debt owed to him by the Company in excess of the unclean judgment against him. This case was a fishing expedition intentionally and maliciously meant to expose years of Plaintiff(s) personal financial information unrelated to the complaint. The complaint against Plaintiff Wife was dismissed after two years of tortuous and defamatory actions by Defendants.
79. In 2017, Defendants conspired to withhold knowledge of an employee action the Company and the shareholders and receipt of summons for Plaintiff. After Plaintiff was voluntarily dismissed from the employee complaint, Defendants conspired to file a Third-Party complaint against Plaintiff in order to wickedly ensnare Plaintiff in Defendant Shareholders' personal liability for a class action wage abuse lawsuit against the Company and Defendant Shareholders, individually. The complaint was dismissed.
80. In 2017, Defendant Shareholders, under the Company veil, conspired to file Summary

Judgment In Lieu of Complaint against Plaintiff for judgment on \$26,000 in improper Capital Calls. In subsequent papers, Defendant Shareholders called for Plaintiff to post an undertaking of \$472,612 against the \$26,000 in order to further Defendants' conspiracy to harm Plaintiff(s) and to cripple Plaintiff by divesting personal assets. The Summary Judgment against Plaintiff was denied after 11 months of tortuous and defamatory actions by Defendants.

81. Contrary to Defendants' allegations in the litigations, Defendants were well aware that there had been valid defenses, and that Defendants had no claims against or defenses against Plaintiff(s).
82. As a result of Defendants' vexatious litigation and defenses as aforesaid, Plaintiff(s) herein sustained prolonged, substantial losses and expenses in defending against the litigation, damages to reputation, lost time, lost income, lost earning potential, enormous emotional distress and debilitating mental anguish.
83. In commencing and continuing to prosecute said litigation, Defendants acted without probable cause. Further, Defendants acted with malice to vex and trouble Plaintiff(s). The termination of the litigation as aforesaid constituted a termination in Plaintiff's favor. As a result of Defendants' wrongful commencement and continued prosecution of the litigation, Plaintiff(s) have suffered damages as set forth below.

**SECOND COUNT: COMMON LAW VEXATIOUS LITIGATION AS TO WILLIAM
REDDY AND DAVID CURRAN**

84. 1-87 Paragraphs 1-87 of the First Cause on hereby incorporated as Paragraphs 1-87 of this the Second Count.
85. As set forth above, since 2013, Defendant Shareholders, under Company veil, commenced and continue to prosecute litigation against Plaintiff, despite the lack of a

reasonable basis to do so.

86. In commencing and continuing to prosecute said litigation, Defendant Shareholders acted without probable cause. Further, Defendants acted with malice to vex and trouble Plaintiff(s).

87. Defendant Shareholders acted without authority to engage the Company in litigation against Plaintiff(s).

88. Defendant Shareholders wrongful commencement and continued prosecution of litigation, Plaintiff(s) have suffered damages as set forth above and is entitled to recover under New York's common law cause of action for vexatious litigation.

THIRD COUNT: AIDING AND ABETTING VEXATIOUS LITIGATION -
AS TO DEFENDANTS MARK J. ALONSO AND ALONSO, ANDALKAR &
FACHER P.C.

1-82 Paragraphs 1-82 of the First Cause on hereby incorporated as Paragraphs 1-82 of this the Third Count.

89. Defendant Alonso and Alonso PC violated their obligation to deny employment DR 2-109 [1200.14] on behalf of a person if the lawyer knows or it is obvious that such person wishes to: 1) Bring a legal action, conduct a defense, or assert a position in litigation, or otherwise have steps taken for such person merely for the purpose of harassing or maliciously injuring any person

90. As set forth above, Defendant Shareholders wrongfully commenced and prosecuted, on behalf of the Company and themselves individually, the aforesaid litigation against Plaintiff(s) in violation of the New York statutory and common law proscriptions against vexatious litigation.

91. Defendants Alonso and Alonso PC knowingly and substantially assisted Defendant

Shareholders wrongful actions of commencing and prosecuting litigation, in that they helped plan, prepare, file and continue to prosecute said litigation.

92. At the time that they provided said substantial assistance, Defendants Alonso and Alonso PC were generally aware of their role in the wrongful commencement and prosecution of said litigation.
93. As a result of Defendants Alonso and Alonso PC knowing and substantial assistance in the improper commencement and continued prosecution of litigation, Plaintiffs have suffered damages as set forth above, and Plaintiffs are entitled to recover damages against Defendants, including double or treble damages and/or compensatory damages under the common law, including all legal fees related to this complaint.

WHEREFORE, Plaintiff prays for relief as follows:

1. Money damages for direct and consequential damages;
2. Treble or double damages;
3. Interest;
4. Costs;
5. Such other and further relief as the Court deems just and proper.

Dated at Ridgefield, Connecticut, this 13th day of June 2019.

Respectfully Submitted,
THE PLAINTIFFS,
PETER COLLINS and
DENISE COLLINS

By: 

Kenneth A. Votre
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Fax (203) 438-4202
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Juris Number: 422508

RETURN DATE: JULY 23, 2019

PETER COLLINS	:	SUPERIOR COURT
DENISE COLLINS	:	
INDIVIDUALLY AND ENJOINED	:	J. D. OF FAIRFEILD

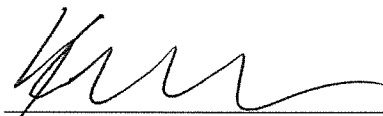
V.	:	AT FAIRFIELD
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MARK J. ALONSO, CATANIA FACHER, MANOJ	:	
ANDALKAR, CARI LEWIS, ROBERT MAGRANE,	:	
AND ALONSO, ANDALKAR & FACHER, P.C.,	:	
AND WILLIAM REDDY, AND DAVID CURRAN	:	
INDIVIDUALLY	:	JUNE 13, 2019

STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest, or property in demand is \$15,000.00 or more, exclusive of interest and costs.

Respectfully Submitted,
THE PLAINTIFFS,
PETER COLLINS and
DENISE COLLINS

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