

DOCKET NO.: HHD-CV-14-6048286-S

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: MARCH 5, 2014

**AFFIDAVIT OF CHERYL A. TURNER**

STATE OF CONNECTICUT:

:

ss. HARTFORD

COUNTY OF HARTFORD :

I, Cheryl A. Turner, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am employed as a Paralegal Specialist II in the Connecticut Attorney General's Office, assisting with the investigation and enforcement of cases concerning public charities.
3. I have been assisting with the investigation of the corporate practices of the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. I have also been assisting in the investigation and review of information regarding past scholarship recipients. This included assisting in locating, interviewing, and preparing affidavits for nine (9) Doc Hurley Scholarship award recipients.
5. Recipients informed me that the Foundation awarded two types of scholarships. Book Scholarships which were worth a total of \$2,000.00 and Legacy Scholarships which were

worth a total of \$10,000.00. Book Scholarship award recipients were to receive \$500.00 per year throughout their 4 years of college and Legacy Scholarship award recipients were to receive \$2,500.00 per year throughout their 4 years of college.

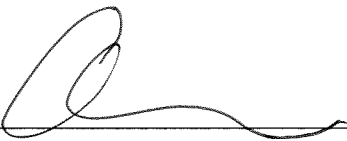
6. The following is a summary of the information contained in the attached nine (9) affidavits of scholarship recipients.

<u>RECIPIENT</u>	<u>TYPE</u>	<u>AMOUNT AWARDED</u>	<u>AMOUNT RECEIVED/DATES</u>	<u>TOTAL UNPAID</u>	<u>EXHIBIT</u>
Burgos-Lopez, Luz	Legacy	\$10,000	\$2,500 (2005-2006)	\$7,500	A
Cavaliere, Brittany	Book	\$2,000	\$500 (2006-2007)	\$1,500	B
Thomas, Jermaine	Legacy	\$10,000	\$5,000 (2006-2007) & (2007-2008)	\$5,000	C
Trothier, Amanda	Book	\$2,000	\$1,000 (could not recall dates but attended college from Fall of 2006 to May of 2010)	\$1,000	D
Li, Wenjie (Jolina)	Book	\$2,000	\$0	\$2,000	E
Banks, Tiffany	Legacy	\$10,000	\$5,000 (2008-2009) & (2009-2010)	\$5,000	F
Bhattarai, Utsarga	Book	\$2,000	\$0	\$2,000	G
Cusano, Alyssa	Book	\$2,000	\$500 (2008-2009)	\$1,500	H
Doko, Donias	Book	\$2,000	\$500 (2008-2009)	\$1,500	I
TOTAL AMOUNTS:		\$42,000 AWARDED	\$15,000 RECEIVED	\$27,000 UNPAID	

7. The Office of the Attorney General believes that this list of unpaid scholarship recipients is not complete.

  
Cheryl A. Turner, Paralegal Specialist II  
Office of the Attorney General

Subscribed and sworn to before me this 5<sup>th</sup> day of March, 2014.

  
Caitlin Calder  
Assistant Attorney General

# **EXHIBIT A**

RETURN DATE:

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: JANUARY 17, 2014

**AFFIDAVIT OF LUZ BURGOS-LOPEZ**

STATE OF NEW YORK :

ss. Poughkeepsie

COUNTY OF DUTCHESS :

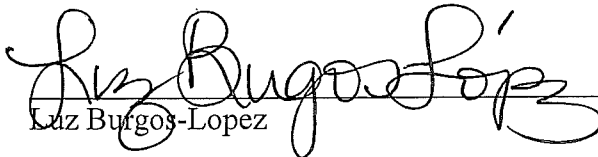
I, Luz Burgos-Lopez, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2005 graduate of Bulkeley High School in Hartford, Connecticut.
3. During my senior year of high school, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation") and was awarded a \$10,000.00 Legacy Scholarship (the "Scholarship"). Pursuant to the Scholarship award, my school was to be paid \$2,500.00 a year on my behalf over the four years that I attended college.
4. I attended Wesleyan University after high school and graduated in 2009.
5. At some time during my freshman year, 2005 – 2006, Wesleyan University was paid \$2,500.00 from the Foundation.

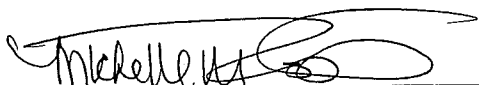
6. Towards the end of my freshman year, 2006, I received a letter from the Foundation requesting that I complete an application in order to renew my scholarship. I completed the application renewal and provided them with the additional information that was requested.

7. On multiple occasions, throughout my sophomore year, 2006-2007, I contacted the Foundation through telephone calls and e-mails. I received one email response which stated that the Foundation was in the process of renewing my scholarship. I did not receive any further communication from the Foundation.

8. To the best of my knowledge, Wesleyan University did not receive any additional payments for my benefit from the Foundation.

  
Luz Burgos-Lopez

Subscribed and sworn to before me this 17 the day of January, 2014.

  
Notary Public  
My Commission Expires:  
Commissioner of Superior Court

MICHELLE M. RANSOM  
NOTARY PUBLIC, State of New York  
No. 01RA5022351  
Qualified in Dutchess County  
Commission Expires January 10, 2017

# **EXHIBIT B**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: FEBRUARY 11, 2014

**AFFIDAVIT OF BRITTNEY CAVALIERE**

DISTRICT OF COLUMBIA :  
: SS.  
CITY OF WASHINGTON :

I, BRITTNEY CAVALIERE, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2006 graduate of East Hartford High School in East Hartford, Connecticut.
3. During my senior year of high school, 2005-2006, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Towards the end of my senior year of high school I received notification from the Foundation that I had been awarded a \$2,000.00 Doc Hurley Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college.
5. I attended Fordham University after high school and graduated in May of 2010.



6. During the fall of my freshman year, 2006-2007, after I made a number of telephone and email inquiries, Fordham University received a payment of \$500.00, on my behalf, from the Foundation.

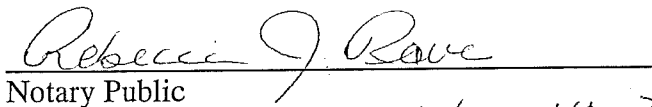
7. During my sophomore year I sent multiple e-mails and made multiple telephone calls to the Foundation and left messages.

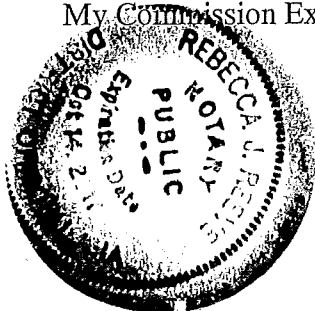
8. I received one or two responses from the Foundation indicating that my scholarship money was on its way.

9. To the best of my knowledge Fordham University never received any additional Doc Hurley Book Scholarship payments, after the initial \$500.00 for my freshman year, from the Foundation, on my behalf.

  
Brittney Cavaliere

Subscribed and sworn to before me this 12 th day of February, 2014.

  
Notary Public  
My Commission Expires: October 14, 2017



# EXHIBIT C

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

SUPERIOR COURT

JUDICIAL DISTRICT OF HARTFORD

FEBRUARY 5, 2014

**AFFIDAVIT OF JERMAINE THOMAS**

ILLINOIS  
STATE OF ~~CONNECTICUT~~  
COUNTY OF COOK

ss.

Chicago

I, JERMAINE THOMAS, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2006 graduate of Hillhouse High School in New Haven, Connecticut.
3. During my senior year of high school, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation") and was awarded a \$10,000.00 Legacy Scholarship (the "Scholarship"). Pursuant to the Scholarship award, my school was to be paid \$2,500.00 a year on my behalf over the four years that I attended college.
5. After high school, I attended Georgetown University and graduated in 2010.
6. At some time during my freshman year, 2006 – 2007, Georgetown University was paid \$2,500.00 from the Foundation.
7. At some time during my sophomore year, 2007 – 2008 Georgetown University was paid \$2,500.00 from the Foundation.

7. On multiple occasions, throughout my junior year, 2008-2009, I contacted the Foundation through telephone calls and e-mails to verify that they had received my enrollment verification information and inquire as to when payment would be made for my junior year.

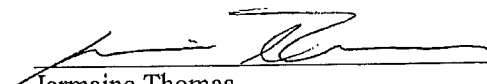
8. I received an email response on January 21, 2009 from Muriel Hurley-Carter indicating that my scholarship had been returned in the mail and that she needed the address for the Bursar's Office.

9. I received a second email on April 23, 2009 from Ms. Hurley-Carter indicating that she was sending the check that day via express mail and that it would arrive before I was charged late fees.

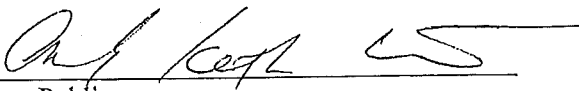
10. I did not receive any further communication from the Foundation.

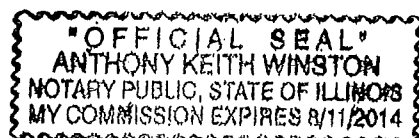
11. I checked with the University on multiple occasions but the legacy scholarship money never was paid for my junior or senior years.

11. To the best of my knowledge, Georgetown University did not receive any additional payments for my benefit from the Foundation.

  
Jermaine Thomas

Subscribed and sworn to before me this 7th day of February, 2014.

  
Notary Public  
My Commission Expires: 8-11-2014



# **EXHIBIT D**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: FEBRUARY 6, 2014

**AFFIDAVIT OF AMANDA TROTHIER**

STATE OF WASHINGTON :

COUNTY OF Pierce County :

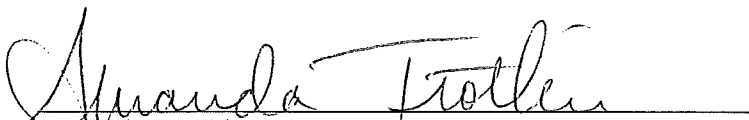
ss. \_\_\_\_\_

I, AMANDA TROTHIER, being duly sworn, depose and say:


1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2006 graduate of Bristol Central High School in Bristol, Connecticut.
3. During my senior year of high school, 2005-2006, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Towards the end of my senior year of high school I received notification from the Foundation that I had been awarded a \$2,000.00 Doc Hurley Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college.
5. I attended Eastern Connecticut State University after high school and graduated in May of 2010.

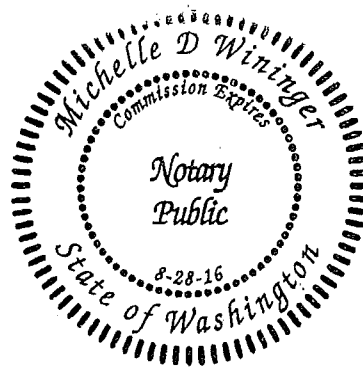
6. Over the course of my four years at Eastern Connecticut State University I had to make numerous telephone calls and send multiple e-mails to the Foundation in order to pursue the payment of the book Scholarship that I had been awarded.

7. To the best of my knowledge, Eastern Connecticut State University only received two payments of \$500.00 each, for my benefit, from the Foundation instead of the four payments of \$500.00 I was awarded by the Foundation in 2006.

  
Amanda Trothier

Subscribed and sworn to before me this 6 th day of February, 2014.

  
Notary Public Michelle D. Winger  
My Commission Expires: 8/28/16



# **EXHIBIT E**



GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
:  
: FEBRUARY 6, 2014

**AFFIDAVIT OF WENJIE LI**

STATE OF CONNECTICUT  
:  
:  
COUNTY OF HARTFORD :

ss. NEW BRITAIN

I, WENJIE LI, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2007 graduate of New Britain High School in New Britain, Connecticut.
3. During my senior year of high school, 2006-2007, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Towards the end of my senior year of high school I received notification from the Foundation that I had been awarded a \$2,000.00 Doc Hurley Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college.

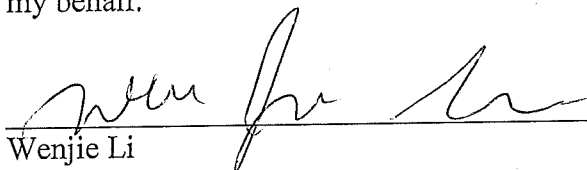
5. After high school I attended Widener University starting in the fall of 2007 to December 2008. I then transferred to the University of Connecticut and graduated from there in May of 2012.

6. To the best of my knowledge Widener University never received \$500.00 on my behalf to fulfill the first year or second year of my scholarship award.

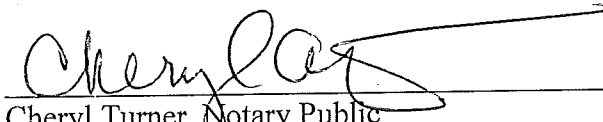
7. To the best of my knowledge the University of Connecticut never received any payments on my behalf from the Foundation to fulfill my book scholarship award.

8. On several occasions, I made multiple telephone calls to the Foundation and spoke with Muriel Hurley who assured me each time the money was forthcoming.

9. To the best of my knowledge neither Widener University nor the University of Connecticut ever received any Doc Hurley Book Scholarship payments from the Foundation, on my behalf.

  
Wenjie Li

Subscribed and sworn to before me this 6 th day of February, 2014.

  
Cheryl Turner, Notary Public  
My Commission Expires: November 30, 2014

# **EXHIBIT F**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: FEBRUARY 6, 2014

**AFFIDAVIT OF TIFFANY C. BANKS**

STATE OF CONNECTICUT

:

ss. HARTFORD

COUNTY OF HARTFORD

:

I, Tiffany C. Banks, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2008 graduate of Bloomfield High School in Bloomfield, Connecticut.
3. During my senior year of high school, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation") and was awarded a \$10,000.00 Legacy Scholarship (the "Scholarship"). Pursuant to the Scholarship award, my school was to be paid \$2,500.00 a year over the four years that I attended college.
4. I attended the University of Connecticut after high school and graduated in the fall of 2012.
5. At some time during my freshman year, 2008 - 2009, the University of Connecticut was paid \$2,500.00 from the Foundation on my behalf.

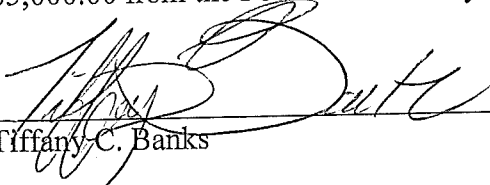
6. At some time during my sophomore year, 2009 - 2010, the University of Connecticut was paid \$2,500.00 from the Foundation on my behalf.

7. Prior to the University actually receiving payment my sophomore year, I had to continually call the Foundation to inquire about the payment. It was finally received by the university but later than expected.

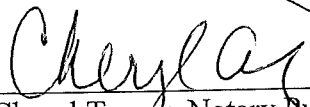
8. Prior to my junior year, 2010 - 2011, I was contacted by the Foundation to provide additional information as was required by the Scholarship award. I provided the information that was requested. After timely submitting the information, I had to again continually call and e-mail the Foundation, but to the best of my knowledge, no payment was ever received by the University, on my behalf, for my junior year.

9. During my senior year, I once again attempted to contact the Foundation about my scholarship award, and once again, to the best of my knowledge no payment was received by the University, on my behalf, for my senior year.

10. To the best of my knowledge the University of Connecticut only received \$5,000.00 from the Foundation for my benefit.

  
\_\_\_\_\_  
Tiffany C. Banks

Subscribed and sworn to before me this 6th day of February, 2014.

  
\_\_\_\_\_  
Cheryl Turner, Notary Public  
My Commission Expires: 11/30/2014  
Commissioner of Superior Court

# **EXHIBIT G**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

SUPERIOR COURT

JUDICIAL DISTRICT OF HARTFORD

JANUARY 17, 2014

**AFFIDAVIT OF UTSARGA BHATTARAI**

STATE OF COLORADO :  
COUNTY OF Summit :

ss. 

I, Utsarga Bhattarai, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath. ✓
2. I am a 2008 graduate of Hall High School in West Hartford, Connecticut. ✓
3. During my senior year of high school, 2007-2008, I applied to the Doc Hurley ✓


Scholarship Foundation, Inc. (the "Foundation").

4. At the end of my senior year of high school I received an award letter from the Foundation, dated June 19, 2008, and signed by Muriel Hurley-Carter, awarding me a \$2,000.00 Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college. ✓

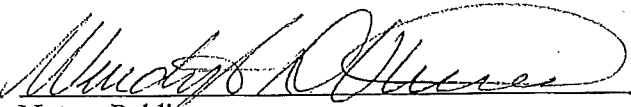
5. I attended Colorado College after high school and graduated in 2012.

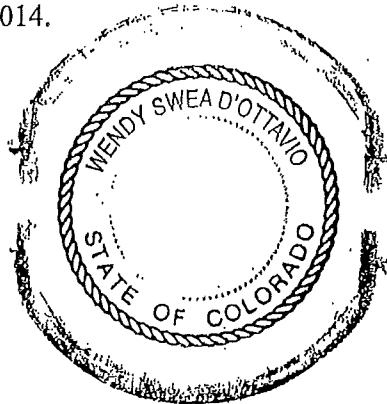
6. To the best of my knowledge Colorado College never received any Book Scholarship payments from the Foundation on my behalf. ✓

7. On multiple occasions, up and through my junior year of college, I contacted the Foundation through multiple telephone calls and e-mails, but never was contacted by the Foundation. ✓

  
Utsarga Bhattarai January 27, 2014

Subscribed and sworn to before me this 27th day of January, 2014.

  
Notary Public  
My Commission Expires: 7/13/2017  
Commissioner of Superior Court





# **EXHIBIT H**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: FEBRUARY 8, 2014

**AFFIDAVIT OF ALYSSA CUSANO**

STATE OF MASSACHUSETTS :

COUNTY OF Middlesex :

ss. 

I, ALYSSA CUSANO, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2008 graduate of Bristol Central High School in Bristol, Connecticut.
3. During my senior year of high school, 2007-2008, I researched multiple scholarships and applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Towards the end of my senior year of high school I received notification from the Foundation that I had been awarded a \$2,000.00 Doc Hurley Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college.
5. I attended Salve Regina University in Newport, Rhode Island after high school and graduated in May of 2012.

6. At the beginning of my freshman year, 2008-2009, Salve Regina University received a payment of \$500.00, on my behalf, from the Foundation.

7. At some point prior to my sophomore year, I provided the Foundation with additional information, as requested and required by the Foundation, for the continuation of the scholarship award.

8. I never received a response from the Foundation after submitting the additional information requested.

9. To the best of my knowledge Salve Regina never received the next \$500.00 payment for my sophomore year.

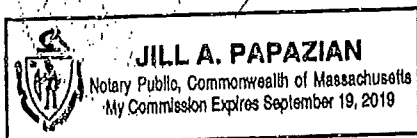
10. During my sophomore year I sent multiple e-mails and made multiple telephone calls to the Foundation and left messages, but never received e-mails back or any return telephone calls.

11. To the best of my knowledge Salve Regina University never received any additional Doc Hurley Book Scholarship payments, after the initial \$500.00 for my freshman year, from the Foundation, on my behalf.

Alyssa Cusano  
Alyssa Cusano

Subscribed and sworn to before me this 8 th day of February, 2014.

[Signature]  
Notary Public  
My Commission Expires: 9/19/19



# **EXHIBIT I**

GEORGE JEPSEN  
ATTORNEY GENERAL  
*Plaintiff*

v.

DOC HURLEY SCHOLARSHIP  
FOUNDATION, INC.  
*Defendant*

: SUPERIOR COURT  
:  
: JUDICIAL DISTRICT OF HARTFORD  
:  
:  
:  
:  
: JANUARY 17, 2014

**AFFIDAVIT OF DONIAS DOKO**

STATE OF NEW YORK :  
:  
COUNTY OF Monroe :

ss. \_\_\_\_\_

I, DONIAS DOKO, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am a 2008 graduate of Bulkeley High School in Hartford, Connecticut.
3. During my senior year of high school, 2007-2008, I applied to the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Towards the end of my senior year of high school I received notification from the Foundation that I had been awarded a \$2,000.00 Doc Hurley Book Scholarship. Pursuant to the Scholarship award, my school was to be paid \$500.00 a year on my behalf over the four years that I attended college.
5. I attended the University of Rochester after high school and graduated in May of 2013.

6. At the beginning of my freshman year, 2008-2009, the University of Rochester bookstore received payment of \$500.00, on my behalf, from the Foundation.

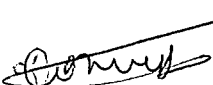
7. At the beginning of my sophomore year, 2009-2010, prior to purchasing my textbooks for the fall semester, I went to the University of Rochester bookstore to verify that the Foundation had sent the next \$500.00 payment on my behalf. No payment had been made.

8. I made multiple telephone calls to the Foundation and left messages, but never received any return telephone calls.


9. At the beginning of the spring semester of my sophomore year, 2010, I again went to the University of Rochester bookstore to check to see if the Foundation had submitted the next \$500.00 payment on my behalf. Again, no payment had been made.

10. I again made telephone calls to the Foundation and left messages, but never received any return telephone calls.

11. To the best of my knowledge the University of Rochester book store never received any additional Doc Hurley Book Scholarship payments, after the initial \$500.00 for my freshman year, from the Foundation, on my behalf.

  
\_\_\_\_\_  
Donias Doko

Subscribed and sworn to before me this 17 th day of January, 2014.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 02/07/2015

