STATE OF VERMONT PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts

PRB File Nos. 2019-102 and 2020-011

AFFIDAVIT OF ALYSSA M. BACHAND

I, Alyssa M. Bachand, am a paralegal at Gravel & Shea PC and declare the following

based upon my personal knowledge:

1. I assisted Navah C. Spero, Esq., Specially Assigned Disciplinary Counsel in the

above-captioned matter, in preparing supplemental discovery responses together with a

supplemental document production.

2. On June 1, 2023 at 4:18 p.m., I sent an e-mail to nwatts@wattslawvt.com and

cc'ed mreckard@wattslawvt.com and Attorney Spero. Exhibit 1. Attached to my e-mail was

Specially Assigned Disciplinary Counsel's Supplemental Response to Respondent's Requests for

Production of Documents. My e-mail stated that the accompanying document production,

bearing Bates nos. SDC000846-1197, could be downloaded via the included Sharefile link.

3. The e-mail addresses I used were the ones I had used to correspond with

Mr. Watts and Ms. Reckard previously and after that time.

The document production, bearing Bates nos. SDC000846-1197, included the

following:

4.

a. SDC000846-998: 26 e-mails with Gary Alibozek and/or Sharyn Alibozek;

b. SDC000999-1002: two e-mails with Judy Hiramoto;

c. SDC001003-1136: transcripts from the June 30, 2020 and July 2, 2020

interviews of Norman Watts;

d. SDC001137-1138: videos from the June 30, 2020 and July 2, 2020

interviews of Norman Watts, produced in native format; and

e. SDC001139-1197: 42 e-mails with Charlotte Dennett.

5. I did not receive a bounce back e-mail or any other indication that my June 1st

e-mail did not go through to all recipients.

6. On June 6, 2023, I was copied on an e-mail in which Attorney Spero transmitted

five (5) screenshots of text messages to Jon Alexander for the purposes of responding to the

Subpoena in *Alibozek v. Watts*. Exhibit 2. Four of the screenshots included text messages

between Attorney Spero and Gary Alibozek. One of the screenshots included a text message

from Attorney Spero to Charlotte Dennett.

7. On June 15, 2023, I transmitted to Jon Alexander three (3) additional screenshots

of text messages that occurred during the hearing for the purposes of responding to the Subpoena

in Alibozek v. Watts. Exhibit 3. The screenshots included text messages between Attorney Spero

and Gary Alibozek.

I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I will be subject to the penalty of perjury,

or other sanctions in the discretion of the court.

Dated: September 13, 2023

Alyssa M. Bachand

Gravel & Shea PC

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Burlington, VT 05402-0369

(802) 658-0220

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gravel & shea attorneys at law

A PROFESSIONAL CORPORATION
76 St. Paul Street
Post Office Box 369

From: Alyssa M. Bachand <abachand@gravelshea.com>

Sent: Thursday, June 1, 2023 4:18 PM

To: nwatts@wattslawvt.com

Cc: 'Margaux Reckard'; Navah C. Spero

Subject: PRB No. 2019-102 and 2020-011 - SDC Supplemental Response to Requests for

Production

Attachments: SDC Supplemental Responses to Requests to Produce.pdf

Please see the attached supplemental discovery responses. The accompanying document production, bearing Bates nos. SDC000846-1197, can be downloaded here: https://gravelshea.sharefile.com/d-sc81b309a042447b69387ab1cf0564747. Please let me know if you have any issues accessing the documents.



Alyssa M. Bachand (she/her) | Paralegal Gravel & Shea PC

76 St. Paul Street, 7th Floor | P.O. Box 369 | Burlington, VT 05401 T: 802-658-0220 | F: 802-658-1456 | Direct: 802-264-3248 abachand@gravelshea.com | www.gravelshea.com

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Hi Navah-

Thank you.

Gary Alibozek here. Not sure if this number is compatible to texting or not, however, I am wondering if the charging document against Attorney Watts is still on schedule? I definitely don't want to be a pest, but I have been brushed off, or otherwise deceived for 6 1/2 yrs, thus, I'm hoping to see a light at the end of this tunnel.

We will be sending that document in a few minutes.

9/19/21 2:02 PM

5/29/21 10:42 AM

Navah-

Is it fair to assume that Sharyn and I won't e testifying until November now? Also, wondering what has been transpiring with Watts case lately.

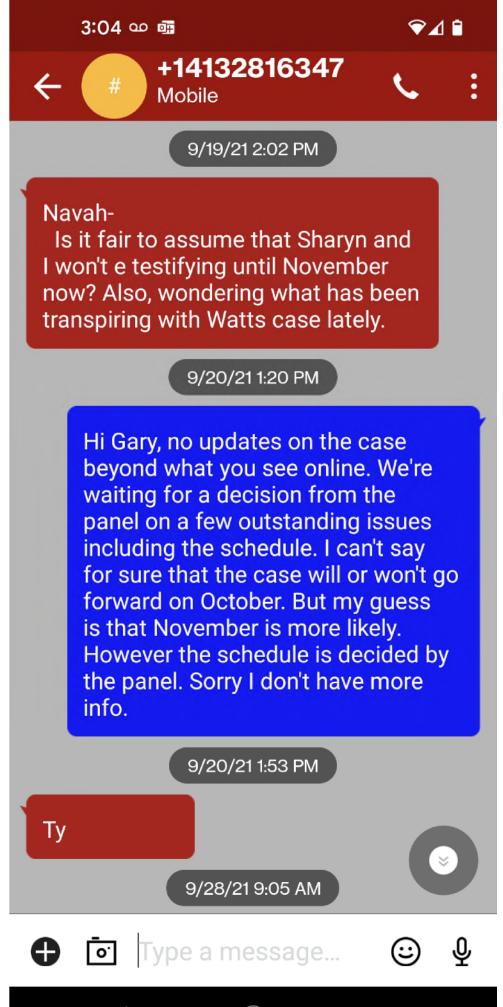




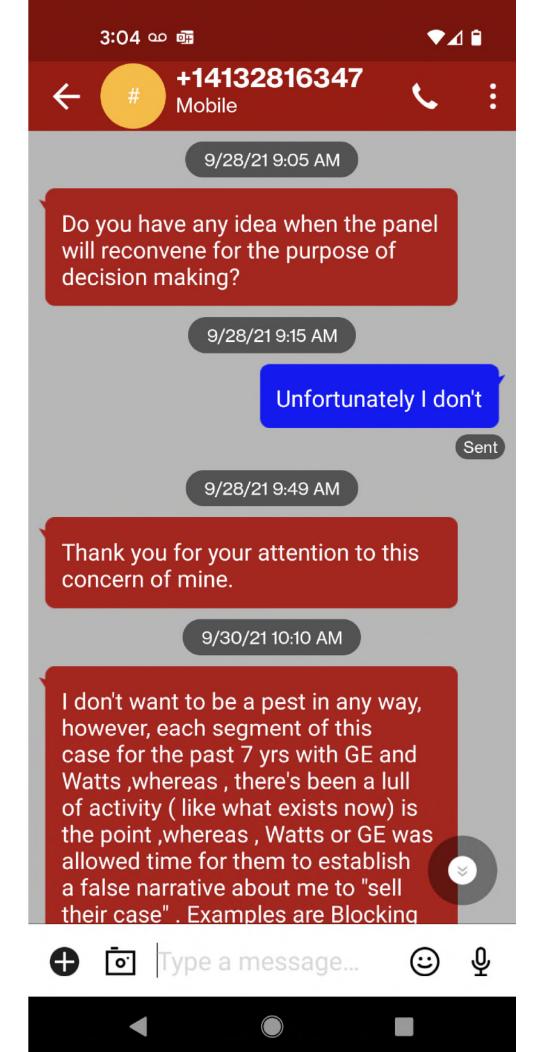
Type a message...















+14132816347 Mobile



♥⊿₿

Thank you for your attention to this concern of mine.

9/30/21 10:10 AM

I don't want to be a pest in any way, however, each segment of this case for the past 7 yrs with GE and Watts ,whereas , there's been a lull of activity (like what exists now) is the point ,whereas , Watts or GE was allowed time for them to establish a false narrative about me to "sell their case". Examples are Blocking Carter's deposition for months, then allow for Flanders to perjure himself. (BIXBY , FREDETTE affidavit)AG granted four time extensions for the RFI from summer 2015 to 2016, then submitted the "fraudulent learning disability document" in my employee folder, along with 30 other pages that were never in my folder before.

This is what they do Navah, to throw off investigations. Be ready for more fraudulent evidence coming your way.

Thanks for listening.

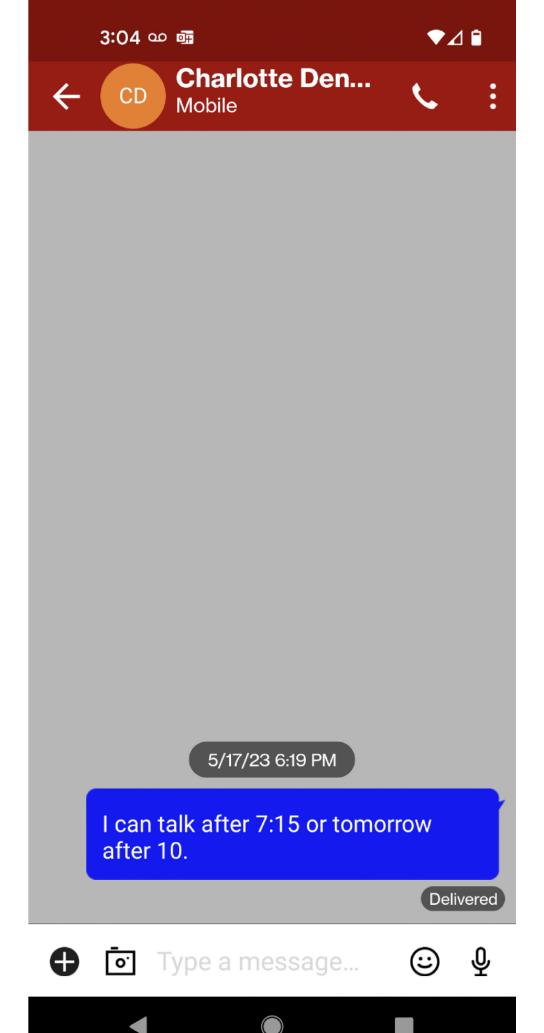


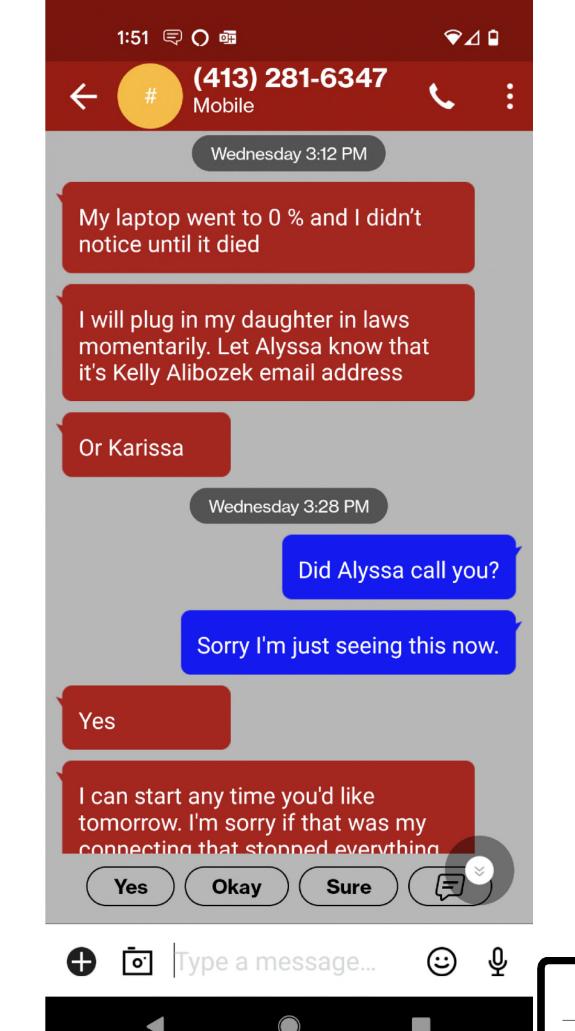












EXHIBIT

3

