

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.
4. The document production, bearing Bates nos. SDC000846-1197, included the following:
 - a. SDC000846-998: 26 e-mails with Gary Alibozeck and/or Sharyn Alibozeck;
 - 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
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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

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EXHIBIT

1

**+14132816347**

Mobile



2/23/21 8:22 AM

Hi Navah-

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.

Thank you.

5/29/21 10:42 AM

We will be sending that document in a few minutes.

9/19/21 2:02 PM

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...



EXHIBIT

2

3:04



+14132816347

Mobile



9/19/21 2:02 PM

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.

9/20/21 1:20 PM

Hi Gary, no updates on the case beyond what you see online. We're waiting for a decision from the panel on a few outstanding issues including the schedule. I can't say for sure that the case will or won't go forward on October. But my guess is that November is more likely. However the schedule is decided by the panel. Sorry I don't have more info.

9/20/21 1:53 PM

Ty

9/28/21 9:05 AM



Type a message...



3:04



+14132816347

Mobile



9/28/21 9:05 AM

Do you have any idea when the panel will reconvene for the purpose of decision making?

9/28/21 9:15 AM

Unfortunately I don't

Sent

9/28/21 9:49 AM

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



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.



Type a message...



3:04



CD

Charlotte Den...
Mobile



5/17/23 6:19 PM

I can talk after 7:15 or tomorrow
after 10.

Delivered



Type a message...





(413) 281-6347
Mobile



Wednesday 3:12 PM

My laptop went to 0 % and I didn't notice until it died

I will plug in my daughter in laws momentarily. Let Alyssa know that it's Kelly Alibozek email address

Or Karissa

Wednesday 3:28 PM

Did Alyssa call you?

Sorry I'm just seeing this now.

Yes

I can start any time you'd like tomorrow. I'm sorry if that was my connecting that stopped everything

Yes

Okay

Sure



Type a message...



EXHIBIT

3

**(413) 281-6347**

Mobile



I can start any time you'd like tomorrow. I'm sorry if that was my connecting that stopped everything

It wasn't your connection. It was a coincidence. A water main broke in Montpelier at the same time that you lost your connection. Life is weird

Wednesday 3:43 PM

👍 "It wasn't your connection. It was a coincidence. A..."

Wednesday 4:35 PM

Did I do ok so far?

Wednesday 5:25 PM

I'll call you in about 10 minutes

Sent

Yes

Okay

Sure



Type a message...



**(413) 281-6347**

Mobile



I'll call you in about 10 minutes

Sent

Thursday 8:56 AM

I have been waiting for ten minutes to connect

Thursday 6:19 PM

Did Sharyn and I do well today?

Friday 1:58 PM

I sent Margaux a msg when Watts dismissed count 2? I asked why it was dismissed!!??

Yesterday 10:20 AM

1 Unread Message

Can we talk again at some point?

Yes

Okay

Sure



Type a message...

