

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF RICHMOND**

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In the Matter of the Application of

**EMIL CANGRO and CARLO CANGRO, as
Individuals and as Members of CLOVE ROAD
DEVELOPMENT, LLC;**

Index No. 85034/2018

**For the Judicial Dissolution of CLOVE ROAD
DEVELOPMENT, LLC, a Limited Liability Company
Pursuant to Section 702 of the New York Limited
Liability Company Law,**

AFFIDAVIT

Petitioners,

-against-

**CLOVE ROAD DEVELOPMENT, LLC, ANTHONY
SENECA, CARLEEN BUONO, CLAIRE KHORSANDI
ESTATE, MANOOTCHER KHORSANDI, the Attorney
General Of the State of New York, as an Interested Party,
and NYS Department of Taxation and Finance, as an
Interested Party,**

Respondents.

-----X
In the Matter of the Application of

**EMIL CANGRO and CARLO CANGRO, as
Individuals and as Directors and Shareholders of
C. SENECA CONSTRUCTION, INC.,**

Index No. 85035/2018

**For the Judicial Dissolution of C. SENECA
CONSTRUCTION, INC, pursuant to Section
1104a of the New York Business Corporation
Law,**

AFFIDAVIT

Petitioners,

-against-

**C. SENECA CONSTRUCTION, INC., ANTHONY
SENECA, CARLEEN BUONO, CLAIRE KHORSANDI
ESTATE, MANOOTCHER KHORSANDI, the Attorney
General Of the State of New York, as an Interested Party,**

and NYS Department of Taxation and Finance, as an Interested Party,

Respondents.

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In the Matter of the Application of

**EMIL CANGRO and CARLO CANGRO, as
Individuals and as Members of FLAGG PLACE
DEVELOPMENT, LLC,**

**For the Judicial Dissolution of FLAGG PLACE
DEVELOPMENT, LLC, a Limited Liability Companies
pursuant to Section 702 of the New York Limited
Liability Companies Law,**

Petitioners,

Index No. 85036/2018

-against-

AFFIDAVIT

**FLAGG PLACE DEVELOPMENT, LLC, ANTHONY
SENECA, ROY K. DANISCHEWSKI, AS TRUSTEE
OF CARLEEN BUONO TRUST, CLAIRE KHORSANDI
ESTATE, MANOOTCHER KHORSANDI, the Attorney
General Of the State of New York, as an Interested Party,
and NYS Department of Taxation and Finance, as an
Interested Party,**

Respondents.

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STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

Emil Cangro, being duly sworn, deposes and says under penalties of perjury:

1. My brother (Carlo) and I own three (3) business with the Respondents:
 - a. C. Seneca Construction, Inc.;
 - b. Clove Road Development, LLC; and
 - c. Flagg Place Development, LLC (the "Companies").

2. Collectively, my brother and I own twenty-five percent (25%) (*i.e.*, 12.5% each) of each of the three Companies.

3. The Companies' owners are:

Anthony Seneca	25%
Trust	25%
Khorsandi Estate	25%
Emil Cangro	12.5 %
Carlo Cangro	12.5 %

4. The Companies are family businesses that own, develop, and lease real estate on Staten Island.

5. Mr. Seneca and Claire Khorsandi (who has passed away) were the managers of the Companies.

Right now, only Mr. Seneca serves as manager of each of the Companies.

6. Mr. Seneca is my uncle – my late mother's brother.

7. Since 2005, my uncle, Mr. Seneca, has assumed total control of the Companies.

8. Since 2005, my uncle, Mr. Seneca, has excluded my brother (Carlo Cangro) and I from participation in the Companies' governance, business affairs, and profits.

9. On numerous occasions, I have asked Mr. Seneca for information regarding the Companies – in particular information regarding the Companies' finances. Mr. Seneca has denied each my requests (often abruptly and crudely).

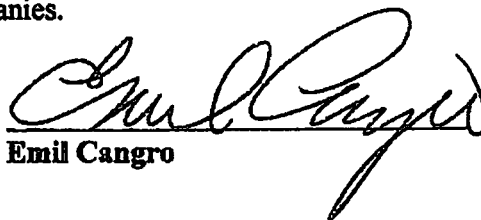
10. I have no idea where the Companies' bank accounts are maintained. As such, I am unable to monitor the Companies' revenue and expenses.

11. Similarly, Mr. Seneca refuses to report the income from the Companies' real estate holdings. I also have no information regarding whether the Companies' real estate is properly insured. That is concerning because I am also without any information as to the real estate's condition. I fear that Mr. Seneca's continuing secret and exclusive "management" of the Companies exposes the Companies to liabilities.

12. I am seeking dissolution of the three Companies – there is no way the Companies can continue to function as they currently do. Additionally, my relationship with Mr. Seneca – business and personal – has irreversibly deteriorated to one of distrust and contention.

13. Given Mr. Seneca’s wholly exclusive control of the Companies, there is a strong likelihood that the Companies’ assets will be lost, hidden, or destroyed by Mr. Seneca during the pending of this lawsuit.

14. Once the Companies’ assets are lost, hidden, or destroyed, I will have no adequate means of recovering the value of my ownership interest in the Companies.


Emil Cangro

Dated: January 28, 2019
Staten Island, New York

SHEILA VOYARD SAMPSON
Notary Public, State of New York
No. 01VO8278663
Qualified in Kings County
Commission Expires March 25, 2021

Sworn to before me this
28 day of January 2019.


Notary Public

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and NYS Department of Taxation and Finance, as an
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Respondents.

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STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

Carlo Cangro, being duly sworn, deposes and says under penalties of perjury:

1. My brother (Emil) and I own three (3) business with the Respondents:
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6. Mr. Seneca is my uncle – my late mother’s brother.
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Carlo Cangro

Dated: January 26, 2019

Staten Island, New York

Sworn to before me this
26 day of January 2019.



Notary Public

THOMAS DAMBRA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 3, 2023