

3. Oxford Mr. Kyriak failed to comply with Justice Kitzes' February 20, 2008 Order which directed them to provide certain "balance sheets, profit and loss statements, financial statements, accounts payable and accounts receivable of Oxford Associates Group, Inc.,"¹

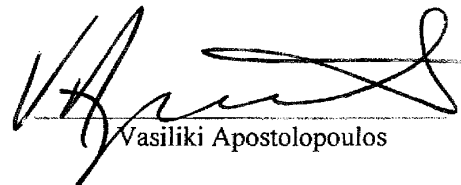
4. Mr. Kyriak's August 6, 2019 Affidavit is the first and only notice to me that he unilaterally deemed himself the sole owner of Oxford and Lancaster despite the fact that I am and have been a fifty-percent (50%) shareholder of those corporations since they were formed.

5. It was not until after the commencement of this proceeding that Mr. Kyriak - - who controls Oxford and Lancaster - - repudiated his fiduciary obligations to me, as a 50% shareholder of Oxford and Lancaster.

6. Respondents Oxford, Lancaster and Kyriak have failed to: (a) provide me with any information concerning Oxford and Lancaster; (b) pay me any dividends or profits from Oxford or Lancaster; and (c) provide me with any notices of shareholder meetings or resolutions of Oxford and Lancaster.

7. Thus, Mr. Kyriak has frozen me out of Oxford and Lancaster and apparently now seeks to misappropriate my 50% interest in those two corporations to himself.

8. Finally, contrary to the allegations contained in paragraph "10" of Mr. Kyriak's Affidavit, it was never agreed, understood or even discussed that I would relinquish my valuable 50% ownership interests in Oxford and Lancaster.


Vasiliki Apostolopoulos

¹ That Order is annexed as Exhibit "B" to both the Verified Petition and the proposed Amended Verified Petition