

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

ELIYAHU MIRLIS, : CASE NO. 3:16-cv-00678 (MPS)  
Plaintiff, :  
v. :  
RABBI DANIEL GREER and YESHIVA OF :  
NEW HAVEN, INC., :  
Defendants. : OCTOBER 27, 2017

**AFFIDAVIT OF WILLIAM J. WARD, ESQ.**

The undersigned William J. Ward, Esq., being duly sworn, deposes and states as follows:

1. I am over eighteen years of age and believe in the obligations of an oath.
2. I am an attorney admitted to practice in the State of Connecticut, with offices at 336 Torrington Road in Litchfield. As the Court is aware, I am one of the counsel of record for defendants Daniel Greer and Yeshiva of New Haven, Inc.
3. On July 26, 2017, I was in the Connecticut Superior Court, G.A. 4 in Waterbury, on an unrelated matter. While there, Attorney Fanol Bojka approached me and told me that an individual had contacted him about information he had that was potentially relevant to this case. Attorney Bojka stated he had not spoken to this individual, but said he would forward to me the message he had received.
4. On the afternoon of July 26<sup>th</sup>, I received an email from Attorney Bojka that included the actual communication he had received from the prospective witness. The body of the message read, "I'm trying to determine whether you're the attorney who defended Rabbi Greer. If this is the case, please contact me for undisclosed information about the plaintiff . . . ". It also included the individual's email and phone number.


5. I subsequently spoke to the individual on multiple occasions. The information he conveyed is outlined below. This summary is based on statements made directly to me, as well as to others representing defendant Greer.

- the individual holds a Ph.D. in Chemistry. He taught at the Gan School/Yeshiva of New Haven during the 2002-03 and 2003-04 academic years, in the school's high school program.
- the individual recalls minimal contact with Daniel Greer. He recalls being hired by Sarah Greer. He reported to Aviad Hack, who ran the high school during his time teaching at the Yeshiva.
- the individual taught math and science at the school. Plaintiff Eliyahu Mirlis was one of his students.
- the individual observed unusual behavior by Mirlis. For instance, he would throw tantrums in class, and on at least one occasion engaged in destructive behavior while shouting he wanted to "kill all the Christians". The individual also believed, based on his interaction with him, that Mirlis had a poor character for truthfulness; he described him as a frequent liar.
- the individual also had the opportunity to observe the relationship between Avi Hack and Mirlis during his two years at the Yeshiva. He found the relationship to be very unusual – in his opinion, not a normal student/teacher relationship. He often saw Mirlis in Avi Hack's office, sitting on his desk or on a table in the office. This happened multiple times per week. On at least one occasion he saw them embrace.
- the individual's association with the school ended because of a disagreement with Avi Hack over his (the individual's) treatment of Mirlis. The individual gave Mirlis an 'F' in a math class. Hack told him he had to change the failing grade to a much higher passing grade, and the

individual refused to make the change. The individual believes that Hack ultimately made the change.

- the individual resigned his position as a result of this incident, which occurred toward the end of the '03-'04 school year. He then moved on to a position as a chemistry professor at a university in New York City.

- the individual never shared his information about the Hack-Mirlis relationship with Daniel Greer. As noted, he reported to Aviad Hack during his years teaching at the Yeshiva, and had very little contact with Daniel Greer. He was motivated to come forward and share his information with defense counsel after learning about the verdict and damage award in this case.



William J. Ward, Esq.

Subscribed and sworn to me before me this 27<sup>th</sup> day of October, 2017.



Maryanne A. Holland  
Notary Public/Commissioner of Superior Court  
My Commission Expires: \_\_\_\_\_

