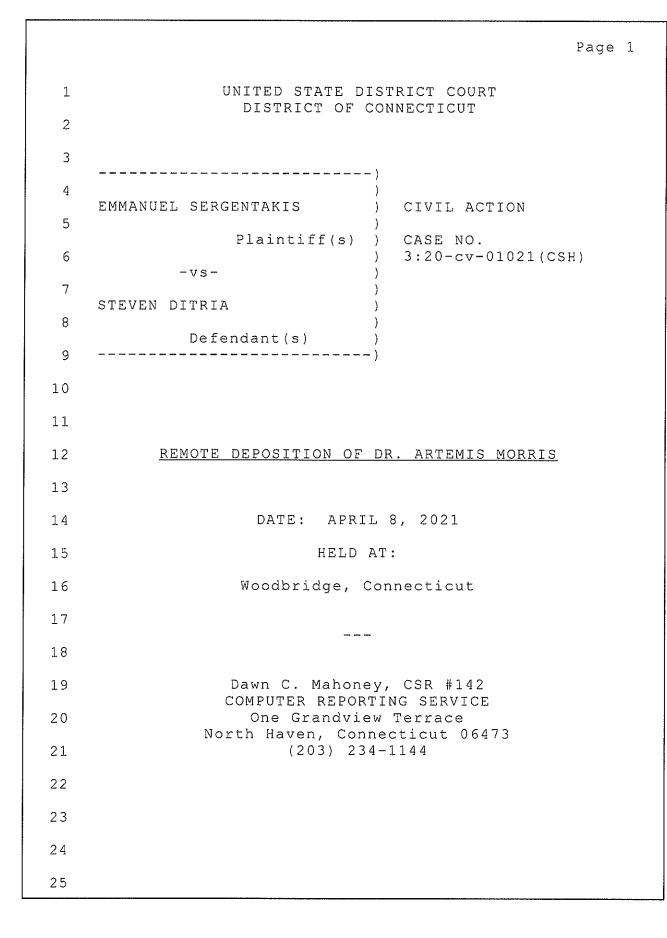
EXHIBIT A

[Excerpts of Deposition Transcript of Dr. Morris]



MORRIS - DIRECT - BUTURLA Page 11 that. So currently they're at school. 1 Q Like I said before, my five- and 2 3 eight-year-olds are a bit of a handful when they're being home-schooled. 4 It's very difficult for young kids. 5 A It is. They'll all be better at 6 Q technology after this, that's for sure. 7 I understand that you were previously 8 married to Mr. Sergentakis? 9 A Correct. 10 11 Q Are you presently married? А No. We officially divorced on July 23rd 12 of 2019. 13 How did you meet Mr. Sergentakis? 14 Q His family knew my family, and while I was 15 А vacationing in Crete, in Greece -- it was many 16 years ago -- I met him through the family. 17 And how long were you married to 18 Q Mr. Sergentakis? 19 Seventeen years. 20 А 21 Q Seventeen years? A Uh-huh. 22 Do you know what he does for employment, 23 0 if anything? 24 25 During the divorce he was given one of my А

MORRIS - DIRECT - BUTURLA Page 10 medicine, and I also am a licensed acupuncturist. 1 2 I have my master's in acupuncture and I do that as well. 3 All right. I'm going to have to pick your 0 4 5 brain on the nutrition aspect of things. COVID hasn't been great over here. 6 I wrote a book on how to stay well during A 7 the pandemic. I'm happy to share that with you. 8 What's the name of that book? Q 9 10 A "Naturopathic Doctor's Guide to Wellness for Immune Support." It's on the Amazon. That was 11 12 my project when things closed down. I tried to figure out how I'm going to help my patients and my 13 14 community and that came out of it. Very interesting. In terms of some more 15 Q background questions, I understand you have two 16 children? 17 A I do. 18 And they're nine-year-old twins? 19 Q 20 А They are. Are they presently home-schooled? Or, how 21 Q 22 has that whole thing been working out for you? А I have to say that Beecher School in 23 Woodbridge has done a wonderful job. They've been 24 mostly in person and they've done a great job of 25

MORRIS - DIRECT - BUTURLA Page 8 Okay. I understand you're testifying from 1 Q your home in Woodbridge? 2 3 А That's correct. I also understand that you work as a Q 4 5 naturopathic doctor over here in Milford, Connecticut? 6 Yes, I do. 7 A 8 Q How long have you been doing that for? А Twenty years. 9 Have you always worked in Milford or have 10 Q you worked in other areas of the state? 11 I owned Wellness Center in New Haven, I 12 А was the Director of Integrated Medicine at Masonic 13 Hospital, and I had a couple of other offices, 14 another one in New Haven, another one in 15 Wallingford, and I worked briefly as an 16 acupuncturist in Pennsylvania. 17 And my other hat is I also am a professor 18 of nutrition and the Co-Academic Director of a 19 20 master's program in Bethany. 21 Q Okay. I'll avoid asking questions about the acupuncture part because I personally do not 22 like needles. I'm trying to figure out how that 23 whole area works. It's one that I stay away from. 24 25 А I have a lot of patients that don't like

MORRIS - DIRECT - BUTURLA Page 12 businesses. So I assume that he is -- he has 1 retained that business. 2 3 0 Is that the Wellness Center located in New Haven? 4 A Yes, that's Revive Wellness Center. He 5 was given that during the divorce. So I imagine 6 he's managing it but I don't know. 7 In terms of his employment background, 8 Q aside from being involved in the Wellness Center, 9 10 do you know anything else about his employment background? 11 A I know he learned computer science in 12 college. I know he would sell things, you know, 13 online sometimes, furniture, work for his friends. 14 That's about it. I'm not sure. 15 He has at least some degree of IT-type 16 Q background? 17 А He has an IT background and he did the 18 operations management and some insurance billing 19 for the business. He has an IT background. Him 20 and his brother, actually. Yeah, he's very skilled 21 22 in IT. 0 Okay. I know I asked you if you had given 23 24 any prior deposition testimony before, but a few 25 more background-type questions. Have you ever

MORRIS - DIRECT - BUTURLA 1 the business, the primary bread winner. I worked all day, took care of the kids full time, and then 2 would come home and be yelled at and threatened and 3 abused. 4

0 All right. In terms of some of what you 5 6 had just described, that took place over a period of time leading up to basically the October 2017 7 filing? 8

А Correct.

9

0 You mentioned ways that you were verbally 10 11 abused by Mr. Sergentakis, but I believe you also mentioned physical abuse; is that right? 12

13 А There was not a lot of physical abuse, but there was, you know, one incident where I did have 14 to file a restraining order. During the time that 15 I filed for divorce, and I actually got a divorce, 16 there were -- I was in the house with him and I 17 feared for my life and the safety of my children on 18 a daily basis. 19

20 Q That was while the divorce was pending? Yes. That was from October 31, 2017. I 21 A 22 mean, in some ways there is still a little vestige 23 of that. But once he got out of the house and once there was an official dissolution in 2019, I felt a 24 25 little better but there are still things that

MORRIS - DIRECT - BUTURLA Page 14 1 0 I'm going to ask you some questions about your relationship with Mr. Sergentakis leading up 2 to divorce. Okay? 3 Okay. А 4 And I don't mean to pry or ask anything 5 0 overly personal, but your relationship with 6 Mr. Sergentakis, or at least your previous 7 relationship, is somewhat relevant to what's been 8 going on in connection with this lawsuit involving 9 my client, Detective Ditria, and Mr. Sergentakis. 10 11 A Certainly. Could you tell me what caused you to file 0 12 for divorce in October of 2017? 13 Yes. I was being verbally abused and 14 А physically abused and Manny was yelling at me in 15 front of the kids after I worked full days, calling 16 me a slob in front of the kids. Basically, I love 17 18 myself and I deserve to be happy and I didn't want to have my kids think that it was okay to see 19 20 verbal abuse and to be in a verbally abusive situation. I had to divorce him. 21 22 And also, he was physically abusive. I 23 never knew where he was. I never knew what he was doing. He refused to tell me anything about the 24 finances, even though I was the primary owner of 25

MORRIS - DIRECT - BUTURLA Page 17 out money on a personal line of credit, over 1 20,000. I'm still dealing with some of those 2 3 financial issues. 4 He, in front of the kids, threatened to 5 send me to jail for taxes, even though he did all the taxes, which made my kids cry. He stole over 6 7 \$53,000 that the Court awarded me back during the arbitration, which was in February. No. March of 8 2019. But it still did not account for all of the 9 money he stole from me. So I'm still dealing with 10 11 some of the financial abuse. Now, you mentioned during the divorce 12 Q proceedings you pursued a restraining order against 13 Mr. Sergentakis? 14 15 А Yes. 16 Q The time period I have on that is roughly November 2018. Would that sound about right? 17 А Yes. 18 I know you may have described a little bit 19 Q of this, but what led you to pursue that 20 21 restraining order at that time? I mean, as I mentioned, when he was in the А 22 house I feared for my life. He threatened me every 23 day. I feared for the safety of my children on a 24 daily basis. So up until the -- one of the 25

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stipulations, which was in August of 2018, he was 1 2 in the house and so we each had a month to get our stuff. He threatened, stalked me during that time. 3 One day my mom was watching the kids while 4 I was working and he just showed up. He threatened 5 my mother's life. He had his hands in his pockets. 6 I knew he had guns. My mom almost had a heart 7 attack. So that incident happened. And then one 8 day my son was sick and he refused to tell me where 9 my children were. He got an apartment somewhere. 10 I had no idea where my kids were for a month. My 11 lawyer had to find out where my kids were. And I 12 was awarded full legal and physical custody of the 13 14 children by the Court, and that was in 2019.

When I went to go pick up my son, and he 15 goaded me to come to the office, which, you know, 16 was given to him in the divorce, and there I saw 17 that he had stolen some of my inventory. When I 18 19 attempted to go get it, he blocked me and I felt very threatened. He was -- he assaulted me on that 20 21 occasion where I had some bruises and cuts on my hands. So there was that incident and leading up 22 to the daily threats, the threat to my mother's 23 24 life, the fact that I knew he had guns. 25 And also, when I went to Pennsylvania to

MORRIS - DIRECT - BUTURLA Page 22 coattail of him threatening my mother's life 1 shortly before and I was very scared. 2 3 0 In terms of the reference to going to Pennsylvania, that was so you could secure any of 4 the belongings that you had left in that house? 5 Yes. That was a house we were -- that was 6 А the kids' first house. That's where I lived. I 7 8 drove back and forth for years there. But I had lived there and that's where my things were. I had 9 30 days to get them out and he had prevented me 10 from going there. 11 As I mentioned, he sent me threatening 12 texts, you know, as well that made me fear for my 13 life and my safety. I didn't know what to do and 14 that's why I reached out to Steven, to Detective 15 Ditria, to see, you know -- I mean, even just to 16 know that someone else knew where I was going in 17 case something happened. I didn't know what else 18 to do. 19 20 Q Okay. You referenced some concerns about Mr. Sergentakis owning or possessing guns, right? 21 А Yes. 22 Q All right. Did you seek information or at 23 least confirmation perhaps as to Mr. Sergentakis's 24 25 owning of firearms?

MORRIS - DIRECT - BUTURLA Page 21 Q All right. What was your purpose for 1 2 reaching out to Detective Ditria when you did? I feared for my life and I feared for the A 3 safety of my kids and I didn't know what to do. 4 So I reached out to him because I thought maybe he 5 could help. I didn't know what -- I had no one who 6 7 I knew who could protect me against me ex-husband's violence. So that's why I reached out. 8 And you knew Detective Ditria was a 9 0 detective with the Seymour Police Department, 10 right? 11 12 A Yes. What information were you provided or did 13 Q you ask of Detective Ditria during some of the 14 times that you reached out to him and spoke with 15 him and things of that nature? 16 A So I basically reached out to him and I 17 said -- I asked him, you know, what I should do to 18 19 protect myself in that situation, what my rights were. I wasn't sure. And I wondered if I should 20 call the police when I got to Pennsylvania. I just 21 reached out in general to see if he had any general 22 advice as to what my rights were and how I could 23 24 protect myself. That was also in addition -- like on the 25

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How did you construe that text message? 1 А I construed it as he was threatening to 2 kill me, he was threatening to hurt me, he was 3 threatening to do me harm, and without any regard 4 to my safety or the future of our children. And he 5 had sent me other messages in the past that said 6 he, you know, was threatening me and would rather 7 -- was using our children as pawns to threaten me. 8 He didn't care who he hurt as long as he hurt me. 9 So I was definitely threatened by that text 10 11 message. And that's one of things that caused you 0 12 to pursue the restraining order through the court 13 system, right? 14 А There were multiple incidents but that 15 absolutely was another one of -- leading up to the 16 point, he was becoming more and more dangerous, he 17 was becoming more and more unpredictable, and I did 18 fear for my safety and the safety of my children. 19 Yeah. 20 Around that time frame, and I understand 21 0 you're an acquaintance of Detective Ditria, but I 22 also understand that you have reached out to 23 Detective Ditria; is that right? 24

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Yes.

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1	A I knew that Manny had multiple firearms.
2	He would show them off when there were parties in
3	Pennsylvania. He would carry when he was at
4	Revived Wellness Center. He would kind of show it
5	off to his buddies. He had multiple guns. He had
6	gun safes in Connecticut and Pennsylvania. He
7	tried to show the kids how to shoot. It was he
8	was very into guns.

9 I also found, you know, information --10 this was another issue why I filed a restraining 11 order. He had IDs. He had aliases. He had an 12 alias Arnold Chisam (phonetic) where he took out a 13 fake Social Security card, a fake driver's license 14 to buy -- to illegally purchase guns in New York 15 with.

Considering his moral character and how 16 some of the guns may have been unregistered, I 17 18 didn't know, I was very concerned about the fact 19 that he would send these threatening text messages, the way he threatened my mother's life, and going 20 21 up to Pennsylvania to get my stuff I didn't know what was going to happen. I don't know if I 22 answered your question, but I just kind of --23 Q That's fine. In terms of the guns, any 24 idea how many guns Mr. Sergentakis had owned around 25

MORRIS - DIRECT - BUTURLA Page 24 that time of 2017, 2018 or so? 1 2 A I'm going to guess a dozen but I don't 3 know. I know he had illegal bullets at one point that he would show off to his friends. He did have 4 some illegal firearms and bullets that he would 5 show off at parties to his buddies. 6 7 0 You referenced a concern of possible fake identification or aliases and you mentioned a name 8 but I didn't catch it. What was the name that you 9 had mentioned? 10 It's Arnold, A-r-n-o-l-d -- let's see. I А 11 have them. This is a different -- that was a 12 different alias. This alias -- he had a couple. 13 This one was Michael, M-i-c-h-a-e-l, last name 14 S-e-r-q-e-v-i-k. So he had a fake driver's license 15 registered under Michael Sergevik at 1405 Avenue Z, 16 Apartment 622, Brooklyn, New York 11235, and that 17 was in 1995. And he also has a pistol license with 18 19 that alias. And he had a Falcon 5227 -- I have the serial number here if you want it, and a Glock E52 20 underneath that alias. 21 And I showed these to the police but they 22 didn't do anything about it when I filed the 23 24 restraining order. All right. But, obviously, you were 25 Q

MORRIS - DIRECT - BUTURLA Page 25 concerned that maybe there were some weapons that 1 were not linked or registered directly to his name; 2 is that right? 3 А Absolutely. And he also -- I'm sorry if 4 I'm getting ahead of myself. After I filed a 5 restraining order, he refused to give up his guns. 6 I still don't know if he has them. That's why I'm 7 still concerned. 8 Q We'll get there in a minute. In terms of 9 your contacting Detective Ditria, was part of your 10 concern the fact that Mr. Sergentakis had some of 11 these aliases and also had several firearms I guess 12 linked to those aliases, so to speak? 13 Yes. I knew that my ex-husband had 14 A firearms. I knew he had no regard for social or 15 moral code. He had aliases and he had guns 16 registered under aliases. He verbally abused and 17 threatened me. He threatened to kill my mother. 18 19 He stalked me. He broke into the -- later on this will come up. He would break into my emails. He 20 violated my privacy. That's how this case actually 21 22 came about, by violating my privacy with my Facebook. 23 With that text message that I got that you 24 won't like the outcome, there's broken glass, I 25

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1	can't guarantee your safety, you know, I was very
2	scared and didn't know what happened. I had to go
3	up and get my things. I wanted to get some of the
4	kids' things that I know like I still this is
5	years later. There's videos of my daughter walking
6	for the first time that I may never have access to.
7	Q It's okay. Take a quick minute. I know a
8	lot of this isn't easy and I thank you for doing
9	your best today.
10	A That's why I reached out to Detective
11	Ditria, just to, you know, reach out to see how I
12	could have my I just wanted to have someone to
13	reach out for my safety and just to know where I
14	was going and to see what I should do once I get
15	there. Because, you know, I was going to have to
16	go to another state to get my things and it was
17	court ordered that I could do so. But like I said,
18	he was very unpredictable.
19	Q Understood. You mentioned what you
20	believed to be a violation of your privacy
21	involving your Facebook. What did you mean by
22	that?
23	A As far as I know, the reason for this case
24	even being here is because my ex-husband violated
25	my privacy by in which he did multiple times

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throughout our marriage. I don't know if he's 1 still bugging me. Basically, I had my own 2 3 Facebook. He was never a friend. He was not associated with it. He looked at my Instant 4 Messages and somehow found out that I had reached 5 out to Detective Ditria. I think that's what this 6 case is about where he's -- you know, he tried to 7 8 hurt him in any way.

This is what my husband did, he violated 9 my privacy. He was posing as me during the bank to 10 steal my any bank account; he stole over 20,000. 11 I'm still dealing with some of that credit card 12 fraud and some of that debt. He stole money out of 13 my mailbox in Milford and he deposited it into 14 accounts. He took some of my accounts out of hold 15 during the divorce. So he absolutely, you know, 16 has been violating my privacy. I believe he also 17 did so for this case, which shocks me. 18

I don't understand how there could be a case against someone that's, you know, using information that was illegally obtained. That is just so shocking to me that the Court and the law allows someone who has no social or moral compass like my ex-husband to manipulate the law and to use it in order to hurt innocent people like myself and

MORRIS - DIRECT - BUTURLA Page 28 Detective Ditria who was just trying to help me 1 2 out. Now, I understand in terms of the Facebook 3 0 message and the information that you believe that 4 your husband accessed that was sent to you from 5 Detective Ditria, that information was what? Ιt 6 7 involved his name, confirming his background information, and his ownership of potential 8 9 firearms? Is that what it was? Yes. I have it right in front of me. A 10 The only thing that Detective Ditria shared with me was 11 information I already knew. It was information 12 that he had a gun registration. It was information 13 14 I already knew. That was it. 15 0 Is it fair to say that it confirmed for you that he, in fact, did have weapons and perhaps 16 17 registered to at least his name as Mr. Sergentakis? Yes. А 18 19 0 What, if anything, did you do with that information that was shared privately with you? 20 21 А I didn't do anything with the information. It wasn't anything new for me. Nothing was done 22 23 with it. I basically forgot about it and went to Pennsylvania. There was nothing done with that 24 25 information. It was confidential information. Ιt

MORRIS - DIRECT - BUTURLA Page 29 was not shared. 1 The only person who shared that 2 confidential information by breaking into my 3 Facebook and breaking into my privacy was Emmanuel 4 Sergentakis. So the fact that there's a violation 5 of that privacy, he violated my privacy to find 6 this information and utilize that in order to hurt 7 a detective that was trying to help me because I 8 9 was being abused and, you know, a victim of domestic violence. So the only person who actually 10 violated this information was Emmanuel Sergentakis. 11 Understood. You mentioned a refusal by 12 0 Mr. Sergentakis to give up his guns. Now, I 13 understand there was the restraining order from 14 November of 2018, and I also understand 15 Mr. Sergentakis was arrested on or about November 16 19, 2018, apparently by New Haven Police. 17 What is your understanding of his arrest 18 19 at that time? After I filed for a restraining order, he 20 А refused to give up his guns. I felt extremely 21 un -- I feared for my life and the safety of my 22 23 kids even more, because not only was he out there and restraining order on him but he refused to give 24 25 up his firearms. So he threatened my mother, he

MORRIS - DIRECT - BUTURLA Page 31 understanding that the violation of the restraining 1 order was related to his refusal to give up his 2 weapons; is that correct? 3 4 A It absolutely was related to his refusal 5 to give up his weapons. That arrest was because he refused to give up his weapons after a restraining 6 order. If the arrest was 11/19, the restraining 7 order was 11/14. There was a period of time where 8 9 he was very unpredictable. 1.0 Q I take it from some of your earlier 11 testimony to be that you're still concerned somewhat for your own safety with regard to your 12 13 ex-husband; is that correct? 14 А Yes. I still don't know if he has guns. 15 I don't know where he has them. He hasn't been communicative about the children. I have full 16 17 legal and physical custody. Yeah, he has no social and moral compass. Yeah, I still do feel that 18 19 there is a risk. 20 Q Just give me one moment, if you don't 21 mind. I just want to look through one thing. MR. BUTURLA: If everyone would like 22 to take a five-minute break, that's fine 23 with me. 24 25 THE WITNESS: Okay.

50 1 CERTIFICATION 2 3 STATE OF CONNECTICUT) ss. East Haven) DISTRICT OF NEW HAVEN 4) 5 I, DAWN C. MAHONEY, Court Reporter and Notary 6 Public within the State of Connecticut, duly commissioned and qualified, do hereby certify that 7 pursuant to Notice, Dr. Artemis Morris, the deponent herein, was by me first duly sworn to testify to the 8 truth, the whole truth and nothing but the truth of her knowledge touching and concerning the matters in 9 controversy in this case; that she was thereupon carefully examined upon her oath and her examination 10 reduced to typewriting by me; and that the deposition is a true and accurate record of the 11 testimony given by the witness. I further certify that I am neither attorney or 12 counsel for, nor related to or employed by, any of 13 the parties to the action in which this deposition is taken, and, further, that I am not a relative or 14 employee of any attorney or counsel employed by the parties hereto or financially interested in the 15 outcome of said action. In witness whereof I have hereunto set my hand 16 and affixed my notarial seal this 29th day of April, 172021. 18 (My commission expires April 30, 2026) 19 20 21 22 23 Dawn C. Mahoney, Notary Public, CSR #00142 24 25