

**STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION
CIVIL INVESTIGATIVE DEMAND**

**TO: J.R.K. Property Holdings and J.R.K. Residential Group
11766 Wilshire Boulevard, Suite 1500
Los Angeles, California 90025**

And

**c/o National Registered Agents, Inc.
357 East Center Street, Ste. 2 J
Manchester, CT, 06040-4471**

And

**Brian J. Wheelin
Robinson & Cole, LLP
9th Floor
Stamford, Connecticut 06901
bwheelin@rc.com**

BY AUTHORITY OF THE STATE OF CONNECTICUT, and more particularly, pursuant to the Connecticut Unfair Trade Practices Act (“CUTPA”), Chapter 735a of the Connecticut General Statutes, and the authority granted the Commissioner of Consumer Protection for the State of Connecticut by virtue of Section 42-110d of the Connecticut General Statutes, **J.R.K. Property Holdings** and **J.R.K. Residential Group** (collectively the “Respondent”), are hereby commanded to present to the Commissioner, UNDER OATH, by delivering to the Department of Consumer Protection, c/o Jonathan J. Blake, Assistant Attorney General, Office of the Attorney General, 165 Capitol Avenue, Hartford, Connecticut 06106, Jonathan.blake@ct.gov on or before **5:00 in the afternoon of February 23, 2026**, answers to Interrogatories and Documentary material in connection with an investigation into the maintenance and management of residential apartments known as the Concierge Apartments in Rocky Hill, Connecticut, which may constitute unfair or deceptive acts or practices in violation of CUTPA. The Respondent is notified not to destroy, discard, alter in any manner, or transfer from its possession, any Documentary material requested or identified in any of the Respondents’ responses to the Interrogatories and Document requests herein.

I. DEFINITIONS

This Civil Investigative Demand ("CID") shall be read and interpreted in accordance with the definitions set forth below:

- A. “Advertisement” or “Advertise” means and includes at a minimum: any written, oral, graphic, or electronic statement, illustration, or depiction that is designed to create interest in the leasing or purchasing of, impart information about the attributes of, publicize the availability of, or affect the sale, lease, or use of, real property, goods or services, whether the statement appears in a brochure, newspaper, magazine, free standing insert, marketing kit, leaflet, mailer, book insert, letter, catalog, poster, chart, billboard, electronic mail, website, social media platform, or other digital form, slide, radio, broadcast television, cable television, or commercial or infomercial whether live or recorded.
- B. “All” means all or any, and “Any” means all or any.
- C. “And,” “All,” or “Or” shall be construed either conjunctively or disjunctively to bring within the scope of the request any information that might otherwise be construed to be outside its scope.
- D. “Communication” means all meetings, conversations, conferences, discussions, correspondence, emails, text messages, messages, telegrams, telefaxes, mailgrams, and all oral, electronic, and written expression or other occurrences whereby thoughts, opinions or data are transmitted between two or more individuals.
- E. “Concierge Apartments” means the apartment complex located at 98 Cold Spring Road, Rocky Hill, Connecticut.
- F. “Consumer” means and includes any person, a natural person, individual, governmental agency or entity, partnership, corporation, trust, estate, incorporated or unincorporated association, and any other legal or commercial entity however organized.
- G. “Connecticut Consumer” means any Consumer with an address in Connecticut.
- H. “Contact” means any form of communication.
- I. “Custodian” means the person(s) who is/are most knowledgeable about the information and Documents requested herein, including:
 - 1. The location and method of record keeping for the Documents responsive to this Request; and
 - 2. The organization of the Documents as they are produced to the Commissioner pursuant to this Request.
 - 3. Respondent’s process for identifying Documents responsive to this Request. The person(s) shall have the ability to authenticate and identify each Document provided by you pursuant to the standard found in Fed. R. Evid. 902(11).
- J. “Describe” or “Description” means to state with specificity all facts, including but not limited to time, comprising or pertaining to such fact, thing, condition, action

or event, and to identify all individuals involved in such fact, thing, action or event.

- K. “Documentary Material” or “Document” means all Communications, as well as Computer Files and written, recorded, and graphic materials of every kind in Your possession, custody or control, wherever located, Including without limitation: information stored on social media accounts like Twitter or Facebook and Documents contained in Collaborative Work Environments and other Document databases; handwritten notes or annotations made on a Document; drafts of a Document; handwritten, typewritten, printed, recorded or graphic matter, however produced or reproduced; and any mechanical, magnetic or electronic recording of any voice, sound, image or data, or materials on or in any Computer System or Computer Storage, in its original or native format (Including any metadata). A draft or non-identical copy is a separate Document within the meaning of this term, whether due to a difference in custodian, marginalia, metadata, attachments affixed thereto, or otherwise. The term “Document” shall also include all Documents that are necessary to interpret, translate, decode or understand any other Document requested.
- L. “Entity” means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.
- M. “Identify” means:
1. In the case of a natural Person other than a Tenant: name, current - employer, business address, telephone number, email, and title or position;2.
In the case of a Person other than a natural person: name, principal address, telephone number and a natural person who can be contacted for information relating to the identified non-natural person;
 3. In the case of a Document, the title of the Document, the author, the title or position of the addressee, the type of Document, the date it was prepared, and the number of pages it comprises; and
 4. In the case of a non-written Communication, the date of the Communication, the type of Communication (telephone conversation, number etc.), the place where the Communication took place, the identity of the Person who made the Communication, the identity of each Person who received the Communication and each Person present when it was made, and the subject matter discussed.
 5. In the case of a Tenant: name, address of the rented premises, and a means of contacting the Tenant (e.g. telephone number, email address).
- N. “Including” means including but not limited to. “Person” means any individual, corporation, partnership, limited liability company, limited partnership, trust, business trust, association, joint stock company, joint venture, pool, syndicate,

“group” as defined in Section 13(d)(3) of the Securities Exchange Act of 1934 as amended, sole proprietorship, unincorporated organization, or any other form of entity.

- O. “Relating To” or “In Relation To” means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, pertaining to, reflecting to, or stating.
- P. “Relevant Period” means, unless otherwise noted, February 9, 2021, to the present. Any Interrogatory or Request for Production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.
- Q. “Respondent” means J.R.K. Property Holdings and J.R.K. Residential Group.
- R. “Tenant” means any natural Person who has leased residential premises at Concierge Apartments during the Relevant Period.
- S. “Work Order” means any notice provided to You by a Tenant of Concierge Apartments that seeks to remedy conditions that may constitute a violation of a fire and/or housing code.
- T. “You” or “Your” means Respondent.
- U. The singular includes the plural and vice versa, and a verb includes all other tenses where the clear meaning is not distorted by the addition of another tense or tenses.
- V. All defined terms have the means set forth herein regardless of whether they are capitalized or lowercase.

I. INSTRUCTIONS

The response to this CID shall be submitted in the following manner:

- A. ***Except where otherwise explicitly indicated, this CID covers the period from February 9, 2021, through the present (the “Relevant Period”).*** Any Interrogatory or Request for Production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.
- B. This is a continuing request for information. If, after making its initial response, Respondent obtains, discovers, formulates, or otherwise becomes aware of any further information that is responsive to any one or more of these Interrogatories or Document Requests, Respondent is required to supplement its response(s) and furnish such information as soon as such information becomes available.
- C. For the purposes of reading, interpreting, or construing the scope of the Interrogatories and Document Requests, the terms used shall be given their most expansive and inclusive interpretation.
- D. Unless instructed otherwise, each Interrogatory and Document request shall be construed independently and not by reference to any other Interrogatory or Document request for the purpose of limitation.
- E. Documents provided shall be complete and, unless privileged, shall be un-redacted, produced as maintained in the ordinary course of business in the company’s files (*e.g.*, Documents that in their original condition were stapled, clipped, or otherwise fastened together or maintained in separate file folders shall be produced in such form; attachments produced following the parent e-mail). You may submit photocopies (with color photocopies where necessary to interpret the Document), in lieu of original Documents, provided that such copies are true, correct, and complete copies of the original Documents.
- F. Documents should be produced as they are maintained in the normal course of business and should be labeled or organized in accordance with the requests to which they are responsive.
- G. Each page of each Document submitted shall contain a unique identifying number that also contains a uniform alphabetic prefix identifying You. All boxes, folders or media containing submitted Documents and ESI shall be marked with Your name and the name(s) of the person(s) whose files are contained in that box or folder.
- H. Before producing any Documents, you must contact Jonathan J. Blake, Assistant Attorney General, at Jonathan.blake@ct.gov, to arrange a meeting or conference call with the company’s personnel who are familiar with the particular ESI and the applications in which it is stored, to explain to the Connecticut Office of the Attorney General (“OAG”) representatives the manner in which the ESI is stored, and the types of information that are available in the application. OAG representatives must approve the format and production method for ESI in

advance. If responsive ESI resides in databases or applications, the company representative must be prepared to discuss queries or reports that can be run in order to furnish the responsive ESI. Electronic productions must be scanned for and free of viruses. The OAG will return any infected media for replacement, which may affect the timing of the Company's compliance with this Demand.

- I. Each document should be produced only once. If you plan to produce Documents and ESI that were previously produced, the current production must be de-duplicated. Please supply an index detailing the Document ID or Bates number for the current production along with every other Document ID or Bates number assigned to all Documents in relation to other productions. Produce deposition, proceeding, and trial transcripts in condensed or manuscript form, with a word index, and electronically on CD or DVD. The electronic version of the transcripts should be in Live notes PTF (Portable Transcript Format), PCF (Portable Case Format), or Plain Text format.
- J. If You are unable to answer or respond fully to any Interrogatory or Document Request, after exercising due diligence to secure information necessary to answer or respond to the fullest extent possible: (a) answer or respond to the extent possible, (b) specify the reason for Your inability to answer or respond in full, and (c) set forth the efforts You made to obtain the requested information.
- K. Your Document retention policy should be suspended to prevent the destruction of any Documents that may be relevant to the Department of Consumer Protection's investigation as described in this CID.
- L. Documents to be produced include all Documents in Your possession, custody, or control, wherever located, Including Documents in the possession, custody, or control of Your directors, officers, employees, representatives, or agents. Without limitation on the term "control," a Document is deemed to be in Your control if You have the right to secure that Document, or a copy thereof, from another person.
- M. If You cannot supply precise information, state Your best estimate or approximation (Including Your best approximation of date by reference to other events, when necessary), and designate the response as an estimate or approximation.
- N. If You contend that any Interrogatory or Document demanded by this CID is privileged in whole or in part, file with Your response to this CID a statement in writing and under oath and in such statement: (1) identify each such Interrogatory or Document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a Document, then in addition to the statement required herein, produce a copy of such Document from which the alleged privileged portion has been redacted, describing the redacted portion and basis for the redaction.

REQUESTS FOR INFORMATION AND DOCUMENTS

In accordance with the requirements set forth in the “Definitions” and “Instructions,” You are specifically required to respond to the following within the time frame set forth above:

A. Identification of Responder

1. Identify the Person(s) or individual(s) answering and/or assisting in answering this Request on Your behalf.
2. If other than the above, Identify the Person(s) or individual(s) with the authority to, and best ability to answer questions Relating To the subject matter of this Request.

B. Company Information

1. Identify All physical addresses, post office boxes, telephone numbers, web addresses, and email addresses for All locations from which Respondent conducts business and indicate which of these are used to conduct business in or from Connecticut.
2. Produce all Documents (such as an organizational chart) sufficient to Identify:
 - a. The Respondent’s form of organization;
 - b. All corporations, LLCs and other Entities affiliated with the Respondent;
 - c. All Persons and Entities with an ownership interest in the Respondent (including a description of the nature and extent of such ownership interest); and
 - d. All officers, directors, or managing members of the Respondent.
3. Identify All employees, contractors, agents or Any other Persons responsible for the maintenance and/or repairs Relating to the Concierge Apartments, including the Person who has overall authority over the maintenance and/or repair of the Concierge Apartments.
4. Provide exemplars of Your leasing agreements for Concierge Apartments.
5. Provide exemplars of all print and electronic marketing or advertising materials for Concierge Apartments.

C. Business Practices

1. Identify All inspections performed by the Town of Rocky Hill Relating to the Concierge Apartments and Produce All Documents Relating to such inspections.
2. Identify All violations of local building and fire codes Relating to Concierge Apartments and Identify all Tenant complaints submitted to Fair Rent Commissions, and produce All Documents Relating to such violations and complaints.

3. Identify all fines or other sanctions or penalties assessed against the Respondent Relating to the inspections, violations, and complaints identified in response to Requests C(1) and C(2), above.
4. Identify All actions you took to address the violations and complaints Identified in Request C(2) above. In your response, Identify All Persons who performed these actions.
5. Identify All evacuation orders issued by the Town of Rocky Hill relating to Concierge Apartments and produce All such orders and All Documents Relating to such orders.
6. Describe All actions You took Relating to the evacuation orders Identified in the previous request and Produce All Documents Relating to such actions, including without limitation, any Documents Relating to Your payment of lodging and other expenses for displaced Tenants, Any plans to prorate or otherwise excuse displaced Tenants' payment obligations or allow them to terminate their leases, and Any plans to reimburse Tenants for damage to their personal property. In your response, Identify All Persons who performed these actions.
7. For the twelve months immediately preceding this CID, Identify All Work Orders Relating to the Concierge Apartments and produce All such Work Orders, together with Any Documents Relating to such Work Orders.
8. For the twelve months immediately preceding this CID, Identify all Tenant complaints Relating to the condition, maintenance, or upkeep of Concierge Apartments.
9. Describe the Respondent's policies and procedures Relating to the handling of Tenant complaints and Identify all Documents pertaining to the same.
10. Identify All lawsuits filed against You Relating to the maintenance of the Concierge Apartments and produce All Documents Relating to such lawsuits.
11. Identify All lawsuits filed against You relating to the maintenance of Any residential properties You own in the United States.
12. Identify Any deaths that occurred at Concierge Apartments or the property where it is located since July 1, 2024, and further Identify the decedent, the date of the death and the Describe the circumstances of the death.
13. Identify All Tenants who have been displaced from Concierge Apartments due to Any maintenance issue since July 1, 2024, and further Identify the date(s) the Tenant was displaced; the location where the Tenant resided during the period in which they were displaced; and the amount You paid or reimbursed the Tenant for expenses relating to the displacement.
14. Identify how you intend to make repairs to units and buildings at Concierge Apartments that are subject to Any evacuation order.

15. Identify All Persons to whom You paid, or intend to pay, \$2,000,000 Relating to repairs at the Concierge Apartments since January 1, 2026, and provide a searchable spreadsheet Identifying All such Persons and the work they have been retained to perform.
16. Identify All insurance policies You maintain Relating to Concierge Apartments and produce All such policies.

HEREOF FAIL NOT UNDER PENALTY OF LAW.

Dated at Hartford, Connecticut, this 9th day of February, 2026.



BRYAN CAFFERELLI

COMMISSIONER OF CONSUMER PROTECTION

**STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION
INVESTIGATIVE DEMAND**

OATH

Personally appeared, _____, who, being duly sworn deposes and says that the answers to the Interrogatories and Document requests attached hereto and contained in the Investigative Demand issued to **J.R.K. Property Holdings and J.R.K. Residential Group** are accurate to the best of my knowledge and belief.

Name:

Title:

Subscribed and sworn to me this _____ day of _____, 2026.

Notary Public/ Commissioner of Superior Court