

Phone: 860 808-5450 Fax: 860 808-5591

October 19, 2023

Supervising Assistant State's Attorney Superior Court – GA #14 101 Lafayette Street Hartford, CT 06106

RE: State v. William A. Ferrigno - D.O.B. - 2/25/1952 - G.A. #14

Dear Supervising Assistant State's Attorney:

Enclosed please find a signed Information and Arrest Warrant Application charging William A. Ferrigno with a violation of the Home Improvement Contractor Act in G.A. #14. Please present to the judge for signature and note that the statute of limitations will expire on 4/1/2024.

Once the Information and Arrest Warrant Application is signed by a judge, please return to me a copy of all pages (including the back page with the judge's signature) for our file.

Attached is a letter for the police department. Once the Warrant is signed, please provide us the courtesy of sending the documentation to the appropriate police department, with the attached letter.

Thank you.

Very truly yours,

Matthew B. Beizer

Assistant Attorney General

MBB:lh

Enclosures

cc: Kevin Lawlor, Chief States Attorneys Office

165 Capitol Avenue Hartford, Connecticut 06106



Phone: 860 808-5450 Fax: 860 808-5587

October 19, 2023

RE: State v. William A. Ferrigno (D/O/B - 2/25/1952); G.A. #14

NOTICE TO POLICE DEPARTMENT

This case is being prosecuted by the Office of the Attorney General. Please send Paralegal Specialist Linda Hawes an email at <u>Linda.Hawes@ct.gov</u> when you receive this warrant so that we may update our file.

The Office of the Attorney General would appreciate <u>your prompt effort in serving this</u> <u>warrant in a timely fashion</u>. The last known phone # for William A. Ferrigno that we have on file is (860) 667-7040.

Please also email Paralegal Specialist Linda Hawes at Linda.Hawes@ct.gov or call Linda Hawes at (860) 808-5407 when the defendant is arrested to advise this office of the court date.

Thank you.

INFORMATION

STATE OF CONNECTICUT SUPERIOR COURT

Disposition	date
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JD-CR-71 Rev 3-11

Police Case number

Agency name

Office of the Attorney General

Agency number

HC2307387

Title, Al	legatio	n and	Cour	ıts											
State of Conr	necticut vs (Name of acc	cused)						(Town) of	accused	Docke	et numb	ег		
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INFORMATIO	N	STATE OF CO	ONNECTICUT			D	Disposition date
JD-CR-71 Rev 3-11		SUPERIO					
Police Case number		Agency name Office of the Attorney	y General				gency number IC2307387
Arrest Warra	ant						
Geographical area 14 number	State of Connecticu	t vs. Ferrigno, Willia	m, A.				
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☐ A Acc	used is ordered to be l	orought before a clerk o	r assistant clerk	of the S	uperior Court	:	
☐ B. Acc	used is not entitled to	oail.					
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By the Court	Signed (Judge of the Superior (count)	Date	Name o	f Judge (Print or ty	μ e)	
Return On A	Arrest Warrant						
Geographical area number	Town of				Date		State of Connecticut
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Date		Other Court	action				Judge
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JD-CR-64b Rev 3-11 C G S § 54-2a Pr Rk Sec 36-1 36-2 36

STATE OF CONNECTICUT SUPERIOR COURT

For Court Use Only							
Supporting Affidavits sealed							
Yes	☐ No						

C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3	8	www.jud ct gov				☐ No	
Police Case number	Agency name				Agency nu	ımber	
	Office of the Attor	ney General			HC2307387		
Name (Last, First, Middle Initial)		Residence (Town) of	accused	Court to be hel	d at (Town)	Geographical	
Ferrigno, William, A.		Weatogue		Hartford		Area number	14
Application For Arrest Warr To A Judge of the Superior Court The undersigned hereby applies for set forth in the Affidavit Below	r a warrant for the arres		med accused	d on the ba	sıs of the	facts	
	secuting authority)		Type/print name of M A TT			ZER, A	12
Affidavit The undersigned affiant, being duly	v sworn, deposes and s	ays				1	
I, Brian Ferguson of Hartford, C	Connecticut state that	:					

- 1. At all times relevant hereto, I have been employed as a Special Investigator for the Department of Consumer Protection.
- 2. As part of my investigation, I have reviewed a signed written complaint and subsequent documents submitted to this department by Eric Dunnack of 128 West Street in Columbia Connecticut. I also interviewed Eric Dunnack on 3/31/2023 at the single-family residence at the above address. Mr. Dunnack stated that he and his wife were looking forward to moving from Columbia to Avon to build a single-family home.
- 3. According to the information supplied by Eric Dunnack in his complaint and during my interview with him, William Ferrigno individually and/or d/b/a Sunlight Construction Inc. offered on 3/21/2022 via computer to build them a new home at 94 Windsor Court in Avon Connecticut. Specifically, he offered to construct a residential dwelling and improvements on property that client is under contract to purchase, pursuant to the Land Only Purchase and Sale Agreement known as 94 Windsor Court in Avon Connecticut with house plans, site plans, asbuilt foundation plans, and all permits by builder. This included sitework, foundation, flatwork, concrete stoop, framing, roofing, windows, exterior doors, siding & exterior trim, exterior painting, heating, ventilation and air conditioning, electrical, plumbing, insulation, Gypsum wallboard, stairs, flooring, fireplace, kitchen cabinets, vanities and counter tops, appliances, interior mill work, door hardware, bath accessories, closet shelving, mirrors & shower doors, interior painting, basement, garage, landscaping, patio, driveway, and cleaning. The contract provided a start date of 9/15/2022. No NHC # was written in contract.

(This ıs pa	age 1 of a 5 page Affidavıt)		NO. THIN
Date	10/19/2023	Signed (Afflant)	- CCMMISSION EXPIRES E
Jurat	Subscribed and sworn to before me on (Date)	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	1/30/23 GE
Findin	ıg	O'	W W WHITH

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and	Signed at <i>(City or town)</i>	On (Date)	Signed (Judge/Judge Trial Referee)	Name of Judge/Judge Trial Referee
Signature				

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

- Mr. Dunnack and his wife (Areta Shum) stated that William Ferrigno offered a second contract on 03/21/2022 for the purposes of a land only purchase and sale agreement. They stated that William Ferrigno offered the land only known as 94 Windsor Court, Avon County of Hartford and State of Connecticut, being an approved building lot within the Town of Avon and being located within an approved subdivision for the total purchase price of \$230,000.00. Mr. Dunnack and his wife stated that they both docu-signed the contract along with William Ferrigno on 03/21/2022.
- 4. Mr. Dunnack stated that his Attorney recommended that the deposit of (\$160,000.00) should be placed in escrow and they stated that William Ferrigno got "annoyed" and wanted a check so they wouldn't "lose" the home. Mr. Dunnack and his wife agreed to such a large deposit/ down payment (\$160,000.00).
- 5. Eric Dunnack provided me with a copy of the following canceled check which he gave to William Ferrigno for the contracted work:
- Check No. 143 drawn on Amalgamated Bank dated 3/21/2022 and payable to Sunlight Construction Incorporated in the amount of \$160,000 and signed by Eric Dunnack. The front of the check bears the notation "Deposit 94 Windsor Court Avon, CT".
- 6. Eric Dunnack and his wife reported that William Ferrigno never provided professional construction drawings and a construction schedule. They stated the construction drawings that were provided in the contract were a rough draft and inaccurate, so they met with William Ferrigno on 11/23/2022 to retrieve correct construction drawings and a construction schedule and William Ferrigno never provided them with the drawings nor schedule. Eric Dunnack and his wife stated to date, they have not received any correspondence for such documents from William Ferrigno. The complainants provided me with an email correspondence between their realtor, themselves, and William Ferrigno asking numerous times for updates regarding the new home. Since the work did not start within 30 days of the date of the contract, Eric Dunnack and Areta Shum requested, in writing, a refund of their \$160,000 deposit and for \$15,000 they paid for the appliances.
- 7. Eric Dunnack and Areta Shum have provided me with a copy of a certified letter, dated 3/17/2023 addressed to William A. Ferrigno at his last known address, requesting a refund in the amount of \$175,000. The money was not refunded.
- 8. On 03/27/2023 I spoke with Rich McKinnon, the Avon Building Official regarding building permits for 94 Windsor Court, Avon. He stated that no building permits were ever applied for this location. I searched the Avon Building Department database and confirmed that there was no building permit applied for.

(This is pa	age 2 of a 5 page Affidavit)			MY O E
Date	10/19/2023		Signed (Affiant)	YFIRES :5 = 15 = 13 = 13 = 13 = 13 = 13 = 13 = 1
Jurat	Subscribed and sworn to before me o	n <i>(Dat</i> e)	Signed (Judge/Glerk, Commissioner of Superior Court, Notary Public)	CONVECTOR
Reviewed (Prosecutorial Official)	Date 19-19-23	Reviewed (Judge/Judge\Trial Referee)	Date

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

- 9. On 3/27/2023, I carefully examined the files of the e-licensing records of the Department of Consumer Protection on William Ferrigno individually and/or Sunlight Construction Inc. From these files I determined that William Ferrigno held NHC registration 0000076 from 10/01/1999 consecutively to 09/30/2023. The owners listed with DCP licensing are Brett R Lefevre and William Ferrigno. I also found that William Ferrigno also holds HIC registration number 601454 from 08/09/2004 to 11/30/2004 and from 12/01/2004 consecutively to 03/31/2023. I also determined that William Ferrigno held NHC registration 0016902 under Sunlight Ramstein LLC from 09/12/2022 to 03/31/2023 and is currently active in renewal. The owners listed with DCP licensing are Brett R Lefevre and the respondent.
- 10. On 03/27/2023 I reviewed the Secretary of the State's on-line database for Sunlight Construction Inc and found that they filed their corporation on 02/22/1977. William Ferrigno is listed as one of the principal members along with Brett Lefevre. I also found Sunlight Ramstein LLC and William Ferrigno filed his corporation paperwork on 12/14/2007. William Ferrigno is listed as one of the principal members along with Brett Lefevre.
- 11. On 3/15/2023, DCP sent a letter to William Ferrigno asking him for his position regarding the complaint and for any documents supporting his position. As of the signing of this affidavit, I have not received a response from him regarding this letter. On 3/28/2023, I spoke to William Ferrigno by phone, and he stated that he would refund the complainants their deposit. On 3/29/2023, he sent me an email acknowledging that he would refund the complainant their deposit.
- 12. On 3/16/2023, I determined from information received from the CTIC Report that William A. Ferrigno holds CT license #142240315, his date of birth is 2/25/1952 and his last known address is 304 Highcroft Place, Weatogue, CT 06089. His last known business address is 166 West Main Street, Avon, CT 06001. William A. Ferrigno is described as a white male, 5'11", with gray hair and brown eyes.
- 13. The complaint falls within the parameters of the New Home Construction Contractors Act, C.G.S. §20-417j, inclusive.
- 14. "Contract" is defined in C.G.S. §20-417a (3) as:
- "...any agreement between a new home construction contractor and a consumer for the construction or sale of a new home or any portion of a new home prior to occupancy."
- 15. "Engage in the business" is defined in C.G.S. §20-417a (4) as:

"…that	VX 1 H14'0		
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(This is pa	ge 3 of a 5 page Affidavit)		COMMISSION
Date /	10/19/2023	Signed (Affiant)	LAPIRES 5
Jurat	Subscribed and sworn to before pre on (Date)	Signed (Judge/Clerk, Commissioner of Superior Gourt, Notary Public)	O. C. WELL
Reviewed (Proseculorial Official) Date	Reviewed (Judge/Judge Trial Referee)	Date

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

Affidavit - Continued

- 16. "New Home Construction Contractor" is defined in C.G.S. §20-417a (5) as:
- "...any person who contracts with a consumer to construct or sell a new home or any portion of a new home prior to occupancy."
- 17. "Person" is defined in C.G.S. §20-417a (7) as:
- "...one or more individuals, partnerships, association, corporations, limited liability companies, business trusts, legal representatives or any organized group of persons."
- 18. "Consumer" is defined in C.G.S. §20-417a (8) as:
- "...the buyer or prospective buyer...of any new home or the owner of property on which a new home is being or will be constructed regardless of whether such owner obtains a building permit as the owner of the premises affective pursuant to section.29-263."
- 19. Sec. 20-417d(d) No person shall: (7) fail to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address, if (A) the consumer has complied with the terms of the written contract up to the time of the request, (B) no substantial portion of the contracted work has been performed at the time of the request, (C) more than thirty days has elapsed since the starting date specified in the written contract or more than thirty days has elapsed since the date of the contract if such contract does not specify a starting date, and (D) the new home construction contractor has failed to provide a reasonable explanation to the consumer concerning such contractor's failure to perform a substantial portion of the contracted work. For purposes of this subdivision, "substantial portion of the contracted work" includes, but is not limited to, work performed by the new home construction contractor to (i) secure permits and approvals, (ii) redraft plans or obtain engineer, architect, surveyor or other approvals for changes requested by the consumer or made necessary by site conditions discovered after the contract is executed, (iii) schedule site work or arrange for other contractors to perform services related to the construction of the consumer's new home, and (iv) do any other work referred to in the contract as a "substantial portion of the contracted work".
- 20. C.G.S. §20-417e provides that "In addition to any other remedy provided for in sections 20-417a to 20-417j, inclusive, and subsection (b) of section 20-241, any person who violates any provision of subsection (d) of section 20-417d,...shall be guilty of a class A misdemeanor."

(This ıs pa	ge 4 of a 5 page Affidavit)			MI COMMISSION S
Date			Signed (Afflant)	W. EYPIP'S . M.
	10/14/2023		/ December 1	7: 1/20/13:03
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Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
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JD-CR-64a Rev 3-11 CGS § 54-2a Pr Bk Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

Affidavit - Continued

- 21. C.G.S. §53a-11 provides that "A person shall be criminally liable for conduct constituting an offense which such person performs or causes to be performed in the name of or on behalf of a corporation or limited liability company to the same extent as if such conduct were performed in such person's own name or behalf."
- 22. I therefore request a warrant be issued for the arrest of William A. Ferrigno date of birth 2/25/1952, 1 (one) count of failing to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address under C.G.S. §20-417d(d)(7).

(This is page 5 of a 5 page Affidavit.)

Date

| Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Signed (Affiant) | Si



Phone: 860 808-5450 Fax: 860 808-5591

October 19, 2023

Supervising Assistant State's Attorney Superior Court – GA #14 101 Lafayette Street Hartford, CT 06106

RE: State v. William A. Ferrigno – D.O.B. – 2/25/1952 - G.A. #14

Dear Supervising Assistant State's Attorney:

Enclosed please find a signed Information and Arrest Warrant Application charging William A. Ferrigno with a violation of the Home Improvement Contractor Act in G.A. #14. Please present to the judge for signature and note that the statute of limitations will expire on 8/13/2024.

Once the Information and Arrest Warrant Application is signed by a judge, please return to me a copy of all pages (including the back page with the judge's signature) for our file.

Attached is a letter for the police department. Once the Warrant is signed, please provide us the courtesy of sending the documentation to the appropriate police department, with the attached letter.

Thank you.

Very truly yours,

Matthew B. Beizer

Assistant Attorney General

MBB:lh

Enclosures

cc: Kevin Lawlor, Chief States Attorneys Office

165 Capitol Avenue Hartford, Connecticut 06106



Phone: 860 808-5450 Fax: 860 808-5587

October 19, 2023

RE: State v. William A. Ferrigno (D/O/B - 2/25/1952); G.A. #14

NOTICE TO POLICE DEPARTMENT

This case is being prosecuted by the Office of the Attorney General. Please send Paralegal Specialist Linda Hawes an email at <u>Linda.Hawes@ct.gov</u> when you receive this warrant so that we may update our file.

The Office of the Attorney General would appreciate <u>your prompt effort in serving this</u> <u>warrant in a timely fashion</u>. The last known phone # for William A. Ferrigno that we have on file is (860) 667-7040.

<u>Please also email Paralegal Specialist Linda Hawes at Linda.Hawes@ct.gov or call Linda Hawes at (860) 808-5407 when the defendant is arrested to advise this office of the court date.</u>

Thank you.

INFORMATION

STATE OF CONNECTICUT SUPERIOR COURT

JD-CR-71 Rev 3-11

Police Case number

Agency name

Office of the Attorney General

Agency number

HC2311724

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At (Town)		On or ab							General S	tatute number					
Avon		8/31/2	2023			C	:.G.	S. §2	20-417d	(d)(7)				1	
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Disposition date STATE OF CONNECTICUT INFORMATION SUPERIOR COURT JD-CR-71 Rev 3-11 Agency name Agency number Police Case number Office of the Attorney General HC2311724 Arrest Warrant Geographical State of Connecticut vs. Ferrigno, William, A. number To Any Proper Officer of the State of Connecticut By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply) A Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court B. Accused is not entitled to bail If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be Extradition boundaries established by prosecutor C. Bail set at D Non-financial conditions of release E. Conditions of release not determined by court Signed (Judge of the Superior Court) Date Name of Judge (Print or type) By the Court Return On Arrest Warrant Town of Geographical Date State of Connecticut area number Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused, and have said accused here in court for examination. Attest (Officer's signature and Department) Other Court action Date Judge

ID_CR_64h Rev 3-11

STATE OF CONNECTICUT

For Court Use Only					
Supporting Affidavits sealed					
Yes	No				

C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3	SU	SUPERIOR COURT www.jud ct gov			Yes No	
Police Case number	Agency name			Agency nu	ımber	
	Office of the Attorne	ey General		HC231	1724	
Name (Last, First, Middle Initial)		Residence (Town) of accused	Court to be held	at (Town)	Geographical	
Ferrigno, William, A.		Weatogue	Hartford		Area number 1	4
Application For Arrest Warr To. A Judge of the Superior Court The undersigned hereby applies for		of the above-named ac	cused on the ba	sis of the	e facts	
set forth in the Affidavit Below						
Date 10 . 19 . 23 Signed (Pros	ecuting authority)	• • •	name of prosecuting a	uthority Z	FILER!	116
Affidavit)					
The undersigned affiant, being duly	sworn, deposes and say	/s				
I, Brian Ferguson of Hartford, C	onnecticut state that:					

1. At all times relevant hereto, I have been employed as a Special Investigator for the Department of Consumer Protection.

2. As part of my investigation, I have reviewed a signed, written complaint and subsequent documents submitted to this department by Venkata Nagisetti of 58 Fox Hollow Road in Avon, Connecticut. I also interviewed Venkata Nagisetti on 8/1/2023 at his single-family home at the address listed above. Mr. Nagisetti stated he was looking to move from his current home to a larger home for his family.

3. According to the information supplied by Venkata Nagisetti in his complaint and during my interview with him, William Ferrigno individually and/or d/b/a Sunlight Construction Inc. offered a written contact on 4/1/2022 via email to build them a new home at 99 Lofgren Road in Avon Connecticut. Specifically, he offered to construct a residential dwelling and improvements on property that client is under contract to purchase, pursuant to the Land Only Purchase and Sale Agreement known as 99 Lofgren Road in Avon Connecticut with house plans, site plans, as-built foundation plans, and all permits by builder. This included sitework, foundation, flatwork, concrete stoop, framing, roofing, windows, exterior doors, siding & exterior trim, exterior painting. heating, ventilation and air conditioning, electrical, plumbing, insulation, Gypsum wallboard, stairs, flooring, fireplace, kitchen cabinets, vanities and counter tops, appliances, interior mill work, door hardware, bath accessories, closet shelving, mirrors & shower doors, interior painting, basement, garage, landscaping, patio, driveway, and cleaning. The total price for the contracted work was \$640,000 and the offer was accepted by Venkata Nagisetti and his wife (Bhavani Veeramachaneni) when they signed the written contract on 4/1/2022 and sent it back via email to William Ferrigno. No NHC # was written in contract.

(This is pa	nge 1 of a 5 page Affidavit.)		AN RY PUBLIS .
Date	0/19/2023	Signed (Affiant)	CCLUISTION 5
Jurat	Subscribed and swom to before me on (Date)	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	A CONTROLL
Findin	g	\bigcup	A work

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and	Signed at (City or town)	On (Date)	Signed (Judge/Judge Trial Referee)	Name of Judge/Judge Trial Referee
Signature				

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk, Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

Affidavit - Continued

Venkata Nagisetti stated that William Ferrigno offered a second contract on 4/1/2022 for the purposes of a land only purchase and sale agreement. He also stated that William Ferrigno offered the land only known as Parcel 303099 (99 Lofgren Road) in the Town of Avon, County of Hartford and State of Connecticut, being an approved building lot within the Town of Avon and being located within an approved subdivision for the total purchase price of \$180,000. Mr. Nagisetti stated that he and his wife signed the written contract on 4/1/2022 and sent it back via email to William Ferrigno.

- 5. Venkata Nagisetti provided me with a copy of the following canceled check which he gave to William Ferrigno for the contracted work:
- Check No. 174 drawn on Bank of America dated 4/8/2022 and payable to Sunlight Construction Inc. in the amount of \$40,000 and signed by V. Bhavani. The front of the check bears the notation "99 Lofgren deposit 04/08/22".
- 6. Venkata Nagisetti reported that William Ferrigno and his realtor stated to him that Toll Brothers Construction currently owned the property and had an agreement with William Ferrigno to sell him the property when the time comes. I was provided with emails with correspondence between Venkata Nagisetti, his realtor and William Ferrigno dating back to 01/24/2023. William Ferrigno stated in the email that Toll Brothers Construction was sending him paperwork confirming that the lot was "ours" and will be closing on it soon. This appeared to be false, and William Ferrigno never owned or had an agreement with Toll Brothers Construction to own that property. Mr. Nagisetti stated that to date, 99 Lofgren Rd is under contract by Toll Brothers Construction with another homeowner. Mr. Nagisetti stated that William Ferrigno never provided professional construction drawings and a construction schedule and that to date, he has not received any correspondence for such documents from William Ferrigno. On 04/04/2023, Mr. Nagisetti emailed William Ferrigno requesting to terminate the contract with a full refund of his deposit. On 04/09/2023, William Ferrigno replied to Mr. Nagisetti's email stating that he will refund his deposit as quickly as possible. To date, William Ferrigno has failed to return Mr. Nagisetti's deposit.
- 7. Venkata Nagisetti provided me with a copy of the demand letter his attorney sent via email and Federal Express, dated 8/2/2023 addressed to William A. Ferrigno at his last known address, requesting a full return of Vankata Nagisetti and Bhavana Veeramachaneni's deposit. The money was not refunded.
- 8. On 08/02/2023, I spoke with Chris Szylobryt, the Town of Avon Building Official regarding building permits for 99 Lofgren Rd, Avon. He stated that no building permits were ever applied for this location and stated that Toll Brothers Construction currently owns the property.

(This is p	age 2 of a 5 page Affidavit.)			# 1 CO 115 100
Date	10/19/2023		Signed (Affiant)	PIRIS A
Jurat	Súbscribéd and sworn to before me or	n (Date)	Signed (Judge/Glerk Commissioner of Superior Court, Notary Public)	CO INECTA
Reviewed	(Prosecutorial Official)	Date 1. K-23	Reviewed (Judgè/Judge Trial Referee)	Date

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

- 9. On 3/27/2023, I carefully examined the files of the e-licensing records of the Department of Consumer Protection on William Ferrigno individually and/or Sunlight Construction Inc. From these files I determined that William Ferrigno held NHC registration 0000076 from 10/01/1999 consecutively to 09/30/2023. The owners listed with DCP licensing are Brett R Lefevre and William Ferrigno. I also found that William Ferrigno also holds HIC registration number 601454 from 08/09/2004 to 11/30/2004 and from 12/01/2004 consecutively to 03/31/2023. I also determined that William Ferrigno held NHC registration 0016902 under Sunlight Ramstein LLC from 09/12/2022 to 03/31/2023 and is currently active in renewal. The owners listed with DCP licensing are Brett R Lefevre and the respondent.
- 10. On 03/27/2023 I reviewed the Secretary of the State's on-line database for Sunlight Construction Inc and found that they filed their corporation on 02/22/1977. William Ferrigno is listed as one of the principal members along with Brett Lefevre. I also found Sunlight Ramstein LLC and William Ferrigno filed his corporation paperwork on 12/14/2007. William Ferrigno is listed as one of the principal members along with Brett Lefevre.
- 11. On 7/5/2023, DCP sent a letter to William Ferrigno asking him for his position regarding the complaint and for any documents supporting his position. As of the signing of this affidavit, I have not received a response from him regarding this letter.
- 12. On 3/16/2023, I determined from information received from the CTIC Report that William A. Ferrigno holds CT license #142240315, his date of birth is 2/25/1952 and his last known address is 304 Highcroft Place, Weatogue, CT 06089. His last known business address is 166 West Main Street, Avon, CT 06001. William A. Ferrigno is described as a white male, 5'11", with gray hair and brown eyes.
- 13. The complaint falls within the parameters of the New Home Construction Contractors Act, C.G.S. §20-417j, inclusive.
- 14. "Contract" is defined in C.G.S. §20-417a (3) as:
- "...any agreement between a new home construction contractor and a consumer for the construction or sale of a new home or any portion of a new home prior to occupancy."
- 15. "Engage in the business" is defined in C.G.S. §20-417a (4) as:
- "...that the person engages in the business for the purpose of compensation or profit."

(This is p	page 3 of a 5 page Affidavit)		ST RY FUE TO
Date	10/19/2023	Signed (Affiant)	. COMMISSION
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Jurat	Subscribed and sworn to before me on (Date)	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	ं गाउपाउँ 🔾 इ
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JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk, Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

Affidavit - Continued

- 16. "New Home Construction Contractor" is defined in C.G.S. §20-417a (5) as:
- "...any person who contracts with a consumer to construct or sell a new home or any portion of a new home prior to occupancy."
- 17. "Person" is defined in C.G.S. §20-417a (7) as:
- "...one or more individuals, partnerships, association, corporations, limited liability companies, business trusts, legal representatives or any organized group of persons."
- 18. "Consumer" is defined in C.G.S. §20-417a (8) as:
- "...the buyer or prospective buyer...of any new home or the owner of property on which a new home is being or will be constructed regardless of whether such owner obtains a building permit as the owner of the premises affective pursuant to section.29-263."
- 19. Sec. 20-417d(d) No person shall: (7) fail to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address, if (A) the consumer has complied with the terms of the written contract up to the time of the request, (B) no substantial portion of the contracted work has been performed at the time of the request, (C) more than thirty days has elapsed since the starting date specified in the written contract or more than thirty days has elapsed since the date of the contract if such contract does not specify a starting date, and (D) the new home construction contractor has failed to provide a reasonable explanation to the consumer concerning such contractor's failure to perform a substantial portion of the contracted work. For purposes of this subdivision, "substantial portion of the contracted work" includes, but is not limited to, work performed by the new home construction contractor to (i) secure permits and approvals, (ii) redraft plans or obtain engineer, architect, surveyor or other approvals for changes requested by the consumer or made necessary by site conditions discovered after the contract is executed, (iii) schedule site work or arrange for other contractors to perform services related to the construction of the consumer's new home, and (iv) do any other work referred to in the contract as a "substantial portion of the contracted work".
- 20. C.G.S. §20-417e provides that "In addition to any other remedy provided for in sections 20-417a to 20-417j, inclusive, and subsection (b) of section 20-241, any person who violates any provision of subsection (d) of section 20-417d,...shall be guilty of a class A misdemeanor."

(This is pa	age 4 of a 5 page Affidavit)					MY PLO SO
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JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

www jud ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William, A.	Weatogue	Hartford	Area number	14

Affidavit - Continued

- 21. C.G.S. §53a-11 provides that "A person shall be criminally liable for conduct constituting an offense which such person performs or causes to be performed in the name of or on behalf of a corporation or limited liability company to the same extent as if such conduct were performed in such person's own name or behalf."
- 22. I therefore request a warrant be issued for the arrest of William A. Ferrigno date of birth 2/25/1952, 1 (one) count of failing to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address under C.G.S. §20-417d(d)(7).

(This is page 5 of a 5 page Affidavit)

Date

| O | 9 | 7023 | Signed (Affiant) | Signed (Affiant) | Signed (Judge/Clerk, Confirmissioner of Superior Court, Notary Public) | Signed (Judge/Clerk, Confirmissioner of Superior Court, Notary Public) | Confirmissioner of Superior Court, Notary Public) | Date | Reviewed (Prosecutorial Official) | Date | Da



Phone: 860 808-5450 Fax: 860 808-5591

October 19, 2023

Supervising Assistant State's Attorney Superior Court – GA #15 20 Franklin Square New Britain, CT 06051

RE: State v. William A. Ferrigno - D.O.B. - 2/25/1952 - G.A. #15

Dear Supervising Assistant State's Attorney:

Enclosed please find a signed Information and Arrest Warrant Application charging William A. Ferrigno with a violation of the Home Improvement Contractor Act in G.A. #15. Please present to the judge for signature and note that the statute of limitations will expire on 5/30/2024.

Once the Information and Arrest Warrant Application is signed by a judge, please return to me a copy of all pages (including the back page with the judge's signature) for our file.

Attached is a letter for the police department. Once the Warrant is signed, please provide us the courtesy of sending the documentation to the appropriate police department, with the attached letter.

Thank you.

Very truly yours,

Matthew B. Beizer

Assistant Attorney General

MBB:lh

Enclosures

cc: Kevin Lawlor, Chief States Attorneys Office

165 Capitol Avenue Hartford, Connecticut 06106



Phone: 860 808-5450 Fax: 860 808-5587

October 19, 2023

RE: State v. William A. Ferrigno (D/O/B - 2/25/1952); G.A. #15

NOTICE TO POLICE DEPARTMENT

This case is being prosecuted by the Office of the Attorney General. Please send Paralegal Specialist Linda Hawes an email at <u>Linda.Hawes@ct.gov</u> when you receive this warrant so that we may update our file.

The Office of the Attorney General would appreciate <u>your prompt effort in serving this</u> <u>warrant in a timely fashion</u>. The last known phone # for William A. Ferrigno that we have on file is (860) 667-7040.

<u>Please also email Paralegal Specialist Linda Hawes at Linda. Hawes@ct.gov or call Linda Hawes at (860) 808-5407 when the defendant is arrested to advise this office of the court date.</u>

Thank you.

INFORMATION

STATE OF CONNECTICUT

JD-CR-71 Rev 3-11	SUPERIOR COURT	
Police Case number	Agency name	Agency number
	Office of the Attorney General	HC2307763

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Prosecuto	r on ori	ginal disp	oosition		Reporter	r/mon	itor on origina	al dispos	sition	Signe	ed (Clerk)				Signed	(Judge)		

Disposition date STATE OF CONNECTICUT INFORMATION SUPERIOR COURT JD-CR-71 Rev 3-11 Agency number Agency name Police Case number Office of the Attorney General HC2307763 **Arrest Warrant** Geographical State of Connecticut vs. Ferrigno, William A. number To Any Proper Officer of the State of Connecticut By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply) A Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court. B Accused is not entitled to bail If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be Extradition boundaries established by prosecutor C. Bail set at D Non-financial conditions of release E. Conditions of release not determined by court Signed (Judge of the Superior Court) Name of Judge (Print or type) Date By the Court **Return On Arrest Warrant** Town of Date Geographical State of Connecticut area number Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused, and have said accused here in court for examination Attest (Officer's signature and Department) Other Court action Judge Date

JD-CR-64b Rev 3-11 C G S § 54-2a Pr Bk Sec. 36-1 36-2, 36-2

STATE OF CONNECTICUT

For Cour	t Use Only
Supporting A	ffidavits sealed
Yes	☐ No

Pr Bk Sec. 36-1 36-2, 36-3		www.jud.ct.gov		Yes	No	
Police Case number	Agency name	7. T.		Agency number		
	Office of the At	torney General		HC230	7763	
Name (Last, First, Middle Initial)		Residence (Town) of acc	cused Court to be held	d at (Town)	Geographical	
Ferrigno, William A.		Weatogue	New Britai	in	Area number 15	
Application For Arrest W To A Judge of the Superior Co The undersigned hereby applie set forth in the ☐ Affidavit Be	urt s for a warrant for the a	rrest of the above-name i) Attached	ed accused on the ba	sıs of the	e facts	
Date 10-19-23 Signed	(Prosecuting authority)	Тур	pe/print name of prosecuting a	iuthority BEI	ZER!	AN G
Affidavit		,				
The undersigned affiant, being	duly sworn, deposes an	d says				

- I, Brian Ferguson of Hartford, Connecticut state that:
- 1. At all times relevant hereto, I have been employed as a Special Investigator for the Department of Consumer Protection.
- 2. As part of my investigation, I have reviewed a signed, written complaint and subsequent documents submitted to this department by Andrew Van Helsing of 932 Hopmeadow Street, Apt. 868, Simsbury, CT 06070. I also interviewed Andrew Van Helsing on 5/26/2023 at 110 Albany Turnpike, Canton, CT. He stated he was looking to move from Simsbury to Burlington to build a single-family home.
- 3. According to the information supplied by Andrew Van Helsing in his complaint and during my interview with him, William Ferrigno individually and/or d/b/a Sunlight Construction Inc. offered on 7/11/2022 via computer to build them a new home at 8 Highwood Crossing in Burlington Connecticut. Specifically, he offered to construct a residential dwelling and improvements on property that client is under contract to purchase, pursuant to the Land Only Purchase and Sale Agreement know as 8 Highwood Crossing in Burlington Connecticut with plans & permits, sitework, foundation, flatwork, concrete porches and stoops, framing, roofing, windows, exterior doors, siding, exterior painting, heating, ventilation and air conditioning, electrical, plumbing for bathrooms, kitchen, and laundry room, insulation, gypsum wallboard, stairs, flooring, fireplace, kitchen cabinets, vanities and counter tops, appliance allowance (\$4,500), interior mill work, door hardware, bath accessories, closet shelving, mirrors & shower doors, interior painting, basement, garage, landscaping, patio/deck, driveway, and cleaning. The total price for the contracted work was \$555,030 and the offer was accepted by Andrew Van Helsing on 7/11/2022 at the residence. No NHC # was written in contract.

(This is p	age 1 of a 4 page Affidavit)		OF THIWKING
Date	10/19/2023	Signed (Affiant)	- CCMMISSION
Jurat	Subscribed and sworn to before me on (Date)	Signed (Judge/Glerk, Commissioner of Superior Court, Notary Public,	, 130px/c/
Findir	ng		COMMINIO

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

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Date and	Signed at (City or town)	On (Date)	Signed (Judge/Judge Trial Referee)	Name of Judge/Judge Trial Referee
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JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec. 36-1, 36-2 36-3

STATE OF CONNECTICUT SUPERIOR COURT

www jud ct gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
Ferrigno, William A.	Weatogue	New Britain	Area number	15

- Mr. Van Helsing stated that William Ferrigno offered a second contract on 07/11/2022 for the purposes of a land only purchase and sale agreement. Mr. Van Helsing also stated that William Ferrigno offered the land only known as 8 Highwood Crossing, Burlington, County of Hartford and State of Connecticut, being an approved building lot within the Town of Burlington and being located within an approved subdivision for the total purchase price of \$180,000. Mr. Van Helsing stated that he along with William Ferrigno signed the written contract on 07/11/2022.
- 4. Andrew Van Helsing provided William Ferrigno with a wire transfer from his Bank of America Savings account dated 07/12/2022 for \$180,000.
- 5. Andrew Van Helsing reported that William Ferrigno never provided professional construction drawings and construction schedule. Mr. Van Helsing also stated that to date, he has not received any correspondence for such documents from William Ferrigno. Andrew Van Helsing provided me with email correspondence and text messages with William Ferrigno asking numerous times for updates regarding the new home.

 Since the work did not start within 30 days of the date of the contract, Andrew Van Helsing had his attorney request, in writing, a refund of the deposit.
- 6. Andrew Van Helsing has provided me with a copy of the certified letter, dated 5/19/2023 and received on 5/19/2023 addressed to William Ferrigno at his last known address, requesting a refund in the amount of \$180,000. The money was not refunded.
- 7. On 3/27/2023, I carefully examined the files of the e-licensing records of the Department of Consumer Protection on William Ferrigno individually and/or Sunlight Construction Inc. From these files I determined that William Ferrigno held NHC registration 0000076 from 10/01/1999 consecutively to 09/30/2023. The owners listed with DCP licensing are Brett R Lefevre and William Ferrigno. I also found that William Ferrigno also holds HIC registration number 601454 from 08/09/2004 to 11/30/2004 and from 12/01/2004 consecutively to 03/31/2023. I also determined that William Ferrigno held NHC registration 0016902 under Sunlight Ramstein LLC from 09/12/2022 to 03/31/2023 and is currently active in renewal. The owners listed with DCP licensing are Brett R Lefevre and the respondent.
- 8. On 03/27/2023 I reviewed the Secretary of the State's on-line database for Sunlight Construction Inc and found that they filed their corporation on 02/22/1977. William Ferrigno is listed as one of the principal members along with Brett Lefevre. I also found Sunlight Ramstein LLC and William Ferrigno filed his corporation paperwork on 12/14/2007. William Ferrigno is listed as one of the principal members along with Brett Lefevre.

(This is į	page 2 of a 4 page Affidavit)			TO PURE E
Date	12/19/2023		Signed (Affiant)	COMM SSION
Jurat	Subscribed and sworn to before me o	n (Date)	Signed (Judge/Glerk, Commissioner of Superior Court, Notary Pul	OF COMMECUIA
Reviewed	(Prosecutorial Official).	Date 10.19 23	Reviewed (Judge/Judge Trjal Referee)	Date _{1/11/11/11}

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk, Sec. 36-1, 36-2, 36-3

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- 9. On 5/16/2023, DCP sent a letter to William Ferrigno asking him for his position regarding the complaint and for any documents supporting his position. As of the signing of this affidavit, I have not received a response from him as to the letter. On 3/28/2023, I spoke with William Ferrigno and he stated that he would refund the deposit; however, he did not have a timeline.
- 10. On 3/16/2023, I determined from information received from the CTIC Report that William A. Ferrigno holds CT license #142240315, his date of birth is 2/25/1952 and his last known address is 304 Highcroft Place, Weatogue, CT 06089. His last known business address is 166 West Main Street, Avon, CT 06001. William A. Ferrigno is described as a white male, 5'11", with gray hair and brown eyes.
- 11. The complaint falls within the parameters of the New Home Construction Contractors Act, C.G.S. §20-417j, inclusive.
- 12. "Contract" is defined in C.G.S. §20-417a (3) as:
- "...any agreement between a new home construction contractor and a consumer for the construction or sale of a new home or any portion of a new home prior to occupancy."
- 13. "Engage in the business" is defined in C.G.S. §20-417a (4) as:
- "...that the person engages in the business for the purpose of compensation or profit."
- 14. "New Home Construction Contractor" is defined in C.G.S. §20-417a (5) as:
- "...any person who contracts with a consumer to construct or sell a new home or any portion of a new home prior to occupancy."
- 15. "Person" is defined in C.G.S. §20-417a (7) as:
- "...one or more individuals, partnerships, association, corporations, limited liability companies, business trusts, legal representatives or any organized group of persons."
- 16. "Consumer" is defined in C.G.S. §20-417a (8) as:

(This is pa	ge 3 of a 4 page Affidavit)			COMPRESSION -
Date			Signed (Affiant)	EXPIRES . 1- 5
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	/ Subscribed and sworn to before me o	n (Date)	Signed (Judge/Glefk, Commissioner of Superior Court, Notary Public)	
Jurat	10/19/23	3	Tily T Hours	COMME
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
-		10-1925	<u> </u>	

JD-CR-64a Rev 3-11 C G S § 54-2a Pr Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT SUPERIOR COURT

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical	
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- 17. Sec. 20-417d(d) No person shall: (7) fail to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address, if (A) the consumer has complied with the terms of the written contract up to the time of the request, (B) no substantial portion of the contracted work has been performed at the time of the request, (C) more than thirty days has elapsed since the starting date specified in the written contract or more than thirty days has elapsed since the date of the contract if such contract does not specify a starting date, and (D) the new home construction contractor has failed to provide a reasonable explanation to the consumer concerning such contractor's failure to perform a substantial portion of the contracted work. For purposes of this subdivision, "substantial portion of the contracted work" includes, but is not limited to, work performed by the new home construction contractor to (i) secure permits and approvals, (ii) redraft plans or obtain engineer, architect, surveyor or other approvals for changes requested by the consumer or made necessary by site conditions discovered after the contract is executed, (iii) schedule site work or arrange for other contractors to perform services related to the construction of the consumer's new home, and (iv) do any other work referred to in the contract as a "substantial portion of the contracted work".
- 18. C.G.S. §20-417e provides that "In addition to any other remedy provided for in sections 20-417a to 20-417j, inclusive, and subsection (b) of section 20-241, any person who violates any provision of subsection (d) of section 20-417d,...shall be guilty of a class A misdemeanor."
- 19. C.G.S. §53a-11 provides that "A person shall be criminally liable for conduct constituting an offense which such person performs or causes to be performed in the name of or on behalf of a corporation or limited liability company to the same extent as if such conduct were performed in such person's own name or behalf."
- 20. I therefore request a warrant be issued for the arrest of William A. Ferrigno date of birth 2/25/1952, for 1 (one) count of failing to refund a deposit paid to a new home construction contractor not later than ten days after a written request mailed or delivered to the new home construction contractor's last-known address under C.G.S. §20-417d(d)(7).

(This is	page 4 of a 4 page Affidavit)		LIX Q
Date	10/19/2023	Signed (Afriant)	"A EXPIRES : L
Jurat	Subscribed and sworn to before me on (Date)	Signed (Judge/Clerk) Commissioner of Superior Court, Notary Public)	CONNECTION
Reviewe	d (Prosecutorial Official) Date	Reviewed (Judge/Judge Trial Referee)	Date ''/ mim