

EXHIBIT 76

1 STATE OF CONNECTICUT: SUPERIOR COURT
2 JUDICIAL DISTRICT OF STAMFORD/NORWALK
3 AT STAMFORD

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REDEVELOPMENT AGENCY OF :
6 THE CITY OF NORWALK; and :
CITY OF NORWALK, :
7 Plaintiff, :

: (X08) FST-CV18-6038249-S

8 vs. :
:

9 ILSR OWNERS LLC; :
WALL ST OPPORTUNITY FUND, LLC; :
10 KOMI VENTURES, LLC; :
MILLIGAN REAL ESTATE LLC; :
11 JASON MILLIGAN; and :
CC RIVINGTON LLC, :
12 Defendants. :

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Continued deposition of JASON MILLIGAN,
taken remotely pursuant to Notice, held at the Law
Offices of David Rubin, 600 Summer Street, Stamford,
Connecticut, before Samantha Howell, LSR 462 and
Notary Public in and for the State of Connecticut,
on December 29, 2020 at 9:50 a.m.

1 I've renovated several dozen, sometimes substantial
2 depending on the renovation, even if it's substantial.

3 Q Are you still talking about houses?

4 A I'm talking about anything.

5 Q Well, I think I heard you say I have renovated
6 several dozen. What were you referring to?

7 A All types of real estate.

8 Q Okay. What's the largest real estate development
9 project that you have built from out of the ground?

10 A Square feet?

11 Q Well, tell me what was the project that was the
12 largest one, yes, in square feet.

13 A That's probably one of the houses I built, which
14 was 5 or 6000 square feet.

15 Q Have any of your from out of the ground real
16 estate construction projects involve a mixed use
17 development with apartments and commercial uses?

18 A So when you say "out of the ground," what do you
19 mean?

20 Q You had to start building it from the ground up.

21 A Okay. Well, I --

22 Q Not renovation construction.

23 A Well, I've taken properties down to the ground
24 doing big renovations and built up from there; would that
25 be ground up?

1 Q Sure, tell me about those.

2 A Some of them have been mostly apartments.

3 Q Is that where you tore down a building and built
4 new apartments from the ground up? Is that what you're
5 telling me?

6 A Yes.

7 Q Okay. I'm getting some background noise, so
8 it was a little hard to hear you there, but why don't you
9 go ahead and tell me what those were?

10 A I can tell you about recent ones I've done. I
11 did 5 Isaacs Street across the street from the POKO
12 building. I did 4 Berkley Street. 5 Isaacs was six
13 apartments. 4 Berkley was 11 apartments.

14 Q Okay. All right. Were any of those apartment
15 developments a mixed use project that also had a retail or
16 commercial use?

17 A So are we only talking about ground up at this
18 point? And I'm also -- that's not even a term I use. So I
19 don't believe that I've started from dirt and built a mixed
20 use project.

21 Q Okay.

22 A Part of the reason is, I don't like dealing with
23 the municipal bodies. And if I can avoid layers and layers
24 of bureaucracy, I do. And ground up requires a lot more
25 bureaucracy, especially in Norwalk.

1 Q Okay. Did you finish your answer?

2 A I don't really know what the hell the question
3 is.

4 Q Have any of your renovation projects -- I assume
5 that's the distinction you were making between the ground
6 up versus renovation. Have any of your renovation projects
7 been a mix used project?

8 A Yes.

9 Q What was the largest of those?

10 A Square feet?

11 Q Number of apartments?

12 A 16.

13 Q And that was a renovation project?

14 A Yes, I've done several. 11.

15 Q Where was the 16 apartments?

16 A Norwalk.

17 Q What's the address?

18 A Do I have to answer all these questions? Why do
19 I have to answer all these questions?

20 Q You don't know the address?

21 MR. RUBIN: You do. Jason just asked me
22 why he has to answer these questions. I know this is a
23 very unusual situation with leading, but I told him that I
24 thought he need to answer these questions. I can explain
25 to him why, but I'm going to put you back on mute.

1 right in the project and plan area. So, of course, it was
2 going to get amended. And that's standard practice. The
3 plan's been amended multiple times over years and decades.
4 And they changed considerably. It's mixed use development
5 with hotels and million square feet of office space to a
6 mall, hundred percent retail. How does that happen with
7 four different owners?

8 Q Do --

9 A And I'm referring to the development project down
10 the street, if you didn't catch that.

11 Q I did. I don't think I heard me tell me whether
12 you or any of your companies have experience in public
13 private development projects, though.

14 A So I personally do not have experience with a
15 public private development project. What I do have
16 experience, negotiating with municipalities and creating an
17 agreement and a project is an easy thing to do for me. And
18 who actually constructs it, and who's hired to hammer the
19 nails and bring their crew in there, it is a different
20 deal, right, that's a different part of the process.

21 Q Okay. I'm just moving now to the next part of
22 that paragraph that continues over to page three where the
23 agency would need to look at Wall Street's experience. And
24 this includes its members and investors providing housing
25 opportunities, including but not limited to insuring that

1 system.

2 Q Okay. I think we're done with that one for now.
3 I've introduced Exhibit 71, and I'll just share that for
4 everybody. Can you see that?

5 A It says top ten trial lawyers at the top.

6 Q It's just a one-page exhibit. I'm just scrolling
7 down at the bottom so you can see there's nothing there I'm
8 going to ask you about, but this was printed by -- off a
9 LinkedIn. Is this your profile on LinkedIn?

10 A I don't know.

11 Q Did you create a profile on LinkedIn?

12 A I think I did.

13 Q And it states under your name short sales
14 specialist. I assume you entered that title for yourself;
15 is that right?

16 A Is it right that you assume that?

17 Q Did you enter that title for yourself?

18 A Probably.

19 Q Under experience it says, again, short sale
20 specialist. What did you mean by that term, "short sale
21 specialist"?

22 A Someone who specializes in short sales.

23 Q All right. And how did you -- how do you define
24 short sale when you're using it in this description?

25 A I didn't.

1 became an issue. If it went any further.

2 Q Okay. Are you aware that the debt owed under the
3 terms of the CC Rivington note has been paid and
4 satisfied?

5 A Well, you've made that claim.

6 Q Okay. So you're aware of it?

7 A I'm aware of your claim of that, yes.

8 Q And then, so is there a reason you haven't filed
9 and recorded the release of mortgage that you're holding in
10 your possession?

11 A Yes.

12 Q Why is that?

13 A Because I don't believe I have to.

14 Q Okay. But you understand that the underlying
15 debt has been satisfied and paid in full?

16 A That's between you and Olson.

17 Q Okay.

18 A As far as my purposes for that debt, I still
19 maintain that I can use it, and I can use our participation
20 agreement for the way I intended.

21 Q I have nothing further at this time.

22 MR. RUBIN: I have no questions.

23 THE VIDEOGRAPHER: Okay. May I close out
24 the deposition today?

25 MR. WILLIAMS: We're done for today. Thank

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C E R T I F I C A T E

I, hereby certified that I am a Notary Public in and for the State of Connecticut duly commissioned and qualified to administer oaths.

I further certify that the deponent named in the foregoing deposition was by me duly sworn and thereupon testified as appears in the foregoing deposition; that said deposition was taken by me stenographically in the presence of counsel and transcribed by means of computer-aided transcription by the undersigned, and the foregoing is a true and accurate transcript of the testimony.

I further certify that I am neither of counsel nor attorney to either of the parties to said suit, nor of either counsel in said suit, nor related to or employed by any of the parties or counsel to said suit, nor am I interested in the outcome of said cause.

Witness my hand and seal as Notary Public this 13th day of January, 2020.


Samantha M. Howell

Notary Public

My Commission expires: September 31, 2021