

SUPREME COURT OF THE STATE OF NEW YORK  
CRIMINAL TERM, QUEENS COUNTY, PART K-23

-----X  
THE PEOPLE OF THE STATE OF NEW YORK,

Plaintiffs,

-against-

HARRY DORVILIER,  
HARRY'S NURSES REGISTRY, INC.

Defendants.  
-----X

Indictment Number:  
1709 / 2010  
-----

AFFIDAVIT

Men Fan Chak, having been duly sworn, deposes and states under oath as follows:

1. I am the Bookkeeper of Harry's Nurses Registry, Inc., and I have been employed by Harry's Nurses Registry, Inc., since on or about July 21, 2004.
2. Harry's Nurses Registry is owned and operated by Harry Dorvilier.
3. One of my duties as the Bookkeeper of Harry's Nurses Registry is to maintain the books and records of the company, including the payroll records for Harry's Nurses Registry.
4. In order to maintain the books and records, including the payroll records for Harry's Nurses Registry, I use and operate the computer system at Harry's Nurses Registry's offices.
5. Harry's Nurses Registry retained the services of a Certified Public Accountant, Eric Rogers, CPA.

6. I recall that in 2006, CPA Eric Rogers personally reprogrammed Harry's Nurses Registry's computer to make a \$1 per-hour payroll deduction from nurses' paychecks for Workers' Compensation Insurance premiums.
7. I additionally recall that CPA Rogers made a special visit to the offices of Harry's Nurses Registry for the purpose of setting up the computer to make the payroll deduction for Workers' Compensation Insurance premiums.
8. The payroll deduction for Workers Compensation Insurance for nurses began when CPA Rogers changed the computer program. Harry's Nurses Registry had not deducted any amount for Workers' Compensation Insurance from nurses' pay checks before the CPA made this change.
9. I was neither interviewed nor questioned by Harry Dorvilier's trial attorney.
10. If asked, I would have testified to the facts set forth in this affidavit at the trial of Harry Dorvilier, and if necessary I am willing to appear in court in the future to testify to the facts set forth in this affidavit.

  
Men Fan Chak

Sworn to before me this  
22nd day of August, 2012

  
Notary Public

RICHARD A. FINKEL  
Notary Public, State of New York  
No. 02FI4645981  
Qualified in Nassau County  
Commission Expires March 30, 2015