

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

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**THE PEOPLE OF THE STATE OF NEW YORK,**

**Plaintiffs,**

**-against-**

**HARRY DORVILIER,  
HARRY'S NURSES REGISTRY, INC.**

**Defendants.**  
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**Indictment Number:  
1709 / 2010**  
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**AFFIDAVIT**

Debra Harry, having been duly sworn, deposes and stated under oath as follows:

1. I am the Nursing Supervisor for Nurses Registry, Inc., and I have been employed by Harry's Nurses Registry, Inc., since on or about December 5, 2007.
2. Harry's Nurses Registry is owned and operated by Harry Dorvilier.
3. In addition to my duties as Nursing Supervisor of Harry's Nurses Registry, during the first half of 2012, I assisted Harry Dorvilier and his trial attorney Mitchell Alter in preparing for the criminal trial in of Harry Dorvilier and Harry's Nurses Registry in State Court Queens County.
4. During trial preparations, the trial attorney, Mr. Alter, was informed that Harry's Nurses Registry retained the professional services of a Certified Public Accountant, Eric Rogers, CPA, for professional advice concerning issues of Workers Compensation Insurance requirements that were the subject of the criminal trial.

5. Specifically, Mr. Alter was informed that CPA Eric Rogers advised Harry's Nurses Registry to deduct \$1 per hour from the payments made to the Registered Nurses to defray the cost of Workers Compensation Insurance, and that to implement his professional advice, Eric Rogers personally reprogrammed Harry's Nurses Registry's computer to make the \$1 per hour deduction.
6. Mr. Alter was additionally informed that Eric Rogers advised Harry Dorvilier that the nurses should receive written notice of the Workers Compensation Insurance deduction, and therefore that Eric Rogers drafted and prepared a letter for distribution to the nurses.
7. Mr. Alter was also informed that at least two long time employees of Harry's Nurses Registry, namely: Men Fan Chak the Comptroller and Carmen Gianesses the Coordinator, personally knew of the advice that CPA Rogers had given, that CPA Rogers had personally reprogrammed the computer to make the \$1 per hour deduction, and that CPA Rogers had drafted a written notice to inform the nurses of the payroll deduction.
8. Mr. Alter also was told that Ms. Chak and Ms. Gianesses remembered that Harry Dorvilier relied upon the advice of Eric Rogers concerning the deduction for Workers Compensation Insurance from the payments made to the nurses, and the deduction was implemented because this was the professional advice provided by CPA Eric Rogers.

9. Mr. Alter was also advised that Ms. Chak and Ms. Gianesses were available and willing to testify at the criminal trial in State Court.

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Debra Harry

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

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Notary Public