

Filed Client Affidavits

Superior Court Civil Action No 15-2492-D

- Victor Campisi, II
- Paulette Cappadona
- Mary Gemielli
- Linda Hybertson
- Lois Kane
- Joseph Menice
- Grace Mucci
- Alfred Peterson
- Bruce Russell
- Jane Venckauskas

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF VICTOR A. CAMPISI, II

I, Victor A. Campisi, II, do depose and say:

1. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.
2. My mother is Gloria J. Campisi and she is 90 years old. I am my mother's primary care giver. I look after her and take care of her.
3. On September 28, 2012, my mother obtained a reverse mortgage loan from a reverse mortgage lender with the assistance of Daniel Matthews, a mortgage loan originator with Direct Finance Corp. I assisted my mother in applying for and obtaining the reverse mortgage loan. My mother wanted the reverse mortgage loan in order to obtain the funds necessary for her to pay long overdue real estate taxes owed on real estate that she owned and to have liquid funds available to her to provide for her every day needs. Before our initial meeting with Daniel

Matthews to discuss the merits of a reverse mortgage loan, I researched reverse mortgages in order to understand their benefits and risks on behalf of my mother. My mother relied upon me to advise her on whether or not she should obtain a reverse mortgage loan.

4. Daniel Matthews was not referred to my mother or me by James Moniz. Instead, Daniel Matthews was referred to us by Attorney Eunmi Lee, whose husband I knew and I had worked with him in the film industry.

5. Daniel Matthews met with me and my mother two times at my mother's Somerville home, initially to discuss reverse mortgages in general and subsequently to apply for the reverse mortgage. My mother and I were very pleased with Daniel Matthews' professionalism. At our first meeting with Daniel Matthews, he carefully and patiently explained reverse mortgages to me and my mother and he provided us with written materials that explained reverse mortgages for us to read. He did not pressure us to apply for a reverse mortgage. He answered all of our questions to our satisfaction. Daniel Matthews did not misrepresent any of the terms of the reverse mortgage to me or my mother. At our first meeting with Daniel Matthews we told him that we would get back in touch with him if my mother decided to proceed with the reverse mortgage loan. Thereafter I contacted Daniel Matthews and told him that my mother wanted to apply for a reverse mortgage loan. Daniel Matthews returned to my mother's home a second time on July 26, 2012 at which time my mother filled out and signed the reverse mortgage loan application. I assisted my mother during the entire process.

6. Daniel Matthews provided my mother with a duplicate set of the all of the loan documents that my mother was required to sign in applying for the reverse mortgage loan. The closing attorney, Attorney Patrick Fitzgerald, also provided my mother with all of the loans documents that she signed at the closing.

7. I attended the closing with my mother, held at Attorney Fitzgerald's law firm, on September 28, 2012. The reverse mortgage loan was in the sum of \$380,000. My mother was given the option not to take all of the proceeds in a lump sum. My mother decided to take a lump sum payment at the closing of \$351,344.52, after payment of fees, commissions, real estate taxes, and other routine closing costs, all of which was fully explained to my mother and me in advance of the closing by Daniel Matthews and by Attorney Fitzgerald at the closing. I supported my mother's decision to take a lump sum amount.

8. At the time of the closing, my mother did not intend to purchase any annuities or other investment products funded with the reverse mortgage proceeds. In connection with the reverse mortgage loan application that my mother signed, and at the time of the closing, my mother truthfully represented that she "did not intend to use the reverse mortgage to purchase or invest in financial products such as insurance, mutual funds or annuities". A true copy of the declaration page to the reverse mortgage loan application making such representation, which page my mother initialed, is attached hereto as Exhibit A. This was a truthful representation because at the time that she applied for the reverse mortgage loan and at the time of the closing my mother had no such intention. The decision to purchase annuities was decided after the closing and only after carefully considering the merits of such investment.

9. Daniel Matthews did not provide my mother or me with any financial or investment advice. Daniel Matthews did not recommend that my mother use her reverse mortgage proceeds for investment purposes or for any other purpose. Daniel Matthews did not play any role in my mother's decision to purchase annuities.

10. My mother did not have a financial advisor and I did not know any financial advisor. On behalf of my mother, I asked Daniel Matthews if he knew any financial advisor to

recommend to us. Daniel Matthews referred us to James Moniz. Daniel Matthews gave me Mr. Moniz' phone number and I asked Daniel Matthews to give my phone number to Mr. Moniz in order for Mr. Moniz or his office to contact me to arrange a meeting with me and my mother. My mother and I were very pleased with such referral.

11. Attached at Exhibit B is a true copy of my e-mail to Daniel Matthews, dated August 31, 2012, which I sent on behalf of my mother, asking Daniel Matthews about when we can meet with the financial planner that he knew (James Moniz). I sent such e-mail to Daniel Matthews because my mother and I wanted to meet and consult with Mr. Moniz.

12. My mother and I met with Mr. Moniz more than once at his office. Sometime after the closing, at a follow-up meeting with Mr. Moniz at his office, Mr. Moniz recommended to me and my mother that she should use her reverse mortgage loan proceeds to purchase two (2) annuities. Mr. Moniz explained the annuities to us to our satisfaction and he answered all of our questions. Mr. Moniz did not pressure my mother to purchase such annuities. I supported my mother's decision to purchase such annuities. My mother's decision to purchase such annuities was freely and knowingly made by her. Daniel Matthews did not attend the meeting held at Mr. Moniz' office at which my mother decided to purchase the annuities. Daniel Matthews played no role in this investment decision. We did not look to or rely upon Daniel Matthews for any financial advice in connection with my mother's decision to purchase such annuities.

13. My mother and I do not consider the annuities that she purchased to be unsuitable or a bad investment. The annuities are making a reasonable return for my mother and she is not unhappy in owning them. My mother has not sustained any harm in purchasing these annuities.

14. I am not aware of anything that Daniel Matthews or James Moniz did that was misleading, unfair or deceptive. Daniel Matthews and James Moniz did not prey upon my mother to obtain a reverse mortgage and they did not encouraged or convince her to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment product.

15. Daniel Matthews and James Moniz did not work together to convince my mother to apply for a reverse mortgage in order to then invest the loan proceeds in annuities or any other investment product. In fact, we were the ones who contacted Daniel Matthews initially about a reverse mortgage loan and at the time we contacted Daniel Matthews my mother was already considering a reverse mortgage loan to meet her financial needs. My mother's decision to invest the reverse mortgage loan proceeds in annuities took place after the closing.

16. If asked to recommend a mortgage broker for a reverse mortgage loan, I would recommend Daniel Matthews. If asked for a financial advisor recommendation, I would recommend James Moniz.

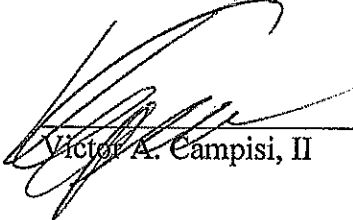
17. My mother and I did not have any communications with Assistant District Attorney Tiffany Bartz or any one else from the Massachusetts Attorney General's Office before the commencement of this lawsuit. Our first communication with the Massachusetts Attorney General's Office was by way of a letter from Assistant District Attorney Bartz dated August 26, 2015 and addressed to my mother.

18. After receiving such letter from Assistant District Attorney Bartz, I telephoned her and I spoke to her only once. I represented to her that my mother and I considered Daniel Matthews and James Moniz to be honest and up-standing business professionals. I also told Assistant District Attorney Bartz that I would be willing to testify as much in Court. I did not

speak to anyone else from the Massachusetts Attorney General's Office. My mother did not speak to Assistant District Attorney Bartz or anyone else from the Massachusetts Attorney General's Office.

19. During the only conversation that I had with Assistant District Attorney Bartz, she did not review with me any of the allegations set forth in the Complaint filed in this action nor did she provided me or my mother with a copy of such Complaint.

Signed under the pains and penalties of perjury this 5 day of October, 2015.



Victor A. Campisi, II

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,)
)
)
 Plaintiff,)
)
)
 v.)
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)
 JAMES E. MONIZ,)
 DANIEL MATTHEWS, and)
 DIRECT FINANCE CORP.,)
)
)
 Defendants.)

AFFIDAVIT OF PAULETTE CAPPADONA

I, Paulette Cappadona, do depose and say:

1. My name is Paulette Cappadona. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. I knowingly and voluntarily obtained a reverse mortgage loan in order to use the proceeds to pay living expenses. No one coerced, pressured or preyed upon me into applying for and obtaining the reverse mortgage loan. I have no complaints as to Daniel Matthews, the mortgage loan originator, in the manner in which he dealt with me and assisted me in applying for and obtaining the reverse mortgage loan. Mr. Matthews was very professional, polite and friendly in dealing with me.

3. No one encouraged me or tried to convince me to obtain the reverse mortgage loan in order to invest the loan proceeds in an annuity or any other financial investment product.

I had obtained the reverse mortgage loan in order to use the proceeds to pay living expenses. It was only a number of months after obtaining the reverse mortgage loan that I decided to invest some of the reverse mortgage loan proceeds in an annuity on the advice of my financial and investment advisor, James Moniz.

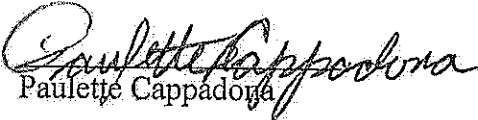
4. I received copies of the reverse mortgage loan application papers from Daniel Matthews at the time that I signed them.

5. I have not had any dealings with Daniel Matthews since obtaining the reverse mortgage loan.

6. James Moniz was my financial and investment advisor. Mr. Moniz was the only professional who I looked to for financial and investment advice. Mr. Matthews did not provide me with any financial or investment advice.

7. I was contacted by the Massachusetts Attorney General's Office. I made no complaints to the Massachusetts Attorney General's Office about Mr. Matthews. In fact, the Massachusetts Attorney General's Office did not ask me any questions about Mr. Matthews.

Signed under the pains and penalties of perjury this 31 day of October, 2015.


Paulette Cappadora

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF MARY J. GEMELLI

I, Mary J. Gemelli, do depose and say:

1. My name is Mary J. Gemelli. I am 73 years old. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. I knowingly and voluntarily obtained a reverse mortgage loan in order to have a line of credit available in case I needed to access it to support myself or to pay for things that I needed. No one coerced or pressured me to apply for and obtain the reverse mortgage loan. Before deciding to apply for a reverse mortgage loan, I reviewed it with my two adult children and they both approved of the reverse mortgage loan transaction. Neither Daniel Matthews nor anyone else preyed upon me to obtain a reverse mortgage loan and no one encouraged or tried to convince me to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity

or any other investment product. I believe that I received copies of the reverse mortgage loan application papers at the time that I signed them.

3. The closing took place at my home on June 30, 2011. My two adult children were with me at the closing. What I signed was explained to me and I received a complete set of all of the closing loan documents. At no time since the closing have I spoken to or met with Daniel Matthews.

4. Prior to and at the time of the closing, I did not intend to invest the loan proceeds in annuities or any other investment product. In connection with the reverse mortgage loan application that I signed and the closing loan documents that I signed, I truthfully represented that I "did not intend to use the reverse mortgage to purchase or invest in financial products such as insurance, mutual funds or annuities". A true copy of the declaration page to the reverse mortgage loan application making such representation, which page I initialed, is attached hereto as Exhibit A. A true copy of the Request for Information Concerning the Borrower's Intent to Purchase an Annuity as Part of the Reverse Mortgage Transaction that I signed at the closing is attached hereto as Exhibit B.

5. Daniel Matthews was very polite, friendly and professional towards me. He did not pressure me to apply for or to obtain a reverse mortgage loan. I am not aware of Daniel Matthews doing anything towards me that was misleading, unfair or deceptive. I do not blame Daniel Matthews for doing anything wrongful towards me.

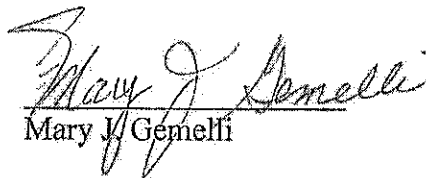
6. I spoke Assistant District Attorney Tiffany Bartz of the Massachusetts Attorney General's Office. I did not make any complaints to her about Daniel Matthews. I did not inform Assistant District Attorney Bartz that Daniel Matthews preyed upon me or that he coerced or pressured me to apply for and obtain a reverse mortgage loan. I wanted the reverse mortgage

loan. I did not inform Assistant District Attorney Bartz that Daniel Matthews encouraged or convinced me to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment product. I did not inform Assistant District Attorney Bartz that Daniel Matthews misrepresented the terms of the reverse mortgage loan to me.

7. I knew James Moniz before meeting Daniel Matthews. Daniel Matthews did not provide me with any financial or investment advice nor did I ever look to him for financial or investment advice. After the closing, I did not have any further contact or communications with Daniel Matthews about the reverse mortgage loan proceeds or the use or investment of such proceeds.

8. It was James Moniz who purchased an annuity in my name with my reverse mortgage loan proceeds. I do not blame Daniel Matthews for this investment.

Signed under the pains and penalties of perjury this 31st day of October, 2015.


Mary J. Gemelli

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF LINDA HYBERTSON

I, Linda Hybertson, do depose and say:

1. My name is Linda Hybertson, the daughter of Beverly B. Hybertson, who is deceased. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. I was authorized by my mother to act on her behalf as her Attorney-in-Fact with respect to the subject matters of this Affidavit.

3. On account of my mother's medical and healthcare needs, I decided it was in her best interest to obtain a reverse mortgage loan using the equity in her residence in order to have the funds necessary to care for her. This decision was made by me after consulting with James Moniz, who was my financial advisor. Accordingly, on my mother's behalf, I contacted Daniel

Matthews of Direct Finance Corp. to apply for and obtain a reverse mortgage loan. At the time my mother was 77 years old.

4. Daniel Matthews explained reverse mortgages to me and he provided me with written materials about reverse mortgages. He answered all of my questions to my satisfaction. I am not aware of Daniel Matthews misrepresenting any of the terms of the reverse mortgage to me. He provided me with a duplicate set of all of the loan documents that I was required to sign in applying for the reverse mortgage loan.

5. Daniel Matthews did not coerce or pressure me in applying for and obtaining the reverse mortgage loan. Daniel Matthews did not prey upon me to obtain a reverse mortgage and he did not encourage or convince me to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment product. I knowingly and willfully applied for and obtained the reverse mortgage loan on behalf of my mother. In fact, I was the one who contacted Daniel Matthews to apply for a reverse mortgage loan after I had decided that it was in the best interest of caring for my mother to do so after consultation with James Moniz. I have no complaints as to how Daniel Matthews acted in assisting me in applying for and obtaining the reverse mortgage loan. At all times Daniel Matthews acted professionally. I am not aware of anything that Daniel Matthews did that was misleading, unfair or deceptive.

6. The closing occurred at the Law Office of Attorney Patrick Fitzgerald on October 10, 2012. Daniel Matthews did not attend the closing. I am the one who decided to take a lump sum payment of the loan proceeds rather than a line of credit or monthly installment payments.

7. At the time of the closing, I did not intend to purchase any annuities or other investment products funded with the reverse mortgage proceeds. In connection with the reverse mortgage loan application that I signed, and at the time of the closing, I truthfully represented

that I "did not intend to use the reverse mortgage to purchase or invest in financial products such as insurance, mutual funds or annuities". A true copy of the declaration page to the reverse mortgage loan application making such representation, which page I signed on behalf of my mother as her Attorney-in-Fact, is attached hereto as Exhibit A. This was a truthful representation because at the time that I applied for the reverse mortgage loan and at the time of the closing I had no such intention.

8. After the closing I did not have any further contact or communications with Daniel Matthews concerning the reverse mortgage loan or investment of the loan proceeds.

9. James Moniz was the financial advisor to whom I looked to and relied upon for financial and investment advice. Daniel Matthews did not provide me with any financial or investment advice nor did I look to him or rely upon him for any financial or investment advice. Daniel Matthews did not recommend to me that I use the reverse mortgage proceeds for investment purposes or for any other purpose.

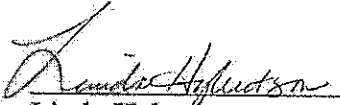
10. Sometime after the closing, a meeting was held with James Moniz at his office with me and my brother. Daniel Matthews did not attend this meeting. At this meeting we discussed whether or not to invest the reverse mortgage loan proceeds. I was of the view that the loan proceeds should be deposited in a non-interest bearing bank account as my mother was receiving Medicare healthcare benefits at the time. James Moniz and my brother recommended to me that the loan proceeds should be invested in some investment vehicle. No decision was made at this meeting as to what the investment would be but I did reluctantly go along with their recommendation to invest the reverse mortgage loan proceeds in some fashion.

11. Subsequent to such meeting, James Moniz purchased an annuity with the reverse mortgage loan proceeds. I knew that James Moniz intended to invest the loan proceeds in some

investment product but I did not know what it would be. I do not believe that James Moniz advised me in advance that he would use the loan proceeds to purchase an annuity.

12. I spoke to Assistant District Attorney Tiffany Bartz from the Massachusetts Attorney General's Office. I did not inform Assistant District Attorney Bartz that Daniel Matthews preyed on me or that he coerced or pressured me to apply for and obtain a reverse mortgage loan. I did not inform Assistant District Attorney Bartz that Daniel Matthews encouraged or convinced me to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment product. I did not inform Assistant District Attorney Bartz that Daniel Matthews failed to provide me with the reverse mortgage loan application forms that I signed in order to prevent me from reading and reviewing the terms. I did not inform Assistant District Attorney Bartz that Daniel Matthews misrepresented the terms of the reverse mortgage loan to me. I made no complaint to Assistant District Attorney Bartz about Daniel Matthews.

Signed under the pains and penalties of perjury this 20 day of October, 2015.


Linda Hybertson

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF LOIS M. KANE

I, Lois M. Kane, do depose and say:

1. My name is Lois M. Kane. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.
2. My husband and I knowingly and voluntarily obtained a reverse mortgage loan in order to use the proceeds to pay living expenses. No one coerced, pressured or preyed upon us into applying for and obtaining the reverse mortgage loan. We have no complaints as to Daniel Matthews, our mortgage loan originator, in the manner in which he dealt with us and assisted us in applying for and obtaining the reverse mortgage loan. Mr. Matthews was very professional, polite and friendly in dealing with us.
3. No one encouraged us or tried to convince us to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other financial investment product. Our

reverse mortgage loan proceeds were not used to purchase an annuity or to invest in any other financial investment product.

4. We received copies of the reverse mortgage loan application papers from Daniel Matthews at the time that we signed them.

5. We have not had any dealings with Daniel Matthews since obtaining the reverse mortgage loan.

6. James Moniz was our financial and investment advisor. Mr. Moniz was the only professional who we looked to for financial and investment advice. Daniel Matthews did not provide us with any financial or investment advice. We have no complaints as to Mr. Moniz.

7. We have made no complaints to the Massachusetts Attorney General's Office about Mr. Matthews or Mr. Moniz.

Signed under the pains and penalties of perjury this 28th day of October, 2015.


Lois M. Kane

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,)
)
Plaintiff,)
)
v.)
)
JAMES E. MONIZ,)
DANIEL MATTHEWS, and)
DIRECT FINANCE CORP.,)
)
Defendants.)

AFFIDAVIT OF JOSEPH MENICE

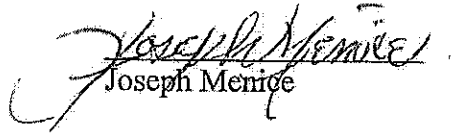
I, Joseph Menice, do depose and say:

1. My name is Joseph Menice. I am 88 years old. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.
2. My wife and I knowingly and voluntarily obtained a reverse mortgage loan in or about late 2007. No one coerced, pressured or preyed upon us into applying for and obtaining the reverse mortgage loan. We have no complaints as to our mortgage loan originator (Daniel Matthews) in the manner in which he dealt with us and assisted us in obtaining our reverse mortgage loan. We have had no dealings with our mortgage loan originator since obtaining our reverse mortgage loan.
3. We intended to use our reverse mortgage loan to supplement our retirement income and to live on.

4. James Moniz was our financial advisor. Mr. Moniz is the only professional who we have looked to for financial advice. We have no complaints as to Mr. Moniz.

5. My wife and I have not made any complaints to anyone at the Massachusetts Attorney General's Office about Mr. Matthews or Mr. Moniz.

Signed under the pains and penalties of perjury this 7th day of ^{November} ~~October~~, 2015.


Joseph Merice

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF GRACE M. MUCCI

I, Grace M. Mucci, do depose and say:

1. My name is Grace M. Mucci. I am 82 years old. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.
2. My husband is Salvatore Mucci. We have been married for 65 years.
3. At the time that my husband and I were considering a reverse mortgage loan, we wanted to use the existing equity in our home to increase our financial security. Before deciding on obtaining a reverse mortgage loan, we discussed the matter with our financial advisor, James Moniz, who has been our financial advisor for a number of years. After consulting with Mr. Moniz, my husband and I decided that we wanted to meet with a reverse mortgage broker. At our request, Mr. Moniz recommended Daniel Matthews of Direct Finance to us. We contacted Mr. Matthews and we made arrangements with him to meet with us.

4. At our request, Mr. Matthews met with us at our home. Mr. Moniz was not present. Mr. Matthews thoroughly and patiently explained reverse mortgages to us and he provided us with written materials about reverse mortgages to read. He answered all of our questions to our satisfaction. Mr. Matthews was very professional, straight forward, and honest. He did not pressure us. He did not misrepresent anything to us. He did not say anything to us that was misleading, untruthful, or dishonest. He did not engage in any conduct that could be considered as unfair or deceptive. We have no complaints as to how Mr. Matthews acted in assisting us in applying for and obtaining the reverse mortgage loan. We would gladly recommend Mr. Matthews to others interested in obtaining a reverse mortgage loan.

5. Mr. Matthews and Mr. Moniz did not coerce or pressure us in applying for and obtaining the reverse mortgage loan. Mr. Matthews and Mr. Moniz did not prey upon us to obtain a reverse mortgage and they did not encourage or convince us to obtain a reverse mortgage loan in order to invest the loan proceeds in insurance, annuities or any other investment or financial products. We knowingly and willfully applied for and obtained the reverse mortgage loan to invest the loan proceeds, with the professional assistance of our financial advisor, Mr. Moniz, in order to provide us with greater financial security. We made this decision on our own, after carefully considering the investment advice of Mr. Moniz. Our investment decisions were made after the loan closing. It was not our intention prior to closing to invest in any annuity.

6. Mr. Matthews provided us with a duplicate set of the loan documents that we were required to sign in applying for the reverse mortgage loan. Mr. Matthews did not misrepresent any of the terms of the reverse mortgage loan to us.

7. The closing occurred at the Law Office of Attorney Patrick Fitzgerald. Mr. Matthews and Mr. Moniz did not attend the closing. One of our adult daughters attended the

closing with us. We decided on our own to take at the closing a lump sum payment of the loan proceeds.

8. After the closing we did not have any further contact, communications or meetings with Mr. Matthews.

9. James Moniz was our financial advisor to whom we looked to and relied upon for financial and investment advice. Mr. Matthews did not provide us with any financial or investment advice nor did we look to him or rely upon him for any financial or investment advice. Mr. Matthews did not recommend to us to use the reverse mortgage loan proceeds for investment purposes or for any other purposes.

10. Sometime after the loan closing, and after consulting with only James Moniz, we made our investment decisions with the loan proceeds. Mr. Matthews played no role in our investment decisions. We are happy with our investment decisions, which have provided us with greater financial security. We have not suffered any loss from our investment decisions.

11. We have no complaints about Mr. Moniz. He has always acted professionally and in our best interest. He did not do or say anything to us that was misleading, untruthful, or dishonest. He did not engage in any conduct that could be considered as unfair or deceptive. He has been honest and transparent with us. We would gladly recommend him to others who are looking for a financial or investment advisor.

12. Assistant District Attorney Tiffany Bartz from the Massachusetts Attorney General's Office called me. I made no complaints to her about Mr. Matthews or Mr. Moniz. I did not inform her that Mr. Matthews or Mr. Moniz preyed on us, or coerced or pressured us to apply for and obtain a reverse mortgage loan, or that they encouraged or tried to convince us to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other

investment or financial product. I did not inform her that Mr. Matthews failed to provide us with the reverse mortgage loan application forms in order to prevent us from reading and reviewing their terms. I did not inform her that Mr. Matthews misrepresented the terms of the reverse mortgage loan to us. I did not inform her that Mr. Matthews or Mr. Moniz did or said anything that was untrue, dishonest, misleading, unfair or deceptive.

Signed under the pains and penalties of perjury this 10 day of January, 2016.


Grace M. Mucci

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF ALFRED PETERSON

I, Alfred Peterson, do depose and say:

1. My name is Alfred Peterson. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. My wife and I knowingly and voluntarily obtained a reverse mortgage loan. We used the reverse mortgage proceeds to purchase a second home in Florida. No one coerced, pressured or preyed upon us into applying for and obtaining the reverse mortgage loan. No one encouraged us or tried to convince us to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment or financial product.

3. Our mortgage loan originator was Daniel Matthews. We initially met Mr. Matthews at our home in Quincy, Massachusetts. At such meeting Mr. Matthews explained reverse mortgages to us and answered our questions to our satisfaction. We are not aware of Mr.

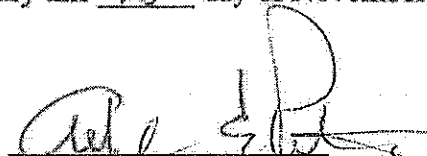
Matthews misrepresenting any of the terms of the reverse mortgage to us. We have no complaints as to Mr. Matthews. At all times Mr. Matthews acted professionally, polite and friendly in the manner in which he dealt with us and in assisting us in applying for and obtaining our reverse mortgage loan. We are not aware of anything that Mr. Matthews did that was misleading, unfair or deceptive towards us. We would gladly recommend Mr. Matthews to others who are interested in obtaining a reverse mortgage loan.

4. Mr. Matthews provided us with a duplicate set of the loan documents that we signed in applying for the reverse mortgage loan.

5. James Moniz has been our trusted financial and investment advisor for many years. Mr. Moniz has always acted professionally, in our best interests, and in an honest and transparent manner. We have no complaints as to Mr. Moniz and we would gladly recommend him to others who are interested in retaining a financial or investment advisor.

6. My wife and I were contacted by someone from the Massachusetts Attorney General's Office. We did not make any complaint about Mr. Matthews or Mr. Moniz to the person we spoke to from the Massachusetts Attorney General's Office.

Signed under the pains and penalties of perjury this 18 day of November, 2015.


Alfred Peterson

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,)
)
)
 Plaintiff,)
)
 v.)
)
 JAMES E. MONIZ,)
 DANIEL MATTHEWS, and)
 DIRECT FINANCE CORP.,)
)
 Defendants.)

AFFIDAVIT OF BRUCE RUSSELL

I, Bruce Russell, do depose and say:

1. My name is Bruce Russell, the son of Walter Russell, who is deceased. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. I was very close to my father and I saw him almost every day. Until shortly before my father died in late 2012, my father was mentally alert and sharp as a tack.

3. In or about 2010, my father obtained a reverse mortgage loan from a reverse mortgage lender with the assistance of Daniel Matthews, a mortgage loan originator with Direct Finance Corp. I assisted my father in applying for and obtaining the reverse mortgage loan. My father wanted the reverse mortgage loan in order to supplement his income. I supported my father's decision to obtain the reverse mortgage loan.

4. Daniel Matthews met with me and my father at my father's home in Walpole, Massachusetts. Daniel Matthews carefully and patiently explained reverse mortgages to me and

my father and he provided my father with written materials that explained reverse mortgages for him to read. Daniel Matthews did not pressure my father to apply for a reverse mortgage. He answered all of my father's questions and he provided my father with duplicate set of the all of the loan documents that my father was required to sign in applying for the reverse mortgage loan. My father obtained reverse mortgage counseling which took place over the phone, and I was present at the time.

5. I am not aware of Daniel Matthews misrepresenting any of the terms of the reverse mortgage to my father. My father knowingly and willfully applied for and obtained the reverse mortgage loan. Daniel Matthews did not coerce or pressure my father in applying for and obtaining the reverse mortgage loan. Daniel Matthews did not prey upon my father to obtain a reverse mortgage and he did not encourage or try to convince my father to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other investment product. My father never made any complaints as to how Daniel Matthews acted in assisting him in applying for and obtaining the reverse mortgage loan. At all times Daniel Matthews acted professionally and I am not aware of anything that Daniel Matthews did or said that was misleading, untrue, unfair or deceptive.

6. My father's financial advisor was James Moniz. My father had known Mr. Moniz for about fifteen (15) years before he had obtained the reverse mortgage loan. My father looked solely to Mr. Moniz for financial and investment advice. Daniel Matthews did not provide my father with any financial or investment advice nor did he look to him or rely upon him for any financial or investment advice. Daniel Matthews did not recommend to my father that he should use his reverse mortgage proceeds for investment purposes or for any other purpose. Daniel Matthews did not play any role in my father's decisions as to what he did with his reverse

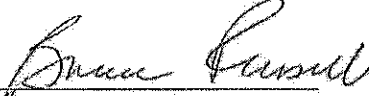
mortgage proceeds or in my father's investment decisions.

7. Based upon the recommendations of Mr. Moniz, my father used the reverse mortgage loan proceeds to purchase annuities and to invest in mutual funds. I do not know when my father made such investment decisions. My father did not consider such annuities and mutual funds to be unsuitable or a bad investment. My father was not unhappy with his investment decisions. They provided my father with a reasonable amount of money to supplement his income and, upon his death, my brother and I received certain death benefits. My father did not sustain any harm in purchasing or investing in such annuities and mutual funds.

8. I am not aware of anything that James Moniz did or said that was misleading, untrue, unfair or deceptive. James Moniz did not prey upon my father or coerce or pressure him to obtain a reverse mortgage loan. My father never made any complaints about James Moniz.

9. To my knowledge, my father did not have any communications with any one at the Massachusetts Attorney General's Office. To my knowledge, no one at the Massachusetts Attorney General's Office tried to contact my father. I never spoke to anyone at the Massachusetts Attorney General's Office and no one from the Massachusetts Attorney General's Office ever tried to contact me.

Signed under the pains and penalties of perjury this 18 day of November, 2015.


Bruce Russell

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION
NO. 15-2492-D

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

JAMES E. MONIZ,
DANIEL MATTHEWS, and
DIRECT FINANCE CORP.,

Defendants.

AFFIDAVIT OF JANE VENCKAUSKAS

I, Jane Venckauskas, do depose and say:

1. My name is Jane Venckauskas. I have personal knowledge of the facts set forth herein and I am competent to testify thereto.

2. I knowingly and voluntarily obtained a reverse mortgage loan in order to use the proceeds to pay living expenses. No one coerced, pressured or preyed upon me into applying for and obtaining the reverse mortgage loan. I have no complaints as to Daniel Matthews, the mortgage loan originator, in the manner in which he dealt with me and assisted me in applying for and obtaining my reverse mortgage loan.

3. No one encouraged me or tried to convince me to obtain a reverse mortgage loan in order to invest the loan proceeds in an annuity or any other financial investment product. My reverse mortgage loan proceeds were not used to purchase an annuity or to invest in any other

financial investment product.

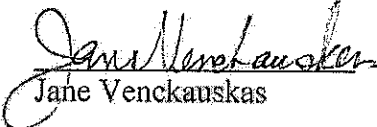
4. I received copies of the reverse mortgage loan application papers at the time that I signed them.

5. I have not had any dealings with Daniel Matthews since obtaining the reverse mortgage loan.

6. James Moniz was my financial advisor. Mr. Moniz was the only professional who I looked to for financial advice. I have no complaints as to Mr. Moniz.

7. I was contacted by the Massachusetts Attorney General's Office. I made no complaints to the Massachusetts Attorney General's Office about Mr. Matthews or Mr. Moniz.

Signed under the pains and penalties of perjury this ^{November 9th} 2nd day of October, 2015.


Jane Venckauskas