

STATE OF VERMONT

VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-CV-02848

John Durkee, Executor of the Estate of
Decedent Kenneth H. Blaisdell, Jr.,
Plaintiff

v.

Trini Brassard, Courtney Brassard, Brian Falzo,
Daniel Brassard, and Brassard Sugarworks and
Maple Supply, LLC,
Defendants

**COURTNEY BRASSARD'S RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUESTS TO PRODUCE**

NOW COMES Defendant, Courtney Brassard., by and through her attorneys, Davis
Steadman Percy & Sluka LLC, and pursuant to V.R.C.P. 26 et. seq., hereby responds to
Plaintiff's Interrogatories and Requests to Produce to Defendant, under oath, as follows:

Interrogatories

1. State your full name, date of birth, home address, occupation, and business address.

ANSWER: Courtney Blaisdell Brassard, 02/01/1991, 1330 VT-14 North, East
Randolph, VT 05041, self-employed

2. List the highest degree you have obtained , including the name of the school and
the degree awarded.

ANSWER: High School Degree, Randolph Union High School.

3. Identify all banking or other financial institutions where you have held personal or
business accounts from July 18, 2013, to the present.

ANSWER: Northfield Savings Bank, Community National Bank, Bar
Harbor Bank & Citi.

DEFENDANT'S
EXHIBIT A

3. Identify all banking or other financial institutions where you have obtained mortgages from July 18, 2013, to the present, the purpose for those mortgages and any collateral offered.

ANSWER: Bar Harbor Bank Mortgage and copy is in possession of Plaintiff.

4. Identify all real estate and/or real property that has been deeded to you from July 18, 2013 to the present, including the address, lot number, town or village, date deeded, and the amount paid by you for said property.

ANSWER: My current home and land. Information all previously or in possession of Plaintiff.

6. Identify all credit card accounts in your name open during any portion of the period July 18, 2013, to the present.

ANSWER: Capital One, Home Depot, Citi, Apple, Care Credit and Chase.

7. Identify all monies received by you from July 18, 2013, to the present from the Decedent and/or the Decedent's POA Agent, including the date, amount, and type of monetary transaction, such as gifts, payments for work, reimbursement for expenses, etc.

ANSWER: Previously provided, in possession of the plaintiff.

8. Identify all monies paid on your behalf to any creditor of yours from July 18, 2013, to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount, and type of monetary transaction.

ANSWER: None.

9. Identify all gifts purchased for you from July 18, 2013, to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount, and type of gift, such as a motor vehicle, mobile home, etc.

ANSWER: None.

10. Identify all items purchased on your behalf from July 18, 2013, to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount, and type of item.

ANSWER: No items purchased by Decedent on my behalf.

11. Identify all of your sources of income from July 18, 2013, to the present, including the name and address of the source of income and the amount and nature of the income, such as wages, contractor payments, interest, rental income, the sale of goods or property etc.

ANSWER: Great Clips until 2/14/14, Vermont Agency of Transportation until April 2015, Self-Employed July 2015- Present. See tax returns.

12. Identify any payments you have made to the Decedent from July 18, 2013, to the present, including an explanation of the reason such payment was made.

ANSWER: None, I remain willing to pay the \$101,000.00 agreed upon price.

13. Identify any leases entered into between you and the Decedent from July 18, 2013, to the present.

ANSWER: None.

14. Identify your address as of July 18, 2013, including the address, city, state, and full name with contact information for all cohabitants residing at the same location.

ANSWER: 7544 Rio Pinar Lakes Blvd., Orlando FL.

15. Identify your address as of January 31, 2014, including the address, city, state, and full name with contact information for all cohabitants residing at the same location.

ANSWER: 7544 Rio Pinar Lakes Blvd., Orlando, FL.

16. Describe the role, if any, that you played in caring for the Decedent; including but not limited to the number of hours each week dedicated to providing care, the role you played in managing medications, and the names and addresses of any other

person(s) who provided similar care.

ANSWER: My Grandfather had full access to my home, his own bedroom as well as storage for his belongings from his previous home. Our final agreement in later years was a minimum of 24 hours a week. Each day varied depending on the situation at hand. I shopped, cooked, some laundry, helped to integrate him into his previous activities, and provided company. Family members would all chip in as our goal was to integrate him into his former lifestyle, pre-stroke, as soon as possible.

17. Describe your legal relationship to Co-Defendant Brian Falzo, including when this relationship began.

ANSWER: There is no legal relationship with the exception that we are the co-owners of the property located at 1330 VT-14 N, East Randolph, VT 05041.

18. Describe your current profession, including any licenses or certifications you have obtained to pursue this career, as well as any ownership interest you have in a business.

ANSWER: Cosmetology license in NH, FL, and VT. I am the sole owner of Magnifique Salon LLC.

19. Describe what portion of the Occupied Parcel where you currently reside is used to produce hay and provide the names and addresses of all individuals you have sold hay to in the past five years.

ANSWER: All crop fields were damaged in the flood of 2023. I have never sold hay.

20. Describe what portion of the Occupied Parcel where you currently reside is used to produce gravel and provide an exact accounting of all gravel income received by you including any barter transactions related to the extraction of gravel at this same

property.

ANSWER: None of the property is utilized to produce gravel. Plaintiff is in possession of cancelled check of monies received.

21. Describe what portion of the Occupied Parcel where you currently reside was used to produce timber and provide an exact accounting of all timber income received by you since you took possession of this same parcel.

ANSWER: None.

22. Identify all transactions related to the Commodore Astro Mobile Home where you were either the buyer or the seller, including the source of funds used to purchase and the location where funds were deposited after the sale.

ANSWER: Previously provided.

23. Describe the renovations completed on the Commodore Astro Mobile Home, including the name of all contractors hired, the estimates and invoices related to the same, receipts for purchase of materials, and copies of cancelled checks or credit card purchases for payment of all work.

ANSWER: I performed renovations/repairs to the kitchen, mudroom, floors, siding, walls, and windows. All paperwork I had with regard to the renovations were taken by Brian Falzo without permission and has not been returned.

24. Describe the work paid for by you to close the gravel pit at the Occupied Parcel, including the contractors hired, the estimates and invoices related to the same, receipts for purchase of materials, and copies of canceled checks or credit card purchases for payment of all work.

ANSWER: Gravel pit is not closed, estimates and correspondence attached.

Requests for Production

1. With respect to each and every response to the foregoing Interrogatories, produce all documents identified in your response.

ANSWER: Previously provided or attached in response to the requests below.

2. With respect to all payments made or received, produce all written or electronic evidence of such payments including but not limited to canceled checks, wire transfer confirmations, deposit slips and receipts. Include any and all deposit slips and/or copies of the check(s) corresponding to each such deposit.

ANSWER: Objection, vague and burdensome.

3. With respect to all real estate identified in response to the foregoing Interrogatories, produce copies of deeds and proofs of payment for the property.

ANSWER: Previously provided or in possession of Plaintiff.

4. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a car, truck, mobile home, or motor home, produce a copy of such document.

ANSWER: In possession of Plaintiff.

5. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a vehicle, ATV, mobile home, or motor home, produce a copy of such document.

ANSWER: Duplicate request, see RTP #4.

6. With respect to income from hay, gravel, or timber sales, copies of invoices, produce copies of any and all cancelled checks, barter transaction invoices or bills of sales, any communication with vendors or individuals who made these purchases, and deposit slips from banks where income was deposited.

ANSWER: Attached and upon information and belief in Plaintiff's possession through direct discussions with W.B. Rogers.

7. Produce a complete copy of your Federal and State income tax returns from 2013 to the present, including all depreciation schedules and all source documents related to each return (including but not limited to W-2's, 1099s, and all schedules to each such tax return such as K-1s, and copies of invoices and bills of sale for any assets purchased or sold).

ANSWER: Attached.

8. With respect to all banks and other financial institutions at which you have held an account from July 18, 2013, to date, produce a copy of your monthly bank statements and copies of canceled checks, deposit slips, and wire transfer confirmations.

ANSWER: Attached.

9. Produce a complete copy of Vermont Department of Motor Vehicle records linked to your driver's license, and/or your name from July 18, 2013, to date, including new registrations for cars, trucks, trailers, motor homes, farm equipment, ATVs, boats, and campers.

ANSWER: not available.

10. Produce a complete copy of any and all communications between yourself and W.B. Rogers Gravel.

ANSWER: Duplicate request, see RTP #6.

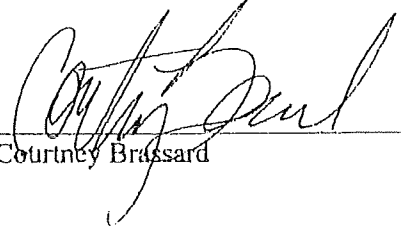
11. Produce a complete copy of any and all communications between yourself and Defendant Trini Brassard about caregiving for the Decedent.

ANSWER: Majority of communication was verbal.

12. Produce a complete copy of any and all communications between yourself and any person that in any way refers to the transfer of land from the Decedent to yourself and Brian Falzo.

ANSWER: None of which I am aware.

Dated at _____, Vermont this 31st day of May 2024.



Courtney Brassard