

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO. 24-137SD

ALFREDO LIRIANO; DANIEL)
ARROYO; CARMEN ARROYO;)
MARIA PATRONE; SANDRA PIZARRO;)
MARC AGRAMONTE; STEFON)
EVERETT; FRANSISCO VALDEZ)

Plaintiffs,)

v.)

STONY BROOK GARDENS)
COOPERATIVE CORP.; DARLENE)
JOHNSON; SHAWNA HOWARD;)
VANESSA LOPEZ)

Defendants.)

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2024 MAY 23 P 2:37
JOHN E. POWERS III
ACTING CLERK MAGISTRATE

AFFIDAVIT OF DANIEL ARROYO

1. My address is 20A Chestnut Ave, Unit #2, Jamaica Plain, MA. I reside at this address with my wife, Carmen Arroyo, and our two children.
2. I have been a resident/shareholder of Stony Brook Gardens Cooperative Corporation ("Stony Brook Gardens" or the "Cooperative"), since 1993.
3. In or around November 2022, Defendant Johnson began parking her car in my assigned handicapped parking spot. This parking spot was necessary for my son's severe disability, which requires accessible parking close our unit. I was instructed by the Board to park down the street at an alternative parking spot not easily accessible to our unit.

4. I filed a complaint with the Massachusetts Commission Against Discrimination on December 1, 2022 regarding this incident.
5. Defendant Johnson continues to park in my handicapped spot to this day. Any of my attempts to use the handicap parking spot to assist my disabled son results in threats from Defendant Johnson to tow my vehicle.
6. Since Defendant Johnson took over as President, my maintenance requests have routinely been ignored. For example, I have recently submitted multiple maintenance requests to fix my broken stove. These requests have gone ignored.
7. Around November, 2023, Defendant Johnson installed a security camera pointed directly at my apartment. Defendant Johnson has refused to remove this camera despite numerous requests.
8. I have not received a notice of Stony Brook Gardens Board of Directors election, validly noticed and delivered pursuant to the requirements of the Bylaws, since 2013.
9. In February, 2024, I received notice that a Board of Directors election would occur at Stony Brook Gardens. This notice was not in compliance with the bylaws, as it did not state the place the meeting would occur at. I attended this meeting on February 24, 2024 despite not receiving valid notice.
10. At this meeting, the Stony Brook Gardens Board did not make the Stock Ledger available. Additionally, although a quorum was present for this meeting, Defendant Johnson canceled the meeting to prevent a Board of Directors vote from proceeding.

11. Since 2016, despite repeated requests that I have made to the Board, I have not been provided with a copy of any annual audits of the Cooperative or access to the Stock Ledger of the Cooperative.

12. During the entirety of my time at Stony Brook Gardens, I have received no evidence that the Cooperative is carrying valid property/casualty insurance.

I, Daniel Arroyo, being duly sworn, deposes and says that I have read the foregoing affidavit, and believe that it is true and accurate to the best of my knowledge, information and belief.

Daniel Arroyo

Daniel Arroyo

Sworn to before me this

___ day of April, 2024

5/3/24

Katherine Margaret Gray

Notary Public

