



WT-104M — Pre-Insurance Inspection Sequence: Narrative Companion (Facts-Only)

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Attachment to WT-104 | Version: v2.1 (WHITE) | Updated: 2025-11-11

Property: 226 Franklin Street, Apt. **G21** (entrance: **97 Green Street**), Brooklyn, NY 11222

Context: October 13, 2019 flood; pre-insurance interactions through February 26, 2020

WHITE GUARDRAIL — FACT REPOSITORY ONLY

Facts & source pinpoints only. No strategy, no argument, no math.

All analysis belongs in Purple; any calculations in Blue/Red.

1) Scope, Attribution, and Method

Purpose. Preserve a neutral, citation-ready narrative of the pre-insurance inspection sequence associated with G21 after the October 13, 2019 flood. Consolidate participant identities, dates, places, and **as-reported** statements referenced in WT-104.

Attribution standard. Where wording is memorialized verbatim, text appears in quotation marks. Where sources record **“words to the effect of,”** that is noted. All items remain subject to verification via native sources (emails, headers, claim file, reports, formal statements).

Company naming correction. The contractor is **Total Restoration, Inc. (TRI)**. Both **Chris (Christopher) Roussis** and **Julian Rivera** are associated with TRI. Any legacy "Total Remediation/Industries" labels are corrected.

Structure (aligned to WT-104; day-separation explicit).

B.0 — Late-Nov 2019 early contractor inspection — Chris Roussis (TRI) with tenant Christian Gray

B.1 — Dec 11, 2019 staging / pre-inspection coordination (different day than B.2)

B.2 — Mid/late Dec 2019 master adjuster walkthrough

B.3 — Feb 26, 2020 post-carrier claim-approval walkthrough / mold scope (as reported)

2) Four-Event Chronology (facts as documented)

B.0 — Precursor: Early Contractor Inspection — Late November 2019

Window: ~Nov 19–25, 2019 (to be verified from native headers/calendar).

Anchors: WT-102 (counsel email) references the first/early visit; landlord email **Nov 22, 2019** (Violet Lautan) requests Monday access (**likely Nov 25**, confirm via headers).

People/Company: **Chris (Christopher) Roussis — Total Restoration, Inc. with tenant (Christian Gray).**

Location: G21.

Purpose (as memorialized): Moisture testing and initial scope observations following the Oct 13 flood.

Reported activities: Moisture testing throughout G21; preliminary demolition scope identified (rooms spec'd for demo); preliminary damage observations.

Verification targets: Scheduling artifacts; moisture logs/readings; photos; **original inspection report + drawings/specs explicitly calling for full demo of studio rooms**; any transmittals to **Power Adjustment** or **American Package Co.**

B.1 — Meeting #1 — Dec 11, 2019 (Staging / Pre-Inspection Coordination) — different day than B.2

Participants (as recorded in White): Evan Katz (Power Adjustment); Christian Gray; TR representative — Chris Roussis and/or Julian Rivera (presence to be established); Martin Kofman possible at beginning (to be established).

Reported quotation (verification required): Evan Katz — “Items were moved to make it look like something was being done.”

Collection targets: Photos/work orders for Dec 11–12; staging coordination emails/texts; mover invoices; **Roussis/Rivera presence** confirmation; formal statements.

B.2 — Meeting #2 — Mid/Late December 2019 (Master Adjuster Walkthrough)

Participants (corrected): Master Adjuster (identity/firm TBD); Martin Kofman; Evan Katz; Chris Roussis (present — confirmed); Christian Gray; Julian Rivera — presence to be verified. Alex Morales not present at B.2.

Context: Dec 18, 2019 declination (WT-103) falls shortly after this visit.

As-reported notes: Pre-walk briefing re characterization of tenant-owned fixtures; master adjuster recognized a professional studio (referenced prior Electric Ladyland inspection; “no doubt” about professional-studio status; noted visible pro-grade features).

Tier-1 discovery: Master Adjuster identity/firm; report/photos/notes; Kofman↔Katz pre-meeting comms; claim-file handling of fixture ownership/valuation; **Rivera presence** verification.

B.3 — Meeting #3 — Feb 26, 2020 (Post-Carrier Claim-Approval Walkthrough / Mold Scope — as reported)

Participants: Evan Katz (Power Adjustment); Julian Rivera (Total Restoration, Inc.); Christian Gray; Alex Morales possible.

Sequence (as reported; verification required):

- **Hallway (Studios 1 & 2 corridor): Approval disclosure (as reported):** the insurer had **approved** the landlord’s Studios 1 & 2 **property-damage claim for a full settlement amount; disbursement status/date unknown** (to be established in discovery). Katz then reprimanded Rivera for mentioning it in front of the tenant.

- **Minutes later — Kitchen:** Katz stated **“padded the numbers.”** Rivera was present.

Tier-1 discovery: Rivera formal statement; Gray corroboration; **carrier approval record & payout ledger** (date/amount/payee); Power Adjustment claim file (valuations/worksheets); TRI **Feb 26** job file (scope notes, photos, scheduling comms).

3) Participant Directory (as documented)

- **Chris (Christopher) Roussis — Total Restoration, Inc. — B.0 (with Gray); B.2 (confirmed); B.1 presence to be established.**
 - **Julian Rivera — Total Restoration, Inc. — B.3 (present); B.2 presence to be verified; B.1 presence to be established.**
 - **Evan Katz — Power Adjustment — B.1; B.2; B.3.**
 - **Master Adjuster — (Carrier/IA firm) — B.2 (identity TBD).**
 - **Alex Morales — (Affiliation TBD) — B.3 possible (not present at B.2).**
 - **Martin Kofman — American Package Co. — B.1; B.2.**
 - **Christian Gray — Tenant (G21) — B.1; B.2; B.3.**
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4) Reported Statements & Observations (for exhibit preparation)

All items below are “as reported” and require verification. Page-pinpoints within this attachment will be assigned once WT-104 Bates sub-ranges are finalized.

- **Landlord — Martin Kofman (pre-B.2 brief):** “When the adjuster comes, don’t mention that you built all this... We need to get the maximum insurance payment to fix everything.” (*words to that effect*)
- **Insurance Adjuster — Evan Katz:**
 - **B.1 (Dec 11):** “Items were moved to make it look like something was being done.”
 - **B.3 (Feb 26; kitchen):** “Padded the numbers.”

- **Contractor — Julian Rivera (B.3 hallway): Approval disclosure (as reported):** the insurer had approved the landlord's Studios 1 & 2 property-damage claim for a full settlement amount; payout status/date unknown (to be established in discovery).
 - **Master Adjuster (B.2 walkthrough):** Immediate recognition of professional studio; prior Electric Ladyland reference; "no doubt" on professional status; noted visible pro-grade features.
 - **Tenant — Christian Gray:** Refusal to participate in non-disclosure of tenant-built fixtures (pre-B.2 brief); voiced objection.
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5) External Anchors & Cross-References (by tab/record)

- **WT-102 — Email to Counsel (2019-12-03)** (*pre-meeting memorialization; ownership/non-disclosure theme*).
 - **Landlord email — Nov 22, 2019 (American Package Co., Violet Lautan):** Monday access request (**likely Nov 25**).
 - **WT-103 — Declination (2019-12-18)** (*situates B.2 temporally*).
 - **WT-201 (Katz), WT-202 (Rivera), WT-203 (Roussis)** — witness profiles aligned to B.0–B.3.
 - **WT-001 (Master Timeline); WT-002 (Witness Directory); WT-003 (Collection Tracker).**
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6) Collection Targets (aligned to WT-003)

Tier-1 — Critical

- **Master Adjuster identity & inspection records (B.2)** — report, photos, notes.
- **Kofman ↔ Katz comms (Nov–Dec 2019)** — fixture characterization / non-disclosure brief.
- **Power Adjustment claim file** — fixture characterization; valuation worksheets; recipients; comparison to "padded" remark.
- **Carrier approval record & payout ledger** — Studios 1 & 2 (date/amount/payee).
- **Formal statements** — Roussis (B.0/B.2); Rivera (B.3); Gray corroboration.

High Priority

- **Julian Rivera presence (B.2) — verify; Alex Morales (B.3 possible) — identify/affiliation.**
- **TRI project files — B.0/B.1/B.3 scheduling; moisture logs; B.0 drawings/specs (explicit full demo); estimates; photos; TRI↔PA and TRI↔landlord comms.**

Processing (mechanical)

- Page-pinpoint pass (once pagination fixed).
- WT-104 Bates sub-range mapping by section.
- Dec 5, 2019 coordination email collection.

7) Changes From Prior Attachment (Errata Summary)

1. **B.3 caption & context: "Post-Payment" → "Post-Carrier Claim-Approval (as reported); disbursement unknown."**
2. **B.0 participants: "Solo" removed; tenant (Christian Gray) added.**
3. **B.1 participants: normalized to Katz; Gray; TR representative — Roussis and/or Rivera (presence to be established); Kofman possible at beginning (to be established), and explicit day-separation from B.2.**
4. **B.2 participants: Roussis present (confirmed); Rivera presence to be verified; Alex Morales not present (moved to B.3 "possible").**
5. **B.3 hallway phrasing: payout-implying quote replaced with approval-only (as reported) wording + payout unknown note.**
6. **Participant Directory: synchronized with items 2–4 above.**
7. **WT-102 anchor note: align the email date label to the canonical 2019-12-03 (and treat 2020-01-22 as the separate EML header anchor), replacing "Jan 21, 2020" where necessary.**

YAML footer (optional in PDF properties)

- **version: v2.1 (WHITE)**

- **last_updated:** 2025-11-11
 - **inference_lock:** false
 - **alignment:** WT-104 (B.0–B.3 corrections); WT-201/202/203; WT-301/302
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