

STATE OF NORTH CAROLINA
COUNTY OF WAKE

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IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

WAKE COUNTY, C.S.C.

File No. 09 CVS 09519

STATE OF NORTH CAROLINA,
ex rel. ROY COOPER, ATTORNEY
GENERAL,

Plaintiff,

v.

ANNA KONEVSKY, individually and in
her capacity as agent and officer of both
LOCKSMITH, INC. and NC CHARLOTTE
LOCKSMITH, INC., *et al.*,

Defendants.

BY _____

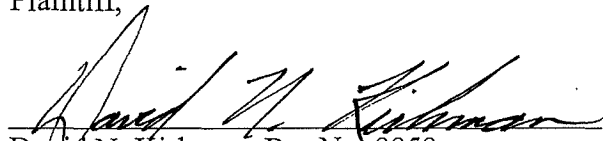
AFFIDAVIT OF LEE A. DENNEY

Plaintiff herewith files the attached Affidavit of Lee A. Denney, Investigator for the North Carolina Locksmith Licensing Board, in support of its motions for Default Judgment and Summary Judgment against the various defendants herein.

This the 17th day of August, 2010.

STATE OF NORTH CAROLINA, *ex rel.*
ROY COOPER, ATTORNEY GENERAL,
Plaintiff,

By:



David N. Kirkman, Bar No. 8858
Assistant Attorney General
CONSUMER PROTECTION DIVISION
North Carolina Department of Justice
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STATE OF NORTH CAROLINA

COUNTY OF WAKE

AFFIDAVIT OF LEE A. DENNEY

I, Lee A. Denney being first duly sworn, state the following:

1. I am a licensed private investigator, license #422, issued in 1974. Prior to 1974 I was a criminal investigator for the U.S. Army.
2. My office is located in Raleigh, NC.
3. In August, 2009, the NC Locksmith Licensing Board retained my investigative services to investigate unlicensed and illegal locksmith activity in North Carolina.
4. During the past 12 months I have been investigating what I would call a "Gang" of people, mostly identified as Israelis, operating illegal/unlicensed locksmith businesses out of the Charlotte, NC area.
5. Several persons have come to my attention that are all connected together through various means. These persons include Lior Dangoor, Tamir Avraham, Alik Galchenko, Eli Raz and Boaz Sultani. None of these persons are licensed locksmiths.
6. During the course of my Charlotte investigations I have traced approximately 24 phone numbers, checked out approximately 12 residences and done license tag/vehicle title searches on approximately 12 vehicles. These same names are always coming up when I have done these searches.
7. Concerning 704 Locksmith, my investigation has revealed that there is a current website for 704 Locksmith. The website gives an address of 420 W. Fifth Street, Charlotte, NC 28202. This is a bogus address. A large building and parking deck are under construction at this location, which is in downtown Charlotte.
8. The 704 website phone number, 704-393-9039, traces to Karen Mount, 6732 West Coalmine Avenue, Suite 234, Littleton, CO. Karen Mount has 119 other phone numbers and 6 virtual extensions. Karen Mount is behind three businesses. One is "Everywhere Solutions" and one is "Seabound Webs.com". These two businesses design websites and appear to specialize in locksmith websites. The third business is "Solutions Call Center". It is my belief that this is a "call center" for the many phone numbers connected to these websites. These three businesses are behind the websites of the following NC illegal locksmith advertisements:

704 Locksmith
Charlotte Locksmith 28280
24/7 Locksmith Everywhere
Charlotte Locksmith
Nccharlottelocksmith

9. My investigation found that Anna P Konevsky and Lior Dangoor are still listed as the owners of 2549 Lynbridge Drive, Charlotte, NC 28226. Property Tax Records show this residence in both names with a tax value of \$259,900. Lior Dangoor and Anna Konevsky (a/k/a Anna Dangoor) are married. Lior Dangoor has been identified as one of the persons behind Zip Locksmith and according to an informant has taken over the advertising for Open Sky Key Locksmith from Boaz Sultani. I have an active arrest warrant out for Dangoor charging him with doing locksmith work without a license under the name Zip Locksmith.

10. My investigation revealed that Tamir Avraham resides at 8736 Cinnabay Drive, Charlotte, NC 28216. This is one of several houses owned at least in part by Boaz Sultani. DMV records show that Avraham obtained a 2003 Dodge Caravan from Alik Galchenko and a 2002 Dodge Caravan that was owned by Open Sky Key from Sultani. Both of Avraham's vans have been observed at the residence of Eli Raz, a close person to Boaz Sultani and co-owner of two houses with Sultani. Avraham's name has been connected to the following locksmith businesses:

704
Locksmith Services, Inc

11. My investigation has found that Alik Galchenko has two different addresses. One is 118 Sawyer Circle, Apt 408, Memphis, TN 38103. The second address according to DMV is 9249 Kimmel Lane, Charlotte, NC 28216. This residence is owned by Boaz Sultani, Sagiv Sok-Ram & Eli Raz.

12. I found numerous phone numbers from locksmith ads placed in phone books and Craig's listings for locksmith services were traced to Galchenko at the Tennessee address. Galchenko is linked to Avraham through a vehicle transfer. He is linked to the following locksmith advertisements/businesses:

Anytime Locksmith
Several Craig's List ads for "Charlotte Locksmith"
704 Locksmith (note SOS filing dtd 9-14-09 lists "Alik Galc as owner of
704 Locksmith Inc.)

13. My investigation into a Raleigh Phone Book locksmith advertisement led to Boaz Sultani, 10304 Friarsgate Rd, Huntersville, NC 28078. Sultani was found to be linked to the following persons by way of advertising, phone numbers, vehicles and residence ownership:

Tamir Avraham
Anna Konevsky & Lior Dangoor
Alik Galchenko

Eli Raz
Sagiv Zok-Ram
Stav Krok
Reem Shai

14. My investigation has found that Boaz Sultani is behind Phillips Locks & Locksmith. He created Sky Key, LLC, and then changed the name to Open Sky Key, a locksmith business, which was dissolved on 3-24-08. A Dodge Caravan is still titled to Open Sky Key & has been seen at a house he has partial ownership in. The vehicle is operated by Sagiv Zok-Ram. I have developed an informant that states Lior Dangoor now pays for the advertising for Open Sky Key.

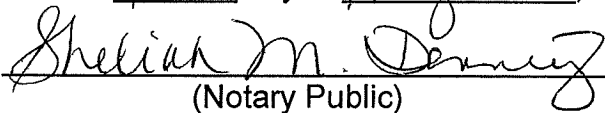
15. Eli Raz's name has been connected to the phone numbers of Phillips Lock and Key, an illegal locksmith operation believed to be run by Boaz Sultani. Eli Raz co-owns two houses with Sultani and has been involved in several corporations or LLC's that Sultani sets up and then closes. Eli Raz has a pending criminal charge in court and has admitted doing unlicensed locksmith work for A1A Locksmith based in Raleigh.



LEE A. DENNEY

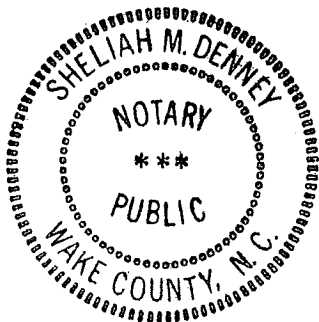
Sworn to and subscribed before me

this the 14th day of August, 2010.



(Notary Public)

My Commission Expires June 26, 2013



CERTIFICATE OF SERVICE

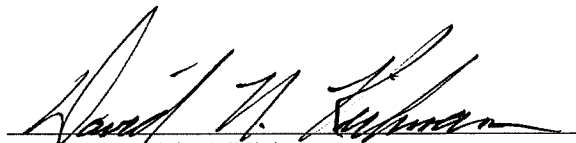
The undersigned attorney for plaintiff hereby certifies that he has today served copies of the foregoing Affidavit upon defendants by depositing copies of the same into the care and custody of the United States Postal Service in an envelope bearing sufficient First Class Postage, addressed as follows:

Anna Konevsky
704 Locksmith, Inc.
NC Charlotte Locksmith, Inc.
2549 Lynbridge Drive
Charlotte, NC 28226

and

Tamir Avraham
Locksmith Services, Inc.
8736 Cinnabay Drive
Charlotte, NC 28216

This the 17th day of August, 2010.


David N. Kirkman