

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

ANDREW HALL,

Plaintiff,

v.

LORETTANN GASCARD and NIKOLAS GASCARD,

Defendants.

Docket No. 1:16-cv-00418-SM

**DECLARATION OF CHARLES MCLAUGHLIN**

I, the undersigned, Charles McLaughlin, do hereby depose and state as follows:

1. I am a professional private investigator with 26 years of experience in the industry. I founded McLaughlin Investigative Group in 1999 and a nationwide pre-employment-screening firm, EmploySecure.com, in 2006. I am the immediate past-chairman and a past-president of the World Association of Detectives. I have extensive experience in locating and interviewing witnesses and have testified in state and federal courts.

2. On November 8, 2016, I was hired by the plaintiff in this matter to locate and serve the defendants.

3. I began my search by running extensive database searches on each defendant through two subscription databases, TLO (a TransUnion search and locating technology) and Tracers Information, the New Hampshire Secretary of State's records, and a social media database called Skopenow.com. I found the addresses listed in the Complaint, 348 Route 202, Rindge, New Hampshire and 56 Concord Road, Peterborough, New Hampshire. The New Hampshire Secretary of State's records revealed a New Hampshire LLC called Brandwink that

was formed by Nikolas Gascard in 2014. He last filed an annual report on March 10, 2016. The LLC again led me to 348 Route 202 in Rindge.

4. I spoke with a detective in Rindge who was unable to provide any other addresses for the defendants. The current tenant at 348 Route 202 in Rindge had no knowledge of either defendant.

5. The current occupant at 56 Concord Street in Peterborough stated that he had lived in the residence for a few years and did not know the defendants.

6. The plaintiff's counsel provided me with a potential alternate address in Worcester, Massachusetts. It is a multi-family home. Neither defendant's name appears on any of the mailboxes. A current tenant who has lived there for approximately ten years has never heard of either defendant.

7. I have thus far been unable to locate the defendants and currently possess no information that could form the basis of any additional searches.

8. This declaration is submitted in support of the Motion to Permit Service by Publication.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 12, 2016

/s/ Charles McLaughlin  
Charles McLaughlin