

**AFFIDAVIT IN SUPPORT OF MOTION FOR ENTRY OF JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Thomas J. Coughlin, declare under penalty of perjury that the following statements are true and correct. The following statements are based on my personal knowledge based on my direct communications and interactions with the defendant, Andrew A. Vogel, and based on my knowledge and experience as a dealer in antiques and fine art. I am competent to testify on the matters stated below.

1. I am the sole member-manager of Thomas J. Coughlin Handmade European Furniture, LLC.

2. I have operated my own business of selling antiques, rare collectibles, and handmade furniture for more than fifty years. During that time, I have purchased and sold tens of thousands of such items.

3. One set of specialty items I have acquired is a selection of original Guinness art by John Gilroy, who was an in-house artist for Guinness Beer of Dublin from 1932 to 1956. These are the items I provided to Andrew A. Vogel on a consignment basis. Having sold more than three hundred such items, I am intimately familiar with the wholesale and retail values of each piece.

4. Between February 2011 and March 2015, I provided the following items to Andrew A. Vogel. Those items had, and continues to have, the values identified the following table:

Item No.	Description	Retail Value
12-0211	Guinness – Rolled Artist Proof – Ostrich & Zookeeper	\$ 1850 <sup>-</sup>
	Wall Section – Maison Eugene 53x26	\$ 1400
12-1211	Guinness Sign – Stranger Bar 28x42	\$ 2300
	French Vineyard sign Hermitage	\$ 1875
07-0112	British Locomotive – Johnnie Walker – 41x17	\$ 1800
	French Wine Barrels (A, B, C, D)	\$ 1600 ea
06-1212	French Champagne – Joseph Perrier	\$ 2500
13-0513	Sailor Coming Ashore with Load of Tropical Fruit	\$ 2400
14-0513	Fisherman in Boat Full of Fish	\$ 2400
19-1213	Guinness Time, Clock and Smiling Beer Glass	\$ 2400
29-0813	Guinness – Golf – Tralee	\$ 2400
26-0813	Guinness – Golf – Lehinch	\$ 5,500
1-1213	Guinness – Theatre Carnegie – Lady	\$ 4400
21-1213	Guinness – Zookeeper Series – Ostrich	\$ 2,400
22-1213	Guinness – Zookeeper Series – Seal	\$ 2,400
23-1213	Guinness – Kuala Bear	\$ 2,400
24-1213	Guinness – Penguins	\$ 2,400
24-0114	Guinness – Glen Eagles	\$ 2,750
23-0114	Guinness – Muirfield Golf Club	\$ 2,750
7-0913	Guinness – Toucans & Mt. Rushmore	\$ 2,400
8-0913	Guinness – Monument Valley	\$ 2,400
9-0913	Guinness – Golden Gate Bridge	\$ 2,400
10-0913	Guinness – In Their Nest Agree	\$ 2,400
2-1013	Guinness – Lobsters Love Guinness	\$ 2,400
13-0414	Guinness – Warthog	\$ 2,400
14-0414	Guinness – Warthog on Veld	\$ 2,400
15-0414	Guinness – Hippo Lying	\$ 2,400
16-0414	Guinness – Hippo Running	\$ 2,400
17-0414	Guinness – Walrus Seated	\$ 2,400
18-0414	Guinness – Walrus Running	\$ 2,400

19-0414	Guinness – Panda	\$ 2,400
20-0414	Guinness – St. Bernard	\$ 2,400
21-0414	Guinness – Bull Running	\$ 2,400
22-0414	Guinness – Bull Fight	\$ 2,400
25-0414	Guinness – Golf Landscape	\$ 2,400
26-0414	Guinness – Golf Portrait	\$ 2,400
27-0414	Guinness – Golf by Wm. Brearly	\$ 2,400
23-0414	Guinness – Toucans & U.S. Flag	\$ 3,200
24-0414	Guinness – Toucans & U.S. Map	\$ 3,200
01-714 – 14-714	Folio of 14 Cars for Guinness American Promotion	\$ 42,000
12-0813	Guinness – Battle of Hastings	\$ 6,500
<b>TOTAL:</b>		\$ 150,825

5. Andrew A. Vogel has failed to return any of the above items, despite my demands that he do so. In August 2014, Mr. Vogel admitted that he sold most of the items but retained the proceeds for himself.

6. Mr. Vogel induced me to continue supplying items following his August 2014 admission, by returning a few items and making some consignment payments. However, he never returned the above items or made payment.

  
Thomas J. Coughlin  
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Executed on September 24, 2017.