

**Explanation of documents submitted** /supporting documents that the apartment existed before April 1, 1995.

Affidavit from Edgar Gatto

Affidavit from Karen Norberg

Affidavit from David Norberg

Affidavit and phone records from David Perkins

Been Verified document showing that Michael Delaney was a tenant at 38 Portland St.

White pages document showing that Michael Delaney was a tenant at 38 Portland St for a period of time beginning August 1986.

Photos of the interior of apartment showing building materials that date before 1995.