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IN RE: KOLLEL MATEH EFRAIM, LLC

ABRAHAM STEINWURZEL - 3/28/08

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CONCORDANCE AND CONDENSED TRANSCRIPT  
PREPARED BY:

*Ellen Grauer*  
**COURT REPORTING**



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TOWER 56, 126 EAST 56TH STREET, FIFTH FLOOR, NEW YORK, NEW YORK 10022

PHONE: (212) 750-6434 FAX: (212) 750-1097

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Page 1

(1) UNITED STATES DISTRICT COURT  
(2) SOUTHERN DISTRICT OF NEW YORK  
-----  
(3) In Re  
(4) KOLLEL MATEH EFRAIM, LLC, a/k/a  
MATEH EFRAIM LLC, a/k/a  
(5) KOLEL MATEH EFRAIM,  
(6) Debtor.  
Chapter 7  
(7) Case No. 04-16410 (SMB)  
-----x  
(8)  
(9) Bryan Cave  
1290 Avenue of the Americas  
New York, New York  
(10)  
(11)  
(12) March 28, 2008  
10:10 a.m.  
(13)  
(14)  
(15) Deposition of ABRAHAM STEINWURZEL,  
(16) before Marlene Lee, CSR, CRR, a Notary Public  
(17) of the State of New York.  
(18)  
(19)  
(20)  
(21)  
(22)  
(23) ELLEN GRAUER COURT REPORTING CO. LLC  
126 East 56th Street, Fifth Floor  
(24) New York, New York 10022  
212-750-6434  
(25) REF: 87142

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(1) ----- I N D E X -----  
(2) WITNESS EXAMINATION BY PAGE  
(3) ABRAHAM STEINWURZEL MR. WOLF 5  
(4)  
(5)  
(6) ----- DOCUMENT REQUESTS -----  
(7) PAGE 127 COPIES OF THE BANK STATEMENTS AND  
OF THE CHECKS FROM EACH OF THOSE  
(8) ACCOUNTS FOR THE PERIOD JANUARY  
1, 2004 THROUGH DECEMBER 31, 2007  
(9)  
128 COPIES OF THE BANK STATEMENTS FROM  
(10) EACH OF THOSE ACCOUNTS AND OF THE  
CHECKS DRAWN ON THOSE ACCOUNTS FOR  
(11) JANUARY 1, 2004 THROUGH DECEMBER  
31, 2007  
(12)  
136 COPIES OF THE BANK ACCOUNTS AND  
(13) COPIES OF THE CHECKS  
(14)  
(15)  
(16) ----- INFORMATION REQUESTED -----  
(17) PAGE 48 NAME AND ADDRESS OF ANYONE ELSE WHOM  
YOU RECALL WAS INVOLVED IN THE  
(18) NEGOTIATIONS BY WHICH THE RELIGIOUS  
CORPORATION ACQUIRED THE BUILDING  
(19) AND/OR WAS INVOLVED IN SOLICITING  
DONATIONS TO THE RELIGIOUS  
CORPORATION TO ACQUIRE THE BUILDING  
(20) NAME OF CONSTRUCTION COMPANY THAT  
(21) FIXED THE ROOF  
(22)  
(23)  
(24)  
(25)

Page 2

(1) A P P E A R A N C E S :  
(2)  
(3) BRYAN CAVE LLP  
(4) Attorneys for the Trustee  
(5) 1290 Avenue of the Americas  
(6) New York, New York 10104-3300  
(7) BY: ROBERT A. WOLF, ESQ.  
(8) CHRIS M. LaROCCO, ESQ.  
(9) 212-541-3163 (Telephone)  
(10) chris.larocco@bryancave.com (E-mail)  
(11) 212-541-1343 (Fax)  
(12)  
(13)  
(14) ALSO PRESENT:  
(15) VINAY AGARWAL  
(16)  
(17)  
(18)  
(19)  
(20)  
(21)  
(22)  
(23)  
(24)  
(25)

Page 4

(1) ----- E X H I B I T S -----  
(2) TRUSTEE DESCRIPTION PAGE  
(3) EXHIBIT 24 ORDER 6  
(4) EXHIBIT 25 COMPUTER-GENERATED BANK  
ACCOUNT STATEMENT, 2006,  
(5) ASTORIA FEDERAL SAVINGS,  
ACCOUNT NO. 9001047470  
(6)  
(7)  
(8)  
(9)  
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(23)  
(24)  
(25)

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(1) ABRAHAM STEINWURZEL,  
(2) having been called as a witness and duly  
(3) affirmed by the notary (Marlene Lee), was  
(4) examined and testified as follows:  
(5) EXAMINATION BY  
(6) **MR. WOLF:**  
(7) **Q.** Rabbi, do you need another minute?  
(8) **A. No. No. I can answer everything.**  
(9) **Q.** Are we ready to go? You're in the  
(10) middle of an examination. I ask if you could  
(11) put your books to the side because this is an  
(12) exam.  
(13) Thank you.  
(14) **Q.** Rabbi, as I believe you know, my  
(15) firm represents Robert L. Geltzer, who is the  
(16) Chapter 7 Trustee of the named Debtor in a  
(17) bankruptcy proceeding pending in the United  
(18) States Bankruptcy Court for the Southern  
(19) District of New York, that named Debtor being  
(20) Kollel Mateh Efraim, also known as Kollel Mateh  
(21) Efraim, LLC, also known as Kolel Mateh Efraim.  
(22) This is an examination conducted  
(23) pursuant to Rule 2004 of the Federal Rules of  
(24) bankruptcy procedure as ordered by the  
(25) Bankruptcy Court in the bankruptcy case I just

Page 7

(1)  
(2) rules of this examination. Obviously I'm going  
(3) to be asking you a series of questions. In  
(4) response to each question you need to give a  
(5) verbal answer. A shake of the head or of the  
(6) hands cannot be transcribed by this reporter  
(7) who is here. I ask for a verbal response.  
(8) If you don't understand a question  
(9) I ask, please let me know that and I'll try to  
(10) rephrase the question so you can give a  
(11) response.  
(12) You have the right to have an  
(13) attorney present, as we've advised you in the  
(14) past. And indeed, you had indicated to us, had  
(15) you not, that an attorney named Gary Ginsburg  
(16) was going to represent you at this examination;  
(17) is that correct?  
(18) **A. Yes. I thought he would come, but  
he didn't come.**  
(19) **Q.** But you understand you do have the  
(20) right to have an attorney representing you  
(21) here.  
(22) **A. I understand.**  
(23) **Q.** Are you waiving that right?  
(24) **A. I'm waiving the right, unless I'll**

Page 6

(1)  
(2) mentioned. The order is dated January 31,  
(3) 2008.  
(4) I'm going to, at this point, ask  
(5) the reporter to mark a copy of the order as  
(6) Trustee Exhibit 24. We've already had one  
(7) examination in this Bankruptcy Court. We've  
(8) marked through Exhibit 23. We're going to  
(9) sequentially number them, starting with the No.  
(10) 24.  
(11) **(Trustee Exhibit 24 for  
identification, order.)**  
(12) **Q.** Rabbi, have you ever had your  
(13) deposition taken in any lawsuit?  
(14) **A. I had one time. They thought I was  
a witness, then they thought I wasn't. For  
some trip-and-fall case. Somebody fell in the  
street.**  
(15) **Q.** Other than that, have you ever had  
(16) your deposition taken?  
(17) **A. No.**  
(18) **Q.** Have you ever had your deposition  
(19) taken in a bankruptcy case?  
(20) **A. Never.**  
(21) **Q.** Let me very quickly go over the

Page 8

(1)  
(2) **have some questions I don't understand, I'll  
have to consult an attorney. But as of now,  
whatever you want to ask, you can ask.**  
(3) **Q.** Very good. I will ask you to let  
(4) me finish asking each question before you  
(5) answer so the reporter can transcribe my full  
(6) question and so you can hear it.  
(7) Let me ask you just a couple of  
(8) things that I ask of any witness in an  
(9) examination or deposition. Are you on any  
(10) medication that may affect your ability to  
(11) testify completely and truthfully today?  
(12) **A. No.**  
(13) **Q.** Do you have any medical or other  
(14) condition that may affect your ability to  
(15) testify completely and truthfully?  
(16) **A. No.**  
(17) **Q.** Are you taking any substance or are  
(18) you under the influence of any substance that  
(19) would prevent you from testifying completely  
(20) and truthfully today?  
(21) **A. No.**  
(22) **Q.** I may be showing you some documents  
(23) during the course of this examination. Do you

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- (1)
- (2) have any condition which would affect your
- (3) ability to read those documents?
- (4) **A. No.**
- (5) **Q.** You have seen, have you not, a copy
- (6) of what has now been marked as Trustee Exhibit
- (7) 24? That's a copy of the order I referred to
- (8) before that authorized the trustee to take your
- (9) examination in this bankruptcy case and
- (10) requiring you to produce certain documents.
- (11) **A. Okay.**
- (12) **Q.** Have you seen that before?
- (13) **A. Yes. Someone gave it to me.**
- (14) **Q.** I'm sorry. Who gave it to you?
- (15) **A. Somebody came by my house and gave**
- (16) **it to me. Or it was mailed.**
- (17) **Q.** You're referring to a process
- (18) server? Somebody came to serve it?
- (19) **A. Yes.**
- (20) **Q.** Other than with your intended
- (21) attorney, have you had any conversations or
- (22) discussions with anyone about this examination
- (23) today?
- (24) **A. No.**
- (25) **Q.** Did you have any discussions about

Page 11

- (1)
- (2) searched for any such documents?
- (3) **A. I searched but I have nothing to**
- (4) **search. There's nothing there. All the**
- (5) **documents were given to the attorneys way past.**
- (6) **Q.** Did you at any time give any
- (7) documents that fall within the categories in
- (8) the order to any attorneys?
- (9) **A. I didn't keep any documents. All**
- (10) **the documents were just in the office upstate.**
- (11) **Maybe Jack Lefkowitz had them. I never had any**
- (12) **documents --**
- (13) **Q.** I'm sorry?
- (14) **A. -- kept by myself.**
- (15) **Q.** When you say "the office," what
- (16) office are you talking about?
- (17) **A. Office in the Meadows. Documents**
- (18) **of records were in the office.**
- (19) **Q.** And was there also an office of the
- (20) Debtor somewhere in New York City?
- (21) **A. Who is the Debtor?**
- (22) **Q.** The Debtor I mentioned before, in
- (23) this paper.
- (24) **A. The LLC?**
- (25) **Q.** Yes.

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- (1)
- (2) it with Mr. Jack Lefkowitz?
- (3) **A. Not prior to this; I may have to**
- (4) **testify.**
- (5) **Q.** He told you, you have to testify?
- (6) **A. Yes.**
- (7) **Q.** When did he tell you that?
- (8) **A. Some time ago.**
- (9) **Q.** Did he tell you he had had his
- (10) examination taken in this bankruptcy case?
- (11) **A. Possibly.**
- (12) **Q.** Did he discuss with you any of the
- (13) questions that were asked of him at that
- (14) examination?
- (15) **A. No.**
- (16) **Q.** Did he discuss with you at any time
- (17) any of the answers he gave at the examination?
- (18) **A. If there's no questions, there's no**
- (19) **answers.**
- (20) **Q.** Maybe. Maybe not. I take that as
- (21) a "no"?
- (22) **A. No.**
- (23) **Q.** This order, Trustee's Exhibit 24,
- (24) required you to produce certain documents to us
- (25) that are enumerated on pages 2 and 3. Have you

Page 12

- (1)
- (2) **A. You know, I never go to LLC. I**
- (3) **don't have -- I don't keep any records of LLC.**
- (4) **You would have to ask Jack if he has anything.**
- (5) **Q.** Did you at any time have possession
- (6) of any such records?
- (7) **A. If someone gave me a bill, I would**
- (8) **hand it over and give it away. But I have no**
- (9) **reason to storage it myself.**
- (10) **Q.** When you said someone would give
- (11) you a bill, you hand it over; hand it over to
- (12) whom?
- (13) **A. To the office. Whoever was taking**
- (14) **care of the bills would take care.**
- (15) **Q.** Which office are you speaking of
- (16) now?
- (17) **A. Upstate. Upstate.**
- (18) **Q.** Did you at times occupy that
- (19) office?
- (20) **A. I went into the office, but it**
- (21) **wasn't my office. But I went into office**
- (22) **sometimes.**
- (23) **Q.** Whose office was it?
- (24) **A. There was someone there. Mark**
- (25) **Turkeltaub was there. It wasn't a very busy**

- (1)
- (2) **office. It was just open. There was a desk**
- (3) **there. I put down the bill. Things got done.**
- (4) **Q. Was this office located on the**
- (5) **grounds of what used to be known as the Meadows**
- (6) **Resort?**
- (7) **A. Yes.**
- (8) **Q. In Cocheckton, New York?**
- (9) **A. Yes.**
- (10) **Q. When is the last time you ever went**
- (11) **to that office?**
- (12) **A. To that office? In the summer this**
- (13) **year.**
- (14) **Q. Which summer?**
- (15) **A. Last summer.**
- (16) **Q. Summer of 2007?**
- (17) **A. Yes.**
- (18) **Q. Was that a time when a camp was**
- (19) **being operated there?**
- (20) **A. There was a camp, yes.**
- (21) **Q. Was the last time that you were on**
- (22) **the premises – I'll call it Meadow premises**
- (23) **for now. Was the last time that you were on**
- (24) **the Meadows premises sometime after the camp**
- (25) **ceased to operate for the summer of 2007?**

- (1)
- (2) **A. No. I left the last day of camp.**
- (3) **Q. What was the last day of that camp?**
- (4) **A. Sometime in August. In late**
- (5) **August. Last days in August.**
- (6) **Q. Did you live up at those premises**
- (7) **on the grounds where the camp was operated**
- (8) **during the summer of 2007?**
- (9) **A. Yes.**
- (10) **Q. In which building?**
- (11) **A. It's a white old building close to**
- (12) **the entrance. It's a big – the oldest**
- (13) **building there.**
- (14) **Q. How many stories?**
- (15) **A. Two stories.**
- (16) **Q. Is that the building in which the**
- (17) **care-givers of the property also lived?**
- (18) **A. No.**
- (19) **Q. The building I just mentioned where**
- (20) **the care-givers lived, that's where the office**
- (21) **was; correct?**
- (22) **A. Yes.**
- (23) **Q. Was the building that you lived in**
- (24) **over the summer the same building that the**
- (25) **campers lived in?**

- (1)
- (2) **A. No.**
- (3) **Q. Was it the same building in which**
- (4) **certain staff people for the camp lived in?**
- (5) **A. Yes.**
- (6) **Q. Did you review any documents in**
- (7) **preparation for this examination today?**
- (8) **A. No.**
- (9) **Q. Rabbi Steinwurzel, I want to ask**
- (10) **some basic background questions of you. Could**
- (11) **you first tell me your date of birth?**
- (12) **A. July 12th, '57.**
- (13) **Q. '57?**
- (14) **A. Yes.**
- (15) **Q. I'd like to ask you briefly about**
- (16) **your educational background. Do you have a**
- (17) **college degree?**
- (18) **A. Rabbinical college.**
- (19) **Q. Which rabbinical college?**
- (20) **A. Torah Vodath and Beth Medrash**
- (21) **Govoah.**
- (22) **Q. Because we're transcribing in**
- (23) **English, I'm going to ask if you could spell**
- (24) **the names you just mentioned for the reporter.**
- (25) **A. T-O-R-A-H, V-O-D-A-T-H.**

- (1)
- (2) **Q. I'm sorry. The other college?**
- (3) **A. B-E-T-H, M-E-D-R-A-S-H,**
- (4) **G-O-V-O-A-H.**
- (5) **Q. During what years did you attend**
- (6) **Torah Vodath?**
- (7) **A. I had my full education from --**
- (8) **when I was in elementary school. So I was**
- (9) **there from about '62, for 15 years, till '69,**
- (10) **'70.**
- (11) **Q. I thought you said 15 years.**
- (12) **A. '52 -- I said from '62 until '75 --**
- (13) **'76. Yeah.**
- (14) **Q. And then when did you attend Beth**
- (15) **Medrash Govoah?**
- (16) **A. Yes. I studied in Israel a year**
- (17) **and came back and went to Medrash Govoah.**
- (18) **Three years.**
- (19) **Q. How long did you study in Israel?**
- (20) **A. One year.**
- (21) **Q. Are you ordained as a rabbi?**
- (22) **A. Yes.**
- (23) **Q. By which body?**
- (24) **A. By Torah Vodath.**
- (25) **Q. Other than a driver's license, do**

- (1)
- (2) you hold any licenses?
- (3) **A. I don't have a driver's license.**
- (4) **Q.** For example, do you have a real
- (5) estate broker's license?
- (6) **A. No.**
- (7) **Q.** Salesperson's license?
- (8) **A. No.**
- (9) **Q.** Any license at all?
- (10) **A. No.**
- (11) **Q.** Are you currently married?
- (12) **A. Yes.**
- (13) **Q.** What is the name of your wife?
- (14) **A. Sarah. S-A-R-A-H. Either with or**
- (15) **without an "H," because --**
- (16) **Q.** Do you have any children?
- (17) **A. Yes.**
- (18) **Q.** How many?
- (19) **A. Fourteen.**
- (20) **Q.** Could you just give me the range of
- (21) their ages?
- (22) **A. One year old up to 24.**
- (23) **Twenty-five. I'm not sure.**
- (24) **Q.** I won't tell the older one.
- (25) **A. Okay.**

- (1)
- (2) **Q.** Where do you presently live?
- (3) **A. 1264 56th Street.**
- (4) **Q.** In Borough Park, Brooklyn?
- (5) **A. Yes.**
- (6) **Q.** How long have you lived at that
- (7) address?
- (8) **A. Eighteen years.**
- (9) **Q.** Do you own that house?
- (10) **A. Yes.**
- (11) **Q.** Is it in just your name? Or you
- (12) and your wife's name?
- (13) **A. My wife.**
- (14) **Q.** The two of you?
- (15) **A. Yes. It's in a trust, like -- my**
- (16) **father-in-law. It's for the children. The**
- (17) **family.**
- (18) **Q.** Let me ask you this: If I looked at
- (19) the deed, the legal document to the property,
- (20) who would be listed as the present owner of
- (21) that property?
- (22) **A. It's a trust.**
- (23) **Q.** Could you tell me the name of the
- (24) trust?
- (25) **A. Karen Yeushyu.**

- (1)
- (2) **Q.** K-A-R-E-N?
- (3) **A. K-A-R-E-N, Y-E- --**
- (4) **Q.** As best you can.
- (5) **A. Y-E-U-S-H-Y-U. Something like**
- (6) **that.**
- (7) **Q.** Trust?
- (8) **A. Trust.**
- (9) **Q.** Ever since you've been living in
- (10) that home, the ownership name has been that
- (11) trust?
- (12) **A. Yes.**
- (13) **Q.** Is that someone's name?
- (14) **A. No.**
- (15) **Q.** It's a Hebrew name; correct?
- (16) **A. Right.**
- (17) **Q.** Could you translate that into
- (18) English?
- (19) **A. It doesn't mean anything.**
- (20) **Q.** Okay. Have you ever personally
- (21) filed for bankruptcy?
- (22) **A. No.**
- (23) **Q.** Has your wife?
- (24) **A. No.**
- (25) **Q.** Has the trust?

- (1)
- (2) **A. No.**
- (3) **Q.** Are you presently employed?
- (4) **A. Yes.**
- (5) **Q.** By whom?
- (6) **A. My -- I'm employed -- does this**
- (7) **portend to this case?**
- (8) **Q.** Yes. I'm allowed to ask general
- (9) background.
- (10) **A. Gamla College.**
- (11) **Q.** G-A-M-L-A?
- (12) **A. Yes.**
- (13) **(Discussion off the record.)**
- (14) **A. Gamla College.**
- (15) **Q.** You give speeches?
- (16) **A. Yes.**
- (17) **Q.** And you receive honorariums for
- (18) those speeches?
- (19) **A. I'm paid.**
- (20) **Q.** And does Gamla College have a
- (21) physical location?
- (22) **A. Yes.**
- (23) **Q.** Where?
- (24) **A. Elm Avenue in Brooklyn.**
- (25) **Q.** Borough Park, also?

Page 21

- (1)
- (2) **A. No. Flatbush.**
- (3) **Q. Are you presently the rabbi of any**
- (4) **congregation?**
- (5) **A. Yes.**
- (6) **Q. Which one or ones?**
- (7) **A. Congregation Kolel Mateh Efraim.**
- (8) **Q. And does that congregation worship**
- (9) **in a synagogue building?**
- (10) **A. Yes.**
- (11) **Q. And where is that building?**
- (12) **A. 5608 13th Avenue.**
- (13) **Q. For how long have you been the**
- (14) **rabbi of that congregation?**
- (15) **A. Fifteen years. Maybe less.**
- (16) **Whatever.**
- (17) **Q. Are you the only rabbi of that**
- (18) **congregation?**
- (19) **A. There are other rabbis, also, but I**
- (20) **say most of the speeches.**
- (21) **Q. Are you the chief rabbi of that**
- (22) **congregation?**
- (23) **A. You can call it chief rabbi. It's**
- (24) **a new title for me. I'm very honored.**
- (25) **Q. Are you the -- what term would you**

Page 23

- (1)
- (2) Corporation, Kolel Mateh Efraim, as the
- (3) Religious Corporation, with a capital R and a
- (4) capital C.
- (5) **A. Yes.**
- (6) **Q. Are you a Trustee of the Religious**
- (7) **Corporation?**
- (8) **A. I am a trustee. I was a trustee**
- (9) **when it was formed. But so many elections.**
- (10) **But I'm still probably a trustee.**
- (11) **Q. When was the Religious Corporation**
- (12) **formed?**
- (13) **A. Years ago. Maybe 19 years ago.**
- (14) **Q. And is there a president of the**
- (15) **Religious Corporation?**
- (16) **A. There's a president. Yeah.**
- (17) **Q. Who is that?**
- (18) **A. Mr. Kleinbart. It's really a**
- (19) **board. There are a bunch of members. They**
- (20) **make decisions.**
- (21) **Q. Are you a member of the board of**
- (22) **trustees of the Religious Corporation at the**
- (23) **present time?**
- (24) **A. I'm not a member now. I don't sit**
- (25) **in on decisions. We have a board of different**

Page 22

- (1)
- (2) use? Are you the senior rabbi? Lead rabbi?
- (3) **A. I say most of the speeches. There**
- (4) **are others that also say speeches. Lectures.**
- (5) **But I say most of them.**
- (6) **Q. When you talk about speeches,**
- (7) **you're also including in that term, sermons?**
- (8) **A. I say sermons and I say lectures.**
- (9) **There are other people that also say lectures.**
- (10) **I'm very honored to be called the chief.**
- (11) **Q. Is your congregation Hasidic?**
- (12) **A. Not Hasidic. It's mixed.**
- (13) **Q. Both Hasidic and Orthodox.**
- (14) **A. Both.**
- (15) **Q. Am I correct that the congregation**
- (16) **is incorporated as a Religious Corporation?**
- (17) **A. Yes.**
- (18) **Q. By the name Kolel Mateh Efraim --**
- (19) **A. Yes.**
- (20) **Q. With the same spelling as that of**
- (21) **the congregation?**
- (22) **A. Yes.**
- (23) **Q. Are you are Trustee -- to make**
- (24) **things easy so we know we're talking about the**
- (25) **same term, I will refer to the Religious**

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- (1)
- (2) **people. A board.**
- (3) **Q. Is Mr. Lefkowitz a member of that**
- (4) **board?**
- (5) **A. No. Never was.**
- (6) **Q. Never was?**
- (7) **A. No.**
- (8) **Q. Has he ever been a member of the**
- (9) **congregation?**
- (10) **A. No.**
- (11) **Q. Other than having been a trustee of**
- (12) **the Religious Corporation, have you ever been**
- (13) **the trustee of any other religious or other**
- (14) **corporation?**
- (15) **A. No.**
- (16) **Q. Have you ever been a member of a**
- (17) **limited liability company?**
- (18) **A. I was a member -- a member, meaning**
- (19) **like a manager, of the Mateh Ephraim LLC in the**
- (20) **summer when there was -- the first summer I was**
- (21) **the manager for it; for the LLC.**
- (22) **Q. Would that have been the summer of**
- (23) **2004?**
- (24) **A. 2004.**
- (25) **Q. And when you say --**

- (1)
- (2) **A. And before, I was -- Jack**
- (3) **Lefkowitz, he told me I should manage it. So I**
- (4) **did something, if that's called manager. I**
- (5) **don't know what becomes a manager.**
- (6) **Q. So you did certain managerial**
- (7) **duties for the LLC even before the summer of**
- (8) **2004.**
- (9) **A. Yes. To help. Whatever there was.**
- (10) **Q. Just so we're clear, Mateh Ephraim**
- (11) **LLC that you just talked about is spelled**
- (12) **M-A-T-E-H, E-P-H-R-A-I-M?**
- (13) **A. I wouldn't be sure.**
- (14) **Q. You're not sure. Okay.**
- (15) **A. I'm not sure.**
- (16) **Q. Let me ask you this: What's the**
- (17) **relationship between the Religious Corporation**
- (18) **and Mateh Ephraim LLC?**
- (19) **A. There is no relationship.**
- (20) **Q. There's no relationship?**
- (21) **A. Not at all.**
- (22) **(Discussion off the record.)**
- (23) **Q. I'm going to put in front of you,**
- (24) **Rabbi, what has previously been marked as**
- (25) **Trustee Exhibit 5. The title on the first page**

- (1)
- (2) the Rabbi for the Debtor, Kollel Mateh Efraim,
- (3) LLC, also known as Mateh Ephraim LLC, also
- (4) known as Kollel Mateh Efraim.
- (5) **A. I don't know these names --**
- (6) **Q. I didn't ask you a question yet.**
- (7) **Hold up. And that's defined as the "Debtor."**
- (8) **Is it correct that you have served**
- (9) **as the rabbi for the limited liability company**
- (10) **known as Mateh Ephraim LLC?**
- (11) **A. In the summer of 2004 the premises**
- (12) **of the Meadows were used by Mateh Ephraim LLC**
- (13) **as a hotel and some other functions. And as I**
- (14) **was the rabbi -- you could call it rabbi.**
- (15) **Manager. More rabbinical management, you could**
- (16) **say. What else? Something to do with the**
- (17) **funds --**
- (18) **Q. Let's stay on this first phrase.**
- (19) **A. Yes. Let me explain to you just**
- (20) **what "rabbi" means. In the kitchen, in the**
- (21) **hotel, we have a lot of laws. Milk with meat.**
- (22) **Kosher. All these things have to be done.**
- (23) **Shabbas eruv. We don't --**
- (24) **(Discussion off the record.)**
- (25) **Q. You mentioned that you did**

- (1)
- (2) of the document is "Affidavit of Abraham
- (3) Steinwurzel in Opposition to the Branch of
- (4) Helen-May Holdings, LLC's Motion to Hold the
- (5) Debtor in Civil Contempt."
- (6) Do you recall signing the original
- (7) of this affidavit?
- (8) **A. In truth, no. But it could be. I**
- (9) **don't remember.**
- (10) **Q. Do you remember submitting an**
- (11) **affidavit in the bankruptcy case?**
- (12) **A. I don't remember.**
- (13) **Q. Let me refer you --**
- (14) **A. I want to just say the truth. I'm**
- (15) **telling right now. If you show me and remind**
- (16) **me, but --**
- (17) **Q. I want you to state the truth all**
- (18) **the time.**
- (19) **A. I can't tell you.**
- (20) **Q. The first page, paragraph numbered**
- (21) **1.**
- (22) **(Brief interruption.)**
- (23) **(Discussion off the record.)**
- (24) **Q. It states here in paragraph 1,**
- (25) **"During all relevant times herein, I have been**

- (1)
- (2) rabbinical duties for the hotel that was
- (3) operated there -- in the summer 2004?
- (4) **A. Yes.**
- (5) **Q. Which parts of the Meadows Resort**
- (6) **property were used as a hotel or operated as a**
- (7) **hotel?**
- (8) **A. Basically the entire property was**
- (9) **used as a hotel.**
- (10) **Q. And families stayed there?**
- (11) **A. Families stayed there.**
- (12) **Q. Was there also a camp operated**
- (13) **there?**
- (14) **A. A small camp.**
- (15) **Q. How many children?**
- (16) **A. Twenty-something.**
- (17) **Q. All boys?**
- (18) **A. Yeah.**
- (19) **Q. In what age range?**
- (20) **A. Thirteen. Fourteen.**
- (21) **Q. And as the rabbi, did you give**
- (22) **instruction to the boys during the summer?**
- (23) **A. I studied with them all summer.**
- (24) **Q. Were you paid for your services and**
- (25) **duties as the rabbi?**

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- (1)
- (2) **A. No. My family was there. I want**
- (3) **to say the truth. My family was able to be**
- (4) **there for the summer.**
- (5) **Q. They got free room and board?**
- (6) **A. Free room and board.**
- (7) **Q. And you did, too.**
- (8) **A. Yes. I'm part of my family.**
- (9) **Q. But there was no additional**
- (10) **compensation given to you?**
- (11) **A. No.**
- (12) **Q. Let me continue with that first**
- (13) **sentence in paragraph 1 of your affidavit. It**
- (14) **says, "and worked closely with the Debtor's**
- (15) **managing member, Jack Lefkowitz, in performing**
- (16) **many functions for the Debtor, including**
- (17) **managing the Debtor, paying its account**
- (18) **payables, and helping raise funds for the**
- (19) **Debtor."**
- (20) **Is that an accurate statement?**
- (21) **A. It's accurate in the way that I**
- (22) **signed some checks and papers were given to me.**
- (23) **But that's as far as it went. Paying its**
- (24) **accounts payables. I paid. If the money was**
- (25) **needed, if Manager Turkeltaub told me something**

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- (1)
- (2) **Q. The camp.**
- (3) **A. Yes.**
- (4) **Q. And -- I'm sorry. Approximately**
- (5) **how many campers were there that summer?**
- (6) **A. Twenty-two, maybe. I don't know**
- (7) **the exact number. About 22.**
- (8) **Q. And did all those campers stay for**
- (9) **the summer of 2004 in the -- I'll call it**
- (10) **tallest of the buildings on the Meadows**
- (11) **property?**
- (12) **A. Yes. The oldest. The oldest**
- (13) **building. I think it's the Oaks building.**
- (14) **Q. The Oaks building?**
- (15) **A. I think so.**
- (16) **Q. That's not the building that you**
- (17) **resided in.**
- (18) **A. No.**
- (19) **Q. And did these campers pay anything**
- (20) **to -- when I say "the LLC," I'm referring to**
- (21) **Mateh Ephraim LLC. Did these campers or their**
- (22) **families pay anything to the LLC to attend this**
- (23) **camp?**
- (24) **A. No.**
- (25) **Q. Those who stayed in what was**

Page 30

- (1)
- (2) **has to be fixed, I get money from who I have to**
- (3) **get money from.**
- (4) **Q. What was Mr. Turkeltaub's first**
- (5) **name?**
- (6) **A. Mark.**
- (7) **Q. He was there during the summer of**
- (8) **2004?**
- (9) **A. He was there, yeah.**
- (10) **Q. Did his functions differ from the**
- (11) **functions you performed?**
- (12) **A. Yes. Mine was more rabbinical.**
- (13) **And his was -- if you excuse me, if a toilet**
- (14) **broke, he got someone to fix it.**
- (15) **Q. Who was the operator of the camp**
- (16) **during the summer of 2004?**
- (17) **A. It might have been Jack Lefkowitz.**
- (18) **It might have been myself. I don't recall.**
- (19) **What do you mean, "operator"?**
- (20) **Q. I appreciate that. Let me clarify**
- (21) **the question.**
- (22) **Do I understand correctly that the**
- (23) **LLC, Mateh Ephraim LLC, was the entity that**
- (24) **operated the camp that particular summer?**
- (25) **A. Yes. Mateh Ephraim LLC operated.**

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- (1)
- (2) **operated as the hotel during the summer of**
- (3) **2004, did they pay anything to the LLC?**
- (4) **A. I think so.**
- (5) **Q. Were there, like, nightly room**
- (6) **rates?**
- (7) **A. There was a charge to stay there.**
- (8) **What the rates were, I don't know.**
- (9) **Q. Who set those rates?**
- (10) **A. There were people -- maybe Mark**
- (11) **Turkeltaub. I'm not sure.**
- (12) **Q. When you state in this affidavit,**
- (13) **paragraph 1, that you performed many functions**
- (14) **for the Debtor, including paying its account**
- (15) **payables, what account payables were you**
- (16) **dealing with?**
- (17) **A. If a check was brought to me -- I**
- (18) **mean a bill was brought to me and I was**
- (19) **supposed to sign a check, I signed a check.**
- (20) **Q. How did it come about that you got**
- (21) **authority to sign checks on behalf of the LLC?**
- (22) **A. Should I be humble? Or should I be**
- (23) **proud?**
- (24) **Q. I want you to be truthful.**
- (25) **A. He trusted -- Jack trusted me the**

