

# Exhibit B



AMERICAN  
ARBITRATION  
ASSOCIATION\*

INTERNATIONAL CENTRE  
FOR DISPUTE RESOLUTION\*

**COMMERCIAL ARBITRATION RULES  
DEMAND FOR ARBITRATION**

For Consumer or Employment cases, please visit [www.adr.org](http://www.adr.org) for appropriate forms.

You are hereby notified that a copy of our arbitration agreement and this demand are being filed with the American Arbitration Association with a request that it commence administration of the arbitration. The AAA will provide notice of your opportunity to file an answering statement.		
Name of Respondent: 3660 BROADWAY BCR, LLC, et al. (all Plaintiffs of NYSCEF Index No. 654105/2019)		
Address: 555 WEST 151ST STREET		
City: New York	State: New York	Zip Code: 10031
Phone No.:	Fax No.:	
Email Address:		
Name of Representative (if known): SIMCHA D. SCHONFELD		
Name of Firm (if applicable): KOSS & SCHONFELD, LLP		
Representative's Address: 90 John St. #503		
City: New York	State: New York	Zip Code: 10038
Phone No.: 212-796-8916	Fax No.:	
Email Address: <a href="mailto:sds@kandsllp.com">sds@kandsllp.com</a>		
The named claimant, a party to an arbitration agreement which provides for arbitration under the Commercial Arbitration Rules of the American Arbitration Association, hereby demands arbitration.		
Brief Description of the Dispute:  Respondents (collectively, "BCR") ordered video intercom devices and related services from Claimant GateGuard, Inc. GateGuard began installation of the devices in accordance with the order. After GateGuard commenced installation on BCR's properties, BCR falsely characterized the installation as "damage" to the properties. BCR has failed to and refuses to pay GateGuard amounts due under the agreement.		
Dollar Amount of Claim: \$ 1,206,598.80		
Other Relief Sought: <input checked="" type="checkbox"/> Attorneys Fees <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Arbitration Costs <input checked="" type="checkbox"/> Punitive/Exemplary <input type="checkbox"/> Other:		
Amount enclosed: \$		
In accordance with Fee Schedule: <input checked="" type="checkbox"/> Flexible Fee Schedule <input type="checkbox"/> Standard Fee Schedule		
Please describe the qualifications you seek for arbitrator(s) to be appointed to hear this dispute:     		
Hearing locale: New York, NY (check one) <input checked="" type="checkbox"/> Requested by Claimant <input type="checkbox"/> Locale provision included in the contract		
Estimated time needed for hearings overall: 6 hours or days		



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Type of Business:		
Claimant: DE corporation		Respondent: NY LLCs
Are any parties to this arbitration, or their controlling shareholder or parent company, from different countries than each other?		
No		
Signature (may be signed by a representative): /s/ Ariel Reinitz		Date: 2/24/2020
Name of Claimant: GateGuard, Inc.		
Address (to be used in connection with this case): 1521 Alton Rd. #888 (ATTN: Ari Teman)		
City: Miami Beach	State: Florida	Zip Code: 33139
Phone No.: 212-203-3714	Fax No.:	
Email Address:		
Name of Representative: Ariel Reinitz		
Name of Firm (if applicable): FisherBroyles, LLP		
Representative's Address: 445 Park Avenue, Ninth Floor		
City: New York	State: New York	Zip Code: 10022
Phone No.: 646.494.6909	Fax No.:	
Email Address: Ariel.Reinitz@fisherbroyles.com		
To begin proceedings, please send a copy of this Demand and the Arbitration Agreement, along with the filing fee as provided for in the Rules, to: American Arbitration Association, Case Filing Services, 1101 Laurel Oak Road, Suite 100 Voorhees, NJ 08043. At the same time, send the original Demand to the Respondent.		