

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
82 SEEKONK CROSS ROAD, GREAT )  
BARRINGTON, MASSACHUSETTS, and )  
ONE COLLECTION OF GOLD COINS, )  
)  
Defendants. )

Civil Action No. 01-30108-MAP

**DOCKETED**

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America, by its attorney, James B. Farmer, United States Attorney for the District of Massachusetts, in a civil action of forfeiture alleges that:

1. This action is brought by the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881(a)(6). This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345, 1355 and 1356. Venue is appropriate pursuant to 28 U.S.C. § 1395.
2. The in rem defendants are now, and, during the pendency of this action, will be within the jurisdiction of this Court.
3. The Defendant Properties consist of (1) the real property together with any and all appurtenances and improvements located at 82 Seekonk Cross Road, Great Barrington, Massachusetts as described in more detail and recorded in the Southern Berkshire Registry of Deeds at Book 1014, Page 342 ("Lot 3"), and

01

Book 1014, Page 345 ("Lots 4 & 5"), which is held in the name of "82 Seekonk Cross Road Nominee Trust", and the Trustee of which is Linda R. Kuhnen; and (2) one collection of gold coins.

4. The Complaint Affidavit of Special Agent Robert J. Olsen of the Drug Enforcement Administration (the "Complaint Affidavit") is attached hereto as Exhibit A and incorporated herein.

5. As set forth in Special Agent Olsen's Complaint Affidavit, the Defendant Properties constitute proceeds traceable to moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished in exchange for a controlled substance in violation of Title 21 of the United States Code, and, therefore, subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

6. As set forth in the Complaint Affidavit, the Defendant Properties also constitute: (1) property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956, in which a person, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, conducted or attempted to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity with the intent to promote the carrying on of specified unlawful activity and/or knowing that the transaction is designed

in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or (2) property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1957, in which a person knowingly engaged or attempted to engage in a monetary transaction in criminally derived property that is of a value greater than \$10,000 and is derived from specified unlawful activity, that is, illegal narcotics transactions, in violation of 21 U.S.C. §§ 846 and 841(a)(1), and, therefore, is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 and/or § 1957.

7. As a result of the facts set forth herein and in the Complaint Affidavit incorporated herein, the Defendant Properties are subject to seizure and forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881(a)(6) as property involved in money laundering, or property traceable to such property.

8. By reason of these facts, the Defendant Properties are properly forfeited to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays:

(1) that a warrant and monition, in the form submitted with

this Complaint, issue to the United States Marshal for the District of Massachusetts commanding her to (a) take custody of the Defendant Property, and (b) give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;

(2) that judgment of forfeiture be decreed against the Defendant Properties;

(3) that thereafter the Defendant Properties be disposed of according to law; and


(4) for costs and all other relief to which the United States may be entitled.

Filed this 18<sup>th</sup> day of June, 2001.

Respectfully submitted,

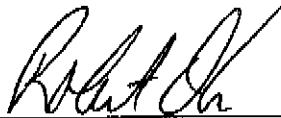
JAMES B. FARMER  
United States Attorney

By:

  
WILLIAM M. WELCH II  
Assistant U.S. Attorney


Verification

I, Robert J. Olsen, Special Agent, United States Drug Enforcement Administration, state I have read the foregoing Complaint for Forfeiture in Rem and the Affidavit attached thereto, and the contents thereof are true to the best of my knowledge, information and belief.



\_\_\_\_\_  
Robert J. Olsen  
Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me this 17<sup>th</sup> day of June, 2001.



\_\_\_\_\_  
Notary Public  
Laurie-Anne E. Potter

My commission expires:

11/08/2002

AFFIDAVIT OF ROBERT J. OLSEN

I, Robert J. Olsen, state as follows:

**I. Introduction**

1. I am employed as a Special Agent with the Drug Enforcement Administration and have been so employed since May of 1995. During the course of my law enforcement career, I have written and/or executed in excess of twenty-five search and seizure warrants for narcotics, dangerous drugs, records, and proceeds and assets obtained as a result of this illicit activity. Further, I have conducted in excess of twenty-five drug investigations which have resulted in successful prosecutions, numerous arrests, and the seizures and subsequent forfeitures of proceeds and assets obtained as a result of drug trafficking.

2. I have attended numerous DEA training courses and seminars in drug investigations and asset forfeiture. Those courses and seminars include, but are not limited to, courses in basic drug investigations, complex drug conspiracy investigations, undercover investigations, financial investigations, and asset forfeiture school.

3. I submit this Affidavit in support of a Complaint for Forfeiture in Rem against the Defendant Properties, more particularly described as:

- (a) the real property and buildings located at 82 Seekonk Cross Road, Great Barrington,

Massachusetts ("the Defendant Real Property");  
and,

- (b) a collection of gold coins ("the Defendant Gold Coins").

As set forth below, I have probable cause to believe that the Defendant Properties constitute proceeds traceable to moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished in exchange for a controlled substance in violation of Title 21 of the United States Code. I have probable cause to believe, therefore, that the Defendant Properties are subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

4. I further have probable cause to believe that the Defendant Properties constitute (1) property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956, in which a person, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, conducted or attempted to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity with the intent to promote the carrying on of specified unlawful activity and/or knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, or (2) property, real or

personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1957, in which a person knowingly engaged or attempted to engage in a monetary transaction in criminally derived property that is of a value greater than \$10,000 and is derived from specified unlawful activity, that is, illegal narcotics transactions, in violation of 21 U.S.C. §§ 846 and 841(a)(1), and, therefore, is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 and/or § 1957.

5. The Defendant Real Property is a two-story, single family residence, gray in color, with a front porch, double front doors, and an attached two-car garage. The Defendant Real Property is held by the "82 Seekonk Cross Road Nominee Trust," which was established on April 30, 1997. Two deeds to the Defendant Real Property are recorded in the Southern Berkshire Registry of Deeds at Book 1014, Page 342 ("Lot 3"), and Book 1014, Page 345 ("Lots 4 & 5"). The Trustee of the 82 Seekonk Cross Road Nominee Trust is Linda R. Kuhnen.

6. The statements contained in this affidavit are based upon my own personal investigation, information provided by a cooperating witness (hereinafter referred to as "CS"), and Internal Revenue Agent Criminal Investigation Special Agent Marion Benevento. Since this affidavit is being submitted for

the limited purpose of establishing probable cause for forfeiture of the Defendant Properties, I have not included each and every fact known to me concerning this investigation, which includes drug dealing, money laundering and passport fraud.

## II. Background of Case

7. During the week of February 12, 2001, I began an investigation into the marijuana trafficking and money laundering activities of Lawrence Boulanger (hereinafter "Boulanger"). On February 15, 2001, I met with CS. This CS was a close associate of Boulanger, and had intimate knowledge of Boulanger's drug trafficking history and financial affairs. The CS advised that Boulanger is a fugitive as a result of a 1979 cocaine trafficking offense committed by Boulanger in New York.

8. To corroborate the CS, I conducted a criminal history check into Boulanger and found a federal arrest warrant, which was dated January 15, 1980, for him. Further investigation revealed that in May, 1973, Boulanger was arrested in New York City, NY, for distribution of cocaine, in violation of 21 U.S.C. 841(a)(1). Boulanger pled guilty, but fled before sentencing. Boulanger was re-arrested in March, 1974 and subsequently sentenced to four to six years federal incarceration out of the Southern District of New York. On December 23, 1975, Boulanger was released on parole and, in 1979, violated conditions of this parole by not reporting to the parole officer. On January 15,

1980, the United States Department of Justice-Parole Commission issued a federal arrest warrant.

9. According to the CS, Boulanger presently uses the alias "John Berlingeri" and resides at the Defendant Property. The real John Berlingeri is allegedly a deceased associate of Boulanger whose identity Boulanger assumed in approximately 1990 to avoid detection by law enforcement. The CS provided information and documentation indicating that Boulanger had between \$3,000,000 and \$4,000,000 safeguarded in numerous offshore banks under false personal and corporate names. The CS stated that Boulanger has not held legitimate employment since at least 1988 and has not filed income tax returns since at least 1988. The CS further stated that the \$3,000,000 to \$4,000,000 is entirely drug proceeds derived from years of large-scale marijuana trafficking by Boulanger. Boulanger uses these offshore funds for all living expenses, which included the purchase of Defendant Properties.

10. The CS stated that Boulanger plans to move his family to Belize in the late summer, 2001, to avoid potential arrest by United States authorities. Boulanger is currently building a house on Belize and establishing bank accounts in Latin America.

### III. Historical Evidence of Drug Distribution

11. The CS advised that the CS has been a close companion of Boulanger since 1988. Prior to the CS's association with

Boulanger, the CS was a close associate of Michael Spitzer, who, as discussed below, participated with Boulanger in the distribution of marijuana. The CS stated that Boulanger lived in Chicago, Illinois, prior to 1988. From approximately 1988 through 1990, Boulanger lived in Tucson, Arizona. In approximately 1990, Boulanger moved to Richmond, Massachusetts, until approximately 1995. In approximately 1995 and 1996, Boulanger lived in Tempe, Arizona. In approximately 1997, Boulanger moved into a newly constructed residence on Defendant Real Property.

12. The CS stated that during the 1980s and continuing until at least 1995, Boulanger transported 400-500 pound shipments of marijuana from Mexico, through Arizona, and to Chicago, and then to New York City, New York, for distribution. The CS knows this from the CS's close association with Boulanger and Spitzer. During the 1980s, Spitzer assisted Boulanger in the transportation and distribution of marijuana. While the CS lived with Boulanger in Arizona from approximately 1988 through 1990, Boulanger obtained marijuana from a source of supply in Nogales, Mexico. The source of supply smuggled the marijuana across the Mexican border and delivered the marijuana to Boulanger's Tucson residence. Boulanger then used full-size rental vehicles to transport marijuana from Tucson to distribution points in Chicago and New York City.

15. The CS also identified Stephen Felkins as a criminal associate of Boulanger. To corroborate the CS, I conducted a criminal history check of Felkins and determined that Felkins had been convicted for misdemeanor possession of marijuana in 1974 in Phoenix, Arizona, and felony possession of marijuana for sale, and felony transportation of marijuana, in 1976. Felkins has been arrested for felony possession of marijuana for sale in 1982, felony possession of dangerous drugs for sale in 1982, felony marijuana smuggling in 1990, and felony possession of marijuana for sale in 1990. These arrests all occurred in the Phoenix area.

16. The CS also identified Barbara Duffy as a criminal associate of Boulanger. Duffy is the widow of John Berlingeri (the identity which Boulanger has assumed). The CS stated that law enforcement detained Duffy and seized a large amount of cash from her person sometime between 1990 and 1995. The CS told me that the cash was from Boulanger's marijuana smuggling operation. The CS stated that Barbara Duffy was last known to be living in Silver City, New Mexico.

17. To corroborate the CS, I conducted a criminal history check on Barbara Duffy and learned that on March 17, 1992, DEA agents in Albuquerque, New Mexico, while conducting an investigation at the local Amtrak terminal, discovered that a "B. Duffy" had purchased a one-way cash ticket for travel from

Poughkeepsie, New York to Flagstaff, Arizona through Chicago. Upon questioning, Duffy told agents that she did not possess any large sums of cash. Duffy, who was living in Silver City, New Mexico at the time, gave agents consent to search her luggage, whereupon the agents found a video camera case inside her luggage. Duffy told agents that the camera case was not hers, and that she did not know what was inside it. Agents searched the case and discovered a large amount of cash. Agents found more cash inside a second bag. Duffy told the agents that the money did not belong to her, and that she did not know to whom the money belonged. The total cash amount seized and ultimately forfeited from Duffy was \$494,420.

18. The CS also identified Victor A. Arbulu as another marijuana and money laundering associate of Boulanger. To corroborate the CS, I conducted a criminal history check on Arbulu and learned that in 1989, DEA agents detained Arbulu in Chicago after the agents were alerted that Arbulu was traveling to Chicago from Detroit, Michigan, with a large amount of cash. Arbulu had been questioned by authorities in Detroit, and had been vague as to the nature of the cash. Shortly after deplaning in Chicago, Arbulu was questioned by agents as to whether he was carrying any drugs or large amounts of currency. Arbulu became very nervous and told agents that he had no drugs, but did have currency. Arbulu gave agents consent to search his baggage.

Agents discovered \$35,500 cash in Arbulu's baggage. Arbulu told agents that the money was not his, but belonged to a client who Arbulu refused to name. Arbulu claimed the money was for an investment, but would not elaborate. Inside a second bag belonging to Arbulu, a duffel bag, agents detected the strong odor of marijuana. Inside the duffel bag were two empty duffel bags, both of which appeared to contain marijuana residue and emitted a strong odor of marijuana. The agents informed Arbulu that they would count the money, and that Arbulu would witness the counting. Arbulu declined to watch, and asked if he was free to leave. Agents responded yes, and Arbulu departed. The agents counted the money, which consisted of 240 fifty-dollar bills and 1,175 twenty-dollar bills. Based on my training and experience, large sums of money in smaller denominations is "street money," which is the usual payment for narcotics on the street among drug traffickers. Subsequently, a police drug-detecting canine alerted positively to both the money and the duffel bags. The United States forfeited the \$35,500.

19. Through the criminal history check, I further learned that on October 21, 1996, Victor Arbulu was traveling by train from Scottsdale, Arizona, to Chicago on a cash one-way ticket. DEA agents in Albuquerque, New Mexico, conducting a routine investigation, boarded the train and spoke with Arbulu. When asked by agents for consent to search his luggage, Arbulu stated

that a big, black bag in the common luggage area did not belong to him, but that he had been paid to carry it. A police canine unit alerted positively to the presence of narcotics inside the black bag in question. A subsequent search of the bag revealed approximately forty-eight pounds of marijuana concealed inside the bag. Arbulu was arrested for felony possession of marijuana for sale. The CS told me that she believed Boulanger was the source for Arbulu's marijuana as she did not know Arbulu to have any other sources of supply.

20. The CS also voluntarily provided me with a number of documents to self-corroborate the CS's knowledge of Boulanger's drug distribution history. One of the documents that I received from the CS is a copy of a handwritten note, allegedly written by Boulanger, that lists telephone booth numbers and a home number at which "Vic" can be contacted as of March, 1997. The home number written by Boulanger is "451-6209." When Arbulu had been arrested by agents in Albuquerque, New Mexico with forty-eight pounds of marijuana on October 21<sup>st</sup>, 1996, Arbulu provided an address of 10928 N. 130<sup>th</sup> Place, Scottsdale, AZ, and a home telephone number of (602) 451-6209. The CS explained that Boulanger had a series of public pay telephones that he used to communicate with Arbulu. On the handwritten note allegedly written by Boulanger are telephone numbers for eight telephone booths.

21. In addition, the CS provided me with a copy of what appears to be, based on my training and experience, a drug ledger. The document, allegedly written by Boulanger, is dated "1/25/85" and contains two columns. The left column consists of nineteen first names and/or individuals' initials, and the right column consists of numerical figures ranging from "50" to "89,000." I believe these figures to be currency amounts owed Boulanger by the individuals listed. Two of the listed names are "Victor" and "Spitz." The CS identified "Victor" as Victor Arbulu and "Spitz" as Michael Spitzer. The CS knew several others by first name only, and identified them as past marijuana customers of Boulanger.

22. In addition, the CS gave me copies of several photographs of Boulanger's. The CS provided one photograph that showed Boulanger accompanied by Victor Arbulu and Michael Spitzer, and the CS identified Arbulu and Spitzer. I obtained an arrest photograph of Spitzer, and the individual in the photograph identified by the CS as Spitzer appears to be the same individual identified as Spitzer in the arrest photograph. In the same photograph provided by the CS, the individual identified as Victor Arbulu is wearing a T-shirt with the name "Victor" written across the front. The CS also identified Stephen Felkins and Barbara Duffy as individuals in Boulanger's photographs. The CS also provided me with other photographs of Boulanger's. These

photographs appear to show Boulanger and associates handling and wrapping large, black plastic bags allegedly filled with marijuana. The CS had the opportunity to see how Boulanger's marijuana was packaged for transport, and stated that the bags in the photographs were consistent with Boulanger's packaged marijuana. Based upon my training and experience, I also recognized the bags in the photographs as consistent with how large amounts of marijuana are wrapped and packaged for transport and distribution.

23. As stated in Paragraph 11, Boulanger lived in Richmond, Massachusetts, in 1995. The CS stated that while Boulanger was living in Richmond in 1995, two men arrived at Boulanger's residence and threatened Boulanger at gunpoint to give them "the money." Boulanger refused to give these men any money until one of the men physically assaulted Boulanger's wife. Eventually, Boulanger instructed his wife to open a locked safe in the residence that contained a large amount of currency. The two men took the money, which the CS estimated to be approximately \$1,000,000 cash, and departed. No one was able to identify the two armed men, and the crime was never reported to police. Boulanger's failure to report this theft is consistent with my training and experience regarding theft of drug proceeds, as the "victim" is unable to provide police with a legitimate source for the money, and does not want to risk exposing his drug-

- b. \$300,000 to be sent to an account in Panama;
- c. \$65,000 to be sent to an account in the Cayman Islands;
- d. \$90,000 to be sent to an account in Antigua, and
- e. \$480,000 to be withdrawn from Serfin Bank by Boulanger's marijuana source of supply, taken to a currency exchange in Mexico, and then sent to a second account in Canada.

25. According to the handwritten flow chart and the CS's statements, Boulanger, utilizing an alias of "Brian Richards," opened an account at Bital Bank in Mexico with approximately \$2,500,000 in drug proceeds. From this account, Boulanger caused the money to be sent in varying amounts to several Peruvian accounts as follows:

- a. \$977,000 sent to a Peruvian bank account;
- b. \$375,000 under the alias "Brian Richards" to another Peruvian bank account;
- c. \$46,000 to a Cayman Islands bank account; and,
- d. \$1,050,000 to several Peruvian accounts.

According to the CS, Arbulu facilitated the opening and depositing of the \$1,050,000 in drug proceeds into several Peruvian accounts. Arbulu allegedly is from Peru and has contacts there. The flow chart continues to show the money movement into and out of banks and financial institutions until the present day. According to the CS, in 1997, Victor Arbulu diverted approximately \$700,000 of Boulanger's drug proceeds into his own account. Boulanger eventually noticed the missing money

and confronted Arbulu. Arbulu gave Boulanger back \$400,000, but claimed that the other \$300,000 was gone. Since this incident, the CS does not believe that Boulanger has been in contact with Arbulu.

26. The CS has provided me with more recent information regarding Boulanger's money laundering both through copies of documents and statements. According to the CS, Boulanger has approximately \$2,400,000 in at least nine separate bank accounts in Switzerland, approximately \$328,000 in at least three separate bank accounts in Panama, and approximately \$725,000 in at least two bank accounts in the Channel Islands. In November, 2000, Boulanger responded to an advertisement placed in "The Freebooter" by Richard Lawrence. The Freebooter is a publication out of England that teaches individuals how to conceal their identities and finances from government intervention. Richard Lawrence, a.k.a. Roger Williamson, advertises himself as an expert in managing offshore accounts to shield investments from government scrutiny.

27. Since November, 2000, Boulanger has been in almost daily contact with Williamson via encrypted electronic mail ("e-mail"). The CS provided me with copies of a number of these e-mails. In an e-mail dated November 10, 2000, Williamson responded to Boulanger's fear of detection by advising Boulanger to "have someone else be the signatory to a corporate (IBC)

account for you, which is what all my clients do." Williamson assured Boulanger that he travels frequently, and that he is "not under the financial jurisdiction of any country." In an e-mail dated November 13, 2000, Boulanger asked Williamson that,

although the funds are already offshore (but they now may be subjected to scrutiny by the IRS), I am most definitely interested in using an interface company so as not to leave a paper trail between my present and future accounts. How reliable are these intermediary accounts? Would they withstand IRS scrutiny? Have you had any experience with this before? And what are your fixed fees for these interface services?

Williamson responded that his

intermediary accounts are at highly respected banks in the Channel Islands. The IRS have no interest in me because I am not a US citizen and so I have not had any experience of scrutiny from the IRS. I normally charge 1% for the use of my pass-through accounts.

28. In an e-mail dated November 16, 2000, Boulanger asked Williamson to establish a password so that Williamson will know "it's me." They agreed on "bluefrost," Boulanger's e-mail screen name. The financial relationship between Boulanger and Williamson can be described as follows. Boulanger communicated with Williamson via encrypted e-mail, and so far has deposited approximately \$725,000 into two dummy corporate accounts Williamson has set up for Boulanger: Wheatsheaf Investments and Nuova Holdings. These proceeds also passed through Williamson's stepping account, Stockwood Investments. On March 14, 2001,

30. As further corroboration of the CS, the CS advised me that the CS had removed approximately 150 gold coins and documents from storage locker 162D at Stor-It-All in Sheffield for me to see. I personally observed the approximately 150 gold coins and documents that Boulanger had stored in the storage locker. The CS advised me that the CS returned the gold coins and documents to the storage locker because the CS was concerned that Boulanger would notice the items missing upon his return from Belize.

31. In addition, on May 29<sup>th</sup>, 2001, the CS advised me that the CS had unburied two boxes of gold coins and knew where a third box of gold coins was located. On May 29<sup>th</sup>, 2001, I and another agent seized the two boxes of gold coins from the CS. The CS advised that Boulanger originally buried a total of seven boxes of gold coins, each containing 600 gold coins, while Boulanger lived in Richmond. The CS believed that Boulanger had sold the gold coins in three of the boxes. The CS stated that the seventh box of gold coins was located in the storage locker, but no longer contained 600 gold coins. The CS stated that Boulanger had purchased the gold coins with drug proceeds. The CS knew where all of the boxes of gold coins had been buried because the CS had served as a lookout for Boulanger on previous occasions. The CS also provided me with a map, allegedly drawn by Boulanger, that showed where the gold coins had been buried.

On May 29<sup>th</sup>, the CS brought me and another agent to the location of the third box of gold coins, and I and my fellow agent unburied the box of gold coins and seized the box. The box contained 600 gold coins. On June 4<sup>th</sup>, 2001, I and another agent accompanied the CS to the wooded location where the CS had unburied two boxes of gold coins earlier. Consistent with both the handwritten map and the CS's recollection, I and another agent dug where the CS indicated and found two, larger empty boxes in which the two boxes of gold coins had been located. The three boxes of gold coins have been appraised and valued at \$477,000 worth of gold coins.

V. Building and Ownership of Defendant Real Property

32. Through documentation provided to me by the CS, Defendant Real Property is owned by a trust in Chicago. The trustee is Linda Kuhnen, who the CS identified as a long-time associate of Boulanger. The CS identified the general builder of the Defendant Real Property as Jeffrey Polidoro of Otis, Massachusetts. The CS stated that Boulanger bought the land from Polidoro, and then had Polidoro construct the residence. Polidoro was the general contractor. The CS stated that Boulanger paid Polidoro a total of approximately \$1,000,000 in cash for the land and the construction of the residence on Defendant Real Property. Boulanger made the payments in cash or with money orders and cashier's checks bought at different banks.

Boulanger and his family moved into the residence on Defendant Real Property in 1997. A review of publicly recorded documents showed that the Defendant Real Property has a current assessed value of \$616,000.

33. I obtained telephone records for the Defendant Real Property. Jeffrey Polidoro is listed as the subscriber to the residential telephone line even though he does not reside on the Defendant Real Property according to the CS. According to publicly recorded documents, on November 17, 1999, Jeffrey Polidoro resigned as trustee of the "82 Seekonk Cross Road Nominee Trust." Previously, on October 29, 1999, Linda R. Kuhnen had accepted appointment as Successor Trustee of the above-mentioned trust. The CS stated that Boulanger set up the trust as a means of avoiding detection by government authorities as to the true owner of the residence.

34. CS also stated that Polidoro built the residence on the Defendant Real Property. Boulanger built, or had built, a secret room in the basement of the residence that can be accessed by moving a large, steel cabinet away from a wall in the basement. The opening to the secret, concealed room is behind this large, steel cabinet. In addition, the CS knows that there is a second, smaller concealed room in the basement that can be accessed by removing three approximately twelve inch wide, wooden sections of a wall located inside concealed room number one. These

wallboards are held in place by magnets and can be removed without tools.

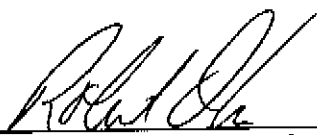
#### VI. Conclusion

35. Based on the information summarized above, I have probable cause to believe that the Defendant Real Property, located at 82 Seekonk Cross Road, Great Barrington, Massachusetts, and the Defendant Gold Coins constitute proceeds traceable to moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished in exchange for a controlled substance in violation of Title 21 of the United States Code. I have probable cause to believe, therefore, that the Defendant Properties are subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

36. I further have probable cause to believe that the Defendant Properties constitutes (1) property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956, in which a person, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, conducted or attempted to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity with the intent to promote the carrying on of specified unlawful activity and/or knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the

location, the source, the ownership, or the control of the proceeds of specified unlawful activity, or (2) property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1957, in which a person knowingly engaged or attempted to engage in a monetary transaction in criminally derived property that is of a value greater than \$10,000 and is derived from specified unlawful activity, that is, illegal narcotics transactions, in violation of 21 U.S.C. §§ 846 and 841(a)(1), and, therefore, is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 and/or § 1957.

Signed under pains and penalties of perjury this 18<sup>TH</sup> day of June, 2001.

  
\_\_\_\_\_  
Special Agent Robert Olsen  
United States Drug Enforcement  
Administration