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1 AND A SPECIAL AGENT CONDUCTS CRIMINAL INVESTIGATIONS GATHERING
2 EVIDENCE FOR PRESENTATION IN A CRIMINAL CASE.

3 Q. MR. SALINSKI, DID THERE COME A TIME WHEN YOU BECAME
4 FAMILIAR WITH THE PROPERTY AT 426 PEYTON ROAD?

5 A. YES, SIR.

6 Q. IN CONNECTION WITH THE PROPERTY, WAS A SEIZURE WARRANT
7 ISSUED?

8 A. YES, SIR, IT WAS.

9 Q. DO YOU RECALL APPROXIMATELY WHEN THE SEIZURE WARRANT WAS
10 ISSUED?

11 A. MY RECOLLECTION IS MAY 29TH, 1992.

12 Q. MR. SALINSKI, LET ME ASK YOU THIS QUESTION: IN GOING
13 THROUGH DID YOU PULL OUT GOVERNMENT'S 120?

14 A. YES, I DID.

15 Q. WHERE DID YOU PUT IT?

16 A. I BELIEVE IT TO BE IN THE STACK, THE PEYTON ROAD STACK ON
17 THE OTHER TABLE.

18 Q. LET ME HAND YOU GOVERNMENT'S 120, AND ASK YOU, SIR, WHAT
19 THAT IS?

20 A. THIS IS A CERTIFIED COPY OF THE SEIZURE WARRANT FOR 426
21 PEYTON ROAD, ATLANTA, GEORGIA.

22 Q. WHEN WAS THAT WARRANT ISSUED?

23 A. MAY 29TH, 1992.

24 Q. AND CAN YOU TELL US, MR. SALINSKI, WHETHER YOU UNDERTOOK
25 AN EFFORT TO SERVE THAT WARRANT AND TO GIVE NOTICE OF ITS

1 EXISTENCE?

2 A. YES, I DID.

3 Q. TELL US WHAT YOU DID.

4 A. AT 11:45 A.M. I PLACED A COPY OF THIS WARRANT ON THE DOOR
5 AT 426 PEYTON ROAD. I HAD OTHER WARRANTS TO SERVE THAT DAY,
6 AND I BELIEVE LATER ON THAT AFTERNOON I ALSO WENT TO THE HOUSE
7 OF VIRGINIA HIGH AT 4791 THOMPSON MILL ROAD TO GIVE HER A COPY
8 OF IT BUT SHE WAS NOT THERE. SO I CALLED HER ON HER DIGITAL
9 PAGER FROM MY MOBILE PHONE.

10 Q. DID SHE RESPOND TO YOU?

11 A. YES, SHE DID.

12 Q. WERE YOU FAMILIAR WITH THE VOICE OF VIRGINIA HIGH?

13 A. YES, I WAS.

14 Q. HAD YOU TALKED TO HER BEFORE?

15 A. YES, I HAD.

16 Q. WAS THE PERSON WHO CALLED YOU VIRGINIA HIGH?

17 A. I BELIEVED IT TO BE, YES.

18 Q. AND WHAT OCCURRED IN THAT CONVERSATION?

19 A. SHE SAID SHE WAS IN A MEETING AND SHE COULD NOT COME TO
20 HER HOUSE TO GET THE PAPERS, BUT I SHOULD LEAVE THEM STUCK IN
21 THE BACK DOOR OF HER HOUSE, WHICH I DID.

22 Q. WHAT DID YOU LEAVE STUCK IN THE BACK DOOR OF VIRGINIA
23 HIGH'S HOUSE?

24 A. A COPY OF THREE SEIZURE WARRANTS. ONE FOR 426 PEYTON
25 ROAD, ONE FOR 2161 PEACHTREE ROAD, AND I BELIEVE ONE FOR 5648

1 HUNTERS CHASE COURT.

2 Q. MR. SALINSKI, IN THE CONVERSATION THAT YOU HAD WITH
3 VIRGINIA HIGH, WHAT DID YOU TELL HER?

4 A. I JUST TOLD HER I HAD SOME PAPERS TO GIVE HER CONCERNING A
5 SEIZURE.

6 Q. DID YOU TELL HER WHAT HAD BEEN SEIZED?

7 A. YES. I TOLD HER SOME OF THE PROPERTIES HAD BEEN SEIZED.
8 I DON'T RECALL IF I TOLD HER SPECIFICALLY WHICH ONES.

9 Q. DO YOU KNOW WHETHER SHE RECEIVED THOSE DOCUMENTS?

10 A. I PUT THEM ON HER DOOR AS SHE INSTRUCTED ME TO.

11 Q. NOW, MR. SALINSKI, LET ME DIRECT YOUR ATTENTION TO
12 NOVEMBER 20TH, 1992, AND ASK YOU, SIR, IF YOU HAD OCCASION TO
13 EXECUTE A SEARCH WARRANT AT 4913 COVINGTON HIGHWAY, SUITE 216,
14 AT ANSAR ENTERTAINMENT?

15 A. YES, SIR, I DID.

16 Q. WHILE AT ANSAR ENTERTAINMENT, WERE YOU THE SEIZING AGENT?

17 A. YES.

18 Q. LET ME SHOW YOU GOVERNMENT EXHIBIT 184, AND ASK YOU, SIR,
19 WHAT THIS DOCUMENT IS? DO YOU RECOGNIZE IT?

20 A. THIS APPEARS TO BE A FILE SEIZED FROM ANSAR ENTERTAINMENT.

21 Q. DID YOU SEIZE THAT FILE?

22 A. YES, I WAS THE SEIZING AGENT.

23 MR. MOYE: YOUR HONOR, I WOULD TENDER GOVERNMENT
24 EXHIBIT NUMBER 184.

25 MR. ROSEN: NO OBJECTION.

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1 THE COURT: ANYONE ELSE OBJECT?

2 LET IT IN.

3 BY MR. MOYE:

4 Q. MR. SALINSKI, WHAT DOES GOVERNMENT EXHIBIT 184 CONSIST OF?

5 A. LETTER DATED APRIL 17TH, 1992 FROM DAVID WALLACE ON BEHALF
6 OF ANSAR ENTERTAINMENT TO TRAVELERS INSURANCE COMPANY. IT IS A
7 REQUEST FOR GROUP INSURANCE TO INCLUDE, AND IT APPEARS TO
8 INCLUDE -- ASKING TO HAVE AN EMPLOYEE ADDED TO THE LIST.

9 Q. WHO IS THE EMPLOYEE?

10 A. ALEX GRACIA.

11 Q. IS THERE AN ADDRESS GIVEN FOR ALEX GRACIA?

12 A. 2161 PEACHTREE STREET, NORTHEAST, NUMBER 905, ATLANTA,
13 GEORGIA.

14 Q. ARE YOU FAMILIAR WITH THAT ADDRESS?

15 A. YES, SIR, I AM.

16 Q. WHAT IS THAT ADDRESS?

17 A. THAT IS A CONDOMINIUM ACROSS FROM HOUSTON'S ON PEACHTREE
18 STREET THAT WE SEIZED, THE INTERNAL REVENUE SERVICE SEIZED.

19 Q. IS WHAT IS KNOWN AS BRADFORD ON PEACHTREE?

20 A. YES, SIR.

21 Q. MR. SALINSKI, ON THE SAME DAY, NOVEMBER 20TH, 1992, DID
22 YOU HAVE OCCASION TO EXECUTE A SEARCH WARRANT AT THE HOME OF
23 GEORGIA AND VIRGINIA HIGH?

24 A. WHICH DAY?

25 Q. NOVEMBER 20 -- EXCUSE ME. DID YOU EXECUTE A SEARCH

1 WARRANT AT THE HOME OF GEORGE AND VIRGINIA HIGH?

2 A. YES, I DID.

3 Q. WHAT WAS THE DATE?

4 A. I BELIEVE THAT TO BE JULY 27, 1992.

5 Q. MY MISTAKE. MR. SALINSKI, WERE YOU THE SEIZING AGENT AT
6 THAT ADDRESS?

7 A. YES.

8 Q. LET ME SHOW YOU GOVERNMENT EXHIBIT 174-A, AND ASK YOU IF
9 YOU ARE FAMILIAR WITH THAT ITEM?

10 A. YES, SIR, I AM.

11 Q. HOW IS IT YOU ARE FAMILIAR WITH THAT PARTICULAR ITEM?

12 A. THIS ITEM WAS SEIZED FROM AN OFFICE DESK IN THE BASEMENT
13 OF THE HIGH RESIDENCE.

14 Q. WHAT IS THE ITEM?

15 A. THIS IS A STAMP FOR THE CORPORATE SEAL FOR GRACIA LIMITED,
16 TO PUT THE SEAL ON PAPER.

17 MR. MOYE: I TENDER GOVERNMENT'S EXHIBIT 174-1, YOUR
18 HONOR.

19 THE COURT: ANY OBJECTION?.

20 MR. ROSEN: NO OBJECTION.

21 THE COURT: LET IT IN.

22 BY MR. MOYE:

23 Q. I HAND YOU GOVERNMENT EXHIBIT 174-B, AND ASK YOU, SIR, IF
24 YOU ARE FAMILIAR WITH THOSE ITEMS?

25 A. YES, SIR, I AM.

1 Q. HOW IS IT YOU ARE FAMILIAR WITH THOSE ITEMS?

2 A. DURING THE EXECUTION OF THE SEARCH WARRANT AT THE HIGHS'
3 RESIDENCE, THESE ITEMS WERE SEIZED FROM THEIR SAFE IN THE
4 MASTER BEDROOM.

5 Q. CAN YOU TELL US, MR. SALINSKI, WITH REGARD TO THOSE
6 PARTICULAR ITEMS, WHAT ARE THOSE?

7 A. I WILL PULL A FEW OUT. THEY ARE BANK STRAPS, THE KIND
8 USED TO WRAP CURRENCY. THEY ARE IN VARIOUS DENOMINATIONS.
9 THERE ARE PROPERLY HUNDREDS OF THEM IN HERE.

10 MR. MOYE: YOUR HONOR, I TENDER GOVERNMENT'S 174-B.

11 THE COURT: ANY OBJECTION?

12 MR. ROSEN: NO OBJECTION.

13 THE COURT: LET THEM IN.

14 BY MR. MOYE:

15 Q. MR. SALINSKI, WERE THEY FOUND IN THIS METAL CONTAINER?

16 A. YES.

17 Q. I HAND YOU GOVERNMENT'S EXHIBIT 174-D-5, AND ASK YOU, SIR,
18 WHAT THAT IS?

19 A. THIS IS AN ORIGINAL CHECK FOUND DURING THE SEARCH AT THE
20 HIGHS' RESIDENCE. IT IS PAYABLE TO ATTORNEY ROBERT BURROUGHS
21 FROM THE ACCOUNT OF HIGH REALTY ESCROW ACCOUNT, DATED AUGUST
22 23RD, 1989, FOR \$10,000. THE REFERENCE ON IT SAYS EM 4070
23 CASCADE ROAD.

24 MR. MOYE: I TENDER GOVERNMENT'S 174-D-5, YOUR HONOR.

25 THE COURT: ANY OBJECTION?

1 MR. ROSEN: NO OBJECTION.

2 THE COURT: LET IT IN.

3 BY MR. MOYE:

4 Q. I HAND YOU GOVERNMENT EXHIBIT 174-C, AND ASK YOU, SIR,
5 WHAT THAT IS?

6 A. THESE DOCUMENTS WERE FOUND IN THE SAFE IN THE MASTER
7 BEDROOM AT THE HIGHS' RESIDENCE DURING THE EXECUTION OF THE
8 SEARCH WARRANT. AND THE DOCUMENTS CONSIST OF A QUIT CLAIM DEED
9 FROM VIRGINIA C. HIGH TO HIGH'S REALTY FOR PROPERTY LOCATED AT
10 426 PEYTON ROAD. THIS IS DATED NOVEMBER 1ST, 1990. IT APPEARS
11 TO BE AN ORIGINAL DOCUMENT. ALSO INCLUDED IS A REAL ESTATE
12 NOTE DATED JUNE 21ST, 1990 FROM VIRGINIA C. HIGH TO ROBERT D.
13 RICHARDSON IN THE AMOUNT OF \$200,000, CALLING FOR PAYMENTS OF
14 \$35,000 EVERY -- ON THE 21ST DAY OF EVERY OTHER MONTH BEGINNING
15 GO ON AUGUST 21ST, 1990.

16 Q. IS THE NOTE MARKED IN ANY WAY?

17 A. YES, SIR. IT IS AN ORIGINAL NOTE AND IT STATES WRITTEN IN
18 HANDWRITING ON THE SIDE, PAID IN FULL AND SATISFIED, ROBERT D.
19 RICHARDSON, 8/20/91. ATTACHED TO THIS NOTE IS A SECURITY DEED
20 DATED JUNE 19, 1990, FROM VIRGINIA HIGH TO THE DANIELLE HOPE
21 RICHARDSON TRUST FUND.

22 MR. MOYE: I TENDER GOVERNMENT'S 174-D, YOUR HONOR.

23 THE COURT: ANY OBJECTION?

24 LET IT IN.

25 BY MR. MOYE:

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1 Q. MR. SALINSKI, ON THE BACK OF THE SECURITY DEED IS THERE AN
2 ADDITIONAL NOTATION?

3 A. YES, SIR. IN A SIMILAR MANNER TO THE NOTE, THIS SECURITY
4 DEED HAS WRITTEN ON THE BACK, ROBERT D. RICHARDSON, PAID IN
5 FULL AND SATISFIED, 8/20/91.

6 Q. MR. SALINSKI, HAVE YOU HAD AN OPPORTUNITY TO SEARCH THE
7 PUBLIC RECORDS RELATED TO THE PROPERTY AT 426 PEYTON ROAD?

8 A. YES, SIR, I HAVE.

9 Q. AND ANYWHERE IN THE PUBLIC RECORDS IS THERE A SATISFACTION
10 ON THE NOTE SUCH AS THE ONE YOU HAVE IDENTIFIED, GOVERNMENT'S
11 173, DOES THAT APPEAR OF RECORD ANYWHERE YOU CAN FIND?

12 A. THIS NOTE IS NOT IN THE PUBLIC RECORDS, AND THE SECURITY
13 DEED IS IN THE PUBLIC RECORDS, BUT AT THE TIME I DID THE SEARCH
14 IT WAS NOT RECORDED AS SATISFIED.

15 Q. WHEN DID YOU DO THE SEARCH?

16 A. SHORTLY PRIOR TO THE SEIZURE OF THE PROPERTY, AND THAT
17 WOULD HAVE BEEN EARLY 1992.

18 THE COURT: WE ARE GOING TO NEED TO QUIT UNTIL IN THE
19 MORNING. SOME OF THE JURORS NEED TO PICK UP PEOPLE.

20 MR. MOYE: YOUR HONOR, I'M AT A GOOD STOPPING POINT.

21 THE COURT: WE WILL START UP AT 8:30 IN THE MORNING.
22 I WILL DO MY DEAD LEVEL BEST TO GET HERE BY THEN, BUT I WILL
23 NOT MAKE YOU ANY PROMISES. WE WILL RECESS UNTIL 8:30.

24 (WHEREUPON, THE JURY RETIRED FROM THE COURTROOM,
25 AFTER WHICH THE FOLLOWING PROCEEDINGS WERE HAD.)