

AFFIDAVIT

1. My name is Stephen D. Broce. I am a Special Agent with the Federal Bureau of Investigation (F.B.I.) and have been so employed for 4 1/2 years.

I have been investigating allegations of mail and bankruptcy fraud involving Leonard Paradiso and Candace Weyant since May of 1983.

2. On May 3, 1983 the Boston office of the F.B.I. was advised by the Suffolk County District Attorney's Office of a possible bankruptcy fraud involving Leonard Paradiso and Candace Weyant. (A copy of the F.B.I. "open file" memo of this contact can be provided for in camera review by the Court.)

3. On May 9, 1983 I visited the Clerk of the Bankruptcy Court in Boston, Massachusetts, and obtained a copy of the Bankruptcy Petition and Statement of Affairs filed by Paradiso in connection with his personal bankruptcy, in August, 1981. (A copy of an F.B.I. Time Utilization Record Keeping "TURK" card can be provided for in camera review by the Court.)

4. On May 10, 1983 I interviewed Assistant District Attorney Timothy Burke, who had originally referred this matter to the F.B.I. During this interview, Burke advised me of a search that had been conducted by the Massachusetts State Police of Candace Weyant's home on April 25, 1983. Burke told me that a "ship-to-shore" radio, a depth finder, a stereo and a compass had been located in Weyant's home. Burke also provided me with photo copies of various insurance company records from Liberty Mutual Insurance Co., various reports prepared by Paradiso's Parole Officer and

registration documentation on certain vehicles and boats owned by Paradiso and Weyant. (A copy of an F.B.I. "TURK" card can be provided for in camera review by the Court.)

5. Burke also advised me on May 10, 1983 of the existence of information from an inmate at the Charles Street Jail that Leonard Paradiso had claimed to have sunk his boat, the "Malafemena" and submitted a theft claim to his insurer.

6. On June 17, 1983 I met with Massachusetts State Trooper Andy Palumbo at Logan Airport. Palumbo provided me with background information about Candace Weyant and Leonard Paradiso. In addition, Palumbo allowed me to examine items seized from Candace Weyant's house on April 25, 1983, including a "ship-to-shore" radio, a stereo, a compass and depthfinder.

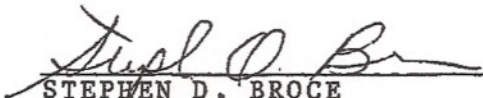
7. On July 7, 1983 I requested that Assistant U.S. Attorney Marie T. Buckley provide grand jury subpoenas for bank records of Paradiso and Weyant at the Haymarket Cooperative Bank and the Commonwealth Bank. I obtained these records on July 26 and July 27, 1983.

8. On July 11, 1983 I interviewed Elaine Covino, a paramour of Leonard Paradiso. During this interview, Candace Weyant, came to Covino's home, where my interview was taking place. I informed Weyant that she and Paradiso were under investigation for bankruptcy and mail fraud and inquired as to whether she wished to make a statement. Weyant declined to make a statement. (An F.B.I. 302 report of interview can be provided for in camera review by the Court.)

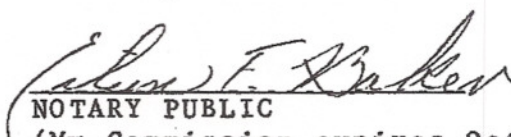
9. On August 12, 1983 I received information that had been provided on a confidential basis indicating that Paradiso's boat, the "Malafemena" had likely been sunk at its mooring

- area, Pier 7, in Boston Harbor. (An F.B.I. 302 report of interview can be provided for in camera review by the Court).
10. On approximately August 15, 1983 I provided this information to Timothy Burke. I requested that Burke arrange for a dive team to search the bottom of Boston Harbor, in the vicinity of Pier 7.
11. On August 25, 1983 I testified before a Federal Grand Jury and submitted into evidence the Bankruptcy Petition, Liberty Mutual Insurance records, vehicle registration information and Parole Department Reports which I received from Timothy Burke on May 10, 1983.
12. On September 26, 1983, Boston Police Department and Metropolitan District Commission divers located the "Malafemena" near its original mooring at Pier 7 in Boston Harbor.
13. On October 3, 1983 a confidential informant provided me with the identity of Charlene Bullerwell, a former paramour of Paradiso. (An F.B.I. 302 report of interview can be provided for in camera review by the Court.)
14. On October 4, 1983 I interviewed Bullerwell and she told me that Paradiso had spoken of sinking the "Malafemena" during the summer of 1980. (A 302 report can be provided for in camera review by the Court.)
15. I have never received any information concerning Candace Weyant's testimony before any Grand Jury from Timothy Burke, Andy Palumbo or any other source.
16. On March 9, 1984, the day after return of the federal indictment, I read a report in the Boston Herald concerning testimony given in Suffolk Superior Court by Candace Weyant.



  
STEPHEN D. BROCE  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed to in my presence,  
this 24th day of May 1984.

  
NOTARY PUBLIC  
(My Commission expires October 5, 1984)