

# EXHIBIT KK

## Supplimentary Affidavit in Support of Motion to Strike Examiner's Report #2 as a Sham and Deceit upon this Court

Peter Boisvert after being sworn depose and says that:

1. I am an employee of Cumberland Investment Corporation.
2. I have been a numismatist for over 20 years. (See exhibit #1)
3. On several occasions my duties included going to Eastland Bank.
4. At Eastland Bank, safety deposit boxes containing coins were accessed in the presence of bank representatives.
5. The safety deposit boxes were brought into different working areas, primarily a conference room near the vaults.
6. My duties included placing coins from numbered rolls, mostly containing 20 coins each, into singular plastic holders called flips.
7. The numbered rolls corresponded to a list from a Sotheby's appraisal at which I was personally present on several occasions (See exhibit #2).
8. While placing coins into the flips, I noticed that many of the coins were not as described on the Sotheby's list.
9. All flipping took place in the presence of bank representatives.
10. I took leave from the secured room to call Mr. Harold Chorney concerning the discrepancies which I considered to be major differences and not just subjective differences of grade.
11. Some of the major discrepancies are as follows:
  - a. roll 214 instead of being bright with prooflike surfaces, contained no prooflikes at all.
  - b. rolls 215, 216, 217, 218, 219, and 220 were not at all as described.
  - c. roll 236 described as backs clean, some prooflike had no prooflikes and the backs were choppy.
  - d. roll 281 was not superb as described.
  - e. roll 282 was not a superior roll as described. In fact, instead of coins dated 1922-S, there was a mixed roll of 1922-D and 1922-S.
12. Roll 286, instead of being bright and lovely, were toned and spotted.
13. Rolls 287, 288, 289, and 290 were spotty, containing a lot of inferior quality coins.
14. There is not doubt in my mind that the 300 or so coins listed in 11-13 that I personally inspected while placing coins from the rolls into flips are not the same coins that Sothebys appraised in September.

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15. On previous occasions, while Mr. Harold Chorney and Carlos Caetano were present, numerous other discrepancies were discovered. Some of the other discrepancies include:
- a. roll 138 has 1 1879-S and 19 1879-P instead of 20 1879-P.
  - b. roll 148 has 9 1922-S and 7 1922-D. Certainly Sotheby's would have noticed this since the 1922-D coins were all "yukky".
  - c. Roll 168 has 14 1882-P and 6 1880-S instead of 20 1882-P. Without a doubt Sothebys would have noticed this discrepancy.
  - d. roll 190, that Sothebys described as a "superior roll" now contained far inferior coins that are worth small percentages of the original roll.
16. There is no doubt that something has happened since the Sothebys appraisal.
17. Paper is placed on the top coin in a roll to protect the top coin when the roll top is removed.
18. I was personally with the appraisers of Sotheby's when they replaced the paper on top of the rolls containing this paper.
19. I became very suspicious when I encountered numerous rolls with the paper from the top either missing or on the bottom of the roll instead of the top.
20. On numerous occasions, Jeff Washington from Eastland Bank was apprised of the inconsistencies.
21. I am informed and believe that Jeff Washington made notes of various discrepancies.
22. On several occasions the vault contents were brought to rooms adjoining the vault area on the ground floor of Eastland Bank, a room on the second floor of Eastland Bank, as well as back to Cumberland Investment Corporation at 141 Main Street on a few occasions when all rooms at the bank were occupied.
23. On one occasion coins were stored overnight on the second floor room in a "secured" area under a table. I felt very uncomfortable with this set up, but the bank personnel would neither reopen their main vault or allow the coins to be stored overnight at Cumberland.
24. Due to my personal inspection of these coins I can only logically conclude that coins have been switched and am willing to testify to that fact.

I declare under oath that the statements in 1-24 are based upon my personal knowledge or on information and belief which I believe to be true.

\_\_\_\_\_  
Peter Boisvert

Sworn to me this \_\_\_\_ day of  
May 1990

\_\_\_\_\_  
Notary Public of this State

*count copy  
notarized*

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P.O. Box 850  
Milford, MA 01757

Member: American Numismatic Association #80087  
New England Numismatic Association #2514 Life Member  
Early American Copper Society #1965  
Florida United Numismatists, Inc.  
Greater Eastern Numismatic Association  
Garden State Numismatic Association  
American Philatelic Society #147330

Started collecting Indian Head/Lincoln cents 1965

First commercial sale 1972 at the Danbury (Conn.) Coin Show

Have attended well over 150 coin shows since the late 1960s

Have "set-up" at many major coin shows, including the Long Beach Coin Show, the Bay State Coin Show, GENA, GSNA, EAC, FUN Conventions, &c

Have had articles published in PENNY WISE--publication of EAC, and in The Colonial Newsletter. I have been doing business as the Copper Connection since 1983.

Specialist concerning early U.S. copper coinage-(Colonial and Federal), Ancient coinage, early U.S. paper currency; with a superior knowledge of Foreign and U.S. coinage, antiquities, antiques, Paper American, preservation techniques, &c

B.A. in English from The University of Massachusetts/Boston-1983

Graduate courses in Technical Writing from Bentley College-1984/5

Early American Copper Society Regional Chairman for the New England Region, and chairman for the EAC Convention to be held in Boston in April 1991