Roy Den Hollander Attorney at Law

545 East 14 Street, Suite 10D, New York, NY 10009 Telephone & Fax: 212 995 5201 Mobile 917 687 0652 Email rdhh@erols.com

August 3, 2001

US Customs Service Office of Investigations, New York Region 6 World Trade Center New York, NY 10048

Re: Shipilina, Alina A., INS A Number 047-202-363, SS Number 063 90 4695

Dear Sir or Madam:

I am writing to inform you of the repeated violation of currency transport regulations by Alina (aka Angelina) Alexandrovna Shipilina or Chipilina, a Russian national who works as a stripper and prostitute here in New York City. Every two or three months, Ms. Shipilina transports well over \$15,000 in cash out of the country without notifying Customs. Ms. Shipilina carries the money hidden in her suitcase, the heels of her shoes, or internally. She transports the cash to either Russia or Cyprus where she has a bank account in Limassol. Ms. Shipilina is in the United States as a Conditional Permanent Resident. She first entered the United States on July 10, 2000. See Exhibit 1, copy of Permanent Resident Card, photographs and description.

A number of the below cites are to Exhibit 3 that contains a copy of Ms. Shipilina's diary, which was written in Russian, and an English translation.

Her main source of income and cash comes from working as a lap dancer at the topless club Flash Dancers, located at 1674 Broadway (212 315 5107) in New York City. See Exhibit 2, copies of some of her work schedules for 2000. She works at the club under the assumed name of "Angelina". The club charges her about \$140 a night to dance and her average net is between \$500 and \$600 a night. See Exhibit 3, pages 46, 47, 48 of the English translation, pages 127, 128, 129, 130 of her Russian diary. Her gross, therefore, averages \$640 to \$740 a night—all cash. She dances five nights a week, which gives her a monthly gross of around \$13,000 to \$15,000 in cash from just stripping. Her diary states that for a month and a half from the end of July to the beginning of September 2000 she netted between \$17,000 and \$18,000. See Exhibit 3, page 48 of the English translation, page 130 of her Russian diary. A sampling of her earnings just from stripping for the year 2000 is contained in Exhibit 4. Ms. Shipilina also engages in prostitution, but I do not have any figures on those earnings.

Ms. Shipilina's trips overseas in which she illegally transported cash to Russia or Cyprus follow:

- September 9, 2000, departed JFK for Moscow on Aeroflot, the Russian International Airline. September 10, 2001, flew from Moscow to her home in Krasnodar. September 18 or 19 flew to Cyprus from Krasnodar. September 25 returned to Krasnodar from Cyprus. October 2, 2000, returned to New York on Aeroflot from Moscow.
- December 21, 2000, Ms. Shipilina departs on Aeroflot from JFK to Moscow. Returned to New York from Moscow around January 18, 2001.
- Over the last half of April and the first half of May, Ms. Shipilina traveled back to Krasnodar, Russia and Limassol, Cyprus.

Given her past record of transporting cash out of the country, Ms. Shipilina is due for another trip soon.

Before taking her cash back to Russia, Ms. Shipilina stores it in her safe deposit box (number 14299) at the Citibank at 411 Fifth Avenue, New York City. See Exhibit 3, page 47 of the English translation, page 129 of her Russian diary. The safe deposit box is under the name: Alina A. Chipilina. See Exhibit 5, copy of her safe deposit box agreement. She also has two bank accounts under the name Alina A. Chiplina at Citibank at 262 First Avenue, New York City (checking 67147197 and money market 67147234). See Exhibit 6, copy of her August 2000 bank statement. She also has a bank account in Limassol, Cyprus, under the name Alina A. Chipilina, but I am unaware of which bank it is with.

Ms. Shipilina is now living under the name of Alina A. Chipilina at the following address:

28-15 34 Street, Apt. 4H Astoria, New York 11103.

Her telephone number (718 274 4902) and mobile number (917 374 4713) are under the name Alina A. Shipilina.

Ms. Shipilina currently owns an apartment in Krasnodar, Russia at

138 Rashpilevskaya, Apt 8 Krasnodar, 350020 Telephone 55 67 71 Mobile 63 66 95

Ms. Shiplina has two international passports issued by the Russian Government. A copy of three of the pages of the one that lists her last name as Chipilina is attached as Exhibit 7. She had a second international passport issued to her in April 2000. See Exhibit 3, page 40 of the English translation of Ms. Shipilina's diary; page 104 of the Russian version. I have also attached a copy of her internal Russian passport as Exhibit 8.

I am presently suing Ms. Shipilina for an annulment of our marriage. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

Roy Den Hollander, Esq. (Ms. Shipilina's husband)