

**ARREST WARRANT AFFIDAVIT
CONTINUATION PAGE**

JD-CR-64a Rev. 10-04
C.G.S. § 54-2a
Pr. Bk. Sec 36-1, 36-2, 36-3

INSTRUCTIONS:

*The jurat is to be completed for each page of the affidavit.
The prosecutorial official and judge/judge trial referee are to date
and sign or initial each page to indicate that they have reviewed it.*

**STATE OF CONNECTICUT
SUPERIOR COURT**

**CSP-DMV Fraud Task Force
0800265932**

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|--|---------------|----------------------------|----------|
| NAME AND RESIDENCE (Town) OF ACCUSED | DOB: 11-11-46 | COURT TO BE HELD AT (Town) | G.A. NO. |
| Paul "Barney" Hallingby of 31 Kings Hill Road Sharon, CT | | Bantam | 18 |

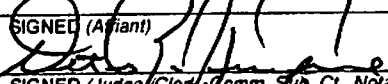
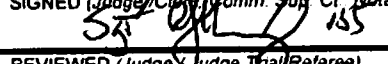
AFFIDAVIT

The undersigned affiant, being duly sworn, deposes and says:

that he, Gerald. L. Roush {another Ferrari expert}, Nick Soprano, and Mr. Hallingby, along with several hundred other Ferrari collectors, enthusiasts, dealers, journalists, attended the "RM Auction" of Ferrari Cars at the Ferrari headquarters in Maranello, Italy. After the auction, many visitors went to dinner in various restaurants in and around the village of Maranello. Mr. Massini stated that he and Gerald Roush, along with their wives, had dinner at the "Lo Smeraldo" restaurant in Maranello. According to Mr. Massini, Soprano, Paul Hallingby, and others were also having dinner in the same restaurant. Mr. Massini stated that the Soprano/Hallingby group finished dinner earlier than he and Mr. Roush. Mr. Massini stated that Hallingby walked through the room without looking at him and Mr. Roush. He stated that a little bit behind Hallingby walked Soprano. Mr. Massini stated that he greeted Soprano and that Soprano came to their table where they started a discussion about the "Stolen" advertisement that Gerald Roush had placed in his publication, "Ferrari Market Letter." According to Mr. Massini, Soprano accused Roush of "libel" and for making massive errors by publishing such ads from unknown Swiss attorneys (Oliver Weber). Mr. Massini stated that it was very intense for approximately 30 minutes. Mr. Massini stated that Gerald Roush defended himself by saying that he had good reason to believe that there really was a problem with the Ferrari bearing VIN 0799GT and that therefore he saw no reason not to publish the "Stolen" ad in his publication. Mr. Massini stated that Soprano was against all this, that it was not a nice discussion and that he feels that, naturally, Soprano was trying to defend his customer Hallingby.

23. The Affiant asked Mr. Massini if he thought it was a calculated risk taken by Hallingby when he purchased 0799GT, knowing it was stolen but thinking that because the theft was so long ago in Europe, no one would question him on the car. Mr. Massini agreed with that assumption and he added that he is also convinced that the seller(s) knew about the provenance of the car. Mr. Massini then added that the behavior of Hallingby regarding this Ferrari is rather unusual. Mr. Massini then related another incident involving Hallingby. He stated that Mr. Hallingby owns another Ferrari that also has a rather questionable history. It is a racing Ferrari built in 1964 with chassis #6045, a type 250 Le Mans Berlinetta. According to Mr. Massini, two cars exist today with that same chassis #6045. Mr. Massini stated that

(This is page 9 of a 31 page Affidavit.)

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| DATE AND SIGNATURE | DATE | SIGNED (Affiant) | Detective Richard Van Tine #732 CSP |
| | August 19 th , 2009 |  | |
| JURAT | SUBSCRIBED AND SWORN TO BEFORE ME ON (Date) | SIGNED (Judge/Clerk/Comm. Sup. Ct. Notary Pub) | Sergeant Robert J. Kenney #155 CSP |
| | August 19 th , 2009 |  | |
| REVIEWED (Prosecutorial Official) | DATE | REVIEWED (Judge/Judge Trial Referee) | DATE |
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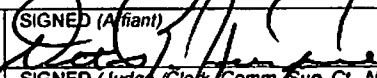

the original was destroyed many years previously in a fire. One of the two with the same chassis number, called a "reconstruction or rather a fake" by Mr. Massini, is owned by Hallingby. Mr. Massini stated that the other is in Europe. Mr. Massini stated that for quite some time, Hallingby has been trying through Soprano to have his 250 LM chassis #6045 authenticated by the Ferrari factory in Italy. According to Mr. Massini, thus far, Ferrari has refused. Mr. Massini stated that the other one in Europe with the same number can also be considered a reconstruction. Mr. Massini added that a real 250 LM (genuine and authentic) is valued today at approximately \$5 Million US Dollars.

24. Mr. Massini also confirmed that it was he who "strongly recommended" Symbolic Motor Car Company and Elliot Grossman not to buy the 1958 Ferrari bearing VIN 0799GT back in 2000 because of the legal problems.

25. On October 7th, 2008, the Affiant spoke over the phone with Mr. Klaus Schnitzer, a part time photographer and writer for "Forza" magazine. "Forza" is a magazine that caters to exotic, high performance collector cars, especially Ferrari. Previous investigation by the Affiant revealed that three of Mr. Hallingby's Ferrari automobiles were featured in the December 2007 issue of "Forza" magazine. One of them was the 1958 Ferrari bearing VIN 0799GT.

26. During the conversation with Mr. Schnitzer, he stated that he has been to Mr. Hallingby's residence on several occasions to talk about his automobile collection. According to Mr. Schnitzer, Mr. Hallingby permitted him to operate the Ferrari's highlighted in the article. Mr. Schnitzer stated that he also corresponds with Mr. Hallingby via e-mail on occasion. Mr. Schnitzer stated that he did not discuss the history of any of the cars with Mr. Hallingby and was there only to discuss their performance and to photograph them. Mr. Schnitzer stated that he was not aware of the reported theft of the 1958 Ferrari bearing VIN 0799GT that was highlighted in the article. Mr. Schnitzer stated that he does not believe that Mr. Hallingby knew the 1958 Ferrari bearing VIN 0799GT was stolen because he made no mention of it during the interview. Mr. Schnitzer stated that in his opinion, Mr. Hallingby would not show off a car he knew was stolen. The Affiant observed in the "Forza" magazine article that the 1958 Ferrari bearing VIN

(This is page 10 of a 31 page Affidavit.)

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48. Attorney Weber also stated that Mr. Friedli died in 1997 and that his heirs transferred Mr. Friedli's share of the Ferrari bearing VIN 0799GT to Dr. Gerber. {Copies of the contracts between Dr. Gerber and Mr. Friedli and Dr. Gerber and Mrs. Friedli were later obtained. The contracts show that Dr. Gerber and Mr. Friedli were partnered in the ownership of the Ferrari bearing VIN 0799GT and that after Mr. Friedli died, Mrs. Friedli signed over her interest in the car to Dr. Gerber}

49. Attorney Weber also stated that Mr. Rosen offered \$20,000.00 to Dr. Gerber as compensation for the Ferrari bearing VIN 0799GT in the year 2000. Attorney Weber stated that the offer was made through Ferrari expert Marcel Massini, though Attorney Weber stated that he does not believe Mr. Rosen and Mr. Massini know each other personally.

50. On October 8th, 2008, the Affiant received an e-mail from Ferrari expert Marcel Massini detailing information about Mr. Hallingby's 1964 Ferrari 250LM with VIN6045 that was originally destroyed in a fire after a car crash in 1969 in Hollywood, CA. {Refer to paragraph #22} Mr. Massini stated that the fire was started accidentally with a cigarette. Mr. Massini stated in his e-mail that "bits and pieces" of this Ferrari were later sold to various people. He stated that in 1982, the engine only was owned by a "Richard Freshman" of Chatsworth, CA. Mr. Massini stated that a complete car later appeared and after several owners, it was sold by Nicholas Soprano to Mr. Hallingby. Mr. Hallingby later showed this Ferrari at the 2006 Greenwich Concours. Mr. Massini stated that a second 1964 Ferrari 250LM with VIN6045 was recreated in Switzerland and Italy and later sold to someone in Japan. Mr. Massini stated that in his professional opinion, neither of these two cars has enough of the original pieces to be considered a true restoration. Mr. Massini stated that he considers both to be replicas or "fakes." Mr. Massini stated that Mr. Hallingby's Ferrari may have the original engine but not the old chassis. Mr. Massini stated that he learned from Mr. Soprano that Mr. Hallingby is "desperately" trying to have his 1964 Ferrari 250LM with VIN6045 authenticated by the Ferrari Factory in Italy. This presumably would increase its value. {Mr. Massini is the author of the 1983 book "Ferrari 250 LM."}

51. On January 15th, 2009, Mr. Massini again e-mailed the Affiant to advise that the "Sports Car Market" magazine featured an article about Ferrari 250 LM

(This is page 19 of a 31 page Affidavit.)

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