

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 – against –)
)
 THE REAL PROPERTY AND PREMISES)
 LOCATED AT 8 HALE DRIVE,)
 HALFMOON, NEW YORK, 12065, AND)
)
 THE REAL PROPERTY AND PREMISES)
 LOCATED AT 127 GRENADIER COURT)
 HALFMOON, NEW YORK, 12065,)
)
 Defendants *in rem.*)

VERIFIED CLAIM

Civil Action No. CV18-3041

Pursuant to Rule G(5)(a)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Nancy Salzman and Executive Housing & Properties, Inc. (the “Claimants”), by and through counsel, hereby claim an ownership interest in all or part of the defendant property described below, which is the subject of the above-referenced case. In support of this claim, Claimants state the following:

1. Claimants hold legal title and/or beneficial ownership of the real property and premises located at 8 Hale Drive, Halfmoon New York 12065, together with its respective buildings, appurtenances, improvements, fixtures, attachments, easements, and furnishings, including any proceeds traceable thereto (the “Hale Drive Property”).
2. Specifically, as alleged by the United States, title of the Hale Drive Property is held by Executive Housing & Properties, Inc., a domestic business corporation registered in the state of New York in 2004. *See Verified Complaint In Rem*, ¶¶ 2, 14. Nancy Salzman is

listed as the chief executive officer of that entity, which was dissolved by proclamation in 2009. *See id.* at ¶ 2.

3. This ownership information is consistent with a search of state of New York corporate records and Saratoga County land and tax records. *See, e.g.*, Ex. A (Property Description Report For: 8 Hale Dr., Municipality of Halfmoon).
4. I, Claimant, Nancy Salzman, after having been duly sworn under oath, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and I hereby declare under penalty of perjury that my claim and that of Executive Housing & Properties, Inc., to this property are not frivolous and are made in good faith.

Dated: June 28, 2018

Boston, Massachusetts

Respectfully submitted,

/s/ Michael J. Sullivan
Michael J. Sullivan, *pro hac vice*
ASHCROFT LAW FIRM, LLC
200 State Street, 7th Floor
Boston, MA 02109
617-573-9400
msullivan@ashcroftlawfirm.com

**UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,

Plaintiff,

– against –

THE REAL PROPERTY AND PREMISES)
LOCATED AT 8 HALE DRIVE,)
HALFMOON, NEW YORK, 12065, AND)

THE REAL PROPERTY AND PREMISES)
LOCATED AT 127 GRENADIER COURT)
HALFMOON, NEW YORK, 12065,)

Defendants *in rem*.

Civil Action No. CV18-3041

VERIFICATION

I am Nancy Salzman, referred to in the Verified Complaint *in rem*. I have an interest in the defendant property, have read the foregoing Verified Claim, and have knowledge of the contents thereof. I declare under the penalties of perjury that the contents of the same are true and correct to the best of my knowledge, information, and belief based upon the information known to me this 28 day of June, 2018.



Subscribed and sworn to before me on June 28, 2018

State of New York)

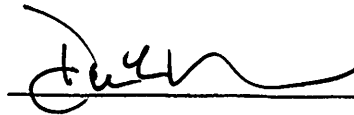
)ss:

County of Saratoga)

On the 28th day of Jun in the year 2018 before me, the undersigned, personally appeared

Nancy Salzman, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity (ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

(SEAL)



DAWN L. MORRISON
Notary Public, State of New York
Qualified in Saratoga County
No. 01MO6084819
My Commission Expires Dec. 16, 20 18

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2018, a true and correct copy of the foregoing was furnished by U.S. Mail and email (karen.orenstein@usdoj.gov) to the below-referenced attorney(s) and by filing the same via ECF with this Court.

Richard P. Donoghue, United States Attorney
Karin Orenstein, Assistant U.S. Attorney
U.S. Attorney's Office for the
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

/s/ Michael J. Sullivan
Michael J. Sullivan

EXHIBIT A



Property Description Report For: 8 Hale Dr, Municipality of Halfmoon



Status:	Active
Roll Section:	Taxable
Swis:	413800
Tax Map ID #:	279.53-2-20
Property Class:	210 - 1 Family Res
Site:	RES 1
In Ag. District:	No
Site Property Class:	210 - 1 Family Res
Zoning Code:	07
Neighborhood Code:	38620
School District:	Shenendehowa
Total Assessment:	2018 - Tentative \$71,800 2017 - \$71,800
Property Desc:	Tnhse/lot 8
Deed Page:	297
Grid North:	1461074

Total Acreage/Size:	0.01
Land Assessment:	2018 - Tentative \$9,900 2017 - \$9,900
Full Market Value:	2018 - Tentative \$125,415 2017 - \$123,793
Equalization Rate:	----
Deed Book:	1671
Grid East:	698554

Area

Living Area:	1,214 sq. ft.	First Story Area:	595 sq. ft.
Second Story Area:	619 sq. ft.	Half Story Area:	0 sq. ft.
Additional Story Area:	0 sq. ft.	3/4 Story Area:	0 sq. ft.
Finished Basement:	0 sq. ft.	Number of Stories:	2
Finished Rec Room:	0 sq. ft.	Finished Area Over Garage:	0 sq. ft.

Structure

Building Style:	Townhouse	Bathrooms (Full - Half):	1 - 1
Bedrooms:	2	Kitchens:	1
Fireplaces:	1	Basement Type:	Slab/pier
Porch Type:	Porch-covered	Porch Area:	24.00
Basement Garage Cap:	0	Attached Garage Cap:	0.00 sq. ft.
Overall Condition:	Normal	Overall Grade:	Average
Year Built:	1986		

Owners

Executive Housing & Prop Inc
3 Tallow Wood Dr Unit G
Clifton Park NY 12065

Sales

Sale Date	Price	Property Class	Sale Type	Prior Owner	Value Usable	Arms Length	Addl. Parcels	Deed Book and Page
1/23/2004	\$118,900	210 - 1 Family Res	Land & Building	Fortin, Laury	No	No	No	1671/297
5/25/2001	\$89,000	210 - 1 Family Res	Land & Building	Marchese, Joseph A Jr	Yes	Yes	No	1581/538
10/28/1996	\$64,800	210 - 1 Family Res	Land & Building	Julien, Karen	Yes	Yes	No	1448/92
5/1/1988	\$84,500	210 - 1 Family Res	Building Only	Julien, Karen	Yes	Yes	No	1233/138

Utilities

Sewer Type:	Comm/public	Water Supply:	Comm/public
Utilities:	Gas & elec	Heat Type:	Electric
Fuel Type:	Electric	Central Air:	Yes

Improvements

Structure	Size	Grade	Condition	Year
Porch-coverd	24.00 sq ft	Average	Normal	1986

Special Districts for 2018 (Tentative)

Description	Units	Percent	Type	Value
AD009-Hlfmn ambulance dist	0	0%		0
FD005-Hm-wfd. fire dist #1	0	0%		0
LB002-Library	0	0%		0
PC020-Partial collector	1	0%		0
SE020-Sewer	1	0%		0
WT028-Conso wt dist zone 1	1	0%		0

Special Districts for 2017

Description	Units	Percent	Type	Value
AD009-Hlfmn ambulance dist	0	0%		0
FD005-Hm-wfd. fire dist #1	0	0%		0
LB002-Library	0	0%		0
PC020-Partial collector	1	0%		0
SE020-Sewer	1	0%		0
WT028-Conso wt dist zone 1	1	0%		0

Exemptions

Year	Description	Amount	Exempt %	Start Yr	End Yr	V Flag	H Code	Own %
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Taxes

Year	Description	Amount
2018	County	\$1,091.71
2017	County	\$1,068.70

*** Taxes reflect exemptions, but may not include recent changes in assessment.**