

- 15) The folded piece of paper that contained two oxycodone pills that Sgt. Leblanc retrieved from the ground where Diaz had been standing was a receipt from "Speed Rewards" that had [REDACTED] name printed on it.
- 16) [REDACTED] told Off. Michel that the two small pills that Sgt. Leblanc retrieved from the ground where [REDACTED] had been standing were, in fact, **oxycodone**, and that he was addicted to that substance.
- 17) The Town of Westminster, Massachusetts police also seized a plastic baggie that contained approximately one ounce of marijuana and a small bottle of an unopened fireball whiskey.
- 18) The Town of Westminster, Massachusetts police also seized the **Defendant, Two Thousand Three Hundred Dollars (\$2,300.00) In United States Currency**, from Diaz that included 73 \$20.00 bills.
- 19) Cash is probative of illegal activity. See United States v. \$31,990 in United States Currency, 982 F.2d 851, 854 (2d Cir. 1993) (presence of a large amount of cash supports an inference of illegal activity). See e.g., United States v. \$2,500 in United States Currency, 689 F.2d 10, 16 (2d Cir. 1982) (noting that cash amount of \$2,500 "is substantially greater than is commonly kept [in someone's pocket] or in residential premises by law-abiding wage earners").
- 20) "Cash is the most common form of payment for narcotics because it is difficult to trace." United States v. Hubbard, 61 F. 3d 1261, 1274 (7<sup>th</sup> Cir. 1995).
- 21) Large quantities of used \$20.00 bills - especially when grouped into elastic-banded stacks - are consistent with the proceeds of street-level drug sales. See e.g., Commonwealth v. \$6,245.00, 880 A. 2d 523, 531 (Pa. 2005).
- 22) A large quantity of cash that consists primarily of \$20.00 bills is consistent with the proceeds of street-level drug sales. See, e.g., United States v. Eighty Thousand Six Hundred Thirty-Three Dollars (\$80,633.00), 512 F. Supp. 2d 1196, 1205 (M.D. Ala. 2007) (much of the seized cash was in denominations of "twenties and fifties," a fact which is an indicator of drug-related cash); Commonwealth v. Ruell, 459 Mass. 126, 129 (2011) (defendant "had been purchasing \$20 or \$40 bags of lesser quality marijuana"); Commonwealth v. Charros, 443 Mass.