

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America,
Plaintiff

v.

Thomas A. Shay,
Alfred W. Trenkler,
Defendants

Criminal No.: 92-10369-Z

DEFENDANT ALFRED TRENKLER'S RULE 7(f) MOTION
FOR BILL OF PARTICULARS

Now comes defendant and requests the government be ordered to more particularly state the following material:

Count One (conspiracy):

1. The date or dates in September and October, 1991, defendant "combined, conspired and agreed with" Thomas Shay to commit the offenses.

2. The precise place where the alleged conspiratorial agreement was made.

3. The nature of the alleged conspiratorial agreement.

Manner & Means of Conspiracy:

1. The place, date and discussion referred to in paragraph 1 of this section of Count One of the Indictment.

2. The acts defendant allegedly committed to "assist Shea in acquiring explosives and other materials" as alleged in paragraph 2. The acts defendant allegedly committed to acquire "explosives and other materials" as alleged in paragraph 2. For each act, please specify date and location.

3. The place, date and time defendant is alleged to have affixed or assisted in affixing the device as alleged in paragraph 3.

Overt Acts:

- a. The date, or dates, place or places Shay is alleged to have solicited the assistance of Trenkler as alleged in paragraph a.
- b. The date or dates Trenkler is alleged to have agreed to build the device. The place where Trenkler is alleged to have built the device. The source of the dynamite Trenkler is alleged to have used to build the device.
- d. The date or dates Trenkler is alleged to have built the device. The place where Trenkler is alleged to have built the device. The source of the dynamite Trenkler is alleged to have used to build the device.
- e. The place on the automobile where defendants are alleged to have affixed the device.

Please list any other overt acts the government plans to rely on to prove its conspiracy case.

Count Two:

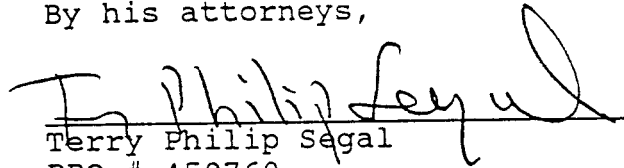
1. Please state the date, and place where defendants are alleged to have received the dynamite.
2. Please state the source of said dynamite.

3. Please state whether Trenkler is alleged to have aided and abetted and, if so, the manner and means by which he allegedly aided and abetted the receipt in interstate commerce of dynamite and detonators.

Count Four:

1. Please state whether Trenkler is alleged to have aided and abetted and, if so, the manner and means by which he is alleged to have aided and abetted in connection with count four's allegations.

Respectfully submitted,
For the Defendant,
ALFRED W. TRENKLER
By his attorneys,



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Dated: January 19, 1993