

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ALFRED W. TRENKLER

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CRIMINAL NO. 92-10369-Z

**GOVERNMENT'S MOTION TO COMPEL  
DISCLOSURE OF EVIDENCE BY THE DEFENDANT**

The United States of America hereby moves, pursuant to Fed. R. Crim. P. 16(b)(1)(A) and (B) and Local Rule 116.1(B) that defense counsel for Alfred Trenkler be required to produce to the government:

1. All "books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in chief at trial" (Rule 16(b)(1)(A)); and
2. All "results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to that witness' testimony." (Rule 16(a)(1)(B)).

In support hereof, the government states it requested reciprocal discovery in its automatic discovery letter to Trenkler's counsel (dated December 23, 1992), the rules of the Court provide for such discovery, and a similar order has already been entered obligating such discovery from Trenkler's co-defendant, Thomas A. Shay.

WHEREFORE, the government requests that this motion be allowed.

Respectfully submitted,

A. JOHN PAPPALARDO  
United States Attorney

By:

  
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PAUL V. KELLY  
Assistant U.S. Attorney

  
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FRANK A. LIBBY, JR. PK  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
May ~~26~~<sub>27</sub>, 1993

I, PAUL V. KELLY, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by first-class mail, to Terry P. Segal, Esquire, Segal & Feinberg, 200 Commercial Street, Boston, Massachusetts 02110.

  
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PAUL V. KELLY  
Assistant U.S. Attorney