

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America)

v.)

Thomas A. Shay)
Alfred W. Trenkler)

Criminal No. 92-10369-Z

**Defendant Alfred Trenkler's Motion For Further Specific
Exculpatory Evidence And/Or Evidence "Material To The
Preparation Of The Defense" Pursuant To Rules 16(a)(1)(C) and
16(a)(1)(D)**

Now comes defendant, by his attorney, and pursuant to Brady v. Maryland, 373 U.S. 83 (1963); U.S. v. Bagley, 473 U.S. 667 (1985); Giglio v. United States, 405 U.S. 150 (1972), and U.S. v. Augurs, 427 U.S. 97 (1976); makes the following specific requests for disclosure of exculpatory evidence. Defendant notes that in many cases said requests not only seek exculpatory evidence but also items "material to the preparation of the defense" pursuant to Rule 16(a)(1)(C) and (D):

1. The ATF Explosive Technical Branch reports of reconstruction of the device. Said reports should include, inter alia, information on how the electronic components recovered by ATF function.

2. Any ATF mock-ups of the device and any information reflecting how they function.

3. Any material submitted to the BPD of ATF by the Christian Science Church in connection with the investigation and this case. Said material would, inter alia, include the security log at the Church for September and October, 1991, reflecting people who signed in and worked on the roof of the Church in connection with a satellite installation.

4. Any ARCOM records submitted by Rich Brown to law enforcement in connection with this case, and not previously turned over to defendant. Said records would include, inter alia, ARCOM time cards for September and October, 1991.

5. Any ARCOM October, 1991, phone bills presently in the possession of the BPD, ATF or the U.S. Attorney.

6. Any material in the possession of the BPD, ATF or the U.S. Attorney which has not already been turned over and reflects defendant's whereabouts on October 18, and 27, 1991.

7. Any material in the possession of BPD, ATF or the U.S. Attorney which has not been turned over and reflects law enforcement's unsuccessful efforts to prove defendant purchased, received, or obtained the explosives used to build the device.

8. Any material presently in the possession of BPD, ATF or U.S. Attorney reflecting Radio Shack or other electronics store purchases by defendant from 1988-1991.

9. Any information BPD or ATF has about requests or discussions with any potential government witness about the reward in this case. Defendant specifically requests

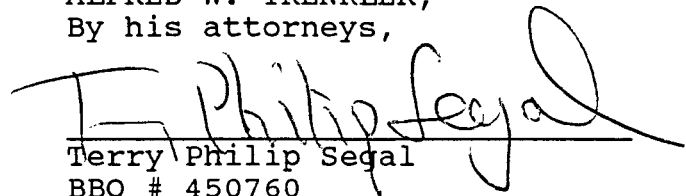
information about such discussions with Donna Shea, John Shea, James Harding and Ed Carrion.

10. Any transcripts, summaries, etc., of the Harding-Trenkler tapes referred to in Paul Kelly's December 30, 1992, letter to Terry Segal.

11. All documents reflecting interviews, contacts, conversations between members of the BPD, ATF and/or the U.S. Attorney's office and James Harding from October 28, 1991 to date.

12. All documents reflecting interviews, contacts, conversations between members of the BPD, ATF and/or the U.S. Attorney's office and Donna Shea from October 28, 1991 to date.

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



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Dated:

January 19, 1993