

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Criminal No.
)	92-10369-Z
THOMAS A. SHAY and)	
ALFRED W. TRENKLER,)	
Defendants.)	
_____)	

DEFENDANT'S MOTION TO SUPPRESS
STATEMENTS OF JANUARY 31, 1992

Now comes the Defendant, Alfred Trenkler, and moves this Court to suppress any and all statements made by him to law enforcement officers on January 31, 1992.

As grounds therefore, the Defendant says the statements were:

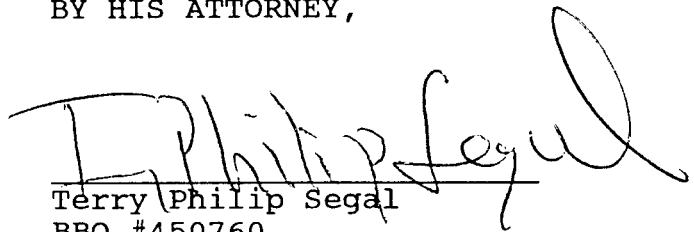
- a) taken in violation of his right to counsel;
- b) given in response to custodial interrogation;
- c) given without the benefit of Miranda warnings;
- d) involuntary; and
- e) the fruit of an illegal search executed pursuant to a defective warrant;

all in violation of the Fourth, Fifth, and Sixth Amendments to the United States Constitution. (See also, Affidavits of Alfred W. Trenkler, John Cates, and Martin Cosgrove in Support of Motions to Suppress.)

WHEREFORE, Defendant prays his motion be allowed.

Alfred W. Trenkler,
BY HIS ATTORNEY,

2-12-93
Date



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on 2-12-93.

Terry Philip Segal (sg)