

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

THOMAS A. SHAY and
ALFRED W. TRENKLER

Criminal No.:
92-10369-Z

AFFIDAVIT OF JAMES KAROLIDES IN SUPPORT OF
DEFENDANT, ALFRED W. TRENKLER'S MOTION FOR
ISSUANCE OF SUBPOENAS PURSUANT TO F.R.C.R.P. 17(c)

Now comes James Karolides, and on my oath do hereby state the following:

1. On or about April, 1992, I was retained by Terry Philip Segal, Esq., counsel for defendant, Alfred W. Trenkler, to conduct an investigation into the events surrounding the incident alleged in the above-referenced case.

2. I have been a private investigator for the past four (4) years.

3. Prior to becoming a private investigator, I was employed by the Bureau of Alcohol, Tobacco and Firearms for twenty (20) years.

4. On or about May 27, 1992, I travelled to the Christian Science Church's Security Offices and met with one Richard Constantino, Operations Manager and Security Chief for the Christian Science Church. At this time, I requested the records of the sign in and sign out log for the period from October 20, 1992 through October 28, 1991. At this time, I was informed that he did

not know where they were or whether I could have copies. I was subsequently contacted by Mr. Constantino, who informed me that said records were no longer available because they had been either lost or destroyed.

5. During discovery in the above-captioned case, AUSA Paul V. Kelly has provided some of these logs. See copy of Master Security Log for October 17, 18, and 19, 1991 attached hereto as Exhibit A. See also copy of Associate/Contractor/Visitor Log produced by government attached hereto as Exhibit B. The subpoena requested is merely for the other logs in the Christian Science Church's possession. See Copy of Letter of Paul V. Kelly acknowledging said logs are not in the government's possession.

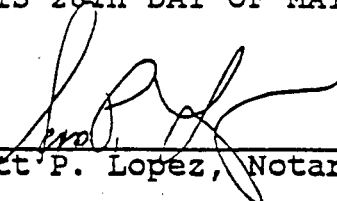
6. On or about May 28, 1992, I had a conversation with Richard Brown, Alfred Trenkler's former business partner relative to the business records of Advanced Research Communications (hereinafter "ARCOMM"). Initially he indicated that federal agents and Boston police officers had taken all of ARCOMM's records and that he had just gotten them back. He also indicated that he was more than willing to let us review the records so long as I contacted his attorney. Since this time, Mr. Brown has refused to voluntarily release any ARCOMM business records and will do so only if he is served a subpoena.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 28TH DAY OF MAY, 1993.



JAMES KAROLIDES

SWORN AND SUBSCRIBED BEFORE ME THIS 28TH DAY OF MAY, 1993.



Scott P. Lopez, Notary Public

My commission expires: 12/14/95

