

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA *
Plaintiff * CRIMINAL NO. 00-000
vs. *
DEFENDANT *
Defendant *
* * * * *

REQUEST FOR SPECIFIC DISCOVERY

TO THE HONORABLE COURT:

COMES NOW co-defendant, represented by the Federal Public Defender, and respectfully STATES and PRAYS:

1. The Trial in this case is currently set for March 27, 2001.
2. During the last hearing the Government advised of the possibility that some of the co-defendants will be called as witnesses at Trial
3. Under the doctrines of *Brady* and *Giglio*, it is requested that the Court Order the Government provide the following documents and information:
 - a. The name of each cooperating witness or source of information;
 - b. Any ledger, sheet, or other document which details the sum paid the cooperating witness or his family in this and other cases in which the informant assisted the government and the purpose of each such payment;
 - c. Any information, whether or not memorialized in a memorandum, agents's report or other writing, regarding promises of immunity, leniency, preferential treatment or other inducements made to the cooperating witness or any family member, friend or associate of the informant cooperating, including the dismissal or reduction of

charges, assisting in matters of sentencing or deportation, promises or expectations regarding payments for expenses or testimony or eligibility for any award or reward.

d. In addition to information regarding payments, promises of immunity, leniency, preferential treatment or other inducements made to the government witnesses, any records or information regarding payments, promises of immunity, leniency, preferential treatment offered or afforded to any family member, friend or associate of any prospective witness in exchange for said witness cooperation;

e. Any information or records concerning any actual or implied threats of investigation or prosecution (including deportation, exclusion, etc., by INS) made by the government to any prospective government witness or family member or associate of the witness, including information as to the underlying conduct precipitating such investigations;

f. Any report, document or information which details the criminal activities of the cooperating witness which were undertaken by him in the past, be it violations of federal, state or municipal laws;

g. Any report, document or information which details the criminal activities of the cooperating witness which were undertaken by him without the authority or approval of the government, but for which the government has elected, formally or informally, not to prosecute;

h. Information reflecting the nature and extent of assets obtained by the informant in connection with his illegal activities over the past ten years.

4. In order that the defense might adequately conduct its investigation, and given the nearness of the Trial date, it is requested that the Government be ordered to provide this information immediately.

WHEREFORE, plaintiffs respectfully request this Honorable Court to take notice of the above and Grant the request

I HEREBY CERTIFY that on today's date a copy of the foregoing Motion was served on counsel for the Government, U.S. Attorney Guillermo Gil (Attn: Assistant U.S. Attorney Michelle

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Morales) by delivering it to his office at the Federal Building, Carlos Chardón Avenue, San Juan,
Puerto Rico.

In San Juan, Puerto Rico, this March 19, 2001.

Joseph C. Laws, Jr.
Federal Public Defender

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