

2. Copies of the Defendant's prior criminal records, if any, within the possession, custody or control of the Government, the existence of which is known, or by the exercise of due diligence may become known to the United States Attorney.

3. Copies of any and all diagrams and charts the Government intends to use as evidence in the trial herein, both in its case in chief and its rebuttal.

4. A list of all tangible evidence which is within the possession, custody or control of the Government which are intended for use by the Government as evidence in chief at the trial; a list of all tangible evidence obtained from the Defendant or allegedly belonging to the Defendant which the Government intends to use as evidence in chief at the trial; and a list of all tangible evidence in the possession, custody or control of the Government which is material to the preparation of Defendant's case, so that Defendant can inspect, photograph and copy such objects.

5. Copies of any and all expert opinions, reports, tests, and examinations, scientific or otherwise, which are within the possession, custody, or control of the Government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the Government, and which are material to the preparation of the defense or are intended for use by the Government as evidence in chief at the trial.

6. The prior criminal records of any witnesses that the

Government intends to call at trial, including those offenses shown in the files of the Federal Bureau of Investigation or the files of local or state authorities, the existence of which is known, or by the exercise of due diligence may become known to the United States Attorney.

7. The name, identity and whereabouts of any informer who gave information leading to the arrest of the Defendant or Codefendant, and whether said informer was paid by the Government for such information.

The Defendant states that the information requested above is within the exclusive control of the United States Government and is essential to the Defendant's preparation for trial, as mandated by the due process clause of the United States Constitution, and is otherwise material to the preparation for the trial, Motion to Suppress and Motion to Sever as may later be set forth, and is reasonably requested with no great administrative burden on the United States Government.

WHEREFORE, this Defendant respectfully prays that this Honorable Court enter an Order:

1. Directing the above-requested discovery; and
2. Reserving the Defendant's right to supplement and amend this Motion as the disclosure of information provides further basis for relief.

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

:

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vs.

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:

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CERTIFICATE OF SERVICE

I hereby certify that on **, [REDACTED], I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following:

** , AUSA

P. O. Box 1858

Greensboro NC 27402

Respectfully submitted, this the ** day of **, [REDACTED].

[REDACTED]

Federal Public Defender

/s/ [REDACTED]

First Assistant Federal Public Defender

North Carolina State Bar No. [REDACTED]

Attorney for Defendant

101 S. Elm St., Suite 210

Greensboro, NC 27401

Telephone: (336) 333-5455

E-Mail: [REDACTED]