

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALFRED W. TRENKLER, Petitioner	)	
	)	CASE NUMBERS:
	)	M.J.-92-1252-B
VS.	)	M.J.-92-1253-B
	)	M.J.-92-1254-B
UNITED STATES OF AMERICA, Respondent	)	

AFFIDAVIT OF PETITIONER, ALFRED W. TRENKLER,  
IN SUPPORT OF MOTION TO RETURN PROPERTY

Now comes, Petitioner, Alfred W. Trenkler, and on my oath and personal knowledge hereby state the following:

1. I, Alfred W. Trenkler, am a life long resident of Massachusetts.

3. I am an Electronics Communication Engineer/Consultant doing business as Advanced Telecommunication Network Systems Research & Development (hereinafter ATNSR&D). My hourly rate is presently \$150.00 per hour.

4. On January 31, 1992, my home, office and the apartment of a friend was the subject of a search and seizure pursuant to a warrant executed by Agents Dennis Leahy, Thomas E. D'Ambrosio, and Allan Offringa of the United States Treasury Department Bureau of Alcohol, Tobacco & Firearms.

5. During the search of 133 Atlantic Street, Quincy, MA, an apartment owned by John Cates, the agents opened and searched the closed briefcase in my possession and seized business records identified in the return to the search warrant as "paperwork to include 3 notebooks, loose papers and twelve files." See Search

Warrant No. M.J.-92-1253-B, Item No. 9 attached to Motion to Return supra.

6. This paperwork is absolutely essential to my ongoing business relationships with various clients, including but not limited to, the Christian Science Church and Massachusetts Institute of Technology.

7. This paperwork contains information necessary to continue my contracts with these clients.

8. Unless this paperwork is returned I will not be able to complete the contracts that I am obligated to complete.

9. Without this paperwork I can not run my business.

10. My business has already been substantially affected by the seizure of this paperwork.

11. Specifically, I can not continue the performance of the Christian Science Air System contract until I obtain my calculations for the system which are contained within this paperwork. This paperwork contains work product that took numerous hours to produce and can not be reproduced without a similar effort.

12. Without this paperwork I can not even send out bills for services I have completed or pay my creditors the money I owe them because the documents contain my financial records.

13. Each and every day that I am without this paperwork, I am losing valuable time and money.

14. Some of files taken were entitled:

- a. George Damon;
- b. MIT;

- c. CCS;
- d. Appliance Man;
- e. Christian Science Air System;
- f. Notes various subjects;
- g. Advertising;
- h. Advanced Telecommunications;
- i. AT&S;
- j. Microwave bypass systems;
- k. HSE Communications.

15. Other files and paperwork contain notes for various jobs.

16. The notebooks contain important phone numbers, engineering plans and notes.

17. The loose paperwork removed from my brown leather case folder contains copies of invoices, billing information, notes, electronic manuals, calculations, etc.,...

18. In essence, the seizure of this paperwork has effectively put me out of business. Every day that goes by without this paperwork deprives me of my property, of running my business, of earning a living and of performing my business contracts.

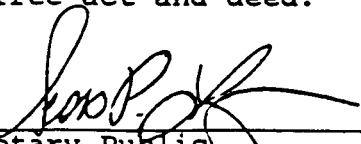
SIGNED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY THIS 6TH DAY OF FEBRUARY, 1992.

  
 \_\_\_\_\_  
 ALFRED W. TRENKLER

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

On this 6th day of February, 1992, before me personally appeared Alfred W. Trenkler, to me known to be the person described in and who executed the same as his free act and deed.

  
 \_\_\_\_\_  
 Notary Public  
 My commission expires:

