UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	CRIMINAL NO.: 92-10369-Z
	)	
	)	
THOMAS A. SHAY and	)	
ALFRED W. TRENKLER	)	

AFFIDAVIT OF SCOTT P. LOPEZ IN OPPOSITION TO GOVERNMENT'S MOTION *IN LIMINE* TO ADMIT EVIDENCE OF 1986 BOMBING

Now comes Scott P. Lopez on my oath, and do hereby depose and say the following:

1. I am a duly licensed attorney in the Commonwealth of Massachusetts, and a member of the Bar of the United States District Court for the District of Massachusetts.

2. I am also an associate in firm of Segal & Feinberg, located at 210 Commercial Street, Boston, MA 02109.

3. Terry Philip Segal, Esq. and I represent the defendant, Alfred W. Trenkler, in this case.

4. On or about June 10, 1993, the government submitted a memorandum of law in support of its motion *in limine* to admit evidence of the so-called "1986 Bombing".

5. Within said memorandum, the government alleges that it is prepared to prove at trial:

> That a computer-based analysis of over 14,000 bombings and attempted bombings occurring nationwide over a 12-year period (1979-1991) indicates that when **certain features are "queried" or compared** -- namely (1) bombings and attempted bombings, (2) remote control, (3) toggle switch, (4) cars and trucks, (5) affixed by circular

> magnet to undercarriage, (6) duct tape and (7) soldering wires -- **only two explosive devices from the entire 12-year nationwide computer database appear:** the 1986 device and the 1991 device. See Memorandum of Law In Support of Government's Motion In Limine To Admit Evidence of 1986 Bombing, pg. 2 (hereinafter "Government's Memorandum")(Emphasis added).

6. The government further alleges that it is prepared "to adduce testimony at trial from a representative of ATF's Explosives Incidents Systems (hereinafter "EXIS") Branch as to the nature of the **"detailed forensic information"** stored in the EXIS system ... and the manner and means of retrieval of such information for intelligence and investigative purposes." See Government's Memorandum pg. 9, (Emphasis added).

7. Finally, the government alleges that when the EXIS database was "... **'queried'**, that is, **programmed to search for** and identify all devices with features **determined to be common** to both the 1986 and 1991 bombings ... only two devices resulted...." Id. at pg. 9. The government alleges that its "... explosives expert will testify that the presence, in each device, of this combination of features, coupled with the similar *modus operandi*, amply demonstrates the **"signature"** quality of the devices." Id. at 10.

8. Thus, apparently the government intends to have its explosives expert rely upon the computer system's analysis in part to establish a signature in this case. This approach is both novel and unprecedented because implicit in the government's offer of proof is the admission that it will not rely upon a forensic or scientific comparison of the two subject devices to establish a signature. Rather, the government asks this Court to permit its

expert to rely upon the "certain features" "determined to be common" by someone which are contained within the EXIS computer to show that these two devices are "so idiosyncratic as to constitute a signature." See Ingraham v. United States, 832 F.2d 229, 233 (1st Cir. 1987). Presumably the government's explosives expert can not testify on the signature issue without the EXIS system's assistance.

9. Given the foundational importance of the EXIS system for the government's expert's opinion on this issue it is necessary to scrutinize the purpose and capabilities of the system, the nature or type of information stored on the system, and the manner in which information is stored in, and retrieved from, the system to conclude what, if any, value this system has in establishing a "signature" before the government should be permitted to have its expert rely upon this system to render an opinion on signature.

10. A common sense analysis of the government's contention indicates that the purpose and capabilities of the system do not support the government's contention. Moreover, the nature or type of information stored in the system is not "detailed forensic information" as alleged, but rather non-specific, generic and non-forensic information. Furthermore, the manner in which information is placed into the system is not complete, reliable, or accurate. Additionally, the manner in which the information is retrieved from the system is wholly dependent upon the information that is contained in the system. As a result, the value of this computer system to establish a signature is minimal at best. Permitting an

expert to rely upon this system as a basis for his or her opinion would only compound the difficulty with the government's approach.

11. Presumably the government will offer Stephen B. Scheid, Research Specialist at the Bureau of Alcohol, Tobacco and Firearms, to explain the nature of the EXIS System and who, according to materials provided by the government during discovery, apparently conducted the database search which is the basis for the government's approach. See Facsimile from Stephen B. Scheid dated 12/14/92 attached hereto as Exhibit A.

A. Purpose and Capabilities of the System.

12. It is a matter of common knowledge that any database computer program is only as reliable as the information that is contained in the system and the capabilities of the system. Given the materials provided by the government during discovery, it appears that the EXIS system's purpose and capabilities are not consistent with the government's purported use of the system in this case. The EXIS system, which is described by Mr. Scheid as a "database of explosives incidents" is inherently limited by the quality and amount of information that is placed in the system's memory.

13. In an article written by Mr. Scheid in the October, 1991, issue of *The Police Chief* magazine produced by the government during discovery, Mr. Scheid comments on the inherent limitation of the EXIS system. See Article entitled "Explosives Incidents System: A Computer Approach To Explosives Incidents" which is a part of Exhibit A above. Mr. Scheid states that the EXIS database

only contains information on "explosive incidents ... that are **investigated by or reported to ATF.**" Mr. Scheid also states that "many federal, state and local bomb squads contribute information", but he does not state that all federal, state and local bombs squads contribute information or that these agencies are required by law to contribute information. Thus, it is logical to conclude that all explosive incidents that are not "investigated by or reported to ATF" are not part of the EXIS database.

14. Moreover, contrary to the government's allegation that the EXIS system provides "signature" or identity evidence, Mr. Scheid, in the same article referred to above, states "These analyses provide investigators with **leads relative to trends, patterns, bomb components and modus operandi.**" Notably, Mr. Scheid does not state, as the government has alleged, that the system contains **"detailed forensic information"**. Thus, the purpose of the system is not to provide investigators with detailed forensic information, but rather, to provide investigators with leads for further investigation. Moreover, since explosives incidents investigated by local authorities and other federal agencies are not required to be reported to ATF, only if ATF investigates an incident or if an agency other than ATF reports the incident to ATF would information be placed into the EXIS system.

B. <u>The Nature Or Type Of Information Stored On The System</u>.

15. In addition, a careful examination of the information on the computer printouts from the EXIS system amply demonstrates that the nature or type of information is not "detailed forensic information". In fact, not one feature identified by the government is detailed or specific enough to provide any assistance in determining signature. For example, the category of "remote control" provides no detail as to the specific type of remote control component utilized (i.e., improvised v. manufactured; functional or non-functional or even the frequency used). Similarly, the category "toggle switch" does not identify the specific toggle switch used (i.e., model numbers, double throw v. single throw, toggle switch v. microswitch) or the manner in which it was used (firing system v. non-firing system). Clearly, the category of "duct tape" is not specific by any means and the category of "soldering wires" makes absolutely no distinction regarding whether the components as manufactured contained solder or whether the maker of the bomb utilized solder to build the device. Finally, the other three categories, namely "bombings and attempted bombings", "cars and trucks", and "circular magnet to undercarriage" are so hopelessly generic as to provide no assistance at all with respect to making a forensic comparison of one device to another.

C. Adding and Retrieving Information From EXIS System.

16. Implicit in the government's reliance upon this computer system as the basis for its expert's opinion is the assumption that the manner in which information is placed into system is reliable, accurate and complete. However, based on the information provided it does not appear that this is the case.

17. For example, the first assumption this Court must make is that federal, state and local agencies report explosives incidents to ATF even when ATF is not involved in investigation. As indicated above, this assumption is not necessarily valid.

18. The second assumption this Court must make about the information that is placed in the computer is that the individuals reporting incidents to ATF on the forms provided have both the knowledge and experience to accurately report the information in the proper category on the ATF forms. Obviously, local departments do not have officers who possess the background and qualifications of ATF agents and FBI agents with respect to explosives incidents.

19. In addition, as the forms provided by the government during discovery indicate, the ATF forms for reporting incidents are not detailed, and require a thorough knowledge of the EXIS Computer Codes, and their significance, to assure accuracy.

20. Moreover, there does not appear to be a uniform form which all agencies utilize to report explosives incidents as indicated by the three different forms provided by the government during discovery. Compare ATF Worksheet Form, FBI Incident Report Form, and ATF Incident Report Form attached hereto as Exhibit B.

21. Notwithstanding the above issues, of even greater significance is the **time** at which information is placed onto the computer system. For example, the government presumably would like to have this Court believe that when the computer search of the EXIS system was conducted in this case, the 1986 incident was identified as a match. A condition precedent for this factual conclusion would be that the 1986 was already on the EXIS database. However, a careful examination of the documents provided in this case would seem to indicate otherwise.

22. As a starting point, reference is again made to the article written by Mr. Scheid above. In this article Mr. Scheid explains how information is added to the EXIS system and retrieved from the system. He states:

> Information entered into EXIS, both general and specific, is **gleaned** from investigative and forensic examination reports. The **same input format** is used for all incidents .... **Entries are updated** as new information is developed. ***
>
> The computer system is designed to search and compare for device similarities as well as device placement on the target. *** The EXIS system can be queried in any combination of fields, and different fields can be queried at one time.

23. Mr. Scheid also provides an example of a typical search in this article. Using the example of an electrically initiated pipe bomb placed under the seat of a vehicle, he explains that the computer would be asked to search for four fields: "electrically initiated pipe bombs", "pipe bombs", "placement under the seat of a vehicle" and "vehicles".

24. The obvious mathematical fallibility of this system is that the greater number of "fields" the computer operator combines in his or her search determines the number of "matches" that will occur. For example, if one was to only search for the field "electrically initiated pipe bombs" ALL pipe bombs fitting this description would be retrieved. However, by combining the field of "placement under the seat of a vehicle", with "electrically initiated pipe bombs" ALL electrically initiated pipe bombs which were either not placed under the seat of a vehicle or not reported as being placed under the seat of vehicle are eliminated and therefore the number of matches is reduced.

25. The significance of this mathematical truth is that the number of fields queried can predetermine the number of matches retrieved. Thus, if one wanted to reduce the number of matches all one would have to do is increase the number of fields.

26. Applying this mathematical certainty to the case at hand it is obvious that by increasing the number of fields to include "bombings and attempted bombings", "remote control", "toggle switch", etc., the number of possible matches is reduced until only one match occurs. For this reason, the time at which the information is placed into the computer is a very important consideration in determining the accuracy and reliability of the system.

27. In this case, it appears that the 1986 incident was added to the EXIS database after the 1991 Roslindale incident. Specifically, a careful review of the June 1, 1993 computer

printout of nine (9) remote control devices[1] indicates that each device listed is assigned a six-digit number by the computer in the first column of the printout. See June 1, 1993 Computer Printout attached hereto as Exhibit C. For example, the first incident - Coral Gables, Florida - was assigned the number "027724". Moreover, each date of incident is listed on the printout. Upon information and belief, the six digit number appears to be a chronological number assigned by the computer at the time an incident is placed onto the computer. The only exception to this belief is the incident dated 6/12/87 in Horridge, IL. From the chronological numbers assigned to the 1986 and 1991 devices, it appears that the 1986 incident was added to the computer after the 1991 incident as more clearly indicated below.

Chronological Number	Date of Incident
006491	6/12/87[2]
012278	3/25/80
018147	10/15/85
021148	5/6/87
023191	3/10/89
027724	8/17/90
028949	2/18/91
031634	**10/28/91(Roslindale incident)**
033236	**9/1/86 (Quincy incident)**

[1]It should be noted that the government has provided computer printouts of only nine (9) explosives incidents even though the 1991 Explosives Incidents Report published by ATF identifies 125 radio remote controlled explosives incidents for the 5-year period from 1987 through 1991. See Table XI. Other Explosives Incidents, 1897-91, p. 22 attached hereto as Exhibit D. Moreover, the computer printout provided by the government during discovery identifies 147 remote control bombings for the period from January 1, 1979 to December 31, 1991. See Computer Printout attached hereto as Exhibit E.

[2]Unlike the other eight numbers which appear to be in numerical order, this incident in 1987 apparently was given a number by the computer which is out of order.

If in fact the 1986 incident was added to the computer after the Roslindale incident, the computer system could have been manipulated to make the 1991 device and the 1986 device appear to be similar.

28. In all likelihood it was not until Alfred Trenkler's beeper number was found on the person of Thomas A. Shay, Jr. that Trenkler became a suspect. Once Trenkler became a suspect, ATF agents or Boston Homicide officers learned of the 1986 incident. After the agents and officers learned of the 1986 incident the 1986 incident was added to the EXIS database. To date there is no evidence to suggest that the 1986 incident was either reported to, or investigated by ATF. Thus, the 1986 incident would not have been added to the EXIS system at any earlier point in time.

29. This time line is very significant because, assuming the 1986 incident was placed onto the EXIS system after the 1991 incident, so long as the 1986 incident was described in terms similar to the 1991 incident a match would result. Additionally, so long as enough fields were combined to exclude all other explosives incidents, the only devices that would appear similar by a computer search would be the 1986 and 1991 incident. Thus, once the 1986 device and 1991 device were described in similar terms, it would appear that out of 14,000 bombings and attempted bombings only two (2) matched. Now the government desires to premise its expert's opinion on this so-called "signature" evidence. However, common sense would seem to indicate that this "evidence" should be closely scrutinized.

30. It also appears from the documents provided that changing and updating specific inaccurate information has little or no effect on the match at issue. For example, the query search done on or about December, 14, 1992, indicates that toggle switch in the 1986 incident was listed as a Radio Shack toggle switch. The specific information on the December printout was "SW (Switch), RASH (Radio Shack), Toggle, Double Throw." See EXIS Codes for abbreviations. However, the June 1, 1993 printout for the 1986 incident has the toggle switch listed as "SW, UNKN (Unknown), Toggle, Double Throw". Thus, even though the December information regarding the 1986 incident was inaccurate and had to be updated, it did not affect the search results. This is true despite the fact that the 1991 incident is listed in both search printouts as "SW, RASH, Toggle, Archer SPST ("SPST" is an abbreviation for Single Pole, Single Throw switch). This inaccuracy and its lack of effect on the search demonstrates that: 1) inaccurate information does not necessarily affect the computer's results; and 2) differences in the more specific information about the components such as the manufacturer (Radio Shack) and the type of toggle switch (single throw v. double throw) also does not affect the outcome.

31. In fact, what is reasonable to conclude from this database is that so long as enough similar fields are placed onto the database when describing an explosives incident a computer operator can be assured of making two devices match when these fields are combined in a search. Moreover, despite all the other

dissimilarities between the two devices, so long as these dissimilarities are not "queried" or searched, they will have no affect on the search. This is true even though the 1991 device is listed as a "professional job" and the 1986 has no similar appellation.

32. Thus, even though of the nine (9) devices listed in the June 1, 1993 EXIS computer printout:

1. 9 of 9 devices had magnets;
2. 9 of 9 were affixed under vehicles;
3. 8 of 9 were placed by a person;
4. 7 of 9 were remote control;
5. 7 of 9 list wire (although none can be constructed without wire);
6. 5 of 9 used Futaba Remote Control (not 1986 incident)
7. 4 of 9 used glue (not 1986 incident);
8. 4 of 9 used wood (not 1986 incident);
9. 4 of 9 used blasting caps (not 1986 incident); and
10. 3 of 9 used box enclosures (not 1986 incident);

because only "certain features" "determined to be common" were "queried", the desired match resulted.

33. In sum, a common sense analysis of the government's contention indicates that the purpose and capabilities of the system do not support its argument. The computer's intended purpose is to establish leads for further investigation. It is not intended or designed to be relied upon to establish a signature. Moreover, the nature or type of information stored in the system is not "detailed forensic information" as alleged, but rather non-

specific, generic and non-forensic information. Furthermore, the manner in which information is placed into the system is not complete, reliable, or accurate and can be easily manipulated. Additionally, the manner in which the information is retrieved from the system is wholly dependent upon the information that is placed into and contained within the system. As a result, the value of this computer system to establish a signature is minimal at best. Thus, permitting an expert to rely upon this system as a basis for his or her opinion would not only compound the inadequacies of this system, but also would establish a dangerous precedent.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 19TH DAY OF JULY, 1993.

Scott P. Lopez

EXHIBIT
A

BUREAU OF ALCOHOL – TOBACCO & FIREARMS
EXPLOSIVES INCIDENTS SYSTEM

TO: FRANK LIBBY 617-223-4345

FROM: ATF/STEVE SCHEID/EXIS
FTS 927-8030 FAX 202/927-8115

SUBJECT: 6321292008C
QUESTIONS = STEVE SCHEID
202-927-8030

DATE: 12-14-92 NUMBER OF PAGES: 5

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
650 Massachusetts Avenue, NW
Washington, DC 20226

Room 7100 (202) 927-8030

I ALL BOMBINGS 1979-1991

TOTAL BOMBINGS 14,249
NUMBER KILLED 328
NUMBER INJURED 2345
PROPERTY DAMAGE $151,422,571

VEHICLE BOMBINGS 1979-1991

TOTAL BOMBINGS 2,652
NUMBER KILLED 81
NUMBER INJURED 326
PROPERTY DAMAGE $9,957,689

II A REMOTE CONTROL BOMBINGS 1979-1991

TOTAL BOMBINGS 145
NUMBER KILLED 13
NUMBER INJURED 47
PROPERTY DAMAGE $1,782,125

REMOTE CONTROL AUTO-TRUCK BOMBINGS 1979-1991

TOTAL BOMBINGS 62
NUMBER KILLED 12
NUMBER INJURED 31
PROPERTY DAMAGE $248,000

AFTER TRYING DIFFERENT COMBINATIONS OF QUERRIES ON THE COMPUTER THE FOLLOWING QUERY RESULTED IN THE TWO INCIDENTS.

QUERY:

DATE RANGE: 0179 - 1291

TYPES OF INCIDENTS: BOMBINGS AND ATTEMPTED BOMBINGS

TARGET INFORMATION: AUTOMOBILES / TRUCKS

DEVICE PLACEMENT: UNDER VEHICLE

DEVICE COMPONENTS: MAGNETS

COMPONENT MANUFACTURER: RADIO SHACK

MISCELLANOUS INFORMATION: DUCT (TAPE)
ROUND
SOLDERED
REMOTE CONTROL

QUERY RESULTS:

1. 9-1-86 QUINCY, MA. INCIDENT
2. 10-28-91 ROSLINDALE, MA. INCIDENT

SEE ATTACHED COMPUTER PRINTOUT

OUT OF 14,249 BOMBING INCIDENTS THE ABOVE QUERY RESULTED IN YOUR TWO INCIDENTS.

EXPLOSIVES INCIDENTS SYSTEM: A COMPUTER APPROACH TO EXPLOSIVES INCIDENTS

By Stephen B. Scheid
Research Specialist,
Bureau of Alcohol, Tobacco and Firearms

The current trends in bombings indicate a total disregard for the lives and property of intended victims, as well as innocent bystanders. ATF is committed to curbing this wanton disregard for life and property and apprehending those who perpetrate violence through the criminal misuse of explosives. This has been and will remain a number one priority for ATF.

ATF strives to increase the investigator's ability to investigate bombings and other explosives incidents as quickly as possible in order to remove the threat to society. Toward this end, ATF committed its resources and established programs to enhance and expand the capabilities of field agents as well as other federal, state and local law enforcement officers.

The Explosives Incidents System (EXIS) data base, maintained on a mainframe computer in Washington, was implemented in 1975 to store information on explosives incidents nationwide that are investigated by or reported to ATF. With many federal, state and local bomb squads contributing information, the result is a very comprehensive data base of explosives incidents.

Currently, 39,000 incidents are stored in EXIS, of which 18,000 are bombings. Other types of incidents are stolen and recovered explosives, hoax devices, accidental explosions, threats to Treasury facilities and ATF arson investigations.

Information entered into EXIS, both general and specific, is gleaned from investigative and forensic examination reports. The same input format is used for all incidents, enabling ATF to compare explosives used in bombings to explosives thefts and recoveries. Entries are updated as new information is developed. The information is regularly made available to the explosives ordnance community, and is provided to the FBI and Secret Service on a daily basis.

The nucleus of the EXIS data base is built around target and device component information. The computer system is designed to search and compare for device similarities as well as device placement on the target. An example would be an electrically initiated pipe bomb placed under the seat of a vehicle. Here, the computer would be asked to search for four fields: "electrically initiated pipe bombs," "pipe bombs," "placement under the seat of a vehicle" and "vehicles." The EXIS system can be queried in any combination of fields, and different fields can be queried at one time.

These queries are extremely important to investigators, especially today when criminals can travel around the country quickly and use explosives to further their illicit activities. Data stored in EXIS can be queried and retrieved for analysis within hours of a bombing or other explosives incident. These analyses provide investigators with leads relative to trends, patterns, bomb components and modus operandi. With this type of information available, investigators can run down existing leads and develop new ones in hours. Before EXIS, the same work would have required weeks or months.

Information derived from these analyses is also used to develop probable cause for investigators of explosives-related violence. The system has data on explosives and devices used by terrorists, outlaw motorcycle gangs, organized crime figures, street gangs, juveniles, drug suspects and other crime groups active throughout the United States. In addition, EXIS has been used to provide intelligence in support of security for significant events such as the Olympics, world fairs, the Goodwill Games and political conventions.

EXIS provides ATF with a successful investigative and managerial tool. The analyses it generates have produced results that are both exciting and gratifying. Its capabilities continue to evolve, providing investigators with state-of-the-art technology that enhances their enforcement endeavors. More importantly, EXIS continues to promote an active exchange of information within the law enforcement and intelligence communities—a strong indicator of the determination and commitment that exists to stem criminal violence associated with explosives.

Reprinted with permission from *The Police Chief* magazine (IACP) October 1991.

DATE RANGE →

PERIOD COVERED: 790101-911231

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
EXPLOSIVE INCIDENTS LISTING
*** STATE--CITY ***

DATE: 12/14/92 PAGE: 1

CARD1: / CARD2:	UI	DATE	TYP	NAME	EM	MID	MFG	MISC-INFO	CITY	ST	FAC QTY	LOC LN	DEL MID	WRN DAI	MOT PCT	KIL WLN	INJ CO	DAMAGE SHIFT-LOT	TIM	ANAL BP	PHO	JUR LT
033236 001	632008611001	090186	B						QUINCY	MA	FK	UV	P								S	L
033236 001 001						SI	MILI	M21			00000U											
033236 001 002						WI	UNKN	26 AWG			00000U											
033236 001 003						BT	RAYO	AA			00004E											
033236 001 004						RA	UNKN	TYCO			00000U											
033236 001 005						FD	UNKN	REMOTE CONTROL			00000U											
033236 001 006						UU	UNKN	SOLDERED			00000U											
033236 001 007						BT	DURA	6 VOLT			00002E							SIZE J 7K67				
033236 001 008						SW	RASH	TOGGLE			00000U							DOUBLE THROW				
033236 001 009						WI	UNKN	22 AWG			00000U											
033236 001 010						TP	UNKN	BLACK VINYL			00000U											
033236 001 011						MG	UNKN	ROUND			00000U			345				SPEAKER				
033236 001 012						UU	UNKN	MSP LAB NO F861210			00000U							DATED 112086				
033236 001 013						MG	UNKN	SPEAKER			00000U							ROUND				
033236 001 014						TP	UNKN	DUCT			00000U							ALUMINUM COLORED				
031634 001	632129220040	102691	B	SHAY THOMAS L					ROSLINDALE	MA	AU	UV	P		H	01	01		02P	A	A	A
031634 001 001						BX	UNKN	PLYWOOD			00001E	12	06					HOMEMADE				
031634 001 002						BX	UNKN				00001E	04	02					GLUED TO BOX				
031634 001 003						MG	UNKN	ROUND			00012E			010				BALANCE				
031634 001 004						MG	UNKN	DONUT SHAPE			00002E			035				SPEAKER				
031634 001 005						WI	UNKN	ANTENNA			00000U											
031634 001 006						CE	AUST	ROCKSTAR			00002E						RY					
031634 001 007						BY	ATLA				00000U											
031634 001 008						TP	UNKN	BLACK ELECTRICAL			00000U											
031634 001 009						TP	UNKN	DUCT			00000U							SILVER				
031634 001 010						ML	UNKN	USED TO MAKE BOX			00000U											
031634 001 011						MX	UNKN	GLUE			00000U											
031634 001 012						UU	UNKN	SOLDERED			00000U							PROFESSIONAL JOB				
031634 001 013						BT	DURA	9 VOLT			00005E											
031634 001 014						BT	UNKN	AA			00003E											
031634 001 015						SW	UNKN	SLIDE			00000U											
031634 001 016						RA	UNKN	FUTABA			00000U											
031634 001 017						FD	UNKN	REMOTE CONTROL			00000U											
031634 001 018						UU	UNKN	PAINTED			00000U							PAINTED BLACK				
031634 001 019						NR	UNKN	NATIONAL RESPONSE			00000U											
031634 001 020						UU	UNKN	PEER SUPPORT			00000U											
031634 001 021						UU	UNKN	POLICEMAN KILLED			00000U											
031634 001 022						SW	RASH	TOGGLE			00000U							ARCHER SPST				
031634 001 023						TP	UNKN	FIBER REINFORCED			00000U											
031634 001 024						PA	UNKN	MAGAZINE PAGE			00000U							MUSCLEMAG INTERN				

NUMBER OF CASES: 2

NUMBER OF DETAIL RECORDS: 38

EXHIBIT

B

TABBIES

DEPARTMENT OF THE TREASURY – BUREAU OF ALCOHOL, TOBACCO AN

EXPLOSIVES INCIDENT WORKSHEET

CARD 1

(1-13) UNIQUE IDENTIFIER	(14-19) DATE OF INCIDENT	(20) TYPE OF INC
(21-39) VICTIMS NAME		
(40-53) CITY	(54-55) STATE	(56-57) SPECIFIC FACILIT
(58-59) SPECIFIC LOCATION	(60) DELIVERY METHOD	(61) WARNING
(62) MOTIVE INTENT	(63-64) NUMBER KILLED	(65-66) NUMBER INJURE
(67-73) AMOUNT OF DAMAGE	(74-76) TIME OF OCCURRENCE	(77) EVIDENCE ANALYZED
(78) PHOTOS TAKEN	(79) JUF DICTIO	

CARD 2

(1-13) UNIQUE IDENTIFIER	(14) ENTRY METHOD	(15-16) MISC. IDENT. CODE	(17-20) MANUFACTURE
		M G	

(21-40) MISCELLANEOUS INFORMATION

R O U N D E C O N T O L

(41-46) QUANTITY	(47-48) LENGTH	(49-50) WIDTH	(51-53) DIAMETER	(54-55) PER

(56-58) LEG WIRE LENGTH	(59-60) COLOR	(61-76) DATE SHIFT CODE/LOT NUMBER

(77) BOMB PROFILE CODE	(78) LAB/TECH CODE

ATF F 3270.10 (10-76)

INCIDENT REPORT

Return To:

FBI Bomb Data Center
Forensic Science Research and Training Center, Building 12
FBI Academy Quantico, Virginia 22135

RE:

The following information is submitted in connection with *(check applicable item)*:

- ☐ Actual or attempted explosive bombing *(complete all items)*
- ☐ Actual or attempted incendiary bombing *(complete all items)*
- ☐ Hoax device *(complete items A, B, C, J, K, L, M, N, O, P & S)*
- ☐ Recovery of device *(complete items A thru F and O thru S)*

A. Occurrence *(complete each blank)*

1. Date _____ 2. Day of week _____
4. Location: a. Office of Origin _____
   b. City of occurrence _____
   c. County of occurrence _____
   d. State of occurrence _____
   e. NCIC agency identifier _____

3. Time *(check one)*
   a. ☐ 12:01 am to 6:00 am
   b. ☐ 6:01 am to noon
   c. ☐ 12:01 pm to 6:00 pm
   d. ☐ 6:01 pm to midnight

B. Nature of Incident *(check one)*

1. ☐ Actual bombing 2. ☐ Attempted bombing 3. ☐ Hoax device 4. ☐ Recovery of device

C. Nature of Device

1. ☐ *Explosive* _____ (number)
   a. ☐ Improvised
   b. ☐ U.S. Military Ordnance
      1. ☐ Grenade
      2. ☐ Projectile
      3. ☐ Training simulator
      4. ☐ Other (specify)_____
   c. ☐ Foreign Military
   d. ☐ Unknown

2. ☐ *Incendiary* _____ (number)
   a. ☐ Molotov cocktail
      1. ☐ Self-igniting
      2. ☐ Wick
   b. ☐ U.S. Military
      1. ☐ Grenade
      2. ☐ Projectile
   c. ☐ Foreign Military
   d. ☐ Other (specify)_____
   e. ☐ Unknown

3. ☐ Hoax _____ (number)

D. Fuzing

1. *Explosive*
   a. ☐ Type
      1. ☐ Electrical
      2. ☐ Nonelectrical
      3. ☐ Unknown
   b. ☐ Initiation (triggering)
      1. ☐ Delay
      2. ☐ Booby trapped/action
      3. ☐ Command-remote control
      4. ☐ Unknown
   c. ☐ Functioning
      1. ☐ Impact
      2. ☐ Clock/mechanical delay
      3. ☐ Burning delay
      4. ☐ Chemical delay
      5. ☐ Electrical/electronic delay
      6. ☐ Pressure/pressure release
      7. ☐ Pull/push
      8. ☐ Unknown

2. *Incendiary*
   a. ☐ Delay
   b. ☐ Impact
   c. ☐ Booby trapped
   d. ☐ Unknown

E. Filler (Indicate type of explosive and check numbered item only if known)

1. *Explosive*
   a. ☐ Low explosive
      1. ☐ Black powder
      2. ☐ Smokeless powder
      3. ☐ Match heads
      4. ☐ Pyrotechnics/fireworks
      5. ☐ Other (specify)_____

2. *Incendiary*
   a. ☐ Gasoline
   b. ☐ Pyrotechnics/fireworks
   c. ☐ Propane, butane, etc.
   d. ☐ Other flammable solid
   e. ☐ Other flammable liquic
   f. ☐ Unknown

F. External Container
1. ☐ Pipe/Metal tube
2. ☐ Nonmetal tube
3. ☐ Bottle
4. ☐ Box
5. ☐ Bag
6. ☐ Can
7. ☐ Military device
8. ☐ Unknown
9. ☐ None
10. ☐ Other (specify)_____

G. Placement of Device
(complete for structures omitting residential property)
1. ☐ In secured area
2. ☐ In public access area

Specify location _____

H. Delivery of Device
1. ☐ Mailed/shipped
2. ☐ Placed
3. ☐ Thrown or projected
4. ☐ Unknown

I. Damage
1. ☐ Personal injury (total number of persons) _____: distribute total to items below:
   a. ☐ firemen _____
   b. ☐ intended victims _____
   c. ☐ innocent bystanders _____
   d. ☐ police _____
   e. ☐ subjects _____
   f. ☐ others (specify) _____
2. ☐ Deaths (total number of persons) _____: distribute total to items below:
   a. ☐ firemen _____
   b. ☐ intended victims _____
   c. ☐ innocent bystanders _____
   d. ☐ police _____
   e. ☐ subjects _____
   f. ☐ others (specify) _____
3. ☐ Amount of property damaged $ _____: distribute total to items below:
   a. ☐ to intended target $ _____
   b. ☐ to surrounding area $ _____

J. Nature of Target *(check applicable item)*

RESIDENCE
1. ☐ Apartment house
2. ☐ Private residence
3. ☐ Other private property

COMMERCIAL OPERATION
4. ☐ Bank
5. ☐ Hotel or motel
6. ☐ Industrial building
7. ☐ Office building
8. ☐ Theater
9. ☐ Other commercial building

VEHICLE
10. ☐ Aircraft
11. ☐ Automobile
12. ☐ Other vehicle

GOVERNMENT PROPERTY
13. ☐ Federal
14. ☐ State
15. ☐ Local

COMMUNICATION FACILITY
16. ☐ Radio
17. ☐ TV
18. ☐ Telephone
19. ☐ Other_____

TRANSPORTATION FACILITY
20. ☐ Airport
21. ☐ Bridge
22. ☐ Highway
23. ☐ Other_____

LAW ENFORCEMENT
24. ☐ Building
25. ☐ Vehicle
26. ☐ Other _____

OTHER TARGETS
27. ☐ FBI
28. ☐ Fire department
29. ☐ School facility
30. ☐ Person
31. ☐ Power facility
32. ☐ Other public utility
33. ☐ Recreation facility
34. ☐ Construction site or equipment
35. ☐ Postal facility or equipment
36. ☐ Church
37. ☐ Military facility
38. ☐ Hospital or medical facility
39. ☐ Newspaper facility
40. ☐ International establishment
41. ☐ Open area
42. ☐ Unknown (premature detonation)
99. ☐ Other (specify)_____

K. Was Incident Preceded by Threat or Warning?

1. ☐ No
2. ☐ Yes *(If "yes" check appropriate category)*

WRITTEN
- a ☐ Mailed
- b ☐ Unmailed *(i.e., note, etc.)*

SPOKEN
- c. ☐ Telephone
- d. ☐ Personally
- e. ☐ Other (specify)_____

L. If PRECEDED by Threat or Warning, Who Received It? *(check only if preceded)*

1. ☐ FBI
2. ☐ Other Law Enforcement Agency
3. ☐ News Media
4. ☐ Employee
5. ☐ Victim
6. ☐ Other (specify)_____

M. Appears to Involve

1. ☐ Juvenile
2. ☐ Racketeer
3. ☐ Acquaintance/Relative
4. ☐ Labor Organizational Member
5. ☐ Extremist (Foreign)
6. ☐ Extremist (Political)
7. ☐ Extremist (Racial)
8. ☐ Unknown
9. ☐ Other (specify)_____

N. Apparent Motive

1. ☐ Personal Animosity
2. ☐ Monetary Gain
3. ☐ Intimidation
4. ☐ Mischief
5. ☐ Publicity
6. ☐ Revenge
7. ☐ Sabotage/Subversion
8. ☐ Protest
9. ☐ Vandalism
10. ☐ Unknown
11. ☐ Other (specify)_____

O. Disposition of Device *(complete only if device failed to detonate, i.e., attempt, hoax, recovery)*

1. ☐ Dismantled in place
2. ☐ Detonated in place
3. ☐ Taken to safe area and dismantled
4. ☐ Taken to safe area and detonated
5. ☐ Other (specify)_____

P. Personnel Involved in Disposition of Device *(complete only if device failed to detonate, i.e., attempt, hoax, recovery)*

1. ☐ Trained technician
   - a ☐ Public Safety
   - b. ☐ Military
   - c ☐ Combination military/public safety
2. ☐ Other (specify)_____

Q. FBI Participation *(check if applicable)*

FBI Investigated as.

1. ☐ Bomb threat (section 844)
2. ☐ EID
3. ☐ DAMV
4. ☐ Other (specify)_____

R. Subjects Identified

1. ☐ No
2. ☐ Yes

Total _____ (number)

S. Brief Narrative Statement *(brief description of device and circumstances of incident)*

T. Usual Properties or Characteristics of Device *(complete only if applicable)*

<45

K S A R & EXPLOSIVE/ARSON INCIDENT REPORTS FORMAT

FM: ATF Boston District

TO: Chief, _____ Division (ENTER APPROPRIATE DIVISION FIREARMS, EXPLOSIVES, ETC.)

ATTN: SAC, _____ Branch (ENTER APPROPRIATE BRANCH)

SUBJ: KSAR Significant/Sensitive Report ( )
Explosives/Arson Incident Report ( )

(A) Incident: (BRIEF EXPLANATION OF CIRCUMSTANCES, SUCH AS ARREST, SEARCH WARRANT, EXPLOSIVES RECOVERY, ETC.)

_____

(B) Date of Incident: _____ (BB) Time of Incident: _____

(C) Major Publicity: NO ( )
YES ( ); MEDIA INQUIRIES ( ) PRESS RELEASE (

(D) IN: _____ (ENTER APPROPRIATE INVESTIGATION NUMBE

(DD) Monitor Number: _____ (ENTER HQS MONITOR NUMBER, IF ASSIGNED, IF NOT - ENTER N/A)

(E) Location: (ENTER LOCATION WHERE INCIDENT OCCURRED)

_____

(F) Special Agent: _____ (ENTER NAME OF S/A SUBMITTING)

(FF) Telephone Number: FTS/_____ (ENTER FTS TELEPHONE NUMBE

(G) Subject(s) Name/DOB: (ENTER SUBJECT(S) OF ARREST, SEARCH WARRANT, ETC., IF UNKNOWN, PUT UNKNOWN)

_____

_____

(GG) Address: (ENTER SUBJECT(S) ADDRESS(ES). IF UNKNOWN, PUT UNKNOWN. IF MORE THAN ONE SUBJECT, LIST EACH SEPARATELY)

_____

_____

(GGG) Prior Criminal Record: (CONVICTIONS/ARRESTS/REPUTATION IF KNOWN. IF UNKNOWN, PUT UNKNOWN.)

_____

_____

(H) Current Venue: (ENTER APPROPRIATE FEDERAL JUDICIAL DISTRICT)

(HH) Charges: (ENTER NARRATIVE DESCRIPTION OF APPROPRIATE FEDERAL AND/OR STATE CHARGES.)

(I) Other Agencies Involved: (LIST AS APPROPRIATE)

(J) Property in Custody: (ENTER PROPERTY TAKEN INTO ATF CUSTODY ONLY)

* * * *ITEMS (K) THROUGH (W) ARE FOR EXPLOSIVE/ARSON REPORTING* * * *
* * * *MAY BE DELETED FOR KSAR SIGNIFICANT/SENSITIVE REPORTING* * * *

PLEASE COMPLETE ALL ITEMS - ENTER N/A IF NECESSARY

(K) Victim/Target: (MAY BE EITHER INDIVIDUAL OR PROPERTY)

(KK) Owner (If known):

(L) Extent & Date of ATF Involvement:

(LL) NRT Used: NO ( ) YES ( ); Details:

(M) I.D. of Person(s) Killed/Injured: (NAME/ADDRESS/DOB, IF KNOWN)

(MM) Extent of Injuries: (AS APPROPRIATE)

(N) Warning: NO ( ) YES ( ); Details: _____

_____

(O) Motive: (IF KNOWN OR APPARENT) _____

_____

(P) Method of Delivery: (APPLIES PRIMARILY TO BOMBING/ARSON INCIDEN

_____

(Q) Method of Initiation: _____

_____

(QQ) Device Components: _____

_____

(R) Magazine Type: (ENTER DESCRIPTION) _____

_____

(RR) How Was Entry Made: (IF KNOWN OR APPARENT)

_____

_____

(S) Licensee/Permitee: NO ( ) YES ( ); Number: _____

(T) Quantity and Type of Explosive/Accelerant: (IF KNOWN)

_____

_____

_____

(U) Monetary Amount of Loss: (VALUE OF PROPERTY, EXPLOSIVES, ETC.)

_____

(V) Person/Agency Notifying ATF and When: _____

_____

(W) FBI Notified: NO ( ) YES ( ); NAME, DATE AND BY WHOM:

_____

_____

(X) Narrative; (GIVE CONCISE BUT COMPLETE DESCRIPTION OF INCIDENT)

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS

PERIOD COVERED: 790101-911231 — EXPLOSIVE INCIDENTS LISTING — DATE: 06/01/93 PAGE: 1

*** UI-INCIDENT ***

CARD1: / CARD2:	UI	DATE	TYP	NAME / EM	CITY / MIO	ST / MFG	FAC / MISC-INFO	LOC	DEL	WRN	MOT	KIL	INJ	DAMAGE	TIM	ANAL	PHO	JUR / BP	LT
027724 001	13222902552F	081790	B	CONDOM GIL FRANCISC	CORAL GABLES	FL	AU	UV	P		H		05	0030000	04P	A		A	
027724 001 001					DR	UNKN	COCAINE							00000U					
027724 001 002					RA	UNKN	KO PROP HI SELECTIVE							00000U					
027724 001 003					FO	UNKN	REMOTE CONTROL							00000U					
027724 001 004					MG	UNKN	DONUT							00000U					
027724 001 005					UU	UNKN	WOODEN BOARD							00000U					
027724 001 006					TP	UNKN	FILAMENT							00000U					
027724 001 007					BT	EVER	AA							00004E					
027724 001 008					UU	UNKN	VELCRO							00000U					
027724 001 009					RO	UNKN								00000U					
027724 001 010					UU	UNKN	WOODEN BOARD							00000U					
027724 001 011					CE	UNKN	MINING OPERATIONS							00000U					
027724 001 012					WI	UNKN	ANTENNA							00000U					
027724 001 013					SW	UNKN	SLIDE							00000U					
027724 001 014					WX	UNKN	GLUE							00000U					
027724 001 015					BN	UNKN	MOUNTING PLATE							00000U					
006491 001	331148720501	061287	B	DUNNE RICHARD	NORRIDGE	IL	AU	UV	P		H		01		04P	A		A	
006491 001 001					BP	UNKN								00000U					
006491 001 002					BT	EVER	C							00000U					
006491 001 003					BT	EVER	6 VOLT							00000U					
006491 001 004					FO	UNKN	REMOTE CONTROL							00000U					
006491 001 005					MG	UNKN	HORSESHOE							00004E					
006491 001 006					MO	UNKN	PENNY							00001E					
006491 001 007					PI	UNKN	PVC							00001E	24		040		
006491 001 008					RA	UNKN	FUTABA							00000U					
006491 001 009					TP	UNKN	PLASTIC PACKAGING							00000U					
006491 001 010					TP	UNKN	BLACK PLASTIC							00000U					
006491 001 011					WI	UNKN	LAMP CORD							00000U					
006491 001 012					UU	UNKN	SOLDERED							00000U					
006491 001 013					WX	UNKN	GLUE							00000U					
006491 001 014					UU	UNKN	WOOD PANELING							00000U					
006491 001 015					BN	UNKN	CONNECTOR LUGS							00000U					
012278 001	441903808005T	032580	N	CUBAN AMBASSADOR	NEW YORK CITY	NY	AU	UV	P	C	P								
012278 001 001					BG	UNKN								00000U					
012278 001 002					BT	EVER								00002E					
012278 001 003					BX	UNKN	SHOE							00000U					
012278 001 004					CE	DUPO	NO 6							00002E					
012278 001 005					C4	MILI								00004L					
012278 001 006					DT	ENBI								00001F					
012278 001 007					FO	UNKN	REMOTE CONTROL							00000U					
012278 001 008					GS	XXXX	OMEGA SEVEN							00000U					
012278 001 009					MG	UNKN	MAGNETS							00000U					
012278 001 010					RA	UNKN	FUTABA							00000U					
012278 001 011					WI	UNKN								00000U					
028949 001	532109110331	021891	B	KEYS DARYL	ALBUQUERQUE	NM	AU	UV	P		R			0004000	09A	A		A	

EXHIBIT C

CARD1: / CARD2:	UI	DATE	TYP	NAME	EM	MID	MFG	MISC-INFO	CITY / QTY	ST	FAC	LOC	DEL	WRN	HOT	KIL	INJ	DAMAGE	TIM	ANAL	PND	JUR / SHIFT-LOT	SP	LT
028949 001 001						PI	UNKN		00002E			08						015						
028949 001 002						BT	DURA	12 VOLT	00001E															
028949 001 003						WI	UNKN		00000U															
028949 001 004						SP	UNKN		00000U															
028949 001 005						BN	UNKN	HOSE CLAMP	00000U															
028949 001 006						MG	UNKN		00000U															
028949 001 007						FB	UNKN	MINIATURE LAMP	00000U															
028949 001 008						CK	UNKN	TIMING DELAY	00000U															
028949 001 009						BT	DURA	12.6 VOLT	00000U															
028949 001 010						TP	UNKN	DUCT	00000U															
028949 001 011						SW	UNKN	TOGGLE	00000U															
033236 001	632008611001	090186	B						QUINCY	MA	TK	UV	P										$	L
033236 001 001						SI	MILI	M21	00000U															
033236 001 002						WI	UNKN	26 AWG	00000U															
033236 001 003						BT	RAYO	AA	00004E															
033236 001 004						RA	UNKN	FYCO	00000U															
033236 001 005						FD	UNKN	REMOTE CONTROL	00000U															
033236 001 006						UU	UNKN	SOLDERED	00000U															
033236 001 007						BT	DURA	6 VOLT	00002E														SIZE J 7K67	
033236 001 008						SW	UNKN	TOGGLE	00000U														DOUBLE THROW	
033236 001 009						WI	UNKN	22 AWG	00000U															
033236 001 010						TP	UNKN	BLACK VINYL	00000U															
033236 001 011						MG	UNKN	ROUND	00000U									045					SPEAKER	
033236 001 012						UU	UNKN	MSP LAB NO F861210	00000U														DATED 112086	
033236 001 013						MG	UNKN	SPEAKER	00000U														ROUND	
033236 001 014						TP	UNKN	DUCT	00000U														ALUMINUM COLORED	
031634 001	63212922008C	102891	B	SHAY THOMAS L				ROSLINDALE	MA	AU	UV	P			H	01	01						02P A	A A
031634 001 001						BX	UNKN	PLYWOOD	00001E	12	06												HOMEMADE	
031634 001 002						BX	UNKN		00001E	04	02												GLUED TO BOX	
031634 001 003						MG	UNKN	ROUND	00012E									010					BALANCE	
031634 001 004						MG	UNKN	DONUT SHAPE	00002E									035					SPEAKER	
031634 001 005						WI	UNKN	ANTENNA	00000U															
031634 001 006						CE	AUST	ROCKSTAR	00002E													RY		
031634 001 007						BT	AMER		00000U															
031634 001 008						TP	UNKN	BLACK ELECTRICAL	00000U															
031634 001 009						TP	UNKN	DUCT	00000U														SILVER	
031634 001 010						ML	UNKN	USED TO MAKE BOX	00000U															
031634 001 011						WX	UNKN	GLUE	00000U															
031634 001 012						UU	UNKN	SOLDERED	00000U														PROFESSIONAL JOB	
031634 001 013						BT	DURA	9 VOLT	00005E															
031634 001 014						BT	UNKN	AA	00003E															
031634 001 015						SW	UNKN	SLIDE	00000U															
031634 001 016						RA	UNKN	FUTABA	00000U															
031634 001 017						FD	UNKN	REMOTE CONTROL	00000U															
031634 001 018						UU	UNKN	PAINTED	00000U														PAINTED BLACK	
031634 001 019						NR	UNKN	NATIONAL RESPONSE	00000U															
031634 001 020						UU	UNKN	PEER SUPPORT	00000U															
031634 001 021						UU	UNKN	POLICEMAN KILLED	00000U															

CARD1: / CARD2:	UI	DATE	TYP	NAME / EM	CITY	ST	FAC / QTY	LOC	DEL	WRN	MOT	KIL	INJ	DAMAGE	TIM	ANAL	PHO	JUR / BP	CT
031634 001 022				SW RASH	TOGGLE		00000U							ARCHER SPST					
031634 001 023				TP UNKN	FIBER REINFORCED		00000U												
031634 001 024				PA UNKN	MAGAZINE PAGE		00000U							MUSCLEMAG INTERN					
018147 001	634538630001R	101585	B	GORDON HARRIET	PHILADELPHIA	PA	AU UV			R		01		0001000	08P	A		A	
018147 001 001				BP UNKN			00000U												
018147 001 002				BT OURA	AA		00006E												
018147 001 003				FD UNKN	REMOTE CONTROL		00000U												
018147 001 004				MG UNKN			00000U												
018147 001 005				MR UNKN			00000U												
018147 001 006				RA UNKN	FUTABA		00000U												
018147 001 007				SW UNKN	TOGGLE		00000U												
018147 001 008				TP UNKN	BLACK ELECTRICAL		00000U												
018147 001 009				TU UNKN	COPPER		00000U	06											
018147 001 010				WI UNKN			00000U												
018147 001 011				WX UNKN	GLUE		00000U												
023191 001	931608935291	031089	B	ROGERS WILL	SAN DIEGO	CA	TK UV	P		H					08A			A	
023191 001 001				PI UNKN			00000U	12		020									
023191 001 002				BT EVER	6 VOLT		00000U												
023191 001 003				MG UNKN			00000U												
023191 001 004				WW UNKN	WOODEN BOARD		00000U												
023191 001 005				TP UNKN	DUCT		00000U												
023191 001 006				TP UNKN	ELECTRICAL		00000U												
023191 001 007				SP HERC	BLUE DOT		00000U												
023191 001 008				CE UNKN			00000U												
023191 001 009				SW UNKN	THERMAL		00000U												
021148 001	932608750278	050687	B	ANDREWS STEVEN J	CAMPBELL	CA	AU UV	P						0003000	03A	A		A	
021148 001 001				BT UNKN			00000U												
021148 001 002				BX UNKN	CARDBOARD		00000U												
021148 001 003				FD UNKN	REMOTE CONTROL		00000U												
021148 001 004				MG UNKN	HORSESHOE		00000U												
021148 001 005				PI UNKN			00000U	08		025									
021148 001 006				RA UNKN	FUTABA		00000U												
021148 001 007				BP UNKN			00000U												

NUMBER OF CASES: 9

NUMBER OF DETAIL RECORDS: 117

TABLE XI.--OTHER EXPLOSIVES INCIDENTS, 1987-91

	1987	1988	1989	1990	1991	5-YEAR TOTAL
DRUG-RELATED EXPLOSIVES INCIDENTS						
BOMBINGS	4	25	47	45	40	161
ATTEMPTED BOMBINGS	2	3	15	6	9	
INCENDIARY	1	8	17	16	22	
ATTEMPTED INCENDIARY	0	2	2	7	1	
TOTAL	7	38	81	74	72	
KILLED	1	4	13	1	2	
INJURED	18	21	17	13	22	91
PROPERTY DAMAGE	$1,000,000	$299,500	$701,800	$4,487,400	$287,050	$6,775,750
RECOVERED EXPLOSIVES INCIDENTS	26	103	158	143	166	596
POUNDS OF EXPLOSIVES	224	384	877	8033	973	10491
NUMBER OF DETONATORS	116	255	417	623	584	1995
GRENADES	0	38	91	143	90	362
SIMULATORS	3	13	25	53	23	117
ILLEGAL FIREWORKS EXPLOSIONS						
EXPLOSIONS	5	3	2	2	2	14
KILLED	1	1	3	1	0	6
INJURED	8	2	19	2	6	37
PROPERTY DAMAGE	$151,000	$195,000	$1,000,000	$0	$20,000	$1,366,000
LEGAL FIREWORKS EXPLOSIONS						
EXPLOSIONS	6	3	2	4	3	18
KILLED	2	1	2	2	3	10
INJURED	31	5	1	12	4	53
PROPERTY DAMAGE	$11,000	$145,000	$2,000	$1,058,000	$7,000	$1,223,000
OUTLAW MOTORCYCLE GANG EXPLOSIVES INCIDENTS						
BOMBINGS	11	16	7	8	10	52
KILLED	1	1	0	1	1	4
INJURED	11	1	3	8	6	29
PROPERTY DAMAGE	$82,000	$90,200	$10,750	$100,000	$25,600	$308,550
RECOVERED EXPLOSIVES INCIDENTS	24	19	24	14	13	94
POUNDS OF EXPLOSIVES	336	232	55	32	7	662
NUMBER OF DETONATORS	15	14	40	30	4	103
GRENADES	9	0	17	2	7	35
INCIDENTS INVOLVING MILITARY EXPLOSIVES AND/OR COMPONENTS						
BOMBINGS	58	54	54	64	98	328
KILLED	7	2	1	0	1	11
INJURED	30	39	25	8	20	122
PROPERTY DAMAGE	$56,850	$162,300	$58,300	$18,722	$22,800	$318,972
RADIO REMOTE CONTROLLED EXPLOSIVES INCIDENTS	15	28	29	31	22	125
NUMBER OF BOMBING INCIDENTS WHERE HOME COMPUTER BULLETIN BOARDS WERE USED TO OBTAIN INSTRUCTIONS ON MAKING BOMBS	1	2	1	4	3	11
MAILED BOMBING INCIDENTS						
BOMBINGS	12	10	20	15	13	70
KILLED	0	2	2	0	1	5
INJURED	4	1	17	8	4	34
PROPERTY DAMAGE	$3,030	$5,000	$10,000	$11,500	$150,250	$179,780

EXHIBIT D

EXHIBIT E

ALL REMOTE CONTROL BOMBINGS
JAN. 1, 1979 TO DEC. 31, 1991

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS

MONTHLY EXPLOSIVE INCIDENTS REPORT
PERIOD: JAN 01,79 TO DEC 31,91

SUMMARY OF EXPLOSIVE INCIDENT TYPES:

ACCIDENT NON CRIMINAL.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
ACCIDENT CRIMINAL.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	6, TOTAL YEAR TO DATE:	6	PERCENT:	.04
BOMBING.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	88, TOTAL YEAR TO DATE:	88	PERCENT:	.60
INCENDIARY.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
ARSON.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
CAUSE AND ORIGIN.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
NON-DETONATION.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	53, TOTAL YEAR TO DATE:	53	PERCENT:	.36
NON-INCENDIARY.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
STOLEN.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
RECOVERY.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
THREAT.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
HOAX.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
SEIZURE.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
TOTAL OF ALL INCIDENTS:	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	147, TOTAL YEAR TO DATE:	147	PERCENT:	1.00

SUMMARY OF JURISDICTIONS

A.T.F.	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	91, TOTAL YEAR TO DATE:	91	PERCENT:	.62
A.T.F.	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	23, TOTAL YEAR TO DATE:	23	PERCENT:	.16
F.B.I.	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
LOCAL P.D.	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	33, TOTAL YEAR TO DATE:	33	PERCENT:	.22
BUR. MINES.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
POSTAL.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
ALL OTHER.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	0, TOTAL YEAR TO DATE:	0	PERCENT:	.00
TOTAL JURISDICTIONS:	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	147, TOTAL YEAR TO DATE:	147	PERCENT:	1.00

SUMMARY OF INJURIES

KILLED.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	14, TOTAL YEAR TO DATE:	14	PERCENT:	.10
INJURED.....	IN CURRENT PERIOD:	0,	PREVIOUS PERIODS:	47, TOTAL YEAR TO DATE:	47	PERCENT:	.32

SUMMARY OF $ DAMAGE: IN CURRENT PERIOD: 0 PREVIOUS PERIODS: 2,287,125 TOTAL YEAR TO DATE: 2,287,125

QUERY = JAN. 1, 1979 TO DEC. 31, 1991 (DATE)
BOMBINGS AND ATTEMPTED BOMBINGS (INCIDENTS)
REMOTE CONTROL (TYPE OF DEVICE)