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October 17, 1993

Hon. Paul V. Kelly  
Assistant United States Attorney  
1107 J.W. McCormack Post Office &  
Court House  
Boston, MA 02109

Dear Paul:

On October 14th, I received the first batch of the Jencks Act material from you. Included in that material was a 7 page statement taken on January 13, 1993, from David Lindholm.

Yesterday, I learned Mr. Lindholm was convicted in a 12 day trial (case no.: 90-10080-WD, before Judge Woodlock, Jack Cinghegrana, prosecutor; Richard Egbert, defense counsel; Pam Owens, Court reporter) in November and December, 1990.

At the trial, the prosecutor introduced into evidence substantial portions of Mr. Lindholm's testimony in his divorce case to prove he lied. The prosecutor also introduced a number of exhibits (tax returns, bank applications, etc.) for the same purpose.

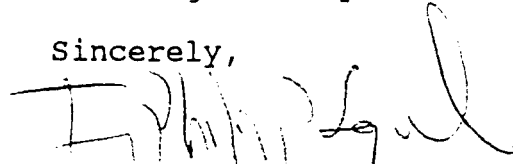
Under Brady and the Jencks Act, I am entitled to this material. Please consider this letter a formal demand for the transcripts and exhibits in the Lindholm case.

Since I plan to investigate adequately the issues raised by Mr. Lindholm's 1990 testimony and trial exhibits, I plan to file a motion requesting that Mr. Lindholm not be allowed to testify until I have had such time, or the case be continued.

I would appreciate it if you would check whether IRS Special Agent Capece has written anything about Mr. Lindholm's contact with Trenkler and/or Shay, Jr.

Even if Mr. Lindholm does not have a specific cooperation agreement relating to this case, if he is cooperating, or has cooperated, on other matters, I believe I am entitled to disclosure of any arrangement he entered into relating to cooperation.

Sincerely,



Terry Philip Segal

TPS/jpw