



*United States Attorney*  
[REDACTED]

FAX / [REDACTED]

May 21, 199 [REDACTED]

Via FAX [REDACTED]

[REDACTED]

Re: United States v. [REDACTED]  
(No. [REDACTED])

Dear [REDACTED]

I have received your May 20th letter.

I do not recall, and my notes do not reflect, the request you claim to have been made at the last video viewing. Rather, it was my understanding (and my notes reflect) that [REDACTED] at first wanted either moving images or "stills" of the female from videotape marked exhibit 17C (its' label reads [REDACTED] but he also had expressed that he would want "stills" of nonsexual scenes from tapes that he was going to indicate. When the viewing session was concluding, he and [REDACTED] conferred and [REDACTED] began to verbally request stills but was unable to clearly convey his request in the time available (he was aware I had to leave for a 4:00 p.m. appointment), so he agreed that your office would let me know in a letter precisely what was being requested. As to whether providing stills would be a problem, I believe I made it clear that whether it was a problem would depend on the availability of [REDACTED] and [REDACTED] agency's equipment (neither I nor my office has the capability to provide stills from videotape).

The tape your letter refers to ("Flashing [REDACTED] is videotape exhibit 17B and it was not reviewed by [REDACTED] and your client at the last video viewing.

I am not available May [REDACTED] [REDACTED] is available on the date and time you chose, but you will need to confirm promptly that [REDACTED] (rather than me) making the materials available is satisfactory. Again, the viewing would be at these offices, not [REDACTED] [REDACTED] would not have full authority to make decisions in my absence regarding disclosure, copying and the like.

[REDACTED]

[REDACTED]

May 21, 199 [REDACTED]

Page - 2 -

The already-prepared redacted copies of still photographs, as I explained in my earlier correspondence to you, are available for you to sign for and personally receive at my office. As I also explained, all other still photographs to be offered are and have been available for your inspection, but I will not make copies of child pornography for you pursuant to a blanket request and both Judge [REDACTED] and case law support my position.

Your letter's request for video footage from [REDACTED] of "the first four girls on that tape," excluding scenes of sexually explicit conduct, requires clarification or, perhaps, correction. The first four females shown on that tape are basically in sexually explicit scenes when they're shown and my review of the tape makes me wonder if you mean to refer to a different videotape (on the tape you identify, female 1 parades and poses and masturbates in a room having a refrigerator by a dresser; female 2, a blonde in boots, uses a dildo while outside what appears to be a house and on a park bench<sup>1</sup>; female 3, a different blonde wearing an open black blouse, is shown outdoors by patio doors, a hammock and a plant; and female 4, a dark haired possibly-Oriental female, is shown by a parked blue car; both of the latter females are also involved in graphic sexual displays).

Please let me know, as soon as possible, your position on these matters.

Very truly yours,

[REDACTED]  
United States Attorney

[REDACTED]  
Assistant United States Attorney

[REDACTED]

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<sup>1</sup> This female or a different one who looks like female 2 then is shown on a canopy bed in graphic sexual activity.

RIF