



U.S. Department of Justice

FILE COPY

United States Attorney
[REDACTED]

[REDACTED]

FAX/ [REDACTED]

May 29, 199 [REDACTED]

VIA FAX [REDACTED]

[REDACTED]

Re: United States v. [REDACTED]

Dear [REDACTED]

Having returned to the office today, I spoke to [REDACTED]. Based on that conversation, I understand the following requests to have been made on your client's behalf at the evidence-viewing session held on the afternoon of May [REDACTED].

(a) Regarding the videotape labeled Government's Exhibit 17B, you¹ want a copy of the entire footage showing the first-depicted female in the video and portions depicting the next three females' faces and unclothed/partly-clothed bodies where those three are not engaged in sexually explicit conduct.

(b) [REDACTED]

As to request (a), I refer to you Magistrate [REDACTED] [REDACTED] "Order and Report and Recommendation," at pp. 17-18, subsequently adopted by District Judge [REDACTED]. The videotape (G. Ex. 17B), like all the seized items and trial exhibits, remains

¹ I understand that [REDACTED] made these requests acting on your and your client's behalf, in that you did not personally attend the May [REDACTED] evidence-viewing session.

[REDACTED]

May 29, 199 [REDACTED]
Page 2

available for viewing at any reasonable time and place; however, copies will not be provided by the Government.²

[REDACTED]

I trust that this answers your requests. Please contact me (or, I suppose, Magistrate [REDACTED] who has overseen discovery issues in this case) if you have any further requests.

Very truly yours,

[REDACTED]
United States Attorney
[REDACTED]

Assistant United States Attorney

[REDACTED]

cc: Magistrate [REDACTED]

² In any event, very little, if any, of the footage you seek can be termed something other than "sexually explicit conduct" (See, in particular, 18 U.S.C. § 2256(2)(E)). No reason has been tendered establishing why copying is now necessary (as opposed to viewing the available materials, as you, your client or your staff has done on at least four prior occasions) nor has any purpose been explained for the copies.

[REDACTED]