

DATE: December 2, 1986

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

UNITED STATES OF AMERICA           §  
  §  
VS.                                   §           CRIMINAL NO. A-86-CR-94  
  §  
VIC FEAZELL                       §

DEFENDANT'S REQUEST FOR DISCLOSURE OF  
OFFERS OF IMMUNITY OR OTHER DEALS MADE  
BETWEEN THE GOVERNMENT AND POTENTIAL  
WITNESSES FOR THE GOVERNMENT

TO: JAN PATTERSON, Assistant U.S. Attorney for the Western District  
of Texas, Austin Division.

Pursuant to Rule 16, F.R.C.P., District Attorney VIC FEAZELL respectfully requests the right to be informed of, furnished with, inspect, copy or photograph the following which are either in the government's possession, custody, or control, the existence of which is known to you or by the exercise of due diligence may become known to you:

I.

Any written or oral plea bargain, any grant of or offer of immunity (whether written or oral), or any agreement not to prosecute a case (whether charged or not) between any agent of the Waco Police Department, the Texas Department of Public Safety, the Internal Revenue Service, the Texas Rangers, the F.B.I. or any other agent or attorney, of any nature, acting for any local, state or federal governmental agency and any person who you believe or have reason to believe may testify as a witness for the government against VIC FEAZELL.

II.

VIC FEAZELL requests the name of said witness or witnesses, if any exist, and the details of any grant or offer of immunity, or plea bargain, or payment, or other benefit or deal conferred or offered to be conferred upon any potential witness for the government.

III.

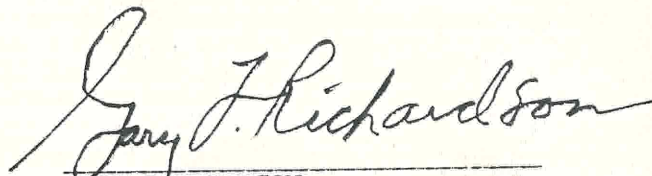
The defendant, DISTRICT ATTORNEY VIC FEAZELL, also requests the criminal records, psychiatric and psychological treatment records, medication records, drug and alcohol withdrawal treatment records, and medical/psychiatric records, including electric shock treatment records concerning any such witnesses.

IV.

NOTICE: This Request for Disclosure is not intended to waive in any way defendant's rights under his motions presently pending before the U.S. District Court and before the United States Fifth Circuit Court of Appeals concerning the Attorney Client Privilege/Work Product Materials illegally seized by the government, including, but not limited to, reports, memoranda and internal defense documents made by the defendant at the direction of his attorneys or by his attorneys or agents made in connection with the investigation or defense of this case or of statements made by the defendant, or by government or defense witnesses or prospective government or defense witnesses to the defendant, VIC FEAZELL, or his attorneys or agents under the 6th Amendment to the United States Constitution and F.R.C.P. 16(b)(2).

v.

MR. FEAZELL further requests that you, the said JAN PATTERSON, advise his undersigned counsel by letter within ten (10) days hereafter as to whether you will refuse to comply with the above request or any part thereof in order that there will be ample time prior to the trial herein to present any such refusal to the Court.



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CERTIFIED MAIL NO. P 223 352 610

cc: District Clerk for the Western District of Texas, Austin Division  
Honorable Judge James R. Nowlin