

DATE December 4, 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  
PAPER MATTER, TANGIBLE OBJECTS, STATEMENTS OF  
THE DEFENDANT AND REPORTS

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 diligence may become known to you:

I.

Any written or recorded statements made by this defendant, VIC FEAZELL, or copies thereof.

II.

The substance of any oral statement which the government intends to offer in evidence at the trial herein made by VIC FEAZELL, whether before or after arrest, in response to interrogation by any person there known by VIC FEAZELL to be a government agent.

II.

All books, papers, documents, photographs, recordings, tangible objects, or copies or portions thereof, which are in the possession, custody or control of the government, and which are material to the preparation of VIC FEAZELL's defense or are intended for use by the government as evidence in chief at the trial herein, or were obtained from or belong to VIC FEAZELL.

IV.

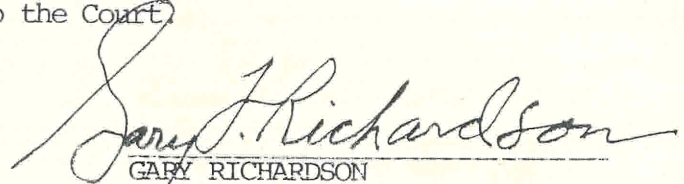
Any results or reports of any physical or mental examinations, scientific tests or experiments, or copies thereof, which are material to the preparation of VIC FEAZELL's defense, or which are exculpatory or mitigating, or are intended for use by the government as evidence in chief at the trial herein or which were obtained from or belong to this defendant.

V.

NOTICE This Request for Disclosure is not intended to waive in any way defendant's rights under his motions presently pending before the United States District Court and the United States Fifth Circuit Court of Appeals concerning the Attorney Client Privilege/Work Product Materials which were 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 to his attorneys or agents, or statements made 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).

VI

MR. FEAZELL further requests that you, the said JAN PATTERSON, advise the undersigned counsel for VIC FEAZELL, 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 223 352 612

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