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April 22, 2013

VIA ECF SYSTEM AND FIRST CLASS MAIL

Brian T. Kelly
Fred M. Wyshak, Jr.
Zachary Hafer
United States Attorney's Office
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston, MA 02210

RE: United States v. James Bulger
Docket No. 99-10371-DJC

Dear Brian, Fred and Zach,

We write to request discovery. Please see the requests enumerated below. If the discovery has already been produced, please provide the relevant Bates numbers responsive to the specific request. We request the following:

1. We request that you identify any and all expert witnesses you intend to call at trial and produce written summaries of their expected testimony pursuant to Rule 16 of the Federal Rules of Criminal Procedure. As you know, Rule 16 requires the written summary for each witness to include the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

2. Below, find a list of the individuals you have identified as potential witnesses. We request the current

addresses of all these witnesses and notification if we have missed anyone previously identified by your office.

- | | | | |
|-----|------------------|-----|--------------------------------------|
| 1. | Robert Anderson | 29. | David Lindholm |
| 2. | ██████████ | 30. | Bob Long |
| 3. | Elaine Barrett | 31. | James Marra |
| 4. | Richard Buccheri | 32. | John Martorano |
| 5. | Frank Capizzi | 33. | ██████████ ██████████ |
| 6. | John Cherry | 34. | Gerald Montanari |
| 7. | Michael Coleman | 35. | Paul Moore (DECEASED
Dec. 2009?) |
| 8. | Stephen Davis | 36. | John Morris |
| 9. | Donald DeFago | 37. | John Murray |
| 10. | Robert Dicenso | 38. | Richard O'Brien |
| 11. | Ralph DiMasi | 39. | Tara O'Brien |
| 12. | Patricia Donahue | 40. | Kevin O'Neil |
| 13. | Robin Fabry | 41. | Julie Rakes |
| 14. | Stephen Flemmi | 42. | Stephen Rakes |
| 15. | Thomas Foley | 43. | Charles Raso |
| 16. | Robert Gallinaro | 44. | Claire Robichaud |
| 17. | Barry Halloran | 45. | Thomas Ryan (DECEASED
Oct. 2012?) |
| 18. | Mike Hannigan | 46. | ██████████ ██████████ |
| 19. | William Haufler | 47. | Michael Solimando |
| 20. | Kevin Hayes | 48. | Barbara Sousa |
| 21. | Michael Holleran | 49. | William St. Croix |
| 22. | Marion Hussey | 50. | Dianne Sussman |
| 23. | John Jennings | 51. | Joseph Tower |
| 24. | Arnold Katz | 52. | Kevin Weeks |
| 25. | James Katz | 53. | Barry Wong |
| 26. | Margaret King | | |
| 27. | Sandra Lemanski | | |
| 28. | Howard Levenson | | |

If any of the witnesses above are not expected to testify, including Paul Moore and/or Thomas Ryan (our research indicates that they may have passed), please let us know.

3. In addition to the witnesses you have identified, we request the current addresses of the following individuals, whom we expect to call during our case-in-chief. Many of these witnesses previously worked for the federal government or in law enforcement and others were contacted during the investigation of this case by federal agents. Therefore, we feel you are in a good position to provide their addresses, either work or home.

- | | | | |
|----|----------------|----|-----------------|
| 1. | Gary Crossen | 4. | James Greenleaf |
| 2. | Thomas Daly | 5. | Mike Huff |
| 3. | Raymond Eganey | 6. | John Keeney |

- | | | | |
|-----|-----------------|-----|------------------|
| 7. | Richard Keifer | 15. | Edward Quinn |
| 8. | Weldon Kennedy | 16. | Richard Ramsey |
| 9. | David Margolis | 17. | James Ring |
| 10. | James Martorano | 18. | Bob Ryan |
| 11. | Sean McWeeney | 19. | Lawrence Sarhatt |
| 12. | Stanley Moody | 20. | Rosalin Wendall |
| 13. | Patrick Nee | 21. | Joseph Yerardi |
| 14. | Larry Potts | | |

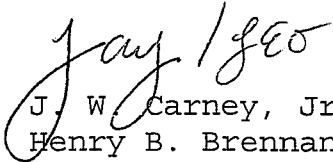
4. A confidential source in March 2000 disclosed that Kevin Weeks and James Martorano sent messages to various people that, although they were cooperating with the government, Weeks and Martorano would not harm them. Weeks sent this message to Jack Curran, Pat Nee, Pat Linskey and Michael Linskey. Martorano sent the message to Pat Nee and Richard Buccheri. See Bates # 00081888. Please identify and/or produce the following:

- a. The identity of the source referenced in the FBI 302 report dated March 29, 2000.
- b. Any other F.B.I. reports produced by Special Agents Elaine Shall and/or John Bevington relating to this source;
- c. Any notes of Special Agents Shall and/or Bevington pertaining to conversations with this source;
- d. Any documents or reports relating to a follow-up investigation of the source's information conducted by any employee of the Dept. of Justice;
- e. Any documents memorializing whether anyone from the Dept. of Justice asked Kevin Weeks about the source's allegations and any documents memorializing his response;
- f. Any documents memorializing whether anyone from the Dept. of Justice asked John Martorano about the source's allegations and any documents memorializing his response;
- g. The identity of the girlfriend of Kevin Weeks referenced in the report; and,
- h. An unredacted copy of the 302 report.

5. During his October 12, 2004 deposition in the Rakes/Dammers civil matter, Flemmi stated that he received a letter from Jack Cherry, in which Cherry states that Flemmi (and potentially Bulger) did not extort him or Paul Moore. See 00323643-45. We request the production of this letter from Cherry to Flemmi.

If you have questions, do not hesitate to contact us. Thank you for your attention to the matter.

Yours sincerely,


J. W. Carney, Jr.
Henry B. Brennan

JWC/jeo

cc: Clerk's Office

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.



J. W. Carney, Jr.