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COMMONWEALTH OF MASSACHUSETTS

BRISTOL, SS.

SUPERIOR COURT DEPARTMENT
INDICTMENT NO.: BRCR2013-01141

COMMONWEALTH

V.

DEC 3 2013

SHAYANNA JENKINS

BILL OF PARTICULARS

Now comes the Commonwealth in the above-captioned matter and respectfully provides this Bill of Particulars.

1). Time and Place - The Commonwealth states that the defendant committed perjury before the Bristol County Grand Jury sitting in Fall River. This testimony was given on August 13 and August 15, 2013.

2). Manner/Means - The Commonwealth further states that the defendant committed perjury when she falsely testified in substance and effect:

A). That she didn't know what caused a change of her plans to go to New Hampshire on the weekend of June 15-16;

B). That she didn't have a conversation with Aaron Hernandez about why he needed to meet with his lawyers and therefore could not go to New Hampshire;

C). That she didn't know that it was the lawsuit that caused the change in New Hampshire plans;

D). That she didn't speak with Aaron Hernandez about the shooting of Alexander Bradley and that she did not remember what Aaron Hernandez told her about why he was being sued;

E). That she did not have any conversation with Aaron Hernandez about why the police had come to their home or why he went to the police station;

F). That she did not have any conversation about Odin Lloyd's murder and ensuing investigation, despite knowing that that his body was found near their home and that Aaron Hernandez had been with Odin Lloyd on the night of his murder;

G). That she was providing the password to her iphone;

H). That she did not understand the text message that she received from Aaron Hernandez while he was at the police station;

I). Concerning Aaron Hernandez' possession of guns;

J). That she saw only one gun in her home;

K). Concerning any conversation with Aaron Hernandez about seeing a gun in the house;

L). That she has no idea of the time frame of when she saw the gun in a drawer;

M). Concerning her claimed lack of memory about multiple conversations with Aaron Hernandez;

N). Concerning conversations she had with Aaron Hernandez when he called her on June 18, 2013 from his attorney's office, Ropes and Gray instructing her to remove items from the home;

O). Concerning her lack of knowledge of the items that she was removing from the home;

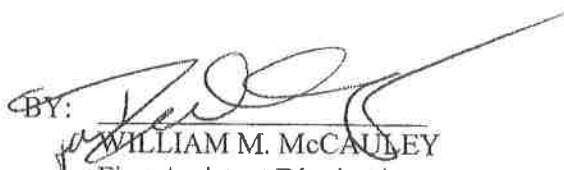
P). Concerning how, why and the manner in which she removed the items from the home;

- Q). That she did not speak with others about removing these items from the home;
- R). Concerning where she went upon leaving the home with the items;
- S). Concerning when, where, and how she disposed of the items she removed from the house at Aaron Hernandez's direction;
- T). That getting rid of the box was not important or a concern of hers;
- U). That she didn't attempt to hide the box when removing it from the home;
- V). That she had not told anyone about disposing of the box because it was not important to her and not because she sought to conceal her actions;
- W). That she did not know what happened to a white sweatshirt belonging to Aaron Hernandez;
- X). That it was not uncommon for her to use her sister's car;
- Y). That she didn't know Bo's name before the murder of Odin Lloyd;
- Z). That she hasn't spoken to Bo (Ernest Wallace) since the homicide of Odin Lloyd;
- AA). That she didn't know Bo's name; and
- BB). Concerning a confidentiality agreement and immigration issues related to house cleaners; and
- CC). Concerning where she went after she left Aaron Hernandez at the North Attleboro Police Station on June 17, 2013.

The Commonwealth reserves the right to amend or supplement this Bill of Particulars.

RESPECTFULLY SUBMITTED

C. SAMUEL SUTTER
DISTRICT ATTORNEY


BY: 

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Dated: December 2, 2013

CERTIFICATE OF SERVICE

I, William M. McCauley, hereby certify that on November 2, 2013, I caused to be served on Defendant's Counsel, Janice Bassil, 20 Park Plaza, Suite 140, Boston, MA 02116 a true copy of the Commonwealth's Bill of Particulars by First Class Mail and Facsimile, (617) 338-5587.


WILLIAM M. McCAULEY