We do not believe anything being produced is Brady material bearing on the federal convictions or sentences of Timothy McVeigh or Terry Nichols. Similarly, we do not believe anything in the materials makes even a prima facie showing of either man's actual innocence. Many of the materials are similar to the previously-litigated "lead sheets," in that they involve interviews and information regarding persons whom at one time were thought to resemble the UNSUB sketches. Nonetheless, many of the materials – in particular, the FBI-302s and inserts – should have been produced under the reciprocal discovery agreement. We are producing the materials now so you can make your own determinations.

Please feel free to contact me if you have any questions.

Sincerely,

SEAN CONNELLY
Special Attorney to the
U. S. Attorney General

Attached FBI Materials: Albany 1-153; Albuquerque 1-102; Anchorage 1-7; Atlanta 1-61; Birmingham 1-30; Boston 1-70; Buffalo 1-179; Charlotte 1-5; Chicago 1-90; Cincinnati 1-3; Cleveland 1-10; Dallas 1-63; Detroit 1-164; El Paso 1-152; Honolulu 1-30; Houston 1-37; Indianapolis 1-61; Jackson 1-36; Kansas City 1-12; Knoxville 1-4; Little Rock 1-98; Los Angeles 1-446; Louisville 1-5; Miami 1-226; Milwaukee 1-3; Minneapolis 1-10; Mobile 1-179; New Orleans 1-103; Norfolk 1-4; New Haven 1-51; Omaha 1-9; Paris 1-26; Philadelphia 1-36; Phoenix 1-4; Pittsburgh 1-7; Portland 1-5; Richmond 1-39; Sacramento 1-105; St. Louis 1-48; Salt Lake City 1-218; San Antonio 1-93; San Diego 1-59; San Francisco 1-5; Seattle 1-38; Tampa 1-46; Washington 1-3.

pc (w/o Attachments) (by 5/10 hand delivery): The Honorable Richard P. Matsch.