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**FILED**  
DISTRICT COURT OF GUAM

MAR 11 2008 *cks*

Attorney for Defendant

**JEANNE G. QUINATA**  
Clerk of Court

DISTRICT COURT OF GUAM

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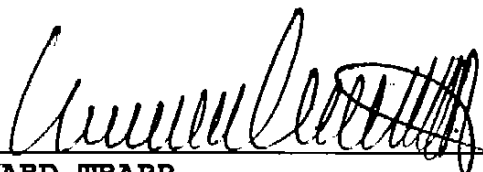
UNITED STATES OF AMERICA,	(	Criminal Case No. 08-00016
	)	
Plaintiff,	(	REQUEST FOR PRODUCTION
	)	OF EXCULPATORY AND
vs.	(	IMPEACHMENT EVIDENCE
	)	( <u>BRADY V. MARYLAND</u> , 373
JI EON LEE,	(	U.S. 83 (1963).)
	)	
Defendant.	(	

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Defendant requests that the government produce all evidence favorable to Defendant and material either to guilt or to punishment including, but not limited to, all information about its witnesses that could cast doubt upon their credibility, and in connection with the latter, that the government undertake, in accordance with the policy set forth in United States v. Jennings, 960 F.2d 1488, 1492 n.3 (9th Cir. 1992), an examination of the personnel files of its law enforcement officer witnesses for such material.

Dated, Hagåtña, Guam,

March 11, 2008.



HOWARD TRAPP  
HOWARD TRAPP INCORPORATED  
Attorney for Defendant

(REQUESTS/PRODUCTION2.JELee)

**ORIGINAL**

DECLARATION OF SERVICE

I, Reina Y. Urbien, declare that I am an administrative assistant employed in the office of Howard Trapp Incorporated, Howard Trapp, Esq., the attorney for Defendant herein, and that on March 11, 2008, I served the document to which this declaration is annexed on Rosetta L. San Nicolas, Esq., Assistant United States Attorney, the attorney for Plaintiff herein, by leaving a copy thereof at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, her last known address, with a person in charge thereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 11, 2008, at Hagåtña, Guam.

  
REINA Y. URBIEN