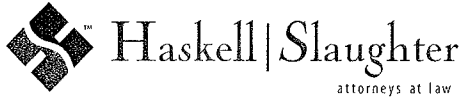


# **EXHIBIT A**



G. Douglas Jones  
Direct Dial: 205.834.9829  
gdj@hsy.com

Haskell Slaughter Young & Rediker, LLC  
1400 Park Place Tower  
2001 Park Place North  
Birmingham, Alabama 35203  
t. 205.251.1000 | f. 205.324.1133

November 22, 2010

*VIA E-MAIL*

Mr. Peter Ainsworth  
Public Integrity Section  
U.S. Department of Justice  
Washington, D.C. 20005

**Re: *United States v. McGregor, et al.***  
**Case No. 2:10cr186-MHT**

Dear Mr. Ainsworth:

Pursuant to the Court's standing order on discovery and Rule 16 of the Federal Rules of Criminal Procedure, defendant Ronnie Gilley, hereby requests that the United States provide the following documents:

A. Documents related to each Title III Wiretaps

1. Linesheet Minimization Detail Reports- These reports should contain all call session details including participants, documents, total lines minimized and duration minimized.
2. Electronic Surveillance Log Reports- These reports should be sorted by case/target/line and lists all sessions for each line with session details, participants and documents. It is my understanding that the report provides a header on each page which automatically fills in the monitor ID and provides signature and date lines for the monitor and supervisor.
3. Document Summary Reports- These reports provides a detailed view of each session with its documents and document session listing activity for the sessionThe report is sorted by case, target and line.
4. Case Statistical Breakdown Reports- These reports provide statistical data throughout the case, including the total number of sessions and totals for the number of incoming/outgoing calls, pertinent sessions, non-pertinent sessions, privileged sessions, minimized sessions, completed sessions and SMS (text message) sessions for each line.

Mr. Peter Ainsworth  
November 22, 2010  
Page 2 of 3

5. Statistical Summary Reports- These reports provide a statistical breakdown of sessions by case/target/line. The reports calculate among other things, the total number of intercepted sessions, as well as the completed number of sessions, as well as the completed number of sessions, SMS (text) calls, malfunction calls, total of minimized calls out of completed calls.
6. Session History Reports- These reports give a detailed list of all of the events in session history in chronological order.
7. User Line Assignments Reports-These reports are also sorted by case/target/line and lists all users who have, or had, permissions to the line, including a list of all users who had access to the case and the data and times of the login to the system.
8. Printout on electronic media of all pen register data generated on non-VoiceBox systems, including geographical information associated with cellular telephone communications.
9. Printout on electronic media (or paper if electronic media was not provided to the FBI) of all telephone or other carrier toll records, subscriber information, SMS messaging, and geographic location information.
10. Full identities, agencies, and positions of all Title III monitors associated with this case, and copies of Title III certification documents for non-Agent personnel
11. Copies of minimization procedure materials presented to monitors, whether written, video, or audio, along with logs or other signed and dated acknowledgements of attendance or review of the minimization procedures by each monitor.

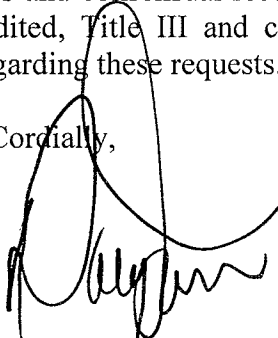
B. Documents Related to Consensual Recordings

1. Copies of all authorizations for consensual monitoring utilized in this case. This should include FBI authorizations as well as signed consent forms.
2. Copies of all FD-302's reflecting consensual recordings conducted in this case, whether or not pertinent recordings were obtained.
3. Documentation regarding the specific electronic recording devices, including make, model, and serial number, used for all consensual recordings made in this case.

Mr. Peter Ainsworth  
November 22, 2010  
Page 3 of 3

The above outlined requests are both material to the defense of this case and necessary for the preparation of motions involving the wiretaps and consensual recordings. The requests assume that you have already provided all, non-edited, Title III and consensual recordings. Please let me know of a time to "meet and confer" regarding these requests.

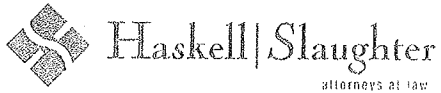
Cordially,



A handwritten signature in black ink, appearing to read 'G. Douglas Jones', is written over the word 'Cordially,'. The signature is stylized and cursive.

G. Douglas Jones

cc: All Lead Counsel of Record



G. Douglas Jones  
Direct Dial: 205.834.9829  
gj@hsy.com

Haskell Slaughter Young & Rediker, LLC  
1400 Park Place Tower  
2001 Park Place North  
Birmingham, Alabama 35203  
t. 205.251.1000 | f. 205.324.1133

December 16, 2010

*VIA E-MAIL*

Mr. Peter Ainsworth  
Public Integrity Section  
U.S. Department of Justice  
Washington, D.C. 20005

**Re: *United States v. McGregor, et al.***  
**Case No. 2:10cr186-MHT**

Dear Mr. Ainsworth:

As follow-up to the hearing on Tuesday and the Court's order requiring the United States to complete "uncontested" discovery by Monday, December 20, 2010, and after consulting with counsel for the other defendants, please be advised that it is our opinion that documents falling within the descriptions outlined below are discoverable under Rule 16 of the Federal Rules of Criminal Procedure, the Standing Order on Criminal Discovery and the procedure of previous productions from the United States in this case, and thus should be deemed uncontested:

1. All of the wiretap and consensual recording reports referenced in my correspondence of November 22, 2010. Some of this material has been provided, but most has not.
2. Additional FBI 302s. There are 3 categories here that we believe should be available to be produced:
  - a. All 302s generated under FBI case numbers that end in 46187 and 44533. You have previously produced 302s that we reference one or the other of these numbers and in some cases both of these numbers. You have referred to the investigations as a so-called "executive" or "Troy King" investigation and a "legislative" investigation, but it is impossible to tell which is which from the 302s you have produced. It is obvious that the agents used both numbers interchangeably and sometimes jointly. For a more complete detail of what I am talking about see the attachment to our reply concerning the recusal documents. We do not believe that when the agents work more than one case and fail to distinguish or separate the cases in their investigative reports, prosecutors can pick and choose what reports to provide to the defense.

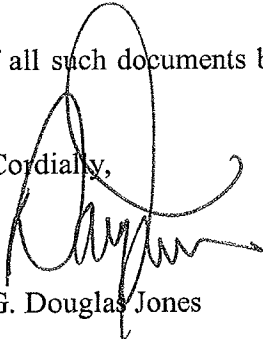
Mr. Peter Ainsworth  
December 16, 2010  
Page 2

- b. Interviews which took place and a 302 should have been generated but have not been furnished. For instance, in the spring of 2009 agents visited my client, who was clearly a subject of the so-called "executive" investigation, at his office in Enterprise for the purpose of interviewing him. We have not seen any report of that visit. In addition, agents visited Jarrod Massey in March/April of this year and there is no record of that visit. There was a report in the Birmingham News this past Sunday that a Birmingham FBI agent had interviewed Larry Langford to enlist his cooperation against Mr. McGregor, and we have been informed that just a month or so ago agents interviewed individuals from Nashville who were at the dinner with Sen. Beason and Rep. Lewis that is referenced in the indictment. We have received nothing concerning these interviews.
  - c. 302s where consensual tape recordings are turned over. These have been previously requested in my November 22<sup>nd</sup> correspondence.
3. Grand Jury material – For the same reasons we requested all 302s in 2a above, we would request that we be furnished with transcripts of all grand jury witnesses associated with the FBI case numbers ending in 46187 and 44533.
4. Any recorded statement of any witness. Please confirm if there are any recorded statements of any witness interviews. State agents often record witness statements and we are unsure whether or not that practice was followed by any of the state agents working on this case. If so, please furnish the tape and transcript of all such recorded statements.
5. Brady Material - We believe the Nashville interviews will include both Brady and Giglio material favorable to Mr. Gilley. In addition, based on the efforts to tie Mr. McGregor to the Larry Langford matter in the Northern District of Alabama we believe that there is likely some Brady material generated in that investigation. In addition, please furnish copies of any and all drafts of plea agreements and factual statements that were circulated between the government and any defendant or cooperating witness.
6. Giglio material – Please provide copies of any material from any state or federal agent's personnel file that reflects on their honesty, integrity or other character trait. In addition, please provide the substance of any written or oral threats, offers of assistance, offers to refrain from prosecuting or other offers of leniency made to any witness before or after any interview or grand jury testimony.
7. Evidence turned over to agents that is referenced in any 302 but not provided. These include a number of tape recordings made by the Sheriff of Houston County, Andy Hughes. According to the 302s (on at least 3 occasions) he turned over tape recordings he made on his own.

Mr. Peter Ainsworth  
December 16, 2010  
Page 3

We hereby request that production of all such documents be part of your December 20, 2010, production.

Cordially,



G. Douglas Jones

GDJ/rws/4053583\_1.DOC

cc: All counsel of record

**Butler, Thomas J.**

---

**From:** Jones, G. Douglas  
**Sent:** Monday, December 20, 2010 3:32 PM  
**To:** 'Peter Ainsworth (peter.ainsworth@usdoj.gov)'  
**Cc:** 'Barak Cohen'; 'Ben Espy'; 'Bill Baxley'; 'Brenda Morris'; 'Brett Bloomston'; Butler, Thomas J.; 'Denise Simmons'; 'Eric Olshan'; 'Fred Gray'; 'Jackson Sharman'; 'Jeffrey Duffey'; 'Jim Parkman'; 'Joe Espy'; 'Joel Dillard'; 'John Englehart'; 'Joseph Basgier'; 'Joshua McKeown'; 'Latasha Nickle'; 'Lewis gillis'; 'Louis Franklin'; 'Peter Ainsworth'; 'Rae Woods'; 'Richard Adams'; 'Robert Segall'; 'Ron Wise'; 'Sam Heldman'; 'Samuel Franklin'; 'Shannon Holliday'; 'Stephen Feaga'; 'Stephen Shaw'; 'Stewart McKnight'; 'Susan James'; 'Thomas Goggans'; 'Tyrone Means'; 'Walter McGowan'; 'William Clark'; 'William Espy'; 'William White'  
**Subject:** U. S. vs. McGregor

Peter,

In light of the package of 302s we received today, the discovery requests contained in my previous correspondence are hereby supplemented as follows:

1. Please provide unredacted copies of Mr. Massey's 302s. We are entitled to see everything that a cooperating witness has provided to the Government, even if it is not directly related to the allegations in the indictment. His credibility will be at issue and we are entitled to test all alleged facts he has provided and to gauge that against his expected benefit.
2. I want to again request copies of all 302s. If a formal 302 as not been transcribed then provide us with the interview notes of the agents by the court ordered deadline today. I make this request because some of the 302s we received today were of interviews in late Ocober but not transcribed until December 15, the day after the December 14th hearing in which you represented to the court that all discovery had been produced. Our information is that others were also interviewed during the same October trip to Nashville, but we haven't seen them. If there are notes of interviews in the possession of any agent we request that they be forwarded today pending formal transcription.

Thanks,  
Doug Jones

---

G. Douglas Jones  
Attorney  
Haskell Slaughter Young & Rediker, LLC  
2001 Park Place, Suite 1400  
Birmingham, AL 35203  
Cell: 205.533.1974  
Direct Line: 205.834.9829  
Main Number: 205.251.1000  
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[www.hsy.com](http://www.hsy.com)



12/21/2010



LAW OFFICES OF  
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L. DREW REDDEN  
1922-2007

December 16, 2010

Mr. Peter Ainsworth  
Public Integrity Section  
U.S. Department of Justice  
Washington, D.C. 20005

Re: United States v. McGregor, et al.  
Case No. 2:10cr186-MHT

Dear Mr. Ainsworth:

As follow-up to the hearing on Tuesday and the Court's order requiring the United States to complete "uncontested" discovery by Monday, December 20, 2010, and after reviewing the responses of the Government to the requests of other Defendants, please be advised that it is our opinion that documents falling within the descriptions outlined below are discoverable under Rule 16 of the Federal Rules of Criminal Procedure, the Standing Order on Criminal Discovery and the procedure of previous productions from the United States in this case, and thus should be deemed uncontested:

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2. Additional FBI 302s. There are 3 categories here that we believe should be available to be produced:

a. All 302's generated under FBI case numbers that end in 46187 and 44533. You have previously produced 302's that reference one or the other of these numbers and in some cases both of these numbers. You have referred to the investigations as a so-called "executive" or "Troy King" investigation and a "legislative" investigation, but it is impossible to tell which is which from the 302's which have been produced. It is obvious that the agents used both numbers interchangeably and sometimes jointly. For a more complete detail of what we are talking about see the attachment to Doug Jones' reply concerning the recusal documents. We do not believe that when the agents work more than one case and fail to distinguish or separate the cases in their investigative reports, prosecutors can pick and choose what reports to provide to the defense.

b. Interviews which took place and a 302 should have been generated but have not been furnished. For instance it is our understanding Doug Jones has notified you that, in the spring of 2009 agents visited his client, who was clearly a subject of the so-called "executive" investigation, at his office in Enterprise for the purpose of interviewing him. We have not seen any report of that visit. In addition, it is our understanding, agents visited Jarrod Massey in March/April of this year and there is no record of that visit. There was a report in the Birmingham News this past Sunday that a Birmingham FBI agent had interviewed Larry Langford to enlist his cooperation against Mr. McGregor, and it is our understanding that just a month or so ago agents interviewed individuals from Nashville who were at the dinner with Sen. Beason and Rep. Lewis that is referenced in the indictment. We have received nothing concerning these interviews.

c. 302's where consensual tape recordings are turned over. These were previously requested in Doug Jones' November 22<sup>nd</sup> correspondence.

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5. Brady Material -

a. We believe the Nashville interviews will include both Brady and Giglio material favorable to Mr. Gilley and thus all defendants. In addition, based on the efforts to tie Mr. McGregor to the Larry Langford matter in the Northern District of Alabama we believe that there is likely some Brady material generated in that investigation.

b. In addition, please furnish copies of any and all correspondence, drafts of plea agreements and factual statements that were circulated between the government and any defendant or cooperating witness or where applicable, their attorney.

c. All text messages, emails or other electronic communication between any agent and any witness.

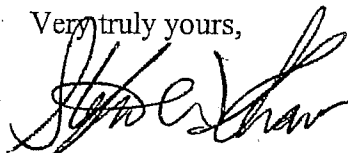
d. A detailed monthly statement for any cellular telephones of any agent reflecting time and length of all telephone calls and text messages to or from any witness.

6. Giglio material — Please provide copies of any material from any state or federal agent's personnel file that reflects on their honesty, integrity or other character trait. In addition, please provide the substance of any communication, discussion, written or oral threats, offers of assistance, offers to refrain from prosecuting or other offers of leniency made directly or indirectly, to any witness before, during or after any interview or grand jury testimony.

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We hereby request that production of all such documents be part of your December 20, 2010, production.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen W. Shaw". The signature is fluid and cursive, with the first name "Stephen" being the most prominent part.

Stephen W. Shaw

SWS/lan

cc: All counsel of record