

1 THOMAS E. MOSS  
UNITED STATES ATTORNEY  
2 GEORGE W. BREITSAMETER  
ASSISTANT UNITED STATES ATTORNEY  
3 DISTRICT OF IDAHO  
WELLS FARGO CENTER, SUITE 201  
4 877 WEST MAIN STREET  
BOISE, IDAHO 83702  
5 TELEPHONE: (208) 334-1211  
MAILING ADDRESS: P.O. BOX 32  
6 BOISE, IDAHO 83707

03/13/03  
03/13/03 10:04  
GOVERNMENT'S FIRST DISCOVERY  
CLERK IDAHO

7  
8  
9  
10  
11  
12 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO  
13

14 UNITED STATES OF AMERICA, )

15 Plaintiff, )

16 vs. )

17 MITCHELL D. McBRIDE, )  
18 KIMBERLY McBRIDE, )  
19 IRENE McBRIDE, )  
20 DICK E. BUTCHER, )

Defendants. )

Case No. 04-064-S-EJL

GOVERNMENT'S FIRST DISCOVERY

21 The United States of America and Thomas E. Moss, United States Attorney for the District of  
22 Idaho, through George W. Breitsameter, Assistant United States Attorney, respond to Defendants'  
23 Request for Discovery by providing the following to Defendants:

- 24 1. Federal Bureau of Investigation Form FD-302, interview with Mitchell Devon McBride  
25 by S/A Verna R. Kessler on 03/13/03 -- 1 pages  
26 2. Printout from M. McBride hard drive -- 6 pages

- 1 3. Cindy Rowland's notes -- 12 pages
- 2 4. State Board questions, exam 9/15/98 -- 17 pages
- 3 5. Schedule of Deposit Activity, 04/05/01 - 02/08/02 -- 6 pages
- 4 6. Schedule of Deposit Activity, 04/05/01 - 02/08/02 -- 6 pages
- 5 7. Schedule of Deposit Activity, 05/25/2000 - 09/24/2002 -- 33 pages
- 6 8. Preliminary Schedule of Deposit Activity, 06/07/2002 --15 pages
- 7 9. Preliminary Schedule of Deposit Activity, 06/07/2002 -- 5 pages
- 8 10. Schedule of Deposit Activity, 05/25/2000 - 09/23/2002 -- 18 pages
- 9 11. Perry Zeyer's account of meeting with Cindy A. Rowland -- 2 pages
- 10 12. Fax Transmission dated January 28, 2004, from Cindy A. Rowland to Verna Kessler --  
11 3 pages
- 12 13. Federal Bureau of Investigation Form FD-302, interview with Brice Stille by S/A Verna  
13 R. Kessler on 03/13/03 -- 1 page
- 14 14. Letter dated June 4, 2003, to Cindy Rowland from Irene McBride --1 page
- 15 15. Memo regarding Irene McBride dated May 28, 2003 -- 1 page
- 16 16. Federal Bureau of Investigation Form FD-302, undated report of investigation by Verna  
17 R. Kessler -- 1 page
- 18 17. Letter dated February 19, 2004, to Jack from Sheila -- 2 pages
- 19 18. Grand Jury Subpoena No. D-03-329 and attached documents received from Perry Zeyer --  
20 53 pages
- 21 19. Comprehensive Client Files printout -- 38 pages

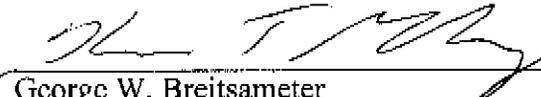
22 The United States Environmental Protection Agency's file corresponding to the Defendants is  
23 available for review at the office of the Environmental Protection Agency in Boise, Idaho.

24 The Government objects to any requests for discovery by the defendant not responded to by the  
25 Government in this document or the accompanying attachments or enclosures.  
26

1 The Government will continue to provide discovery materials as they become available.

2 DATED this 21<sup>st</sup> day of April, 2004.

3 THOMAS E. MOSS  
4 United States Attorney

5  
6 For   
7 George W. Breitsameter  
8 Assistant United States Attorney

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

CERTIFICATE OF SERVICE

I CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing Government's First Discovery was served on all parties named below this 21 day of April, 2004.

United States Mail, postage prepaid

Hand delivery

Facsimile Transmission (fax)

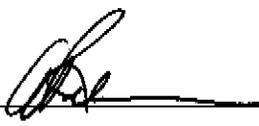
Federal Express

G. Scott Gatewood  
Sallaz & Gatewood, Chtd.  
Attorneys at Law  
Post Office Box 8956  
Boise, Idaho 83701  
Attorneys for Mitchell D. McBride

J. D. Merris  
Peterson, Reardon & Merris  
Attorneys at Law  
913 West River Street, Suite 420  
Boise, Idaho 83702  
Attorneys for Kimberly McBride

Thomas Monaghan  
Federal Defenders for Eastern Washington and Idaho  
Jefferson Place Building, Suite 301  
350 North 9th Street  
Boise, Idaho 83702  
Attorneys for Irene McBride

John C. DeFranco  
Ellsworth, Kallas & Talboy  
Attorneys at Law  
2402 West Jefferson Street  
Boise, Idaho 83702  
Attorneys for Dick E. Butcher

  
\_\_\_\_\_