

Commonwealth of Massachusetts, Plaintiffs)

vs.)

Wayne Adams, Defendant (#0770CR0558))

Terri Adams, Defendant (#0770CR0557))



The Commonwealth of Massachusetts
Office of the District Attorney
Middle District

Leonardo A. Angiulo
Assistant District Attorney

Courthouse - Main Street
Worcester, MA 01608
OFFICE OF RECORDS & PUBLIC ACCESS

Tel: 508-755-8601
Fax: 508-767-0099
E-mail: Leonardo.Angiulo@state.ma.us

Defendant's Motion for Particulars

Now comes the Defendants and move this Honorable Court, pursuant to Massachusetts Rules of Criminal Procedure, Rule 13(b), to order the Commonwealth to file a bill of particulars, informing the Defendants with respect to each count of this complaint, as follows:

1. The specific date (and approximate time) when each incident constituting the offense charged is alleged to have occurred.
2. The specific location where each incident constituting the offense charged is alleged to have occurred.
3. The specific manner in which the Defendants are alleged to have committed or otherwise participated in each incident constituting the offense charged.
4. The specific means by which the Defendants are alleged to have committed or otherwise participated in each incident constituting the offense charged.

As reason therefore, the Defendants state that the complaint itself is not sufficiently specific to inform them of the charges against them, and to permit them to prepare a defense. Failure to provide the requested information will deprive the Defendants of due process of law, in violation of Articles 11 and 12 of the Massachusetts Declaration of Rights and the Fourteenth Amendment to the United States Constitution, see Commonwealth v. Montanino, 409 Mass. 500, 512 (1991).

Respectfully submitted by the Defendants to your Honor, pro se, on this 23rd day of October, 2007.

Wayne Adams, Pro-Se Defendant
residing at 57 Fitchburg Road, Ashburnham, MA

Terri Adams, Pro-Se Defendant
residing at 57 Fitchburg Road, Ashburnham, MA

LA

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