

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
)	
vs.)	CRIMINAL NO. 02-10013-WGY
)	
RICHARD COLVIN REID,)	
a/k/a ABDUL-RAHEEM,)	
a/k/a ABDUL RAHEEM, ABU IBRAHIM)	
Defendant.)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S REQUEST
FOR RULING ON MOTION TO STRIKE SURPLUSAGE
FROM INDICTMENT**

The government hereby opposes defendant’s renewed motion to strike surplusage from the indictment. The indictment contains only allegations of facts that are relevant to essential elements of the crimes charged. The indictment contains no immaterial or irrelevant allegations that are unfairly prejudicial to the defendant. United States v. Lewis, 40 F.3d 1325, 1346 (1st Cir. 1994). The government intends to offer facts at the Rule 11 hearing, and further support those facts in its presentence submission to this Court, that support each of the allegations in each of the eight counts remaining in this case.

Respectfully submitted,

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By:

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October 2, 2002