

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**UNITED STATES OF AMERICA**

**v**

**2:19-cr-000171**

**ROBERT JAMES McCABE, et al**

**Defendant,**

**MOTION FOR BILL OF PARTICULARS**

**COMES NOW** the Defendant, pursuant to Rule 7(F) of the Federal Rules of Criminal Procedure, by Counsel, and moves the Court to require the Government to file a bill of particulars with respect to the following issues:

1. With respect to Conspirator #1, as alleged in paragraph 13 of the indictment, state the particulars of the free catering, travel, campaign contributions, entertainment, gift cards and personal gifts, as well as the date of such conveyances and the location of such conveyances.
2. With respect to conspirator # 1, as alleged in paragraph 13 of the indictment, state the official acts not stated in the indictment as having been provided by Mr. McCabe. State with specifics the dates and the details of the inside information to Company A related to RFP's.
3. With respect to codefendant Boyle, as alleged in paragraph 17, state with specificity the gifts and things of value provided to the McCabe.

4. With respect to codefendant Mr. Boyle, as alleged in paragraph 17, state with specificity the official acts Mr. McCabe allegedly performed on an “as needed” basis. State what inside information to CCS’s representatives was provided.

5. With respect to codefendant Mr. Boyle, as alleged in paragraph 41, state with specificity, the things of value including dates and locations.

6. The above referenced paragraphs are alleged and incorporated into counts one through ten of the indictment.

As grounds for the motion the defendant alleges that the indictment is so vague on such critical matters that the defendant is unable to prepare defenses against the allegations.

Respectfully submitted,

Robert James McCabe  
By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of February, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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