

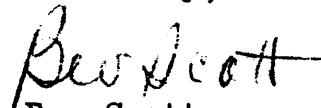
14 Charles Lane
New York, N.Y. 10014
May 1, 1974

TO ALL ORGANIZERS AND NATIONAL COMMITTEE MEMBERS

Dear Comrades,

Enclosed for your information is a copy of the "Plaintiffs' Response to Federal Defendants' Interrogatories," which was filed on April 3 in connection with the SWP and YSA Watergate suit.

Comradely,



Bev Scott
National Office

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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-----X
SOCIALIST WORKERS PARTY, et al.,          :
        Plaintiffs,                        :    73 Civ. 3160 (TPG)
-against-                                :
ATTORNEY GENERAL OF THE UNITED STATES,    : PLAINTIFFS' RESPONSE
et al.,                                : TO FEDERAL DEFENDANTS'
        Defendants.                       : INTERROGATORIES
-----X

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JOHN RATLIFF, being duly sworn, deposes and says that he is a member of the Socialist Workers Party, that he is familiar with the facts of this case and that he has been designated by the plaintiffs to answer the federal defendants' interrogatories dated February 15, 1974, as follows:

1(a): SWP's Presidential candidate received 96,176 votes in the 1972 elections. The figure of approximately 100,000 members and supporters is derived from this vote total as adjusted to include post-1948 members and supporters who did not vote for the SWP in 1972, including those who were unable to do so due to denial of ballot space in California and other states.

1(b): Plaintiffs object on the ground that the information requested is not relevant to the claim or defense of any party and does not appear reasonably calculated to lead to the discovery of relevant evidence.

1(c): Plaintiffs possess no knowledge or records from which the number can be determined, except as indicated in response to No. 1(a).

1(d): Plaintiffs object on the ground that information concerning membership lists of SWP and YSA and information concerning addresses of members and supporters of SWP and YSA is privileged by the First Amendment from disclosure. In addition plaintiffs object on the ground that this interrogatory (together with many others in this set) was propounded for the improper purpose of harassing and intimidating plaintiffs and potential witnesses in this case.

1(e): Plaintiffs object on the ground stated under 1(d).

1(f): The names and offices are listed below. As to addresses, plaintiffs object on the ground stated under No. 1(d). Plaintiffs possess no records or knowledge from which to determine the number of supporters for each of these candidates.

1968

| <u>Name</u> | <u>Office</u> | |
|---------------|---------------|-------------|
| Fred Halstead | Pres. U.S. | |
| Paul Boutelle | V.Pres. U.S. | |
| Peter Camejo | U.S. Sen. | Calif. |
| Carl Frank | U.S. Cong. | 5th Dist. " |

| | | | |
|------------------|---------------------------|------------|--------|
| Bob Himmel | U.S. Cong. | 5th Dist. | Calif. |
| Phil Passen | U.S. Cong. | 17th Dist. | " |
| John Gray | U.S. Cong. | 29th Dist. | " |
| Jim Kendrick | State Sen. | 9th Dist. | " |
| Derrel Myers | State Sen. | 11th Dist. | " |
| Dianne Feeley | State Assem. | 19th Dist. | " |
| Milton Chee | State Assem. | 20th Dist. | " |
| Sylvia Weinstein | State Assem. | 23rd Dist. | " |
| Cliff Connor | U.S. Sen. | | Ga. |
| Dan Styron | U.S. Sen. | | Ill. |
| Carl Finamore | Governor | | " |
| Lynn Henderson | U.S. Cong. | 2nd Dist. | " |
| Ralph Levitt | U.S. Sen. | | Ind. |
| John Belisle | U.S. Cong. | 2nd Dist. | Mich. |
| Frank Lovell | U.S. Cong. | 12th Dist. | " |
| Henry Austin | U.S. Cong. | 16th Dist. | " |
| James Griffin | U.S. Cong. | 17th Dist. | " |
| Sarah Lovell | U.S. Cong. | 18th Dist. | " |
| Ellen Robinson | St. Bd. of Educ. | | " |
| Evelyn Sell | St. Bd. of Educ. | | " |
| George Bouse | Mich. St. U. Tr. | | " |
| Paul Lodico | Mich. St. U. Tr. | | " |
| Helen Schiff | U. of Mich. Tr. | | " |
| Evelyn Kirsh | Wayne St. U. Bd. of Govs. | | " |
| Joseph Saunders | Wayne St. U. Bd. of Govs. | | " |
| Robert Fink | Wayne Co. Sheriff | | " |
| Edward D'Angelo | Wayne Co. Auditor | | " |
| David Thorstad | U.S. Cong. | 3rd Dist. | Minn. |
| Eric Reinthaler | U.S. Sen. | | Ohio |
| David Wulp | U.S. Cong. | 22nd Dist. | " |
| Hedda Garza | U.S. Sen. | | N.Y. |
| Judy White | U.S. Cong. | 17th Dist. | N.Y. |
| Peter Buch | U.S. Cong. | 19th Dist. | " |
| Derrick Morrison | U.S. Cong. | 20th Dist. | " |
| Richard Garza | U.S. Cong. | 22nd Dist. | " |
| Pearl Chertov | U.S. Sen. | | Pa. |
| Fred Stanton | Auditor Gen. | | " |
| Richard Lesnik | State Treas. | | " |
| Debbie Leonard | U.S. Sen. | | Wash. |
| Will Reissner | State Legis. | 32nd Dist. | " |
| Ken Shilman | State Assem. | 16th Dist. | Calif. |
| Bob Wilkinson | Governor | | Wisc. |

1969

| | | | |
|--------------------|-------------------------|--|--------|
| Paul Boutelle | Mayor, N.Y.C. | | N.Y. |
| Jeff Mackler | Pres. City Counc. | | " |
| Alfredo Pena | Comptroller | | " |
| Patricia Grogan | Councilwoman-at-large | | " |
| Derrick Morrison | Man. Boro, Pres. | | " |
| Syd Stapleton | Mayor, Cleve. | | Ohio |
| James Harris | E. Cleve. Bd. of Educ. | | " |
| Tom Leonard | Mayor, Seattle | | Wash. |
| Maureen Jasin | D.A., Phila. | | Pa. |
| Michael Walker | City Controller, Phila. | | " |
| Frederick Stanton | Judge, Traf. Ct., Phila | | " |
| Richard Feigenberg | Judge, Phila. | | " |
| William Hathaway | Mayor, L.A. | | Calif. |
| Della Rossa | Bd. of Educ., L.A. | | " |

| | | |
|----------------|----------------------------|--------|
| Antonio Camejo | City Counc., Berkeley | Calif. |
| Pat Wolf | City Counc., Berkeley | " |
| Froben Lozada | School Dir., Berkeley | " |
| Paul Lodico | Comm. Counc., Detroit | Mich. |
| Derrel Myers | School Bd., Minneapolis | Minn. |
| Lee Smith | Alderman, 13th Ward, Minn. | " |
| David Thorstad | Mayor, Minn. | " |

1970

| | | |
|-------------------|--------------------------|--------|
| Herman Fagg | Governor | Calif. |
| Dianne Feeley | U.S. Sen. | " |
| Andrew Pulley | U.S. Cong. 7th Dist. | " |
| Dave Frankel | Lt. Governor | " |
| Terry Hardy | Controller | " |
| Phil Connor | State Treas. | " |
| Patty Iiyama | Secy. of State | " |
| Froben Lozada | Atty. Gen. | " |
| Antonio Camejo | Supt. Pub. Schools | " |
| James Lauderdale | Governor | Colo. |
| Joan Fulks | Lt. Governor | " |
| Lyle Fulks | U. of Colo., Bd. Reg. | " |
| Jack Lieberman | U.S. Sen. | Fla. |
| Frank Lord | Governor | " |
| Linda Jenness | Governor | Ga. |
| Joe Cole | U.S. Cong. 4th Dist. | " |
| Lynn Henderson | U. S. Sen. | Ill. |
| Naomi Allen | State Treas. | " |
| Kim Allen | Supt. Public Inst. | " |
| Willie Petty | Cash Co. Sheriff | " |
| Nancy Cole | U. of Ill., Bd. of Govs. | " |
| Mark Ugolini | U. of Ill., Bd. of Govs. | " |
| Deborah Notkin | U. of Ill., Bd. of Govs. | " |
| Peter Camejo | U.S. Sen. | Mass. |
| Michael Kelly | Governor | " |
| Joe Miles | U.S. Cong. 9th Dist. | " |
| Toba Leah Singer | Atty. Gen. | " |
| Paul Lodico | U.S. Sen. | Mich |
| George Bouse | Governor | " |
| Evelyn Kirsch | Lt. Governor | " |
| John Hawkins | Secy. of State | " |
| Ron Reosti | Atty. Gen. | " |
| Jacqueline Rice | U.S. Cong. 1st Dist. | " |
| Walter Kos | U.S. Cong. 15th Dist. | " |
| Marcia Wisch | U. of Mich., Bd. of Reg. | " |
| Tom Vernier | U. of Mich., Bd. of Reg. | " |
| Nancy Strebe | U.S. Sen. | Minn.. |
| Derrel Myers | U.S. Cong. 5th Dist. | " |
| Mimi Harary | Governor | " |
| Kipp Dawson | U. S. Sen. | N.Y. |
| Clifton DeBerry | Governor | " |
| Jon Rothschild | Lt. Governor | " |
| Paul Boutelle | U.S. Cong. 18th Dist. | " |
| Eva Chertov | U.S. Cong. 19th Dist. | " |
| Miguel Padilla | Atty. Gen. | " |
| Ruthann Miller | Comptroller | " |
| Hedda Garza | Nassau Co. Exec. | " |
| James Harris | U.S. Sen. | Ohio |
| Marcia Sweetenham | Governor | " |

| | | | |
|-------------------|--------------------------|-------------|-------|
| Herman Kirsch | Lt. Governor | | Ohio |
| Syd Stapleton | U.S. Cong. | 22nd Dist. | " |
| Al Budka | Atty. Gen. | | " |
| Bob Schwartz | Treas. | | " |
| Robin Maisel | U.S. Sen. | | Pa. |
| Frederick Stanton | Governor | | " |
| Mark Zola | Lt. Governor | | " |
| Arnold Terry | State Rep. | 198th Dist. | " |
| Carol Lisker | State Rep. | 187th Dist. | " |
| Daniel Fein | U.S. Sen. | | R.I. |
| John Powers | Governor | | " |
| Joseph Traugott | Lt. Governor | | " |
| Mariana Hernandez | U.S. Sen. | | Texas |
| Dan Styron | Governor | | " |
| Travis Burgeson | U.S. Cong.-at-large | | " |
| Bill Massey | U.S. Sen. | | Wash. |
| Stephanie Coontz | U.S. Cong. | 1st Dist. | " |
| Russell Block | U.S. Cong. | 7th Dist. | " |
| Rick Congress | U.S. Cong. | 6th Dist. | " |
| Harriet Ashton | State Sen. | 32nd Dist. | " |
| Sue Shinn | State House | 32B Dist. | " |
| Martha Quinn | U.S. Sen. | | Wisc. |
| Samuel Hunt | Governor | | " |
| Peter Kohlenberg | Lt. Governor | | " |
| Patrick Quinn | State Legis. | 2nd Dist. | " |
| Fred Lovgren | U. of Ill., Bd. of Govs. | | Ill. |
| Peter Manti | State Assem., Milw. | 3rd Dist. | Wisc. |

1971

| | | | |
|-----------------------|------------------------|----------|------------|
| John Powers | Mayor, Boston | | Mass. |
| Mark Freidman | School Comm., Boston | | " |
| John McCann | City Counc., Boston | | " |
| Debby Leonard | Mayor, Houston | | Texas |
| Paul McKnight | City Counc., Houston | | " |
| Jeanette Tracy | City Counc., Houston | | " |
| Maureen Jasin | City Counc., Houston | | " |
| Manuel (Tank) Barrera | School Bd., Houston | | " |
| John Hawkins | Mayor, Cleveland | | Ohio |
| Gary Johnson | City Counc., Seattle | | Wash. |
| Russell Block | City Counc., Seattle | | " |
| Rhea Rolfe | City Counc., Seattle | | " |
| Gail Shangold | City Counc., Seattle | | " |
| Eric Poulos | City Counc., Worcester | | Mass. |
| Kay Lyden | City Counc., Worcester | | " |
| Brent Farranal | City Counc., Worcester | | " |
| Nat Weinstein | Mayor, San Francisco | | Calif. |
| Laura Dertz | Bd. of Supervs., S.F. | | " |
| Jeff Berchenko | Bd. of Supervs., S.F. | | " |
| Jane Sica | Bd. of Supervs., S.F. | | " |
| Milton Chee | Bd. of Supervs., S.F. | | " |
| Bonnie Sheppard | Bd. of Supervs., S.F. | | " |
| Mark Schneider | Bd. of Supervs., S.F. | | " |
| James Harris | Non-Voting Cong. Del. | | Wash. D.C. |
| Linda Sheppard | Mayor, Chicago | | Ill. |
| Cynthia Burke | Aldерwoman, Chicago | 5th Ward | " |
| Willy Petty | Treas., Chicago | | " |
| Naomi Allen | Aldерwoman, Chicago | | " |
| Mark Ugolini | City Clk., Chicago | | " |

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|---------------------|--|--------|
| Baxter D. Smith | Bd. of Educ., L.A. | Calif. |
| Barbara C. Peterson | L.A. Comm. Coll. Bd. of Trustees Pos. 1 | " |
| James Little | L.A. Comm. Coll. Bd. of Trustees Pos. 5 | " |
| Bill Perdue | Mayor, Denver | Colo. |
| Carolyn Jasin | City Council, Denver | " |
| Al Rosenthal | Councilman-at-large, Denver | " |
| Mary Walters | School Bd., Denver | " |
| Antonio Camejo | Mayor, Berkeley | Calif. |
| Andrea Land | City Council, Berkeley | " |
| Alan Wald | City Council, Berkeley | " |
| Anita Bennett | Cand. City Council, Berkeley | " |
| Mary Lou Montauk | Bd. of Educ., Berkeley | " |
| Mariana Hernandez | Mayor, Austin | Texas |
| Karin Salzman | City Council, Austin | " |
| Laura Maggi | City Council, Austin | " |
| Mike Alewitz | City Council, Austin | " |
| Peter Graumann | Peralto Jr. Coll., Bd. of Trustees, Oakland | Calif. |
| Jean Savage | Mayor, Phila. | Pa. |
| Hatti McCutcheon | Sheriff, Phila. | " |
| Carol Lisker | City Council, Phila. | " |
| Pamela Newman | City Council, Phila. | " |
| Salvatore Mastriano | City Council, Phila. | " |
| Mark Zola | City Council, Phila. | " |
| Susan Vass | Mayor, Minneapolis | Minn. |
| Greg Guckenburg | Councilman 6th Ward | " |
| Lisa Potash | School Bd., Cambridge | Mass. |
| Gloria Albee | School Bd., Cambridge | " |
| Jeanne Lafferty | City Council-Mayor, Cambridge | " |
| Terry Bell | City Council, Cambridge | " |
| Toba Singer | City Council, Cambridge | " |
| Sara Ullman | City Council, Cambridge | " |
| William Scheer | City Council, Cambridge | " |

1972

| | | |
|-------------------|--------------------------|--------|
| Linda Jenness | Pres. U.S. | |
| Andrew Pulley | V. Pres. U.S. | |
| Susan Vass | U.S. Cong. 5th Dist. | Calif. |
| Peggy Bunn | U.S. Cong. 6th Dist. | " |
| Ken Miliner | U.S. Cong. 7th Dist. | " |
| Linda Thompson | U.S. Cong. 8th Dist. | " |
| Dean Reed | U.S. Cong. 17th Dist. | " |
| Dennis Scarla | U.S. Cong. 18th Dist. | " |
| Don Belcher | U.S. Cong. 21st Dist. | " |
| Carole Newcombe | U.S. Cong. 26th Dist. | " |
| Bonnie Aptekar | U.S. Cong. 28th Dist. | " |
| Mariana Hernandez | U.S. Cong. 30th Dist. | " |
| Laura Moorhead | U.S. Cong. 37th Dist. | " |
| Kathryn Pon | State Assem. 11th Dist. | " |
| Marilyn Winch | State Assem. 16th Dist. | " |
| John Ratliff | U.S. Cong. 3rd Dist. | Conn. |
| Fern Gapin | U.S. Cong. 1st Dist. | Colo. |
| Joel Hauptman | U.S. Cong. 2nd Dist. | " |
| Jon Hillson | U. of Colo., Bd. of Reg. | " |
| Jack Lieberman | U.S. Cong. 2nd Dist. | Fla. |
| Alice Conner | U.S. Sen. | Ga. |
| Keith Jones | U.S. Cong. 5th Dist. | " |

| | | |
|-----------------------|-------------------------------|--------|
| Meg Rose | Fulton Co. Sheriff | Ga. |
| Nina Knapp | State Sen. 18th Dist. | Idaho |
| Fred Halstead | U.S. Sen. | Ill. |
| Patricia Grogan | Governor | " |
| Antonio De Leon | Lt. Governor | " |
| Ed Jurenas | Secy. of State | " |
| Suzanne Haig | Atty. Gen. | " |
| Norman Oliver | Cook Co. State Atty. | " |
| David Saperstan | Comptroller | " |
| Patricia Reedy | U. of Ill., Bd. of Tr. | " |
| Bill Rayson | U. of Ill., Bd. of Tr. | " |
| Robert Lewis | U. of Ill., Bd. of Tr. | " |
| Don Gurewitz | U.S. Sen | Mass. |
| John Powers, Jr. | U.S. Cong. 8th Dist. | " |
| Jean Lafferty | U.S. Cong. 9th Dist. | " |
| Linda Nordquist | U.S. Sen. | Mich. |
| Maceo Dixon | U.S. Cong. 1st Dist. | " |
| Nancy Kimker | U.S. Cong. 13th Dist. | " |
| Christy Wallace | U.S. Cong. 17th Dist. | " |
| Claytee Artz | Detroit Bd. of Educ. | " |
| Barbara Fox | Detroit Bd. of Educ. | " |
| Mary Hillery | U.S. Sen. | Minn. |
| Bill Peterson | U.S. Cong. 5th Dist. | " |
| Hedda Garza | U.S. Cong. 5th Dist. | N.Y. |
| John Hawkins | U.S. Cong. 12th Dist. | " |
| James Mendieta | U.S. Cong. 14th Dist. | " |
| Susan Winsten | U.S. Cong. 16th Dist. | " |
| Dianne Feeley | U.S. Cong. 17th Dist. | " |
| Rebecca Finch | U.S. Cong. 18th Dist. | " |
| B. R. Washington | U.S. Cong. 19th Dist. | " |
| Joanna Misnik | U.S. Cong. 20th Dist. | " |
| Elizabeth Jayko | State Assem. 28th Dist. | " |
| Herman Kirsch | U.S. Cong. 20th Dist. | Ohio |
| Cecil Lampkin | U.S. Cong. 21st Dist. | " |
| Caryl Loeb | U.S. Cong. 22nd Dist. | " |
| Roberta Scherr | U.S. Cong. 23rd Dist. | " |
| Rita Moran | U.S. Sen | Oregon |
| John Studer | Secy. of State | " |
| Peter Graumann | State Treas. | " |
| George Kontanis | D.A., Multnomah Co. | " |
| Nancy Strebe | U.S. Cong. 1st Dist. | Pa. |
| Rose Ogden | U.S. Cong. 4th Dist. | " |
| Harvey McArthur | State Treas. | " |
| Joseph Saunders | State Auditor Gen. | " |
| Jean Savage | State House 187th Dist. | " |
| Pat DeTemple | U.S. Sen. | R.I. |
| Tom Leonard | U.S. Sen. | Texas |
| Debby Leonard | Governor | " |
| Mike Alewitz | Lt. Governor | " |
| Tom Kincaid | Atty. Gen. | " |
| Susan Ellis | U.S. Cong. 8th Dist. | " |
| Melissa Singler | U.S. Cong. 10th Dist. | " |
| Manuel "Tank" Barrera | U.S. Cong. 18th Dist. | " |
| Steve Wattenmaker | U.S. Cong. 20th Dist. | " |
| Evelyn Sell | State Bd. of Educ. 18th Dist. | " |
| Laura Maggi | State House 37th Dist. | " |
| David Rossi | State House 86th Dist. | " |
| Derek Jeffers | State Senate 14th Dist. | " |
| Anne Springer | Comptroller | " |

| | | |
|----------------|--------------------------------|------------|
| Howard Petrick | Commissioner, Gen. Land Office | Texas |
| Eric Sell | D.A., Travis City | " |
| Brad Kahn | Sheriff, Travis City | " |
| Maureen Jasin | Harris Co. Commis. Prec. 3 | " |
| Robin David | Governor | Wash. |
| Anne Montague | Secy. of State | " |
| Joann Cormier | Atty. Gen. | " |
| Craig Hounts | U.S. Cong. 1st Dist. | " |
| Judy Moschetta | U.S. Cong. 7th Dist. | " |
| Gary Johnson | Supt. Public Ins. | " |
| Herman Fagg | Non-Voting Deleg. | Wash. D.C. |

1973

| | | |
|-----------------------|---|------------|
| John Powers | City Counc., Boston | Mass. |
| Ruth Getts | School Comm., Cambridge | " |
| Diana Travis | School Comm., Cambridge | " |
| Jane Roland | City Counc., Cambridge | " |
| Carol Henderson Evans | City Counc., Cambridge | " |
| Nancy Charpentier | City Counc., Cambridge | " |
| Roberta Scherr | Mayor, Cleveland | Ohio |
| Maceo Dixon | Mayor, Detroit | Mich. |
| Rachele Fruit | Common Counc., Detroit | " |
| Lee Artz | School Bd., Detroit | " |
| Dan Fein | Mayor, Houston | Texas |
| Brenda Brdar | City Council Houston Dist. C | " |
| Kathy Stallworth | City Counc.-at-large, Houston Pos. 1 | " |
| Kris Vasquez | School Bd., Houston | " |
| Jane Van Deusen | Mayor, Minneapolis | Minn. |
| Martin Anderson | City Counc. Ward 2 | " |
| Betsy Farley | City Counc. Ward 6 | " |
| Henry Scheer | City Counc. Ward 8 | " |
| Norman Oliver | Mayor, N.Y.C. | N.Y. |
| Dick Roberts | Controller, N.Y.C. | " |
| Joanna Misnik | City Council Pres. | " |
| B.R. Washington | Man. Boro. Pres. | " |
| Richard Ariza | Man. Counc.-at-lge. | " |
| Eva Chertov | City Counc. 3rd Dist. | " |
| Maxine Williams | B'klyn. Boro. Pres. | " |
| Mark Friedman | B'klyn. Counc.-at-lge. | " |
| James Mendieta | B'klyn. D.A. | " |
| Bruce Kaufman | Phila. D.A. | Pa. |
| Harvey McArthur | Controller, Phila. | " |
| Paul Le Blanc | Mayor, Pitts. | " |
| Christina Adachi | City Counc., Pitts. | " |
| Andrew Nakrin | City Counc., Pitts. | " |
| Carole Seligman | Bd. Supervisors, S.F. | Calif. |
| Howard Wallace | Bd. Supervisors, S.F. | " |
| Hanna Takashige | Bd. Supervisors, S.F. | " |
| Elizabeth Cox | Bd. Supervisors, S.F. | " |
| Steve Wattenmaker | Bd. of Supervisors, S.F. | " |
| Craig Honts | Mayor, Seattle | Wash. |
| Eric Huffman | City Counc., Seattle Pos. 3 | " |
| Gary Johnson | City Counc., Seattle Pos. 1 | " |
| Louise Pitell | City Counc., Seattle Pos. 4 | " |
| Clare Fraenzl | School Bd., Seattle | " |
| Omari Musa | School Bd.-at-lge. | Wash. D.C. |

| | | |
|----------------------|--|------------|
| Erich Martel | School Bd.-at-lge. | Wash. D.C. |
| Nan Bailey | School Bd. Ward 2 | " |
| Jim Harris | School Bd. Ward 3 | " |
| Froben Lozada | Rent Cont. Bd., Berkeley | Calif. |
| Mary Lou Montauk | Rent Cont. Bd., Berkeley | " |
| Brian Williams | Rent Cont. Bd., Berkeley | " |
| Ceryl Sholin | Rent Cont. Bd., Berkeley | " |
| Kathryn Pon | Rent Cont. Bd., Berkeley | " |
| Olga Rodriguez | Mayor, L.A. | " |
| David Hammerstein | Bd. of Educ., L.A. | " |
| Walter Lippmann | Bd. of Educ., L.A. | " |
| Mariana Hernandez | Bd. of Trustees, Community Coll., L.A. | " |
| Arnie Weissberg | Bd. Trustees, Community Coll., L.A. | " |
| Natalie Bombara | Bd. Trustees, Community Coll., L.A. | " |
| Leslie Dork | State Senate San Diego 38th Dist. | " |
| Debby Bustin | Mayor, Atlanta | Ga. |
| Joel Aber | Vice-Mayor, Atlanta | " |
| Mike Weissman | School Bd., Atlanta | " |
| Nina Martin | Alderwoman, Atlanta Ward 6 | " |
| Steve Fuchs | City Counc., Austin Place 5 | Texas |
| Melissa Singler | Mayor, Austin | " |
| James Burfiend | City Counc., Austin Place 2 | " |
| Ken Miliner | City Counc., Berkeley | Calif. |
| Kathryn Pon | City Counc., Berkeley | " |
| Nancy Mackler | City Counc., Berkeley | " |
| Brian Williams | City Counc., Berkeley | " |
| Doug Hewell | Bd. of Ed., Berkeley | " |
| Frank Manning | Nassau Co. Exec. | N.Y. |
| Dorothy "Salm" Kolis | City Counc., San Diego | Calif. |
| Leslie Dork | City Counc., San Diego | " |
| Susan Christie | City Counc., San Diego | " |
| Lori Adolewski | City Counc., San Diego | " |
| Holbrook Mahn | San Diego School Bd. | " |
| Reiko Obata | San Diego School Bd. | " |
| Marta Richmond | Cam. Coll. Governing Bd., San Diego | " |
| Dennis Scarla | Cam. Coll. Governing Bd., San Diego | " |

1974

| | | |
|----------------------|-----------------------|--------|
| Olga Rodriguez | Governor | Calif. |
| Dan Styron | Senator | " |
| Roland Sheppard | Lt. Governor | " |
| Laura Moorehead | Atty. Gen. | " |
| Peggy Wilson | Secy. of State | " |
| Mariana Hernandez | Sup. of Pub. Ins. | " |
| James Lewis | Controller | " |
| Ken Devey | Treasurer | " |
| Dorothy "Salm" Kolis | U.S. Cong. 41st Dist. | " |
| Nat Weinstein | U.S. Cong. 5th Dist. | " |
| Omari Musa | U.S. Cong. 28th Dist. | " |
| Paul Boutelle | U.S. Cong. 8th Dist. | " |
| Virginia Garza | U.S. Cong. 25th Dist. | " |
| Raul Gonzales | State Sen. Dist. 24 | " |
| Jack Marsh | Senator | Colo. |

| | | | |
|-----------------------|---------------------------|------------|------------|
| Nora Daniels | Governor | | Colo. |
| Joel Hauptman | U.S. Cong. | 1st Dist. | " |
| Vince Egan | Governor | | Georgia |
| Elizabeth Lariscy | Senator | | " |
| Anne Teasdale | Lt. Gov. | | " |
| James Harris | U.S. Cong. | 5th Dist. | " |
| Ed Heisler | Senator | | Ill. |
| Willie Reid | U.S. Cong. | 1st Dist. | " |
| Dave Colton | Senator | | Indiana |
| Harold Schlechtweg | U.S. Cong. | 7th Dist | " |
| Donald Gurewitz | Governor | | Mass. |
| David Jerome | Lt. Gov. | | " |
| Jeanne Lafferty | Atty. Gen. | | " |
| Jeannette Tracy Bliss | U.S. Cong. | 9th Dist. | " |
| Robin Maisel | Governor | | Mich. |
| Ruth Getts | Lt. Gov. | | " |
| B. R. Washington | Atty. Gen. | | " |
| Rachele Fruit | Secy. of State | | " |
| Trudy Hawkins | State Bd. of Ed. | | " |
| Lee Artz | State Bd. of Ed. | | " |
| Jane Van Deusen | Governor | | Minn. |
| Ralph Schwartz | Lt. Gov. | | " |
| Ed Jurenas | U.S. Cong. | 5th Dist. | " |
| Barbara Mutnick | Senator | | Missouri |
| Derrick Morrison | Governor | | New York |
| Rebecca Finch | Senator | | New York |
| James Mendiotta | Lt. Gov. | | New York |
| Sam Manuel | State Comptroller | | New York |
| Ray Markey | Atty. Gen. | | New York |
| Maxine Williams | U.S. Cong. | 12th Dist. | New York |
| Claire Moriarty | U.S. Cong. | 20th Dist. | New York |
| Katherine Sojourner | U.S. Cong. | 18th Dist. | New York |
| Robb Wright | U.S. Cong. | 16th Dist. | New York |
| Nancy Brown | Governor | | Ohio |
| Phil Lazar | Senator | | Ohio |
| Carol Knowles | Atty. Gen. | | Ohio |
| Herman Kirsch | Lt. Gov. | | Ohio |
| Charles Mitts | U.S. Cong. | 1st Dist. | Ohio |
| Bernie Senter | U.S. Cong. | 23rd Dist. | Ohio |
| Roberta Scherr | Governor | | Penna. |
| Christina Adachi | Senator | | Penna. |
| Tony Austin | U.S. Cong. | 2nd Dist. | Penna. |
| Lea Tammi | | | Penna. |
| Stacey Seigle | Governor | | Oregon |
| John Studer | Senator | | Oregon |
| John Lemon | St. Supt. of Public Inst. | | Oregon |
| Caroline Fowlkes | St. Labor Comm. | | Oregon |
| Robin Mace | City Council #3 | | Oregon |
| Sherry Smith | Governor | | Texas |
| Dan Fein | Lt. Gov. | | Texas |
| Pedro Vasquez | Atty. Gen. | | Texas |
| Rick Congress | Railroad Comm. | | Texas |
| Bill Rayson | Land Comm. | | Texas |
| Saskia Scoggins | Controller | | Texas |
| Kris Vasquez | U.S. Cong. | 18th Dist. | Texas |
| Jill Fein | U.S. Cong. | 22nd Dist. | Texas |
| Sara Johnston | U.S. Cong. | 18th Dist. | Texas |
| Don Sorsa | 90th Dist. Houst of Reps. | | Texas |
| Nan Bailey | Mayor | | Wash. D.C. |
| Toba Singer | Non-Voting Dele. | | Wash. D.C. |

| | | |
|---------------|--------------------|----------------------|
| Al Budka | Chmn., City Counc. | Wash. D.C. |
| Clare Fraenzl | Senator | Washington |
| Fred Lovgren | U.S. Cong. | 1st Dist. Washington |

2(a). Plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d). However, the existence and holders of national office are well publicized and are as follows:

- A. SWP: National Chairman, Emeritus: James P. Cannon
National Secretary: Jack Barnes
National Organization Secretary: Barry Sheppard
- B. YSA: National Chairman: Andrew Pulley
National Secretary: Rich Finkel
National Organizational Secretary: Delfine Welch

2(b). Plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d).

2(c). See response to No. 2(a). Insofar as No. 9(c) seeks names and addresses of the holders of other positions, plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d).

2(d). Plaintiffs object on the ground that the information requested is not relevant to the claim or defense of any party and does not appear reasonably calculated to lead to the discovery of relevant evidence. In addition, plaintiffs object on the ground that this interrogatory (together with many others in this set) was propounded for the improper purpose of harassing and intimidating plaintiffs and potential witnesses in this case.

- 3. Plaintiffs object on the grounds stated under No. 2(d).
- 4. Plaintiffs object on the grounds stated under No. 2(d).
- 5. Plaintiffs object on the grounds stated under No. 2(d).
- 6. Plaintiffs object on the grounds stated under No. 2(d).
- 7. Plaintiffs object on the grounds stated under No. 2(d).
- 8. Plaintiffs object on the grounds stated under No. 2(d).

9(a). Plaintiffs object on the grounds stated under No. 2(d).

9(b). Plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d).

9(c). Plaintiffs object on the ground stated under No. 2(d).

9(d). Plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d).

9(e). Plaintiffs object on the ground stated under No. 1(b) and, in addition, on the ground stated under No. 1(d).

10. Plaintiffs object on the ground stated under No. 2(d).

11. Plaintiffs object on the ground stated under No. 2(d).

12. Plaintiffs object on the ground stated under No. 2(d), and on the additional ground that information concerning plaintiffs' travels and meetings among themselves and with others is privileged by the First Amendment and the Due Process Clause of the Fifth Amendment.

13; 14; 15. Plaintiffs object on the ground stated under No. 12.

16. Plaintiffs object on the grounds stated under No. 2(d).

17(a). Plaintiffs Jenness' birthday is January 11, 1941. Had she been elected in 1972, she would have been 32 years of age at the expiration of President Nixon's first term. Had she received sufficient popular support to become elected, she would have called for an immediate constitutional amendment lowering the minimum age requirements for all federal elective offices including the Presidency. It is impossible to state precisely "the age she would have been at the time she would have assumed the office" because that time could have been January 20, 1973, or such later date as was the sooner of (i) the date of ratification of the amendment, or (ii) January 11, 1976, her 35th birthday.

17(b). Yes; see answer to 17(a).

17(c). Not applicable.

18(a). Plaintiff Pulley's birthday is May 5, 1951. His age at the time he would have assumed office cannot be determined for the reasons stated in answer to No. 17(a).

18(b). Yes; see answer to No. 17(a).

18(c). Not applicable.

18(d). Plaintiff Pulley assumed the office in November, 1972. The duties of this office include supervising and helping to direct the national work of YSA (including work on election campaigns), implementing policies determined at YSA national conventions, and acting as a spokesman for YSA.

19(a) and (b).

| <u>Name</u> | <u>Birthday</u> | <u>Eligible Age Under Present Law</u> |
|-------------------|-----------------|---|
| Christy Wallace | Nov. 12, 1948 | 25 |
| Deborah P. Bustin | Dec. 19, 1947 | 18 |
| Maceo Dixon | June 27, 1949 | 30 |
| Dan Fein | May 30, 1945 | 21 |
| Craig Honts | Aug. 29, 1951 | 21 |
| Norman Oliver | Sept. 18, 1950 | 18 |
| Roberta L. Scherr | Jan. 14, 1953 | 18 |
| Jane Van Deusen | April 9, 1949 | 18 |

Mr. Bolduc supervised and coordinated the work of the local election campaign committee. Insofar as national campaign policy was concerned, his role was to plan and supervise implementation on the local level.

21. Mr. Cannon was National Chairman from 1953 until May of 1972. His duties included helping to supervise and coordinate the party's election campaigns and other programs. At present he is preparing speeches, letters and memoirs for publication.

22. Plaintiffs object on the grounds stated under No. 2(d).

23. Plaintiffs object on the grounds stated under No. 2(d).

24(a). It is contended that defendants and/or their predecessors met on specific occasions in order to agree to the common design. The specific dates and locations of the meetings have been concealed by the defendants and therefore are unknown to plaintiffs except as described in Answer to No. 25 below. As to other meetings the basis for plaintiff's contention is that a common design or agreement is evidenced by the systematic occurrence of the acts complained of throughout a 26 year period.

24(b). It is contended that there are many things in writing and otherwise recorded relating to such an agreement or common design. Most of these writings and recordings have been concealed by defendants and their details are therefore unknown to plaintiffs. Among the writings and recordings which are known to plaintiffs are the Attorney General's List and all of the documents sought by plaintiff pursuant to pending discovery requests in this case. For detailed descriptions, see the said requests and the federal defendants' responses to date.

24(c). See answers to Nos. 30 & 31, 41-3, 45,38, 49-51, 54, 56, 57-9.

25(a). It is contended that these individuals met and agreed to implement and expand the agreement. They met in various combinations on several occasions for this purpose. The specific dates and locations of these meetings were and are concealed by defendants and therefore most of them are unknown to plaintiffs. One such meeting occurred on June 5, 1970 in the Oval Office at the White House. The basis on which it is alleged that such an agreement was the subject of this meeting is testimony of John Dean (with exhibits), John Ehrlichman and others given to the Senate Select Committee on Presidential Campaign Activities during the summer of 1973. This testimony concerns the so-called Huston Plan.

25(b). It is contended that there are writings and recordings relating to this agreement. Most of the documentation has been concealed by defendants and therefore is unknown to plaintiffs. However, on the basis of the above-mentioned testimony before the Select Committee, plaintiffs contend that there is a tape recording of the meeting of June 5, 1970 in the Oval office, a tape recording of a second meeting, pursuant to which defendant Haldeman announced on July 14, 1970 that defendant Nixon had approved the Huston Plan; and a document of about 45 pages entitled "Special Report of the Inter-Agency Committee on Intelligence Ad Hoc," dated June 1970.

25(c). Most relevant acts of the named defendants were covert and are not yet known in detail. However, on or about July 14, 1970, defendants Nixon and Haldeman issued a written order putting the Huston Plan into effect.

26. It is contended that a plan, agreement or common design was implemented prior to July 1970. As to the basis of this contention and the extent of such implementation, see Answer to No. 24(a), above.

27. Excessive interrogation means official questioning over and above what is required in order to serve any legitimate governmental purpose. For detailed examples, see answers to numbers 41 through 45 below.

28. See answers to Nos. 41 through 45 below.

29. See answers to Nos. 45 through 47 below.

30 & 31. "Other harassment" includes the making of "pretext calls" by FBI agents. This form of harassment consists of an FBI agent telephoning a member or supporter of the SWP or YSA (or his or her family) and assuming a fictitious identity in order to gain information or otherwise harass the individual. Such a call was made in Philadelphia, Pennsylvania on November 20, 1970 by FBI special agent, James L. O'Connor. O'Connor telephoned the mother of YSA member Virginia Thomas. He pretended to be a friend passing through Philadelphia and asked Thomas's mother where Thomas could be found. This pretext call is documented in an official FBI memorandum obtained from the FBI office in Media, Pennsylvania, in September of 1971. Another such incident occurred in Philadelphia in 1973, when an unknown agent posing as Stu Singer telephoned the parents of Ed Fruit and questioned them about Fruit. In the New York area, agents making pretext calls usually pretend to be court officials attempting to locate an individual in connection with jury duty. Such calls were received by Sarah Gates in June of 1972; Linda Slodki, September 28, 1973; Dave Salner, Spring of 1972; Andrew Bustin, November 23, 1973; Arlene Rubinstein, January, 1973; Jean Fargo, April 1973; Jane Fisher, Fall 1972; Vangie Eidsvik, July 31, 1973; Diane Shur, July 13, 1973; parents of Phyllis Kittler, Spring 1972; Jack Barnes, March 30, 1974; Mimi Pichey, June 1973. The true names of the agents are unknown. In the Slodki, Bustin, Fisher, Eidsvik and Barnes incidents, the agent identified himself as a Mr. Grossman. In the Shur incident the agent identified himself as Jeremiah Jones. As to specific damage or injury, see Nos. 62-3 below.

32. See answer to No. 53 below.

33. See answer to No. 55 below.

34. See answer to No. 56 below.

35. See answer to No. 57 below.

36(a). Defendants have attempted to conceal all of the means used to spy on plaintiffs. Many of their techniques are therefore unknown to plaintiffs. An example of a specific "other illegal means," however, is defendants' use of informers and undercover agents to infiltrate and spy on lawful political activities.

36(b). Many of these instances are successfully concealed by defendants. However, FBI agents approached the following persons, among others, and requested them to spy upon plaintiffs and convey information to the FBI concerning plaintiffs' activities.

1. Sheri Nolan, approached in Denver, Colorado in February of 1972.
2. Jose G. Perez, approached in Sarasota, Florida in February or March of 1971.
3. John Bocchicchio, approached in Cleveland, Ohio in October of 1972.

From about 1961 until November of 1973, John Hollowell was a member of SWP in San Diego, California. During most or all of this period he worked for the FBI as an informer.

37. Plaintiffs object to No. 37 on the ground that it is incomprehensible. Par. 35 of the complaint relates to defendants' purposes, not to any deterrence experienced by plaintiffs.

38. Plaintiffs object to No. 38 on the same ground as No. 37.

39. The allegation that the defendants and their predecessors caused the events is based on the fact that throughout the period since 1948 no one else possessed the power and authority to cause them. Any documentation is in defendants' possession and concealed by them. As to meetings between defendants and/or their predecessors, see Answer to Nos. 24 and 25 above.

40. The "variety of handicaps" referred to are the same handicaps as are imposed by the acts described in Paragraphs 39 through 77 of the complaint, and particularized in these Answers to Interrogatories.

41. There follows a partial list of comparatively recent incidents as described in paragraphs 39-42 of the complaint. Plaintiffs do not know the exact duration of the contacts or surveillances, but they range from approximately five minutes to more than an hour. The names of the members, supporters and candidates, who were the subjects of the contact or surveillance, are underscored. In some instances the names of the agents are unknown. In all instances (except where specifically noted) the specific facts which lead plaintiffs to conclude that defendants or their agents are responsible are that the agents represented themselves as FBI agents and/or displayed what appeared to be genuine FBI identification. As to the injury caused by these incidents, see Nos. 45(g) and 62.

(1) In the Fall of 1970, in Tampa, Florida, FBI personnel visited Earnest Able's employer, Tampa Ship Repair and Dry Dock Company, and told the employer that Able was a communist. The company fired Able, citing the FBI visit as the reason.

(s) In the Fall of 1972, in Farmington, Michigan, two FBI agents visited Gail Altenburg's parents and asked them questions about her whereabouts.

On February 26, 1973, FBI Agent Blake called Altenburg's dormitory room at Kalamazoo College and asked to see her the next morning at 10:00 A.M. On February 27, 1973, she went to FBI headquarters in Kalamazoo. Agent Blake took her to a conference room and questioned her. He said the SWP had been classified as subversive by the Attorney General since 1955. He tried to convince her that she should quit the YSA. He warned of possible harm to her career if she remained in YSA.

(3) On March 1973, in Burbank, California, FBI personnel visited Catherine Anderson's apartment building, 441 Pass Avenue, and questioned the owner about her. They said their investigation "involved the security of the United States."

(4) In September 1971, in Albany, New York, FBI agents question Richard Ariza's former landlord about him. Agents also questioned the new occupants of his old apartment about him. A personal friend of Ariza's was visited by two FBI agents and questioned about him. Ariza called the FBI office to protest these inquiries, whereupon they summoned him to the federal building and interrogated him about his association with YSA. They questioned him about each of the members of the YSA in Albany and about Ruben Montare, a member in New Jersey. They questioned him about the YSA's political positions.

(5) In May 1970, in Los Angeles, California, FBI agent(s) visited the landlady of Louise Armstrong's apartment, at 517 S. Rampart, and questioned her about Armstrong's employment, personal character and political views.

(6) In September 1972, in Detroit, Michigan, FBI agents visited George Bachert, landlord of an apartment building at 120 Seward, and showed him pictures of several tenants, all of whom were SWP supporters. The agents questioned Bachert about plaintiffs Maceo Dixon and Christy Wallace, and also about Claytee Artz, Lee Artz, Vanessa Artz, Bill Grettor, Sandy Knoll and Barry Sell. The agents characterized plaintiff Dixon (then a candidate for election to the U.S. House of Representatives) as a "dangerous person."

(7) In the Fall of 1972, in Denver, Colorado, two FBI agents visited Dennis Atkins' employer, Concentrated Employment Program, and asked to speak to him. They characterized SWP as advocating violent overthrow of the U.S. Government. They asked him to help them compile a list of SWP members and supporters in the Denver area and to work for them as an informer.

(8) On December 13, 1972, in Detroit, Michigan, Jeff Berenchenko received a message at Detroit SWP headquarters asking him to call 965-2373, ext. 358. He dialed this number and a voice answered "FBI." He hung up.

(9) On two occasions during December 1969, in New York, New York, FBI personnel visited the landlady of Larry Birkner's apartment building and tried to ask her questions about him.

(10) In February 1970, in Portland, Oregon, FBI personnel visited Larry Birkner's employer, Pathology Central Laboratories and questioned them about him. As a result of the visit, Birkner was fired.

(11) On August 8, 1973, in Flint, Michigan, an FBI agent visited Ollie Bivens' family home and interrogated him about the YSA and his political activity. His parents were upset and have since attempted to induce him to resign from YSA.

(12) In the Winter of 1973, in Philadelphia, Pennsylvania, an FBI agent telephoned the employer of the mother of Debs Bleicher. He asked to speak to Bleicher's mother and questioned her about her son's activity. Later, Agent Charles Warner called Bleicher at home and questioned him about the YSA and SWP. Agent Warner asked Bleicher for names and addresses of other members and asked him to collaborate with FBI.

(13) In the Spring of 1971, in Houston, Texas, FBI personnel visited Mrs. Dever, the owner of 3914 Dallas Street, and questioned her about David Bliss, one of her tenants.

(14) In 1968, in Newark, New Jersey, FBI personnel visited the superintendent of Walter Brod's apartment at 425 Mt. Propsect Avenue, Newark, New Jersey, and asked questions about Brod. At about the same time, two FBI agents accosted Brod as he left his place of work, the Salvation Army, and questioned him about the YSA and SWP. They characterized both groups as subversive.

(15) In 1968, in New York, New York, two FBI agents visited Ed Bromberg's apartment at 150 West 21st Street, Apartment 6-G and attempted to question him. They advised him he should "start helping" his country.

(16) In 1968, in Madison, Wisconsin, FBI personnel visited Peggy Bunn's father on several occasions and questioned him about Bunn's activities.

(17) In 1970, in New Bedford, Massachusetts, FBI personnel visited Peggy Bunn's employer, WTEV-TV, and told them about Bunn's activity in support of SWP. The employer told Bunn that the FBI had implied she should be fired.

(18) In August 1970, in Washington D.C., FBI personnel searched Bonnie Cady's personal belongings located at 3503 Spring-land Lane, N.W., and removed political literature.

(19) In November 1970, in New York, New York, FBI personnel visited the superintendent of Bonnie Cady's (then Bonnie Aptekar) apartment building at 522 East 11th Street, and asked questions about her. They asked to be admitted to her apartment, but the superintendent refused.

(20) In November 1972, in San Diego, California, FBI personnel visited Bonnie Cady's former employer, Ets-Hopkins & Galvin Corporation and asked questions about her.

(21) On May 23, 1973, in Boulder, Colorado, two FBI agents (one named Smith) visited Robert Capistrano's apartment and asked him questions about the whereabouts of Skip Ball.

(22) In July 1972, in Los Angeles, California, FBI personnel visited the neighbors on either side of Anne Chase's family's home and questioned them about her whereabouts. The

agents told the neighbors that their investigation had to do with subversives and might involve a morals charge.

Later, Chase's father approached persons whom he felt were surveilling him. They revealed that they were FBI agents and told him that Chase was a "stooge" of the SWP and was being "forced" by SWP to typeset campaign materials in his (the father's) office.

(23) In March of 1971, in New York, New York, two FBI agents visited Susan Christie's apartment superintendent at 984 Sheridan Avenue, (Bronx), and questioned him and his wife about Christie.

(24) In May 1971, in Chicago, Illinois, FBI personnel visited the employer of Polly Connolly and she was fired as a result. In July of 1971 an FBI agent called the father of her new employer and asked if he knew Connolly was working for his son.

(25) In the Summer of 1971, in Kansas City, Missouri, FBI personnel telephoned John Constant and attempted to interrogate him.

(26) In the Spring of 1969, in San Francisco, California, FBI personnel visited Melanie Cresci at her family home and questioned her about the SWP. Her parents were aliens desiring citizenship and were frightened by the apparent government disapproval of their daughter's political affiliations.

(27) In May of 1973, in Seattle, Washington, FBI personnel visited John Cotman and attempted to interrogate him.

(28) On October 20, 1972, in Detroit, Michigan, two FBI agents visited Bruce and Jo Dallas at home and questioned them about their political views and the SWP. This visit was prompted by Bruce Dallas' recent attendance at two public forums sponsored by SWP at Campaign headquarters.

(29) In 1964 or 1965, in New York, New York, an FBI agent telephoned Steve Dash and asked to meet him in Central Park to discuss political activity.

(30) In late 1970 or early 1971, in Atlanta, Georgia, two FBI agents visited Steve Dash's apartment and attempted to interrogate him.

(31) In February 1973, in Atlanta, Georgia, two FBI agents came to Steve Dash's apartment at 8:00 A.M. and asked to see his roommate, Allan Mellman.

(32) On May 21, 1973, in Seattle, Washington, FBI Agent Cliff Spingler visited John Deeter's apartment and left a note: "John Deeter/please call/Cliff Spingler/Seattle FBI/MA 2-0460." Deeter called as requested. Agent Spingler said that it was his duty to investigate groups advocating the violent overthrow of the government. He said that SWP and YSA were such groups and tried to interrogate Deeter about them.

(33) In early 1973, in Los Angeles, California, an FBI agent telephoned Lucio DeLeon at his place of employment and made

an appointment for a meeting nearby. The agent met with DeLeon and interrogated him about the SWP. He offered to pay DeLeon to inform on SWP.

(34) In February of 1973, in San Diego, California, FBI Agent Ryans visited Jo-Ann Della Guistina's landlord and asked her questions about Della Guistina and about Lori Adolewski. On May 30, 1973, Agent Ryans returned and asked the landlord's daughter if Della Guistina and Adolewski still lived there. Agent Ryans returned a few days later and questioned the landlady. In June of 1973, an FBI agent telephoned the landlady and told her that Della Guistina was a communist.

(35) In the Summer of 1971, in Ann Arbor, Michigan, FBI Agent(s) visited Maceo Dixon's parole officer in the 22nd Judicial Circuit of Michigan and questioned him about Dixon's political activities.

(36) In January 1973, in Columbus, Ohio, two FBI agents (one named Robert Mohler) visited Daryl Drobnic's parents and asked them about Drobnic. Later on the same day, they returned and questioned Drobnic about his politics and personal life.

(37) In 1972, in Denver, Colorado, FBI personnel visited Don Rymph, landlord of Daniel De Witt, Don Treese and Peter J. Verner, and questioned Rymph about them.

(38) On May 16, 1973, in Denver, Colorado, an FBI agent telephoned Anne Durrance, new landlord of the building where DeWitt, Treese and Verner lived, and questioned her about their personal and political activity. He told her they were in the SWP and that the FBI therefore considered them capable of "violent political activity."

(39) In February or March of 1973, in San Antonio, Texas, FBI personnel visited Lark Eannance and questioned her about SWP and YSA.

(40) In September 1970, in Hartford, Connecticut, two FBI agents visited Randy Erb's place of employment, Miller Co., and asked to see him. They made an appointment to visit Erb at home the following morning at 9:00 A.M. They visited his home and interrogated him about the politics of YSA. They said YSA and SWP were subversive organizations and were a threat to the "internal security" of the United States. They told him that continued association with YSA and SWP would be harmful to him and suggested he join the Socialist Party instead. They inquired about his family and their politics. They asked him for names of all YSA members in Connecticut.

(41) In 1971, in Winsor Locks, Connecticut, FBI personnel visited Randy Erb's employer, Choice-Vend, and stated that Erb was in the SWP. They sought to interview Erb but were prevented from doing so by a union shop steward at the job.

(42) On January 8, 1973, in Atlanta, Georgia, at 6:30 A.M. two FBI agents visited Tom Fiske's apartment at 901 Juniper Street. They questioned Fiske about the YSA and SWP. They said they would soon contact Fiske again for further questioning.

(43) In early July 1972, in Detroit, Michigan, Kirk Fowler received a message at his place of employment, the Holden Office of Michigan Social Services, to call Bill Jones at 965-2373. He called the number and a voice answered "FBI." He asked for Bill Jones and was connected with a person who questioned him about the SWP and its politics.

(44) In April or May of 1973, in Philadelphia, Pennsylvania, two FBI agents visited the former apartment of Ed Fruit, and interrogated his roommate, Barry Meister, about Fruit.

(45) In 1969 or 1970, in Cleveland, Ohio, FBI personnel visited the employer of Marcia Gallo, East Cleveland High School, and described her political activities and beliefs to her supervisor. The supervisor attempted to induce the principal, Mr. Fanti, to dismiss Gallo. Fanti declined to dismiss her but suggested to the other teachers that they avoid her. Fanti told Gallo that FBI agents regularly talked to Gallo's supervisors about her.

(46) During 1973, in Danvers, Massachusetts, FBI agents visited many people employed by the St. Johns Preparatory School where Craig Gannon's father was headmaster, and of which Gannon was an alumnus, to ask questions about Gannon.

(47) In December 1972, in Detroit, Michigan, FBI personnel interrogated Lisa Gleischer about her association with YSA. They also interrogated her parents' neighbors about her.

(48) On February 26-7, 1974, in Indianapolis, Indiana, FBI personnel telephoned John Goldberg and questioned him about SWP and YSA members in Indianapolis and Bloomington, Indiana.

(49) In November, 1972, one week before the YSA National Convention in Cleveland, Ohio, FBI personnel visited Dwight Knapp, manager of the Sheraton-Cleveland Hotel where the 1972 convention was scheduled to be held. The agents attempted to induce Knapp to disclose financial records relating to YSA. They told Knapp that YSA was a dangerous organization and that FBI agents would be assigned to monitor the convention.

(50) In the Spring of 1973, in Columbus, Ohio, FBI personnel visited Lyle Gordon and interrogated him about YSA and SWP.

(51) In 1973, in Oakland, California, FBI personnel visited the manager of the apartment building at 3302 Telegraph Avenue, and questioned her about her tenants, Alan Grady and Linda Somes.

(52) In the Spring of 1972, in Detroit, Michigan, two FBI agents visited Bill Gretter and questioned him about SWP, YSA, and his own political views and financial affairs. They questioned him about Barry Sell.

(53) In May of 1970, in Denver, Colorado, FBI personnel (a) visited the former roommates of Gary Guy at 504 Pearl Street and questioned them about Guy and his affiliation with the SWP; (b) visited Guy's parents and their neighbors and interrogated them about Guy; (c) visited Guy's apartment

building at 1635 Downing Street, and questioned neighbors about Guy's politics and his relationship with Karen Kordish who shared an apartment with him; (d) visited Karen Kordish and questioned her about Guy.

(54) In the Summer of 1972, in Vietnam, agents of the United States Army Criminal Investigation Division, interrogated Gary Guy's sister, an army nurse, about her brother. They characterized Guy as a "registered Socialist" and questioned her about her private correspondence with him.

(55) In February of 1973, in Denver, Colorado, FBI personnel visited the manager of Gary Guy's apartment at 1518 St. Paul Street, and questioned him about Guy.

(56) In August 1971, in New York, New York, persons identifying themselves as "Justice Department" agents made two visits to the home of the parents of Reuben Montare and questioned them about Montare's friend, Joe Harris.

(57) In the Spring of 1972, in New York, New York, FBI personnel visited the landlord of Joe Harris' father at 1018 East 212th Street, and questioned him about Harris. Later, two agents (one named James David) visited Harris' father, Edward Harris, Jr., at 1018 East 212th Street, and interrogated him about Joe.

(58) On May 30, 1973, in Denver, Colorado, two FBI agents came to Marie E. Head's apartment and questioned her about SWP and YSA and her political activities.

(59) In April of 1973, in Jamestown, New York, Kurt Hill received a call from Resident Agent Engel who sought to question Hill about his political activity in support of the SWP's 1972 presidential campaign.

(60) On two occasions, in May of 1971, in Utica, New York, two FBI agents visited Stephen Horne and interrogated him about Steve Wattenmaker and Kathleen Fitzgerald, Horne's wife. The agents asked Horne to join the YSA and become an informant for the FBI.

(61) In the Summer of 1971, in Kansas City, Missouri, FBI personnel visited the construction job-site where Johnnie L. Combs was employed as an electrician and interrogated him about John Isenhower, his roommate. Later, Isenhower called the FBI office in Kansas City and complained about the incident. The agents promised Isenhower he would be "rewarded" if he cooperated with the FBI.

(62) On April 26, 1973, in Philadelphia, Pa., FBI agents Warner and Harris visited Samara Jarosh at home and questioned her about the SWP and YSA. They said the SWP advocates "new ideas of a violent nature." They requested a list of members and local leaders. They threatened to tell her parents about her membership, and said they "would hate to have to embarrass her at work." They told her they would return.

(63) In December of 1972, in New York, New York, FBI personnel visited the landlord of Elizabeth Jayko, Judy Kleinburg,

and Nancy Rosenstock, at 225 East 28th Street, and questioned him about them.

(64) In the Winter of 1973, in St. Louis, Missouri, FBI personnel visited Elizabeth Jayko's employer. After this visit the employer instructed Jayko's co-workers to avoid her. Jayko was soon dismissed.

(65) In the Fall of 1970, in Tampa, Florida, FBI agents Batley and O'Flarity visited Chip Jeffries, and questioned him about the YSA and his association with it.

(66) In the Fall of 1973, in New York, New York, FBI personnel visited Linda Jenness's landlord, Bernard Lipschutz, at 237 East 5th Street. They told him that she had run for President of the United States on the SWP ticket. They gave Lipschutz the impression that Jenness's activity was illegal and that he did not have to rent to people like her.

(67) In February of 1973, in Los Angeles, California, two FBI agents stopped Claire Jones, a postman, on his rounds and interrogated him about the SWP and YSA.

(68) In early April 1971, in Seattle, Washington, FBI agent Mathis called Bill Jungers at 8:05 a.m. and attempted to set up a meeting.

(69) Through 1971, in Chillicothe, Ohio, FBI agents visited Joseph P. Kear's father at 978 Simon Lane, and questioned him about his son.

(70) In January 1973, in Chillicothe, Ohio, FBI personnel visited Joseph P. Kear's aunt and uncle at Fruit Hill Drive, and questioned them about their nephew.

(71) In May of 1971, in Oakland, California, FBI personnel visited Jim Kendrick's apartment at 456 Rich Street, and questioned the baby-sitter about Kendrick's wife's political beliefs and activity.

(72) In September of 1970, in Tampa, Florida, FBI Agents Batley and O'Flarity visited Cappy Kidd and questioned him about the YSA and about Frank Lord.

(73) In October, 1972, in Douglasville, Georgia, FBI personnel visited Barbara Kiene's employer, the Gartford Insurance Group, and left a message for Kiene to call Agent Charlie Fullam at the FBI office. Kiene called Agent Fullam. He questioned her extensively about the YSA, its activities and its activities and its members. The FBI also visited Kiene's parents and told them that her YSA activities were a "threat to the United States government." Her parents ordered her to quit the YSA and forbade her to visit the Atlanta headquarters of the SWP and YSA. She resigned the YSA in November of 1972. In December of 1972, FBI Agent Fullam called Kiene at her new apartment and asked her again for information on YSA members and for YSA literature.

(74) On February 1, 1973, in Detroit, Michigan, two FBI agents (one named Bill Jones) visited Sandy Knowles'

apartment and questioned her roommate, Steve Beren, about her.

(75) In 1968, in Phoenix, Arizona, FBI personnel interrogated neighbors about Paul Lenow, SWP Presidential Elector for Arizona.

(76) In June of 1973, in Mt. Vernon, New York, FBI personnel visited neighbors of Marc Lichtman's father and questioned them about Lichtman. In the same month, an FBI agent called a neighbor of Marc Lichtman's mother and questioned her about Lichtman.

(77) In 1971, in Lynn, Massachusetts, FBI personnel visited Stanley Lipman's employer, Murphy Plumbing Co., and asked if they knew that they had a communist working for them, naming Lipman. The agent then questioned the employer about Lipman.

(78) In 1968, in New York City, two FBI agents visited Arthur Maglin's neighbor and asked questions about Maglin.

(79) On October 27, 1972, in Detroit, Michigan, two FBI agents visited Robin Maisel's apartment and left a message for Maisel to call Special Agent Bill Jones at 965-2373, Ext. 358. Maisel called and Agent Jones questioned him about the SWP and his relationship to it.

(80) In 1972, in Oakland, California, F I personnel visited the office of Nancy Makler's landlord, Ansil Realty, 4432 Piedmont Avenue, and asked questions about the politics and life style of Makler and her roommates, all YSA members. The agents told the landlord that Makler and her roommates were subversives.

(81) In June of 1971, in Denver, Colorado, two FBI agents (one named Clapp) visited John T. Maley and questioned him about his political activity. FBI agents also visited Maley's employer and asked questions about him.

(82) In March of 1972, in Lubbock, Texas, FBI personnel visited officials of the Wesley Foundation where YSA held its meetings and persuaded them to bar future YSA meetings because of YSA members' political beliefs and activity.

(83) In June of 1970, in Tampa, Florida, FBI agents Batly and O'Flarity visited and questioned Becky McKinna at her place of employment.

(84) In January of 1970, in Logan, Utah, FBI personnel visited Stern McMullen's employer, Utah State University. The agents questioned Claude Burtenshaw, Dean of Students, about McMullen and said that McMullen was dangerous and a subversive. In November 1970, FBI agents visited Judd Harmon, Dean of the Social Sciences and Humanities, and interrogated him about McMullen.

(85) In June of 1970, in Oakland, California, FBI personnel visited Cyrus Tollefson and asked him questions about Linda McMullen and her husband Stern. They also inquired about the McMullens' fathers.

(86) In the summer of 1973, in Morristown, New Jersey, FBI Agent Devlin visited Deborah Meldrin's home and questioned a friend about Meldrin and her husband Howard Meldrin. Agent Devlin left his number for the Meldrins to call. Deborah Meldrin called the number and Agent Devlin questioned her about her political activity and that of her husband.

(87) In March of 1974, in Morristown, New Jersey, two FBI Agents (one named Koslap) approached a security guard at the bank where Deborah Meldrin works and questioned him about her.

(88) On March 12, 1974, two FBI agents (one named Koslap) visited Deborah Meldrin at home. They asked her for a photograph of her estranged husband, Howard, and questioned her about his activities in New York City where he then resided. The agents told her that they had found out much about her past and were keeping her and Howard under surveillance.

(89) In the fall of 1971, in Miami, Florida, FBI Agent Marvin Lewis of Boston, a relative of Allan J. Mellman, came from Boston and attempted to persuade Mellman to quit the YSA. He told Mellman that the YSA was under surveillance and that all SWP and YSA members including Mellman were surveilled.

(90) In late 1972, in Hughson, California, two FBI agents visited a former employer of Ross G. Nicholas, and asked questions about Nicholas. Two FBI agents visited Nicholas' wife and questioned her about Nicholas. Two FBI agents visited Nicholas and questioned him extensively about the YSA, SWP, members of both organizations and Nicholas' own activity. The agents told Nicholas that the SWP was on the Attorney General's list of subversive organizations and that consequently Nicholas' name was on a government subversive list. They told him that the SWP was controlled from a foreign country. They showed Nicholas a large file and told him that it was his FBI dossier.

(91) On March 7, 1973, in Detroit, Michigan, an FBI agent telephoned Jane Osterberg's mother and left a note for Osterberg to call Agent Bill Jones of the FBI. Osterberg called and Agent Jones told her SWP was subversive and questioned her about the SWP and a number of SWP members including Mike Melin.

(92) In April of 1973, in Philadelphia, Pennsylvania, FBI personnel visited Jo Otero's apartment and left a note saying, "Miss Otero/Call Agent Warner, FBI/LO3-5300 after 5:00 P.M." On May 2, 1973, Agent Warner rang Otero's apartment bell, came to her door and attempted to interrogate her about the SWP and YSA.

(93) On March 29, 1973, in Mendham, New Jersey, FBI Agent Devlin visited the Principal of Lori Paton's high school, the Police Chief of Chester, New Jersey, and a local credit agency, and questioned them about Paton's political affiliations. These visits were prompted by Paton sending a letter to the National Office of SWP in New York City for the purpose of requesting political information.

(94) In the fall of 1972, in San Rafael, California, FBI personnel visited Ron Payne's employer, Programming Products, Inc., and asked questions about Payne.

(95) On March 26, 1973, in Detroit, Michigan, two FBI agents (one named Bill Jones) visited Arturo Ramirez's wife, Margot Ramirez, and questioned her about his political activity. She refused to answer their questions, whereupon they threatened her by claiming that they knew of unspecified "problems" she was having with the law. They asked her to call 965-2373, ext. 358, if she should change her mind about talking.

(96) On May 24, 1973, in Denver, Colorado, two FBI agents visited Marilyn Rashkind's apartment and questioned her about Marie Head.

(97) In the summer of 1970, in La Marque, Texas, FBI agents visited Steve Raulerson's parents and questioned them about his political views.

(98) During 1967, in New York, New York, FBI personnel periodically visited Wendy Reissner's former landlord, P. Oberstein, at 430 West 46th Street, after she and her husband Will Reissner moved to Seattle.

The Reissners moved back to New York in 1970 and attempted to rent from Mr. Oberstein, but he refused for fear of further FBI harassment.

(99) From 1964 to 1967, in New York, New York, FBI agents visited Will Reissner's employer, the Royal Globe Insurance Co., at six month intervals and asked questions about his political activity.

(100) In April of 1969, in San Diego, California, Marc Rich's father, a naval officer, was informed by his superiors that Marc Rich was reportedly in the YSA. The father said he would evict Rich unless he quit the YSA.

(101) In October of 1972, in San Diego, California, FBI personnel visited Marc Rich's employer, A-1 Bindery, and told Rich's boss, Pete Randall, that Rich was in SWP and that the FBI did not like members of the SWP working in companies that had government contracts. Consequently, the employer told Rich he would be fired if he talked to his fellow workmen about his socialist ideas.

(102) In April, 1973, in San Diego, California, FBI personnel visited Marc Rich's employer, Great Western Printing Co., and questioned Rich's supervisor's secretary about him. They told the secretary "to check voter registration" if the supervisor wanted to know why Rich was being investigated. Rich's supervisor telephoned the San Diego election records office and was told that Rich was affiliated with SWP. At the time Rich was a candidate for shop steward in elections soon to be held. The supervisor told a union official that the union should prevent Rich from being a shop steward because he was "a communist being pursued by the FBI."

(103) On November 22, 1972, in Ann Arbor, Michigan, FBI agent Gene Ward visited Dave Richmond's apartment and left a note for Richmond to call Agent Ward at 662-2597. Richmond called and Agent Ward questioned him about the YSA.

(104) On November 28, 1972, in San Diego, California, FBI personnel visited the aunt and uncle of Jana A. Roten with whom she had previously lived and questioned them about her.

(105) On November 10, 1972, in Ann Arbor, Michigan, FBI personnel visited David Ruhland's apartment and questioned his roommate about him. They left a message for Ruhland to call Gene Ward of the FBI at 662-2597. Ruhland called and Agent Ward questioned him about his association with the SWP.

(106) On June 21, 1973, in Austin, Texas, FBI agents Holmes and Riley visited George Saad's apartment and questioned him about SWP and YSA.

(107) In early 1970, in Shaker Heights, Ohio, FBI personnel visited the principal of Woodbury Junior High School, where William Saks was a 9th grade student. They questioned the principal about Saks and told him that Saks had attended the YSA national convention in Minneapolis in December of 1969 and that Saks was a "revolutionary."

(108) In September of 1971, in Detroit, Michigan, an FBI agent called Joseph Saunders and asked for information about the SWP.

(109) In April of 1973, in Philadelphia, Pennsylvania, two FBI agents visited Joseph Saunders' apartment and asked for his roommate, a member of the SWP, who was not at home. The agents left, saying to Saunders, "We know who you are."

(110) In the late 1960's, in Berkeley, California, FBI personnel visited one of Jean Savage's college roommates and asked questions about Savage.

(111) In May 1973, in Philadelphia, Pennsylvania, two FBI agents visited Jean Savage's apartment and questioned her about Jean Fargo.

(112) On November 14, 1973, in Bloomington, Indiana, an FBI agent with the first name of Tom visited Marc Schulz's place of employment. He told Schulz that the YSA was "dominated" by the SWP and was therefore a Communist or Communist-sympathizing organization and asked Schulz questions about YSA and SWP.

(113) In the summer of 1970, in Washington, D.C., two FBI agents visited Margaret Scott's grandmother's house, where Scott was staying, and questioned Scott about SWP and YSA. The agents said that they were protecting "national security."

(114) From August 1970 to January 1972, in Austin, Texas, FBI agents visited the Executive Director and two assistant directors at Evelyn Sell's employer, the Human Opportunities Corporation of Austin, Texas. The agents questioned Sell's superiors about her and informed them that Sell had run for public office as an SWP candidate in 1958.

(115) In February or March 1973, in Columbus, Ohio, FBI agents visited Sam Shannon's parents and questioned them about him.

(116) In 1969, in Boston, Massachusetts, an FBI agent phoned the employer of Roger Sheppard and asked questions about him.

(117) In the summer of 1972, in Oakland, California, FBI agents visited the manager of Caryl Sholin's apartment. They asked questions about Sholin and her roommate, and told the manager that both were members of a "Communist organization" and that Sholin worked for a bookstore which sold "communist books."

(118) In early 1972, in New Orleans, Louisiana, FBI personnel visited David Shroyer's neighbors and questioned them about his political beliefs and activity.

(119) On May 1, 1973, in Philadelphia, Pennsylvania, two FBI agents (one named Charles Warner) visited a neighbor of Bob Stanton and asked questions about him.

(120) In January 1973, and again in the spring of 1973, in Columbus, Ohio, an FBI agent visited Nancy Stemmer and questioned her about the YSA and her related activities in Columbus. He also questioned her about Julie Bingham and Shirley Pasholk.

(121) On June 21, 1973, in Austin, Texas, FBI agents Riley and Holmes visited Richard Stewart. Stewart was wearing a T-Shirt imprinted "Vote Socialist Workers." The agents questioned him about the SWP and taunted him about his T-Shirt.

(122) In May of 1973, in Cincinnati, Ohio, FBI personnel visited the security officer of Walnut Hills High School and asked who had arranged a speaking engagement for plaintiff Andrew Pulley at the School. The agent offered to place a "tail" on the person who had arranged the meeting.

(123) In May of 1972, in Los Angeles, California, FBI personnel visited three neighbors of Bruce Tapper and questioned them about his morals and political views. FBI personnel also visited Milt Wolpin, the professoral chairman of Tapper's graduate committee at the University of Southern California, and questioned him about Tapper. FBI personnel also visited Tapper's employer, the Veterans Administration Hospital, and questioned Tapper's supervisor about Tapper's loyalty.

(124) On May 15, 1973, in Seattle, Washington, two FBI agents visited Joanne Thomas at her family home and questioned her about the YSA and her association with it.

(125) In mid-March of 1973, in Detroit, Michigan, FBI Agent Clyde Merriman visited Jackie Toney's place of employment. He posed as a friend of Toney's in order to gain access to her and then questioned her about YSA.

(126) In mid-August of 1972, in San Diego, California, FBI agent Green telephoned Page Tulloch and attempted to set up a meeting to discuss YSA. Tulloch did not agree to the meeting. Green then told Tulloch that the FBI was "concerned" about his activity but that the FBI did not want to resort to measures that would harm Tulloch. Green said such measures would include talking to Tulloch's parents, employer, friends, neighbors, and unspecified

"other things." Green said the FBI "had pictures" and that it was against the law to "conspire against the United States Government." Finally, Tulloch agreed to meet with Green but later cancelled the appointment.

In September of 1972, Green called Tulloch's mother and told her that he did not want to do anything to hurt Tulloch and would not need to, if Tulloch would cooperate. Later in September, Green called Tulloch's mother a second time and told her that he was "very disappointed" that Tulloch had not cooperated. Green said that he would be "forced" to inform Tulloch's employer that he was a Socialist. He said the FBI had become "quite concerned" because Tulloch was "moving up in the party."

In December 1972, in Philadelphia, Pennsylvania, FBI personnel visited Tulloch's sister and brother-in-law and questioned them about Tulloch. The agent stated that the inquiry resulted from Tulloch's SWP affiliation.

(127) In the summer of 1972, in Detroit, Michigan, FBI agent Bill Jones, visited Don Upton's apartment at 127 Seward, and left a note for him to call Bill Jones at 965-2373, ext. 538.

(128) In 1973, in Louisville, Kentucky, an FBI agent called Gary Valenza's landlord and questioned him about Valenza. The agent said his investigation was for "national security."

(129) In October of 1972, in Long Beach, California, FBI personnel visited John Van Lewan's employer, Longbeach Aircraft Co., and told the employer that Van Lewan was in the SWP.

(130) In 1971 or 1972, in San Francisco, California, FBI personnel visited the caretaker of Joe Vass's apartment and questioned him about Vass and his wife Susan Vass. The agents showed the caretaker photographs of the Vasses which had been taken in 1970 by a government informant in Minneapolis.

(131) In August of 1972, in Detroit, Michigan, FBI personnel visited a former employer of Plaintiff Christy Wallace, International Multifoods, and interrogated them about Wallace who was then running for public office as a candidate of the SWP.

On August 29, 1972, Agent Bill Jones and another FBI agent visited Wallace at her place of employment, Hagemeyer Enterprises, 929 Penobscot Building, and questioned her.

(132) In November of 1969, in Carmel, California, an FBI agent visited Joe Ward and his family at home. He tried to persuade Ward to drop out of the YSA. He told Ward and his parents that YSA was a "Trotskyite Communist" organization that was attempting "to use" Ward for "its own ends." He said that Ward's father, Joe Ward, Sr., would lose his job if Ward remained in the YSA.

(133) In August of 1973, in Oakland, California, FBI personnel visited the neighbors and the employer of Joe Ward, Sr., father of Joe Ward, and falsely told them that Joe Ward, Sr., was a "Trotskyite Communist" and member of the SWP.

(134) In the fall of 1970, in Utica, New York, FBI personnel visited Steve Wattenmaker's employer, Paul Baker, and

Wattenmaker's friend, Jay Hagenbuck, and questioned them about Wattenmaker's politics and character.

(135) During October of 1973, in Boerne, Texas, FBI agents visited Ed Weaver and attempted to question him.

(136) In May of 1973, in Seattle, Washington, FBI personnel visited Harriet Weinhold's apartment and left the following note: "Harriet or Wes Weinhold/Please Call/Clifford M. Spingler/Seattle FBI/MA 2-0460." The Weinholds' attorney, Mike Withey, called Agent Spingler. Spingler said the basis of his inquiry was that SWP and YSA were putting out literature which called for the violent overthrow of the government.

(137) During or about 1972, in Cleveland, Ohio, FBI personnel visited Marcia Wheeler, at her place of employment at Metropolitan General Hospital, and questioned her about YSA and SWP. They threatened her with loss of her job if she remained in the YSA and referred to potential hardship for her four year old daughter if Wheeler became unemployed. Shortly thereafter Wheeler resigned from the YSA.

(138) In September of 1970, in Tampa, Florida, FBI Agents Batley and O'Flarity visited Helen Whitcraft at work and questioned her about the SWP and YSA. A few days later they returned and attempted to talk to Whitcraft's employer about her politics.

(139) In the spring of 1969, in Berkeley, California, FBI personnel visited Betsy Whittaker's former landlady, Ellen Drurie, and questioned her about Whittaker's personality, job, friends, character, and political activity. They told Drurie that their inquiry was based on Whittaker's YSA affiliation.

(140) In August of 1971, in Detroit, Michigan, three FBI agents (including Jack Lowie) visited Steve Williams, a truck driver, and questioned him about SWP and YSA. They asked him to cooperate with them. They said they knew of several traffic violations which, if reported, could result in revocation of his driving license. They said they knew that Williams aspired to become a lawyer and that the FBI would be able to help him do so if he would cooperate with them. This offer was repeated in the Fall of 1972.

(141) In June of 1973, in Austin, Texas, FBI personnel (including Agent Jack King) visited Wendy Wisenberg's landlady, Loraine Thrasher, and questioned her about Wisenberg. They also visited a former neighbor of Wisenberg's and asked questions about her. On June 13, 1973, FBI Agents King and Holmes visited Wisenberg at her residence, 601 W. 19th Street, #B, and interrogated her about SWP.

(142) In summer of 1971, in Kansas City, Missouri, FBI agents visited Raleigh Woods and questioned him about the YSA.

(143) On November 11, 1972, in San Diego, California, FBI personnel visited Matilde Zimmerman's employer, L'Mer Engineering, and "warned" about Zimmerman's activities. At about the same time, Zimmerman was discharged without reason over the objections of her immediate supervisors.

(144) On February 23, 1974, in Detroit, Michigan, federal agents visited Craig Haponovich's place of employment, the Fenkell Post Office, and questioned his supervisor, Mr. Pegram, about Haponovich.

(145) In the summer of 1973, in Carbondale, Illinois, an FBI agent called Matthew Meighan and questioned him about the YSA and his activities with it.

(146) In the summer of 1970, in Washington, D.C., an FBI agent from Dallas, Texas, visited Ann Springer's father, then a member of Congress, and told him that Springer was in the YSA and SWP.

42. See answer to No. 41, in particular, items (2), (7), (12), (15), (22), (33), (40), (60), (61), (62), (73), (89), (90), (95), (121), (126), (132), (137), (140).

43(a) and (b). See answer to No. 41, in particular, items (1), (3), (5), (6), (9), (10), (11), (13), (14), (17), (19), (20), (22), (23), (24), (26), (34), (35), (37), (38), (41), (45), (46), (51), (53), (54), (55), (56), (57), (63), (64), (66), (71), (73), (75), (76), (77), (78), (80), (81), (84), (87), (94), (98), (99), (100), (101), (107), (114), (116), (117), (118), (119), (123), (126), (128), (129), (131), (132), (134), (138), (139), (141), (143), (144), (146).

43(c). In some cases the purpose was admitted. For example, see answer to No. 41, items (66), (73), (84), (101), (107), (132), (143). In addition, the fact that the threats and disclosure had the effect of provoking hostility and discrimination over a period of many years led plaintiffs to believe that this effect was intended. Finally, the defendant FBI director has admitted to operation of a "Socialist Workers Party Disruption Program" designed to disrupt plaintiffs' activities in part by cultivating public opposition.

44(a). SWP and YSA have never been subjected to acts like those complained of in this case by any of the organizations named except for the Legion of Justice.

44(b). On November 1, 1969, approximately twelve masked members of the Legion of Justice entered the SWP and YSA headquarters at 302 S. Canal in Chicago, Illinois. Using weapons, they subdued four occupants of the office and stole a cash box and a quantity of papers and literature. Some of the stolen papers were later conveyed to Military Intelligence Officer Thomas L. Filkins at a secret meeting in the office of S. Thomas Sutton, a Legion leader.

44(c). One basis is that defendants announced and operated a nation-wide "Socialist Workers Party Disruption Program." No private organization has adopted a similar program, nor would any private organization have the capacity to operate such a program. Another basis is defendants' admission that it operated a mail cover on the national office of the Socialist Workers Party in 1973. As to interrogation by purported FBI agents, plaintiffs have no reason to believe that any of the other organizations attempt to pose as federal agents. Insofar as any of the activities complained of were carried out by the Legion of Justice or other

private, state or local groups acting in concert with defendants, defendants are responsible to the same degree as if federal agents had performed the acts themselves.

45(a). There follows a partial list of persons who were singled out as alleged in paragraphs 46-52 of the complaint, together with action taken and its date. Paragraph 53 also refers to the persons listed in response to No. 41. Insofar as No. 45(a) seeks current addresses of the persons listed below, plaintiffs object on the ground stated under No. 1(d).

A. Federal Employees Discharged or Harrassed by Bureau of Personnel Investigations of the Civil Service Commission Because They Supported or Belonged to SWP and/or YSA.

(1) Kenneth Evenhuis: Ordered discharged and barred from government employment, December 3, 1970.

(2) Duncan Gordon: Ordered discharged and barred from government employment, March 18, 1969.

(3) Alan R. Green: Ordered to comment on and explain association with YSA, 1971.

(4) Emily Homonoff: Ordered to comment on and explain support of SWP and its 1972 election campaign and candidates, September 12, 1972.

(5) Lawrence Hyink: Ordered to comment on and explain association with SWP, December 5, 1973.

(7) Sally Lemley Moore: Ordered discharged and barred from government employment, 1968.

(8) Alice Woznack: Ordered discharged and barred from government employment, March 6, 1973.

(9) Virginia Lee Zola: Ordered to comment on and explain association with SWP, September 2, 1969.

B. Persons Discharged by the U.S. Army With Less Than Honorable Discharge Because They Supported or Belonged to SWP and/or YSA

1. James Burfeind - March, 1971.
2. Gary Cohen - 1961.
3. Steve Dash - 1969
4. Duncan Ward Kennedy - January 21, 1972.
5. John Allen Myers - 1969
6. John Singleterry - October 5, 1971

C. Selective Service Registrants Who Were Declared by the U.S. Army to be Unfit for Military Service Because They Supported or Belonged to SWP and/or YSA. (Asterisk (*) denotes persons known to have been classified by the Selective Service System as unfit for military service pursuant to the Army's determination).

1. Meyer Alewitz - July 27, 1973.
2. David Bliss - February 15, 1972.
3. Stephen Bloom - February 18, 1972.
4. Robert Mark Brenner - May 9, 1972.
5. John Travis Burgeson - March 15, 1972.
6. Carl Finnamore - June 15, 1971.
- *7. Richard Geyer - November, 1970.
8. Robert David Gooler - August 31, 1971.
9. Duncan Gordon - June 23, 1971.
10. William L. Grettor - April 10, 1972.
11. Gregory V. Guckenbug - November 2, 1971.
12. William Sherman Hutton - September 2, 1971.
13. James Curtis Jeffries - January 20, 1972.
14. Dave Jerome - March, 1972.
15. Richard S. Lesnik - May 20, 1971.
16. Mark Lobato - July 11, 1972.
17. Samuel William Manuel - October 5, 1971.
18. Robert Collins - May 2, 1966.
19. Tom O'Brian - February 14, 1972.
20. Ted Parsons - August, 1972 (?)
21. Lew Pepper - June, 1970 (Spring, 1972?)
- *22. John E. Powers - 1968.
- *23. Dennis Richter - February 8, 1972.
- *24. Joseph Saunders - 1969.
25. Paul Richard Schneidtlein - June 4, 1971.
26. Barry Sell - January 11, 1972.
27. Lee Warren Smith - May 20, 1971 (June 10, 1971).
28. Jon Michael Teitelbaum - July 20, 1971.
29. Tom Tomasko - November 9, 1972.
30. Joseph Henri Traugott - November 2, 1971.
31. John Votava - June 2, 1971.
32. Joe Ward - June 11, 1971
33. David Welters - February 10, 1972.
34. Mark Zola - June 11, 1971.

45(b). The names and positions are unknown to the plaintiffs.

45(c). See answer to No. 45(a).

45(d). See answer to No. 45(a).

45(e). No.

45(f). The basis of this allegation (which is contained in paragraph 53 of the complaint and refers to the incidents described in answer to No. 41 as well as in answers to subdivisions (a) to (e) of No. 45) is the government's acknowledgment of such a purpose through a variety of acts and statements over the years: for example, the promulgation of the Attorney General's List branding the SWP as "subversive," the creation of the Socialist Workers Party Disruption Program, and an article by FBI Director Hoover in the September 1970 issue of V.F.W. magazine. In addition, the widespread, coordinated nature of the government assault on plaintiffs gives rise to an inference that it was and is purposeful.

45(g). Plaintiffs claim that all individuals named in response to Nos. 41 and 45(a) have been harassed and intimidated. All plaintiffs claim that their ability to attract other supporters and to participate effectively in the electoral process has been impaired. The specific circumstances of harassment, intimidation

and impairment are described in answers to Nos. 41 and 45.

45(h). Plaintiffs object to the Interrogatory as overbroad and unreasonably burdensome in that it apparently requests plaintiffs to locate in their files and list every scrap of paper known to them which pertains in any way to any of the approximately 200 incidents listed in response to Nos. 41 and 45. Plaintiffs further object to the Interrogatory insofar as it refers to materials developed in preparation for this litigation.

46(a). Emily Rose Homonoff is a member of plaintiffs' class in her capacity as a member of SWP.

46(b). Plaintiffs object on the grounds stated under No. 1(d).

46(b). Plaintiffs object on the grounds stated under No. 1(d).

46(c). No.

47(a): Address: 8316 14th Avenue, Apartment 301, Hyattsville, Maryland. Employment: Vionetics Company, Hyattsville.

47(b): Plaintiff Alice P. Woznack was removed from a position as a federal employee. The reasons for her removal are best known to defendants, but plaintiff's position is that she was removed because of her affiliation with the Socialist Workers Party.

48: On or about June 15, 1971, U.S. Parole Officer Jesse Clark told plaintiff Yow that if the Washington Parole Board were informed of his politics that he could be recommitted for being a "menace to the Community."

49(a): The name and address of the repair man is unknown to plaintiffs.

49(b): Yes.

49(b)(i): A report was made to the Pacific Bell Telephone Co. on February 23, 1972, and a report was made to the Los Angeles Police Department on March 1, 1972.

49(b)(ii): See answer to No. 49(b)(i).

49(b)(iii): The substance of the report was that there was a wiretap on the line.

49(b)(iv): The Telephone Company removed the wiretap. The Police Department visited the scene but apparently did nothing else.

50: The basis of the allegation is the government's habit and capability of installing such devices and its stated intention to do so. For example, the government has admitted that certain plaintiffs were wiretapped prior to 1963. It has admitted to the more recent utilization of "sensitive intelligence techniques" in connection with the Socialist Workers Party Disruption Program. The 1970 Huston Plan specifically called for the use of illegal electronic surveillance. The allegation is further based upon the fact that the technology of electronic surveillance has been

developed and controlled almost exclusively by defendants, and therefore any use of such technology gives rise to an inference of involvement by defendants.

51(a): The telephone number at the time was area code (213) NO 3-0002. The service was contracted for by Rose Karsner and the bills were paid by James P. Cannon.

51(b): This information is unknown to plaintiffs.

51(c): See answer to No. 50.

51(d): See answer to No. 51(b).

52(a): The basis of this allegation is defendants' practice and stated intention of making such interceptions (see answer to No. 50) as substantiated by the fortuitous discovery of the Cannon tap.

52(b) & (c): Plaintiffs believe that the intercepted communications were disclosed and/or used by defendants because the only conceivable purpose of intercepting the communications is to use or disclose them.

53: Except for the Cannon tap, plaintiffs have not chanced upon any of defendants' surveillance devices and hence cannot answer No. 53.

54(a): The letters were written on paper, sealed in paper envelopes, addressed to plaintiff Gordon, or other occupants of his apartment, and bore United States postage.

54(b): Plaintiff Gordon observed defendant Nogi with the letters in his hand.

54(c): The basis of the allegation is that the Army knew of plaintiff Gordon's political affiliations and there was no other reason for a military intelligence agent to be rifling his mail box.

54(d): Plaintiff Gordon was aware of such efforts. The reasons for such attempted contact are best known to defendants, but they were purportedly to conduct a security investigation.

55(a): These allegations are based on defendants' policy and intent as expressed in the Socialist Workers Party Disruption Program materials and in the Huston Plan.

55(b): The specific dates and locations have been well concealed by defendants and are therefore unknown to plaintiffs.

55(c): See answer to No. 55(b).

56(a): One such mail cover is admitted by defendants. This is the 1973 cover of mail addressed to the National Office of SWP in New York City. For details, see Postmaster General's Response to Interrogatories and his Response to Request for Production of Documents.

56(b): See answer to No. 56(a). Plaintiffs contend that other covers have existed, but defendants have so far concealed them successfully.

56(c): Plaintiffs first learned of the 1973 cover during or about July of 1973.

56(d): No. Plaintiffs deemed it futile to "report" the cover to the very agencies who deliberately installed it.

57(a): The Detroit burglaries occurred on or about October 31, 1971, in the evening. The precise dates and times are unknown. The New York burglary occurred during the evening of May 24, 1973, before 9:30 p.m.

57(b): In the Detroit and New York burglaries, the materials which were rifled or removed were files, mailing lists, telephone lists, correspondence, and similar materials relating to the political campaigns and other matters of the Socialist Workers Party and Young Socialist Alliance.

57(c): No other items were removed or damaged with the possible exception of a ring in the case of the New York burglary.

57(d): There are no known witnesses to any of the burglaries.

57(e): Plaintiffs object on the grounds stated under No. 1(d).

57(f): Plaintiffs object on the grounds stated under No. 1(d).

57(g): Plaintiffs object on the grounds stated under No. 1(d).

57(h): The burglary referred to in Paragraph 66 of the Complaint was reported to the Detroit Police Department on or about October 31, 1971. Plaintiffs do not recall who made the report. Two police officers appeared at the scene and took fingerprints. One of the officers stated that the FBI had performed the burglary. Plaintiffs know of no other action taken by the Police Department, except to consult with the FBI about it.

The burglary referred to in Paragraph 67 of the Complaint was also reported to the Detroit Police Department. It was not reported by plaintiff Bolduc himself, and neither plaintiff Bolduc nor any other plaintiff recalls who reported the burglary. The burglary was reported on the day of its discovery. Detroit Police Officers came and investigated at a time when plaintiff Bolduc was absent. They left a note for him to call them. Plaintiff Bolduc complied. Plaintiffs know of no other action taken by Detroit Police as a result of plaintiffs' report.

The burglary referred to in Paragraph 68 of the Complaint was not reported to any law enforcement authorities, for the reason that plaintiff Oliver lacked confidence in the willingness and/or ability of any such authority to apprehend the burglars.

57(i): The basis of the allegation is the long-standing practice and the stated intentions of the said government agencies and their superiors to engage in political intelligence burglaries of the type complained of. For example, see the Huston Plan and the Socialist Workers Party Disruption Program. Additional evidence of the government's propensity to engage in this type of activity is the well-known incident in which CIA-assisted Presidential aides carried out an intelligence-gathering burglary at

the office of Dr. Daniel Ellsberg's psychiatrist. President Nixon himself has admitted that burglaries are a staple federal investigatory technique. (San Clemente news conference during week of September 20, 1973.)

57(j): The basis of the allegation includes the fact that the theft of telephone lists in Detroit was followed by a systematic campaign of harassing telephone calls to persons listed on the list. The callers identified themselves as agents of the FBI. A further basis is the fact that a letter of Norma Jean Lodico was stolen in the Detroit headquarters burglary and later appeared in the possession of the Civil Service Commission. Additional basis for the allegation is provided by the mail cover incident involving Lori Paton, a high school student who sent a letter to the National Office of SWP in February 7, 1973. FBI agents obtained her name from the letter and used the information to harass Paton and, indirectly, plaintiffs.

58(a): The basis for the allegation is the United States' avowed intent to "disrupt" the SWP, the government's involvement elsewhere (e.g., Chicago) with right-wing groups which perform the dirty work to carry out the government's objectives, and the fact that one of the Los Angeles terrorists stated that the incident had been instigated by a man who identified himself as an agent of the CIA.

58(b): Three of the terrorists were Mario Pelaez, Reynaldo Castro and Reynaldo Gonzales. Plaintiffs do not know the names or descriptions of the others.

58(c): The names of the witnesses to the incident are: Peter Seidman, Carole Seligman, Sally Whicker, and Tiby Alvin. As to their addresses, plaintiffs object to the interrogatory on the grounds stated under No. 1(d).

58(d): The fire referred to in paragraph 71 of the Complaint damaged the walls, ceiling and floor of the office, and damaged or destroyed much of the contents of the office including files, books and furniture.

58(e): The incident was reported to the Los Angeles Police Department. Plaintiffs do not recall the individual who made the report. Plaintiffs know of no action taken by the Police Department.

59(a): See answer to No. 58(a).

59(b): 3806 Wheeler.

59(c): None.

59(d): The blast destroyed books, furniture, files and related materials.

59(e): See answer to No. 59(d).

59(f): Campaign activities were disrupted in that campaign literature was destroyed and human and financial resources were diverted from campaign activities into compensating for the damage,

In addition, fear of recurrent violence deterred supporters and potential volunteer campaign workers from associating with the campaign and from assembling at the campaign office.

59(g): The incident was reported to Houston Police Department. Plaintiffs do not recall the specific individual who made the report. Police officers investigated at the scene. Plaintiffs know of no other action taken by the Police Department as a result of the report.

60: The basis of the allegation is that the said defendants were actively and often intimately involved in the day-to-day operations of the government agencies which carried out the activities complained of. In addition, the said defendants assumed an unusually active role in domestic intelligence activities. One example of this is their creation of the Huston Plan; another example is their perpetration of the burglary of Ellsberg's psychiatrist; another is the institution in 1969 of "Operation Inlet" by which FBI agents were ordered to transmit domestic intelligence information directly to the White House, instead of putting it through normal Bureau channels.

61: See answer to No. 60. The defendants jointly and severally had the power and the duty throughout the period of their government employment to prevent the acts complained of. The defendants should have acted pursuant to the power inherent in their respective offices. The defendants concealed the events throughout their tenure as public officials and thereafter, up to and including the present moment. Recurrence was facilitated in that defendants' concealment of their unlawful activities prevented effective legal action to end the activities, and preserved defendants from the inhibiting effect of public revulsion.

62. The names and addresses of many deterred supporters and potential supporters are unknown to plaintiffs and cannot be learned for the reason that defendants' actions have made them fearful of coming forward and openly identifying themselves to and with plaintiffs.

Nevertheless, plaintiffs do have knowledge of the identity of a number of such persons. In most of these cases, we are not free to identify them because they would then be subject to the very government tactics which they have sought to avoid by limiting their political involvement. Accordingly, insofar as No. 62 seeks disclosure of the names and addresses of such persons, plaintiffs object on the ground that the information is privileged by the First Amendment.

63. Insofar as the damaged plaintiffs are differentiated from the members of the class in general, their names appear in paragraphs 78 through 86 of the Complaint. As to addresses, plaintiffs object for the reasons stated under No. 1(d). Each of the said paragraphs of the Complaint designates the damage claimed either as property damage or for violation of constitutional rights. Where property damages are claimed, they are based on loss or damages to property as described in answers to Nos. 57(b), 58(d) and 59(d) above. The computations are based on estimated repair and/or replacement value. Where damages are claimed for violation of constitutional rights, the amounts are based on a variety of factors including

the sanctity of the rights invaded, the number of persons injured, the number of incidents, the relative violence of the acts complained of and the need for substantial damage awards as a means of deterring official lawlessness.

64: Some plaintiffs have made written statements concerning facts related to the allegations in the Complaint, as well as injuries or damages which they suffered as a result. However, plaintiffs object to further inquiry into these statements on the ground that they were written in preparation for litigation.

Dated: New York, New York
April 3, 1974

Signed as to answers,
s/ John M. Ratliff

Signed as to objections,
s/ Herbert Jordan
Rabinowitz, Boudin & Standard
Attorneys for Plaintiffs