

14 Charles Lane
New York, N.Y. 10014
February 22, 1974

TO ALL NATIONAL COMMITTEE MEMBERS AND ORGANIZERS

Dear Comrades,

Attached for your information is a copy of the "Interrogatories and Request for Documents" filed by the government last week in connection with the SWP and YSA Watergate suit.

The questions indicate the lines of argument that the government is likely to use in its defense against the suit.

Many of the questions provide an excellent opportunity to present the views and positions of the party and of the YSA. Others clearly infringe on our constitutional rights and we will refuse to answer them.

We are in the process of discussing our answers here and are consulting with our lawyers about them.

The Political Rights Defense Fund has decided not to release these questions to the news media until we have prepared our answer.

Comradely,

Betsey Stone
Betsey Stone
National Office

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

SOCIALIST WORKERS PARTIES, et al., :

Plaintiffs, :

-against- :

INTERROGATORIES &
REQUESTS FOR
DOCUMENTS

ATTORNEY GENERAL OF THE UNITED STATES, et al., :

Defendants. -----x

73 Civ. 3160 (TPG)

SIRS:

PLEASE TAKE NOTICE that the federal defendants herein by their attorney, Paul J. Curran, United States Attorney for the Southern District of New York, pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, hereby request plaintiffs' to answer under oath the following written interrogatories as well as requests for documents separately and fully in writing within thirty (30) days after the date of service of this notice. The answers should include all information known up to the date of the verification thereof.

1. In paragraph 3 of the complaint, plaintiffs' allege a class containing approximately 100,000 members, for all of whom the complaint seeks injunctive relief and substantial monetary damages.

(a) State in detail the basis for the above figure of 100,000 members of the class.

(b) State the number of present members of the Socialist Workers Party (SWP) and the Young Socialist Alliance (YSA), respectively.

(c) State the number of post-1948 members and supporters, respectively, of both the SWP and YSA.

(d) Do plaintiffs maintain a list or lists of current members of SWP and YSA? If so, where are such lists maintained? If not, describe what other documentation is maintained by plaintiffs showing names and addresses of members and/or of supporters.

(3) Do the plaintiffs maintain a list of past members and/or supporters of SWP and YSA and their addresses? If so, where are such lists maintained? If not, describe what other documentation is maintained by plaintiffs' showing names and addresses of past members and/or supporters.

(f) List the names and addresses of all post-1968 candidates of the Socialist Workers Party for elective public office as well as the number of known supporters for each and the basis of the latter figures.

2. In paragraphs 4 and 5 of the complaint, plaintiffs allege that the SWP is an unincorporated political party and YSA an unincorporated association, with members throughout the United States and National Offices in New York City.

(a) List the addresses of all other offices or chapters of SWP and YSA and the number of members or supporters associated or otherwise affiliated with each.

(b) Describe in detail the organizational structure of the SWP and of the YSA, including the names and/or titles of all officers, directors, committees or other entities which participate in or control SWP or YSA policy, action and discipline, and describe briefly the duties or responsibilities of each such person or entity. Include all individuals or entities, whether they so function on a continuous or intermittent basis.

(c) List the names and current addresses of any and all individuals who presently occupy any of the positions or have any of the titles or are members of any of the committees referred to in answer to interrogatory 2(b) above.

(d) Describe the process by which officers, members of national committees and candidates for election are nominated and selected by SWP and YSA.

3. Is YSA dominated and/or controlled by SWP? If the answer is no, state the organizational, policy, and disciplinary relationship between YSA and SWP.

4. (a) How many members of SWP are also members of YSA?

(b) Do SWP members hold positions of leadership in YSA? If so, specify the positions of leadership in YSA on the national and local level held by SWP members, giving the name of the YSA office, the name of each individual holding such office and his address.

(c) Have any SWP candidates also been members of YSA at the time of the respective election for which they were campaigning? If so, specify the name, address, and office sought, in each instance.

5. In paragraphs 4 and 5 of the complaint, plaintiffs allege that SWP seeks to replace capitalism in the United States with socialism, and that YSA shares SWP's objectives.

(a) Describe the methods with which SWP or YSA seek to replace capitalism in the United States with socialism, and whether all plaintiffs agree with or employ the same methods.

(b) Are SWP and or YSA Trotskyist-Communist organizations in that they are guided by the teachings of Marx, Engels and Lenin as interpreted by Trotsky in regard to the achievement of revolution, dictatorship of the proletariat, and the institution of communism in the United States and elsewhere in the world? If the answer to the above is no, describe fully the nature of the organizations relating to their position on revolution, dictatorship of the proletariat and the institution of communism.

(c) As Marxists and/or Trotskyists, are plaintiffs preparing themselves for an inevitable communist revolution in the United States?

(d) As Marxists and Trotskyists, have plaintiffs ever been or are they now guided in a belief that established authorities in the United States would resist a communist revolution, and are they accordingly preparing themselves for an inevitable violent revolution in the United States?

(e) As Marxists and Trotskyists, are plaintiffs preparing themselves for participation in a violent revolution in the United States, as members of a revolutionary class, when that revolution occurs?

(f) Are plaintiffs as Marxists and as Trotskyists and as members of the SWP and YSA working toward the development of a revolutionary party which will precipitate the desired revolution?

(g) Are plaintiffs as Marxists and Trotskyists and members of SWP and YSA preparing themselves to seize control of the revolution when it occurs?

(h) Are SWP and YSA and individual plaintiffs preparing themselves to use violence to achieve revolution and dictatorship of the proletariat and the institution of communism, if peaceful means are ineffective? If the answer is no, state the position of SWP, YSA and the individual plaintiffs on this question and whether any of the plaintiffs are in disagreement on this question.

(i) Do SWP, YSA and individual plaintiffs absolutely reject the use at any time of violence to achieve revolution in the United States, dictatorship of the proletariat and the institution of communism? If not, state the position of plaintiffs on this question concerning the use of violence. If plaintiffs disagree among themselves, state the position of each plaintiff.

(j) Are plaintiffs in their activities preparing themselves to disregard and disobey laws of the United States if and when these laws impede their desired revolution?

(k) State the conditions or circumstances under which plaintiffs will violate laws or the Constitution of the United States.

(l) Do plaintiffs as Marxists, Trotskyists and members of SWP and YSA contend that a revolutionary situation exists in the United States at the present time in which they should take action to further precipitate the actual revolution? If not, state SWP, YSA and other plaintiffs' position on the conditions which must exist in the United States in order to create such a revolutionary situation.

(m) Are plaintiffs actively engaged in an effort to create such a revolutionary situation in the United States? If the answer is no, state the purpose of their activities as members of SWP and YSA. If the answer is yes, describe in detail plaintiffs' efforts and activities to create a revolutionary situation.

(n) Is it or has it ever been a policy or a principle of plaintiffs to defend the USSR against imperialist enemies?

(o) Do plaintiffs regard the United States as an imperialist enemy of the USSR?

(p) In the event of a conflict between the USSR and the United States, do plaintiffs as Marxists and Trotskyists have a duty to defend the USSR against the United States?

(q) What is the policy of SWP or YSA now, and what has it been in the past with regard to treatment or discipline of members who desire to renounce the Trotskyist position of an unconditional defense of the Soviet Union against an imperialist attack?

(r) Have any members of SWP or YSA in the past expressed a desire to renounce the Trotskyist position of unconditional defense of the Soviet Union against imperialist attack? If so, describe each such incident, whether such people were expelled from membership or otherwise disciplined by YSA or SWP, and list their names and last known addresses.

(s) Are plaintiffs prepared to follow the teachings of Trotsky that the revolution requires "of the revolutionary class that it should obtain its ends by all methods at its disposal-- if necessary by an armed rising; if required, by terrorism." (From a pamphlet written by Trotsky in 1920, entitled "Terrorism and Communism"). If not, explain the reasons why not.

(5) Do plaintiffs consider themselves in the revolutionary class? Describe plaintiffs conception of the revolutionary class?

(u) Are plaintiffs preparing to attain their revolutionary ends by all methods at their disposal including armed rising and, if required, by terrorism?

(v) Is it true that all activities of the SWP and YSA are subordinated to the aim of organization of the working class for the struggle for power and the transformation of the existing social order?

(w) Are plaintiffs attempting to build a combat-type party organization? If so, explain the need for such an organization.

6. (a) Does the constitution of the SWP state that "the purpose of the party shall be to educate and organize the working class for the abolition of capitalism and the establishment of a workers' government to achieve socialism"?

(b) Describe a workers government. Is this synonymous with a dictatorship of the proletariat?

(c) What is meant by socialism in the context of the SWP constitution? Is this synonymous with the early stages of communism?

7. (a) Does the constitution of the YSA state that "the YSA is a nationwide revolutionary youth organization, uniting young workers and students around the banner of socialism and

and dedicated to the building of a revolutionary movement which can lead the working people to socialism"?

(b) In the context of that constitution is socialism synonymous with the early stages of communism?

(c) Does the goal of revolution envision the use of violence if required?

8. (a) Has SWP issued a declaration of principles which states that the SWP goal is the "overthrow of the capitalist state and the transfer of sovereignty from it to their own Workers' State--the Dictatorship of the Proletariat"? If so, is such declaration of principles still effective?

(b) Has SWP issued a declaration of principles which stated that "it is consequently the elementary and imperative duty of all workers and especially of the revolutionary party to defend the Socialist Union unconditionally against any and every imperialist nation"? If so, is such declaration still effective?

9. (a) Have SWP or YSA members or representatives ever attended or participated in Fourth International (hereinafter "FI") meetings, counsels, and/or congresses?

(b) If so, describe the organization, aims and purposes of the FI, including its membership, the location of its affiliated organizations, the location of its headquarters, and the identity of its officers to the full extent such information is known to the plaintiffs.

(c) Describe the position or status of SWP and YSA members or representatives who have attended any FI meetings, counsels and congresses, and describe how and on what basis these individuals are chosen or selected.

(d) List the names and addresses of the current members of SWP and YSA who participate in FI meetings, counsels and congresses.

(e) List the names and addresses of members of SWP and YSA who have attended FI meetings, counsels and congresses in the past.

10. (a) Was SWP or any of its members involved in any way in the formation of the FI? Describe in detail any such involvement.

(b) Was SWP at any time the official American section of the FI?

(c) Did SWP sever its formal membership in FI? If so, describe when and why.

(d) Has SWP continued any "fraternal relationship" or other association or involvement with or support of the FI up to the present time? Describe fully the nature of this fraternal relationship or other involvement with the FI and the dates thereof.

(e) Do SWP, YSA or its members give financial support to the FI? If so, when and where have payments been made? How has this money been raised?

(f) Have SWP members or representatives voted in FI meetings, councils or congresses since SWP severed formal affiliation with FI?

(g) State the nature and extent of the plans, if any, of plaintiff SWP to participate in the Tenth World Congress of the FI, including the names and addresses of any SWP members or representatives who are to attend, and their instructions from plaintiff SWP.

(h) If no plans regarding SWP participation in the Tenth World Congress of the FI have been finalized, state whether such participation has been discussed at any meeting, conference or congress and set forth the dates and locations of such conference or meeting and the names and addresses of those SWP members who attended.

(i) Have SWP members or representatives, now or at any time in the past, at FI meetings, councils or congresses received any funds in the form of salary, expenses or otherwise for or during their attendance at such meetings, councils or congresses? If so, by whom is this paid, in what amounts and who are or have been the recipients of any such funds?

(j) Describe in detail the means by which SWP receives educational or informational material from the FI and the means, if any, by which the same is disseminated in the United States.

(k) Does the FI give financial or other support to Trotskyist groups in other countries outside the United States? Do any members of SWP or YSA or any other plaintiffs support this activity?

(l) Does the FI support guerrilla warfare by Trotskyist groups in South America or elsewhere? Do any members of the SWP or YSA agree with FI support of such guerrilla warfare activity?

11. (a) Have SWP, YSA or any of its members or any other plaintiffs in any way aided the creation of a revolutionary situation any place in the world? If so, describe in detail.

(b) Have SWP, YSA or any of its members or any other plaintiffs in any way aided violent revolution or guerrilla warfare any place in the world? If so, describe in detail.

12. Has plaintiff James P. Cannon traveled abroad to meet with representatives of Trotskyist groups other than the Fourth International? Describe the purposes of any such meetings, their results and state the dates and locations of such meetings.

13. Have any individual plaintiffs other than James P. Cannon traveled abroad to meet with representatives of Trotskyist groups other than FI? If so, furnish the identity of such plaintiffs, describe the purpose of such meetings, their results and state the dates and locations of such meetings.

14. Have SWP or YSA sent members or representatives abroad to meet with Trotskyist groups other than FI? If so, furnish

details concerning this travel and these meetings including purposes, results and locations of the same, and names and addresses of persons attending.

15. Have SWP, YSA, James P. Cannon or other individual plaintiffs received in the United States members or representatives of the FI or other foreign Trotskyist groups? If so, furnish details concerning these meetings, the identity of the foreign individuals, the purposes of the meetings, their results and their dates and locations.

16. In paragraphs 4 and 5 of the complaint it is alleged that to further its objective, SWP nominates candidates for public office and otherwise participates in the electoral process at all levels of state and local government, that YSA has endorsed SWP candidates in every election since 1960 and that YSA members have worked on behalf of such candidates.

(a) Do SWP, YSA and individual plaintiffs take the position that there is a "parliamentary road" to socialism--that is, is it their position that they can achieve their revolutionary goals through peaceful elections? If the answer is yes, have SWP and/or YSA and individual plaintiffs made statements to the contrary in the past? If so, identify previous positions on this question.

(b) Is SWP and YSA's participation in United States elections a part of SWP and YSA revolutionary strategy? If yes, explain the strategy in detail; if not, state the purpose of their participation in United States elections.

(c) Is it a purpose of SWP, YSA and/or individual plaintiffs by participating in United States elections to make every effort to create a revolutionary situation?

17. (a) State the date of birth of plaintiff Linda Jenness, and the age she would have been at the time she would have assumed the office of President of the United States, had she been elected in 1972.

(b) Was she eligible under the Constitution of the United States to assume the office of President in the event of her election?

(c) If not, why was she a candidate for this office?

18. (a) State the date of birth of plaintiff Andrew Pulley and his age at the time he would have assumed the office of Vice-President of the United States had he been elected in 1972.

(b) Was he eligible under the Constitution of the United States to assume the office of Vice-President of the United States in the event of his election?

(c) If not, why was he a candidate for this office?

(d) Describe in detail his duties as national secretary of YSA and the time period in which he assumed such office.

19. (a) State the dates of birth of plaintiffs ~~Christy Wallace, Deborah P. Bustin, Maceo Dixon, Dan Fein, Craig Honts, Norman Oliver, Roberta L. Scherr and Jane Van Deusen.~~

(b) State the age requirement for assumption of each of the offices for which the above-named plaintiffs were candidates.

20. Describe the duties of Mr. Charles Bolduc as Michigan organizer for SWP during the 1972 election campaign, including his role in setting or implementation of policy or discipline.

21. State the duties of Mr. James P. Cannon as National Chairman of SWP, the period during which he assumed such duties, and the present duties, if any, which he has in SWP or YSA.

22. (a) Was plaintiff James P. Cannon at any time a member of the Communist Party of the United States?

(b) Were plaintiff James P. Cannon and/or any of his followers or associates ever expelled or otherwise removed from membership in the Communist Party of the United States? If so, describe the situation and reasons for such actions.

(c) Were plaintiff James P. Cannon and/or any of his followers or associates ever members of the Socialist Party? If so, state the dates of any such membership.

(d) Were plaintiff James P. Cannon and/or other plaintiffs or followers of Mr. Cannon at any time expelled or otherwise removed from membership in the Socialist Party? If so, describe the situations and reasons for such actions.

23. Have plaintiff James P. Cannon and/or any other past or present member or members of SWP ever been convicted in a United States federal court of advocating the overthrow of the Government by force and violence? If so, state the date of any such conviction, the offices if any held by any such person in SWP at the time, and whether and for how long any such persons were sentenced to prison.

24. In paragraph 33 of the complaint, it is alleged that certain defendants and their predecessors "agreed expressly and by adherence to a common design, to cause agents of the United States government" to engage in various activities.

(a) Is it contended that any defendant or their predecessors specifically met on any occasions in order to agree to this common design? If so, specify the dates and locations of any such meetings and the basis, if any, for plaintiffs' contention that any such agreement or common design was a subject of such meeting.

(b) Is it contended there is anything in writing or otherwise recorded relating to any such agreement or common design? If so, describe in detail the nature of any such writing or other recording, its date and the parties thereto, and the basis if any for plaintiffs' contentions that any such agreement or common design was a subject of such writing or other recording.

(c) Describe in detail any overt acts of any defendant's which is contended occurred to put into effect the alleged agreement or common design, and the basis if any for such contentions.

25. In paragraph 34 of the complaint, it is alleged that defendants Nixon, Ehrlichman, Haldeman, Mitchell, Dean, Huston and Mardian together with others "agreed to implement and expand the above-described agreement and to cause government agents to intensify" certain activities.

(a) Is it contended that any of the above individuals at any time met and agreed to implement and expand such agreement? If so, specify the dates and locations of any such meetings and the basis, if any, on which it is alleged that any such agreement was a subject of such meeting.

(b) Is it contended that there is anything in writing or any other documentation relating to any such agreement? If so, describe in detail the nature of any writing or other recording and the basis, if any, for plaintiffs' contention that any such agreement was the subject of such writing or other recording.

(c) Describe in detail any overt acts by the named defendants which it is contended occurred to put such agreement into effect, and the basis if any for such contentions.

26. Is it contended that any plan, agreement or common design as specified in paragraph 33 of the complaint was implemented at any time prior to July, 1970. If so, describe in detail the basis for any such contention, the extent to which it is contended that such plan was then implemented and the date thereof.

27. Describe in detail what is meant by "excessive interrogation" alleged to have been performed by any defendant or their agents.

28. Describe in detail each instance of alleged excessive interrogation, including the person interrogated, their name and address, the length of such interrogation, the date and place of such interrogation, the persons who performed the interrogation, the position or relationship to the government or any defendants of such persons, any documentation related thereto, and the specific injury or damage which it is alleged was caused by such interrogation.

29. Describe in detail each instance of employment discrimination which it is alleged was engaged in by defendants including the persons discriminated against, their name and address, the dates and circumstances of such discrimination, the method of discrimination, the defendants or their agents who were directly involved in the discrimination and their position or relationship to the Government, and any documentation, whatever, relating thereto. Specify any injury or damage in each instance which it is alleged occurred as a result of such discrimination.

30. Describe in detail what is meant by any other "harassment" by any defendant against any plaintiff as referred to in para-

graphs 33 and 34 of the complaint.

31. For each instance in which such other harassment is alleged to have occurred, specify the nature of the harassment, the name and address of the person harrassed, the length of the harrassment, its date and place, the persons who performed it, their position or relationship to the government or any defendants, and any documentation whatever related thereto, and the specific damage or injury, if any, which was caused by such harrassment.

32. Specify in detail each instance of warrantless electronic surveillance which it is contended was performed by any defendant on any plaintiff including the type of electronic surveillance, the name and address of the person surveilled, the location and length of time of the surveillance, the person or persons performing the surveillance, the basis if any including any documentation whatever which would in any way connect such surveillance with any of the defendants or their agents, and the specific injury or damage, if any, to each plaintiff which was caused by such surveillance.

33. Specify in detail each instance of alleged unauthorized opening of mail by a defendant or his agent, including where the mail was intercepted by defendant or his agent, when, the person to whom the mail was addressed, the person from whom the mail was received, the class of mail involved, the individual who it is alleged opened such mail, their position or association with the defendants and the basis, if any, for the contention that such person opened the mail, and the injury or damages which it is alleged occurred as a result thereof.

34. Specify in detail each instance of alleged unauthorized monitoring of mail by a defendant or his agent, including where the mail was monitored, when, the person to whom the mail was addressed, the person from whom the mail was received, the class of mail involved, the individual who it is alleged monitored such mail, their position or association with the defendants, the basis, if any, for the contention that such person unauthor- izedly monitored such mail, and the injury or damages which it is alleged occurred as a result thereof.

35. Specify in detail the nature of any burglary alleged to have been engaged in by any defendant or his agent, including the date, time and location of each such burglary, the relationship of such location to any plaintiff, the name and address of such plaintiff, the name of any plaintiff or other person having knowledge of the details of any such burglary, the person or persons who it is contended carried out such burglary, their connection, if any, with any defendant or his agent, the basis if any, including any documentation whatever for the contention that any such burglary was committed by a defendant or his agent, the property which it is alleged was stolen, and the specific nature of the damages or injury which is alleged result from such burglary.

36. (a) Describe in detail what is meant by the "other illegal means" as referred to in paragraph 33 of the complaint which it is alleged were used by any defendant or their agents against any plaintiff.

(b) For each instance in which it is alleged that such other illegal means was employed, specify the nature of the illegal means, when and where it was employed, the length of its use, the persons who used the same, their position or relationship to the defendants, the basis if any including any documentation whatever for the contention that such illegal acts were carried out by defendants or their agents, and the specific injury or damage which it is alleged occurred as a result thereof.

37. With regard to the allegations in paragraph 35 of the complaint, state the functional nexus between defendants' actions and the deterrence experienced by plaintiffs including the specific facts which led plaintiffs to conclude that such deterrence was caused by defendants or their agents.

38. With regard to the allegations in paragraph 35 of the complaint: (a) List any and all persons and their addresses who it is contended have ever been prevented from running for office as a result of any actions of any defendants or their agents. Specify in detail the times, dates and office sought by such individuals and any documents or other recorded statements relating to plaintiffs' contentions that defendants in any way caused such persons not to run for public office.

(b) List any persons and their addresses who it is contended have ever been prevented from obtaining public office by the actions of any defendants. In each instance, list the number of votes obtained by such candidate and the number of votes obtained by the winning candidate. Describe in detail any specific actions alleged to have been taken by defendants or their agents, including any documentation thereof, which in any way support plaintiffs' contentions that such defendants or their agents prevented such plaintiff from winning such an election.

39. State the basis, if any, of the allegations of paragraph 36 of the complaint, including in what way, by what acts, and on what occasions it is contended that the named defendants caused the events described therein, any documentation whatever by which plaintiffs support their contention that such defendants caused such events, whether it is alleged that the named defendants continued to act in concert, the times and places and any documentation whatever of any meetings at which it is alleged that such events were caused in concert, and the basis, if any, for plaintiffs' contentions that such meeting or documents related to the causation of such events.

40. With regard to paragraph 38 of the complaint, describe in detail each of the "variety of handicaps" which it is alleged that the plaintiffs have been subjected to as a result of their being listed on the Attorney General's list including the nature, date, time, location, persons directly causing the handicap, names and addresses of persons handicapped, and the effect of such handicap.

41. With regard to the allegations contained in paragraphs 39, 40, 41 and 42 of the complaint, state in detail: (a) the date, location and duration of each interrogation, contact or surveillance; (b) the name and address of each member, supporter,

candidate for elective public office, landlord, employer, parent or friend complaining of such interrogation, contact or surveillance; (c) a description of the interrogation, contact or surveillance, including tactics and methods employed; (d) the number of interrogators or surveillants involved; (e) Identity of the interrogators or surveillants by name or physical description; (f) identification or description of any technical aids or equipment used in the course of the surveillance or interrogation; (g) The specific facts which lead the plaintiffs to conclude that the defendants or their agents were responsible for such surveillance, contact or interrogation; (h) The specific nature and extent of the injury caused by such surveillance, contact or interrogation.

42. With regard to the allegations of paragraph 42 of the complaint please state:

(a) The name and address of each SWP member or supporter who was the subject of pressure, threat, bribery or other enticement;

(b) The nature of such pressure, threat, bribe, or other enticement;

(c) The person applying such pressure, threat, bribery or other enticement;

(d) The particular facts which led each such member or supporter to believe that they were being induced to withdraw such support.

43. With regard to the allegations of paragraph 43 of the complaint, state:

(a) The name and address of each SWP member or supporter whose affiliation was disclosed or subjected to a threat of disclosure by FBI agents to such member or supporter, family, employer, prospective employer, landlord or other person;

(b) The person who disclosed the information and the name and address of the person to whom it was disclosed;

(c) The particular facts that led plaintiffs to believe that such threat or disclosure was for the purpose of provoking hostility and discrimination against SWP or YSA members or supporters.

44. (a) Have SWP or YSA ever been subjected to disruption by members or supporters of the Communist Party, the National Caucus of Labor Committees (NCLC), Legion of Justice, Spartacist League or by any other group or individual expressing Trotskyist, Marxist, Communist, Castroist or other views?

(b) If so, describe in detail the nature of such disruption including dates, locations and times of any such suspected disruption.

(c) Specify in detail the basis for plaintiffs' contentions or beliefs that any of the activities alleged to have occurred

or caused by defendants in this action were caused by such defendants rather than any of the individuals or organizations heretofore specified in this interrogatory and/or the answers thereto.

45. With regard to the allegations in Paragraphs 46 through 53 of the complaint, please state, for each person affected:

- (a) The name and address of each person whom it is alleged was so singled out;
- (b) The name of the person or persons who singled out such SWP or YSA members or supporter, and their position or association with any of the defendants;
- (c) A description of the action taken by any such person who was associated with any of the defendants;
- (d) The time and location of such action.
- (e) Whether it is contended that any defendants or their agents was dismissed from federal employment, denied entry into the Army, discharged from the Army, or classified "4-F" by the Selective Service solely on account of affiliation with SWP or YSA and support of SWP and its candidates for elective public office. If so, state the basis if any for such contention, whether or not any administrative or judicial proceedings challenging the dismissal, denial, discharge or classification have ever been instituted and the dates and results thereof.
- (f) The basis if any, for the allegation that the purpose of each of the acts described "is to harrass and intimidate SWP, its members, candidates and supporters (including members of YSA) and to impair their ability to attract other supporters and to participate effectively in the federal, state and local electoral process."
- (g) The name and address of each SWP or YSA member, candidate or supporter who claims that they have been harrassed and intimidated by the acts described or who claims that their ability to attract other supporters or participate effectively in the electoral process has been impaired, and the specific circumstances of harassment, intimidation or impairment of which they complain.
- (h) The date and a brief description of any correspondence, statement or other documentation which relate in any way to the action of defendants described or its effect on the particular plaintiff or plaintiffs involved.

46. With regard to Emily Rose Homonoff, who is mentioned in paragraph 46 of the Complaint, please state:

- (a) Whether she is a member of plaintiffs' class, and if so, in what capacity;
- (b) Her present address and place of employment, if known to plaintiffs;

or caused by defendants in this action were caused by such defendants rather than any of the individuals or organizations heretofore specified in this interrogatory and/or the answers thereto.

45. With regard to the allegations in Paragraphs 46 through 53 of the complaint, please state, for each person affected:

- (a) The name and address of each person whom it is alleged was so singled out;
- (b) The name of the person or persons who singled out such SWP or YSA members or supporter, and their position or association with any of the defendants;
- (c) A description of the action taken by any such person who was associated with any of the defendants;
- (d) The time and location of such action.
- (e) Whether it is contended that any defendants or their agents was dismissed from federal employment, denied entry into the Army, discharged from the Army, or classified "4-F" by the Selective Service solely on account of affiliation with SWP or YSA and support of SWP and its candidates for elective public office. If so, state the basis if any for such contention, whether or not any administrative or judicial proceedings challenging the dismissal, denial, discharge or classification have ever been instituted and the dates and results thereof.
- (f) The basis if any, for the allegation that the purpose of each of the acts described "is to harrass and intimidate SWP, its members, candidates and supporters (including members of YSA) and to impair their ability to attract other supporters and to participate effectively in the federal, state and local electoral process."
- (g) The name and address of each SWP or YSA member, candidate or supporter who claims that they have been harrassed and intimidated by the acts described or who claims that their ability to attract other supporters or participate effectively in the electoral process has been impaired, and the specific circumstances of harassment, intimidation or impairment of which they complain.
- (h) The date and a brief description of any correspondence, statement or other documentation which relate in any way to the action of defendants described or its effect on the particular plaintiff or plaintiffs involved.

46. With regard to Emily Rose Homonoff, who is mentioned in paragraph 46 of the Complaint, please state:

- (a) Whether she is a member of plaintiffs' class, and if so, in what capacity;
- (b) Her present address and place of employment, if known to plaintiffs;

(c) Whether she was ever removed from a position as a federal employee as a result of the alleged affiliation with SWP or YSA or support of its candidates.

47. With regard to plaintiff Alice P. Woznack, please state:

(a) Her present address and place of employment;

(b) Whether she was ever removed from a position as a federal employee, and if so the reasons therefor.

48. With regard to the allegations in paragraphs 56 and 57 of the complaint, describe in detail the circumstances and nature of the alleged threats, including the dates thereof.

49. With respect to the allegations contained in paragraph 58 of the complaint, please state:

(a) The name and address of the repairman for the Pacific Bell Telephone Company who discovered the alleged wiretap;

(b) Whether plaintiff James P. Cannon reported such alleged wiretap to the telephone company or to any law enforcement agency. If the answer is in the affirmative, state;

(i) when such report was made,

(ii) the name and address of the person to whom such report was made,

(iii) the substance of such report,

(iv) what action was taken as a result of such report.

If no report was made, state the reason(s) for failure to make the same.

50. Specify the "information" and set forth the basis for the "belief" referred to in paragraph 59 of the Complaint that defendant unknown agents installed the alleged wiretap and used it to intercept the communications of plaintiff Cannon and other plaintiffs.

51. With respect to the allegations contained in paragraph 59 of the Complaint, state in detail:

(a) Plaintiff Cannon's telephone number at the time the repairman discovered the alleged wiretap, the person who contracted the telephone service and the person who paid the telephone bills;

(b) The name and address of each party to each alleged overheard conversation;

(c) The specific facts which lead plaintiff Cannon to conclude that the alleged surveillance had been conducted by defendants or their agents;

(d) The substance of any overheard conversation.

52. Specify the "information" and set forth the basis for the "belief" referred to in paragraphs 60 and 61 of the Complaint that the conversation of SWP members, supporters, and candidates were unlawfully:

- (a) intercepted;
 - (b) disclosed;
 - (c) used;
- by the defendants or their agents.

53. With respect to the allegation contained in paragraphs 60 and 61 of the Complaint, state in detail:

(a) The locations in New York, Detroit, Seattle, Los Angeles, Houston and other United States cities where such electronic surveillance allegedly occurred;

(b) The telephone numbers at such addresses during the period prior to and throughout the 1972 and 1973 election campaigns, the persons who contracted for telephone service and the person who paid the telephone bills;

(c) The date and location of each alleged surveillance or overhearing;

(d) The name and address of each party to each alleged overheard conversation;

(e) As to each alleged surveillance or overhearing, the specific facts which lead the plaintiffs to conclude that the premises or conversations were subject to electronic surveillance;

(f) As to each alleged surveillance or overhearing, the specific facts which lead plaintiff to conclude that the surveillance had been conducted by defendants or their agents;

(g) The substance of any overheard conversations;

(h) Whether any complaint was made to:

(i) The Federal Government;

(ii) The appropriate telephone company;

(iii) Any appropriate State or local Government;

(iv) Anyone else concerning such surveillance,

If so, state the nature of the complaint in detail and the response thereto. If no complaint was made, state the reason or reasons for failure to make the same.

54. With regard to the allegations in paragraphs 62 and 63 of the complaint:

(a) Describe the letters which it is alleged were so removed and examined;

(b) The basis if any for the allegation that such letters were removed and examined;

(c) The nature of the "information" and the basis of the "belief" that the alleged act was committed for the purpose alleged;

(d) Whether plaintiff Duncan Gordon was aware at the time of efforts of Mr. Nogi to contact him and if so, of the reasons for such attempted contact.

55. With respect to the allegations in paragraph 64 of the complaint, state in detail:

(a) The "information" and the basis for the "belief" referred to therein.

(b) The specific dates and locations at which such mail was allegedly opened, perused, copied and resealed, and the person and address to which such mail was addressed;

(c) The dates and locations at which plaintiffs first discovered that such mail was opened, perused, copied and resealed;

(d) Whether plaintiffs reported the apparent opening, perusal, copying or resealing to the United States Postal Service or to any law enforcement agency. If the answer to the foregoing is in the affirmative, state:

(i) by whom such report was made,

(ii) when such report was made,

(iii) the name and address of the person to whom such report was made,

(iv) the substance of such report,

(v) what action was taken as a result of such report.

If no report was made, state the reason or reasons for failure to make the same.

56. With respect to the allegation contained in paragraph 65 of the Complaint, specify in detail:

(a) The "information" and the basis for the "belief" referred to therein;

(b) The specific dates and locations at which such action was taken, and the persons and addresses to which such mail was addressed;

(c) The dates and locations at which plaintiffs first discovered that such action was being taken;

(d) Whether plaintiffs reported the apparent action to the United States Postal Service, or to any law enforcement agency. If so, provide the same information as requested in parts (i) through (v) of interrogatory 55(d) above. If not, state the reason or reasons for failure to make the same.

57. With respect to the allegations of paragraphs 66 through 70 of the complaint, for each alleged burglary, state:

- (a) the time of the act
- (b) a description of each list, record, or other document which was rifled or removed,
- (c) a description of any item or property not mentioned in the Complaint which was removed or damaged,
- (d) the name and address of each known witness to the burglary,
- (e) the name and address of each person known to have had access to the lists of campaign supporters, campaign contributors, and subscribers to the Militant in the SWP campaign headquarters,
- (f) the name and address of each person known to have had access to the SWP records in Charles Bolduc's apartment,
- (g) the name and address of each person known to have had access to the SWP files in Norman Oliver's apartment,
- (h) whether the burglary was reported to law enforcement authorities, and if so:
 - (i) by whom each report was made,
 - (ii) when each report was made,
 - (iii) where each report was made,
 - (iv) to whom each report was made,
 - (v) the substance of each report,
 - (vi) what action was taken by the law enforcement authority as a result of each report.

If a report was not made for any one of the three alleged burglaries, state the reason or reasons for failure to make such report.

(i) the "information" and the basis for the "belief" that the persons who planned and participated in the burglaries were agents of the particular Government agencies listed,

(j) the "information" and the basis for the "belief" that defendants and their agents have used and will continue to use information allegedly obtained by burglary to intensify alleged harassment of plaintiffs.

58. With respect to the allegations in paragraphs 71 and 72 of the Complaint, please specify

(a) the "information" and the basis for the "belief" that the twelve men were agents of the United States;

(b) the identity, by name or physical description, of each of the twelve men;

(c) the name and address of each known witness to the incident;

(d) a list and description of the property damage sustained;

(e) whether the incident was reported to law enforcement authorities, and if so,

(i) by whom such report was made,

(ii) when such report was made,

- (iii) where such report was made,
- (iv) to whom such report was made,
- (v) what action was taken by the law enforcement authority as a result of such report.

If no report was made, state the reason or reasons for failure to make the same.

59. With respect to the allegations in paragraphs 73 and 74 of the Complaint, please specify

(a) the "information" and the basis for the "belief" that agents of the United States had foreknowledge of, and participated in the planning and execution of the bombing;

(b) the address of the headquarters where the bombing allegedly occurred;

(c) the name and address of each known witness to the explosion, or the planning or execution thereof;

(d) a description of the property damaged by the explosion;

(e) a description of the papers and records damaged or destroyed;

(f) a description of how, and to what degree, campaign activities were disrupted;

(g) whether the incident was reported to law enforcement authorities, and if so,

(i) by whom such report was made,

(ii) when such report was made,

(iii) where such report was made,

(iv) to whom such report was made,

(v) what action was taken by the law enforcement authority as a result of such report.

If no report was made, state the reason or reasons for failure to make the same.

60. Specify the "information" and set forth the basis for the "belief" referred to in paragraph 75 of the Complaint.

61. State with particularity the basis for the allegations contained in paragraph 76 of the Complaint, including the dates, times and places at which it is contended that said defendants neglected or refused to so act, the acts which it is contended should have been taken by each such defendant, the particular power pursuant to which it is contended that each such defendant should have acted, the dates, times, places and methods by which each of the defendants concealed such events, the way in which the recurrence of such events was facilitated, and details of any such recurrence known to plaintiffs. List any documents or other recorded information which in any way support these contentions.

62. With respect to the allegations contained in paragraph 77 of the Complaint, state in detail

(a) the name and address of each SWP members or supporter who was deterred from "openly and freely joining and supporting SWP and its candidates".

(b) the time, place, and circumstances of each instance in which such person was so deterred;

(c) the particular facts relative to defendants' action which caused each such person to be so deterred.

63. With regard to the allegations in paragraphs 78 through 86, respectively, for each plaintiff damaged, list their name, address, and specify in detail the basis for the specific amount of damages claimed, including a description of the damage, the manner of computation, estimates of damages, if any, given by others, and any documents which support the specific amounts requested and the basis for their computation.

64. Have any plaintiffs made written statements concerning facts relating to the allegations in the Complaint, and injuries or damages which they suffered as a result of any actions of defendants or their agents? If so, list each such statement, its date, the name and address of the person making the same, and briefly describe the nature thereof.

You are hereby reminded that, pursuant to Rule 26(e)(2) of the Federal Rules of Civil Procedure, you are under a duty seasonably to amend your responses to the foregoing interrogatories if you should obtain information from which you would know that a prior response was incorrect when made or from which you would know that the prior response, although correct when made, is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment. In addition, pursuant to Rule 26(e)(1), you are a duty to seasonably supplement your response to interrogatories 1(d), (e), (f); 2(c); 4(b), (c); 5(r); 9(b), (d), (e); 10(g), (h), (i), 13, 14, 15, 28, 29, 31, 32, 33, 34, 35, 36(b), 38(a), (b); 40, 41(b), (e), 42(a), (c); 43(a), (b); 45(a), (b), (g), 49(a), (b) (ii); 51(b); 53(b), (d); 55(b), (d) (i), (iii); 56(b), (d) (i), (iii); 57(d), (e), (f), (g), (h), (i), (iv); 58(b), (c), (e) (i), (iv); 59(c), (g) (i), (iv), and 62(a), relating to names and addresses of persons requested therein.

REQUEST FOR DOCUMENTS

You are hereby requested to produce at ten o'clock A.M., on the 21st day of March, 1974, in Room 325, United States Courthouse, Foley Square, New York, New York, the following documents, or copies thereof in the event that the originals are not in your possession or under your control, for inspection and copying by the federal defendants:

1. All documents referred to in response to interrogatories 1(d), (e), 24(b), 25(b), 28, 29, 31, 32, 35, 36(b), 38(a), (b), 39, 45(h), 49(b), 53(h), 55(d), 56(d), 57(h), 58(e), 59(g), 61 and 63.

2. All statements referred to in response to interrogatory no. 64.

3. All current and past constitutions of SWP and/or YSA and amendments thereto.

4. All statements or declarations of principles by SWP and/or YSA adopted since the respective organizations were founded.

5. All current and past by-laws or similar documents of SWP and/or YSA or its governing committees and amendments thereto.

6. Minutes or other records of all national conventions and conferences of SWP and YSA, and resolutions adopted.

7. All papers, correspondence or other documents showing the relationship or association of SWP, YSA or any other plaintiffs with the FI and with other foreign Trotskyist groups.

8. All informational bulletins or other documents issued by any plaintiffs relating to the need for revolution and overthrow of the United States Government, whether immediately or at some time in the future, and/or relating to the use of violence, terrorism or guerilla warfare, regardless of whether or not they represent majority or minority views.

9. All correspondence between plaintiff Joseph P. Cannon or any other plaintiff and Leon Trotsky relating to the aims; purposes and activities of the international Trotskyist movement, or the SWP or the members of any of these groups, as they concern "permanent revolution" in the world and/or revolution in the United States.

10. All financial records of SWP and/or YSA showing monies collected and expended, and purposes of such collections and expenditures, including funds sent to or received from FI or other foreign Trotskyist groups.

11. All records maintained by SWP, YSA or other plaintiffs relating to the travel abroad of any plaintiffs for the purpose of meeting with representatives of the FI or other foreign Trotskyist groups.

Dated: New York, New York
February 15, 1974

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