



27. On what date was the transcript classified Top Secret under Executive Order 11652?

28. Who classified the transcript Top Secret under Executive Order 11652, what agency did he represent, and what was his title and position within that agency?

29. Was the person identified in interrogatory 28 authorized to classify documents Top Secret? By what authority?

30. On what dates did the representatives of the Central Intelligence Agency and the Federal Bureau of Investigation referred to in the answer to plaintiff's interrogatory number 20 examine the January 27 transcript?

31. What are the names of the representatives of the CIA and FBI who have examined the transcript and what titles and positions did they hold?

32. Were the persons identified in the answer to interrogatory number 31 authorized to classify documents Top Secret?

33. Were the persons identified in response to interrogatory number 31 asked to show their security clearances before being allowed to examine the January 27 transcript?

34. Does the January 27 transcript indicate on its face whether it is subject to the General Declassification Schedule? Is it?

35. If the transcript is exempt from the General Declassification Schedule, which exemption is claimed?

36. How many pages long is the transcript and is the entire transcript classified Top Secret or only parts of it?

37. Do the verbatim quotes contained in Chapter One of Gerald Ford's Portrait of the Assassin come from the January 27 transcript?

38. If the answer to the above interrogatory is yes, how many pages of the January 27 transcript are quoted from in Chapter One of Gerald Ford's Portrait of the Assassin?

39. Did disclosure of the parts of the transcript quoted in Gerald Ford's Portrait of the Assassin cause any harm to the national defense or foreign policy of the United States? If the answer is yes, what harm?

40. Did any of the United States Attorneys representing the General Services Administration in this case examine the January 27 transcript prior to February 13, 1974? If the answer is yes, which ones, and on what dates?

41. Executive Order 11652 states that: "The test for assigning 'Top Secret' classification shall be whether its unauthorized disclosure could reasonably be expected to cause exceptionally grave damage to the national security." Which of the following criteria for determining "exceptionally grave damage to the national security" (listed in Section 1(A) of Executive Order 11652) were used as a basis for classifying the January 27, 1964 transcript "Top Secret":

- a) armed hostilities against the United States or its allies?
- b) disruption of foreign relations vitally affecting the national security?
- c) the compromise of vital national defense plans or complex cryptologic and communications intelligence systems?
- d) the revelation of sensitive intelligence operations?
- e) the disclosure of scientific or technological developments vital to national security?

42. Referring to classified information, Executive Order 11652 states: "Wrongful disclosure of such information or material is recognized in the Federal Criminal Code as providing a basis for prosecution." Which provisions of the Federal Criminal Code establish a basis for prosecuting those who wrongfully disclose classified information?

43. Would disclosure of the January 27 transcript constitute a violation of the Federal Criminal Code provisions cited in response to the above interrogatory?

44. Would disclosure of the January 27 transcript be detrimental to the administration and enforcement of the laws and regulations of the United States and its agencies?

45. If the answer to the above interrogatory is yes, which specific laws or regulations?

46. Would disclosure of the January 27 transcript reveal the identity of confidential sources of information and impede or jeopardize future investigations by precluding or limiting the use of the same or similar sources in the future?

Please note that under Rule 33 of the Federal Rules of Civil Procedure you are required to serve upon the undersigned, within 30 days after service of this notice, your answers in writing and under oath to the above interrogatories.

JAMES HIRAM LESAR  
1231 Fourth Street, S. W.  
Washington, D. C. 20024

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing has been made upon the defendant by mailing a copy thereof to its attorney,

Assistant United States Attorney Michael J. Ryan, United States  
Courthouse, Room 3421, Washington, D. C. 20001, on this 27th day  
of February, 1974.

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JAMES HIRAM LESAR