

Why should the judge permit us to depose Rhoads and Briggs?

The simplest way of addressing this is to allege that ~~both~~ neither Rhoads nor the CIA is renowned for fidelity to fact, for speaking truly under oath, and both have long records of this and of needless suppression. Aside from this of totally unjustifiable suppressions.

On executive sessions alone they first withheld all, then all but about a half dozen, then as I forced them to release these still withheld in each case it became apparent that there never was any need of legal sanction for the withholding.

(I thought I gave you a long memo on this some time back.)

We can produce hundreds of pages finally released by the CIA that were masked so injudiciously we can fill in many of the names, all of which are public.

Rhoads, personally, has denied me what he could not legally deny and then given it to others for his own purposes - to others on an exclusive basis. Like GSA-family contract.

The Archives regularly and spuriously invokes "national security." All the earlier transcripts since released. Examples, best, 1/22 and 27, which I have with me. Reading excerpts would blow a judicial mind.

With Briggs by deposing him we believe we can establish the incompetence of the claim about the Nosenko transcript. ^{amind} that when I had figured out this is what it was they invoked National Security to refuse to answer only to confirm it to the media. (No war has started since, either.)

CIA's dependability? I first asked for the files on me in 1971, then with you January 2, 1974, then you were told there were none, and when I pushed a bit they gave me a minor fraction of what I had from other sources. I can prove to the judge that even then they knew they had other files not delivered and contrived to hide this from their general counsel. I do have the proof.

As we discussed, Briggs did not qualify himself as an expert of that to which he swore. Even the Director of the Office of Security swore to the Church committee that they are not all experts and he wasn't on work done under him. (Osborn- ~~is~~ I have it, too.)

Rhoads has not seen fit to even try to reconcile the direct contradictions between two affirmations to the Abzug subcommittee and to the court. We should be permitted to do this and to go into his interpretations of law and regulation when he himself says that making interpretations is improper for him.

How Top Secret can papers be to the CIA when they loose them for months and do nothing?

Be ready to show or read the first two pages of the 9/18 transcript from IV. You can also be ready for what Russell told me. I think a situation of appropriateness may not be impossible.

Personal and privacy rights: they have regularly released matters of sexual and other personal natures. Marina's pregnancy to countless pages on named homosexual allegation. When they have released this voluntarily I had voluntarily disguised identities where I publish and have elected not to publish in other cases. ^{Book:} Oswald in New Orleans. Non-publishing: Valle.

The case of Dean Redlich is well know, was all over the papers and the Congressional Record at the time of the unjustified flap. No question of protection of his reputation. New case also. Is it Rose? You got the decision after I told you.

If he rules against us ask for the opportunity to present him the proofs. I think I published Graham and Rhoads in Post Mortem, which I have with me. I'll give him dozens of pages of records as all kinds of proofs. You might want to remember Green on this when that which was masked was before her just a week ago.

I asked CIA about this withholding a year ago, appealed and have no answer.