

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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: :
HAROLD WEISBERG, : :
: :
Plaintiff, : :
: :
v. : :
: :
C. A. No. 75-1996 : :
: :
U. S. DEPARTMENT OF JUSTICE, : :
: :
Defendant : :
: :
.....

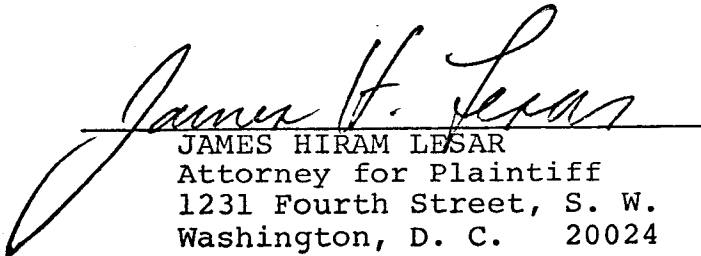
DEC 23 1975

NOTICE OF AMENDMENTS TO COMPLAINT

PLEASE TAKE NOTICE that plaintiff hereby amends his Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.

The amendment consists of adding a new paragraph, paragraph number "10", after paragraph "9". Paragraph "10" shall read:

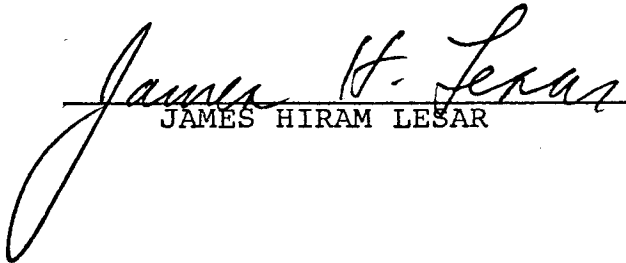
10. By letter dated December 23, 1975, plaintiff submitted an additional Freedom of Information request for records pertaining to the assassination of Dr. King. A copy of this letter is attached hereto as Exhibit F to the Complaint. Plaintiff also brings suit for the twenty-eight numbered items specified in Exhibit F.


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

Phone: [202] 484-6023

CERTIFICATE OF SERVICE

This is to certify that I have this 24th day of December, 1975, mailed a copy of the foregoing Notice of Amendments to Complaint together with the attached Exhibit F to the Complaint to Assistant United States Attorney John Dugan, Room 3419, United States Courthouse, Washington, D. C. 20001.



JAMES HIRAM LESAR

EXHIBIT F

JAMES H. LESAR
ATTORNEY AT LAW
1231 FOURTH STREET, S. W.
WASHINGTON, D. C. 20024
TELEPHONE (202) 484-6023

December 23, 1975

FREEDOM OF INFORMATION REQUEST

Mr. Harold Tyler, Jr.
Deputy Attorney General
U. S. Department of Justice
Washington, D. C. 20530

Dear Mr. Tyler:

On behalf of Mr. Harold Weisberg, I am requesting that you grant him access to the following records pertaining to the assassination of Dr. Martin Luther King, Jr.:

1. All receipts for any letters, cables, documents, reports, memorandums, or other communications in any form whatsoever.
2. All receipts for any items of physical evidence.
3. All reports or memorandums on the results of any tests performed on any item of evidence, including any comparisons normally made in the investigation of a crime.
4. All reports or memorandums on any fingerprints found at the scene of the crime or on any item allegedly related to the crime. This is meant to include, for example, any fingerprints found in or on the white Mustang abandoned in Atlanta, in any room allegedly used or rented by James Earl Ray, and on any registration card. It should also include all fingerprints found on any item considered as evidence in the assassination of Dr. Martin Luther King, Jr.
5. Any taxicab log or manifest of Memphis cab driver James McCraw or the cab company for which he worked.
6. Any tape or transcript of the radio logs of the Memphis Police Department or the Shelby County Sheriff's Office for April 4, 1968.
7. All correspondence and records of other communications exchanged between the Department of Justice or any division thereof and:

R. A. Ashley, Jr.
Harry S. Avery

10. All notes or memorandums pertaining to any telephonic or verbal communications from or on behalf of the District Attorney General of Shelby County, Tennessee, or the Attorney General of Tennessee to the Department of Justice or any division thereof.

11. All tape recordings and all logs, transcripts, notes, reports, memorandums or any other written record of or reflecting any surveillance of any kind whatsoever of the following persons:

Judge Preston Battle
 Wayne Chastain
 Bernard Fensterwald
 Percy Foreman
 Gerold Frank
 Arthur Hanes, Jr.
 Arthur Hanes, Sr.
 Renfro Hays
 Robert W. Hill, Jr.
 William Bradford Huie
 James H. Lesar
 Robert I. Livingston
 George McMillan
 Judge Robert McRae, Jr.
 Albert Pepper
 Carol Pepper
 James Earl Ray
 Jerry Ray
 John Ray
 Richard J. Ryan
 J. B. Stoner
 Russell X. Thompson
 Harold Weisberg

This is meant to include not only physical shadowing but also mail covers, mail interception, interception by any telephonic, electronic, mechanical or other means, as well as conversations with third persons and the use of informants.

12. All tape recordings and all logs, transcripts, notes, reports, memorandums or any other written record of or reflecting any surveillance of any kind whatsoever on the Committee to Investigate Assassinations (CTIA) or any person associated with it in any way.

This is meant to include not only physical shadowing but also mail covers, mail interception, interception by any telephonic, electronic, mechanical or other means, as well as conversations with third persons and the use of informants.

13. All records pertaining to any alleged or contemplated witness, including any statements, transcripts, reports, or memorandums from any source whatsoever.

14. All correspondence of the following persons, regardless of origin or however obtained:

Bernard Fensterwald
 Percy Foreman
 Robert W. Hill
 William Bradford Huie
 James H. Lesar
 Albert Pepper
 Carol Pepper
 James Earl Ray
 Jerry Ray
 John Ray
 J. B. Stoner
 Harold Weisberg

15. All letters, cables, reports, memorandums, or any other form of communication concerning the proposed guilty plea of James Earl Ray.

16. All records of any information request or inquiry from, or any contact by, any member or representative of the news media pertaining to the assassination of Dr. Martin Luther King, Jr. since April 15, 1975.

17. All notes, memoranda, correspondence or investigative reports constituting or pertaining to any re-investigation or attempted re-investigation of the assassination of Dr. King undertaken in 1969 or anytime thereafter, and all documents setting forth the reasons or guidelines for any such re-investigation.

18. Any and all records pertaining to the New Rebel Motel and the DeSoto Motel.

19. Any records pertaining to James Earl Ray's eyesight.

20. Any records made available to any writer or news reporter which have not been made available to Mr. Harold Weisberg.

21. Any index or table of contents to the 96 volumes of evidence on the assassination of Dr. King.

22. A list of all evidence conveyed to or from the FBI by any legal authority, whether state, local, or federal.

23. All reports, notes, correspondence, or memorandums pertaining to any effort by the Department of Justice to expedite the transcript of the evidentiary hearing held in October, 1974, on James Earl Ray's petition for a writ of habeas corpus.

24. All reports, notes, or memorandums on information contained in any tape recording delivered or made available to the FBI or the District Attorney General of Shelby County by anyone whomsoever. All correspondence engaged in with respect to any investigation which was made of the information contained in any of the foregoing.

25. All records of any contact, direct or indirect, by the FBI, any other police or law enforcement officials, or their informants, with the Memphis group of young black radicals known as The Invaders.

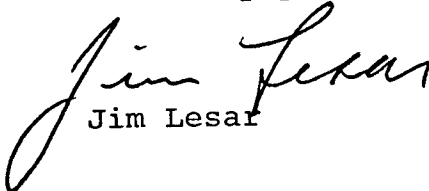
26. All records of any surveillance of any kind of The Invaders or any member or associate of that organization. This is meant to include not only physical shadowing but also mail covers, mail interception, interception by telephonic, electronic, mechanical or other means, as well as conversations with third persons and the use of informants.

27. All records of any surveillance of any kind of any of the unions involved in or associated with the garbage strike in Memphis or any employees or officials of said unions. This is meant to include not only physical shadowing but also mail covers, mail interception, interception by any telephonic, electronic, mechanical or other means, as well as conversations with third persons and the use of informants.

28. All records containing information which exculpates or tends to exculpate James Earl Ray of the crime which he allegedly committed.

This request for disclosure is made under the Freedom of Information Act, 5 U.S.C. §552, as amended by Public Law 93-502, 88 Stat. 1561.

Sincerely yours,


Jim Lesar