

Dear Jim, 75-1996 calendar call; my next affidavit; Dugan's ploy 3/27/76

Dugan's offer of a "search" of the Memphis Filed Office files and his deliberate lies yesterday are what caused me to elect the beginning of a draft of a new affidavit as we discussed it briefly yesterday. I have a guest, expect the college people, so I decided to do it piecemeal, structuring it so that I can do this in odd moments and you can go over it as it is done and avoid a last-minute pressure.

I started the enclosed while my guest was asleep. If I can mail it soon it will be the with corrections he made while I was doing the last pages.

Dugan leaves no doubt that to the head-on encounters we probably will not be able to avoid is one with him. Therefore I'm taking the initiative and laying out his personal obstruction of compliance and his personal deceptions of the judge. Let him get as angry as he wants - the more the better as long as we are on a solid factual basis. I'm simply not going to accept either the corruption of the law or the denial of my rights or the waste of my time by some authoritarian-minded Assistant United States Attorney, whether he acts on his own or in pursuance of set policy or both.

I propose following this with what is intended to introduce it, an account of the persisting non-compliance of the FBI as of the 3/23 meeting.

I'll break this into separate units you can go over separately, the meeting and the records provided. I think I'll add an allegation of defrauding me of the search fee. (what we were given is hardly the result of a \$150 search and all is supposed to have been searched for the internal "investigation.") Besides, Wiseman told me the search represented eight hours of "professional" time and that comes here to \$20 an hour rather than the rate specified in Turner's letter.

Probably I'll follow with a list of specific withholding and proof of the existence of each, enough to make an irrefutable record but less than all I know. I may restrict this to what I told Blake, Wiseman and Kilty. I'll delay this part to give you time to indicate what you may consider to be the priority items.

I think we should be prepared for as much of a "substantial compliance" effort as La Ryan and "ratt" as we can guess these characters may try on us and Green. My purpose will be to make out as much as possible of a case of no compliance. I've begun this with Kilty where it fits with Ryan's complaint and where it may attract interest in substance at the outset.

It appears to me that the way this is going, especially with the coinciding leak of a recommendation of an official re-investigation which from all indications will be limited to the existing official records, we should consider consulting with some Members of the black caucus and perhaps other black leaders.

Best,

Harold Weisberg, being duly sworn....

At the calendar call in this cause on Friday, March 26, 1976, Mr. _____ Dugan, Assistant United States Attorney, told the Court that he had been spending his time and efforts in drawing together all that is needed to ^{EFFECTUATE} ~~effectuate~~ compliance with my Complaint so that he could again move to moot the matter.

Within my personal experience this representation to the Court is as opposite Mr. Dugan's personal record and efforts as it is possible to be.

After this calendar call, as after that of February 11, I had a conversation with Mr. Dugan to the end that compliance be facilitated and completed and that there not be another Government misrepresentation to the Court.

Mr. Dugan was ill-tempered, angry, resentful and used intemperate language outside the courtroom on March 26.

I went up to him after the calendar call to offer again to make myself available at his client's convenience to facilitate this matter and to inform him that his new offer, to have a belated search made of the Memphis FBI Field Office, to my knowledge would not constitute full compliance.

As soon as I approached him Mr. Dugan exclaimed in anger that I call people liars.

My response was to assure him that ~~him~~ there had been and continued to be lies, the most recent only three days earlier, when I had specified a series of them in person to representatives of the FBI in the offices of the FBI's Legal Counsel. Of these many I specified one on which there is a prior court record, the false representation by Special Agent John W. Kilty that the results of spectrographic analysis are never represented numerically or statistically. As I had told Mr. Kilty on March 23 I told Mr. Dugan, that Mr. Kilty had personally made available precisely what he now claims is impossible, a numerical representation of the results of these tests. (See Exhibit _____)

The only alternative to this being a lie is that the covering letter by FBI Director Clarence M. Kelly ~~dated~~ dated _____ is false because that letter represents this and the other accompanying records as the result of spectroscopic examinations.

When Mr. Dugan had no response to this I reminded him of our previous conversation

about precisely these matters and his promises on that occasion, none kept and subsequently misrepresented to the Court.

My counsel, Mr. Jim Cesar, did not participate in the second conversation and in fact walked slightly ahead of Mr. Dugan and me as we went toward the elevators. I attributed this to what he had told me the night before, that Mr. Dugan had lost his self-control in a phone conversation of that day and had used unprofessional language in speaking to Mr. Cesar.

The second conversation ended with Mr. Dugan glowering at me and saying, "Aw, shit."

By February 11, rather than "drawing together" what could be done to facilitate this matter, Mr. Dugan had refused to facilitate on. Therefore, on February 11, after the calendar call, I spoke to him as I had prior to the opening of Court. Prior to the opening I personally offered him records that showed his client was misrepresenting fact. Mr. Dugan declined to receive these records ^{of his} ~~as his~~ own client. After the calendar call at which he said he would be supplying an affidavit of compliance and a motion to ~~Dismiss~~ ^{Dismiss} for mootness, I warned him the affidavit would be false and that I would have no alternative to so proving. I told him I do not ^{WANT} ~~want~~ to do this and would like to avoid the need, that he knew perhaps only what he had been told and I did not believe he would want to be in the position of suborning perjury.

On that occasion Mr. Dugan did stand and talk with Mr. Cesar and me.

These are among the points addressing compliance and the Government's representations I then made to Mr. Dugan:

1) To the Department's knowledge I ^{would} ~~was~~ pay the fees asked, as already assured in Mr. Cesar's correspondence and by my long prior record, but that I could not make out a check until told the sum. I asked him to convey this assurance to Mr. Thomas Wiseman and to ask the sum in which I should make out the check, which would then be out in the first mail. The alleged fear of my not paying had been used by Mr. Wiseman as an excuse not to deliver copies of the public information sought. In fact, despite this personal assurance to Mr. Dugan by both ^{Mr.} Cesar and me on February 11, Mr.

Dugan nonetheless later, on _____, filed what is called ~~Answers~~ ^{ANSWERS} ~~Answers~~ to my interrogatories in which the same Mr. Wiseman repeats the same false statements about payment.

2) Deputy Attorney General Tyler's letter of December 2, 1975, informed Mr. Lesar and me that other records had been collected and were available to me through Mr/ Wiseman. Mr. Wiseman had said he could not make them available on the several occasions I was thereafter going to be in Washington and had not set a time when I could make this offered examination. I asked Mr. Dugan to try to arrange for this examination on the subsequent dates I knew I would be in Washington and, as an alternative, to ask Mr. Wiseman ~~that~~ to pick any other time on which I could see what Mr. Tyler's letter promised. Mr. Dugan kept insisting "I cannot control my client," and I kept repeat^{ing} that all I was asking is that he use his ~~own~~ "good offices" to try to effectuate the written promise of the Deputy Attorney General, who I took to be Mr. Dugan's higher authority. Finally, reluctantly, Mr. Dugan promised to make the effort. On March 23, when I reported to him my conversations about this with Mr. Wiseman on March 23, Mr. Dugan grew indignant and told me "I have never talked to the man. I deal with the lawyers." I ~~then~~ had told Mr. Dugan that Mr. Wiseman told me my offer and request had never been delivered to him. The first time Mr. ^{WISEMAN} ~~Wiseman~~ told me this was by phone, the next time in the presence of Mr. _____ Blake, of the office of FBI Legal Counsel. On that occasion Mr. Blake told Mr. Lesar and me that he had not so informed Mr. Wiseman. The net result of Mr. Dugan's "good offices" and efforts to "draw together" and expedite this matter is that it was impossible for me to examine what the Deputy Attorney General ~~off~~ allegedly offered for more than three months.

February

3) On ~~March~~ 11 I asked Mr. Dugan to try to arrange for me to examine what I had already paid the required percentage of search fees on, what the Civil Rights Division has that is called for in the request and complaint. There was no further word on this from Mr. Dugan until in court on March 23 he said that these records had been compiled and would be made available in a week.

SEVERAL

Several weeks prior to ~~the~~ March 23, knowing I had obligations including medical appointments that could interfere with any date set for my examination of what the alleged searches would provide, I asked Mr. Lesar to ask Mr. Dugan to set March 23 as the date for my examination of the records the full size of only part of which has been described in official statements as close to 100 volumes each about three inches thick. Mr. Lesar had offered to have me as his guest for the period beginning March 23 so that I might be able to examine all that would be offered prior to this last calendar call. Mr. Lesar, who had to be out of town for a week, informed me that he had arranged for Mr. ^{DUGAN} ~~Dugan~~ to confirm the March 23 date with me and in fact Mr. Dugan did by phone on March 9. I then asked him to try to arrange for my examination of those records collected by the Civil Rights Division to coincide with the March 23 date with the FBI. As he did not communicate directly or indirectly with Mr. Wiseman so also did Mr. Dugan not make this arrangement with the Civil Rights Division. When on his return to Washington Mr. Lesar made the same effort with Mr. Turner, to whom my payment of search fees was sent, ~~xxxxx~~ Mr. Turner, who then had an accurate estimate of the number of pages he said were relevant, did not permit my examination of these records prior to the March 26 calendar call.

4) when Mr. Dugan, as he had told the Court, told Mr. Lesar and me on February 11 that an affidavit of mootness was being prepared and would be filed within a short period, I told him it would constitute false swearing and I was prepared to prove this without possibility of doubt. I told him I did not want to have to do this and to avoid it would do all possible to inform him and others in the Department of existing records not supplied in compliance. I also offered, when he objected to the interrogatories and the ruling of the court on them, to explain to him or to anyone else the relevance of each and every one to compliance. In further explanation of this on both March 11th and March 23 I told Mr. Dugan that I knew of files that should be searched if for some reason not consistent with the FBI's records and boasts on file keeping the records sought did not appear in Headquarters files. I also told him on both occasions that to my knowledge these records should also be found in the files of the Criminal Division

and the Civil Division. To this day there has been no word from either of these divisions ^{NOR} did Mr. Dugan mention them in court on March 26. Moreover, I also informed Mr. Dugan that some ^{Field} Filed Offices maintain files sometimes not duplicated in Washington. At the same time I informed him that to my knowledge there had been extensive shipments of cartons of records from Memphis to Washington and to the Washington FBI G Field Office in particular and that I could specify the name of the receiving agent. Yet in court on March 27 Mr. Dugan made no mention of the Washington Field Office or any other than the Memphis Field Office although he had been informed of shipments out of Memphis. ~~In fact~~ In fact if the records called for for some reason not consistent with the FBI's self-representation do not turn up in headquarters, as I offered Mr. Dugan on these several occasions I am quite prepared to specify other offices in which to my knowledge some of these records should be found.

5) From this partial record it is clear that Mr. Dugan's role has been other than that of expediter of this matter and other than that of drawing it all together.

In our meeting with Mr. Wiseman and Mr. Blake on March 23, a ~~max~~ meeting to which Mr. Wiseman later invited Mr. Kilty, I specified what was being withheld, what to my knowledge existed and is called for by the request and complaint, and received as an alleged answer only the assurance that there had been a ~~good~~ "good faith" search of which neither Mr. Blake nor Mr. Wiseman claimed any personal knowledge. There is no doubt of the non-compliance or of the specificity of my proving it on that occasion. Nor is there any on any aspect, extending even to the masking. As an example of this there is the one teletype of the many relevant ones, including some referred to in those records not withheld, a Birmingham teletype of April 5, 1968. ⁺ It is masked without reason or ~~sense~~ sense. When I first glanced at it March 23 I turned to Mr. Wiseman and told him that what was masked is common, public knowledge, the names having been published in the multimillions of copies and used in open court. He consulted his originals and agreed with me but despite the presence of a copying machine in that very office did not give me a clean copy, one not edited without justification.

On t e basic evidence of pictures of the scene of the crime, when I was assured of the ridiculous, that the FBI had none and that the file of pictures presented to me for examination was 100% of the existing pictures, I proved this false beyond question/ in both aspects: the FBI does have pictures of the scene of the crime and of other pictures and sketches called for by the request and complaint.

With regard to pictures of the scene ^{of} to the crime I truthfully reported that I knew of dozens the FBI has and am prepared to provide an identification of dozens and to describe what dozens show.

With regard to suspects I reported that even those I had personally provided the FBI did not turn up in this all~~eged~~ "good faith" search and that I am prepared to prove the existence of others. (There was no response when I reminded the representatives of the FBI that it had filed conspiracy charges in Birmingham and claimed not to have no other suspected^s-ever.)

3/27/76

Dear Bill,

Bill left for a regional K Block party in Baltimore without her key so I have to stay up to let her in. It is my bedtime these days!
I have completed the draft of the new affidavit. It is less than 13 of my pages, double spaced.

Les is coming in the morning. He is in Washington. He called me from there, he is to return to New York tomorrow so I think it will not be late when he gets here. Before or after I'll give this a hasty reading so I can mail it Monday.

You will notice that I've worked in ~~the~~ some basis for a Vaughn motion. It may not be enough or what you want. (If I have not mentioned that we haven't received either a single sheet of paper or any response of any kind from Criminal and Civil I think it should be in.)

By reference I have included only one exhibit. However, if you believe there should be others, let's include them, too. I'm not anxious to give this stuff away but I'll follow your judgement.

My hunch is that we should let them challenge, if they will, and then deliver the evidence - where it does not transfer the burden of proof to us.

It may not be possible for you by then, but I'll be in D.C. on the fifth. I have to return not later than the mid-afternoon bus because I have to make a speech that night and I'm their dinner guest. However, my GHA appointment is for 9, with a blood test to follow. I may or may not be before the Claims Committee and I may or may not have to go to court, but all of that should be over in the morning. If I can return with a revised affidavit I can go over it promptly. I should be able to return it by Wednesday, the 7th.

This is about the time we have been promised the xeroxes by Civil Rights. Unless you feel otherwise I believe it would be better to address that separately. They should have everything called for in the requests because they are now going over everything. I believe on this basis alone it may be best to address them separately, in two ways:

in terms of what they give and
with a list of what is called for that they do not find in their 3,000 inches of files.

I do not remember Dugan making any promise about when the amended request would be complied with. By now they know what I figured out on the Conitelpros/Invaders. So, I think we should expect a scrap on that. They don't dare give that kind of material up without an effort to suppress it.

Especially if they have withheld it from DJ - say Pottinger and his Civil Rights lawyers.

If you file the Vaughn motion before this and there is resistance, however they are on Conitelpros/Invaders will help. But I think it will be best to file as soon as it is possible for you. They may well destroy records.

What I think might make good exhibits is those of the recent records that refer to others not provided, with the references to the missing encircled.

Best,

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There was silence, not response, when I reported to these FBI representatives that William Bradford Huie swore to the existence of suspects. He knew that as soon as the FBI learned of what Ray had told Huie of Ray's employment there FBI was immediately there with many pictures.

Nor did it make any difference when I told these FBI representatives of still other suspects publicly reported as suspects and that I have these reports also. They merely claimed to have made a "good faith search."

The alternatives on suspects alone seem to be limited to search of the wrong files; destruction of the records; lying; or a combination. Depictions of suspects were released and published. These depictions are in the form of sketches and pictures.

When I asked where the photomicroscopic comparisons pictures are I was told they are not made. When I cited Retired Special Agent Robert Frazier's testimony to the Warren Commission about how he makes these studies I was told this was not a re-investigation of the JFK assassination. When I repeated that Frazier made these studies, had executed an affidavit on them, and his testimony before the Warren Commission was on his and the FBI's practise, I was told this also was not a trial of James Earl Ray. However, such photomicroscopic pictures were taken and were provided me - only of only that which does not cause death. There were none of that which did cause death. These just were not taken, I was told. But there is little sense in making these kinds of studies of an empty cartridge without connecting that cartridge with the bullet fired from it. "One the photomicroscopic and the scientific evidence is totally missing in what was given to me. There is the impossibility only, that with the fragment of bullet that did cause death there is no FBI testing to connect that with the empty cartridge found in the so-called "Ray" rifle or to connect it with the other found bullets. More than four years earlier the AEC, now ~~ERDA~~ ERDA "eagerly" as used the Criminal Division of the Justice Department of this, as I established in C.A. 75-226.

The same is true of the metal traces detected on Dr. King's clothing. What is represented as the total testing is the notation on sketched of the symbol for lead.

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Only lead when the bullet that caused death is composed of more than a dozen *different* metals. The identification of lead is meaningless. It is also meaningless and allows no purpose in the testing not to have ~~an~~ ^y analysis ^(with and) of the lead alloy. But none ~~was~~ ^{was} provided and I was assured that the notation of "Pb" on the sketch of Dr. King's clothing is all there is and all that was needed. This despotes the fact that the remnant of the bullet that caused death was recovered and analyzed. There is no doubt that the analysis of the traces from the clothing matched it. But providing the traces from the clothing required providing similar testing of all the samples. The hazard is that providing the full analyses risked establishing that the traces did not match other samples which would also have had to have been completely analyzed, as was done in the JFK assassination and supposedly is done in all homicide cases where there is the need for scientific testing.

Despite the contrary record in the ^{FBI} ~~FBI~~'s JFK investigation and the abundance of evidence in scientific literature, Mr. Kilty assumed that the FBI tests for merely one metal of the alloys in bullets. However, even this was not done, from what was provided - if it is to be believed - with anything that could match the traces on the King clothing.

Yet Mr. Kilty admitted that what was provided is hardly a minute ^{fraction} of what was supplied in response to the identical request for the identical ^{records} evidence in the JFK case. Nor did he or any of the others dispute that the Department has hailed the FBI's investigation of the King assassination as its second largest and second most costly. Mr. Kilty's statement is that there is no more in the FBI's files and that is ^{it} his work, he says.

To this I cited two government subsidized studies, one by our Law Enforcement Assistance Administration and the other by the Canadian Government, the results of both published in the Journal of Forensic Sciences. Mr. Kilty's sole added response was "That was by Quinn." Vincent Quinn had no connection with the Canadian study, and *both studies* specify that each individual element is identified and measured.

Without this there can be no comparison and without that no identification,
either way.

These glaring omissions ^{in what was provided} are consistent with the absence of any ^{record} of this scientific testing until long after the receipt of the evidence in the FBI laboratory - if ~~this~~ these representations are to be believed. ~~and~~ There is no single dated paper provided by Mr. Wiseman that is dated prior to the identification of James Earl Ray by FBI Agent George Bonebrake - two weeks after the crime. In the JFK case the initial FBI report of its spectrographic examinations was sent to Dallas within 24 hours of that crime.

The combination of this inordinate delay that is not accounted for in any way, the incompleteness of what has been provided and said to be complete, leads to the belief that there has been destruction and steps should be taken to prevent any or any more destruction. The alternative is lying and non-compliance.

When I made a special point that a microscopic match was alleged between the muzzle of the rifle and the wrong half of the windowsill removed from the Memphis flophouse but there were no such pictures, Mr. Kilty dove into the stack of pictures and waved one of the muzzle that had been provided by Mr. Wiseman. I told "r. Kilty there are even more of the windowsill. But how was the comparison made by those pictures and with that proof that photographs were taken through a microscope, where were the comparison pictures standard, according to the Frazier testimony? Mr. Kilty's response was that there was no need for them. These are the only ones for which there was any need. Without the comparison no purpose is served by any microscopic picture of the muzzle of the rifle. Moreover, the reports provided first show that only a special and impossible part of that muzzle- the side of all things - might have caused the alleged dent in the windowsill. This would have required the shooter to have been suspended suspended from invisible hocks to have fired the weapon.

Yet the possibility of a microscopic match is, as my earlier affidavit sets forth, what it was represented in Memphis Mr. Frazier would have sworn to- without

from what the Department and the FBI now allege, any supporting evidence when that evidence was readily available in comparison-microscope photographs - if ~~inexistent~~ he could have made that match and so testified.

This also applies to several tools recovered from what is said to be Ray's property - they are said to eliminate the possibility that they caused the one of the several dents in that windowsill from which the rifle is alleged to have been fired.

Complicating and limiting this omission even more is the flat statement in those reports initially supplied by Mr. Wiseman. They show the total absence of what had to have been present for any rifle to have been fired from that point, gunshot residues. They also show the absence of any traces of wood or window screen on the rifles that allegedly made this dent in that windowsill and allegedly pushed the screen out. Yet simple conclusions only are stated in these summary reports that also deal with other matters. No test results have been provided on any of these items, neither any "raw material" or any statement of the actual results of the tests themselves.

Not one thing necessary to support testimony or withstand cross examination was provided relating to any one of these scientific tests. Yet at one point there were only two days before a scheduled trial at which these tests were to have been testified to.

Mr. Wiseman did provide 15 pages on March 23. All of these, a total of but seven documents, relate to scientific testing of other than the cause of death. ~~However~~ For this, all of which should have been available in one or at most two files, the alleged search cost which I paid was \$144.00.

These heavily-masked pages in which what was well publicized is masked, contain repeated references to relevant records not provided. It simply is not possible to have conducted any kind of search ~~if~~ or for anyone to have reviewed the ~~result~~ of this search without knowing of all these still withheld records. The relevant communications include missing airtels and teletypes. They disclose the existence of other repositories of relevant records not searched. They disclose other files in Washington not searched or if searched, with the relevant being deliberately withheld. They also disclose that

it belatedly there were scientific tests on what is described as Ray's "personal effects." Most of these personal effects are not included. Almost none is. Nor is it indicated in this fabled FBI dedication to accuracy and precision where these personal effects came from, his person or his luggage or what he left behind in his London quarters. One item is four soiled and one unsoiled handkerchiefs. Another is a TWA note with the name "YARUM CHANDRA DUTT"(sic). This was tested for fingerprints, there was none of Ray's found on it, there was an conspiracy charge filed by the FBI prior to this date in Birmingham, and yet there is said to be no other suspect.

Nothing else relating to this Dutt was provided. Not even a record dismissing Dutt as a suspect. Or making any identification of Dutt. Or of any inquiry at TWA. Or any record seeking to establish that this Dutt was or was not the alleged Ray accomplice in a London robbery in which Ray is alleged to have had an accomplice.

While these records show that the Ray personal property was forwarded to FBI headquarters by the London Legat Attache, they make ~~virtually~~ no reference to the forwarding of any other property, and making it certain that other such records are withheld.

These few pages for which I was charged almost 10 dollars each disclose the existence of relevant records in other FBI locations if this "good faith search" in headquarters did not turn them up.

This is merely a summary of what a few pages largely masked shows to still be withheld after all this time and after assurances of compliance - six weeks after Mr. Dugan's claim of mootness. The Department and the Bureau know there is more withholding and what files were not searched. Three days before Mr. Dugan's promise to have a search made of the Memphis Field Office and it alone I informed the FBI's FOIA Officer and its representative of ~~the~~ its Office of Legal Counsel of the shipping or large quantities of evidence to the Washington Field Office. Not one newspaper - nay, not even a reference to the Washington Field Office - has been provided. There is not one sheet of paper from the Birmingham Field Office despite the filing of the conspiracy charge there.

Records

~~Evidence~~ specifically called for in this cause was delivered to the FBI in New York. Other records normal in any criminal investigation, essential in this case and existing in New York, identified in this cause, have not been provided and have not, in fact, even been referred to in any record to me, delivered. Nor has there been a single record delivered that makes any reference to what I know the FBI did receive and is described and called for in this cause.

These omissions cannot be accidental and cannot be remedied by any search, even a better than "good faith search," in the Memphis Field Office only.

This is not to say that the Memphis Field Office does not have records that are called for and have not been provided. It does. But all that is called for and has not been provided cannot possibly be in the Memphis Field Office.

When the FBI claims not to be able to find its most basic evidence and that other basic evidence does not exist even though ~~it~~ it was sworn to and a court was assured it existed and would be testified to, I believe steps should be taken to make a meaningful inventory of what the FBI has before more disappears. This appears to have importances outside this case as well. The New York Times of March ~~23~~ 24 and The Washington Post of March 25 report the third "investigation" by the Department since this request was filed. These are all of the Department investigating itself and of the FBI investigating itself. Yet both the Department and the FBI have assured this court that they do not have such basic evidence as pictures of the scene of the crime; as it fell and pictures of the position of the corpse; pictures of the dispersal of the victim's blood, both essential in any reconstruction of the crime; pictures of the evidence as found; pictures of the locale of any nature; pictures that even identify the place from which the crime is alleged to have been committed; pictures taken at any time (and published) showing whether or not it was possible to commit the crime as alleged; pictures ^(some but not all published) or ~~sketches~~ sketches of other suspects/when there was a conspiracy indictment; and either the raw material or the results of the testing of the most basic evidence, to name but some of what it is now claimed does not exist and could not be found after a "good faith search."

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When I told the Bureau's representatives on March 23 of the actual existence of these and other records I seek I was told there would not be another search to locate them because there had been this "good faith search" already, one that could not turn up even a single published picture of the scene of the crime apparently being enough.

On March 26 after the hearing I again offered to Mr. Dugan to help locate what I know the FBI had, as I had offered to the Bureau's representatives in this matter three days earlier. His reply was ~~xxxxxx~~ o four letters, "shit."

Under these circumstances I believe that the preservation of my rights under the law requires that a complete record of all the ~~xxxxxx~~ files be deposited with this court. The record to date provides no basis for believing the respondent can be trusted to determine relevance.

I also believe that the national interest requires this. If this Court has not been deceived records have already disappeared.