

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

HAROLD WEISBERG, :  
 :  
 Plaintiff, :  
 :  
 v. : Civil Action No. 78-0322  
 :  
 WILLIAM H. WEBSTER, ET AL., :  
 :  
 Defendants :

HAROLD WEISBERG, :  
 :  
 Plaintiff, :  
 :  
 v. : Civil Action No. 78-0420  
 :  
 FEDERAL BUREAU OF INVESTIGATION, :  
 ET AL., :  
 Defendants :

PLAINTIFF'S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendants are required to answer the following interrogatories under oath within 30 days.

For the purpose of these interrogatories, phrases such as "the Kennedy assassination" and "the investigation of President Kennedy's assassination" include not only the FBI's initial investigations of the murder but also any subsequent, subsidiary or ancillary investigations in any way related to this subject. For example, it includes such matters as the investigation by New Orleans District Attorney Jim Garrison, the investigation of the House Select Committee on Assassinations, and the FBI's internal probe of FBI Agent James P. Hosty, Jr.

For the purpose of these interrogatories, the term "tickler" is used in its broadest meaning and includes the definition given by the House Select Committee on Assassination--"a copy of a report that is placed in a file for the purpose of reminding the file keeper of further action," Report, p. 187, n. 5--and common dic-

tionary definitions, such as those given by Webster's New Twentieth Century Dictionary (unabridged) ("a memorandum pad, file, or other device for aiding the memory"), and Webster's Seventh New Collegiate Dictionary ("a device for jogging the memory; specif: a file that serves as a reminder and is arranged to bring matters to timely attention").

1. Did the FBI's Dallas field office create "tickler" files during the course of the investigation into the assassination of President John F. Kennedy?

2. Did the FBI's New Orleans field office create "tickler" files during the course of the investigation into the assassination of President Kennedy?

3. In response to Mr. Weisberg's Freedom of Information Act requests, did the FBI conduct a search for "tickler" files in the Dallas and New Orleans field offices? If so, please describe the search(es) made and state who made them and on what date(s).

4. Have any "ticklers" in the Dallas and New Orleans field offices been destroyed? If so, please list the records destroyed and the date(s) on which they were destroyed.

5. Please define "JUNE" AND "JUNE MAIL" as used by the FBI and list the kinds of records contained in "JUNE" and "JUNE MAIL" files or bearing such designations.

6. Do the Dallas and New Orleans field offices have any "JUNE" or "JUNE MAIL" files? If so, please state:

(a) whether such files are maintained separate from the main files;

(b) whether such files are separately indexed;

(c) the precise location in each field office where such files are kept;

(d) whether such files have been loaned or transferred elsewhere;

(e) how such records are ordered, arranged and stored.

7. Has the FBI conducted a search for any "JUNE" or "JUNE MAIL" records pertaining to the Kennedy assassination in:

- (a) Dallas field office files;
- (b) New Orleans field office files?

8. Are there any records in the FBI's "JUNE" or "JUNE MAIL" files which are not also contained in the FBI's "main" files?

9. Are all "JUNE" or "JUNE MAIL" records indexed in the FBI's Central Records index both at FBI Headquarters and in FBI field offices?

10. Were any "JUNE" or "JUNE MAIL" files created which in any way relate to the investigation into the assassination of President Kennedy conducted by New Orleans District Attorney Jim Garrison?

11. Do the Dallas and New Orleans field offices contain:

- (a) special file rooms;
- (b) SAC safes;
- (c) "Personal and Confidential" or "P&C" files;
- (d) "do not file" files;
- (e) other repositories convenient to and for use by case

agents and supervisors?

12. Has the FBI conducted a search to determine whether there are any records in the Dallas and New Orleans field offices related to the assassination of President Kennedy which repose in:

- (a) special file rooms;
- (b) SAC safes;
- (c) "Personal and Confidential" or "P&C" files;
- (d) "do not file" files;
- (e) other repositories convenient to and for use by case

agents and supervisors?

If so, please describe such searches, stating when, how, and by whom they were made.

13. Do the Dallas and New Orleans field offices have any lists, inventories or indices of films, photographs or tapes obtained during the course of the investigation into President Kennedy's assassination?

14. When FBI field offices transmitted films, photographs or tapes to FBI Headquarters, did a covering letter or memorandum accompany them?

15. When the FBI transmitted films, photographs or tapes to the Warren Commission, did a covering letter or memorandum accompany them?

16. Does the FBI consider films, photographs and tapes obtained by the Dallas and New Orleans field offices which were subsequently sent to Headquarters to be field office records or Headquarters records?

17. Did the FBI ever obtain tapes of the Dallas police radio broadcasts? If so, please state:

(a) when and how the FBI obtained these tapes;

(b) when these tapes came into the possession of the Dallas field office;

(c) where these tapes are presently located;

(d) whether any search has been made to locate the tapes;

(e) whether a covering letter or memorandum accompanied transmittal of the tapes to FBI Headquarters or the Warren Commission, and if so, the date(s) of same.

19. Describe in detail any search which has been made for the tapes of the Dallas police radio broadcasts, stating when, how and by whom any such search was made.

20. Did the FBI ever obtain films made by Thomas Alyea? If so, please state:

(a) whether a search has been made for the Alyea film and if so, when, how and by whom the search was made;

(b) where the film is presently located;  
(c) which FBI office originally obtained the film;  
(d) whether the FBI is asserting any exemption for the film;  
(e) whether there is any record reflecting the transmittal of the film to FBI Headquarters and/or the Warren commission and if so, the date(s) of same?

21. Did the following persons or organizations figure in investigations into the assassination of President Kennedy:

- (a) the Free Cuban Committee
- (b) Double Check
- (c) Alpha 66
- (d) DRE
- (e) JURE
- (f) MNR
- (g) Sylvia Odio
- (h) Carlos Bringuier
- (i) Ronnie Caire
- (j) Dean Andrews
- (k) Perry Russo?

If the FBI contends they did not, please state why not.

22. Has the FBI searched for records on any of the persons and organizations listed in the preceding interrogatory? If so, please list the date(s) on which each such search was made, the subject of the search and who made the search. Also describe in detail the nature of the search.

23. Which of the following persons and organizations does the FBI consider not to be Warren Commission critics:

- (a) Mark Lane
- (b) Harold Weisberg
- (c) Howard Roffman
- (d) Sylvia Meagher

- (e) Josiah Thompson
- (f) Jim Garrison
- (g) Joaquim Joesten
- (h) Leo Sauvage
- (i) Edward J. Epstein
- (j) Richard Popkin
- (k) Paul Hoch
- (l) David Lifton
- (m) Mary Ferrell
- (n) Earl Golz
- (o) Penn Jones
- (p) Harold Feldman
- (q) Vincent Salandria
- (r) Bernard "Bud" Fensterwald, Jr.
- (s) Hal Verb
- (t) Sylvan Fox
- (u) Robert Kafka
- (v) Nerin Gun
- (w) Herve Lamar (James Hepburn)
- (x) Willard Robertson
- (y) Cecil Shilstone
- (z) Thomas Buchanan
- (aa) Truth and Consequences
- (bb) Assassination Inquiry Committee
- (cc) Assassination Information Bureau
- (dd) Citizens Commission of Inquiry
- (ee) Citizens Committee of Inquiry?

24. Has the FBI searched for the records on any of the persons and organizations listed in the preceding interrogatory? If so, please list the date(s) on which each such search was made and the subject of the search.

21. Has the FBI searched for all records "pertaining to persons or organizations" who figured in the investigations into the Kennedy assassination regardless of whether those records are in the main files?

22. Has the FBI searched the files on all "see" references within the main files?

23. Has the FBI searched for the records referred to in Exhibits 4, 5, and 6 to the July 21, 1982 Weisberg Affidavit ("Second Weisberg Affidavit")?

24. Has the FBI searched for the relevant but undisclosed records referred to in Exhibits 7-10 to the Second Weisberg Affidavit?

25. Has the FBI searched for all records on Mrs. Marguerite Oswald?

26. Has the FBI searched for records referred to in the October 25, 1975 memorandum by the Dallas SAC which is Exhibit 11 to the Second Weisberg Affidavit?

27. Has the FBI conducted a search for the ticklers referred to in FBI file No. 105-1425, serials 166 and 174? If so, please describe the search in detail, stating when and how it was made and by whom.

28. Has the FBI conducted a search for records on Carlos Marcello and other Mafia figures investigated by the FBI, the Warren Commission, and Jim Garrison? If so, please describe the search in detail, stating when and how it was made and by whom.

29. Has the FBI searched for records on former FBI Special Agent James P. Hosty, Jr.? If so, please describe the search in detail, stating when and how it was made and by whom.

30. Is a Dallas record on James P. Hosty, Jr. filed at FBI Headquarters as file No. 67-798-3048?

31. Did the FBI search the Dallas field office files for any records on Clay Shaw or David Ferrie?

32. Do the Dallas and New Orleans field offices maintain ELSUR indices? If so, please list all subjects on which an ELSUR search was conducted in each field office and state when and by whom the search was made.

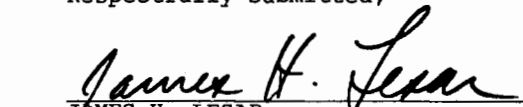
33. Subsequent to the filing of Mr. Weisberg's affidavit alleging that he had been picked up on a wiretap in New Orleans, did the FBI make any investigation to determine if this was true?

34. In regard to the further search ordered in this case by the December 16, 1980 letter of Associate Attorney General John H. Shenefield, did the FBI receive any guidelines or instructions regarding this search other than those contained in Shenefield's letter itself?

35. Were the search slips which Weisberg was furnished by the FBI in this case the original search slips? Had some or all of them been rewritten?

36. Have the answers to the foregoing interrogatories been based on the personal knowledge of the person swearing to them?

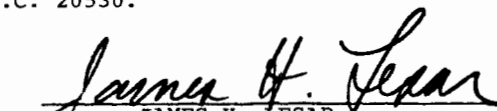
Respectfully submitted,

  
JAMES H. LESAR  
1000 Wilson Blvd., Suite 900  
Arlington, Va. 22209  
Phone: 276-0404

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of December, 1982, mailed a copy of the foregoing Plaintiff's First Set of Interrogatories to Mr. Henry LaHaie, Civil Division, Room 3338, U.S. Department of Justice, Washington, D.C. 20530.

  
JAMES H. LESAR