

Dear Jim,

3/1/83

Here is the short affidavit for the field office case. I have kept it short and simple so that it is focused and so that you can focus it even more. I want you to do something this time, not to be scared as you were with Beckwith, and above all, not to spout off and let the whole thing drop dead. There is a much different political situation and these very bad people have made bad political errors.

I want you to raise the perjury question, and with indignation, AFTER ALL THESE years, your client is being defrauded. And don't you give a damn about the sanctity of our laws and institutions. May, you need a soapbox and I sure hope you find it.

I think it is past time to move that all the defendant's declarations be expunged as falsely sworn and ~~made~~ not made of persona; knowledge in any event. Then they have no evidence, and if the judge rules against us, let us forget everything else, which will keep us in court for another decade if we don't, and go up on appeal on the simplest issues, where they can't meet the burden of proof.

And while I think you are just plain afraid and won't do it for this reason, I think it is past time for you to lay allegation on the DJ lawyers, in this case the statute referred to in Goulden's book, making it a crime to file frivolous matter. Any demand for ~~records~~ discovery pertaining to unmade searches can't be serious, particularly not with the record in this case.

You'll find other excuses and you'll tell yourself you are not afraid, and you'll again miss an exceptional opportunity.

You just have to join issue on that issue on behalf of FOIA and the effort to save it. You should be seeking attention for all of this because their records is so entirely indefensible.

Do it right and it will make Leahy an incredible hearing!!!!

With I felt better. This time I'm not having trouble on my back, as I did with the pleurisy in 1978, but this time I'm not comfortable sitting up, so I'm spending most of my time on my left side and regretting the time I don't.

When we talk again I'd like to know what need Henry has for the 200,000 pages Mark is getting. Henry ought have his book completed long before Mark has most of your records. If he is to have it out for this year, it has to be in by the end of April. Perhaps you had something in mind that isn't clear to me, but I think it will hurt him rather than help him.

Hastily,

