

Dear Paul (cc Mark Allen),

9/29/84

This evening I'm mailing Jim an affidavit I prepared after reading Laura Einstein's letter and the attached CIA document Dube swore to the need to withhold. One of the exhibits - and Mark take note to save himself and someone else trouble - is certain pages of the CIA's IG report on Castro plots triggered by a Drew Pearson column. The other few exhibits, few considering how many I could have attached, are to show that all Dube swore to as secret was in the public domain. One is a disclosed CIA record. As distinguished from a leaked one, which nonetheless is public.

I can see a number of uses for such an affidavit, as perhaps Jim also will, not only to give the court and to use in defending FOIA from CIA/ACLU. For example, on the difficulty of such litigation, bad faith, counsel fees.

Lil is retyping it so I can get it in the outgoing mail this evening, meaning a trip into town, and Groden phoned to say he is coming, so we are pressed for time. If Jim does not provide a copy, let me know and I will.

If you did not know, the FBI also disclosed copies of its interviews with Ed Morgan and related internal memos. I did not bother to search for them and merely referred to them. I've read them and probably have subject-filing copies somewhere.

They made a serious mistake, if Jim and others can make effective use of it. As I hope. And am trying to help along.

Hope you get past that 2 a.m. feeding fast!

Best to you all,