

Dear Jim (and Paul and Mark)

) 9/17/84

After you phoned and indicated that you plan to seek to take depositions, although I by then had completed the draft of the second affidavit (but hadn't read and corrected it) I made some changes with the possibility of depositions in mind. Between them, these two affidavits give the CIA problems it cannot address except with additional mendacity, and at this juncture that becomes rather dangerous for it.

Also, even after enactment of the exemption for the CIA, these can be uses for these affidavits, in and out of your litigation.

Once again I've taken each and every substantive allegation and I think demolished each one.

I was reminded, on reading all the opinions and conjectures by Dube, offered solely on the basis that he is an "intelligence officer," that I, too, was an "intelligence officer," although, never having been a spook, I've always referred instead to the fact that I was an analyst. Yup, I was of "professional" rating, fifth grade, whatever in the hell that meant before they changed all the job classifications.

There is an enormous advantage in having specific allegations in the CIA's hands before you depose any of them, particularly Dube and Page. They have no excuse then for not being able to respond to any question about any of my allegations, and they can have no honest answers.

If and when that time comes, I'll go over all of this with you, if you'd like.

This gives you an enormous opportunity! If you can avoid getting diverted and can bring yourself to interrupting every nonresponse, every digression and evasion. They characters will be like "ilty in those regards, and you'll have to cut them off whenever they answer a question you did not ask instead of what you did ask.

This also gives you an opportunity to depose friendlies, like Mc^uchee and other former officers. I'm sure, too, that they'll confirm all I say, expect, perhaps, if they lack knowledge of the specific disclosures of information to which I refer.

I doubt if Lil, who still is not well, will be able to complete this today, but I ought be able to get it in tomorrow night's mail by taking it to an~~ing~~ evening pickup box of the post office.

I think also that the fact that I executed the first affidavit before they submitted their newer ones is of importance and, absent something horrendous, ought be used as is and dated. For example, if I knew all of that before they swore to their new lies, quite obviously, with the slightest search, if any search had been necessary, they'd have known all of that and more. Be assured that all those involved were more than merely familiar with the official as well as the unofficial disclosures. What I'm driving at is, it is perhaps the best case yet of knowing and

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deliberate lying to a federal judge by the CIA, and it is magnified by the falsity, misrepresentation, evasiveness and irrelevance of their 9/~~10~~ 10 declarations.

It also was a terrible blunder for them to restrict themselves to prior disclosure to Borosage when, in fact, all was officially disclosed aside from that, as well as publicly, which at the least alerted others in the CIA as well as those directly involved in those nefarious plots.

These two affidavits really ought to turn Robinson on and if he were to explode I'll be sorry to miss it. They don't have a leg to stand on now.

I'll probably send a copy to Baraner. I'll think about it, him and others.

Gird your loins!