

JURISDICTION

1. This is an action for damages, for injunctive and declaratory relief, and for a writ of mandamus, to redress and prevent the deprivation of rights, privileges, and immunities secured to the Plaintiffs by the Constitution and the laws of the United States, and particularly by the First, Fourth, Fifth, and Ninth amendments to the United States Constitution, by 5 U.S.C. Section 552, 18 U.S.C. Sections 241 and 242, 42 U.S.C. Sections 1985(3) and 1986, 18 U.S.C. Sections 1701-1703 and Sections 2510-2520, 47 U.S.C. Section 605, 15 U.S.C. Sections 1 and 15, and 18 U.S.C. 837.

2. Jurisdiction is conferred upon this court by 28 U.S.C. Section 1331(a), by 28 U.S.C. Section 1343(1), (2), and (4), and by 28 U.S.C. Sections 2201 and 2202, and by 28 U.S.C. Section 1361. The amount in controversy exceeds \$10,000, exclusive of interest and costs.

PARTIES

3. Plaintiff Grove Press, Inc., (hereinafter referred to as Grove), a corporation organized under the laws of the State of New York, with its principal place of business in the County and State of New York, has published books of non-fiction and fiction in the United States since 1951. It has been a major domestic medium for the communication of political opinion. It published the periodical Evergreen Review from 1957 to 1973. It has distributed for exhibition within

the United States documentary, experimental and feature motion-pictures since 1964. Among the books, articles and films which Plaintiffs have published and distributed are some which oppose as immoral, illegal, or criminal United States Governmental policies and practices with which Defendants have been associated, or for which they have been responsible.

4. Plaintiff Barnet Lee Rosset, Jr. (hereinafter referred to as "Rosset") is a citizen of the United States and a resident of New York, New York. He is President of Grove Press, Inc., and has owned or managed the company since 1951. He is suing in his capacities as an individual, and as the president and a principal stockowner of Grove Press, Inc.

5. Plaintiff Fred Jordan is a citizen of the United States and a resident of New York, New York. He is an editor and share-owner of Grove Press, Inc.

6. Defendant William E. Colby is Director of Central Intelligence of the United States. He is sued in his official capacity and as an individual.

7. Defendant Robert S. Young is Freedom of Information Coordinator of the United States Central Intelligence Agency. He is sued in his official capacity and as an individual.

8. Defendant Charles W. Kane is Director of Security of the Central Intelligence Agency. He is sued in his official capacity and as an individual.

9. Defendant United States Central Intelligence Agency (hereinafter referred to as CIA) is an executive agency

of the Federal Government and was established by the National Security Act of 1947. It is authorized to collect, correlate, evaluate and disseminate intelligence information obtained from United States intelligence agencies. It is expressly prohibited by its charter from exercising police, subpoena, or law-enforcement powers or internal security functions.

10. Defendant James Schlesinger was Director of Central Intelligence for a period in 1973. He is sued both in his individual and former official capacities.

11. Defendant Richard Helms was Director of Central Intelligence from about 1966 to about 1973. He is sued in his individual and former official capacities.

12. Defendant John A. McCone was Director of Central Intelligence from about 1962 to about 1966. He is sued in his individual and former official capacities.

13. Defendant Admiral William F. Radborn was Director of Central Intelligence from April 1965 to June 1966. He is sued in his individual and former official capacities.

14. Defendant James J. Angleton was Chief of the Counterintelligence Division (CD) of the CIA from about 1954 to December 1974. He is sued in his individual and former official capacities.

15. Defendant Raymond Rocca was Deputy Chief of the Counterintelligence Division of the CIA for a period beginning prior to 1965 and ending December 1974. He is sued in his individual and former official capacities.

16. Defendant William J. Hood was Executive Officer of the Counterintelligence Division of the CIA for a period

beginning prior to 1965 and ending in December 1974. He is sued in his individual and former official capacities.

17. Defendant Newton S. Miller was Chief of Operations of the Counterintelligence Division of the CIA for a period beginning sometime prior to 1965 and ending in December 1974. He is sued in his individual and former official capacities.

18. Defendant Thomas Karamessines was the CIA Deputy Director for plans from about 1967 to about 1973. He is sued in his individual and former official capacities.

19. Defendant Richard Ober is employed on the Staff of the National Security Council. He was employed by the CIA as a liason official between Defendants Helms and Angleton for a period beginning sometime prior to 1965 and ending in December 1974. He is sued in his individual and former official capacities.

20. Defendants John Doe, Richard Roe, and Jane Doe are persons whose identities are presently unknown and who are or were employees or agents of, or under the control or guidance of Defendant CIA or other agencies of the U.S. Government.

FIRST CAUSE OF ACTION.

21. This cause of action is based on 5 U.S.C. Section 552 and seeks to enjoin Defendants Central Intelligence Agency, Colby, Young, and Kane from refusing to provide and withholding from Plaintiffs Grove and Rosset copies of all records relating to the said Plaintiffs held by Defendants and to produce and provide copies of every such record.

22. On March 17, 1975, pursuant to 5 U.S.C. Section 552 (the Freedom of Information Act, as amended), Plaintiffs by their attorneys formally requested access to all records held by Defendants CIA, Colby and Young, which mentioned or related to Plaintiffs or to incidents or events involving them. By letters dated 26 March 1975 and 8 April 1975, Defendant Young acting as the Freedom of Information Coordinator for Defendant CIA declined to furnish the requested records. By letter dated 8 April 1975, said Plaintiffs administratively appealed the denial of their request for records to the Defendant CIA's "Information Review Committee", pursuant to 18 U.S.C. Section 552(a)(b) and Section 1900.51 of Title 32 of the Code of Federal Regulations. On April 15, 1975 and May 12, 1975, Defendant Young wrote Plaintiffs' attorneys and declined to furnish the requested records on the ground, inter alia, that additional time was needed for intra-agency consultation. By letter dated June 2, 1975, Mr. Richard H. Lansdale, as Associate General Counsel of Defendant CIA, wrote Plaintiffs' attorneys regarding the status of the appeal. By letter dated June 6, 1975, Defendant Young made a partial response and partial disclosure to the Plaintiffs of records held by Defendant CIA pertaining to Plaintiffs and requested by Plaintiffs. Said partial response and release constituted a denial of release and a withholding of records comprising: the complete contents of twenty-seven (27) identified documents, portions of the contents of seven (7) other identified documents, and the complete contents of an unknown quantity of non-identified records held by Defendants Colby, Kane, and Young, and/or other unknown officials of Defendant CIA.

23. Said Defendants are holding in their custody or possession, and deliberately withholding the furnishing to

Plaintiffs of requested copies of a substantial quantity of records pertaining to the Plaintiffs, contrary to law, knowing them to be records to which Plaintiffs are entitled to have access or copies, pursuant to 5 U.S.C. Section 552.

24. The actions of said Defendants in withholding said records from Plaintiffs, on information and belief, are motivated by the desire to conceal recorded evidence of actions, undertaken by officials of Defendant CIA, the revelation of which would prove said actions to have been improper, unlawful, criminal, and/or in violation of Plaintiffs' legal and Constitutional rights. Said officials include Defendants Helms and Angleton and other persons, whose identities are unknown to Plaintiffs.

25. Defendants have no legal justification for withholding from Plaintiffs copies of said records and portions of records in their possession which formally were requested by Plaintiffs on March 17, 1975, and which were not delivered to said Plaintiffs on June 6, 1975, or to this date.

26. The acts of Defendants Colby, Young, and Kane in denying Plaintiffs access to said records were arbitrary and capricious, and in abuse of their official discretion.

SECOND CAUSE OF ACTION

27. This cause of action arises under 42 U.S.C. Section 1985(3), and is based on Defendants' conspiracy to deprive Plaintiffs of rights, privileges and immunities secured to them by the Constitution of the United States and by certain Federal Statutes.

28. For a period of years beginning not later than May 1955 with respect to Plaintiff Rosset in his capacity as owner of Grove Press, Inc., and beginning not later than November 1965 with respect to Plaintiff Grove, and continuing to the present date in both cases, the named Defendants who are present and former officials of the CIA, together with other persons whose identities are presently unknown to the Plaintiffs, did wilfully, knowingly, and with specific intent conspire and agree to deprive Plaintiffs of the equal protection of the laws, and equal privileges and immunities under the laws.

29. This conspiracy was furthered by the said Defendants' admitted establishment, maintenance, and use of a counterintelligence file of information concerning the domestic (United States) book and magazine publishing activities and motion picture distribution activities of Plaintiff Grove and concerning the personal activities and the political beliefs and associations of Plaintiff Rosset. Portions of this file were established and maintained by means of the overt collection of data from public sources and covert operations and surveillance of the Plaintiffs' domestic activities. This data was intended to be used in reference to domestic United States law enforcement and investigatory processes, or other unlawful purposes.

30. In furtherance of the objectives of said conspiracy, one or more of said Defendants or said unknown persons or their agents or employees did do or cause to be done the acts set forth below in paragraphs 31 through 42.

31. On or about November 19, 1965, a counterintelligence file was caused to be organized to collect "all available information" concerning the domestic United States book

and magazine publishing and motion picture distribution activities of Plaintiff Grove. There was cause to be collected in said file information secured by overt and covert methods of investigation and surveillance concerning Plaintiff Grove, and Evergreen Review, and specific books, articles, and films published and/or distributed in the United States by Plaintiff Grove, and Evergreen Review, and concerning the personal activities, beliefs and associations of Barnet Lee Rosset, Jr. Said file has been maintained until this date, except for records therein which, on information and belief, were secretly destroyed or removed subsequent to 1970. Said file was organized and maintained in order to investigate and evaluate Plaintiff Rosset's personal life and political beliefs and associations, and Plaintiff Grove's publishing and distribution activities in the United States, for purposes unrelated to any lawful function of Defendants, and for domestic United States internal security law enforcement purposes.

32. On information and belief, information in said file and/or evaluations based on said information regarding Plaintiff Rosset's personal life and political beliefs and associations, and Plaintiff Grove's book and magazine publishing and motion picture distribution activities, were made available... to officials within other agencies of the U.S. Government, including the Executive Office of the President and the Internal Revenue Service, and within domestic internal security law enforcement agencies, including the Civil Disturbance Unit and the Internal Security Division of the Department of Justice and the Federal Bureau of Investigation.

33. On information and belief, information from the said file was disseminated to said agencies and to other agencies and persons presently unknown to Plaintiff, with a purpose to

affect, obstruct, or restrain Plaintiff Grove's domestic United States publishing and distribution activities, and Plaintiff Rosset's political impact on domestic United States events.

34. On information and belief, in furtherance of said conspiracy, wire communications to and from the telephone installations of Plaintiffs Grove and Rosset were wilfully and knowingly caused to be intercepted, recorded, and divulged to other persons, whose identities are unknown to Plaintiffs, through the installation of electronic, mechanical, or other devices or through other means. Data obtained by the aforesaid means was collected in the said file regarding Plaintiffs, organized, maintained, and used by Defendants, as aforesaid. Said arrangements were unreasonable and unlawful and were not made in good faith reliance upon any judicial, legislative or other valid authorization.

35. On information and belief, said conspiracy was furthered by covert activities, which included acts of impersonation and disguise to "infiltrate", i.e., to actively participate and become involved in commercial and political aspects of Plaintiffs' domestic activities.

36. On information and belief, Defendants caused their agents and/or other persons whose identities are presently unknown to the Plaintiffs, who were employed by, placed in employment with, or were otherwise associated with Grove Press, Inc., or some other private organization having some relationship to Grove Press, Inc. to influence and affect Plaintiffs' managerial, editorial, and/or employment policies and actions adversely to Plaintiffs' interests. Information regarding such covert operations of "penetration" was collected in the said intelligence files regarding Plaintiffs maintained by Defendants.

37. On information and belief, there was arranged to be awarded covert financial assistance and/or contracts to private commercial book publishers who were known by said publishers and by Defendants or their agents to be in competition in one or more lines of interstate commerce with Plaintiff Grove. Such publishers included Praeger, Inc., Fodor, Inc., and others whose identities are presently unknown to the Plaintiffs. Said arrangements were made in the knowledge that economic injury or disadvantage to Plaintiffs would result, and these actions were taken in furtherance of said conspiracy.

38. On information and belief, information pertaining to Plaintiff Rosset's personal life and political beliefs and associations and Plaintiff Grove's publishing and distribution activities, collected by private companies, under classified contracts, and by U.S. Government agencies charged with domestic and internal security police and law-enforcement functions, including the FBI, was caused to be transmitted to and organized in the above-described intelligence file maintained and used by Defendants, in furtherance of said conspiracy.

39. Defendants, their agents, or persons unknown, in furtherance of said conspiracy, wilfully conducted "mail watch" and mail interception operations against Plaintiffs which included the opening and reproduction of first-class mail sent to and from the Plaintiffs. Such action was taken without proper cause or process, and for no lawful or legitimate law-enforcement purpose.

40. On information and belief, one or more agents or other persons were caused to be solicited to be employed, or otherwise participate clandestinely in Plaintiff Grove's

organization or an organization having a relationship to Grove Press, and to investigate and report on Plaintiffs' activities. Information obtained in this was was collected in the aforesaid Defendants' file on Plaintiffs, and all said actions were taken in furtherance of said conspiracy.

41. On information and belief, in 1969, Defendants arranged for the physical surveillance of, and for a forceful entry and search of the New York apartment of Bea Losito, while she was employed as Plaintiff Jordan's secretary. Information obtained in this way was collected in the aforesaid counter-intelligence file, in furtherance of said conspiracy.

42. On July 26, 1968, the offices of Plaintiff Grove were bombed by, upon information and belief, "anti-Castro Cuban exiles" whose identities are presently unknown to Plaintiffs, but who, upon information and belief, were in the employ or under the guidance or control of certain of the Defendants in connection with one or more related domestic United States operations. This action was taken in furtherance of said conspiracy and with intent to severely restrain Plaintiff Grove's publishing activities. Also at or around this time, numerous threats of bombing and similar destructive action were made against Plaintiffs Grove and Rosset by, on information and belief, said employees or agents of certain of the Defendants.

43. All of the aforesaid operations, taken in furtherance of said conspiracy, had the direct and proximate result to restrain Plaintiff Grove's publishing and distribution activities, impair Plaintiff Rosset's political and ideological expressions on public affairs, retard Plaintiffs' advancements of view and supports of actions that were opposed to, critical of, or jeopardizing to, actions and positions of Defendants and of the Administrations which employed them.

44. The aforesaid operations violated the National Security Act provision that the Central Intelligence Agency "shall have no police, subpoena, law-enforcement powers, or internal security functions." [50 U.S.C. Section 403(d)(3)].

45. The acts complained of herein were carried out by Defendants, or by agents or employees of the Defendants pursuant to: (a) an order or command by, or on behalf of, said Defendants who were or are officials of the CIA and were acting under color of federal statute, ordinance, or regulation; (b) a pattern and practice of similar or identical acts ordered or commanded by, or on behalf of, said Defendants. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without valid authorization of law; acted willingly, knowingly, and with specific intent to deprive Plaintiff of his Constitutional rights as described and enumerated below in the paragraph immediately following.

46. As a direct and proximate result of said conspiracy, and said acts done in furtherance of said conspiracy, the Plaintiffs Rosset and Grove were deprived of their rights to freedom of press, speech, assembly, and association, rights to petition for redress of grievances, right to privacy and security from unnecessary governmental intrusion, right not to be deprived of liberty without due process of law and right to the equal protection of the laws, said rights being secured to Plaintiffs by the First, Fourth, Fifth, and Ninth Amendments to the United States Constitution. Said conspiracy also violated the provisions of 42 U.S.C. Section 1985(3), and 18 U.S.C. Sections 241 and 242.

47. As a direct and proximate result of said conspiracy, and by reason of the conduct of the Defendants, and

each of them, the Plaintiffs have suffered losses of property and income in an undetermined amount estimated to be in excess of \$10,000,000.00. Additionally, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

THIRD CAUSE OF ACTION

48. This cause of action arises under 42 U.S.C. Section 1986, and is based on neglect and refusal to prevent the conspiracy described in paragraph 28 of the Second Cause of Action.

49. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 29 through 45 of the Second Cause of Action.

50. The Defendants and said other persons whose identities are unknown to Plaintiffs each had knowledge of said conspiracy and each had the power to prevent or aid in preventing the commission of the wrongs that were the object of the conspiracy.

51. Said Defendants and said unknown persons, separately and in concert, neglected and refused to prevent or to aid in preventing said wrongs wilfully, knowingly, and with specific intent.

52. As a direct and proximate result of said neglect and refusal, the Plaintiff has suffered the injuries described in paragraph 46 of the Second Cause of Action.

53. By reason of the above-described conduct of the Defendants, and each of them, the Plaintiffs have suffered damages amounting to \$250,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

FOURTH CAUSE OF ACTION

54. This cause of action arises from Defendants' overt acts of investigation and surveillance, which were in violation of Plaintiffs' Constitutional rights and privileges.

55. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 29 through 33 and 43 through 45 of the Second Cause of Action.

56. The establishment, maintenance, and use of said counterintelligence file in reference to domestic law-enforcement processes, and other aforesaid overt operations of the Defendants were in violation of Plaintiffs' rights secured by the First, Fourth, Fifth and Ninth Amendments to the United States Constitution, and were further in violation of 18 U.S.C. Section 242.

57. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

58. By reason of the above-described conduct of the Defendants, and each of them, the Plaintiffs have suffered

damages amounting to \$250,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

FIFTH CAUSE OF ACTION

59. This cause of action arises from Defendants' covert acts of investigation and surveillance, which were in violation of Plaintiffs' Constitutional rights and privileges.

60. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 35 through 45 of the Second Cause of Action.

61. The aforesaid covert operations were in violation of Plaintiffs' rights and privileges secured by the First, Fourth, Fifth, and Ninth Amendments to the U.S. Constitution, and were further in violation of 18 U.S.C. Section 242.

62. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

63. By reason of the above-described conduct of the Defendants, and each of them, the Plaintiffs have suffered damages amounting to \$250,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

SIXTH CAUSE OF ACTION

64. This cause of action arises from Defendants' unauthorized wire interception and disclosure of conversations upon the privacy of which Plaintiffs reasonably relied, in violation of Plaintiffs' Constitutional rights and privileges, and of 47 U.S.C. Section 605, 18 U.S.C. Section 242, and 18 U.S.C. Sections 2510-2520.

65. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 24 and 43 through 45 of the Second Cause of Action.

66. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights, and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

67. By reason of such conduct on the part of the Defendants, the Plaintiffs suffered damages amounting to \$250,000.00, and are each entitled to recover \$100.00 for each day of such interception, use, or disclosure of said conversations. In addition, the Plaintiffs are entitled to recover punitive and exemplary damages in the sum of \$100,000.00 from each Defendant.

SEVENTH CAUSE OF ACTION

68. This cause of action is based on Defendants' unwarranted "mail watch" and mail interception operations, which were in violation of Plaintiffs' Constitutional rights, and

were also in violation of 18 U.S.C. Sections 1701-1703, and 18 U.S.C. Section 242.

69. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 39 and 43 through 45 of the Second Cause of Action.

70. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights, and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

71. By reason of the above-described conduct of the Defendants, and each of them, the Plaintiffs have suffered damages amounting to \$250,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

EIGHTH CAUSE OF ACTION

72. This cause of action is based on Defendants' bombing of Plaintiff Grove's physical plant, and Defendants' threats of same against Plaintiffs Grove and Rosset, which actions were in violation of Plaintiffs' Constitutional rights and privileges, and were further in violation of 18 U.S.C. Section 837 and 18 U.S.C. Section 242.

73. The Plaintiffs reallege and incorporate by this reference, as if fully set forth herein, each and every allegation contained in paragraphs 42 through 45 of the First Cause of Action.

74. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights, and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

75. By reason of the above-described conduct of Defendants, and each of them, the Plaintiffs have suffered real damages amounting to \$5,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

NINTH CAUSE OF ACTION

76. This cause of action arises from Defendants' overt and covert actions taken with the purpose of injuring the business and business prospects of Plaintiffs' commercial activities by means of financial and other assistance to competitors of Grove Press, Inc.

77. The Plaintiffs reallege and incorporate by this reference, as if fully stated herein, each and every allegation contained in paragraphs 36 through 38 of the Second Cause of Action, and in paragraphs 43 through 45 of the Second Cause of Action.

78. Said actions constituted an unreasonable restraint of trade in violation of Federal Anti-Trust law, 15 U.S.C. 1. Such actions also violated 18 U.S.C. Section 242, and Plaintiffs' rights secured by the First, Fourth, Fifth, and Ninth Amendments to the U.S. Constitution.

79. Each of said Defendants, separately and in concert, acted outside the scope of his jurisdiction and without authorization of law; acted wilfully, knowingly, and with specific intent to deprive Plaintiffs of their Constitutional rights, and did thereby injure the Plaintiffs, as set forth in paragraph 46 of the Second Cause of Action.

80. By reason of the above-described conduct of the Defendants, and each of them, the Plaintiffs have suffered damages amounting to \$250,000.00. In addition, Plaintiffs are each entitled to recover exemplary and punitive damages in the sum of \$100,000.00 from each of the Defendants.

PRAYER FOR RELIEF

WHEREFORE Plaintiffs pray for the following relief:

1. That this proceeding be accorded precedence on the docket over all cases and be assigned for hearing and trial or for argument at the earliest practical date and expedited in every way, as provided for under 5 U.S.C. Section 552(a)(4)(D).
2. That Defendants Colby, Young, Kane, CIA be ordered to produce forthwith under seal and deliver to the court, copies of all records withheld by them or in their custody, pertaining to Plaintiffs.
3. That copies of all such records be examined by the court and by counsel for the Parties in camera to determine whether all said records, and if not, which said records and portions of said records are records access to which Plaintiff is legally entitled, and that copies of all said records be ordered delivered to Plaintiffs.

4. That Defendant Colby and his every successor Director of the United States Central Intelligence Agency and Defendant United States Central Intelligence Agency be permanently enjoined any investigation, evaluation, or other intelligence activity, overt and covert, and from maintaining any secret intelligence file of information, concerning the personal life and political beliefs and associations of Plaintiff Rosset and the business and communications activities of Plaintiff Grove, its officers, agents, and employees, which are manifested within the United States, and from doing any of the acts described in the Second, Third, Fourth, (Etc.) Causes of Action.

5. That reasonable attorney fees and other litigation costs reasonably incurred in the First Cause of Action be assessed against the United States, as provided in 5 U.S.C. Section 552(a) (4) (E).

6. That a written finding be issued by the court that the circumstances surrounding the withholding of records pertaining to Plaintiffs raise questions whether personnel of the United States Central Intelligence Agency acted arbitrarily and capriciously with respect to the withholding. [5 U.S.C. Section 552(a) (4) (F)].

7. That the court declare the actions of the named Defendants, as described in the Second through Ninth Causes of Action as being in violation of applicable cited statutes and of the First, Fourth, Fifth, and Ninth Amendments to the Constitution of the United States.

8. That Plaintiffs have judgement against the Defendants named in the Second through Eighth Causes of Action for compensatory, statutory, and exemplary damages payable jointly and severally by the Defendants as requested in the

Second through the Eighth Causes of Action, and judgement against Defendants named in the Ninth Cause of Action for treble damages payable jointly and severally by said Defendants, pursuant to 15 U.S. C. Section 15.

9. That a writ of mandamus be issued directing the named Defendants who are public officers, and their agents, employees, successors, privies, and all persons acting in concert with them, to prevent the commission and cover-up of such conduct or similar conduct against Plaintiffs.

10. That the court afford Plaintiffs such other and further relief as may to the court seem just.

DATED: July , 1975.

Peter Weiss

Edward de Grazia

Attorneys for Plaintiffs .