

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

JOHN J. KING,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

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67-C-518

CIVIL ACTION NO. _____

COMPLAINT

John J. King, Plaintiff, complaining of the United States of America, Defendant, alleges as follows:

1.

This is an action for compensation for the taking of property brought pursuant to Public Law 89-318; 79 Stat. 1185.

2.

Plaintiff resides in the Judicial District of Colorado.

3.

Plaintiff was and is the owner of the following weapons:

(a) One 6.5 mm. Mannlicher-Carcano rifle, with telescopic sight, Serial No. C2766, including sling and cartridge clip. (Warren Commission Exhibit No. 139)

(b) One .38 Special Smith and Wesson revolver, Serial No. V510210, Assembly No. 65248, with appurtenances. (Warren Commission Exhibit No. 143)

4.

By Publication in FEDERAL REGISTER, Vol. 31, No. 212, page 13,968, Tuesday, November 1, 1966, the Attorney General of the United States purportedly vested all right, title and

interest in the aforesaid weapons in the United States.

5.

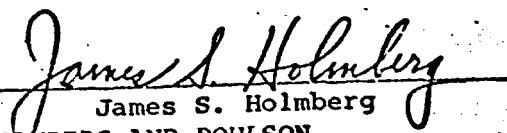
The value of the aforesaid weapons, at the time of such purported taking by the United States and continuing to the present, is \$5,000,000.

6.

In a separate action now pending against the Attorney General of the United States, Plaintiff seeks recovery of the aforesaid weapons, and in such action Plaintiff will contest the constitutionality of Public Law 89-318 and the validity and timeliness of the purported taking by the Attorney General. Plaintiff does not by this action waive his contentions in the pending action against the Attorney General but files this Complaint only to cover the possibility of an adverse decision on his right to possession of the property in controversy.

WHEREFORE, Plaintiff prays that a judgment be entered herein in favor of Plaintiff and against Defendant for \$5,000,000 and costs, and for such other and further relief as to the Court may seem proper.

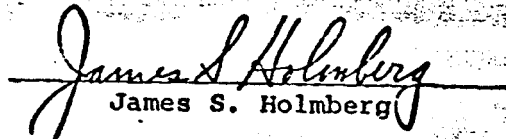
Respectfully submitted,


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Of Counsel
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JURY DEMAND

Trial by jury, as authorized by Public Law 89-318, is hereby demanded by Plaintiff in the above entitled cause.


James S. Holmberg

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