

that: 1) The District Attorney has a personal interest, then he recuses the District Attorney and appoints another attorney with the same qualifications as a district attorney to exercise the administrative powers of the District Attorney, to-wit:

- a) examine the affidavit and;
  - i) convert it into a bill of information and file same;
  - ii) refuse the affidavit and not file a bill of information;

2) If this Court determines that the District Attorney shall not have a personal interest in the affidavit; then this Court must dismiss the motion to recuse, and not disturb the functions of the present District Attorney.

Authority for each posture in this Memorandum is :

- a) ART. 385 of the Code of Criminal Procedure as to the filing of the affidavit; and procedure thereto;
- b) Art. 680(1) is the authority to file the motion for recusation of the District Attorney;
- c) Art. 681 is the procedure for recusation of District Attorney;
- d) Art. 682 is the procedure for appointing a District Attorney ad hoc should the Court recuse the District Attorney;
- e) Art. 382 is the method used by the District Attorneys to institute criminal prosecutions.

It is respectfully submitted that it is proper for this Court to contradietorily hear the motion to recuse prior to the Office of the District Attorney exercising its administrative procedure in relationship to the affidavit that supports the motion to recuse, i.e., refusing the affidavit; or accepting the affidavit, and converting it into a bill of information or presenting the matter to the Grand Jury.

Respectfully submitted:

STATE OF LOUISIANA

PARISH OF ORLEANS

CRIMINAL DISTRICT COURT

AFFIDAVIT

Be it known to all men, that DEAN A. ANDREWS, JR., in proper person, comes into the Criminal District Court, pursuant to Art. 385 of the Code of Criminal Procedure, and gives the said Court here to understand and be informed that one JIM GARRISON, late of the Parish of Orleans, on the 9th day of August, 1967, with force and arms in the Parish of Orleans aforesaid and within the jurisdiction of the Criminal District Court for the Parish of Orleans, the aforesaid Jim Garrison did then and there willfully, and intentionally, and unlawfully violate the provisions of LRS 14:123 in that he appeared as a witness in the case of State of Louisiana vs Dean A. Andrews, Jr., Number 198-483, Section "C", Orleans Parish, the matter in controversy being a "motion to recuse the District Attorney because of personal interest" (Art. 680(1), La.C.Cr.P.), and did then and there testify after being administered the oath by the proper authority, to-wit:

COUNT 1: Q. ANDREWS: Do you recall me visiting with you in your office at R-198-191 on Saturday afternoon, late, around three, three-thirty?

A. GARRISON: I recall that well, because it is more recent.

Q. ANDREWS: Do you recall me asking you whether or not you were going to put the hat on me because I had heard a rumble on the vine that I'd get the hat put on me?

THE COURT: Mr. Andrews.

ANDREWS: That's what I asked him.

THE COURT: Will you translate that into English for the record?

GARRISON: Yes, I recall that phrase now.

THE COURT: Will you explain for the record what you mean by that?

ANDREWS: That I was to be indicted for perjury, but the way I told it was the way I said it.

GARRISON: Yes, yes, I certainly do.

Q. ANDREWS: Did you make any reply?

A. GARRISON: I'm quite sure that I said, positively not, because

Count 2: And affiant herein further gives the said Court here to understand and be informed that one JIM GARRISON, late of the Parish of Orleans, on the 9TH day of August, 1967, with force and arms, in the Parish of Orleans, the aforesaid JIM GARRISON did then and there willfully, and intentionally, and unlawfully, violate the provisions of LRS 14:123, in that he appeared as a witness in the case of

STATE OF LOUISIANA VERSUS DEAN A. ANDREWS, JR.  
NUMBER: 198-483, SECTION "G" CRIMINAL DISTRICT COURT

Orleans Parish, and the matter in controversy being " A Motion to recuse the District attorney because of personal interest",  
Art 680 (1) , and did then and there testify after being administered the oath by the proper authority, as follows, to-wit:

Q. ANDREWS: (TR 198-199) " Did you at any time prior to my entering the Grand Jury Room, March 16, 1967, convey or give the impression to any of your assistants that I was lying in my testimony before the Warren Commission?

A. GARRISON: NO, that would not be necessary. I think by that time (TR 198-199) it had become apparent to most of the staff working in this area that it was.

which statements and testimony enumerated above the said JIM GARRISON then and there well knew were false and untrue, to-wit:

TESTIMONY OF RICHARD BURNES, ASSISTANT DISTRICT ATTORNEY IN THE CASE OF STATE VERSUS ANDREWS, (SUPRA)

Q. ANDREWS: (TR 135-136) To your knowledge, do you know whether or not Mr. Garrison ever expressed an opinion that I was lying in my testimony before the Warren Commission?

A. BURNES: (TR 135-136) Before I answer that Mr. Andrews, I want to say that in pointing this thing we discussed, that is not the only thing that we have discussed. So, the record shouldn't reflect that that's all that we discussed.

" ... will answer to the second question that you've asked

PAGE 3

A. BURNES: Well, inasmuch as I only discussed your testimony with him the evening before you appeared before the Grand Jury, that would be March 15th, and on the morning of March 16th, it would have had to have been one of those times.

Now, he may have expressed subsequent to that time some opinion as to whether or not you were lying, The opinion was that their inconsistent statements; that they can't all be true."

and the question propounded to JIM GARRISON and his answer thereto, related to matters material to the issue and question: to-wit:

the motion to recuse the District Attorney because of personal ~~interest~~ interest; contrary to the form of the statute of the State of Louisiana in such case made and provided and against the peace and dignity of the same;

Sworn to and subscribed before me

Dean A. Andrews, Jr.

this \_\_\_\_\_ day of \_\_\_\_\_, 1959.

---

DISTRICT ATTORNEY JIM GARRISON,  
ORLEANS PARISH, NEW ORLEANS, LOUISIANA;  
DEAN ADAMS ANDREWS - VICTIM

There appeared an article in the June 6, 1969 issue, the Red Flash edition, on page eight, section one of the States-Item Newspaper captioned "Prosecution Bar Denied Andrews". This article indicated that Andrews had been denied temporary restraining order blocking his prosecution on a perjury charge by District Attorney Garrison by United States District Court Judge James A. Comiskey.

There appears on the next page of this memorandum a copy of this newspaper article:

(Mount Clipping in Space Below)

# Dean Andrews Seeks to Bar Perjury Trial

Attorney Dean A. Andrews filed suit today in Federal District Court asking for a temporary restraining order and injunction forbidding his prosecution on a perjury charge growing out of his testimony in the trial of businessman Clay L. Shaw.

Andrews also asked a special pre-judge federal court be convened and it declare the Louisiana perjury statute unconstitutional. Defendants in the suit include District Attorney Jim Garrison, State Attorney Gen. Jack P. F. Gremillion, Gov. John J. McKeithen and Secretary of State Wade O. Martin Jr.

ANDREWS CLAIMS in the suit that for consideration of abandoning his appeal to the Louisiana Supreme Court of his conviction and 18-month sentence on a previous perjury count the district attorney offered to dismiss the pending case, which has been set for trial on June 19. The

attorney charges this bargain was offered to him through attorneys John Dowling and Michael F. Barry by Executive Asst. D. A. James Alcock.

Andrews earlier this week filed a suit in Criminal District Court charging Garrison perjured himself when he testified in Andrews' perjury trial.

IN HIS SUIT today, Andrews charged the DA's office has warned him if he goes to trial he could receive a five-year sentence and would remain in Parish Prison until an appeal by him was settled.

Andrews says in his suit he could be forced "to sit in Parish Prison a year" until an appeals court ruled on his case.

His suit alleges the DA's office is forcing him to go on trial on a perjury charge that is deemed criminal but provides no punishment under Louisiana law. He says that if found guilty, his punishment would be pronounced under a separate statute that would cause him to remain in jail for a year pending appeal.

(Indicate page, name of newspaper, city and state.)

PAGE 1

SECTION 1

THE STATES-ITEM

NEW ORLEANS, LA.

Date: 6-4-69

Edition: FINAL

Author:

GEORGE W. HEALY JR

Title:

DEAN A. ANDREWS

Character:

or

Classification:

44-3772

Submitting Office:

N.O., LA.

Being Investigated

DISTRICT ATTORNEY JIM GARRISON,  
ORLEANS PARISH, NEW ORLEANS, LOUISIANA;  
DEAN ADAMS ANDREWS - VICTIM

There appeared an article on page one, section one of the States-Item Newspaper in the June 4, 1969 final edition captioned, "Dean Andrews Seeks to Bar Perjury Trial". This article indicated that Andrews had filed a suit in Federal District Court on June 4, 1969, asking for a temporary restraining order and injunction forbidding his prosecution on a perjury charge growing out of his testimony in the trial of businessman Clay L. Shaw.

There appears on the next page of this memorandum a copy of this newspaper article:

(Mount Clipping in Space Below)

## Prosecution Bar Denied Andrews

Dean A. Andrews has been denied a federal restrainer temporarily blocking prosecution by District Attorney Jim Garrison on a perjury charge.

Judge James A. Comiskey did not rule on Andrews' plea for a preliminary injunction.

Andrews, an attorney, has also asked that a three-judge federal panel be convened and that it declare unconstitutional the state statute under which he is charged.

He was convicted of perjury in August, 1967, in connection with statements made during Garrison's investigation of the assassination of President John F. Kennedy. He was sentenced to serve 18 months.

Andrews now faces trial on June 19 on another perjury charge, and claims he is being forced to trial on a charge which is deemed criminal but for which no punishment is provided under Louisiana law. If he is found guilty he will be sentenced under a different statute.

Judge Comiskey ruled Andrews failed to allege such irreparable injury as to entitle him to the temporary restraining order.

(Indicate page, name of newspaper, city and state.)

PAGE 8

SECTION 1

STATES-ITEM

NEW ORLEANS, LA.

Date: 8-6-69

Edition: RED FLASH

Author:

Editor: GEORGE W. HEALY JR

Title:

DEAN A. ANDREWS

Character:

or

Classification: 44-3772

Submitting Office: N.O., LA.

 Being Investigated



DISTRICT ATTORNEY JIM GARRISON,  
ORLEANS PARISH, NEW ORLEANS, LOUISIANA;  
DEAN ADAMS ANDREWS - VICTIM

On June 11, 1969, an envelope bearing the return address of Andrews and Barry, Lawyers, 803 Maison Blanche Building, New Orleans, Louisiana, was received at the New Orleans Office of the FBI. Enclosed in this envelope was a letter from Andrews to the Clerk of the United States District Court at New Orleans, dated June 3, 1969, as well as a legal document filed on June 4, 1969 with the United States District Court at New Orleans.

There is set forth on the next pages of this memorandum a copy of the above described material:

June 3, 1969

Hon. Dallan O'Brien  
Clerk of Court  
United States District Court  
400 Royal St.  
New Orleans, La.

SUBJECT: Three Judge Complaint

RE: Unconstitutionality of LRS 14:124  
and injunctive relief

69-1260  
SECTION 6

Dear Mr. O'Brien:

The undersigned respectfully advises that the attached complaint is herewith tendered to your office for filing in the manner pointed out by law.

The subject matter of the complaint is the unconstitutionality of a State Statute of Louisiana, LRS 14:124, coupled with injunctive relief, pursuant to the provisions of 28 USC 2884.

We respectfully request that the Hon. United States District Judge to whom this matter be allotted to convene a three judge Court in the manner pointed out by law.

We further request that your office and the Court advance this cause on its docket in the manner pointed out by law.

We remain, with kind personal regards,

Very truly yours,

Dean A. Andrews, Jr.

DAA:dl  
cc:  
file

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
NEW ORLEANS DIVISION

CIVIL ACTION  
SECTION: XXXX  
NUMBER:

69-1260

DEAN A. ANDREWS, JR.

VERSUS

SECTION 6

JIM GARRISON, INDIVIDUALLY, AND IN HIS CAPACITY  
AS DISTRICT ATTORNEY FOR THE PARISH OF ORLEANS,  
JACK P. F. GREMILLION, INDIVIDUALLY, AND IN HIS  
CAPACITY AS ATTORNEY GENERAL, STATE OF LOUISIANA,  
JOHN McKEETHEN, INDIVIDUALLY, AND IN HIS CAPACITY  
AS GOVERNOR OF THE STATE OF LOUISIANA,  
WADE O. MARTIN, JR., INDIVIDUALLY, AND IN HIS  
CAPACITY AS SECRETARY OF STATE, STATE OF LOUISIANA

RECEIVED

JUN 1969

U. S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
DEPT. CLERK

FILED:

DY. CLERK:

TO THE HONORABLE THE JUDGES OF THE UNITED STATES DISTRICT COURT IN  
AND FOR THE EASTERN DISTRICT OF LOUISIANA, NEW ORLEANS DIVISION:

The complaint of Dean A. Andrews, Jr., of age and majority, and  
resident within the jurisdiction, with respect avers that:

1.  
The jurisdiction of this Court is invoked pursuant to Title 28,  
United States Code, Sec. 1343(3). This is a suit in equity authoriz-  
ed by Title 42, USC §1983, to be commenced by any citizen of the  
United States or other person within the jurisdiction thereof, to redr-  
the deprivation under color of law, State statute, ordinance, regulat-  
ion, custom and usage of rights, privileges, or immunities, secured  
by section 1 of the 14TH Amendment to the Constitution of the United  
States, and Title 42, USC § 1981, providing for the equal rights of  
citizens and all persons within the jurisdiction of the United  
States as as hereinafter more fully appears;

2.  
This is an action pursuant to the provisions of 28 USC 2281-  
28 USC 2283, and 28 USC 2284, and application for a three judge  
Court, pursuant and in the manner pointed out by law; further,  
injunctive relief, temporary, interlocutory, and permanent, enjoin-  
ing the defendants, their successors, agents or employees from enforc-

contradictory or inconsistent with his former sworn or affirmed statement. It shall not be necessary for the prosecution in such cases, to show which of the contradictory or inconsistent statements was false; but it shall be an affirmative defense that at the time he made them, the accused honestly believed both statements to be true.

This Article shall only be applicable where at least one of the contradictory or inconsistent statements was made in, or for use in, a judicial proceeding or a proceeding before a board or official is authorized to take testimony."

3.  
Complainant points out that the provisions of Art. 124 of Title 14 of the Louisiana Revised Statutes provides no penalty for the violation thereof; complainant further points out that through custom, usage and tradition, persons are charged by indictment or information filed the District Attorney; the defendant then goes to trial and if convicted the Court sentences the defendant under the penal provisions of Art. 123 of Title 14 of the Louisiana Revised Statutes;

4.  
Complainant specifically seeks, and/or, a interlocutory injunction or permanent injunction restraining the enforcement, operation of a State of Louisiana Statute LRS 14:124 by restraining the defendants herein for the reason that the statutory provision, LRS 14:124 is unconstitutional and specifically makes application that the matter be heard by a district Court of three judges under Title 28 USC 2284;

5.  
Complainant, pursuant to 28 USC 2284(3) herewith makes his application to the District Judge for a temporary restraining order to prevent irreparable damage to complainant for the following

2. The defendant, exercising his right to plea bargaining, advised the complaintant through, John Dowling, Esq., and Michael F. Barry, Esq., that for and in consideration of complaintant abandoning his appeal to the State of Louisiana Supreme Court, now pending, and the sentence of 18 months being served, and complaintant being disbarred, the District Attorney of Orleans parish would Nolle Prose, two open cases now pending; the plea bargaining was conveyed to the above persons through the Executive Assist. District Attorney, James Alcock.

It was further suggested that the complaintant, if he went to trial could receive 5 years sentence and while the cause would be appealable, complaintant would remain in the Parish Prison until final judgment on appeal; even though LRS 14:124 has no penal provision, complaintant would be sentenced under the penal provisions of LRS 14:123.

3. Further, complaintant would sit in Parish Prison approximately one year before the record of the proceedings would be furnished in order to move forward on the appeal;

For example, complaintant, under case # 198-483, State of Louisiana v Dean A. Andrews, Jr., was found guilty on 3 Counts of perjury, sentenced in August of 1967, and was just furnished a complete transcript in the latter part of May 1969, 22 MONTHS AFTER JUDGMENT OF CONVICTION;

4. On Tuesday, June 3, 1969, complaintant was served by the Criminal Sheriff's Office, Parish of Orleans, NOTICE OF TRIAL ON THE MERITS, SECTION "C; STATE OF LOUISIANA V DEAN A. ANDREWS, JR., for violating LRS 14:124; the trial date has been set for June 19, 1969;

complaintant has no adequate remedy at law other than these proceedings.

6.  
This action is a proceeding under Title 28, USC 2201 and 2202, for a judgment declaring the rights of the complaintant decreeing the custom, practice, policy, and usage of the Courts and District Attorneys to-wit:

1. The custom, usage, practice and policy of the District Attorney of Orleans Parish to institute a criminal prosecution via indictment or direct bill of information for an alleged violation of LRS 14:124, and prosecuting and trying a defendant for the alleged violation;
2. The custom, usage, practice, and policy of the judges having jurisdiction over the causes filed by the District Attorneys to enlarge, interpret, and sentence a defendant, should he be found guilty, under the provisions of a separate and distinct statute LRS 14:123
3. Declaring the provisions of Art. 124 of LRS Title 14 to be unconstitutional and in violation of the equal protection and due process clauses of the Constitution of the United States of America;
4. Declaring the custom, usage, practice and policy of the Courts and the District Attorneys of the State of Louisiana as set out in paragraphs one and two supra, to be unconstitutional and in violation of the equal protection and due process clauses of the Constitution of the United States of America;

WHEREFORE, complaintant prays that:

1. The defendants herein be cited and summoned in the manner pointed out by law to answer this complaint;

2. That pursuant to the provisions of 28 USC 2284(3) the District

LRS 14:124 to be unconstitutional in the manner pointed out by law;

5. That a permanent injunction issue against the defendants prohibiting the enforcement and/or prosecution of complaint Dean A. Andrews, Jr., and/or anyone under the provisions of LRS 14:124, in the manner pointed out by law;

6. Complainant herein further prays that the Court will allow his costs herein and will grant him such other, further and additional relief as may appear to this Court to be equitable and just.

Respectfully submitted,

Andrews & Barry

*Michael V. Barry*  
Michael V. Barry

*Dean A. Andrews, Jr.*  
Dean A. Andrews, Jr.  
603 Maison Blanche Bldg.  
NOLA (70112) 523-7957

PLEASE SERVE DEFENDANTS:

1. Jim Garrison, 2700 Tulane Ave, Nola
2. Jack P.F. Gremlion, 301 Loyola Ave. Attorney General's Office Room 104 New Orleans, La.
3. Wade O. Martin, Jr. State Capitol Bldg. Office of the Secretary of State, Baton Rouge, La.
4. Governor John McKeithen, Governor's Office, State Capitol Bldg. Baton Rouge, La.

ORDER

Considering the above complaint and the allegations therein contained:

IT IS ORDERED THAT A TEMPORARY RESTRAINING ORDER ISSUE FORTHWITH RESTRAINING THE DEFENDANTS, JIM GARRISON, DISTRICT ATTORNEY FOR THE PARISH OF ORLEANS, JACK P.F. GREMLION, ATTORNEY GENERAL OF THE

*Consent  
June 21  
1969*

**COURT CONVENES 10 A.M.**  
THE STATE OF LOUISIANA

8-299

**Criminal District Court for the Parish of Orleans**

To Dean A. Andrews, Jr. GREETING:

803 Maison Blanche Bldg.

You ARE HEREBY ORDERED to appear before the CRIMINAL DISTRICT COURT, SECTION

(G, for the Parish of Orleans, on Thursday next, the 19th

day of June 19 69, at 10:00 o'clock A. M., to be tried.

New Orleans, 6/2/1969

BY ORDER OF THE COURT

Edward A. Haggerty, Clerk.

Tulane Avenue and S. Broad Street

By [Signature] Deputy Clerk

Send Names and Addresses of Your Witnesses if not handed to Clerk of Court

**THIRD FLOOR**

**BRING YOUR ATTORNEY**

CRIMINAL DISTRICT COURT  
ORLEANS PARISH  
SHERIFF

JUN 2 2 35 PM '69

RECEIVED

BRING THIS NOTICE WITH YOU.



STATE OF LOUISIANA

PARISH OF ORLEANS

AFFIDAVIT OF VERIFICATION

PURSUANT TO R.S. 65(B)

Personally, before me the undersigned authority there did  
come and appear:

Dean A. Andrews, Jr.,

who after by me being first duly sworn did depose and state:

1. He is the complainant in the above numbered and captioned  
cause;
2. That the allegations set out therein are true and correct;
3. That irreparable damage will accrue, as set out in the afore-  
said complaint, unless a temporary restraining order be issued  
by the District Judge pursuant to R.S. 224(3).

Sworn to and subscribed before me

Dean A. Andrews, Jr.

this \_\_\_ day of June, 1967.

6/17/69

AIRTEL

AIRMAIL

TO: DIRECTOR, FBI (44-41893)  
FROM: SAC, NEW ORLEANS (44-3772) (P)

DISTRICT ATTORNEY JIM GARRISON,  
ORLEANS PARISH, NEW ORLEANS, LOUISIANA;  
DEAN ADAMS ANDREWS - VICTIM  
CIVIL RIGHTS  
OO: New Orleans

Enclosed for the Bureau are six copies of an LHM captioned as above suitable for dissemination.

A copy of the enclosed is also being provided to the USA's Office, New Orleans, as well as to the Departmental Attorney, Civil Rights Division, Masonic Temple Building, New Orleans.

2 - Bureau (Encls. 6) (RM)  
2 - New Orleans (2 - 44-3772)  
BMC/bak (1 - 89-69)  
(5)

BNA

*Wall*

89-69-446

DIRECTOR, FBI (44-41893)

8/12/69

SAC, NEW ORLEANS (44-3772) (C)

DISTRICT ATTORNEY JIM GARRISON,  
ORLEANS PARISH, NEW ORLEANS, LOUISIANA;  
DEAN ADAMS ANDREWS - VICTIM  
CIVIL RIGHTS

OO: New Orleans

Enclosed for the Bureau are six copies of an LHM captioned as above suitable for dissemination.

A copy of the enclosed is also being provided to the USA's Office, New Orleans, as well as to the Departmental Attorney, Civil Rights Division, Masonic Temple Building, New Orleans.

2 - Bureau (Encs. 6) (RM)  
2 - New Orleans (1 - 44-3772)  
SAC/bak (1 - 89-69)

(4) *url*

*Callahan*

89-69-4445

Serialized *ba*  
Indexed  
Filed *ba*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
NEW ORLEANS DIVISION:

CIVIL ACTION:  
NUMBER: 69-1260  
DIVISION: "G"

DEAN A. ANDREWS, JR.

VERSUS

JIM GARRISON, DISTRICT ATTORNEY, ET AL

+ + + + +

TO:

JAMES ALCOCK, ESQ.  
ASSIST. DISTRICT ATTORNEY  
2706 TULANE AVE., NOLA

HON. JOHN McKSITHEN  
Capitol Bldg. (Governor's Office)  
Baton Rouge, La.

Hon. Jack Gremlion  
Attorney Generals Office  
Baton Rouge, La.

Hon. Wade O. Martin  
Office of the Secretary of State  
Capitol Bldg. NOLA

Gentlemen:

Pursuant to the Federal Rules of Civil Procedure, take notice that the attached interrogatories are addressed to the Hon. Jim Garrison, District Attorney, Orleans Parish, and that the answers thereto are to be made under oath and served upon the plaintiff within 15 days from service hereof, pursuant to Rule 33.

Andrews & Barry

Michael F. Barry

Dean A. Andrews Jr.  
803 Maison Blanche Bldg.  
NOLA (523-3957)(70112)

CERTIFICATE

Undersigned counsel certifies that a copy of the above notice and interrogatories under Rule 33 have been served upon all defendants, by placing a copy of the above in the US Mail, postage prepaid, and addressed to: Hon. James Alcock, Assist. District Atty, 2700 Tulane Ave., NOLA; Hon. Jack Gremlion, Attorney Generals Office, Capitol

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
NEW ORLEANS DIVISION

CIVIL ACTION:  
NUMBER: 69-1260  
DIVISION: "G"

DEAN A. ANDREWS, JR.

VERSUS

JIM GARRISON, DISTRICT ATTORNEY, ET AL

+ + + + +

INTERROGATORIES PROPOUNDED BY  
PLAINTIFF TO DEFENDANT JIM  
GARRISON, PURSUANT TO RULE 33

1. Please state the facts upon which you based a conclusion to conduct a district attorney's office investigation of an alleged conspiracy to assassinate John F. Kennedy within your jurisdiction, during the year 1963, more particularly, during the months of April, May, June, July, August and September of 1963.

A. Please state the month date and year and the facts upon which you concluded and arrived at a decision to re-open and to conduct a district attorney's office investigation of an alleged conspiracy to assassinate John F. Kennedy within your jurisdiction.

B. At the time your office re-opened and began its actual investigation, Please state the facts within your knowledge & possession that:

- i) indicated the necessity of reopening your investigation;
- ii) indicated that your office had jurisdiction over the subject matter of the investigation.

2. Please state the facts upon which your office requested and obtained, pursuant to Article 66 of the Louisiana Code of Criminal Procedure, as to one Clay L. Shaw, a subpoena to appear in your office on March 1, 1967, in connection with your re-opened in-

4. Please state the facts upon which you, on or about Feb. 24, 1967, based or hand in your possession, made the following statement, in a newsconference, to-wit:

"...My staff and I solved the assassination weeks ago. I wouldn't say this if we didn't have the evidence beyond a shadow of a doubt. We know the key individuals, the cities involved and how it was done."

- A. Please name the individuals referred to in the above statement; please furnish their last known address;
- B. Please set forth the facts as related to each individual named;
- C. Please set forth the evidence and facts upon which you draw your conclusion that the evidence (facts), in the possession of your staff and yourself, was in fact "THE EVIDENCE BEYOND A SHADOW OF A DOUBT".
- D. Please state the cities referred to in the statement (supra)
- C. Please state the facts, in the possession of your staff & you, individually, on Feb. 24, 1967, as to "HOW IT WAS DONE", i.e., the assassination of John F. Kennedy.
- E. Please state the facts upon which you and your staff "solved the assassination weeks ago"; further, please state the month, date, and year that you determined that your "staff and I solved the assassination weeks ago".

5. Please state the facts, known to you and your staff, on March 1, 1967, that support the following allegations contained in the affidavit supporting an application for a search warrant of the residence of Clay L. Shaw, alias Clay Bertrand, to-wit:

- A. "Affiant has evidence that meetings were held in the apartment of David W. Ferrie at 3330 Louisiana Ave. Parkway;"
- B. "and the people present were David W. Ferrie; Clay Shaw, alias Clay Bertrand, Lee Harvey Oswald, and informant, and other persons";
- C. "The meetings were held in September, 1963, and the above individuals were discussing how they would kill John F. Kennedy, President of the United States".
- D. "At these meetings there was an agreement and combination between Clay Shaw (Clay Bertrand), Oswald, Ferrie and

statement to affiant, voluntarily submitted to sodium penthol, a drug known as truth serum, which was administered under the care, control and supervision of the coroner of the Parish of Orleans, a licensed physician."

G. "The confidential informant, while under sodium penthol, verified and corroborated and confirmed his earlier statement."

6. Please state the date, time, and place, and the names and last known address of all persons present, <sup>when</sup> Perry Raymond Russo gave the (his) statement to Louis Ivon, as alleged in the affidavit to support the application for a search warrant for the premises 1313 Dauphine Street, March 1, 1967;

7. Please state the month, day, year, place, and time Perry Raymond Russo was administered sodium penthol; further, please state the full name and last known address of each person present at the time Perry Raymond Russo allegedly verified, corroborated, and confirmed his statement to Louis Ivon; further, please state who prepared the questions propounded to Perry Raymond Russo; further, please state the last known address and full name of each person who spoke to Perry Raymond Russo during the technique commonly termed, administering sodium penthol.

8. Please state whether or not Perry Raymond Russo submitted to polygraph examination (lie detector):

A. prior to March 1, 1967; B. Between March 1, 1967 and March 14, 1967; C. Between March 17, 1967 and March 1, 1969.

If the answer to any of the above is affirmative, please state

1. The name and address, last known, of every person present;
2. the name and last known address of the person who prepared the questions used in the technique;
3. the month, date, year, time and place of each examination, and the name and last known address of the technician who administered the test;
4. the results of the examination.

9. Please state whether or not Perry Raymond Russo submitted to any

- to be propounded to Russo;
5. The length or elapse of time from the beginning of the examination until its completion;
  6. Any other material fact known to you or your office concerning the aforesaid examinations of Perry Raymond Russo.
10. Please state the facts upon which Vernon Bundy was called to your attention as to alleged knowledge of facts concerning Clay Shaw and Lee Harvey Oswald.
1. State whether or not Vernon Bundy submitted to any polygraph examination prior to his being placed on the witness stand in the "Shaw Preliminary Hearing".
  2. State the results of the examination (polygraph) of Vernon Bundy.
  3. State the month, day and year you first:
    - a) received the information that Vernon Bundy had information
    - b) the month day and year he was examined by polygraph
    - c) the month day and year you received the results of the polygraph examination;
    - d) the month day and year you placed him on the witness stand in the Shaw preliminary hearing;
    - e) state whether or not you had actual knowledge Bundy had failed the polygraph examination and was in the opinion of the polygraph operator, "LYING";
11. State the facts upon which you used Vernon Bundy as a State witness in the Shaw preliminary hearing; further, state the facts upon which you based your opinion that Bundy was a credible witness to place upon the witness stand in the Shaw preliminary hearing.
12. Please state the name and last known address of each person to whom your office caused a district attorney's subpoena to be requested from the Court under Article 66 of the Criminal Code of Procedure, in relation to your investigation of the assassination of John F. Kennedy from Jan 1, 1967 through and including July 31, 1967; FURTHER, please state the facts upon which you and your office concluded a Article 66(supra) was necessary.
13. Please state the name and last known address of each person to whom your office caused a Grand Jury subpoena to be issued in relat-



you or your staff to take the time to listen/interview the volunteer informers/alleged informants.

14. Please state the name and last known address of each volunteer person who appeared before the Grand Jury from March 1, 1967 through and including July 30, 1969 in connection with your investigation; further state the facts upon which you or your staff concluded the individual should in fact appear before the Grand Jury.
15. Please state the facts upon which you or your office caused a direct bill of information to be filed against the following persons:
  1. Manuel Garcia Conzales; 2. Eugene Bradley; 3. Gordon Novel; 4. James L. Llewellyn; David W. Ferris; Dean A. Andrews; Clay Shaw, Walter Sheridan
  2. List the docket number, the section allotted, and the statutory substantive charge alleged in each of the aforementioned informations.
16. Please state the facts as to how your office came in contact with Charles Spiessel; further state the facts upon which your office concluded he should be interviewed; state the facts upon which you or your office concluded he (Spiessel) was a competent witness for the State in the Shaw trial, further, was Spiessel tested by your office by sodium penethol, hypnosis, if so, state the facts concerning each examination.
17. State whether or not your office was aware of the instability of Charles Spiessel prior to his being placed on the witness stand in the Shaw trial; if the answer to the above is affirmative, please state the facts upon which you based your conclusion to use him as a witness; if your answer is negative, please state the facts that prevented you or your office from knowing or

- 6-
19. Please list the name and last known address of each person who was permitted by your office to "razzo", i.e., to have unlimited access/limited access to alleged evidence acquired by your office during its investigation of the assassination of JFK, for an example, Mark Laine, William Turner, et al.
  20. Please set forth the material facts that caused you and your office to apply for and to receive a D.A.' subpoena pursuant to Article 66 of the Code of Criminal Procedure as to Dean A. Andrews, Jr.
  21. Please set forth the facts that caused the issuance of the afore said subpoena (see Interrogatory 20) and Andrews appearance in your office after you personally ordered the arrest of Clay Shaw.
  22. Please set forth the facts upon which you and your office caused a grand jury subpoena to issue and be served upon Dean Andrews shortly after the arrest of Clay Shaw.
  23. Please set forth the materiality to your investigation of any of the questions propounded to Andrews in his first grand jury appearance.
  24. Please list any question propounded to Dean A. Andrews Jr., in his second grand jury appearance material to your investigation.
    1. If you list any question, please state the facts, material to your investigation, upon which the question was based.
  25. Please state the facts upon which you or your office requested a subpoena from the Grand Jury for Dean Andrews to appear on or about March 16, 1967.
  26. Please state the facts upon which "Clem Bertrand" first was brought to the attention of you or your office; further, please list the month, day, and year in which "Clem Bertrand" first came to the attention of you or your office.
  27. Please list the name and address of each contributor of funds received by your office, in connection with your investigation

29. Please state the facts upon which you based the following statements:

1. "We know from incontrovertible evidence in our possession who the real Clay Bertrand is-- and we will prove it in Court." (SEE: Playboy, page 66, column 2, Oct. 1967)
2. "...the veracity of Bundy and Russo has been affirmed not only through polygraph tests but through hypnosis and the administration of sodium amytal--truth serum." SEE: Playboy (supra) p.64 clm. 3
3. "...we have abundant documentation to corroborate their stories." (Playboy, supra, p.64 clm 3)
4. "...Andrews has lied so often and about so many aspects of this case..."
  - a) List the lies and state the facts upon which you base your conclusion the lies are in fact lies;
  - b) state the "many aspects" of the Garrison Investigation and the Shaw case wherein Andrews lied; further state the facts upon which you have drawn your conclusion that Andrews lied;
  - c) state the name and last known address of the person or persons assigned by you to conduct the questions propounded to Andrews in the Grand Jury;
  - d) state the time, i.e., month & year and day the person or persons were given this assignment; further, state what special instructions were issued or approved by you and understood by the interrogator prior to Andrews being questioned in the Grand Jury.
5. "We discovered links between David Ferrie, Lee Oswald, and Jack Ruby." (Playboy, (supra) p.74, clm.3)
6. "We discovered,....., the existence of a well organized conspiracy to assassinate John Kennedy,..." (Playboy, Supra, p.74, Clm 3)
7. "...In the New Orleans area, where the conspiracy was hatched,..." (Playboy, Supra, p.156, clm. 3)
8. "Our office has developed evidence that the President was assassinated by a precision guerilla team of at least 7 men, including anti-castro adventurers and members of the para military right."

30. Please state the name and last known address of each of your "regular staff" who was assigned to work the Garrison Investigation, a) during the months of November & December, 1963, and list the areas wherein each person named was active; further, list by name and last known address, each person who was assigned by