

A F F I D A V I T

District of Columbia }
City of Washington } SS

Harold Weisberg, being duly sworn, deposes and says:

He lives at Route 8, Frederick, Maryland.

He is a professional writer and a book publisher, now 57 years old, whose professional writing career began in or about 1930. He has been a newspaper and magazine correspondent and has been a writer, editor, research analyst and investigator for the federal government, before and during World War II, when he was cited and honored for his work by the federal government. As a consequence of some of deponent's investigative reporting in the period beginning about 1940, much praise therefor having been forthcoming from Members of both Houses of Congress, the White House, members of the President's cabinet, and even the Director of the Federal Bureau of Investigation, certain actions were taken by the federal government, including the vesting of Nazi-front corporations and the assessing of fines and penalties, in one case totaling \$160,000.

For the past almost seven years, his extensive writing and publishing has been in the field of political assassinations, especially that of the late President John F. Kennedy. The first of these books is titled **WHITEWASH: THE REPORT ON THE WARREN REPORT**. It went through four printings in the self-published original form and a like number in pocketbook reprint, the first printing alone in the latter form being of a quarter of a million copies. Beginning with his second book, **WHITEWASH II**, also mass-reprinted, most of the materials came from the National Archives, where he has been an accredited researcher since the spring of 1966. His last card of accreditation is No. 005-495. In all or in part, with materials from the National Archives, he has published an additional six books, four thus far in limited editions only, and has a number of others partly researched, partly written, or both. Unrestricted and uninhibited access to what he is entitled to under law and regulation is indispensable to this research and writing.

Deponent's writing and publishing is well-known to the federal government, including to the Defendants in Civil Action 2569-70 in the Federal District Court for the District of Columbia. Defendants have bought copies of his books, including from him. Those of Defendants' employees directly involved in the files in which he conducts research have asked him to autograph copies for them, their friends and for other employees. Among the copies bought outside of normal commercial channels by the Defendant General Services Administration, directly from deponent, are copies for the Lyndon B. Johnson Library. Additionally, deponent knows copies have been bought in commercial channels for he has personally seen them.

Deponent avers that there has been sufficient federal government interest in his writing for copies of parts of manuscripts to have been obtained, not from deponent, and to have been officially responded to prior to publication, prior even to delivery of any of the said manu-

script to the printer. By remarkable coincidence, this coincides with the non-delivery of mailed copies of the manuscript sent to a literary agent. Other proofs of federal government interest in and knowledge of Deponent's writing is in Deponent's possession, including copies of clandestine intelligence against Deponent.

Deponent's book-publishing operation is known as "Coq d'Or Press". Despite the contrary contention in paragraph 2 of Defendant's "answer" to the complaint in Civil Action 2569-70, Defendant General Services Administration paid Coq d'Or Press by check for its purchases and can produce the canceled checks deposited to the account of Coq d'Or Press.

Moreover, counsel for Defendants, the United States Department of Justice, also has certain knowledge of the truth of Deponent's statements in his complaint in Civil Action 2569-70, namely, that Deponent is a professional writer, not only because it also has copies of Deponent's books, but for many other reasons.

In Deponent's wartime writing, cited above, he worked in close collaboration with said United States Department of Justice, gave said United States Department of Justice all of the benefit of his investigations and writing, including evidence of a criminal nature and directly related to the national defense, some of which said United States Department of Justice and its agents had not been able to develop on their own.

During this writing career, well known to counsel for Defendants in Civil Action 2569-70, Deponent worked closely with three Assistant Attorneys General of the United States. On one occasion, Deponent spent four months assisting two Assistant Attorneys General in charge of the Criminal Division in the field, living with them and his expenses paid by the said United States Department of Justice, for whom at this time Deponent served as a technical consultant. Deponent's personal relations with these Assistant Attorneys General of the United States (and many other employees) were of a close and personal nature and on a basis of trust. One Assistant Attorney General even entrusted an official armored automobile to Deponent, on several occasions sending him on personal missions that, strictly speaking, in an area where alcoholic beverages were illegal, were not in accord with local law.

There have been other occasions on which Deponent, as a writer, researcher and investigator, has collaborated with the United States Department of Justice and various of its subdivisions, including by giving them files he had obtained from a subversive organization. In another case, prior to United States entry into World War II, at the behest of said United States Department of Justice, with which in his writing and investigating Deponent was then working in close collaboration, Deponent became a voluntary and unpaid agent of an intelligence service of a friendly power, namely, the United Kingdom.

For long periods of time, Deponent was on the press list of the United States Department of Justice.

Deponent affirms that, quite contrary to their misrepresentation in Paragraph 2 of the aforementioned "answer", both Defendants, the National Archives and Records Service and the General Services Administration, as well as their counsel, the United States Department of

Justice, have long known Deponent to be a professional writer and publisher. Moreover, as an editor and as a writer-investigator, Deponent has also been known, in two different cases, to the office of the United States Attorney for the District of Columbia, serving as both a witness and a source of information for the said office of the United States Attorney for the District of Columbia.

Harold Weisberg

I, _____, Notary Public in and for the District of Columbia, do hereby certify that Harold Weisberg personally appeared before me in said District of Columbia on the _____ day of November 1970, the said Harold Weisberg being personally well known to me as the person who executed the said affidavit and acknowledged the same to be his act and deed.

Given under my hand and seal this _____ day of November 1970.

Notary Public