

2/16/70

Dear Bud,

Draft of the complain, postmarked 12, arrived today.

2. Frederick County. Mail address is as you have it.

6. I do not question "acting", but I wonder if it is the word you want to use (as compared with pursuant to) because, in court, in Britain, the Missouri thing was dropped. I'm merely trying to think of the kinds of technicalities they may dream up. Do you want to add to this the description of the press, variously about 200 pages and an inch thick?

7. There was more than one hearing, if it makes any difference.

9; There are two possible dates, one that of the order and the second that of the execution of it. The order was issued 7/2. He got to Memphis before dawn the 19th.

10. Unless you know for sure they are all "originals", may I suggest something like "these copies of the supporting documents"? I am certain many were not originals, in one sense.

11. Why not add "after nos written requests had been ignored for months"

14. For various reasons, including its possible effect on the court, do you want to make reference to his "United Kingdon", corrected in this letter but still ignored by him?

After 17, do you want to add the requirement of automatic referral, Clark memo, in my recent letters? This is required of them under the law and both Departments failed to do it.

19. Want to add "and after a year of diligent effort", for I made repeated, early requests of DJ, once the new administration was in. You have them, addressed to the man who responded to my letters to Mitchell. I think, if you are in accord, it is desirable for the complaint to show that despite the intent of Congress, they first toyed with me, then evaded, then avoided, all to the end that what is required to be available not be available.

Under "Wherefore", do you want to include, after "and", "copy or", making it read, "and copy or make available for copying". If they do the copying on their own machines, they cannot raise the crap they did in "alleck's court and in response to John's complaint.

I don't know the law aspects, but this seems like a nice, quiet, moderate and considerably understated complaint. Real gentlemanly. Proper as all get-outs. Fine. Once you know when it will be filed, let us not make the mistake of the past and be ready with a press conference, as we earlier agreed.

Sincerely,