

21. Set forth the name and address of each member of the Coalition whose reputation was damaged as a result of the incidents complained of.

22. Set forth the name of each and every document that was allegedly property of the Coalition, that was unlawfully seized by the City defendants, further setting forth how such alleged seizure violated the First Amendment rights or rights of privacy of the Coalition members.

23. Set forth each and every item of special damage that the plaintiff, Coalition, will allege resulted from this incident, setting forth complete details of any such expenditures and/or losses, including to whom money has been paid as a result of the incidents complained of.

24. Set forth each and every item of conspiracy and/or surveillance, that the plaintiff will attribute to the City defendants, beyond September 22, 1981, further setting forth the specific dates, times and places relative to same and including the specific City defendants involved therein.

25. Set forth each and every allegation upon which the plaintiff will rely, in seeking injunctive relief against the City defendants.

26. With regards to the allegations contained in plaintiff's amended complaint, set forth each and every act that the plaintiff will attribute to the City defendants, relative to paragraph "6".

27. Set forth the source of plaintiff's information and the grounds for plaintiff's belief that the City defendants:

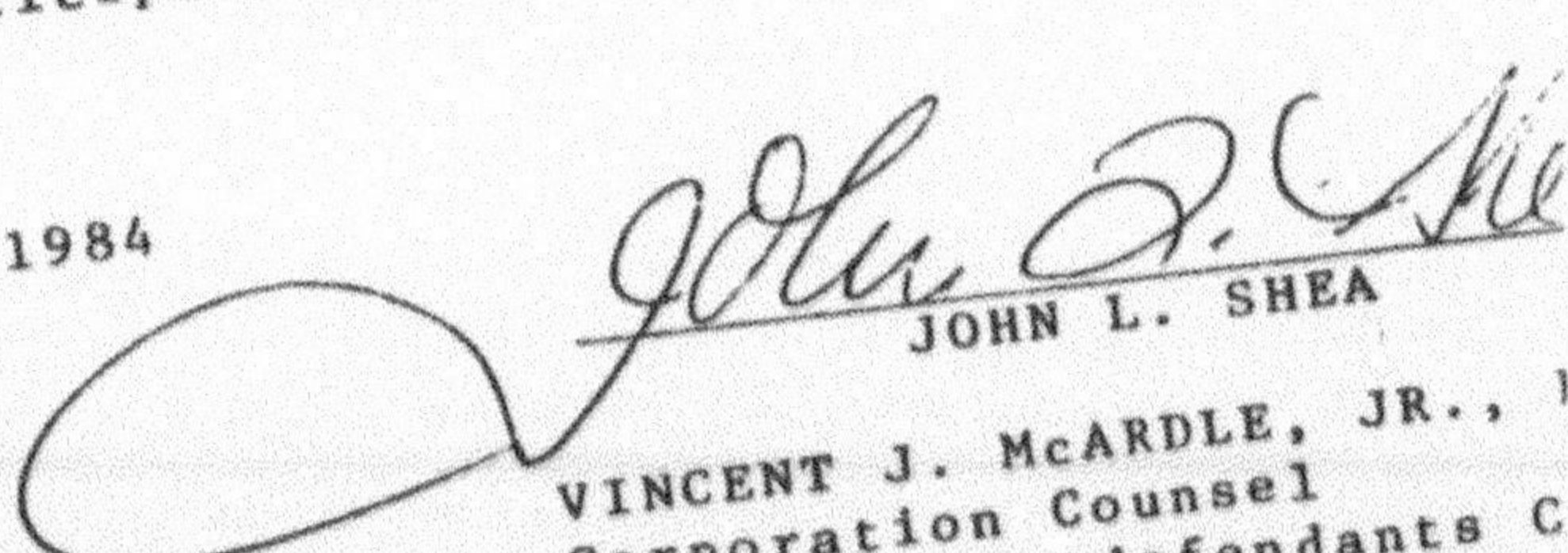
- a. Seized Coalition property, which included lists of names and telephone numbers;
- b. Made copies of such documents;
- c. Retained copies of such documents.

28. Set forth how and in what manner Coalition members are apprehensive about the alleged retention by the City defendant of membership lists, further setting forth the name and address of all such Coalition members who have been so affected.

29. Set forth how and in what manner the City defendant have specifically and wrongfully attributed to the Coalition an aura of violence, as set forth in paragraph "16" of the amended complaint.

30. Set forth fully, each and every way that members of the Coalition have been chilled into not fully and freely exercising their First Amendment rights and/or discouraged participating in Coalition activities, further setting forth the activities and/or opportunities that Coalition members been unable to participate in, since September 21, 1981, a result of same.

DATED: April 11, 1984


JOHN L. SHEA

VINCENT J. McARDLE, JR.,
Corporation Counsel
Attorney for defendants C
Burke, Reid, Murray and
City Hall
Albany, New York 12207

TO: WALTER & THAYER
Attorney for Coalition
69 Columbia Street
Albany, New York 12207

Attorneys

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JUN 3 Recd

VERA MICHELSON and CAPITAL DISTRICT
COALITION AGAINST APARTHEID AND RACISM,
by its Chairman, MICHAEL DOLLARD,

Plaintiffs,

-against-

ALBANY COUNTY DEFENDANTS'
FIRST SET OF INTERROGA-
TORIES

82-CV-1413 (Miner)

PAUL DALY, AGENT IN CHARGE, FEDERAL
BUREAU OF INVESTIGATION; JOHN J. ROSE,
SPECIAL AGENT, FEDERAL BUREAU OF
INVESTIGATION; AND UNKNOWN OTHER AGENTS
OF THE FEDERAL BUREAU OF INVESTIGATION;
UNKNOWN NEW YORK STATE POLICE OFFICERS;
ALBANY COUNTY DISTRICT ATTORNEY SOL
GREENBERG; ALBANY COUNTY ASSISTANT
DISTRICT ATTORNEY JOSEPH DONNELLY;
ALBANY COUNTY ASSISTANT DISTRICT
ATTORNEY JOHN DORFMAN; UNKNOWN OTHER
ALBANY COUNTY DISTRICT ATTORNEYS; THE
COUNTY OF ALBANY; THE CITY OF ALBANY
POLICE CHIEF THOMAS BURKE; CITY OF
ALBANY ASSISTANT POLICE CHIEF JON REID;
CITY OF ALBANY POLICE LIEUTENANT WILLIAM
MURRAY; CITY OF ALBANY DETECTIVE JOHN
TANCHAK; UNKNOWN OTHER CITY OF ALBANY
POLICE OFFICERS; and THE CITY OF ALBANY,

Defendants.

The defendants, Albany County District Attorney Sol Greenberg, Albany County Assistant District Attorney Joseph Donnelly, Albany County Assistant District Attorney John Dorfman, unknown other Albany County District Attorneys and the County of Albany (hereinafter referred to as Albany County Defendants), by their attorneys, Carter, Conboy, Bardwell, Case and Blackmore, pursuant to FRCP Rule 33, request plaintiffs, Vera Michelson, (hereinafter referred to as Plaintiff Michelson) and Capital District Coalition Against Apartheid and Racism (hereinafter referred to as Plaintiff Coalition), to answer the following interrogatories in writing within thirty days of service:

DEFINITIONS:

A. "Plaintiff"--shall mean plaintiffs or any of them, or any agent, employee or representative, including, without limitation, attorney thereof, private investigators of any nature, or any other persons, partnerships, or legal entities who are in possession of or who may have obtained information for or on behalf of the plaintiff.

B. "Documents"--shall be given the definition set forth at Rule 34 of the FRCP.

C. "Produce"--shall mean produce the documents in their original or best available form within thirty days of service of the Request herein at the office of Carter, Conboy, Bardwell, Case and Blackmore, 74 Chapel Street, Albany, New York 12207, and shall be by attaching to the answers to the interrogatories and mailing them to the above-indicated address.

D. "Identify"--with respect to documents, shall mean state the author, addressee, persons copied, date, subject matter and document character (e.g. letter, memorandum, invoice), and shall refer to documents within the possession, custody or control of those persons defined as "Plaintiff" as set forth in paragraph "A" above.

E. "Identify"--with respect to individuals, shall mean to give the name and last known residence address of such individual, and the name and address of the last known place of business where such individual was or is employed.

FAILURE TO ANSWER INTERROGATORIES UNDER RULE 33(c) OF FRCP

F. In the following interrogatories, if Plaintiffs refuse or fail to fully answer any interrogatory, electing instead to rely on the limited provision of Rule 33(c) of the FRCP, for each such interrogatory, identify with particularity precisely from which records the answer may be derived or ascertained in the volume, in numbers of documents, or the records responsive to the interrogatories, set forth a description of the burden on plaintiffs of depriving or ascertaining the answer and state why this burden would be substantially the same for Defendants, who are unfamiliar with the plaintiffs' records and the organization thereof. Also, for each of the Rule 33(c) responses made by Plaintiffs, produce each and every index, catalogue, and other record which lists any records which plaintiffs offer to produce under Rule 33(c) of the FRCP.

FORM OF ANSWERS

G. The answers to these interrogatories are to be numbered by the plaintiffs in the manner whereby the number of the answer corresponds with the number of the interrogatory, and the same instructions apply to sub-paragraphs of each interrogatory and your answers.

SUPPLEMENTAL ANSWERS

H. Pursuant to FRCP 26(e), these interrogatories shall be deemed continuing and Plaintiffs are required to supplement their responses or answers in the event that new or additional information is acquired and such supplemental information is to be supplied within fifteen days of the receipt thereof.

INTERROGATORIES

1. Please state full name, date of birth, residential address and current ^{superior - OMBDD} employment of plaintiff, Vera Michelson.

2. Set forth all acts and omissions of the Albany County Defendants which the Plaintiff Michelson will claim violated their right to privacy and association.

3. Set forth all acts and omissions by the Albany County Defendants which the Plaintiff Michelson will claim constituted unreasonable searches and seizures.

4. State all acts and omissions by the Albany County Defendants which the Plaintiff Michelson will claim violated due process of law under the Fourth, Fifth and Fourteenth Amendments of the U.S. Constitution.

5. State all acts and omissions by the Albany County Defendants which the Plaintiff Michelson will claim violated equal protection of the law under the Fourteenth Amendment of the U.S. Constitution.

6. If the Plaintiff Michelson will claim that the application for a search warrant referred to in Plaintiff Michelson's first cause of action was illegal and/or improper, please state in what manner it will be claimed that said application was illegal and/or improper.

7. If it will be claimed that the warrant application was deliberately false, misleading and perjurious, please specify all ways in which it was.

8. If it will be claimed by the Plaintiff Michelson that the search warrant, referred to in the Plaintiff Michelson's first cause of action, was illegally and/or improperly obtained, executed and/or enforced, please stated in what manner said warrant was illegally and/or improperly obtained, executed and/or enforced.

9. As to the incident referred to in paragraph "46" of the complaint, please specify:

- a. The exact time and location of the alleged incident;
- b. The names and addresses of the individuals who occupied the premises at the time of the incident;
- c. The names and identification, if known, of the individual officers involved; *this is in manuscripts of Mike + John*
- d. List all items and value thereof of personal property which Plaintiff Michelson will claim were broken and/or destroyed; *Drawers broken but my brother fixes -
phon. tape recorder busted*
- e. State the specific manner in which entry to plaintiff's apartment was obtained including the substance of any conversations between the occupants of the apartment and the officers; *John J.S. had my key - Cops got it from him?*

10. If it will be claimed that any individuals were arrested as a result of the incident described in paragraph "46" of the complaint, please state:

- a. Names and addresses of those arrested and/or detained;
- b. Manner in which those individuals were detained;
- c. Where those individuals were detained;

- d. The exact length of detention;
- e. Specify the charges at the time of arrest.

11. If it will be claimed that the Plaintiff Michelson's person, was searched when she was first detained, please state:

- a. Location where search was conducted; *matron - at the apartment while crossing - at court?*
- b. Name or means of identifying each person conducting the search;
- c. The extent of the search;
- d. What, if anything, was found as a result of the search;
- e. Whether permission to conduct the search was given, and if so, by whom and to whom;
- f. Whether all articles, if any, which were found as a result of the search were returned, and if not which articles.

12. If it will be claimed that the Plaintiff Michelson's premise was searched, please state:

- a. Location of property searched;
- b. Name or means of identifying each person conducting the search; *transcripts - mail*
- c. Extent and area searched;
- d. What, if anything, was found or confiscated as a result of the search;
- e. List any property which Plaintiff Michelson will claim was damaged as a result of the search; *List drawn type machine*
- f. Whether permission to conduct the search was given, and if so by whom and to whom;
- g. Whether all articles, if any, which were found as a result of the search were returned, and if not which articles were not returned.

13. State whether it will be claimed that the Plaintiff Michelson sustained any personal injury as a result of the actions alleged. If so, please state:

- a. The nature and extent of all personal injuries claimed;
- b. State which, if any, injury will be claimed to be permanent;
- c. Please list the names and addresses of all physicians and hospitals who treated the Plaintiff Michelson for the injuries sustained herein, including the date of any treatment.

14. If it will be claimed that Plaintiff Michelson suffered injury as a result of the incident herein to her employment, please state:

- a. Where she was employed; *OMRDD*
- b. Salary; *18,070*
- c. Time lost as a result.

15. As to the allegations of conspiracy in paragraphs "50" and "51" of the complaint, please state:

- a. All acts and omissions of the Albany County Defendant which constituted a conspiracy;
- b. The names and identities of all individuals who participated in the alleged conspiracy;
- c. List all actions taken as a result of the conspiracy.

16. As to Plaintiff Michelson's second cause of action, please state: The time and date the items of personal property were seized.

17. Please state the name and identities of the individual or individuals who seized Plaintiff Michelson's property.

18. List all property alleged to have been removed from Plaintiff Michelson's apartment.

19. If it will be claimed that not all items were returned, please list all items not returned.

20. If demands for the unreturned property have been made, please state:

- a. To whom said demands were made;
- b. In what form said demands were made;
- c. The exact dates and times of these demands;
- d. The response, if any, to said demands.

21. State all acts and omissions of the Albany County Defendants which allegedly deprived Plaintiff Michelson of her right to counsel in violation of the Sixth and Fourteenth Amendments of the U.S. Constitution. *was arraigned without an attorney*

22. State all acts and omissions of the Albany County Defendant which allegedly deprived Plaintiff Michelson of her right to reasonable bail as guaranteed by the Eighth Amendment of the U.S. Constitution.

23. State all acts and omissions of the Albany County Defendants which deprived the Plaintiff Michelson of liberty without due process of law guaranteed by the Fifth and Fourteenth Amendments of the U.S. Constitution.

24. State all acts and omissions of the Albany County Defendants, which deprived the Plaintiff Michelson of her right to freedom of speech and association under the First and Fourteenth Amendments of the U.S. Constitution.

25. State all acts and omissions of the Albany County Defendants which deprived Plaintiff Michelson to her right to equal protection of laws guaranteed by the Fourteenth Amendment of the U.S. Constitution as allege in Plaintiff Michelson's third cause of action.

26. State the date, time and place of the arrest alleged in paragraph "61" of the complaint.

27. State the names or identification presented by the arresting officers. ?

28. State the nature of the conversation, if any, that occurred at the time of the arrest. Include the identities of the participants of said conversation.

29. Will the Plaintiff Michelson claim that any physical restraints or physical force was used at the time of the arrest. If so, please state:

- a. Nature of physical restraint; *handcuffs*
- b. Nature of physical force exerted;
- c. By whom physical force was exerted.

30. As a result of the arrest, where was the Plaintiff Michelson detained and by what means was the Plaintiff Michelson transported there and by whom. *Albany*

31. Please specify as to exact time, location, persons present, conversations had where by the Plaintiff Michelson was booked. *2 cops on + off -*

*Said they knew my brother - etc -
Albany was the violence coming from
my reputation as a civil rights leader -*

32. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was photographed.

33. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was fingerprinted.

34. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was given gun powder tests. *at city lock up*

35. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was handcuffed to a table. *Cafe - 2 cops - my brother - where violence coming from my reputation*

36. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was interrogated about her political activities and plans for the demonstration.

37. Did Plaintiff Michelson at any time request an attorney, if so:

- a. State the names and identities of those to whom this request was made;
- b. State the response to said demands.

38. State the amount of time Plaintiff Michelson will claim she was confined at the Albany City Police Division II lock-up prior to her arraignment. *4.00 AM - 9.00 AM*

39. Did the Plaintiff Michelson request the use of a telephone, if so:

- a. How often; *almost every 1/2 hour*
 - b. To whom were said requests made; *diff. cops and the nation watching the cell - 2 matrons*
 - c. State the response to said requests. *From different shifts*
40. Please state if the Plaintiff Michelson was

represented by counsel at the arraignment alleged at paragraph "64" of the complaint. If so: *NO*

- a. Please state the name and address of counsel;
- b. If Plaintiff Michelson retained counsel when and by what means, i.e. phone call, direct contact; *call from Campbell?*
- c. If counsel was retained by one other than the Plaintiff Michelson, by whom and when;
- d. When was Plaintiff Michelson's first contact or conversation with counsel as to the incident herein.

41. Please state whether Plaintiff Michelson or counsel requested bail be set. If so:

- a. To whom;
 - b. When.
42. Please state whether bail ^{*NO*} was set, and if so:
- a. When was bail set;
 - b. How much bail was set;
 - c. Was bail posted.

43. Please state the details of the arraignment alleged in paragraphs "64" through "67" of the complaint.

Include:

- a. Time, place, court and Judge;
- b. Names of the officers present;
- c. Names of all counsel present;

- d. The section of law plaintiff Michelson was charged with violating.

44. Upon arraignment where will the Plaintiff Michelson claim she was removed to. Include:

- a. Means of removal and transportation; *Car 2 cops*
b. Whether physical restraint was used;
c. Time of arrival at facility; *Handoff 11:00 AM?*
d. Identification of officers involved in removal.

45. State the exact length of time the Plaintiff Michelson will claim she was confined to the Albany County Jail.

46. State the date and time of Plaintiff Michelson's release from the Albany County Jail.

47. State the reasons for which the Plaintiff Michelson will claim she was released from the Albany County Jail.

48. As to the allegation in paragraph "68" of the complaint, please state:

- a. To whom Assistant District Attorney Joseph Donnelly recommended bail be set; ~~to~~
b. The amount of the bail recommended;
c. If the recommendation was oral, state to whom the recommendation was made and the nature of the conversation;
d. If the recommendation was in writing, to whom was it directed, state the nature of the demand and annex a copy.

49. State the conditions under which the Plaintiff Michelson was released, include whether bail was set and if any conditions were place upon Plaintiff Michelson's behavior or activities.

50. Please state the disposition of the charges against the Plaintiff Michelson.

51. If the charges were dismissed, please state:

- a. When;
- b. By whom;
- c. In what proceeding;
- d. Any conditions imposed as a result of dismissal;
- e. Name and address of any counsel who represented Plaintiff Michelson on the defense of charges;
- f. Name of any District Attorney or representative who prosecuted said charges.

52. If the Plaintiff Michelson was convicted of any of the charges, please state:

- a. Date and place of conviction;
- b. Name or designation of trial court;
- c. Charges on which Plaintiff Michelson was tried;
- d. Plea to each charge;
- e. Finding of the court and the punishment imposed.

53. State in full the nature of the First Amendment rights involved in the incident herein, include the manner in which the exercise of said right was violated.

54. State the names and address of all who had knowledge of the alleged violation of the Plaintiff Michelson's First Amendment rights.

55. List all, if any, speeches or public talks by topic and date which would have been given by the Plaintiff Michelson from September 22, 1981 to the present but for the acts of the defedants herein. *Sept 22 - 2:00? - Henry*

Case-465-2400
56. State the manner in which the failure to give said speeches or public talks was related to the acts of the Albany County Defendants. *see Scott Walker - 1982*

57. State the manner in which the Plaintiff Michelson was deprived of her liberty without due process.

58. State the manner in which this deprivation of liberty was related to the acts of the Albany County Defendants.

59. State the manner in which the Plaintiff Michelson was deprived of counsel as alleged in paragraph "71" of the complaint.

60. State the manner in which the Plaintiff Michelson's alleged deprivation of counsel was related to the acts of the Albany County Defendants.

61. State the manner in which the Plaintiff Michelson was deprived of her right to reasonable bail as alleged in paragraph "71" of the complaint.

62. State the manner in which this deprivation is related to the acts of the Albany County Defendants.

63. State whether it will be claimed that the Plaintiff Michelson sustained any personal injury as a result of the actions alleged in the Plaintiff Michelson's third cause of action. If so, please state:

- a. Nature and extent of personal injury;
- b. State which, if any, injuries will be alleged to be permanent;
- c. Please list the names, addresses and dates of treatment of all physicians and hospitals who treated the Plaintiff Michelson for the injuries alleged.

64. State all acts and omissions of the Albany County Defendants which the Plaintiff Michelson will allege constituted the conspiracy alleged in Plaintiff Michelson's fourth cause of action.

65. State the names and identification of all those alleged to have participated in the alleged conspiracy described in Plaintiff Michelson's fourth cause of action.

66. State what the Plaintiff Michelson will claim was the alleged purpose, nature, reason for the alleged conspiracy.

67. Describe in detail any and all actions which the Plaintiff Michelson were done in continuance and as a result of the conspiracy herein alleged. Please include:

- a. Names of individuals involved in acts;
- b. Dates and times of acts;
- c. Nature of acts;
- d. Results of any acts.

68. Describe the policy alleged in the Plaintiff Michelson's fourth cause of action. Please include:

- a. Nature of policy;
- b. Individuals who instituted and propounded said policy;
- c. How said policy was executed and enforced;

- d. Result of enforcement of said policy;
- e. Whether it will be claimed said policy was illegal and/or improper, and if so, how.
- f. Names and identities of those who participated in the enforcement of said policy.

69. State the Plaintiff Michelson's constitutional rights allegedly violated by the policy of the City and County of Albany as alleged in Plaintiff Michelson's fourth cause of action.

70. State the manner in which the policy of the City and County of Albany and alleged conspiracy violated the Plaintiff Michelson constitutional rights.

71. State the manner in which this violation is related to the Albany County Defendants.

72. State all acts and omissions of the Albany County Defendants which constituted gross negligence as described in the Plaintiff Michelson's fifth cause of action.

73. State each and every manner in which it will be alleged that the defendants, Albany County and Sol Greenberg, did not exercise reasonable diligence to prevent said acts and things as alleged in paragraph "79" of the complaint.

74. State each and every way in which the defendants, Sol Greenberg and the County of Albany, were grossly negligent in failing to provide adequate supervision for their employees, agents and officers as alleged in paragraph "80" of the complaint.

75. State the manner in which the violation of the Plaintiff Michelson constitutional rights was related to the acts of the defendants, Sol Greenberg and Albany County, in failing to exercise reasonable diligence and being grossly negligent in improperly supervising their subordinates.

76. State the specific constitutional rights the Plaintiff Michelson will claim were violated as a result of the acts of the defendants as alleged in Plaintiff Michelson's fifth cause of action.

77. State each and every way in which the Plaintiff Michelson will claim the Albany County Defendants acted with malice.

78. State each and every act of the Albany County Defendants which the Plaintiff Michelson will claim were carried out with reckless disregard of the Plaintiff Michelson's rights.

79. What, if any, criminal proceedings will the Plaintiff Michelson claim were instituted against her as a result of the acts of the Albany County Defendant and form a basis for Plaintiff Michelson's seventh cause of action. Please include:

- a. The nature of all charges;
- b. Name or designation of trial court;
- c. Plea to each charge;
- d. Disposition of all charges;
- e. Name and address of all counsel who represented the Plaintiff Michelson;
- f. Name of all counsel who prosecuted said charges.

80. State all acts or omissions of the Albany County Defendants Plaintiff Michelson will claim were done in malice and without probable cause in prosecuting the Plaintiff Michelson on the aforesaid charges.

81. State what, if any, improper purpose the Plaintiff Michelson will claim the Albany County Defendants had in prosecuting the aforesaid charges.

82. As to the allegations of abuse of process set forth in paragraphs "88" and "89" of the complaint, please specify:

- a. All the personal papers and documents which the Plaintiff Michelson will allege were confiscated;
- b. The place, time and date upon which said papers and documents were confiscated;
- c. The names and identities of the individuals confiscating said papers and documents;
- d. Whether consent was given for the confiscation of said documents and papers and if so, by whom and to whom.

83. Please specify the process or proceeding which the Plaintiff Michelson will claim was wrongfully used by the Albany County Defendants.

84. Please state all acts or omissions of the Albany County Defendants which the Plaintiff Michelson will claim constituted the wrongful use of the process or proceeding described above.

85. Set forth all acts or omissions of the Albany County Defendants which the Plaintiff Michelson will claim confined or restrained the Plaintiff Michelson against her will.

86. To what area will the Plaintiff Michelson claim the Plaintiff Michelson was restrained and/or confined by the Albany County Defendants.

87. State the times, dates and occasions on which the Plaintiff Michelson will claim the Plaintiff Michelson was unlawfully arrested, restrained and/or detained.

88. State the duration of any confinement the Plaintiff Michelson will claim and specify the names and identities of those who restrained or detained the Plaintiff Michelson.

89. Set forth the acts or omissions of the Albany County Defendants which the Plaintiff Michelson will claim restrained, detained and/or arrested her by invalid use of legal authority.

90. Will the Plaintiff Michelson claim that physical force or restraints were used by the Albany County Defendants in order to restrain, detain or arrest the Plaintiff Michelson. If so, please specify:

- a. The manner and amount of force used;
- b. The type of restraint used;
- c. The individuals administering the restraints and/or force;
- d. The dates, times and places where the physical force and restraints were administered.

91. State the name and address of the individual answering on behalf of the Plaintiff Coalition.

92. Please state the nature and structure of the Plaintiff Coalition, including:

- a. Type of structure (i.e. corporation, partnership);
- b. Date of organization;
- c. Founder;
- d. Address of coalition;
- e. List names and addresses of officers, directors, shareholders, partners, members, trustees, associates;
- f. Please annex copies of any of the coalition's charter; by-laws; rules and regulations; partnership agreements; agreements; documentation which in any way provides for the operation of the Plaintiff Coalition, or states the purpose for said coalition;
- g. List all the coalitions subsidiaries; affiliates and/or parent organizations.

93. As to the demonstration referred to in paragraph "98", please specify:

- a. Where the demonstration was to take place;
- b. Date and time of demonstration;
- c. Number of participants expected;
- d. Names and addresses of organizers of said demonstration;
- e. Expected duration of demonstration.

94. What will the Plaintiff Coalition allege constituted "proper permission" as referred to in paragraph "98" of the plaintiff's complaint.

95. Describe the meetings referred to in paragraph "99" of the complaint, including:

- a. Dates and times of the meetings;
- b. Names of all present at the alleged meetings;
- c. Nature of discussions at said meetings;
- d. Annex copies of any agreements, documents or memoranda produced as a result of said meetings.

96. Describe the "strategy" referred to in paragraph "101" of the complaint, including:

- a. Names and identities of participants in strategy;
- b. Acts and omissions which constituted alleged strategy.

97. State each and every act of alleged deliberate and gross disregard for truth by the Albany County Defendants, including:

- a. Names of those alleged to have acted on behalf of the Albany County Defendants;
- b. Names of public officials untrue information distributed to;
- c. Name and association of press individual involved;
- d. How untrue information was distributed to public at large;
- e. Exact statements of untrue information;
- f. If any writings evidencing the untrue information distributed exist, please identify and annex said writings.

98. State each and every act by the Albany County Defendants alleged performed to advise owner of commercial establishment of expected violence, including:

- a. Names of representatives of Albany County Defendants involved;
- b. Names of individuals and commercial establishments to whom information was conveyed;
- c. Manner in which information conveyed. If writing, identify and annex copy.

99. State all occasions on which the coalition and its members were harassed, followed subject to surveillance by the Albany County Defendants. Please specify:

- a. The names of the coalition members involved; *for*
- b. Dates and times of the alleged occurrences;
- c. Places of the alleged occurrences.

100. State the manner in which the reputation of the Plaintiff Coalition was damaged.

101. State the manner in which the damaged reputation of the coalition is related to the acts or omissions of the Albany County Defendants.

102. State the manner in which the coalition and its members were deprived of equal protection of the law.

103. State the manner in which the coalition's deprivation of equal protection of the law is related to the acts of the Albany County Defendants.

104. State the manner in which the Plaintiff Coalition was deprived of equal privileges and immunities under the law.

105. State the manner in which the acts of the Albany County Defendants are related to the deprivation of the Plaintiff Coalition equal privileges and immunities under the law.

106. State the manner in which the Plaintiff Coalition was deprived of the right to freedom of speech and association.

107. State the manner in which the acts of the Albany County Defendants related to the Plaintiff Coalition deprivation of the right to free speech and association.

108. State each and every way in which the Plaintiff Coalition will allege its rights under the First and Fourteenth Amendment of the U.S. Constitution were violated.

109. State each and every way in which the acts or omissions of the Albany County Defendants related to the violation of the Plaintiff Coalition rights under the First and Fourteenth Amendments of the U.S. Constitution.

110. Describe in detail the incident referred to in paragraph "112" of the complaint, specify:

- a. The date, time and place of the alleged seizure;
- b. Identify all documents alleged to have been seized;
- c. Names and/or identities of all individuals acting on behalf of the defendants;

- d. Names and addresses of all individuals present other than representatives of defendants;
- e. What, if any, property has not been returned to Plaintiff Coalition.

DATED: June 2, 1983

Yours, etc.

CARTER, CONBOY, BARDWELL,
CASE AND BLACKMORE

BY S/ Susanna L. Fisch
Susanna L. Fisch
(An associate of the firm)

Attorneys for Albany County
Defendants
Office and P.O. Address
74 Chapel Street
Albany, NY 12207
Phone: (518) 465-3484

TO: WALTER & THAYER, ESQS.
Attorneys for Plaintiffs
Office and P.O. Address
69 Columbia Street
Albany, NY 12207

FREDERICK J. SCULLIN, JR.
United States Attorney
Attorney for Federal Defendants
Office and P.O. Address
U.S. Courthouse
100 S. Clinton Street
Syracuse, NY 13260

ALAN S. KAUFMAN
Assistant Attorney General
Attorney for State of New
York Defendants
Office and P.O. Address
State Capitol
Albany, NY 12223

JOHN L. SHEA
Assistant Corporation Counsel
Attorney for City of Albany
Defendants
Office and P.O. Address
100 State Street
Albany, NY 12207

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

The complaint

VERA MICHELSON, and CAPITAL DISTRICT
COALITION AGAINST APARTHEID AND RACISM,
by its Chairman MICHAEL DOLLARD,

Plaintiffs,

-against-

PAUL DALY, AGENT IN CHARGE, FEDERAL BUREAU
OF INVESTIGATION; JAMES J. ROSE, SPECIAL
AGENT, FEDERAL BUREAU OF INVESTIGATION;
AND UNKNOWN OTHER AGENTS OF THE FEDERAL BUREAU
OF INVESTIGATION; UNKNOWN NEW YORK STATE POLICE
OFFICERS; ALBANY COUNTY DISTRICT ATTORNEY SOL
GREENBERG; ALBANY COUNTY ASSISTANT DISTRICT
ATTORNEY JOSEPH DONNELLY; ALBANY COUNTY ASSIS-
TANT DISTRICT ATTORNEY JOHN DORFMAN; UNKNOWN
OTHER ALBANY COUNTY DISTRICT ATTORNEYS; THE
COUNTY OF ALBANY; THE CITY OF ALBANY POLICE
CHIEF THOMAS BURKE; CITY OF ALBANY ASSISTANT
POLICE CHIEF JON REID; CITY OF ALBANY POLICE
LIEUTENANT WILLIAM MURRAY; CITY OF ALBANY
DETECTIVE JOHN TANCHAK, UNKNOWN OTHER CITY OF
ALBANY POLICE OFFICERS, and THE CITY OF ALBANY,

Defendants.

COMPLAINT

Civil No.

TRIAL BY JURY
DEMANDED

STATEMENT OF CASE

1. Plaintiff, Michelson alleges that on or about 3:00 a.m., on September 22, 1981, her apartment at 400 Central Avenue, Albany, New York, was unlawfully raided and invaded by certain defendants and approximately ten (10) to twenty (20) other local, state, federal, and unknown law enforcement officers who burst into her apartment, while she was sleeping, with shotguns drawn and weapons pointed, ransacked her apartment, confiscated her personal papers and property and papers and documents belonging to the Capital District Coalition Against Apartheid, and placed

her and two (2) houseguests under arrest. Plaintiff was arrested for two (2) petty offenses and incarcerated at Albany County Jail thereby preventing her from participating in, organizing, and leading an anti-apartheid demonstration scheduled for that afternoon to protest the playing of a game by the Springbok Rugby Team from the apartheid country of South Africa. The violation charges against plaintiff were subsequently dismissed.

2. Plaintiff Capital District Coalition Against Apartheid and Racism (hereinafter "Coalition"), alleges that it was the local initiator of a lawful march and assembly in Albany, New York, on September 22, 1982 to protest the staging of a rugby game between a local team and the South African Rugby Team. Throughout the organizing effort, prior to and during the September 22, 1981 demonstration, the defendants individually and together violated the right of the Coalition and its members to peacefully assemble by, but not limited to, the following: spreading false rumors of violence, disseminating unfounded threats to would be participants and supporters, placing the Coalition and its leaders and/or members under surveillance, maintaining records and files of first amendment activities of the Coalition and its members, and arresting plaintiff Vera Michelson, a leading civil rights activist and well-known Coalition leader on the morning of the planned demonstration. The actions of the defendant significantly interfered with the demonstration planned by the Coalition and damaged the reputation of the Coalition and its members as peaceful, law-abiding citizens.

JURISDICTION

3. This action is brought pursuant to 42 U.S. §1983, §1985, §1986, and §1988, and the First, Fourth, Fifth, Eighth, Ninth, Tenth and Fourteenth Amendments to the United States Constitution. Jurisdiction is founded upon 28 U.S.C. §1331 and 1343 and the aforementioned statutory and constitutional provisions. Plaintiff further invokes the pendent jurisdiction of this Court to hear and decide claims under the laws of New York State. Timely notice has been given to defendants pursuant to State law. All claims, alleged herein, remain unpaid and unadjusted.

PARTIES

4. Plaintiff Michelson is a thirty-six (36) year old woman who is a resident of the City of Albany, County of Albany, State of New York.

5. Plaintiff Capital District Coalition Against Apartheid and Racism is an unincorporated association whose chairman is Michael Dollard. The Coalition was formerly known as the Capital District Coalition Against Racism. The P.O. Box and Address of the Coalition is P.O. Box 3002, Albany, New York 12203

6. Defendant Paul Daly is a Special Agent of the Federal Bureau of Investigation.

7. Defendant James J. Rose is an Agent in charge of the Albany Office of the Federal Bureau of Investigation.

8. Defendant Sol Greenberg is the District Attorney of the County of Albany and an employee, officer and agent of the County of Albany.

9. Defendant Joseph Donnelly is an Assistant District Attorney of the County of Albany and an employee, officer, and agent of the County of Albany.

10. Defendant John Dorfman is an Assistant District Attorney of the County of Albany and an employee, officer and agent of the County of Albany.

11. The defendant County of Albany is a municipal corporation under the laws of New York State with its principal office in Albany County, State of New York.

12. Defendant Thomas Burke is the Police Chief of the City of Albany Police Department.

13. Defendant Jon Reid is the Deputy Police Chief of the City of Albany Police Department.

14. Defendant William Murray is a Lieutenant in the Albany City Police Department.

15. Defendant John Tanchak is a Detective in the Albany City Police Department.

16. Defendant City of Albany is a municipal corporation under the laws of New York State with its principal office in the City of Albany, County of Albany, State of New York.

17. All unknown other defendants were New York State Police Officers or were Albany County Assistant District Attorneys or were Albany City police officers.

18. Each and every defendant is being sued individually and in his or her official capacity.

19. Each and every defendant was acting in his or her capacity as stated and in conspiring with other defendants.