

deposition of Vera Michelson attached hereto as Exhibit A.

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

ANSWER 32. See answer to Interrogatory #31.

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

ANSWER 33. See answer to Interrogatory #32.

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

ANSWER 34. Plaintiff was not ever told by any law enforcement officer that she was given a gun powder test but she learned she had such a test from her attorney after she had described this procedure to her.

No specific conversation is recalled by the plaintiff.

35. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was handcuffed to a table.

ANSWER 35. See answer to Interrogatory #31.

36. Please specify as to the exact time, location, persons present, conversations had whereby the Plaintiff Michelson was handcuffed to a table.

ANSWER 36. See answer to Interrogatory #31.



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;

ANSWER a. Plaintiff requested a phone call so she could contact her attorney. She made this request to the booking officers, other officers, the matron and Judge Thomas Keegan.

b. State the response to said demands.

ANSWER b. The requests were denied.

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.

ANSWER 38. Approximately six (6) hours.

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

a. How often;

ANSWER a. Numerous times

b. To whom were said requests made;

ANSWER b. The booking officers, other officers, the matron, and HOnorable Thomas Keegan

c. State the response to said requests.

ANSWER c. The responses included: the officer is not at his desk, don't worry about it, you can have as many calls as you want, no, not now, etc.

40. Please state if the Plaintiff Michelson was represented by counsel at the arraignment alleged at paragraph "64" of the complaint. If so:



a. Please state the name and address of counsel;  
ANSWER a. Plaintiff was not represented by counsel at the arraignment.

b. If Plaintiff Michelson retained counsel when and by what means, i.e. phone call, direct contact;

ANSWER b. Plaintiff left a message for attorney Anita Thayer at a neighbor's late on the morning of September 22, 1981 Attorney Thayer called plaintiff on the afternoon of September 22, 1981 at the jail. During this telephone call attorney Thayer agreed to represent plaintiff.

c. If counsel was retained by one other than the Plaintiff Michelson, by whom and when;

ANSWER c. Not applicable

d. When was Plaintiff Michelson's first contact or conversation with counsel as to the incident herein.

ANSWER d. The afternoon of September 22, 1981 by telephone.

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

a. To whom; b. When;

ANSWER a. Supreme Court Judge Edward S. Conway signed a writ of habeas corpus on September 23, 1981 returnable September 24, 1981 before Honorable Joseph Harris.

42. Please state whether bail was set, and if so:

a. When was bail set;  
b. How much bail was set;  
c. Was bail posted.



ANSWER 42. On September 24, 1981 Judge Harris of Albany County Court directed that plaintiff Michelson be released on her own recognizance.

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

a. Time, place, court and Judge;

ANSWER a. Albany Police Court, approximately 9:00 a.m. on September 22, 1981, Judge Thomas Keegan.

b. Names of the officers present;

ANSWER b. The names of the officers present are not now known to plaintiff.

c. Names of all counsel present;

ANSWER c. None to plaintiff's knowledge

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

ANSWER d. Possession of Marijuana, New York Penal Law §221.05 and Possession of Fireworks, New York Penal Law §270.00.

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

a. Means of removal and transportation;

ANSWER a. Automobile to Albany County Jail

b. Whether physical restraint was used;

ANSWER b. Plaintiff does not recall whether she was handcuffed during this period.

c. Time of arrival at facility;

ANSWER c. Approximately 10:00 a.m.

d. Identification of officers involved in removal.

ANSWER d. This information is not now known to Plaintiff.



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

ANSWER 45. Plaintiff was detained at Albany County Jail for about forty-seven (47) hours.

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

ANSWER 46. Plaintiff was released on September 24, 1981 at or about 10:00 a.m. from Judge Harris' courtroom.

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

ANSWER 47. On September 24, 1981 Judge Harris ordered plaintiff released. He stated that he knew plaintiff had ties in the local community and that he knew plaintiff as she had previously been a witness in his courtroom.

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;

ANSWER a. Honorable Joseph Harris.

b. The amount of the bail recommended;

ANSWER b. Plaintiff cannot now recall the amount of bail recommended. This recommendation should be available from the defendant's own files.

c. If the recommendation was oral, state to whom the recommendation was made and the nature of the conversation;

ANSWER c. Oral, to Judge Harris. Mr. Donnelly stated that the reasons for his recommendation were the seriousness of the charges and that his office had evidence of an uncharged crime.



d. If the recommendation was in writing, to whom was it directed, state the nature of the demand and annex a copy.

ANSWER d. Not applicable.

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

ANSWER 49. Plaintiff was released on her own recognizance.

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

ANSWER 50. They were dismissed.

51. If the charges were dismissed, please state:

a. When;

ANSWER a. December 8, 1981

b. By whom;

ANSWER b. Judge Thomas W. Keegan

c. In what proceeding;

ANSWER c. People of the State of New York v. Vera Michelson

d. Any conditions imposed as a result of dismissal;

ANSWER d. No

e. Name and address of any counsel who represented Plaintiff Michelson on the defense of charges;

ANSWER e. Anita Thayer, 69 Columbia Street, Albany, New York 12202.

f. Name of any District Attorney or representative who prosecuted said charges.



ANSWER f. The Assistant District Attorney representing the People on December 8, 1981 by Michael Katzer.

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

ANSWER 52. Plaintiff Michelson was not convicted of any charge.

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.

ANSWER 53. Plaintiff Michelson was an active participater in the planning by the Coalition Against Apartheid for a major demonstration of national significance scheduled for September 22, 1981 in Albany, New York. As a result of the above-described actions of various defendants plaintiff was unable to fulfill her liason role with those on the pre-game picket line and others engaged in planning activity on September 22, 1981; she was unable to speak as planned at a rally on SUNY Albany scheduled for the afternoon of September 22, 1981; she was unable to participate in the September 22, 1981 demonstration and thereby denied an opportunity to make her personal statement against the representatives of apartheid South Africa who were in Albany only on that day. Her detention denied her an opportunity to solicit Coalition membership from those attending the rally and to meet and hear many nationally known speakers assembled for the demonstration. Further her detention and her pending charges interfered with her efforts to participate in organizing efforts for a demonstration against a subsequent planned Springbok game.



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

ANSWER 54. E. J. Josey, 12-C Old Hickory Drive, Albany, New York

Michael Dollard, 243 Mt. Hope Drive, Albany, New York

Frank Fitzgerald, 655 Washington Avenue, Albany, New York

Scott Wexler, (planned SUNYA engagement) address to be provided

William Robinson, address to be provided

Aaron Estis, for address see Answer to #9b

Numerous other Coalition members and others.

All readers of the Time-Union, Knickerbocker News, and Schenectady Gazette.

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 defendants herein.

ANSWER 55. The only speaking engagement scheduled by plaintiff at the time of her arrest was scheduled for Tuesday, September 22, 1981 on the New Campus of SUNY Albany at a rally that "kicked-off" the student feeder march to the demonstration.

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.

ANSWER 56. The Albany County defendants were by their own



acts and the acts of their co-conspirators responsible for plaintiff's detention during the time of the above-scheduled speech.

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

ANSWER 57. See answers to Interrogatories #2 through #8.

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

ANSWER 58. See answers to Interrogatories #2 through #8.

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

ANSWER 59. See answer to Interrogatories #4, 37, 38 and 39.

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

ANSWER 60. Plaintiff Michelson was denied access to counsel in furtherance of a conspiracy between County defendants and others to keep her off the street during the September 22, 1981 demonstration.

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.

ANSWER 61. At plaintiff's arraignment no bail was set by Judge Keegan and she was remanded to Albany County Jail.



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

ANSWER 62. Plaintiff Michelson was denied bail in furtherance of a conspiracy between the defendants and others. Specifically, Assistant Attorney John Dorfman made a recommendation of "no bail" at plaintiff's arraignment.

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:

ANSWER 63. See answers to Interrogatory #13. Interrogatories a through c. of this number are not applicable.

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.

ANSWER 64. All acts stated in the complaint by all defendants are alleged to be in furtherance of or as a result of the conspiracy. All acts of County defendants alleged in the complaint are alleged to be in furtherance of or as a result of the conspiracy between and among all defendants and others.

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.

ANSWER 65. See answer to Interrogatory #15b.



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

ANSWER 66. The purpose of the conspiracy was to remove certain political activists from the street at all costs prior to the planned September 22, 1981 demonstration and rugby game to discourage participation in the demonstration, and to promote an aura of violence around the planned demonstration.

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.

ANSWER 67. Certain acts are described in detail in the complaint and in the answers to the above interrogatories. Other acts of the defendants are not now known to plaintiff.

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.



ANSWER 68. See Complaint, Allegation #73. Further details of this policy will not be known to plaintiff until certain planned discovery is completed.

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.

ANSWER 69. Rights under the U. S. Constitution: First Amendment, Fourth, Fifth, Sixth, Eighth and Fourteen Amendments.

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

ANSWER 70. The conspiracy of the defendants violated plaintiff Michelson's rights in that she was subject to an illegal search, arrest without probable cause, suffered the illegal seizure of personal property, illegal detention, and other violations as detailed throughout the Complaint and Answers to Interrogatories.

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

ANSWER 71. As participator in a conspiracy, the County defendants are responsible for the acts of other conspirators as well as their own acts.

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.

ANSWER 72. Albany County defendants were grossly negligent in failing to prevent numerous illegal acts which could have been



prevented by the exercise of reasonable diligence, e.g. reasonable diligence could have prevented a search warrant application based on perjury, and lacking probable cause, illegal search of plaintiff's apartment, arrest of plaintiff, the illegal detention of plaintiff, etc.

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.

ANSWER 73. Had these defendants exercised reasonable diligence, Assistant District Attorney Joseph Donnelly would not have participated in the drafting of an illegal and perjurious search warrant and Assistant District Attorney John Dorfman would not have made a recommendation for "no bail" in denigration of New York Criminal Procedure Law § 530.20. On information and belief defendants did not exercise reasonable diligence in other ways not now known to plaintiff.

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.

ANSWER 74. See answer to Interrogatory #73.

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.



5

ANSWER 75. See answer to Interrogatory #73.

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.

ANSWER 76. See answer to Interrogatory #64.

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

ANSWER 77. The acts alleged in the complaint were done intentionally and for the purpose of interfering with the exercise of plaintiff's constitutional rights. See complaint.

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.

ANSWER 78. See answer to Interrogatory #73.

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;

ANSWER a. See answer to Interrogatory #43d. Both these charges are violations.

b. Name or designation of trial court;

ANSWER b. Albany City Police Court.



c. Plea to each charge;

ANSWER

c. not guilty

d. Disposition of all charges;

ANSWER

d. Dismissed

e. Name and address of all counsel who represented the plaintiff Michelson;

ANSWER

New York

e. Anita Thayer, 69 Columbia Street, Albany,

f. Name of all counsel who prosecuted said charges.

ANSWER

f. Honorable Sol Greenberg by John Dorfman, Joseph Donnelly and Michael Katzer.

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.

ANSWER

80. This question will be answered when plaintiff completes certain planned discovery.

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

ANSWER

81. These charges against plaintiff were prosecuted in continuance of a conspiracy to keep certain political activists off the street during the September 22, 1981 demonstration.

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 Plaintiff Michelson will allege were confiscated;



ANSWER

- a. See Exhibit B attached to the complaint
- b. The place, time and date upon which said papers and documents were confiscated;

ANSWER

b. Subsequent to 3:00 a.m. on September 22, 1981 at 400 Central Avenue, Apt. 7E, Albany, New York.

c. The names and identities of the individuals confiscating said papers and documents;

ANSWER

c. Detective John Tanchak is the only individual who plaintiff now knows participated in these confiscations.

d. Whether consent was given for the confiscation of said documents and papers and if so, by whom and to whom.

ANSWER

d. No consent was given.

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

ANSWER

83. Search warrant

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.

ANSWER

84. Albany County defendants including but not limited to Joseph Donnelly obtained with other defendants a search warrant for plaintiff's apartment based on perjury and lacking probable cause. This was done in furtherance of a conspiracy among defendants and others to remove certain political activists from the streets of Albany during a September 22, 1981 demonstration. This process was used as a subterfuge to seize personal and political documents belonging to plaintiff and her associates.



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.

ANSWER 85. The Albany County defendants with other defendants conspired to arrest plaintiff and incarcerate for three (3) days. All this was done without the consent of plaintiff and 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.

ANSWER 86. Plaintiff was first restrained in her apartment and subsequently at Division II and the Albany County Jail.

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

ANSWER 87. September 22, 1981 at about 3:00 a.m. to September 24, 1981 at about 11:00 a.m.

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.

ANSWER 88. See answer to number 87 above. Plaintiff does not now know the names of the individuals who supervised her during her detention.

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.



ANSWER 89. Plaintiff was arrested subsequent to an illegal search and heed without lawful probable cause on violation charges with no bail set.

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.

ANSWER 90. Upon plaintiff's arrest on September 22, 1981, she was handcuffed. While still in her apartment, Plaintiff was then held at Division II for approximately seven (7) hours and at Albany County Jail for forty-eight (48) hours. Most of this time in isolation. No physical force was used. Restraint was by handcuffs and/or barred cells. These acts were all done by various defendants in furtherance of a conspiracy.

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

ANSWER 91. E. J. Josey, 12-E Old Hickory Drive, Albany, New York.

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



a. Type of structure (i.e. corporation, partnership);

ANSWER

a. unincorporated association  
b. Date of organization;

ANSWER

b. July, 1981  
c. Founder;

ANSWER

c. Initial co-chairs were Clara Satterfield and Michael Dollard.

d. Address of coalition;

ANSWER

d. P. O. Box 3002, Pine Hills Station, Albany, New York 12203

e. List names and addresses of officers, directors, shareholders, partners, members, trustees, associates;

ANSWER

e. Present steering committee members are  
Vera Michelson, see answer to Interrogatory #1  
Anita Thayer, 196 Mt. Hope Drive, Albany, New York  
Reverend Robert Dixon, 187 Whitehall Road, Albany, New York  
Barbara Henderer, 325 Hudson Avenue, Albany, New York  
Eileen Kawola, 39 Academy Road, Albany, New York  
E. J. Josey, see answer to Interrogatory #91  
Gary Pavlic, 10 Eberle, Box 261, Latham, New York

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;



ANSWER

- f. Attached hereto is a recently-produced brochure. marked Exhibit "B"
- g. List all the coalitions subsidiaries; affiliates and/or parent organizations.

ANSWER

g. Democratic Socialists of America, YWCA, Gay Community Center, National Lawyers Guild, Albany Branch NAACP, Peace and Justice Commission, Women's International League for Peace and Freedom, Blacks in Government, Central American Solidarity Alliance, Albany Peace and Energy Coalition, African Students Association.

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

- a. Where the demonstration was to take place;

ANSWER

a. The Capitol and Bleecker Stadium, and enroute between the two.

- b. Date and time of demonstration;

ANSWER

b. September 22, 1981 5:00 p.m. Capitol  
7:00 p.m. Bleecker Stadium.

- c. Number of participants expected;

ANSWER

c. Not known  
d. Names and addresses of organizers of said demonstration;

ANSWER

d. Clara Satterfield and Michael Dollard were co-chairs of the Coalition.

Honorable William Booth was the Chairperson of S.A.R.T. All members, associates and affiliates of S.A.R.T. and the Coalition were organizers.

- e. Expected duration of demonstration.

ANSWER

e. Four (4) hours.



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

ANSWER 94. Permission was first requested in a September 10, 1981 letter to Mayor Erastus Corning from Attorney George King. Permission for the demonstration was granted by Mayor Erastus Corning to Michael Dollard, Clara Satterfield and was publicized in the press.

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

a. Dates and times of the meetings;

ANSWER a. September 16, 1981  
September 22, 1981

b. Names of all present at the alleged meetings;

ANSWER b. The September 22, 1981 meeting was attended by Karen Bramer and Michael Kozak from the Coalition and three officers from the Albany City Police Department including a Sgt. McCormick and Sgt. Delisle.

c. Nature of discussions at said meetings;

ANSWER c. At the September 16, 1981 meeting of the Mayor's office all those present reviewed their commitment to non-violence and the demonstration route was discussed. Coalition representatives advised those present of the Coalition's plans including the use of trained marshal's, etc. At the September 22, 1981 meeting the police at the request of the Coalition agreed to provide a police escort for the student "feeder" march from SUNYA, agreed to release spectators from the stadium away from the demonstrators; agreed



that charter busses would park on Manning Boulevard after the rally, and the police provided the Coalition with certain phone numbers for the marshals to use during the demonstration. The Coalition representatives requested that a police liason be designated to talk with the Coalition's chief marshalls during the demonstration.

- d. Annex copies of any agreements, documents or memoranda produced as a result of said meetings.

ANSWER d. There was also telephone and/or personal communication between the Coalition and the Capitol Police. On information and belief a written permit was issued by the Capital police for the use of Capitol Park. Plaintiffs do not have a copy of this permit. There were no other written agreements.

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

- a. Names and identities of participants in strategy;

ANSWER a. All named defendants, Honorable Thomas E. Keegan, and others not now known to plaintiff.

- b. Acts and omissions which constituted alleged strategy.

ANSWER b. The strategy included the arrest of certain political activists, and the spreading of false rumors of violence. The allegations alleged in the complaint are all part of this 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 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.

ANSWER 97. This information will be supplied to the County Defendants as soon as the plaintiffs complete their compilation of this material.

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;

ANSWER a. The advice was on information and belief given by members of the Albany City Police Department whose precise identities are not now known to Plaintiff. These acts were done in furtherance of the conspiracy in which the County defendants participated.

b. Names of individuals and commercial establishments to whom information was conveyed;

ANSWER b. Commercial establishments include but are not limited to: Gibby's Paradise Lounge and Waterworks.

- c. Manner in which information conveyed. If in writing, identify and annex copy.

ANSWER c. Oral



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;
- b. Dates and times of the alleged occurrences;
- c. Places of the alleged occurrences.

ANSWER 99. Michael Dollard, Vera Michelson, Margaret Kirwin, Frank Fitzgerald, Howard Straiker, John Ragusa, John Cutro. Throughout September 1981 especially during the three (3) days preceding September 22, 1981. Also all those attending Coalition meetings which were being surveilled by law enforcement officers. These acts were done by various defendants and others, none of whom are now specifically known to plaintiff.

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

ANSWER 100. The reputation of the Coalition and its members as law abiding, peaceful citizens was damaged by the repeated statements by the defendnats and others that a violent confrontation was planned and by the illegal arrest of four (4) individuals affiliated with the Coalition.

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

ANSWER 101. Plaintiff will best be able to answer this question after certain planned discovery is completed. This answer will be supplied in an amended and supplemental answer to these interrogatories.



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

ANSWER 102. See answer to Interrogatory #5 The Coalition and its members are part of the same group of political activists.

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.

ANSWER 103. See answer to Interrogatory #101

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

ANSWER 104. See answer to Interrogatory #102.

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.

ANSWER 105. See answer to Interrogatory #101.

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

ANSWER 106. The spreading of false rumors of violence and the arrest on criminal charges of four (4) individuals identified with the Coalition interfered with the demonstration, chilled certain interested individuals from participating, and deprived the demonstration of a speaker, Michael R. Young and a leading participant Vera Michelson.

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.

ANSWER 107. See answer to Interrogatory #101.

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.

ANSWER 108. See answer to Interrogatory #106.

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.

ANSWER 109. See answer to Interrogatory #101.

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;

ANSWER a. Subsequent to 3:00 a.m. at the apartment of Vera Michelson, 400 Central Avenue, Apt. 7K, Albany, New York.

b. Identify all documents alleged to have been seized;

ANSWER b. Exhibit B as attached to the complaint specifically Items 1 a), b), c), d), f), g), h), i), l. These included various lists of individuals affiliated with the Coalition.

c. Names and/or identities of all individuals acting on behalf of the defendants;

ANSWER c. John Tanchak and others not now known to plaintiff.

d. Names and addresses of all individuals present other than representatives of defendants;



ANSWER

- d. None now known to plaintiff
- e. What, if any, property has not been returned to plaintiff Coalition.

ANSWER

e. These papers have been returned to Vera Michelson. On information and belief photo copies were retained by various law enforcement officers. These documents were Coalition papers distributed to Vera Michelson so she could carry out her duties for the Coalition.

FURTHERMORE, plaintiffs agree to supplement these answers pursuant to Rule 26(e).

The Answers to the above Interrogatories #1 to 90 are

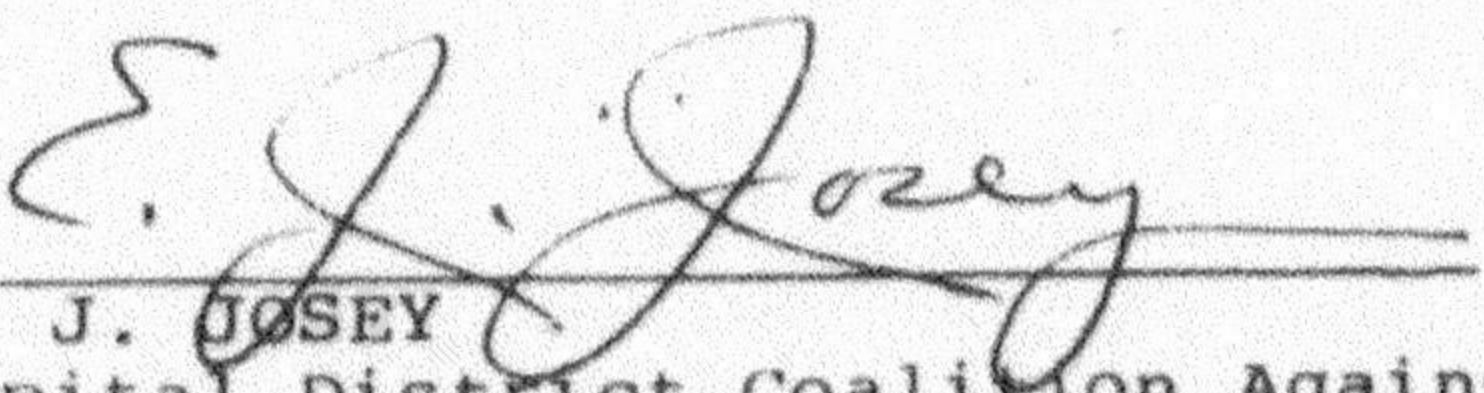
Respectfully Submitted,

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VERA MICHELSON

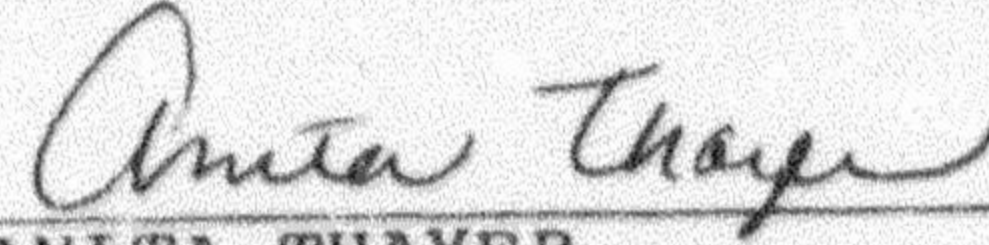
The Answers to the above Interrogatories #91 to 110 are

Respectfully Submitted,

  
E. J. JOSEY  
Capital District Coalition Against  
Apartheid and Racism

The Objections marked above are

Respectfully Submitted,

  
ANITA THAYER  
WALTER & THAYER  
69 Columbia Street  
Albany, New York 12207  
(518) 462-6753



STATE OF NEW YORK )  
 ) SS:  
COUNTY OF ALBANY )

VERA MICHELSON, being duly sworn, deposes and says that deponent is the plaintiff in the within action; that deponent has read the foregoing Answer to Interrogatories and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true.

\_\_\_\_\_  
VERA MICHELSON

SWORN TO BEFORE ME THIS  
\_\_\_\_ DAY OF AUGUST, 1983.

\_\_\_\_\_  
Notary

STATE OF NEW YORK )  
 ) SS:  
COUNTY OF ALBANY )

E. J. JOSEY being duly sworn, deposes and says that deponent is the Chairperson of the association named in the within action; that deponent has read the foregoing Answers to Interrogatories and knows the contents thereof; and that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters deponent believes it to be true.

*E. J. Josey*  
\_\_\_\_\_  
E. J. JOSEY

SWORN TO BEFORE ME THIS  
31 DAY OF AUGUST, 1983.

*Anna Tracy*  
\_\_\_\_\_  
Notary

*Ann Eppie*  
Alb Co 3/31/84



TO: CARTER CONBOY BARDWELL CASE & BLACKMORE  
Attorneys for Albany County Defendants  
74 Chapel Street  
Albany, New York 12207

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Assistant Attorney General  
Attorney for State of New York Defendants  
State Capitol  
Albany, New York 12223

JOHN L. SHEA  
Assistant Corporation Counsel  
Attorney for City of Albany Defendants  
100 State Street  
Albany, New York 12207



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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VERA MICHELSON, et al.

Plaintiffs,

v.

PAUL DALY, AGENT IN CHARGE,  
FEDERAL BUREAU OF INVESTIGATION,  
et al.,

Defendants.

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REQUEST FOR PRODUCTION  
OF DOCUMENTS TO VERA  
MICHELSON

Civil No. 82-CV-1413

(Hon. Roger J. Miner)

U.S. DISTRICT COURT  
N. D. OF N. Y.  
FILED

APR 18 1984

TO: ANITA THAYER, ESQUIRE  
Walter & Thayer  
69 Columbia Street  
Albany, New York 12207

AT \_\_\_ O'CLOCK \_\_\_ M.  
J. R. SCULLY, Clerk  
ALBANY

VERA MICHELSON  
c/o Anita Thayer, Esquire  
Walter & Thayer  
69 Columbia Street  
Albany, New York 12207

COPY

MADAMS:

YOU ARE HEREBY REQUESTED pursuant to Rule 34 of the Federal Rules of Civil Procedure, to produce for inspection and copying on or before May 15, 1984, the following documents:

1. Any recorded statement, written or otherwise, including any notes, of VERA MICHELSON, regarding the subject matter of this action.
2. All documents or other materials upon which plaintiff, VERA MICHELSON, intends to rely at the trial of this action.