

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

VERA MICHELSON, et al.
Plaintiffs,

v.

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

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

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

INTERROGATORIES TO
PLAINTIFF VERA MICHELSON

Civil No. 82-CV-1413

(Hon. Roger J. Miner)

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

APR 18 1984

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

COPY

MADAMS:

Pursuant to Rule 33, Federal Rules of Civil Procedure, the following Interrogatories are served upon you to be answered by plaintiff VERA MICHELSON under oath by May 15, 1984.

1. List all actions allegedly taken by PAUL DALY, which plaintiff will seek to prove at the trial, if any, of this matter.
2. As to each such action listed above, state the name of the witness who will testify to such alleged action.
3. As to each such action listed above state what proof, if any, in addition to the testimony of a witness, the plaintiff will seek to introduce to prove said action.

4. List all actions allegedly taken by JAMES J. ROSE, which plaintiff will seek to prove at the trial, if any, of this matter.

5. As to each such action listed above, state the name of the witness who will testify to such alleged action.

6. As to each such action listed above state what proof, if any, in addition to the testimony of a witness, the plaintiff will seek to introduce to prove said action.

7. List all witnesses who will testify in the plaintiff's case.

8. As to each witness who will testify in the plaintiff's case, set forth the criminal records of such persons, including all arrests and/or convictions.

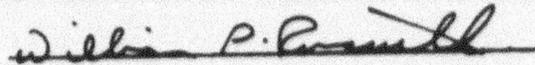
9. As to the plaintiff, VERA MICHELSON, and witnesses who will testify in plaintiff's case, set forth a summary of their expected testimony.

Dated: April 18, 1984

Respectfully submitted,

FREDERICK J. SCULLIN, JR.
UNITED STATES ATTORNEY
Northern District of New York
U.S. Post Office & Courthouse
445 Broadway, Room 409
Albany, New York 12207

BY:



WILLIAM P. FANCIULLO
ASSISTANT U.S. ATTORNEY

*When was I charged?
99.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

-against-

82-CV-1413

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

Defendants.

AARON ESTIS,

Plaintiff,

ALBANY CITY
DEFENDANTS'
INTERROGATORIES
TO THE PLAINTIFF
MICHELSON

[Hon. R.J.M.]

-against-

82-CV-1412

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

Defendants.

The defendants, City of Albany, Thomas Burke, John Reid,
William Murray and John Tanchak (hereinafter referred to as
the City defendants), by their attorney, Vincent J. McArdle, Jr.,
Corporation Counsel for the City of Albany, New York, hereby
demand pursuant to FRCP Rule 33, that the plaintiff, Vera
Michelson, answer the following interrogatories, in writing,
within thirty (30) days of the receipt thereof:

1. Present residence address of the plaintiff.
2. Present occupation of the plaintiff together with the
name and address of her employer, and if different, the same
information relative to September of 1981.
3. Whether the plaintiff was ever a member of the Capital
District Coalition Against Apartheid and Racism, and if so,
the time during which said plaintiff

dates.

4. Whether the plaintiff was an officer or held a like position with the Capital District Coalition Against Apartheid and Racism, and if so, the name of said office or position held together with the relevant dates.

5. Set forth the source of plaintiff's information and the grounds for plaintiff's belief, that her apartment, had been under surveillance prior to September 21, 1981, further setting forth the alleged reason for such surveillance and the specific defendants involved in same.

6. Set forth the name(s) of the source(s) of the plaintiff's information and the ground for plaintiff's belief that the alleged informant is a fabrication and does not exist.

7. Set forth separately with respect to the defendants, Reid, Murray and Tanchak, each and every act of said defendants relative to the preparation of the search warrant application in question.

8. Set forth the source of the plaintiff's information and the grounds for the plaintiff's belief that the warrant application was perjurious, further setting forth each and every statement within same that the plaintiff will allege was perjurious.

9. Set forth the basis for the plaintiff's allegation that there was not probable cause for the warrant application, which allowed the search of apartment 7K, 400 Central Avenue, Albany, New York.

10. Set forth the complete list of all property within the apartment that the plaintiff will allege was damaged or

destroyed, further setting forth the name of the defendant responsible in each such case.

11. Set forth separately with respect to each of the individual City defendants, each and every act performed with reference to the conspiracy alleged in paragraph "50" of the complaint, further setting forth the date, time and place where each such act was allegedly performed.

12. Set forth how and in what manner the plaintiff will allege that the acts of the City defendants, allegedly deprived her of her rights under the following amendments to the United States Constitution:

- a. Fourth Amendment;
- b. Fourteenth Amendment;
- c. Fifth Amendment.

13. Set forth separately with respect to each of the City defendants, how their respective acts and/or omissions, allegedly deprived the plaintiff of the following rights:

- a. Right to privacy;
- b. Right to freedom of association;
- c. Rights guaranteed under the First Amendment;
- d. Right to be free from unreasonable searches and seizures;

further setting forth separately with respect to each such defendant each such act and/or omission which will be alleged to have been performed as to each of the above mentioned deprivations.

14. Set forth the exact date, time, place and persons responsible for the alleged gun powder test given to this plaintiff.

15. Set forth the exact dates, times, places and persons responsible for the alleged interrogation of this plaintiff, relative to her political activities and plans for a demonstration, as set forth in paragraph "62" of the complaint.

16. Set forth the source of the plaintiff's information and the grounds for the plaintiff's belief, relative to the allegations contained in paragraph "64" of the complaint, further setting forth the specific defendants involved in that discussion.

17. Set forth the exact basis for the dismissal of the charges on December 8, 1981, as related to the plaintiff and/or her attorney.

18. Set forth separately with respect to each City defendant, each and every act of said persons, that the plaintiff will allege constituted the conspiracy set forth in paragraph "71" of the complaint.

19. Set forth how and in what manner the plaintiff will allege that she was deprived of the following rights under the United States Constitution:

- a. Rights under the Sixth Amendment;
- b. Rights under the Eighth Amendment;
- c. Rights under the First Amendment;
- d. Rights under the Fourteenth Amendment.

as set forth in paragraph "71" of the complaint, further specifying, separately relative to the City defendants, the

acts allegedly applicable to said defendants relative to same.

20. Set forth how and in what manner the plaintiff will seek to show that the defendant, City of Albany, was responsible for the acts of the Hon. Thomas W. Keegan, further setting forth the relationship between the City and Judge Keegan upon which the plaintiff will allege responsibility by the City.

21. Set forth each and every act of the defendant, Burke, that the plaintiff will allege was illegal and related to an alleged conspiracy as set forth in paragraph "73" of the complaint.

22. Set forth each and every act of the defendant, Reid, that the plaintiff will allege was illegal and related to an alleged conspiracy as set forth in paragraph "73" of the complaint.

23. Set forth each and every act of the defendant, Murray, that the plaintiff will allege was illegal and related to an alleged conspiracy as set forth in paragraph "73" of the complaint.

24. Set forth any and all proof that the plaintiff will present, that is relevant to the issue of an alleged policy of the City of Albany, as set forth in paragraph "73" of the complaint.

25. Set forth each and every act of the defendant, City of Albany, that will be alleged shows a sharing of policy with the defendant, County of Albany, as set forth in paragraph "75" of the complaint.

26. Set forth the constitutional rights of the plaintiff that were allegedly violated by this policy, as set forth in paragraph "77" of the complaint.

27. Set forth each and every act and/or omission of the defendant, City of Albany, that the plaintiff will allege constitutes gross negligence.

28. Set forth each and every act and/or omission of the defendant, Burke, that the plaintiff will allege constitutes gross negligence.

29. Set forth how and in what manner, the supervision provided by the defendants, City of Albany and Thomas Burke, was inadequate.

30. Set forth separately with respect to each of the City defendants, what will be said to constitute malice towards the plaintiff.

31. Set forth separately with respect to each of the City defendants, the acts and/or omissions that constitute the elements of the alleged malicious prosecution of the plaintiff.

32. Set forth separately with respect to each of the City defendants, the acts and/or omissions that constitute the elements of the alleged cause of action for abuse of process.

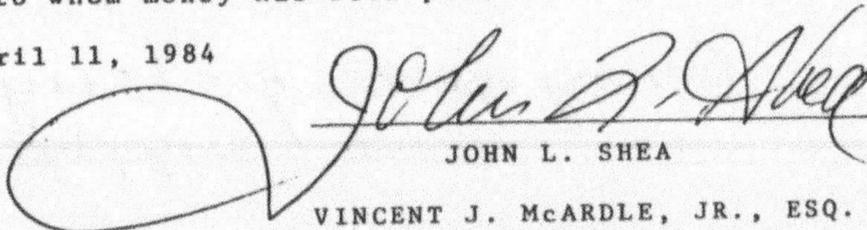
33. Set forth separately with respect to each of the City defendants, the acts and/or omissions that constitute the elements of the false arrest of the plaintiff.

34. Set forth the exact dates, times and places where the plaintiff will allege she was falsely imprisoned.

35. Each and every item of special damage that the plaintiff will allege resulted from this incident, setting

forth complete details of such expenditures and/or losses,
including to whom money has been paid.

DATED: April 11, 1984



JOHN L. SHEA

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

TO: WALTER & THAYER
Attorneys for plaintiffs
Michelson and Coalition
69 Columbia Street
Albany, New York 12207

OLIVER & OLIVER
Attorneys for plaintiff, Estis
31 Barclay Street
Albany, New York 12209

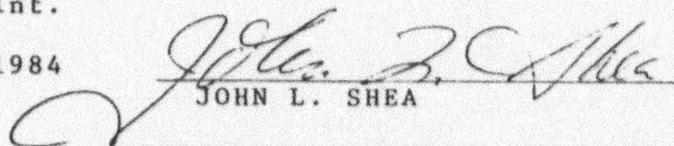
CARTER, CONBOY, BARDWELL, CASE & BLACKMORE
Attorneys for defendant Albany County
74 Chapel Street
Albany, New York 12207

U.S. ATTORNEY'S OFFICE
Attorney for defendants, Daly and Rose
U.S. Post Office and Courthouse
Broadway
Albany, New York 12201

Please review

1. A copy of the Coalition's charter, by-laws and/or platform, as originally drafted, during the organizational stages of said Coalition.
2. A copy of the document originally prepared in the organizational stages of the Coalition, which sets forth the purposes of said Coalition.
3. Copies of the minutes of all meetings of said Coalition from the initial organizational meeting which allegedly occurred on or about July of 1981, up until the present day that the demand is responded to by the plaintiff, Coalition.
4. Copies of all documents filed with the office of the Secretary of State of the State of New York, from the time of the organization of said Coalition to date.
5. Copies of documents that memorialize the election and/or appointment of persons to official positions with the Coalition, from the date of first organization to the date that this demand is complied with.
6. Copies of any amendments to the charter, by-laws, platform and/or purposes of the Coalition, to date.
7. Copies of receipts or other documents which would reflect items of special damages allegedly incurred by the plaintiff, Coalition, as a result of the acts set forth in its complaint and amended complaint.

DATED: April 11, 1984


JOHN L. SHEA

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

(PRINT NAME BELOW SIGNATURE)

based on my personal knowledge and on information provided to me by other Special Agents of the FBI, based on their investigation of the activities of the CWP.

1. Information concerning the planned violent activities of the CWP in conjunction with the visit of the Springboks Rugby Team to Albany, New York in September 1981, was provided to local law enforcement authorities by the FBI. It was only provided to them in their capacity as law enforcement officers, and prosecutors and was only for their official use.

2. The FBI has not disclosed the identity of the confidential source to any local law enforcement authorities, although information which tends to identify the source and may in fact identify the source was disclosed to local law enforcement authorities in their official capacities.

3. Information from the confidential source was disclosed to local law enforcement personnel only with express and implied promises of confidentiality for the confidential source, including information which would tend to identify the confidential source.

4. Any knowledge, belief, or speculation on the part of any present or former law enforcement officer including those occupying prosecutorial positions, would be based on information given to that individual in his or her official capacity by the FBI, and only pursuant to express and/or implied promises of

confidentiality for the identity of the source and all information tending to identify the source.

5. It is the position of the FBI that information concerning the identity of the informant or tending to disclose the identity of the informant is subject to an informant privilege and I have been advised by Assistant United States Attorney Fanciullo that it is his intention to assert this privilege at the appropriate time. It is my belief that disclosure of the informant's identity or any information tending to identify the confidential source should be prohibited for the following reasons:

a. Any premature disclosure would render moot any attempt by the Government to preserve the claim of privilege.

b. Disclosure of the identity of the confidential source would put the confidential source in immediate grave personal physical danger. This is based on information provided to me by Special Agents of the FBI who have advised me that members of the CWP have a history of engaging in violent activities in the past and upon expressions of concern to me by the confidential source for the source's own safety should his/her identity become known, based on the confidential source's knowledge of the activities of the CWP.

c. Disclosure of the identity of the confidential source or information tending to disclose such identity would impede the Government from obtaining sources in the future. Informants are essential to law enforcement.

d. Disclosure of such information could lead to disclosure of investigative techniques, at the very least, concerning Government dealings with informants.

e. Disclosure of such information would impede ongoing investigations in that current informants would reconsider their roles, no longer able to rely on promises of anonymity.

James J. Rose
JAMES ROSE
Special Agent, FBI

Sworn to before me this

1st day of May, 1984.

Anne Marie Krajewski
Notary Public

ANNE MARIE KRAJEWSKI
Notary Public, State of New York
Qualified in Albany County
Commission Expires March 30, 1986
#4676452

Pless review

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

-against-

82-CV-1413

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

Defendants.

AARON ESTIS,

Plaintiff,

-against-

82-CV-1412

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

Defendants.

ALBANY CITY
DEFENDANTS'
DEMAND FOR
INTERROGATORIES
TO PLAINTIFF
COALITION

The defendants, City of Albany, Thomas Burke, John Reid,
William Murray and John Tanchak (hereinafter referred to as
City defendants), by their attorney, Vincent J. McArdle, Jr., Esq.
Corporation Counsel for the City of Albany, New York pursuant
to FRCP Rule 33, demands that the plaintiff, Capital District
Coalition Against Apartheid and Racism, by its Chairman,
Michael Dollard, set forth answers to the following interrogator-
ies, in writing, within thirty (30) days of the receipt of
this document:

1. Set forth the legal status of said plaintiff (i.e.
corporation, unincorporated association, etc.), together with
the date that such plaintiff was originally organized.

2. Set forth the name and address of each and every person involved in the initial organization of the plaintiff, Coalition.

3. Set forth whether the plaintiff, Coalition, has persons in positions of authority, be they officers or otherwise, and if so, set forth the name and address of the persons occupying these positions at the following dates:

- a. The date of original organization;
- b. On or about September 22, 1981;
- c. On or about December 15, 1982;
- d. On or about the date that these

interrogatories are responded to.

4. The name, address and official title, if any, of the person answering these interrogatories on behalf of the plaintiff, Coalition.

5. Whether there existed at the time of the organization of the plaintiff, Coalition, or at any time prior to September 22, 1981, a set of by-laws or a written platform regarding the purpose of said organization.

6. As of September 22, 1981, a list of the organizations allegedly affiliated with the plaintiff Coalition, including a local address for each such organization.

7. With respect to the alleged cooperation of Coalition leaders, as set forth in paragraph "99" of the complaint, set forth the name and address of each and every Coalition leader who allegedly met with the defendant, City of Albany, Thomas Burke, John Reid, William Murray and/or John Tanchak, prior to the September 22, 1981 demonstration, further setting forth the

date and place of each such meeting.

8. With respect to the demonstration of September 22, 1981, set forth the following:

a. The place where the demonstration was to be held;

b. The number of persons expected to participate in same.

9. Set forth what was the basis of the alleged, unprecedented political clout of the Coalition, as set forth in paragraph "101" of the complaint.

10. Set forth in detail, the alleged strategy of the City defendants, relative to the demonstration, further setting forth, separately, the contributions to such a strategy by each of the City defendants.

11. With respect to the allegations made in paragraph "102" of the complaint, set forth the following:

a. All information distributed by the City defendants;

b. The specific City defendant responsible for such distribution;

c. Any and all information that was allegedly distributed, that it will be alleged was fabricated;

d. Any and all information that will be alleged was distributed and was untrue;

e. The name and address of each and every public official who received any of the above;

f. The name and address of each and every newspaper and/or newspaper reporter who received any of the above information;

g. The name and address of each and every member of the Coalition who was the recipient of any of the above information, and the person responsible for giving such information to the Coalition.

12. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Burke, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

13. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Reid, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

14. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Murray, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

15. With respect to the allegations contained in paragraph "105" of the complaint, set forth the following:

a. The City defendants who allegedly so advised local commercial establishments;

b. The local commercial establishments that were allegedly so advised, setting forth the name and address of the person who was the recipient of such advice; and

c. The date and time that such advice was given to each such commercial establishment.

16. Whether the plaintiff will allege that any of the City defendants provided information to the New York State Superintendent of Police or to the Governor of the State of New York, and if so, the defendant providing same and the contents of any information so provided.

17. With respect to the alleged harrassment of the Coalition and its members, set forth the following:

a. Name and address of Coalition member who was harrassed;

b. Name of the defendant responsible for the harrassment;

c. The facts that will be alleged to constitute harrassment; and

d. The date, time and place where the harrassment allegedly took place.

18. With respect to the alleged surveillance that the Coalition and its members were subjected to, set forth the following:

a. The name and address of all Coalition members allegedly subjected to surveillance;

b. The names of all City defendants allegedly involved in the surveillance; and

c. With respect to such surveillance, the date and time it occurred and the place where it occurred.

19. As a result of the alleged acts of the City defendants, set forth how the members of the plaintiff, Coalition, were deprived of the following:

a. Equal protection of the law;

b. Equal privileges and immunities under the law;

c. Right to freedom of speech;

d. Right to freedom of association;

e. Rights under the First Amendment of the United States Constitution; and

f. Rights under the Fourteenth Amendment of the United States Constitution.

20. Set forth how and in what manner any of the City defendants allegedly intimidated members of the plaintiff, Coalition.

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:

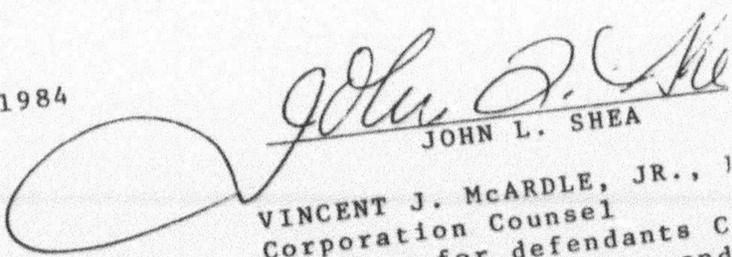
- a. Seized Coalition property, which included lists of names and telephone numbers;
- b. Made copies of such documents;
- c. Retained copies of such documents.

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 defendants 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

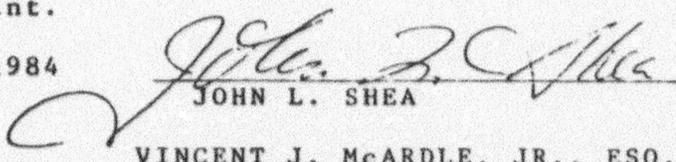

JOHN L. SHEA
VINCENT J. McARDLE, JR.,
Corporation Counsel
Attorney for defendants C
Burke, Reid, Murray and
City Hall
Albany, New York 12207

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

Document
Demanda
From City

1. A copy of the Coalition's charter, by-laws and/or platform, as originally drafted, during the organizational stages of said Coalition.
2. A copy of the document originally prepared in the organizational stages of the Coalition, which sets forth the purposes of said Coalition.
3. Copies of the minutes of all meetings of said Coalition from the initial organizational meeting which allegedly occurred on or about July of 1981, up until the present day that the demand is responded to by the plaintiff, Coalition.
4. Copies of all documents filed with the office of the Secretary of State of the State of New York, from the time of the organization of said Coalition to date.
5. Copies of documents that memorialize the election and/or appointment of persons to official positions with the Coalition, from the date of first organization to the date that this demand is complied with.
6. Copies of any amendments to the charter, by-laws, platform and/or purposes of the Coalition, to date.
7. Copies of receipts or other documents which would reflect items of special damages allegedly incurred by the plaintiff, Coalition, as a result of the acts set forth in its complaint and amended complaint.

DATED: April 11, 1984


JOHN L. SHEA

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

(PRINT NAME BELOW SIGNATURE)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

-against-

82-CV-1413

PAUL DALY, AGENT IN CHARGE, FEDERAL
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Defendants.

AARON ESTIS,

Plaintiff,

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ALBANY CITY
DEFENDANTS'
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INTERROGATORIES
TO PLAINTIFF
COALITION

The defendants, City of Albany, Thomas Burke, John Reid, William Murray and John Tanchak (hereinafter referred to as City defendants), by their attorney, Vincent J. McArdle, Jr., Esq. Corporation Counsel for the City of Albany, New York pursuant to FRCP Rule 33, demands that the plaintiff, Capital District Coalition Against Apartheid and Racism, by its Chairman, Michael Dollard, set forth answers to the following interrogatories, in writing, within thirty (30) days of the receipt of this document:

1. Set forth the legal status of said plaintiff (i.e. corporation, unincorporated association, etc.), together with the date that such plaintiff was originally organized.

2. Set forth the name and address of each and every person involved in the initial organization of the plaintiff, Coalition.

3. Set forth whether the plaintiff, Coalition, has persons in positions of authority, be they officers or otherwise, and if so, set forth the name and address of the persons occupying these positions at the following dates:

- a. The date of original organization;
- b. On or about September 22, 1981;
- c. On or about December 15, 1982;
- d. On or about the date that these

interrogatories are responded to.

4. The name, address and official title, if any, of the person answering these interrogatories on behalf of the plaintiff, Coalition.

5. Whether there existed at the time of the organization of the plaintiff, Coalition, or at any time prior to September 22, 1981, a set of by-laws or a written platform regarding the purpose of said organization.

6. As of September 22, 1981, a list of the organizations allegedly affiliated with the plaintiff Coalition, including a local address for each such organization.

7. With respect to the alleged cooperation of Coalition leaders, as set forth in paragraph "99" of the complaint, set forth the name and address of each and every Coalition leader who allegedly met with the defendant, City of Albany, Thomas Burke, John Reid, William Murray and/or John Tanchak, prior to the September 22, 1981 demonstration, further setting forth the

date and place of each such meeting.

8. With respect to the demonstration of September 22, 1981, set forth the following:

a. The place where the demonstration was to be held;

b. The number of persons expected to participate in same.

9. Set forth what was the basis of the alleged, unprecedented political clout of the Coalition, as set forth in paragraph "101" of the complaint.

10. Set forth in detail, the alleged strategy of the City defendants, relative to the demonstration, further setting forth, separately, the contributions to such a strategy by each of the City defendants.

11. With respect to the allegations made in paragraph "102" of the complaint, set forth the following:

a. All information distributed by the City defendants;

b. The specific City defendant responsible for such distribution;

c. Any and all information that was allegedly distributed, that it will be alleged was fabricated;

d. Any and all information that will be alleged was distributed and was untrue;

e. The name and address of each and every public official who received any of the above;

f. The name and address of each and every newspaper and/or newspaper reporter who received any of the above information;

g. The name and address of each and every member of the Coalition who was the recipient of any of the above information, and the person responsible for giving such information to the Coalition.

12. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Burke, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

13. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Reid, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

14. The source of plaintiff's information and the grounds for plaintiff's belief, that the defendant Murray, disseminated information concerning a confrontation between the Communist Worker Party and the Connecticut Klu Klux Klan, further setting forth the date and time that such information was allegedly given out.

15. With respect to the allegations contained in paragraph "105" of the complaint, set forth the following:

a. The City defendants who allegedly so advised local commercial establishments;

b. The local commercial establishments that were allegedly so advised, setting forth the name and address of the person who was the recipient of such advice; and

c. The date and time that such advice was given to each such commercial establishment.

16. Whether the plaintiff will allege that any of the City defendants provided information to the New York State Superintendent of Police or to the Governor of the State of New York, and if so, the defendant providing same and the contents of any information so provided.

17. With respect to the alleged harrassment of the Coalition and its members, set forth the following:

a. Name and address of Coalition member who was harrassed;

b. Name of the defendant responsible for the harrassment;

c. The facts that will be alleged to constitute harrassment; and

d. The date, time and place where the harrassment allegedly took place.

18. With respect to the alleged surveillance that the Coalition and its members were subjected to, set forth the following:

a. The name and address of all Coalition members allegedly subjected to surveillance;

b. The names of all City defendants allegedly involved in the surveillance; and

c. With respect to such surveillance, the date and time it occurred and the place where it occurred.

19. As a result of the alleged acts of the City defendants, set forth how the members of the plaintiff, Coalition, were deprived of the following:

a. Equal protection of the law;

b. Equal privileges and immunities under the law;

c. Right to freedom of speech;

d. Right to freedom of association;

e. Rights under the First Amendment of the United States Constitution; and

f. Rights under the Fourteenth Amendment of the United States Constitution.

20. Set forth how and in what manner any of the City defendants allegedly intimidated members of the plaintiff, Coalition.