

ANSWER TO INTERROGATORY #24: I was suspicious of some sort of surveillance for a long time, although my suspicions were not confirmed until the summer of 1976. At the first major demonstration at the Honeywell facilities in Wellesley, MA (a mock funeral, as I recall), several men -- Honeywell employees, presumably -- approached me and addressed me by name, indicating their familiarity with my face and history with Honeywell. I had never seen any of them before. Primary spokesperson was Kurt Van Vlandren -- who, by virtue of his PR-type sales position with Honeywell, became a contact person between our group and Honeywell. This was in 1972.

This type of thing happened frequently while leafletting various plants -- in particular, the Waltham computer headquarters of Honeywell. Many employees would greet me by name as they took a leaflet. It was evident that certain "ringleaders" had been singled out and identified.

By late summer 1972, we began to notice a photographer following us from plant to plant -- in particular, I remember his presence at the facility on Soldiers Field Road in Brighton, MA, and at the Waltham plant. By the October 25, 1972 demonstration, we had been photographed at nearly every site.

On that day, there were photographers and videotapers on the roof and behind the bushes of the Waltham facility.

An FBI agent (name unknown) telephoned the mother of two members of the Weston Street household -- Keith and Greg Filion. Both had been very active in our direct action group. Dorothy (Mrs. Arnold) Filion was warned that her sons would be in considerable trouble if they did not watch their anti-war activities. This was in the spring of 1973.

(Mrs. Filion currently lives at 58 Sea Street, Dennisport, MA).

Two FBI agents (names unknown) visited the Weston Street house itself shortly after we moved there in October, 1973

-- possibly that winter. Greg Filion met them at the door, brought them into the living room, but then refused to answer any questions and asked them to leave. Greg's mother, Mrs. Arnold Filion, was there also. Around the same time, we noticed a car parked across the street from our house. It stayed there (occupied by a male) for several days, then disappeared.

Kay Halvorson of the Minneapolis CALC office told me of people tracking her movements -- and of her surprise when she received her FBI file at how thoroughly they dogged her. This was around 1973. It was she who brought the COINTELPRO memo from the Church Committee to my attention shortly after Marv Davidov discovered it in the summer of 1976. (Kay is now employed at Working Opportunities for Women, 2344 Nicollet Avenue South, Suite 240, Minneapolis). This was the first time I had proof that there actually had been surveillance by the defendants of those opposed to the Honeywell Corporation's production of weapons.

INTERROGATORY NO. 25: State the substance of the information which you assert made you aware of the alleged activities of defendants as indicated in your response to Interrogatory No. 24, and:

- a. Identify any individual or other source of any such information;
- b. Identify any document which refers or relates to, or bears upon, your response to Interrogatories 24 and 25a.

ANSWER TO INTERROGATORY #25: The Church Committee Report (Senate Intelligence Committee Memo, April 14, 1976) is attached to our complaint as exhibit C. It states that the