

- (d) Describe in detail the "variety of methods" used to obtain information concerning the activities of the Honeywell Project, and identify all communications and documents which refer to these methods and describe the results of use of these methods.
- (e) State what were the "then existing FBI Headquarters and Department of Justice instructions in this investigation," and identify all documents which constitute or contain these instructions and all communications which indicate whether the FBI was in compliance with these instructions in the investigation of any plaintiff or organization.
- (f) Identify the communication dated November 16, 1976 which advised that there appeared to be no violation of the federal securities laws involved in informing corporate officers of possible disruptions of a stockholders' meeting or in their receiving such information and describe in detail the basis for such assertion.

ANSWER TO INTERROGATORY NO. 38:

(a) The statutes speak for themselves. The facts, as contained in the files pertaining to Honeywell Project, indicate that it had the avowed objective of causing Honeywell, Inc., to stop production of anti-personnel fragmentation bombs and other materials used by the U.S. Government in connection with its military efforts in Vietnam. Honeywell Project was investigated to determine whether it was attempting, or would attempt, to achieve its purpose through illegal means.

(b) The FBI provided to the White House on a regular basis, summaries of anticipated demonstrations, intelligence and counterintelligence matters, criminal matters, and the like. The documents supporting the assertion in the

letter have not been located.

(c) The facts available to the FBI regarding the activities of Honeywell Project are contained in the files previously provided to plaintiffs, except for those documents to which production has been objected. The files indicate that from time to time Honeywell Project participated in the planning and execution of demonstrations. The FBI had reason to believe that a disturbance would occur in connection with the stockholders' meeting on April 28, 1970, and a disturbance did, in fact, occur.

(d) The "variety of methods" refers to that portion of the letter of October 6, 1976, which states,

Information concerning the activities of the Honeywell Project was obtained through liaison with officials of the Honeywell Corporation, who were in contact with leaders of the organization, from public press articles, and from FBI informants who were reporting on the activities of various anti-war organizations...

Except for that information which would tend to identify a confidential informant, the information responsive to this interrogatory is contained in the documents previously furnished to plaintiff.

(e) The instructions regarding domestic security investigations during the period 1969 to 1972 were set out in Section 87 of the Manual of Instructions. A copy of that Section, with relevant changes, is being provided to plaintiffs. (See Exhibit C)

(f) Memorandum from Edward H. Levi, Attorney General, to Clarence M. Kelley, Director of the Federal Bureau of Investigation, pertaining to "Correspondence concerning Honeywell Project." A copy of this memorandum has previously been provided to plaintiffs.