

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS

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4 UNITED STATES OF AMERICA, :
Plaintiff :
5 VS. : CRIMINAL DOCKET
6 : NO. 86-323-K
7 ROY FRANKHAUSER, :
Defendant :
8 -----

9 CRIMINAL JURY TRIAL
10 FOURTH DAY

11 BEFORE THE HONORABLE ROBERT E. KEETON
12 United States District Judge

13 Courtroom 14
14 U.S.P.O. & Courthouse
15 Boston, Massachusetts
16 Tuesday, November 3, 1967

17 A P P E A R A N C E S

18 FOR THE PLAINTIFF

19 John J.E. Markham II, A.U.S.A.
20 Mark Rasch, D.O.J. Attorney

21 FOR THE DEFENDANT

22 Owen Walker, Federal Defender
23
24
25

1 PROCEEDINGS

2 THE COURT: Are we ready for the jury?

3 MR. MARKHAM: There is one very minor matter. I
4 believe your Honor has it within your power to very easily right
5 an injustice. The Marshals will not keep the Men's Room door on
6 this floor unlocked unless you direct it. They say if you
7 direct that it remains unlocked, they will have it unlocked.
8 But otherwise, we have to come to them for the key. They are
9 not always there --

10 THE COURT: Well, what is the reason? I want to find
11 out why. I don't want to be ruling on something without knowing
12 the reason for the decision.

13 I will take it up with the Marshal's Office and find
14 out what their reasons are. If there are good reasons, then I
15 may not override them. If there aren't, then I'll have it done.

16 All right. Are we ready for the jury?

17 MR. WALKER: Well, don't you want to rise the
18 question --

19 (Counsel conferring)

20 MR. MARKHAM: We're ready, your Honor --

21 MR. WALKER: One other -- no, I can wait, your Honor.

22 THE COURT: All right. The jury may be brought in.

23 (The jury entered the courtroom at 9:35 a.m.)

24 MR. MARKHAM: May I get the witness, your Honor?

25 THE COURT: Good morning, members of the jury.

1 You may. The witness may be called back to the stand.

2 Thank you for being prompt.

3 MR. MARKHAM: May the witness take the witness stand
4 again, your Honor?

5 THE COURT: Yes. Charles Tate, resumed.

6 CONTINUED DIRECT EXAMINATION

7 BY MR. MARKHAM:

8 Q. Good morning, Mr. Tate.

9 A. Good morning.

10 Q. Do you understand, sir, that you're still under oath?

11 A. Yes, I do.

12 Q. Now, yesterday you indicated that you had observed the
13 fundraising activities in the national headquarters as they
14 existed before the 1984 campaign, correct?

15 A. That's correct.

16 Q. And did you observe what entities money was being raised
17 for?

18 A. Well, for a variety of different entities. They would
19 include Campaigner Publications, Executive Intelligence Review,
20 the National Democratic Policy Committee, Fusion Energy
21 Foundation, the Schiller foundation or its -- I forget its
22 precise name. Those would be some of the entities for which
23 money would be raised in the period before 19- -- in the 1983
24 period.

25 Q. All right. Let's take these one at a time.

1 Tell the jury briefly what Fusion was -- is or was.

2 A. Well, the Fusion Energy Foundation is purportedly assigned
3 to the organization devoted to political organizing on behalf of
4 fusion power, nuclear energy, advanced technologies and the
5 like. It serves as kind of the scientific front group, if you
6 will, for the LaRouche organization. It would be used, for
7 example, to facilitate contacts with scientists and other such
8 persons.

9 Q. What is Executive Intelligence Review?

10 A. Executive Intelligence Review is a weekly publication put
11 out by the LaRouche organization in which they publish articles
12 with their analysis of the way the world works and things of
13 this nature, economic analysis, descriptions of the various
14 conspiracies that they see unfolding about them and against them
15 and so forth.

16 Q. All right. You mentioned NDPC.

17 A. Yes.

18 Q. What is that?

19 A. That's the National Democratic Policy Committee. This is the
20 political action group with which the LaRouche organization
21 seeks to intervene into Democratic party affairs, thus the
22 intentional similarity between the name of the group and the
23 Democratic party.

24 Q. Do you know whether there is any affiliation between the
25 national Democratic party and the NDPC?

1 A. Absolutely no affiliation between the two whatsoever.

2 Q. Lastly, I think -- well, there are two more. Schiller, what
3 is Schiller?

4 A. Well, the Schiller foundation or institute or whatever --
5 I'm not really certain of its present name, and I'm not certain
6 if it had precisely that name at the time -- is what might be
7 described as a cultural group which, unfortunately and really
8 inexplicably, seized upon the name of Frederick Schiller, a very
9 marvelous and wonderful human being and poet, as a sort of focus
10 for the organization's cultural activities, which had about as
11 little to do with Frederick Schiller as could be imagined; but,
12 nonetheless, that's what it is. They gave concerts and lectures
13 and things of that sort under the rubric of this organization,
14 the Schiller Institute or whatever.

15 Q. The last group for which you indicated the money was raised
16 before 1984 was Campaigner. What's Campaigner's full name, do
17 you know?

18 A. Campaigner Publications is, I believe, the full name of the
19 business entity.

20 Q. And what was its function?

21 A. It was the publisher and distributor for a variety of the
22 LaRouche organization affiliated publications, including New
23 Solidarity, which is a biweekly newspaper, and a number of other
24 such publications.

25 Q. Now, did you ever have any discussions with anybody during

1 the pre-1984 period in which it was discussed which of these
2 entities money would be raised for on a particular day?

3 A. Well, seldom, if ever, was there such a specific focus in
4 the pre-1984 period on the entity for which money was to be
5 raised. That was much more rigorously defined after 1984.

6 Q. All right. Starting in 1984 with the campaign, did you
7 observe the fundraisers raising money for entities other than
8 these five?

9 A. Yes.

10 Q. Which entities were added?

11 A. The principal entity added was The LaRouche Campaign. And
12 although I don't know that it's quite accurate to describe them
13 as other entities, there were two other motivating features of
14 fundraising aside from the political campaign, The LaRouche
15 Campaign. Those were described on one hand as infrastructure,
16 meaning effectively the day-to-day payment of the organization's
17 bills and so forth, and also expansion for the move that the
18 organization was then undertaking down to Leesburg, Virginia.
19 So there were the sort of three general areas of fundraising.

20 Q. All right. Now, can you compare the amount of fundraising
21 that went on based on your observations before the campaign and
22 then during the campaign?

23 A. Well, the level of fundraising during the campaign was much,
24 much greater, both in duration, intensity and finally in the
25 number of persons devoted of the organization's troops to

1 fundraising.

2 Q. Now, during what part of the 1984 campaign were you in the
3 national headquarters on a daily basis?

4 A. I was in the national headquarters almost all the time
5 except when I was doing security shifts in Leesburg, Virginia
6 from January 1984 until August 17, 1984.

7 Q. Well, for example, how many days during 1984, approximately,
8 were you in the national headquarters observing the fundraising
9 activity?

10 A. Any day that I was in the national headquarters I would be
11 observing fundraising activity. I guess it would have to be
12 something like 175 to 200 days.

13 Q. Was it always the same?

14 A. Yes.

15 Q. Describe for the jury what you would observe about
16 fundraising on the days that you were in the national
17 headquarters during the campaign.

18 A. Okay. The fundraisers -- basically everyone in the national
19 office would be -- would have a meeting starting at 9 a.m., in
20 the morning. There would be a roll call. Each person's name
21 was read off. In fact, if they weren't there, they were sent
22 home. They received instructions from Will Wirtz, as I
23 mentioned previously, about the quota to be raised, what entity
24 or for what purpose or for what particular business they would
25 raise that quota. That is, were they today going to be raising

1 money as The LaRouche Campaign or as some other entity?

2 They were to -- they were specifically told how much
3 money they were to raise, what kind of issues they would raise
4 in their discussion of fundraising with contacts. They would
5 then break, go to their offices, perhaps have short meetings
6 with their other people in their sectors.

7 And then they would take out contact cards, which would
8 have the names of the persons that they were planning to call.
9 They would call those persons and solicit the funds. This would
10 proceed until a certain point where there was a brief
11 interruption for lunch, and it would continue until dinner. And
12 then there would be another meeting to discuss the day's work in
13 fundraising, to discuss progress toward quota, to ventilate Will
14 Wirtz's anger and outrage if enough money hadn't been raised, to
15 congratulate the members if they had been raising the
16 appropriate amount of money. And then this process would
17 continue until late in the evening until finally the entire
18 national quota for the whole country was raised. That was
19 basically the daily cycle.

20 Q. All right. And do you have any knowledge of what activities
21 were going on in the regional offices while this activity that
22 you described was going on in the national office?

23 A. Yes.

24 Q. Tell the jury how it is that you have that knowledge of what
25 was going on in the regions.

1 A. One of the major topics of the discussion that Wirtz led --

2 Q. I'm sorry. That who led?

3 A. I'm sorry.

4 -- that Will Wirtz led during these two meetings that we
5 had daily in the national office was, How are the regions doing
6 and what are the regions doing? And he would motivate this
7 discussion using a blackboard with a grid of projected quotas of
8 income actually raised and so forth broken down on a region-by-
9 region basis. So you would actually see Baltimore is doing
10 great or, you know, Chicago is leading the way in this respect
11 or the other respect. And he would give us vignettes of the
12 organizing experiences, vignettes of the organizing experiences
13 that would be useful for fundraisers to, you know, maybe to try
14 out themselves in their contacts and so forth.

15 So there was an ongoing discussion on a daily basis not
16 only of the national office fundraising but also in the regional
17 component of the fundraising.

18 Q. One more time, if you could repeat for me, tell -- what
19 cities were encompassed in the New York region?

20 A. Okay. Well, cities encompassed in the New York region were
21 New York City and the metropolitan area, New Jersey where the
22 regional headquarters was at various times, and Boston,
23 Massachusetts encompassing, of course, the New England area.

24 Q. Did you ever hear Will Wirtz in these discussions that you
25 have described speak about the New York region's fundraising?

1 A. Yes.

2 Q. How frequently?

3 A. Virtually every day would include some discussion of the
4 regional fundraising that would at least touch on either in some
5 detail or simply in passing New York's role in the overall
6 effort.

7 Q. Now, how often did you physically observe, Mr. Tate,
8 fundraisers from the Labor Committee actually in the process of
9 raising money?

10 A. Well, during this period I observed such fundraising every,
11 single day.

12 Q. And what method did the fundraisers use to try to solicit
13 money from individuals?

14 A. How do you mean, what --

15 Q. How did they do it? Describe how they did it.

16 A. Well, what they would do is they would have at their
17 disposal a bunch of contact cards. The contact cards would have
18 the names and phone numbers and other information. They would
19 call up the contacts, and then they would try to motivate the
20 discussion based upon the briefing that they had during the
21 morning or afternoon meeting to raise money.

22 Q. Let me interrupt you for a second to slow it down a little
23 bit.

24 How often was it that you observed money being raised
25 by telephone as compared to going out and meeting people

1 individually to solicit money?

2 A. Well, the national office fundraising was almost exclusively
3 by telephone, and what I observed were individuals calling
4 people up on the phone and seeking to get them to give money by
5 these telephone conversations; specifically, seeking to get them
6 to make contributions by credit card over the telephone.

7 Q. All right. How often when you observed people attempting to
8 raise money by telephone did you observe them to be using
9 contact cards?

10 A. Almost invariably. Only in a very few cases would someone
11 not be calling directly from a contact card.

12 Q. And approximately how many times during the 1984 period did
13 you physically observe fundraisers on the phone using contact
14 cards?

15 A. I can't count. Hundreds of times. This was what almost
16 everyone in the national office was doing.

17 Q. Did you ever observe how these contact cards were initially
18 prepared?

19 A. Yes.

20 Q. Describe to the jury your observations in that regard.

21 A. Well, sometimes contact cards would be sent to the national
22 office by regional centers. One of the things that the
23 organization did was seek to meet people at airports and other
24 public places. Typically, persons met in these places would
25 have their names sent, prepared on contact cards, to the

1 national office or other centers for follow-up.

2 Also, contact cards were prepared off of lists of
3 subscribers to the organization's publications or other
4 publications or professional or fraternal or other groups that
5 the organization thought for some reason would have an interest
6 in its political activities. So those are the basic means by
7 which contact cards were initially prepared.

8 Q. And after they were prepared -- well, did you ever receive
9 any instructions from your superiors in the organization as to
10 what to do with contact cards after they had been prepared?

11 A. Yes.

12 Q. How often did you receive such instructions?

13 A. Well, I think probably only a few times in the beginning of
14 the 1984 period. It's a fairly simple and straightforward
15 procedure. After that, I think everyone followed it pretty much
16 as a matter of course.

17 Q. Do you remember who gave you these instructions?

18 A. No. I can't actually tell you a specific name. It was the
19 practice that we all followed in our fundraising to maintain
20 contact cards in a certain way, and I don't recall really who
21 told it to me first.

22 Q. All right. Well, would you describe the practice as to how
23 these cards were maintained?

24 A. Sure. The card would characteristically include the name,
25 the address, phone number of the contact, very often also the

1 credit card authorization number, and expiration date of the
2 credit card. There would be a summary of each phone call to the
3 contact, including the amount of money raised, for what purpose,
4 what the discussion was that led to the raising of that amount
5 of money, and special interests that the contact might have in
6 certain political areas that might be fruitful to exploit in
7 future phone contact with the contact for future fundraising.
8 Those were, you know, the essential pieces of information that
9 contact cards contained about any fundraising contact.

10 Q. Did you ever observe any fundraisers doing anything with the
11 contact cards while they were on the phone?

12 A. Yes. Fundraisers characteristically would make note of any
13 money that was given or any responses made to the fundraising
14 conversations so that, for example, if somebody did give \$500,
15 that would be written down. If somebody said, "Call me later,
16 I'm interested in the problem of drugs," or something like that,
17 that would be written down. So that there would be some kind of
18 capsule summary of the results of each discussion with the
19 contact.

20 Q. All right. And did you, yourself, ever raise funds, sir?

21 A. On a few occasions.

22 Q. And when you raised funds, did you ever raise them by
23 telephone?

24 A. Yes.

25 Q. And describe what you would do when you raised funds by

1 telephone.

2 A. Well, I did much less fundraising than most of the persons
3 in the national sector, so I was not as familiar with the
4 procedures. So, in fact, what I had to do was check with the
5 national finance office as to the correct procedure and --

6 Q. Who did you talk to, do you remember?

7 A. I'm not absolutely certain. I'm not absolutely certain. It
8 was whomever was functioning -- there was sort of a system
9 sometimes of runners who would go to the sectors and see how
10 they were doing. I think I grabbed whoever that person was on
11 that day, and what I was told to do and what I did was the
12 following:

13 When the person had indicated a willingness to give a
14 certain amount of money, I impressed upon this person the
15 importance of giving it by credit card rather than by, let's
16 say, sending a check. They agreed. I got a credit card chit, a
17 Mastercard or Visa credit card chit, and made the appropriate
18 entries. These included, of course, the authorization number,
19 the date, the expiration date, something indicating my sector,
20 which is the Security staff, my initials, the amount
21 contributed, and I'm -- I don't remember what else exactly. The
22 date probably.

23 Then I prepared my contact card for this person with
24 the information which I indicated before. I don't want to, you
25 know, necessarily go over that again, but name, address, phone

1 number, the rest, and a summary of what he discussed, the amount
2 of money that this person had agreed to give and so forth, so
3 that there would be a record of this person's interest, you
4 know, for future fundraising attempts.

5 Q. All right. Now, Mr. Tate, I'm putting in front of you and
6 the jury a document which I will mark as, if I can since I'm not
7 going to be admitting it, as Government's 1A for identification.

8 Can you see that from where you are, Mr. Tate?

9 A. Yes, I can. It's very clear.

10 THE COURT: Can the jurors see it?

11 THE JURY: Yes.

12 Q. Now that I've shifted it, can you see it?

13 A. Yes.

14 Q. Have you ever seen any document that looks like this
15 document before?

16 A. Yes.

17 Q. How often?

18 A. Well, hundreds of times.

19 Q. All right. What is this?

20 A. Well, this is a contact card. It's the type of document
21 that I was describing previously.

22 Q. All right. Now, I notice that in the upper left-hand corner
23 of Government's 1A for identification there is the name Mary
24 O'Reilly, correct?

25 A. That's correct.

1 Q. And how many times did the contact cards that you observed
2 have the name in that approximate location on them?

3 A. I would say invariably.

4 Q. All right. How about the address and the phone number?
5 Were they usually on the cards that you saw?

6 A. They were always on the cards and in approximately those
7 positions.

8 Q. All right. Now, how many times did you actually use contact
9 cards when you were fundraising?

10 A. Well, any time that I was fundraising I would use contact
11 cards or prepare contact cards if I was, let's say, calling off
12 of a cold list, off of a list which had not previously been
13 called for which there were not already contact cards prepared.
14 So that any time I did it, which is to say probably about a
15 dozen times during that year, uncharacteristically --

16 (Off the record)

17 A. I was just trying to clarify that a dozen times for a person
18 in the national office -- to fundraise only a dozen times
19 between January and August of 1984 is very, very low. Almost
20 nobody else did it so seldom. But on those dozen occasions
21 invariably I either called from contact cards or prepared
22 contact cards after my phone call.

23 Q. Did you ever actually raise money by telephone when you
24 solicited by phone?

25 A. Yes.

1 Q. When you did so, did you ever make any entries on contact
2 cards?

3 A. Oh, yes.

4 Q. How often?

5 A. Well, every time I raised money.

6 Q. What specific entries did you put on the contact cards on
7 the occasions when you were successful at raising money?

8 A. Well, the entry that I would put would include the date, the
9 amount of money raised, the purpose for which it was raised.

10 Q. What do you mean by "the purpose"?

11 A. When I say "the purpose for which it was raised," if it was
12 for The LaRouche Campaign or if it was for Campaigner

13 Publications or for Fusion Energy Foundation, whatever the

14 specific entity was to which the person had agreed to give the

15 money, that would also be indicated on the card; the subject we

16 had discussed, whatever it might have been, the threat of KGB

17 takeover; whatever it was that got that person to give money I

18 wrote down. And together with it I would write down whether

19 they gave the money by Mastercharge or Visa or whether they

20 agreed to send a check or what means was used for making the

21 financial transaction.

22 Q. All right. How often did you observe other fundraisers

23 engaged in activities similar to that which you have just

24 described in connection with the contact cards?

25 A. Every, single day --

1 Q. All right.

2 A. -- people were doing precisely that kind of procedure.

3 Q. Can you tell by looking at Government's Exhibit 1A based on
4 your experience what the entry -- the first dated entry means on
5 this contact card, which is Government's 1A?

6 A. Okay. It means that on 8/9/84 this individual gave \$100 to
7 the Independent Democrats for LaRouche, and this individual,
8 Mary O'Reilly, gave it on a Visa card.

9 Q. All right.

10 A. Then, as I look at this, it appears to be a summary of a
11 conversation and personal background on the individual. It
12 says, "Going to Ireland. Speaks German." That's a very big
13 point with the LaRouche people. They like Germans. "Has
14 pro-beam pals." That means people who like Star Wars is what
15 that means in LaRouche parlance. "Pro-beams" means like Star
16 Wars.

17 Then there's a later entry indicating a subsequent
18 contact on I guess it says 10/18. "45" would mean that she was
19 hit for \$45 at that time. This time she gave it as NDPC. I
20 realize this is like an alphabet soup. The NDPC is the National
21 Democratic Policy Committee. It's a group that I mentioned
22 before. The "NDPC/NS/SUB" means that she gave \$45 to purchase a
23 membership in the NDPC and a subscription to the New Solidarity
24 that I mentioned before. And she says that she is horrified at
25 Greens. Greens are not a vegetable. Greens are a West German

1 political party that's kind of ecologically-oriented, kind of
2 left wing. The organization was in a big upheaval against the
3 Greens at the time --

4 Q. All right.

5 A. -- et cetera. I don't mean to -- but that's -- anyway,
6 that's what -- if you will, that's sort of to decode what's
7 there in terms of what it means.

8 Q. When were you last in the national office?

9 A. On August 17, 1984.

10 Q. Why is it that you remember that day so specifically?

11 A. Oh, I mean, in my life that was a signal date. That was the
12 last day I had to put up with these people and this kind of
13 procedure. So I'll never forget that date.

14 Q. And on that date or as near to that date as you can recall,
15 approximately how many contact cards were there like that on the
16 premises?

17 A. I would have really no way of counting. What had happened
18 in 1984 was that every, single person in the national office
19 with very few exceptions was assigned to carry out full-time
20 fundraising activities, and each such person maintained contact
21 cards essentially like that for everybody that they spoke to who
22 proved to be of any possible value. So each of these persons,
23 more than a hundred persons in the national office, maintained
24 hundreds of cards just like that. So I can't even begin to
25 estimate just how many there were.

1 Q. You mentioned credit card chits, correct?

2 A. That's correct.

3 MR. MARKHAM: Can everybody see --

4 Q. Can you see this?

5 A. Yes.

6 MR. MARKHAM: Your Honor, may I ask through the Court
7 if the jury can see this?

8 THE COURT: Yes.

9 All right.

10 BY MR. MARKHAM:

11 Q. What is this?

12 A. Well, that's a credit card chit.

13 Q. Now, you testified that when you were fundraising, you
14 prepared these slips, correct?

15 A. Yes.

16 Q. And on what occasions would you actually write out credit
17 card chits like this?

18 A. Well, when I -- when someone I had called had agreed to give
19 money by credit card for one or another of these entities, these
20 businesses, then I would get a credit card chit like this and
21 fill it out.

22 Q. All right. And what information did you put on the credit
23 card chits when you filled them out?

24 A. Well, the information that I put on was the authorization
25 number, which is the number -- I believe it's the number in the

1 upper left-hand corner. That's the general type of number. The
2 date, the expiration date of the credit card. As I mentioned
3 before, the sector that I was in, which in my case was Security,
4 would be entered on the credit card under the -- in the little
5 box that says "Department." I'm not sure if that's clearly
6 visible to everybody, but there it is. Of course, I put my
7 initials in that box. The date. I believe I entered the date.
8 The purpose for which the money was raised, the amount and the
9 total.

10 Q. All right. And was there ever an occasion on which you
11 raised money by telephone by credit card that you did not do
12 what you have just described in connection with the credit card
13 slip?

14 A. No. That's precisely what I did. The one thing which --
15 the one entry I didn't make -- at least the one entry I didn't
16 make was the authorization number. That was handled in a
17 separate team in my case. Someone else called in the credit
18 card through the clearing agency and entered the authorization
19 number.

20 Q. Do you know whether they did that before or after you had
21 filled out the rest of the card -- the rest of the chit?

22 A. I had filled out the rest of the chit, whatever the
23 organizer was supposed to fill out, those categories, before I
24 handed it over to them for clearing.

25 Q. And what did you do with the credit card slips after you had

1 prepared them as you have described?

2 A. I gave them to the national finance office.

3 Q. Is that in the same building?

4 A. Yes.

5 Q. And who was in the national finance office that you gave
6 them to?

7 A. You know, the truth is I don't remember to which individual
8 I handed the one or two credit card chits that I filled out. I
9 know the people who were there who might have gotten it, but I
10 don't know which one specifically I handed it to.

11 Q. Mr. Tate, during the 1984 campaign what were you doing if
12 you weren't raising money?

13 A. Well, during the 1984 period I was still, as I mentioned
14 before, on the Security staff of the organization.

15 Q. And how long had you been on the Security staff?

16 A. I joined the Security staff in 1981 and I had been working
17 with them informally for several years prior to that.

18 Q. All right. Prior to starting to work on the Security staff,
19 what activity were you engaged in at the Labor Committee?

20 A. Prior to my being put on the Security staff, I worked in the
21 organization's press staff, sort of a -- well, actually there
22 were two things.

23 I worked in the organization's press staff, which is
24 sort of a -- I guess I'd have to sort of describe it as a public
25 relations arm of the organization. It contacts reporters. It

1 puts out press releases, et cetera. And then I went from there
2 to working with the organization's publications --

3 Q. If I can interrupt you to tell you that I think you're
4 speeding up.

5 A. Okay. Thank you.

6 Subsequent to working on the press staff, I worked on
7 the organization's publications, writing for New Solidarity,
8 Campaigner, which is one of its magazines, and so forth. Those
9 were my principal assignments before I joined the Security
10 staff.

11 Q. You indicated that during that time period before you
12 started working with Security you actually had some contact with
13 Security?

14 A. Yes. That's right.

15 Q. What kinds of contacts did you have during the period
16 immediately before you started working for Security?

17 A. Well, they were two-fold. One is that I was among a number
18 of persons pulled in to augment the Security staff's sort of
19 physical security component. That is, I would be assigned to do
20 security shifts at the LaRouche residence or other places where
21 the organization felt that there was some threat of attack by
22 possible forces. There were a number of persons not formally
23 assigned to the staff who were pulled in to help Security do
24 that kind of thing, and I functioned in that capacity.

25 Secondly, because of the work on the press staff, I

1 worked closely with the Security staff in monitoring reporters
2 and other people in the media who might be inclined to write
3 articles about Mr. LaRouche which would be unflattering and
4 which he wouldn't want to have appear. So in these two
5 capacities I would work with the Security staff for some time
6 before actually joining the staff.

7 Q. And before joining the staff, did you have any discussions
8 with anybody about joining the staff?

9 A. Yes.

10 Q. With whom did you have those discussions?

11 A. Chiefly with Robert Greenberg.

12 Q. And as of the time you had those discussions, what was
13 Robert Greenberg's function?

14 A. Robert Greenberg was then a member of the Steering Committee
15 of the Security staff, which is the group which sort of runs the
16 staff on a day-to-day basis and the group which most directly
17 comes into contact with Lyndon and Helga LaRouche.

18 Q. Did you actually join the Security and Intelligence staff
19 after those discussions?

20 A. Yes.

21 Q. And when was that, again?

22 A. That was in 1981.

23 Q. Do you remember when in 1981?

24 A. I believe it was in June -- somewhere between June -- I
25 think in June.

1 Q. When you joined this Security and Intelligence staff, were
2 you on its Steering Committee?

3 A. No.

4 Q. Were you ever on its Steering Committee?

5 A. No.

6 Q. Who was on the Steering Committee besides Robert Greenberg?

7 A. Okay. The members of the Steering Committee were Paul
8 Goldstein, Jeffrey and Michele Steinberg, Robert Greenberg,
9 Robert Kay; at an earlier point, also Zeke Boyd.

10 Q. Was there a person on the Steering Committee that was
11 overall in charge?

12 A. Yes.

13 Q. Who?

14 A. Paul Goldstein was the director of the Security staff. He
15 worked in that capacity in very close association with Jeff
16 Steinberg.

17 Q. And after you came on board the Security and Intelligence
18 staff, how long did you stay on the staff?

19 A. Until I left the organization in August 1984.

20 Q. And where did the Security and Intelligence staff have its
21 offices?

22 A. The offices were in the national office complex on
23 58th Street.

24 Q. And how many -- well, was it a separate area, or was it
25 comingled with everybody else?

1 A. Well, it was a small suite of rooms at one end of the --
2 basically at one end of a long hall that led to most of the
3 national office. In total, it comprised four small connected
4 rooms.

5 Q. All right. Did you have your own private office?

6 A. No.

7 Q. Did you have an area where you normally worked from?

8 A. Not really. Everyone was sort of all over -- all over the
9 place. There were occasional efforts -- there were occasional
10 campaigns to assign people desks and things of this nature, but
11 these broke down very, very quickly.

12 Q. How much of the day during your daily activities at the
13 Security and Intelligence staff were you physically able to
14 observe other members of the Security staff and what they did?

15 A. Pretty much all the time. The rooms were connected; and
16 except in the rare circumstances when the members of the
17 Steering Committee closed their door -- they had basically two
18 rooms for their use -- you could see and hear practically
19 everything that was going on.

20 Q. Now, after you got on the Security and Intelligence staff,
21 what is the first activity that you engaged in, do you remember?

22 A. When I first joined?

23 Q. Yes.

24 A. Well, I don't remember the very first. I know that the --
25 I remember what the usual entry-level assignment was, which was

1 to function as what was called the Officer of the Day.

2 Q. What is --

3 A. The Officer of the Day --

4 Q. Did you ever function as the Officer of the Day?

5 A. Yes.

6 Q. Who told you to function as the Officer of the Day?

7 A. One or another of the members of the Steering Committee,
8 usually Jeff or Michele.

9 Q. What did they tell you to do as Officer of the Day -- well,
10 before you state that, how often did you function as Officer of
11 the Day during your three years with the Security staff?

12 A. I'd have to estimate that I performed that function
13 somewhere in the area of a hundred times.

14 Q. Were the responsibilities of the Officer of the Day usually
15 the same?

16 A. Yes.

17 Q. What did you do when you were Officer of the Day?

18 A. You prepared a press report, which is a sort of summary of
19 what the newspapers had in them of interest to the Security
20 staff that day. You answered the telephone, basically took
21 incoming calls, saw to it that everybody's reports were collated
22 into a final intelligence packet that could be submitted to
23 Mr. and Mrs. LaRouche and to the National Executive Committee at
24 the conclusion of the day. Those were the essential functions.
25 And also, to handle some of the logistical matters; that is to

1 say, getting money if the staff needed money, seeing to it that
2 essentials were purchased and stuff like that.

3 Q. When you came on board the Security staff, did anybody tell
4 you what its functions were?

5 A. Well, at the point at which I joined the staff I had been a
6 member of the organization either for eight or ten years,
7 depending upon how you start counting, so I knew at that point
8 very well what the functions of the staff were without being
9 expressly told.

10 Q. And how is it that you came to know that?

11 A. Well, through descriptions ongoing about the function of the
12 Security staff beginning in 1973 and increasing in 1974 which
13 were disseminated to all members about what its role was to be
14 within the organization. And then, of course, through my
15 interaction with the Security staff from the period 1978 or so
16 when I was kind of pulled in as an auxilliary I was able to
17 participate in many of these functions and, therefore, I knew
18 what they were first hand.

19 Q. And was there any change that you noticed in the functions
20 of the Security staff from the time you got on it in 1981 until
21 the time you left in August of 1984?

22 A. No. I would say throughout that entire period the functions
23 were the same.

24 Q. What were their functions?

25 A. Well, I would say that they were the following: First, to

1 act as Lyndon and Helga LaRouche's eyes and ears; that is to --

2 Q. What do you mean by that?

3 A. Well, by that, I mean to collect intelligence -- I use that
4 word advisedly -- about what was going on in the world
5 situation, about what happened domestically, particularly with
6 respect to such areas as espionage, international arms dealing,
7 international strategic policy and things of that nature.

8 Secondly, it was their business to find out about any
9 possible situations which might be to the general detriment of
10 the LaRouches, articles in the press that were critical of
11 LaRouche, government or other investigations of LaRouche and his
12 organizations that might prove to be detrimental. In other
13 words, they were sort of to function as -- well, as a, you know,
14 kind of a first line of defense of the organization against
15 these kinds of attacks. In tandem with that, if such attacks,
16 articles in the press, government investigations, whatever
17 loomed or were thought to loom, it was the Security staff's
18 function, role and responsibility to -- the word that we used
19 was counterpunch against persons who were so venal as to
20 criticize Lyndon LaRouche in any way by counter- -- well, I can
21 describe what I mean by counterpunching in more detail.

22 To sort of finish off the other functions, the Security
23 staff also acted really as kind of a household staff of Lyn and
24 Helga. At this point they did the shopping; they did the
25 cooking; they provided for the physical comfort, wants and well-

1 being of the LaRouches personally.

2 They also carried out physical security assignments.

3 They would, you know, stand around the house with guns and other
4 weapons to defend the LaRouches, who believed themselves always
5 to be the targets of innumerable assassination conspiracies
6 emanating from all manner of people. So the Security staff was
7 supposed to guard the LaRouches against these assassination
8 plots -- these purported assassination plots.

9 Then the Security staff had as its responsibility
10 acting kind of as -- acting as sort of an internal -- well, you
11 might say order guard within the organization; in other words,
12 seeing to it that any dissent in the organization was quickly
13 picked up, dealt with and either quenched, you know, before it
14 got to the flaming stage or else was expelled. In other words,
15 if the Security staff got wind that somebody was disaffected in
16 some way, if they didn't agree with something, it was their
17 responsibility to see to it that the appropriate individuals
18 intervened real fast before it became a problem. So that was
19 another function of the Security staff.

20 So basically, it had a variety of functions, most of
21 which can be summarized as acting as the personal and direct arm
22 of Lyndon LaRouche and the organization; intelligence gathering,
23 you know, group for Lyndon LaRouche in the outside world,
24 especially in those areas which I indicated, strategic policy,
25 intelligence and espionage and so forth. So those were the

1 essential functions of the -- and, you know, running the
2 organization's internal affairs and guarding LaRouche physically
3 and providing for his physical well-being. Those really were
4 the functions of the Security staff.

5 Q. And those were the functions that you observed them carrying
6 out during the three years that you were on the staff?

7 A. Yes. I not only observed them but also took part in these
8 functions.

9 Q. I think I have five, but let me see if I got all the ones
10 that you mentioned.

11 The first one you mentioned was acting as Lyndon
12 LaRouche's eyes and ears?

13 A. That's right.

14 Q. The second was discovery of any potentially detrimental
15 situations existing in the press or wherever?

16 A. Right.

17 Q. Third was what you called counterpunching?

18 A. That's right.

19 Q. Four is acting as household staff?

20 A. Right.

21 Q. And five is what you called internal monitoring?

22 A. That's right.

23 Q. Now, did anybody provide physical security for Mr. LaRouche
24 at any time?

25 A. Yes. I believe I touched upon that. The Security staff

1 provided physical security for Lyn and Helga LaRouche and other
2 -- chiefly them, but also other persons in the organization. It
3 was the LaRouches' constant belief --

4 Q. Well --

5 A. All right.

6 Q. -- let me --

7 A. Yes.

8 Q. Let me ask you this question.

9 Did you ever hear Lyndon LaRouche -- well, have you
10 ever met Mr. LaRouche?

11 A. Oh, of course.

12 Q. How many times have you seen him?

13 A. Hundreds of times.

14 Q. How many times have you heard him speak?

15 A. Dozens -- I mean, speak publicly or speak personally --

16 Q. How many times have you heard him speak publicly?

17 A. Scores of times.

18 Q. How many times have you actually participated in
19 conversations directly with Mr. LaRouche?

20 A. Dozens of times.

21 Q. Have you ever had conversations with Mr. LaRouche about his
22 belief as to why he needed security?

23 A. Yes.

24 Q. And what did he tell you in that regard?

25 A. Well, in that regard he said very expressly that all manner

1 of persons were out to kill him.

2 Q. Did he ever tell you -- express the belief as to who he
3 believed was out to kill him?

4 A. Well, there were different persons at different times but,
5 yes, he had a number of candidates for this role.

6 Q. Can you think of any?

7 A. Sure. Henry Kissinger was often top of the list. The Queen
8 of England had a hand in it. So did Gorbachev. Various and
9 sundry former members of the organization, you know, surely were
10 implicated. All manner of persons on the far right, on the far
11 left. Let me see. I think Jimmy Carter was involved at one
12 time. It's so hard to, you know, remember all the names. There
13 were -- the Baader-Meinhof gang.

14 Q. Can you spell that for the Reporter?

15 A. Yes. I'm sorry. It's B-a-a-d-e-r-M-e-i-n-h-o-f,
16 Baader-Meinhof gang, a West German terrorist gang. There are
17 others. I can go on almost indefinitely, but these are some of
18 the individuals who were involved in these assassination plots
19 at various times.

20 Q. Now, did you ever have any discussion with any members of
21 the Steering Committee as to their belief with respect to these
22 assassination plots?

23 A. Yes.

24 Q. Specifically, did you ever have any discussions with Jeff
25 Steinberg on this subject?

1 A. Oh, yes.

2 Q. Did he ever express any beliefs to you on this subject?

3 A. Yes, constantly.

4 Q. What beliefs did he express to you?

5 A. Well, he always expressed the conviction and belief that
6 whatever assassination plot Lyn had announced was ongoing had to
7 be deterred by whatever means or else -- I'm -- you know, I'm
8 sorry, it's almost too silly to restate. But basically,
9 Steinberg would always say that whatever assassination plot was
10 currently believed to be unfolding had to be stopped, and he
11 expressed the sincerest conviction that, you know, it was going
12 ahead full steam.

13 Q. Did he ever express to you his view on whether or not this
14 was silly?

15 MR. WALKER: Objection.

16 THE COURT: I sustain the objection.

17 Q. All right. Did he ever express to you any belief as to
18 whether or not he thought these plots were credible?

19 A. Oh, absolutely.

20 MR. WALKER: Objection.

21 THE COURT: The objection is overruled. The question
22 and answer may stand.

23 MR. MARKHAM: I'm sorry. I just heard the objection.
24 I didn't hear the answer.

25 THE COURT: The objection is overruled. The question

1 and answer may stand. The answer may be read back.

2 (The record was read as requested.)

3 BY MR. MARKHAM:

4 Q. Okay. What was his belief in that regard?

5 A. His belief --

6 MR. WALKER: Well, objection, your Honor. That -- what
7 was Mr. Steinberg's belief?

8 MR. MARKHAM: As expressed by Steinberg. 803(3).

9 THE COURT: Well, there is a problem with the form of
10 the question.

11 MR. MARKHAM: Let me start over, if I may.

12 THE COURT: All right.

13 BY MR. MARKHAM:

14 Q. Did you ever have any discussions with Jeff Steinberg in
15 which he expressed his belief on the subject of assassination
16 attempts of Lyndon LaRouche?

17 A. Yes.

18 Q. How many times did you have such discussions?

19 A. Scores of times.

20 Q. What did Mr. Steinberg express as his belief?

21 A. That these persons, the ones that I named, and others were
22 involved in a conspiracy to assassinate Mr. LaRouche.

23 Q. All right. And did he ever express to you his belief as to
24 whether or not he thought these plots were genuine or credible?

25 MR. WALKER: Objection.

1 A. Yes.

2 THE COURT: Objection overruled. The answer may
3 stand.

4 Q. The answer was "yes," again?

5 A. Yes.

6 Q. And what did he say in that regard?

7 A. Well, many things. He would give instructions based upon
8 this belief to me and others to write press releases exposing
9 the various and sundry sinister conspiracies which he and others
10 believed to exist.

11 We would be instructed to call the offices or homes of
12 various of the principals believed to be participating in these
13 assassination plots and confront them with the evidence which we
14 had accumulated of their perfidy. We, you know, were carrying
15 out other activities at his direction such as -- or the
16 direction of other members of the Steering Committee to augment
17 physical security at Mr. and Mrs. LaRouche's premises in
18 anticipation of these coming waves of assassins. So that not
19 only, you know, did he tell me expressly that these things were
20 going on and that he believed them, but he told me and others to
21 go and do things on the basis of this belief expressly to
22 counter these threats.

23 Q. Did you ever have any such discussions with other members of
24 the Steering Committee?

25 A. Yes.

1 Q. With Paul Goldstein?

2 A. Yes.

3 Q. How frequently did you have discussions about his beliefs in
4 these assassination plots?

5 A. Well, these are hard to quantify, but certainly, you know, a
6 dozen times, a score of times.

7 Q. And describe generally what Mr. Goldstein would express to
8 you as his belief about these assassinate plots.

9 A. Well, he expressed conviction that these plots were
10 underway, and usually he would do this in the form of expressing
11 outrage that you and others weren't doing enough to keep these
12 plots from succeeding. So you usually would -- he would say
13 literally, "Lyn's life is in danger and you're not doing --" I
14 don't want to use the expressions "-- about it."

15 I don't want to use the language he used. He was
16 somewhat --

17 Q. Well --

18 A. Hm?

19 Q. Well --

20 A. All right. He would usually motivate -- try to motivate us
21 to do things by using vulgar and violent language in which he
22 would emphatically state his belief that Lyndon LaRouche's life
23 is in danger and we weren't doing anything about it.

24 Q. Did you have discussions on this subject with Michele
25 Steinberg?

1 A. Yes.

2 Q. And with Robert Greenberg?

3 A. Yes.

4 Q. Now, let's go to the first of the topics that you mentioned,
5 that the Security staff functioned as LaRouche's eyes and ears.

6 Describe what you observed members of the staff doing
7 when they were performing that function.

8 A. Well, they did a variety of things. Probably most of their
9 time was used in placing phone calls on pretexts. That is, they
10 would call up and say, I'm a reporter for the Boston Globe, for
11 the New York Times, for the Financial Times of London. What do
12 you think about whatever the subject of Mr. Larouche's interests
13 might be, usually Mr. LaRouche. So you would call up and you
14 would say, "I'm from the Financial Times of London and what do
15 you think about Lyndon LaRouche?" And you would get some kind
16 of answer. And this pattern of responses would be written up
17 as, you know, part of the day's intelligence product.

18 So I would say, first of all, most of the people in the
19 Security staff in seeking information would make direct phone
20 calls of this sort or other contacts under these false pretexts
21 to get information.

22 Secondly, the --

23 Q. Well, now, if I can --

24 A. I'm sorry.

25 Q. If I can interrupt you for a second.

1 How frequently did you observe members of the Security
2 staff calling up to make these pretext calls that you have just
3 described?

4 A. Hundreds of times.

5 Q. Did you yourself ever do this?

6 A. Yes.

7 Q. How frequently?

8 A. Hundreds of times.

9 Q. All right. Now, when you observed the other members of the
10 Security staff undertaking these calls, did you observe them
11 doing anything after the calls with the information they had
12 obtained?

13 A. Well, yes. Well, first of all, during the call they would
14 write down what they were hearing on the other end from the
15 person to whom they were speaking. And then if there was any
16 usefulness in it according to their view, they would report on
17 the substance of the call either immediately to the leaders of
18 the Security staff, the members of the Steering Committee I've
19 already mentioned, or they would report it at the twice-daily
20 meetings the Security staff held.

21 Q. Now, did you ever observe members of the Steering Committee
22 make these pretext phone calls?

23 A. Yes.

24 Q. And what did you observe the Steering Committee members to
25 do while they were making these phone calls?

1 A. Well, again, the Steering Committee members when making
2 these kinds of pretext phone calls would typically write the
3 substance of what was being discussed in their notebooks. Very
4 often, also, not only Steering Committee members but also the
5 regular members of the Security staff would tape-record these
6 conversations, so that there would be a record of their
7 undercover call, as we liked to call them.

8 Q. Now, how many times did you see Jeffrey Steinberg on the
9 phone making pretext calls?

10 A. Hard to give a precise number. Scores of times perhaps.

11 Q. How about Michele Steinberg?

12 A. She -- again, I guess I'd have to say a dozen times or so.

13 Q. How about Robert Greenberg?

14 A. A dozen times. Hard to give a number, but they made such
15 calls in my presence. I can remember maybe in each half a dozen
16 occasions or so specifically that they were doing it, who they
17 were talking to, why they were doing it and so forth.

18 Q. And how about Jeff Steinberg?

19 A. Jeff Steinberg, yes. Also Jeff Steinberg.

20 Q. How often when they were doing these types of calls did you
21 observe them to write in their notebooks?

22 A. Pretty much invariably. If they had -- I guess I should
23 add, though, that if they were tape-recording the phone call,
24 they might or might not be so punctilious about the entry in the
25 notebook; after all, there was another record. Most commonly if

1 there was a tape-recording of the phone call, they would type it
2 up at a later point. They would produce a transcript at a later
3 point. But there would still usually be some record that a
4 phone call was made.

5 Q. On occasions when they were not taping the phone call, how
6 frequently was it that these pretext calls were the subject of a
7 notebook entry?

8 A. Invariably. I think invariably in any case because even if
9 it were taped, they would want something off of which they could
10 make a verbal briefing either to Lyndon LaRouche and/or to the
11 Security staff about their call.

12 Q. Now, apart from these pretext calls that you have described,
13 did you ever observe Goldstein or the Steinbergs or Greenberg on
14 the telephone speaking to other people where they were not
15 acting under pretext?

16 A. Yes.

17 Q. How frequently?

18 A. On a daily basis.

19 Q. How frequently on a daily basis?

20 A. Hard to give an exact number. There were a fair number of
21 persons who were maintained as sources or paid as consultants
22 providing information on topics of interest to the LaRouches, to
23 the Security staff.

24 Q. And did you personally ever call those consultants or
25 sources?

1 A. Now and again.

2 Q. Did you ever observe Jeff Steinberg, Michele Steinberg, Paul
3 Goldstein or Robert Greenberg making such calls?

4 A. Yes.

5 Q. Did you observe them to make those calls more or less
6 frequently than you?

7 A. Oh, much more frequently.

8 Q. Why was it that you didn't make those calls as frequently?

9 A. Well, they were further up in the organization's hierarchy
10 and on the Security staff hierarchy. They were the members of
11 the Security Steering Committee, and they were the persons who
12 most commonly would have the direct responsibility for
13 communicating the information to Lyndon LaRouche. So that they
14 would be most commonly the persons directly to have dealings
15 with these sources and consultants.

16 Q. Now, how frequently did you observe these four Steering
17 Committee members to be making calls to consultants and sources
18 as compared to the calls that they made under pretext as
19 newspaper reporters or whatever?

20 A. Or whatever. I think that they were making the balance of
21 their phone calls to the consultants and sources rather than to
22 -- rather than in an undercover pose. They devoted more of
23 their time to maintaining contacts with the sources and the
24 consultants than they did, you know, calling people on pretexts.

25 Q. What did you observe them to be doing when they were on the

1 telephone speaking with their sources or consultants?

2 A. Well, especially when they were speaking to sources and
3 consultants, they wrote down very, very carefully what it was
4 being said to them by these sources and consultants.

5 Q. Specifically, did you ever see Jeffrey Steinberg speaking on
6 the telephone when, by what he was saying, he indicated he was
7 speaking to a source or a consultant?

8 A. Yes.

9 Q. How frequently?

10 A. Hundreds of times.

11 Q. How often when he was doing that was he writing in his
12 notebook?

13 A. I'd say every, single time, 99 percent of the time.

14 Q. How often did you see Paul Goldstein speaking to sources or
15 consultants on the telephone?

16 A. Scores of times.

17 Q. How frequently on those occasions did you observe him to be
18 using his notebooks while he was in the conversation?

19 A. Well, he was always writing things down. He was less
20 punctilious in -- all right. He was always writing something
21 down.

22 Q. I'm not -- I'm going to -- would you describe to me what you
23 mean by "punctilious"? I'm sorry. You've used that twice, and
24 I let it go by the first time.

25 A. All right. He -- all right. He entered in less detail in

1 his notebook and, you know, was somewhat more impulsive about
2 making his entries than was Jeff, who was very, very careful and
3 was always writing as he was talking. Is that a -- that's what
4 I mean by "punctilious."

5 Q. Thank you. I just didn't understand what the word meant.

6 A. Okay. Sorry.

7 Q. All right. How about Michele Steinberg? How frequently did
8 you observe her on the phone speaking to sources or consultants?

9 A. Whenever Michele was on the phone speaking to a source or
10 consultant, basically she would be making a notebook entry
11 almost invariably.

12 Q. How about Robert Greenberg?

13 A. Once again, it was -- it's the same. He would also make
14 notebook entries when talking to sources or consultants.

15 Q. Now, did you ever observe -- going back to the beginning to
16 Jeff Steinberg again.

17 Did you ever observe Jeff Steinberg to do anything with
18 the notebook entries after he had written them from the phone
19 calls?

20 A. Yes.

21 Q. What did you observe him to do?

22 A. Well, he would use the notebook entries as the basis for
23 briefing other persons.

24 Q. Who, specifically, did you see Jeff Steinberg using his
25 notebooks to brief?

1 A. Okay. He would be briefing most typically either Lyndon
2 LaRouche, whether in person or on the phone; sometimes other
3 members of the National Executive Committee; and members of the
4 Security staff in our Security staff meetings. And he would use
5 his notebooks -- he would basically be reading from his
6 notebooks or summarizing the entries in his notebooks during
7 those meetings.

8 Q. Did you ever speak to Jeffrey Steinberg about his notebooks?

9 A. Yes.

10 Q. Did he ever tell you what he was using these notebooks for?

11 MR. WALKER: Objection, your Honor.

12 MR. MARKHAM: I'll withdraw the question.

13 Q. What did he say about his notebooks when you spoke to him?

14 MR. WALKER: Objection, your Honor.

15 THE COURT: Ground?

16 MR. WALKER: Well, I'm not sure what -- hearsay, your
17 Honor.

18 THE COURT: Objection is overruled.

19 A. Well, in our discussions about the notebooks he would
20 sometimes --

21 MR. WALKER: If your Honor please, excuse me, can I
22 just make a further point? Could we ask for the date of these
23 discussions?

24 THE COURT: All right.

25 BY MR. MARKHAM:

1 Q. How often -- I'll do it this way. How often did you have
2 occasion to speak with Jeff Steinberg about his notebooks?

3 A. Maybe half a dozen times.

4 Q. Do you remember the dates on which you spoke to him?

5 A. I'm afraid not, no.

6 Q. Do you remember whether it was before or after you arrived
7 on the Security staff in 1981?

8 A. It was certainly after I was on the Security staff.

9 Q. Was it before or after you left the organization?

10 A. It was before I left the organization.

11 Q. Can you pinpoint any more directly when the conversation
12 took place during that time period?

13 A. Well, one that strikes -- that I remember somewhat more
14 vividly.

15 Q. To start, just say -- if you could answer that one "yes" or
16 "no."

17 A. All right. Please excuse me. Yes.

18 Q. All right. When can you pinpoint it to?

19 A. It was sometime I think in 1983. I can tell you why I think
20 it was '83 if you like.

21 Q. That was going to be my next question.

22 How do you know it was 1983?

23 A. I believe it was after the purchase of the Wang computer
24 which, as I remember, was in 1983. And the reason why I
25 remember this is that Jeff Steinberg asked me to write a press

1 release or a memo on some topic for which there was information
2 in his notebook, and he had he handed me his notebook and said,
3 "Write this up. These are the facts that I want in the memo.
4 Write this up." And I remember going with the notebook to the
5 Wang computer and sitting down. And that's how I remember that
6 it was in that time period. But I'm afraid I just don't recall
7 the date.

8 Q. All right. Now, you recall the other conversations you had
9 with Mr. Steinberg on the notebooks to be within the period of
10 '81 and '84, correct?

11 A. Yes.

12 Q. And do you recall anything else during that period that he
13 said to you about his notebooks?

14 A. Uhm --

15 MR. WALKER: Well, if your Honor please, I guess I will
16 -- I will object.

17 THE COURT: Ground?

18 MR. WALKER: Hearsay.

19 THE COURT: What exception do you rely on?

20 MR. MARKHAM: State-of-mind exception.

21 MR. WALKER: Well, I guess I'll withdraw the objection.

22 THE COURT: All right.

23 A. I'm sorry. Could you repeat the question?

24 Q. Yes. What was it Mr. Steinberg said to you on these
25 occasions about his notebooks?

1 A. Well, in some cases when I would be giving him information
2 or someone in my presence would be giving him information, he
3 would say things like, "Slow down a second. I've got to get
4 this down in my notebook." Or he would -- we sometimes would
5 exchange sort of, you know, jocular asides about how carefully
6 his notebooks were kept and how orderly, you know, he maintained
7 his notes and things of that nature. Those are a couple
8 examples that come to mind of discussion of his notebooks.

9 Q. All right. Now, did you ever observe Jeffrey Steinberg
10 speaking directly face to face with Lyndon LaRouche?

11 A. Yes.

12 Q. How frequently?

13 A. Dozens of times.

14 Q. And did you ever observe him in -- well, do you remember any
15 of those conversations?

16 A. Not offhand.

17 Q. Do you remember the general subject matter of any of those
18 conversations?

19 A. Yes.

20 Q. What were they?

21 A. Well, the general subject matter is -- fell under the areas
22 of reports from sources, appraisals of international or domestic
23 situation, internal developments in the organization that seemed
24 worrisome or important to Mr. Steinberg that he felt
25 Mr. LaRouche should know about, and then, of course, a certain

1 amount of, you know, casual back and forth.

2 Q. Now, how frequently did you observe Jeff Steinberg giving
3 Mr. LaRouche reports of sources?

4 A. Perhaps half a dozen times.

5 Q. Did you ever observe him to be doing that over the
6 telephone?

7 A. Yes.

8 Q. How frequently?

9 A. Scores of times. I answered the first question as to when I
10 saw it with my eyes. I heard it much more often over the phone.

11 Q. All right. On the occasions when Mr. Steinberg was briefing
12 Mr. LaRouche on a report from a source, how did you observe him
13 to do that?

14 A. Well, invariably he would have his notebook open and he
15 would clearly be going down the columns in the notebook reading
16 off or summarizing what he had written in his notebook.

17 Essentially, it was his "aide memoire," if you will, for
18 briefing Mr. LaRouche, the notebook.

19 Q. Did you ever observe Mr. Steinberg face to face briefing
20 Mr. LaRouche about a report from a source when he did not have
21 his notebook?

22 A. No.

23 Q. Did you ever observe Jeff Steinberg speaking on the
24 telephone to Mr. LaRouche and giving a source report when he did
25 not have his notebook?

1 A. No.

2 Q. Did you ever observe Michele Steinberg to brief LaRouche?

3 A. Yes.

4 Q. More or less frequently than Jeff Steinberg?

5 A. Less frequently than Jeff.

6 Q. When she briefed him, did you ever hear her brief him about
7 source reports?

8 A. Yes.

9 Q. And how did she do it?

10 A. Well, again on the basis of notebook entries.

11 Q. How about Paul Goldstein?

12 A. Yes. I also heard Paul Goldstein brief Mr. LaRouche.

13 Q. And how did he do it?

14 A. Well, to the best of my recollection, he would have a
15 notebook or notepad with him and he would be briefing off of his
16 notebook or notepad. As best I can determine from the tenor of
17 his voice and the attitude of his body and stuff, he was a
18 little more inclined to wing it than Michele and Jeff Steinberg
19 with respect to, you know, following strictly the notebook
20 entry.

21 Q. All right. How about Robert Greenberg?

22 A. Robert Greenberg also used his notebook in briefing
23 Mr. LaRouche and others.

24 Q. Now, did you ever have occasion to physically look into the
25 notebook of Jeff Steinberg?

1 A. Yes.

2 Q. How frequently?

3 A. Several times. Half a dozen perhaps.

4 Q. Did you ever, in addition to those times, observe him
5 writing in his notebooks?

6 A. Yes. I observed him writing in his notebook on a daily
7 basis.

8 Q. All right. And how often did you get close enough to
9 actually observe the writing itself?

10 A. On most occasions when we had staff meetings we were sitting
11 around in a circle, and I could easily see -- it was inescapable
12 to see his notebook and, also, even to see the entries on the
13 pages.

14 Q. All right. So how many times is it that you have observed
15 the notebook entries in Mr. Steinberg's notebook?

16 A. Well, including casual observation and actually looking or
17 reading the notebook for specific information, I probably would
18 have to say a score of times.

19 Q. What do you mean by "a score of times"?

20 A. Twenty times, twenty-five times. These, of course, are hard
21 to -- I wasn't ticking off, you know, how many times have I seen
22 Jeff's notebooks when I was doing this, but something in that
23 order.

24 Q. How many times have you had an occasion to observe Michele
25 Steinberg's notebooks?

1 A. Well, again, whenever the Security staff had a meeting,
2 Michele was making entries in her notebook; and whenever she was
3 on the phone, she was making entries in her notebook. So in
4 that sense I saw her notebook hundreds of times.

5 Q. All right. And how often did you get an opportunity to
6 observe her handwriting in her notebooks?

7 A. I don't think more than two or three times. I had other
8 occasions to observe her handwriting, however. But in her
9 notebooks per se a couple times, two or three times.

10 Q. Incidentally, apart from Jeff Steinberg's notebooks, did you
11 have occasion to observe his handwriting at other times?

12 A. Yes.

13 Q. How frequently?

14 A. Hard to say. A dozen times perhaps.

15 Q. And how about Michele Steinberg? Overall how many times
16 have you seen her handwriting?

17 A. Perhaps a dozen times.

18 Q. And how about Robert Greenberg?

19 A. Well, I think, you know -- well, there again -- are you
20 asking about the handwriting?

21 Q. Yes.

22 A. A dozen times or so, maybe more, twenty times. Robert
23 Greenberg's responsibilities somewhat more directly guiding, you
24 know, sort of guiding the staff in its specific work, he would
25 sometimes write things out that you would have to read, little

1 notes or a list of people to call or something of that sort. So
2 I perhaps saw his handwriting a bit more often than Michele's,
3 Michele Steinberg's.

4 Q. And how about Paul Goldstein?

5 A. Well, I saw Paul Goldstein's handwriting on a number of
6 occasions. I don't remember precisely how often. And I must
7 say that I chiefly saw his handwriting when I was working in New
8 Solidarity and he would hand in articles and he would have
9 things written in the margins. So I saw his handwriting less
10 often, I guess, than the others.

11 Q. All right. Now, did you, sir, keep your own notebook?

12 A. Yes, I did.

13 Q. And what reason did you have for keeping notebooks?

14 A. Well, the reasons were several. No. 1, everyone on the
15 Security staff was at all times supposed to be acquainted with
16 what was going on in the world of the organization, to be
17 abreast of these source reports and so forth. So one way we did
18 that was by keeping all these entries in our notebooks.

19 Secondly, now and again we would be assigned to brief
20 individuals on the contents of some of these. And then, of
21 course, we would be responsible occasionally to write articles
22 and press releases and so forth on the basis of these entries,
23 so that we also had a motivation for maintaining notebooks and
24 keeping information in our notebooks.

25 Q. Let me show you, sir, what I have marked for

1 identification --

2 MR. MARKHAM: I have shown these to Mr. Walker, your
3 Honor.

4 Q. -- as Government's 65, 66 and 67 for identification.

5 Putting these three documents in front of you, do you
6 recognize any of those Government's exhibits for identification?

7 A. Yes, I do.

8 Q. What are they?

9 A. These are xeroxes of three notebooks that I maintained while
10 I was on the Security staff.

11 Q. All right. Now, approximately how many notebooks did you
12 maintain for your entire time on the Security staff?

13 A. I'm not certain. I'd have to guess. Perhaps twenty
14 notebooks or so.

15 Q. And you recognize each of these three as notebooks written
16 in your hand while you were on the Security staff?

17 A. That's right.

18 MR. MARKHAM: Your Honor, I'd like to introduce these
19 at this time. May they be marked as Government's 1, 2 and 3 in
20 evidence?

21 MR. WALKER: I object, your Honor, and I'd like to be
22 heard on this.

23 THE COURT: All right.

24 MR. MARKHAM: Well, that's all right. For now I'll
25 mark them by way of identification. I'll come back to them.

1 THE COURT: All right. Now, Mr. Markham, we need to
2 have a little consultation about the numbering system. I do not
3 want two documents in this trial with the same number even
4 though one is in evidence and one is for ID.

5 MR. MARKHAM: Yes, your Honor.

6 THE COURT: We will not use but one number sequence,
7 and that is for -- one number sequence. Now, I have no problem
8 with your marking for ID; and if it doesn't come into evidence,
9 we simply have a gap in the numbers. But I do not want two
10 number sequences. That is a recipe for confusion.

11 MR. MARKHAM: Then if these were to come in, then I
12 would mark them by the same numbers they have been identified
13 by.

14 THE COURT: All right.

15 MR. MARKHAM: All right. But I'm not going to do it --

16 THE COURT: I take it you have already marked some item
17 as one, two and three, haven't you?

18 MR. MARKHAM: One, two and three for identification,
19 yes, your Honor.

20 THE COURT: Well, all right. Now, I think we had
21 better just use the same number sequence both for ID's and in
22 evidence.

23 MR. MARKHAM: Yes, your Honor.

24 THE COURT: And so you marked these as 65, 66 and 67
25 for identification.

1 MR. MARKHAM: I won't offer them at this time.

2 THE COURT: All right.

3 BY MR. MARKHAM:

4 Q. Now, you mentioned that the organization had sources or
5 consultants, correct?

6 A. Yes.

7 Q. And you mentioned that some of those were paid?

8 A. That's correct.

9 Q. How frequently did you observe Jeffrey Steinberg to be
10 speaking to these paid consultants or sources?

11 A. Well, on a daily basis.

12 Q. And how about Paul and Michele and Robert?

13 A. Well, I think most commonly one of those persons would be in
14 contact with certain of the key consultants and sources over a
15 determinate period of time. But as long as -- whenever they
16 were in the office, I think it's the case that -- when they were
17 in the office, they were being contacted, one or another of the
18 sources or consultants.

19 Q. Now, have you ever met a man by the name of Roy Frankhauser?

20 A. Yes.

21 Q. When did you first meet him?

22 A. I met Mr. Frankhauser in 1975.

23 Q. Where?

24 A. In Reading, Pennsylvania.

25 Q. And after you met him in 1975 in Reading, Pennsylvania, how

1 often was it that you saw him?

2 A. Inclusive down to --

3 Q. Yes, up until you left the organization.

4 A. Thirty times --

5 Q. Do you --

6 A. -- perhaps.

7 Q. Do you see that Mr. Roy Frankhauser here in the courtroom

8 today?

9 A. Yes, I do.

10 Q. Would you point him out, for the record?

11 A. He is the gentleman there at that table (indicating).

12 Q. All right. Well, there are two tables and three gentlemen.

13 Can you be more specific?

14 MR. WALKER: I agree that he has identified

15 Mr. Frankhauser, your Honor.

16 THE COURT: All right.

17 Q. Was there ever a time that Mr. Frankhauser worked --

18 MR. WALKER: Objection, your Honor. It sounds -- it's

19 a leading question.

20 Q. All right. Where were you specifically the first time you

21 met Mr. Frankhauser?

22 A. I was on The Mall in Reading, Pennsylvania, a public

23 shopping area sort of in the center of town.

24 Q. Did you speak to Mr. Frankhauser on that occasion?

25 A. Briefly, yes.

1 Q. And did you approach him or did he approach you?

2 A. He approached me and the persons with whom I was standing.

3 Q. And do you recall what he said?

4 MR. WALKER: Objection, your Honor. May we approach
5 the bench?

6 THE COURT: All right.

7 (SIDE BAR CONFERENCE....

8 MR. WALKER: I have a feeling we may be getting -- I
9 don't know what the testimony is, but other bad acts of
10 Mr. Frankhauser that the Government has never told me about, so
11 I'd like to --

12 MR. MARKHAM: I anticipate the answer to be that
13 Mr. Frankhauser said he wanted to work with the group. That was
14 his initial contact with the group. I have instructed my
15 witness to avoid the part of the answer which would indicate
16 that Mr. Frankhauser was making the approach as a member of the
17 Klan, so in a sense the answer is only a partial truth. But I
18 believe the answer to be -- and I have worked carefully with the
19 witness on this. The answer would be that Mr. Frankhauser
20 approached and indicated that he wanted to work with the group.

21 MR. WALKER: And that's basically the extent of the
22 conversation?

23 MR. MARKHAM: Well, then he says something about his
24 intelligence function or lack thereof, and it goes on from
25 there.

1 MR. WALKER: Sure. Okay.

2 MR. MARKHAM: Perhaps it would be appropriate, your
3 Honor, since the witness has been on the stand for the morning,
4 for us to take a very short break and call the witness over just
5 to make sure that now with you up there and Mr. Markham over
6 here, since we have had this objection, he knows that he is to
7 avoid any part of the answer --

8 MR. WALKER: Maybe it could be by leading question,
9 your Honor. In other words, did he --

10 THE COURT: I think the best way is for me simply to
11 ask the witness to step over here now for me to give him an
12 instruction.

13 All right. Will the witness please step over here for
14 a moment.

15 MR. WALKER: I won't object to Mr. Markham leading him
16 through this testimony.

17 MR. MARKHAM: I'd like to --

18 (Counsel conferring)

19 (The witness came to the side bar conference.)

20 THE COURT: Mr. Markham has advised me that he has
21 talked with you to instruct you not to make any references in
22 your answering questions here about anything Mr. Frankhauser may
23 have said regarding his connection with the Klan at any time.

24 THE WITNESS: Yes, sir.

25 THE COURT: And so you will understand that neither

1 attorney means to ask you a question that would call for that
2 information, and you are not to say anything about that in any
3 of your answers.

4 THE WITNESS: Yes, sir. Thank you for reminding me.

5 MR. MARKHAM: We also covered other hate groups.

6 THE COURT: Yes. Yes. The same instruction applies.

7 THE WITNESS: Yes.

8 MR. WALKER: Incidentally, your Honor, in the absence
9 of the witness just one other point.

10 THE COURT: You may step back.

11 (The witness resumed to the stand.)

12 MR. WALKER: There was all kinds of news reports last
13 night and this morning. Some I heard -- most of the reports had
14 nothing about the Klan membership. But I would ask the Court at
15 some point during the day to indicate there were news reports,
16 ask if anyone has read them. I think I heard about one thing
17 mentioning the Klan either on TV or somewhere. I'm sorry I'm so
18 vague about it --

19 THE COURT: Well, all right. Just before we break I
20 will make an inquiry.

21 MR. MARKHAM: When will we be breaking, your Honor?

22 THE COURT: In another 15 minutes or so.

23END SIDE BAR CONFERENCE)

24 BY MR. MARKHAM:

25 Q. What was it that Mr. Frankhauser said to you when he

1 approached you in Reading back in 1975?

2 A. He said that he was not affiliated with either the FBI or
3 the CIA and that he was interested in working with us.

4 Q. Okay. And when you were there, were you there with other
5 Labor Committee members?

6 A. Yes.

7 Q. Now, did you say anything back to him?

8 A. If I said anything, I simply exchanged a pleasantry. "Oh."

9 Q. All right.

10 A. Okay.

11 Q. Now, did he say anything else that you can recall during
12 that conversation?

13 A. Well, he continued a bit along the same lines saying that he
14 had some agreements and some disagreements about certain things
15 but that he felt that he could work with us in some way.

16 Q. Agreements and disagreements with whom?

17 A. With the Labor Committee, with the organization of which I
18 was then a member.

19 Q. Did any other Labor Committee member say anything to him
20 after he said what you have indicated?

21 A. My recollection is that they also were pretty bland in their
22 responses. "Oh, it's interesting to hear that you're saying
23 that." You know, "Well, thanks for telling us." You know,
24 "Well, we'll have to talk about this sometime," that kind of
25 response.

1 Q. After that conversation, did you relay the substance of that
2 conversation to anyone?

3 A. No, I did not.

4 Q. Do you know if anybody else did?

5 A. Yes.

6 Q. Who did?

7 A. I believe the person who -- well, I know the conversation
8 was relayed because I later heard back about it. But the person
9 who was responsible for those kind of contacts with the
10 organization center was a person named Michael Brennen.

11 Q. Do you know if subsequent to that time Defendant Frankhauser
12 started to work with the Labor Committees?

13 A. Yes, he did.

14 Q. Do you know when he started to work with the Labor
15 Committees?

16 A. Well, he began to have meetings with members of the Labor
17 Committee about two or three weeks following this conversation,
18 so I would say in the late summer of 1975.

19 Q. Incidentally, what were you doing in Reading in 1975? Were
20 you a Labor Committee member at that time?

21 A. Yes, I was.

22 Q. What were you doing there?

23 A. Well, I was a field organizer at that time. I was one of
24 the persons who would sell the newspaper or pass out leaflets
25 and things of that nature. And at that point the organization

1 saw itself as on a sort of massive expansion drive so that it
2 established a plethora of regional centers, each of which had
3 satellites. Just in that particular case Philadelphia was the
4 regional center; Reading was one of five or six smaller towns in
5 the Pennsylvania area which was under the aegis of the
6 Philadelphia organization. And I was sent from Philadelphia to
7 Reading to organize in this way.

8 Q. How long did you stay in Reading to organize?

9 A. Three or four months, I believe.

10 Q. When during this three- or four-month period was it that you
11 had the additional encounter with Defendant Frankhauser?

12 A. I'm afraid that I don't remember the exact date. I do
13 recall that it was in the middle or late summer of 1975.

14 MR. WALKER: If your Honor please, could Mr. Markham
15 refer to Mr. Frankhauser as "Mr." rather than "Defendant" or
16 just plain "Frankhauser"?

17 MR. MARKHAM: I'll say "Mr." if you wish.

18 THE COURT: All right.

19 BY MR. MARKHAM:

20 Q. When was the next time that you personally observed
21 Mr. Frankhauser after this occasion?

22 A. Well, I observed him maybe half a dozen other times in
23 Reading having meetings with other members of the organization;
24 specifically, members sent from the Philadelphia regional
25 headquarters. So I observed about half a dozen such contacts

1 throughout the rest of the time that I was in Reading. And then
2 later in the fall or winter of 1975 he also came to my -- as I
3 recall, on one occasion to the Philadelphia office.

4 Q. Now, during these conversations -- well, during these
5 meetings that you observed in Reading that took place after the
6 first meeting with Mr. Frankhauser --

7 A. Yes.

8 Q. -- did he say anything that you overheard?

9 A. In his conversations with me personally he tended to
10 exchange pleasantries.

11 Q. Did you ever overhear any of his conversations with others
12 that took place in Reading?

13 A. Well, it all took place in whispers. There was a great deal
14 of secrecy about them. The substance of them was communicated
15 to me, but I was not present for them, the conversations in
16 Reading, themselves.

17 Q. All right. Who communicated the substance of those
18 conversations to you?

19 A. A number of persons. The first was a person named Steven
20 Douglas.

21 Q. All right. Who else?

22 A. Subsequently details of those conversations a number of
23 years later were communicated to me by various persons on the
24 Security staff.

25 Q. All right. Did Steve Douglas ever express a belief to you

1 as to who Mr. Frankhauser was?

2 MR. WALKER: Objection. I think I have to object to
3 that, your Honor.

4 THE COURT: Sustained.

5 Q. Did you ever discuss with Mr. Douglas who or -- did you --
6 well, let me go forward in time.

7 After you left Reading, did you ever have any
8 conversations directly with Mr. Frankhauser?

9 A. Yes.

10 Q. How often?

11 A. Well, I'd have to put this in two phases, if I may.
12 Initially while I was still in Philadelphia, I saw
13 Mr. Frankhauser perhaps once or twice; and on those occasions we
14 exchanged, you know, "Hello. How are you?"

15 Subsequently when I joined the Security staff in 1981,
16 from the period beginning in 1981 to my leaving the organization
17 I saw Mr. Frankhauser scores of times. I'd have to say 40 times
18 or so, I think. And since I left the organization I have been
19 contacted by Mr. Frankhauser twice by telephone.

20 Q. All right.

21 A. So that's my association with Mr. Frankhauser.

22 Q. Do you know whether Mr. Frankhauser ever commenced working
23 with the organization?

24 A. Yes.

25 Q. How do you know that?

1 A. Well, several ways, for several reasons. No. 1, the
2 organization sent money on a weekly basis to Mr. Frankhauser as
3 his retainer as a consultant.

4 Q. Well, how do you know that that occurred?

5 A. Well, because, among other things, I did that. I was one of
6 the persons who had the responsibility from time to time of
7 getting the money from the finance office, going to the post
8 office, buying a postal money order, putting it in the envelope
9 and sending it to Roy Frankhauser.

10 Q. And do you know how long Mr. Frankhauser was on the payroll?

11 A. Well, I don't know when it began. I certainly recall that
12 by 1982 or so one of my duties was from time to time to send
13 Mr. Frankhauser his check.

14 Q. And you say that's one of your duties. Who instructed you
15 to do that?

16 A. Well, the instruction came from the Steering Committee, from
17 Jeff, Michele, Bob Greenberg, Paul Goldstein, depending upon who
18 was in -- who was running the show on a given day.

19 Q. Do you recall how much money Mr. Frankhauser was paid on
20 each of these payments that you made to him?

21 A. During the last period of time --

22 Q. Now, what period is "the last period of time"?

23 A. In 1984 -- I say that because at a certain point he received
24 a raise. I remember that before he got less money, and then in
25 1984 or thereabouts he began getting \$500 weekly. I don't

1 remember what the previous amount of money was, but the final
2 amount was \$500.

3 Q. \$500 --

4 A. The highest amount that I ever sent him on a weekly basis
5 was \$500.

6 Q. Do you remember sending him \$500 on a weekly basis for a
7 short period of time towards the end or for how long?

8 A. This was ongoing. I would have to say -- and I'm not -- I
9 just don't remember when the \$500 started, but I was sending him
10 checks for at least a year and a half, two years.

11 Q. All right. And what form did those checks take that you
12 sent him?

13 A. They were postal money orders.

14 Q. How would you arrange to get those postal money orders to
15 send them to Mr. Frankhauser?

16 A. Well, the procedure would be that I would be told or whoever
17 was the Officer of the Day -- I have mentioned that category
18 before -- would be told to go to the finance office, get the
19 requisite amount of money, take the money to the post office,
20 buy the postal money order and send it to Mr. Frankhauser.

21 Q. And what service did Mr. Frankhauser perform for this money?

22 A. His services were two-fold. First, he provided ongoing
23 information to the organization concerning really all manner of
24 subjects, strategic affairs, espionage activities, operations
25 against the organization, which information he represented to

1 the organization as coming, you know, variously from his own
2 investigations or from intelligence community sources who were
3 using him as a conduit for information to the organization.

4 Q. You heard Mr. Frankhauser say that?

5 A. Yes.

6 Q. I --

7 A. Well, let me clarify. I heard the reports say -- maybe I
8 should let you ask the question here, but I heard the reports
9 that came from Mr. Frankhauser which characterized the
10 information as emanating from the intelligence community or
11 specific intelligence agencies.

12 Q. And how often did you hear that type of report?

13 A. We got such reports almost daily.

14 Q. And did you ever observe Mr. Frankhauser face to face make
15 such reports to members of the Security staff?

16 A. Most commonly not. I did observe, you know, from time to
17 time a portion of such a discussion or something that would come
18 up in other conversations. I usually wouldn't be the primary
19 person to receive the reports. Maybe I'm making too fine a
20 distinction.

21 The answer is yes, I heard portions of such reports,
22 but he wouldn't come to me and tell me from top to finish his
23 report for the day. He would go to someone else.

24 Q. Who did he go to, to give these reports?

25 A. He would go to a member of the Steering Committee. I have

1 named those persons. It would either be Paul Goldstein, Jeff or
2 Michele Steinberg or Bob Greenberg. They would be the person
3 who received the reports or would be in contact with
4 Mr. Frankhauser on a daily basis.

5 Q. When Jeff Steinberg received a report from Mr. Frankhauser
6 -- well, did you observe him doing this personally face to face
7 at any time?

8 A. Yes.

9 Q. Did you observe him doing this any other way?

10 A. Also by telephone.

11 Q. Did he do it more or less frequently by phone than in
12 person?

13 A. More frequently by phone. Mr. Frankhauser's base of
14 operations was Reading. The national office where the member of
15 the Security staff Steering Committee would be located would be
16 in New York. So usually they talked by phone unless
17 Mr. LaRouche were on tour somewhere, in which case very commonly
18 Mr. Frankhauser would have as one of his assignments to come and
19 participate in providing physical security for Mr. LaRouche
20 wherever he might be. And under those circumstances, obviously,
21 the Security staff and Mr. Frankhauser would be in the same
22 place and the information would be communicated, you know,
23 directly.

24 Q. When you were Officer of the Day, what were your functions?

25 A. Well, the other functions included preparing a press

1 summary; you know, handling the logistical details such as, you
 2 know, getting money for any purpose, including this purpose that
 3 I mentioned, sending money to Mr. Frankhauser; and also,
 4 answering the telephone, taking all incoming calls and
 5 channeling them to the person who was to receive them.

6 Q. Did you ever receive any incoming calls from
 7 Mr. Frankhauser?

8 A. Yes.

9 Q. How frequently?

10 A. Very frequently. Almost any time that I was Officer of the
 11 Day.

12 Q. When Mr. Frankhauser would call in, who would he ask for?

13 A. He would ask usually to speak to Mr. Green.

14 Q. Did you have a Mr. Green on your staff?

15 A. No one whose real name was Mr. Green, no.

16 Q. Did you ever hear anybody identify who Mr. Green was?

17 A. Oh, yes.

18 Q. Who?

19 A. Mr. Green was Jeffrey Steinberg.

20 Q. Did you ever have any discussion with Mr. Frankhauser as to
 21 why he was calling in and asking for Mr. Green rather than
 22 Mr. Steinberg?

23 A. Well, no. I didn't need to discuss the matter with
 24 Mr. Frankhauser. I knew what the reason was.

25 Q. All right. How many times do you recall Mr. Frankhauser

1 calling in and asking for Mr. Green?

2 A. This is one of those things that has to be in the order of a
3 hundred times or more.

4 Q. And was there something that you did when you got a call
5 from somebody whose voice you recognized as Frankhauser asking
6 for Mr. Green?

7 A. Yes. He would also identify himself by a specific name so I
8 would also know who he was when he called in. What I would say
9 is -- what any Officer of the Day would say is, "Mr. Green or
10 Dr. Green," sometimes we called him, "Dr. Green is not available
11 at the moment. Is there a number where Dr. Green or Mr. Green
12 can contact Mr. Clay?" which was our name for Mr. Frankhauser in
13 this procedure. And then the number would be given. We would
14 write it down. We thanked the operator very much. We would go
15 to Jeffrey Steinberg or whoever the member of the Steering
16 Committee on duty was, give him the number and say, "Roy called.
17 He's at a phone booth. He wants a call back."

18 Q. And did you ever observe what Mr. Steinberg did after you
19 gave him this message?

20 A. Yes. He or --

21 Q. How many times did you observe?

22 A. Well, again, this is -- this is something which took place
23 virtually on a daily basis. The procedure was always the same.
24 One or another member of the Steering Committee would pick up a
25 notebook, go out the door and proceed to call Mr. Frankhauser.