IN THE UNITED STATES DISTRICT COURT FOR THE

SEP = 61983

DISTRICT OF COLUMBIA

THE SYNANON CHURCH,

Plaintiff

CIVIL NO. 82-2303

Farmsworth declara

SEP 1983

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UNITED STATES OF AMERICA,

Defendant

NOTICE OF FILING DECLARATION IN SUPPORT OF MOTION OF THE UNITED STATES FOR AN ORDER REQUIRING SYNANON TO IMMEDIATELY PRODUCE ALL INFORMATION CONCERNING DESTROYED AND HIDDEN SUBPOENAED MATERIALS DETAILING SYNANON'S ILLEGAL ACTS, OR, IN THE ALTERNATIVE FOR AN ORDER DISMISSING THE COMPLAINT ON THE MERITS

The United States herewith files the Declaration of George Farnsworth in support of its motion for an order requiring Synanon to immediately produce all information concerning destroyed and hidden subpoenaed materials detailing Synanon's illegal acts, or, in the alternative, for an order dismissing the complaint on the merits.

Respectfully submitted,

THOMAS M LAWLER

FRANCIS G. HERTZ

Attorneys, Tax Division U. S. Department of Justice Washington, D.C. 20530 Telephone: (202) 724-6435 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

THE SYNANON CHURCH,

Plaintiff

v.

CIVIL ACTION NO. 82-2303

UNITED STATES OF AMERICA,

Defendant

COURT FOR THE

DECLARATION OF GEORGE FARNSWORTH

- 1. I am a former resident of Synanon and am currently employed as the Director of Administrative Systems for the United States Department of Housing and Urban Development in Washington, D.C.
- 2. In 1976 I entered Synanon's Santa Monica, California facility as a square or lifestyler with my family. In early 1977 I became manager of Synanon's data processing facilities. I left Synanon in September of 1980.
- 3. In March of 1979 I was recruited by Synanon Archivist Steve Simon to work on a secret project for the Synanon legal department destroying and altering information in Synanon's computer indices of the tape-recordings located in the Synanon Archives. I also have knowledge of the destruction of Synanon tape-recordings.

A. DEDERICH'S THINK TABLE

4. The Think Table Topic Summaries contained in Government Exhibit Volume II are true and accurate summaries of Charles E.

derich's (Dederich's), the founder and head of Synanon, pronouncements at the Think Table. Special care was taken to make
these summaries as accurate as possible. The purpose of the
summaries was to disseminate Dederich's thoughts throughout
Synanon and to educate the population on Dederich's thinking.
After the December, 1978, arrest of Dederich, Synanon attorney
Phillip Bourdette got on the Synanon "wire," an internal radio
and communication system, and ordered that all Synanon tape
recordings in the possession of Synanon residents be turned over
to the legal department and that all Think Table Topic Summaries
be turned into the legal department. Pursuant to these orders,
Dorothy Garrett and I delivered to Phillip Bourdette our Think
Table Topic Summaries.

B. DEDERICH'S NEW RELIGIOUS POSTURE SPEECH

- 5. Dederich delivered his New Religious Posture speech at a Think Table on September 5, 1977. It was thereafter repeatedly broadcast over the Synanon "wire." I heard some of these rebroadcasts. Tape-recorded copies of the speech were also available throughout the Foundation for a period of time. The militant posture described by Dederich in this speech was Synanon's policy. Dederich took this policy seriously.
- 6. Synanon purchased assault weapons and members of Synanon's Board of Directors and other Synanon members wore guns as part of Synanon's posture of "don't mess with Synanon."

- 7. In June of 1978, Dederich and a large number of Synanon members fled to Formia, Italy. Those who initially left the United States with Dederich included the following persons:
 - (a) Dederich's wife, Ginny Dederich;
 - (b) Dederich's daughter, Jady Dederich and her husband, Larry Akey;
 - (c) Dederich's son Dede and his wife, Maggie;
 - (d) Synanon Director Ron Cook and his wife, Pam;
 - (e) Synanon Attorney Howard Garfield and his wife, Liza;
 - (f) Dederich's servant, Matt Rand; Matt's
 wife, Michelle, and
 - (g) Harvey Hecht and his wife.
- 8. In July, 1978, Dederich ordered an extended Board Meeting in Formia, Italy. Pursuant to these orders a second group of people traveled to Formia, Italy. These persons included myself and Dorothy Garrett, as well as Synanon President Ed Siegel and his wife Rona and Synanon Chief Counsel Dan Garrett and his wife, Sylvia Garrett. This second group arrived in Italy on or about July 9, 1978.
- 9. In Formia, violence and Synanon's "enemies" were discussed in nearly every game, dinner and Board Meeting.
- 10. There were extensive discussions of Synanon's "enemies" and who Synanon would attack or "hit." These discussions included discussion of breaking Attorney Paul Morantz's knees and Phil Ritter's knees and attacking other Synanon "enemies." These

scussions also included talk of attacking former Synanon residents Bill Crawford, Bobby Kohl and Jack Tolchin.

- 11. Dederich and Synanon's Chief Counsel, Dan Garrett, led these discussions on violence.
- 12. Representative of the discussions concerning how Synanon might attack Attorney Morantz are the following:
 - (a) Morantz could be kidnapped and tortured;
 - (b) Relatives of Morantz could be beaten up;
 - (c) Morantz could be kidnapped and his ear cut off or his arms cut off.

Other forms of torturing or harming Morantz were also discussed.

Dederich stated that Morantz deserved to be attacked because he opposed Synanon.

- 13. During these discussions Dederich or Garrett stated that Synanon knew people who would kill Morantz for money. It was stated that Synanon attorney Red Williams might know such a hitman who would kill Morantz for money. Dederich and Garrett seemed to agree that Synanon would hire a hitman to kill attorney Morantz. Later, I heard Garrett telling Dederich that he had made a call from Formia to Synanon attorney Red Williams, who was in the United States, to inquire about a hitman to kill Morantz.
- 14. Some of the above-described games and meetings in Formia, Italy, were tape-recorded by Synanon.
- D. THE OCTOBER 11, 1978 ATTACK ON ATTORNEY MORANTZ
- 15. I was in the Wings Motor Hotel in Lake Havasu, Arizona, which was owned by Home Place, Inc., at the time of the October 11, 1978 rattlesnake attack on attorney Paul Morantz. News of the

The news was greeted with cheers by many persons in the room with me. Morantz was at this time viewed as the number one enemy of Synanon.

- E. DAN GARRETT AND DAN SORKIN FLY OUT OF LAKE HAVASU
- 16. On October 14 or 15, 1978, Synanon Chief Counsel Dan Garrett and Dan Sorkin flew out of Lake Havasu, Arizona.
- F. DAN SORKIN FLIES TAPES INTO LAKE HAVASU, ARIZONA
- 17. In November, 1978, after the Los Angeles Police
 Department's raid of the Home Place, Dan Sorkin flew tape recordings from the Synanon Home Place in Badger, California to Lake
 Havasu, Arizona. Synanon rented a basement warehouse in Lake
 Havasu, Arizona, to store its tape recordings. I saw a large
 number of tapes in that basement warehouse. Also, after the
 November 21, 1978 raid, Steve Simon began a review of Synanon
 tape-recordings and logs of tape recordings.
- G. DAVID BINNS BURNS TAPE RECORDINGS FLOWN INTO LAKE HAVASU BY DAN SORKIN
- 18. After I saw the tape recordings in the basement warehouse in Lake Havasu, Arizona, Synanon resident accountant David Binns told me that Dan Sorkin had flown tapes down from the Home Place in California to be destroyed. David Binns told me that he had been instructed by Simon to burn some of the tapes in Lake Havasu City with gasoline. He told me he had done this and that it was a very messy job.

A. SYNANON'S POLICY OF TAPE RECORDING CHARLES DEDERICH

19. While I was in Synanon it was Synanon policy to tape record virtually everything said by Dederich. All tape recordings of Dederich were required to be made on new, high quality tapes.

No original tape recording of Dederich were ever thrown away or "recyled." This was especially true of Dederich's Think Table and Morning Court. People were yelled at if they used old tapes to record Dederich's words. Synanon wire technicians were always trying to get perfect tapes of Dederich.

I. SYNANON'S COMPUTER INDICES OF TAPE-RECORDINGS

- 20. As Synanon's data processing manager, I was placed in charge of a computer system to index Synanon's tape archives. I developed with Synanon resident Sybil Schiff a second computer system to index and organize Synanon's tape transcripts. These computer systems were approved by Synanon Archivist, Steve Simon.
- 21. Virtually every one of Synanon's tape recordings was placed on the computer system. This program was designed to list the tape recordings in at least two different ways. First, all tapes could be identified and listed by title. Secondly, all tapes could be identified and listed by date. Through the use of key words, all transcripts with specified key topics could be identified and listed by subject matter, as well by title and/or date.

- 23. The date printout listed all tapes in chronological order. Each tape was given a reference number by date with a suffix to distinguish the tape if more than one tape was made on that date.
- 24. The subject matter printout of transcripts could identify all tape transcripts in the Synanon archives on any particular subject for which there was a key word(s).
- 25. Sybil Schiff was responsible for preparing subject matter lists of the contents of Synanon tape transcripts for data processing. These subject matter lists were tied into key words such as, among others, the following key words:
 - (a) violence
 - (b) enemies
 - (c) Morantz
 - (d) Holy War
 - (e) guns
 - (f) sex
 - (g) Time, Inc.
 - (h) KGO
 - (i) media

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- 26. Sybil Schiff was responsible for the preparation and indexing of transcripts of the Synanon tape recordings. Every tape with subject matter lists on the computer had parallel transcripts. This was true for virtually all of Dederich's Think Tables or Morning Court.
- 27. Detailed subject matter indexes of all of Dederich's Think Tables or Morning Court tape transcripts were prepared by Sybil Schiff for data processing and placed in the Synanon computer's data base.
- J. THE SYNANON LEGAL DEPARTMENT'S SECRET PROJECT TO PURGE THE SYNANON COMPUTER'S INCRIMINATING EVIDENCE
- 28. On March 7, 1979, I was approached by Steve Simon and Sybil Schiff. Simon told me that the computer subject matter indices of Synanon tape recordings were very dangerous. He told me that, if the index had to be produced to attorney Morantz, that Morantz would ask for the underlying tapes and listen to these tapes. Simon was also concerned that these indices would be made available to investigators in the prosecution of Dederich for the attack on attorney Morantz. Simon told me that if Morantz or others obtained the indices they would be able to locate and listen to the underlying tapes. To prevent this from happening, Simon told me the computer indices of the tape recordings would have to be "cleaned up" and purged of all "dangerous" references. Simon told me at this time that this project of deleting the tape indices from the Synanon computer had been discussed with the legal department and that the project was being done with the approval of and on behalf of the legal department.

- 29. On or about March 7, 1979, Simon also told me that he required a complete printout of the computer indices by title, date and subject matter. Simon told me that there was urgency involved and that he required the printout quickly because of a discovery matter. He also told me to keep the existence of the project secret.
- 30. After my March 7, 1979 meeting with Simon, I told
 Dorothy Garrett that I was working on a "hush, hush" project for
 Simon. She replied by informing me that she knew of the secret
 project and had earlier discussed it with Simon.
- 31. From midnight to 5:00 A.M. on March 11, 1979, and during the evening of March 12, 1979, I retrieved from Synanon's computer the information requested by Simon. The computer printouts of Synanon's tape archives that I prepared for Simon were eight inches or more thick. These I delivered to Sybil Schiff for delivery to Simon because Simon did not want to use the internal Synanon mail system for this purpose. Later, Steve Simon acknowledged to me that he had received the printouts from Sybil Schiff.
- 32. On March 29, 1979, I had an early morning meeting with Sybil Schiff and Steve Simon at Synanon's Tomales Bay facility in Northern California. Steve Simon had come to Tomales Bay from the Home Place in central California specifically for this meeting. Simon informed me that he wanted to now delete material from the computer index of Synanon tape recordings that had been delivered to him by Sybil Schiff. Simon wanted to mark-up the

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Louts and have me make the corresponding changes and deletions in the computer indices of the tape-recordings. I advised Simon that this would not be practical since it would be too hard to key punch and that he would have to separately list what he wanted deleted and changed. Within 24 hours of this meeting, Steve Simon delivered to me a list of key words he wanted deleted from the key word subject list. These key words included, among others, "violence," "Morantz," "Holy War," "KGO," and "Time." Simon reiterated to me at this time that I was not to talk to anyone about what I was doing. He also told me not to use regular key punch operators and instructed me to work at night so that no one would know of the existence of the deletion project. Both I and Sybil Schiff told Simon we were concerned with the legality of what we were doing. Simon advised us that what we were doing was legal.

- 33. On Friday evening, March 30, 1979, I worked with Sybil Schiff key punching the materials Simon wanted deleted and changed in the key word subject matter index of Synanon's tape transcripts. At this time Sybil Schiff expressed great regret about the index deletions because she had worked so hard on the indexing.
- 34. During the nights of March 31, 1979 and April 1, 1979,

 I worked deleting from the Synanon computer inventory of its

 transcripts and tape-recordings the information Simon had requested
 that I delete.

- 35. On April 2, 1979, I met with Sybil Schiff and Steve Simon and delivered to them one copy each of the results of the runs of March 31 and April 1, 1979. These results included a copy of the indices of tape-recordings as amended after the deletions were made as well as an automatically generated list of all the deletions made.
- 36. After the delivery of these results to Schiff and Simon, it was Schiff's job to compare the amended printouts I had delivered to Simon and Schiff on April 2, 1979 against the key word deletion list earlier provided to me by Simon on March 29 or March 30, 1979. Errors in the runs of March 31 and April 1, 1979 were found by Schiff, and on April 8, 1979, I made corrective runs. Again, I delivered to both Simon and Schiff a copy of the index as again amended and a list of the additional deletions made. This was identical to the procedure which I subsequently used during the tape recording deletion project, that is, I always delivered to both Simon and Schiff a copy of the printout as amended and a copy of the deletions made.
- 37. After the corrective run of April 8, 1979, I spoke with Steve Simon on the morning of April 11, 1979. We discussed Simon's options with respect to future corrections of the computer program of Synanon's tape recordings. Simon had not yet decided what to do with certain problems still remaining in the index. For example, since key subject words had now been deleted, under the tape title printout there would be a blank under the subjects discussed. With respect to this problem I

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posed to Simon that we could (1) substitute innocuous subjects; (2) erase all references to the tape entirely; or (3) change the format of the tape title index format. No decision was made by Simon at this time. Later, he exercised both options one and two. The computer tape index which the United States Department of Justice has informed me was presented by Simon as exhibit one to his testimony of November 5-6, 1981, before Judge Fauntleroy of the Superior Court for the District of Columbia in Synanon v. Bernstein, et al., C.A. No. 71-89-78 is attached hereto as exhibit one. That index is a doctored index of Synanon tapes in which the format of the printout as changed by me and from which entire tapes have been deleted, all at Simon's direction. These printouts intentionally contain as little information as possible. The computer printouts attached hereto as Exhibits 2 and 3 are also doctored indices.

38. During the course of purging the "dangerous" key words from the computer index of tape recordings, I had a conversation on the secret Simon project with Synanon attorney Phillip Bourdette at Mr. Bourdette's office at the Bay Inn in Tomales Bay, California. This conversation occurred in April, 1979. At that meeting I told Bourdette exactly what I was doing for Simon and asked Bourdette if he, Bourdette, was aware of the project. Bourdette answered me by saying that he, Bourdette, had earlier discussed the project with Simon and that Simon was not acting on his own. Bourdette informed me that the reason for the secret Simon project was to make it more difficult for litigants and

stigators to locate harmful (to Synanon) language and tapes.

1 asked Bourdette whether what I was doing was against the law.

Bourdette replied that the indices of Synanon's tape recordings had not yet been requested in discovery and that what Synanon was doing was not against the law until the tape indices had been requested by a litigant.

39. During my meetings with Simon and Schiff on March 29 and March 30, 1979, the three of us visited the Synanon wire facility which was then located at the Synanon Ranch. There, we spoke with Tom Larkin and a man named Brian. Three topics were discussed and/or acted upon at these meetings. First, Simon requested and was given the wire's computer indices to the Synanon tape-recordings. Simon stated that he was afraid the indices would be picked up at the wire by a search team or in discovery and advised that the wire would not again be provided any tape indices. Secondly, Simon had a list of tapes he wanted to remove from the wire's tape inventory room. This inventory room was approximately 20' x 20' square and was filled with hundreds of reel-to-reel and cassette tape recordings of Synanon events. Simon ordered that the bulk of the wire's tape inventory be shipped to Simon at the Home Place in Badger, California. third matter raised by Simon at these meetings concerned the wire's broadcast policy. Simon ordered that care be taken as to what was to be broadcast over the wire and that nothing on the subject of violence be broadcast. Simon instructed the wire to play old Synanon tapes from the 1960's.

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- 40. On Approximately September 2, 1979, I received a telephone call at Tomales Bay from Steve Simon who was then at the Home Place in Badger, California. Simon told me that he had more work that had to be done in purging information from the computer indices of the Synanon tape recordings.
- 41. On September 5, 1979, Simon arrived at Tomales Bay and had dinner with me and Synanon Chief Counsel, Dan Garrett. After dinner, during the night of September 5, 1979, I was joined by Simon in the data processing room and began deleting additional material. At this time a large number of entire tapes were being deleted from the computer inventory of tape-recordings. At or about this time Simon advised me that he had the actual tape recordings for which all references were being deleted from the computer and advised me that he was getting rid of the tape recordings.
- 42. On September 6, 1979, I went to bed early and woke up at approximately 3:00 A.M. on the morning of September 7, 1979. I woke up Simon and together we worked through the night in data processing deleting further information from the computer inventory of Synanon's tape recordings.
- 43. On September 5 and September 6, 1979, Simon and I deleted in their entirety from the computer inventory of tape recordings all references to the vast majority of Dederich's Think Tables and Morning Courts.

- dining room at Tomales Bay with Steve Simon, Dorothy Garrett and sybil Schiff. We talked about the secret tape deletion project. Simon advised me that he had a new list of tapes and key words he wanted to delete from the computer. After dinner Steve Simon and I went to the data processing facility. There, Simon and I created a deck of computer punch cards 5 to 6 inches thick. Using these cards we proceeded to delete from the indices, in their entirety, not only key words, but any reference to approximately 500 to 600 tape recordings. I asked Simon why these deletions had not been made earlier. Simon told me that he had just completed a big listening project and that they had problems with each of the tape-recordings that were being deleted in their entirety from the computer's inventory.
- 45. During the later part of the period in which Simon, Schiff and I were deleting information from Synanon's computer inventory of tape recordings, Sybil Schiff told me that, after verifying that I had made all the deletions requested by Simon, she had been burning the amended computer printouts and the automatically generated printouts of deletions that I had delivered to her. She also told me that she and her husband, Len Schiff, had burned a large number of tape recorded transcripts of, among others, Dederich's Think Tables. She asked me if I had burned the computer punch cards containing the deletions. After I advised her that I had not destroyed the punch cards, she told me to burn them. I thereafter burned these punch cards.

SYNANON'S LEGAL HARASSMENT

46. While a resident of Synanon I heard Synanon's lawyers talk repeatedly of using the legal process to punish people who opposed Synanon. Synanon's lawyers stated that Synanon would tie their adversaries up with endless discovery and endless depositions. I heard such talk repeatedly from Synanon attorneys Dan Garrett, Phillip Bourdette and David Benjamin. I heard Dederich state that Synanon had filed its libel suit against Time, Inc. to punish Time and to teach the media not to mess with Synanon. Dederich also stated that the libel suit would also make big money for Synanon.

L. OFF PROPERTY STORAGE FACILITIES FOR SYNANON'S TAPES

47. In October of 1979 Liz Missakian, the administrator of the Synanon Legal Department, directed me to locate professional storage facilities in California but off Synanon property where Synanon tapes could be stored under the name of an individual, rather than in the name of Synanon.

M. CHANGING PARTNERS

48. During the fall of 1977, Dederich, announced his changing partners program where he required that all married men and women immediately change partners. I participated in this program and took as my new mate Dorothy Salant Garrett, Chief Counsel Dan Garrett's wife. Dorothy Garrett was then a member of Synanon's Board of Directors. Thereafter, Dederich announced that I was to receive a \$20,000 lump sum payment. I believe this

sion was made by Dederich as a direct result of taking
Dorothy Garrett as my mate. In fact, however, I received \$10,000.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on 23,2 of August, 1983.

GEORGE FARNSWORTH

GOVERNMENT EXHIBIT

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TEW PRESCRIATION
    610701
              A DIFFEAUCTATIC HUNDER
              KHRM INTERVIEW WITH CLU
    610707
              MARRIAGE SYMMUM
   611023
   620403
              PERSONAL CLUMSELING
              INDUCTRIBATION OF C LAURICELLS
   620707
   620707
              THE COLUMNAT AFFAIR
   620805
              WHITE HOUSE CALLS
   620720
              FAREWELL TO CORDUN
   620923
              PROBLEMS, PROBLEMS
   621002
              TO-DAY HUMP
   621002
              THE WHITE HOUSE TRIP
   621006
              THE HOTHER SYNDRUME
   621010
              INDUCTRINATION
             COUNCIL SESSION-AN EXPERIMENT
   621011
   621017
             THE T.I. SYMANIST
   621017
              INDUCTRINATION
   621020
             PEDTTING THE TUNNEL BACK
   621025
             HOUSTACHE SYNTKOKE
   621031
             RE-DRGANIZATION
             SYMPUSIUM ON SYMANON
   621107
  601108
             CONFUSION
  621109
             THE BIG SCUPE
  621109
             SATURDAY "IGHT PARTY
  621110
             THE DUPDHOLICS
  671111
             GIRLS! MEFTING
             OFF TO RETO
  621114
  671121
             COURSEL AND MALYSIS
  621123
             SYMALYSIS
  671124
             BOOK TALK
  621124
             CED AND YABLL TOKY RE LSU
  621124
             CEO AND LADLUNSKY RE LST
  62112B
             COUNSELOR COLERAN
  621127
             LIDUS WITH SHRUNKEN HEADS
  621127
             SYNAHON & THE PACHE
  621200
             CED UN INCEST AND TABUUS
  621203
             THE FATHLE SYNDRUME
  621206
             GIRLS INSUCTRINATION
             EARLY SYMANON HISTORY
  621708
  621207
             GREEK CHANGES
  621216
             CED & THE CHIMINOLOGIST
             TALK WITH CED
  621223
  521225
             THE LITTLE GANGSTERS
  621226
             PREARCHIVEIST
             BUSINESS MEETING
  621228
  621229
             1762 YEARS FID
  630101
             STANDUP CLY
  630101
             CED SPEAKS BU INFATUATION
             THE TEHDER TRAP
  630101
             INDUCTRIN C LAURICELLU
  630101
  630109
             TENDER THAP
  630108
             INFATUATION.
             SQUARE INTERVIEW
  630111
             STATUS ET COUTRACTUS
  630111
             SMALL S TALK
  630112
             BACH TO BACH
  630113
           CEDI GET ACQUAINTED
  630117
  630126
             SYNATHON
  630129
            MOVIE MADMESS
  630203
             OFF TO WESTPURT
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             ACTING
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           630307
                     SASTER TAFE ASALYSIS
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           630315
                     THE LEY
                     INDUCTRIBATION OF DAMAY ELECTION
           630320
                     JAHES LANT SPEAKS DY SYNATHING
           630327
           630403
                     SYNANON-HALIBY HEARING
           630405
                     LIGHT BULES
                     THE UNRALITY TAPE
           630405
           630429
                     RAY L BARGATA
                     CHUCKS SUPPE SYNAHOUS
           630503
                     DICK AND HIS FLYING HACHI'L
           630514
           630705
                     SHEDE SYNANDNICED
                     YOUTH GROUP AT W H
           630731
                     REALITY MEETINGOUSH RESALITY
           630309
           630705
                     I'LL SET "I'LL SYNANUN
                     AF ARE PERPLE
           630714
           630718
           630725
3
                     PULITICS
                     DVER THO YEAR SYNANJI
           630925
                     I LOVE CHICK TH 25 HUROS
           631004
                     HUNTLEY COUNSEL
•
           631207
                     GO OU TO!
           631007
           631010
                     HEW POSTURES OF SYNAHON
                     REACTION TO C.E.D.
           631012
                     KENMENY TOLK
           631123
                     MEDDING OF PROPHET & PLOCE
           631125
                     SYMATHUN
           631226
           640131
                     LSD EXPENTENCE/PETTY DEDERIGH
                     HISTORY OF SE
           640101
                     CITIZENS "ESTING FOR SYMPLOS
           640101
                     DPERING AT SEMU
           640101
                     REID PAYS TRIBUTE TO CED
          :640491
                     SAT HIGHT AT DUR HOUSE
           643411
                     CED INTERVIEWS LANT SPENCER
           640411
           640419
                     THE PAROLEES PROBLEM
           640715
                     SEMIMAR TIME
                     SYMANOR CITY
           610720
                     WIZARD PREP SCHOOL
           6500000
                     WIZARD SCHOOL FEEDBACK
           650101
                     REASONS FOR STARTING HYPASS
           6:0101
                     ALCH BY34 CAL
           650201
                     WIZARD MESTING
           650220
           650302
                     OPERATION BY-PASS WIA
           650303
                     UPERATION BY-PASS #16
                     COURSEL OF THE YEAR HUND
           650303
                     UPERATION BY PASS PART U
           650308
                     UPERATION BY_PASS #2
           650311
                     MIDDLE GROUP MASLOW PAPER
           650315
                     OPERATION BY-PASS (MASLUM)
          650316
                     RAGE RATS/HAVE A CIGAR
          650318
                     WHAT A SYMPTIST IS
          650318
                     SHAT A SYPARIST IS
           650313
                     SYNATHON REGROUP
           650321
                     DPERATION BY PASS #3
           650401
                     UP B-P (DISSIPATION BRAP UP)
           650405
                     OPERATION BY-PASS #4
           650403
                     UP B_P (DISSIPATION RE-GROUP)
           650412
           650413
                     CED & BETTY/DISSIPATION GROUP
                     DHERSTION BY-PAS" ""
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SCHOOL WRAP-UP
          WIZ:
650416
          GIRLS DISSIPATION WHAP OF
650418
          GIRLS DISSIPATION REGYOUFTER
650418
          NEW EMPH ON HEALTH & BUSTIESS
650420
          DP 3-P 46 DISSIPATION
650422
          OPERATION SY-PASS #7
650429
          ABOUT TIME AND PATIENCE
650501
          UPERATION BY-PASS #3
650506
          OPERATION BY-PASS #7
650513
          DPERATION BY-PASS #10
650520
          SEAWALL DME YEAR LATER
650601
          SUEDE DISSIPATION WRAP UP
650603
          DPERATION BY-PASS 311
650610
          GREEKS DISSIPATION/-RAP-UP
650613
          EXISTENTIAL PSYCHULDGY
650617
          THE SURE THING
650621
          A LESSON IN HISTURY
650303
          SYMPOSIUM IN THE HARVARD CLUB
650808
          SYMPOSTUA IN THE HARVARD CLUB
650808
          DISSIPATION REGROUPING
650815
          LAW AND DROFK IN WATTS
650816
          THE LOUTERS
690916
          SYNAHON AND THE ESTABLISHMENT
650826
           SOMETHINGS POTTER IN CAGO
650707
          THERE'S METHAGONE IN TH. MADDIESS
650720
          SEVSC! CURTAIN RAISER
650928
          SEVSE 41 CURTAIN RAISER
650928
          SEVSC #2 AUI,LTS HAVE HURL E :
651005
          RETURN OF AND MARIE
651707
          PREP TALE / SEVSC/BY_PASS GOT
651007
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761108	CED SESSION NEW POSTURE	
761023	CED SESSIONS	
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760629	CED TALKS TO THE BLOTIMER MEN	
760827	CED/BETTY VISIT W/DIBBLES	
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760615	CHAIR GAME	
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760922	CHAIR GAME	
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760826	CHANGING FACE OF SYN	
760201	CHILDEIRTH UNMASKED: TEACHINGS	
760525	CHIPPING STEW KICK OFF	
<u>761223</u> 760611	CHRISTMAS GAME CHUCK & WARTIKES MEET	
760722	CHUCKS LUMCH	
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760601	CONSTRUCTION PLANNING MEETING	-
760817	CONVERSATION MONEY	Company of the State of the Sta

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	761217	DENVER EXPANSION MEETING
/	761110	DEVELOP DISSIPATION PLAYBACK
	760901	DEVELOPMENT NOT EDUCATION
	750528	DIETS ARE FOR EVERYONE
	760110 760830	EDUC. IN ARTS, CRAFTS AT H.P.
	761015	ELDERS GAME
	760807	ELDERS GAME SABRATH EVE
	761023	ELDERS GAME/SABBATH EVE
-	760409	EXEC COUNCIL CONF: MEDICAL
	760521	EXEC. RETREAT BUS. MTG. EXECUTIVE COUNCIL CONFERENCE
	760405 760427	EXECUTIVE COUNCIL MEETING
	760718	FAMILY GAME
	761103	FAMILY MTG RE 1 MILLION DOLLAR
	741228	FAMILY REPORT/1976PLANNING MTG
	761109	FAT A THOM MEXT STEPS
	7,0710	FINE TUNING SANTA MONICA
	761130 761013	FIRST MORNING MEAL SESSION
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•	760814	FURMING A NEW MARRAIGE CONTRAC
	740703	FORMING THE ELDERS COUNCIL
	760222	GARRETT FAMILY GAME
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	761022	HARCOURT PRACE PROJECT
	760820	HEALTH COMFERENCE
	750823	HEALTH COMFERENCE
	760426	HOBBY LOBRY: PACK TO BASICS
	760726	HOME PLACE FOOD SERVICE
	760628	HOME PLACE GENERAL MEETING
	760717	HOME PLACE MORNING MEETING
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	760106	HOME PLACE SYNANDN GAME
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          SHARING THE SETTLEMENT
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2240 24th Street, San Francisco, CA 94107 (415) 647-0440 P.O. Box 786, Marshall, CA 94940, (415) 663-8111 102 JIM TINY

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LEGAL DEPARTMENT

Dan L. Garrett, Jr. Howard M. Garfield Adrian S. Williams Philip C. Bourdette Dayid R. Benjamin Andrew J. Weill David F. Gomez RECEIVED JAN 1 1 1980

Central California Office: Synanon P.O. Box 139 Badger, CA 93603 (209) 337-2885

January 3, 1980

James Pagliuso, Esq.
Harney & Moore
Quinby Building, 12th Floor
650 South Grand Avenue
Los Angeles, California 90017

Re: Synanon v. Meriwether, Moncharsh, Morantz - Tape Indices

Dear Mr. Pagliuso:

This letter is in response to your letter of November 26, 1979 regarding the indices produced to you.

Attached you will find the combined indices which were produced to you on August 13, 1979 (covering January, 1977 through April, 1978) and on September 18, 1979 (covering 1976). After an inventory of the tapes on these indices, we discovered that some of the tapes listed could not be located. The attached list shall indicate that those titles which are crossed out are of tapes which cannot be located.

In addition, the tape listed on the 1977-1978 index as "770800 Five O'Clock Shadow Master #3" should be deleted from the index entirely. It was included by mistake and is not a Charles E. Dederich tape.

Please let me know how you wish to proceed.

Very truly yours,

Philip C. Bourdette

PCB/jse

Attachment

GOVERNMENT EXHIBIT

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	760405	A STORMY EVENING	
	761002	AED LUNCH	
	761007	AED LUNCH	
	761004	AED LUNCHEDN	
_	751018	ALCOHOLISM PUBLISH & GOV BROWN	1
	761228	AMERICAN DREAM COME TRUE	
	761210	ANTI HUSTLING MEETING	
•	761103	BD MTG RE 1 MILLION DULLARS	
	760701	BI CENTENNIAL ADDRESS	
	750729	BIO FEEDBACK GAME	
•	760531	BLAIRS GO TRAVELLING	
	760925	BOARD MEETING	
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	761226	BOARD OF DIRECTORS AGENDA MTG	
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	760201	CHILDBIRTH UNMASKED TEACHING
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	761217	DENVER EXPANSION MEETING
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	761015	ELDERS GAME
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	761023	ELDERS GAME/SABBATH EVE
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	760521	EXEC. RETREAT BUS. MTG.
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_	760427	EXECUTIVE COUNCIL MEETING
• -	750718	FAMILY GAME
	761103	FAMILY MTG RE 1 MILLION DOLLAR
_	761228	FAMILY REPORT/1976PLANNING MTG
	761109	FAT A THON NEXT STEPS
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	760726	HOME PLACE FOOD SERVICE
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	761206	PUBLIC GAME AT THE TOWN PLACE	
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780125	CONVIE CHUNG INTERVIEW II	1
770114	CONVERATION RE BETTYS HEALTH	
770522	CONVERSATION COUPLES GAME	F
771008	COUPLES GAME	
771024	DINNER GAME	F.
770701	DINGER/GAME CIRCLE	
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770316	GAME FOR BETTY	1
771101	GRAND CANYON GAME HEALTH SERVICES DISSIPATION	
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770305	HOT POTATO GAME	1 -
770207	HP STAFF GAME	
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-	770902	MURNING COURT
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	770907	MORNING COURT
i -	770908	MORNING COURT (SEE 7/8)
	770330	MORNING COURT AND LUNCH
	770427	MORNING COURT/LUNCHEON
-	770802	MORNING HEETING (SEE 7/26)
		MORNING HEETING (SEE 7/26)
2	770219	MORNING MEETING! LOTTERY
-	770117	MORNING MTG IN SANTA MONICA
•	770726	MDRNING HTG 7/26;8/2;8/16
	770903	MOTOS CYCLE GAME
-	770524	ATG RE HEALTH SERVICES & AVIAT
	770625	MTG RE RELIABLE MORTGAGE
	790109	NEW COMFIG. SYN. RELIGION
i	771231	NEW YEARS EVE GAME CIRCLE
	770617	PETER SCHRAG/HARPERIS INTERVIE
•	770514	PHOME CONVERSATION W/D FREER
	770402	PILOTS GAME
	770510	PRESS CONFERENCE AND THE PROPERTY OF THE PROPE
	771005	PRESS CONFERENCE
-	780111	PRESS CONFERENCE
•	780111	PRESS CONFERENCE
	770916	RELATIVITY INTERCHANGE
	771103	RELIABLE CONFERANCE
	770119	RELIABLE GAME
	771114	RICHIES BIRTHDAY GAME
1 1	770217	ROSIES GAME
-	770124	S M MORN MTG
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À.,	771013	SEPARATION CEREMONY
-	771017	SEPERATION CERENONY
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	770521	SOCIAL COUPLES SAME
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	771007	SOCIAL GAME
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e.	771019	ETAFE MEETING
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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a copy of the foregoing NOTICE OF FILING DECLARATION IN SUPPORT OF MOTION OF THE UNITED STATES FOR AN ORDER REQUIRING SYNANON TO IMMEDIATELY PRODUCE ALL INFORMATION CONCERNING DESTROYED AND HIDDEN SUBPOENAED MATERIALS DETAILING SYNANON'S ILLEGAL ACTS, OR, IN THE ALTERNATIVE FOR AN ORDER DISMISSING THE COMPLAINT ON THE MERITS was this 6th day of September, 1983, properly served upon the following:

SCHERR, KREBBS & GITNER Suite 610 1800 K Street, N.W. Washington, D.C. 20006

FRANCIS G. HERTZ