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IN THE UNITED STATES DISTRICT COURT FOR THE

DISTRICT OF COLUMBIA

THE SYNANON CHURCH,

Plaintiff

V.

CIVIL NO. 82-2303

UNITED STATES OF AMERICA,

Defendant

NOTICE OF FILING SUPPLEMENTAL 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 Supplemental 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

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Washington, D.C. 20530
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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

THE SYNANON CHURCH,)			
Plaintiff	ef.re.			
v	radi	CIVIL ACTI	on No.	82-2303
UNITED STATES OF AMERICA,			10 12 14	
Defendant				

DECLARATION OF GEORGE FARNSWORTH

- 1. I am a former resident of Synanon and am currently employed as the Director of the Administrative Systems Division 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 with the knowledge of the
 Synanon Law Department destroying and altering information in
 Synanon's computer indices of the tape-recordings and transcripts
 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 typical summaries of Charles E. Dederich's (Dederich's), the founder and head of Synanon, pronouncements at the Think Table. Special care was taken to make such 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."
- C. DISCUSSIONS AND PLANS OF VIOLENCE--FORMIA, ITALY--JULY, 1978
- 7. In June of 1978, Dederich and a number of Synanon members left the United States because Synanon thought Dederich would be arrested in Washington, D.C. Those who left the United States at about that time 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.
- 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 discussions 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 10, 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 10, 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.

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. To my knowledge no original tape recording of Dederich was 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 an existing computer system to inventory Synanon's tape archives. I later developed with Synanon resident Sybil Schiff a second computer system to index Synanon's tape transcripts and tapes by subject. These computer systems were approved by Synanon Archivist, Steve Simon.
- 21. Virtually every one of Synanon's tape recordings was placed on the computer inventory system. This system 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.
- 22. The title printout identified each tape or transcript by title, by type, that is, whether it was a Board Meeting, Think Table or game, would identify the date of the event, where the event took place and the number of reels of that recording.

- 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. There was also a subject matter index system. The subject matter system of transcripts and tapes could identify tape transcripts or tapes in the Synanon archives on any particular subject for which there was a key word(s). The index system was also designed to list subjects of transcripts and tapes in different ways. First, all subjects could be listed by event in order of occurrence. Second, events could be listed by subject (key word or phrase) and listed by date and occurrence. Each index reference further included a code for the speaker and index reports were produced separately for Chuck Dederich and Betty Dederich.
- 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
- 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 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 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.

cold 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 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 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

simon informed me that he wanted to now delete material from the tape inventory and from the transcript and tape index that had been delivered to him by Sybil Schiff. Simon wanted to mark-up the printouts and have me make the corresponding changes and deletions in the computer data files. 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 and a list of tape numbers to be deleted from the tape inventory. The key words included, among others, "VIOLENCE," "MORANTZ," "HOLY WAY," "KGO," and "TIME INC." 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

cripts 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 index and inventory as amended after the deletions were made as well as automatically generated lists 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 deletion lists 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 inventory and index as again amended and a list of the additional deletions made. This was identical to the procedure which I subsequently used during the 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 files 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 chronological tape printout of the index there would be a

under the subjects discussed for some events. With respect co this problem I proposed to Simon that we could (1) substitute innocuous subjects; (2) erase all references to the event entirely; or (3) change the format of the index format. No decision was made by Simon at this time. Later, he exercised primarily option two. The computer tape inventory 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 is an intentionally changed inventory 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 similarly intentionally changed. I estimate that any reference to between 50 and 100 Think Tables and/of Morning Courts were deleted from the inventory and index at this time.

38. During the course of purging the "dangerous" key words from the computer index of tape transcripts and tapes, 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

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Ler 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 investigators to locate harmful (to Synanon) language and tapes. I asked Bourdette whether what I was doing was against the law. Bourdette replied that the inventory and index 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 inventory and the index 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 inventory and index listings of Synanon tape-recordings. Simon stated that he was afraid these listings 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 listings. Secondly, Simon had a list of tapes he wanted to remove from the wire's tape inventory room. 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. The third matter raised by Simon at these meetings concerned the wire's broadcast policy. Simon ordered that care

caken 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.

- 40. On Approximately September 2, 1979, I received a telephone call at Tomales Bay from Steve Simon. 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 more tapes were deleted from the computer inventory and index. These numbered between 50 and 100 tapes. 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 and transcripts.
- 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 files.
- 43. As stated, on September 5 and September 6, 1979, Simon and I deleted tapes and transcripts in their entirety from the computer subject index and from the inventory.

- 44. On January 23, 1980, I had a working dinner at the 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 transcript index references 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 (500-600 cards). Using these cards we proceeded to delete from the index not only key words, but all references to approximately 100 more transcripts and tapes. Each event required several punch cards to delete all index references. 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 he had problems with each of the transcripts and tape-recordings that were being deleted in their entirety from the index file.
- 45. During the later part of the period in which Simon, Schiff and I were deleting information from Synanon's computer files, 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 transcripts of, among others, Dederich's Think Tables. She asked me if I had burned the computer punch cards specifying 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 at my home.

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MANON'S LEGAL HARASSMENT

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 September or 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. On October 2nd I visited and inspected one such facility and later reported addresses and rates to Ms. Missakian.

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 to 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

I was to receive a \$20,000 annual salary. I believe this decision was made by Dederich as a direct result of taking Dorothy Garrett as my mate. In fact, however, I received a \$10,000 lump sum payment.

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

Executed on 12 7 of Septend, 1983.

CEORGE FARNSWORTH



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           THE WHITE HOUSE TRIP
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           THE HOTHER SYNDRUME
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           INDUCTRIBATION
           COUNCIL SESSION-AN EXPERIMENT
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 621017
           THE T.I. SYLAMIST
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           INDUCTRINATION
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                      JAMES LANG SPEAKS OF SYNATHING
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                      SYNAHON- "ALTH" HEARTHG
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                      THE BURALITY TAPE
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                     RAY & BARGATA
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                     WIZARD PAEP SCHOUL
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                     WIZARD SCHOOL FEEDBACK
                     REASONS FOR STARTING SYPASS
          6:0101
                     HILL BY34 CAL
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                     WIZARD MESTINS
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                     OPERATION BY-PASS WIA
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                     OPERATION HY_PASS #2
          650311
                     MIDDLE GAPUP "ASLOW PAPER
          650315
                     DPERATION BY-PASS (MASLEW)
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                     RAGE RATS/HAVE A CIGAR
          650317
                     WHAT A SYMAPIST IS
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                      SHAT A SYPAULST IS
                     SYNATHON REGROUP
          650321
                     DPERATION BY_PASS #3
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           650405
                     DPERATION BY-PASS #4
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                     UP B_P (DISSIPATION RELGROUP)
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650420
          DP 3-P 46 DISSIPATION
650422
          OPERATION SY-PASS #7
650429
          ABOUT TIME AND PATIENCE
650501
          UPERATIDA BY-PASS #3
650506
          DPERATINI BY-PASS #7
650513
          DPERATION BY-PASS #10
650520
          SEAHALL DIE YEAR LATER
650601
          SUEDE DISSIPATION WRAP UP
650603
          DPERATION BY-PASS 311
650610
          GREEKS DISSIPATIUM/-RAP-UF
650613
          EXISTENTIAL PSYCHULDGY
650617
          THE SURE THING
650621
          A LESSON IN HISTURY
650303
          SYMPUSIUM IN THE HARVARD CLUB
650808
          SYMPOSTULE IN THE HARVARD CLUB
650508
           DISSIPATION REGROUPING
650815
          LAW AND URDER IN WATTS
650816
           THE LOUTERS
690916
           SYNAHON AND THE ESTABLI MELTI
650826
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730709
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730210
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730210
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730216
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730719
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730226
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730302
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730312
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730313
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730314
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730315
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730316
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730324
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730325
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730327
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730331
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730401
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 730413
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730323
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730831
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730707
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730909
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731004
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731005
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731C12
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731024
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731028
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740213
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751004 	AED LUNCHEDN ALCOHOLISK PUBLISH & GDV BROWN	
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760701	BI CENTENNIAL ADDRESS	1.
760729	BIO FEEDBACK GAME	
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751030	BOARD MEETING INFORMAL	
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760910	CED LUNCH	LAW OFFICE
750923	CED LUNCH	DUNALD H. COHEN
7,0924 760925	CED LUNCH	
760930	CED LUNCH	
761009	CED LUNCH	
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750901	CED LUNCH HRJ PROPOSAL	GOVERNMENT
760610 761022	CED LUNCH INGO WARNKE ET AL CED LUNCH JENKINS LOVE MATCH	EXHIBIT
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761011	CED LUNCHED!	
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760810 760426	CED MEETS W/B BEATTY RE: STEW CED MEETS W/B SALKIM P SALANT	
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	760621	INTERCHANGE EXEC RETREAT SITUA
	760500	INTERCHANGE MEETING INTERCHANGE DV MISSIONS
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The People Business

2240 24th Street, San Francisco, CA 94107 (415) 647-0440 P.O. Box 786, Marshall, CA 94940, (415) 663-8111

PAIS 1. PITTER

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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	761022	HARCOURT BRACE PROJECT
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	770709	MORNING COURT (SEE 7/8)
	770330	MORNING COURT AND LUNCH
	770427	MORNING COURT/LUNCHEON
	770802	MORNING MEETING (SEE 7/26) MORNING MEETING (SEE 7/26)
	770219	MORMING MEETING: LOTTERY
	770528	MORNING MTG IN SANTA MONICA
	770117	MORNING HTG 7/26;8/2;8/16
	770726	MOTORCYCLE GAME
	770903	ATG RE HEALTH SERVICES & AVIAT
\	770625	MTG RE RELIABLE MORTGAGE
	730109	NEW CONFIG. SYN. RELIGION
	771231	NEW YEARS EVE GAME CIRCLE
	770617	DETED CCHRAG/HARPERIS INTERVIE
	770514	PHOTE CONVERSATION W/D FREER
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	750125	SOCIAL COUPLES GAME
	771007	SOCIAL DIMNER-GAME
	771005	SUCIAL GAME
	771019	SOCIAL GAME
	775317	STAFF MEETING
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