

EIR Human Rights

LaRouche files human rights complaint with the OAS

Jailed American political dissident Lyndon H. LaRouche on July 30 filed a complaint with the Inter-American Commission on Human Rights of the Organization of American States (OAS). It charges the United States government with major human rights violations over the course of a decade, "to silence the voice of presidential candidate and economist Lyndon H. LaRouche, and to bankrupt, through financial warfare, the political movement associated with him."

The complaint was personally delivered to the office of the Inter-American Commission on Human Rights at OAS headquarters in Washington, D.C. by Dennis Small, who was convicted along with LaRouche by a U.S. federal court in Alexandria, Virginia, in December 1988. Besides Mr. LaRouche, the signators of the complaint are William Wertz, Edward Spannaus, Michael Billington, Joyce Rubinstein, and Dennis Small—all originally convicted with LaRouche in the 1988 Alexandria case. The Complainants urged the OAS Commission members to promptly take up the LaRouche case at their September 1991 meeting.

We publish the complaint here, excluding introductory sections and exhibits.

III. Alleged human rights violations

The violations charged in this Complaint result from a decade-long campaign by former and present U.S. government officials to silence the voice of presidential candidate and economist Lyndon H. LaRouche, and to bankrupt, through financial warfare, the political movement associated with him. These efforts have caused the jailing of LaRouche and others—including all the signators of this Complaint—through the use of contrived evidence as well as a government coverup of exculpatory evidence, and have stopped the publi-

cation of a national newspaper and scientific journal associated with LaRouche, via illegal government seizure of the companies which published them.

From 1986 to the present, fifty (50) political activists with the LaRouche political movement across the United States have been indicted on criminal charges, in every case for "administrative" or "financial" infractions which were of a civil (not criminal) nature. The philosophical association founded by Mr. LaRouche, as well as five (5) companies associated with the LaRouche movement were similarly indicted. Of the 50 persons indicted, 18 have been convicted, and 11 have been jailed—including all of the signators of this Complaint.

This consort of illegal action continues today, with continuing deprivation of the most fundamental human rights: the freedom to have and disseminate one's political beliefs and ideas without fear of government persecution.

The specific, most essential violations of the American Declaration of the Rights and Duties of Man, and the American Convention of Human Rights, are two:

FIRST: Article IV of the American Declaration of the Rights and Duties of Man, of which the United States is a signator, guarantees every person:

the right to freedom of investigation, of opinion, and of the expression and dissemination of ideas, by any medium whatsoever. This same "right to freedom of thought and expression" is codified in Article 13-1 of the American Convention on Human Rights, of which the United States is also a signator. The right to freely associate is similarly at issue and is found at Article XXII of the Declaration and Article 16 of the Convention.

Likewise, Article XVIII of the American Declaration of



Complainant Dennis Small and paralegal Mary Jane Freeman deliver LaRouche's complaint of human rights violations to the Organization of American States headquarters in Washington.

Stuart Lewis

the Rights and Duties of Man, proclaims for every person that:

the courts will protect him from acts of authority that, to his prejudice, violate any fundamental constitutional rights.

Article 25 of the American Convention on Human Rights similarly explains that all individuals are entitled to:

protection against acts that violate his fundamental rights recognized by the constitution . . . even though such violation may have been committed by persons acting in the course of their official duties.

SECOND: Article XXVI of the American Declaration of the Rights and Duties of Man states that every person has the right:

not to receive cruel, infamous or unusual punishment.

Mr. LaRouche has been in jail for the last 2.5 years and is almost 69 years old, was given a 15-year sentence on Jan. 27, 1989, and has an official release date from prison of May 1999—for alleged crimes which are essentially “administrative” in nature. This can only be characterized as a “slow death sentence,” “cruel,” “infamous,” and “unusual” by any standards of civilized justice. Other political associates of LaRouche, men and women mostly in their forties, have received similarly barbaric virtual life sentences in a series of related Virginia state prosecutions: 77 years (Michael Billington); 39 years (Anita Gallagher); 38 years (Paul Gallagher); 34 years (Laurence Hecht); 25 years (Donald Phau); among others.

In the case of LaRouche and his collaborators, we have a classical instance of political prisoners, in a country which denies there are any such cases within its borders.

It is particularly important that the Inter-American Commission on Human Rights investigate this complaint promptly, given the fact that the government accused, that of the United States of America, has anointed itself guardian of “human rights” and “democracy” in nations in every corner of the globe, including in our hemisphere, and has been more than willing to use deadly military force at its whim—as the people of Panama and Iraq, among others, can well attest. The U.S. government must be held accountable to the same high standards of human rights protection that it so vocally demands of others.

Because of the political nature of the violations charged herein, we present the facts of the case in three steps:

- 1) the specifics of the trial violations as such, which led to the incarceration of LaRouche et al.;
- 2) the evidence regarding the government’s coverup of its own illegal actions in this case; and
- 3) the nature of the political beliefs espoused by LaRouche, which triggered the government’s decision to silence him.

1. The facts of the trial

On October 14, 1988 LaRouche and the other Complainants listed above were indicted in Alexandria, Virginia, and falsely charged with conspiring to solicit loans from political supporters which they never intended to repay. LaRouche was additionally accused of conspiring to conceal his income sources from the Internal Revenue Service (IRS).

The fact is that the government itself manufactured these economic “crimes,” the antecedents of which are as follows:

The prime initiator of the illegal consort of action against the LaRouche movement is former U.S. Secretary of State Henry Kissinger. On August 19, 1982, Kissinger, then a private citizen, wrote a “Dear Bill” letter to then-FBI Director William Webster, asking him to look into initiating some kind of action against the bothersome LaRouche. After a further exchange of letters among Webster, FBI Assistant

Director Oliver Revell, and Kissinger, the FBI determined on January 31, 1983 that the "investigation" of LaRouche "is warranted. We are, therefore, initiating an investigation and the investigating Agents will be in contact with you."

A period of intense public defamation and financial warfare against the LaRouche movement followed, which reached its peak when two LaRouche Democrats won the Democratic Party nomination for Lt. Governor and Secretary of State in the state of Illinois on March 18, 1986. Over the next four months, 23,000 hostile news articles appeared across the U.S., many of them based on an anti-LaRouche pamphlet circulated by the Anti-Defamation League of B'nai B'rith (ADL), which has documented links to the CIA.

- Oct. 6, 1986: The government executed a pre-dawn, 400-man armed raid on the Leesburg, Virginia offices of publishing companies associated with LaRouche, in the presence of the national media. Six people were hauled out of their homes at gun-point and arrested pursuant to an indictment issued out of Boston, Massachusetts. The raid resulted in all of the companies' records being seized, disrupting business for a significant period of time, and the eventual indictment of 50 political activists.

- April 21, 1987: In another early-dawn raid, the U.S. government seized two publishing companies and a scientific foundation associated with the LaRouche movement, using involuntary bankruptcy laws. The companies were closed permanently by the government's action, making it impossible for them to repay any of their loans. A nationwide dragnet of FBI, Secret Service and IRS agents began interviewing, pressuring and intimidating former financial supporters of the three firms. They were told that if they wanted to get their loans back, their only hope was to assist the government in prosecuting LaRouche et al.

The Boston trial ended in a mistrial in May 1988. So on October 14, 1988, three weeks before the November 1988 presidential elections in which LaRouche was a registered presidential candidate, LaRouche was again indicted, this time in Alexandria, Virginia, along with the other Complainants.

Despite the fact that the Complainants were charged with intentional non-repayment of political loans, trial judge Albert V. Bryan, Jr. ruled that the facts of the April 1987 involuntary bankruptcy seizure of the three research and publishing companies could not be told to the jury. Judge Bryan was the incorporating attorney for Interarms, one of the largest weapons exporting companies in the U.S., with special links to the U.S. intelligence community. Moreover, for many years Bryan sat on the U.S. equivalent of a special state secrets court known as the Foreign Intelligence Surveillance Court, with supervision over highly explosive "national security" cases.

With no right to present a defense; with a rush to trial that led all seven defense attorneys to protest to the court that they were unprepared to try the case; with a jury selected hastily

in a prejudiced environment of pervasive, hostile news coverage of LaRouche; and with a jury foreman who is not only a government employee with the U.S. Department of Agriculture but (it was later learned) has national security duties for Emergency Planning and Continuity of Government functions along with Lt. Col. Oliver North, a vehement opponent of LaRouche; it was a foregone conclusion that the Complainants would be railroaded into jail. They were sentenced and jailed on January 27, 1989.

On October 25, 1989, nine months after these Complainants began their jail sentences, Federal Bankruptcy Chief Judge Martin V.B. Bostetter issued a 106-page opinion declaring that the government's bankruptcy seizure of the three companies which held the loans charged in the indictment of the Complainants, had been illegal. In *Re Caucus Distributors, Inc., et al.*, 106 B.R. 890 (Bankr.E.D.Va., 1989). He specifically found that the government had acted "in bad faith" in bringing the action, and did so by engaging in a "constructive fraud on the court" to obtain the original court order. Judge Bostetter furthermore pointed to the directly political nature of the case, noting that the evidence "has led this Court to conclude that the debtors strived more to expose the world to its political viewpoint than attain private monetary gain." Judge Bostetter's finding was upheld on appeal. The Bostetter decision, however, has not led to reversal of the Complainants' convictions, nor to a reopening of the case.

The Complainants appealed the convictions to the Fourth Circuit which denied it on January 22, 1990, and the Supreme Court of the United States declined to even review the case on June 11, 1990. The violation of the human rights of the Complainants, and of other members of the LaRouche movement, continues to the present.

Numerous internationally prominent jurists and others have voiced their concern and protest. Former U.S. Attorney General Ramsey Clark, who joined the LaRouche defense team throughout the appeal process, expressed his shock at the blatantly political timing of the LaRouche indictments—three weeks before the November 1988 presidential elections. In a June 19, 1990 speech before the Parallel Activities of the CSCE conference in Copenhagen, Denmark, Clark said:

I was in the Department of Justice for eight years—I never indicted a political figure before an election. . . . [LaRouche] was on the ballot in twenty states. What's going to happen to his campaign? Nobody says he was going to get elected, but he had a right to run! He had a right to get as many votes as he could. He could have gotten quite a few votes—a million, two million, who knows.

Similarly, numerous prominent international jurists presented *Amici Curiae* briefs in support of the LaRouche appeal, and urged that justice be done. These *Amici* included:

Professor Dr. Hans Richard Klecatsky, the former Minister of Justice for the Federal Republic of Austria; Professor Dr. Albert Bleckmann of Muenster, Germany, a noted author on international law; and Jean-Marc Varaut of Paris, France, Commission Reporter of the Universal Declaration of the Rights of Defense adopted in 1987 by the bar associations of the countries of the Free World. Their briefs were reprinted in the book, *Railroad!*

In Latin America, the LaRouche appeal also drew prominent attention and support. Over 100 Senators and Congressmen from seven different countries signed a statement, published as a paid advertisement in the *Washington Post* on April 28, 1989, which read:

The undersigned, legislators from the nations of Latin America, express the hope that the Democratic politician, Lyndon H. LaRouche, known for his defense of the national sovereignty of the nations of Latin America, for his fight against drug trafficking, and in favor of the creation of a new international economic order to eliminate the International Monetary Fund's unjust policies, may immediately regain his freedom, as an expression of the justice which must characterize the government of the United States, and in observance of the principles and human rights consecrated in that nation's Constitution. We trust that North American justice, defender of human rights, will take practical steps to right the injustice of the political proceedings against LaRouche.

2. The coverup

It is the contention of the Complainants that a principal reason that justice has not been done in this case, is that the Bush Administration in Washington, D.C. is directly and personally involved in an ongoing coverup of the facts about the LaRouche case. The U.S. government is hiding behind the fig leaf of "national security" classification—as it has in the Watergate and Iran/Contra cases—in order to avoid releasing documents which prove LaRouche et al.'s innocence and the government's illegal persecution of political opponents.

Government coverup became the dominant feature in the 1987 trial of LaRouche and others, in Boston, Massachusetts, which ended in a mistrial and the eventual dropping of all charges by the U.S. government—after the convictions in Alexandria had been obtained. In the course of the Boston trial, a document surfaced which had been found in the safe of Lt. Col. Oliver North, consisting of a confidential telex, dated May 5, 1986, from Richard Secord to North, then at the National Security Council, which established beyond a doubt that LaRouche and his movement had been under surveillance, and probably targeted for infiltration and disruption as well. The now-famous telex stated, in part:

Lewis has met with FMI and other agency reps and is

apparently meeting again today. Our man here claims Lewis has collected info against Larouche [sic]—let's see how polygraph goes. Rgds, Dick.

Shortly after this document was placed on the record in the Boston case, the judge ordered George Bush, then Vice President of the United States, to search all his files for similar, possibly exculpatory material. Within two months, a mistrial was declared.

The odor of illegal government activity against LaRouche was already so prevalent in the courtroom, however, that one of the jurors told the Boston press: "We would have acquitted everybody at this point. . . . There was too much question of government misconduct in what was happening in the LaRouche campaign."

In the subsequent Alexandria prosecution of the Complainants, the government took steps to insure that all evidence of government wrongdoing was covered up. Judge Bryan was instrumental in this, denying all defense discovery motions, while ridiculing the very idea that the government might have something to cover up—despite the clear evidence from the earlier Boston trial.

The evidence which could exculpate LaRouche and his associates is currently protected by government officials' assertions of "national security" privilege. More than 56,000 pages of documents have now been acknowledged by different branches of the government to exist concerning LaRouche, Wertz, Spannaus, Small and other LaRouche associates. Specifically, the Central Intelligence Agency has admitted to reviewing an undisclosed number of documents "originated" by the CIA and found in FBI files, regarding Complainant Dennis Small and the activities of the LaRouche movement in Latin America. Although the government initially denied the Complainants' assertion that they had been falsely investigated on the pretext of Executive Order 12333's "national security" provisions, the government subsequently admitted that they have such a file but refuse to release many documents, claiming "national security" privilege.

President George Bush has the authority to declassify these documents, and what are thought to be tens if not hundreds of thousands of pages of other documents not yet identified. President Bush has been formally requested to declassify and release this "LaRouche File." To date, he has refused to do so.

3. LaRouche's political views

Over nearly ten years, Kissinger and others associated with him in the U.S. government joined in a "secret" public/private conspiracy, using government financial and law enforcement resources and media outlets, to target LaRouche, his associates and supporters for harassment, persecution, and infiltration. At Kissinger's personal instigation in an August 19, 1982 letter to then-Federal Bureau of Investigation

(FBI) director William Webster, investigations were opened against LaRouche and his collaborators, and continued under the cover of Presidential Executive Order 12333. A pretext was established by labeling LaRouche a potential "national security" threat, and these forces then employed legal and other means to attempt to obliterate an entire political movement tied to presidential candidate LaRouche.

In fact, the so-called "national security threat" consisted of the growing policy influence among the nations of Latin America and in Washington, D.C., of LaRouche's views, which collided head-on with those of Kissinger and his allies in the banking community, on issues such as:

(1) rejection of the austerity policies of the International Monetary Fund, and promotion of Third World industrial development instead;

(2) debt moratorium for developing sector nations;

(3) total war on the drug trade, targeting its financial controllers;

(4) development of the Strategic Defense Initiative; and

(5) halting U.S. support for the Contras.

The sharpest policy battle occurred over the issue of the Latin American debt crisis, and LaRouche's proposed solutions, presented in his August 1982 book-length study, *Operation Juárez*, which called for:

- the formation of a Latin American Debtors Club and Common Market to unilaterally proclaim debt moratoria on the continent's unpayable debt;

- great infrastructural development projects to quickly develop the region's physical economy;

- the replacement of the IMF and the entire Bretton Woods monetary system, with a just New International Economic Order.

Operation Juárez circulated widely among leading political layers throughout the Americas. LaRouche also discussed these ideas personally with various Third World heads of state, including Mexico's José López Portillo (1982), India's Indira Gandhi (1982), and Argentina's Raúl Alfonsín (1984).

LaRouche and his associates also presented these policies for sweeping financial reform to high level representatives of the Reagan Administration in Washington, D.C., urging their adoption on the grounds that they represented the only way to salvage the West's own banking structure, while assuring the security and stability of the U.S.'s neighbors to the South.

Some within the Reagan Administration listened to LaRouche. For example, Richard Morris, the Executive Assistant to the Advisor to the President for National Security Affairs, met repeatedly with LaRouche and a number of his associates, to receive briefings and reports on these and related subjects.

The opposing view—that of the Wall Street bankers—was represented in Washington largely by Henry Kissinger and individuals closely associated with him, such as Roy Godson, Walter Raymond, Kenneth deGraffenreid, and Lt.

Col. Oliver North. According to court testimony of Richard Morris, Godson, Raymond, and deGraffenreid repeatedly slandered LaRouche within the National Security Council, in an effort to insure that his policies were not considered:

Kenneth deGraffenreid . . . was the senior member on the Intelligence Staff [at the NSC—ed.], and he spoke to me several times about the impropriety of entertaining input from Mr. LaRouche and/or Mr. LaRouche's representatives. He was supported by a consultant for intelligence purposes, Roy Godson. . . . They described him [LaRouche—ed.] as many things. As a socialist, as a communist, as a member of the KGB, as a fascist, and always he was an extremist. Whatever he was, he was an extremist.

In July 1983, President Reagan named Henry Kissinger to head the so-called Kissinger Commission on Central America. Kissinger used this position to lock in the Reagan Administration's adoption of Wall Street's solution to the debt crisis: pay, no matter what the cost.

In October 1983, Lt. Col. North was assigned to personally escort the members of the Kissinger Commission on a tour of Central America. On March 15, 1984, he was also involved in blocking LaRouche's access to the Reagan administration, filing a National Security Memorandum recommending that a letter from Lyndon LaRouche to President Reagan on the subject of the Kissinger Commission Report on Central America, "should *not* be answered."

Ultimately, the views and interests of Wall Street prevailed. U.S. national interest was equated with whatever U.S. banks needed to collect on every penny of their debt. And U.S. national security was defined as providing for the security of these banking operations. The results are evident in the history of the 1980s. Over the course of the decade, Latin America paid the banks \$321 billion in interest payments alone, more than 177% of the total foreign debt in 1980. And yet that debt grew from \$243 billion in 1980, to \$429 billion in 1990. As a result of this looting, elementary nutrition, sanitation, and health requirements have gone unmet in every country in Latin America, and the cholera epidemic today sweeping the continent is one of the consequences.

IV. Articles of the declaration or convention which have been violated

American Declaration of the Rights and Duties of Man

Article IV. Right to freedom of expression. (See above for details.)

Article XVIII. Right to a fair trial. (See above for details.)

Article XXII. Right of association. (See above for details.)

Article XXV. Right of protection from deprivation of liberty for nonfulfillment of obligations of a civil nature.

Late repayment on loans due is a purely civil matter to be negotiated and/or litigated by the two contracting parties. Furthermore, in this case the untimely repayments were principally due to U.S. government interference, not willful deception on the part of the Complainants.

Article XXVI.—Right to due process of law. (See above for details.)

American Convention on Human Rights

Article 5.2. No person shall be subjected to cruel or inhuman punishment. (See above for details.)

Articles 8.1 and 8.2.c and d. Right to a fair trial.

8.1 Every person has the right to a hearing with due guarantees and within a reasonable time, by a competent, independent, and impartial tribunal.

The impartiality and independence of the jurors who sat on the jury which found these Complainants guilty, was not assured prior to the trial as required by U.S. law. The judge refused to ask any detailed questions of these persons prior to selection, despite an avalanche of vicious and hostile news coverage about LaRouche and his associates. In addition, the jury pool for the area consists predominantly of U.S. government employees and/or persons whose livelihood depends on government contracts.

More importantly, the man who became the foreman of the jury, Buster Horton, is a high-ranking U.S. Department of Agriculture official with top-level assignments on security issues and emergency preparedness. The Complainants did not become aware of these facts until after the trial was completed. Mr. Horton is a member of an elite one hundred person team responsible for “continuity in government” in the event of a national security threat. His activities, coordinated through the Federal Emergency Management Administration (FEMA), interface with numerous federal law enforcement agencies. In this capacity he had contact with the FBI, Justice Department and CIA officials, among others—a fact he failed to disclose during jury questioning.

It is of note that Horton sat on FEMA’s interagency coordinating body at the same period of time that Lt. Col. Oliver North sat on it for the National Security Council (NSC), whose antagonistic role at the NSC against LaRouche’s policy input is documented above.

8.2.c Right to adequate time and means for the preparation of his defense.

As Ramsey Clark wrote in the Complainants’ petition to the U.S. Supreme Court:

... seven defendants were denied their rights to a fair trial, to due process of law . . . where they were forced to trial over vigorous protest 38 days after the return of a 52-page, two conspiracy, 13-count indictment which resulted from an extensive four-and-one-half year nationwide investigation and which alleged 121 overt acts citing 14 unindicted co-conspirators, and where the government listed 53 trial witnesses and turned over a massive quantity of discovery materials during the time between indictment and trial.

8.2.d Right to defend oneself or to be assisted by legal counsel of one’s own choosing.

In a related Virginia state “securities” trial of Complainant Billington, the right to counsel was totally abrogated when, on the eve of trial, his own attorney accused him of being “incompetent” and demanded a psychiatric examination of his client by the court. Billington, who faces 77 years incarceration, filed a *habeas corpus* petition with the Virginia Court of Appeals, which states in part:

There was such a complete and total breakdown in communications between me and my attorney, Brian P. Gettings . . . that I was denied my constitutionally guaranteed right to effective assistance of counsel; [e]ven though Gettings abandoned me on the eve of trial, [and] there was another attorney who would have undertaken to represent me . . . [t]he court denied my motion to substitute counsel. . . . My counsel and the court, through its rulings, barred me from participating in the trial, thus rendering meaningless my constitutional right to be present during and participate in the [trial].

Article 9. Freedom from Ex Post Facto Laws.

No one shall be convicted of any act or omission that did not constitute a criminal offense, at the time it was committed.

Complainant Billington, along with 15 other political activists with the LaRouche movement, were rounded up and arrested February 17, 1987 on charges of having violated state of Virginia securities laws by soliciting political loans from supporters. However, at the time of the arrest (as well as the time period when the alleged crimes occurred) the Virginia State Corporation Commission had not determined that the letters-of-indebtedness given to these political supporters were in fact “securities.” Eight of these 15 individuals, including Mr. Billington, have been tried and found guilty of these “crimes.” Barbaric sentences have been handed out (77 years, 39 years, 38 years, 34 years, 25 years) and

stringent bond-on-appeal conditions have been imposed.

Article 13.1. Freedom of Thought and Expression. (See above for details.)

Article 14.1. Right to Reply

The vilification of Mr. LaRouche, his political associates and the movement they have created by news media, aided by a highly coordinated government/private apparatus (see above for details), has clearly injured the ability of their ideas to be presented before the public, free from the taint of inaccurate and offensive statements. The dissemination of these hateful characterizations of LaRouche has been widespread throughout many member states of the OAS, by aid of U.S. State Department officials.

Article 16.1. Freedom of Association. (See above for details.)

Article 25. Right to Judicial Protection. (See above for details.)

V. Names and titles of persons who committed the violation

The following list is by no means a comprehensive list of all of the public officials and/or private members who participated in the U.S. government sponsored "Get LaRouche" task force. The actions of the individuals listed below, have in some way been referenced in the text of this Complaint.

1. Mira Boland—Fact Finding Director of the Washington, D.C. Office of the Anti-Defamation League of B'nai B'rith.

2. Albert V. Bryan, Jr.—Chief Judge, U.S. District Court for the Eastern District of Virginia (Alexandria Division).

3. Charles Bryant—Virginia State Police Case Agent and Investigator on Virginia "securities" case.

4. Kenneth deGraffenreid—Senior Member of the Intelligence Staff of the National Security Council (NSC) and assistant to Walter Raymond (see below), who spread defamatory information about LaRouche within the NSC.

5. Edward Gibson—FBI Agent who was responsible for conducting most of the interrogations of political supporters of the LaRouche movement.

6. Roy Godson—A consultant to the National Security Council and the President's Foreign Intelligence Advisory Board, who participated in initial meetings in 1983-84, called to discuss actions to counteract the political influence of the LaRouche movement. He also spread slanders concerning LaRouche at the NSC. Godson was instrumental in obtaining private funding for Project Democracy's public diplomacy efforts to target opponents of the "secret" Iran/Contra efforts. (Cited in *Report of the Congressional Com-*

mittees Investigating the Iran/Contra Affair, November 7, Chapter 4, p. 97).

7. Henry Hudson—U.S. Attorney in the Eastern District of Virginia. He headed the criminal prosecution against the Complainants and oversaw and authorized the bringing of the involuntary bankruptcy against the three firms.

8. Henry Kissinger—Former U.S. Secretary of State and head of President Reagan's Kissinger Commission on Central America, who was the prime instigator in causing governmental investigations against LaRouche as an alleged threat to national security.

9. Timothy Klund—FBI Agent, Alexandria, Virginia. Lead case agent directing the Alexandria investigation against the Complainants. He also was the liaison agent between the Boston and Alexandria investigations against LaRouche.

10. John Markham—Former Assistant U.S. Attorney. Lead prosecutor for the government on the Boston case. After the mistrial there, he was assigned to the Alexandria prosecution team.

11. Donald Moore—Loudoun County Virginia Deputy Sheriff, who coordinated with both law enforcement and private members of the "Get LaRouche" task force.

12. Oliver North—Former Assistant Deputy Director for Political-Military Affairs at the NSC, who oversaw the illegal Iran/Contra operations. (See above.)

13. Mark Rasch—Attorney with the Department of Justice, Fraud Section who was assigned to both the Boston and Alexandria prosecutions against the Complainants.

14. Walter Raymond—Senior Director for Intelligence Programs at the NSC, later becoming the Special Assistant to the President, with responsibility for diplomatically promoting the initiatives of Project Democracy, including support for the Contras. He was also the author of Executive Order 12333.

15. Oliver Revell—Former Assistant Director of the FBI.

16. Kent Robinson—Assistant U.S. Attorney. Led the prosecution team and directed the investigation in Alexandria, Virginia against the Complainants.

17. S. David Schiller—Assistant U.S. Attorney. The prosecutor who designed and filed the involuntary bankruptcy petitions which illegally seized the three companies described above.

18. William Webster—Director of the CIA; and former Director of the FBI.

19. William Weld—Former U.S. Attorney for Boston, Massachusetts. Initiated the first investigation and prosecution of LaRouche and his collaborators. He later became the head of the Criminal Division for the Department of Justice and approved U.S. Attorney Henry Hudson's criminal prosecution of LaRouche et al., as well as the bankruptcy action.

Editor's note: Omitted here are Section VI, "Witnesses to the violation," and Section VII, "Addresses and telephone

numbers of witnesses," since these are not applicable to this Complaint. Also omitted is Section VIII, the documentary exhibits.

IX. Domestic legal remedies pursued

In the Fourth Circuit Court of Appeals
Petition for Bail Pending Appeal
Filed: 1/31/89 Denied: 2/07/89

In the Fourth Circuit Court of Appeals
Motion for Bond Pending Appeal Before a Three-Judge Panel
Filed: 4/05/89 Denied: 4/14/89

In the Fourth Circuit Court of Appeals
Motion for Reconsideration of Order Denying Motion for Bond Pending Appeal
Filed: 4/21/89 Denied: 4/25/89

In the U.S. Supreme Court of the United States
Application For Release Pending Appeal in the Fourth Circuit
Filed: 5/05/89 Denied: 5/11/89

In the Fourth Circuit Court of Appeals
Appeal to the Fourth Circuit
Filed: 5/25/89 Denied: 1/22/90

In the U.S. Supreme Court of the United States
Application for Release Pending Disposition of Joint Petitions for Writs of Habeas Corpus
Filed: 6/02/89 Denied: 7/89

In the Fourth Circuit Court of Appeals
Petition for En Banc Rehearing
Filed: 2/05/90 Denied: 2/16/90

In the U.S. Supreme Court of the United States
Petition for Writ of Certiorari
Filed: 5/17/90 Denied: 6/11/90

In the U.S. District Court for the Eastern District of Virginia
Wertz Motion for Modification of Sentence
Filed: 4/26/90 Denied: 5/3/90

In the U.S. District Court for the Eastern District of Virginia
Spannaus Motion for Reduction of Sentence
Filed: 9/10/90 Denied: 9/11/90

In the U.S. District Court for the Eastern District of Virginia
LaRouche Motion for Reduction of Sentence
Filed: 9/90 Denied: 9/28/90

Although the date of the most recent denial of a remedy sought by these Complainants is beyond the normal "six-month exhaustion" requirement cited in Article 38 of the Regulations of the Commission, the continuing deprivation of rights which persists in this case strongly mandates that the Commission

motu proprio take into consideration . . . information that it considers pertinent and which . . . in its opinion fulfills the requirements. (Article 26.2, Regulations.)

Complainants believe that due to the political rights and freedoms being denied both themselves and many others in the United States as a result of the abuse of government power and resources detailed herein, the Complaint warrants the Commission's attention.

The most compelling reason for the Commission to take up this Complaint is the continuing violations of human rights which exist in this case. Those continuing violations and/or deprivations are:

1. that there is an ongoing effort at this time to silence and annihilate an entire political movement, not only by the jailing and indicting of political activists, but also by (1) the denial of the right to freedom of ideas to hundreds of thousands of subscribers to publications which were illegally seized by the government, and (2) to the millions of voters who have expressed their preference to vote for LaRouche Democrats;

2. three of the Complainants (LaRouche, Wertz and Spannaus) remain incarcerated, while 10 others have been convicted and are out of jail pending the outcome of their appeals, and eight individuals and five corporations are awaiting trial;

3. one of the Complainants' parole conditions deny her the right to be a journalist for any LaRouche-associated publication;

4. one other Complainant has been denied his rights to associate with his former political collaborators; and

5. the Complainants continue to be deprived of access to potentially exculpatory evidence which could overturn their convictions because the Bush Administration has invoked claims of "national security" on documents in the possession of agencies such as the CIA, FBI, NSC, among others.

For all of the above reasons, Complainants respectfully urge the Organization of American States' Inter-American Commission on Human Rights to investigate the charges detailed herein.