Comments — Not all questions and answers are covered in Mr Grinstead's summary. Some exchanges appear that never occurred. Some answers do not take into consideration answers to previous questions which tend to give a false impression of inconsistency.

The following Numbered comments correspond to Numbers on Grinstead memo.

1. Small point — I don't think we discussed events — If we had your comment "There was no indication Nor did you disclose to us that either of these letters was ever published."

2. I do not recall Mr Grinstead responding this way.

3. I don't believe I stated that I had prepared the document disclosed at the table — only that I had prepared a document. I certainly did not have time to read a 19 page memo supposedly prepared 18 months ago and therefore, could not be in position to say anything conclusive about it.

4. My response was based on a misunderstanding of what he asked and was not intended (as implied) to indicate I knew what was in the document — my response was merely a philosophical indication that because appellant was suing the Government did not rule out the possibility that Department policy was consistent with the appellant's overall position.

5. I said "No" and went no further. The rest of the sentence is volunteered by Mr. Grinstead.

6. Grinstead fails at this point to note that I specifically indicated that the discussion was "heated" which was meant to imply that assessing what was agreed to would be difficult.

7. This question was not asked and appears to be an attempt to set the stage for a claim that I was repeatedly warned about "lobbying" (which was never defined at the meeting). Further and important Grinstead fails to note that the most vivid recollection I had of the meeting was Beattie's remark about being

very disturbed about making material critical of the Department.

8 "Totally knows him" — was not a term I used to my recollection — use slang is not characteristic of me.

9 I have No Recollection of making this statement and don't believe I did.

10. I did say the document was obtained from Bayh's office. When Grinstead asked Q "what purpose" I said (exact quote) "I don't know". The questions and the answers are stated inaccurately.

11. I don't think either question or answer are properly phrased. I think I said "Is that all the material" — Grinsteads response was much more evasive than indicated.