

DEFINITIONS

As used herein, the terms documents, records, reports, and statements refer to any and all "writings", "recordings" and "photographs", as those terms are defined in Federal Rule of Evidence 1001, relating to the subject matter or matters referred to in each paragraph of the foregoing.

1. All records of the United States Attorney and the Department of Justice relating to the Letelier assassination.

2. All reports of the Federal Bureau of Investigation relating to the Letelier assassination, including inter alia F.B.I. interviews recorded on Form 302 with Michael Townley or any of the other defendants named in this action. See complaint attached hereto.

3. All records of the C.I.A. relating to the Letelier assassination.

4. All documents or records of the United States Attorney, the Justice Department, the Federal Bureau of Investigation or the State Department relating to the attempt by the United States government to have extradited from Chile, Juan Manuel Contreras Sepulveda, Pedro Espinoza Bravo and Armando Fernandez Larios, including inter alia all documents filed by the United States Department of Justice in the Supreme Court of Chile in regards to the request for extradition.

5. All documents or records reflecting the reaction or response of the Chilean government, of General Augusto Pinochet Bugarte and of the C.N.I. or D.I.N.A. to the United States government's investigation of the Letelier assassination.

6. All documents or records reflecting the official or unofficial response of the Chilean government or of General Augusto Pinochet Bugarte to requests for information by the United States government.

7. All documents or records written by any of the defendants named in this action.

8. All documents or records in which one of the defendants in this action is named.

9. All statements given by Michael Townley to General Orozco regarding the Letelier assassination, including inter alia a March 29, 1978 statement given to Orozco in Chile and an April 7, 1978 statement given to Orozco in Quantico, Virginia.

10. All agreements between Chile and the United States in regards to obtaining and disseminating information about the Letelier assassination, including inter alia the agreement entered into on April 7, 1978 and signed by Earl Silbert and Enrique Montero.

11. All documents which memorialize conversations in which one or more of the defendants named in this action participated.

12. All statements made by former Ambassador George Landau regarding the Letelier assassination or regarding the issuance of Paraguayan passports under false names to Michael Townley and Armando Fernandez Larios.

13. All statements made by Conrado Pappalardo or President Stroessner of Paraguay regarding the issuance of Paraguayan passports under false names to Michael Townley and Armando Fernandez Larios, or regarding the Letelier assassination.

14. All documents regarding Michael Townley's travel to and from Chile, and to and from the United States, under his own

name or under false names. The false names include, inter alia, Kenneth Enyart, Hans Petersen Silva, Andres Wilson and Juan Williams.

15. All documents or records regarding the decision by the United States Attorney or the Department of Justice to investigate and prosecute criminally any of the defendants named in this action.

16. All documents or records regarding the decision by the United States Attorney or the Department of Justice not to investigate or not to prosecute criminally any of the defendants named in this action.