

INTERROGATORY NO. 2: Collection of information about any plaintiff or organization via wiretaps, bugs or other means of electronic surveillance without judicial warrant targeted against persons other than any plaintiff or organization.

ANSWER TO INTERROGATORY NO. 2: A review of the appropriate indices reveals no information responsive to this interrogatory with regard to wiretaps, bugs, or other means of electronic surveillance undertaken with or without judicial warrant.

INTERROGATORY NO. 3: Photographing of any plaintiff or organization.

ANSWER TO INTERROGATORY NO. 3: All photographs and details in the files responsive to this interrogatory have been previously furnished to plaintiffs.

INTERROGATORY NO. 4: Audio recording of any plaintiff or organization.

ANSWER TO INTERROGATORY NO. 4: See answers to interrogatories numbers 1 and 2. If "audio recording" is something other than "wiretaps, bugs or other means of electronic surveillance," then plaintiffs should further elucidate.

INTERROGATORY NO. 5: Surreptitious entry into the home, apartment, lodging, or other premises in which any plaintiff or organization resided, did business, or might otherwise have been considered to have had a proprietary interest.

ANSWER TO INTERROGATORY NO. 5: A complete review of the main files from FBIHQ and the Minneapolis Field Office reveals no information which would indicate an affirmative response.