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Exhibit
(C)

7734 Herschel Ave., Suite K
La Jolla, California 92037
November 10, 1980

Mr. Monson Hayes
President
Maxwell Laboratories Inc.
8835 Balboa Avenue
San Diego, California 92123

Dear Mr. Hayes:

First, let us offer our congratulations on your election as President of Maxwell Laboratories, Inc. and second, express our hope that under your direction Maxwell Laboratories, Inc. may begin to return some remuneration to its shareholders.

We are writing with regard to the Shareholders' meeting on November 21, 1980. We have been shareholders of Maxwell Laboratories, Inc. since shortly after the inception of the company. In that time we have waited, in vain, for a return on our investment.

We would like to see as an item for discussion at the meeting on November 21, 1980, the matter of return on investment for the shareholders, including dates and amounts of dividends to be paid.

In addition, we understand the company is making a major investment in an activity called "Directed Energy Beams Weapons." Since this represents a major investment of funds and effort we would like to know why this was not referred to in the Annual Report.

As an additional item on the agenda, we would like to see a discussion of the "Directed Energy Beams Weapons", including costs involved to date, expected costs, expected profitability and impact on investment return to shareholders.

Are there any plans at present for a public offering on the stock and/or are there any plans for a merger that would give a return on all investments, even to the minority stockholders? We would like to see all of the above points addressed.

Hugh R. Young Sr.
Hugh R. Young, Sr.

Geraldine J. Young
Geraldine J. Young

cc: d. O'Rourke

Exhibit
(d)

August 6, 1981

Dr. William H. McMaster
President
COMPUTRAD, INC.
351 Polk Way
Livermore, California 94550

Dear Bill:

We would appreciate it if you would advise us of the current status of Computrad, Inc. In particular:

- 1) What, if any, are the current business activities of Computrad?
- 2) Give us a list of the assets, liabilities and any potential liability of the corporation.

Very truly yours,

RORACK

By Alan C. Kolb
Alan C. Kolb

By Ray O'Rourke
Raymond C. O'Rourke

c/o Dr. Raymond C. O'Rourke
7949 Lowry Terrace
La Jolla, California 92037

Exhibit
(e)

8888 Balboa Avenue
San Diego, CA 92123

January 6, 1988

Dr. Raymond C. O'Rourke
7949 Lowry Terrace
La Jolla, CA 92037

Dear Ray,

I have received your handwritten letter dated December 15, 1987.

The matter of the division, and distribution from Rorack, of the 13,500 shares of Maxwell stock formerly held in the name of Rorack was finally settled between us by means of the letter from me to you dated March 9, 1984 which you signed and accepted (copy attached). Of the 13,500 shares, 6,750 were distributed to you and you exercised dissenter's rights and were paid \$143,437.50 by Maxwell. I did not exercise dissenter's rights as to my 6,750 shares, which shares were distributed to me. As the result of this settlement, I had no further claim or right to your 6,750 shares or the proceeds of \$143,437.50, and you had no further claim or right to my 6,750 shares. You had no authority to purchase on margin or otherwise any shares in the name or for the account of Rorack or me personally, and you had no authority to reinvest the \$143,437.50 for the account of Rorack or for my account. Whatever shares you purchased on margin or otherwise were strictly for your own personal account, for your personal benefit or risk, and not for my account, benefit or risk, or the account, benefit or risk of Rorack. In this regard, please read the next to the last paragraph of the letter from Karl to Chipper dated July 6, 1987 (copy attached).

You have no right or authority to look to me or Rorack to satisfy Bateman Eichler's margin call, and any suit you or Chipper bring against Bateman Eichler, Goldman Sachs or any other party would be solely for your account and at your expense. Chipper has no authority to represent or speak for, and does not represent, me or Rorack in any suit against Bateman Eichler or Goldman Sachs, or otherwise, and he should not look to me or Rorack to pay his legal fees.

There is no "2nd payment of (144K)" due to Rorack or you. Neither Rorack nor I have any claim or action against Bateman Eichler or Goldman Sachs, and I have no intention to sue them either in my name or in the name of Rorack.

Ray, as far as I am concerned, the principal issue regarding Rorack was resolved in 1984 when the 13,500 shares were divided between us. If there are any "loose ends" or if there is any "closing-out" to do, if you don't want Karl Samuelian involved, then in all fairness to me, Chipper should not be involved either. Maxwell has not paid Parker Milliken or Karl Samuelian for legal services rendered for my personal account or with respect to Rorack matters. If you want to retain an independent lawyer to represent you regarding Rorack, I can do the same.

Sincerely,



Alan C. Kolb

Exhibit (f)

Albert O. O'Rourke

Attorney at Law

7949 Lowry Ter., La Jolla, Calif. 92037

(619) 459-7510

October 6, 1988

Mr. Michael Alpert, Esq.
Gibson, Dunn, and Crutcher
600 B Street
San Diego, Cal. 92101

Dear Mr. Alpert:

I have not heard back a response from your Client, Mr. Clifford V. Brokaw III and IRT Corporation in regard to the enclosed letter to Dr. Alan Kolb of Maxwell. I assume you know that Maxwell is in a \$30,000,000 Default in regard to Case No. 598861, San Diego Superior Court and cannot complete this purchase of IRT's assets in any event.

Furthermore, a Constructive Trust is being placed upon Maxwell's assets and the resignation of its entire Board of Directors (except Dr. Alan Kolb) is to be made at the Maxwell Shareholders Meeting in December (?), 1988.

There could perhaps be a "Stock swap", acquisition, or merger of IRT by Maxwell, bringing some or all of IRT's personnel over to Maxwell, if they desire such.

At the present time, IRT's stock is essentially worthless (i.e., around \$.50 to \$.75). Maxwell's stock not only has its quoted \$11.75 value, but something like \$10. per share more due to liability of the underwriters Goldman, Sachs and Maxwell's law-firm Parker, Milliken, Clark, O'Hara and Samuelian for violations of Section 10 B 5 of the 1934 Securities Exchange Act and CCP, Section 340.6 (Attorneys' Concealment). Such price reflects the \$21.25 former price of Maxwell stock before the S-Cubed merger in 1984, which caused Maxwell's price decline. The IRT situation is essentially the same, i.e., a Company in near bankruptcy, being acquired or selling major parts of its assets.

Both for your protection (Lantham and Watkins, the Attorneys who represented S-Cubed are arguably also liable under CCP, Section 340.6), I bring these matters up to you and your IRT Clients. This is to say that any exchange between IRT and Maxwell must be absolutely and unequivocally "arms length", since such was not the case in the S-Cubed merger. Please inform me of your Clients' intentions.

Sincerely,


Attorney Al O'Rourke

AO:m

CC - Alan Kolb, RORACK, Maxwell Laboratories Inc.

Exhibit
(g)

"Man Who Saved Maxwell"

Albert O. O'Rourke

Attorney at Law

7949 Lowry Ter., La Jolla, Calif. 92037
(619) 459-7510

November 17, 1987

Dear Fellow Maxwell Shareholders:

Greetings from "the man who saved Maxwell". I am enclosing various Documents for your review to let you know about the true condition of Maxwell Laboratories Inc. and your investment in it, either current or in the past, i.e., back to 1983 when the Company first went Public. I would hope you would read the enclosed Documents and attend the December 3, 1987 Maxwell Shareholders' Meeting at the San Diego Marriott Hotel at 333 West Harbor Drive, San Diego, California at 9:00 a.m.

It is no mystery that Maxwell Laboratories Inc. has nearly collapsed as far as its stock value. While the Board of Directors is greedily boosting their salaries once again, your own investment hovers near extinction. This is no accident or freak of Nature as claimed by the Board of Directors. The reasons are as follows:

1. As you may have noticed, after three years of Maxwell's having an elaborate cover of a "Rail Gun" or "SDI" Picture, such has now been dropped. Furthermore, Maxwell's participation in Government Programs of SDI with DARPA and the Department of Energy has also been dropped. This is because the Company had absolutely no ability to even be in these fields, yet chose to do so to create false illusions about their capabilities so that Company Insiders could dump their Maxwell Stock at inflated prices on a gullible Public. I am specifically referring to Maxwell Directors and Officers Dr. Alan Kolb, Karl Samuelian, Esq., Dr. Kedar Pyatt, and worst of all Peter Saccerdote and Goldman Sachs who are supposed to be making Maxwell's stock price go up and not down. To say that these individuals have manipulated the Stock Market is to state the obvious. To state that such individuals should resign in disgrace is also to state the obvious and such will be stated formally by myself and others at the Maxwell Shareholder's Meeting.

2. What your Company needs is a total reorganization which clearly defines those precise areas that Maxwell is capable of participating in, with a profitable return. This means sending the "Rail Gun" out to the desert where it belongs, i.e., on a scrap heap. Further, Maxwell needs an active network of several brokerage houses making a market in the stock. Goldman Sachs' only interest

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Western Union Mailgram

4-027145S296002 10/23/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-23 0229P EST

RAYMOND O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 TDRN LA JOLLA CA 138 10-23 0229P EST
FON 6192795100
SEAN MALLOY
MAXWELL LABORATORIES RPT DLY MGM COPY MESSAGE
8888 BALBOA AVE
SAN DIEGO CA 92123

DEAR SEAN,
YOU WILL PLEASE OBTAIN A STATEMENT OF EXACTLY HOW MUCH CASH MAXWELL CURRENTLY HAS OF THIS DATE. THIS IS IN REGARD TO A STOCK REPURCHASE OF MAXWELL'S SHARES TO STABILIZE MAXWELL STOCK PRICE. AS YOU MUST KNOW BY NOW WITHOUT ANY MAXWELL INTERVENTION MAXWELL STOCK PRICE IS DO TO COLLAPSE ON MONDAY BECAUSE OF THE INABILITY OF THE BROKERAGE HOUSES TO COVER MAXWELL. HENCE THERE MUST BE MAXWELL INTERVENTION. I REMIND YOU THAT YOU ARE WELL AWARE OF ALL THE PRIOR PROBLEMS WITH MAXWELL WHICH I HAVE BEEN INFORMING YOU ABOUT FOR SEVERAL MONTHS NOW. THEREFORE YOU AND KARL SAMUELIAN MUST DO SOMETHING ABOUT THIS PROBLEM RIGHT NOW. PLEASE CONTACT ME OVER THE WEEKEND AT THE TELEPHONE NUMBER BELOW IF YOU HAVE THE CASH FIGURE AVAILABLE.

SINCERELY,
ATTORNEY AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037
(619) 459-7510
7949 LOWRY TERRACE
LA JOLLA CA 92037

14:29 EST

MGMCOMP

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
23AM



4-020142S296002 10/23/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-23 1257P EST

AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 TDRN LA JOLLA CA 144 10-23 1257P EST
FON 6192795100
DR ALAN KOLB
MAXWELL LABORATORIES RPT DLY MGM COPY MESSAGE
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR ALAN,

YOUR SECRETARY MYRNA INFORMED ME THAT YOU WOULD BE OUT OF TOWN, BUT NEVER THE LESS, IT IS ABSOLUTELY IMPERATIVE THAT YOU CONTACT EITHER RAY O'ROURKE OR I OVER THE WEEKEND OF OCTOBER 23 TO 25. THE PRICE OF MAXWELL'S STOCK IS GOING TO GO DOWN TO BENEATH THE \$5 RANGE BY THE BEGINNING OF NXT WEEK BECAUSE OF NUMEROUS MARGIN CALLS AGAINST MAXWELL SHAREHOLDERS. DO YOU HAVE ANY IDEA OF YOR LIABILITY IN THIS MATTER? MAXWELL CERTAINLY HAS SUFFICIENT CASH ASSETS TO STEP INTO THE OPEN MARKETPLACE AND STABILIZE THE STOCK PRICE AS OTHER SAN DIEGO COMPANIES ARE DOING. I WOULD REMIND YOU AS YOU CAN CHECK WITH KARL SAMUELIAN, ESQ, THAT EVEN UNDER THE LAWS OF THE STATE OF DELEWARE, MAXWELL'S DIRECTORS AND OFFICERS ARE LIABLE FOR RECKLESS OR GROSSLY INCOMPETENT ACTIONS.
PLEASE CALL RAY OR I OR KARL IMMEDIATELY.

AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

12:56 EST

MGMCOMP

6194597510 MGMB TDRN LA JOLLA CA 445 10-24 0113P EST
ZIP

DOCTOR ALAN KOLB
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR ALAN,

I HAVE NOT HEARD BACK FROM YOU AND SO I MUST ASSUME THAT I MUST GIVE YOU LEGAL NOTICE IN REGARD TO THE TELEPHONE CONVERSATION BETWEEN MYSELF AND MAXWELL'S ATTORNEY KARL SAMUELIAN IN REGARD TO THE POSITION OF THE BOARD OF DIRECTORS OF MAXWELL'S DECISION OF OCTOBER 21 1987 NOT TO BEGIN REPURCHASE OF MAXWELL SHARES UPON THE OPEN MARKET. PLEASE BE ADVISED AS FOLLOWS:

1. IT IS AN ENTIRELY INCREDIBLE AND RECKLESSLY NEGLIGENT ACT OF THE BOARD OF DIRECTORS NOT TO PURCHASE MAXWELL SHARES AT THE PRESENT TIME. AS YOU KNOW, THE COMPANY HAS 2 MILLION DOLLARS IN CASH AND COULD HAVE COVERED AN EQUITY LOSS OF HALF THE COMPANY'S VALUE FOR SOMETHING LIKE 400 TO 500 THOUSAND DOLLARS I.E. SUCH AMOUNT COVERING MAXWELL'S NUMBER OF SHARES TRADED OF AROUND 40 TO 50 THOUSAND SHARES TRADED LAST WEEK.

2. I FULLY INTEND TO FILE A CIVIL LAWSUIT THIS WEEK SEEKING A CONSTRUCTIVE TRUST OVER MAXWELL'S ASSETS IN ORDER TO COMPEL THE PURCHASE OF MAXWELL SHARES AND THE STABILIZATION OF MAXWELL'S PRICE IN THE BEST INTEREST OF MAXWELL SHAREHOLDERS. AS I UNDERSTAND IT FROM KARL, YOU WISH TO USE THE 2 MILLION DOLLARS ON SOME OBSCURE COMPANY PROJECT. IT GOES WITHOUT SAYING THAT THE COMPANY'S CHAIRMAN OF THE BOARD SHOULD NOT BE EITHER OUT OF TOWN OR UNAVAILABLE AND SIMPLY DO NOTHING IN THIS CRITICAL TIME PERIOD. FURTHER, I INTEND TO SERVE AS PARTY DEFENDANTS SUCH PERSONS AS SEAN MALLOY, PETER SARCDOTE, AND EACH AND EVERY OTHER MAXWELL OFFICER AND DIRECTOR. SINCE YOU HAVE AN UPCOMING BOARD OF DIRECTORS MEETING AND A SHAREHOLDERS MEETING, I THINK IT IS RATHER OBVIOUS WHEN THESE PERSONS WILL BE SERVED.

3. IN REGARD TO THE ACTUAL STOCK MECHANICS, I WOULD REMIND YOU AND THE OTHER MAXWELL BOARD OF DIRECTORS AND OFFICERS, THAT ONCE MAXWELL'S PRICE APPROACHES \$5 PER SHARE IT WILL NO LONGER BE

TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

PAGE 2

Western Union Mailgram

MARGINABLE UNDER SEC REGULATIONS AND WILL HENCE TOTALLY COLLAPSE TO \$1 OR \$2, IF NOT LESS. KARL HAS INFORMED ME THAT EVEN THIS ABSURD EVENTUALITY DOES NOT AFFECT THE COMPANY OR ITS BOARD OF DIRECTORS. I THINK IT IS OBVIOUS THAT THE SHAREHOLDERS THINK OTHERWISE AND HENCE IS THE REASON FOR MY FILING A CIVIL LAWSUIT WITH APPLICATION FOR A CONSTRUCTIVE TRUST.

I WILL BE AVAILABLE ALL THIS WEEK AND I WOULD STRONGLY SUGGEST THAT YOU CONTACT ME AT YOUR EARLIEST OPPORTUNITY. I WOULD REMIND YOU THAT YOUR PERSONAL LIABILITY IS SEVERAL MILLIONS OF DOLLARS ALREADY AND

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4-016470S297002 10/24/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-24 0144P EST

DR RAYMOND C O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGMB TDRN LA JOLLA CA 294 10-24 0144P EST
ZIP
SEAN MALOY, CHIEF FINANCIAL OFFICER
CARE MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR SEAN

I AM PUZZLED BY YOUR NOT CALLING ME ABOUT MAXWELL'S CASH POSITION SO I AM THEREFORE GIVING YOU LEGAL NOTICE AS FOLLOWS:
(1) KARL SAMUELIAN HAS INFORMED ME THAT MAXWELL HAS AT LEAST \$2 MILLION IN CASH. THIS WAS CERTAINLY A SUFFICIENT SUM TO COVER A MAXWELL SHARE REPURCHASE WHICH WOULD HAVE STABILIZED MAXWELL'S PRICE DURING THE PAST WEEK. INDEED A SUM OF AROUND 400,000 TO 500,000 WOULD HAVE COVERED SUCH. THIS IS EXACTLY WHAT EACH AND EVERY OTHER SAN DIEGO COMPANY DID EXCEPT MAXWELL IN THE PAST WEEK.
(2) I AM FILING A CIVIL LAWSUIT THIS WEEK TO PLACE A CONSTRUCTIVE TRUST OVER MAXWELL'S ASSETS TO PROTECT THE MAXWELL SHAREHOLDERS FROM FURTHER GROSSLY NEGLIGENT ACTIONS BY MAXWELL'S OFFICERS AND DIRECTORS. IN THE MEANTIME OUT OF MAXWELL'S CASH RESERVE YOU WILL NOT MAKE ANY PAYMENTS FOR THINGS LIKE BUILDINGS, MORTGAGES OR OTHER NON-ESSENTIAL MATTERS. I INTEND TO GET A JUDGE'S ORDER FOR THE SHARE REPURCHASE PLAN AND USE SUCH CASH AS IT IS STILL AVAILABLE.
(3) SUCH LAWSUIT WILL BE SERVED UPON YOU PERSONALLY AS WELL AS OTHER OFFICERS AND DIRECTORS. I AM PUZZLED BY YOUR ACTIONS WHICH ARE TOTALLY IRRESPONSIBLE IN THE EXTREME ACCORDING TO THE STANDARDS OF ANY ACCEPTABLE FINANCIAL OFFICER BEHAVIOR. FURTHER YOU HAVE KNOWN PERSONALLY FOR SOMETHING LIKE TWO YEARS THAT ALL OF THESE PROBLEMS ABOUT MAXWELL WERE COMING TO A HEAD AND THAT MEETINGS BETWEEN MYSELF, KARL SAMUELIAN AND ALAN KOLB HAVE BEEN GOING ON REGULARLY AT MAXWELL FOR SUCH TIME. NEVERTHELESS YOU HAVE NOT TOLD A SINGLE SHAREHOLDER ABOUT SUCH AND HAVE OBVIOUSLY BREACHED YOUR FUDICIARY DUTIES TO DO SUCH.

SINCERELY
ATTORNEY AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
25AM



4-010534S298002 10/25/87 ICS IPMBNGZ CSP SDGB
1 6194597510 MGM TDBN LAJOLLA CA 10-25 0644P EST

RAYMOND C OROURKE
7949 LOWRY TERRACE
LAJOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGMB TDBN LAJOLLA CA 120 10-25 0644P EST
ZIP
DOCTOR KEDAR PYATT JR
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123

DEAR DOCTOR PYATT: I HAVE BEEN INFORMED BY KARL SAMUELIAM ESQ THAT AS A DIRECTOR OF MAXWELL YOU HAVE VOTED AGAINST A SHARE REPURCHASE OF MAXWELL STOCK TO STABILIZE MAXWELLS PRICE. I WOULD REMIND YOU THAT A CIVIL LAW SUIT IS BEING FILED THIS WEEK IN SAN DIEGO TO PLACE A CONSTRUCTIVE TRUST ON MAXWELLS ASSETS FOR THE PROTECTION OF THE SHAREHOLDERS AND THAT YOU WILL BE NAMED A DEFENDANT IN SUCH ACTION WITH DAMAGES DATING BACK TO THE MERGER OF SYSTEMS SCIENCES AND SOFTWARE INC INTO MAXWELL BACK IN 1984. I WOULD STRONGLY SUGGEST THAT YOU CONSULT WITH KARL ABOUT YOUR LIABILITY. SINCERELY,
ATTORNEY AL OROURKE

18:43 EST

MGMCOMP

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
27PM



4-041611S300002 10/27/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-27 0932P EST

RAYMOND O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGM TDRN LA JOLLA CA 192 10-27 0932P EST
ZIP
ALAN KOLB/RORACK-MUTY HAYES
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR ALAN AND MONTE

I DO NOT KNOW WHY YOU HAVE NOT CONTACTED ME SINCE KARL SAMUELIAN STATED TO ME THAT YOU WOULD ACCEPT OR RETURN MY PHONE CALLS. I SUGGEST YOU LOOK AT THE SAN DIEGO UNION OF TUESDAY, OCTOBER 27TH 1987 IN REGARD TO MAXWELL'S BUYBACK OF ITS SHARES. THE NEWS ARTICLE STATES THAT YOU ARE BUYING BACK 750,000 SHARES WHEN IT WAS MY UNDERSTANDING THAT YOU WERE ONLY BUYING BACK 75,000 SHARES ACCORDING TO KARL. PLEASE CONFIRM OR CORRECT THIS NUMBER. FURTHER, YOU MUST CONTACT EITHER MYSELF OR DAVE EVANS IN REGARD TO USING ANY MAXWELL CASH WITH BATEMAN-EICHLER. THIS WILL STABILIZE MAXWELL'S PRICE WHICH IS STILL FLUCTUATING BETWEEN THE BROKERAGE HOUSES BY AS MUCH AS 2 POINTS I.E. 6 VS 8. I FURTHER REMIND YOU THAT THE DIRECTOR'S LIABILITY DATES BACK TO LAST WEDNESDAY, OCTOBER 21ST 1987 AT A DOUBLE DIGIT PRICE I.E. \$11 TO \$12 ROUGHLY AND NOT THE CURRENT \$6 TO \$8 FIGURE. FINALLY, ALAN MUST CONTACT HIS PARTNER IN RORACK RAY O'ROURKE BUT THE \$143,000.00 MAXWELL STILL OWES RORACK.

SINCERELY
ATTY AL O'ROURKE

21:29 EST

MGMCOMP

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MIDDLETOWN, VA. 22645
27AM

Western Union Mailgram 2

4-035038S300002 10/27/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-27 0630P EST

RAYMOND O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 TDRN LA JOLLA CA 204 10-27 0630P EST
FON 6192795100

ALAN KOLB AND SEAN MALLOY RPT DLY MGM COPY MESSAGE
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123

DEAR ALAN AND SEAN

IN REGARD TO THE MAXWELL SHARE REPURCHASE, YOU HAVE NOT PLACED ANY ORDERS WITH THE LA JOLLA OFFICE OF BATEMAN EICHLER AND DAVE EVANS OF SUCH OFFICE. INSTEAD YOU HAVE PLACED YOUR ORDERS WITH GOLDMAN SACHS IN NEW YORK. THIS IS NOT SUFFICIENT BECAUSE OF THE OUTSTANDING MAXWELL PROBLEMS WITH SEVERAL CUSTOMERS IN LA JOLLA. BY TOMORROW MORNING THROUGH BATEMAN EICHLER IN LA JOLLA YOU MUST REPEAT MUST PURCHASE ENOUGH SHARES OF MAXWELL TO MAKE THE PRICE OF MAXWELL GO BACK UP ABOVE \$10 AT LEAST WHICH YOU PROMISED TO DO THROUGH CARL SAMUELIAN IN HIS TELEPHONE CONVERSATION WITH MISS MARY O'ROURKE AS OF LAST EVENING OCTOBER 26 1987. IF YOU DO NOT DO WHAT I AM TELLING YOU TO DO YOU ARE GOING TO TRIGGER YET ONE MORE PRICE COLLAPSE OF MAXWELL AND AS I HAVE TOLD YOU BEFORE BOTH YOU AND SEAN AND EVERY OTHER DIRECTOR AND OFFICER OF MAXWELL WILL BE HELD LIABLE FOR SUCH. FURTHER IT IS EXTREMELY OUTRAGEOUS THAT GOLDMAN SACHS HAVING CAUSED THESE PROBLEMS OVER THE LAST COUPLE OF YEARS BY CONSTANT SHORT SELLING OF MAXWELL IS NOW GIVEN THE BUSINESS FROM YOU. PLEASE CONTACT EITHER MYSELF OR CARL IMMEDIATELY ABOUT THIS MATTER.

SINCERELY,

ATTORNEY AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA, CA 92037
7949 LOWRY TERRACE
LA JOLLA CA 92037

18:27 EST

MGMCOMP

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29AM

Western Union Mailgram

4-026434S302002 10/29/87 ICS IPMRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-29 0408P EST

ATTORNEY AL O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 TDRN LA JOLLA CA 221 10-29 0408P EST
FON 6192795100
ALAN KOLB, SEAN MALOY, AND MONTE HAYES RPT DLY MGM COPY MESSAGE
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123

DEAR ALAN, MONTE, AND SEAN
I AM DEEPLY DISTURBED BY THE FAILURE OF YOUR MAN MR STAN ABRAHMS IN
THE LOS ANGELES OFFICE OF GOLDMAN-SACHS TO PURCHASE BACK ANY
SUBSTANTIAL NUMBER OF MAXWELL SHARES AS THE BOARD OF DIRECTORS
PROMISED TO DO. IN FACT THE LAST BID FROM GOLDMAN-SACHS AS OF THE
29TH OF OCTOBER ACTUALLY WAS A QUARTER POINT LOWER THAN THE BID ASKED
PRICE OF OTHER SAN DIEGO BROKERS. THIS HAS HAD THE UNSETTLING EFFECT
AS IS PERFECTLY OBVIOUS OF MAKING THE SAN DIEGO BROKERS BELIEVE THAT
THERE IS NO SHARE REPURCHASE PLAN UNDER WAY, AND THAT IN FACT THE
ENIIRE NEWS ANNOUNCEMENT WAS A COMPLETE HOAX. THEY ARE THEREFORE
BEGINNING TO LIQUIDATE THEIR POSITIONS WITH MAXWELL BEGINNING
TOMORROW FRIDAY THE 30TH AND NEXT WEEK AS WELL. I HAVE NEVER SEEN
SUCH BLATANT INCOMPETENCE OR DELIBERATE "SQUEEZING OUT" OR PRESSURE
TACTICS, AND I WOULD REMIND YOU THAT I INTEND TO FILE A 10-B5
SECURITIES ACTION AND SERVE SUCH UPON MR PETER SARCERDOTE, AND THE
OTHER MAXWELL BOARD OF DIRECTORS AND OFFICERS AT THE UPCOMING
DECEMBER 3 SHAREHOLDERS MEETING AT THE SAN DIEGO MARIOTT I REMIND YOU
FURTHER THAT SUCH WILL INCLUDE THE ORIGINAL LOSSES PENDING FROM
GOLDMAN-SACHS SHORTSELLING OF MAXWELL BEGINNING WITH THE MERGER OF
S-CUBED INTO MAXWELL BACK ON THE SPRING OF 1984.
SINCERELY

ATTORNEY AL O'ROURKE
7949 LOWRY TEPRACE
LA JCLLA CA 92037

16:11 EST

MGMCOMP

MIDDLETOWN SERVICE CENTER
MIDDLETOWN, VA. 22645
30PM



4-052009S303002 10/30/87 ICS IPHRNCZ CSP SDGB
1 6194597510 MGM TDRN LA JOLLA CA 10-30 0948P EST

RAYMOND O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGMB TDRN LA JOLLA CA 264 10-30 0948P EST
ZIP

MR SEAN MALOY
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR SEAN,

I DID NOT HEAR BACK FROM EITHER YOU, ALAN OR CARL ON FRIDAY SO I MUST THEREFORE INFORM YOU THAT YOU ARE UNDER A DUTY AS CHIEF FINANCIAL OFFICER OF MAXWELL TO TAKE PHYSICAL POSSESSION OF THE RORACK FILES IN ALAN KOLB'S POSSESSION IN THE FRONT OFFICE. THESE RECORDS REFLECT NUMEROUS SHAREHOLDER ISSUES AS YOU ARE WELL AWARE AND EVEN DETAIL THE BASIS FOR ALLEGATIONS OF IMPROPER CAMPAIGN DONATIONS TO THE 1982 AND 1986 GOVERNOR DEUKMEJIAN CAMPAIGN REFLECTED BY THE SALE OF MAXWELL SHARES DURING THE S-CUBED MERGER IN 1983 AND 1984. I WOULD STRONGLY ADVISE YOU TO OBTAIN INDEPENDENT COUNSEL ADVICE ABOUT YOUR POSITION. ANY CLAIMS ON YOUR PART OF "CLEAR CONSCIENCE" OR GOOD FAITH ARE NOT A DEFENSE TO SECURITIES FRAUD AND IMPROPER CAMPAIGN DONATIONS AS A LAWYER WILL TELL YOU. I WILL ASSURE YOU THAT AT THE SHAREHOLDERS MEETING NUMEROUS LAWSUITS WILL BE FILED BY SUCH TIME AND SERVED UPON THE VARIOUS OFFICERS AND DIRECTORS OF MAXWELL. FURTHERMORE, THE POSITION OF GOLDMAN-SACHS LIQUIDATING MAXWELL SHARES IN AN ATTEMPT TO STIFLE RAY O'ROURKE OR MYSELF IS ONLY GOING TO LEAD TO SEVERE REPERCUSSIONS AGAINST ANY PARTY WHO HAD KNOWLEDGE OF SUCH EVEN IF SUCH PARTY OBJECTED BUT DID NOT INFORM RAY AND I. I AM WELL AWARE OF WHAT IS OCCURRING IN NEW YORK BETWEEN GOLDMAN-SACHS AND BATEMAN-RICHLER AS I HAVE BEEN INFORMED BY BROKERS OF SUCH OFFICES. YOU WILL PLEASE REPLY BY MONDAY THAT YOU HAVE IN FACT IMPLEMENTED THE REQUESTED ACTION.

SINCERELY,

ATTORNEY AL O'ROURKE

21:49 EST

MGMCOMP

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
01AM

Western
Union Mailgram

4-007551S305002 11/01/87 ICS IPMTZZ CSP SDGB
1 6194597510 MGM TDMT LA JOLLA CA 11-01 0323P EST

RAYMOND C O'ROURKE
7949 LGWRY TEPTRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGMB TDMT LA JOLLA CA 169 11-01 0323P EST
ZIP
ALAN KOLB AND SEAN MALOY
MAXWELL LABORATORIES
8888 BALBOA AVE
SAN DIEGO CA 92123
DEAR SEAN AND ALAN

I HAVE JUST RECEIVED THE MAXWELL ANNUAL SHAREHOLDERS REPORT. IT'S MANIFESTLY ABSURD DESCRIPTION OF GOLDMAN - SACHS AS MAXWELL MARKET SPECIALIST IS HEREBY CHALLENGED UNDER THE PROXY PROVISIONS OF U S SECURITIES LAWS. AS YOU KNOW YOU HAVE NOT INFORMED A SINGLE SHAREHOLDER ABOUT GOLDMAN - SACHS' POSITION IN THE RECENT MAXWELL STOCK COLLAPSE. YOU MUST CORRECT THIS NOW TO THE SHAREHOLDERS OR I WILL DO SO USING THE 1984 SHAREHOLDERS LIST WHICH WILL AT LEAST REACH 1/2 UP SO OF THE CURRENT MAXWELL SHAREHOLDERS. I SIMPLY CANNOT UNDERSTAND YOUR ACTIONS WHICH ARE IN FLAGRANT VIOLATION OF APPLICABLE PROXY SOLICITATION RULES I.E. YOU ARE NOT INFORMING THE SHAREHOLDERS THAT YOU ARE REQUESTING THAT THEY APPROVE THROUGH THEIR PROXY THE UNLAWFUL ACTIONS OF GOLDMAN - SACHS OF LAST WEEK. I WOULD REMIND YOU BOTH OF THE CRIMINAL PENALTIES APPLICABLE IN THIS MATTER AND SUGGEST YOU CONSULT INDEPENDENT COUNSEL

SINCERELY
ATTORNEY AL O'ROURKE

15:24 EST

MGMCMF

is in sending Maxwell's stock price even lower, so that they can cover all the "short-sales" both they and their Clients have been making over the last three years on Maxwell stock.

The analogy of inviting the wolf into the chicken house can only come to mind, with the continued presence of Peter Sacerdote and Goldman Sachs on Maxwell's Board. Further, the Attorney who should be screaming bloody-murder on your behalf, Mr. Karl Samuelian, Esq., chooses not to do so because of his friendship with Mr. Peter Sacerdote, Goldman Sachs, and Security Pacific National Bank, the largest Client of Goldman Sachs'.

3. As you will see from the enclosed Telegram Copies, it is only because of my intervention that a Maxwell Shareholders' Repurchase Plan was initiated after an arrogant, fraudulent, unlawful battle between the Maxwell Board of Directors and myself. Had this not been done, your stock would now be around \$2 to \$3 per share when its book value is more like \$15 per share. I would hope that you would agree that this is an absurd situation. Furthermore, there are even several San Diego Companies interested in buying Maxwell Laboratories Inc. at a price of over \$20 per share, i.e., book value plus premium. Further still, while no one has yet informed you of such, each Maxwell Shareholder dating back from 1983, i.e., at the time of the Merger of Systems, Science, and Software into Maxwell Laboratories Inc. has a vested Right to \$21.25 plus interest due to the Shareholder's Dissenter Rights not being explained to you.

I hope to see you at the Maxwell Shareholders' Annual Meeting. Any questions from you or your legal advisers will be responded to by me promptly.

Sincerely,


Attorney Al O'Rourke

AO:b

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
20PM

Western Union Mailgram

4-0227418293-011 10/20/87 ICS SOTSCT3 SDGB
SUSPECTED DUPLICATE: 4-040969S293002 ICS IPMRNCZ CSP
1 6194597510 MGM TDRN LA JOLLA CA 10-20 0653P EST

▶ RAYMOND C O'ROURKE
7949 LOWRY TERRACE
LA JOLLA CA 92037

THIS IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

6194597510 MGMB TDRN LA JOLLA CA 167 10-20 0653P EST
ZIP
DR ALAN KOLB
MAXWELL LABORATORIES
8868 BALBOA AVE
SAN DIEGO CA 92123
DEAR ALAN,

IN REGARD TO THE MAXWELL BOARD OF DIRECTORS MEETING ON OCTOBER 21,
1987 AT LOS ANGELES AIRPORT HILTON HOTEL, PLEASE BE ADVISED THAT I
HAVE INFORMED KARL SAMUELIAN AS FOLLOWS:

1. NEITHER YOUR PARTNER IN RORACK, DR. RAYMOND O'ROURKE OR ANY OTHER
MAXWELL SHAREHOLDER NEEDS TO TOLERATE THE NEGLIGENCE OF THE MAXWELL
BOARD OF DIRECTORS IN NOT PURCHASING MAXWELL SHARES ON THE OPEN
MARKET TO STABILIZE THE STOCK PRICE OF MAXWELL. THIS IS BEING DONE BY
MANY OTHER COMPANIES AS I SPEAK TO YOU AND BOTH YOU AND THE BOARD
MUST DO THE SAME TO PREVENT A TOTAL MAXWELL COLLAPSE.

2. KARL SAID THAT HE WOULD RELAY THIS MESSAGE TO YOU VERBALLY BUT YOU
SHOULD BE MADE AWARE OF THE FACT THAT YOUR ACTIONS IN THIS CRITICAL
TIME PERIOD FOR MAXWELL WILL BE DETERMINATIVE OF SHAREHOLDER LAWSUITS
OR THE ABSENCE OF SUCH. I AM SPECIFICALLY REFERRING TO THE S-CUBED
SITUATION.

ATTORNEY AL O'ROURKE

22:04 EST

MGMCOMF

Exhibit
(h)

Oct. 18, 1983

Dr. Alan Kolb
Chairman of the Board
Maxwell Laboratories, Inc.
8835 Balboa Ave.
San Diego, Ca.

Dear Alan:

I have been informed about the pending acquisition of S-Cubed by Maxwell, which as you know, is intended to serve no other purpose than to cover up the ties between Frank Clark, Parker Milliken, Clark & O'Hara, S-Cubed, and Maxwell, the subject of your own (loop letter) to Computrad of which Frank Clark was such an inherent factor through the Lincoln Wood Fund. I must insist that you make known to both Maxwell's shareholders and S-Cubed's shareholders the full basis of Korack's complaints about Maxwell, it's officers and directors, inter-locking with S-Cubed through Parker Milliken, Clark & O'Hara (i.e. Karl Samuelian and Frank Clark) and the facts surrounding Frank Clark's resignation from the Maxwell Board of Directors due to the conflict of interests with S-Cubed. Specifically, as has been repeated to you on several occasions, it is Korack and Dr. O'Rourke's position that all technically correct physics was thrown into a corporate trash can when Frank Clark left Maxwell and left Karl and yourself in charge to manipulate both U.S. defense contracts and third parties (i.e., the acquisition of Maxwell shares by Bendix Laboratories and the precipitator project disaster.)

I again presume that you will totally disregard this letter as you have so many others in the past. Nevertheless, it shall be on file for the inspection of Maxwell and S-Cubed shareholders during the merger period. I also intend to have the full range of your German connections thoroughly exposed and made known to such parties.

Sincerely,

Al O'Rourke

AO:j

Exhibit
(i)

The Litigation Section of the State Bar

Presents a Dinner Program



Lawyer Liability

A practical, common sense and informative discussion of how to avoid legal and ethical liability in the practice of law.

Thursday, November 10, 1988 – San Diego

San Diego Marriott Hotel
333 West Harbor Drive

6:00 p.m. No Host Cocktails
7:00 p.m. Dinner and Program

Moderator: Mark C. Mazarella, Esq., Luce, Forward, Hamilton & Scripps

Panelists:

The Honorable Arthur W. Jones
San Diego Superior Court Judge

Charles H. Dick, Esq.
Baker & McKenzie

Robert C. Fellmeth, Esq.
State Bar Discipline Monitor

William S. Lerach, Esq.
Milberg, Weiss, Bershad, Specthrie & Lerach

Philip D. Kopp, Esq.
Luce, Forward, Hamilton & Scripps

Lawyer liability is on the increase! Join our distinguished panel for an informative discussion, including:

- Risk prevention and management to avoid malpractice claims
- How to minimize the risk of your liability for your client's acts
- Preventing liability for malicious prosecution, abuse of process and sanctions
- Reducing the risk of liability in securities, corporate and other business representation
- Major changes in the attorney discipline system

Registration Form – "Lawyer Liability": November 10, 1988, San Diego

Please check one of the following:

- \$30 Section Members \$35 Non-Section Members

Please send this form and your check, no later than November 7, 1988, to:
Janet K. Carver,
Litigation Section,
State Bar of California,
555 Franklin Street,
San Francisco, CA 94102

NAME _____

ORGANIZATION/FIRM _____

SUITE/ADDRESS _____

CITY _____ **STATE** _____ **ZIP** _____

Enclosed is my check for \$ ____ made payable to the "State Bar Litigation Section". No refunds will be given for this seminar after November 7, 1988. All refund requests must be made in writing. For further information, please call Janet K. Carver at (415) 561-8341.

Exhibit (3)

SAN Diego Union
June 12, 1988

Maxwell's rail gun big news — if small

By S. Lynne Walker
Staff Writer

Maxwell Laboratories Inc. has made it big — but then again, that's part of the problem.

"The idea is to make it small," said Monson Hayes Jr., Maxwell's president and chief operating officer.

It is Maxwell's second-generation electromagnetic rail gun being developed as an armor-piercing weapon that can be mounted on tanks. If Maxwell succeeds in shrinking the gun and its power system to a practical size, "it could revolutionize gun technology," Hayes said.

The principle could be applied not only to state-of-the-art weapons such as the rail gun but to field artillery as well. "With electricity, we could fire howitzers twice as far," Hayes said.

The San Diego-based company's electromagnetic rail gun has come a long way since it was first conceived as a space-based device for the Strategic Defense Initiative, or "Star Wars" program.

The gun, which is 15 times more powerful than its predecessor, uses electromagnetic fields to propel bullets along the rail-like barrel at 6,000

"The best-performing gun in use today fires bullets with a velocity of 3,000 mph," said Mike Holland, manager of Maxwell's kinetic energy technology program. "We're already well ahead of that."

However, more than 600 electricity-storing capacitors weighing 330 pounds apiece are needed to generate enough electricity to fire a single shot from the rail gun.

"This one would not work on a tank," Hayes said, patting the gun's still-warm barrel. "Weight is definitely an issue."

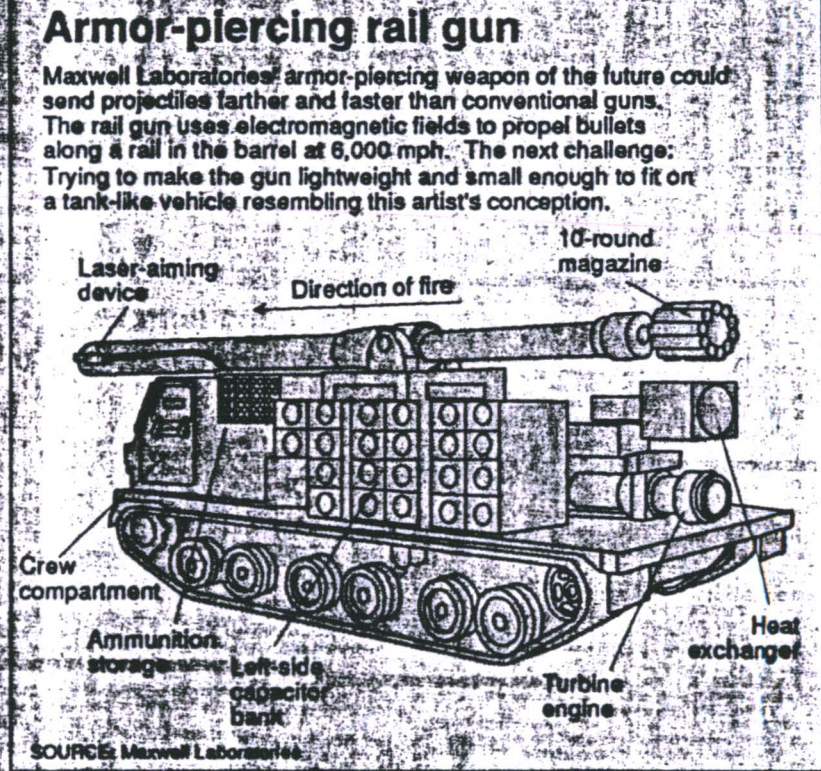
Critics say the rail gun and its support system are too large to be mobile.

"They'll certainly be able to get it smaller, but I think you'll still be looking at a convoy," said John Pike, associate director of space policy for the Federation of American Scientists.

"You're obviously can't fire that thing on the move," Pike said. "You're going to have to dig in, because that gun has a pretty ferocious recoil."

But military representatives say rail-gun technology is advancing so quickly that "the applications in the tactical realm are close at hand."

"Maxwell has shown that it can be



The San Diego Union/Mike Cronan

have to have an auxiliary generator on board to be the prime source of power," said Huebschman.

However, less space will be required on board the tank for the rail gun's barrel and ammunition than

they produce less velocity, so the size of the ammunition is larger.

In response to the need for smaller power packs, Maxwell has research under way to miniaturize capacitors for use on weight-sensitive vehicles such as tanks and spacecraft.

sight weapon, Pike says its effectiveness will be limited to short-range targets.

"If you're going with a short-range weapon, why not go with a rocket?" asked Pike. "What is this going to do that a rocket launcher or some other conventional weapon can't do?"

Holland said the rail gun is being designed to destroy a tank up to three miles away.

While that is considered a short-range weapon, "it would reach farther than anything we have today," he said. "Typically, wars have been fought at a little over a mile range."

Maxwell developed the gun under a \$9 million contract with the Defense Nuclear Agency. Although the rail gun is envisioned as a weapon suitable for a tank, its first mission when the contract is completed December is to test the strength of armor against the bullets.

In addition to the rail gun's potential as an anti-armor weapon, "the talk of theater defense using ground-based electromagnetic rail gun," said Huebschman.

The rail gun may also "fit into follow-on (SDF) architecture," said. "It might be a player, so we're pursuing some of the advanced technologies."

Maxwell ultimately hopes to build a rail-gun system that resembles a tank and is capable of firing thousands of rounds per minute for up to

of 3,000

(3)

Unlike conventional ammunition, the rail gun's bullets are lightweight plastic objects in a variety of shapes and sizes. Bullets pushed down the gun's 24-foot barrel by 2.6 million amps of electrical current have the impact of 2 1/2 million pounds when they hit their target.

Huebschman, who is assigned to SDI's innovative science and technical directorate. "The next thing that has to be done is to make the technology usable, reliable and capable of fitting on a tank chassis."

said, adding, "If you replace the rounds the tank currently carries with 110 projectiles, you'll have more space for capacitors."

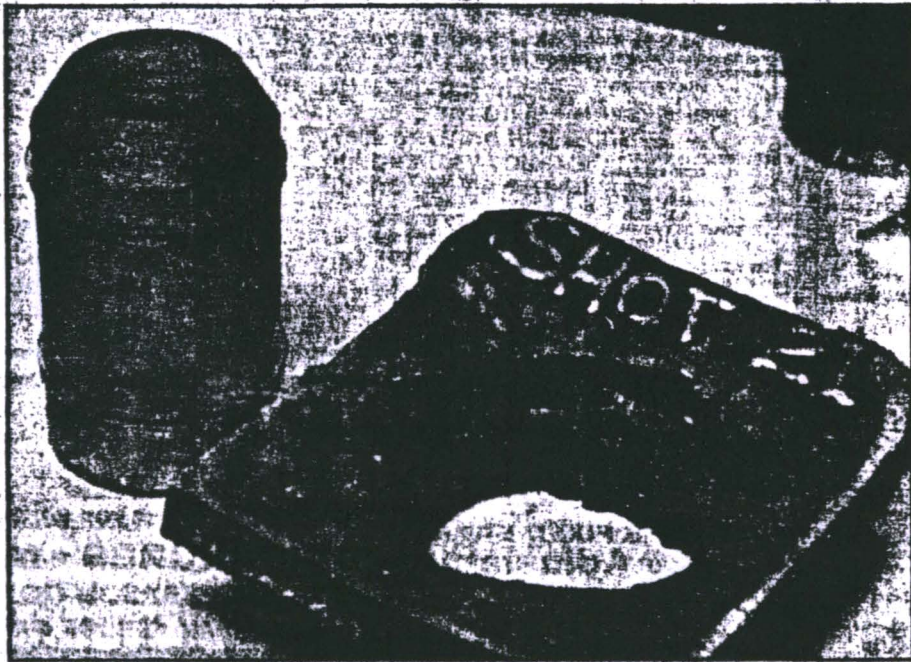
While conventional tanks fire with the same amount of kinetic energy,

man said. "The time frame is a function of how much research and development funds you want to spend on it."

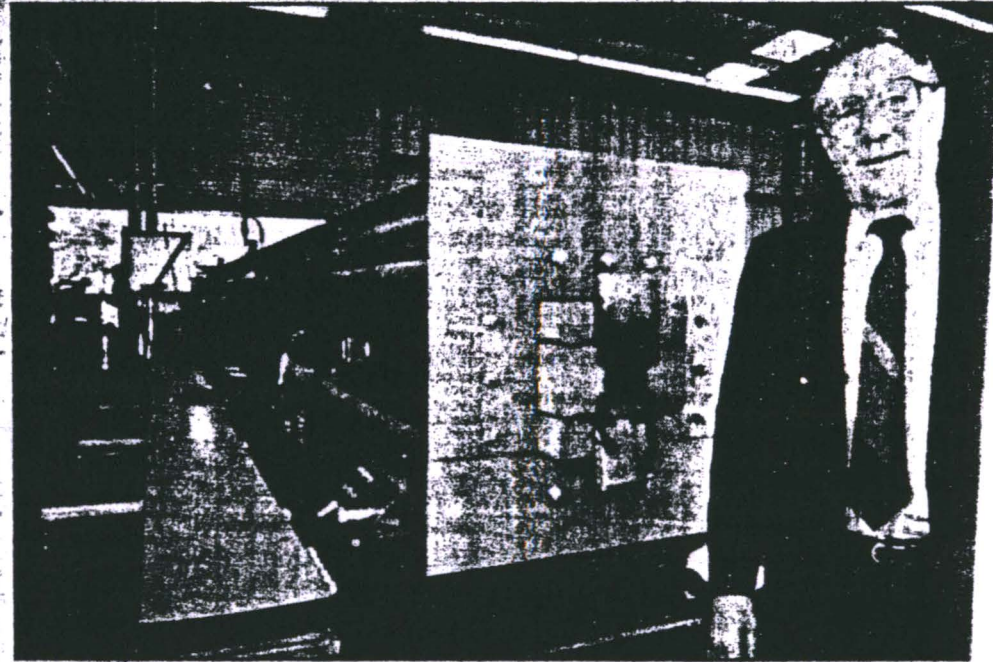
Because the rail gun is a line-of-

said Hayes.

"We strongly believe in it," he said. "The main when."



Rail gun developed by Maxwell Laboratories uses plastic bullets. Such bullets hit target with impact of 2.5 million pounds.



Maxwell President Monson Hayes Jr. says research is under way to make the

company's electromagnet behind him smaller and mo

The San Diego Un

government - It's all earned and deserved," said Allen Center, a San Diegan who is co-author of a widely

out which PR tools are going to work best."

After years in newspapering followed by both corporate and agency

Hotel, proposed to promote its client. The filing generated a story headlined "How Gail Stoorza Misled and Manipulated the Press" in the San Diego Daily Transcript, a legal and fi-

public interest clients. In 1982, SZ&M counseled Christopher D. Sickels, the developer who renovated the downtown landmark U.S. Grant Hotel and who sought an urban devel-

See PR on Page I-7

omy

(K)

Section E

General Atomics recommended for weapons project

By Dori Meinert, Copley News Service

WASHINGTON — Energy Secretary John Herrington yesterday gave a boost to General Atomics of La Jolla when he recommended a two-reactor strategy for producing raw materials for atomic weapons.

In taking a two-prong approach, Herrington accepted a new technology for an "inherently safe" nuclear reactor developed by General Atomics that virtually assures the La Jolla firm a role in the construction of a \$2 billion test reactor in Idaho.

Herrington recommended that a high temperature, gas-cooled reactor of the type developed by General Atomics be built at the Idaho National Engineering Laboratory in Idaho Falls. The project could create more than 350 new jobs at General Atomics, which currently employs 1,300, a company spokesman said.

Herrington also recommended that a "state-of-the-art" heavy-water reactor be built at the Department of Energy's Savannah River complex near Aiken, S.C.

While the Energy Department still must advertise for bids on the projects, General Atomics is considered the front-runner in development of the gas-cooled reactor. The Modular High Temperature Gas-Cooled Reactor has been in design for over four years as part of a joint DOE-industry program.

General Atomics built the only working commercial gas-cooled reactor in the United States, the Fort St. Vrain plant of Colorado Public Service Co. in Denver.

Herrington's announcement yesterday also should help the company's attempts to market the reactor overseas. A Soviet delegation visited the La Jolla firm in April as part of a U.S.-Soviet agreement to discuss the peaceful use of nuclear power. China also has had strong interest in the reactor and the Los Angeles metropolitan water district is considering it for power production and desalination.

Judge blocks cuts, layoffs at Eastern

Associated Press

WASHINGTON — A federal judge yesterday temporarily blocked Eastern Airlines' plans to dramatically curtail service and lay off 4,000 workers, heeding complaints from the carrier's unions that the cutbacks would violate federal labor laws.

U.S. District Judge Barrington D. Parker tentatively scheduled a hearing for today to determine if his temporary restraining order should be extended beyond its 10-day period.

Eastern had planned to cut its service by about 12 percent as of Aug. 31, leaving it basically serving the country's East Coast and Latin America. Its work force also would have been reduced by 12 percent.

But after a 3 1/2-hour hearing, Parker decided that "a sufficient threat of injury to the unions ... exists, which in the judgment of this court warrants issuance of the temporary restraining order."

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9.84	ML	+	01	Asian	9.83	ML	+	01
9.85	ML	+	01	Asian	9.83	ML	+	01
16.44	ML	+	01	Asian	9.83	ML	+	01
10.97	11.73	01	Asian	9.83	ML	+	01	
9.50	10.16	02	Asian	9.83	ML	+	01	
11.81	12.43	01	Asian	9.83	ML	+	01	
12.83	12.87	01	Asian	9.83	ML	+	01	
7.75	8.29	01	Asian	9.83	ML	+	01	
6.21	6.44	01	Asian	9.83	ML	+	01	
6.73	7.26	01	Asian	9.83	ML	+	01	
20.87	ML	+	01	Asian	9.83	ML	+	01
8.02	ML	+	01	Asian	9.83	ML	+	01
23.32	ML	+	01	Asian	9.83	ML	+	01
18.41	ML	+	01	Asian	9.83	ML	+	01
3.77	ML	+	01	Asian	9.83	ML	+	01
11.22	ML	+	01	Asian	9.83	ML	+	01
8.62	ML	+	01	Asian	9.83	ML	+	01
18.45	ML	+	01	Asian	9.83	ML	+	01
12.35	ML	+	01	Asian	9.83	ML	+	01
10.41	ML	+	01	Asian	9.83	ML	+	01
13.58	14.11	01	Asian	9.83	ML	+	01	
9.27	9.44	01	Asian	9.83	ML	+	01	
9.03	9.21	01	Asian	9.83	ML	+	01	
9.73	9.51	01	Asian	9.83	ML	+	01	
8.51	8.84	01	Asian	9.83	ML	+	01	
8.98	9.35	01	Asian	9.83	ML	+	01	
9.18	9.48	01	Asian	9.83	ML	+	01	
10.78	11.28	01	Asian	9.83	ML	+	01	
11.81	12.81	01	Asian	9.83	ML	+	01	
20.84	22.78	01	Asian	9.83	ML	+	01	
9.94	10.44	01	Asian	9.83	ML	+	01	
12.18	13.81	01	Asian	9.83	ML	+	01	
20.44	22.34	01	Asian	9.83	ML	+	01	
8.91	9.30	01	Asian	9.83	ML	+	01	
12.44	14.11	01	Asian	9.83	ML	+	01	
23.85	26.87	01	Asian	9.83	ML	+	01	
12.87	14.87	01	Asian	9.83	ML	+	01	
12.92	17.87	01	Asian	9.83	ML	+	01	
11.43	12.43	01	Asian	9.83	ML	+	01	
14.18	15.37	01	Asian	9.83	ML	+	01	
17.55	18.43	01	Asian	9.83	ML	+	01	
8.28	8.99	01	Asian	9.83	ML	+	01	
71.95	23.99	01	Asian	9.83	ML	+	01	
12.44	13.46	01	Asian	9.83	ML	+	01	
17.83	18.41	01	Asian	9.83	ML	+	01	
15.98	16.69	01	Asian	9.83	ML	+	01	
9.22	9.46	01	Asian	9.83	ML	+	01	
15.24	16.48	01	Asian	9.83	ML	+	01	
6.58	6.89	01	Asian	9.83	ML	+	01	
9.53	10.31	01	Asian	9.83	ML	+	01	
16.74	17.33	01	Asian	9.83	ML	+	01	
13.58	14.22	01	Asian	9.83	ML	+	01	
12.44	14.88	01	Asian	9.83	ML	+	01	
14.73	15.43	01	Asian	9.83	ML	+	01	
9.92	9.92	01	Asian	9.83	ML	+	01	
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WASHINGTON

United Press

Exhibit (L1)

This was around 1981-1982?

Mr. Patrick Sexton was a good friend
of the "Gipper" and a former NFL quarterback.

The Capt. came to Patrick Sexton
via Dr. Ray O'Rourke
Mary O'Rourke
who took care of Mr. Sexton
(an Alzheimer patient)



Patrick Sexton

Nancy and I are happy to send our congratulations
for your birthday. We hope your special day is filled
with warmth and celebration and that you enjoy much
happiness in the year to come.

Ronald Reagan

Exhibit (L2)

THE WHITE HOUSE
WASHINGTON

January 8, 1988

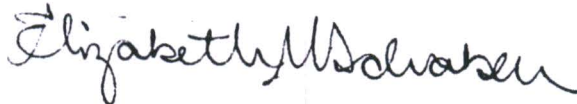
Dear Mrs. O'Rourke:

On behalf of Mrs. Reagan, thank you for taking the time to write, and for giving her the benefit of your thoughts. She has asked that I respond to you to express her gratitude.

Mrs. Reagan is always glad to receive letters like yours, and truly appreciates your support.

With warm best wishes,

Sincerely,



Elizabeth M. Schaben
Correspondence Secretary
to the First Lady

Mrs. Mary O'Rourke
7949 Lowry Terrace
LaJolla, CA 92037

Exhibit (L3)

THE WHITE HOUSE
WASHINGTON

Thank you for your thoughtfulness in a difficult time for me. I was very touched by your concern and kind words of support. The President joins me in sending you our deep appreciation and best wishes.

Sincerely,

Wally Reagan

THE WHITE HOUSE
WASHINGTON



*Ms. Mary O'Rourke
7949 Lowry Terrace
La Jolla, California
92037*

Exhibit (L3)

United States Senate

WASHINGTON, D.C. 20510

August 26, 1986

Ms. Mary O'Rourke
7949 Lowry Terrace
La Jolla, California 92037

Dear Ms. O'Rourke:

When we suffer a great loss, or are asked to bear a heavy burden, we cannot do it alone. It is the kind and compassionate consideration of our good friends, whose thoughts and prayers give us strength and inspiration, that help us carry on.

That is why your letter meant so much to me, and why I express, in behalf of my entire family, our heartfelt appreciation for thinking of us, and for your continuing friendship.

Sincerely,


Edward M. Kennedy

EMK/lhg

International Totalizator, which makes ticket dispensing machines for the wagering industry called totalizators (such as lottery ticket machines), hit \$4.54 on Aug. 25, \$3.88 on Oct. 19, \$2.50 on Feb. 5 and March 3.

Moving just before the crash, Personal Computer Products director and market maker Edward Savarese on Oct. 9 sold on the open market from his own account 16,884 common at \$9.88. He still directly held 298,448 in, directly 8,400 and 362,332 in his market maker holdings.

The stock closed at \$11 on Aug. 25 and Oct. 16. It hit \$10.75 on Oct. 19 then fell to \$4.88 by Feb. 5 and had crept up to \$5 on March 3.

Breaking his long habit of selling several thousand shares each month, apparently for income, shareholder Mehan Kasam didn't report any sales for October. His direct holding had dropped from 182,385 on Aug. 12 to 1 on Sept. 24, with his indirect holding undisclosed at that time.

Continuing to sell parts of his Price Co. holding, lawyer and director Paul Peterson on Oct. 28 disposed of by gift 3,000 common, price undisclosed. Then on Nov. 10 he sold on the open market 5,000 at \$30. That left him 177,280 in his direct holding, 127,430 in his indirect.

Voltek (Price Co.) traded OTC, closed Aug. 25 at \$60.75. It crashed to \$36.25 by Oct. 16 and went down to \$25 on Oct. 19 to \$32. Often swinging \$1 per day, it had risen to \$39 by Feb. 19 and \$39.25 on March 3.

Smith Labs director Thomas J. Cable between Oct. 26 and 30 bought on the open market 19,100 common at between \$2.31 and \$2.10.

He reports that his direct holding then totaled 1 share while his indirect carried 835,860.

The stock has since dropped in value. Smith Labs, traded OTC, closed Oct. 16 at \$2.438, Oct. 19 at \$2.113, Feb. 18 at \$1.625 and March 3 at \$1.75.

ICI Corp. director Robert P. Sherer on Nov. 16 bought on the

reported.

Chairman and CEO Sidney Fox on Oct. 28 bought on the open market 2,500 common at \$2.63 for indirect holdings of 58,145 and direct of 68,352. Fox picked up 3,000 this summer.

Director Howard Levenson on Oct. 28 bought on the open market 2,500 at \$2.83, giving him 10,082 indirectly held and 1,500 directly.

Southwest traded on the American Stock Exchange on Aug. 25 at \$3.84, Oct. 16 at \$3.50, on Oct. 19 at \$3.25, on Feb. 5 at \$2.75 and on March 3 at \$2.75.

Arendette, for example, therefore lost \$1 per share in value, or \$9,100, on the 9,100 he bought.

PS GROUP executive Paul Barkley on Oct. 22 bought on the open market 2,000 common at \$24. On Oct. 29 he bought another 1,000 more at \$21. He then directly held 11,000.

PS GROUP traded on NYSE, closed Aug. 25 at \$33.38, Oct. 16 down \$1.25 to \$31, Oct. 19 down \$3.75 to \$27.25, Feb. 25 up 13 cents to \$27.38 and March 3 up 25 cents to \$27.375.

Barkley therefore bought the shares low and has watched them rise by either \$3.575 or \$6.375.

Cipher Data Products officer Donald R. Lundell on Oct. 28 bought on the open market 1,000 common at \$6.13. That gave him 1,800 directly held, 12 indirectly.

Officer Robert Pfeiffer, on Oct. 29 exercised options for 750 common, price undisclosed, giving him 7,736 directly owned.

Lundell's purchase looks profitable. Cipher closed Aug. 25 at \$10.12, Oct. 16 at \$8.63, Oct. 19 at \$7.38, Feb. 18 at \$7.125 and March 3 at \$8.125. Thus, the 1,000 shares he bought have increased in value by \$1,000.

Computer & Communications Technology Corp. officer Robert Mollerstuen on Sept. 4 declared initial direct ownership of 45,140 common, price undisclosed.

CCT, traded OTC, closed Oct. 16 down \$2.18 to \$8.50, Oct. 19 down \$1.38 to \$7.125, Feb. 18 even at \$6.125 and March 3 down 15 cents to \$6.875.

Imperial Corp. of America President and CEO Ken Thygeson in October, right through the crash, continued his steady investment in the savings and loan company.

On Oct. 8 he acquired in an unidentified way 1,000 common at \$18. Then on Oct. 7, 21, 27 and 28 he bought on the open market 11,000, 12,000, 300 and 25, respectively, at \$14.25, \$11.50 and \$9.45. He then directly held 30,186.

ICA, traded on NYSE, closed Aug. 25 at \$14.12, then fell to \$12.38 on Oct. 16, \$11.50 on Oct. 19, \$11.75 on Feb. 5 and \$11.50 on March 3.

ICA director John W. Kenney on Nov. 3 bought on the open market 3,000 common at \$10.18. He then indirectly held 5,000 and 1,000 directly.

And ICA officer Gary Palmer on Oct. 28 bought on the open market 3,000 common at \$9.75. Palmer then held 2,432 directly and 189 indirectly.

Ever-active Maxwell Labs market maker and director Peter M. Sacerdote, on Nov. 27, sold on the open market 22,300 at \$2.75 and on Dec. 7 bought 21,615 at \$9.53, a profitable pair of trades.

He then held 1,897 common in his market maker account, 9,068 in his direct holding and 210 in his indirect.

Director Lewis J. Colby Jr. on Oct. 28 bought on the open market 1,500 at \$8.75, giving him 1,500 directly held.

Maxwell Labs closed Aug. 25 at \$14.25, Oct. 16 at \$13, Oct. 19 at \$11.75, Feb. 25 at \$10 and March 3 at \$10.50.

Four Mission West Properties principals bought small allotments of common on the open market in October, November and December.

George Joseph Labrosche Jr. between Nov. 2 and 18 bought 544 common at between \$8.75 and \$7.75, giving him 35,920 directly held, 4,154 indirectly.

William Nelson between Oct. 18 and Nov. 13 bought 537 at between \$9.50 and \$6.75, giving him 3,100 direct, 26,257 indirect.

Red 5600 between Oct. 1 and Nov. 18 bought 537 at the same

PARKER, MILLIKEN, KOHLMEIER, CLARK & O'HARA
ATTORNEYS AT LAW
TWENTY-FOURTH FLOOR
606 SOUTH OLIVE STREET
LOS ANGELES, CALIFORNIA 90014
TELEPHONE (213) 624-1451

CLAUDE I. PARKER
1871-1952

JOHN B. MILLIKEN
RALPH KOHLMEIER
HARRISON HARKINS
FRANK W. CLARK, JR.
WALTER R. HILKER, JR.
JOHN F. O'HARA
WILLIAM P. CAMUSI
STANLEY L. BAUER
LAVERNE M. SAGMASTER
W. DICKERSON MILLIKEN
R. F. WADE
MARK TOWNSEND
N. MATTHEW GROSSMAN
KARL M. SAMUELIAN
ANTHONY T. OLIVER, JR.
FLOYD M. LEWIS
EVERETT F. MEINERS
RICHARD A. CLARK
FRANKLIN TOM
G. MORGAN FITZWATER, JR.

June 2, 1970

Exhibit
(N)

C
Ralph M. Pray III, Esq.
Gray, Cary, Ames & Frye
2100 Union Bank Building
San Diego, California 92101

Re: Walter Crewson

Dear Mr. Pray:

O
Pursuant to your request, I am forwarding to you herewith the original Promissory Note as well as the original Pledge Agreement signed by Mr. Crewson, which you are authorized to void.

Very truly yours,

KMS

Karl M. Samuelian

P
KMS:ir
Enclosures

cc. Rorack Co. ↙

Y

Exhibit
(0)

Albert O. O'Rourke

Attorney at Law

7949 Lowry Ter., La Jolla, Calif. 92037
(619) 459-7510

October 6, 1988

Mr. Michael Alpert, Esq.
Gibson, Dunn, and Crutcher
600 B Street
San Diego, Cal. 92101

Dear Mr. Alpert:

I have not heard back a response from your Client, Mr. Clifford V. Brokaw III and IRT Corporation in regard to the enclosed letter to Dr. Alan Kolb of Maxwell. I assume you know that Maxwell is in a \$30,000,000 Default in regard to Case No. 598861, San Diego Superior Court and cannot complete this purchase of IRT's assets in any event.

Furthermore, a Constructive Trust is being placed upon Maxwell's assets and the resignation of its entire Board of Directors (except Dr. Alan Kolb) is to be made at the Maxwell Shareholders Meeting in December (?), 1988.

There could perhaps be a "Stock swap", acquisition, or merger of IRT by Maxwell, bringing some or all of IRT's personnel over to Maxwell, if they desire such.

At the present time, IRT's stock is essentially worthless (i.e., around \$.50 to \$.75). Maxwell's stock not only has its quoted \$11.75 value, but something like \$10. per share more due to liability of the underwriters Goldman, Sachs and Maxwell's law-firm Parker, Milliken, Clark, O'Hara and Samuelian for violations of Section 10 B 5 of the 1934 Securities Exchange Act and CCP, Section 340.6 (Attorneys' Concealment). Such price reflects the \$21.25 former price of Maxwell stock before the S-Cubed merger in 1984, which caused Maxwell's price decline. The IRT situation is essentially the same, i.e., a Company in near bankruptcy, being acquired or selling major parts of its assets.

Both for your protection (Lantham and Watkins, the Attorneys who represented S-Cubed are arguably also liable under CCP, Section 340.6), I bring these matters up to you and your IRT Clients. This is to say that any exchange between IRT and Maxwell must be absolutely and unequivocally "arms length", since such was not the case in the S-Cubed merger. Please inform me of your Clients' intentions.

Sincerely,


Attorney Al O'Rourke

AO:m

CC - Alan Kolb, RORACK, Maxwell Laboratories Inc.

Albert O. O'Rourke

Attorney at Law

7949 Lowry Terrace • La Jolla, California 92037 • (714) 459-7510

October 23, 1981

Exhibit
(P)

Dr. Alan Kolb
Rorack
c/o Maxwell Laboratories, Inc.
8835 Balboa Avenue
San Diego, California 92144

Re: "Rorack Internal Memorandum"

Dear Alan:

Dad received your short note to him regarding his intention to sell the 13,500 shares of Maxwell stock irrevocably transferred to Rorack by you. Apparently you did not quite understand his intentions, which are to sell up to 13,500 shares if a suitable price so permits such a sale. The 6,750 share-"half" at your end would "roughly" cover your earlier sale of Optical Radiation stock (approximately 4,000 shares at its current price of \$17-18 per share). The purpose for reinvesting the entire sum so obtained in Computrad would be to benefit the Rorack partnership.

1. In connection with the Rorack partnership, it should be noted that had Dr. O'Rourke agreed to Karl Samuelian's earlier, and often repeated, suggestion of selling Maxwell stock back to Maxwell, a "book-value" price of \$4.00 would have resulted. Therefore, Dr. O'Rourke's "stubbornness" has resulted in a gain of nearly \$74,000 to the Rorack partnership. It seems ludicrous to fault him for such a proper "business decision," but you apparently do so fault him and wish to sever your business relations with him.
2. Furthermore, two of the companies held by Rorack are NOT total "write-offs" but should result in substantial cash returns for Rorack.

These are a) Computrad, which is, indeed, now "technically successful," and b) Insect Management Services (IMS), the "company goods" of which were, of course, liquidated by First Western Financial Corp., but whose patents, product designs, customer lists, intangibles, etc. remain capable of purchase out of the U.S. Bankruptcy Court. I am informed that the reason no such action has yet occurred is that the judge of

(Cont.)

the Bankruptcy Court has issued contempt of court citations to the principals involved and such persons have fled the jurisdiction of New Mexico -- hence, the company remains unresolved. The return to each investor, nevertheless, is potentially \$5-10 per share, so it again seems rather "odd" that you have no interest in protecting or asserting any of Rorack's rights in the tens of thousands of shares it holds in IMS.

3. Furthermore, Dr. O'Rourke's long-asserted claims on Directed Energy Beam Weapon Systems will, indeed, be eventually implemented at Maxwell, even if such requires new directors, new counsel, new technical staff, etc. Dr. O'Rourke can hardly be faulted for insisting that a program created at Maxwell by you be carried out in conformity with the laws of physics instead of any laws of convenience
4. Furthermore, it should be asked why you seem so determined to "wreak havoc" both to Rorack and to Maxwell when your own business interests would logically presuppose an opposite course of action.

Might it be ventured that certain third-party individuals (i.e., Parker, Milliken, Clark & O'Hara, other Maxwell directors, other companies -- Bendix, SAI, or even individuals in the U.S. Defense Department network) have insisted that you sever all relations with Dr. O'Rourke? Perhaps it is your decision alone, but if not, then Rorack has an additional "intangible" among its assets, i.e., the right to sue such third parties for conversion, invasion of privacy, intentional impairment of business and contractual relations, securities fraud, defamation of character, etc.

5. Furthermore, you may rest assured that in my continuing investigation of Maxwell and Rorack's files, that if there does appear to be any evidence indicating such harmful activity, then I will, indeed, protect Rorack, Dr. O'Rourke's and your own partnership interests in such. Should you feel Dr. O'Rourke is not protecting your own interests, then it should be noted that Dr. O'Rourke has repeatedly made known to Karl Samuelian and to Parker, Milliken, Clark & O'Hara that they must not take any action detrimental to Rorack or preferential to Dr. O'Rourke as opposed to you. Indeed, seeing that you remain Chairman of the Board at Maxwell is an obvious "long-term" benefit to Rorack, notwithstanding your current "short-term" personal negativism in regard to Dr. O'Rourke. In

(Cont.)

Dr. Alan Kolb
Rorack/Maxwell Labs., Inc.
October 23, 1981
Page 3.

particular, neither Dr. O'Rourke nor myself are "out to get you."

6. Notwithstanding the above, should you still want Rorack cancelled in regard to your half interests, please call or write me (or have Karl do such, if you want to use him as an "informal" [non-preferential] adviser, and I or Dr. O'Rourke will personally reevaluate Rorack's partnership assets and see if such a dissolution is financially beneficial to all parties. It is presupposed, however, that there will be "serious" personal meetings and discussions and not any of Karl's former "two-minute simplicities" (i.e., the "doctrine of the unequal halves") which would have damaged Rorack for the reasons listed above.

Sincerely,

A. O'Rourke

AO'R/ljs

THE WHITE HOUSE

WASHINGTON

June 29, 1988

*Exh. 6.T
(1)*

Dear Mr. O'Rourke:

Your letter of April 9, 1988 to Arthur B. Culvahouse, Jr., Counsel to the President, has been referred to me for response. Your request for information concerning the files of Fred F. Fielding, formerly Counsel to the President, appears to be in the nature of a request under the Freedom of Information Act, which as a general matter governs disclosure of Executive Branch documents. Please be advised that the Office of the Counsel to the President, a part of the White House Office, is an entity whose "sole function is to advise and assist the President," and as such is not an "agency" subject to the Freedom of Information Act. Kissinger v. Reporters Committee for Freedom of the Press, 445 U.S. 136, 156 (1980). Accordingly, we respectfully decline to release the information which you request.

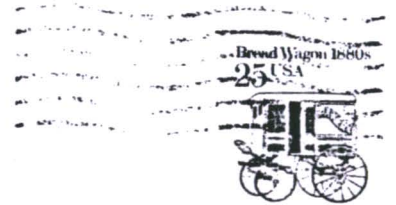
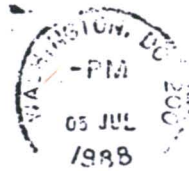
Sincerely,



Benedict S. Cohen
Associate Counsel to the President

Albert O'Rourke, Esq.
7949 Lowry Terrace
La Jolla, CA 92037

THE WHITE HOUSE
WASHINGTON



Albert O'Rourke, Esq.
7949 Lowry Terrace
La Jolla, CA 92037

*Explicit
(r)*

Albert O. O'Rourke

Attorney at Law

7949 Lowry Ter., La Jolla, Calif. 92037
(619) 459-7510

Mr. Benedict S. Cohen, Esq.
Associate Counsel to the President
The White House
1600 Pennsylvania Ave.
Washington, D. C. 20500

6-8-1988

Dear Mr. Cohen:

I am in receipt of your letter of June 29, 1988 which is puzzling to me since I am not asking for any records from the Presidential Counsel's Office to my knowledge, but rather simply making certain that the Presidential Counsel's Office has the true facts available to it, instead of the typical "scientific bunk" so favored by lawyers who have connections with the scientific community rather than any perception about scientists or science in general.

I am not blaming you personally for anything or seeking to embarrass you in any manner. Nevertheless, I have been flabbergasted with the incredible distortions inflicted upon American scientific ability by Mr. Fred Fielding during his tenure. I know nothing of Mr. Culvahouse, except his repeated silence.

I really think your Office should re-evaluate your association with the President's Science Advisor, and the scientific programs presented by you to the National Security Council or other Presidential advisors. I am specifically referring to those analyses of Russian ELF and EMP (extreme low frequency and electromagnetic pulse, i.e., "Tesla Programs") which have been presented respectively by such people as Dr. Frank Press, Dr. John Keyworth, and Kenneth Adelman. To state that there is going to be a "psychic shock" about such programs in the next few months is to state the obvious. May I remind you that for nearly ten years your Office in the Eisenhower and Truman Administrations thought there was no Russian missile program because the Russians set up German V-2 Scientists as a disinformation program to do nothing and to relate this back to the West, while all the time secretly working on their Missile programs in unknown areas of Russia.

Now, because of the situation at Maxwell Laboratories here in San Diego and the personal involvement of George Bush, George Deukmejian, Karl Samuelian, Esq., Marc D. Adelman, Esq.


Mr. Benedict S. Cohen, Esq.

7-8-1988

any sort of proper analysis and study of the true dimensions of the problem is simply "swept under the rug" because no one wants to embarrass either gentleman, whose campaigns have repeatedly been financed by those closest to them and to Maxwell.*

I would appreciate hearing something from someone in your scientific sections.

With kind regards,



Attorney Al O'Rourke

* By which I mean the Securities and Exchange Commission itself, which has repeatedly "backed off", pulled the computer information terminals, lost Files, and deliberately avoided having anything to do with the Maxwell problems even though it was their own representatives who approached me back in 1983. Now after five years and their deliberate botching of American science so as not to "make any waves" for public companies such as Maxwell, the SEC has the nerve to be screaming about Wedtech and other defense stocks, that supposedly the SEC never knew of any of these problems.

Exhibit
(5)

Mjr Alton D. Baxter, Jr.
CIA
Washington, D. C. 20505

July 12, 1982

Dear Mr. Baxter:

I am enclosing a copy of a recent letter from Plenum Press, which is self-explanatory. Note the date, 1978, and realized that the subject manuscript was written several years before that date. I did not attend that meeting in Italy and my paper was not presented to anyone except a few friends and V. Nardi (Stevens Institute). I am enclosing copies of several other relevant letters to inform you (CIA) of the fact that I have been trying to solicit some kind of response from my Government for a rather protracted period of time.

In the last 6 years, my model of the Unified Field has been improved in many ways with regard to "mathematics", but the "physics" has not really changed at all (the "Carbon-like" lattice Universe shown in Figures (1 - 2) are the very same as I am now using in my most recent manuscripts). It is, of course, inevitable that better models of Nature will come along to replace mine.

I have not been officially contacted by anyone in the (DOD). If C. Wilson had provided me with some (Names), I could have tried to accelerate the whole review process. Since you have kindly offered "further assistance to me" (you mean to "us"), perhaps you can try to resolve the Plenum Publication Problem.

For the record, only (CIA) has responded to my letters. I am quite pleased that (CIA) has an Office Of Public Affairs to communicate with "Crack-Pots" such as I. It is also relevant to note, that in the whole (6) years, no one in the Theoretical Physics Community of Peers has offered any kind of scholarly critique of my strange model of Nature. Presumably, that will come in the future when the whole work is finally abandoned or published. My friends in Electrical Engineering, fortunately, have been able to adopt quickly these new ideas about Nature as an active electrical network of super-current-ring sources (Quarks). I am enjoying my on-going conversations with these patient friends who are slowly teaching me basic things about real networks which will yield a series of future improved models of Nature.

It is sad that my own Government is not participating in any way in the evolution of these new ideas.

I heard E. Teller last night on the W. Buckley show. I can only pray that there is a deeper "secret" understanding somewhere in the Government of all of those ill-conceived matters which were being reviewed on that program. I would love to be commissioned by my own Government to prepare a series of "White Papers" on such matters as

Mr. Alton D. Baxter, Jr. (concl'd)

July 12, 1982

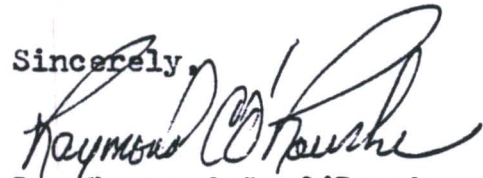
(Fusion Power, ABM, Nuclear Power, Directed Energy Beams, ...others...) and, thereby, to suggest that our Nation is basically on the "wrong-path" in all of these very costly ill-conceived programs and the Soviets may well discover the "right path" before us because they are seemingly more deeply committed to such matters.

I had dinner last night with a Harvard Dean Emeritus, who now believes that a most dangerous form of Anti-Intellectualism is spreading in our Nation. (The staff of our President is the apparent primary source of the disease, which is rampant in and native to California...so the Boston scenario runs...).

I also wrote a nice letter to our good President to let him know that we "intellectuals" are available to help him to examine the basic problems of our Nation. (I received the standard post-card ...thank you...from his staff). Writing letters to (CIA) is a bit more interesting, but it is self-evident that neither Casey nor Reagan has any manifest inclination to engage in such "intellectual" interactions. I hope Casey can tolerate my letters. Does he ever find time to read them?

Try to contact me in about 1 week on the Plenum...; I will now proceed to approve the publication of the old manuscript and you should notify me, if the Government wants to delay its publication.

Sincerely,



Dr. Raymond C. O'Rourke

ROR:j

Rourke & Associates inc.

7949 LOWRY TERRACE • LA JOLLA, CALIFORNIA 92037
P.O. BOX 5159 • ALBUQUERQUE, NEW MEXICO 87115

(714) 459-7510

March 27, 1980

Exhibit (52)

Dr. F. Press
1600 Pennsylvania Ave. NW
White House
Washington DC 20500

Dear Dr. Press,

Some of my friends and I who have given almost 4 decades (each) of our lives to serving our country in matters relating to the National Security are puzzled about a certain matter. Recently, in good faith, I asked your office to help me review a manuscript on some new physics ideas and to advise me if it contained any potential SR Data which is known to you, but unknown to me; ie., your office should legally help determine the security classification of all such manuscripts. This work of mine was not funded by the Government or anyone else, but nevertheless your office has been asked to provide legal advice to me in regard to the National Security through the proper channels. To date, I have not even received an acknowledgement of receipt of my manuscript. Do you not have a single bright physicist in your office who could properly handle this whole matter? If you do then why not have him contact me? Someday, your office will receive in the mail THE most important manuscript from THE next Einstein... you really should try to design a system to avoid the possibility of it slipping through the net.

I am enclosing the first of a series of manuscripts to be published in the open literature on the applications of the new theory. I have tried very hard to act as my own classification office in preparing this work for publication. Again, I hope to hear from some experts in your office about this particular manuscript.

Rourke & Associates inc.

7949 LOWRY TERRACE • LA JOLLA, CALIFORNIA 92037
P.O. BOX 5159 • ALBUQUERQUE, NEW MEXICO 87115

(714) 459-7510

I should remind you that over the last 2 years both my attorney (son) and I have repeatedly advised you about these matters and that we have been verbally informed, off the record, by your staff that these matters had been referred to a certain Mr. Jack Mc Carran (spelling?) who is identified as your special action/liason officer in charge of reviewing such matters and documents received (outside normal Government channels, ie. documents mailed to your office). What has happened in his office in regard to the subject matter?

Unless I immediately hear otherwise from your office (by phone or telex), I will presume that your office has no interest in the subject matters and I will proceed to publish my manuscripts in the open literature and do my best in regard to security classification.

With warmest regards,



Dr. Raymond C. O'Rourke

O'Rourke & Associates inc.

7949 LOWRY TERRACE • LA JOLLA, CALIFORNIA 92037
P.O. BOX 5159 • ALBUQUERQUE, NEW MEXICO 87115

(714) 459-7510

October 6, 1980

*Exhibit
(53)*

Dr. Donald Kerr, Director
Los Alamos Scientific Laboratory
P.O. Box 1663
Los Alamos, New Mexico 87545

Dear Dr. Kerr:

O'Rourke & Associates was recently informed that LASL may be in the process of developing an in-house Pulsed Power Science and Technology Group. We would be very interested in discussing the possibility of our participating in such a group. Looking back upon the history of pulsed power science and technology groups, it is now evident we failed to organize a critical Lorentz mass of individuals. Individuals dedicated to developing a long range plan for pulsed power development based on correct physics. Instead, we have a spectrum of hardware which has evolved by empirical approaches and severely constrained by inadequate funding and industry profit motives.

We believe that O'Rourke & Associates can be of significant assistance in re-establishing a strong physics oriented pulsed power program should you be interested. Many of my associates and I have been intimately involved with government and industry programs in Pulsed Power since 1950. I was associated with the establishment and direction of the Air Force Special Weapons Project Pulsed Power Group at Naval Research Laboratory from 1950 to 1960. At EG&G Inc., I established an AEC and DOD pulsed power group and directed it from 1960 to 1968.

In 1976, I formed O'Rourke & Associates Inc. and have been developing ideas and new approaches concerning pulsed power, fusion power, and directed energy beam systems. At present, I am writing a book of dialogues on a new branch of Physics known as "Quantum-Electrodynamics on a Lattice." I am developing a workshop on these latest theories with special emphasis on their use in developing concepts for fusion power and particle beam applications. This workshop will be conducted at NRL during the week of October 23, in connection with the E.O. Hulburt science award program. If you are interested in a similar workshop at LASL, one can easily be arranged.

We would appreciate your personal evaluation of our offer to help develop a strong science and technology oriented pulsed power group and look forward to meeting with you in the near future.

Sincerely



Dr. Raymond C. O'Rourke
O'Rourke & Associates Inc.

cb

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Exhibit
(34)

ADPM
MS 114

April 6, 1981

Dr. Raymond O'Rourke
O'Rourke & Associates Inc.
7949 Lowry Terrace
La Jolla, California 92037

Dear Dr. O'Rourke:

Donald Kerr has asked me to look into your inquiry to him dated February 4th concerning possible collaboration at the Los Alamos National Laboratory. I have contacted several of the divisions concerning this possibility and am sorry to report that there appears no interest at the present time.

This is not the most opportune time for such a venture for two reasons. First, the Director has implored the divisions to limit their consultant activity to a bare, essential level. Secondly, the budget prognosis is not now as bright as one might hope.

I would hope that you continue to keep up your contacts since there is always the possibility of better times. Your enthusiasm is apparent and I am sorry that I cannot offer you a more positive response.

Respectfully yours,

H. T. Motz

Henry T. Motz
Acting Deputy Associate Director
for Physics and Mathematics

cc: D. M. Kerr, DIR
CRMO (2)

McGraw-Hill Information Systems Company

P.O. Box 3057, Overlook Branch
Dayton, Ohio 45431
Telephone 513/252-2614



February 13, 1980

Exhib. T
(S5)

Dr. Raymond C. O'Rourke
O'Rourke & Associates, Inc.
7949 Lowry Terrace
La Jolla, California 92037

Dear Dr. O'Rourke:

This is to acknowledge receipt of the paper which you plan to publish and to advise you that it is being reviewed by the proper authorities within FTD as you requested.

General Keegan's current address and telephone number are as follows:

Major General George Keegan, Jr., (Ret), USAF
P. O. Box 55257
Fort Washington Station
Washington, DC 20022

Telephone: 301/292-4082

Your paper along with FTD's comment will be returned to you as soon as the review is completed.

Very truly yours,

Jerome N. Davis

Jerome N. Davis
Scientific Coordinator

JND:jrz

April 9 1980

J. N. Davis called me and said:

(1) FTD does not have the in-house expertise to evaluate my 2 documents but

(2) FTD sees no reason why the material should not be published

Isay (3) wow - the country needs help.



CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D. C. 20505

PUBLIC AFFAIRS

Phone: (703) 351-7676

7 May 1982

Exhibit 56

Mr. Raymond C. O'Rourke
O'Rourke & Associates, Inc.
7949 Lowry Terrace
LaJolla, California 92037

Dear Mr. O'Rourke:

Thank you for your recent letter to Admiral Inman in which you forwarded your paper titled "The Microscopic Electromagnetic Field" for possible CIA security review.

We understand your concern for the possible consequences of your research on the national security. For that reason, however, we believe the Department of Defense, which maintains primary cognizance over such matters, should be informed of both your research and your concern. Accordingly, I have forwarded your paper to DoD.

Thank you again for your very responsible interest.

Sincerely,

CE Wilson
Charles E. Wilson
Chief, Public Affairs

cc: DoD

O'Rourke & Associates inc.

7949 LOWRY TERRACE • LA JOLLA, CALIFORNIA 92037
P.O. BOX 5159 • ALBUQUERQUE, NEW MEXICO 87115

(714) 459-7510

February 7, 1980

Dr. E. Teller
P.O. Box 808, Mail Stop L75
Livermore, Ca. 94550

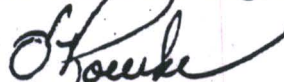
*Exhibit
(S7)*

Dear Dr. Teller,

I am enclosing a manuscript for your personal consideration; I hope you can find a time window in your busy life to discuss the "crazy" new ideas with me. I am a student of the late O. Laporte and I have been "quietly" working with the Government since 1942 on all kinds of things with which you are intimately connected.

I have seen you recently on TV and I subscribe to "almost all" of your remarks about National Security, the non-existence of real secrets in today's world, ... In this context, I think you will be pleased to discover for yourself the many manifest "new secrets" implicit in this manuscript. I have asked the Government to help me screen this material in regard to National Security. If you have any suggestions in this regard, I would be pleased to receive them. I would also be happy to visit with you at your convenience.

With warmest regards,



Raymond C. O'Rourke

P.S. I have enclosed a non-self-written resume so that you can, if you wish, know a little bit about my life in physics and what others have written about me.



CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D. C. 20505

PUBLIC AFFAIRS

Phone: (703) 351-7676

28 May 1982

Mr. Raymond C. O'Rourke
O'Rourke & Associates, Inc.
7949 Lowry Terrace
LaJolla, CA 92037

Exhibit (58)

Dear Mr. O'Rourke:

Thank you for writing the CIA :

I hope by now you have received our response to your first letter to Admiral Inman on May 7. We apologize for the delay. I am enclosing a copy of that response.

If we can be of further assistance to you, please let us know.

Sincerely,

Alton D. Baxter, Jr.
Alton D. Baxter, Jr.

Enclosure



CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D. C. 20505

PUBLIC AFFAIRS

Phone: (703) 351-7676

7 May 1982

Exh. t (59)

Mr. Raymond C. O'Rourke
O'Rourke & Associates, Inc.
7949 Lowry Terrace
LaJolla, California 92037

Dear Mr. O'Rourke:

Thank you for your recent letter to Admiral Inman in which you forwarded your paper titled "The Microscopic Electromagnetic Field" for possible CIA security review.

We understand your concern for the possible consequences of your research on the national security. For that reason, however, we believe the Department of Defense, which maintains primary cognizance over such matters, should be informed of both your research and your concern. Accordingly, I have forwarded your paper to DoD.

Thank you again for your very responsible interest.

Sincerely,

CE Wilson
Charles E. Wilson
Chief, Public Affairs

cc: DoD

Exhibit
(12)

XXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX

1-13-84

Dr. Alan Kolb
c/o Maxwell Laboratories, Inc.
8835 Balboa Ave.
San Diego, Ca. 92123

Dear Alan:

On behalf of Rorack in regard to Karl Samuelian's Jan. 11, 1984 letter to Dr. O'Rourke, yourself, and by inference of the 13,500 shares Rorack-Maxwell certificates, Rorack itself, please be advised as follows:

1. Dr. O'Rourke and Rorack take exception to Karl's statements that the rule 144 customer questionnaire form A and the form 144 notice of proposed sale of securities pursuant to rule 144 under the Securities Act of 1933, were in any way caused to be drafted on his initiative, in particular in regard to the section on form A which quite specifically mentions that the seller has no notice of any impending SEC litigation as Dr. O'Rourke further specifically brought up such point at the December 23, 1983 meeting with you and Karl up at Karl's law office in Los Angeles. As you know, it is my assertion whether right or wrong that Karl and someone in the SEC, if not Commissioner Shad, then someone acting upon Commissioner Shad's instructions "cut a deal" which would make it seem that Dr. O'Rourke was acknowledging that there are no matters of dispute between Dr. O'Rourke and Rorack, and Maxwell, Bendix Corporation, Systems, Science, & Software (and possibly International Ensign Ensign Systems). As you know, Commissioner Shad and the SEC have criminally charged Mr. Paul Thayer and certain Texas stock brokers with stock manipulation of Bendix Corporation and Mr. Shad has publicly proclaimed all the stock irregularities in regard to Bendix. On behalf of the defense attorney representing either Mr. Thayer or the Texas Group, I want the Rorack documents preserved in order to show that the SEC and Commissioner Shad have known about all different kinds of stock irregularity at Bendix, i.e., Bendix's Maxwell participation, and yet the SEC has not proceeded against other parties out of fear of exposing so called "national security interests" in the High Frontier program, known in full detail to both the Presidential Counsel, Mr. Fred Fielding, and the Presidential Science Advisor, Dr. George Keyworth.

(2)

Dr. Alan Kolb

1-13-84

2. I intend to have Rorack and its files used for the defense of Mr. Thayer, even if such material is never used at a trial (i.e., I leave open the possibility that its existence will be sufficient to persuade the U. S. attorneys working on the case of the innocence of Mr. Thayer and the ETexas Group compared to the actions of the SEC and its enforcement attorneys.

3. If you have any different point of view in regard to Rorack, you will please make such known to me, or Karl can contact the SEC himself.

Sincerely,

A. O'Rourke

AO:j

Albert O. O'Rourke

Attorney at Law

7949 Lowry Terrace • La Jolla, California 92037 • (714) 459-7510

Nov. 28, 1983

Exh: (T)
(T,)

Dr. Marshall M. Rosenbluth
Director
Maxwell Laboratory, Inc.
8835 Balboa Ave.
San Diego, Ca. 92123

Dear Dr. Rosenbluth:

As I have not heard back from either Dr. Alan Kolb or Karl Samuelian, nor anyone else at Maxwell about the Securities Exchange Commission's investigation of Maxwell, Systems, Science, & Software, and the many technical warnings about the basic physics problems at Maxwell in regard to their Bendix precipitator project, directed energy studies, and X-ray simulation work for Darpa, these warnings being made formally by Dr. Ray O'Rourke and Rorack, (Dr. Ray O'Rourke and Dr. Alan Kolb), and as you have apparently given both Karl Samuelian and Dr. Kolb your own technical assessment about the controversies, and as I am also a shareholder through the public offering of International Fusion Energy Systems Company, Inc. (INESCO), I thought I had better let you know before the December 15, 1983, Maxwell Shareholders' meeting that I intend to charge both Maxwell and every single one of its officers and directors with fraud, conspiracy, and deliberate obstruction of United States Securities laws in the public offering of Maxwell, the merger of Maxwell and S-Cubed and the corporate waste of the physics programs at Maxwell under contract to Darpa. If anyone thinks this is an idle bluff, he will rue such decision immediately thereafter.


The basic controversies of Rorack and Dr. Ray O'Rourke also have a profound effect upon INESCO, as both Dr. Ramy Shanny of INESCO and Dr. Beister of Science Applications Systems know perfectly well, since Dr. O'Rourke worked with them at SAI on these problems in regard to a merger of Maxwell and SAI in 1976, which never materialized, due to reasons known to both Dr. Beister and Dr. Shanny. Nevertheless, there are memorandum in the RORACK files still illegally withheld by Karl Samuelian and Dr. Kolb, apparently with your blessing, in Alan's office safe. I must therefore insist that as the scientific adviser of INESCO, you inform Dr. Robert W. Bussard, about this long standing controversy and its implications for INESCO. As you well know, there are many viewpoints about the future fusion energy, and it is your duty to obtain for INESCO, any reports of a physics nature, which would prove that INESCO, like Maxwell

Dr. Marshall M. Rosenbluth

11-28-83

is simply proceeding on the wrong path of physics laws, and is only squandering or wasting its shareholders' assets. I think it is fairly obvious that without the public offering, INESCO would have ceased to exist by the present time, and even after public offer the financial condition of the company would be so precarious, that an incorrect decision about the basic physics' laws and applications, will simply produce no workable fusion system and the company will be driven into bankruptcy. If the shareholders at that time want to look for someone to blame, I hope that the SEC will make them aware that this letter was filed by me with the SEC and Chairman John Shad at the present time and management chose not to investigate the Rorack reports known to you and Dr. Shanny. Additionally, I intend to have the SEC question Dr. Norman Rostaker of both INESCO and Maxwell, as Dr. O'Rourke has talked to him privately about these matters also.

Sincerely,


A. O'Rourke

AO:j

CC: Mr. R. C. Guccione
Mr. John Shad, SEC
Mr. Ramy Shanny
Mr. Norman Rostoker
Mr. Mike Mc Cormack
Dr. Robert W. Bussard
Dr. Alan Kolb
Dr. Melvin B. Gottlieb

Exh: 6.†
(T)
3

8835 Balboa Avenue
San Diego, CA 92123

October 31, 1983

Dr. Raymond C. O'Rourke
7949 Lowry Terrace
La Jolla, California 92037

Dear Ray:

I am not interested in investing in Global Analytics. If you want to sell some of your portion of the RORACK Maxwell shares to buy Global Analytics share, you can do so at any time. At the same time, I will take an equal number of Maxwell shares into my own account to either sell or retain, at my own discretion.

With best regards,

Sincerely,



Alan C. Kolb

ACK:mj

PROOF OF SERVICE BY MAIL

I, the undersigned, declare: That I am, and was at the time of service of the papers herein referred to, over the age of eighteen years, and not a party to the action; and I am employed in the County of San Diego, California, in which county the within-mentioned mailing occurred. My business address is 7949 Lowry Terrace, La Jolla, California 92037.

I served the following document(s):

PLAINTIFFS' OPPOSITION AND REPLY TO DEFENDANTS' MOTION TO DISMISS, MOTION FOR SANCTIONS, MOTION FOR MORE DEFINITE STATEMENT, MOTION TO STRIKE (?), ETC. PLAINTIFFS' MOTION FOR AN ORDER OF THE COURT FOR DEFENDANTS TO RETAIN SEPARATE COUNSEL, PLAINTIFFS' MOTION TO COMPEL ARBITRATION OR A PROPER REPORT TO THE COURT ABOUT THE ISSUES IN THIS CASE, PLAINTIFFS' OPPOSITION TO DEFENDANTS' REMOVAL OF THE STATE COURT ACTION TO FEDERAL COURT AND MOTION FOR AN ORDER REMANDING CASE BACK TO STATE COURT. PLAINTIFFS' MOTION FOR A CONSTRUCTIVE TRUST PURSUANT TO 31 U.S.C. 3927. DECLARATIONS OF ALBERT O'ROURKE, POINTS AND AUTHORITIES, EXHIBITS,

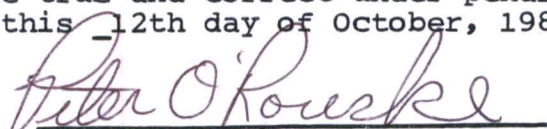
on the parties in said action by placing a true copy thereof in a separate sealed envelope for each addressee named hereafter, addressed to each such addressee respectively as follows:

- | | |
|---|--|
| 1. Post, Kirby, Noonan and Sweat
701 B Street, Suite 1400
San Diego, Ca. 92101-4532
(Attention: M. Kirby) | 2. Mr. Gregory Roper
Luce, Forward, Hamilton
and Scripps
1700 The Bank of California Plaza
110 West A Street
San Diego, California
92101 |
| 3. Mr. Bernie Cohen, Esq.
Assistant Presidential Counsel
The White House
1600 Pennsylvania Ave.
Washington, D. C. | 4. Mr. Irving Einhorn
U.S. Securities &
Exchange Commission
5757 Wilshire Blvd.
Suite 500 E.
Los Angeles, Cal.
90036 |

I then sealed each envelope and, with the postage thereon fully prepaid, placed it for mailing in accord with our business' practice on October 12, 1988 at La Jolla, California.

I am familiar with our business' practice for collecting, processing and mailing correspondence and pleadings with the United States Postal Service. Such correspondence and pleadings are deposited with the U.S. Postal Service on the same day that it is placed for mailing in the ordinary course of business.

I declare the foregoing to be true and correct under penalty of perjury, and such is executed this 12th day of October, 1988 at La Jolla, Cal. 92037.


Peter O'Rourke

595095 CU
CNO10

WHITE HOUSE
CORRESPONDENCE TRACKING WORKSHEET

Bel

- O - OUTGOING
- H - INTERNAL
- I - INCOMING

Date Correspondence Received (YY/MM/DD) / /

Name of Correspondent: Albert O. O'Rourke

MI Mail Report User Codes: (A) (B) (C)

Subject: Correspondence concerning Mahwell Laboratories and Rail gun

ROUTE TO:

ACTION

DISPOSITION

Office/Agency (Staff Name)	Action Code	Tracking Date YY/MM/DD	Type of Response	Completion Date YY/MM/DD
<u>cu hall</u>	ORIGINATOR	<u>8806128</u>		<u>C 8806129</u>
<u>cuat 34</u>	<u>R</u>	<u>8806129</u>	<u>BC</u>	<u>A 8806129</u>
	Referral Note:	<u> / / </u>		<u> / / </u>
	Referral Note:	<u> / / </u>		<u> / / </u>
	Referral Note:	<u> / / </u>		<u> / / </u>
	Referral Note:	<u> / / </u>		<u> / / </u>

- ACTION CODES:
- A - Appropriate Action
 - C - Comment/Recommendation
 - D - Draft Response
 - F - Furnish Fact Sheet to be used as Enclosure
 - I - Info Copy Only/No Action Necessary
 - R - Direct Reply w/Copy
 - S - For Signature
 - X - Interim Reply

- DISPOSITION CODES:
- A - Answered
 - B - Non-Special Referral
 - C - Completed
 - S - Suspended

FOR OUTGOING CORRESPONDENCE:

Type of Response = Initials of Signer
 Code = "A"
 Completion Date = Date of Outgoing

Comments: See ID 578493 CU

Keep this worksheet attached to the original incoming letter.
 Send all routing updates to Central Reference (Room 75, OEOB).
 Always return completed correspondence record to Central Files.
 Refer questions about the correspondence tracking system to Central Reference, ext. 2590.

RECORDS MANAGEMENT ONLY

CLASSIFICATION SECTION

No. of Additional Correspondents: _____ Media: L Individual Codes: 4640 _____

Prime Subject Code: CM 010 Secondary Subject Codes: _____

PRESIDENTIAL REPLY

Code	Date	Comment	Form
C	_____	Time: _____	P-
DSP	_____	Time: _____	Media: _____

SIGNATURE CODES:

- CPn - Presidential Correspondence**
 n - 0 - Unknown
 n - 1 - Ronald Wilson Reagan
 n - 2 - Ronald Reagan
 n - 3 - Ron
 n - 4 - Dutch
 n - 5 - Ron Reagan
 n - 6 - Ronald
 n - 7 - Ronnie

- CLn - First Lady's Correspondence**
 n - 0 - Unknown
 n - 1 - Nancy Reagan
 n - 2 - Nancy
 n - 3 - Mrs. Ronald Reagan

- CBn - Presidential & First Lady's Correspondence**
 n - 1 - Ronald Reagan - Nancy Reagan
 n - 2 - Ron - Nancy

MEDIA CODES:

- B - Box/package
 C - Copy
 D - Official document
 G - Message
 H - Handcarried
 L - Letter
 M - Mailgram
 O - Memo
 P - Photo
 R - Report
 S - Sealed
 T - Telegram
 V - Telephone
 X - Miscellaneous
 Y - Study

THE WHITE HOUSE

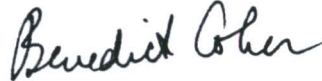
WASHINGTON

June 29, 1988

Dear Mr. O'Rourke:

Your letter of April 9, 1988 to Arthur B. Culvahouse, Jr., Counsel to the President, has been referred to me for response. Your request for information concerning the files of Fred F. Fielding, formerly Counsel to the President, appears to be in the nature of a request under the Freedom of Information Act, which as a general matter governs disclosure of Executive Branch documents. Please be advised that the Office of the Counsel to the President, a part of the White House Office, is an entity whose "sole function is to advise and assist the President," and as such is not an "agency" subject to the Freedom of Information Act. Kissinger v. Reporters Committee for Freedom of the Press, 445 U.S. 136, 156 (1980). Accordingly, we respectfully decline to release the information which you request.

Sincerely,



Benedict S. Cohen
Associate Counsel to the President

Albert O'Rourke, Esq.
7949 Lowry Terrace
La Jolla, CA 92037

THE WHITE HOUSE

WASHINGTON

June 27, 1988

MEMORANDUM FOR PHILLIP D. BRADY

FROM:

BENEDICT S. COHEN 

SUBJECT:

Albert O'Rourke -- Maxwell Laboratories and
Related files of Fred F. Fielding from 1982,
1983, and 1984

Attached for your review and signature is a letter to Mr. Albert O'Rourke, purportedly an attorney, who has written Arthur B. Culvahouse, Jr. asking that he confirm whether we still have possession of any of Fred F. Fielding's files on Maxwell Laboratories from 1982-84. He attached correspondence with the Regional Administration of the Securities and Exchange Commission and others, and he has since sent us copies of still more correspondence with the SEC, the news media, and Goldman Sachs & Co.

Central Records has given me a large sheaf of incoherent correspondence from Mr. O'Rourke in 1983, which I have attached. The subject matter is quite obscure, involving Maxwell Laboratories, apparently a defense contractor with which Mr. O'Rourke's clients were in some way involved, and a research program called the "Blue/Green Naval Program," possibly relating to SDI or submarine warfare; Rorach, apparently a partnership in which his clients were involved, and which is apparently related to Maxwell; the FCC; and the SEC and accusations of securities manipulation.

We referred the matter to the Office of Science and Technology Policy, which recommended no action by Counsel's Office, and we apparently did not in fact respond. Thus our "files" appear to be copies of Mr. O'Rourke's incoming correspondence, with the exceptions of our communications to and from OSTP and various tracking sheets. Nevertheless, we clearly should not and need not release such information. Accordingly, I have drafted a response, in which Paula Boggs (our FOIA expert) concurs, analogizing the inquiry to a FOIA request and declining it on those grounds.

Attachment

THE WHITE HOUSE

WASHINGTON

June 27, 1988

Not Sent

Dear Mr. O'Rourke:

Your letter of April 9, 1988 to Arthur B. Culvahouse, Jr., Counsel to the President, has been referred to me for response. Your request for information concerning the files of Fred F. Fielding, formerly Counsel to the President, appears to be in the nature of a request under the Freedom of Information Act, which as a general matter governs disclosure of Executive Branch documents. Please be advised that the Office of the Counsel to the President, a part of the White House Office, is an entity whose "sole function is to advise and assist the President," and as such is not an "agency" subject to the Freedom of Information Act. Kissinger v. Reporters Committee for Freedom of the Press, 445 U.S. 136, 156 (1980). Accordingly, we respectfully decline to release the information which you request.

Sincerely,

Phillip D. Brady
Deputy Counsel to the President

Albert O'Rourke, Esq.
7949 Lowry Terrace
La Jolla, CA 92037

6/28
Ben:
Pl. give me
a call on this.
Specifically
whether we should
respond at this
late date &
proceed
Phil
G - please redo
letter for my sig
Thanks
B

Copy Mr. Culvahose 6/21/88

59509504

Albert O. O'Rourke

Attorney at Law

7949 Lowry Ter., La Jolla, Calif. 92037
(619) 459-7510

Mr. Daniel Goelzer, Esq.
Chief Counsel
Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D. C. 20549

6-21-1988

Dear Mr. Goelzer:

Please find enclosed within a Copy of a News-story in the San Diego Union of Sunday, June 12, 1988, concerning Maxwell Laboratories (MXWL) out here in San Diego.

As Mr. Irving Einhorn will confirm to you, the Los Angeles Office of the Securities and Exchange Commission has numerous prior objections by me concerning these preposterous News stories which are continually leaked or made public for no other purpose than to continue "Party Time" i.e., preposterous and inflated salaries, bonuses, recreation, company trips, wine, women, and song of the most outrageous nature continuing at Maxwell.

This "tinker toy" Rail Gun hoax has been going on for four to five years now. It is identical in its sham and fraudulent public image to the equally notorious "death-ray" or "blue green laser" (which was only a communications device) foisted off on the public by the now bankrupt Helionetics, Inc. Moreover, a common director, shareholder, and master mind is Maxwell's current director, Mr. Tom Hayward (formerly Admiral and Captain dating back to the early days of ARPA).

It seems to me that your organization could do something against the "joy boys of the Pentagon" besides letting them ruin Maxwell shareholders. I mean really, the Pentagon does not need to use Maxwell as its vehicle for recreation and "fun in the sun" at the taxpayer's expense.

Sincerely,

Albert O. O'Rourke
Attorney Al O'Rourke

AO:m

CC - Irving Einhorn, Esq.
Los Angeles, Cal. SEC
A. B. Culvahose, Esq.
White House
Washington, D. C.

copy →

JUN 23 1988

Maxwell's rail gun big news

By S. Lynne Walker
Staff Writer

Maxwell Laboratories Inc. has made it big — but then again, that's part of the problem.

"The idea is to make it small," said Monson Hayes Jr., Maxwell's president and chief operating officer.

It is Maxwell's second-generation electromagnetic rail gun being developed as an armor-piercing weapon that can be mounted on tanks. If Maxwell succeeds in shrinking the gun and its power system to a practical size, "it could revolutionize gun technology," Hayes said.

The principle could be applied not only to state-of-the-art weapons such as the rail gun but to field artillery as well. "With electricity, we could fire howitzers twice as far," Hayes said.

The San Diego-based company's electromagnetic rail gun has come a long way since it was first conceived as a space-based device for the Strategic Defense Initiative, or "Star Wars" program.

The gun, which is 15 times more powerful than its predecessor, uses electromagnetic fields to propel bullets along the rail-like barrel at 6,000 mph.

Unlike conventional ammunition, the rail gun's bullets are lightweight plastic objects in a variety of shapes and sizes. Bullets pushed down the gun's 24-foot barrel by 2.6 million amps of electrical current have the impact of 2½ million pounds when they hit their target.

"The best-performing gun in use today fires bullets with a velocity of 3,000 mph," said Mike Holland, manager of Maxwell's kinetic energy technology program. "We're already well ahead of that."

However, more than 600 electricity-storing capacitors weighing 330 pounds apiece are needed to generate enough electricity to fire a single shot from the rail gun.

"This one would not work on a tank," Hayes said, patting the gun's still-warm barrel. "Weight is definitely an issue."

Critics say the rail gun and its support system are too large to be mobile.

"They'll certainly be able to get it smaller, but I think you'll still be looking at a convoy," said John Pike, associate director of space policy for the Federation of American Scientists.

"You're obviously can't fire that thing on the move," Pike said. "You're going to have to dig in, because that gun has a pretty ferocious recoil."

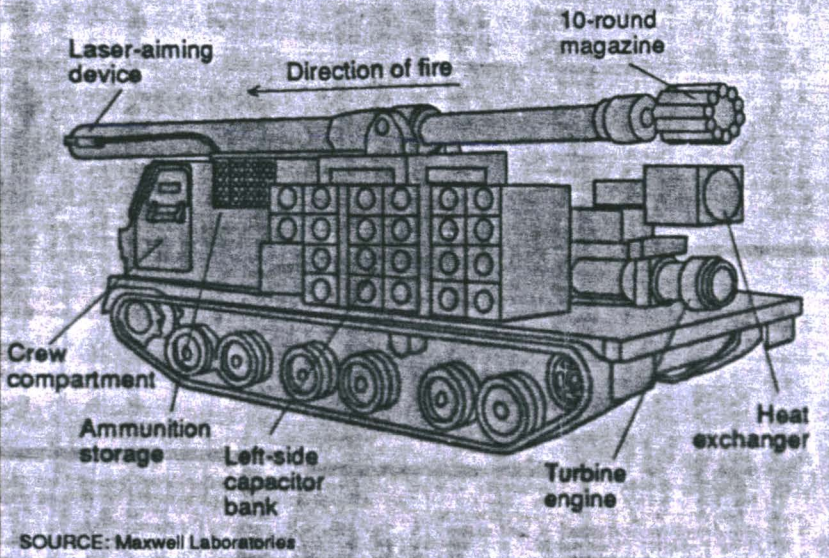
But military representatives say rail-gun technology is advancing so quickly that "the applications in the tactical realm are close at hand."

"Maxwell has shown that it can be done," said Army Maj. Michael Huebschman, who is assigned to SDI's innovative science and technical directorate. "The next thing that has to be done is to make the technology usable, reliable and capable of fitting on a tank chassis."

A rail gun mounted on a tank "will

Armor-piercing rail gun

Maxwell Laboratories' armor-piercing weapon of the future could send projectiles farther and faster than conventional guns. The rail gun uses electromagnetic fields to propel bullets along a rail in the barrel at 6,000 mph. The next challenge: Trying to make the gun lightweight and small enough to fit on a tank-like vehicle resembling this artist's conception.



The San Diego Union/Mike Cronan

have to have an auxiliary generator on board to be the prime source of power," said Huebschman.

However, less space will be required on board the tank for the rail gun's barrel and ammunition than for its conventional counterpart, he said, adding: "If you replace the 110 rounds the tank currently carries with 110 projectiles, you'll have more space for capacitors."

While conventional tanks fire with the same amount of kinetic energy,

they produce less velocity, so the size of the ammunition is larger.

In response to the need for smaller power packs, Maxwell has research under way to miniaturize capacitors for use on weight-sensitive vehicles such as tanks and spacecraft.

"It's definitely do-able," Huebschman said. "The time frame is a function of how much research and development funds you want to spend on it."

Because the rail gun is a line-of-

sight weapon, Pike says its effectiveness will be limited to short-range targets.

"If you're going with a short-range weapon, why not go with a rocket," asked Pike. "What is this going to do that a rocket launcher or some other conventional weapon can't do?"

Holland said the rail gun is being designed to destroy a tank up to three miles away.

While that is considered a short-range weapon, "it would reach farther than anything we have today," he said. "Typically, wars have been fought at a little over a mile range."

Maxwell developed the gun under a \$9 million contract with the Defense Nuclear Agency. Although the rail gun is envisioned as a weapon suitable for a tank, its first mission when the contract is completed December is to test the strength of armor against the bullets.

In addition to the rail gun's potential as an anti-armor weapon, "there is talk of theater defense using ground-based electromagnetic gun," said Huebschman.

The rail gun may also "fit into follow-on (SDI) architecture," said. "It might be a player, so we're pursuing some of the advanced technologies."

Maxwell ultimately hopes to develop a rail-gun system that resembles a tank and is capable of firing 100 rounds per minute for up to 10 minutes at a velocity of 3,000 mph, said Hayes.

"We strongly believe it could be done," he said. "The main question is when."

