

A F F I D A V I T

I, CHARLES J. SHOENS, say and declare:

1. I am employed by the BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY as a researcher and as the Director of Systems Techniques Laboratory at Leland Stanford Junior University. I have been continuously so employed in this or similar capacities since June 28, 1965 and previous to that from July 2, 1956 to March 31, 1964. In this capacity I am a researcher in Electrical Engineering. My office has at all times material herein in the Applied Electronics Laboratory on the Stanford campus.

2. The Applied Electronics Laboratory is in the complex of connected buildings in an area commonly known at Stanford as the "Science Quad". The Science Quad buildings taken together comprise facilities for research and teaching, particularly in the sciences and their supporting activities at Stanford.

3. The Applied Electronics Laboratory consists of two stories and a basement and houses the office of the Associate Dean for Research of the School of Engineering, the offices of faculty, staff and students of the School of Engineering, research laboratories, purchasing and accounting facilities, printing and copying equipment, records relating to the operations of these offices, and office machines, experimental equipment, some federally owned, and books and records relating to the operation of the offices in the building and office machines and equipment used by faculty, staff and students.

4. At approximately 10:45 p.m. on April 9, 1969, I was in the Applied Electronics Laboratory building. The doors to the building were locked and I observed a number of people outside the building, at the locked front doors and the back window. I saw these people enter the building through the front door.

5. Inside the Applied Electronics Laboratory, I personally observed the entrants sit on the floor in offices, doorways, conference rooms, lounges, libraries, lobbies and halls and on furniture. I personally observed the people further to walk on and sit on portions of the roof of the building. By their presence these people prevented

free entrance into and prevented free use of faculty, staff and student offices in the building.

6. In the evening of April 9, 1969 and the morning of April 10, 1969, I learned from the Stanford University's switchboard operator that long distance calls were being placed by people in the building, around the country and to overseas numbers including one call to Austria. I heard Professor William Rambo, Associate Dean for Research, order the telephone service to the building disconnected.

7. Approximately 12:00 p.m., April 9, 1969, I entered the basement area of the Applied Electronics Laboratory building and observed people preparing the multilith machine and using it. I left the building Thursday morning, April 10, 1969 at approximately 2:30 a.m. and I personally observed a number of people lay out sleeping bags and blankets and were preparing to sleep in the building.

8. Inside the Applied Electronics Laboratory, I heard various of the occupants at various times from April 9, 1969 to April 18, 1969 make statements to the effect that they intended to engage me and members of my staff and students in discussions and to demonstrate and to occupy the building in such a way as to prevent any research being done in the building, and that they intended to remain in the building and to continue their activities until the President of Stanford University and the members of Stanford University Board of Trustees agreed to terminate performance under certain contract by Stanford University, and to order Stanford Research Institute to terminate performance under certain other contracts.

9. Inside the Applied Electronics Laboratory Building, at various times from midnight April 9, 1969 to noon April 18, 1969, I observed that offices, secretaries areas and laboratory spaces were occupied by the demonstrators. Some offices and laboratory spaces were occupied, other spaces which were locked were not occupied.

10. Inside the Applied Electronics Laboratory Building at various times from midnight April 9, 1969 to noon April 18, 1969, I heard various individuals state that it was their intention to enter into any laboratories and office space which the researchers, faculty, staff and students entered and to occupy these areas from that point.

11. On Thursday, April 10, 1969, I together with members of my staff received and distributed notices to various individuals, from Stanford's President Kenneth Pitzer, notifying the occupants that they were disrupting a legitimate University activity and requesting them to leave the building. I personally handed one such notice to FRED COHEN, and observed him to read it and to remain in the building thereafter.

12. Inside the Applied Electronics Laboratory Building at various times between noon Friday, April 11, 1969 and noon Friday, April 18, 1969, I observed FRED COHEN engaged in meetings and talks with others. At various times in the same period, I further observed JAMES SHOCH and JOHN SHOCH in the publication area of the building using the multilith machine.

13. Inside the Applied Electronics Laboratory Building at various times from midnight April 9, 1969 to noon April 18, 1969, I observed various people using typewriters, multilith machines and other office equipment for production of written material. At such times, I also observed people examining personal papers and laboratory papers on open shelves.

14. At an evening rally on or about Monday, April 14, 1969, I observed LINCOLN MALIK speak to a number of people assembled in the Applied Electronics Laboratory courtyard. He urged that they escalate their occupation by entering, occupying and disrupting activities in another building, or several other buildings on the campus.

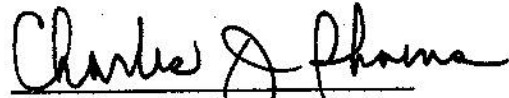
15. At various times after 12:00 noon, Friday, April 11, 1969 and before noon April 18, 1969, I observed DAVID PUGH in the building and engaged in discussions with other occupants inside the building.

16. Because of the physical occupation of offices, laboratories, lounges, libraries and halls, and because of people engaging me and members of my staff and students in discussions and denying me, my staff and students free use of our offices and laboratories and because of the noise and disturbance created by the activities of occupants, the presence of the occupants created such a disruption that all normal work within

the building was prevented and use of the facilities of the Applied Electronics Laboratory building was made impossible from 11:00 p.m. Wednesday, April 9, 1969 through noon Friday, April 18, 1969.

I declare under penalty of perjury that the foregoing is true.

Executed at Stanford, California on April 30th, 1969.


Charles J. Shoens