

ADMISSIONS

@ Admit that the Zack/Suskind study included the statement, "An analysis of the chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes will be the subject of a future paper."

@ Admit that Dr. Suskind and Judith Zack intended to produce a study of "chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes."

@ Admit that the data collection and analysis were conducted for "an analysis of the chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes."

@ Admit that the data collection and analysis were never performed for "an analysis of the chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes."

@ Admit that the study published as the Zack/Gaffey study is not the study described in the Zack/Suskind study as an "analysis of the chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes."

@ Admit that Monsanto identified Suskind, not Gaffey, as co-author of the "Zack/Gaffey" study in a 1980 press release.

@ Admit that Zack and Suskind conducted and wrote the study published as the Zack/Gaffey study.

@ Admit that Suskind withdrew his name from the study prior to its publication.

@ Admit that Gaffey was named as co-author of the Zack/Gaffey study only after Suskind withdrew his name from it.

@ Admit that prior to his name being substituted for Suskind's as co-author, Gaffey was not involved in the conduct or writing of the study published as the Zack/Gaffey study.

@ Admit that Gaffey actively participated in the design, research, data analysis, writing, and editing of the Zack/Gaffey study.

@ Admit that Gaffey was aware of the progress of both the

Zack/Suskind and Zack/Gaffey studies from their initial proposal stages through their publication.

@ Admit that Gaffey participated in the study design of both the Zack/Suskind and Zack/Gaffey studies.

PRODUCTION

@ All records discussing or relating in any way to the study described in the Zack/Suskind study as "An analysis of the chloracne cases and exposures not associated with this accident but rather with the normal TCP/2,4,5-T production processes."

@ All records discussing or referring in any way to the decision not to publish the study described in the Zack/Suskind study as "An analysis of the chloracne cases and exposures not associated with this accident but with the normal TCP/2,4,5-T production processes."

@ All records discussing or referring in any way to the decision to substitute Gaffey for Suskind as co-author of the Zack/Suskind study.

@ All communications between and among Gaffey, Zack, Suskind, and any Monsanto personnel discussing or referring in any way to authorship of the Zack/Gaffey study.

@ Copies of all protocols, study plans, study proposals, research materials, and drafts of the Zack/Suskind and Zack/Gaffey studies.

@ All protocols, study plans, study proposals, research materials, and drafts of all other studies of mortality in workers at Monsanto's Nitro, W.Va., plant, whether or not such studies were completed or published.

@ [NOTE: WE WANT ALL COPIES OF EACH DOCUMENT, WITH MARGIN NOTES, COVER LETTERS, ETC.]

@ All records discussing or referring in any way to Gaffey's demand for retraction from Peter Montague.

@ All records discussing or referring in any way to demands for retractions addressed to authors/writers, publications or media other than Peter Montague and Environmental Research Foundation, whether or not such demands were actually served.

@ All records discussing or referring in any way to any retraction subsequently printed or broadcast.

@ Copies of all retractions printed or broadcast.

@ Copies of all published papers authored or co-authored by Gaffey.

@ Copies of all unpublished papers (reports, summaries, surveys, etc.) discussing or referring in any way to dioxin authored or co-authored by Gaffey.

@ All records (including audio or video recordings, press clippings, personal communications, etc.) discussing or referring in any way to both Gaffey's character or integrity and the article by Peter Montague in Hazardous Waste News # 171. [HELP WRITE THIS!]

[COPY DOCUMENTS FROM PETER'S BINDERS: # 4, 8, 9, 10, 13, 15, 17, 18, 20, 28, 58, 59, 67, 85, 91, 92, 98, 107, 142, 143, 144, 145, 146, 147.]

CONTENTIONS