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FAX TRANSMISSION COVER SHEET

FAX # 1-503-528-7105

DATE: 11-03-93

PLEASE DELIVER TO THE FOLLOWING:

Name: Paul Merrell

Company: Bradley & Merrell

DOCUMENT FROM:

Name: John A. Michener

SPECIAL INSTRUCTIONS:

TO RECEIVING OPERATOR:

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Call 314/621-7755, Ext. 131, if you do not receive complete transmittal.

OFFICE USE ONLY:

Client No. 40

Matter No. 768

Atty. No. 15

Matter Name: Gaffey v. Montague

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

WILLIAM R. GAFFEY,)
)
 Plaintiff,)
)
 VS.) Cause No. 91-1938-C-7
)
 PETER MONTAGUE, et al.,)
)
 Defendants.)

RESPONSES TO
INTERROGATORIES OF DEFENDANTS DIRECTED
TO PLAINTIFF WILLIAM GAFFEY

Comes now Plaintiff and makes the following responses to
Interrogatories propounded by Defendants:

Interrogatories

1. Please state your complete employment history, including
for each different position held:

- a. Name and address of employer.
- b. Name and address of immediate supervisor.
- c. Title of position.
- d. Brief description of job duties.
- e. Beginning and ending dates of the position.
- f. Why you left that position.

ANSWER: Plaintiff objects to Interrogatory No. 1 on the grounds that it is overbroad, unduly burdensome, vague, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and without waiving same, Plaintiff states that he held several positions in the 1930's and late 1940's but does not recall details sufficient to respond to Interrogatory No. 1 and subparts thereto. Plaintiff can respond from 1949 to the present.

- (1) (a) Mathematics Dept., University of California
Berkeley, CA 94720
- (b) Jerzy Neyman, Deceased
- (c) Teaching and Research Assistant
- (d) Corrected papers, carried out statistical research
on various topics

- (e) Approximately 1949-1952
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- (a) Division of Biostatistics, University of California School of Public Health
Berkeley, CA 94720
 - (b) Jacob Yerushalmy, deceased
 - (c) Teaching Associate, Instructor, Assistant Professor
 - (d) Teaching elementary and graduate level biostatistics, consulting in biostatistics, research in theoretical statistics
 - (e) From 1953-1960
 - (f) To accept a position with the State of California
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- (a) California Department of Public Health
Berkeley, CA 94720
 - (b) Robert Dyar, M.D., deceased
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 - (d) Provided consultation to the statistical staff; rewrote statistical job descriptions and job classifications
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 - (b) Robert Dyar, M.D., deceased
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 - (d) Provide statistical consultation to research projects at Pacific Medical Center
 - (e) 1970-71
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- (5)
- (a) California Department of Public Health
Berkeley, CA 94720
 - (b) Ira Cisin, Ph.D., Current address unknown
 - (c) Associate Director, Human Population Laboratory for Epidemiologic Studies
 - (d) Supervised and reviewed work of professional research staff, provided consultation on statistical analysis
 - (e) From 1971-72
 - (f) To join a private consulting group
- (6)
- (a) Tabershaw Cooper Associates
2180 Milvia St.
Berkeley, CA 94720
 - (b) W. Clark Cooper, M.D.
3687 Mt. Diablo Blvd., Suite 320
Lafayette, CA 94549

- (c) Director, Health and Epidemiologic Studies
 - (d) Planned, carried out and presented results of epidemiologic studies to private and government clients
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- (7)
- (a) Stanford Research Institute
Menlo Park, CA
 - (b) David Discher, M.D.
Current address unknown
 - (c) Senior Epidemiologist
 - (d) Same duties as with Position (6) above
 - (e) From 1976-1979
 - (f) To join Monsanto Co.
- (8)
- (a) Monsanto Co.
800 N. Lindbergh Blvd.
St. Louis, MO 63167
 - (b) George Roush, Jr., M.D.
10 Babler Lane
St. Louis, MO 63124
 - (c) Epidemiology Director
 - (d) Established an in-house capability in epidemiology; established a data base for epidemiologic study of the Monsanto work force
 - (e) From 1979-1989
 - (f) Retirement
- (9)
- (a) William R. Gaffey, Inc.
11269 Pineside Drive
St. Louis, MO 63146
 - (b) None, self-employed
 - (c) President
 - (d) Epidemiologic Consultant;
Evaluate epidemiology studies and results
 - (e) 1989 - present
 - (f) Not applicable

2. State the names and addresses of any people you intend to call as expert witnesses, and state the general nature of the subject matter on which they will testify. Further, state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

ANSWER: Dr. George L. Carlo, 1513 16th Street N.W., Washington, D.C. 20036. Dr. Carlo will testify regarding the methodology used and the scientific validity of the study conducted by Dr. Gaffey which is the subject of this lawsuit. He may testify about Dr. Gaffey's standing in his profession and the impact of the publishing of the defamatory statements

by Defendants. Dr. Carlo will testify that the defamatory statements published by Defendants are untrue and may testify that said statements were published with reckless disregard for the truth. Dr. Carlo bases his opinions upon his background and familiarity with dioxin, epidemiologic methods and procedures and his review of documents produced to Defendants in discovery, and Plaintiff reserves his right to supplement Dr. Carlo's response with additional opinions and areas of testimony based on information to be received from Defendants or others during discovery. Dr. Carlo will be made available for deposition at a time and place mutually agreeable to the parties. Plaintiff has not determined the identity or identities of any additional expert witnesses at this time. Plaintiff reserves the right to supplement this item based on information obtained during discovery and reserves the right to identify rebuttal witnesses.

3. Are you aware of any statements made by defendants (other than the article in question) pertaining to plaintiff or Zack, or to any studies done by plaintiff or Zack, or to any other matter referred to in plaintiff's petition? If that statement was oral, please repeat it as exactly as you can. If the statement was written, recorded or transcribed, state the name and address of the person having custody of the statement and attach a copy of it to your answers.

ANSWER: See statement by Dr. Montague in Corporate Crime Report, in "Production of Documents, Item 1," and letters produced.

4. Does plaintiff claim any financial loss as a result of the article mentioned in plaintiff's petition (herein after "the article")? If so, for each different kind of financial loss, please state the following:

a. The amount of the loss.

ANSWER: Yes. Plaintiff estimates the current economic loss at approximately \$130,000. Plaintiff reserves the right to supplement his response to this item. Plaintiff believes that his good name, reputation and standing in his profession have been damaged and believes these characteristics have immense value.

b. Describe the nature of the loss, and how it was incurred.

ANSWER: The economic loss was income from consulting, which occurred in the years 1991, 1992 and 1993 following the publication of the article in 1990. Said loss will continue in the future.

ANSWER:

American Association for the Advancement of Science	1970-present
American Mathematical Society	1952-1963
American Public Health Association	1955-1990
American Statistical Association	1955-present
Biometric Society	1961-present
Institute of Mathematical Statistics	1949-present
New York Academy of Sciences	1970-present
Royal Society of Health	1968-present
Society for Epidemiologic Research	1978-present

b. If you have been an officer or director of any of the organizations listed in answer to subsection (a), please state the name of the office and the years held.

ANSWER: Not applicable.

c. Describe any special honors or awards you have received, including the name and address of the entity giving the award, and the year.

ANSWER: Appointed Associate Editor, American Journal of Epidemiology, 1986-1988.

d. List all articles, studies, letters, or other material that have been published in any form, including the title, name and address of publisher, date of publication, and general nature of the subject matter of your work.

ANSWER: Plaintiff has published 35 articles and book chapters which are listed in his curriculum vitae produced under "Request for Documents, Item 11." These dealt with problems in theoretical statistics and mathematics (Nos. 2, 3, 8, 11, 21, 34, 35), various topics in statistics applied to medicine and public health problems (Nos. 1, 4, 5, 6, 7, 9, 10) and studies of persons employed (Nos. 12, 13, 14, 24, 27, 28, 29), in various occupations (Nos. 15, 16, 17, 18, 19, 20, 22, 23, 25, 26, 30, 31, 32, 33).

e. Describe any teaching you have done, including name and address of the institution where you taught; the years in which you taught; and the name and description of the courses you taught.

ANSWER:

(1) Plaintiff taught for eight years at the University of California School of Public Health, from 1953 to 1960. Plaintiff taught the following courses:

Public Health 162 -
Introductory statistics for non-biostatisticians
Public Health 160A,B -
Introductory statistics for biostatistics majors
Public Health 262 - Bioassay for graduate students
Public Health 263 - Sampling theory

(2) Plaintiff taught occasional single courses in public health statistics to the staff while Plaintiff worked at the California State Health Department.

(3) Plaintiff taught a Continuing Education course in occupational epidemiology at a meeting of the American Occupational Medicine Association in 1976.

(4) Plaintiff now teaches an annual course in Epidemiology at Central Missouri State University.

f. List all speeches, presentations, or papers you have given or issued, including the title of the speech or presentation, describe its general nature, when and where given, and the name and address of the organization connected with the presentation.

ANSWER: Other than the talks which resulted in or from papers listed under "Request for Documents, Item 11," Plaintiff has given the following talks:

1986 - Industrial Epidemiology Forum (Chicago, IL). Talk entitled "A New Test For Ordered Alternatives."

1987 - Occupational Medical Section, British Medical Association (London). "Negative Epidemiology"

1988 - Industrial Epidemiology Forum (Seattle). "Epidemiologists and the Law."

Plaintiff has given perhaps a dozen other talks in the last 30 years, most of them on statistical topics, but cannot recall the precise titles or dates.

8. Did you conduct, author, or participate in a study of the effects of Dioxin, as mentioned in the article (hereinafter "the study")? If so, please state:

ANSWER: Defendants' article misdescribes the study in which Plaintiff was a participant.

a. Why you undertook the study, including the name, address, position and employer of the person who ordered or suggested that you undertake the study.

ANSWER: Plaintiff was the director of Monsanto's epidemiology program. Plaintiff initiated the idea for the study, and it was approved by his superior, Dr. George Roush.

b. Was the study undertaken as part of your job duties with Monsanto?

ANSWER: Yes.

c. Describe fully the data and documents on which the study was based.

ANSWER: The study was based on work history records from the Monsanto Nitro plant, vital status data obtained from the Social Security Administration, cause of death data obtained from death certificates, job title records and employee interviews.

d. State the name and address of all present custodians of that data and the documents, and describe any of the sources which are no longer in existence.

ANSWER: Plaintiff is not the custodian of said data and/or documents. Upon information and belief, the present custodian of those data is James J. Collins, Ph.D., Epidemiology Director, Monsanto Co., 800 N. Lindbergh Blvd., St. Louis, MO 63167.

9. List the names, addresses, positions, and employers of all persons who participated or worked on the study, and describe the role of each.

ANSWER:

Judith Zack - supervised coding and analysis of work history and death data. (Present address and employer unknown to Plaintiff.)

Janet Barnes - assisted in data collection and coding. (Still employed by Monsanto; phone 314-694-1000.)

Phyllis Korte - managed the acquisition, coding and storage of death certificates. (Still employed by Monsanto; phone 314-694-1000.)

10. For purposes of the study, describe fully and exactly on what basis you determined that a worker had been "exposed" or not exposed to Dioxin. Further, state the rationale for that determination. If that determination was based upon any scientific authority, cite the authority fully.

ANSWER: See definition in study.

11. State the names and addresses of all persons with personal knowledge that the statements of which plaintiff complains were made by defendants with knowledge that they were false, or with reckless disregard as to the truth of those statements. For each such person, please state:

ANSWER: Objection. Plaintiff objects to this interrogatory on the grounds that it calls for speculation, is overly broad, vague and seeks information that is not competent, relevant or material. In response, Plaintiff states that Dr. Montague knew or should have known that the statements were false or published with reckless disregard for the truth. Plaintiff will respond further to this item upon receipt of information regarding Defendants' sources and source material through discovery. Discovery is continuing.

12. State the names and addresses of any Monsanto employees or consultants who disagreed with or questioned the methodology or results of your study.

ANSWER: Plaintiff is unaware of any such persons.

13. State the names and addresses of any other persons or entities who disagreed with or questioned the methodology or results of your study. If that was expressed in an article or publication, fully cite it.

ANSWER: Plaintiff has no first hand knowledge of any such persons. See response to Interrogatory No. 15 below.

14. Are you aware of any studies of the effects of Dioxin (other than the one referred to in interrogatory number 8) which were in any way devised or conducted by any persons connected with Monsanto? If so, for each such study, please state:

a. When it was conducted; the title of the study; and fully cite any publication of it.

ANSWER: Zack, J. A. and Suskind, R., The Mortality Experience of Workers Exposed to Tetrachlorodibenzodioxin in a Trichlorophenol Process Accident. J. Occup. Med. (1980); 22:11-4. Plaintiff is also aware of a physical examination study of some Monsanto employees believed by Plaintiff to have been conducted in 1983 or 1984 by Dr. Raymond Suskind of the University of Cincinnati. It was published in JAMA, Vol. 251 (1984) pp. 2372-2300.

b. State the names and addresses of the persons who devised or conducted the study, and describe the role of each.

ANSWER: Plaintiff did not participate in the studies described in 14(a) above.

c. Describe fully the data and documents on which the study was based.

ANSWER: See response to item 14(b) above.

d. State the name and address of all present custodians of the study, the data and the documents, and describe any of the sources which are no longer in existence.

ANSWER: See response to item 14(b) above.

e. Describe fully and exactly on what basis it was determined that a subject of that study had been "exposed" or not exposed to Dioxin. Further, state the rationale for that determination. If that determination was based on a scientific authority, cite the authority fully.

ANSWER: See response to item 14(b) above.

15. State the names and addresses of any persons or entities who disagreed with or questioned the methodology or results of the studies referred to in interrogatory number 14.

ANSWER: See documents produced and citations therein.

STATE OF MISSOURI)
) SS.
COUNTY OF ST. LOUIS)

Comes now the plaintiff, WILLIAM R. GAFFEY, being of lawful age and first duly sworn, and states that he has read the foregoing responses to Interrogatories and finds the same to be true and accurate to the best of his knowledge, information and belief.

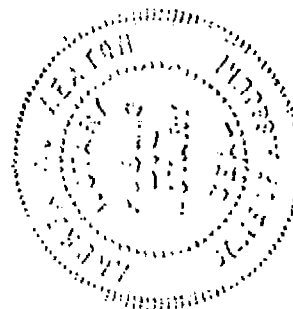
William R. Gaffey
WILLIAM R. GAFFEY, Plaintiff

Subscribed and sworn to before me, a notary public commissioned in the County and State aforesaid, this 1st day of ~~October~~, 1993.
NOVEMBER

Andrea M. Keaton
Andrea M. Keaton, Notary Public

My commission expires:

ANDREA M KEATON
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP AUG. 9, 1996



LEWIS, RICE & FINGERSH

By *Daniel D. Zegura*
Richard A. Wunderlich
Daniel D. Zegura

8182 Maryland Avenue, Suite 400
Clayton, Missouri 63105
(314) 854-8544

Attorneys for Plaintiff

Certificate of Service

The undersigned counsel for plaintiff certifies that true copies of the foregoing were mailed first class U.S. Mail, postage prepaid, the 2nd day of November, 1993, to the following attorneys of record:

John A. Michener, Esq.
EVANS & DIXON
1200 Saint Louis Place
200 North Broadway
St. Louis, MO 63102

Gerald Ortvals, Esq.
GREENSFELDER, HEMKER & GALE
1800 Equitable Building
10 South Broadway
St. Louis, MO 63102

Daniel D. Zegura

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

WILLIAM R. GAFFEY,)
)
Plaintiff,)
)
VS.) Cause No. 91-1938-C-7
)
PETER MONTAGUE, et al.,)
)
Defendants.)

PLAINTIFF'S RESPONSE TO DEFENDANTS'
REQUEST FOR PRODUCTION OF DOCUMENTS

Comes now plaintiff, by and through his counsel, and in response to Defendants' Request for Production of Documents, states as follows:

Document Requests

1. Any statements by defendants concerning plaintiff, Judith Zack, or Raymond Suskind, or any of the matters alleged in plaintiff's petition.

RESPONSE: Discovery continuing. See copy of Corporate Crime Reporter Interview with Peter Montague (envelope marked "Production of Documents, Item 1"), article attached to Plaintiff's Complaint and documents produced in response to Request Nos. 7 and 13 below.

2. The study done by plaintiff and Zack concerning Dioxin (hereinafter "the study"), mentioned in defendants' article referred to in the petition (hereinafter "the article"), including all work papers, notes, memos, and correspondence related to the study.

RESPONSE: Plaintiff is not in possession of any documents relating to the study other than the study itself, a copy of which is produced.

3. All medical records, employment records, data, and other documents pertaining to the exposure of Monsanto workers to Dioxin, and the effects of that exposure. (Exposure is defined as any exposure at any level, whether acute or chronic).

RESPONSE: Plaintiff is not in possession of any such documents.

4. Any standards, treatises, or other documents upon which the definition or determination of exposure was based for purpose of the study.

RESPONSE: See definitions section in the study.

5. All directives, memos, correspondence, or other instructions or suggestions you received at any time from any person at Monsanto regarding the study.

RESPONSE: Plaintiff has no responsive documents.

6. Any publication of the study.

RESPONSE: See response to request number 1 above.

7. Any correspondence related to the study or the article between plaintiff or Zack and the defendants.

RESPONSE: Responsive documents have been produced.

8. Any correspondence, notes, or memos sent to plaintiff, Zack or Monsanto regarding the article.

RESPONSE: Plaintiff is unaware of any responsive documents.

9. If you are claiming any financial loss, your federal and state income tax returns, together with all attachments, for the years 1985 through the present.

RESPONSE: Responsive documents have been produced.

10. Any documents describing or evidencing any financial or other loss as a result of the article.

RESPONSE: Responsive documents have been produced. Discovery continuing.

11. Your curriculum vitae and resume.

RESPONSE: See document produced.

12. All articles, books, speeches, letters, or presentations you have given or written professionally.

RESPONSE: Responsive documents will be produced for inspection at a mutually agreeable time and location.

13. Any correspondence regarding the article or the study between plaintiff and any person or entity.

RESPONSE: Objection. Plaintiff objects to this request to the extent it calls for materials protected by the attorney-client privilege and/or the attorney work product doctrine, and on the grounds that the request is overly broad, vague, unduly burdensome and harassing. Subject to these objections and without waiving same, all responsive non-privileged documents have been produced.

14. All documents advertising or giving notice of any speaking engagements, publications, or programs in which plaintiff participated.

RESPONSE: Plaintiff has no responsive documents in his possession.

15. Any other studies, together with work papers, notes, memoranda, and correspondence, relating to the effects of Dioxin exposure done by plaintiff or other persons connected with Monsanto, including but not limited to Raymond Suskind and Judith Zack.

RESPONSE: Plaintiff has done no studies of dioxin exposure other than the one in question, and Plaintiff possesses no documents relating to other studies. Citations for the other studies have been provided in response to Defendants' interrogatories.

16. Any standards, treatises, or other documents upon which the definition or determine of exposure was based in any of the studies referred to in request number 15.

RESPONSE: See response to request number 15 above.

17. Any standards, treatises, or other documents upon which the definition or determination of exposure was based in any other studies you have conducted or participated in regarding exposure to hazardous chemicals of any kind.

RESPONSE: Responsive documents will be produced for inspection at a mutually agreeable time and location.

18. Any correspondence, articles, studies, commentaries or other documents criticizing the study, or criticizing any other studies relating to the effects of Dioxin exposure done by plaintiff or other persons connected with Monsanto, including but not limited to Raymond Suskind or Judith Zack.

RESPONSE: Any responsive documents in Plaintiff's possession have been produced in response to prior requests.

LEWIS, RICE & FINGERSH

By

John D. Zegura
Richard A. Wunderlich
Daniel D. Zegura
8182 Maryland Avenue, Suite 400
Clayton, Missouri 63105
(314) 854-8544
Attorneys for Plaintiff

Certificate of Service

The undersigned counsel for plaintiff certifies that true copies of the foregoing were mailed first class U.S. Mail, postage prepaid, the 20 day of November, 1993, to the following attorneys of record:

John A. Michener, Esq.
EVANS & DIXON
1200 Saint Louis Place
200 North Broadway
St. Louis, MO 63102

Gerald Ortvals, Esq.
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1800 Equitable Building
10 South Broadway
St. Louis, MO 63102

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3 '93 11:20 FROM EVANS DIXON ATTY TO 14102638944 PAGE.002/017

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

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Interrogatories

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- b. Name and address of immediate supervisor.
- c. Title of position.
- d. Brief description of job duties.
- e. Beginning and ending dates of the position.
- f. Why you left that position.

ANSWER: Plaintiff objects to Interrogatory No. 1 on the grounds that it is overbroad, unduly burdensome, vague, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and without waiving same, Plaintiff states that he held several positions in the 1930's and late 1940's but does not recall details sufficient to respond to Interrogatory No. 1 and subparts thereto. Plaintiff can respond from 1949 to the present.

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Workload too light for a full-time position.
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 - (d) Supervised and reviewed work of professional
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Evaluate epidemiology studies and results
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2. State the names and addresses of any people you intend to call as expert witnesses, and state the general nature of the subject matter on which they will testify. Further, state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

ANSWER: Dr. George L. Carlo, 1513 16th Street N.W., Washington, D.C. 20036. Dr. Carlo will testify regarding the methodology used and the scientific validity of the study conducted by Dr. Gaffey which is the subject of this lawsuit. He may testify about Dr. Gaffey's standing in his profession and the impact of the publishing of the defamatory statements

by Defendants. Dr. Carlo will testify that the defamatory statements published by Defendants are untrue and may testify that said statements were published with reckless disregard for the truth. Dr. Carlo bases his opinions upon his background and familiarity with dioxin, epidemiologic methods and procedures and his review of documents produced to Defendants in discovery, and Plaintiff reserves his right to supplement Dr. Carlo's response with additional opinions and areas of testimony based on information to be received from Defendants or others during discovery. Dr. Carlo will be made available for deposition at a time and place mutually agreeable to the parties. Plaintiff has not determined the identity or identities of any additional expert witnesses at this time. Plaintiff reserves the right to supplement this item based on information obtained during discovery and reserves the right to identify rebuttal witnesses.

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ANSWER: See statement by Dr. Montague in Corporate Crime Report, in "Production of Documents, Item 1," and letters produced.

4. Does plaintiff claim any financial loss as a result of the article mentioned in plaintiff's petition (herein after "the article")? If so, for each different kind of financial loss, please state the following:

a. The amount of the loss.

ANSWER: Yes. Plaintiff estimates the current economic loss at approximately \$130,000. Plaintiff reserves the right to supplement his response to this item. Plaintiff believes that his good name, reputation and standing in his profession have been damaged and believes these characteristics have immense value.

b. Describe the nature of the loss, and how it was incurred.

ANSWER: The economic loss was income from consulting, which occurred in the years 1991, 1992 and 1993 following the publication of the article in 1990. Said loss will continue in the future.

c. Show exactly how you calculated the amount of the loss.

ANSWER: This figure is derived from lost consulting opportunities billed at Plaintiff's usual hourly rate of \$125. Plaintiff expected that consultation would take approximately 10% of his time in 1990, 15% in 1991, and level off in 1992 and following years at about 20%. Actual hours of work have been substantially lower, causing a shortfall through 1993 of approximately \$130,000.

d. State during what period of time the loss was incurred.

ANSWER: The loss was incurred from the point of publication and ending December 31, 1993.

5. Other than as set out in answer to the preceding interrogatory, do you claim that you have or will suffer any loss as a result of the article? If so, fully describe the nature of the loss, the amount, how you calculated the amount, and the period when incurred.

ANSWER: Plaintiff believes he will continue to suffer loss of income in the future as the result of Defendants' defamatory statements per Plaintiff's response to Interrogatory No. 4 above. Plaintiff's loss of his reputation, good name and standing in his profession may continue as well.

6. Please state the names and addresses of all persons who have a lower opinion of plaintiff's integrity, honesty, or professional competence as a result of reading the article. For each of those persons, please state:

ANSWER: Objection. Plaintiff objects to this interrogatory on the grounds that it calls for speculation, is overly broad, vague and seeks information that is not competent, relevant or material. Subject to this objection and without waiving same, Plaintiff believes that anyone who read Defendants' article would understand from the defamatory article that Plaintiff performed a fraudulent study thus impugning Plaintiff's integrity, honesty and professional competence.

7. In regard to your professional background, please state the following:

a. List all professional organizations to which you have belonged, including the years which you have belonged to them.