

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

NASSAU COUNTY, et al.,

Defendants.

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Civil Action No. 77-C-1881
FXA

INTERROGATORIES OF PLAINTIFF UNITED STATES
TO THE NASSAU COUNTY DEFENDANTS

Pursuant to Rule 33, F.R.Civ.P., plaintiff United States requests defendants Nassau County, Samuel Rozzi, Commissioner, Nassau County Police Department, Gabriel S. Kohn, Edward S. Witanowski and Edward A. Simmons, Commissioners, and the Nassau County Civil Service Commission (hereinafter collectively referred to variously as the "Nassau County defendants," "Nassau County" or the "County") to answer the following interrogatories within thirty (30) days after the date upon which they are served.

These interrogatories shall be deemed to be continuing and any information secured by any of the Nassau County defendants subsequent to the filing of its answers hereto, which would have been included in its answers had such information been known, should be provided to the United States by supplemental answer.

It is requested that the Nassau County defendants restate each interrogatory in full before the answer to it. If the answer to any interrogatory incorporates or refers to the answer to any other interrogatory, the pertinent information incorporated or referred to should be clearly specified.

DEFINITIONS

Unless a contrary meaning clearly appears in the context, the following definitions shall apply to these interrogatories:

a. "Document" as used herein shall include:

- (1) Any paper or writing of any kind, including but not limited to: a report; study; analysis; memorandum; letter; telegram; calendar or diary; minutes; pamphlet; notes; chart; tabulation; press release; published book, article, treatise or paper; photograph; accounting entry; accountant's work paper; receipt; voucher; agreement; contract; financial statement; recording of minutes, conferences, and telephone or other communications;
- (2) Any draft of any document as defined in Paragraph a(1), supra;
- (3) Any alterations, notes, comments or other material not included in the original of any document as defined in Paragraph a(1), supra; and

- (4) The data base and all output, either in printed or machine-readable form, of any computerized data recording, storage, analyzation and retrieval system (e.g., tapes, punch cards, microfilm, printouts), as well as the written information necessary to understand and use such data base or output.

b. "Identify" or "identity" when used with respect to a person means to state that person's:

- (1) Full name, sex, race (e.g., white, black) and national origin (e.g., Hispanic);
- (2) Present complete home address or, if not known, last known complete home address;
- (3) Present employer, complete business address and telephone number, job title (or rank, if a sworn officer) in which employed, and duties and responsibilities in that job; or, if present employer not known, last known employer, complete business address and telephone number, job title or rank in which employed, and duties and responsibilities in that job or rank; and
- (4) Business, profession and/or occupation if that person is self-employed, as well as that person complete business address and telephone number and the name of that person's company, firm or business.

c. "Identify" or "identity" when used with respect to a document means to state:

- (1) The type of document (e.g., report, study, analysis, memorandum, letter, minutes, microfilm, punch card, recording used in data processing, tape recording in machine-readable form, etc.);
- (2) Its date and place of origin, identities of author(s) and addressee(s), date of communication or delivery, its present location of custody, and full name and complete address of its custodian; and
- (3) If such document, record or other memorandum has been published, its title, author, date and place of publication, name of publisher and Library of Congress number.

INTERROGATORY NUMBER 1

Set forth the precise date in December 1983 upon which Nassau County administered or caused to have been administered the Police Officer written examination (the "1983 Police Officer Exam" or the "Exam") to which William H. Pauley, III, Esquire, makes reference in his June 4, 1984 letter to John M. Gadzichowski, Esquire.

INTERROGATORY NUMBER 2

Identify the person who had overall responsibility for the administration of the 1983 Police Officer Exam.

INTERROGATORY NUMBER 3

Set forth the total number of locations at which the 1983 Police Officer Exam was administered; provide the name, address, county (e.g., Nassau, Suffolk, etc.) or borough (e.g., Queens, Bronx, etc.) and a brief description of each such location; and identify, by location, each person who participated in the administration of the Exam.

INTERROGATORY NUMBER 4

With respect to the 1983 Police Officer Exam administered by Nassau County, set forth:

a. A complete description of the Exam itself; as well as any informational, instructional or study manuals, booklets or other materials which were distributed among or used to instruct, tutor or prepare candidates for the Exam prior to the administration of the Exam;

b. A complete description as to the purpose, planning, design, formulation, construction, administration and grading of the Exam, as well as to the methodology followed in the planning, design, formulation, construction, administration and grading of the Exam;

c. The identity of each person who participated in the planning, design, formulation, construction and grading of the Exam; and for each person so identified:

- (1) A complete description as to the precise role that person played in the planning, design, formulation, construction and grading of the Exam; and the precise dates and duties and responsibilities of that person in that role; and
- (2) A complete description as to that person's educational, professional and work background;

d. The cut-off (i.e., passing) score (set forth both as a raw score and as a percentage) of the Exam; as well as:

- (1) A complete description as to how such cut-off score was formulated;
- (2) The precise bases for that cut-off score as opposed to either a higher or a lower cut-off score; and
- (3) The identity of each person who participated in the formulation and establishment of that cut-off score; and a complete description as to the precise role that person played in such formulation and establishment; and

e. The number (e.g., 1, 2, 8, 116, etc.) of each test item which was dropped when scoring the Exam; the precise reason(s) for dropping that test item; the identity of each person who participated in the determination to drop that test item; and a complete description as to the precise role that person played in such determination.

INTERROGATORY NUMBER 5

Set forth all tabulations, estimates, samplings and analyses of any type undertaken by or at the direction of Nassau County, or of which the County has knowledge, with respect to:

a. The distribution of scores achieved by all persons who took the 1983 Police Officer Exam, by race, sex, national origin and any other demographic characteristic (e.g., level of education, place of residence, age, etc.);

b. The impact of the Exam, and each test item thereof (as the term "impact" is used in Paragraph 5 of the April 21, 1982 Consent Decree) by race, sex, national origin, and any other demographic characteristic; and

c. The name, sex, race (e.g. white, black), national origin (e.g., Hispanic), rank, date of appointment, name of command, method of selection, date of administration and score achieved by each incumbent Nassau County Police Department (the "NCPD") sworn officer who was administered the 1983 Police Officer Exam or one like or similar to it.

INTERROGATORY NUMBER 6

State whether Nassau County concedes that the 1983 Police Officer Exam had an adverse impact (as the term "adverse impact" is used in Paragraph 5 of the April 21, 1982 Consent Decree):

a. In terms of pass/fail, upon:

(1) Blacks;

(2) Hispanics; or

- (3) Women; and/or
- b. In terms of rank-ordering of scores; upon:
 - (1) Blacks;
 - (2) Hispanics; or
 - (3) Women.

INTERROGATORY NUMBER 7

If Nassau County's answer to any subsection (e.g., a.(1), b.(2), etc.) of Interrogatory Number 6, supra, is in the negative:

- a. Set forth each and every reason upon which the County bases it's negative answer; and
- b. Identify each document upon which the County relies, in whole or in part, to support its negative answer.

INTERROGATORY NUMBER 8

Set forth all information and identify each document, whether in the possession of Nassau County or of which the County had knowledge prior to the administration of the 1983 Police Officer Exam, which reflected, predicted, cautioned or discussed the possibility that the 1983 Police Officer Exam, or an examination like or similar thereto, would have an adverse impact upon blacks, Hispanics or women.

INTERROGATORY NUMBER 9

Describe in detail all efforts, if any, undertaken by, or at the direction or with the knowledge of, Nassau County to lessen

the adverse impact of the 1983 Police Officer Exam upon blacks, Hispanics or women.

INTERROGATORY NUMBER 10

Describe in detail all efforts, if any, undertaken by, or at the direction or with the knowledge, of Nassau County since January 1, 1980 in considering, evaluating or determining the suitabilities of various criteria or devices for the selection of applicants for police officer in the NCPD; describe in detail each such criterion or device, the suitability of which was considered, evaluated or determined; set forth each and every reason why such criterion or device, if other than the 1983 Police Officer Exam, was not used; and set forth each and every reason why the 1983 Police Officer Exam was used instead of one or more of the other criteria or devices.

INTERROGATORY NUMBER 11

State whether Nassau County intends to use the results of the 1983 Police Officer Exam in the selection of applicants for appointment to Police Officer in the NCPD; and, if so, state whether the County intends to use the results of the Exam;

- a. On a pass/fail basis; or
- b. On a rank-ordering of scores basis.

INTERROGATORY NUMBER 12

State approximately how many police officers Nassau County estimates it will appoint from the eligibility list for the 1983

Police Officer Exam, as well as the date by which the County estimates it will commence making such appointments.

INTERROGATORY NUMBER 13

State whether it is Nassau County's position that the 1983 Police Officer Exam is validated in accordance with Title VII and with the Uniform Guidelines on Employee Selection Procedures (the "Uniform Guidelines"), as required by the April 21, 1982 Consent Decree.

INTERROGATORY NUMBER 14

If Nassau County's answer to Interrogatory Number 13, supra, is in the affirmative, set forth:

a. Each and every basis for the County's position that the 1983 Police Officer Exam is valid in accordance with Title VII and with the Uniform Guidelines;

b. The identity of each and every document upon which the County relies, in whole or in part, to support its position that the Exam is valid in accordance with Title VII and with the Uniform Guidelines;

c. Whether it is the County's position that the 1983 Police Officer Exam has been validated according to:

- (1) A content validity strategy;
- (2) A concurrent criterion-related validity strategy;
- (3) A predictive criterion-related validity strategy;
- and/or
- (4) The principles of construct validity.

d. If the County's answer to either subparagraph c(2) or subparagraph c(3) of this Interrogatory is in the negative, state whether the County is of the position that the validity strategy set forth in each of those subparagraphs, respectively, would or would not have been technically feasible to have undertaken and, if not, precisely why not;

e. The identity of each and every person upon whose opinion the County relies, in whole or in part, to support its position that the Exam is validated in accordance with Title VII and with the Uniform Guidelines, as well as:

- (1) A detailed description of that person's opinions as to the validity of the Exam (or any portion thereof), as well as the bases for such opinions;
- (2) The identity of each document which requests, solicits, sets forth, reflects, describes, analyzes, criticizes, discusses or in any way comments either upon that person's opinions as to the validity of the Exam (or any portion thereof) or upon the bases for such opinions;
- (3) If that person is performing and/or has performed work directly or indirectly for Nassau County (regardless of whether as an employee, an independent contractor, a consultant or an employee of a consultant), a complete description as to the terms and conditions governing the performance of such work;

- (4) That person's educational, professional and work background;
- (5) The title, subject matter, name and address of publisher, date of publication and Library of Congress number of each writing of that person which has been published;
- (6) The title, subject matter and date of completion of each writing of that person which has not been published;
- (7) The caption, number and location of filing of each case in which that person has testified as to any matter pertaining to the construction, use and/or validity of written examinations or other selection criteria, regardless of whether by affidavit, deposition or in open court; the dates of such testimony; the name and business address of the party on whose behalf such testimony was given; a description as to the substance of such testimony; and the identity of each attorney of record in that case; and
- (8) The name and business address of each government, governmental agency, legislative or judicial entity, corporation, company, partnership, business, union or association for whom that person has performed work (regardless of whether as an

employee, a consultant or an employee of a consultant) pertaining to the construction, use and/or validity of written examinations or other selection criteria, as well as:

- (a) The approximate dates during which such work was performed; and
 - (b) A description as to the nature of the work performed; and
- (9) A detailed description of each written examination and each validation study or report either authored by that person or to which that person contributed;

f. The identity of each document, either in the possession of Nassau County or of which it has knowledge, which:

- (1) Suggests, infers or concludes either that the 1983 Police Officer Exam or an examination like or similar to that Exam is not valid in accordance with Title VII and with the Uniform Guidelines; or
- (2) In any way questions whether the 1983 Police Officer Exam or an examination like or similar to that Exam is valid in accordance with Title VII and with the Uniform Guidelines;

g. The identity of each person known to Nassau County:

- (1) Who is and/or was of the opinion that the 1983 Police Officer Exam or an examination like or

- similar to that Exam is not valid in accordance with Title VII and with the Uniform Guidelines; or
- (2) Who in any way questions or questioned whether the 1983 Police Officer Exam or an examination like or similar to that Exam is valid in accordance with Title VII and with the Uniform Guidelines; and

h. A complete description of all efforts undertaken by, or at the direction or with the knowledge of, Nassau County to validate the 1983 Police Officer Exam in accordance with Title VII and with the Uniform Guidelines, including but not limited to:

- (1) The dates during which such efforts were undertaken;
- (2) The results of such efforts;
- (3) The planning, design and methodology followed, and analyses, findings, recommendations, criticisms, suggestions and comments made and all conclusions reached (whether partial or complete and whether preliminary or final) either as a result, or during the course, of such efforts to validate the Exam; as well as the precise bases for following such plan, design or methodology and for such analyses, findings, recommendations, criticisms, suggestions, comments and conclusions;
- (4) The identity of each document, and the identity of the custodian and exact location thereof, gene-

rated during the course of, or as a result of, such efforts to validate the Exam, including but not limited to: each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

- (a) The planning, design and methodology followed;
 - (b) All analyses, findings, recommendations, criticisms, suggestions and comments made;
 - (c) All conclusions reached (whether partial or complete and whether preliminary or final);
 - (d) The precise bases for such planning, design, methodology, analyses, findings, recommendations, criticisms, suggestions, comments and conclusions; and
 - (e) The relationship, if any, between level of performance on the Exam, or on any test item thereof, and level of job performance as measured by various criteria; and
- (5) The identity of each person who participated in such efforts to validate the Exam, as well as:
- (a) The precise role that person played in such efforts; the duties and responsibilities of that person in that role; and all analyses,

- findings, recommendations, criticisms, suggestions and comments made and all conclusions reached by that person in that role;
- (b) A description as to the business nature of that person's participation (e.g., as an employee of the County, as a consultant, as an employee of a consultant, etc.), as well as a description as to the terms and conditions of that person's participation; and
 - (c) That person's educational, professional and work background.

INTERROGATORY NUMBER 15

Set forth the name and business address of each government or governmental department, commission or agency other than Nassau County which has administered a written examination like or similar to the 1983 Police Officer Exam; and, for each government or governmental department or agency so identified, set forth:

- a. Each date the examination was administered;
- b. The distribution of scores by all persons who took the examination each time it was administered, by race, sex, national origin and any other demographic characteristic (e.g., level of education, place of residence, age, etc.);
- c. The impact of the exam, and each test item thereof (as the term "impact" is used in Paragraph 5 of the April 21, 1982

Consent Decree) by race, sex, national origin, and any other demographic characteristic;

d. The cut-off (i.e., passing) score (set forth both as a raw score and as a percentage) of the exam; and

e. Whether the exam was used:

(1) On a pass/fail basis; or

(2) On a rank-ordering of scores basis;

f. A complete description of all efforts undertaken by, or at the direction or with the knowledge of the government or governmental department, commission or agency which administered the exam, to validate the exam in accordance with Title VII and with the Uniform Guidelines including, but not limited to, the planning, design and methodology followed, all analyses, findings, recommendations, criticisms, suggestions and comments made and all conclusions reached (whether partial or complete and whether preliminary or final) either as a result of or during the course of such efforts to validate the exam; and

g. The identity of each person who conducted such efforts to validate the exam.

INTERROGATORY NUMBER 16

Identify each person who supplied any information for, or who participated in any way in the preparation of, the Nassau County defendants' answers to any of the interrogatories set forth above.

Respectfully submitted,



JOHN M. GADZICHOWSKI

MELISSA P. MARSHALL

ROGER A. COLAIZZI

Attorneys

Civil Rights Division

Department of Justice

Washington, D.C. 20530

202/633-2188

Counsel for plaintiff United
States

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

NASSAU COUNTY, et al.,

Defendants.

Civil Action No. 77-C-1881
FXA

REQUEST OF PLAINTIFF UNITED STATES FOR THE PRODUCTION
OF DOCUMENTS BY THE NASSAU COUNTY DEFENDANTS

Pursuant to Rule 34, F.R.Civ.P., plaintiff United States requests defendants Nassau County, Samuel Rozzi, Commissioner, Nassau County Police Department, Gabriel S. Kohn, Edward S. Witanowski and Edward A. Simmons, Commissioners, and the Nassau County Civil Service Commission (hereinafter collectively referred to variously as the "Nassau County defendants," "Nassau County" or the "County") to produce the following documents within thirty (30) days after the date upon which this Request is served.

It is requested that each of the documents produced by the Nassau County defendants in response hereto be organized and labeled to correspond to the particular Request and subsection thereof requesting its production.

DEFINITIONS

Unless a contrary meaning clearly appears in the context, the following definitions shall apply to this Request:

a. "Document" as used herein shall include:

- (1) Any paper or writing of any kind, including but not limited to: a report; study; analysis; memorandum; letter; telegram; calendar or diary; minutes; pamphlet; notes; chart; tabulation; press release; published book, article, treatise or paper; photograph; accounting entry; accountant's work paper; receipt; voucher; agreement; contract; financial statement; recording of minutes, conferences, and telephone or other communications;
- (2) Any draft of any document as defined in Paragraph a(1), supra;
- (3) Any alterations, notes, comments or other material not included in the original of any document as defined in Paragraph a(1), supra; and
- (4) The data base and all output, either in printed or machine-readable form, of any computerized data recording, storage, analyzation and retrieval system (e.g., tapes, punch cards, microfilm, printouts), as well as the written information necessary to understand and use such data base or output.

b. "Identify" or "identity" when used with respect to a person means that person's:

full name and complete address of its custodian;
and

- (3) If such document has been published, its title, author, date and place of publication, name of publisher and Library of Congress number.

REQUEST NUMBER 1

A copy of the Police Officer examination which Nassau County administered or caused to have been administered in December 1983 (the "1983 Police Officer Exam" or the "Exam"); a copy of each draft thereof; and a copy of each tentative, as well as the final, scoring key for the Exam.

REQUEST NUMBER 2

A copy of each document, including but not limited to informational, instructional or study manuals, booklets or other materials, which were distributed among or used to instruct, tutor or prepare candidates for the 1983 Police Officer Exam prior to the administration of the Exam.

REQUEST NUMBER 3

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to the purpose, planning, design, formulation, construction, administration or grading of the 1983 Police Officer Exam.

REQUEST NUMBER 4

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. The precise role played by each person who participated in the planning, design, formulation, construction administration or grading of the 1983 Police Officer Exam; or

b. Such person's educational, professional or work background.

REQUEST NUMBER 5

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. How the cut-off (or passing) score for the 1983 Police Officer Exam was formulated;

b. The precise bases for that cut-off score as opposed to either a higher or a lower cut-off score;

c. The precise role played by each person who participated in the formulation and establishment of that cut-off score;

d. The precise bases for dropping each test item which was dropped when scoring the Exam; or

e. The precise role played by each person who participated in the determination to drop each test item which was dropped when scoring the Exam.

REQUEST NUMBER 6

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. The distribution of scores achieved by all persons who took the 1983 Police Officer Exam, by race, sex, national origin and any other demographic characteristic (e.g., level of education, place of residence, age, etc.);

b. The impact of the Exam, and each test item thereof (as the term "impact" is used in Paragraph 5 of the April 21, 1982 Consent Decree) by race, sex, national origin, and any other demographic characteristic; or

c. The name, sex, race (e.g., white, black), national origin (e.g., Hispanic), rank, date of appointment, name of command, method of selection, date of administration and score achieved by each incumbent Nassau County Police Department ("NCPD") sworn officer who was administered the 1983 Police Officer Exam or one like or similar to it.

REQUEST NUMBER 7

For each subsection (e.g., a.(1), b.(2), etc.) of Interrogatory Number 6 of the accompanying Interrogatories of Plaintiff United States to the Nassau County Defendants which is answered in the negative by Nassau County, each document upon which the County relies, in whole or in part, as a basis for such answer.

REQUEST NUMBER 8

Each document, whether in the possession of Nassau County or of which the County had knowledge prior to the administration of the 1983 Police Officer Exam, which set forth, reflected, pre-

dicted, cautioned, discussed or in any way commented upon the possibility that the 1983 Police Officer Exam, or an examination like or similar thereto, would have an adverse impact upon blacks, Hispanics or women.

REQUEST NUMBER 9

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to the efforts, if any, undertaken by, or at the direction or with the knowledge of, Nassau County to lessen the adverse impact of the 1983 Police Officer Exam upon blacks, Hispanics or women.

REQUEST NUMBER 10

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. The efforts, if any, undertaken by, or at the direction or with the knowledge of, Nassau County since January 1, 1980 in considering, evaluating or determining the suitabilities of various criteria or devices for the selection of applicants for police officer in the NCPD;

b. Each such criterion or device, the suitability of which was considered, evaluated or determined;

c. Each and every reason why such criterion or device, if other than the 1983 Police Officer Exam, was not used; and

d. Each and every reason why the 1983 Police Officer Exam was used instead of one or more of the other criteria or devices.

REQUEST NUMBER 13

Each document, either in the possession of Nassau County or of which it has knowledge, which:

a. Suggests, infers or concludes either that the 1983 Police Officer Exam or an examination like or similar to that Exam is not valid in accordance with Title VII and with the Uniform Guidelines; or

b. In any way questions whether the 1983 Police Officer Exam or an examination like or similar to that Exam is valid in accordance with Title VII and with the Uniform Guidelines.

REQUEST NUMBER 14

Each document which sets forth, reflects, analyzes, criticizes, discusses or in any way comments upon the opinion of each person known to Nassau County that:

a. The 1983 Police Officer Exam or an examination like or similar to that Exam is not valid in accordance with Title VII and with the Uniform Guidelines; or

b. In any way questions whether the 1983 Police Officer Exam or an examination like or similar to that Exam is valid in accordance with Title VII and with the Uniform Guidelines.

REQUEST NUMBER 15

Each document generated during the course of or as a result of all efforts undertaken by, or at the direction or with the knowledge of, Nassau County to validate the 1983 Police Officer

Exam in accordance with Title VII and with the Uniform Guidelines, including but not limited to each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

- a. The dates during which such efforts were undertaken;
- b. The results of such efforts;
- c. The planning, design and methodology followed;
- d. All analyses, findings, recommendations, criticisms, suggestions and comments made;
- e. All conclusions reached (whether partial or complete and whether preliminary or final);
- f. The precise bases for such planning, design, methodology, analyses, findings, recommendations, criticisms, suggestions, comments and conclusions;
- g. The relationship, if any, between level of performance on the Exam, or on any test item thereof, and level of job performance as measured by various criteria; and
- h. The precise role that each person who participated in such efforts to validate the Exam played in such efforts; the duties and responsibilities of that person in that role; and all analyses, findings, recommendations, criticisms, suggestions and comments made and all conclusions reached by that person in that role; as well as:

- (1) The business nature of that person's participation (e.g., as an employee of the County, as a consultant, as an employee of a consultant, etc.), as well as the terms and conditions of that person's participation; and
- (2) That person's educational, professional and work background.

REQUEST NUMBER 16

A copy of each written examination like or similar to the 1983 Police Officer Exam which has been administered by or for any government or governmental department, commission or agency other than Nassau County; and for each such examination, each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. The distribution of scores by all persons who took the examination each time it was administered, by race, sex, national origin and any other demographic characteristic (e.g., level of education, place of residence, age, etc.);

b. The impact of the exam, and each test item thereof (as the term "impact" is used in Paragraph 5 of the April 21, 1982 Consent Decree) by race, sex, national origin, and any other demographic characteristic;

c. The cut-off (i.e., passing) score (set forth both as a raw score and as a percentage) of the exam;

d. Whether the exam was used:

(1) On a pass/fail basis; or

(2) On a rank-ordering of scores basis;

e. All efforts undertaken by, or at the direction or with the knowledge of the government or governmental department, commission or agency which administered the exam, to validate the exam in accordance with Title VII and with the Uniform Guidelines including, but not limited to, the planning, design and methodology followed, all analyses, findings, recommendations, criticisms, suggestions and comments made and all conclusions reached (whether partial or complete and whether preliminary or final) either as a result of or during the course of such efforts to validate the exam; and

f. The identity of each person who conducted such efforts to validate the exam.

Respectfully submitted,


JOHN M. GADZICHOWSKI
MELISSA P. MARSHALL
ROGER A. COLAIZZI
Attorneys
Civil Rights Division
Department of Justice
Washington, D.C. 20530
202/633-2188

Counsel for plaintiff United
States

CERTIFICATE OF SERVICE

I, JOHN M. GADZICHOWSKI, hereby certify that copies of the foregoing Interrogatories of Plaintiff United States to the Nassau County Defendants, as well as Request of Plaintiff United States for the Production of Documents by the Nassau County Defendants, were served this 21st day of June 1984 by Federal Express upon the following counsel:

James M. Catterson, Jr., Esquire
314 Main Street
Port Jefferson, New York 11777

William H. Pauley III, Esquire
Orenstein, Snitow & Pauley, P.C.
750 Third Avenue
New York, New York 10017


JOHN M. GADZICHOWSKI
Senior Trial Attorney
Civil Rights Division
U.S. Department of Justice
Washington, D.C. 20530
202/633-2188