

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

_____)	
MARIELLE (“MOLLY”) KRONBERG,)	
)	
Plaintiff,)	
)	
-v-)	
)	Civil No. 1:09-cv-00947-AJT-TRJ
LYNDON LAROUCHE, et al,)	
)	
Defendants.)	
_____)	

**DECLARATION OF MOLLY KRONBERG IN SUPPORT OF HER MOTION
TO RECONSIDER OR TO CERTIFY FOR INTERLOCUTORY APPEAL
THE ORDER DISQUALIFYING ATTORNY JOHN MARKHAM**

MOLLY KRONBERG declares under penalties of perjury as follows:

(1) I am the plaintiff in this action and, based upon matters known personally to me, I make this declaration in support of my motion to have this Court either reconsider or certify for interlocutory appeal its order disqualifying my attorney, John Markham.

(2) Not long after my husband committed suicide and the LaRouche publications commenced publicly taunting me about it by saying that my perjury caused him to take his own life, I attempted to locate a lawyer to advise me of my rights.

(3) The first several firms I contacted were not interested in taking the case.

(4) On February 23, 2009, I first contacted attorney Markham about this problem. After listening to my concerns about what was occurring, he suggested that I contact the U.S. Attorney’s Office in Alexandria, Virginia to file a complaint or at least to seek help. I did so, speaking to someone who indicated that the FBI would be the place to start an investigation; this individual suggested that I call the Regional Field Office of the FBI.

(5) I telephoned the FBI Field Office at 202-278-2000 (Washington, DC) and spoke to Duty Agent Mike (he did not give me his full name). He listened to my concerns about these attacks on me and how they might escalate. He advised me to retain a private attorney.

(6) I had already begun to approach law firms about taking my case before I spoke to the FBI. I continued with my search. I discussed this matter with various firms, small and large, both in Virginia and outside the state. None wanted the case. I went back to Mr. Markham, who finally agreed to take it after extensive discussion and research on his part.

(7) Mr. Markham explained the need to have local counsel. We searched; it was difficult to find someone to fill that role. After considerable searching for someone willing and able to play that role, we located attorney John Bond, who expressed a willingness to play the role of local counsel, but not to be lead counsel and not to be lead trial attorney.

(8) If Mr. Markham remains disqualified, I will be forced to proceed with this case pro se. Mr. Markham had arranged a fee structure that permitted me to have him and a local counsel—and, given Mr. Markham's arrangements with me, and his willingness to undertake the bulk of the work involved under that arrangement, Mr. Bond was willing to come on board in the role of local counsel. He will not be able to take over the role of lead counsel for reasons that could be explained to this court *in camera*, because they are privileged, having nothing to do with the facts or merits of the case, but having to do with matters between attorney and client.

(9) Now that I am widowed, I am a single parent putting a son through Yale Divinity School. I do not have, and never have had, outside the fee structure offered by Markham, the resources to retain a lead counsel of the kind that would have, and would be willing to use, the resources to take on the very experienced counsel arrayed against me now. This is particularly so because the defendants' team includes lawyers whose firms have represented the LaRouche organization for a long time, most notably Odin Anderson, who was lead counsel for LaRouche in the Boston prosecution of 1988, lead counsel for him in the Alexandria prosecution of 1988, and the counsel for LaRouche who met with the other lawyers and defendants, including my lawyer and me, in connection with the 1989 New York prosecution in which I was a defendant. One of the occasions on which Odin Anderson was present in the courtroom during my trial was the occasion on which Lyndon LaRouche testified for the defense. Indeed, in March 1989, on the eve of the New York trial, Odin Anderson expressed interest in being my lawyer in the New York case.

Moreover, Barbara Boyd, one of the defendants in the present case, was a paralegal in the Boston, Alexandria, and New York cases. Indeed, I roomed with her for six months during the 1989 prosecution in New York. She was involved in preparing me to testify in the New York case, and drew on my Alexandria grand jury transcript to do so.

(10) In that connection, based on my 34-year experience with the organization's recordkeeping practices, I can aver that it retains records and particularly legal records. I, on the other hand, have no records concerning the Boston case and only a few concerning my case in New York—and I do not even have a copy of my own grand jury transcript in the Alexandria case. The defendants have that transcript and have had it for decades.

I declare under penalties of perjury that the foregoing is true and correct.

Executed this 16 day of April, 2010 in Leesburg, Virginia.


Marielle (Molly) Kronberg