

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

MARIELLE ("MOLLY") KRONBERG,)

Plaintiff,)

-v-)

LYNDON LAROUCHE, et al,)

Defendants.)

Civil No. 1:09-cv-00947-AJT-TRJ

**DECLARATION OF CRITON ZOAKOS ADDRESSING CERTAIN MATTERS
ASSERTED IN LAROUCHE'S MOTION TO DISQUALIFY JOHN MARKHAM**

CRITON ZOAKOS, declares, under penalties of perjury, as follows:

1. I am a resident of the Leesburg, Virginia area, a former member of the National Caucus of Labor Committees (LaRouche's organization) and based upon matters known to me, I make this declaration setting forth facts known personally to me.

2. Contrary to the assertions of Barbara Boyd in her affidavit, filed in this matter at Docket No. 26-2, I was a legal permanent resident with a green card since 1969 and never had any problems with the Immigration Service and I have since obtained citizenship. There has never been a deportation proceeding against me.

3. I was a member of the LaRouche organization until March, 1988, now 22 years ago. I left the organization out of my profound disillusionment with the organization and Mr. LaRouche, deciding to do so before I ever met Mr. John Markham.

4. The first and only time I met Markham while he was a federal prosecutor was sometime in early 1988, after I had left the LaRouche organization. We met for approximately 30 minutes during which he asked me if I had any knowledge of whether

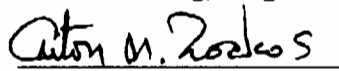
Mr. LaRouche had ordered three LaRouche organization members (then fugitives) to leave the country. I told him that I had never heard him do so nor did I hear anyone else say that he had done so. I speculated that if LaRouche had wanted the fugitives to leave the country, he would probably have simply expressed his wish in that regard and someone would have seen that it was done. Mr. Markham indicated that this was not evidence that he could use. This was the extent of the conversation. There was no other government person with Markham during this conversation which took place in my living room.

5. I never saw Markham again until 22 years later in the summer of 2009 when he came to the Leesburg area to meet with Molly Kronberg and others. He has not asked me to be a witness in this case brought by Molly Kronberg. I have no personal knowledge of the matters at issue.

6. Mr. Markham never attempted to create any animus in me against Mr. LaRouche or his organization. He simply asked questions about him during the short meeting I had with him. By the time I met Markham in 1988, my opinion of Mr. LaRouche had been firmly set by my many years of observing his actions and listening to him.

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

Executed this 20 day of December, 2009 in Leesburg, Virginia.


Criton Zoakos