

Memorandum

1. (also #4). The undersigned's work in the field of archaeology went far beyond mere interest. In Russia the undersigned was member of the Imperial Russian Archaeological Society, Honorary Member of the Imperial Moscow Archaeological Institute and lecture on archaeology at the Imperial Archaeological Institute of St. Petersburg.

Reports of his excavations in North Russia have appeared in the Journal of the Imperial Russian Archaeological Society (Section of Russian and Slavonic archaeology). In 1910 the undersigned conducted excavations of the Novgorod Kremlin on behalf of the Museum of Pre-Petrian Art, of which he was President. The undersigned is Member of the Société Préhistorique (Paris), of the Société des Antiquaires (Paris), of the Academy of Rheims, Société d'Ethnographie (Paris), of the Royal Asiatic Society of Bengal. The undersigned possessed the largest private prehistoric collection in Russia.

#8. The undersigned possesses a series of newspaper clippings from several countries outside of the USA, showing how widely the slanderous story was circulated. It is to be noted that other news agencies, such as Reuters and the Associated Press had instructed their representatives abroad to abstain from publishing the story, because of its slanderous character.

#11. Neither the undersigned, nor any of the members of his party had any difficulties with Japanese military authorities while engaged in field work in Manchuria. All of the undersigned's actions were taken with full knowledge of Secretary Wallace. The undersigned was never regarded as a spy by Manchukuo officials, and the expedition in Manchuria was never curtailed or deported. The defendant's information must be based on an entirely false and unverified source. The undersigned was never engaged in any political work, either before the Mongolian expedition, or afterwards, and the allegations of political activities must have originated from a malicious source responsible for the whole intrigue, the origin of which we are now trying to discover.

#12. The expedition experienced no difficulties with authorities in China, who on the contrary have been extremely helpful. The expedition had no "White Russian bodyguard" in its service. The staff consisted, outside of the undersigned and of Mr. G. de Roerich, of two Chinese botanists, one assistant in charge of supplies, one botanical collector, and two drivers. Four of the assistants were former Russians and two of them were naturalized Chinese citizens.

#13. We have no evidence to this effect. Since the appearance of the slanderous newspaper story of January, 1936, circulated in the American Press and distributed by the United Press abroad, we have tried to investigate these alleged "informal protests" said to have been received by the Department of Agriculture, and must state here that so far we were unable to locate any of them. The Department of Agriculture in all its correspondence with the undersigned or his son, Mr. G. de Roerich, never mentioned such "informal protests". The letter of the Japanese Foreign Office, dated February 14, 1935 and the open letter of Prince Teh Wang which appeared in the North China Star of Sept. 21, 1935 (copy enclosed) prove on the contrary a complete absence of suspicion towards the expedition. The defendant must prove the existence of such informal protests and state the source of their information.

#14. The undersigned was never informed of his discharge by the Department of Agriculture and cause was never stated either in writing or verbally. The undersigned, while engaged in field work in Inner Mongolia, received from the Department of Agriculture a cable dated Aug. 21, 1935, recommending the transfer of the expedition to the Kuku-nor area. As this was impossible due to the political situation in the area and because of late season, the undersigned advised the Department of the impossibility to carry out the Department's recommendation by cable dated August 24th 1935. The Department realizing the impracticability of such a transfer instructed the undersigned to return to Peiping and from there to proceed to India where seed collecting was being carried out under instructions of the Department. The work in India was to be completed by February 1st, 1936. The defendant's information is incomplete and omits to mention the transfer of the expedition to the Kuku-nor Province, which recommendation could not be carried out by the undersigned on account of the adverse situation in Kansu and the Kuku-nor region. Neither the undersigned, nor his son, had any intention of being re-employed by the Department of Agriculture.

#16. The undersigned, nor any other member of his party was never under arrest or deported in Chinese Turkestan, and the information secured by the defendant is clearly based on a malicious distortion of facts. Most of the scientific expeditions engaged in field work in Central Asia experienced difficulties of some sort: for example the Trinkler expedition to Chinese Turkestan, Sir Aurel Stein's expedition to Chinese Turkestan who had his passport withdrawn and had to abandon his plans of exploration, Dr. Sv. Hedin's recent expedition to the same area, during which Dr. Hedin was detained for several months. While the undersigned's expedition was detained at Chu-na-khe, Nag-chu-ka in Tibet (not arrested or detained in custody as stated by the defendant), Dr. Filchner's expedition was detained in the same area and under similar conditions. Dr. Filchner's party consisted of an American missionary and of a British subject. The detention of an expedition cannot be considered as proof of political activity by its members. This paragraph of the defendant's answer must have been drawn by persons totally ignorant of local conditions under which scientific expeditions have to work. The attached copy of the official letter of the Tibetan Government, dated October 1928 (the sixth day of the Tibetan ninth month of the Earth-Dragon year) makes it clear that the said Government neither arrested the expedition nor detained in custody as implied by the defendants.

#17. The undersigned never made any statements of a political nature, and was never a member of any political party.

#18. While the undersigned experienced delays in securing his return visa to India in 1930, it was not because of alleged pro-Soviet attitude. The New York Times of July 18, 1930 did state that the British Government regarded the undersigned as pro-Soviet, but this was subsequently denied by the Foreign Office, London, as can be seen from the attached copy of Mr. S. Gazelee's letter to Mr. G. de Roerich of July, 1930. The undersigned received his visa to India in December 1930.

#20. The undersigned came to the United States on an invitation from the Chicago Art Institute which institution arranged a tour through forty cities for the exhibition of the undersigned's paintings.

#21. The undersigned was never instructor of painting. In 1921 he founded together with Mr and Mrs M. Lichtmann an art school known as the Master School of United Arts which was located at 312 West 54 Street, New York, and of which he was elected President.

#22 The undersigned was internationally known as an artist and writer long before his arrival to the USA in 1920. In 1915 he was feted on the occasion of 25 years of his artistic and cultural work. The majority of monographs dedicated to his art have been published prior to his arrival to the USA and prior to his meeting of Louis Horch, a New York broker, who was introduced to him by Miss Frances R. Grant.

#23 The undersigned was always interested in philosophical thought and in psychic research, as in every other science for the advancement of human knowledge.

#24. All of the undersigned's books are signed by his name and a list of them can be produced.

#25. Not the undersigned caused the inauguration of the Museum, but as stated in official publications & said by L. Horch himself, a group of American citizens interested in the undersigned's art, founded the Museum in honour of the undersigned.

#27. The funds for the expedition were supplied by the Museum of which L. Horch was a donor. There were no reasons to ask the State Departments permission to leave British India, as this was an expedition which never intended to reside permanently in any place, and moreover that the necessary permission for the trip to Leh and the crossing of the Indian border to Chinese Turkestan were obtained through direct negotiations with the British authorities in India.

#28. The attitude of the Khotan authorities is typical of the official attitude to all foreign expeditions visiting Chinese Turkestan. The baggage of the Expedition was examined by the Customs and the statement that the expedition's house was searched is a mix malicious distortion of facts. The expedition's arms were subsequently returned to the expedition and prior to its departure from Khotan. The expedition was never placed under arrest.

#30. The guard of soldiers referred to in the paragraph was an escort given to all expeditions travelling in the area. The expedition was never expelled from Kashgar and the defendants will have to show cause for their incorrect statement of facts. The expedition was never engaged in topographical work and had no topographer on its staff. The expedition was not forbidden to visit places of interest. The expedition was not sent through the desert, but travelled along the northern caravan route and received assistance from local Chinese officials.

#31. The expedition headquarters were never searched by police at Urumchi & the local Governor and members of the Provincial Govt feted the undersigned & his party. Because of the state of war in Kansu, the expedition had to journey further to Mongolia and Tibet through the USSR.

#33. The undersigned has to state again that he never was engaged in any kind of political work. His only interest being the promulgation of goodwill among nations through cultural work.

#34. This communication must have been based on the undersigned's intention to visit Abyssinia at a later date. Members of the undersigned's family had previously visited Abyssinia as members of official missions sent by the Imperial Russian Government. Being on expedition it was difficult to control the press.

#35. The painting presented to the Government of the Mongolian Republic depicts the King of Shambhala, & was drawn according to Tibetan iconography. The painting was subsequently reproduced in the Paris art periodical Revue du Vrai et du Beau, Sept. 1929. p. 11.

#36. The book in question is not written by the undersigned, all of whose books are always signed by his name.

#37. As stated above the undersigned's expedition was detained at Nagchuka, Tibet but never arrested or detained in custody, as can be seen from the attached letter of the Tibetan Government. Nagchuka is the usual place for stopping caravans coming from the north. Dr. Filchner's expedition was similarly detained at Nagchuka and then permitted to proceed to India by the long route through Ladak & Kashmir.

The undersigned's expedition was on the contrary permitted to proceed to India via Nag-tshang and the Tsang Province of Central Tibet, which is a much shorter and direct route to India and in parts coincided with the route followed by the Everest expedition. The detention in mid-winter caused great hardships but at no time was there any question of arresting members of the expedition's staff or interfering with their freedom. The detention at Nagchuka has been the fate of all expeditions coming from the Kuku-nor area.

#38 As stated above the Museum was founded by a group of American citizens and the Museum building was erected by decision of the Museum board. L. Horch always stated that the institution had long outgrown its previous quarters and needed larger premises on a self-supporting basis.

#40 The Times statement of July 18th, 1930 to which the para refers, has been denied by the Foreign Office, London. See attached letter.

#41. This paragraph misrepresents facts. The undersigned was promoting the protection of artistic and cultural treasures already since 1904. In Russia he published a number of articles which were printed in Russian daily papers and in the art monthly "Starye Gody" and was a member of several government commissions entrusted with the preservation and restoration of Russian artistic treasures (ex. the Commission on the restoration of the St. Basil Cathedral in Moscow). In 1914 he presented a plan for the preservation of artistic treasures in times of war and national upheavals to the late Emperor Nicholas II and the Grand Duke Nicholas, Commander-in-Chief of the Russian Armies. After the undersigned's return from the expedition in 1929, he published an open letter about the Pact in the N.Y. Times & personally launched a campaign for the adoption of the Roerich Pact and which he later continued in England and continental Europe and which resulted in the two International Conferences held in Bruges both prior to its being actively taken up in the United States. It may be added here that America was not officially represented at these two Conferences and that these conferences were not attended by members of the Museum administration in New York.

#46. The undersigned never induced Secretary Wallace to engage his son Mr. G. de Roerich, who was invited by the Secretary to accompany the expedition in the capacity of Mongolian and Tibetan expert.

#47. The information given in this paragraph about the salary of Mr. G. de Roerich is incorrect. A tentative budget for the expedition was given by Mr. G. de Roerich in his letter to Secretary Wallace dated March 22nd, 1934, and therein his salary was calculated at U.S. \$ 4,600 a year. The particle "de" is commonly attached abroad to Russian family names belonging to the former nobility. This practice was observed in all official documents prior to the Russian Revolution of 1917 and is still observed in France and elsewhere, as can be seen from the attached letter from the Foreign Office, London. The French particle 'de' corresponding to the German and Baltic 'von' has been always used in connection with the undersigned's name in foreign official documents (see attached photo of the certificate of the Royal Swedish Order of the Northern Star).

#49. The undersigned's departure from the USA and arrival in Japan took place according to schedule, established during the conversation with Sec. Wallace & other officials of the Department of Agriculture.

#50. The statement contained in this paragraph is entirely wrong. The undersigned accompanied by Mr. G. de Roerich visited the U.S. Ambassador Mr. J. C. Grew on their arrival to Tokyo and had a conference with him during which the Ambassador told them that "because of the very delicate situation with the new state in Manchuria, it was better for the undersigned to use his personal connections in negotiations with local authorities". This interview was reported to the Department of Agriculture in the undersigned's report dated October 24th, 1934. The U.S. Ambassador & other members of the Embassy were present at the luncheon arranged in honour of the undersigned by the Japan-America Society. Throughout his stay in Japan the undersigned was treated as a guest of the Japanese Govt and was even given free passages on Japanese railways & the use of govt cars while in Tokyo. During his stay in Japan the undersigned made no political statements & it is therefore wrong to describe his stay as an embarrassment to the United States.

#51. All of the undersigned's actions in Japan in connection with matters pertaining to the expedition 'his address on Culture has received full approval of Secretary Wallace who in a letter dated Sept. 27th 1934 wrote: "I was delighted to learn through articles in the Japanese and Manchurian press which were brought to my attention here of the splendid reception which you have received both in Japan and Harbin. I am not surprised since I am well aware of the high regard in which you are held there. Permit me to congratulate you for these tributes to your great personal accomplishments". This passage completely dismisses all allegations contained in the defendant's statement. The interview with the Japanese War Minister was essential in order to obtain the cooperation of the army authorities (Manchuria being under military occupation), was in the interest of the expedition, & had no political character. As can be seen from newspaper reports, both the Minister & the undersigned carefully abstained from matters which could be interpreted as political. Thanks to this interview, the Japanese army authorities in Manchuria placed no obstacles in the path of the expedition, though previously to this, they had refused permission to Dr. Andrews to continue his research work in eastern Mongolia. It may be added here that in May, 1934, a number of prominent American citizens have called on the War Minister in Tokyo and such action was not considered detrimental to the interests of the United States.

#53. This paragraph deals with matters which were of no concern to the expedition which was of a purely scientific character. It may be only stated here that notwithstanding the nonrecognition of the new state in Manchuria by the United States American Consuls and private citizens continued to reside in the country and negotiate with local authorities, this recognizing the change that had taken place in the three ~~Inner~~ North-Eastern Provinces of China.

#54. The undersigned was never informed of Mr. Macmillan's delay in leaving the USA and the first cable about Messrs Macmillan and Stephen was received by him on June 3rd addressed to Harbin, Manchuria, which proves that the Department expected him to be by that date in Harbin.

#55. The situation which had been created by the refusal of Mr. Macmillan to follow the undersigned's instructions as leader of the expedition, has been fully described in our report covering the period from Apr. 28, 1934 to Aug. 1934. (see rep.)

#56. American representatives never informed the undersigned of this alleged embarrassment and no American official ever mentioned it, though the undersigned has on several occasions met the Amer. Consul in Harbin & the U.S. Minister in China.

#57. The audience with the Emperor of Manchukuo had no political character & on the contrary facilitated the field work of the expedition. The defence of artistic & scientific treasures does not belong to the political domain, as it is the duty of every cultured man. This paragraph implies that the undersigned carried on a correspondence with persons in the USA concerning certain of his plans which were wholly unconnected with the expedition. While failing to understand the meaning of this statement, the undersigned takes that this refers to a proposal to establish a cooperative society for the cultural and economic upliftment of the local population of North Manchuria and adjoining Mongolia. The programme of such a cooperative was forwarded to the undersigned before his departure from the United States and was communicated by him to Sec. Wallace, who not only expressed his interest in the project but even invested a sum of money to help the said cooperative. The cooperative had no political character whatsoever and it was thought that it may have an economic interest as an outlet for American produce. Sec. Wallace's interest in cooperative movements is evidenced by his latest book on the subject. Incidentally it may be stated here that agricultural explorers sent out on foreign missions by the Dept. of Agriculture not only report on matters connected with their scientific research but also are supposed to report on various economic questions of interest to the Department. The undersigned, prior to his departure from the USA was requested to report to the Dept. on cattle-breeding in Manchuria & Mongolia, & the question was even considered to import Mongol horses to the USA. At a later date while conducting field work in Mongolia, the undersigned was asked about the possibility of securing a live musk-deer for the Dept. The expedition's report includes a whole chapter on cattle & horse breeding in Mongolia. The paragraph also

implies political activities on the part of the undersigned's brother, resident of Harbin. This malicious invention is hard to explain. My brother, an agriculturist by education was never engaged in any sort of political activity, neither in Russia, prior to the revolution, nor afterwards in Manchuria, where he was employed by the Chinese Eastern Railway and by the firm Tshurin & Co, as agricultural expert.

#58 The Hailar events have been fully described in our report & need not be repeated here. The expedition had no White Russian bodyguard, the arms of the expedition consisted only of two revolvers, one rifle with 20 rounds of ammunition, and one shotgun, belonging to the undersigned and Mr. G. de Roerich. The staff consisted, besides the undersigned and Mr. G. de Roerich, of Prof. T. Gordeev, botanist, two botanical collectors, one cook and one camp servant. The expedition was accompanied by the Japanese Secretary and by an officer deputed by the Hailar authorities. While Messrs Macmillan & Stephens were not permitted to proceed further than Hailar, the undersigned and his party were permitted to carry out their research work in Barga. The defendant seems to imply that it was a political crime to employ Russian on the staff of the expedition. Previous expeditions sent by the Dept. of Agriculture to Manchuria employed Russian camp followers and this was never put against them. North Manchuria has a large population especially along the Chinese Eastern Ry. The whole anti-Russian tone of the defendant's statement should be noted, as it is incompatible with the traditional friendship which existed between the U.S. & Russia regardless of political creeds. The same paragraph states that the memorandum presented by the undersigned to the Hainking authorities included among others, archaeological the study of local customs of the people. This is again entirely wrong for the submitted programme did not include archaeology, which by the way is not permitted in Manchukuo territory.

#59. Sec. Wallace recalled Messrs Macmillan & Stephens because of unsubscription (see the Sec's cable marked Harbin 1.2.21 and his letter of Sept. 27, 1934).

#60-74 These paragraphs refer to the malicious newspaper campaign started by two Japanese Russian language rally papers in Harbin. The statements made in these papers are too ridiculous to merit a denial. The reputation and methods of these two papers are too well known and it is surprising that the defendant should take them seriously. The paper "Nash Put" rendered as "Our Way" in the defendant's statement is the organ of the Japanese supported so-called Bashist party in Harbin. The "Harbin Times" is a Japanese daily registered in the Japanese Consulate at Harbin and published by a reactionary Japanese group. Its editor is a Mr. Tanaka who is assisted by a Russian editor. Both newspapers are violently anti-American and anti-Soviet (which often means anti-Russian regardless of political colour), and recently made it a point to slander and discredit the names of prominent Russian personalities, visiting or residing in the Far-East. Besides the undersigned they have attacked a number of well-known & respectable persons such as H.E. H.J. Gondatti, the former Governor-General of the Amur Province, Prof. G. Gins, a well-known scholar & former member of the Russian Government under Admiral Kolchak, the Metropolitan Sergius, Head of the Orthodox Church of Japan and the great Russian singer Shaliapin, who has since issued a statement of his experience in Harbin, which was printed in the Russian Paris paper, and a clipping of which was sent to N.Y. The undersigned has to state that prior to the beginning of the above-mentioned campaign, the newspaper "Our Way" asked the undersigned to contribute Five Hundred Mexican dollars to their political fund, which the undersigned of course refused, with the immediate result that the said paper started a violent campaign against the undersigned, accusing him of being a prominent mason working in the interest of American capital & International Jewry. The defendant, while quoting from the above papers, omitted some of the most colourful "accusations", that the undersigned was an antichrist, that the undersigned and his associates were partaking of human flesh (sic) and that the undersigned was the head of the Binintern (Financial International) with headquarters in America and head of the Comintern! These grotesque inventions concocted by a group of renegade persons are enough to prove the value of these newspaper reports with which the defendants attempt to defend themselves. Similar attacks were periodically made against foreign, American firms and the YMCA in Harbin. These malicious statements have been since denied by a letter of the Japanese Foreign Office, dated Feb-14, 1935, and which appeared in the Russian daily paper

"Novaya Zarya" in Tientsin, in Harbin Russian papers and in the Peking Chronicle. The defendant should have known this letter before quoting slanderous statement published by the Harbin papers.

#75. This paragraph states that the expedition left Harbin without waiting to arrange & ship the collections to the Dept. of Agric. This is not true. The collection could not have been sent before the expedition's departure due to the fact that Prof. Gordeev, who remained in Harbin, was studying them and making identifications. On the completion of his work, the collections were duly forwarded to the Dept. The large collections of seeds and herbarium material collected in Inner Mongolia had been all forwarded from Peiping under the personal supervision of the undersigned and prior to his departure from China. All these collections have been received by the Dept. This paragraph again tries to imply that the expedition was accompanied by an armed force of Russians who had theretofore military training. Russia being a country with compulsory military training it is even difficult to find an able-bodied Russian who did not serve in the army or had at least military training in one of the colleges where such training formed part of the programme. The staff of the expedition consisted of three young men, two of them being naturalized Chinese citizens, who were born in 1904, 1908 and 1911, and thus were much too young to participate in the Great War or in the Civil War in Russia. The second assistant in charge of supplies was an ex-colonel of the Imperial Russian Army who was for several years a school teacher in Harbin. The defendant again seems to imply that it was a political crime to engage Russians, apparently ignoring the fact that Russians form part of the local population of Manchuria, that they are commonly employed throughout the Far East by foreign firms and governmental institutions, that the Tientsin foreign police largely consists of Russians and that the Shanghai Volunteer Corps includes a whole Russian regiment, paid and equipped by the British Municipality of Shanghai.

#77. This entire paragraph must be based on a misunderstanding of some sort. The undersigned fails to see any political implication in the words of the Deloba Gegen who is alleged to have visited the American Minister in Peiping. It is entirely untrue to state that the expedition had frictions with Prince Teh Wang and the Minister must have misunderstood the words of the representative. The letter of Prince Teh Wang published in the North China Star, Tientsin, Sept. 21, 1935, referring to an article which appeared in the said paper on July 23 and which curiously enough repeated the above statements alleged to have been made by the American Minister in China, completely refutes all statements about difficulties in Mongolia. In April 1935, the expedition possessed only one riding horse and hired a car from Mr. Larson, a former Swedish missionary engaged in trading in Mongolia. With six men, one horse and one second-hand car it was difficult to put up a "fierce appearance" and impress warlike Mongols who are not easily intimidated!

#80. The article referred to in the paragraph of the defendant's answer was written by a John Powell, Editor of the China Weekly Review of Shanghai, who passed through Kalgan in June 1935. In his article John Powell stated that he obtained some of his information from an American lady Mrs. Larson, married to a former Swedish missionary, resident in Kalgan. On receiving a clipping of the above statements she is said to have made to newspaper correspondents and which contained false information. In answer to this, the undersigned received the following letter: "Dear Prof.

Roerich, I inadvertently heard something had been in a Manila paper of a remark I made - it looked so discourteous, I feel quite badly about it. Someone quoted me as saying the "Roerich party ate a great deal and were always busy". I probably did say it for I was often surprised at the way food disappeared but I said it in a joking way - and it was not very nice to have it put in a paper. I never felt that you underpaid for anything you used, in fact you were always so courteous about any bills. Please pardon me for those words, I would not intentionally be unkind. We would be glad to see you any time if you come this way. Very sincerely (signed)

M. Larson. Dated Aug. 13, 35" - The above letter shows on what sort of information John Powell's articles were based. In his articles John Powell freely quoted officials from the United States Legation in Peiping. I know that surprise was expressed among the foreign colony in China that he was permitted to quote statements alleged to have been made by Legation officials, thus breaking the traditional attitude of neutrality prescribed to diplomats.

#84. The statement alleged to have been made by a Soviet citizen or official to an American official stationed in Moscow strangely coincides with the reports that appeared in the Chicago Daily Tribune of June 25, 1935, the North China Star and other American papers in China in July 1935 and must have originated therefrom. The undersigned's son George was born in August, 1902 and thus could not be an officer of the Imperial Russian Army during the Great War, a fact which certainly ought to have been known to Russian officials. None of the undersigned's assistants were former followers of Semenov. Col. Burt, commanding the 15th Infantry never refused to supply arms to the expedition and on Nov. 30, 1934 he and Mr. G. de Roerich sent a cable to the Secretary of Agriculture (copy attached). American army authorities in China are authorized to issue Governmental arms to Governmental expedition for purposes of hunting and protection and even the Andrews expedition, though organized by a private corporation was equipped with rifles obtained from the Legation Guard in Peiping. Prior to our departure from the USA, Mr. G. de Roerich was asked by the Department of Agriculture to visit the War Department and to choose rifles and pistols for the expedition. At that time we preferred to carry our own firearms, but after Mr. Macmillan had taken away with himself all rifle ammunition, which he was supposed to bring to Harbin, the expedition was forced to ask for governmental firearms. The arms (six rifles and four pistols) were accordingly obtained through the Dept. of Agriculture and the issue of such arms was authorized by Sec. Dern of the War Dept. on Dec. 6th 1934. The arms were delivered to the expedition by the 15th Infantry on Dec. 11th, 1934 and returned by the undersigned and Mr. G. de Roerich to the 15th Infantry through the Legation in Peiping (the 15th Infantry's receipt is dated Sept. 23, 1935 and signed by Major W. R. Buckley, Ordnance Officer). The statement that Czarist circles in Washington succeeded in overruling the Tientsin military authorities is ridiculous and belongs to the domain of fairy-tales, just as the alleged intention of the undersigned to march against the Soviet Union and rally former white elements from among Russians and discontented Mongols! The person who invented these stories should be placed in a lunatic asylum, for it is too ridiculous to think that six men with six rifles and two Chinese botanists could march against the Russian Far Eastern Army or rally nonexistent White Russian elements in Inner Mongolia. The utter stupidity of these allegations is the best proof of the mythical character of the whole story concocted by John Powell and his associates and then circulated in the American Press.

#85. As stated above the undersigned refused to proceed to the Kuku-nor area, and was then directed to proceed to India to complete work there.

#86. We never received any notice of the disbandment of the expedition. Prior to our departure from Peiping we had asked ourselves that the Legation should take over the firearms for transmission to the 15th Infantry at Tientsin. The Legation authorities said that they could not do it without authority from the State Dept. The undersigned then communicated with the Dept. of Agriculture requesting that the Legation should be authorized to take over arms and ammunition.

#89. The Dept's notification of discharge alleged to have been made to the Roerich Museum in December 1935 (exact date not indicated) was never received by the undersigned though he is still in correspondence with the Department and such notice should have been sent to his Indian address and not to the Roerich Museum in N.Y. As stated above neither the undersigned nor his son had any intention to be re-employed by the Dept. of Agriculture. Their connection with the Dept. was only of a temporary nature and they accepted the offer to serve on the expedition only because of Sec. Wallace's invitation.

#90. This truly unprecedented case must have been created by some malicious persons and it is our moral duty to find out the true inspirers of John Powell's articles in which he did not abstain from mixing up officials who by their position should have remained neutral.

#91. The undersigned was never arrested or deported in the years 1926 and 1927 and the whole statement is a complete lie. The defendant will have to show cause for their statements. While the defendants have freely quoted from slanderous statements which appeared in the American and Far Eastern Press they have consistently refrained from mentioning official denials which appeared in the same papers and thus made all previous statements void.

Naggar, Kulu, Punjab, Br. India, Dated Dec. 24, 1936.