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(SPACE BELOW FOR FILING STAMP ONLY)

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9 ATTORNEYS FOR Plaintiff

10 IN THE UNITED STATES DISTRICT COURT

11 OF THE NORTHERN DISTRICT OF CALIFORNIA

12 CHRISTOPHER ROBIN RYAN, SHANNON JO  
13 RYAN, PATRICIA ELLEN RYAN, KEVIN  
14 LEO RYAN and ERIN MEAD RYAN,

15 Plaintiffs,

16 vs.

17 UNITED STATES OF AMERICA

18 Defendant.

CIVIL NO.

COMPLAINT FOR  
DAMAGES FOR WRONGFUL  
DEATH  
DEMAND FOR JURY TRIAL

80 3137 WHO

19 Plaintiff alleges:

20 I

21 JURISDICTION: This action arises under the Federal To  
22 Claims Act, and this Court has jurisdiction under the provisio  
23 of 28 USC §1346(b) and §2401(b).

24 II

25 The plaintiffs have fully complied with the provisions of  
26 Title 28 §2675(a) of the United States Code as evidenced by  
27 Exhibit I attached hereto.

28 III

29 In compliance with the provisions of 28 USC 2401(b), the  
30 Department of State served on plaintiffs, through their attorneys,  
31 an Administrative Determination dated February 1, 1980. The claim  
32 of plaintiffs was denied. A copy of this Administrative Deter-  
mination and denial of claim is attached hereto and marked as  
Exhibit II.

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IV

This Honorable Court has exclusive jurisdiction over the matter in controversy pursuant to the provisions of Title 28 §1346(b) of the United States Code.

V

That Leo J. Ryan is now deceased. The only surviving heirs of Leo J. Ryan, deceased, are:

Christopher Robin Ryan, surviving child;

Shannon Jo Ryan, surviving child;

Patricia Ellen Ryan, surviving child;

Kevin Leo Ryan, surviving child;

Erin Mead Ryan, surviving child.

VI

All of said surviving heirs were dependent on decedent for support and comfort.

VII

At the time of his death Leo J. Ryan was a United States Congressman.

VIII

At least one plaintiff is, and at all times herein mentioned was, a citizen and resident of San Mateo County, California, thus venue is properly laid in this Court.

IX

On or about November 14, 1978, decedent embarked upon an official United States Government fact finding mission to the country of Guyana, South America, for the purpose of investigating reports of grave mistreatment of United States citizens in the colony of Jonestown, Guyana. Jonestown was a settlement of United States citizens that existed as part of the People's Temple Church based in San Francisco, California.

X

Said citizens were constituents from decedent's Congress-

1 sional district in California, or relatives of constituents.

2 XI.

3 On or about November 18, 1978, as said mission was being  
4 concluded, and decedent was in the process of leaving the colony  
5 of Jonestown, decedent was murdered in an attack made upon his  
6 official party by members of the Jonestown Colony ordered by leader  
7 of said Colony, James Warren Jones.

8 XII.

9 Prior to his November fact finding mission to Guyana,  
10 decedent had many times unsuccessfully attempted to learn from the  
11 United States Department of State of the true circumstances and  
12 events occurring at the Jonestown Colony in Guyana.

13 XIII.

14 The United States Department of State knew prior to  
15 November 14, 1978 of vital information concerning said Jonestown  
16 colony and withheld this information from decedent despite his  
17 many requests for such information..

18 XIV.

19 Said information included knowledge by the Department of  
20 State of: a volatile, tense and highly charged atmosphere at  
21 Jonestown immediately prior to decedent's visit; false imprison-  
22 ments of members of the Jonestown Colony; the existence of a huge,  
23 illicit supply of arms and ammunition at the Jonestown Colony;  
24 the existence of acts of extreme violence perpetrated on members  
25 of the Jonestown Colony; the fact that leaders of the Colony of  
26 Jonestown regarded members of the outside world with extreme and  
27 irrational distrust; the existence of a large supply of mind  
28 control narcotics at the Jonestown Colony which were being used in  
29 mind control experiments, initiated by the United States Central  
30 Intelligence Agency upon citizens of the Jonestown Colony.

31 XV.

32 That if the Department of State had provided said vital

1 information to decedent, decedent would not have attempted his  
2 fatal fact finding mission to Jonestown, Guyana.

3 XVI.

4 That decedent had requested, prior to November 1978, in  
5 writing, that the Department of State send a special investigating  
6 team from Washington, D.C. to Jonestown. No such investigating  
7 team was sent.

8 XVII.

9 If said special investigating team had been sent, dece-  
10 dent would not have attempted his fatal fact finding mission to  
11 Guyana.

12 XVIII.

13 At times when decedent made inquiries to the Department  
14 of State of activities of People's Temple in Guyana or provided  
15 the Department of State with information decedent had learned of  
16 activities of the People's Temple in Guyana, decedent, shortly  
17 thereafter would receive letters from members of the People's  
18 Temple urging decedent to desist his effort to probe into People's  
19 Temple's affairs.

20 XIX.

21 On information and belief there was a leak between the  
22 Department of State and leaders and/or members of the People's  
23 Temple.

24 XX.

25 On information and belief that the Jonestown Colony was  
26 infiltrated with agent(s) of the Central Intelligence Agency of  
27 the United States.

28 XXI.

29 On information and belief the name of one said agent was  
30 Phillip Blakely, a trusted aid of People's Temple leader James  
31 Warren Jones.

32 //



1 XXII.

2 On information and belief that said agents were working  
3 with the Department of State and the Central Intelligence Agency  
4 to: use the Jonestown colony as a mass mind control experiment  
5 as part of the Central Intelligence Agency's MK ULTRA program.

6 XXIII.

7 On information and belief that massive quantities of mind  
8 control drugs were found at the Jonestown Colony after the fatal  
9 incident of November 18, 1978.

10 XXIV.

11 On information and belief that in November, 1978, the  
12 Central Intelligence Agency with the knowledge and approval of the  
13 Department of State was working in Guyana to maintain in power  
14 the then current government headed by Prime Minister Forbes  
15 Burnham.

16 XXV.

17 On information and belief that the Central Intelligence  
18 Agency and the Department of State were more concerned with pro-  
19 moting exportation of natural resources from Guyana than exposing  
20 injustices at the Jonestown Colony or protecting decedent and his  
21 official party on their fact finding mission to Guyana.

22 XXVI.

23 On information and belief that in November, 1978, Richard  
24 Dwyer, Deputy Chief of the United States Embassy in Guyana was  
25 also an agent of the Central Intelligence Agency.

26 XXVII

27 On information and belief that Richard Dwyer arranged for  
28 the transportation of decedent and his party once in Guyana;  
29 briefed decedent and his party on the events and conditions at  
30 Jonestown upon their arrival; and escorted decedent and his party  
31 to Jonestown in November, 1978.

32 //

1 XXVIII

2 On information and belief that Richard Dwyer, as an agent  
3 and employee of the Central Intelligence Agency and Department of  
4 State negligently, maliciously and intentionally withheld crucial  
5 information about the Jonestown Colony which would have prevented  
6 harm to decedent.

7 XXIX

8 On information and belief that said agent and employee of  
9 said agency and department knowingly, intentionally and maliciously  
10 led decedent into a trap at the Port Kaituma Air Strip, which cost  
11 decedent his life.

12 XXX

13 That decedent's fact finding mission to Guyana was official  
14 Congressional business, thus the United States Government and its  
15 Department of State were under a special duty to afford decedent  
16 and his party adequate military protection and security.

17 XXXI

18 Despite the fact that the Department of State knew of the  
19 extreme risk involved in decedent's fact finding mission to Guyana  
20 it negligently failed to provide him with adequate security  
21 and adequate military protection.

22 XXXII

23 Despite the fact that the Department of State knew of the  
24 extreme risk involved in decedent's fact finding mission to Guyana  
25 it willfully, intentionally, maliciously and with conscious disregard  
26 of the safety of decedent, failed to provide adequate security and  
27 military protection for decedent.

28 XXXIII

29 The Department of State had a special duty to warn  
30 decedent, a United States Congressman, of the dangers and risks  
31 involved in his official fact finding mission to Jonestown,  
32 Guyana.

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XXXIV

Despite the fact that the Department of State knew of the extreme risk and danger involved in decedent's fact finding mission to Guyana it negligently failed to warn decedent of such extreme risk and danger.

XXXV

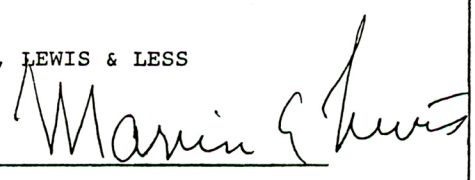
Despite the fact that the Department of State knew of the extreme risk and danger involved in decedent's fact finding mission to Guyana, it intentionally, maliciously and with conscious disregard of the safety of decedent failed to warn decedent of such extreme risk and danger.

WHEREFORE, plaintiffs, as survivors of decedent, prays judgment against defendant, UNITED STATES OF AMERICA as follows:

- 1. For general damages in the sum of \$3,000,000.00.
- 2. For funeral expenses in the amount of \$1,481.20.
- 3. For costs of the suit herein.
- 4. For such other and further relief as the court deems just and proper.

DATED: July 31, 1980

LEWIS, LEWIS & LESS

By: 

MARVIN E. LEWIS  
Attorney for Plaintiffs