

Filed September 4, 1969

This is a True Copy.

Leonard C. Ham

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, ATLANTIC COUNTY
DOCKET NO.

THE MISS AMERICA PAGEANT, a
Corporation of the State of
New Jersey,

Plaintiff,

vs.

WOMEN'S LIBERATION MOVEMENT,
et al,

Defendants.

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:
:
:

Civil Action
AFFIDAVIT

STATE OF NEW JERSEY:

: ss.

COUNTY OF ATLANTIC :

ALBERT A. MARKS, JR. of full age, being duly sworn,
according to law, on his oath, deposes and says:

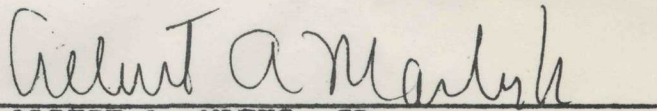
1. I am the Chairman of the Executive Committee of
the Miss America Pageant.

2. Last year, September, 1968, a group of women calling
themselves the Women's Liberation Front or Movement decided to picket
in front of the Convention Hall.

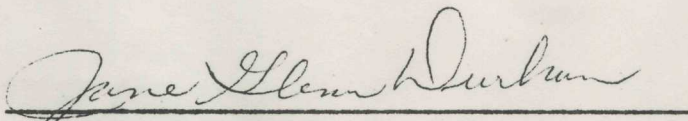
3. On Saturday night of the pageant week, these women
by dropping a bomb or using some other device which emitted a noxious
odor and by displaying certain signs and by being generally noisy
and abusive did interfere with and disrupt the speech of Miss
America during the final minutes of the television telecast.

4. Earlier that day, in front of Convention Hall, these
women did congregate and circle in the front of the Convention Hall
and during the course thereof, did use loud and offensive language
to passersby and to persons entering into and exiting from the
Convention Hall; they did display signs such as "Miss America is a

whore", "Miss America is six months pregnant" and "Miss America is a virgin"; they did spit at passersby and did incite people in the area to violence which people were restrained in large part by the Atlantic City police; they did attempt to create mob violence and did burn girdles, bras, and other articles of women's clothing and underwear; they did generally conduct themselves in such a manner as to disrupt and interfere with the peaceable assembly of persons both in front of and inside of the Convention Hall with the intentions of ridiculing Miss America, the-Miss America Pageant and the girls participating therein and did offend the public health, morals and safety and general welfare of the community.


ALBERT A. MARKS, JR.

SWORN TO AND SUBSCRIBED TO
BEFORE ME THIS ^{4th} DAY OF SEPTEMBER,
1969.


NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Jan. 15, 1970