

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

3	VIETNAM VETERANS OF AMERICA,)	
4	<i>et al.</i> ,)	Civil Action No. C 09-0037 CW
)	
5	Plaintiffs,)	DECLARATION OF
)	BRIGHAM J. BOWEN
6	vs.)	
)	
7	CENTRAL INTELLIGENCE AGENCY,)	
8	<i>et al.</i> ,)	
	Defendants.)	
)	

I, Brigham J. Bowen, declare as follows:

1. I am a Trial Attorney at the United States Department of Justice and have entered an appearance as counsel for Defendants in the above-captioned matter.
2. The matters stated in this declaration are true of my own knowledge and, if necessary, I could and would competently testify to them.
3. Attached hereto as Exhibit A is a true and accurate copy of Plaintiffs' 30(b)(6) deposition notice to Defendants, dated November 16, 2009.
4. Attached hereto as Exhibit B are true and accurate copies of the First, Second, Third and Fourth Sets of Requests for Production of Documents that Plaintiffs have served on Defendants.
5. Attached hereto as Exhibit C is a true and accurate copy of Defendants' Amended Interrogatory Responses, served on Plaintiffs on August 12, 2010.
6. Attached hereto as Exhibit D is a true and accurate copy of a letter from Caroline Wolverton to Plaintiffs' counsel, dated July 30, 2010.
7. Attached hereto as Exhibit E is a true and accurate copy of what I am informed and believe is a CIA memorandum, dated August 2, 1977, produced by Defendants to Plaintiffs in this litigation.
8. Attached hereto as Exhibit F is a true and accurate copy of what I am informed and believe is a CIA memorandum, dated February 12, 1975, produced by Defendants to Plaintiffs in this litigation.

- 1 9. Attached hereto as Exhibit G is a true and accurate copy of excerpts from what I am
2 informed and believe is a 1976 Army Inspector General Report.
- 3 10. Attached hereto as Exhibit H is a true and accurate copy of excerpts from what I am
4 informed and believe is *Project MKULTRA, The CIA's Program of Research in*
5 *Behavioral Modification*, a report from joint Senate committee hearings in 1977.
- 6 11. Attached hereto as Exhibit I is a true and accurate copy of Defendants' written response
7 to Plaintiffs' 30(b)(6) deposition notices, dated March 4, 2010.
- 8 12. Attached hereto as Exhibit J is a true and accurate copy of a redacted version of a CIA
9 1963 Inspector General Report, which has been released to plaintiffs in this litigation.
- 10 13. Attached hereto as Exhibit K is a true and accurate copy of Defendants' written response
11 to Plaintiffs' first request for production of documents, dated March 4, 2010.
- 12 14. Attached hereto as Exhibit L is a true and accurate copy of a letter from Caroline
13 Wolverton to Plaintiffs' counsel, dated July 23, 2010.
- 14 15. Attached hereto as Exhibit M are true and accurate copies of Plaintiffs' supplemental
15 30(b)(6) notices to Defendants.

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17 I declare under penalty of perjury that the foregoing is true and correct. Executed in
18 Washington, D.C. on September 15, 2010.

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20 /s/ Brigham J. Bowen
21 Brigham J. Bowen
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