

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VIETNAM VETERANS OF AMERICA, *et al.*,
Plaintiffs,
v.
CENTRAL INTELLIGENCE AGENCY, *et al.*,
Defendants.

Case No. CV 09-0037-CW

SUPPLEMENTAL DECLARATION
OF PATRICIA CAMERESI,
INFORMATION REVIEW OFFICER,
DIRECTORATE OF SCIENCE &
TECHNOLOGY CENTRAL
INTELLIGENCE AGENCY

I, PATRICIA CAMERESI, hereby declare and say:

1. I am the Associate Information Review Officer for the Directorate of Science & Technology (DS&T) of the Central Intelligence Agency (CIA). I was appointed to this position in 1996. I have 24 years in service with the CIA.

2. The statements made herein are based on my personal knowledge and information provided to me in my official capacity. In the course of my duties, I have been made aware of this litigation and the Plaintiffs' motions to compel. The purpose of this declaration is to explain the basis for the CIA's withholding of specific information privileged under Section 6 of the Central Intelligence Agency Act of 1949 ("CIA Act"), 50 U.S.C. § 403g, from documents produced and to describe the scope of certain searches conducted by the CIA in this litigation.

I. Information Protected by the CIA Act

3. Section 6 of the CIA Act, 50 U.S.C. § 403g, states that the CIA "shall be exempted ... from the provisions of any other law which require the publication or disclosure of the organization, functions, names, official titles, salaries, or numbers of personnel employed by the Agency." As a result, CIA employees' names and personal identifiers (for example, employee signatures, employee numbers or initials), titles, file numbers, and internal organizational data are absolutely protected from disclosure by law.

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4. CIA has redacted a small amount of information protected by 50 U.S.C. § 403g from certain documents produced to Plaintiffs in this matter. CIA also has claimed privilege over a few documents noted on Defendants' privilege log that consist entirely of information protected by § 403g relating to CIA functions for processing FOIA requests. CIA has noted each of its claims of statutory privilege on Defendants' privilege log. I have reviewed the privileged documents and attest that the discrete information redacted and/or withheld from these documents on the basis of §403g consists of CIA organizational and functional data, names and titles of CIA personnel, locations of CIA buildings, and phone numbers of personnel employed by the CIA.

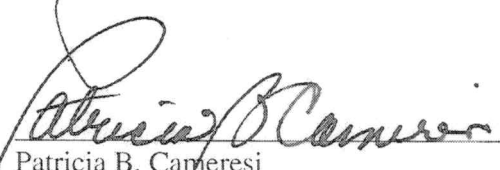
5. Plaintiffs have also served Requests for Production that on their face demand information protected by 50 U.S.C. § 403g. For example, Request for Production Numbers 130, 132, and 143 request the identity of numerous CIA employees that were redacted from documents produced to Plaintiffs. These are names of CIA employees protected by § 403g.

II. Scope of CIA Searches

6. Plaintiffs have identified a CIA Records Retirement Request dated in 1975 describing certain documents relating to Project OFTEN. See Vecchio Decl. ¶ 13, Ex. I. CIA has searched the documents described in this document for information relating to human subject testing responsive to Plaintiffs' first set of Requests for Production. CIA has produced documents from this collection in its Initial Disclosures, but identified no additional documents responsive to Plaintiffs' first set of Requests for Production.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of September 2010.


Patricia B. Camerese
Associate Information Review Officer
Directorate of Science & Technology
Central Intelligence Agency