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June 23, 2010

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Via E-Mail

Caroline Lewis-Wolverton, Esq.  
Kimberly L. Herb, Esq.  
United States Department of Justice  
Civil Division, Federal Programs Branch  
P.O. Box 883  
Washington, D.C. 20044

Re: *Vietnam Veterans of America, et al. v. Central Intelligence Agency, et al.*  
Case No. C 09-00037 CW

Dear Counsel:

I write to request an unredacted and complete copy of the January 1, 1976 "MKULTRA Briefing Book" originally produced on October 22, 2009 as part of the three-CD volume of the CIA MKULTRA FOIA release at DOC\_0000190090. We note that the Briefing Book contains numerous material redactions, and is missing three pages entirely. The cover page of the Briefing Book indicates that it is 399 pages long, but only 396 pages were produced. The missing pages appear to concern MKULTRA Subproject 15. Please provide a complete, unredacted copy of the Briefing Book as soon as possible.

Separately, during the course of our previous meet-and-confer conference calls, we discussed issues relating to CIA front organizations, known as "cut-outs." The CIA cut-outs we have identified are listed below.

CIA Cut-Outs

- Josia Macy Foundation
- Commonwealth Foundation (also known as Commonwealth Fund)
- Geschicker Fund for Medical Research
- Ford Foundation

sf-2860649

Exhibit E to Herb Declaration

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- Ivy Research Labs
- Society for the Investigation of Human Ecology (also known as Human Ecology Fund)
- Granger Fund
- Chmrophyl Associates
- The Scientific Engineering Institute
- Research Foundation of Mental Hygeine
- Amazon Natural Drug Co. (ANDCO)
- H.J. Rand Foundation

Please provide any documents relating to: (1) the legal status of these entities, including, but not limited to the legal relationship between the CIA and these entities; (2) funding provided by the CIA to these entities, (3) contracts between these entities and CIA related to the procurement of drugs, the testing of drugs on humans or animals, or the implantation of electrodes in human or animal brains; and (4) meetings and other communications between these entities and the CIA.

We had also discussed prior cases and Congressional investigations involving the government relating to CIA and/or military experimentation on human test subjects, which may have included deposition testimony or other evidence directly relevant to this case. A list of those matters appears below.

#### Prior Cases

- *Ritchie v. United States*, No. 00-3940 (N.D. Cal. 2004)
- *Kronisch (Executrix of the Estate of Stanley Milton Glickman) v. United States*, No. 97-6116, 150 F.3d 112 (2nd Cir. 1998)
- *Orlikow v. United States*, No. 80-3163 (D.D.C. 1988)
- *Sims v. Central Intelligence Agency*, No. 82-1945; No. 82-1961 (D.C. Cir. 1983)
- *United States v. Stanley*, 549 F. Supp. 327 (S.D. Fla. 1982)

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- *Barrett v. United States*, 76 Civ. 1061 (S.D.N.Y. 1982)
- *Barrett v. Hoffman*, 76 Civ. 381 (S.D.N.Y. 1981)
- *Thornwell v. United States*, No. 78-1845 (D.D.C. 1979)
- *Blauer v. State of New York*, No. 31823 (N.Y. Ct. Cl. 1955)
- Lloyd Gamble – H.R. 998; Senate Report 105-223 (July 31, 1997)
- Frank Olsen – Private Law 94-126 (Oct. 12, 1976)

I hope this information is helpful in your continued search for responsive documents. Thank you.

Best regards,

A handwritten signature in black ink, appearing to read "Daniel J. Vecchio". The signature is fluid and cursive, with the first name "Daniel" being particularly prominent and stylized.

Daniel J. Vecchio

cc: Gordon P. Erspamer