

EXHIBIT 30

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VIETNAM VETERANS OF)
AMERICA, et al.,)
Plaintiffs,)

vs.) Case No.

CENTRAL INTELLIGENCE) CV 09-0037-CW
AGENCY, et al.,)
Defendants.)

INDIVIDUAL AND 30(b)(6) Deposition of
JOE SALVATORE, taken at 2000 Pennsylvania
Avenue Northwest, Washington, DC, commencing
at 8:56 a.m., Wednesday, June 29, 2011,
before Julie Baker, RPR CRR, Notary Public.

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1 that.

2 Q In the middle of the first paragraph, Glen
3 Wallick states -- he's discussing CBRNE claims as
4 well as SHAD claims, and he says these claims
5 resulted in very few grants. Do you have any
6 opinion about that statement?

7 MS. FAREL: Objection to the extent you're
8 asking for speculation.

9 BY MS. O'NEILL:

10 Q Do you agree with the statement?

11 A I can agree we had more denials than
12 grants for the sole reason that most of the
13 individuals submitting the claims were not verified
14 by DOD as being participants.

15 Q Do you have any idea about whether they
16 were not verified because information was still
17 classified or for other reasons?

18 A If their name was not on the list, we ask
19 that the regional office submit records regarding
20 their participation for which they submit the claim
21 to the Department of Defense, in turn the Department
22 of Defense conduct an investigation and provide a
23 confirmatory or negative response confirming their
24 participation.

25 Q I'll bring your attention down to the last

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CERTIFICATE OF NOTARY PUBLIC & REPORTER

I, JULIE BAKER, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn; that the testimony of said witness was taken in shorthand and thereafter reduced to typewriting by me or under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



Notary Public in and for the
District of Columbia

My Commission Expires OCTOBER 14, 2012