

EXHIBIT B

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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 (EDL)

**DECLARATION OF COL BRUCE
SCHONEBOOM, COMMANDER,
UNITED STATES ARMY MEDICAL
RESEARCH INSTITUTE OF
CHEMICAL DEFENSE**

I, COL Bruce A. Schoneboom, do hereby state and declare as follows:

1. I am the Commander of the United States Army Medical Research Institute of Chemical Defense (USAMRICD). In that capacity, I have overall responsibility for and authority over the actions of the USAMRICD, and the civilian and military personnel assigned to the USAMRICD. USAMRICD is the nation's leading science and technology laboratory in the area of medical chemical countermeasures research and development. USAMRICD manages a diversified portfolio of medical chemical warfare agent research projects for the Department of Defense and other federal agencies. I am familiar with the general details of this present litigation and am providing the following statement based on my personal knowledge, as well as information made available to me during the course of this litigation in my official capacity.

2. The Army stated in its March 6, 2014 report (Dkt. 561), that the Army is unaware of any Newly Acquired Information, as that term is defined by the Court's November 19, 2013 Injunction (Dkt. 545). The Army's Report also states, with respect to plans for periodically collecting and transmitting Newly Acquired Information concerning potential long-term health effects that becomes available to the Army, that "[k]ey Army leaders within Army Medical Command will be

1 tasked to inform the Army Surgeon General (TSG) or his/her designee(s) of ‘Newly Acquired
2 Information’ within their commands and area of responsibility.”

3 3. I am familiar with the Court’s April 2, 2014 Order (Dkt. 562), regarding the Army’s
4 Report. The Court stated in that Order that the Army “does not describe any effort to confirm the
5 lack of information in its possession since the entry of the injunction.” In addition, the Court’s
6 Order requires the Army to “identify the job titles of these ‘[k]ey Army leaders’ and explain what
7 it means to have Newly Acquired Information ‘within their commands and area of responsibility’”.

8 4. In this declaration, I describe the Army’s identification of job titles of “key Army leaders”
9 and what it means to have Newly Acquired Information within their commands and area of
10 responsibility, and I describe the Army’s efforts, since the entry date of the injunction, to confirm
11 the lack of such information in its possession.

12 **I. IDENTIFICATION OF JOB TITLES OF “KEY ARMY LEADERS” AND WHAT**
13 **IT MEANS TO HAVE NEWLY ACQUIRED INFORMATION WITHIN THEIR**
14 **COMMANDS AND AREA OF RESPONSIBILITY.**

15 5. The Army has identified the Commander, U.S. Army Medical Research Institute of
16 Infectious Diseases (USAMRIID), and the Commander, USAMRICD, as key Army leaders
17 within Army Medical Command who will be tasked to inform the Army Surgeon General or
18 his/her designee(s) of ‘Newly Acquired Information’ concerning health effects within their
19 commands and area of responsibility. USAMRICD and USAMRIID are subordinate Commands
20 under the United States Army Medical Research and Materiel Command (USAMRMC). Army
21 Medical Command (MEDCOM) is the superior supervising command over USAMRMC.
22 USAMRICD and USAMRIID have been identified as the Army entities where information
23 relevant to this litigation is most likely to be located. As Commander, USAMRICD, information
24 within my Command and area of responsibility would include information maintained within
25 USAMRICD, and by USAMRICD personnel in their official capacity. If USAMRICD, while
26 conducting its usual research missions, prospectively acquires information concerning long-term
27 health effects that may affect the test participants’ well-being, this command will alert Army
28 Medical Command (MEDCOM) or the Army Surgeon General’s Office.

1 **II. DESCRIPTION OF THE ARMY’S EFFORTS TO CONFIRM THE LACK OF**
2 **INFORMATION ITS POSSESSION SINCE THE ENTRY DATE OF THE**
3 **INJUNCTION.**

4 6. The Army identified USAMRIID and USAMRICD as entities within the Army that would
5 be familiar with the research that was the subject of this litigation, and that would be most likely
6 to have Newly Acquired Information, if it existed. I directed that an inquiry be made of key
7 personnel within USAMRICD (*i.e.*, officials and employees who by virtue of their official duties
8 and expertise were most likely to have relevant information concerning the health effects of
9 various chemicals) to determine if they were aware of whether the Army currently possessed any
10 Newly Acquired Information concerning health effects within USAMRICD, as defined by the
11 Court’s Injunction, and these officials indicated that they did not currently possess any such
12 information.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed in
14 Aberdeen Proving Ground, Maryland, on April 16th, 2014.



15 Bruce A. Schoneboom
16 Commander
17 U.S. Army Medical Research Institute of Chemical
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