

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VIETNAM VETERANS OF AMERICA et al.,

No.: CV 09-0037-CW

Plaintiffs,

DECLARATION OF
SAMUEL S. JANG,

v.

CENTRAL INTELLIGENCE AGENCY, et
al.,

Defendants

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the Program Manager, Medical Care Injunction for Participants of Chemical or Biological Substance Testing Programs, Army Public Health Center (APHC), U.S. Army Medical Command (MEDCOM), and the MEDCOM Field Operating Agency with responsibility for supporting the U. S. Army in relation to this litigation. I am familiar with this litigation based upon information received from my staff and legal advisors within MEDCOM.
2. As of December 16, 2019, the Army has received 170 applications, 121 of which were deemed complete and reviewed by a BAP. BAP recommended approval for medical care for 77 of the applications for some or all of the conditions listed on the application, and recommended against approval for medical care in 44 cases.
 1. As of December 16, 2019, the remaining 49 applications are in progress or closed. The Army is requesting additional information for incomplete applications (17); or the application was closed due to the veteran declining further participation or the death of the applicant (32 applications).

1 2. As of December 16, 2019, of the 77 applications recommended for SECDES approval
2 by the BAP, 71 applications have received SECDES approval for all or some of the
3 diagnosed conditions, and six applications are pending SECDES Program approval.
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6 I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true
7 and correct. Executed on December 16, 2019.

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9 *Samuel Jang*

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11 SAMUEL S. JANG, DO, MPH
12 COLONEL, U.S. ARMY
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