

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VIETNAM VETERANS OF AMERICA et al.,

No.: CV 09-0037-CW

Plaintiffs,

**DECLARATION OF
STEVEN M. STARBUCK,**

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 June 3, 2020, the Army has received 178 applications, 135 of which were deemed complete and reviewed by a BAP. BAP recommended approval for medical care for 80 of the applications for some or all of the conditions listed on the application, and recommended against approval for medical care in 55 cases.
3. As of June 3, 2020, the remaining 43 applications are either in progress, of which the Army has requested additional information for incomplete applications (9); or closed the application due to veteran declining further participation or the death of the applicant (34 applications).

1 4. As of June 3, 2020, of the 80 applications recommended for SECDES approval by the
2 BAP, 80 applications have received SECDES approval for all or some of the diagnosed
3 conditions, and 0 applications are pending SECDES Program approval.

4 I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true
5 and correct. Executed on June 3, 2020.
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9 STEVEN M. STARBUCK
10 US ARMY PUBLIC HEALTH CENTER
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