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3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**

5 VIETNAM VETERANS OF AMERICA et al.,

No.: CV 09-0037-CW

6 Plaintiffs,

DECLARATION OF
RAUL A. MIRZA,

7 v.

8 CENTRAL INTELLIGENCE AGENCY, et
9 al.,

10 Defendants

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

- 12 1. I am the Program Manager, Medical Care Injunction for Participants of Chemical or
- 13 Biological Substance Testing Programs, U.S. Army Public Health Center (APHC), U.S.
- 14 Army Medical Command (MEDCOM), with responsibility for supporting the U.S.
- 15 Army concerning this litigation. I am familiar with this litigation based on information
- 16 from my staff and MEDCOM legal advisors.
- 17
- 18 2. As of June 30, 2022, the Army has received 185 applications of which, 136 applications
- 19 were completed and reviewed by the Benefits Application Panel (BAP). The BAP
- 20 recommended approval for medical care of 80 applicants for some or all of the
- 21 conditions listed on their application, and recommended against approval for medical
- 22 care of 56 applicants.
- 23
- 24 3. As of June 30, 2022, the status of the remaining 49 applications includes four for which
- 25 the Army has requested additional information for incomplete applications; 44
- 26 applications that are closed due to the death of the Veteran or from Veterans'
- 27
- 28

1 declination to participate further, and one received by APHC on June 15, 2022, that is
2 pending review by the BAP.

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4 4. As of June 30, 2022, of the 80 applications recommended by the BAP for provisions
5 under the Secretarial Designee Program (SECDES), 80 applications have received
6 SECDES approval for all or some of the diagnosed conditions. At this time, no
7 applications are pending SECDES approval or renewal.

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9 I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and
10 correct. Executed on June 30, 2022.

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13 _____
14 RAUL A. MIRZA
15 U.S. ARMY PUBLIC HEALTH CENTER

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