Q. The question is a specific one, and if you can't answer I will move on. The question was do you recall ever coming to the conclusion in your own mind that the assault youth should be made part of the order of battle?

A. Yes. That was an easy thing to do. My mind was open to that --

Q. You said your mind was open to that. But did you ever say, at any particular point in time, that now I would like to see them included, I think they should be in there?

MR. BARON: Objection. I think the question has been asked and answered about five times.

A. You are asking me to pick a finite date on which I woke up in the morning and said that today's the day we add them in. I don't think I can do that. I did not refute the notion that they were there. We had seen evidence begin to build up that said they had structure around them, and at that point in time, as painful as it was to put youth of any sort in an order of battle and call them a viable military entity, I was still willing to do that.

Q. How young were the youngest assault
Q. Did you ever put a total number of assault youth together with the concept of assault youth and arrive at a view?

A. If I did, I cannot drag a number out at all.

Q. Now, are you familiar with a term called a/k/a units?

A. Also known as. Certainly.

MR. BARON: If you are moving on, would you mind a break? It is an hour and ten minutes into this.

MR. DORSEN: All right.

(Short recess)

Q. Just a question relating to your understanding of what a/k/a units were in 1967. What did that signify in 1967?

A. A unit who had multiple designations.

Q. Was it ever difficult to determine whether units with multiple designations were in fact several units or two units is as opposed to one unit?

A. It was part of the analytic problem.
But by that time in the war we had laundry lists, if you will, of a/k/a's where you could cross-reference numbers, by region, in several different cuts to determine -- you may trace it through two cover names, two cover names, and a nickname. It was still an entity, that if you had your proper indexing before you, you could pare down and avoid double counting.

Q. Were mistakes ever made during that period of time?

A. How the hell do I know? I suspect, going back to my last answer, if a guy, very junior and very inexperienced reporting into MACV, or anyplace else for that matter, the first day was not handed a key to the a/k/a's in his particular region, I suspect he could look at a number, a unit name, unit nickname and say something wrong until somebody corrected him.

That's why it was useful to have the continuity of the advisers in the district and province, because the advisers to the district forces, who were not anchored provincially or to a district, either ARVN or U.S. or Australian or Korean -- Korean were more anchored than some of the others -- it was very useful to have that
anchor for liaison and coordination.

Q. Which people are you referring to as anchors for coordination?

A. The provincial intelligence officer, an S-2 in the advisory detachment.

Q. Weren't they there for a year as well, or were they there for longer?

A. War tends to make you savvy pretty quick. Their counterparts were there forever. And unless you screwed up your relationship with your counterpart, you were in fairly good shape in terms of drilling continuity.

Q. When you say counterpart, you are talking about Vietnamese counterpart?

A. Yes. Remember the tour was only a year long at MACV and CICV, whatever.

Q. What was the tour at the CIA?

A. As I recall, some billets were longer than others, depending on where it was. A CIA field officer, probably not more than a year, 18 months. A lot of those gentlemen were specifically selected because they were bachelors. It didn't have a damn thing to do with their age.

Q. Are you familiar with the term double hatting?
A. I know what the term means.
Q. Did you have an understanding as to what it meant in 1967?
A. Give me an anchor. Double hatting what?
Q. Double hatting of enemy who performed more than one function in the war.
A. I think I have already answered the question, not within the context of double hatting, but when I talked about a pyramidal structure and the ease at which it is easy to separate analytically local and main force, and how it gets a little bit fuzzier down here when you are talking about the irregulars and the subcategories.
Q. What does that have to do with double hatting?
A. Well, you had to sort on that, in terms of where it was happening and in terms of where it wasn't happening.
Q. Did you ever encounter a situation or did you encounter situations in which you believed evidence that there were numbers of enemy who were using different names, more than one name?
A. Oh, yes.
Q. Would you explain that?
A. In my own experience as an S-2 attachment in the Delta, as the officer responsible to sort that order of battle, you quickly had to come to grips with the notion of what a unit's nickname was, what its numerical designation was, and its association with district or province.

Q. I am not making myself clear. What I was talking about were people with more than one name.

A. Oh, yes. Everybody in Vietnam was a little brother or little sister. Smith, Jones and Brown were very common. I am being sarcastic there, but the Vietnamese had counterpart names, which are very, very common.

Q. Did individual Vietnamese, Viet Cong, use more than one name for the different functions they performed?

A. That's what made it difficult to break out political cadre, that's what it made difficult for breaking out secret self-defense. That's what challenged the analytic problem.

Q. How prevalent in your view, in 1967, was the practice of one Viet Cong employing more than one name?
A. The closer to the secret elements, those that were clandestine as opposed to full-time open, the more prevalent it became.

So in the secret self-defense element, operated in GVN-controlled territory, it had the additional challenge of breaking out folks that wore cover names. It was part of the insidiousness of a revolutionary war.

I taught that stuff in special forces school, to our people.

Q. I may come back to this, but I want to go back to something we talked about earlier, namely, the questions I asked about whether you had heard that the MACV estimates for guerrillas, as a separate category, rose from 65 to 80,000 approximately sometime during the August, September time period.

The question I have is did Mr. Adams ever tell you that he had seen a piece of paper at a conference in Saigon, in September 1967, which said, in words or substance, purportedly written by MACV: We will raise our estimate of guerrillas by 15,000 if you drop the self-defense militia?

A. By phrasing your question that way, I recall that. But this is not intelligence. This
process is not intelligence. This is "I will give you a sharpened pencil if you give me a cup of coffee" kind of garbage.

Q. Did Mr. Adams tell you that anyone from MACV said in that connection --

A. I can recall that now. Again it was the righteously indignant Sam Adams coming forward and saying: Would you believe this, and at that point in time several of us would believe anything because we saw what was going down.

Q. Did Sam Adams tell you that someone from MACV had said that -- give any reason or any explanation for that?

A. No, not that I recall. That doesn't come through very clear.

Q. Oor anything more about any discussions Mr. Adams had with anybody from MACV on the subject?

MR. BARON: What is the subject?

MR. DORSEN: The subject of the piece of paper or message relating to increasing guerrillas and dropping self-defense militia, as the witness described it.

A. I suspect there was probably a lot more in the follow-on-discourse. But the example
you give, wherever you got it, seems to ring a
distant bell.

Q. Do you recall that you ever discussed
it with Sam Adams or whether Sam Adams ever
mentioned it to you?

A. That's where I would have gotten it
from. Until you brought it up to me here 18 years
later.

Q. You had not recalled it?

A. No. You recalled it for me. And
when you talked about a trade-off, I don't know
the precise word you used, but it rang true.

Q. Do you remember anything else about
that?

A. We spent a lot of time knee-jerking
and ringing our hands when that team came back.
Different ones of us suffered our conditions of
rage and indignancy, and then were rolled over.

And the publication of the SNIE
seemed to me to ring the curtain down on any
ability to reopen it. Because we rolled into the
system, and the system was wrong, and that's
painful.

Q. When you say the system is wrong,
what are you referring to?
A. The system that we were, as government officials, and myself as a military guy, were brought up in; that when a decision was made, right or wrong, that you clicked your heels and you saluted and you did it.

Our vestage of hope up to that point was that the agency was going to be able to turn that. The agency itself did a little bit of caving in.

Q. Had you ever spoken, and I may have asked you this yesterday, have you ever spoken to General Westmoreland in your life?

A. I briefed him once.

Q. What was that occasion?

A. His former aide, then Lt. Colonel David Peters, was sent to our CE attachment from Saigon, where he had served as an aide, and Colonel Peters became the attachment commander of our Special Forces C detachment. General Westmoreland and his other aide aide, my very good friend Bob McCue, came to the Delta to visit the detachment, to see Colonel Peters to see how they were doing. They received a briefing and I walked them through the border camp situation, and I was the S-2 officer and I briefed him.
Q. Do you remember what you briefed him on?
A. The border situation.
Q. When was this?
A. 1964.
Q. Have you ever seen or spoken to General Westmoreland since?
A. Seen but not spoken to. He was chief of staff of the Army when I worked for General McChristian and I was senior DA.
Q. Did you ever attend any briefing of General Westmoreland or hear General Westmoreland spoken to or speak to somebody else between the incident you just described near the border and the time General Westmoreland left in 1968?
A. Did I?
Q. Were you present?
A. Physically, personally, no.
Q. When you were working for General McChristian, what was your job?
A. I was an executive assistant to General McChristian. He was the assistant chief of staff for intelligence. I was selected by General McChristian, based on a series of files that were sent to him—to look over to see what he
wanted. I was in the Armed Forces staff college at the time.

As special assistant I worked some worldwide, intelligence management programs for him up until the time he retired, and then I went to the Plans and Programs Office of ACSI, and I worked the joint actions for the ACSI staff through the Army staff.

Q. Were you there for virtually the entire period of General McChristian's tenure as ACSI?
A. No. I think he was there probably four months before I graduated from Armed Forces staff college and went to work for him.

Q. Did he ever indicate to you in any fashion that he was unhappy about being ACSI?
A. General McChristian would not do that. General McChristian did those jobs that the Army told him to do. I think he was very content with being its ACSI. He went at it with a vigor and zeal that kept us there many hours. He certainly did not approach his job as a guy that did not care about the job or the responsibility.

He was a solid ACSI.

Q. Do you recall him ever referring to
General Westmoreland?

A. Yes. They had a great deal of commonality in their careers. They both graduated from the same trade school. They had served together many times previously. They had similar years of service. I know the families were close. I was at General McChristian's retirement parade when he thanked General Westmoreland and Mrs. Westmoreland, whom he called by her nickname -- Kissy I think it is. It just implied that there was a great closeness between the two families.

Q. Do you recall if General McChristian ever saying something derogatory in any fashion about General Westmoreland?


Q. What was your role in 1968, April 1968 order of battle conference?

A. I went as an observer and got wrapped around the axle to take a group and try to swing numbers through. I came out of the thing bruised for in good reason. I am not bitter about it but I can remember it.

Q. When you say bruised, what do you mean?

A. I fell afoul of Paul Walsh. I went
in there to represent the staff, as I had, in an
overview capacity in previous conferences. In
this particular one Paul singled me out and said,
"You run with these three guys against this
category," and I can't remember the category other
than it was one of of the irregular groups, "and
you try to negotiate some numbers."

This was after TET -- I think we are
talking about after TET.

Q. Yes, TET was at the end of January.

A. This is when the agency had said all
holes are off, pull the stops. We are not going
to play the-dumb game. We are going to try to go
in there and get what we want, what the evidence
carries.

I can recall coming out of about a
day and a half of negotiation with a few MACV-DIA
guys around a table, and we were able to negotiate
the figures up about 5 to 6000. We briefed it out;
Paul Walsh went bonkers. To my great amazement --
let me caveat that first by saying I thought his
attack was personal and at me. You failed; you
didn't do what you were told to do kind of thing.
You had the evidence but you did not raise the
figures.
I think we were looking in a category for 25,000 more than we went to bed with going into the session. And I was able to get it up four or five, which I thought was a challenge. Again, the process wasn't very delightful. But he wasn't attacking me at all, it turned out. Because in a miff I went to my boss and I had said that I was supposed to be an observer and got assaulted by George Walsh. George Carver sorted it out and said, "He wasn't mad with you. He was just absolutely frustrated with the process, the continued stonewalling with MACV and CIA."

This was after TET.

So I may my amends with Paul Walsh, whom I have great respect for. He in open session got very, very nasty. I wasn't ready for it. I thought I had done the best I could.

Q. Do you have any recollection as to what category you were working on?

A. Not at all. The thing that stuck me in the eye was the reaction to the process. It was one of the bottom tier of the pyramid.

Q. Do you recall which MACV people you were dealing with?
A. Yes. Well, DIA, George Fowler again, the omnipotent George Fowler was there. My recollection is that Danny Graham was there, but my recollection may be incorrect. Danny Graham may very possibly have been at the previous one, the preTET one, and that would have put it in August, I think.

But again we had this very fundamental rigidity at the meeting, take it or leave it kind of stuff. This was doubly fundamentally damning in my view, because here we are at the end of TET and they were approaching the problem as if TET had never happened and the new ability to open the door fresh on what had come off in TET -- TET was sort of like peeling an orange and looking inside in terms of evidence it allowed to roll out. We still had the same fundamental problem with MACV.

Your answer is, in my judgment Danny Graham was there. I don't recall the names of the other MACV people there. As I recall there was one Navy guy among the group.

Q. Do you recall whether aside from the category in which you were involved, whether you had anything to do with any other category?
A. I am quite sure I didn't. It started around a big table, we went off separate ways with smaller groups, each of them pairing up to negotiate. Fundamentally we came out with the same damn fool numbers.

Q. Who was the head of the CIA delegation?

A. Paul Walsh was right up there near the top. OER had gotten more involved by then. OER had begun to form a substantive unit that was dealing with the problem, the Vietnam branch. Previously OER, Office of Economic Research, didn't play with order of battle. OCI did. So we had OCI representatives, OER representatives.

Q. When did OER get involved in order of battle in any significant way?

A. It is my belief that by certainly June, July 1967 they were beginning to scrub numbers and work that portion of the problem.

Q. What branch were you in personally? You were in SAVA during this period?

A. Yes. I was never in any other branch during my detail to CIA than SAVA. I went there and I left there.

Q. Did you ever discuss with Mr. Adams
what instructions, if any, George Carver was given by Mr. Helms in September 1967?

A. Yes. To the extent that I understood what those instructions were, again we felt that by sending a top gun -- George Carver was well known in the community, and as his specific representative -- as the specific representative in Mr. Helms, we were hopeful that we were going to get something that more appropriately would align the numbers.

We felt, and I discussed with Sam, that it just appeared that Carver had strong marching orders to go out there and settle it. And I can only believe, and I didn't see it and there may not even be a piece of paper on it, that the way was laid a little by Helms going into either DOD or right to MACV and asking General Westmoreland to assist in that process, accredit that group.

Q. Do you have any basis for saying that, any specific thing you can point to?

A. Not anything other than when had the heavy rollers got to doing things, they tended to use privacy channel communications, which is quite easy to do. The tardy superstructure of relative
levels of the government allowed -- would have surely allowed Mr. Helms to go with a message to General Westmoreland and say: Hey, I am sending my delegation over. I don't know if that's in the the record anywhere but something greased the skids for that to happen.

Q. Did you see any piece of paper?
A. I didn't see that.

Q. Did you see any communication from Mr. Helms to Mr. Carver during that period?
A. The one way communications coming back to us. I did not see a communication from Mr. Helms to George Carver.

Q. Would Mr. Adams have been privy to communications from Mr. Helms to Mr. Carver?
A. Very possibly, at the other end. Unless they were personal faxes, which gave Carver either latitude or defined his flexibility. He might have not chosen to show those to Sam.

Q. Wouldn't it be at least as consistent with Mr. Carver's position in the CIA that given his position, as you described it, that Mr. Helms gave him full discretion to work out any arrangement that Mr. Carver thought appropriate?

MR. BARON: Could I have that question
(Question read.)

MR. BARON: Object to the form. As consistent with what?

Q. Consistent with any possible instruction to reach an agreement.

A. Well, I don't have a problem with the question, and I think my clue to the answer is my understanding of Carver's messages back to our headquarters, where he deferred to Helms -- there were three messages that I recall, and in each one -- perhaps only two -- he deferred to Helms for either further instructions in terms of: Hey, here is where I am; what do you want me do do?

So I would say he did not have a precise level up or down to which he could go, and he needed to do that message traffic business back to headquarters to see where he went next.

Q. I believe you testified, and correct me if I am wrong, you did not see then what Mr. Helms cabled back?

A. That's right. I did not see Helms to Carver traffic.

Q. Have you ever seen any communications from Mr. Helms to Mr. Carver relating to the
Saigon conference?

MR. BARON: By seeing the communication, do you mean seeing a piece of paper, a physical manifestation of the communication?

MR. DORSEN: Yes.

A. No.

Q. Did anyone tell you that he had seen written messages from Mr. Helms to Mr. Carver in September 1967, relating to the Saigon SNIE session?

A. No, sir.

MR. DORSEN: How much time do I have?

MR. BARON: 13 minutes.

MR. DORSEN: Let me take a brief pause while I gather my thoughts.

(There was a pause in the proceeding)

Q. Can you remember anything else about the April 1968 order of battle conference other than what you have testified to?

MR. BARON: Objection.

A. We went into it and came out with just about what we started with.

Q. When you say "we came into it," you mean the CIA?

A. Yes.
Q. Do you recall anything specific about the conference itself? Any particular discussions, any particular positions?

A. No. In terms of numbers, no. I know that we went in with what we considered to be a new birth of freedom and a clean slate based on TET. We felt there was a lot that had surfaced during TET that said, in fact, that we now could get together on a more meaningful basis and roll this thing into where the war then was, in terms of perfect ability to correct the SNIE. And it didn't work out that way.

Q. Do you remember anything specific in terms of positions, discussions?

A. Specific to --

MR. BARON: Objection.

A. -- order of bad battle?

Q. Yes. Relating to the April 1968 conference.

A. Fundamentally, we felt that the event of TET had surfaced those forces that we had consistently felt were there, probably in even greater names based on the evidence that we had when we went through the previous summer of 1967.

And said: Okay, let's get them back out on the
table, let's readdress the thing and get the order of battle going and let's see where the numbers rise to.

Q. Do you remember what, if anything, MACV representatives said at the conference?

A. MACV hadn't at that point in time accepted the infiltration. Again, it just seemed to reinforce the notion that there was a ceiling that we very firmly believed was not allowed to be broken.

Q. What did anyone from MACV say, if you recall?

A. I can remember Mr. Helms' speech --

Q. I am just asking --

A. Specific conversations, I am sorry, no. It was 18 years ago.

Q. When was the last time you talked to Barry Williams about the 1967, 1968 order of battle conferences and SNIE?

A. The very last time?

Q. Yes.

A. I talked to him in the last few days.

Q. How many times have you talked to him in the last two years?

A. We were assigned in Europe together.
He was a commander and I was a G-2, both in Europe. J. Barry just came back in, I guess, the mid summer timeframe, June, July time frame. For two years prior to that I saw J. Barry physically or talked to him on the phone probably eight or nine times. He had soldiers that worked in my area, and he supported me with certain types of intelligence. We spent very little of that time talking about the case, the trial, the incidents surrounding this.

Q. Do you recall seeing cables or hearing, after the September 1967 Saigon conference, that MACV was displeased in some fashion with Sam Adams or unhappy with Sam Adams or didn't want to see Sam Adams again? Do you recall that?

A. After the September --

MR. BARON: Objection.

Q. 1967.

A. No, sir.

Q. Did you see anything during that post September Saigon conference to indicate that MACV was in any way denying CIA access to MACV intelligence?

A. MACV in the person of General
Westmoreland or MACV as an entity and command?

Q. MACV as an entity.

A. No.

Q. Did you see any indication or evidence prior to the September 1967 SNIE conference that MACV, as an institution, was denying the CIA access to intelligence relating to the Vietnam war?

A. They didn't have to do that. They didn't do that. They were the final blesser on finished intelligence product. They didn't have to deny anybody the raw to still be able to keep a cap on the official pronouncement which CINCPAC and U.S. army-Pacific and DIA rubberstamped. The roll was still coming. The single, triple and double interrogation reports, the documents, the unfinished intelligence messages and cables out of the field, I don't think that was ever turned off. But there was an awful volume of nitty-gritty. That was a real production effort out there of many, many people, CICV, the joint intelligence area. Just lots of folks.

Q. Do you know whether the CIA had a representative physically located in the Current Intelligence Indications and Estimates Division
1 during 1967?

2 A. I do not have knowledge. I would

3 suspect that at will, somebody out of the

4 substantive shop there, in the agency station,

5 probably was in and out of there almost often

6 enough to have a desk in there, but I don't know

7 who it was. It could have been the DDI rep or one

8 of his assistants.

9 Q. Do you have anything that you base

10 that on?

11 A. There is a pretty damn decent working

12 relationship at the analytic level. That's what

13 one of the problems here is. Analysts had common

14 cause and common agreement. There was some pretty

15 decent free flow.

16 Q. Did anyone ever complain to you that

17 there wasn't a good relationship in the analyst

18 level?

19 A. No, sir, I have no knowledge of that.

20 On my visits over there earlier, I could get into

21 any damn shop I wanted to.

22 Q. Did you have any problem when you

23 were getting access to information after at the

24 time at MACV J-2 offices?

25 A. My business back over in Vietnam
after TET was strictly with the embassy. It was not with MACV. My project was to build, put together and establish some graphic abilities in the situation room for the station.

Q. Did you have an understanding in 1967, early 1968 as to where the CIA sent its cables from physically, what building or facility?

MR. BARON: In Washington, Saigon, or somewhere else?

MR. DORSEN: In Saigon.

A. We are talking about the new embassy

Q. Prior to TET, excuse me.

A. The new embassy had just got banged up a little bit during TET. I have to say it that way because I am very, very familiar with the old embassy, the one they moved from. I had enough continuity to go back that far.

I can't believe they didn't have their own message center right within the embassy proper and an SSO that served the country term. That's what an embassy is, a country team headquarters.

I think I am losing the point of your question.
Q. The question was simply if, say, Mr. Carver wanted to send a cable to Mr. Helms or Lou Sandine wanted to send a cable to Mr. Carver, would it have been sent from the embassy or would it have been sent from someplace else in Saigon, if you know?

MR. BARON: Objection to form.

A. I just flat don't know. I know we had special security officer facilities that served the military. Therefore, in the new MACV complex it was very obvious to me they had staff personal back channel capability. In that new embassy, they wouldn't have built that embassy without that capability.

Just on pure common sense and experience I would say they had a capability to send traffic out of the embassy.

Q. Do you know or did you know in 1967 who Robert Komer was?

A. Yes.

Q. And in the summer of 1967, in the fall of 1967, who was Robert Komer, as you understood him?

A. MACOORS.

Q. Did you understand his chain of
command?

A. He was the deputy MACV for revolutionary development actions and passification.

Q. Do you know whether he reported to anyone other than General Westmoreland -- did you know in 1967 that he reported to anyone other than General Westmoreland?

MR. BARON: Objection to form.

A. We know where he came from and we suspected that those ties were very, very tight.

Q. Where did he come from?

A. He came from the White House.

Q. And when you say "we suspected," who is the "we"?

A. Well, let me say that George Carver, George Allen and I were well aware that Mr. Komer was the President's man for very proper and good reasons in MACOORS. He was sent over there to do a job and run the revolutionary development cadre program.

Q. Do you recall whether Sam Adams knew who Mr. Komer was?

A. I can't believe he didn't.

Q. Do you ever recall discussing Robert
Komer with Sam Adams during that time period?

A. Sure. Komer took a hard line on good news back to home. And as part of the MACOORS group, as the deputy to General Westmoreland, that was a simple and clear indication to us that the command, at the very, very high level, was rolling statistics back that favored success in the war.

Q. Do you recall whether you and Mr. Adams ever discussed whether Robert Komer was communicating directly with the White House?

A. No. I remember I, on one of my TDYs, I was asked to pass for Mr. Carver a message to Mr. Komer, ostensibly from the President, relative -- and I can't remember the precise subject. It had to do with some agency program that the President had endorsed, that he wanted to assure that Mr. Komer addressed up front.

And I made an appointment with this August super grade and wandered in. I had two guys traveling with me. One of them went with me, in there with me, and I made my little speech as best I could and Mr. Komer started to raise hell, and as I recall his direct quote it was, "Fuck the President. I ain't going to do that. If the President wants me to do that he is going to have
to tell me to do that himself."

Sitting on his desk was a framed photograph of President Johnson that said, "Dear Komer, with love."

Q. Do you recall whether you told that story to anybody?

A. I probably did. I still remember it vividly. I know I told it to Mr. Carver when I got back because I so said, "Don't do that to me again."

Q. Do you recall if you told the story to Mr. Adams?

A. I very possibly did. Sam and I and George Allen talked a lot. We spent a lot of time together. It was everything from my own experiences in Vietnam to evidence that we were mutually finding, to results of Sam's TDYs, to what what Sam was doing, to what George Allen was thinking, to his vast experience on the Vietnam problem. Everything from pungy stakes to infiltration.

MR. BARON: I think you are out of time.

(Deposition adjourned at 6:05 p.m.)
ACKNOWLEDGMENT

STATE OF NEW YORK:
COUNTY OF NEW YORK:

I, DONALD M. BLASCAK, certify that I have read the transcription of my testimony, and that the foregoing is a true and accurate transcription of same.

DONALD M. BLASCAK

Signed and subscribed to before me this day of 1985.

NOTARY PUBLIC
CERTIFICATION

I, RAYMOND DE SIMONE, a Certified Shorthand Reporter and a Notary Public, do hereby certify that the foregoing witness, DONALD M. BLASCAK, was duly sworn by me on the date indicated, and that the foregoing is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.

[Signature]

RAYMOND DE SIMONE, CSR