Q: Did you have one for every village in South Vietnam?

A: There were 2,500 villages and we probably had documents, that I kept -- there were some of them that were old. Back in 1965 I only kept totals, I mean large totals. I didn't worry about hamlets and villages in 1965.

Q: I'm sorry. I'm confused about your use of 1965. You mean for documents from 1965?

A: Yes. Saying what the strength was. We had a lot of hamlet documents in 1965 that listed the names of all of the guerrillas. I didn't use them. I didn't have time to. 1965 was too far away and I felt that the documents in early 1965 were reliable. So as long as we had a reliable starting point then we could see what happened to the guerrillas. There wasn't enough big documents that I ever saw in 1965 from which to build a picture up or down. So excluding that -- now, what's the question? With the 2,500 villages, we had something over a hundred different documents.

Q: Did you have a captured enemy documents for every hamlet in South Vietnam?

A: Less than a hundred.

Q: For less than a hundred hamlet level documents?

A: Yes. That gave the troop strengths in hamlets.

Q: Taking those different geographical, hamlet, village, district and province, do you recall which level of organization you had the most documents for?
MR. DUKER: Objection.

THE WITNESS: Do you mean absolute numbers? Like if we had 73 hamlet and 104 village?

Q (BY MS. MCGINN) Let me break it down. I'm talking about province level documents not, for instance, documents from a province that might talk about the district. I'm talking about the source from the district, whether you had more documents from districts than from the provinces.

A Oh, level documents?

Q Right.

A With numbers in them?

Q Right.

A District.

Q Which level, geographical level, that being, again, village, hamlet, province or district, which documents did you find to be the most reliable?

MR. DUKER: Objection.

THE WITNESS: Yes. That's a problem because some district level documents were totally unreliable and some district level documents were very reliable. Some hamlet level documents were nothing but, "Hey, I'm doing a great job down here, look what I've done", and you knew they were reliable and some of them would just be a roster, name, address and weapon, and you figured those were pretty darn reliable because they're verifiable by the VC. You get up to
the province level or the all country level and they say there are 150,000 guerrillas or 180,000 guerrillas. I would bet my reputation as a guerrilla analyst that there weren't exactly 180,000 guerrillas, but I would also stake my reputation that a lot of village documents, when they said there were 13, that there were 13, but that the magnitude at the country level was 130,000. So I really can't say which level was the most reliable.

Q (BY MS. McGINN) You can't make any kind of a generalization?

A No. It depended on where it came from. If it came out of a military committee at the district level, a current affairs committee at the district level, it was pretty reliable.

Q Was the reliability of your information for a province a function of how many documents you had for that province?

MR. DUKER: I'm sorry. I didn't hear it. I didn't hear.

THE WITNESS: The answer is yes or no, does that help?

MR. DUKER: I'm sorry.

MS. McGINN: Read back the question.

(Question read.)

MR. DUKER: Okay. I'm sorry.
THE WITNESS: Yes. In the fact that if there were lots of documents which you could use to verify other documents and show consistency, then the answer is yes. But there were lots of times that in these operations we would receive documents from a number of people who heard the same speech and just because 10 people reported it didn't mean that it was true. So you still had to look at the source and then you had to look internally at the information contained in the document.

Q (BY MS. McGINN) So reliability was a function of consistency, to some extent?

MR. DURER: Objection.

THE WITNESS: To some extent, but also, as I'm saying, 10 people may have reported a speech where a guy says hypothetically we've got 500,000 guerrillas in South Vietnam. Just because 10 people reported that same speech didn't make it true. But if I had documents from different committees, from different areas which indicated that this village had so many guerrillas and that village had so many guerrillas and this district had so many guerrilla and then I get a document that covers an outline of that same area and gives the same numbers of numbers even close to it and then I have another document six months later that is in line with the trend, you figure that they're pretty reliable. I'll give you an example, Gia Lai, 1967. Gia Lai, 1967, May and
November, two documents, six months apart from each other captured, and I think it was May, '67, not '68, but in the one there was 11,355 guerrilla. In the other there was 11,235 guerrilla. That's pretty consistent. Those documents were six months apart. Yes, if I had those two documents I would say you can be pretty sure that there were that many guerrilla in Pleiku, which was VC Gia Lai. Pleiku was the government of South Vietnam province. You know, theoretically, what were there carried on the OB, 700 for that province during that time period?

Q (BY MS. McGINN) Are you finished?

A Yes. That's one example.

Q Well, what did you do about provinces, districts, villages or hamlets where you didn't have captured enemy documents?

MR. DUKER: Objection.

THE WITNESS: I get to unload on my study. No. We discussed this before when we talked about the compute: analysis that we tried to put together. I'll just briefly go over that.

Q (BY MS. McGINN) I can ask you another question and you may not have to.

A Okay.

Q Did you use regression analysis to fill in these gaps?
We used two methods to determine strengths. One is we took the big documents and -- I'm talking about countrywide, provincewide and looked at trends and followed what the trends were. An example was what -- well, I think I put it in my guerrilla paper in the October conference and certainly George Allen had it in his as one method of determining. That is, we believed that the document of 130,000 guerrillas in 1965 was reliable. We also had plenty of documents and that same document, the Ahn Son document which said we want to have this percentage of guerrillas out of this type of area. So then we would look at the pacification program, if you will, and say what's happened to the manpower base and we would say it has decreased by 30 percent. Thirty percent of 180 is such and such, subtract it from 180 and you come out with the figure of what, 150 something? Well, that's not right, but that was one way you would do it. And that was for time frames when you didn't have them.

For areas when you didn't have one, you might have a province document and you might have a number of district documents and then you would have some village documents spread over here. So then by using the documents -- the districts and the villages which you did have you would try and build upwards as to what should be in other areas or if you didn't have the province document and you only had the
district documents you add those together based on the information which you had. Maybe it was just a document from another district, you would build your estimate as to what the district -- I mean, excuse me, what the province should be based on, just a few district documents.

The other way was this computer study where we used about 30 factors, and I'm not standing on that. As I mentioned before, the only reason why I mention that is it turned out to be right. I don't know why. All I'm saying -- and we didn't do much with it. We fed in the information which we had in the computer, we fed in about 30 factors which we thought affected the strength of the guerrillas and we started verifying and the numbers came out right. Maybe some day with more work on it it could have been worked out to a scientific thing. At that point in time it was just a real rough estimate as to what strengths were. That was based on the information we had from provinces, districts and then considered in light of the core area, the geography, rice production, hamlet evaluation, that type of thing. So that's the way we did it.

Q I'm a little confused when you say the numbers came out right. What do you mean by that?

A Okay. After I had put all this together and we had our 30 factors and each factor was given weight, then I went through the country by district and gave weight to each
district, what was the rice production, was it highland, was it a delta, that type of thing. Then I had a run. Based on the information which we had we knew that in this area which was 80 percent VC controlled, 20 percent were pacified hamlets and all of these other things, we knew that we had so many guerrillas. So equating these factors to this number I then said, "Computer, tell me what it is for the whole country because I know the factors but not the numbers." All it is is working out the formula, and bingo, it printed it out. Then we would get documents and coincidentally or scientifically they were real close to what the computer said they ought to be. I don't want to place anyone's representation based on that. It was only in the very preliminary stages when I was working with it, but that's what I meant, the numbers came out right. The computers said it should be such and such a strength and by darn we would find a document that was close.

Q Did you ever find documents that were not close?
A Yes. No question.

Q So you had two methods that sound very similar to me except one is by computer and one is you sitting down there and working it out yourself, is that correct?
A No. There are differences. When we sat down and worked it out ourselves, we based it pretty much on the hard evidence that we had. The computer took factors that we had given values to and worked out the numbers. I mean, what's
the value of a huge rice harvest in the delta as compared to rough terrain or at least not hospitable terrain up in the highlands? One, we were trying to say what were the factors that affect the strength of the guerrilla forces, the ones that we could quantify, and in the other one we're saying we have hard evidence, now how can I take a known factor from this area and move it to another area.

Q By hard evidence, are you referring to translations of captured enemy documents?
A Yes.

Q Well, would you refer to this technique that you were using as extrapolation? Is that a better term than regression analysis?
A Yes.

Q Did you think, Mr. Parry, that your extrapolation estimates were more reliable than your estimates based on translations of captured enemy documents?
A More reliable?

Q Yes.
A Yes.

Q Less reliable?
A Certainly. Because I was taking a known, which I thought was very reliable, and from that I was making an estimate.

Q So from that, would you say that some of your
estimates were more reliable than others?
A If you want to quantify it from 1 to 100, yes.
There were some that were 70, and others that were 72's.
Q Did you ever talk to any officers who were
commanding in the field in South Vietnam?
A Did I ever talk to them?
Q Talk to any in the fall of 1967, spring of 1968?
A Certainly not in a professional capacity.
Q But you did talk to officers who commanded in the
field in South Vietnam?
A I don't really recall doing it.
Q Do you know if they relied on the MACV order of
battle for information about guerrillas?
A Whether they did?
Q Yes.
A I think I answered this one before and I said I sure
hope not.
Q I don't recall that answer.
A And personally I don't think so because the
information coming out of the provinces didn't correlate, or
whatever word you want to use, with the MACV.
Q What do you mean by that?
A The MACV order of battle, as far as I could
determine from everything available to me, which included
captured documents and reports from the field, was totally
unrelated to all of them.

Q When you say reports from the field, are you referring to sector advice or reports which were known in the fall of 1967 as Ritz Reports?

A The Ritz Reports, the Hess reports. Just a minute. There was a report which came out of the field which the MACV gave the numbers to on the OB. I mean, they just copied the MACV OB. I'm not sure if that's the right report or not.

There was something coming out of the field that copied MACV's OB. There were a number of other reports by the pacification chief, the intelligence officers, things like that. I mean, which, generally, and I'm not talking about they generally did this, I'm just saying that in general terms they were consistent with the CIA numbers and not consistent with the MACV numbers.

Q I'm sorry, I missed that last sentence.

(Answer read.)

THE WITNESS: Maybe a quick summary of what I said was, based on what I saw, MACV's order of battle was not consistent with MACV's input.

Q (BY MS. McGINN) Do you know whether you were seeing all of MACV's input?

A No. Obviously -- I mean, I'm sure I wasn't seeing all of MACV's input, but based on the information which I had from not only field units but also analyzes, MACV order of
Battle was consistent with its own numbers that it was generating internally.

Q: Explain to me, I'm confused. Did you or did you not receive Ritz Reports?
A: Yes.

Q: You did receive Ritz Reports. Do you know how the MACV estimate for guerrillas was prepared mechanically?
A: One, I don't understand the question, but I think that even if you explained it to me the answer would be no.

Q: Do you know how a MACV analyst would sit down and take all those reports and come out with the number that was in the OB?
A: All I know is what I was told and, that is, that the MACV analyst, specifically Hawkins, had numbers which agreed with CIA which MACV refused to acknowledge. So the mechanics of coming up with a number was not to rely on their analyst.

Q: Who told you that?
A: Who told me that?
Q: Yes.
A: I had heard that first in a conversation with Mr. Adams after his return from Saigon, and that had been discussed on other occasions. But I remember the one time and I think I testified to it earlier, when I met Sam in the hall after he had come back from the Saigon OB conference and asked him what had happened. That was explained.
Q Did anybody else ever tell you that?
A My recollection is yes, that someone else discussed it.

Q Do you remember who?
A My best recollection now is that it was George Allen. But it is possible that it came through Walsh or Smith. I know I discussed it with other people.

Q Did you ever discuss it with any MACV analyst?
A No. You had very little discussion with the MACV analysts.

Q Do you know if MACV evaluated captured enemy documents?
A Did they evaluate them?
Q In preparing guerrilla estimates?
A Well, again, in answer to your question, I am sure that MACV analysts analyzed captured -- or translation reports of captured enemy documents. Whether that analysis was used in preparing the OB, personally, I have my doubts.

Q But you simply do not know?
A Yes. You know, you asked the question about the mechanics of things and I told you I didn't think I could answer it. No, I don't know exactly how they did it, but I do know from what was in those documents and what Hawkins and the other analysts were seeing could not have been analyzed if -- analyzed in support of the MACV OB. They just totally were
irrelevant to each other. Do you want some more examples?

Q You do not know upon what the MACV OB was based, is that correct? The OB number for guerrillas you do not know?

A What it was based on?

Q That's right.

A I know what factors went into the MACV OB after the Saigon conference.

Q For guerrilla strengths we're talking about right now.

A Irregular guerrilla strengths, yes.

Q What factors went into the MACV guerrilla strength after the Saigon 1967 conference?

A Based on what I knew, based on my own research which excluded the analysis of captured enemy documents as being much of a factor in the MACV OB, I believe that the MACV OB, at least following the Saigon conference was based more on political pressures than on actual evidence.

Q How did you derive that conclusion based on your research, Mr. Parry?

A Based on reading the communications going back and forth between the CTA and MACV, based on my discussions with Sam Adams, George Allen at SAVA, and my discussions with my superiors, principally Walsh, and Walsh particularly asking me, "How sure are you on your numbers? Here's the problem we
have, MACV is saying we can't go above this number." Walsh
explaining to me that MACV would not go above those numbers
because they didn't think that it should be -- politically,
that they could withstand it.
Q Mr. Walsh told you that MACV could not politically
go above a certain number?
A Mr. Walsh told me that he believed that MACV was wed
to certain strength numbers because of the political
repercussions which would arise if, one, the guerrilla
strength figures were raised to the level that the CIA knew
they ought to be and, two, if the militia were included within
the order of battle.
Q Did Mr. Walsh ever tell you he thought the CIA
needed to work harder on their analysis in order to persuade
other people, members of the intelligence community, and I
mean in the fall of 1967?
A My recollection is that Smith said that to me. He
came back after the capitulation and said, "Okay, you just
work that much harder and next time we'll beat them."
Q Do you know why the next time he thought you would
beat them?
A Because I believe that Ron Smith believed we were
right. That was based on everything he told me.
Q Did you believe that you were right prior to the
Saigon conference of September, 1967?
Prior to the Saigon conference in 1967 I was not really involved much in the dispute.

Q When was it after the Saigon conference of 1967 that you became persuaded the CIA's numbers with respect to guerrillas were right?

MR. DUKER: Objection. I think you've mischaracterized what he's just said.

Q (BY MS. McGINN) Well, if that's the case, he can correct me, thank you.

A I always figured the CIA numbers were right. I did not know that there was going to be such a dispute over them. I had seen the MACV order of battle. It had been shown to me in passing. It was not something that we relied on. It was not even something that we read in the South Vietnamese branch prior to the Saigon conference. My belief and understanding was, maybe it was my naive belief and understanding, was that people were going to get together in Saigon and come out with the truth. The MACV had carried the same number for all those months and I believed that they didn't think those numbers were true. When they came back and said that MACV wouldn't agree to them, I obviously couldn't believe it and so I was interested in what was going on and, therefore, I read the cables going back and forth, I read everything I could get out of SAVA on that, and I read everything that came into our branch. I think, as I testified before on that subject, SAVA
had more than we did. I asked Walsh and Smith and I asked Adams and I asked Allen why because I couldn't believe it.

Q Mr. Parry, how do you define the term "order of battle"?
A How do I define order of battle?
Q How do you define the term.
A Let me tell you what I understand an order of battle to be. An order of battle, as I understand it, based on the order of battles that I saw in the CIA during the time that I was employed there, is a strength analysis of a military force. Basically, a manpower analysis, numbers.

Q How do you define the term "insurgency base"?
A Insurgency base is the population base from which an insurgency can gain men and material.

Q Can you explain to me the difference between the concept of insurgency base, the concept of order of battle, as you understand it?
A Yes. The order of battle for MACV would list the troops that supported the war effort in Vietnam. The insurgency base for MACV would be the United States and all its Allies. Do you understand?
Q No, I don't think I do.
A Well, what I'm saying, at least the way I use the term insurgency base, and it wasn't one I used in the CIA, the way I understand the term now is it's the basis, the economic,
political, the manpower base from which an insurgency can obtain resources. An OB is the manpower that has been extracted from the insurgency base. That's my definition.

Q Do you know if the CIA, in the fall of 1967, was preparing something called an order of battle for the forces, Communist forces in South Vietnam?

A In the fall of '67?

Q Yes.

A Under my definition of an order of battle, the CIA was preparing a very limited order of battle.

Q And what do you mean by a limited order of battle?

A It was limited to troop strengths in regular and irregular units as that was defined at that time. I do not believe that an OB, if you would, for Sappers was determined or estimated at that time. There was no OB, as I recall, at that time for assault youth, although there were some figures that were discussed. What I'm saying, it was limited in its scope in that it didn't cover every component of the VC military structure.

Q Do you know how MACV used the term order of battle?

A All I know is that the document that we received monthly which was entitled — I can't remember the exact title, but which was the MACV order of battle. So you could go through that and you could get unit strengths, VC unit strengths, NVA unit strengths by province, by district, by
military region, by unit.

Q Do you remember the use of the term "insurgency base" at the April, 1968 OB conference?

A I don't recall it now.

Q Do you recall that term ever being used during the time that you were at the CIA?

A All I can tell you is that when you said it, it sounded familiar.

MS. McGINN: Off the record.

(Short recess.)

Q (BY MS. McGINN) Mr. Parry, did you read the SNI 14.3-67 in the fall of 1967?

A In the fall of 1967?

Q When it was published?

A Published early November, 1967, right? I read -- well, I read it.

Q Do you recall when?

A No. That was the reason why I hesitated on the last answer. I'm not sure if I saw even a draft of this until at least the latter part of October, and I recall seeing it soon after it was signed and published.

Q Do you recall if you saw the draft or the final version in late October?

A I think I saw the final version after the 13th of November. Now, possibly I saw some paragraphs of it prior to
the 13th of November. I know I didn't see the whole document prior to the 13th of November.

Q Did you agree with the way the Communist organization was depicted in the SNIE 14.3-67?
A No.

Q Why is that?
A Because I think it underestimated the strengths, the numerical strength and was misleading as to the military capabilities of the militia, secret self-defense.

MR. DUXBRY: Read the answer back, please.

(Answer read.)

Q (BY MS. McGINN) You disagreed because you thought they underestimated the strength of the secret self-defense militia?
A The guerrillas you asked me?
Q That's why I'm asking you, I was confused about those two responses.

A As to the estimate of guerrilla strengths, I believe that the SNIE 14.3 underestimated the numerical size of the guerrilla units in South Vietnam, first. Second, I believe that the SNIE 14.3 was misleading as to the military capabilities and functions of the so-called militia, i.e., self-defense and secret self-defense forces.

Q Mr. Parry, I'm going to present you with what I would like to have marked as Plaintiff's Exhibit 126. It is

(Whereupon, Exhibit No. P-126 was marked for identification.)

Q (BY MS. McGINN) I would ask you to turn to page 15, paragraphs 32 through 37, which refer to other Communist organizations and ask you to please tell me which of those sentences are misleading with respect to the self-defense militia.

A Which paragraphs did you say again?

Q I said 32 through 37, which I believe, as I read this document, refers to other Communist organizations which subsumes self-defense militia.

MR. DUKER: I'm going to object. Can we go off the record for a second?

(Whereupon, an off-the-record discussion was had.)

THE WITNESS: In paragraph 32, although the statements or each sentence thereof may not be inaccurate or in itself misleading, reading that paragraph I come to the conclusion that the self-defense forces are not much better than every other able-bodied person under VC control. This isn't a serious misleading, but in reading that paragraph you come to -- you get the impression that now here's the fighting
man and everybody else is out here and that includes everybody, any able-bodied person. I believe that the self-defense forces were a well-organized, trained, effective, fighting force.

In paragraph 33, second sentence, self-defense forces include people of all ages. That is either inaccurate or misleading because although you may find an old man in a unit here or pre-teen in a unit there, that was the exception, not the rule. And it states that a substantial percentage of them are females. That whole sentence, in the tenor of what has been read, is really downgrading the capabilities. A lot of that is just because of the way people perceive females in a military combat mission, but they were as tough as the men were. I did a little bit of research into that. We even had pictures of captured female guerrillas and I'll tell you, they're as rough as anyone else. Although it's written, they're trying to get people to think these are just old people and women and children. That wasn't true. And the impression I get from reading that, that isn't true either. They are largely unarmed and only partially trained. That's true as far as it goes, but it doesn't explain that there are arms available and that they are trained in the use of arms. I don't understand what partially trained means. Because they are trained to shoot, they are trained to booby trap, they are trained to do all the functions which they had to do.
The next sentence that starts with "The duties of self-defense includes maintenance of law and order", they had other responsibilities which are more of an offensive nature than a defensive nature and we discussed that really quite a bit during the deposition. It would also depend on where they were located. Obviously it was purely law and order and defense way back deep in the VC controlled areas. When you got closer to GVN areas or within the contested areas, they had much more than offensive aggressive responsibility. Self-defense forces do not leave their home areas and members generally perform their duties part-time. If you added in the words generally did not leave their home areas and the members generally performed their duties part-time, that sentence would be correct.

And the next sentence is correct because their existence did pose an impediment to Allied sweep and pacification and in their defensive role they inflicted casualties on Allied forces, but they also posed more of a threat and impediment to Allied operations and they at times had an offensive role. They just don't get involved in sweeps and pacification and inflicting pain or death.

Also, I haven't been going through this talking about the secret self-defense, but the secret self-defense in the contested or GVN areas were much better equipped. They had an aggressive role, mining, booby trapping bridges,
roads, blowing up command posts, things like that. That is nowhere discussed in here. Oh, excuse me, we go to the next paragraph which is the secret self-defense.

Paragraph 34, the secret self-defense provides more than a residual "presence" in the contested and the VC areas, and I'm not sure of the word primarily by clandestine. That was a major function of the secret self-defense. But they also engaged in terrorist activities, too. And the first sentence of paragraph number 5 is certainly true. Really, I'm reading through that.

I don't recall that much about the assault youth to really be able to make a comment on it.

I'm going to paragraph 36. I believe that the estimate of the self-defense and the secret self-defense, probably assault youth, but they're relying entirely on an expert in the area, I believe that it could be estimated with a fair measure of accuracy. The way it's used here, that they can't do it with any measure of confidence suggests that the number they're going to give you is just a wild guess. I believe that some documents more than suggested that the size of the self-defense forces were 150 in 1966. I believe that information was fairly accurate. I believe it was less accurate, though, than the guerrilla figures during that same time period. I believe that the next sentence is a little bit misleading in that it says "Suffered substantial attrition
since that time." I'm not sure that the attrition was
substantial if you're talking in net numbers. They may have
lost a lot of people to casualty and upgrading, but I'm not
sure that the bottom line had attrited that much. In fact,
I'm not even sure that the SNIE suggests that it's below the
150,000 level. I'll have to read on.

I do believe that there was a decline in the quality
of the self-defense militia if you're talking about age and
physical condition between 1965 or early '66 and late 1967,
although I do not believe that it could be characterized as an
appreciable decline in quality, and I also think that's very
misleading because it suggests that they weren't much back in
1966 and they're even less than that now. They were tough
back in 1966 and they were a little less than tough in -- you
know, a little less tough in 1967, but they were still a force
to be reckoned with.

Q (BY MS. McGINN) Let me interrupt and ask you a
question. The number that you had for self-defense militia
in the fall of 1967 was 90 to 120,000, is that correct?
A Correct. I do not believe that the statement is
accurate that the size of the militia force had declined and
the quality of the militia force had declined due to the
shrinkage of VC controlled or populated areas. I think the
document is misleading to state that they are not offensive
military forces. True, one of their primary functions is to
consolidate defense, local, that type of thing. They did have, one, an offensive military capability and, two, they used it. Also, the statement that it's an impediment to our sweep operations is misleading because it was more than an impediment. Impediment seems to be something that slows you down. These people could stop you. I believe it was incorrect not to include them in the military order of battle. They were being body counted, they were inflicting casualties, they were doing everything that everybody else in the order of battle was doing except being counted in the order of battle. The military estimated these type of people inflicting their type of pain along with hamlet guerrillas inflicting one-third of the casualties.

The last sentence of paragraph 36 suggests that, yes, they did inflict casualties, but it's not really -- they're not really serious. And then the overall strength figures in paragraph 37, I believe, are just wrong. I was wrong. I thought they had a number in here for the militia, but they don't. I don't think it's misleading to include all of these different complex organizations in an order of battle because we certainly do it. When we're doing our order of battle or our strength in Vietnam, the U.S. strengths included cooks, it included soldiers that shined boots for officers, it included all of that. I think we sure should have included in their order of battle people who were inflicting casualties. I
disagree that a meaningful estimate could not have been made at that time.

Q. Are you finished?
A. Yes.

Q. Do you know who wrote those paragraphs, Mr. Parry?
A. No, I do not.

Q. You did say that you don't recall whether you saw a draft of the--

A. I don't recall. I know I discussed this and estimates and characterizations of the militia and self-defense, secret self-defense guerrillas with Walsh at that time and I know I discussed it, whether this actually is the document, and commented on the document prior to its publication, I just can't recall. My recollection is I did not see it. That's my best recollection, I did not see the actual paragraphs.

Q. Do you know which component of the intelligence organizations were taking part when the SNIE first suggested that the self-defense forces should not be included in a military order of battle?

A. No. All I can say is that we, the analysts, at the CIA, believed that they should be included and the report from the Saigon conference was MACV didn't want them. Who was the first one to say we don't want them, I don't know.

Q. Are you aware of the SNIE meetings that were taking
place in the summer of 1967?

A  No, I was not.

Q  Did you know at the time that you were at the CIA that Sam Adams had filed a complaint with the CIA inspector general in the spring of 1968?

A  Yes, I was.

Q  What did you know about it?

A  Just what Sam told me about it.

Q  You never read it?

A  No, I did not read it.

Q  What did Sam tell you about it?

A  Well, that's a broad question and I'll try and respond as much as I can recall. I know that during this time period, and that's prior to like the 2nd or 3rd of April of 1968, Mr. Adams and I had discussed a number of problems that we saw in the intelligence efforts of the CIA along with the intelligence efforts of MACV. We did not just -- okay. Sam had told me some things concerning the CIA, and I can't recall precisely now what they were, but the things that he thought that ought to be handled, ought to be changed, ought to be looked at. I do recall one was training for Vietnamese analysts, training for CIA personnel that was going to Vietnam. One was language training, we ought to send people over there that could understand what was going on and not ones that had to rely on the French or someone else to tell us
what the VC thought. I can remember those types of things.

I can remember he came to me, and I cannot recall, I think it was after the fact, and told me that he had delivered a document to the director's office setting forth all of his concerns. I can't tell you exactly what was said, but I do know that his intention at that time, and I assume always, but I just don't know what happened after I left, was that this was to be an internal thing, that it was delivered to the director's office, that it wasn't — I mean, he didn't publicize it without the agency, he really didn't publicize it within the agency.

At one point in time, I can't recall whether he did then or it was a year later, he asked me whether I would -- well, during this time period he asked whether I agreed with the things that we were discussing and he was interested in my opinion. I generally did agree. There were lots of things that he talked about that I had no knowledge of so I couldn't agree or disagree. He was much more involved in the agency than I was. He had been there a lot longer, he had a lot more experience than I did and I thought, based on all of this, and based on my discussions with him, I thought that he understood the situation better than I did in the agency, in the OB, in all of these areas.

At one point in time he asked if I would consider contributing to this — I don't know if it was a complaint or
whatever it was -- and I told him I would. I know that he
called me when I was -- oh, it was a lot longer than a year
later, when I was practicing law in Chicago, which would have
been in 1972, and talked to me briefly on the phone about it
saying that, "This thing is still going on, I want to come and
talk to you about it, maybe if you would do an Affidavit or
something like that." I don't think he called it an Affidavit,
but "Make a statement." I said, "Yes, sure." He said, "I'll be
out in the Chicago area at such and such a time, can I come
see you? Yes."

I hadn't really talked to Sam from the time I left
the agency until then. We exchanged maybe a couple of
Christmas cards and a couple of letters, but Sam and I were --
well, let me explain it this way. I think we respected each
other, but it wasn't one of these buddy-buddy type things that
you go socialize together and visit each other after you've
left the agency. It wasn't that.

But in any event, he came out to Chicago. My best
recollection, he was there for about a day. Also my best
recollection is he arrived on a day when it was just bitter
cold and he also, I think I've testified to this before,
brought me a wrench, which has subsequently been lost. He
asked me -- he would say, "Okay, now what about this and how
do you feel about it?" I would tell him what I thought about
it. And he'd say, "What about this and what do you think
about it?" I can't recall the specifics anymore, but I know there were some areas where I just said, "Hey, I have no idea if that's what was going on." He would say okay and go onto another. As far as I know, there was no problem there. There were some areas with the analysis, there were some areas with accepting things that we knew weren't true, those types of things I knew about. The SNIE had upset me.

Q What was the time frame he visited, 1972?
A 1972. I remember he came to Chicago.

Q What did Mr. Adams tell you was the status of his complaint at that juncture?
A The only thing I remember on the phone, this is typical Adams, and I'm quoting, "I've got to call you because you know this thing is boiling up again and I may have to do something with it. I was just wondering if you would be interested in participating," that type of thing. That was the way it was brought to my attention.

Q Was he any more specific about what he had boiling up again?
A No. It was just kind of general. He said, "Would you help." I said, "Yes." He said, "I'll come out." I said, "Okay," and he came. I know that we got specific when he got there and that he took notes of the things I said. My best recollection is that he called me soon after, and by soon after he left, within a month, and went back over the notes
that he had taken of what I said, and my recollection is he said, "If I need it, is it okay if I" — I think we decided that while he was there. I said, "Okay, if you want me to do something, you've got my notes, write them up and send them to me." As I recall in the conversation, he said, you know, "Okay. If I need this, then I write them up and send them back to you and see if they're okay and see if that's what you said", and I said, "Yes, sure." I agreed to support him. That is, I think, the last time I talked to Sam until late December or early January of 1981-82.

Q Were these notes ever sent back to you in any form?
A No.

Q You never heard anything further about that from Sam?
A That's correct.

Q Did you ever hear anything further about that from anybody else at the CIA?
A No. I may have had a conversation at one point in time with Dave Shields because I was doing a lot of work in Washington, legal work for the regulatory agencies. I know that on some of those occasions that I called up Shields and talked to him. I know that I would have said, "Hey, what's going on with Adams?"

Q Do you recall anything more specific about your conversations?
A No. I recall asking about "What's happening with
his complaint to the director", and my recollection is that
Dave Shields just basically said, "It's still going on, nothing has been resolved." But I do know, going back to when I was there, that some changes were made as a result of his complaints and one of them is they started a training program for CIA Vietnamese analysts because I was one of the first to go through that training program.

Q When was this, Mr. Parry?
A It must have been in the summer of '67, but it's possible it was in the summer of '68 when I came back.
Excuse me, excuse me. Probably it was in the summer of '68 before I left to go to law school, but it's possible it was in the summer of '69 when I came back. I remember they handed out a little envelope folded over that had brochures stuck in it, a map of Vietnam on the front. Most of the things in there were touristy. I mean, the documents that were given weren't deep analysis documents, but it did talk about the country generally. Then for, and I can't recall the length of it, whether it was half a day or two days, possibly it was three days, we had lectures and my best recollection is that Sam was one of those who lectured.

Q Mr. Parry, how do you know that that training program was the result of Mr. Adams' complaints?
A One is that I knew that that was one of his complaints and, two, is my recollection is he told me that
they had agreed to do this. And, three, I know that he was
instrumental in running it. That was not the job of SAVA.

Q Did anyone else ever talk to you about Mr. Adams'
complaints at the CIA?

A No. In the office we obviously talked about it, the
fact that something had been filed. But, as I said, he didn't
publicize it. Dave Shields, I think, knew, obviously Ron
Smith knew, and the three of us -- you know, and I can't be
sure about Dave Shields, but I know that Smith knew. Sam
didn't talk about it much, but the rest of us kind of wondered
what was going on and what was going to happen.

Q Were you ever interviewed by anybody from the
inspector general's office about this?

A You know, I can't remember that. Somehow I have a
recollection that I was, but -- it may have just been Walsh.

Q Walsh interviewing you?

A Yes.

Q Or Walsh questioning you?

A Trying to find out what was going on. It's just
terrribly vague. Somehow I think I discussed this with
somebody with authority, not just socially.

Q Was this in the summer of '68 before you left to go
to law school?

A Yes. It would have been right after it happened.

That's why I said it could have been Walsh because it may have
been he wanted to know what I knew.

Q. Did Mr. Adams ever complain to you that his analysis
was being ignored by higher level officials at the CIA?

A. I'm not sure if that's the way he characterized it,
but yes.

Q. How would you characterize it?

A. That I think his comments were, "They've sold out
and they know that these numbers are right, but they're
willing to accept the MACV numbers just for peace." Whether
that is -- no, I don't think they were ignored. I don't think
anybody in that agency doubted that those numbers weren't
right. I mean, I think everyone knew that Sam was right on
the numbers. As I mentioned before, I did because they agreed
with my numbers. I don't think anybody ignored them. I think
people just kind of gave into pressures, whatever those
pressures were and agreed to numbers which they did not
believe.

Q. Did he ever complain to you about George Carver?

A. He told me that Carver had capitulated, but I don't
think that -- I don't think that I could characterize it as
complaining. It was a statement of fact.

Q. Is that all?

A. Yes. We didn't really talk about Carver.

Q. Did he ever complain to you about Paul Walsh?

A. No, I don't think so.
Q Did he ever complain to you about Ron Smith?
A I don't understand what you mean by complain.
Q Why don't you answer it the same way you've been answering my questions about complaints.
A We discussed Ron in lieu of the fact that he was a career employee and that he may have to make concessions expedient to his rise in the agency. I agreed.
Q Can you tell me what kinds of concessions either you or Mr. Adams were referring to?
A Not standing up for the numbers that he knew were right.
Q And in what situation are you referring to there?
A I'm referring to the fall of 1967 and the debate over the SNIE.
Q Did Mr. Adams ever complain to you about Richard Helms?
A I really don't recall. I know we discussed the failings of the agency, inadequacy of the agencies, not failings, and whether that was directed at Helms or at the agency itself, I don't know. This was in the training area again. That's more what I was involved with Sam on, this and the numbers.
Q What contacts have you had with Mr. Adams since your last deposition?
A With Mr. whom?
Q Mr. Adams since your last deposition?
A He dropped in here yesterday and he introduced me to
counsel and they stayed a short time. I was in the middle
of a crisis. My settlement was falling apart. If I have to
go to trial I'm in deep trouble. It is possible that I talked
to Sam on the telephone after the last depositions, but I
don't think so. I just don't have a recollection of it.
Q What did you talk about yesterday?
A I talked a lot about my trip to China and I think
the longest thing we discussed was a story about a
parachutist, somebody who jumps out of an airplane. We didn't
really discuss this at all. I mean, I was introduced. Randy
was here and Randy had to go back to a meeting. So the idea
was -- I mean, I don't know if that was the idea. They said,
"We'll come in the day before and introduce people and then
go." I didn't see anyone after that. I had someone waiting
for me upstairs when they were here.
Q So Mr. Adams came to your office yesterday with Mr.
Duker and Mr. Mastro?
A Yes.
Q They all came in together?
A Yes. You know, I'm not saying we didn't discuss the
case a little. It was all in generalities.
Q What in general did you discuss?
A I don't think there was anything specific about it.
We didn't discuss "What do you think about this?" There was none of that. I know I made some comments about my prior testimony. Yes, there was questions about whether I had read George Allen's deposition.

Q Have you read George Allen's deposition?
A No.
Q Do you have George Allen's deposition?
A I was once given a copy of George Allen's deposition.
Q When was that?
A Randy sent one to me sometime.
Q Between the time of your last deposition and this one?
A Yes. I talked to Randy on a number of occasions because of, put it on the record but it probably should be off the record, because of the fact when you people were here before and required daily copy I had to have my secretary stay and a number of other people stay to do the work. My deal with the secretary was you don't get paid overtime until they pay the firm for the expenses, which were the copying expenses and an hourly rate for the secretaries. As far as I was concerned, we had not received that check. She kept saying, "Can't I get paid", and we kept calling Randy and he kept saying, "If I had my way, they would all be paid." That check was paid, anyway, for weeks, but they ever acted on it. I didn't find that out until like two weeks ago.
So I had talked to Randy on a number of occasions about that check. After the check arrived -- my secretary had told me a way to figure out how to get paid before the check came and she wasn't really as excited about getting the check.

In any event, during that time period I asked him whether Allen's deposition had been taken and I think it was taken a week after mine last time, I'm not sure, but sometime in there and then it was adjourned and continued, that's my recollection. But in any event in one conversation I said, "I think that would be an interesting one to read." He said, "Well, I'll see if it I can send you a copy of it." At one point in time a copy of that did arrive along with copies of my deposition and he said, you know, "Go through it and make corrections." He pointed out that guerrilla was misspelled everytime. Those volumes sat on the floor of my office and last night I read through my deposition from about eleven o'clock at night until four o'clock. I have two briefs due tomorrow and that's the first time I looked at my deposition other than momentarily before the deposition that I testified to. I didn't read Allen's deposition. I just don't have time.

Q You haven't read any of Mr. Allen's deposition testimony?

A I didn't read any. I can recall picking it up and I
can recall going through it once or twice and thumping the
to see if I saw a name that I recognized. I recall
Adams once or twice, but it was nothing. It wasn't
interesting and so I put it down. I just didn't have time to
read it.

Q Other than conversations with Mr. Mastro about the
check, as you've previously testified, what other contacts
have you had with defense counsel since your last deposition?
A Setting up these depositions. That's all.

Originally, obviously, they were scheduled for sometime or I
was asked whether I would be available during Christmas and
New Year's. I wasn't terribly excited about that, but I
figured I had a hearing on Friday and figured I would have
to be in town. Thank goodness it was you people that
couldn't come and it was put off.

Q Have you received any other documents from defense
counsel, Mr. Mastro?
A I may have been shown some others yesterday. I
mean, not to look through. It's possible. Yes, I think there
was a digest of Allen's deposition that I saw yesterday,
physically saw at a distance. Was it a digest? No. Just a
minute. I didn't read it.

Q Do you still have a copy of it?
A No. I've given everything back to them, to CBS's
counsel.