

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION
4

5 VIETNAM VETERANS OF AMERICA, *et al.*,
6 Plaintiffs,
7 v.
8 CENTRAL INTELLIGENCE AGENCY, *et al.*,
9 Defendants.

Case No. CV 09-0037-CW

DECLARATION OF LIEUTENANT
COLONEL RAYMOND LAUREL,
U.S. ARMY MEDICAL RESEARCH
AND MATERIEL COMMAND

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11 I, Lieutenant Colonel Raymond Laurel, am familiar with the complaint in this case. I
12 make the following statement based on my personal knowledge and information made available
13 to me in my official capacity. I declare the following under penalty of perjury:

14 1. I am the Secretary of the General Staff for the Medical Research and Materiel
15 Command (MRMC), the higher headquarters for both the U.S. Army Medical Research Institute
16 of Infectious Diseases (USAMRIID) and the U.S. Army Medical Research Institute of Chemical
17 Defenses (USAMRICD). These two commands are the successor organizations to the units that
18 conducted biological and chemical tests using servicemember volunteers between 1953 and 1975
19 at Fort Detrick and Edgewood Arsenal. USAMRIID's mission is to discover and develop
20 medical solutions to biological threats. USAMRICD's mission is to discover and develop
21 medical countermeasures to chemical warfare agents.

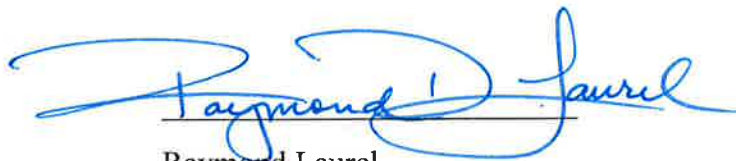
22 2. I am familiar with Department of the Army Inspector General's report concerning
23 the use of human volunteers in chemical test programs, published in 1976 (DA IG Report). This
24 report, drafted shortly after the conclusion of the human volunteer test program, is the best
25 record of the program I am aware of. Because the report details the various authorities
26 underlying the chemical test program at Edgewood Arsenal, it serves as the best index of
27 documents related to the program. While copies of the report itself are available, this command
28 does not have a complete record of the report that includes all referenced source documents.

1 3. I am aware that both USAMRIID and USAMRICD have searched and are
2 continuing to search their records for documents referenced in the DA IG Report as well as other
3 documentation of Army chemical and biological testing using human volunteers. The objective
4 of these searches is to develop a complete file that includes all documents referenced in the
5 report and to identify documents responsive to the requests for production in this case.

6 4. I am aware that plaintiffs have requested documents related to congressional
7 testimony about the chemical and biological test programs. USAMRICD has identified a set of
8 documents titled "Human Volunteer Historical Information – US Senate Inquiries." Other than
9 that source, neither USAMRICD nor USAMRIID maintains a record of specific documents used
10 to support congressional testimony concerning the test programs.

11 I am aware that plaintiffs have asked for documents describing hospitalizations,
12 emergency room trips, or other medical attention required by volunteers participating in testing.
13 The only potential source of this information I am aware of is the individual volunteer's test
14 record. This command does not maintain a consolidated list of volunteers who visited the
15 hospital or emergency room during testing, or diseases or long-term medical conditions related
16 to participation in test programs. This command has no record of any test volunteer deaths
17 during testing.

18 I hereby declare under penalty of perjury that the foregoing is true and correct. Executed
19 this 15th day of September, 2010.

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23 Raymond Laurel

24 Lieutenant Colonel, U.S. Army

25 U.S. Army Medical Research and Materiel

26 Command