

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VIETNAM VETERANS OF AMERICA et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY, et  
al.,

Defendants

No.: CV 09-0037-CW

**DECLARATION OF**  
**RAUL A. MIRZA,**

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, Defense Centers for Public Health, formerly the U.S. Army Public Health Center (APHC), U.S. Army Medical Command (MEDCOM), with responsibility for supporting the U.S. Army concerning this litigation. I am familiar with this litigation based on information from my staff and MEDCOM legal advisors.
2. As of December 30, 2022, the Army has received 185 applications of which, 137 applications were completed and reviewed by the Benefits Application Panel (BAP). The BAP recommended approval for medical care of 80 applicants for some or all of the conditions listed on their application and recommended against approval for medical care of 57 applicants.
3. As of December 30, 2022, the status of the remaining 48 applications includes four for which the Army has requested additional information for incomplete applications and

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44 applications that are closed due to the death of the Veteran or from Veterans’ declination to participate further.

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

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

MIRZA.RAUL.ALEX Digitally signed by  
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RAUL A. MIRZA  
DEFENSE CENTERS FOR PUBLIC HEALTH -  
ABERDEEN