

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GENERAL WILLIAM C. WESTMORELAND,  
Plaintiff,  
-against-  
CBS INC., et al.,  
Defendants.  
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82 Civ. 7913 (PNL)

AFFIDAVIT OF  
JOSEPH A. McCHRISTIAN

STATE OF FLORIDA )  
                  ) ss.:  
COUNTY OF MARTIN )

JOSEPH A. McCHRISTIAN, being duly sworn, deposes  
and says:

1. I am a retired Major General from the United  
States Army and reside at 365 South Beach Road, Hobe Sound,  
Florida. From July 13, 1965, to June 1, 1967, I was the  
Assistant Chief of Staff for Intelligence for the U.S. Military  
Assistance Command, Vietnam under General Westmoreland.

Background

2. After my graduation from West Point in 1939,  
I commanded every size unit, from a platoon to an armored  
corps of over 50,000 men. My first key intelligence posi-  
tion was as the Chief of Intelligence for General Patton's  
Third Army at the end of World War II. For the next year, I

was Deputy Director of Intelligence at the headquarters for U.S. Forces, Austria.

3. From 1948 to 1963, I had various assignments, including ones as a batallion Commander of the Third Infantry National Honor Guard regiment in Washington, D.C., U.S. Army attache to the U.S. embassy in Athens, Greece, Commanding Officer, 2nd Armored Regiment and the Armored Training Center, Fort Knox, Kentucky and Chief of the Western Division in the Office of the Assistant Chief of Staff for Intalligence, Department of Army (a position I held during the 1962 "Cuban Missile Crisis").

4. In January 1963, I was nominated for promotion to Brigadier General and named Chief of Intelligence for the U.S. Army, Pacific (USARPAC), in Hawaii. On July 13, 1965, I became Assistant Chief of Staff for Intelligence (J-2) for the U.S. Military Assistance Command, Vietnam (MACV), under General Westmoreland. In this position, I exercised staff supervision over intelligence for all U.S. Armed Forces in Vietnam, including the Army, the Navy, the Air Force and the Marines.

5. On June 1, 1967, I left Vietnam to become Commander of the Second Armored Division in Fort Hood, Texas. I later commanded the U.S. Army III Corps. In August 1968, I returned to Washington to become the Assistance Chief of Staff for Intelligence for the U.S. Army, a position I held until my retirement in 1971.

Developing an Intelligence Organization in Vietnam

6. Upon becoming the MACV J-2 on July 13, 1965, I learned that then-Secretary of Defense Robert McNamara was due to arrive in Saigon on July 16, and that I was to brief him on the enemy and on the intelligence resources needed to fight a war. I told Col. William Crosson of my staff that I wanted the briefing to be in the form of an Intelligence Estimate. Col. Crosson informed me, however, that MACV, at that time an advisory mission, lacked the organization, the resources and the manpower to support such an Estimate; he said that most of MACV intelligence came from the South Vietnamese J-2. During my briefing of Secretary McNamara, he interrupted and asked me to discuss only the intelligence resources that we needed. I did so.

7. I spent the next two years creating the MACV combat intelligence organization in Vietnam. Since two of the most important sources of combat intelligence are prisoners and captured documents, I established an extensive interrogation system with a large center--the Combined Military Interrogation Center (CMIC)--in Saigon, and a combined Document Exploitation Center (CDEC).

8. As soon as one of the enemy was captured on the battlefield, a report called a "Knowledgeability Brief", containing general information, was sent to the CMIC and to

Washington. By the time the prisoner reached the interrogation center, interrogators were ready with detailed questions on the subjects on which that particular prisoner was knowledgeable. The interrogators got their questions from groups called Requirements Teams, each of which was particularly knowledgeable about one of the factors important for studying the enemy Order of Battle. These factors included composition, disposition, identification, strength, training, morale, leadership, logistics and combat effectiveness.

9. The Combined Document Exploitation Center had close to 250 highly trained specialists translating, reading and analyzing captured enemy documents. I had my staff write a book on Viet Cong Terminology, and we trained Vietnamese intelligence personnel for two to three months in translation. By early 1967, we were capturing half a million pages of enemy military documents a month, approximately 10 percent of which contained very useful information. If a unit captured a document in the morning and flew it to the CDEC, a report on that document was issued at the latest by the following morning.

10. The captured documents were also indexed and filmed. The indexes, the documents themselves, the translations and the basic information from the documents were then input into an FMA storage and retrieval unit. The Order

of Battle analysts at the Combined Intelligence Center, Vietnam (CICV), had access to all of this information. They also worked closely with the Requirements Teams.

11. CICV issued an Order of Battle Summary every month. In February 1966, I brought in Col. Gains Hawkins (who had worked with me at USARPAC) to head the J-2 MACV Order of Battle Branch. Col. Hawkins was a highly knowledgeable and professional intelligence officer. He was a good organizer and extremely conscientious and hard-working. I had great admiration for him and trusted him completely. Nevertheless, I made Col. Hawkins convince me of the validity of every estimate we made. In order for an enemy unit to be accepted, its existence had to be supported by two prisoners, two captured documents or one of each. Our estimates were conservative.

#### Improved Collection Capability Against the Political Order of Battle and Guerrilla Forces

12. The two components of the Order of Battle on which information was most lacking when I took over as MACV J-2 were the Political Order of Battle and the Guerrilla forces. As adequate resources became available to MACV in late 1966, I initiated a comprehensive reevaluation of the estimates of these two categories. The Political Order of Battle collection program was called "CORRAL", and the Guerrilla Order of Battle collection program was called "RITZ".

13. Until the spring of 1967, the strength estimates for the Political Order of Battle and Guerrilla forces which we included in the monthly Order of Battle Summaries were the estimates that had been given to MACV by the South Vietnamese before I became J-2. Until late 1966, we did not have adequate resources to devote sufficient effort to these forces.

14. The CORRAL and RITZ studies of the strength of the Political Order of Battle and Guerrilla forces were completed in May 1967. Col. Hawkins prepared a cable which included estimates for both components which were far higher than those then carried in the CICV Order of Battle Summary. Col. Hawkins had been working on these studies for a long time, and I went over them carefully myself until I was convinced of their validity.

15. Although I usually sent my intelligence reports directly to Washington, in this instance, because (due to the completion of CORRAL and RITZ) we were for the first time able to update the strength figures we had received from the South Vietnamese J-2, I took the cable in to General Westmoreland before sending it. After reading the cable, Gen. Westmoreland said to me that if he sent it to Washington it would be a "political bombshell". I offered to take the cable personally to Washington and explain its



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SOUTHERN DISTRICT OF NEW YORK

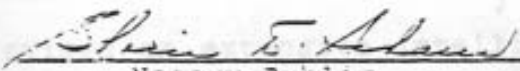
contents in greater detail. Gen. Westmoreland did not accept my offer; he said that he wanted to review the cable and told me to leave it with him. I do not know what happened to the cable.

16. From the beginning of my tour as MACV J-2, I insisted that the Viet Cong political infrastructure and the irregular forces had capabilities which could adversely affect the accomplishment of MACV's mission; as well as the mission of the Ambassador, and must be included in the Order of Battle.

17. In February 1983, I was shown the document attached hereto as Exhibit A. That document includes a cover memorandum together with an enclosure entitled "J-2 MACV Comments on CAS Memorandum A-2364 - 9 March 1967" that I sent to Mr. Louis W. Sandine of the American Embassy in Saigon in late March 1967. Both the cover memorandum and the enclosure contained the best information available to MACV at that time and were believed by me to be accurate.

  
Joseph A. McChristian

Sworn to and subscribed  
before me this 3 day of  
March 1983.

  
Notary Public

NOTARY PUBLIC IN THE STATE OF NEW YORK  
MY COMMISSION EXPIRES ON 12/31/83  
STATE OF NEW YORK

EXHIBIT A is JX 230.

B-437



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GENERAL WILLIAM C. WESTMORELAND, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CBS INC., et al., )  
 )  
 Defendants. )

82 Civ. 7913 (PNL)

AFFIDAVIT OF  
JOSEPH A. MCCHRISTIAN

State of Florida )  
County of Miami ), ss.:

I, JOSEPH A. MCCHRISTIAN, being duly sworn, depose and say:

1. I am a retired Major General, U.S. Army. I served about 14 of my 38 years in the Army in intelligence assignments.

2. I was the J-2, MACV (the head of MACV intelligence) from July 13, 1965 to June 1, 1967. The day I became J-2 (July 13, 1965), I was informed that the mission of MACV had been changed from an advisory role to a combat role. We were at war, albeit undeclared. My immediate challenge was to prepare a 10 minute briefing on the capabilities and vulnerabilities of the enemy and a list of all intelligence resources required to support our new mission. I was to present both to Secretary of Defense, Mr. Robert McNamara, who would arrive in Saigon 3 days hence. I took over a woefully inadequate intelligence organization. While J-2, I conceived, justified, built and supervised an extensive intelligence organization which made

use of the intelligence capabilities of our Vietnamese and free world allies.

3. Shortly after I became J-2, <sup>I JRN</sup> ~~he~~ submitted a recommendation to General Westmoreland that he invoke the Fourth Force Concept to have the CIA in Vietnam placed under his command. I believed that COMUSMACV should exercise Unity of Command over all resources. I do not know what actions, if any, were taken on my recommendation. The CIA in Vietnam was never assigned to MACV as a Fourth Force (Army, Navy, Air Force, CIA).

4. While I was J-2, I made a conscientious effort to keep all higher headquarters (DOD, CIA, DIA, CINCPAC) accurately, timely and adequately informed of all intelligence in which each was interested. All of these headquarters were, from the day I became J-2, placed on distribution of all J-2 MACV intelligence reports to include translations of captured documents, interrogation reports (PW's, hoi chans), <sup>Gen. [unclear]</sup> ~~reports~~ reports, intelligence studies, J-2 estimates, Order of Battle summaries, and so forth. Much of the intelligence data base at each sector was maintained on card files which were created and used by all intelligence agencies. These files were under control of the CIA.

5. The CBS broadcast states on page 6 of the transcript: "Shortly after Westmoreland suppressed his intelligence chief's report, General Joseph McChristian was transferred out of Vietnam." <sup>Mr.</sup> Mr. Dan Burt, counsel to General Westmoreland, tells me that in his opinion the CBS broadcast implies that I was

transferred out of Vietnam for reporting higher numbers. This interpretation of the broadcast may or may not be true. I do not know. The "higher numbers" could be a reference to my reporting of enemy strength figures during the previous year or longer. <sup>the</sup> The facts concerning my transfer as I know them are as follows. As the end of my two year tour of duty in Vietnam neared in 1967, General Westmoreland asked me to volunteer to remain as J-2 for a third year. I felt highly honored and told him so. However, I told him if I did so, my entire future in the Army would be as an intelligence specialist. I had never sought an intelligence assignment. My training was in infantry and armor. I volunteered to extend my tour of duty for a third year if I could command a division in combat. General Westmoreland said that I had earned and deserved to command a division in combat and that he would so recommend to Washington. A few days later he called me to his office and handed me a cable from Washington. It stated that the policy to extend a general officer for a third year was not favorably considered. This meant that I could not remain in Vietnam in any assignment. I received orders assigning me as Commanding General, 2nd Armored Division, stationed at Fort Hood, Texas, about 6 weeks before I left Vietnam.

6. Two weeks or so before I left Vietnam and most probably between 10 and 15 May 1967, I went to General Westmoreland's office to get his signature on a cable summarizing the results of the Ritz and Corral programs. These were the first comprehensive collection programs directed against the

Irregular Forces and the Political Order of Battle located throughout South Vietnam. From August 1965 up until this time, the personnel strength figures reported in the J-2 MACV Monthly Order of Battle Summary for the Political Order of Battle and the Irregulars had remained unchanged. We and the entire intelligence community suspected from the beginning (July 1965) that the number of people in these two categories was much higher than the figures given to us by the South Vietnamese. The South Vietnamese themselves were reluctant to publish the original figures because those figures were incomplete. The South Vietnamese were unable to collect such information. The enemy controlled too much of South Vietnam. At long last, we finally had adequate resources and sufficient control of the countryside to collect this information. My cable was to report the first results which, in my judgment, I could defend. I could have sent the cable without taking it to General Westmoreland. However, in this case, I considered it prudent because of the large increase in our updated figures, and in order to let the commander know that we were at last making significant progress in identifying our enemy in more detail. These were enemy forces who were adversely affecting the accomplishment of our mission. Now our estimates of enemy capabilities would take these new figures into account. To the best of my recollection, the cable estimated a Political Order of Battle at 88,000 and the Irregulars at 198,000.

7. I presented the cable to General Westmoreland about 7 p.m. We were alone in his office. He was seated at his desk.

I expected him to be pleased with our progress. I was surprised by his reaction. He read the cable, looked at me and said: "If I send this cable to Washington it will create a political bombshell." I offered to take it to Washington and to explain it to the appropriate personnel.

8. Instead, General Westmoreland said "Leave it with me. I want to go over it." Although this was the first time that he had ever questioned my intelligence, he certainly had every right to do so, especially since he had not been briefed in detail on our intelligence holdings which we used to accomplish these figures.

9. I have no personal knowledge of what General Westmoreland did with that cable.

10. I have been told that he ~~was~~<sup>did</sup> request and receive a detailed briefing on the information summarized in that cable. To the best of my recollection, I did not attend any such briefing.

11. I told CBS in substance what I have said in paragraphs 1 through 10 above when they interviewed me. I provided the same information to Mr. Adams when he met with me in 1977 in order to discuss his book, which he said he was in the process of writing at that time.

12. The cable I submitted to General Westmoreland contained, to the best of my recollection, an estimate of 198,000 in the Irregular category and 88,000 for the Political Order of Battle. These figures, when added to the figures we were then carrying in our OB, amounted to a total of about 429,000

-- keeping in mind that is adding apples, oranges, bananas and pears and the total represents "fruit" and not one of the specific varieties.

13. To the best of my knowledge, CIA, DIA and CINCPAC intelligence personnel knew that we were attempting to update our holdings on the Irregular and Political OB personnel strengths. These matters had been under review and planning for a number of months. In this regard, I recall answering a request of Mr. Sandine, a Saigon CIA officer, in March of 1967 for my comments on captured enemy notebooks and the possible impact on our Order of Battle holdings. In my reply, I informed him that the subject of Irregular strengths had been receiving priority attention for some time. The comments attached to my memorandum for Mr. Sandine stated: "A thorough review of all information available concerning VC Irregulars has recently been completed. The resultant study contains a province by province estimation of Irregular strengths based on estimates submitted by U.S. Sector Advisors and a review of all captured documents available at CDEC (Combined Document Exploitation Center). The study makes specific reference to Notebooks A and B. Our revised estimate for Irregular strength is approximately 198,000. This estimate may be slightly conservative but is the best documented estimate available. When coordination with DIA has been completed and our strength estimate has been finalized, it will be included in the Order of Battle Summary. In addition, we will publish the complete study, including the VC goals and strengths quoted in the captured enemy documents above."



However, it was not until I presented General Westmoreland with the cable concerning the Irregular and the Political OB that I was willing to put my name to an estimate of the number of people in those categories.

14. No one ever pressured me to change any estimate of enemy personnel strength. I never was pressured for a request to report either higher or lower estimates of the enemy. From time to time, I would hear a rumor that some people in Washington thought that my estimates of enemy strengths were too high. I always felt that my estimates were conservative and valid. I felt then and I still believe that my reporting was as accurate, timely, adequate and useful as we were capable of reporting.

15. In 1977, Sam Adams called me and said he was writing a book on intelligence in Vietnam and asked me to meet with him to discuss my role as J-2 MACV. I met with Mr. Adams in my home and told him substantially what I have said in this affidavit. Mr. Adams told me at the time that he believed that there had been some wrongful manipulation of intelligence figures in Vietnam in 1966 and 1967 and discussed this with me. Before our meeting was over, he told me that I had convinced him that there had been no wrongful manipulation of intelligence while I had been J-2 MACV.

16. In early 1981, Mr. Adams and Mr. Crile called me and asked me to grant them an interview on film concerning intelligence in Vietnam. I did grant them this interview with the stipulation that I would only answer questions concerning my knowledge of events during the 2 years that I was J-2. The

interview took place on March 17, 1981. I told them substantially what I have said here.

17. Two or 3 days after the program was shown on TV, George Crile called me and asked me whether I had seen the program. I answered that I had. He asked me what my feelings about the program were. I told him that I was upset with the way my reply to his hypothetical question had been edited. I told him that the sequence beginning on page 11 of the transcript of the program with the statement from Mr. Wallace -- "Colonel Hawkins assumes full responsibility for his actions. But we went to General McChristian, his old intelligence chief, to ask what we should think of General Westmoreland's instructions. -- Crile: To put a ceiling on enemy strength estimates, to tell an intelligence operation that it is not permitted to report enemy strength estimates over a certain number -- what does that constitute sir?" -- and ending with my statement -- "It's disonorable." -- was, in my judgment, improper because I was not asked "What we should think of General Westmoreland's instructions." The question that Mr. Crile asked me was a hypothetical question. Although I answered this hypothetical question in the context of the interview which was about alleged misrepresentation of intelligence in Vietnam, I did not in any way intend my answer to refer to General Westmoreland. However, the way it was edited made it appear that I was answering a direct question from Mr. Wallace about General Westmoreland's conduct with respect to this matter in Vietnam, and that was not so.

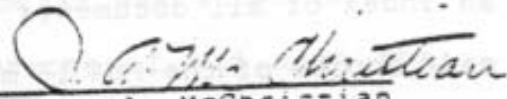
18. While I was J-2, I personally had copies made of the computer tapes which contained Order of Battle information and an index of all documents on the FMA storage system. We also made copies of the FMA 16 millimeter roles of film on which all CDEC documents (originals and translations) were indexed and photographed. These copies of tapes and film were sent on my personal initiative to DIA and CINCPAC. CIA representatives in Vietnam had access to all reports and files of J-2 MACV.

19. General Westmoreland was traveling throughout South Vietnam visiting U.S., Vietnamese and free world forces almost daily. There is no one who knew better the influence of terrain, weather and the enemy on these missions.

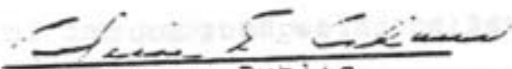
20. I have no personal knowledge of any conspiracy to suppress or alter intelligence on the enemy in Vietnam.

21. Mr. Benjamin improperly characterizes my position when on page 10 of his report he lists me as one of the people supporting the "pro-Adams thesis". I have no personal knowledge of the events which took place in Vietnam after I left on June 1, 1967. Since then I have not been able, based upon my personal knowledge, to confirm nor to refute allegations of events concerning intelligence activities in MACV during the time after June 1, 1967.

22. If requested, I will testify as a witness at trial when General Westmoreland's case comes to trial.

  
Joseph A. McChristian

Sworn to before me  
this 21 day of June, 1983

  
Notary Public

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXPIRES MAY 14 1989  
BONDED INFL GENERAL INS. OF FLORIDA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GENERAL WILLIAM C. WESTMORELAND,

Plaintiff

-against-

CBS INC., et al.,

Defendants.

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: 82 Civ. 7913 (PNL)

: AFFIDAVIT OF  
: PAUL N. McCLOSKEY, JR.

12/27/83

STATE OF CALIFORNIA     )  
                                  )  
COUNTY OF SANTA CLARA    )

PAUL N. McCLOSKEY, JR., being duly sworn, deposes and says:

1. From 1967 to 1982, I served as the Representative to the United States House of Representatives from what is now the 12th District of California. In that capacity, I visited Viet Nam five times: (1) in December 1967 and January 1968 (just prior to the enemy Tet Offensive of 1968); (2) in 1970; (3) in 1971; (4) in early 1975 at President Ford's request (just prior to the fall of Saigon); and (5) late in 1975. On the last occasion I served as the Ranking Republican on a Congressional Mission to negotiate for the return of the remains of our soldiers Missing In Action (MIAs).

2. I received a Bachelor of Arts Degree from Stanford University in 1950. I graduated from Stanford Law School in 1953.

3. I am at present a member of the firm of Brobeck, Phleger & Harrison and a practicing attorney in Palo Alto, California. I reside in Woodside, California.

4. From September 1950 to June 1952, I was in active service in the United States Marine Corps; in 1951, I served as a Marine rifle platoon leader in Korea in the 5th Marine Regiment. From 1952 to 1960, I was an active reserve officer, commanding a Marine reserve rifle company in San Bruno, California. From 1960 until 1965, I studied Marine Corps counter-insurgency tactics which would be used in the event we became involved in Viet Nam. I served on extended active duty in 1964 and 1965. In the summer of 1964 I was Officer-In-Charge of the Reserve Officers Counter-Insurgency School at Camp Pendleton. In February of 1965, I acted as United States Ambassador in Operation Silver Lance, the Marine Corps' largest air-sea-ground exercise since World War II. I retired from the Marines in 1974, with the rank of Colonel.

5. On December 14, 1967 I was elected to the United States House of Representatives. Sworn into office on December 16, 1967, I left immediately after Christmas for Viet Nam as a member of a Congressional Delegation headed by Rep. Alphonzo E. Bell. It was during this tour that I first personally observed the official policy and practice of the Military Assistance Command, Viet Nam, (MACV) under General Westmoreland of providing only "favorable" information to visiting Congressmen and seeking to withhold unfavorable information. In accordance with that policy, our delegation was furnished by MACV with information that was clearly false.



6. During our first day in Viet Nam, our delegation was briefed by a group of officers from the military, CORDS (the pacification program) and the Department of State, in a room at MACV headquarters at Ton Son Nhut Airport, familiarly referred to by MACV personnel as "Pentagon East". We were also briefed by Deputy Ambassador Eugene Locke in his office. The central theme of both briefings was the success that we were having in our pacification and military programs in (a) expanding the areas and number of villages which were "safe," (b) reducing the numbers of Viet Cong, both through military search and destroy operations and through psychological operations (PsyOps) to cause VC infrastructure personnel to "rally" or come over to the RVN side, and (c) interdicting the infiltration of personnel and flow of supplies from North Viet Nam. There was heavy stress on numbers, i.e., body count, crew-served weapons captured, strength of VC units, and particularly the favorable trends in those numbers in every category as compared with three months earlier, a year earlier, etc. I do not recall a single unfavorable trend reported to us, and there was a consistent and strong expression that there was "light at the end of the tunnel," that our "nation building" program was succeeding, that the VC strength was steadily eroding, and that in due course we would be able to return to an advisory status to a strong and stable South Vietnamese government.

7. At our first visit to MACV headquarters in December 1967, I briefly scanned a MACV manual in the waiting room with a title along the lines "Standard Operating Procedure for Handling Visiting Codels [Congressional Delegations]." The manual

explicitly outlined the requirement that CODELs were to be provided only with facts favorable to MACV's performance and directed withholding facts that would make "MACV's mission more difficult." I left the manual for a moment lying open on the table, and it was immediately picked up and taken from the room by one of the staff officers participating in our briefing.

8. Following our day in Saigon where we received the aforementioned briefings, we spent approximately one week in visiting all four Corps Tactical Zones in South Viet Nam, talking to military and pacification people and native South Vietnamese, particularly in rural areas. It became increasingly apparent that much of the factual information we had been given in Saigon was false, particularly with respect to the alleged "progress" and trends in increasing "safe areas," growing Government strength and declining Viet Cong morale and strength. On our return to Saigon, I asked our Embassy escort officer, a Foreign Service Officer II (a rank equivalent to general officer rank), how he had stood by at our initial briefings and allowed two Members of Congress to be given such blatantly false and misleading information. He responded in substance that when the United States Government speaks in Vietnam "it speaks to four audiences: the allies, the enemy, the neutrals and our people back home." I asked him if that meant that he could not tell the truth. He shrugged and nodded.

9. From our overall 8 to 10 days in Viet Nam, it was apparent that lower-ranking U.S. personnel both in military and civilian occupations were under constant pressure to provide detailed reporting of information which could be used by top

commanders to prove that the U.S. effort in South Viet Nam was succeeding. This policy reflected the overwhelming political pressure on MACV at the time from the Johnson Administration. By 1967, and until 1973 when the last U.S. troops were withdrawn and our prisoners returned, a bitter controversy raged in this country over our policies and conduct concerning the war. From the military's standpoint, and from the standpoint of President Johnson (and later President Nixon), it was essential to maintain congressional (and public) support for the war. This support could be obtained only if the public and the Congress could be convinced that there was "light at the end of the tunnel." On this basis, the commanders justified the release to both Congress and the public of only such information as was favorable and further justified the suppression of factual information which might cause doubt as to the success of U.S. efforts.

10. By December, 1967, when I visited South Viet Nam, individual members of Congress were beginning to debate the limiting of funds for Viet Nam and the need to commence withdrawal of U.S. Forces. MACV's policies and practices with respect to the deception of Congress were not surprising: The "national security," i.e., the need to retain public support for the Viet Nam war, was used to rationalize a conspiracy to deceive in which General Westmoreland participated. The rules of Nuremberg had been forgotten, and post-Watergate ethics were still in the future. A military establishment which was ordered by the White House to conceal massive bombing of the neutral countries of Laos and Cambodia could scarcely rebel at promoting public and political support of the way by concealing North

Vietnamese infiltration figures or removing the Self-Defense and Secret Self-Defense Forces from the Enemy Order of Battle. The goal, continuing the favorable trend in reporting, required deception; and from General Westmoreland's standpoint, it was undoubtedly deemed essential to performing the tasks he was ordered to do, i.e., winning the war, in accord with the morality of the time as he saw it.

11. The Self-Defense and Secret Self-Defense Forces of the Viet Cong played an important role in Viet Nam. By way of example, in one particular area of Viet Nam that I visited in early 1970, in a valley southwest of Viet Nam, those forces were instrumental in effectively confronting a full Marine Regiment, the 5th Marines. The regiment was spread out over a large area which had formerly included highly productive villages and rice paddies, but had been cleared earlier by "cattle drive" or "rice denial" operations by the Marines. There were numerous women, old men and children in the area, who, I was told, set booby traps, mines and punjie stakes, but there were few organized VC units and there was little NVA regular force support. Nevertheless, in 1969, the 5th Regiment had suffered 1,277 wounded (over half its riflemen strength), many of them amputees. I was told that most of these casualties resulted from booby trap incidents rather than fire fights. When I visited the area in early 1970, I was advised that I could not leave the regimental command post to visit the battalion or company command posts, because foot travel was unsafe due to the booby traps set by people in the enemy's Self-Defense forces. The deletion of these forces from the Enemy Order of Battle was therefore highly



misleading, and resulted in a serious understatement of the strength of the enemy we were facing. General Westmoreland's defense of this decision-- that these forces included many women, old men and children and had little to do with the outcome of the war--is hollow and misleading.

12. I first met Samuel Adams, more than a decade ago. He came to my congressional office to express his concern that U.S. military and civilian officials in Viet Nam were deliberately concealing the true strength of the enemy. He also feared that the precedent of having intelligence distorted for political or public relations could be a future disaster for the nation. I was convinced at that time and remain convinced that Mr. Adams's efforts to bring to light the facts surrounding the deception of the American public and Congress were undertaken for completely patriotic and professional motives: specifically, the need for absolutely truthful information in intelligence gathering and analysis so that decision-makers would not be misled.

13. I have read the transcript of the CBS Special Report, "The Uncounted Enemy: A Vietnam Deception", and the transcript of a press conference held by General Westmoreland and several of his supporters on January 26, 1982. Based on my recollections of the matters addressed in the broadcast and on my review of the notes I took during my visits to Vietnam in 1967-68, 1970 and 1971 (as described above), I believe that "the Uncounted Enemy" was accurate and that the denials and arguments made by General Westmoreland and his supporters at their press conference were hollow and misleading. The broadcast neither

misstated nor improperly characterized the facts as I understand them.

14. On February 1, 1982, I sent George Crile, the producer of "The Uncounted Enemy", a letter setting forth certain observations about the CBS Special Report and the denials and arguments made by General Westmoreland and his supporters at their January 26, 1982, press conference. The observations in that letter, a true copy of which is annexed hereto as Exhibit A, accurately reflected my knowledge and belief as to the matters I addressed at that time, and I believe those observations to be sound and accurate today.

*Paul N. McCloskey, Jr.*  
Paul N. McCloskey, Jr.

Sworn to and subscribed before me this 33<sup>rd</sup> day of December 1983.

*Vicki D. Gardiner*  
Notary Public

GENERAL ACKNOWLEDGMENT

NO. 2

State of California  
County of Santa Clara } ss

On this the 23<sup>rd</sup> day of December 23 1983, before me,

Vicki D. Gardiner

the undersigned Notary Public, personally appeared

Paul N. McCloskey, Jr.

personally known to me  
 proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is subscribed to the within instrument, and acknowledged that he executed it. WITNESS my hand and official seal.

*Vicki D. Gardiner*  
Notary's Signature

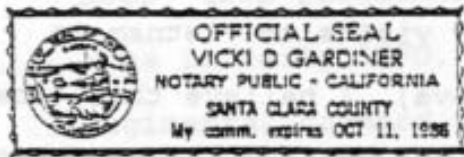




EXHIBIT A is DX 8.

B-456

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
GENERAL WILLIAM C. WESTMORELAND,

Plaintiff,

-against-

CBS INC., et al.

Defendants.  
-----

82 Civ. 7913 (PNL)

AFFIDAVIT OF  
CAROLYNE J. McDANIEL

STATE OF NEW YORK, )  
                          ) ss.:  
COUNTY OF NEW YORK,)

CAROLYNE J. McDANIEL, being duly sworn, deposes  
and says:

1. I was employed as a production secretary by  
CBS News from May of 1981 until January of 1984. When I  
began working for CBS Reports, I was assigned specifically  
to producers George Crile, Craig Leake and Judy Reemtsma.

2. From May 1981 until August 1981, I worked as  
production secretary for George Crile who was at that time  
producing a documentary which was ultimately broadcast in  
January 1982 as the CBS Special Report "The Uncounted Enemy:  
A Vietnam Deception" (hereinafter referred to as "the  
documentary"). In August of 1981, Alex Alben, the broadcast  
researcher on the documentary, was preparing to return to

law school in California. Due to the facts that (1) the bulk of the research on the documentary had been completed, (2) I had become familiar with the extensive research files and (3) I had completed several minor research projects to Crile's satisfaction, it was determined by Crile, with Executive Producer Howard Stringer's approval, that I would become Crile's assistant in addition to keeping my production secretarial responsibilities. Craig Leake was assigned another production secretary, in order to lighten my workload. I continued to have limited responsibilities for Judy Reemtsma's production secretarial needs.

3. The minor research projects to which I was assigned were closely monitored by producer Crile. These projects included such activities as verifying dates; searching for news stories which might contain useful film footage; obtaining photo stills; obtaining transcripts of speeches made by various political figures; locating individuals whom Crile wished to interview; and compiling articles from news periodicals which demonstrated press reaction to the 1968 Tet Offensive. In addition, since the offices of Producer Crile and Associate Producer Joe Zigman and the research area for the production unit were located in a different area of the building than the cutting rooms, I would often deliver information and carry messages from the producer's office to the cutting rooms. Much of my time

was spent in Crile's office, as well as with my colleagues in the cutting room.

4. Producer Crile, consultant Sam Adams and broadcast reseacher Alex Alben, and associate producer Joe Zigman, the people primarily responsible for researching the documentary, conducted an extremely conscientious and thorough investigation of the intelligence controversy which was the subject of the documentary. All four were exceptionally painstaking and meticulous in their attention to detail and amassed tremendous knowledge and expertise about the subjects the documentary reported on.

5. I was familiar with the outline for interviews for the documentary which George Crile prepared to assist Mike Wallace in conducting certain interviews. I recall being consistently impressed by the extent to which Mr. Wallace conducted the interviews independently of these outlines and pursued his own lines of questioning, using the outlines as a reference, not a rigid script.

6. During 1981 I made repeated efforts to contact General Phillip Davidson by telephone. All of these attempts were unsuccessful. George Crile told me at the time the documentary was being produced that he believed that General Davidson was quite ill.

7. During most of the period of production of the documentary, the mood of the entire production team was one

Klein's endless complaining--which always seemed to focus on of pride, cooperation and creative exhilaration, in an atmosphere in which frank discussion of the unfolding documentary was not only allowed but encouraged by producer Crile. Inevitably, with the deadline for completion of the project fast approaching, tensions on the production unit increased at the end of 1981. Producer Crile, responsible for completing the documentary, assumed a much stronger leadership role. The increased tension on the production unit was due to the long hours and other irritants which attend a tough schedule. Personality conflicts developed under the pressure of meeting the deadline, particularly between Ira Klein, one of the film editors (a second film editor, Joe Fackovec, was added to the project to help with the workload), and producer Crile. To a somewhat lesser extent, Phyllis Hurwitz, Klein's assistant, became irritated with Crile. I attributed these personality conflicts to fatigue and bruised egos. In particular, Klein would become angry when Crile would make an editorial decision not to use some piece of film on which Klein had worked. These conflicts were made worse by the long hours which the members of the production unit had to work in the final months of the documentary's production.

8. As a result of these personality conflicts, disparaging remarks about Crile's personality, his privileged background and the pressure he put on the production



team to work long hours were made frequently by Klein and Hurwitz--and on occasion by myself as well.

9. At no time, however, did film editor Klein, his assistant Hurwitz or I criticize the substance of the documentary or the methodology used to obtain evidence. The three of us had our own very specific and limited areas of expertise, and neither individually nor collectively did we have enough comprehensive understanding of the intelligence controversy to offer reasonable and informed debate on the issues. Occasionally, we would complain to each other regarding Crile's decision to use limited battle footage in the documentary--we wanted more--or his decision not to use a segment of jungle sniping footage meticulously prepared by Klein. But never was serious editorial criticism presented by the three of us to Producer Crile, nor was any criticism made of the accuracy or validity of the statements made in the documentary by anyone on the production unit. In any event, our criticisms (Klein, Hurwitz and I) never held more authority than that of a "hunch"--and George Crile was not interested in "hunches" which were not backed up by solid evidence.

10. Ira Klein, like all of us, had always been aware of an "open door policy" for complaints at CBS, both during and after the airing of "The Uncounted Enemy". In the final weeks of production, after becoming fatigued by

Klein's endless complaining--which always seemed to focus on George Crile personally rather than on specific issues affecting the documentary's accuracy--I even encouraged Klein to take his complaints to CBS News management if he believed he had any complaint of substance; to my knowledge, he never did.

11. In the latter weeks of production of the documentary, Klein's behavior became sufficiently erratic that he almost seemed to be trying to sabotage the documentary. For example, in the course of my duties as Crile's assistant, I discovered minor factual errors and misreadings of voice-overs which required correction--and were ultimately corrected before the documentary was aired. I became extremely concerned when, upon my informing Klein of these minor problems, Klein told me that I was "overstepping my responsibilities", that it was "George's responsibility to find errors" and that I should keep the information to myself and let Crile take the blame for any errors.

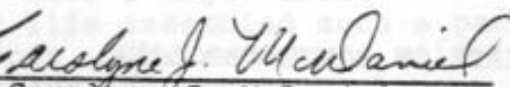
12. Not until after the Westmoreland press conference following the broadcast of the documentary did Ira Klein voice any criticism of the substance of the documentary or show any serious interest in examining the voluminous contents of the research files for the documentary. I had always had permission from Crile to allow anyone on the production team access to these files. After Klein

suggested editorial problems after the broadcast, I told him that if he were able to locate and prove any editorial flaws, then he should "go to it" and that he could "be my guest" in examining materials in my files and in Crile's office--since my loyalty then, as now, was to uncovering the truth.

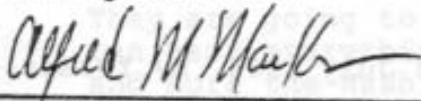
13. Ira Klein has developed an overwhelming and obsessive hatred for George Crile. Indeed, Klein has told me personally of his desire to undermine Crile's career. By the final weeks of the documentary's production, Klein's anger at George Crile had become more important to Klein than the final product on which we were working, and I could no longer depend on Klein for collegial support. During those weeks, and in the aftermath of the broadcast, Klein's accounts of events became more and more vituperative and exaggerated, from one telling to the next. I believe that Ira Klein is a sensitive, creative, imaginative person, but I also believe he somehow lost his sense of balance, his judgment and his objectivity under the strains and pressures. It is regrettable that Klein's personal vendetta against Crile has entered so prominently into what should be a proper and judicious examination of the issues raised by the broadcast.

14. Above all else, I believed at the time the documentary was aired and I believe today that the evidence

overwhelmingly supports the accuracy of "The Uncounted Enemy: A Vietnam Deception". It is a documentary which has contributed greatly to our understanding of the problem of distortion of the intelligence process resulting from political pressure. I am proud of the documentary, and proud to have had a part in its production, for I believe it to be one of the finest and best documented news documentaries ever produced at CBS.

  
 Carolyne J. McDaniel

Sworn to and subscribed  
 to before me this 23rd  
 day of April 1984.

  
 Notary Public

**ALFRED M. MARKS**  
 Notary Public, State of New York  
 No. 31-7722200  
 Qualified in New York County  
 Commission Expires March 30, 1986

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
GENERAL WILLIAM C. WESTMORELAND, :  
 :  
 : Plaintiff, : 82 Civ. 7913 (PNL)  
 :  
 : -against- : AFFIDAVIT OF  
 : DOROTHY MEACHAM  
CBS INC, et al., :  
 :  
 : Defendants. :  
 :  
-----

STATE OF SOUTH CAROLINA, )  
 )  
COUNTY OF CHARLESTON, ) ss.:

DOROTHY MEACHAM, being duly sworn, deposes and  
says:

1. Between July 1967 and July 1968, my former  
husband, James A. Meacham, served in Vietnam as an intelligence  
officer. During that time, he wrote me 311 numbered letters,  
which included descriptions of the preparation of enemy strength  
reports for the U.S. Military Assistance Command Vietnam ("MACV).

2. In describing the preparation of those enemy  
strength reports, my former husband wrote, inter alia,

"You should have seen the antics my people and I  
had to go through with our computer calculations to  
make the February enemy strength calculations come out  
the way the general wanted them to. We started with  
the answer and plugged in all sorts of figures until  
we found a combination the machine could digest, and  
then we wrote all sorts of estimates showing why the  
figures were right which we had had to use. And we  
continue to win the war." (Letter No. 223.)



"[O]ne can have no small comprehension of the mismanagement of this goddam war unless he has seen the outright lies and machinations of MACV. I'm not talking about confusion and inefficiency which to a certain extent are products of all wars, but about muddle-headed thinking, cover-your-ass orders, lies and outright foolishness on the very highest levels. The crime is that you couldn't tell anyone if you wanted to -- no one would believe it, the place is so utterly incredible." (Letter No. 230.)

"Was late getting back tonight. We had a crash program to prepare a briefing for the press on enemy strength as of 29 Feb - complete with viewgraphs. Got it at about 4 - due at noon tomorrow. Anyhow I stayed until about 8 and wrote it and graphics buds are working on the slides--they have a night shift anyway. I have never in my life assembled such a pack of truly gargantuan falsehoods. The reporters will think we are putting on a horse and dog show when we try to sell them this crap." (Letter No. 231.)

"About a nothing day today. In spite of the fact that we had some visitors from DIA, I took off. They are going to be here until Wednesday, and they can hear everything I have to say in 15 minutes. More and more the Washington bunch is beginning to dig into this strength business, and they are beginning to smell a rat, I think. Someday it may come out how we have lied about these figures." (Letter No. 303.)

"Today has been a kind of ikked up day. The types from DIA were here and badgered me endlessly trying to pry the truth from my sealed lips. They smell a rat but don't really know where to look for it. They know we are falsifying the figures, but can't figure out which ones and how. More tomorrow and Wednesday." (Letter No. 304.)

"Mucked about in office all day today. I must start checking out tomorrow if I am to avoid a last minute hassle. I had a talk with the CICV director today and let him know the truth about the doctoring of the strength figures. Now my conscience is clear. He knows the score--whether or not he acts to straighten things out is now his concern. It's out of my hands. (One's conscience isn't much, I think, when it can be assuaged that easily!) Anyhow, that's over with." (Letter No. 311.)

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3. My former husband was at times reluctant to put more in his letters. He wrote to me at one point:

"No solution, of course, we just found a way to postpone the inevitable day of reckoning. I hope it comes after I am gone, because the roof may fall in. I can't say more--I'll explain when the war is over."  
(Letter No. 259, p. 6.)

However, when he returned from Vietnam, he told me more about his dissatisfaction with his experience in Vietnam.

4. Based on the letters that I received from my former husband, and on our conversations following his return from Vietnam, it is my personal opinion that my former husband was dissatisfied about the compilation of estimates of enemy strength. I do not believe that he would have exaggerated the situation in his letters to me, as I regarded him as an objective observer. His college training was as a journalist. He would have described, and I believe did describe, the situation to me in an accurate manner. The falsification of enemy strength estimates described in my former husband's letters to me was a matter about which he felt strongly.

5. I saved the letters that my former husband wrote to me from Vietnam because he felt and told me that some day they might be of historical importance.

6. In December 1977, I sent the letters to Sam Adams, who was interested in uncovering the truth about the estimates of enemy strength during the Vietnam War. Sam learned about the letters from my former husband, who suggested that Sam

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contact me to obtain the letters. Sam later returned the letters to me. I knew that Sam had made copies of the letters. The originals of those letters have now been turned over to CBS for use in this case. I understand that after the trial, they will be returned to me.

*Dorothy Meacham*  
Dorothy Meacham

Sworn to and subscribed before me)  
on this 15<sup>th</sup> day of March 1984 )

*Jeanette Anderson Weir*  
Notary Public for S.C.  
My commission expires 10/18/92



as a political analyst specializing in Far Eastern developments. I was assigned to Vietnam in December 1965. I was a current intelligence officer working with the DOI contingent. I worked out of the U.S. Embassy in Saigon under Army cover until July 1967. Later that year I was assigned to work at the National Indications Center as a CIA staff member for the Watch Committee of the U.S. Intelligence Board, a body which reported to the National Security Council. The Watch Committee's purpose was to warn of potential hostile actions against the United States and its allies. I worked with the Watch Committee until <sup>August</sup> ~~July~~ 1970, at which time I left the CIA and resumed my graduate studies.

4. After completing post-graduate work and teaching at Cornell University, I assumed my present post as Assistant to the Dean and University Registrar at Susquehanna University. In 1980-81 I served as Chairman of the Ethics Committee of the Middle States Association of Collegiate Registrars and Officers of Admission. I am a member of the American Association of Collegiate Registrars and Admissions Officers. I am an Elder in the United Church of Christ and a leader in a number of local community and church social action organizations.

5. Since 1954, I have served with the U.S. Army, either on active duty or as a member of the reserves. I am currently a Lieutenant Colonel in the U.S. Army (Reserve). My military specialization is that of Strategic Intelligence Staff Officer.

6. In 1968 I received the U.S. Army Medal for Civilian Service in Vietnam. In 1970, I received a Distinguished Service Citation for my work at the National Indications Center.

7. As part of my duties as a CIA intelligence analyst in Saigon from December 1965 to July 1967, I reviewed military reports, captured enemy documents and POW interrogation reports to detect trends in enemy activities which I then reported to my superiors. To accomplish this task, I reviewed scores, if not hundreds, of documents each day.

8. While in Saigon, I came to know both George Allen and Samuel Adams. Allen and Adams both had excellent reputations within CIA as careful, thorough and highly competent analysts who were experts on the Vietcong.

9. In the fall of 1966, I began to come across captured documents from COSVN which indicated that the number of enemy Irregulars (guerrillas, self-defense militia, and secret self-defense militia) was far higher than the figure then being reported in the official MACV Order of Battle. Since the Vietnam War was essentially a "guerrilla" war, I considered the information that these documents contained to be extremely important because these documents indicated that the enemy we faced was much larger than we had realized. The MACV enemy Order of Battle figure for this category, I recall, had been essentially constant for some time.



10. In October 1966 I wrote a memorandum which detailed these documents and their evidence of far greater enemy strength in the irregular category than was being officially reported in the MACV enemy Order of Battle. I handed the memo to my immediate superior in the Saigon Station, Marcus Kostalich. I recommended to him that the memo be disseminated to analysts at DIA and CIA headquarters in Langley, Va. Instead of distributing the memo, however, Kostalich suppressed it, commenting, "MACV is already looking into it". To my knowledge, the memorandum was not distributed to anyone. While I was disturbed by Kostalich's cavalier attitude towards what I considered to be a very important intelligence finding, I took him at his word. I assumed that the matter was being pursued elsewhere.

11. In December 1966 I returned to the United States for home leave. Wondering whether CIA Headquarters was aware of the documents I had found which indicated a far higher strength for enemy irregulars, I used part of my leave to go to CIA Headquarters, Langley, Va., to confer with CIA analysts who worked on the Vietcong and to discuss my findings. Among those I talked to were George Allen and Sam Adams. I found to my relief and surprise that Adams had independently discovered many of the same documents and had reached the same

conclusions as I--that they showed there were far more enemy irregulars than were being carried in the official MACV enemy Order of Battle. Adams told me that he too had experienced resistance on the part of his superiors to accept this "unfortunate" news. Confident that analysts back home were at least aware of the discrepancy between MACV's official estimates and the much higher figures cited in captured enemy documents for the total irregular strength, however, I dropped the matter upon my return to Saigon.

12. In my view the enemy's self-defense and secret self-defense forces belonged in the official Order of Battle as part of the enemy's total strength. These forces could not be ignored in assessing and explaining the capabilities and strength of the enemy. They were not only a definite military factor, but also played important roles in recruiting and in replacing losses in Regional and Local forces during offensives. This pool of reserves, in turn, permitted the Regional and Local forces to provide replacements for Main Force units. Without an understanding of this mechanism, one could not understand a major element of the enemy's military strength. On a day-to-day basis, our troops often dealt more often with self-defense and secret self-defense forces than with Main and Local forces.

13. In the fall of 1967, I was assigned to the National Indications Center in Washington, D.C., to work on the staff of the Watch Committee of the U.S. Intelligence Board, a

body which reported to the National Security Council. The Watch Committee was comprised of representatives from various segments of the U.S. intelligence community, including the Central Intelligence Agency and the Defense Intelligence Agency. The Watch Committee was responsible, inter alia, for predicting potential military disasters or future "Pearl Harbors"

14. From late fall 1967 through January 1968, those of us on the Watch Committee staff saw an accumulation of compelling evidence in captured enemy documents and POW interrogation reports and other intelligence that the enemy was preparing for a massive offensive around the time of the Tet holiday. I recall evidence that the rate of infiltration into South Vietnam rose significantly during this period. We put this information and other indicators of an impending major enemy attack during the Tet holiday into every weekly draft report, only to see it excised from the final version which the Watch Committee circulated to the National Security Council and others. Each week, DIA representatives on the Watch Committee demanded that that information not appear in the final report approved for circulation by the Committee. The DIA representatives claimed that the enemy was incapable of mounting a large scale offensive because the enemy was running out of troops. They cited the optimistic reports coming from the MACV command in Saigon as support for their position. However, they offered no evidence contrary to the documentary evidence on which we staff members had based our prediction. Our analysis predict-

ing the Tet Offensive never was permitted to appear in the weekly Watch Committee reports approved for circulation. The chairman of the Watch Committee, a senior CIA staff member who represented the Director of Central Intelligence, did not press DIA representatives on this matter on any occasion. Verbatim transcripts of discussions at these meetings were taken and tape recordings were made, and it is my understanding that they were placed in USIB or CIA archives, as were the draft and final Watch Reports.

15. It was during this period that I finally came to understand the significance of the suppression of my earlier memorandum laying out the evidence of far greater enemy strength in the irregular category than was being officially reported in the MACV enemy Order of Battle. It was our impression that the MACV command was using official reports of total enemy strength as propaganda to support the supposed "progress" we were making in the war effort. Conversations with other analysts confirmed that they believed MACV and DIA had been "stonewalling" on this vital matter--that MACV had placed a ceiling on the total enemy strength figures they would approve.

16. Based on my experience as a CIA analyst, I have become convinced that there was a conspiracy or cover-up among various elements of the intelligence community, including persons from MACV, CIA and DIA, to distort and to suppress intelligence

information during the months prior to the Tet Offensive so that the American public would have the impression that we were winning the war. Ironically, that intentional distortion of the intelligence process had a disastrous effect upon the war effort. The Tet Offensive came as a complete surprise to the American public: If we in the intelligence community had been permitted to provide accurate intelligence or, at the very least, the full information we had available to us, the American public would have been better prepared to deal with the Tet Offensive.

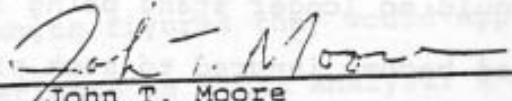
17. I felt a great sense of frustration during my tenure as an analyst in Vietnam and at the National Indications Center in Washington, D.C. I witnessed repeated distortions of the intelligence process because of what I perceived to be the preoccupation of some superiors with political considerations. I believed and still believe that the accuracy of intelligence information is extremely important. I left the CIA in July 1970 because I could no longer stand being in a bureaucracy which was lying to our government and public, and I could no longer stand being in a situation in which many analysts had become innured to such practices, acquiescing in order to further their careers or to put in their time until retirement. I would not remain part of such a system and decided to return to academic studies.



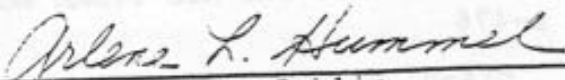
18. On October 18, 1975, I wrote a letter to The New York Times (which was published) expressing my views on Sam Adams' charges of corruption in the intelligence process during the Vietnam War. A copy of that letter is attached to this affidavit as Exhibit I. I believed that letter to be true and accurate at the time I wrote it, and I believe that letter to be true and accurate today.

19. On June 23, 1975, I wrote a letter to the editor of Harper's Magazine relating my views on Sam Adams' article "Playing Games with Numbers", which appeared in the May 1975 issue of Harper's. A copy of that letter is attached to this affidavit as Exhibit 2. I believed that letter to be true and accurate at the time I wrote it, and I believe it to be true and accurate today.

20. In the winter of 1975 and the summer of 1981, I met with Samuel Adams to discuss my experiences as a CIA analyst. In the summer of 1981, I spoke with George Crile about my experiences as a CIA analyst. I told both Mr. Adams and Mr. Crile in words or in substance that which is contained in ¶¶ 1-19 above.

  
\_\_\_\_\_  
John T. Moore

Sworn to and subscribed before  
me this 30<sup>th</sup> day of November 1983

  
\_\_\_\_\_  
Notary Public

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EXHIBIT 1 is JX 346.

DAVID C. HORDAN, being duly sworn, deposes

1. I am a retired United States Army

Colonel residing at 355 Naples Street, San Diego, California 92111.

2. I entered the Army in July 1941, and

commissioned as a second lieutenant, Infantry, in

1941. During World War II, I served with the 25th

Infantry Division in capacities ranging from Platoon

and Company Commander. I was released from

service in November 1945, and recalled in October 1950

to serve in Korea with the 40th Infantry Division.

I served at the company, regiment and division levels. In 1951

affidavit is Exhibit 1. I believed that is accurate at the time I wrote it, and I believe and subscribe today.

**EXHIBIT 2 is JX 472.**

In the winter of 1978 and the summer of 1981, I spoke with several individuals to discuss my experiences as a CIA analyst. In the summer of 1981, I spoke with Mr. and Mrs. Galle in words or in substance that is still in my mind.

*John T. ...*  
John T. ...

Sworn to and subscribed before me this 30<sup>th</sup> day of November 1981

*William K. ...*  
Notary Public

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