EXHIBIT 16

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UNITED STATES DISTRICT COURT
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2
          NORTHERN DISTRICT OF CALIFORNIA
3
                   OAKLAND DIVISION
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6
    VIETNAM VETERANS OF
7
    AMERICA, et al.,
                              )
8
             Plaintiffs,
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        vs.
                              ) No. CV 09-0037-CW
    CENTRAL INTELLIGENCE
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    AGENCY, et al.,
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             Defendants.
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         Deposition of MARTHA HAMED, taken at
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17
         2000 Pennsylvania Avenue Northwest,
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         Suite 6000, Washington, DC, commencing
         at 9:03 a.m., Thursday, July 7, 2011,
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20
         before Carmen Smith, Notary Public.
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22
    PAGES 1 - 266
23
    PAGES 85-237; 244-251 ARE CONFIDENTIAL
24
    SUBJECT TO THE PROTECTIVE ORDER AND
25
    BOUND UNDER SEPARATE COVER
                                            Page 1
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1	Q Have you ever seen it before?
2	A No, not to my knowledge.
3	Q Has anyone in your office ever spoken
4	about the chief of staff memorandum 385, Office of
5	Information Management?
6	A When I was working? No.
7	Q Did anyone at your office speak about the
8	Wilson memorandum?
9	A Not in my presence.
10	Q Do you know if your office did anything to
11	comply with the chief of staff memorandum 385?
12	A The Office of the Secretary of Defense
13	does not comply with directives from the Department
14	of the Army. Or they did not while I worked there.
15	Q Do you know if your office did anything to
16	comply with the Wilson memorandum?
17	A The Office of the Secretary of Defense
18	does not comply with directives from the Department
19	of the Army.
20	Q Let me refer you to page 427, which is
21	after tab 9 of section B. This document ranges from
22	427 to 428 and is dated April 5, 1994.
23	A Wait a minute. I'm on are you
24	saying I'm on page 427. Is that what you're
25	I'm sorry, I'm not drifting. I'm drifting.
	Page 175

1	Arsenal regarding mustard gas testing conducted from
2	1955 to 1965?
3	A I looked for mustard gas, to any mustard
4	gas testing they were doing. I don't recall finding
5	a lot of 19 I don't recall finding any 1955
6	to '65 mustard gas testing.
7	Q Are you aware of something called Army
8	regulation 7025?
9	A I have no idea what you're talking about.
10	Does it have a title?
11	Q Army regulation 7025 titled "Use of
12	Volunteers as Subjects of Research."
13	Do you know what that is?
14	A No, I do not.
15	Q Has anyone in your office ever discussed
16	Army regulation 7025?
17	A Not that I can recall.
18	Q Were ever any meetings held with regard to
19	Army regulation 7025?
20	A Not that I recall.
21	Q Did your office do anything specifically
22	to comply with provisions within Army regulation
23	7025?
24	A The office of the Secretary of Defense
25	does not comply with Army regulations.
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1	CERTIFICATE OF NOTARY PUBLIC & REPORTER
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3	I, CARMEN SMITH, the officer before whom the
4	foregoing deposition was taken, do hereby certify
5	that the witness whose testimony appears in the
6	foregoing deposition was duly sworn; that the
7	testimony of said witness was taken in shorthand and
8	thereafter reduced to typewriting by me or under my
9	direction; that said deposition is a true record of
10	the testimony given by said witness; that I am
11	neither counsel for, related to, nor employed by any
12	of the parties to the action in which this
13	deposition was taken; and, further, that I am not a
14	relative or employee of any attorney or counsel
15	employed by the parties hereto, nor financially or
16	otherwise interested in the outcome of this action.
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21	Notary Public in and for the
22	District of Columbia
23	
24	Commission Expires: MARCH 14, 2013
25	·
	Page 265
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