

STATE OF NEW YORK
COUNTY OF SARATOGA

NOW COMES BEFORE ME, Notary Public, Susan Belanger, a person of the age of majority who is known to me or who has provided sufficient identification, who after being duly sworn, does depose and say.

I have served as the Special Projects Director of the Blue Water Navy Vietnam Veterans Association (BWNVVA) since 2007. In that capacity I have conducted extensive research into the infiltration of Agent Orange into the bays, harbors and territorial seas of the former Republic of Vietnam otherwise known commonly as South Vietnam. In this capacity I have furnished research information to the Executive Director as well as other veterans organizations, Congressional staff members and individual veterans. These duties have required me to liaison with former members of the Royal Australian Navy, including Commander Peter Burns a retired engineer of her Majesty's Australian Navy.

Since December 28, 2012, I have also served as an advisory board member of Military-Veterans Advocacy (MVA) Inc. Since August 13, 2013, I have served as the Deputy Chief of Staff for Congressional Liaison. In this capacity I schedule visits to Congressional offices, conduct email campaigns in support of MVA's initiatives, respond to inquires from Congressional staffers and conduct research for the Executive Director and various Congressional staffs on the subject of the infiltration of Agent Orange into the bays, harbor and territorial seas of the former Republic of Vietnam otherwise known commonly as South Vietnam.

I am aware that prior to 2002 the presumption of exposure was afforded to those who served on ships within the Vietnam Service Medal area, a line drawn roughly 100 nautical miles seaward of the mainland of both North and South Vietnam and reflecting the area landward of the bold line drawn on Exhibit B. Commencing in 2002, the American VA denied the presumption of exposure to those who could not show that they had actually set foot in Vietnam. This became known colloquially as the "Boots on the Ground" requirement.

I am also aware that commencing in 2003, the Australian government granted the presumption of exposure to a similar area, 185.2 kilometers from the mainland of both North and South Vietnam.

As part of my responsibilities to both BWNVVA and MVA I have researched and maintain, in the normal course of business, the following documents that have been made available for the litigation entitled *Blue Water Navy Vietnam Veterans Association et. al. v. Shinseki*, currently pending in the United States District Court for the District of Columbia docket #1:13-cv-01187 EGS:

I have verified that Exhibit A reflects HR 543 currently pending before the 113th Congress.



I have verified that Exhibit B constitutes an excerpt from a Department of State publication *Limits the Seas No. 99 Straight Baselines: Vietnam* published in 1983. The lines plotting the territorial seas and the Vietnam Service Medal area were plotted by my husband, Ernest Belanger, a former Aerographer's Mate in the United States Navy who was qualified by the Navy to plot navigational charts.

I have verified that Exhibit C represents a photograph of the Mekong River discharging into the South China Sea, taken from the International Space Station on October 24, 2006 and is used in presentations to Members of Congress and their staffs by BWNVVA and MVA.

I have verified that Exhibit D is a declaration by Dr. Robinson Hordoir, a Swedish hydrologist who has studied the effects of the Mekong River and has been used for background information by officials of BWNVVA and MVA.

I have verified that Exhibit E is a study by Eric Wolaski and Nguyen Huu Nhan entitled *Oceanography of the Mekong River Estuary* and has been used for background information by officials of BWNVVA and MVA.

I have verified that Exhibit F is a study by Weifang Cheng and others entitled *Signature of the Mekong River Plume in the Western South China Sea Revealed by Radium Isotopes* and has been used for background information by officials of BWNVVA and MVA.

I have verified that Exhibit G is a study by the New Jersey department of Environmental Protection entitled *2,3,7,8-Tetrachlorodibenzo-p-Dioxin (TCDD) and 2,3,7,8-Tetrachlorodibenzo-p-Furan (TCDF) In Blue Crabs and American Lobsters from the New York Bight* and has been used both for background information and for presentations to members of Congress and their staffs by BWNVVA and MVA.

I have verified that Exhibit H is a study by D. S. Pavlov and others entitled *Present-Day State of Coral Reefs of Nha Trang Bay(Southern Vietnam) and Possible Reasons for the Disturbance of Habitats of Scleractinian Coral* and has been used both for background information and for presentations to members of Congress and their staffs by BWNVVA and MVA.

I have verified that Exhibit I is the Executive Summary of a study commissioned by the Australian Department of Veterans Affairs entitled *Cancer Incidence in Australian Vietnam Veterans Study 2005* and has been used both for background information and for presentations to members of Congress and their staffs by BWNVVA and MVA.

I have verified that Exhibit J is the Executive Summary of the National Research Centre for Environmental Toxicology (ENTOX) and Queensland Health Services (QHSS) study commissioned for the Australian Department of Veterans Affairs entitled *EXAMINATION OF THE POTENTIAL EXPOSURE OF ROYAL AUSTRALIAN NAVY (RAN) PERSONNEL TO POLYCHLORINATED DIBENZODIOXINS AND POLYCHLORINATED DIBENZOFURANS VIA DRINKING WATER*, a study that has been reviewed and validated by two separate Committees of the Institute of Medicine and has been used both for background information and for presentations to members of Congress and their staffs by BWNVVA and MVA.

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I have verified that Exhibit K is a Google Earth image of Da Nang Harbor with an image date of February 2, 2010 and is used in presentations to Members of Congress and their staffs by BWNVVA and MVA.

Additionally, based on my research I determined that the Center for Disease Control conducted studies in 1990 concerning Vietnam Veterans entitled *The Association of Selected Cancers in US Military in Vietnam*. This particular study finds that non-Hodgkin's lymphoma was higher among men in the "sea-based Navy" than among other veterans and is consistent with studies conducted by the Australians.


Although the Department of Veterans Affairs has questioned whether the same type of distillation equipment was used by Australian ships as American ships, the systems were identical. Many Australian ships were built in the United States including the *Charles F. Adams* class guided missile destroyers. The system showed in the American Navy's Principles of Naval Engineering is the same system studied by the Australians in arriving at their determination that the process actually enriched the Agent Orange, co-distilled it and contaminated the distillation and potable water system.

I have reviewed the attached deposition of Commander Peter Burn, OAM, Royal Australian Navy (Rtd) , currently serving as an Advocate Veterans Advice & Advocacy Service (ACT) and verify that it is the same document that he provided to me via electronic mail.

Affiant further sayeth naught.


Susan Belanger

SUBSCRIBED TO AND SWORN BEFORE ME, Notary Public, this 25 day of November 2013.


Notary Public

My Commission expires: Dec 02, 2014

TINA NADEAU
Notary Public, State of New York
Reg. No. 0-110004003
Qualified in Saratoga County
My Commission Expires December 2, 2014