

EXHIBIT 16

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

CHARLES F. SMITH,

Plaintiff,

v.

KENNETH FELD,

Defendant.

Civil Action No. 98-357-A

CW/Pit. Def. 1379
Date 3-15-06
Judge
Case # 220181 and
204452

L204452/L220181
Plaintiff's Exhibit
1379

AFFIDAVIT OF CLAIR E. GEORGE

1. My name is Clair E. George. I was the deputy director for operations (DDO) of the Central Intelligence Agency from July 1984 through December 1987 during which time I was responsible for the CIA's covert operations worldwide. I am also a former consultant to Feld Entertainment and its affiliates. I make this declaration based on my personal knowledge.

PETA 5981

K. Feld Ex.
15

Bloom
EXHIBIT NO. 6
DATE 6-10-00
REPTR VLF
L.A.D. REPORTING

A True Copy, Teste:
Norman H. Meyer, Jr., Clerk
By Carl Bl
Deputy Clerk

7. As part of my consulting work for Feld Entertainment, I was also asked to review reports from Richard Froemming and his organizations based on their surveillance of, and efforts to counter, the activities of various animal rights groups. I have discussed these reports in meetings in which Mr. Feld was present.

I swear under penalty of perjury that the foregoing is true and correct.

By: Clair E. George
Clair E. George

Dated: June 1, 1998

Subscribed and Sworn before me
this 1st day of June, 1998
Michelle Perry - Notary Public
My Commission Expires July 14, 2007
My Commission Expires: _____
Washington, DC

PETA 5983