

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
THE FUND FOR ANIMALS, ANIMAL WELFARE INSTITUTE, AND HSUS'  
MOTION FOR A PROTECTIVE ORDER**

**Civ. No. 1:07-cv-1532**

**Ex. 13**

**Excerpt of Clair George Aff.**

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(Plt) Def. 1379  
Date 3-13-01  
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 Carol Bloom  
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 1<sup>st</sup> day of June, 1998

Michelle Perry - Notary Public  
My Commission Expires July 14, 1997  
Washington, DC

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