

11 May 78

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8 UNITED STATES DISTRICT COURT
 9 CENTRAL DISTRICT OF CALIFORNIA

10 DONALD RAY WOOLBRIGHT,)
 11)
 Plaintiff,)
 12)
 v.)
 13)
 FEDERAL BUREAU OF INVESTIGATION,)
 14 CENTRAL INTELLIGENCE AGENCY,)
 15)
 Defendants.)
 16)

NO. CV 76-2448-LEW

17 AFFIDAVIT

18 STANSFIELD TURNER, being first duly sworn, does hereby depose and say:

19 1. I am the Director of Central Intelligence and the executive head of the Cen-
 20 tral Intelligence Agency (CIA). I have served in this position since 9 March 1977.
 21

22 2. Pursuant to the National Security Act of 1947, the CIA is responsible for,
 23 among other things, advising the National Security Council (NSC) in matters con-
 24 cerning such U.S. intelligence activities as relate to national security; making
 25 recommendations to the NSC for the coordination of U.S. intelligence activities;
 26 correlating, evaluating and disseminating intelligence relating to national security;
 27 and performing other functions and duties at the direction of the NSC. As Director
 28 of Central Intelligence, I am responsible under the National Security Act of 1947 for

1 set forth the duties and responsibilities of the Director of Central Intelligence and
2 the Central Intelligence Agency are submitted herewith as Attachment A to this
3 affidavit.

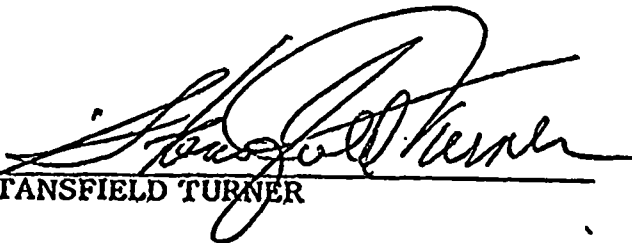
4 4. I am familiar with the contents of the complaint in the captioned
5 case. I have also been informed of the history of the captioned litigation
6 and I make the following statements based upon my personal knowledge, upon
7 facts obtained by me in my official capacity, and upon conclusions reached in
8 accordance therewith.

9 5. The Hughes Glomar Explorer (HGE) Project was specifically authorized
10 by an appropriate committee of the NSC. The Project involved the design, con-
11 struction, operation and use of a ship which came to be known as the Hughes
12 Glomar Explorer. Information concerning the background, precise purpose and
13 details of implementation of the HGE Project remains classified because public
14 disclosure of such information, in my judgment, could reasonably be expected to
15 result in damage to the national security. The Secretary of State has stated an
16 identical judgment in similar litigation. A certified true copy of Mr. Vance's
17 affidavit in the litigation Military Audit Project, et al. v. Central Intelligence
18 Agency, Civil Action No. 75-2103, United States District Court for the District of
19 Columbia is submitted herewith as Attachment B to this affidavit.

20 6. The action responsibility for the HGE Project was assigned to the CIA
21 pursuant to its statutory authority to conduct certain intelligence activities free
22 from requirements of public disclosure. At the time of the inception of the HGE
23 Project, it had been determined that all information concerning the Project which
24 would reveal its intelligence purposes including, specifically, any information
25 which would disclose United States Government involvement in the Project would
26 be classified in the interest of national security. Consequently, arrangements
27 were made by CIA with private corporations, including Summa Corporation,
28 Hughes Tool Company, and Global Marine, Inc., to provide a commercial facade

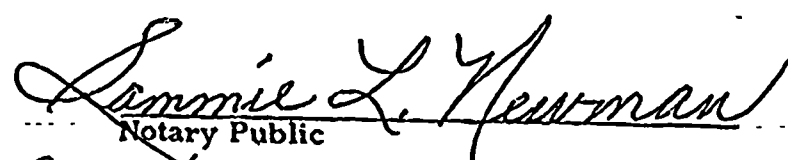
1 CIA's involvement in the HGE Project could not be disclosed for reasons of
2 national security. In the spring of 1977, after I was appointed by President
3 Carter, I caused this position to be reexamined and determined, with the con-
4 currence of Dr. Zbigniew Brzezinski, the Assistant to the President for
5 National Security Affairs, that CIA's involvement in the HGE Project could now
6 be acknowledged without incurring the risk of undue harm to the national security.

7 8. Consequently, I instructed appropriate officials of the CIA to search for
8 all documents responsive to the plaintiff's Freedom of Information request and to
9 effect the redactions required pursuant to my statutory responsibility as Director
10 of Central Intelligence to protect intelligence sources and methods and to protect
11 information which if disclosed could reasonably be expected to damage the national
12 defense and foreign relations. I have reviewed the affidavits of Ernest J. Zellmer,
13 Associate Deputy Director of the Directorate of Science and Technology, and
14 Robert W. Gambino, Director of Security, wherein the actual redactions and reasons
15 therefore are set forth with specificity and do hereby concur and ratify same.

16
17
18 
19 STANSFIELD TURNER

20 CITY OF WASHINGTON)
21) ss.
22 DISTRICT OF COLUMBIA)

23 Subscribed and sworn to before me this 11th day of May 1978.

24
25 
26 Notary Public

27 My commission expires: March 26, 1980
28