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 14 VETERANS FOR COMMON SENSE, and
 VETERANS UNITED FOR TRUTH, INC.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 VETERANS FOR COMMON SENSE, and
 19 VETERANS UNITED FOR TRUTH, INC.,

20 Plaintiffs,

21 v.

22 GORDON H. MANSFIELD, Acting Secretary of
 23 Veterans Affairs, *et al.*,

24 Defendants.

Case No. C-07-3758-SC

CLASS ACTION

**DECLARATION OF TANYA
 HARNED IN SUPPORT OF
 PLAINTIFFS' MOTION FOR A
 PRELIMINARY INJUNCTION**

Date: January 25, 2008

Time: 10:00 a.m.

Ctrl: 1, 17th Floor

Complaint Filed July 23, 2007

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1 are three publicly displayed timelines: the Veterans PTSD timeline which includes incidents of PTSD
2 related violence and two additional timelines concerning incidents relating to hurricanes Katrina and
3 Rita.

4 6. In order to build a timeline, volunteers with ePluribus Media collect information
5 (either by researching several sources or by following leads sent to the Timelines email address) on
6 the individual "incidents" that make up a timeline.

7 7. Once the information for an incident is collated, including links for the source, it is
8 entered by volunteers into the database, but not displayed. When the data entry is completed, the fact
9 checkers are alerted that there are entries to be vetted. The fact checkers verify the data. If it meets
10 journalistic standards, the fact checkers approve the incident and it is added to the displayed version
11 of the timeline. For the Veterans PTSD timeline, this verification can include review of publicly
12 available information that can be found in Lexis/Nexis and or on the internet. Volunteers seek to
13 verify that the person in the incident under review is a veteran who was deployed to either Iraq or
14 Afghanistan, and to verify as much information as possible from multiple sources regarding the
15 incident under review.

16 8. The Veterans PTSD Timeline includes 181 incidents associated with PTSD, ranging
17 from public intoxication to multiple murders. Included in that total are 54 suicides, 6 possible
18 suicides (such as drug overdoses and deaths from police fire which may have been deliberately
19 induced), and 6 incidents of veterans attempting or considering suicide. The earliest incident
20 described in the Veterans PTSD Timeline took place in June of 2002; the most recent incident that is
21 currently posted took place in July of 2007. A full print out of the Veterans PTSD Timeline is
22 attached hereto as Exhibit 1.

23 9. The Veterans PTSD Timeline does not purport to be a comprehensive database of
24 incidents such as suicide affecting veterans of Iraq and Afghanistan. At this time, we have additional
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1 leads for items that may potentially be added to the PTSD database, but which have not been
2 reviewed sufficiently to be included at this time. We also know that we have not identified or located
3 all incidents that have taken place affecting veterans of Iraq and Afghanistan which would meet our
4 criteria for inclusion.

5
6 10. While some of the situations discussed on the Veterans PTSD Timeline are identified
7 as suicides, the articles upon which the timeline relies do not always provide detailed information
8 about the death in question. However, many articles provide a perspective on the veteran's situation
9 at the time he or she committed or attempted suicide.

10
11 11. Among the stories regarding veteran suicides is the death of 22 year-old Spc. Andrew
12 Velez. According to the media reports on which the Veterans PTSD Timeline entry is based, Mr.
13 Velez died from a self-inflicted gunshot wound while serving in Afghanistan. According to reports,
14 Mr. Velez had been suffering because of the death of his brother who was killed while serving in
15 Iraq, as well as the pressure of war, and being away from his wife and children. A copy of the article
16 from The Dallas Morning News website is attached hereto as Exhibit 2.

17
18 12. Another of the stories regarding veteran suicides is the death of 22 year-old Spc.
19 Stephen Edward Colley following his return from the Middle East. According to media reports on
20 which the Veterans PTSD Timeline entry is based, Colley believed he could not get the psychological
21 help he needed from the military for fear it would jeopardize his career in the Army. A copy of the
22 article from the Santa Clarita Valley Signal website is attached hereto as Exhibit 3.

23
24 13. A third story regarding veteran suicides concerns Jonathan Schulze who hanged
25 himself at his New Prague, Minnesota, home after suffering from repetitive flashbacks, nightmares,
26 and inner turmoil. According to media reports on which the Veterans PTSD Timelines entry is based,
27 the 25 year-old had reported to a staff member of the VA that he was thinking of killing himself , but
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1 he was not admitted to the medical center that day. The following day, he was placed on a waiting
2 list. A copy of the article from the Star Tribune website is attached hereto as Exhibit 4.

3 14. Another example of veteran suicides is 23 year-old Michael Bramer. According to the
4 media reports on which the Veterans PTSD Timeline entry is based, Mr. Bramer had been suffering
5 from a severe head injury, blindness in one eye, and severe acute migraines due to an impact from an
6 unstable structure collapse outside Baghdad. A copy of the article from the Boston Globe website
7 Boston.com is attached hereto as Exhibit 5.

9 15. Among other stories regarding veteran suicides is the murder-suicide involving
10 Zachary Bowen. According to the media reports on which the Veterans PTSD Timeline entry is
11 based, Mr. Bowen had served in Kosovo and Iraq as a military policemen, earning the NATO medal
12 and the Presidential Unit Citation. Mr. Bowen apparently killed his girlfriend and then himself. A
13 copy of the article from ABC News website is attached hereto as Exhibit 6.

15 16. Another story regarding veteran suicides is the death of 28 year-old Spc. Brian
16 William Skold who was killed in a police shootout. According to them media reports on which the
17 Veterans PTSD Timeline entry is based, Mr. Skold, an Iraq veteran with a suicidal past, engaged in a
18 standoff with the police and was killed. A copy of the Associated Press report from wcco.com is
19 attached hereto as Exhibit 7.

21 17. Among these stories regarding veteran suicides is Damian Fernandez, who had been
22 diagnosed with severe PTSD and had been rated 70 percent disabled by the U.S. Department of
23 Veterans Affairs. According to the media reports on which the Veterans PTSD Timeline entry is
24 based, Mr. Fernandez was subsequently called back to duty and told to prepare for another
25 deployment to Iraq. Thereafter, he stated he wanted to die and was placed on suicide watch. He was
26 then transferred to a locked ward in a VA hospital. At the present time, the Army has no policy
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1 exempting soldiers with PTSD from returning to war. A copy of the Hartford Courant report from
2 Watchdog.org is attached hereto as Exhibit 8.

3 18. Another story involving a veteran's possible suicide is the death of Jessica Rich, 24, in
4 a head-on collision. According to the media reports on which the Veterans PTSD Timeline entry is
5 based, Ms. Rich was medically evacuated from Iraq and diagnosed with PTSD and lower-back pain.
6 A long time friend indicated that Ms. Rich could not shake memories from the war, including
7 witnessing the suicide of a fellow soldier in Iraq. She complained of nightmares, anxiety, flashbacks,
8 and difficulty in getting medical help. A copy of the report from the Denver Post website is attached
9 hereto as Exhibit 9.

10 19. Another example of a story regarding veteran suicides is the attempted suicide of
11 Matthew Vargas. According to the media reports on which the Veterans PTSD Timeline entry is
12 based, Iraq war veteran Vargas attempted suicide by hanging himself in his garage. He had described
13 himself as a killer machine. A copy of the report from CNN.com is attached hereto as Exhibit 10.

14 20. Another example of a story regarding veteran suicides is the potential suicide of Spc.
15 Robert Hornbeck. According to the media reports on which the Veterans PTSD Timeline entry is
16 based, the 23 year-old Mr. Hornbeck's body was found in an industrial-sized air conditioner after he
17 was declared missing for 12 days. A copy of the Associated Press report from MSNBC.com is
18 attached hereto as Exhibit 11.

19 21. Among the stories regarding veteran suicides is the attempted suicide of a 24 year- old
20 former Marine and Iraq War veteran. According to media reports on which the Veterans PTSD
21 Timelines entry is based, the soldier (whose name was not released in the linked article) used a knife
22 to slash his forearms as a number of friends and relatives tried to stop him.. A copy of the article
23 from the Riverside Brookfield Landmark website is attached hereto as Exhibit 12.

1 22. Another example of a story regarding veteran suicides was Cpl. Eric Ryan Grossman's
2 death on an interstate highway. According to media reports on which the Veterans PTSD Timelines
3 entry is based, the Camp Pendleton Marine opened the door of the car he was riding in, jumped out,
4 and ran into the middle of the roadway where he was killed. A copy of the article from PE.com is
5 attached hereto as Exhibit 13.
6

7 23. Another example of a story regarding veteran suicide was 34 year-old Tina Sundem
8 who attempted suicide 10 days before her tour in Iraq was to end. According to the media reports on
9 which the Veterans PTSD Timeline entry is based, Ms. Sundem received 3 days notice before
10 receiving orders to leave for Iraq. She worked as a nurse on 14-16 hour shifts in the ICU. She
11 reported that one doctor told her she was the worst case of PTSD he had ever seen. A copy of the
12 article from the News Tribune website is attached hereto as Exhibit 14.
13

14 24. Another example of a story regarding veteran suicide is Greg Braun who shot himself
15 in the head with his police gun in his home. According to media reports on which the Veterans
16 PTSD Timeline entry is based, Mr. Braun served his country in combat, first in Kosovo and then in
17 Iraq as an elite Army Ranger. A copy of the article from the Journal Sentinel website is attached
18 hereto as Exhibit 15.
19

20 25. Another of the stories regarding veteran suicides is the death of Douglas Barber, a
21 truck driver in Iraq, from a self-inflicted gunshot wound. According to the media reports on which
22 the Veterans PTSD Timeline entry is based, Mr. Barber wrote a year before his death, "All is not
23 okay or right for those of us who return home alive and supposedly well. Some soldiers come home
24 missing limbs and other parts of their bodies. Some from horrific events that no one other than those
25 who served will ever understand." A copy of the article from The Huffington Post website is
26 attached hereto as Exhibit 16.
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1 26. Another example of veteran suicide is 40 year-old former Marine sergeant, Jeffrey
2 Lehner. According to the media reports on which the Veterans PTSD Timeline entry is based, Mr.
3 Lehner had served tours in Afghanistan, Pakistan, and the Middle East, and suffered from anxiety, a
4 sense of helplessness, deeply frightening thoughts, and feelings of “survivor’s guilt.” A copy of the
5 article from informationclearinghouse.info is attached hereto as Exhibit 17.
6

7 27. Another story regarding veteran suicides is 20 year-old Chris Forcum. According to
8 media reports on which the Veterans PTSD Timelines entry is based, Mr. Forcum killed himself 6
9 weeks after returning home from Iraq. After Mr. Forcum’s unit was discharged, the soldiers had less
10 than a 24 hour debriefing before returning back into society. A copy of the article from ktvl.com is
11 attached hereto as Exhibit 18.
12

13 28. Another example of veteran suicides is Pfc. Stephen S. Sherwood who killed his wife
14 and then himself. According to media reports on which the Veterans PTSD Timelines entry is based,
15 he had enlisted in the Army in January 2004 and had just returned from Iraq. A copy of the article
16 from The Denver Channel website is attached hereto as Exhibit 19.
17

18 29. Another example of veteran suicides is 20 year-old Saxxon Rech who was discharged
19 early from the Marines. According to the media reports on which the Veterans PTSD Timelines
20 entry is based, Mr. Rech killed his girlfriend and then turned the shotgun on himself. The article
21 reports 7 homicides and 3 suicides on Western Washington soil involving active troops or veterans of
22 Iraq. A copy of the article from the Seattle Weekly website is attached hereto as Exhibit 20.
23

24 30. Another example of veteran suicides is 23 year-old Jason Cooper who hanged himself
25 in the basement of his home. According to media reports on which the Veterans PTSD Timelines
26 entry is based, Mr. Cooper had been suffering from nightmares, night sweats, and flashbacks. Three
27 days before he died, he had called his mother, crying and disoriented, and didn’t know his name. A
28 copy of the article from The Progressive website is attached hereto as Exhibit 21.

1 31. Among other stories of veteran suicides are the deaths of 15 year Army veteran Chief
2 Warrant Officer William Howell and Sgt. 1st Class Andrew MacDaniel, a military accountant,
3 shortly after returning home from Iraq. According to media reports on which the Veteran PTSD
4 Timelines entry is based, both Mr. Howell and Mr. MacDaniel served in Iraq with the 10th Special
5 Forces Group which specialized in what the Army calls “unconventional warfare.” A copy of the
6 Associated Press article from military.com is attached hereto as Exhibit 22.
7

8 32. Another example of an attempted suicide by a veteran is Salvatore “Sam” Ross, Jr.,
9 who disappeared a day after threatening suicide. According to media reports on which the Veterans
10 PTSD Timelines entry is based, Mr. Ross, who was eventually located without serious injuries, had
11 left a suicide note. During his military service in Bagdad, he had lost his eyesight, left leg and part of
12 his hearing while defusing a bomb. A copy of the article from post-gazette.com is attached hereto as
13 Exhibit 23.
14

15 33. Among other stories regarding veteran suicides is 25 year-old Army Spec. Jeffrey
16 Henthorn, a young father and third-generation soldier. According to media reports on which the
17 Veterans PTSD Timelines entry is based, Mr. Henthorn had been sent back to Iraq for a second tour,
18 even though his superiors knew he was unstable and had threatened suicide at least twice. A copy of
19 the article from the Hartford Courant website is attached hereto as Exhibit 24.
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21 34. Among other stories regarding veteran suicides is Rev. Alan McLean, a Vietnam
22 veteran, who lost large portions of his legs in a land mine. Reverend McLean, a graduate of Sanford
23 University’s master’s program and a recipient of the Purple Heart and Bronze Star, experienced
24 ongoing waves of psychological temblors stemming from the 1967 detonation. He shot himself with a
25 45-caliber pistol 38 years later. A copy of the article from The Seattle Post-Intelligencer website is
26 attached hereto as Exhibit 25.
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1 35. Another story regarding veteran suicides is Curtis Greene, 25, who hanged himself in
2 his barracks. According to media reports on which the Veterans PTSD Timelines entry is based, Sgt.
3 Green had enlisted in 1997 and was deployed to Iraq in 2003. His wife reported that he had witnessed
4 a soldier next to him who was shot in the face and then died instantly. He indicated that the war was
5 “ugly” and “he wouldn’t wish it on his worst enemy. Despite therapy and antidepressants, he
6 committed suicide. A copy of the article from the St. Petersburg Times website is attached hereto as
7 Exhibit 26.
8

9 36. Another example of veteran suicides is Capt. Michael Pelkey, who shot himself in the
10 chest and died. Prior to his death Mr. Pelkey had been sleeping with a loaded 9 mm handgun because
11 of inexplicable anxiety he felt in the safety of home. According to media reports on which the
12 Veterans PTSD Timelines entry is based, Mr. Pelkey had returned from the Persian Gulf region and
13 immediately experienced nightmares of the death and destruction he had seen in Iraq. Mrs. Pelkey
14 testified before the Senate Veterans Affairs Committee concerning the Army’s lack of counselors
15 available to treat emotional conflicts. A copy of the article from the Dallas Morning News website is
16 attached hereto as Exhibit 27.
17

18 37. Another example of an attempted veteran suicide is Pvt. Tyler Jennings who was
19 intent on killing himself, getting as far as tying a noose of rope. According to media reports on which
20 the Veterans PTSD Timelines entry is based, Mr. Jennings indicated that he suffered symptoms of
21 PTSD, but the Army began to process his discharge for “patterns of misconduct.” He indicated that
22 such categorization could purge him from the ranks and prevent him from obtaining benefits such as
23 money for college. A copy of the article from the Colorado Springs Independent website is attached
24 hereto as Exhibit 28.
25

26 38. Among the stories regarding veteran suicides is the death of 23 year-old Michael
27 Torok, who died from a single, self-inflicted stab wound to the heart. According to media reports on
28

1 which the Veterans PTSD Timelines entry is based, Mr. Torok's mother learned after her son's death
2 that while he was in Fort Bragg, he had slept 18 hours a day, experienced nightmares, lost weight,
3 and revealed personality changes. A copy of the article from the Daily Chronicle website is attached
4 hereto as Exhibit 29.

5
6 39. Another example of veteran suicides is the death of Tech Sgt. David Guindon, 48,
7 from a self-inflicted gunshot wound, one day after his arrival home from Iraq. According to media
8 reports on which the Veterans PTSD Timelines entry is based, the New England Journal of Medicine
9 reported a study of soldiers and Marine combat infantry units. It indicated that half of those who met
10 screening criteria for a mental disorder said they feared that seeking help would harm their careers.
11 A copy of the article from veteransforcommonsense.org is attached hereto as Exhibit 30.

12
13 40. Another example of veteran suicides is the death of Adam Kelley, 13 years after his
14 enlistment in the Army. According to media reports on which the Veterans PTSD Timelines entry is
15 based, Mr. Kelley had watched mortar rounds create clouds of dust which subsequently revealed
16 bodies laying on the ground, blew up bunkers, and watched Iraqi soldiers shot down in masses. A
17 copy of the article from reviewjournal.com is attached hereto as Exhibit 31.

18
19 41. Another example of veteran suicides is the suicide of Sgt. Jeffrey Sloss who shot
20 himself in the heart. According to media reports on which the Veterans PTSD Timelines entry is
21 based, Mr. Sloss' communications unit had come under mortar fire 61 times in Iraq. A copy of the
22 article from NCTimes.com is attached hereto as Exhibit 32.

23
24 42. Another of the stories regarding veteran suicides is 22 year-old Ken Dennis, who
25 hanged himself from a showerhead in his apartment. According to media reports on which the
26 Veterans PTSD Timelines entry is based, the young corporal had served in Pakistan, Afghanistan,
27 Somalia and Djibouti and had been part of the first Marine presence in Iraq. Prior to his death,
28 Mr. Dennis had written to his dad that "'it's really hard—very, very hard—to see a man's face and

1 kill him.” A copy of the article from the Seattle Post-Intelligencer website is attached hereto as
2 Exhibit 33.

3 43. Another example of veteran suicides is Lt. Brandon Ratliff, an executive officer of the
4 Army Reserve’s surgical team. Dr. Ratliff’s job included retrieving wounded soldiers from the
5 battlefield in Afghanistan. According to media reports on which the Veterans PTSD Timelines entry
6 is based, he committed suicide in his home three hours after learning that he had been denied an
7 anticipated promotion at work. A copy of the article from the Suicide Reference Library website is
8 attached hereto as Exhibit 34.

10 44. Another example of veteran suicides is the death of Army Special Forces officer, Bill
11 Howell, who threatened his wife and killed himself at his home in a sudden outburst of rage.
12 According to media reports on which the Veterans PTSD Timelines entry is based, Mr. Howell had
13 called 911 immediate prior to the incident. His wife, Laura Howell, has listened to the tape and
14 remarked, “It was very unemotional...it was ghost-like.” A copy of the article from United Press
15 International, which describes Mr. Howell’s behavior as “consistent with an extreme case of post-
16 traumatic stress disorder,” is attached hereto as Exhibit 35.

18 45. Another example of veteran suicides is the death of 28 year-old Jeremy Seeley, who
19 poisoned himself in a motel room near his base in Kentucky. According to media reports on which
20 the Veteran PTSD Timelines entry is based, Mr. Seeley had returned from Iraq and could not bring
21 himself to contact his mother at home or on the phone, leaving no telephone numbers. A copy of the
22 original article from the Guardian Unlimited website is attached hereto as Exhibit 36.

24 46. Among the stories of veteran suicides is the suicide of 43 year-old Spc. Alexis Soto-
25 Ramirez, who hanged himself in a psychiatric ward at Walter Reed Medical Center. According to
26 media reports on which the Veteran PTSD Timelines entry is based, Mr. Soto-Ramirez’s medical
27

1 records reveal that his doctor believed his mental problems were caused by the face-to-face combat in
2 Iraq. A copy of the full article from salon.com is attached hereto as Exhibit 37.

3 47. Another example of attempted suicide is Josh Sanders. According to media reports on
4 which the Veteran PTSD Timelines entry is based, Mr. Sanders made two suicide attempts while
5 under outpatient care at Ward 53 at Walter Reed Hospital. A copy of the relevant portion of the
6 article from salon.com (attached in full at Exhibit 37) is attached hereto as Exhibit 38.

7 48. Among the stories of veteran suicides is the possible suicide of Army Sgt. Thomas J.
8 Sweet II. According to media reports on which the Veteran PTSD Timelines entry is based, the 23
9 year-old soldier died in his barracks from a gunshot wound to the head. A copy of the article from
10 militarycity.com is attached hereto as Exhibit 39.

11 49. Another example of veteran suicides is 21 year-old Spc. Kyle Edward Williams, who
12 spent seven months in the Middle East as part of the 507th Maintenance Company. According to
13 media reports on which the Veterans PTSD Timelines entry is based, officials believe that Mr.
14 Williams committed suicide with one of the seven firearms he had been carrying with him on his way
15 to visit family in San Diego. A copy of the Arizona Daily Star article from fox11az.com is attached
16 hereto as Exhibit 40.

17 50. Another example of veteran suicide is 36 year-old Master Sgt. James Curtis Coons, a
18 career military man. According to media reports on which the Veterans PTSD Timelines entry is
19 based, Mr. Coons chose deployment to Kuwait after the terrorist attacks of September 11, 2001. He
20 had set up a morgue communications network and was haunted by viewing the face of a corpse.
21 After a "suicide gesture," he was evacuated from a psychiatric hospital and hanged himself several
22 days later. A copy of the article from the Washington Post website is attached hereto as Exhibit 41.

23 51. Among the stories of veteran suicides is 20 year-old Corey Small, a married man and
24 father of a 4 year old boy. According to media reports on which the Veteran PTSD Timelines entry is
25

1 based, Mr. Small was encamped in an abandoned hospital in Baghdad where he shot himself in front
2 of other troops. A copy of the original article from USATODAY.com is attached hereto as
3 Exhibit 42.

4
5 52. Among the stories of veteran suicides is the apparent suicide of 32 year-old Sgt. 1st
6 Class Rigoberto Nieves. According to media reports on which the Veteran PTSD Timelines entry is
7 based, Mr. Nieves and his wife were found shot to death at their residence in a suspected murder-
8 suicide. Nieves had been deployed to Afghanistan. A copy of the original article from CNN.com is
9 attached hereto as Exhibit 43.

10 53. A final example of veteran suicides is 23 year-old Jeffrey Lucey who hanged himself a
11 year after returning home from Iraq. According to media reports on which the Veterans PTSD
12 Timelines entry is based, Mr. Lucey had signed up for the Marines straight out of high school. In
13 2003 he was deployed to Iraq where he served for 5 months. Upon his return his parents involuntary
14 committed him to a military veteran's hospital that discharged him after a few days. Three weeks
15 later, Mr. Lucey hanged himself with a hose in the cellar of his parents' home. A copy of the original
16 article from Democracy Now is attached hereto as Exhibit 44.
17

18 I declare under penalty of perjury that the foregoing is true and correct and that this
19 declaration was executed on December 6, 2007 at Columbia, MO.
20

21
22
23 /s/ Tanya Harned

24 Tanya Harned
25
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