

DECLARATION OF JUDD C. IVERSEN

I, JUDD C. IVERSEN, declare:

1. That I am an attorney duly licensed to practice law in the United States District Court for the Northern District of California and am the appointed counsel of JULIO ZAVALA in the instant matter.

2. That I am informed and believe that following the Sandinistas revolution in Nicaragua, a group of individuals who were against the revolution formed the Conservative Party of Nicaraguans in exile. That the purpose of this party is to reinstate the democratic system in Nicaragua. That the headquarters of this party is presently located in San Jose, Costa Rica.

3. That I am further informed and believe that the Government of the United States of America has been aiding and supporting the Conservative Party of Nicaraguans in exile to reinstate the democratic system in Nicaragua. That the support given by agents for the United States of America includes training, weapons, funding, and assistance in obtaining all of the above.

4. That I am informed and believe that agents of the Conservative Party of Nicaraguans in exile are presently in the United States to raise funds for their cause and their presence and purpose is both known to and aided by agents of the United States of America.

5. I am informed and believe that individuals presently

located in San Jose, Costa Rica, possess evidence which is material to the defense of this matter and without which Defendant cannot effectively prove his innocence of the charges in the instant matter.

6. I am informed and believe that the proposed deponents refuse to voluntarily attend the trial set in this matter in the United States of America and due to their residence in a foreign country are beyond the reach of the subpoena power of this Court.

7. I am further informed and believe that the testimony recorded in this deposition is necessary to establish the defense to the charges against the Defendant herein and also may be necessary to contradict testimony of agents of the United States Government who may be called by the defense to testify at trial.

8. That counsel is appointed by the Court to represent Defendant and the Defendant is without funds to pay for the costs of the depositions and travel by counsel to attend the deposition.

It is believed that the deposition is necessary in order to prevent failure of justice and to provide necessary and material evidence of Defendant's innocence which cannot be obtained from any other source.

I declare under penalty of perjury that the foregoing is true and correct, and as to those matters stated on information and belief, I believe it to be true. Executed this 4th day of June, 1984, at San Francisco, California.

JUDD C. IVERSEN