IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. JOHN R. BOLTON, Defendant.	Civil Action No. 20-cv-1580

DECLARATION OF WILLIAM R. EVANINA

I, William R. Evanina, declare under penalty of perjury that the following is true and correct:

1. I am the Director of the National Counterintelligence and Security Center and have led this organization since June 2, 2014. And, on May 6, 2020, I was confirmed by the Senate into the position. In this role, I lead Counterintelligence for the United States Government and am the principal counterintelligence and security advisor to the Director of National Intelligence. I am responsible for leading and supporting the counterintelligence and security activities of the U.S. Intelligence Community, the U.S. Government, and U.S. private sector entities at risk from intelligence collection or attack by foreign adversaries. I am also responsible for overseeing production of the President's National Counterintelligence Strategy of the United States of America. I have served in the federal government for over 30 years, and have been a member of the Senior Executive Service since 2013.

2. I chair both the National Counterintelligence Policy Board and the Allied Security and Counterintelligence Forum of senior counterintelligence and security leaders

from Australia, Canada, New Zealand, and the United Kingdom. I also serve as Chair of NATO's Counterintelligence Panel.

3. Previously, I served as the Chief of the Central Intelligence Agency's Counterespionage Group. Under my leadership, the Intelligence Community agencies identified, prevented, and neutralized espionage-related activities by foreign intelligence services. I also have 23 years of experience as a Special Agent with the Federal Bureau of Investigation (FBI). Among other positions held during my tenure with the FBI, I served as the Assistant Special Agent in Charge of the FBI's Washington Field Office, where I led the Counterintelligence and Counterterrorism Divisions. I also served on the FBI's Joint Terrorism Task Force, where I was selected as a Supervisory Special Agent and received the FBI Director's Award for Excellence.

4. This declaration is based on my personal knowledge and information provided to me in my official capacity.

5. I have reviewed several passages from what I understand is the current version of the draft manuscript authored by the former Assistant to the President for National Security Affairs, John Bolton. I have also reviewed the classified declaration submitted by Michael Ellis, Senior Director for Intelligence Programs at the National Security Council detailing why these passages are currently and properly classified.

6. Based on my background, knowledge, and experience, as well as information available to me as Director of the National Counterintelligence and Security Center, it is my judgment that the information contained in the passages I have reviewed is precisely what foreign adversaries' intelligence services seek to target and collect. The unauthorized disclosure of this information could reasonably be expected to enable

foreign threat actors to cause serious, and sometimes grave, damage to our national and economic security.

7. I have submitted a classified declaration with this declaration for *ex parte*, *in camera* review to explain the passages that I have reviewed and my reasons for determining that public disclosure of the passage can reasonably be expected to enable foreign threat actors to cause at least serious damage to the national security of the United States.. This information is being provided in a classified declaration because to disclose them on the public record would expose classified information, and, as a result, damage national security.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 17th day of June, 2020.

William R. Evanina
Director, National Counterintelligence and Security Center