

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

LAURA SENNETT,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 1:10cv01055

DECLARATION OF JOHN G. PERREN

I, John G. Perren, pursuant to 28 U.S.C. § 1746, hereby declare the following:

1. Since January 2011, I have been employed as the Deputy Assistant Director of the Criminal Investigation Division at the Federal Bureau of Investigation (FBI) Headquarters. In this capacity, I am responsible for overseeing all criminal matters investigated by the FBI nation-wide, including major crimes, violent crimes, crimes against children, drugs, gangs, and organized crime. I was also recently given responsibility for overseeing the FBI's Southwest border initiative. I typically arrive at work between 4:15 a.m.-4:30 a.m. and leave around 6:30-7 p.m., or later, each day.
2. Prior to assuming my current position, I was the Special Agent in Charge (SAC) of the Counterterrorism Division at the FBI's Washington Field Office (WFO) from February 2008 to January 2011. In that capacity, I was responsible for overseeing all counterterrorism operations in the National Capitol Region, including investigations handled by the international terrorism, domestic terrorism, and National Capitol Response branches at WFO. WFO is the second largest FBI field office in the United States.


3. I was recently advised that an individual named Laura Sennett has filed a lawsuit against the United States in connection with an investigation carried out by WFO's Joint Terrorism Task Force (JTTF) into crimes that were committed at the Four Seasons Hotel in Washington, DC during the time that I was SAC.
4. I was also advised that Ms. Sennett is attempting to take my deposition based on receiving documents that indicate that I approved a trash cover at her residence on an expedited basis, and that I approved a pen register on her telephone.
5. Other than being advised of these facts, I have no knowledge of information relating to Ms. Sennett. As to the investigation into crimes at the Four Seasons Hotel, all I recall is that the JTTF investigated a crime related to vandalism at the Four Seasons Hotel that caused around \$200,000 of property damage to the hotel. I do not recall any other facts about the investigation, nor do I recall who was being investigated.
6. I have no documents in my possession relating to the Four Seasons Hotel investigation or Ms. Sennett.
7. As SAC over the Counterterrorism Division, I gave countless approvals for investigative techniques each week, including, for example, approvals for pen registers, Title III warrants, national security letters, and trash covers. I generally did not communicate directly with the special agent or task force officer (TFO) who was seeking the approval. Rather, I would typically review a written memo or, in exigent circumstances, provide a verbal approval based on information relayed by a supervisor, after the technique had already been approved by at least three other layers of review: the special agent/TFO's direct supervisor; FBI counsel; and the Assistant SAC in charge of the relevant branch.
8. While I am told that a document shows that I gave final approval for a trash cover at the home of Laura Sennett, I have no recollection of doing so or of what information was

conveyed to me at the time in support of approving the trash cover.

9. While I am told that a document shows that I gave final approval for a pen register on the telephone of Laura Sennett, I have no recollection of doing so, or of what information was conveyed to me at the time in support of approving the pen register.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 4/1/2011



John G. Perren