

MC/is

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF COLUMBIA

----- X  
MRS. DAVID ORLIKOW, et al., :  
: Plaintiffs, :  
: vs. : D. D. C. Civil Action No.  
: 80-3163  
UNITED STATES OF AMERICA, :  
: Defendant :  
----- X

Culpeper, Virginia

Tuesday, May 17, 1983

Deposition of,

SIDNEY GOTTLIEB, PhD

a witness, called for examination by counsel for the plain-  
tiffs, pursuant to adjournment, taken at the Boxwood House  
Motel, Route 29, Culpeper, Virginia, beginning at 10:00 o'clock  
a.m., before Millie R. Ciolino, a Notary Public in and for the  
State of Virginia at Large, when were present on behalf of  
the respective parties:

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C O N T E N T SEXAMINATION BY COUNSEL FOR:

3	<u>WITNESS:</u>	<u>PLAINTIFFS:</u>	<u>DEFENDANT:</u>
4	SIDNEY GOTTLIEB, Ph.D.	(Mr. Turner) 245	

E X H I B I T S

9	<u>EXHIBIT NO:</u>	<u>Marked for identi-</u> <u>fication and attached</u>	<u>Received in</u> <u>Evidence</u>
10	Plaintiff's #7	248	
11	Plaintiff's #8	263	
12	Plaintiff's #9	269	
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P R O C E E D I N G S

1  
2 MR. TURNER: There are presently two matters I wish  
3 to address before we continue with the examination.

4 First, the government has yet to respond to a num-  
5 ber of requests we have made for documents and other mater-  
6 ials that relate to the subject matter of Dr. Gottlieb's  
7 testimony. At Mr. Gittinger's deposition of January 19,  
8 certain materials were requested, at Mr. Helms' deposition  
9 of March 14 additional documents and other materials were  
10 requested. Those requests were confirmed in my letter of  
11 March 17, Mr. Strickland.

12 Additional materials were requested in Mr. Rauh's  
13 letter of March 29 to Mr. Strickland. I supplied copies  
14 of those two letters to Mr. Hermes on April 8. At that  
15 time I requested that those materials be supplied before the  
16 first session of your deposition, Dr. Gottlieb, and Mr.  
17 Hermes stated that those materials would be supplied as  
18 soon as possible, which he estimated at that time to be  
19 within two weeks.

20 At the April 19 session of your deposition, Dr.  
21 Gottlieb, the government agreed to provide certain documents  
22 and review other materials requested by the plaintiff. These

1 requests were confirmed in my letter of April 21 to Mr.  
2 Strickland and Mr. Hermes which also requested certain  
3 additional materials again relating to the subject matter of  
4 your deposition.

5 In that letter I asked that the requested materials  
6 be supplied before the reconvened deposition and that any  
7 materials which were ready be supplied without waiting to  
8 complete the government's response to all outstanding  
9 requests. In a telephone conversation with Mr. Strickland  
10 on May 10, I again requested the government supply what-  
11 ever materials were ready before this reconvened deposition.

12 Because we have yet to receive any of the requested  
13 materials, and because a great many of those materials bear  
14 on your testimony, Dr. Gottlieb, we will not be able to  
15 complete your deposition today. We will attempt to move  
16 through as many of the remaining questions as possible.

17 I just wanted to that state at the outset in fair-  
18 ness to you so you would understand where we stood in the  
19 deposition.

20 The second matter is quite brief. After Mr. Helms'  
21 deposition of March 14 we were approached by the CIA lawyer  
22 representing Mr. Helms, Robert La Prade. Mr. La Prade

1 stated at that time that the government was not purchasing  
2 a copy of the Helms' deposition transcript and requested  
3 that I authorize the court reporter to release the original  
4 to him for Mr. Helms' review and verification.

5 In an effort to expedite that review and to reduce  
6 any inconvenience to Mr. Helms, I authorized that release  
7 on April 8, 1983. Although some five and a half weeks have  
8 since passed, the original transcript of Mr. Helms is yet  
9 to be returned to the reporter for filing. If that original  
10 transcript is not returned by Monday, May 23, we will move the  
11 court to a second photocopy of that transcript for filing.

12 This is the reconvened deposition of Dr. Sidney  
13 Gottlieb which was originally scheduled for a week ago. Dr.  
14 Gottlieb contacted us explaining that he had to attend a fun-  
15 eral on that date and we rescheduled for today at his request.

16 Dr. Gottlieb, you realize you are still under oath.

17 DR. GOTTLIEB: Yes, I do.

18 MR. STRICKLAND: Of the letter which you mentioned  
19 which outline the plaintiff request for information, which  
20 letters would encompass the totality of the information?  
21 There was one lengthy one.

22 MR. HERMES: April 21st, the one that I believe

1 contains the entire list of outstanding requests to that point.

2 MR. TURNER: That is correct.

3 MR. STRICKLAND: So the April 21 letter to me, I  
4 believe, will encompass everything.

5 MR. TURNER: I sent copies to both you guys and I  
6 believe that it encompasses to the best of my ability of pulling  
7 together every request that was outstanding at that time.

8 MR. STRICKLAND: And we did have a conversation on  
9 the telephone several days ago where you asked if it would be  
10 possible to have some materials before or whatever materials  
11 before the deposition was reconvened and I said if they were  
12 available I certainly would. None of these materials have  
13 been made available to the U.S. Attorney's Office by the  
14 Agency at the present time. So at the moment I don't have any.

15 I understood that their review is continuing,  
16 that they are having difficulty in locating some of the docu-  
17 ments which were relied upon during earlier depositions.  
18 You will recall that certain of the exhibits might have been  
19 released under the Marks FOIA request and there is some pro-  
20 blem. As I understand, there were over ten thousand documents  
21 in that case and it is also an old case and unfortunately is  
22 not in a neat stack, so that is apparently one of the matters

1 that is holding this up, Mr. Hermes.

2 MR. HERMES: Most of the stuff has been collected  
3 and compiled and it shouldn't be a major difficulty in getting  
4 this stuff to you in about a ten day period. The ARTICHOKE is  
5 the stuff, the major outstanding request we have to comply on.

6 MR. TURNER: Will that material be available by the  
7 March 27 date specified in the court order?

8 MR. STRICKLAND: March 27.

9 MR. TURNER: May 27.

10 MR. HERMES: That is the 30-day period that was set  
11 at the last conference.

12 MR. TURNER: And other materials will be available  
13 within ten days.

14 MR. HERMES: Yes, sir.

15 MR. STRICKLAND: The last matter which you raised  
16 was the original of the deposition of Ambassador Helms. As I  
17 understand, that is still being reviewed by Ambassador Helms'  
18 counsel. I don't believe there is any problem and I -- it is  
19 obviously your choice. But, I would suggest that you not move,  
20 I will see if I can't have him expedite the review and get it  
21 signed and get it returned to you.

22 MR. TURNER: Monday is still the date. But I will



1 be in communication with you.

2 Whereupon,

3 SIDNEY GOTTLIEB, PhD

4 resumed the stand and, having been previously duly sworn, was  
5 further examined and testified as follows:

6 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS

7 BY MR. TURNER:

8 Q Since the last time you were here, Dr. Gottlieb,  
9 have you discussed the subject matter or MKULTRA with anyone?

10 A I have not.

11 Q Have you read the transcript of that first session?

12 A I have.

13 Q Have you prepared corrections to the transcript  
14 of that first session?

15 A What I did was to correct each thing and put my  
16 initials and I am prepared to sign it.

17 MR. TURNER: May I examine that at the lunch hour,  
18 any changes in Dr. Gottlieb's testimony that he has made in the  
19 document?

20 THE WITNESS: There were no major changes. Typo-  
21 graphical changes, no substantive changes.

22 MR. TURNER: With that understanding, I will not

1 to look at it, if there are no substantive changes.

2 MR. STRICKLAND: Not to my knowledge. I have not  
3 even looked at it myself or -- I have not looked at Dr. Gott-  
4 lieb's changes.

5 BY MR. TURNER:

6 Q Have you read any other transcript or testimony,  
7 Dr. Gottlieb, since our last session?

8 A I have not.

9 Q Examined any other documents?

10 A I have not.

11 Q Reports, books or other papers concerning the sub-  
12 ject matter?

13 A No.

14 Q There are a few matters that were raised last time  
15 that I wish to deal with at the beginning.

16 Dr. Gottlieb, you testified, as I recall, that an  
17 Air Force colonel served as Dr. Gibbons' deputy but you could  
18 not recall his name?

19 A Yes.

20 Q Has that come to you?

21 A Yes, it has. His name is Gen. Giller.

22 Q Do you recall whether that is right?

1           A           Ed Giller, I think that is his name. Something  
2 tells me that I may be spelling it wrong. Ed Giller.

3           Q           When did he serve in that capacity?

4           A           I would guess it was in the period of -- I have to  
5 honestly say I don't know. I can give you a figure and then  
6 I am not sure. I was thinking it was in the 60's and that is  
7 the best I can come up with.

8           Q           So he came after Colonel Drum?

9           A           Yes.

10          Q           You also testified that early in its existence  
11 MKULTRA was more concerned with the defending against techniques  
12 of behavior control than with the potential of those techniques  
13 as an offensive weapons; is that accurate?

14          A           That is accurate.

15          Q           Didn't the Olson incident suggest to people at CIA  
16 that LSD did have potential as an offensive weapon?

17          A           Not really, no.

18                   MR. TURNER: Mark this as --

19                   THE WITNESS: Let me make one comment on what I said  
20 I am inferring that you mean to suggest to people in CIA that  
21 the -- that they ought to be interested in their offensive use.  
22 Clearly they were worried about its uses in offensive weapons by

1 opposition, that was the whole idea.

2 (The document referred to was marked  
3 as Plaintiff's No. 1, Gottlieb for  
4 identification, a copy of which is  
5 attached to the court copy of this  
6 deposition.)

7 BY MR. TURNER:

8 Q Dr. Gottlieb, I hand you Plaintiff's Exhibit #7 to  
9 the deposition, it consists of two related documents and I ask  
10 you to read it.

11 (Witness perusing document.)

12 Q Who is H. M. Chadwell, Doctor?

13 A I think Chadwell was head of a unit in CIA in the  
14 early 50's known as the Office of Scientific Information.

15 Q What were his functions in that capacity?

16 A I don't know that I can answer that very accurately  
17 except that OSI at that time was part of the intelligence pro-  
18 cessing and production side of the Agency for scientific infor-  
19 mation. By that I mean they were not involved in collecting  
20 information.

21 Q Is he alive?

22 A I really don't know. I guess not. He was an old  
man at the time.

Q The Lovell referred to is Stanley Lovell?

1           A        I believe that is who he is.

2           Q        Who is he?

3           A        Stanley Lovell was somebody who was active in World  
4 War II in OSS in the technical side.

5           Q        What was his connection with the Agency?

6           A        I don't think he had any formal connection. This  
7 memorandum certainly implies that contact of some kind. I would  
8 describe what relation he had with the Agency as ad hoc contact  
9 with whom they would talk every once in a while.

10          Q        Did his areas of expertise include the use of drugs  
11 and similar techniques?

12          A        I don't know that I would know all his areas of  
13 expertise. They were some of the areas he talked about or  
14 wrote about when he was in OSS.

15          Q        Is he alive?

16          A        I really don't know. In fact, I think he wrote a  
17 book about his work in OSS.

18          Q        Who is George Merck?

19          A        I think he was the President of Merck Company. He  
20 was on some advisory committee to the Camp Detrick activity.

21          Q        What is the Merck Company?

22          A        I don't know how to describe it other than it is

1 a large pharmaceutical company in Rahway, New Jersey.

2 Q What was his connection with the Agency?

3 A None as far as I know.

4 Q His connection was with the Special Operations  
5 Division of Fort Detrick?

6 A It was more with the overall Camp Detrick operation.  
7 I think that, I am not sure.

8 Q Is he alive?

9 A I don't know.

10 Q Who is the Quarles referred to in the first page,  
11 the second point?

12 A I really don't remember who he was. I never met  
13 him, I never talked to him.

14 Q Who is Mr. McMahon, the "CC" at the bottom, Doctor?

15 A Well, the only McMahon I know is a McMahon who is  
16 now Deputy Director of CIA. At that time, I don't know.  
17 Strike that. It doesn't make much sense that in -- if this was  
18 part of this memo on December '53, I don't have any idea.

19 Q That McMahon is now the Deputy Director now with  
20 the agency?

21 A I don't know. There is no real reason to think that  
22 30 years ago that McMahon was involved with this at all.

1 Q What was the "Schwab activity at Detrick" refer-  
2 red to in paragraph 2 in the first page?

3 A Referring to the Special Operations Division at  
4 Camp Detrick.

5 Q Is Schwab a man's name?

6 A Yes. I think his name is John Schwab and he was  
7 head of the Special Operations Division. He later left Detrick  
8 to go to work, for, I think, a large pharmaceutical company.

9 Q Why did Quarles and Merck consider that activity  
10 "unAmerican"?

11 A I haven't the slightest idea.

12 Q What did that activity involve?

13 A It involved covert considerations in the use of  
14 biological and chemical warfare from a defensive point of view,  
15 as far as I know.

16 Q What was CIA's involvement in that activity?

17 A We felt that -- we had a directive we needed to keep  
18 in touch with the state of that art. It was part of U.S. capa-  
19 bility to be aware of the possibilities in covert use of bio-  
20 logical and chemical weapons.

21 Q Was that MKNAOMI?

22 A I told you last time I get very confused now about

1 the cryptonyms, I really don't remember specifically what was  
2 subsumed under MKNAOMI.

3 Q Did Quarles and Merck succeed in terminating that  
4 activity?

5 A I would have to conclude the answer is no, since it  
6 continued beyond this date.

7 Q Did you play a role in deciding whether that  
8 activity should continue?

9 A Absolutely not.

10 Q Did you discuss that activity at that time with  
11 anyone who was in a position to be active in determining whether  
12 that activity would continue?

13 A Let me back up a little bit. I was not aware there  
14 was any activity by Quarles or anybody else to kill the Schwab  
15 activity, so I couldn't involve myself in that whole question.

16 Q Did Dr. Gibbons play any role in that?

17 A I don't know.

18 Q By virtue of his position, would he have been the  
19 officer who would have been involved in taking whatever actions  
20 were necessary at a high place?

21 A I really can't answer that. Whatever I said on that  
22 would be speculative. I don't know what the connections between



1 CIA and the military about those matters were.

2 Q Who was the CIA liaison to Camp Detrick in  
3 December of 1953?

4 A I am not aware of their being any official liaison  
5 for policy matters like this. I was not aware. There could  
6 have been one.

7 Q Who dealt with the activity at Camp Detrick for the  
8 CIA in December of 1953?

9 A That is what I am trying to answer accurately for  
10 you. I don't know of anybody who was officially designated by  
11 agreement by both units.

12 Q Whether official or not, Doctor?

13 A I used to go up there myself to keep up with what  
14 was happening and so did several others that worked with me.

15 Q Who else besides you?

16 A I think Dr. Lashbrook would go up there and Dr.  
17 Bortner would.

18 Q Was it when Dr. Triechler was with TSS?

19 A In the period before he came up it was the three of  
20 us and then he certainly did have some contact with them when he  
21 came in.

22 Q Did Dr. Chadwell ever discuss the offensive useful-  
ness of LSD with you?

1 A Not to my remembrance.

2 Q Did anyone?

3 A I can't remember a specific instance of that kind  
4 of discussion taking place, but I don't want to say positively  
5 that it didn't, I just can't remember a discussion with indi-  
6 viduals.

7 Q Aside from specific discussions, can you recall whe-  
8 ther the topic was discussed at all?

9 A No, I need to have you define the context in which  
10 you are asking this. I said that the entire interest in LSD  
11 had to do with possible offensive use.

12 Q By the Agency?

13 A To my remembrance, during this period that was not  
14 at the top of the discussion that I remember. I can't remember if  
15 it didn't come up at some time. It would be logical. I am  
16 saying I can't remember a specific incident or a specific con-  
17 versation or a person with whom that was talked about. It was  
18 not the main thrust of our interest in it.

19 Q In 1953?

20 A Yes. Well, it was never the main thrust of our  
21 interest.

22 Q The offensive usefulness of LSD was, however, one of

1 your interests in MKULTRA, was it not?

2 A Later on it became one but not the main thrust of our  
3 interest.

4 Q Did you take any actions further to that interest?

5 THE WITNESS: I need to discuss.

6 (Witness and counsel confer.)

7 MR. STRICKLAND: Would you repeat the question.

8 Our referring to the CIA's interest.

9 MR. TURNER: In the offensive usefulness of LSD.

10 MR. STRICKLAND: There is a potential problem with  
11 respect to foreign covert activity that might be arguable  
12 related to that question. If we can eliminate that possibility,  
13 I think Dr. Gottlieb can testify further.

14 (Witness and counsel confer.)

15 THE WITNESS: I think the most accurate way I can  
16 answer that is that I am not aware of anything we did during that  
17 period -- I have to ask you to repeat that same question.

18 (The pending question was read by the reporter.)

19 THE WITNESS: That any actions we took during the  
20 period you are talking about were all related to our concerns  
21 about its offensive use against us not our use against somebody  
22 else.

1 BY MR. TURNER:

2 Q This is the 1953 - 54 time frame?

3 A Talking about the period of the '50's?

4 Q You didn't answer my question, Doctor. You  
5 stated that everything you did related to defensive interests?

6 A I could answer it by saying, no. The question was,  
7 did we take any actions relating to an offensive use. And if  
8 you want yes or no answer to that, the answer is no.

9 Q The question was -- I will restate it so it is  
10 clear on the record. Did you take any actions during that period  
11 which related to the offensive usefulness of LSD to the CIA,  
12 not its offensive use, the offensive usefulness of LSD?

13 A The answer is no.

14 (Witness and counsel confer.)

15 Q During any time while you were at the CIA, did you  
16 take any actions relating to the offensive usefulness of LSD to  
17 the Agency?

18 MR. STRICKLAND: I would just want to interject at  
19 this point that question is very difficult to answer in that  
20 "offensive usefulness" has not been defined and you were also  
21 asking for Dr. Gottlieb to recall a time frame of 1952, to 1973,  
22 a period of 20 some years. Dr. Gottlieb is willing to answer

1 that question to the best of his ability, but it is a difficult  
2 question to answer when it is so general and so broad.

3 (Witness and counsel confer.)

4 A. The answer to the last question is yes.

5 BY MR. TURNER:

6 Q When?

7 A I can't specify the time period. It is not that  
8 precise. I would say generally it was in the 60's.

9 (Witness and counsel confer.)

10 THE WITNESS: I think you referred to, or you are  
11 certainly aware of, a report that has come up in previous testi-  
12 mony in other cases called the Gottlieb Report. And that ques-  
13 tion is taken up and discussed quite thoroughly there.

14 BY MR. TURNER:

15 Q What was the date of that report, Doctor?

16 A It was approximately '61 or '62. It was certainly  
17 brought up in both the Church hearings and the Kennedy hearings.

18 Q What was the subject matter of the report?

19 A It was a general treatment of the possible use by  
20 CIA in an offensive sense of biologically active materials in  
21 clandestine operations.

22 Q You prepared that report?

1           A       Yes.

2           Q       Who was it sent to?

3           A       It was sent to the then Deputy Director for Plans,  
4 Richard Bissel.

5                   MR. TURNER: Mr. Strickland, in the last status  
6 hearing you represented that you preferred in the future to have  
7 formal requests made for productions. Is that correct?

8                   MR. STRICKLAND: If we are contemplating material  
9 which is not already part of the record or not reasonably inclu-  
10 ded in some former request, I would say, yes. And the principal  
11 reason for that, as we explained it to the trial judge, was so  
12 that there doesn't get to be grave confusion over what exactly  
13 is at issue and over what plaintiffs need. That is why earlier  
14 I tried to clarify which ones of your letters piece together  
15 with specificity the entirety of what you wanted.

16                   Now, if this document reasonably fits within, let us  
17 say, a request for production that the plaintiffs formerly made,  
18 tell me and that is quite sufficient.

19                   MR. TURNER: It may, I would have to review the  
20 previous request. We will be requesting this document. I will  
21 put you on notice of that now.

22                   MR. STRICKLAND: I am not familiar with the docu-  
ment.

m 1

1 MR. TURNER: I am not making a representation at  
2 this point what it contains, I believe it is.

3 What I would suggest is there will, in all likeli-  
4 hood, be matters of both ilk, some are contained within  
5 previous requests and which are not.

6 I will write you a letter after the completion of  
7 this session specifying those which are contained within  
8 previous requests and we will file another request for pro-  
9 duction as to those which were not.

10 Is that acceptable?

11 MR. STRICKLAND: I think that is exactly what we  
12 were contemplating at the status hearing. I don't know, for  
13 instance, if the documents from the Canadian Government, for  
14 instance, at least we thought a new matter, so I think our  
15 understanding is barely accurate.

16 BY MR. TURNER:

17 Q What was that report based on, Dr. Gottlieb?

18 A It was based on a study that I made in the periods,  
19 '60, '61.

20 Q What did you study?

21 (Witness conferring with counsel)

22 A It was based on mostly on interviews with Operations

1 Officers on their input into what the potential use of these  
2 materials in clandestine operations might be.

3 Q Operations Officers includes CIA field people?

4 A That is what it means.

5 Q I wanted to clarify the term, sir.

6 A Yes.

7 Q Prior to the Gottlieb Report, did you take any  
8 actions further to the CIA's interest in the offensive useful-  
9 ness of LSD?

10 A Not to my remembrance.

11 Q After the Gottlieb Report, did you take any actions  
12 further to the CIA's interest in the offensive usefulness of  
13 LSD?

14 A The substance of that report was essentially  
15 negative, very negative. It included sort of an intelligence  
16 tool. It was inherently not effective and that there was a  
17 large disinclination on the part of the American intelligence  
18 officers to use it when that was probably a good thing.  
19 That is a preface.

20 My answer to your next questions gives me security  
21 problems.

22 (Witness conferring with counsel)



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1 THE WITNESS: The answer is yes.

2 BY MR. TURNER:

3 Q Coming forward in time after the Gottlieb Report,  
4 what actions did you take further to the Agency's interests  
5 in offensive usefulness of LSD?

6 MR. STRICKLAND: Could you possibly explain that  
7 question a little bit? I believe you asked what actions did  
8 you take to further CIA's interest?

9 MR. TURNER: Relating to --

10 MR. STRICKLAND: As a manager or as a researcher.

11 MR. TURNER: New steps, Mr. Strickland.

12 He answered the question "yes". I am asking what  
13 steps he took.

14 THE WITNESS: We have a security problem.

15 MR. STRICKLAND: So your question is, what steps  
16 did he take?

17 MR. TURNER: Yes.

18 MR. STRICKLAND: There would be, as Dr. Gottlieb  
19 indicated, a security problem because it was directly a  
20 foreign covert intelligence operation.

21 MR. TURNER: Current operations.

22 MR. STRICKLAND: I wouldn't be prepared to say yes

m3-a

1 or no.

2 MR. TURNER: You are directing him not to answer?

3 MR. STRICKLAND: The Government is asserting a  
4 privilege based on the statutes and the Executive Order and  
5 we are directing him not to answer that question.

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1 Colonel Edwards wrote and it stands on its own.

2 BY MR. TURNER:

3 Q After Dr. Olson's death, did you have occasion to  
4 discuss MKULTRA with Mr. Helms, Dr. Gottlieb?

5 A I can't remember that.

6 Q Did Mr. Helms tell you anything about the protection  
7 of subjects in future experiments after Dr. Olson's death?

8 A I don't have a memory of that.

9 Q Have you ever observed an individual experiencing  
10 an adverse reaction of any kind while under the influence of  
11 LSD?

12 MR. STRICKLAND: Would you define "adverse  
13 reaction" for the witness. You may be familiar with the  
14 medical literature on research and LSD. It has particular  
15 distress effects. Adverse effects can sometimes be in the  
16 eyes of the beholder.

17 Can you help the witness with what you mean by  
18 "adverse effects"?

19 In other words, the literature will reveal that  
20 most people experience hallucinations.

21 Is that an adverse effect?

22 MR. TURNER: I will rephrase the question.

1 BY MR. TURNER:

2 Q Have you ever observed an individual experiencing  
3 distress while under the influence of LSD?

4 A I think my general answer to that would be yes,  
5 but I couldn't pin that down to a specific person or time.

6 Q Please relate what you can remember?

7 A That is what I say, I am having trouble with specific  
8 incidents.

9 Q Generally, Doctor?

10 A Well, what is in my mind now is a person experiences  
11 a set of discomforting bodily reactions such as tremors and  
12 shimmering and sort of what I call, for want of a better term,  
13 a certain restiveness and antsiness and all sorts of feelings  
14 that are not pleasant.

15 Q On how many occasions did you observe such a reac-  
16 tion on the part of an individual under the influence of LSD?

17 A I couldn't answer that with any accuracy. In the  
18 order or magnitude of two or three times.

19 Q Is that during the '50's?

20 A Yes.

21 Q Aside from the two or three instances referred to  
22 and aside from the Olson incident, have you ever observed an

1 individual experiencing any difficult after the immediate  
2 effects of receiving LSD had worn off?

3 A Could you say that, again, please?

4 MR. TURNER: Read back the question.

5 (The pending question was read by the reporter.)

6 (Witness conferring with counsel)

7 BY MR. TURNER:

8 Q As to those two or three incidents you referred  
9 to during the '50's, did you observe any difficulty after the  
10 immediate effects of the LSD had worn off in those instances?

11 A No.

12 Q So the Olson incident is the only one in which you  
13 observed someone experiencing difficulty after the effects  
14 of LSD?

15 A As long as my recollection now goes, that is true.

16 MR. STRICKLAND: We would object on the basis that  
17 that question presupposed that Olson experienced difficulties  
18 from the LSD sometime --

19 MR. TURNER: No, it didn't. All I said, he  
20 experienced difficulties after. I phrased the question  
21 quite carefully.

22 MR. LICHTMAN: It has been answered anyway.

1 BY MR. TURNER:

2 Q The last time you testified that you heard sometime  
3 in the late '50's about Mr. Blauer's death.

4 After hearing of that death, did you take any steps  
5 to protect the health and well being of experimental subjects  
6 in MKULTRA?

7 A Not to my recollection. I assume you mean as a  
8 result of that information?

9 Q Yes, sir.

10 Setting aside Mr. Blauer and the Olson incident,  
11 did you ever hear of any other death or injury to a person  
12 who had received LSD or any other hallucinogen as an experi-  
13 mental subject?

14 A That is a very broad question. I guess it includes  
15 did I read about anything?

16 Q Yes, sir.

17 A The best I can answer that is that I have some  
18 vague memory, traces of some information way back, but I  
19 couldn't pin it down. So my answer has to be I might have.

20 Q Would this have been in the '50's?

21 A I think so.

22 Q Again, setting aside Olson and Blauer, did you ever

1 BY MR. TURNER:

2 Q You have read this?

3 A Yes.

4 Q Did you supply the drug requested in this letter,  
5 memorandum?

6 (Witness conferring with counsel)

7 THE WITNESS: Well, one little problem we are having,  
8 I think I explained to you last time, the ARTICHOKE team was  
9 not in the clandestine services, it was an Office of Security  
10 mechanism at the time.

11 Relating to your question before about supplying  
12 clandestine services, there is a non sequitur there, if  
13 that is why you are showing us this.

14 BY MR. TURNER:

15 Q I call your attention to the first sentence of the  
16 document which says, "The ARTICHOKE Team, at the request of  
17 one of the Agency divisions, is going to (blank)."

18 My inference, correct me if I am wrong, when there  
19 is an excision, there is generally an overseas division and  
20 if it is an Agency division, it is usually an euphemism of  
21 clandestine services.

22 MR. STRICKLAND: That would be an incorrect

1 assumption. The deletions on these documents could be made  
2 for any number of reasons, they could be, to observe a par-  
3 ticular agency component (2) to represent non-acknowledged  
4 domestic CIA locations (3) to designate overseas locations  
5 (4) agency names or (5) cryptonyms representing any of the  
6 above four items.

7 BY MR. TURNER:

8 Q There is a question on the table.

9 (Witness and counsel confer)

10 A I just don't remember whether this was filled or  
11 not. If that was your question.

12 Q That was the question pending.

13 Did you supply LSD to other components of the CIA?

14 A Other components of the CIA.

15 (Witness and counsel confer)

16 THE WITNESS: I have been directed not to answer  
17 that.

18 MR. TURNER: Would you read back the question?

19 (Record read)

20 MR. STRICKLAND: There will be a security objection  
21 to this question, other than what is already on the record  
22 that OTS was involved in LSD experiments and, of course, the



1 ARTICHOKE/BLUEBIRD Project may have been involved which was  
2 part of the Office of Security. Other than those two there  
3 will be an objection.

4 BY MR. TURNER:

5 Q Did you supply LSD to the Office of Security?

6 A As I say, I just don't --

7 Q Not in this particular instance, Doctor, generally.

8 A I just don't remember that. I will even be more  
9 precise. I don't remember of any instance that TSD supplied  
10 the Office of Security with LSD.

11 Q Did you supply the Office of Security with other  
12 drugs?

13 A Not to my remembrance.

14 Q During the period from 1951 to 1957, did the Chemical  
15 Branch of TSS conduct research to meet the operation needs of  
16 the CIA vis-a-vis LSD and other drugs?

17 A Yes.

18 Q Were you personally involved in those research  
19 activities?

20 A Yes.

21 Q Those activities included MKULTRA?

22 A Yes.

1 Q During the period from 1951 to 1957, did the  
2 Chemical Branch conduct field experiments with LSD and other  
3 drugs?

4 A I think I have been directed not to answer that.

5 MR. STRICKLAND: Could you define "field experiments"  
6 for the witness?

7 (Witness and counsel confer)

8 MR. TURNER: Mark that.

9 (The document referred to was  
10 marked as Plaintiff's No. 10,  
11 Gottlieb for identification, a  
12 copy of which is attached to  
13 the court copy of this deposition.)

12 (Witness and counsel confer)

13 BY MR. TURNER:

14 Q I direct your attention to Plaintiff's Exhibit 10  
15 of this deposition, field experimentation is referenced in  
16 Paragraph 2(a) of the notes on ARTICHOKE Conferences which  
17 you attended on 21 February 1952.

18 (Witness perusing document)

19 BY MR. TURNER:

20 Q I repeat my question.

21 Did the Chemical Branch conduct field experiments  
22 with LSD and other drugs?

1           A     As far as this memo is concerned, and its relation-  
2           ship to what you asked, I don't feel it is relevant. During  
3           this period, as I remember, all sorts of things were talked  
4           about and many or most not acted upon. So, the memo doesn't  
5           help me.

6           MR. STRICKLAND: Just to clarify the record,  
7           field experiments, I suppose, could include anything from safe  
8           houses in New York --

9           THE WITNESS: Anything outside of Washington, D. C.

10          MR. STRICKLAND: -- to covert operational use in some  
11          country "X".

12          Does your question include the full spectrum of  
13          possibilities?

14          MR. TURNER: Let's take it in pieces.

15          BY MR. TURNER:

16          Q     As to the first part, domestic field experimentation,  
17          did the Chemical Branch conduct field experiments with LSD  
18          and other drugs?

19          A     If by what you mean "field experimentations,"  
20          experimentation outside of Washington, the answer is yes.

21          Q     I will ask the same question with respect to  
22          activities outside the United States.



1 interpreted in six or seven different ways: in the field of  
2 LSD, in the field of phychochemical research, in the field  
3 meaning of overseas area that CIA operates; it is a very  
4 ambiguous paragraph.

5 Q Dr. Gottlieb, were you personally involved in  
6 field experimentation with LSD?

7 A Again, I am troubled with the difference between  
8 this question and the last one.

9 Are you differentiating between training of  
10 personnel for field experimentation or something else?

11 Q Did you personally conduct field experiments with  
12 LSD?

13 MR. STRICKLAND: Is this question different from the  
14 one we had a few moments ago in which we had a problem with  
15 the term "field experimentation" and I believe you broke it up  
16 into domestic and overseas.

17 MR. TURNER: I am asking about Dr. Gottlieb's  
18 personal involvement. I will break it up into domestic and  
19 overseas.

20 BY MR. TURNER:

21 Q As to domestic field experimentation, were you  
22 personally involved?

1           A     If by what you mean "field experimentations", is  
2 experiments that involve -- that are taking place outside of  
3 Washington, D. C., and if by my personal involvement, you  
4 mean, was I aware of them or did I have something to do with  
5 their instigation, the answer is yes.

6           Q     As to the training of personnel in the domestic  
7 United States for the conduct of field experimentation, were  
8 you personally involved?

9           A     I really couldn't answer that. I don't remember  
10 training people for any activity like that during that  
11 period.

12                     The answer to your general question before that,  
13 I tried to be precise and say yes, but I don't remember  
14 training people during that period.

15           MR. TURNER: Let's take a five-minute break at  
16 this point.

17                     (Brief recess)

18  
19 end mfm

20

21

22

MO's  
take 3  
Dep. of  
Gottlieb

1 BY MR. TURNER:

2 Q During the period from '51 to '57, did the Chemical  
3 Branch of TSS conduct or assist in interrogations?

4 A Not to my remembrance.

5 (Witness and counsel confer.)

6 THE WITNESS: I am assuming that you mean by inter-  
7 rogations that can be looked at in a general way and, of course,  
8 the answer would be yes, when people ask other people things,  
9 I think you are implying to operationally oriented or related  
10 interrogations overseas.

11 BY MR. TURNER:

12 Q Or in the United States?

13 A Not to my remembrance.

14 MR. TURNER: Mark that.

15 (The document referred to was  
16 marked as Plaintiff's No. 12,  
17 Gottlieb for identification, a  
copy of which is attached to the  
court copy of this deposition.)

18 (Witness and counsel perusing document.)

19 (Witness and counsel confer.)

20 THE WITNESS: This is an amazing document to me  
21 because it seems to imply I was interrogated and held in a cell-  
22 like room and I certainly have no remembrance of that kind of

1 experience.

2 BY MR. TURNER:

3 Q Dr. Gottlieb, it says, "The (blank) and (blank)  
4 were informed today by Dr. Sydney Gottlieb of TSS that when he  
5 interrogated (blank) in (blank)" that certainly does not read  
6 that you were interrogated by anyone?

7 A Then I was reading it wrong. I was putting a "was"  
8 in there.

9 (Witness and counsel confer.)

10 BY MR. TURNER:

11 Q Dr. Gottlieb, were you personally involved in  
12 interrogations and the conduct of them?

13 MR. STRICKLAND: I think the document speaks for  
14 itself. Doctor, do you remember doing that?

15 THE WITNESS: Well, I am having a lot of trouble with  
16 the words "interrogation." I mean, in the first place, I  
17 honestly didn't remember the details of this, I just don't. As  
18 I read this, I am having another -- now it seems to me it says  
19 I interrogated somebody and it sounds to me I interrogated some  
20 people that had something to do with an operational interro-  
21 gation. I am quite confused at this point. As I say, I don't  
22 have a clear remembrance of this incident but to the extent



1 that it indicates that I, myself, was involved in interroga-  
2 tions of an operational kind, I -- the whole thing confuses me.  
3 In other words, what I am reading this to mean is that somehow  
4 I reported some conditions around an interrogation to some-  
5 body else and this person is saying he is going to look into it.

6 BY MR. TURNER:

7 Q I understand that. My question was, were you  
8 personally involved during the period from 1951 to 1957 in con-  
9 ducting any interrogations?

10 A This is without respect to LSD?

11 Q Without respect to LSD generally.

12 (Witness and counsel confer.)

13 THE WITNESS: The answer is yes.

14 BY MR. TURNER:

15 Q How many such interrogations did you conduct or  
16 assist in during the 1951 to 1957 period?

17 A I don't remember the answer to that question.

18 Q Can you give us an estimate?

19 A It was between one and five.

20 Q Were these all overseas?

21 MR. STRICKLAND: Objection.  
22

s-4

1 BY MR. TURNER:

2 Q Were any of these domestic?

3 MR. STRICKLAND: The same objection.

4 MR. TURNER: You are directing the witness not  
5 to answer?

6 MR. STRICKLAND: The objection was based on the  
7 statute protection of source and methods and the Executive  
8 Order on classification. As such we would be required to  
9 direct the witness not to answer.

10 MR. TURNER: You realize you have asserted that  
11 objection as to domestic interrogation?

12 THE WITNESS: Let me say something.

13 (Witness and counsel confer.)

14 MR. STRICKLAND: Yes on two bases. There are covert  
15 operational interrogations conducted in the United States in  
16 certain circumstances. In addition, the context of that ques-  
17 tion and the preceding question would almost with certainty  
18 end up revealing whether there had been foreign covert activity.

19 BY MR. TURNER:

20 Q During the period from '51 to '57, did the Chemical  
21 Branch use LSD or other drugs in interrogations or supply drugs  
22 to other components of the CIA for use in interrogations?

is-5

(Witness and counsel confer.)

1  
2 MR. STRICKLAND: Would you read the question  
3 back?

(The reporter read the pending question.)

4  
5 MR. STRICKLAND: Am I correct that the previous ques-  
6 tion asked Dr. Gottlieb was whether Chemical Branch had supplied  
7 LSD or other drugs to other components within the Agency?

8 MR. TURNER: Yes.

9 MR. STRICKLAND: Is this, the second half of this  
10 question the same question?

11 MR. TURNER: No. It goes to interrogation.

12 MR. STRICKLAND: The first question is during '51  
13 and '57 did the Chemical Branch use LSD or other drugs in  
14 interrogation -- that is the first part of the question of the  
15 component question.

16 MR. TURNER: We will sever it.

17 BY MR. TURNER:

18 Q During the '51 to '57 period, did the Chemical Branch  
19 of TSS use LSD or other drugs in interrogations?

(Witness and counsel confer.)

21 MR. STRICKLAND: Objection.

22 MR. TURNER: State the basis and direct the witness  
if you are going to direct him, please.

1 MR. STRICKLAND: Security. I will direct the wit-  
2 ness not to answer that question. As I explained earlier,  
3 the question is asked in a very general sense. There can be  
4 covert operational interrogations conducted within the United  
5 States. I had to make the objection because of the breadth  
6 of the question. Perhaps if you can restate it or if you  
7 have a document which explains what you mean better, I think  
8 we can be more helpful and the witness can answer the question.

9 BY MR. TURNER:

10 Q This is a 1957 Inspector General's report on inspec-  
11 tions of TSD. It was entered as Plaintiff's Exhibit 15 at the  
12 Helms' deposition. I read from page 200, the second page of the  
13 exhibit "In considering the objective, it is helpful to examine  
14 the operational problems that the program is designed to meet.  
15 One of the major problems is that of improper interrogation  
16 techniques. Many different methods are used to break down an  
17 individual's resistance in interrogation but there is also doubt  
18 about the accuracy and reliability of information obtained by  
19 classical methods of pressure, duress or torture. The use of  
20 drugs and psychochemicals in this respect is not new.

21 So called truth serums have been used sometimes  
22 successfully but more often not. The approach being taken by

1 the Chemical Division is to use psychochemicals to create within  
2 the individual a mental and emotional situation which will  
3 release him from the restraint of self control and induce him  
4 to reveal information willingly under a great manipulation."  
5 End of quote, 200.

6 On page 201, I read the following: "Some concrete  
7 results have been achieved. Six specific products have been  
8 developed and are available for operational use. Three of them,  
9 P-1, C-1 and C-9 are discrediting and disabling materials  
10 which can be administered unwittingly and permit the exercise  
11 of a measure of control over the actions of the subject. These  
12 have been used in six different operations on a total of 33 sub-  
13 jects."

14 I will again state the question, during the period  
15 from '51 to 1957, did the Chemical Branch of TSS use LSD and  
16 other drugs in interrogations? Is that still objected to? I am  
17 trying to give you an opportunity to remove a frivolous objection  
18 on the table.

19 MR. STRICKLAND: The extract from the I.G. report  
20 basically states that certain drugs have been identified and  
21 that they have certain properties. I don't believe that the  
22 extract in any way says that the CIA has actually utilized

is-8

1 those drugs.

2 THE WITNESS: I didn't hear that either.

3 MR. TURNER: "These have been used in six different  
4 operations on a total of 33 subjects."

5 THE WITNESS: It doesn't say anything about interro-  
6 gation.

7 MR. STRICKLAND: And the use of the terms operations  
8 there is not consistent with a covert operational use of the  
9 drug. I can't state what the I.G. meant by that, but I don't  
10 believe that document says they were used in covert interrogations.

11 (Witness and counsel confer.)

12 MR. STRICKLAND: Dr. Gottlieb mentioned, for clar-  
13 ification, and perhaps it is not accurate but what he could have  
14 been referring to might have been the safe house use. The date  
15 may be off, I don't know. But the use of the term "operational"  
16 there does not go with covert foreign operational activities  
17 and it doesn't at all speak of interrogations.

18 I suppose at this point I would also like to add  
19 that Dr. Gottlieb is both willing to sit here and answer the  
20 questions to the best of his ability. It is very difficult when  
21 questions are asked: Did TSS ever do something. If I were in  
22 his position I would have grave difficulty answering that

1 question simply from time passage and faulty memory. I would  
2 respectfully ask if we are going to inquire into a given area  
3 and there are documents that have been produced, that he be  
4 given a chance to look at them and then testify to any matter  
5 you feel appropriate.

6 I think that way will certainly speed up the pro-  
7 cedure and we will probably end up with a more accurate and  
8 more complete answers.

9 MR. TURNER: I take it you are still objecting on  
10 security grounds to the question of whether the Chemical Branch  
11 of TSS used LSD or other drugs in interrogations.

12 MR. STRICKLAND: To the extent that includes covert  
13 operational use in their domestic or overseas, yes.

14 BY MR. TURNER:

15 Q Dr. Gottlieb, did MKULTRA involve research intended  
16 to develop techniques of interrogation?

17 A To the best of my remembrance, MKULTRA initiated,  
18 supported and carried out research to shed light to provide  
19 information about interrogations. The reasons I am wording  
20 this carefully has to do with this offensive and defensive.  
21 We were certainly interested in what could be done with LSD  
22 in interrogation. Is that responsive to your question?

1 Q Did MKULTRA fund research to try to develop tech-  
2 niques of interrogation?

3 A I have trouble with the phrasing "develop techniques  
4 of interrogation." It examined techniques of interrogation. I  
5 am trying to go through my mind and think of a project we funded  
6 or developed or where we asked somebody, please develop some new  
7 methods of interrogation for us, we need to interrogate people  
8 so please do this. That was not a task, that was not the set  
9 of the experimental work that was set up.

10 I want to make clear, I am not talking about ARTI-  
11 CHOKE now. That is what ARTICHOKE was all about.

12 Q What was your involvement with ARTICHOKE?

13 A I had a very peripheral involvement with ARTICHOKE.  
14 As far as I remember, ARTICHOKE went out of existence some time  
15 in '53 and '54.

16 MR. STRICKLAND: There are several documents that  
17 the government produced which, if my memory is not faulty, set  
18 forth with specificity the purposes of MKULTRA. I think  
19 Dr. Gottlieb is having --

20 THE WITNESS: You showed me one last time.

21 MR. STRICKLAND: I think Dr. Gottlieb was having  
22 trouble with some of the rephrasing. I am not sure if it is



1 100 percent accurate or not. But I think the documents  
2 that we provided set forth with specificity the exact purposes.

3 THE WITNESS: The main point I was trying to make,  
4 we certainly were interested in the possibility of LSD being  
5 used in interrogations. What I am trying not to be inaccurate  
6 about is that we funded work to teach us how to interrogate  
7 people better.

8 BY MR. TURNER:

9 Q And you did that?

10 A I don't remember doing that.

11 Q CIA did not fund work?

12 A The primary objective of developing new techniques  
13 for interrogation, we were trying to get information about --  
14 how can I say this better -- I am really not trying to confabu-  
15 late the issue. I am trying to make it as clear as I know how.  
16 It has to do with the difference between something I have always  
17 objected to, namely, that this whole program wanted to create  
18 a Manchurian Candidate. The program never did that. That was  
19 a fiction, as far as I am concerned, that Mr. Marks indulged  
20 in and this question you are asking has to do with that and this  
21 is a sensitive area in my mind.

22 Q Dr. Gottlieb, three of the six products identified

1 in the '57 Inspector General's report under the code name  
2 cryptonyms, P-1, C-1, and C-9, what was P-1?

3 A P-1 was LSD. As far as I remember. History is so  
4 full of cryptonyms and cod words I could be wrong on some of  
5 them.

6 Q What was C-1?

7 A I don't remember. I really don't.

8 Q C-9?

9 A Nor C-9.

10 Q What effects --

11 A Let me see if I can help you. C-9 may have been the  
12 acronym reading marijuana, tetrahydrocannabinol.

13 Q C-1?

14 A I can't remember what C-1 is.

15 Q Were all three of those materials psychochemicals?

16 A Yes. I don't know since I can't remember what C-1  
17 is, I can't help you with that but these two that I mentioned  
18 would be considered in that class.

19 (Witness and counsel confer.)

20 BY MR. TURNER:

21 Q The '57 I.G. report referred to six operations on a  
22 total of 33 subjects. What do you know of that?

1           A           I am confused by that statement. I don't remember  
2 whether that -- let me rephrase it. If you are asking me what  
3 those six operations were or who these individuals were, I  
4 can't help you, I don't remember that. I am even having trouble  
5 relating that generically to whether the inference is about over-  
6 seas operations or about activities in this country in experimen-  
7 tal setting, that is not clear to me now based on my recollec-  
8 tions of events.

9           Q           Were you involved in any of those six operations?

10          A           I don't know. As I mentioned to Lee here, they may  
11 have referred to what went on in one of the safe houses, the one  
12 on the West Coast. That would not be incompatible with that.

13                   (Witness and counsel confer.)

14           THE WITNESS: I don't remember what the New York  
15 was, operations in that size.

16           MR. STRICKLAND: Or Deep Creek Lodge.



17           THE WITNESS: It could have been, I don't remember.

18           BY MR. TURNER:

19          Q           When did you leave TSS?

20          A           To the best of my remembrance, I effectively  
21 left it in about April to go into training.

22          Q           In 1957?



1           A           I suppose it was TSD.

2           Q           Did you participate in interviews with the I.G.  
3 representatives?

4           A           I remember that inspection and I don't remember what  
5 time of the year it was or to the degree in which I personally  
6 was involved.

7                        If that memorandum mentions the time of their inspec-  
8 tion, that might be helpful.

9           Q           The only date I have is '57.

10          A           If it was before April I would have to have been  
11 involved, if it was after April I may or may not. If it was  
12 July or August I certainly was not.

13          Q           The last time you declined to testify on security  
14 grounds concerning Plaintiff's Exhibit 3 in this deposition which  
15 contained a statement that you had been involved in a plan to place  
16 LSD in the drinking water of the speaker at a political  
17 rally. Have you discussed that security claim with the CIA  
18 lawyers?

19          A           Not any more than I did at the time that we are  
20 talking about.

21                       MR. STRICKLAND: Do you have a copy of three?

22                       THE WITNESS: I think his question was did we talk

1 about it since the last time and the answer was no.

2 (Witness and counsel perusing exhibit.)

3 MR. STRICKLAND: Is this document originated by the  
4 CIA?

5 MR. TURNER: Yes. Pursuant to my question.

6 MR. STRICKLAND: It may have been produced pursuant  
7 to the FOI request. My question is who originated it?

8 MR. TURNER: It has ARTICHOKE/BLUEBIRD and markings  
9 in the right-hand corner, if you will note.

10 MR. STRICKLAND: It looks like they are talking about  
11 the safe houses but I could be wrong.

12 THE WITNESS: I am confused. The question was, had  
13 we talked about it since the last meeting, the answer is no.

14 (Witness and counsel conferring.)

15 THE WITNESS: The article deals with several matters.

16 MR. STRICKLAND: Right. I would suggest that perhaps  
17 the best way to handle this is as follows: You have an out-  
18 standing request for classification review on all of the docu-  
19 ments, I believe, which have been marked as exhibits and that  
20 will certainly be done, it is being undertaken right now.

21 MR. HERMES: Isn't there a specific request in your  
22 latest set of interrogatories on that incident?

1 MR. TURNER: I can't remember.

2 MR. STRICKLAND: In summary, I think that is perhaps  
3 the best way to handle it. I certainly don't have authority  
4 to change any classification or withhold determinations on that  
5 document and Dr. Gottlieb has declined on advice of counsel  
6 to answer questions which would necessarily involve some of the  
7 retracted material. I think we would have to stand on that  
8 point until the declassification review is completed.

9 THE WITNESS: I need to know because I am confused.  
10 What are we being asked now.

11 BY MR. TURNER:

12 Q Will you now testify as to whether you did in fact  
13 supply a staff officer with LSD to place in the drinking water  
14 of a speaker at a political rally?

15 MR. STRICKLAND: Objection. I direct him not to  
16 answer pending a classification review.

17 BY MR. TURNER:

18 Q The last time you testified that you had used other  
19 pseudonyms besides Joseph Scheider but you were not permitted  
20 to answer as to the pseudonym Sherman R. Gifford. Have you  
21 discussed that security objection with the CIA lawyers?

22 A No, I have not.

1 Q Will you now testify as to the pseudonym Sherman R.  
2 Gifford?

3 MR. STRICKLAND: Objection. I direct the witness  
4 not to answer, the same explanation applies. The matter is  
5 undergoing security review by CIA. As soon as that is complete  
6 we will be in a position to respond.

7 BY MR. TURNER:

8 Q Dr. Gottlieb, during the 1951 to 1957 period, did  
9 the CIA attempt to find out whether there were techniques of  
10 producing retrograde amnesia?

11 A That was -- my remembrance of that area, that was  
12 one of the things that we talked about. I don't remember any  
13 specific projects or specific research we mounted in response to  
14 that question. That doesn't mean we didn't, I just don't remember  
15 that. What I am trying to say, it certainly was one of the  
16 things we were interested in. I can't relate it right now to  
17 a specific project.

18 Q Retrograde amnesia was, was it not, a matter of  
19 interest to MKULTRA?

20 A Yes, it was.

21 Q Were you personally involved in any such efforts to  
22 discover whether there were techniques?

1           A        You need to define. This has come up before. What  
2 do you mean by personally involved. Being the Administrator  
3 of the whole MKULTRA project, would that be a personal involve-  
4 ment?

5           Q        Whatever your involvement was, either administrator,  
6 researcher, supervisor or reviewer, overseer, supervisor,  
7 in any capacity whatever, were you personally involved in  
8 such efforts to discover whether there were techniques?

9           A        In the sense that I answered you the last question  
10 that we had an interest but I can't relate it specifically to a  
11 project and the answer is yes.

12          Q        What was your personal involvement?

13          A        As the administrator of MKULTRA.

14          Q        What techniques did you look at when attempting to  
15 discover whether there were techniques of producing retrograde  
16 amnesia?

17          A        As I said, I can't remember that level of detail.

18               MR. TURNER: Mark that.

19                               (The document referred to was  
20 marked for identification as  
21 Plaintiff's No. 13, Gottlieb for  
22 identification, a copy of which is  
attached to the court copy of  
this deposition.)



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BY MR. TURNER:

Q I ask you to read Exhibit 13, if you would and see if that doesn't aid your recollections?

(Witness and counsel perusing document.)

THE WITNESS: I understand what that says but it doesn't change my answer.

BY MR. TURNER:

Q I am trying to assist you.

A I understand that. How to answer, does that aid my recollection. I still don't remember being involved in discussions like this or translating what I answered in the positive before this specific action. I am reading this -- I don't know what to say. You say does this aid my recollection, the answer is no.

Q This document indicates that electroshock was one of two physical techniques which could aid in the production of retrograde amnesia. Would you please tell us what research efforts were undertaken subsequent to February 7, 1952, the date of this memorandum, that involve electroshock?

A I don't remember that.

Q Did the CIA ever use psychosurgery research projects?

(Witness and counsel confer.)

THE WITNESS: My remembrance is that they did but

1 I can't remember what it was or when it was or with whom it was.

2 BY MR. TURNER:

3 Q Was that done through TSS, TSD?

4 A As best as I can remember, yes.

5 Q Who was Wilder Penfield, Doctor?

6 A Wilder Penfield, as best I can remember, is a  
7 famed central nervous system researcher, I can't remember  
8 whether he was located on the West Coast or where, his most  
9 noted achievement is making a map of the brain in terms of what  
10 areas control what parts of the body.

11 Q You didn't know he was at McGill University?

12 A Now that you mention it, yes, there is another  
13 fellow at the West Coast that did a very similar thing and I  
14 couldn't remember which place Wilder Penfield was.

15 I want to make it clear to be accurate, that I  
16 didn't say that he was from McGill, you said that. I am saying  
17 I couldn't swear now it is from McGill.

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Take 4

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1 Q Dr. Gottlieb, during the period from '51 to '57,  
2 was the CIA interested in the possible applications of  
3 electroshock?

4 A I think so.

5 Q Did the CIA undertake any efforts further to that  
6 interest?

7 A Here, again, I have trouble remembering whether we  
8 just talked about, whether we actually funded some work that  
9 was going on in that area, I just couldn't remember that, how  
10 that was translated into the actual research program or where  
11 or when.

12 Q During the period from 1951 to 1957, was the CIA  
13 interested in prolonged drug induced sleep in its applications?

14 A My reactions to that is a little more esoteric in  
15 that I really don't remember that.

16 Q During the period from '51 to '57, was the CIA  
17 interested in the problem of brain washing?

18 A Yes.

19 Q Please tell us what you remember of that interest.

20 A I remember that the interest was stimulated by  
21 some questions that were difficult to answer by the behavior  
22 of returned Korean prisoners of war and returnees of Red

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1 China and that we asked Dr. Harold Wolff and his group to  
2 undertake a comprehensive study of this question.

3 Q When was that?

4 A I don't know exactly but it was in the period --  
5 if I had to make the best guess I could make was '54, '53,  
6 '55, sometime like that.

7 Q What else do you remember of the CIA's interest  
8 in brainwashing, Doctor?

9 A Well, do you want me to persue the details of  
10 this project I mentioned because that is direction that my  
11 memory goes. I don't remember other projects.

12 Q Fine.

13 A The Wolff Group either themselves or got the data  
14 from the military about these debriefings of Korean prisoners  
15 and they did some work in actually examining or interrogating,  
16 and I don't mean in the intelligence sense, but debriefing,  
17 the returnees from China and they came out with a report on  
18 this question.

19 As I remember it, it basically said that they felt  
20 that the techniques the Chinese and/or the Koreans used were  
21 not esoteric but didn't depend upon sophisticated techniques  
22 used in drugs and other more technical means, but they relied

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1 on the more, non-technical things like isolation and indoc-  
2 trination.

3 Q Who from CIA was involved in that Wolff project?

4 A Well, the people who were involved in the Society  
5 for the Study of Human Ecology, Colonel Monroe, certainly was,  
6 Gittinger was -- there were certainly others, I couldn't  
7 remember specifically who monitored and was assigned to that  
8 project. I had some contact with it.

9 Q Aside from the Wolff Project, can you tell us of any  
10 other activities undertaken by the CIA further to its interest  
11 in the problem of brain washing?

12 A There probably were some other activities. This  
13 one, the Cornell University Medical School was so much the  
14 focus and center, that I couldn't remember the others. There  
15 probably were others.

16 MR. TURNER: I would like to break for lunch now.

17 (Whereupon, at 12:30 p.m., the deposition in the  
18 above-entitled matter recessed, to reconvene at 1:30 p.m.,  
19 the same day.)  
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AFTERNOON SESSION

(1:30 p.m.)

BY MR. TURNER:

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4 Q When did the CIA first become involved with  
5 Drs. Wolff and Hinkle?

6 A As best I can remember, when you say CIA, I couldn't  
7 answer that because that predated my involvement with them,  
8 but it went back at least to 1952.

9 Q You say it predates your involvement; who was  
10 involved at the CIA?

11 A I think the ARTICHOKE, Morse Allen and Company  
12 had some contact with them.

13 Q What were the circumstances of the contact between  
14 the Office of Security People?

15 A I really don't know. They thought he had some  
16 expertise they could use. As a matter of fact, I am now  
17 recalling the sequence of events that started with Mr. Dulles'  
18 son being badly wounded and having part of his brain shot  
19 away during the Korean War and Dr. Wolff treated him and they  
20 got to know each other that way.

21 Q At his deposition, Mr. Gittinger remembered two  
22 cryptonyms in relation to the early Cornell work of Drs. Wolff

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1 and Hinkle, the first was OVERSHOE<sup>S</sup> what do you know about  
2 that project?

3 A I just remember that it had a ST in front of it.  
4 ST/OVERSHOE. In Agency parlance at that time, that was  
5 related to a Chinese activity. I imagine that in turn relates  
6 to an interest in Chinese handling of prisoners but more than  
7 that, I couldn't help you.

8 Q Who was Desmond Fitzgerald?

9 A He was the DDP.

10 Q In the early '50's?

11 A In the early '50's, he wasn't. He was, as far as  
12 I remember, and I didn't know him then, his background was that  
13 of operations officer. He later became chief of the Far  
14 East Division and DDP.

15 Q He succeeded Mr. Helms?

16 A I really don't remember that. I don't remember  
17 what the whole aspects of that succession were.

18 Q Did Desmond Fitzgerald play any role in ST/OVERSHOE?

19 A Again, for whatever help it is to you, he was  
20 probably the chief of the FE Division.

21 Q FE?

22 A Far East and that is when the "ST" comes in. It

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1 might have been a cryptonym for the information on brain-  
2 washing out of the Red China, in which case he would have had  
3 something to do with that. I don't remember what that  
4 entailed.

5 Q Is he alive?

6 A No, he died.

7 Q How did he die?

8 A He was playing tennis at home. He died while he was  
9 playing tennis.

10 Q The second cryptonym Mr. Gittinger recalled is  
11 QK/HILLTOP.

12 What do you know about that project?

13 A My remembrance of QK/HILLTOP is some sort of transi-  
14 tional name for the group of activities, part of which was  
15 later in MKULTRA. It came after ARTICHOKE and before MKULTRA.  
16 That is my remembrance of it.

17 Q OVERSHOE was the Office of Security and Far East  
18 Division joint project?

19 A I am not sure. As I say, the ST would make it a  
20 Far East division.

21 Q That --

22 A And ARTICHOKE, that was Office of Security.



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1 Q QK/HILLTOP, what were the purposes served by that  
2 project?

3 A I have no remembrance of that at all. As I say,  
4 it was somewhere in between ARTICHOKE and MKULTRA and exactly  
5 what parts of each is covered, I don't remember at all: It  
6 might have described the early relationship with Dr. Wolff's  
7 group.

8 Q When did you become involved with the oversight or  
9 otherwise involved with the Wolff and Hinkle projects?

10 A I couldn't remember exactly, but I think it was some  
11 time in '52. It would have been '53.

12 Q What was that involvement?

13 A Well, it was when the brainwashing study began to  
14 take shape and it was felt that in general the Office of  
15 Security was not really equipped by the background of the  
16 people in it to monitor that support of the project and TSD  
17 predecessor group was asked to look into taking it over and  
18 we finally did take over the monitoring responsibility of that  
19 work.

20 Q When did you take over the monitoring responsibility?

21 A I would say about '53.

22 Q How did you monitor that project?

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1           A     Well, I couldn't remember. Certainly, I, myself,  
2 during that period, saw a lot of Dr. Wolff, getting it  
3 organized, and I couldn't remember who the specific project  
4 monitor was in terms of the person that was very specifically  
5 assigned to it. His name -- let me think for a minute.

6           Q     Take your time.

7           A     No, I just couldn't remember. What I am mixed up  
8 about is when Gittinger came to work for me and I know that  
9 was later than that, it was in '53, and later he and his group  
10 were the principles with Dr. Wolff when it started, I couldn't  
11 remember who that was.

12          Q     The person who was responsible before Gittinger  
13 was that person located in New York or in Washington?

14          A     Well, at first, the person was a member of Chemical  
15 Branch or Chemical Division and was located in Washington and  
16 later when the Society for the Investigation of Human Ecology  
17 was organized, it might have been, but I don't remember  
18 specifically that Col. Monroe had that responsibility.

19          Q     Was Col. Monroe an employee of the Division?

20          A     In a sense he was. He was what we would call, and  
21 these terms get confusing, he was a contract agent. By that  
22 I mean he was undercover and he was -- he was not on a U.S.

1 salary payroll but had a contract arrangement with us. In  
2 fact, I couldn't even remember the administrative and fiscal  
3 aspects of that kind of arrangement. He basically worked  
4 full-time for the Chemical Branch under a project that had a  
5 name and was funded as a covert activity.

6 Q Now, the relationship with Drs. Wolff and Hinkle  
7 led to the establishment of the Society for the Investigation  
8 of Human Ecology; isn't that correct?

9 A That is correct.

10 Q What was the Society to do for the CIA?

11 A The Society was to act in a security sense as a  
12 funding mechanism so that the involvement of CIA's organiza-  
13 tional entity would not be apparent in projects that we were  
14 funding. And there were some projects that they did that we  
15 asked them to monitor for us and there were others, TSD  
16 officers' residents in Washington, would monitor and they  
17 would be generally aware of them.

18 Q Who was in on the decision to establish the  
19 Society?

20 A Well, certainly, Gittinger, and Goodenough and  
21 myself, Dr. Wolff, Dr. Hinkle, at least that number of  
22 people. And, then, of course, we had to get approval from

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1 whoever our superiors were, so that after we formulated the  
2 arrangement in the project, we had to get that approval. A  
3 little higher ground.

4 Q So you would have had to go to the Chief of TSS or  
5 TSD?

6 A Gibbons and he would have had to have forwarded it  
7 to the DDP and if the amount of money was above a certain  
8 amount, it would have to go up to the DCI Office.

9 Q When was the Society established?

10 A I think it was established in '54 or '55. I may  
11 be off by a year or so.

12 Q And the DDP during that period was Mr. Wisner?

13 A I think so. *L*

14 Q And the DCIA was Mr. Dulles?

15 A Yes, I think that is right.

16 Q What was your personal role in creating the  
17 Society, Dr. Gottlieb?

18 A I think the idea came to me from somebody else,  
19 I don't remember who, it could have been Gittinger,  
20 Goodenough, it could have been the people at Cornell and  
21 I agreed with the idea and translated it into a project that  
22 was approved and funded.

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MR. TURNER: Mark that.

(The document referred to was marked as Plaintiff's No. 14, Gottlieb for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. TURNER:

Q I ask you to read the cover memo, which is Plaintiff's Exhibit 14, and the attached description of the Society.

(Witness perusing document)

A This is confirmation about what I said about Project QK/Hilltop, page 2.

Q Directing your attention to the first page of Exhibit 14 in this deposition, that is your signature in the bottom right-hand corner?

A Yes, it is.

Q This memorandum was labled for the record.

When was such memoranda filed?

A I don't rightly remember where it was filed. I just don't remember. It was filed in one of the offices, as far as I can remember.

Q Are there any inaccuracies in the memorandum

1 appended?

2 A No, to the best, as I remember, it is in accordance  
3 with the facts as I remember them.

4 Q This document was also examined at Mr. Gittenger's  
5 deposition. At that time I believe he agreed that Dr. Wolff's  
6 and Dr. Hinkle's names and the Geschicwter Fund were  
7 incorrectly excised from this document. He made a renewed  
8 request.

9 MR. TURNER: I said that to inform Dr. Gottlieb  
10 there is no dispute as to the identity of the individuals.

11 MR. STRICKLAND: Yes. This document was probably  
12 originally sanitized in '78, '79, and since that time, these  
13 individuals have been officially acknowledged so Dr. Gottlieb  
14 is certainly free to answer any questions about those.

15 BY MR. TURNER:

16 Q There is a reference to the Geschicwter Fund for  
17 medical research, Geschicwter Fund, Geschicwter has been  
18 excised from the document, I believe there is no problem with  
19 that.

20 When was the Geschicwter Fund first contacted by  
21 the CIA?

22 A I would guess it was '53. It could have been

1 earlier.

2 Q What did that fund do?

3 A Its purposes were very similar to the same I made  
4 about the Society for the Investigation of Human Ecology.  
5 It was made as a mechanism to funnel funds for reasearch  
6 activities where CIA didn't want to acknowledge its specific  
7 identity as the grantor.

8 Q The covering memo on Exhibit 14 of this deposition  
9 states that one of the reasons for establishing Sub-Project 60  
10 was to separate physically the Society from the present human  
11 ecology program at Cornell.

12 What do you know about that?

13 A Just that at a certain point a need was perceived  
14 for a mechanism to fund projects and to keep in touch with  
15 a certain part of the scientific community that transcended  
16 both the interest and the capacity of the Cornell Project,  
17 the Cornell Project, then, had the title that was open title  
18 of the Human Ecology Study Program. That was basically the  
19 brain washing study and other studies that related to it and  
20 fed into it.

21 Q How did you know that the need was now beyond the  
22 interest and capabilities of the Cornell people at that time?

1           A     Well, I think this attached memo explains that  
2 quite well, points out that Dr. Wolff himself found his  
3 resources being stretched, his personal time, they found that  
4 not all of the things we became interested in really fit the  
5 Cornell University Medical School as a place to be -- have  
6 a foundation or a fund which would give money to other places.

7                     The general reason was that the scope of the  
8 activity became too large for the rather small group at  
9 Cornell to handle.

10           Q     Prior to the establishment of Sub-Project 60 and  
11 the separation of the Society from the Cornell Medical School  
12 campus, were projects at other places besides the Cornell  
13 Medical School funded through the Human Ecology Study Program?

14           A     I think so. I think there were a few. And I think  
15 that is when it became apparent that wasn't a good way to  
16 proceed.

17           Q     Did you have any discussions with either Dr. Hinkle  
18 or Dr. Hinsey?

19           A     Hinsey, I think, was the president or chief officer  
20 of the Cornell University Medical School. And Hinkle was  
21 Wolff's assistant.

22           Q     Did you have any conversation with either of these



1 Directors?

2 A I don't remember his being active in that role. He  
3 might have but I don't remember his being involved.

4 Q What was the role of Col. Monroe in the Society?

5 A I think that Col. Monroe was interviewed and finally  
6 hired to become its executive director.

7 Let me refer to something in this memo.

8 Q The Society made grants to researchers who had study  
9 areas of interest to the CIA; is that correct?

10 A The Society would try to keep in touch with that  
11 part of the scientific research community which were active  
12 in areas that we were interested in and try to -- usually its  
13 mode was to find somebody that was working in an area in which  
14 we were interested and encourage him to continue in that area  
15 with some funding from us.

16 Q Who decided which of those researchers should receive  
17 CIA support in the form of a society of grant?

18 A It was recommended, first, by the Society people  
19 themselves and then it went to whoever the project monitor was,  
20 whether it was Gittinger or Goodenough or whoever, and then  
21 it came to me. If I approved of it, it went upstairs.

22 Q Mr. Goodenough, was he at some point case officer for

1 the Society?

2 A He could have been.

3 Q You also indicated at the last deposition that  
4 Goodenough and Gittinger occasionally changed hats over who  
5 was in charge of the activities?

6 A That is accurate. Later on other psychologists  
7 became had of the behavioral activities branch.

8 Q Was the head of the behavioral activities branch,  
9 the individual responsible for the Society?

10 A Not necessarily. The point is there was one CIA  
11 officer responsible for the Society and that changed.

12 Q That changed?

13 A We had a project monitor for Sub-Project 60 and  
14 there was always an individual who was monitor of that project  
15 and that individual changed from time to time.

16 Q What steps did you take to ensure, if any, that the  
17 subjects of research funded through the Society would be pro-  
18 tected from avoidable injury?

19 A I think our assumption pretty consistently was that  
20 that was a responsibility of the investigator. We were  
21 dealing with a scientific researcher and on the basis of his  
22 own reputation, we went with his, whatever conditions were

1 appropriate under his research setup. We had no independent  
2 set of guidelines or property call in that area.

3 Q What steps did Mr. Gittinger take to ensure that  
4 subjects that were research funded through the Society would be  
5 protected?

6 A I am not sure he took any steps independent than  
7 the ones that I mentioned. My answer would be, I assume, that  
8 his -- what he did or didn't so is the same as what I said.

9 Q Do you know of any steps that he took?

10 A No.

11 Q What steps did Col. Monroe take?

12 A The same answer.

13 Q You don't know that he took any?

14 A No.

15 Q What steps, if any, did you take to ensure that  
16 individuals who were used as experimental subjects in research  
17 funded through the Society were informed of the nature of the  
18 experiment, its purpose and any attendant risk?

19 A I didn't take any steps aside from assuming that the  
20 investigator involved was a reputable member of the scientific  
21 community and was taking the steps that were appropriate at  
22 the time.

1 Q How did you ascertain he was taking the steps that  
2 were appropriate at the time?

3 A I don't know of any specific activities that were  
4 generated towards that end.

5 Q What steps did Mr. Gittinger take, if any, to ensure  
6 that individuals who were subjects in experiments receiving  
7 funding from the Society were informed of the nature of the  
8 experiment, its purpose and any attendant risk?

9 A I don't know.

10 Q Do you know of any he did take?

11 A He may have taken some but I don't know.

12 Q Do you know of any that he did take?

13 A No.

14 Q What steps did Colonel Monroe take, if any, to ensure  
15 that individuals who were subjects of experimental research  
16 being funded by the Society were informed of the nature of the  
17 experiment, its purpose and the attendant risks?

18 A The same answer as the one with Gittinger.

19 Q Do you know of any steps that Colonel Monroe did  
20 take?

21 A No.

22 Q What were your instructions to those gentlemen

1 regarding the information to be given subjects and experiments  
2 receiving funding from MKULTRA?

3 A I gave no instructions whatever.

4 MR. TURNER: Let's break for five minutes.

5 (Brief recess)

6 end mfm

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1 BY MR. TURNER:

2 Q Dr. Gottlieb, when was the first CIA involvement  
3 with McGill University with the Allan Memorial Institute?

4 A I don't remember that.

5 (Witness and counsel conferring.)

6 THE WITNESS: I was just asking Lee whether it  
7 would be appropriate to suggest to you, because it would cer-  
8 tainly help me, help you, show me what documents you have that  
9 covers this area because I think I can say in a summary fashion.  
10 I remember so few details about this project, if you would look  
11 through one question like that after another, it is going to  
12 bring up a whole series that I don't remember, whereas you have  
13 some papers that stimulate my memory or give me a context, I  
14 believe I can be more helpful to you.

15 MR. TURNER: I prefer to go ahead and ask questions  
16 initially and obtain your recollections before.

17 THE WITNESS: Sure, it is up to you.

18 BY MR. TURNER:

19 Q What is the first involvement at McGill University  
20 with the Allan Memorial Institute that you do recall by the CIA?

21 A The first thing I recall is hearing about the project  
22 again on that ABC documentary, totally completely escapes my

is-2

1 mind, I just remember vaguely that it existed and no details --  
2 I had no personal involvement except in a sign-off sense, never  
3 visited the place, never to my present remembrance discussed  
4 the details of the project.

5 Q When did you personally become aware of Dr.  
6 Cameron's research?

7 A I can't remember.

8 Q Why was the CIA interested in the research Dr.  
9 Cameron was performing?

10 A The CIA, specifically in TSD and Project MKULTRA,  
11 was interested in anything which bore upon the question of the  
12 major changes in human behavior.

13 Q What were your responsibilities in relation to  
14 the grant made by the Society for the Investigation of Human  
15 Ecology to Dr. Cameron?

16 A My responsibilities, as I remember them now, were to  
17 ensure that the work was relevant to the goals of Project  
18 MKULTRA and to satisfy myself that the investigator was a serious  
19 and reputable one.

20 Q You stated that MKULTRA and the Society were inter-  
21 ested in finding research on things which bore on the question  
22 of major changes in human behavior. Would you please explain  
how Dr. Cameron's research was funded by the Society within that

is-3

1 broad category?

2 A Well, as I remember it, again, most of my remem-  
3 brance comes from viewing this ABC documentary, he was interes-  
4 ted in the effects of sensory deprivation, in electric shock.  
5 I am not sure of this, but I believe in the use of psychotropic  
6 drugs or psychochemical. Each of these things bring about major  
7 behavioral change or could.

8 Q Why was the Agency interested in those techniques  
9 such as sensor deprivation, electric shock and psychotropic  
10 drugs which could cause major changes in human behavior?

11 A During that period we were trying to explain  
12 changes in behavior on the parts of returned prisoners of war,  
13 on the part of returned internees from Red China and some epi-  
14 sodes of bizarre behavior on the part of American diplomats  
15 returning from the Iron Curtain, these and possibly other  
16 areas were candidates for explaining some of these behavioral  
17 changes.

18 Q At his deposition Mr. Rhodes recalled a letter or  
19 memorandum discussing Dr. Cameron's research and the possibility  
20 of CIA interest in it, what do you know of that letter or  
21 memorandum?

22 A I don't remember it whatsoever -- I have no remem-  
brance whatsoever.



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1 Q Who evaluated the grant proposal?

2 A I don't remember that now.

3 Q On page 3 and 4 of the caption for the Society  
4 there is described a four phased procedure that Dr. Cameron  
5 proposed to refine upon receipt of funding from the  
6 Society. Did you read that?

7 A Yes.

8 Q It involves the use of particularly sensitive elec-  
9 tric shock to "<sup>depattern</sup>the pattern" individuals, the intensive  
10 repetition for 16 hours a day for six or seven days of pre-  
11 arranged verbal signals, partial sensory isolation and a period  
12 of continuous sleep to induce amnesia or depression, as phrased  
13 here.

14 Q What was your reaction at the time of this grant to  
15 that procedure which I have just summarized?

16 A I don't remember that now.

17 Q What is your reaction now?

18 A It is hard for me to answer. I am trying to read  
19 it and understand it.

20 Q Take your time.

21 A I remember what it says. You are asking me what my  
22 reaction is. My reaction, that it is an unusual piece of

1 research proposed, that I would assume that he had some psycho-  
2 therapeutic goals in mind, he mentions that somewhere along the  
3 line and that it was meant for highly disturbed people, that he  
4 felt needed some extreme treatment.

5 Q Why was the Society interested in funding research  
6 involving such a procedure?

7 A I can only speculate now. As I said several times,  
8 I don't have a remembrance of what my own thought processes were  
9 back then. He was talking about large changes in behavior and  
10 that is an area that we were interested in.

11 Q Vis-a-vis the specific procedure that is set forth  
12 in the application?

13 A As I said, we were interested at that time in trying  
14 to rationalize some behavioral changes that we didn't under-  
15 stand and to the extent that the results of this kind of a treat-  
16 ment would create behavioral changes, they were candidates that  
17 seemingly this might have happened to the people we were inter-  
18 ested in.

19 Q So you were interested in trying to determine what  
20 had happened to brainwashing victims and this research bore upon  
21 that question?

22 A I mentioned brainwashing victims in the sense of

is-8

1 people who seemed to have their very fundamental ideas in behav-  
2 ioral change come out of Korea, Red China, and some changes in  
3 behavior of diplomats that were returning from behind the Iron  
4 Curtain.

5 Q You mentioned earlier that one of the Chinese  
6 needs was isolation, what other methods?

7 A I am trying to recall the requirements of the Human  
8 Ecology Study which I think as a summary came out quite a bit  
9 after this. We are talking about something that we drew conclu-  
10 sions about later. At the time there was an interest in this  
11 sort of thing there were no conclusions.

12 Q I think your chronology may be incorrect, sir. The  
13 study, I believe you are referring to, was eventually made  
14 public in Congressional testimony before the McClellan Com-  
15 mittee which predated this application?

16 A It could be. I am speaking of some publication in  
17 the scientific literature that came out of the Cornell work that  
18 came out.

19 Q Regardless, what techniques other than sensory iso-  
20 lation or isolation were --

21 A As I say, I really don't remember the results of  
22 those with specificity.

is-9

1 Q Did they involve writing things?

2 A The reason I am hesitating, my first answer is I  
3 don't remember. But I think there was something in Wolff's work  
4 or our own perception they often had to write long confessions.  
5 That is one of the techniques.

6 Q On page 5 of the application the following appears  
7 as an objective: "Can we develop better methods of inactivating  
8 a patient during the period of driving exposure to repetition,  
9 and at the same time maintain him at a higher level of activity,  
10 by physiological and chemical agents, than by the present  
11 physiological effects? Among the chemical agents which we pro-  
12 pose to explore with respect to their capacity to produce inacti-  
13 vation are the following used either singly or in combination;  
14 artane, anectine, bulbocapnine, curare.

15 "We propose to use LSD-25 and other similar agents  
16 as a means of breaking down the ongoing patterns of behavior."

17 Do you recall having seen or knowing of the Cameron  
18 proposal to use such drugs?

19 A No, I don't remember that now.

20 Q What is artane, a-r-t-a-n-e.

21 A I don't remember.

22 Q Anectine?

1

A I don't know.

2

Q Bulbocapnine?

3

A I know it is a class of chemical substance called

4

alkaloids.

5

Q What are alkaloids?

6

A Alkaloids are nitrogenous salts that

7

occur in nature.

8

Q What is their effect on the physiology if someone

9

were to receive them?

10

A They vary. They have different physiological

11

effects. That definition refers to their chemical structure

12

more than to their physiological effects. You almost always

13

have a physiological effect.

14

Q Is paralysis an effect that some of them may have?

15

A Some of them, yes.

16

Q What is curare?

17

A It is a muscle poison. The best way I can explain

18

it, as I remember it. It can be used to paralyze muscles.

19

Q Was the CIA interested in curare?

20

A Not particularly.

21

Q What about bulbocapnine?

22

A The CIA wasn't interested in that whole range of

is-11

1 drugs except the LSD is my remembrance.

2 Q Did Mr. Gittinger discuss the Cameron application  
3 with you?

4 A I can't remember that.

5 Q Did anyone?

6 A I can't remember. I tell you one thing that would  
7 help me in answering your questions as accurately and as help-  
8 fully as I can, if you have a copy of a memo for the record for  
9 that MKULTRA subproject. If I could see that.

10 Q I hand you two documents, Exhibit 5 in the Helms'  
11 deposition and Exhibit 6 both dated February 26, 1957 and ask  
12 you to read them.

13 (Witness and counsel perusing documents.)

14 (Witness and counsel confer.)

15 BY MR. TURNER:

16 Q You approved the grant to Dr. Cameron, didn't you,  
17 Dr. Gottlieb?

18 A Yes, I was looking at this.

19 Q Is that not your signature?

20 A Yes, that is my signature.

21 Q Did the medical staff at the CIA review the Cameron  
22 grant application?

A I don't remember that.

is-12

1 Q Did they review any MKULTRA grant application?

2 A Not that I remember.

3 Q What was Robert Lashbrook's role in funding the  
4 Cameron grant?

5 A I don't remember that.

6 MR. TURNER: Mark this.

7 (The document referred to was  
8 marked for identification as  
9 Plaintiff's No. 15, Gottlieb for  
10 identification, a copy of which  
is attached to the court copy of  
this deposition.)

11 BY MR. TURNER:

12 Q Plaintiff's Exhibit 15 for this deposition, that  
13 bears Dr. Lashbrook's name?

14 A What I would imagine the date 26 June 1957 I was  
15 effectively out of the job as Chief TSD. As I said I was in  
16 training for an overseas job and chances are they had not  
17 appointed a chief formerly, he was Acting.

18 Q Who of your superiors approved the funding of the  
19 grant to Dr. Cameron?

20 A The last thing you showed me had Dr. Gibbons' signa-  
21 ture on there, as I remember it.

22 Q Which of these two documents, 5 and 6, is the actual

1 document that authorized the drawing of funds? I am trying to  
2 understand that.

3 A I really can't answer that. One goes to the Comp-  
4 troller and the other is memorandum for our own records and they  
5 basically leave the information, the substantive information out  
6 to the Comptroller, essentially the same thing with all the sub-  
7 stantive information. You know they are both signed by the  
8 same people.

9 Q So Dr. Gibbons was the only one of your superiors  
10 who approved that?

11 A Apparently.

12 Q In 1977 at the Kennedy Committee hearing you tes-  
13 tified unequivocally that each of the projects funded under  
14 MKULTRA was the subject of at least two tiers of review. Why  
15 was the Cameron grant different?

16 A I might have either been talking about a period of  
17 time or an amount of funds. If I didn't qualify it that way,  
18 maybe I should have. I can't explain that to her than to say,  
19 I am a little surprised reading this now that there isn't another  
20 level of signature, but it might be if the thing exceeded  
21 \$50,000, for instance, there would have to be another signature.

22 Q But you cannot reconcile your testimony?



1           A       Well, I might have made a mistake. I might have mis-  
2 recollected. My impression is there is still two tiers of  
3 approval.

4           Q       What did you know of Dr. Cameron's work when you  
5 approved the grant?

6           A       I can't remember that now, but I would assume it is  
7 what I heard and read from the people that worked for me. I  
8 did not have a lot or any independent knowledge of Dr. Cameron.

9           Q       Did anyone tell you that Dr. Cameron would subject  
10 mental patients to massive electric treatment which involved  
11 repeated shocks of high voltage after the initial convulsion was  
12 induced?

13                   MR. STRICKLAND: Objection to form; answer.

14                   THE WITNESS: I don't remember anybody telling me  
15 that.

16                   BY MR. TURNER:

17           Q       Did you hear anything --

18           A       Let me change that. I don't remember whether that --

19           Q       Do you remember hearing anything like that?

20           A       I just said I don't remember.

21           Q       Did any one tell you anything about that after you  
22 approved the grant?

1           A       Not that I remember.

2                    Let me draw your attention to the fact that at  
3 some period and it was shortly after this, I was not on the scene  
4 so that may explain why I didn't hear more about these things,  
5 why I can't remember pretty much anything of this project.

6           Q       Did anyone tell you that Dr. Cameron would administer  
7 LSD to mental patients and then interrogate them?

8                    MR. STRICKLAND:  Objection to form.

9                    THE WITNESS:  No.

10                   BY MR. TURNER:

11           Q       Did you hear anything about that after you approved  
12 the grant?

13           A       No, not to my remembrance.

14           Q       Did anyone tell you that Dr. Cameron would employ  
15 prolonged sensory deprivation on patients confining them to an  
16 "isolation chamber" for periods of up to 35 days?

17                    MR. STRICKLAND:  Objection.  The question is did  
18 anybody tell me that, is that your question?

19                    MR. TURNER:  Yes.

20                    THE WITNESS:  Not that I remember.

21                    BY MR. TURNER:

22           Q       Did you hear anything of that?

1           A           I heard about it when I reviewed the ABC documentary  
2 that I mentioned.

3           Q           Until that documentary you had heard nothing?

4           A           I don't remember.

5           Q           Did anyone tell you that Dr. Cameron would continue  
6 to administer drugs such as LSD and use the massive electro-  
7 shock treatments I described until the mental patients were  
8 "depattered"?

9                       MR. STRICKLAND: Objection to form.

10                      MR. LICHTMAN: I would like to understand the  
11 nature of the objection.

12                      MR. STRICKLAND: Form.

13                      MR. LICHTMAN: You can ask was he informed of that  
14 information. Was he told that?

15                      MR. STRICKLAND: Is there anything on the records  
16 which establishes that fact?

17                      MR. LICHTMAN: It doesn't matter. The question is  
18 was he told that.

19                      MR. STRICKLAND: I am not trying to argue. I am  
20 going to preserve the objection. I am going to preserve the  
21 objection.

22                      THE WITNESS: I don't remember being told that.

1 BY MR. TURNER:

2 Q Did anyone tell you that when a subject has been  
3 "depatterned" his or her mental processes are severely impaired,  
4 that the subject is terribly confused and disorganized, and that  
5 the depatterning so affects the central nervous system that the  
6 subject is often unable to even control his or her body  
7 function?

8 A I don't remember anybody telling me that.

9 Q Did you hear anything about that after you approved  
10 the grant?

11 A No, or at least I can't remember hearing that.

12 Q Did anyone tell you that Dr. Cameron would subject  
13 mental patients to psychic driving after they had been suf-  
14 ficiently depatterned?

15 MR. STRICKLAND: Objection.

16 THE WITNESS: I don't remember anybody telling me  
17 that.

18 MR. TURNER: As to that objection as to form that is  
19 included in the Cameron form application, Mr. Strickland.

20 MR. STRICKLAND: You have asked a whole series of  
21 questions which I think they presuppose facts not in evidence.  
22 I cannot conduct a review of all the records which might have been

1 introduced so far and the exhibits, so if I was incorrect in  
2 that last one I will apologize. I think the objections were  
3 preserved with a minimum of interruption to you and the witness  
4 was allowed to answer.

5 BY MR. TURNER:

6 Q Did anyone tell you that psychic driving sessions  
7 would last from 6:00 a.m. to 9:00 p.m. and would consist of the  
8 continuously repeated playing of a statement from a loop tape  
9 recorder?

10 MR. STRICKLAND: Objection.

11 THE WITNESS: I don't remember anybody telling me  
12 that.

13 BY MR. TURNER:

14 Q Did anyone tell you that those tapes would be  
15 played through speakers in the patient's pillows or through head-  
16 sets worn by the patient so they could not avoid hearing the  
17 message?

18 MR. STRICKLAND: Objection.

19 THE WITNESS: I don't remember anybody telling me  
20 that.

21 BY MR. TURNER:

22 Q Did anyone tell you that over the usual 20-day

1 pshchic driving period a patient would be forced to listen to  
2 those statements some one-quarter to one-half million times?

3 MR. STRICKLAND: Objection.

4 THE WITNESS: I don't remember anybody telling me  
5 that.

6 BY MR. TURNER:

7 Q Did anyone tell you that in some instances patients  
8 would be subjected to the psychic driving experiments which I  
9 have described for periods of up to 60 or 90 days?

10 MR. STRICKLAND: Objection.

11 THE WITNESS: I don't remember anybody telling me  
12 that.

13 BY MR. TURNER:

14 Q Did anyone tell you that to ensure they would listen  
15 to the psychic driving statements, patients would receive para-  
16 lytic injections of bees wax and curare?

17 MR. STRICKLAND: Objection.

18 THE WITNESS: I don't remember anybody telling me  
19 that.

20 BY MR. TURNER:

21 Q After you approved the grant, did you hear any of  
22 these facts about psychic driving?

1           A           I did not.

2           Q           Aside from the ABC documentary?

3           A           I don't remember hearing that.    As I mentioned to  
4 you, shortly after that I left TSD and didn't come back for  
5 about three or four years.

6           Q           Did anyone tell you that Dr. Cameron would adminis-  
7 ter a variety of drugs which would cause patients to sleep for  
8 periods of up to 40 days in an effort to induce amnesia in those  
9 patients after they had been depatterned and then subjected to  
10 psychic driving?

11                   MR. STRICKLAND:    Objection.

12                   THE WITNESS:    I don't remember being told that.

13                   BY MR. TURNER:

14           Q           Did you hear anything about that after you approved  
15 the grant?

16           A           Not that I remember.

17           Q           What is the intelligence purpose served by testing  
18 methods of inducing amnesia, Dr. Gottlieb?

19           A           In the context of our research at that time, as I  
20 said, we were interested in changes in human behavior that might  
21 shed some light on these phenomenal brainwashing, fundamental  
22 changes of attitude.

1 Q Isn't it true that the Office of Security and the  
2 intelligence people were greatly interested in finding ways to  
3 make CIA people forget secrets so if they were interrogated by  
4 foreigners their secret would be safe?

5 MR. STRICKLAND: Objection.

6 THE WITNESS: I don't remember.

7 BY MR. TURNER:

8 Q Did you personally evaluate Cameron's experimental  
9 protocols?

10 A Probably not.

11 Q Do you remember doing so?

12 A No.

13 Q Did Gittinger?

14 A I don't know.

15 Q Did anyone?

16 A I don't know.

17 Q Did you determine whether the procedures he planned  
18 to use would be likely to cause injury to the subjects?

19 A I didn't, no.

20 Q Did Gittinger?

21 A I don't know.

22 Q Did anyone else?



1 A I don't know.

2 Q Did you determine whether Cameron was going to  
3 tell patients and their families they were subjects in experi-  
4 mental procedures?

5 A Did I personally determine that, no.

6 Q Did Gittinger?

7 A I don't know.

8 Q Did anyone else?

9 A I don't know.

10 Q Did you determine whether Cameron was going to tell  
11 the patients and their families that those experiments were new  
12 and untested?

13 A I didn't know.

14 Q Did Gittinger?

15 A I don't know.

16 Q Did you instruct anyone to do that?

17 A I can't remember.

18 Q Do you remember instructing anyone to do that?

19 A No.

20 Q Did you determine whether Cameron was going to  
21 tell the patients and their families that other accepted  
22

1 therapeutic procedures were available for the treatment of men-  
2 tal illness?

3 A I didn't.

4 Q Did Mr. Gittinger?

5 A I don't know whether he did or not.

6 Q Did you instruct anyone to do that?

7 A I can't remember whether I did.

8 Q Do you recall issuing such instructions?

9 A No.

10 Q Did you determine whether or not Cameron was going  
11 to tell the patients and their families that the experimental  
12 procedures were unlikely to yield therapeutic benefits?

13 A Will you repeat that.

14 (The reporter read the pending question.)

15 THE WITNESS: No.

16 BY MR. TURNER:

17 Q Did Gittinger?

18 A I don't remember whether he did or not. I don't  
19 know whether he did or not.

20 Q Do you recall issuing instructions to anyone to do  
21 that?

22 A I don't.

1 Q Did you determine whether Cameron was going to tell  
2 the patients and their families that the experimental proced-  
3 ures would be painful and distressing?

4 A No.

5 Q Did Gittinger?

6 A Not to my knowledge.

7 Q Did you instruct anyone to do that?

8 A No.

9 Q Did you determine whether Cameron was going to tell  
10 the patients and their families that the experimental procedures  
11 includes the use of hazardous techniques that could cause  
12 psychological injury of the subjects?

13 A No.

14 Q Did Gittinger?

15 A Not to my knowledge.

16 Q Did you issue such instructions to anyone?

17 A Not to my remembrance.

18 Q Did you determine whether Cameron was going to tell  
19 the patients and their families that the experimental procedures  
20 were being funded to advance nonmedical purposes?

21 A I wasn't aware of that.

22 Q They were being funded by the CIA, were they not?

1           A           I don't read that they were supposed to yield an  
2 unmedical benefit.

3           Q           Did you determine whether Cameron was going to tell  
4 the patients and their families that he was receiving money from  
5 someone who is not interested in the medical aspects of his  
6 treatment?

7           A           That is not true. I tried to state as a preface to  
8 all of this that our mode of operation was to encourage people  
9 who were already doing research, for valid research purposes  
10 to continue them where we thought they would shed light on some  
11 questions where we were interested in and I don't -- I can't  
12 respond to that formulation of that point.

13                   MR. STRICKLAND: That is exactly the reason that we  
14 would lodge the objection to the entire series of forgoing  
15 questions. They are often characterized as whether Dr. Cameron  
16 was going to advise patients and their families, and then there  
17 is a fact given, there has been no establishment of any of those  
18 facts and that is why Dr. Gottlieb is having problems.

19                   BY MR. TURNER:

20           Q           Whether Cameron was going to tell the <sup>patients</sup> ~~parents~~ and  
21 their families that they were subject in experiments receiving  
22 money from the CIA front.

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MR. STRICKLAND: Objection.

THE WITNESS: One of these things I read said that he didn't know. Said he was unwitting. So how could we tell patients he was not witting.

BY MR. TURNER:

Q So did you know he did not as a matter of fact do that?

A I don't know. The question --

Q The answer is, you don't know?

A The question doesn't make sense to me. If Cameron didn't know he was getting money from CIA, how in the world could he have told his patient that?

1 Q Precisely.

2 Did you take any steps at all to ensure that the  
3 experimental subjects of the Cameron Research at McGill  
4 University were told a full story about those experiments?

5 A Aside from the fact they were funded by CIA, we left  
6 that entirely up to Cameron.

7 Q Did you personally take any steps to ensure that  
8 experimental subjects at McGill University were told the full  
9 story of those experiments?

10 A The best answer I can give you is that we depended  
11 upon Cameron to take all of these steps.

12 Q In other words, Dr. Cameron had complete discretion  
13 as to what he would tell the patients in the experiments which  
14 were funded by the CIA; is that correct?

15 A I am trying to process that. This was a grant of  
16 money, and, yes, the principal investigator had complete  
17 discretion about how it was used.

18 (Witness and counsel confer)

19 MR. STRICKLAND: That may not have been responsive  
20 to your question.

21 Was your last question --

22 MR. TURNER: I will restate that.

m2

1 BY MR. TURNER:

2 Q It is correct, is it not, that Cameron had complete  
3 discretion as to what he would tell the patients in the  
4 experiments that were funded by the CIA?

5 (Witness and counsel confer)

6 A That is correct.

7 Q Were the patients in fact at McGill told they were  
8 the subject of experimental procedures, Dr. Gottlieb?

9 A I don't know.

10 Q Were they in fact told those experimental procedures  
11 were new and untested?

12 A I don't know.

13 Q Were they, in fact, told that other accepted  
14 therapeutic procedures were available for the treatment of  
15 mental illness?

16 A I don't know if they were told that.

17 Q Were they, in fact, told that experimental procedures  
18 were unlikely to yield therapeutic benefits?

19 A I don't know what they were told.

20 Q Were they in fact told that experimental procedures  
21 could be painful and distressing?

22 A I don't know.

m3

1 MR. STRICKLAND: I think Dr. Gottlieb testified he  
2 had no contact, he doesn't know what he was told at all. So  
3 the question to no matter what you ask will be that he doesn't  
4 know.

5 BY MR. TURNER:

6 Q You were the man who approved the funding of these  
7 activities, weren't you?

8 A The activities took place after I left the outfit  
9 and I just don't know.

10 Q Who replaced you as chief?

11 A I don't remember that. There was a period of two  
12 or three years.

13 MR. STRICKLAND: It might have been Bortner?

14 (Witness and counsel confer)

15 BY MR. TURNER:

16 Q Why was Canada chosen for the type of research funded  
17 by the Society grant to Dr. Cameron?

18 A I don't know the answer to that. My assumption is  
19 that McGill was chosen because that was where Dr. Cameron had  
20 his research activities. I don't know any other reason why  
21 it was chosen.

22 Q Were those brainwashing experiments conducted in



m4

1 Canada because the Agency knew that conducting them in the  
2 United States was too dangerous as it would lead to tremendous  
3 public outcry if discovered?

4 MR. STRICKLAND: Objection to form.

5 THE WITNESS: I don't remember that conversation  
6 ever coming up in any form.

7 BY MR. TURNER:

8 Q What did you at CIA tell the Canadian Government  
9 about it?

10 A I didn't tell them anything.

11 Q You were using their citizens as guinea pigs. You  
12 didn't feel an obligation --

13 MR. STRICKLAND: Objection as to form. And you are  
14 badgering the witness.

15 THE WITNESS: I would like to state for the record  
16 that you are asking me a series of questions the answers to  
17 which I couldn't possibly know. As I said, I left the scene  
18 shortly after this was signed and you are asking me questions  
19 I don't know the answers to. You keep asking those questions.

20 MR. TURNER: Let's take a break.

21 (Brief recess)

22

m5

1 BY MR. TURNER:

2 Q Dr. Gottlieb, patients who are confined to a mental  
3 institution sometimes exercise judgment that isn't fair as a  
4 consequence of their mental illness; isn't that correct?

5 A I don't know of any.

6 Q Patients in a mental hospital are less likely to  
7 question what the doctor does than patients who are in full  
8 control of their faculties; isn't that correct?

9 A Anything I would say on questions like that would be  
10 sheer speculation, I don't know that for a fact.

11 Q You are the man who approved the funding of experi-  
12 ments in a mental hospital.

13 What do you know about the capabilities of patients  
14 in mental hospitals who exercise judgment as to the care or  
15 lack of it that they will accept?

16 A I don't feel I am competent to answer that kind of  
17 a question.

18 Q Do you know anything of the capacities that  
19 people who have been confined to a mental hospital --

20 A I never worked in a mental hospital, I have never  
21 treated mental patients.

22 Q What supervision over Dr. Cameron did John Gittinger

1 exercise?

2 A Didn't we deal with that question before? It seems  
3 to me you asked me that once. I don't know.

4 (Witness and counsel confer)

5 BY MR. TURNER:

6 Q Did Gittinger ask Cameron what measures would be  
7 taken to safeguard the well being of experimental subjects?

8 A I don't know.

9 Q Did you give him any instructions to do so?

10 A For the period that this work was carried out,  
11 I wasn't there so I couldn't possibly have done that.

12 Q When you approved the application --

13 A I have no remembrance of anything like that.

14 Q You didn't feel you had any obligation to do so?

15 A I don't remember whether I felt I had an obligation  
16 to do so.

17 Q Did Mr. Gittinger ask Cameron for reports on the  
18 conditions of subjects while they were undergoing experimental  
19 procedures?

20 A I wasn't present when they were undergoing the  
21 procedures.

22 Q Did you instruct Mr. Gittinger to request such

1 reports?

2 A I don't remember whether I did or not.

3 Q Do you recall doing it?

4 A I don't recall.

5 Q Have you been informed whether Mr. Gittinger asked  
6 Dr. Cameron what measures he would take to safeguard the well  
7 being of experimental subjects?

8 A Would you put that in a time frame?

9 Q Ever?

10 A As I said, I wasn't there for a period of time.

11 Q That is why I rephrased the question in this form.

12 A Pardon?

13 Q That is the --

14 A I don't remember that.

15 Q Did Mr. Gittinger ask Dr. Cameron for reports on the  
16 condition of experimental subject after they had completed that  
17 four-part procedure that was included in his application?

18 A I was not in Washington, I had nothing to do with  
19 the project at that point.

20 Q Do you know whether he did that?

21 A I have no idea.

22 Q Have you since learned whether he did that?

m8

1 A I have no information on that subject.

2 Q Did you give him any instructions?

3 A Are you saying beforehand?

4 Q Before hand or --

5 A It couldn't be afterward because I wasn't there.

6 Q Did you give him any instructions to do that?

7 A Not that I can remember.

8 Q Do you recall giving him any instructions to do that?

9 A Not that I can remember.

10 Q Did Mr. Gittinger ask Cameron for subsequent followup  
11 reports on the condition of experimental subjects?

12 A I was not there. I had nothing to do with the pro-  
13 ject, I don't know.

14 Q Did you instruct him to do that?

15 A To the extent that I was there and signed off on the  
16 project, I couldn't remember whether I instructed him to do  
17 that.

18 Q Do you recall issuing instructions for him to do  
19 that?

20 A I have no recollection.

21 Q Did you direct Mr. Gittinger to take any steps at  
22 all to assure the safety and well being of experimental subjects

1 at McGill?

2 A I don't have any remembrance of that.

3 Q You said you could not recall who the officer was  
4 who took over your responsibilities with respect to MKULTRA  
5 when you left TSD?

6 A That is correct.

7 Q You also said it could have been Bortner or  
8 Lashbrook, I think?

9 A It could have been other people.

10 Q Did you brief your successor in MKULTRA?

11 A I don't remember that.

12 Q Somebody took over MKULTRA, did they not?

13 A I don't even remember that. I presume that they  
14 did.

15 Q What discussions concerning MKULTRA did you have  
16 prior to your departure from TSD in 1957?

17 A I don't remember discussions about MKULTRA in that  
18 context. I might add, if it were Lashbrook or Bortner that  
19 took that job over, it wouldn't have been necessary to do any  
20 briefing in the areas you are talking about.

21 Q They knew everything you knew?

22 A Just about, sure. I think I will answer that question,

m10

1 yes, they knew everything I knew about it.

2 Q What did you tell your successor, chief of the  
3 Chemical Division about the Cameron Project?

4 A I don't remember what I told him.

5 Q What did you tell your successor at Chemical Division  
6 about supervising MKULTRA?

7 A I don't have any remembrance of that conversation.

8 Q What did you tell him about supervising the  
9 behavioral activities branch?

10 A The same answer. I don't have any remembrance of  
11 a conversation like that.

12 Q What did you tell him about supervising John  
13 Gittinger?

14 A I might say at this point that I don't remember any-  
15 thing about briefing any successor of mine about this whole  
16 area that you are talking about. I don't remember a conversa-  
17 tion that ever took place.

18 Q Did you tell anyone in TSD anything about supervising  
19 the Cameron Project prior to your departure in 1957?

20 A I have no remembrance of that.

21 Q You returned to Washington in 1960, Dr. Gottlieb?

22 A 1959.

m11

1 Q In April of 1960, Colonel Monroe wrote as Executive  
2 Director of the Human Ecology Fund that he was helping Cameron  
3 arrange Air Force funding for his research.

4 What do you know of that?

5 A Nothing.

6 Q What do you know of any funding other than the  
7 Society grant of Cameron by any agency, governmental, private?

8 A I have no information on that.

9 Q Did you ever discuss the Society grant to Dr. Cameron  
10 with anyone at the CIA or at the Society?

11 A Not to my remembrance.

12 (Witness and counsel confer)

13 MR. LICHTMAN: I would like the record to note that  
14 counsel just initiated a colloquy and arguably assisted the  
15 witness in what to answer at this point. I think that is  
16 quite inappropriate.

17 MR. STRICKLAND: I was simply suggesting to  
18 Dr. Gottlieb that if the question was: Did you talk to anyone  
19 at the CIA at any time about Dr. Cameron's project he might  
20 want to make absolutely certain his answer was correct.

21 MR. LICHTMAN: I think one can ask his own questions  
22 and elicit his own answers and not coach the witness.



1 MR. STRICKLAND: I was hardly coaching when I said  
2 it outloud.

3 THE WITNESS: At any rate, it doesn't change my  
4 answer.

5 MR. STRICKLAND: I was only attempting to make  
6 certain the answer was complete, probably as you intended the  
7 question to be.

8 BY MR. TURNER:

9 Q Did you ever discuss Dr. Cameron with anyone at  
10 CIA or at the Society?

11 A I have no remembrance of that.

12 What I am trying to say, in the contention of what  
13 was going on at the time, I might well have, but I have no  
14 remembrance of it. That is exactly what I mean.

15 Q Did you ever discuss the subject matter of  
16 Dr. Cameron's work with anyone at the CIA or at the Society?

17 A Not to my remembrance.

18 Q Did you ever got to Montreal?

19 A I have been to Montreal, sure.

20 Q When?

21 A To the best of my knowledge, in about 1971, it  
22 might have been '72, I took a bicycle trip to Montreal and

1 to Quebec and back.

2 Q That is the only time you have been to Montreal?

3 A To the best of my remembrance, that is true.

4 I certainly never went there in any connections with the  
5 project that you are talking about.

6 Q Outside of Montreal, have you ever been to Canada  
7 aside from the 1971 trip?

8 A Yes, in about 1972 or '73 I took a Canadian  
9 Pacific train on a two-week trip across Canada from Quebec.

10 Q That is the only occasion besides the Montreal  
11 bicycle trip?

12 A I might have crossed into Canada at Windsor. We  
13 had some family at the University of Michigan, and I visited  
14 there many times and I remember crossing the border once or  
15 twice, but aside from that.

16 Q Never have you traveled to Canada in addition with  
17 your employment with the CIA? *connection*

18 A Not to my remembrance. I want to just check my  
19 memory on that.

20 Q Take your time.

21 A I think my answer is no.

22 Q Did you ever talk by telephone to anyone in Montreal

1 concerning the Cameron research?

2 A Not to my remembrance.

3 Q Did you ever talk to anyone in Montreal concerning  
4 MKULTRA?

5 A Not to my remembrance.

6 Q Did you ever correspond with anyone in Montreal  
7 concerning either MKULTRA or did Cameron's research?

8 A Not that I remember.

9 Q Did you ever have any conversation in person, by  
10 telephone or any correspondence with Cameron?

11 A I didn't have any contact at all with him.

12 Q During the 1950s, did you attend a meeting of  
13 *professional*  
14 provisional organizations such as the American Psychiatric  
15 Association?

16 A I did not.

17 Q Any provisional organizations?

18 A Sure. I regularly attend meetings of the American  
19 Chemical Society.

20 Q Any others?

21 A Not that I can remember. I may have attended some  
22 other provisional meetings in that period but I couldn't  
remember that.

1 Q Did you ever have any conversation in person, by  
2 telephone or conduct any correspondence with anyone associated  
3 with McGill University?

4 A Not to my remembrance.

5 Q What do you know about any conversations or corres-  
6 pondence by any person connected to McGill University and anyone  
7 connected with the Society of the CIA?

8 A Other than what I read to you this afternoon, I  
9 don't have any remembrance of any others.

10 Q Did anyone tell you that Dr. Cameron left McGill  
11 University when more and more of his colleagues began to  
12 question the ethics and therapeutic validity of the experimental  
13 procedures he was conducting?

14 MR. STRICKLAND: Objection to the form.

15 THE WITNESS: Nobody told me that to my remembrance.

16 BY MR. TURNER:

17 Q Did anyone tell you that Dr. Cameron's successor  
18 as director of the Allen Memorial Institute ordered a follow-up  
19 study of the depatterning patients who had been subjected to  
20 those massive electroshock treatments that I described earlier?

21 MR. STRICKLAND: Objection as to the form.

22 THE WITNESS: Nobody told me that that I remember.

1 BY MR. TURNER:

2 Q Did anyone tell you that that study found that  
3 60 percent of his subjects reported memory losses of six months  
4 in ten years?

5 MR. STRICKLAND: Objection.

6 THE WITNESS: Nobody told me that. I want to make  
7 a qualifier, some of those statements, or question or two before  
8 that did come out in that ABC documentary.

9 BY MR. TURNER:

10 Q At that time, when you saw the ABC documentary,  
11 did you feel any responsibility to help the subjects of the  
12 CIA funded experiments at McGill?

13 A I was so outraged at the format of the whole program,  
14 I didn't have room for those kinds of feelings. That is my  
15 remembrance of this.

16 Q Do you feel any responsibility now?

17 A I feel I have been badgered so much in the last ten  
18 minutes that is what I am feeling now by questions that I told  
19 you time and again, I didn't have access to have answers to.

20 Q I will try to put it again. Consider Canadian  
21 citizens, Dr. Gottlieb, sought therapy and who instead were  
22 used as guinea pigs in the experiments I described who were

1 given massive electroshock treatments, LSD, psychic driving  
2 and sleep treatments, don't you think that those persons are  
3 entitled to some recompense for the injuries they suffered?

4 MR. STRICKLAND: Objection as to form and objection  
5 asking for a legal conclusion.

6 I will direct the witness not to answer.

7 (Witness and counsel confer)

8 MR. TURNER: You directed him not to answer that?

9 MR. STRICKLAND: Yes.

10 MR. TURNER: I will restate it again.

11 BY MR. TURNER:

12 Q Consider the Canadians who sought therapy who  
13 insisted they were used as guinea pigs in the experiments  
14 described in the Cameron application were given massive elec-  
15 tro shock treatments, LSD, physhic driving and sleep treatment,  
16 do you feel any responsibility towards those individuals,  
17 Dr. Gottlieb?

18 MR. STRICKLAND: Objection as to the form.

19 I find the question difficult, if not impossible to  
20 answer because it is undefined -- legal, ethical responsibility.

21 MR. TURNER: I said nothing about legal ethics.

22 Do you feel any responsibility for those people?

1 THE WITNESS: I find it very difficult to answer  
2 that question.

3 MR. STRICKLAND: I know you didn't say anything  
4 about legal or ethical responsibility. My problem, as I  
5 stated, it was so open-ended it is impossible to answer, what  
6 kind of responsibility to you mean?

7 THE WITNESS: I said I find it very difficult to  
8 answer that question. And I would rather not comment further  
9 on it.

10 BY MR. TURNER:

11 Q From what I have shown you out of the documents  
12 today and what I have just stated, would you authorize that  
13 kind of an experimental program were you in a position to do  
14 so today?

15 A That states a hypothetical case that I don't want to  
16 I now state.

17 MR. STRICKLAND: Objection, the question calls for  
18 sheer speculation. The case is predicated on a factual situa-  
19 tion that happened some years ago.

20 BY MR. TURNER:

21 Q There were grantees of the Society who knew they  
22 were receiving CIA funding, weren't there, Doctor?

1           A    I believe that is so. I can't mention it right now  
2 but that was probably true.

3           Q    Do you know who they are?

4           A    I couldn't think of those cases now.

5           Q    What Society grants were made to researchers other  
6 than Dr. Cameron at McGill University?

7           A    I will try to remember some but I am not --

8           MR. STRICKLAND: Could you repeat the question?

9           (Record read)

10          MR. TURNER: I will rephrase it.

11          BY MR. TURNER:

12          Q    What Society grants were made to researchers who  
13 were employed by McGill University other than the Society  
14 grant made to Dr. Cameron?

15          A    I didn't understand the question. I am not aware  
16 of any at McGill to whom the Society --

17          Q    Does a newsletter on trans-cultural psychiatry ring  
18 any bells?

19          A    It strikes a slight memory trace but I didn't asso-  
20 ciate that with McGill. I remember that was a title of  
21 research grant but I didn't remember -- true, researchers  
22 were at McGill.



1 Q What was the purpose of establishing that newsletter,  
2 Doctor?

3 A I don't remember. Do you happen to have a MKULTRA  
4 document on it and I can look at when it happened and I might  
5 be able to help you more.

6 Q Not with me.

7 Did the CIA have any connections or ties with the  
8 World Psychiatric Association?

9 A Not any ties that I remember being involved in or  
10 that I had any knowledge of.

11 Q Did anyone tell you that many of the organizers of  
12 the World Psychiatric Association were CIA funded researchers  
13 like Dr. Cameron while others were brainwashing experts like  
14 Dr. Willaim Sergeant of Great Britain?

15 MR. STRICKLAND: Objection as to form.

16 THE WITNESS: I was not aware of that.

17 BY MR. TURNER:

18 Q Did the CIA send representatives to the meetings  
19 of the World Psychiatric Association?

20 A They might have but I don't remember anything about  
21 that. I don't remember any TSD people being involved in that  
22 activity.

1 Q What do you know of Dr. Donald O. Hebb of McGill  
2 University?

3 A I recognize the name only as -- it comes to my mind  
4 as a neuropsychiatric researcher but I wouldn't be able to  
5 tell you before you told me that he was at McGill.

6 Q What do you know of the sensory deprivation experi-  
7 mentation Dr. Hebb conducted?

8 A I am very hazy about that now that you mention it.  
9 I connect that -- I don't remember anything about it.

10 Q Did anyone tell you or did otherwise become aware  
11 of the fact that Dr. Hebb did extensive consulting for  
12 Canadian intelligence during the '50's?

13 MR. STRICKLAND: Objection to form.

14 THE WITNESS: I was never aware of that.

15 BY MR. TURNER:

16 Q Did you know that Dr. Hebb was granted a CIA security  
17 clearance in 1964?

18 MR. STRICKLAND: Objection to form.

19 THE WITNESS: I didn't know that. I was not aware  
20 of that.

21 BY MR. TURNER:

22 Q Do you know why Dr. Hebb was granted such a clearance?

1 MR. STRICKLAND: Objection to form.

2 THE WITNESS: I do not know.

3 BY MR. TURNER:

4 Q Why was there so much activity at McGill?

5 MR. STRICKLAND: Could you explain that?

6 THE WITNESS: That is a pretty general question.  
7 Activity of what kind?

8 MR. TURNER: Connected with CIA?

9 THE WITNESS: CIA linked activity at McGill, I wasn't  
10 aware that there was so much. We talked about this MKULTRA  
11 project and you told me about Dr. Hebb. You are asking me  
12 why that was there, I don't have any more to impart to you than  
13 I have.

14 BY MR. TURNER:

15 Q Wasn't it because Canadian and British intelligence  
16 agencies were also funding activities at McGill?

17 MR. STRICKLAND: Objection.

18 THE WITNESS: What you are telling me now is news  
19 to me.

20 BY MR. TURNER:

21 Q Did you ever have any conversation by phone or in  
22 person or any correspondence with any Canadian government

1 official?

2 A Not to my remembrance.

3 Q Let me finish the question.

4 Concerning Society funded research or similar  
5 activity?

6 A Not to my remembrance.

7 Q Concerning the Cameron subproject?

8 A The same answer, not to my remembrance.

9 Q Concerning MKULTRA project as distinct from the  
10 Society?

11 A I never remember having any correspondence, contact  
12 by person or in person or phone with any part of the Canadian  
13 Government about anything.

14 Q Did you have any conversation in person or by phone  
15 or correspondence with any British Government official con-  
16 cerning Society funded research for similar activity?

17 A Not to my remembrance.

18 Q Concerning any other MKULTRA project?

19 A Not to my remembrance.

20 Q Were the Royal Canadian Mounted Police informed of  
21 the Society grant to Dr. Cameron?

22 A I don't know.

1 Q Did you inform them?

2 A I didn't inform them, no.

3 Q Was Canadian intelligence informed of the Society  
4 grant to Dr. Cameron?

5 (Witness and counsel confer)

6 MR. STRICKLAND: Dr. Gottlieb has responded to your  
7 previous questions which generally inquired in contacts between  
8 the United States and foreign governments.

9 This question, we interpret it as inquiring into  
10 an intelligence liaison relationship between CIA and Canadian  
11 intelligence as such the existence or non-existence of that  
12 could not be acknowledged.

13 On that basis, we lodge an objection and direct the  
14 witness not to answer.

15 I believe you can probably get the same information  
16 just by asking the general question was there any contact  
17 with the Canadian Government?

18 THE WITNESS: The answer is none of any kind that  
19 I am aware of.

20 MR. STRICKLAND: With any branch of the Canadian  
21 Government?

22 THE WITNESS: About these matters that I am aware.

1 BY MR. TURNER:

2 Q Was the intelligence agency of any country informed  
3 other than the United States --

4 A I will assume that Mr. Strickland's objection would  
5 cover that.

6 MR. TURNER: You are objecting.

7 THE WITNESS: He is directing me not to answer.

8 MR. TURNER: I would like for him to do so.

9 MR. STRICKLAND: Yes, we would object on the same  
10 basis.

11 BY MR. TURNER:

12 Q Was anyone connected in any fashion with the  
13 Canadian Government informed of the grant to Dr. Cameron?

14 A The answer is, not to my knowledge.

15 end mfm

16

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1 Q Was our State Department informed of the grant to  
2 Dr. Cameron?

3 A I have no information of that. I just don't know.

4 Q Did you inform them?

5 A No.

6 Q Did you inform them of any MKULTRA Project?

7 A Not that I remember.

8 Q The Canadian Government in correspondence with our  
9 plaintiffs has stated that they first learned of the CIA's  
10 sponsored experiments at McGill when the disclosure occasioned  
11 by John Marks' FOIA release occurred. The Canadian Government  
12 also stated that U.S. authorities expressed deep regret that  
13 funding from official U.S. sources had taken place from 1958  
14 to 1960 without informing the Canadian Government.

15 Do you regret the CIA sponsored the Cameron experi-  
16 ments at McGill?

17 MR. STRICKLAND: We object to form. I don't think  
18 you have an obligation to answer the question: Do you regret or  
19 do you think you were morally wrong or any similar question.

20 MR. TURNER: You direct him not to answer?

21 MR. STRICKLAND: Yes.  
22

is-2

BY MR. TURNER:

1  
2 Q How many subprojects were there in MKULTRA, Dr.  
3 Gottlieb?

4 A I don't remember that. That is a very confusing  
5 question because MKULTRA Projects were numbered sequentially.  
6 In other words the same project as it got renewed for several  
7 years would get a new number. The only thing I can answer that  
8 might be helpful, there were numbers up to 160 or so that I  
9 remember, maybe even higher, but I have no remembrance that  
10 even begins to be precise about what number of project that  
11 represents.

12 Q What portion of the projects included under MKULTRA  
13 involve CIA funding of outside research on LSD?

14 A Anything I said now about that would be speculative.  
15 I don't know.

16 Q How many projects involve CIA funding of outside  
17 research on LSD?

18 A I just don't have a figure on it.

19 Q Did Robert Hyde of the Boston Psychopathic Hospital  
20 conduct LSD research for the CIA?

21 A Yes.

22 Q Was that research funded by MKULTRA?



is-3

1 A I think so.

2 Q Doctor, what time period was Dr. Hyde's research  
3 funded by CIA?

4 A To the best of my recollection, that was in the  
5 late 50's, middle of late 50's, I would guess 55. I could be  
6 wrong.

7 Q Who supervised that project?

8 A I can't remember.

9 Q Please describe the research Dr. Hyde conducted  
10 for the Agency?

11 A I can only describe the general, the most general  
12 description of it. They were associated with Harvard University  
13 and they did a series over several years of experiments on  
14 voluntary Harvard University students, on some volunteer staff  
15 members of Boston Psychopathic Hospital and they did some work  
16 on patients at the hospital towards the end of investigating the  
17 psychotherapeutic possibilities of LSD.

18 Q Dr. Hyde knew he was working with the CIA, didn't  
19 he?

20 A Yes, he did.

21 Q Did Harold Abramson at Mount Sinai Hospital and  
22 Columbia University conduct LSD research for the CIA?

1 (Witness and counsel confer.)

2 THE WITNESS: What was the question?

3 (The reporter read the pending question.)

4 (Witness and counsel confer.)

5 (The reporter read the pending question.)

6 MR. STRICKLAND: The problem that we are having  
7 with the question is that some projects and researchers have  
8 not been acknowledged and are being protected in litigation  
9 at the present time. Dr. Gottlieb is uncertain what the con-  
10 straints are and I certainly don't have the information in my  
11 fingertips. Do you have anything which can help us?

12 MR. TURNER: As to Abramson?

13 THE WITNESS: Or Hyde for that matter.

14 MR. STRICKLAND: You are aware of the Symms Case?

15 MR. TURNER: Yes.

16 MR. STRICKLAND: There are over 100 researchers and  
17 projects and I am uncertain as to the details of exposure. I  
18 believe Dr. Gottlieb would be hesitate to make an unauthorized  
19 disclousre. However, if you can help us we may be able to get  
20 us over a hurdle.

21 MR. TURNER: I am surprised that Abramson had  
22 occasion to raise such a problem. I don't even know if an

<sup>lodged</sup>  
1 objection has been alleged.

2 MR. STRICKLAND: Abramson -- I am saying that I  
3 am uncertain and if you can help me, we can get off the hurdle.

4 THE WITNESS: The role of Dr. Abramson in the Olson  
5 matter has certainly been acknowledged but you are talking  
6 about another area now and I am not sure what has been done  
7 about that.

8 MR. STRICKLAND: The easiest way would be, you  
9 obviously reviewed a lot of the FOIA documents released for  
10 Marks, was it released in there?

11 MR. TURNER: No, I can't answer that, I don't know  
12 at this time.

13 MR. STRICKLAND: That is my problem, and I apolo-  
14 gize.

15 MR. TURNER: I am going to ask the question, did  
16 Harold Abramson, of Mount Sinai Hospital and Columbia University  
17 conduct LSD research for CIA?

18 MR. STRICKLAND: I would tentatively object.

19 MR. TURNER: That question has been answered in the  
20 discussion of Dr. Olson in that Dr. Gottlieb stated that Olson  
21 was sent to Abramson because Abramson had conducted LSD research.

22 THE WITNESS: I said that Abramson was one of the

1 most knowledgeable people we knew in the field of LSD and human  
2 service. I said nothing about what the CIA did or didn't spon-  
3 sor in the way of research for him.

4 MR. STRICKLAND: That was my understanding.

5 BY MR. TURNER:

6 Q Did Harold Abramson of the Mount Sinai Hospital  
7 and Columbia University conduct LSD research for the CIA?

8 MR. STRICKLAND: The government would lodge an  
9 objection, albeit tentative, on the basis of security con-  
10 siderations. I am uncertain whether information responsive to  
11 this question has been officially released by the Executive  
12 Branch. I will be glad to check this out for you and we can  
13 go from there.

14 MR. TURNER: You direct him not to answer?

15 MR. STRICKLAND: Yes.

16 BY MR. TURNER:

17 Q Did the CIA use the Josiah Macy Foundation as a  
18 funding conduit during the 1950's to support LSD and other  
19 research?

20 A I will raise the same question. I don't know whether  
21 that is public information.

22 (Witness and counsel confer.)

1 MR. STRICKLAND: We will raise the same tentative  
2 objection.

3 MR. LICHTMAN: If you will check further and let us  
4 know whether you will persist in this objection?

5 MR. STRICKLAND: You had indicated that the  
6 deposition will probably be continued for a third day. You  
7 understand, it is not a matter of persisting or interposing  
8 frivolous objection, it is simply, I wouldn't want Dr. Gottlieb  
9 to take a deposition in behalf of the government and inappro-  
10 priately reveal something which the government is trying to  
11 protect in another case.

12 MR. LICHTMAN: Let us know at the outset of the  
13 third day.

14 MR. STRICKLAND: I will.

15 MR. TURNER: Can you do it by May 27 when the rest  
16 of this stuff comes over?

17 MR. STRICKLAND: I don't think that would be a  
18 major problem.

19 Abramson at Columbia and Mount Sinai --

20 MR. TURNER: I will not, at this point, go through  
21 all of the questions which relate to Dr. Abramson or the Josiah  
22 Macy Foundation but I will reserve the right to question on

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1 those matters.

2 MR. STRICKLAND: That is very agreeable.

3 BY MR. TURNER:

4 Q Did Carl Pfeiffer of the University of Illinois  
5 Medical School, Emory University and the Atlanta Federal Peni-  
6 tentiary conduct LSD research for the CIA?

7 A Yes.

8 Q Was that research funded by MKULTRA?

9 A Yes.

10 Q Was that research later funded by MKSEARCH?

11 A I really don't remember that. Those cryptonyms con-  
12 fuse me.

13 Q During what period of time did Dr. Pfeiffer receive  
14 money from the CIA?

15 A I can only estimate, approximate it somewhere in the  
16 period of '53 and '54 and perhaps '62.

17 Q Who supervised that project?

18 A I don't remember.

19 Q What were your responsibilities with relation to  
20 Dr. Pfeiffer's project?

21 A I was the Chief of the Chemical Division or Chemi-  
22 cal Branch and that was the name of the organization that as  
such had overall responsibility for MKULTRA.

1 Q Please describe the research Dr. Pfeiffer con-  
2 ducted for the CIA?

3 A As I remember, he did several researches over the  
4 period of years. He had a group of voluntary prisoners at the  
5 Atlanta Penitentiary regarding the study of LSD and its affects  
6 on humans. He did some work with us looking into the properties  
7 and material called meretran, analeptic substances. He was  
8 involved also together with a chemist named -- I forget his  
9 name -- into looking at the physiological activity of several  
10 chemical compounds on animals. He did several other things, I  
11 don't remember them, but those are typical.

12 Q You stated that one of those projects involved  
13 research with volunteer prisoners. What is the basis for  
14 your statement that those prisoners were volunteers, Dr. Gott-  
15 lieb?

16 A What is the basis for my statement they were volun-  
17 teers, based on the protocol that I remember being presented to  
18 the project and some of the reports afterwards.

19 Q You examined the protocol in Dr. Pfeiffer's project?

20 A I either examined it myself or someone else did and  
21 told me about it.

22 Q Pfeiffer knew he was working for the CIA, didn't he?

s-10

1 A Yes, he did.

2 Q Did Harris Isbell of the National Institute of  
3 Mental Health in the Addicts Research Center in Lexington, Ken-  
4 tucky conduct LSD research for the CIA?

5 MR. STRICKLAND: May we interpose the same tentative  
6 objection and take the matter under advisement when we  
7 reconvene?

8 MR. TURNER: On the same basis as the other one?

9 MR. STRICKLAND. If you would please give me a  
10 call Monday if you have anything that comes to mind that would  
11 help me, I would appreciate it.

12 MR. TURNER: I can respond now. Dr. Isbell testified  
13 in 1975 about the research that was conducted with LSD at Lexing-  
14 ton. If I can have a moment. He does have a CIA acknowledge-  
15 ment.

16 MR. STRICKLAND: I think that statement of Dr.  
17 Isbell would indicate that matter has been acknowledged. Dr.  
18 Gottlieb would be free to testify about that.

19 BY MR. TURNER:

20 The question pending -- I will restate. Did Harris  
21 Isbell of the National Institute of Mental Health and Addict  
22 Research Center in Lexington, Kentucky conduct LSD research



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1 for the CIA?

2 A Yes.

3 Q Was that research funded by MKULTRA?

4 A I am not sure. That was one government agency  
5 to another and it may have had some other funding mechanism,  
6 it might have been a transfer of funds to NIMH. I don't  
7 remember whether it had a MK number. It would have been a dif-  
8 ferent administrative arrangement. One being that the Bureau  
9 of NIMH could conceivably have its own reasons for doing this  
10 LSD research.

11 Q It was funded through the Chemical Division at TSD,  
12 was it not?

13 A I think so.

14 Q During what period of time?

15 A I can't remember that. The other testimony might  
16 help but I don't remember it being in -- but I remember it being  
17 in the late, middle late '50's.

18 Q Who supervised that project?

19 A I think Dr. Bortner was the supervisor of it.

20 Q Is he dead?

21 A Yes.

22 Q What were your responsibilities with regard to that  
project?

1           A        As Chief of the Chemical Branch or Chemical Division  
2 I had overall responsibility for this area of research.

3           Q        Please describe the research Dr. Isbell conducted  
4 for the CIA?

5           A        He did several things for us. He, on volunteer  
6 subjects at the Narcotics Division Hospital at Lexington,  
7 he performed some of the early and basic work on the relation-  
8 ship between dose and response of LSD, in particular was inter-  
9 ested and got useful data on effects called adaptation, when a  
10 person ingested LSD repeatedly, prepeatedly, two or three times,  
11 the effects diminished. So those were two of the principal  
12 areas.

13                    He also did some work on inhibitors of LSD activity,  
14 other drugs that would terminate the actions of LSD.

15           Q        You stated that those experiments were performed on  
16 volunteer subjects. What is the basis for your statement that  
17 the subjects were volunteers, Dr. Gottlieb?

18           A        I, myself, visited the hospital several times,  
19 talked with Dr. Isbell, witnesses some of these experiments.

20           Q        When were those visits?

21           A        As I say, the best I can locate them, is the middle  
22 50's.

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2

Q How did Dr. Isbell obtain subjects for the experiments he was conducting?

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A As far as I can remember, he put out a call for volunteers and there were certain rewards to volunteering. I really don't remember what those rewards were, or the inducement to become a volunteer, but I remember Dr. Isbell being particularly interested in the fact that these were so-called drug-wise subjects, subjects that were used to getting, ingesting drugs of various types and therefore being rather sophisticated about reporting their effects.

Q What was the population of the Addicts Research Center in Lexington composed of?

A I think they were people with a history of narcotics addiction and I don't remember whether they voluntarily committed themselves or were legally committed, were in there for rehabilitation purposes.

Q Did anyone ever tell you that Dr. Isbell offered those people who were in there for addiction rehabilitation narcotics in exchange for participating?

A Yes, I think I was aware of that at the time.

Q You also stated that Dr. Isbell conducted research on adaptation to LSD. Did you ever hear that Dr. Isbell kept

is-14

1 seven men on LSD for 77 consecutive days?

2 A I don't remember that particular fact.

3 Q Is that consistent with the research he was con-  
4 ducting on the adaptation effects of LSD?

5 A I really can't answer that accurately. All I can  
6 say, it would be consistent with that research goal. You bring  
7 to mind another goal he had, I think he had some interest  
8 in the quantum effects of LSD, repeated ingestion. And whether  
9 those prolonged repeated administrations were in line of running  
10 this adaptation out to its ultimate end or whether he was inter-  
11 ested in those experiments in the chronic effects of LSD, I  
12 am not sure.

13 Q How often did you visit the Addicts Research Center  
14 in Lexington?

15 A I don't have a precise figure on that.

16 Q The best of your recollection?

17 A At least three or four times.

18 Q Dr. Isbell knew he was working for the CIA, didn't  
19 he?

20 A Yes.

21 MR. TURNER: Why don't we take a five minute stretch?

22 (A brief recess was taken.)

1 MR. TURNER: Back on the record.

2 BY MR. TURNER:

3 Q Did Louis Jocelyn West of the University of Oklahoma  
4 conduct LSD research for the CIA?

5 A I would have to ask that same question. <sup>A</sup> I don't  
6 have a good memory. The name is familiar. If he did and if I  
7 knew about it, shouldn't you look into it?

8 MR. TURNER: You are entering an objection? We  
9 have agreed to determine whether you will permit Dr. Gottlieb  
10 to testify on questions as to Dr. West.

11 MR. STRICKLAND: We would treat it the same way we  
12 would treat the questions about Abramson and Josiah Macy Foun-  
13 dation and now Dr. West at the University of Oklahoma.

14 Q Did Harold Hodge of the University of Rochester  
15 conduct LSD research for the CIA?

16 A I think you have to treat it the same way.

17 MR. STRICKLAND: The same basis.

18 MR. TURNER: So there would be no mistake on the  
19 record, I do have additional questions on those researchers.

20 MR. STRICKLAND: Understood.

21 MR. TURNER: No waiver as to additional questions.

22

1 BY MR. TURNER:

2 Q Did Dr. Burch of Baylor University conduct LSD  
3 research for the CIA?

4 A I have no remembrance of that.

5 MR. STRICKLAND: The same tentative objection,  
6 the same basis as the previous one.

7 THE WITNESS: Even if you acknowledge it, I couldn't  
8 tell him anything about it. I don't remember this one.

9 MR. TURNER: You will tell us whether Burch's affil-  
10 iation or nonaffiliation with the Agency is the subject of ack-  
11 nowledgement, however?

12 MR. STRICKLAND: Yes.

13 (Witness and counsel confer.)

14 BY MR. TURNER:

15 Q At our last session you mentioned a Dr. Cook as a  
16 researcher who worked with MKULTRA. Did Dr. Cook conduct  
17 research for the CIA?

18 A Yes. Although I mention that, I need to check on  
19 that. He is in the same category as everybody else.

20 MR. STRICKLAND: Is that C-o-o-k at what univer-  
21 sity?

22 MR. TURNER: I don't have an institution.

1 MR. STRICKLAND: Do you remember where he mentioned  
2 it in his deposition?

3 BY MR. TURNER:

4 Q At that last session you also mentioned a Dr.  
5 Himwich, I believe, H-i-m-w-i-c-h. The same thing. You have  
6 already testified he conducted research with Meretran for the  
7 CIA?

8 A I mentioned that before in addition with Pfeiffer.  
9 Meretran is an analeptic which is a stimulant, one of those  
10 things that keeps you awake and charges you up.

11 Q What was the CIA's interest in that?

12 A The same general interest we had in the materials  
13 and techniques which could create major changes in human behavior

14 Q Will you explain how that fits into that concern  
15 with major changes in human behavior?

16 A Sometimes people are kept awake as a pressure  
17 mechanism.

18 Q In interrogation?

19 A Interrogations or in attempts to influence them.

20 Q During what period did Dr. Himwich conduct that  
21 research?

22 A I would like to wait and hear a determination as to

1 whether the CIA is officially acknowledging that research.

2 MR. LICHTMAN: You already gave substantial testi-  
3 mony.

4 MR. STRICKLAND: If you could help the doctor by  
5 indicating what exactly he testified to instead of terms of  
6 substantial.

7 MR. LICHTMAN: He said three things, he said he  
8 worked with us, he worked in a mental institution, he worked  
9 in Meretran. Having said that, I think you could answer the  
10 rest of the question.

11 MR. TURNER: This one is a slightly different pos-  
12 ture. There has been testimony.

13 MR. STRICKLAND: That is my problem. You say there  
14 has been testimony. I don't specifically recall it. I am not  
15 saying there wasn't. I am simply --

16 THE WITNESS: I saw it here when I proofread it.

17 MR. TURNER: We will defer on this one but I do  
18 emphasize that this is under considerably different circumstances  
19 and I will come back to this topic regardless of the Agency's  
20 statement as to its current willingness to acknowledge the  
21 connection with Dr. Himwich.

22 MR. STRICKLAND: I understand. I understand your



1 position that you feel there is a factual difference here. I  
2 would only note--and you do have a right to come back --I would  
3 only note that even if Dr. Gottlieb inadvertently and by acci-  
4 dent revealed information which is still properly protected,  
5 that that does not in any way constitute a waiver or declassifi-  
6 cation of that information.

7 So I think the easiest way to handle all of this  
8 is, we will take it under advisement and when we will reconvene  
9 we will advise you of its provision and we will go from there.

10 BY MR. TURNER:

11 Q At that last session you also mentioned certain  
12 research conducted for the CIA in Detroit or Wayne County. Who  
13 conducted that research?

14 A I said that I didn't remember and I don't remember  
15 now.

16 Q That has not come to you between the two depositions?

17 A No, it has not.

18 Q During what period did the research at Detroit  
19 receive CIA funding?

20 A I don't remember that.

21 Q Can you give us an approximation, Doctor?

22 A 1953 to 1960.

1 Q Please describe that research in Detroit?

2 A I don't remember.

3 Q Was it funded by MKULTRA?

4 A I don't remember that. I don't remember whether  
5 it predated or postdated it.

6 MR. STRICKLAND: Dr. Gottlieb testified to these  
7 matters when Mr. Rauh was asking him to try to recall any pos-  
8 sible MKULTRA project. On page 143 of his deposition, his pre-  
9 vious deposition, he testified that there was a project there,  
10 a man in Detroit connected with some mental institution in  
11 Wayne County to study LSD.

12 MR. TURNER: I know that is there. I am trying to  
13 find out what else Dr. Gottlieb recollects about it.

14 BY MR. TURNER:

15 Q You testified before that it involves LSD. What  
16 was the involvement with LSD, Dr. Gottlieb?

17 A I don't remember.

18 Q Who was responsible for that project?

19 A I don't remember that either.

20 Q Did those researchers know they were working for the  
21 CIA?

22 A I don't have a remembrance of that.

1 Q You knew a George White while you were at the CIA,  
2 didn't you?

3 A Yes, I did.

4 Q Is that an alias? He had an alias, did he not?

5 A Yes.

6 Q What was it?

7 A Morgan Hall.

8 Q What were his functions?

9 A He went through a period where he was a consultant  
10 to us and talked to him about psychogenic drugs because he  
11 had some experience with a drug that I spelled for you, tetrahydro-  
12 cannabinal, an active ingredient in marijuana, and then we  
13 had an arrangement with him where he administered LSD for  
14 purposes of the Bureau of Narcotics getting information from  
15 informants and would report to us on what the results of those  
16 were.

17 Q When did he become a consultant to the Agency?

18 A Approximately in 1952, 1953.

19 Q When did he begin to conduct the LSD test that he  
20 reported on to the Agency?

21 A Approximately 1954 or thereabouts, I don't remember  
22

1 the exact dates.

2 Q Those tests were funded by MKULTRA, weren't they?

3 A When you say funded, we never -- we supported the  
4 facilities and provided the LSD.

5 Q And that was through MKULTRA, was it not?

6 A I think so.

7 Q How long did that relationship with Mr. White  
8 continue?

9 A I am not sure, but it continued for three or four  
10 years. I am not sure what the precise length of that term was.

11 Q Who supervised Mr. White on behalf of the CIA?

12 A There is some confusion in my mind about that. My  
13 remembrance is that Dr. Lashbrook was the regular link advisor  
14 to White, but I saw him from time to time also.

15 Q When did you first become involved with Mr. White?

16 A I said 1952.

17 Q You personally?

18 A 1952. I think that was the question you asked  
19 earlier. I was the one who made the original contact, had the  
20 original conversation with him.

21 Q At CIA? You were the original person from CIA who  
22 made contact with Mr. White?

Take 8

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1 Q Did you tell him you were going to be -- that you  
2 condoned drug testing at the facilities that you were supporting  
3 for Mr. White?

4 A As I say, I couldn't remember what level of detail.  
5 I don't remember whether I told him that or not.

6 Q The CIA paid for the safe houses in New York City,  
7 San Francisco and Marin County, didn't it?

8 A The one at Marin County, I couldn't attest to it.  
9 Certainly the ones in New York and San Francisco I have per-  
10 sonal knowledge of, but the Marin County, I heard about, I was  
11 overseas when it took place.

12 Q Did you ever visit the safe house in New York City?

13 A Yes.

14 Q Please describe it.

15 A I believe it was somewhere near 6th Avenue downtown  
16 Manhattan area, called the Avenue of the Americas. It was  
17 a small three-room apartment, about a 5 to 8 story apartment  
18 house, and it was equipped with one way mirror so that things  
19 going on in the one side of the mirror could be viewed from the  
20 other side.

21 Q The one way mirror was not in the house at the  
22 time it was -- the apartment at the time, it was leased, was it?

1 A I think it was installed afterwards.

2 Q By whom?

3 A I don't remember that.

4 Q Did the Agency pay for it?

5 A I think so.

6 Q What do you know of the activities by Mr. White in  
7 that New York safe house?

8 A I don't know anything about that and I don't know  
9 whether in fact how many times you ran these ministrations.  
10 I know more about the West Coast.

11 Q Apart from the activities of Mr. White in the  
12 New York City safe house in addition with LSD, what do you know  
13 of the activities conducted by officials --

14 A I don't recall anything about other activities  
15 located there. I don't recall other use made of that safe house  
16 with the Bureau of Narcotics.

17 Q Aside from the activities of Mr. White, what do you  
18 know of any activities in the New York safe house involving  
19 LSD?

20 A That is different than the last question. My  
21 answer is the same as the last question, I am not aware of  
22 other activities involving LSD.

1 Q What was the occasion of your visit to the New York  
2 safe house?

3 A I don't remember that specifically. Generally it  
4 had to do with looking at it since we were paying for it; it  
5 was an unusual activity and I wanted some first-hand infor-  
6 mation on what the money was being spent for.

7 Q You authorized other payments to this activity, did  
8 you not?

9 A Yes. Now, there is some inaccuracy in here because  
10 the impression that White was related to this -- we are really  
11 talking about something that happened when White was on the  
12 West Coast and there was another supervisor whose name I don't  
13 remember, that Dr. Triechler mostly dealt with. And White --  
14 at least the safe house I am thinking about -- White had little  
15 or nothing to do with. And I don't know whether it was ever  
16 used for any LSD work.

17 It was at a period it may overlap with the West  
18 Coast safe house. It was at a later period.

19 Q This is terribly confusing.

20 A I met White when he was involved in New York. Soon  
21 after that he was transferred at the time after that to the  
22 West Coast and I continued our relationship with him there.

1 Sometime after that, the safehouse I am talking about in New  
2 York was set up by Triechler and a narcotics person in  
3 New York. However much that helps you. I, myself, am confused  
4 about the time elements, but that is the best I can lay it  
5 out.

6 I am trying to be as helpful as I can. I have a  
7 slight memory of some ad hoc arrangements that White made in  
8 New York before he left. He may have used a place that he  
9 rented temporarily and set up and then they were abandoned  
10 or that was terminated, that arrangement, when he moved to  
11 the West Coast. And, as I say, there may be two things we  
12 are talking about in New York, one run by White for a very  
13 short time before he left there and another one later.

14 As far as making a facility available to the Bureau  
15 of Narcotics by CIA, the one I was talking about first related  
16 to the latter arrangement which went on for a year or two.  
17 And I am not aware of any activity that took place in that.

18 Q Dr. Triechler set up that later safe house you just  
19 indicated?

20 A Yes, with another, not Mr. White.

21 Q Who was the other supervisor?

22 A I don't remember his name.



1 Q When did White leave New York City?

2 A Approximately '54, thereabouts, '53.

3 Q What were the circumstances of his departure?

4 A I think he was transferred.

5 Q What is the basis of that statement?

6 A I don't know.

7 Q What do you know of any activity vis-a-vis LSD or  
8 other drugs conducted by Mr. White prior to his departure from  
9 New York City?

10 A I have a memory that he might have administered LSD  
11 to his own contacts and informants several times, by that I  
12 mean four or five times before he left New York City.

13 Q Did he report to you on those, or someone at CIA, on  
14 those incidents?

15 A In an informal way, yes.

16 Q What do you mean by "informal"?

17 A He verbally passed them on to somebody and I became  
18 aware of him -- he might have told me about one or two directly  
19 but that is what my remembrance is.

20 Q It was not committed to writing?

21 A No, as far as I remember.

22 Q What did he tell you about those five or six  
incidents?

1           A           I couldn't remember whether he told me directly  
2 but by and large they involve sort of one-time administration  
3 of LSD and talking about persons getting disoriented and most  
4 of them involve kind of a high experience.

5           Q           Was a doctor present?

6           A           The circumstances of all of Mr. White's work on  
7 LSD precluded the attendance of a doctor.

8           Q           So as to those five or six incidents, the answer is  
9 no?

10          A           No, as far as I know.

11          Q           What do you mean the circumstances of Mr. White's  
12 work precluded the attendance of a doctor?

13          A           I meant he wasn't conducting experiments in the  
14 conventional sense of a control experiment. He was adminis-  
15 tering LSD for operational purposes and his Bureau of Narcotics  
16 work. He was contacting informants, he was making buys of  
17 drugs and whatever it is the Bureau of Narcotics people did  
18 operational at that time.

19          Q           Still directing your attention to New York, to  
20 those five or six times, did Mr. White tell the individuals  
21 receiving LSD that they were going to receive a drug?

22          A           Certainly not.

1 Q Those individuals were unwitting participants  
2 for the administration of the LSD?

3 A That is correct.

4 Q Where were the five or six unwitting LSD tests by  
5 Mr. White in New York City conducted?

6 A I don't remember that. As I said, I have only a  
7 vague remembrance whether in fact he set up the facilities.  
8 That is my remembrance that he dismantled and moved to the  
9 West Coast.

10 I assume that took place wherever that facility  
11 was.

12 Q The detailed description of the three-room apartment?

13 A That is the one that Dr. Triechler set up.

14 Q What was the purpose of that later second safe house?

15 A My remembrance is that it was for any similar  
16 activities if they came up, if the opportunities presented  
17 themselves, that is my general remembrance. As I said,  
18 I don't remember any specific drug administration that took  
19 place there.

20 Q Was that funded by MKULTRA?

21 A You are talking about the second one?

22 Q The second one.

1           A     I presume that. The first one in New York that  
2 I talked about may have predated MKULTRA.

3           Q     Mr. White's point of contact with the CIA for his  
4 entire connections with the Agency was through the Chemical  
5 Division in TSS; is that correct?

6           A     Yes.

7           Q     Either you or Mr. Lashbrook?

8           A     Formally it was Lashbrook.

9           Q     Moving to the San Francisco safe house, you stated  
10 that you had greater knowledge of that.

11                     Would you, please, tell us about it?

12           A     Well, it is just that that lasted for a longer number  
13 of years. As I remember, that was for three or four years and  
14 there were more drug administrations made there.

15                     Let me ask for some advice here.

16                     (Witness and counsel confer)

17           BY MR. TURNER:

18           Q     You were in the midst of telling us about the San  
19 Francisco safe house activities?

20           A     I need to be reminded what the last question was.

21           Q     Will you, please, describe the San Francisco safe  
22 house activity?

1           A     It was sort of a three-room arrangement with a one-  
2 way mirror between two of the rooms and it was a place where  
3 White would administer LSD to potential informants or drug  
4 contacts.

5           Q     Was the room equipped for electronic surveillance?

6           A     I don't remember that, although it may well have  
7 been.

8           Q     Photographic surveillance?

9           A     Yes. I have a remembrance of that being true.

10          Q     Still pictures rather than movies or both?

11          A     I don't remember the details.

12          Q     You stated that White went to San Francisco around  
13 '54. This safehouse out there was established upon his arrival  
14 or shortly thereafter?

15          A     Yes.

16          Q     How long did that activity continue?

17          A     As I said, I think it was for about three or four  
18 years.

19          Q     That would have been '58?

20          A     Something like that. I am hazy on those dates.

21          Q     What do you know of Mr. White's activities in  
22 relation to that safe house?

1           A     He said, he used it to administer LSD to potential  
2 drug informants and other drug contacts, contacts related to  
3 his work in the Bureau of Narcotics.

4           Q     What was the purpose of administering LSD to those  
5 individuals?

6           A     I am not sure I know what all of his purposes were,  
7 but they were generally to get information to facilitating  
8 drug buys and that sort of thing.

9           Q     Did the CIA provide LSD to that San Francisco safe  
10 house also?

11          A     Yes.

12          Q     How does administering LSD to someone assist in  
13 getting information from them?

14          A     That is what he was trying to find out for himself  
15 and that was information that we were interested in. I think  
16 our final conclusion that it was a very variable thing and very  
17 situation dependent and was in fact not a reliable way to get  
18 information.

19          Q     Was LSD used as an adjunct to more conventional  
20 interrogation techniques in the activities of Mr. White?

21          A     I don't really remember that. I only know that he  
22 used his safe house for many non-LSD related Bureau of Narcotics

1 activities. It was used as a safe house for their operational  
2 purposes and some of the time he administered LSD.

3 Q How does administering LSD to an individual facilitate  
4 a drug buy?

5 A I think that is what he was trying to find out and  
6 I think his conclusion was just as an interrogation aid, it  
7 doesn't work very well, it doesn't work reliably.

8 What he was hoping was that it would make an indi-  
9 vidual less inhibited, less careful, indiscreet.

10 Q What do you mean when you say "facilitate a drug  
11 buy"?

12 A Making it easier for him to carry of an operation,  
13 which I understand is always a very tricky, one of the con-  
14 vincing a potential drug seller that you are a real buyer and  
15 not a narcotics agent.

16 Q How many such administrations of LSD occurred in  
17 addition with the San Francisco safe house activity?

18 A I can only give you an order of magnitude.

19 Q Please do.

20 Q 30 or 40. I don't know if you remember, but in the  
21 Kennedy testimony, that was the point of some contention. Some  
22 seemed to think the number was more like 200 and I told them,

1 and I am telling you now, that is a ridiculous figure.

2 Q And those administrations of LSD, were they completely  
3 unwitting?

4 A Yes.

5 Q As to those San Francisco administrations, there was  
6 no doctor present?

7 A There was no doctor present.

8 Q Were all of the LSD administrations conducted by  
9 Mr. White conducted physically within the safehouse?

10 A I am not sure that they all took place there.  
11 I would say most of them did.

12 Q Did Mr. White test methods of administering drugs  
13 unwittingly to individuals, the techniques of slipping drugs  
14 to individuals?

15 A I am not really -- I don't have a clear memory of  
16 that, certainly he had to do that in order to carry out his  
17 kind of an operation and that was never systematically done.  
18 He didn't have an organized way of investigating, is what I am  
19 trying to say. It was incidental. It was an incidental body  
20 of information that derived from the work he was doing.

21 Q Did Mr. White test paraphernalia that had been  
22 prepared by TSD or other technical sections of the CIA which



1 was designed to slip drugs to unwitting individuals, such as  
2 swizzle sticks?

3 A Yes, he did some of that work, but as I say, it was  
4 not a systematic organized way.

5 Q Did you ever see photographs of Mr. White engaged  
6 in the activities he conducted at the San Francisco safe house?

7 A I never saw photographs of it, no.

8 Q Did you ever hear sound recordings?

9 A I didn't, no.

10 Q What do you know of the existence of either of those?

11 A I have a vague memory that that kind of information  
12 exists, but I don't know how much it was, as I say, I didn't  
13 myself see it.

14 Q Did Mr. White administer LSD as part of his  
15 activities in San Francisco?

16 A I don't have that accurate a recollection on it but  
17 he probably did. When I talk about 30 or 40, whatever number  
18 was done by people other than himself, was included in that.

19 Q What is the basis of your being so certain about  
20 30 or 40, Doctor?

21 A Just my acquaintance with the whole project, the  
22 amount of money he used, the number of reports he sent back to

1 us, the amount of LSD we gave him -- it was a combination of  
2 all of those things.

3 Q As to the New York activity of Mr. White, you stated  
4 that he reported informally and orally; is that correct?

5 A Yes.

6 Q As to the San Francisco activity?

7 A He reported in writing.

8 Q Written reports. After each administration?

9 A Pretty much. He may have accumulated several of  
10 them.

11 MR. TURNER: We will be requesting those reports.

12 THE WITNESS: They were all destroyed. They don't  
13 exist anymore.

14 MR. TURNER: We will still be requesting that the  
15 Agency check to be sure that those materials did not --

16 THE WITNESS: That ~~was all done.~~

17 MR. STRICKLAND: Reports from White?

18 THE WITNESS: They were specifically destroyed when  
19 the files were destroyed in '72, '73.

20 MR. STRICKLAND: I think they were but I will be  
21 glad to check.

22 MR. TURNER: Certain of the documents that purported

1 to be destroyed have turned up since then, Doctor.

2 THE WITNESS: That is not true.

3 MR. STRICKLAND: Don't worry about it. We will  
4 check it.

5 THE WITNESS: The reason I have an interest in that,  
6 if we are going to hold these depositions in those materials  
7 found, it will go on forever. I have a special interest.

8 MR. LICHTMAN: We have a special interest in it  
9 not going on forever.

10 THE WITNESS: The research for these things could  
11 take a long time. I may be appearing a little short, I am  
12 patient, I am getting very tired.

13 BY MR. TURNER:

14 Q If you would like to stop, please say so.

15 A We can go on until 6:00.

16 Q If you are fatigued and it is, even if not inter-  
17 fering with your ability to answer, please say so and we will  
18 be glad to recess?

19 A Let's go on until the time we plan.

20 Q Did Mr. White test other drugs aside from LSD  
21 either in New York or in San Francisco?

22 A He might have but I don't have a remembrance of that.

1 I might have, for instance, checked out this meretrice once  
2 or twice but I don't have a clear remembrance of that.

3 Q What about tetrahydrocannabinol?

4 A Tetrahydrocannabinol, no, I don't think he used that.

5 Q George White arranged for CIA officers to inter-  
6 view prostitutes at the San Francisco safe house?

7 Please tell us about that activity.

8 A I don't have any specific information on that.  
9 Gittinger would be a much better source to question him about  
10 it.

11 MR. STRICKLAND: Objection to the form.

12 I believe and I just offer this to be helpful,  
13 I believe that is incorrect. The way you describe the use of  
14 prostitutes.

15 MR. TURNER: My statement was George White arranged  
16 for CIA personnel to interview prostitutes in the San Francisco  
17 safehouse.

18 MR. STRICKLAND: Then I misunderstood. I misheard  
19 your question.

20 THE WITNESS: Disregard what I said. I don't know  
21 too much about that.

22

1 BY MR. TURNER:

2 Q Please tell us what you know?

3 A Gittinger would know more. I know that some activity  
4 could come under that heading took place at the safe house.  
5 I don't know any more about it. I didn't monitor it, I was  
6 not there when it happened, I was not involved. Gittinger  
7 would have much better answers.

8 BY MR. TURNER:

9 Q Who else besides Gittinger was involved in that?

10 A It may have been one or two other people in the  
11 psychological group in TSD but I don't remember who they were.

12 Q Rhodes?

13 A I don't know. It could have been.

14 Q Did George White use prostitutes to test methods of  
15 slipping drugs to unwitting persons?

16 A I can only give you a general answer to that.  
17 To my knowledge, the involvement of prostitutes in the West  
18 Coast activity had to do with the MO, the modus operandi of  
19 this whole drug culture. They came in and out of it that way.  
20 I am sure some of his informants were prostitutes, some of his  
21 drug buys took place with their involvement.

22 What I am trying to say, aside from this thing you

1 eluded to before, I forget whether it was a study or some  
2 specific interest that Gittinger's group had in that, what  
3 I am trying to say to my knowledge, there was not a focus on  
4 prostitutes as a generic group of subjects but rather they  
5 were involved as they would be in the drug scene.

6 I don't know if that makes any sense to you.

7 Q There was a third safehouse in Marin County, would  
8 you, please, tell us what now about that safe house?

9 A I don't know much about that. I don't think I can  
10 help you much, except that it existed. As I remember, I found  
11 out, this took place when I was overseas and when I came back  
12 I found out they had conducted some work on the aerosol  
13 administration of LSD.

14 Q How did you find that out?

15 A I either read it in files or one of Gittinger's  
16 people related it to me.

17 Q This was when?

18 A '62 or '63.

19 Q What was your position at that time?

20 A I was either not in TSD or when I came back in TSD  
21 as their director of RUD. I was either working for Bissell  
22 or I came back to TSD as Research and Development Director.

1 Those dates may be off by a year or so.

2 Q George White knew he was working for the CIA, didn't  
3 he?

4 A Yes, he did.

5 Q Anslinger knew he was working for the CIA?

6 A Yes, he did.

7 Q Who else within the Bureau of Narcotics was witting  
8 of Mr. White's connection with the CIA?

9 A There were three other people but I don't remember  
10 now who they were.

11 MR. TURNER: Rather than begin on another line,  
12 I think --

13 THE WITNESS: You mean we have more on White, because  
14 I seem to be on a track where my memory is reasonably clear  
15 about that.

16 BY MR. TURNER:

17 Q We will do our best, there are other documents,  
18 other materials, I will, of course, come back.

19 What instructions did you give Mr. White as to  
20 the protections of experimental subjects that he was using  
21 in LSD tests?

22 A In the course of the period that I had to do, White,

1 he knew everything I knew about LSD. He was pretty much on his  
2 own. I didn't give him any instructions. He was only requested  
3 to report to us what happened after his LSD administration.

4 Q What instructions did Mr. Lashbrook give Mr. White  
5 as to the protection --

6 A I doubt whether he gave him any.

7 Q Of the subjects in the experiment?

8 A It is euphemistically called an "experiment". These  
9 were a series of more or less simulated, as far as we were  
10 concerned, operational uses and you could tell something from  
11 these data what would happen when someone got LSD and didn't  
12 know in a way the information we needed to know.

13 In those days, our focus was defensive primarily and  
14 we called these experiments, that is pushing the term quite  
15 a bit.

16 Q Did you ever witness such a simulated operational  
17 use?

18 A I didn't, no.

19 Q Did anyone from the institute?

20 A I think so.

21 Q You think so? Who?

22 A I don't remember who. Gittinger might have.



1 Q Lashbrook?

2 A Maybe, I am not sure. You have to ask them.

3 Q Did you visit the San Francisco and Marin County  
4 safe house?

5 A I think you asked me that and I said yes.

6 Q On how many occasions?

7 A Three.

8 Q What was the purpose of those visits?

9 A Sometimes I would be in San Francisco on some other  
10 business and I would drop in and talk to White about what he  
11 had been doing and what he needed in the safehouse.

12 Q Did you ever travel there expressly to visit the  
13 safe house?

14 A Yes, at least once in the early months.

15 Q What was the reason for that?

16 A Just to check out the place, look and what they were  
17 spending the money for.

18 Q Did you write a report based on that visit?

19 A I don't remember that that well.

20 Q When did the CIA's relationship with Mr. White  
21 terminate?

22 A I am not sure of this date, but it probably was

1     sometime like -- I am just not sure. I was going to say '63  
2     or so, but since I wasn't in CIA for that period of time,  
3     I am hazy on that point.

4             Q     What were the circumstances of your termination of  
5     that activity?

6             A     I am not sure I remember that except that we felt  
7     that we knew the answers to what we need to know as much as we  
8     can get them from that kind of an arrangement.

9             Q     There was an Inspector General survey of TSD which  
10    raised questions regarding the safehouse activity, what  
11    was the relationship of that to the termination of that  
12    activity?

13            A     I don't remember that being directly related to the  
14    termination.

15                    MR. TURNER: I think this is a good place to stop.  
16    I think I will be coming back to Mr. White. There is an  
17    extensive series of questions that I will need to go through  
18    which relate to the IG Report and the various other documents  
19    in that time frame.

20                    Thank you for your time.

21                    We are recessing this until 10:00 a.m., June 14,  
22    1983, in the morning at the same location.

1 (Whereupon, at 6:00 p.m., the deposition in the  
2 above-entitled matter recessed, to reconvene at 10:00 a.m.,  
3 June 14, 1983.)

4 I have read the foregoing pages  
5 238 through 416, inclusive, which  
6 contain a correct transcript of  
7 the answers given by me to the  
8 questions herein recorded.)

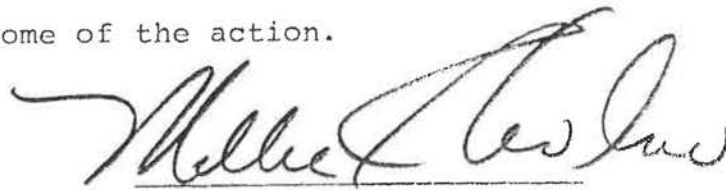
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Sidney Gottlieb

## CERTIFICATE OF SHORTHAND REPORTER

1  
2 I, Millie Ciolino, shorthand reporter, do hereby certify  
3 that the testimony of the witness appearing in the foregoing  
4 deposition at pages 238 through 416, inclusive, was taken by  
5 me in shorthand and thereafter reduced to typewriting by me;  
6 that said deposition at said pages is a true record of the  
7 testimony given by said witness; that I am neither counsel  
8 for, related to, nor employed by any of the parties to the  
9 action in which this deposition was taken; and further that I  
10 am not a relative or employee of any attorney or counsel  
11 employed by the parties thereto, nor financially or otherwise  
12 interested in the outcome of the action.

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June 6, 1983

Dr. Sidney Gottlieb  
Rural No. Box 301A  
Boston, Virginia 22713

ORLIKOW, et al., v. UNITED STATES  
Re: Deposition of Sidney Gottlieb

Dear Dr. Gottlieb:

On behalf of counsel who took your deposition on  
May 17, 1983 you are hereby notified that the transcript  
of your deposition is now ready and available at the above  
address for reading and signing as requested by you.

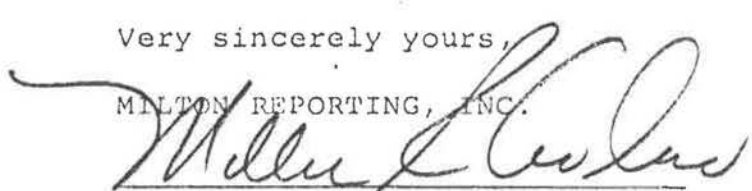
Kindly let the undersigned know when you will be in.

If it is not convenient for you to come to our offices, we  
would suggest you read counsel's carbon copy, prepare an errata  
sheet, sign the errata sheet before a notary public, return it  
to our office and we will attach it to the court copy of the  
transcript and proceed to file it with the court.

If by July 6, 1983 we have not received any request  
for extension of time or otherwise heard from you, it will be  
assumed that reading and signing are no longer desired, and the  
deposition will be filed.

Very sincerely yours,

MILTON REPORTING, INC.

  
Reporter/Notary

cc: Mr. Turner; Mr. Strickland  
file

