

1 Declaration of H. Dean Steward

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3 I, H. Dean Steward, having been duly sworn, declare:
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5 1. I am an attorney licensed to practice law in the states of
6 California and Hawaii. I have been an attorney since 1979.

7 2. I am a former Deputy Federal Public Defender for the Central
8 District of California. In that capacity, I began representation
9 of Daniel Ray Bennett in the Central District of California in
10 January of 1997. Mr. Bennett was charged in US v. Stanley, et.
11 al.

12 3. As part of my representation of Mr. Bennett, I began to
13 investigate Drug Enforcement Administration informant Andrew
14 Chambers. Over the last 4 years, I have continued to investigate
15 both Chambers and the DEA in their use of him. I have continued
16 both the investigation of Chambers and the representation of Mr.
17 Bennett, even though I left the Federal Public Defender Office
18 for private practice in April of 2000.

19 4. I have been sharing much of the information I uncovered with
20 other defense lawyers around the country. Specifically, I shared
21 much of the information I had on Chambers with attorney Howard
22 Bass of Minneapolis, Minnesota starting in December of 1999.

23 5. In February of 2001, I informed Mr. Bass that I had learned
24 of a 157 page internal DEA Report on Chambers, and I promised to
25 share the report with Mr. Bass if I could get it.

26 I then began efforts under the Freedom of Information Act to
27 secure a copy of the Report.

28 6. In May of 2001, I was able to secure a copy of the Report.

1 The copy I received from DEA is heavily redacted, and missing
2 several pages.

3 7. In August of 2001, I supplied a copy of the Report to Mr.
4 Bass. I believe that this Report is still not available to the
5 public.

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7 I declare under penalty of perjury that the foregoing is true
8 and correct.

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10 Dated: October 8, 2001



11 H. Dean Steward

12 California State Bar #85317

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