

AFFIDAVIT OF LORENZO LUCCA SANTURO

STATE OF TEXAS §

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COUNTY OF WEBB §

On this day, Lorenzo Lucca Santuro, appeared before me, the undersigned notary public and after I administered an oath to him/her, upon his/her oath, he/she said:

"My name is Lorenzo Lucca Santuro. I am over the age of 18 and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

Prior to November of 2005, my name was Victor Manuel Solomon. I had a legal name change in November 2005 because of the situation created by the KBR which occurred prior and following my firing: I was born in 1961 in Romania . I survived wars and revolution in the street to make it to the United States . I essentially escaped my country by swimming across the Danube River and walking across Europe . I was "black-listed" in my country and in Soviet Union . In August 1, 2005, on my very birthday, KBR fired me and gave me a ticket to Dubai , then Moscow , Frankfurt, Cincinnati , and Dallas . I was part of a group of expats, all US citizens, all KBR employees, returning home to the US . Our passports were taken away from us in Moscow airport by their intelligence service officials. My passport was the only one where the place of birth stated Bucharest-Romania. I was taken out of the group and questioned for about two hours by a Russian officer in a military uniform with the rank of a captain. He wanted to know why I am the only one American citizen in the group born in Romania , and why I was the only one without a DoD badge like everybody else. I did not have a DoD badge because I had been fired and it was confiscated by the KBR security personnel in Baghdad . My passport was photographed and I was finally released after I requested to contact the US Embassy in Moscow .

I was a KBR employee from June 2004 through August 2005. I was originally a truck driver for about 4 months. On one night, while performing my duties as a driver inside the base, I witnessed a Filipino girl being abducted to be taken to a group of drunk men that already "paid for her." I got involved, I called KBR Security and some other people from KBR Operations and together we rescued the girl. Because my initial involvement in this attempted rape case, the KBR Security manager, Mr. Bill Dickens recruited me and helped with my transfer from the Transportation Department to Security. The fact that I had military and law enforcement background in United States helped, and I was promoted to Corporated Security Technician for KBR security office.

I was in charge of the night shift from 1700 hours to 0500 hours daily during that entire period. As a security person for KBR, we were not empowered to do anything to prevent crime. There was not a procedure set by the KBR management to deal with law enforcement inside the base. It was a public knowledge among the KBR employees in country that there is no law in Iraq for the US civilian personnel. We were not under



UCMJ jurisdiction, so the US military didn't have authority over us, and KBR Security personnel didn't have the authority and the means to uphold any law, rule, or regulation. The only people who had authority over us were the KBR managers, but they were part of the problem rather than of the solution. In one instance I have caught a KBR employee stealing and breaking into vehicles inside the base, taken the person to the office, holding his identification, and reporting the incident in writing. The next morning, I was told by Mr. Dickens, my supervisor, that I "should have let him go."

In one instance I had a manager from Operations - Mr. Chuck Shepherd - reporting in writing that a lot of US military uniforms shipped from the US to Baghdad for the US servicemen are being stolen and sold at the black market inside and outside the base in Iraq. I personally consider this as a serious security threat for any Coalition personnel in Iraq. There were situations when terrorists impersonating US soldiers, dressed in US uniforms, penetrated our base security and inflicted casualties among us. When I took the report to my manager - Mr. Bill Dickens, he just threw it in the trash.

I witnessed criminal acts on a routine basis while I was in the Liberty Camp, Baghdad, Iraq. I have seen sexual harassment and assaults. I have personally been assaulted by American citizens with knives and clubs. I reported in writing to HR a situation when out of the blue sky a KBR employee threw a big metal flashlight on my head just for the fact that he didn't like KBR Security people in general and I just happened to be there in the wrong place in the wrong time. KBR HR read my complaint and told me: "What you want me to do now? To send him home just for that?" so no action was taken against the assailant - not there in this case, and not in so many other instances where people got physically assaulted, or aggressively harassed, or really hurt. The order of the day was that all those "minor negative aspects" to be swept under the rug, so that the KBR image to remain good. After all, we were all heroes, contributing to the fight against terrorism. I have problems with Third Country Nationals or with Iraqi Nationals in regular bases, but the only ones that I had to be very careful because they could hurt me physically were the ex-pats, all US employees.

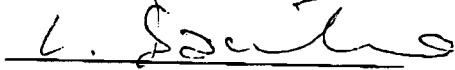
I have seen people beaten by the "redneck mafia," who were a group of KBR employees recruited from somewhere in Louisiana (I believe it was called Leesville). The project manager in the period of time I was there was from that location, as I heard. These were all Caucasian people and they didn't like anybody that was different. I am white myself, but I witnessed numerous cases of discrimination against black or Latino employees. As an example, Ron Chavez (Latino) was reporting on the lack of security at the Baghdad International Airport (BIAP). I was in R&R at that very time, but I was told that the management gave him the hint that he was going to get hurt if he did not withdraw the report. He did not believe this. Then, in one night, he was set up for an ambush inside our own base, lured in a tent where several KBR employees beat him and left him half dead on the ground. He needed to be medevaced by air and later on flown to a military hospital in Germany as a result of his severe beating. As far as I know, even if the names of the assailants are known, nobody was ever prosecuted for this assault. This incident and numerous others inside KBR confirmed the fact that there was no law, no repercussions for crimes committed by any KBR employee.

The word was among us, at Camp Liberty in year 2004-2005, that if you were not a

I had also reported all of these incidents to Human Resources. Two months later Mr. Bill Dickens, who fired me as a retaliation. I was told in one evening at 1700 hrs that I am terminated, some HR representative that I have never met before even if I knew everybody inside the base read me my termination papers with no right to appeal, I was then confined to my room with guards at the door and eventually I was escorted under KBR security guard to the Baghdad airport, all the way to the plane. Once I arrived in Dubai, at the hotel rented by KBR I had another KBR security escort that followed me everywhere, including at the bathroom inside the hotel lobby, and then again, all the way to the Dubai airport, to the plane, bound for Moscow.

I am currently a Commercial Vehicle Inspector for the Texas Department of Public Safety, and I was offered a conditional job as a State Trooper cadet at the DPS Police Academy, and ordered to report for duty at the academy on the 29th of this month.”

Further affiant sayeth not.



Lorenzo Lucco Santuro, AFFIANT

sworn to and subscribed before me on the day of January, 2008

notary public in and for the state of texas

(seal)