

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA**

- Alexandria Division -

**IN RE: BLACKWATER
ALIEN TORT CLAIMS ACT
LITIGATION**

**Case No. 1:09-cv-615
Case No. 1:09-cv-616
Case No. 1:09-cv-617
Case No. 1:09-cv-618
Case No. 1:09-cv-645
(consolidated for pretrial purposes) (TSE/IDD)**


DECLARATION OF SUSAN L. BURKE

I hereby declare to the following under penalty of perjury:

1. I have been practicing as an attorney since 1987. My professional affiliations have included, among others, Covington & Burling, the Department of Justice, and a corporate law department for a publicly-traded hospital company. In 2005, I formed Burke O'Neil LLC, a small litigation boutique representing both corporate defendants and individual plaintiffs.
2. In my role as defense counsel, I have had occasion to interview and retain crisis management organizations. As part of those efforts, in 2003 or 2004, my colleagues and I interviewed John Webber, a principal with the organization now known as Dezenhall Resources. Mr. Webber was my neighbor in Arlington, Virginia, which is how his company first came to my attention.

3. Through that interviewing process, I learned quite a bit about Dezenhall Resources. The organization specializes in shaping public opinion, or as they describe it, “driving the public narrative,” for companies in trouble.
4. According to statements made during the interview, one of the techniques Dezenhall Resources uses to shape public opinion is the wholesale creation of an artificial “grass roots” movement. The company pays various persons to hold themselves out to the public as independent voices. These persons write letters to editors, engage in discussion groups, and otherwise press their views in public fora. This service is touted by Dezenhall Resources as quite effective, albeit expensive.
5. I have not retained Dezenhall Resources for any matters. Thus, my knowledge about their means of operation is limited to the information learned from their public statements and the statements made during the interview.
6. In October 2007, Burke O’Neil filed suit on behalf of the victims of the Nissor Square massacre. Shortly after we filed suit, my law partner William O’Neil received an unsolicited email from an acquaintance who worked or had worked for Dezenhall. This person alerted us that Erik Prince and Blackwater had retained the company now known as Dezenhall Resources.
7. We do not know the full extent of the relationship between Dezenhall Resources and Erik Prince. We do not know whether that relationship continues to date. We have served discovery that should elicit that information.

Executed on July 31, 2009



Susan L. Burke