

6. During the months that I was living at the LSF Advisor Building, I was shocked 4 or 5 times in the shower – the same shower where Staff Sergeant Ryan Maseth was electrocuted.

7. On at least one of these occasions, I had to use a wooden handle to turn off the shower nozzle because the electrical current was so strong.

8. On one of these occasions, I was shocked by the metal hose attached to the shower handle.

9. In each instance, I had been in the shower a short period of time and then was shocked during the course of the shower.

10. In addition to being shocked in the shower, I was shocked by the water while shaving at the bathroom sink at least once and possibly twice.

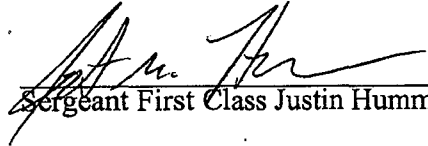
11. On each occasion when I was shocked, my roommate, Matthew Newsom, also a Special Forces soldier living at the LSF Advisor Building, wrote up and submitted a work order indicating that I was shocked in the shower and/or at the sink while shaving.

12. In response to each work order, personnel from Kellogg Brown & Root (“KBR”) showed up with the work order to the LSF Advisor Building and attempted to fix the electrical current hazard in my shower and sink.

13. I know that KBR visited the roof of the LSF Advisor Building to inspect the water pump.

14. On another occasion, KBR replaced the heating coil on my water tank and/or the water tank itself.

I declare under penalty of perjury, and consistent with the provisions of 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on June 6, 2008.


Sergeant First Class Justin Hummer