

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, THE LAW OFFICES  
OF STEVEN R. DONZIGER; et al.,

Defendants.

Case No. 11-CV-0691 (LAK)

---

**DECLARATION OF DENIS COLLINS IN SUPPORT OF  
MOTION FOR STAY AND PROCEDURAL SAFEGUARDS**

---

I, DENIS COLLINS, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am currently a self-employed private investigator and a retired Special Agent of the FBI. I respectfully submit this Declaration in support of defendants Steven Donziger et al.'s Motion for a Stay and Procedural Safeguards. I have personal knowledge of the facts stated in this Declaration and if ordered by the court to testify I would testify truthfully to these facts.

2. From 1973 to 2000, I was a special agent for the FBI, assigned to the New York City Division for 26 years. As part of my duties, I was assigned to a squad that conducted surveillances in criminal and national security matters fulltime. I estimate that I participated in over 2000 surveillance operations over the course of my FBI career.

3. Since 2012 I have been a self-employed New York State licensed private investigator. I am retained to perform a variety of tasks, including many different types of surveillance. As a private investigator, I have been retained at least 10 times to conduct surveillance activities.

4. In January 2012, Steven Donziger retained my services because he believed that several unknown individuals had been following him and that he had been under continuous surveillance on a 24/7 basis in Manhattan, where he was living. He asked me to assess the situation to determine if his supposition was true.

5. On January 30, 2012, I drove to the vicinity of West 77 Street and Amsterdam Avenue, New York, NY, where Mr. Donziger was currently located. Based on my extensive experience in surveillance, I identified three vehicles parked in proximity to the location where Mr. Donziger was currently located. I determined that these vehicles were potentially set up to

conduct surveillance of the building where Mr. Donziger was located. There were two individuals in one vehicle, and the other two vehicles were occupied by one individual.

6. While sitting in my car, I called Mr. Donziger and asked him to walk outside to the street to hail a taxi. Mr. Donziger hailed a taxi northbound on Broadway. When the taxi drove off, each of the three vehicles followed him in the taxi to his residence.

7. Later that evening, Mr. Donziger left his residence and entered a taxi. The three previously identified vehicles followed Mr. Donziger's taxi. I discreetly followed the three vehicles in my car. When Mr. Donziger exited the taxi at Columbus and 69th Street he walked into a restaurant. The three vehicles pulled over in the area and one of the individuals in those cars exited and walked towards the restaurant where Mr. Donziger was located. Two hours later, when Mr. Donziger left the restaurant in a taxi, the three cars followed him to his residence and then took up positions on the street after Mr. Donziger entered his building.

8. Based on my more than 20 years of experience as an expert in surveillance, both at the FBI and as a private investigator, it is my opinion that Mr. Donziger was being surveilled on the evening of Monday, January 30, 2012.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st. day of May, 2013 at New York, New York.

By: Denis Collins  
DENIS COLLINS