

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

CASE NO: 8:05-Cr-475-T-27TGW

THOMAS SPELLISSY

and

STRATEGIC DEFENSE INTERNATIONAL, INC.

AFFIDAVIT

I, Donald C. Allgrove under oath, depose and say:

1. I am familiar with matters pertaining to the investigation of Colonel (Retired) Tom Spellissy and his company, Strategic Defense International, Inc (SDI) and I also know Mr. William Burke.
2. I was an U.S. Army Lieutenant Colonel assigned to the United States Special Operations Command from October, 1998 to May, 2002. I worked on both classified and unclassified programs. I also worked on Foreign Comparative Test Programs as the USER (Soldier/SEAL) representative with Mr. Burke. The priorities for acquisition program funding are determined by the USERS in the field not by the staff at USSOCOM. The USER priorities are consolidated at USSOCOM and approved by the USSOCOM Board of Directors. The staff agency at USSOCOM responsible for maintaining the priority list is the Assessment Directorate. The only staff agency at USSOCOM who can change a priority is the USSOCOM Board of Directors. Mr. Burke had no role in determining priorities and there is no way possible that he could change the priorities.
3. I will testify that Mr. Burke cannot give any preferential treatment to Colonel Spellissy or to his clients because Mr. Burke was in no position and had no authority to do so. Simply stated, priorities for acquisition funding come from the units and the units decide what will be tested and procured in coordination with the Program Manager not Mr. Burke.

4. I will also testify that Contractors at USSOCOM do not perform government functions. A contractor can perform a government function if they are on specific orders to do so. Burke did not have this authority. I would also testify that Bill Burke cannot change any USSOCOM priorities because he has no decision making authority. USSOCOM priorities are determined by the users in the field.

Donald C. Allgrove
Lieutenant Colonel (Retired) Donald C. Allgrove

STATE OF Florida
COUNTY OF Pinellas

Sworn to or affirmed and signed before me on 1/23/2009 by Lt. Col (Ret.) D.C. Allgrove



Jennifer Martinotti
NOTARY PUBLIC - STATE OF
Florida
[Print, type, or stamp commissioned name of notary.]

X Personally known
Produced identification
Type of identification produced Valid military ID

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