

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS BAY  
TRANSPORTATION AUTHORITY

Plaintiff

v.

Civil Action No. \_\_\_\_\_

ZACK ANDERSON, RJ RYAN,  
ALESSANDRO CHIESA, RONALD L.  
RIVEST, MASSACHUSETTS INSTITUTE  
OF TECHNOLOGY, SUSAN HOCKFIELD,  
PHILLIP L. CLAY, and the MIT  
CORPORATION

Defendants

**DECLARATION OF RICHARD SULLIVAN**

1. I am a Sergeant Detective in the Transit Police of the plaintiff, Massachusetts Bay Transportation Authority ("MBTA"). I am the Transit Police liaison to the Federal Bureau of Investigation (the "FBI").

2. I have held this position since April 2002.

3. I make this declaration based on my personal knowledge.

4. Some time after July 30, 2008, I was informed that the MBTA had learned of statements, purportedly made by the defendants Zack Anderson, RJ Ryan, and Alessandro Chiesa (the "MIT Undergrads"), that related to the security of fare media used on the MBTA transit system.

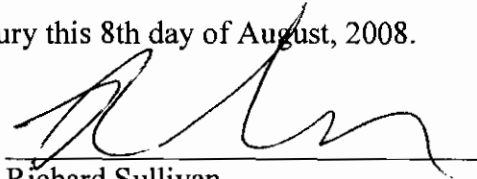
5. I worked with the MIT Professor Ron Rivest and the FBI to arrange a meeting with the MIT Undergrads to discuss the issues.



6. This meeting took place on August 5, 2008 at MIT. I attended the meeting with a local FBI agent, Jacob Shaver.

7. This meeting was attended by the MIT Undergrads, with the exception of Alessandro Chiesa, by their Professor, Ron Rivest, and by an individual, Jay Wilcox, who identified himself as MIT counsel.

Signed under the penalties of perjury this 8th day of August, 2008.



Richard Sullivan  
MBTA Transit Police

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