

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,

Plaintiffs,

v.

Case No. 1:04-cv-814-RCL

CENTRAL INTELLIGENCE AGENCY,

Defendant.

**SUPPLEMENTAL DECLARATION OF VANNA BLAINE, INFORMATION REVIEW
OFFICER FOR THE LITIGATION INFORMATION REVIEW OFFICE,
CENTRAL INTELLIGENCE AGENCY**

I, VANNA BLAINE, hereby declare and state:

I. INTRODUCTION

1. I currently serve as the Information Review Officer ("IRO") for the Litigation Information Review Office ("LIRO") at the Central Intelligence Agency ("CIA" or "Agency"). I have held this position since February 2020.

2. I respectfully refer the court to my previous Declaration for a detailed description of my professional experience.

3. Through the exercise of my official duties, I have become familiar with this civil action and the underlying FOIA requests. I make

the following statements based upon my personal knowledge and information made available to me in my official capacity.

II. PURPOSE OF THIS DECLARATION

4. The purpose of this declaration is to further clarify the CIA's search of its operational records.

5. On August 2, 2019, this Court ordered the CIA to "review its operational files and explain with specificity whether any additional responsive records exist and, if so, why they must be exempt from FOIA." ECF 340.

6. On August 30, 2019, the CIA filed a Motion to Reconsider in response to the Court's August 2019 order to search its operational files. ECF 342.

7. On March 31, 2020, the Court denied the CIA's Motion to Reconsider. ECF 345. Following the Court's March 31, 2020 order, the CIA began the process of searching its operational files.

8. On October 30, 2020, the CIA reported to the Court the search was complete and no responsive records were located.

9. On December 21, 2021 the CIA filed a Motion for Summary Judgment along with a Declaration detailing the CIA's operational file search.

III. ADEQUACY OF THE SEARCH

1. Given the CIA's national security mandate, specific information about Agency databases and exactly how these repositories are structured and searched cannot be described in great detail on the public record. However, I can say that the CIA searched centralized


internal databases containing Agency-wide operational files, including cables, intelligence reports and other records. Aged operational files, originally maintained in hard copy form, were digitized and made a part of these databases. Any database where operational files related to Plaintiff's request could reasonably have been located were searched in the course of this review.

2. The search terms the CIA provided in the December 21, 2021 Declaration ("POWs," "prisoners of war," "MIA," "missing in action," "Vietnam," "task force," "House Special POW," "image,") were a selection of those used for the search of operational files. Keyword searches were calculated to retrieve from the database records that contained those terms as well as variants of those terms. The search method did not include more precise or narrowed terms because utilizing more specific search terms would not have necessarily been effective in identifying documents potentially responsive to Plaintiffs' request, and may have inadvertently excluded otherwise responsive documents that failed to contain the more specific search terms. Out of an abundance of caution, a broad search method was employed to properly capture all documents potentially responsive to Plaintiffs' request.

* * *

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of May 2022.



Vanna Blaine
Information Review Officer
Litigation Information Review Office
Central Intelligence Agency

