

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE  
AGENCY,

Defendant

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C. A. No. 04-0814 (RCL)

DECLARATION OF PAUL DELL

I, Paul Dell, declare and say as follows:

1. I have been employed for 20 years building and maintaining both personal and small business computer systems. I have worked in the digital signage industry as a trouble shooter in the field for the purpose of defining and correcting networking issues with clients' security servers. I currently work as an information technology consultant.

2. I graduated from high school before I was 16, then took a job at the University City Science Center in Philadelphia operating and maintaining an optical scanning system at a time when the city still used card readers and tape decks. An IBM 360 housed in that building with the sole computer being used in the Philadelphia area. I built my first computer back when we

had to order parts from the Tandy Electronics Catalogue. I learned DOS from a library book and Windows by becoming fascinated by the graphical user interface. I've attended courses in specific software to learn computer automated drafting or CAD. I was trained by the Omnivex Corporation on their digital signage software. I have trained others on various Microsoft platforms and conducted a business level seminar, acquainting people in the digital signage business with assembling computers from scratch so they might better understand our company's suggestion to use certain specifications.

3. Upon review of the Declaration of Martha M. Lutz ("Lutz Decl.") filed in Civil Action No. 04-0814, I was surprised by her depiction of the Central Intelligence Agency's CADRE system as being a costly, man-hour intensive system. This is at odds with my understanding of CADRE as a cutting edge file maintenance solution adopted by the Agency in its quest to help eliminate the handling and reprocessing of sometimes fragile hard copy documents. Ms. Lutz would have us believe it could take months and countless man-hours to provide declassified documents which had been previously released in hard copy form. This is not the case.


4. Lutz claims that "the Agency does not have the capability or capacity to readily produce records requested under the FOIA, the Privacy

Act, and the Mandatory Declassification Review Program in an unclassified electronic format.” Lutz Decl., ¶ 5. However, any document released via the CADRE system must be initially converted from hard copy (if indeed stored in that fashion) to a digital form in order to accommodate both the review and printing process prior to release. The conversion of any electronic format to a suitable word searchable platform would be swift and much less expensive than reproducing the information in the form of hard copy documents. Thus, Ms. Lutz’s claim that the information sought by plaintiff Roger Hall in this case is not “readily reproducible” is either disingenuous or based on ignorance of computer signage capabilities. It is not based on fact.

5. The idea of the Agency’s secure METADATA being at risk due to release of documents in an electronic format is anathema to the concept of CADRE itself. Such METADATA could only be available in a given release if left intact purposely by those agents responsible for vetting the documents. Generally, a document’s metadata will contain an access date, name, size and file format pertinent to that document. Such information is normally used by word processing software to file, identify and retrieve a document.

6. The fact that vetted, declassified versions of the documents requested had been released for an earlier printing indicates that electronic versions must have existed. Although reproduction may have been accomplished in a completely manual fashion, to do so would have required an unreasonable amount of effort when the sophistication of their CADRE system is readily available to ease task. In other words, if the Agency is actually photocopying or typing out the documents, it has created a cumbersome and very expensive step, one that is unnecessary to provide Mr. Hall with the records he has requested in a word searchable electronic format.

I hereby declare that the foregoing is true and correct. Executed this 20<sup>th</sup> day of August, 2013.

  
Paul Dell 8/20/2013