

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JOHN EAKIN,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 5:16-CV-972
)	
UNITED STATES)	
DEPARTMENT OF DEFENSE,)	
)	
Defendant.)	
)	

DECLARATION OF CHERYL M. HOLM

I, Cheryl M. Holm, pursuant to 28 U.S.C. § 1746, declare as follows:

1. The statements contained in this declaration are based on my personal knowledge and Department of Defense (DoD) records and information made available to me in my official capacity.
2. I am currently the Chief Data Officer for the Defense POW/MIA Accounting Agency (DPAA or “the Agency”). I have served in my current position since April 2021. As the Chief Data Officer for DPAA, I am responsible for data governance, leading data consolidation, establishing authoritative data, implementing the Agency case management system, and supporting the Agency’s mission to provide data to families, mission partners, and the general public.

DPAA's Mission

3. DPAA is the Defense Agency responsible for accounting for missing DoD personnel by locating, recovering, and identifying missing DoD personnel from designated past conflicts, including:

World War II beginning December 7, 1941, and ending on December 31, 1946;

Cold War beginning September 2, 1945, and ending on August 21, 1991;

Korean War beginning June 27, 1950, and ending on January 31, 1955;

Indochina War (Vietnam War), beginning July 8, 1959, and ending on May 15, 1975;

Operation El Dorado Canyon, April 15, 1986;

Persian Gulf War, beginning August 2, 1990, and ending on February 28, 1991;

Iraq Campaign, beginning March 18, 2003, and ending on December 31, 2011; and

Any other conflict designated by the Secretary of Defense, pursuant to 10 U.S.C. § 1509.

4. DPAA is also responsible for providing the primary next of kin and family members the available information concerning the loss incident, past and present search and recovery efforts of the remains, and current accounting status of unaccounted for DoD personnel.

5. To facilitate DPAA's mission to account for missing DoD personnel and communicate its efforts to the family members, and pursuant to 10 U.S.C. § 1509(d), DPAA is in the process of developing personnel files and a centralized database that contains all available historical information related to missing DoD personnel. This is a massive undertaking, and requires DPAA to obtain hundreds of millions of documents from private and public sources, create high-quality images of the historical documents, and link those documents in the centralized database to known individual case losses by conflict.

Individual Deceased Personnel Files

6. Independent of the above-referenced litigation, DPAA is currently engaged in an effort to obtain Individual Deceased Personnel Files (IDPFs) from multiple sources to create a definitive list of IDPFs associated with individual case losses by conflict, including World War II (WWII). This effort has been ongoing for many years and involves obtaining digital copies of the IDPFs from multiple sources using various naming conventions and ingesting them into a system called Documentum so that the IDPFs can be validated and appropriately linked to individual case losses by conflict (e.g., WWII).

7. The validation is a slow and deliberate process that requires many layers of effort. DPAA has created a coding script that allows for the validation of the file upon ingest to the database; however, the script is only successful if the naming convention used for the digital files matches with the individual case loss. Minor inconsistencies like additional spaces in the file name, the addition of an underscore to the file name, or transposed letters will prevent automated validation. If the automated process fails, DPAA initiates what is commonly referred to as a “fuzzy comparison.” The fuzzy comparison is conducted by using an automated process to compare only certain distinguishable characteristics of a file name, like the service number. When the fuzzy comparison results in a potential match, then DPAA personnel must manually compare the digital file to confirm the match to the individual case loss. Finally, if the fuzzy comparison does not result in a match, the last step is to do a review and validation that requires an individual user to view the digital IDPF for comparison to individual case loss.

8. There have been several notable challenges with creating a definitive list of IDPFs associated with individual case losses, including the existence of multiple versions of IDPFs associated with a single case loss, misfiled IDPFs, missing IDPFs, IDPFs comingled across

conflicts and mixed with non-conflict related Service member deaths, and the poor condition of records from the 1940s.

9. This project is ongoing and will not be complete for a number of years. Given the example of challenges noted above, it is not currently possible to produce an exact number of known IDPFs within the Department of Defense.

E, H, and L WWII IDPFs

10. I was made aware of potential omissions in the number of World War II IDPFs for Service members with last names beginning with an E, H, and L that were produced to the Plaintiff in the above-captioned case.

11. A comparison was conducted of the list of files maintained by the U.S. Attorney's Office that were produced to the Plaintiff in this case with the list of files maintained by DPAA of IDPFs that were converted to searchable portable document format (.pdfs), as required by the Court, for production to the Plaintiff. The comparison was challenging given the differing naming conventions used in the production process; however, the analysis showed a difference of approximately 23,618 IDPFs, of which 3,851 were from letter group E, 19,450 were from letter group H, and 317 were from letter group L.

12. DPAA has already begun transferring the identified E, H, and L WWII IDPFs from a DPAA server to an external hard drive for transmission to Army Human Resources Command (AHRC) for review and release the Department of Justice and the Plaintiff. These files were previously converted to searchable .pdfs for the sole purpose of production to the Plaintiff.

13. Going forward, DPAA is committed to working with AHRC to ensure ongoing communications when files are turned over to AHRC and will produce a master list of IDPFs to

validate the shipment of files to AHRC.

14. DPAA is also committed to working with AHRC and providing data available to DPAA to determine if there were any issues with the prior production of E, H, and L files to Plaintiff, and if so, to take reasonable steps to ensure similar issues do not occur moving forward.

Validation of A-L IDPFs

15. Following production of the E, H and L WWII IDPFs, DPAA will work with AHRC to compare the list of WWII IDPFs with last names beginning with A-L that were provided to the Plaintiff in this case to the digital files DPAA currently has in its possession.

16. DPAA will note any differences between the list of files provided to the Plaintiff in this case and the DPAA WWII IDPFs and will provide any IDPFs to the ARHC for prompt review consistent with the process for transferring the E, H and L IDPFs identified above.

Identification and Transfer of M-Z WWII IDPFs

17. DPAA has begun the process of identifying all digital IDPFs in its possession for WWII Service members with last names beginning with M-Z. DPAA has already converted 88,449 IDPFs into searchable .pdfs, and we are working to have the remaining files converted as quickly as possible.

18. The time required to convert images into text through the optical character recognition process (OCR) process is determined by a number of different variables, including OCR software utilized, image complexity and quality, and the number of dedicated resources. On average, a low complexity, good quality document takes approximately 4-8 seconds per page to process. The average IDPF is 50 pages, so a complete run of the process for character recognition can require multiple workdays.

Master List of WWII IDPFs

19. As described above, DPAA is currently working on a multi-year deliberate process to validate and link IDPFs in its possession to ensure DPAA has a digital version of each so that information can be used to assist in locating, recovering and identifying missing DoD personnel and communicating DPAA's efforts to account for the missing DoD personnel to their families.

20. Given the data currently available, DPAA is able to produce a by-name list of individual case losses, and identify which case losses currently have an IDPFs associated with it. The list of individual case losses was produced by using information obtained from historical documents, including the rosters of the dead and rosters from the American Battle Monuments Commission. Once this list of individual case losses was created, DPAA has been working through the validation process described above to associate IDPFs with individual case losses. This list is the result of this ongoing effort. At this stage of the project, we know there are gaps in the data because the validation process is ongoing with tens of thousands of IDPFs still being validated and linked to individual case losses, but the list provided is the best list currently available of known IDPFs. Additionally, the list doesn't account for some individual case losses having multiple versions of IDPFs.

* * * * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of September 2021.

Handwritten signature of Cheryl M. Holm in cursive script.

CHERYL M. HOLM

Chief Data Officer

Defense POW/MIA Accounting Agency

