

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 involves obtaining digital copies of the IDPFs from multiple sources using various naming conventions and ingesting them into a Case Management System (CMS) so that the IDPFs can be validated and appropriately linked to individual case losses by conflict (e.g., WWII). CMS is DPAA's system of record for all IDPFs and contains available information about individual case losses, including the Service member's name, Service branch, associated conflict (e.g., WWII), and other pertinent data.

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. The list of individual case losses was produced 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.

9. At the time DPAA processed the request, DPAA extracted all known and validated WWII IDPFs from the Case Management System (CMS). This was done by creating a query against the CMS to generate a list of names of WWII individual case losses with a IDPF in the applicable letter group (e.g., M-Z). Once the list of names was generated, a computer script was written to isolate and extract IDPF files for each of the names on that list. Because it is not technically possible to extract files directly from the CMS to the network files system, the extracted files were exported from the CMS to a secure Amazon Web Service S3 Bucket (S3 Bucket) in DPAA's production environment. Then the files were copied from the S3 Bucket to the DPAA's network file system so that an Optical Character Recognition (OCR) function could be run on the files to make the documents searchable.

10. All identified WWII IDPFs identified through the process above were sent to U.S. Army Human Resource Command for review.

\* \* \* \*

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

Executed this 27th day of September 2023.

HOLM.CHERYL.M  
U.1268142599

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CHERYL M. HOLM  
Chief Data Officer  
Defense POW/MIA Accounting Agency