

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

JOHN A. PATTERSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 5:17-CV-00467
)	
DEFENSE POW/MIA ACCOUNTING)	
AGENCY, et al.,)	
)	
Defendants.)	

CERTIFICATION OF ADMINISTRATIVE RECORD

I, Lisiane M.Y. Valentine, declare as follows:

1. I am the Program Manager for Casualty, Mortuary Affairs, and Military Funeral Honors at the Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy.

2. I have served in the above-described capacity since April 23, 2012. My present responsibilities include casualty, mortuary affairs, military funeral honors, cemetery management, and personnel accountability. I represent the Office of the Secretary of Defense in the review, development, and coordination of all relevant policies to ensure that they address the sensitivities of the policy areas and reflect the priorities of the Department of Defense. I manage special events and high-level meetings such as the Department of Defense Casualty Advisory Board, Central Joint Mortuary Affairs Board, and the Cemetery Management Board. I also serve as the DoD Program Manager for the Gold Star Advocate Program ensuring family members' issues are resolved.

3. In my current role as the OSD program manager, My office also maintains the

official records for disinterment decisions made pursuant to DTM-16-003.

4. The facts attested to herein are based upon my personal knowledge or information made available to me in the course of my official duties.

5. I certify the administrative record for the June 29, 2018 decision of the Assistant Secretary of Defense for Manpower and Reserve Affairs to approve disinterment of eight graves associated with Cabanatuan Common Grave 704, which are a subject of this litigation. To the best of my knowledge, the following documents, together with the documents cited therein, constitute all non-privileged documents underlying that decision.

#	Document Title	Bates Number
1	Action Memorandum, Disinterment Recommendation for Common Grave 704, Cabanatuan Camp #1 (June 25, 2018)	DPAA0004316-DPAA0004317
2	Tab A – Memorandum from Assistant Secretary of Defense for Manpower and Reserve Affairs, Disinterment Requests for Common Grave 704, Cabanatuan Camp #1 Cemetery (June 29, 2018)	DPAA0004318-DPAA0004319
3	Tab B – Memorandum from DPAA Director, Disinterment Recommendation for Cabanatuan Common Grave 704 (Mar. 2, 2018)	DPAA0004320
4	Tab C – Memorandum from U.S. Army Resources Command, Review of Disinterment for Common Grave 704, World War II, Manila American Cemetery and Memorial, Philippines (Dec. 19, 2017)	DPAA0004321
5	Tab D – Memorandum from Deputy Assistant Secretary of the Navy (Military Manpower & Personnel), Proposed Disinterment Recommendation for Cabanatuan Common Grave 704 (Feb. 12, 2018)	DPAA0004325

#	Document Title	Bates Number
6	Tab E – Under Secretary of Defense, Directive-type Memorandum (DTM)-16-003 – “Policy Guidance for Disinterment of Unidentified Human Remains” (May 5, 2016, amended June 15, 2017)	DPAA0004326-DPAA0004337
7	Tab F – DPAA Memorandum for Record, Disinterment of Eight Unknowns Associated with Common Grave 704 Cabanatuan Camp #1 Cemetery (Nov. 28, 2017)	DPAA0004338-DPAA0004345
8	Tab G – Memorandum from Armed Forces Medical Examiner System, Family Reference Samples (FRS) for Disinterment of Eight Unknowns Associated with Common Grave 704 Cabanatuan WWII (Jan. 3, 2018)	DPAA00043346-DPAA0004347
9	ABMC, Memorandum to Office of the Assistant Secretary of Defense (July 6, 2018)	DPAA0004315

6. I certify the administrative record for the June 29, 2018 decision of the Assistant Secretary of Defense for Manpower and Reserve Affairs to approve disinterment of four graves associated with Cabanatuan Common Grave 822, which are a subject of this litigation. To the best of my knowledge, the following documents, together with the documents cited therein, constitute all non-privileged documents underlying that decision.

#	Document Title	Bates Number
1	Action Memorandum, Disinterment Recommendation for Common Grave 822, Cabanatuan Camp #1 (July 24, 2018)	DPAA0004349-DPAA0004350
2	Tab A – Memorandum from Assistant Secretary of Defense for Manpower and Reserve Affairs, Disinterment Requests for Common Grave 822, Cabanatuan Camp #1 Cemetery (Aug. 6, 2018)	DPAA0004351-DPAA0004352
3	Tab B – Memorandum from DPAA Director, Disinterment Recommendation for Cabanatuan Common Grave 822 (Jan. 18, 2018)	DPAA0004353

#	Document Title	Bates Number
4	Tab C – Memorandum from U.S. Army Resources Command, Review of Disinterment for Common Grave 822, World War II, Manila American Cemetery and Memorial, Philippines (undated)	DPAA0004354-DPAA0004357
6	Tab D – Under Secretary of Defense, Directive-type Memorandum (DTM)-16-003 – “Policy Guidance for Disinterment of Unidentified Human Remains” (May 5, 2016, amended June 15, 2017)	DPAA0004358-DPAA0004369
7	Tab E – DPAA Memorandum for Record, Disinterment of Four Unknowns Associated with Common Grave 822 Cabanatuan Camp #1 Cemetery (Nov. 28, 2017)	DPAA0004370-DPAA0004377
8	Tab F – Memorandum from Armed Forces Medical Examiner System, Family Reference Samples (FRS) for Disinterment of Four Unknowns Associated with Common Grave 822 Cabanatuan WWII (Jan. 8, 2018)	DPAA0004378-DPAA0004379
9	ABMC, Memorandum to Office of the Assistant Secretary of Defense (July 9, 2018)	DPAA0004348

7. I certify the administrative record for the November 28, 2018 decision of the Assistant Secretary of Defense for Manpower and Reserve Affairs on Janis Fort’s request to disinter X-618 Leyte #1 for comparison to Brigadier General Guy O. Fort, which is a subject of this litigation. To the best of my knowledge, the following documents, together with the documents cited therein, constitute all non-privileged documents underlying that decision.

#	Document Title	Bates Number
1	Action Memorandum, Disinterment Recommendation for Unknown X-618 and X-619 Leyte (Nov. 20, 2018)	DPAA0004446-DPAA0004447
2	Tab A – Memorandum from Assistant Secretary of Defense for Manpower and Reserve Affairs, Disinterment Requests for Unknowns X-618 and X-619 Leyte (Nov. 28, 2018)	DPAA0004448

#	Document Title	Bates Number
3	Tab B – Memorandum from DPAA Director, Disinterment Recommendation for Unknown X-618 Leyte #1 and Unknown X-619 Leyte #2 (Aug. 14, 2018)	DPAA0004449
4	Tab C – Memorandum from U.S. Army Resources Command, Review of Disinterment for Unknowns X-618 and X-619 Leyte #1, Manila American Cemetery and Memorial, Philippines (May 15, 2018)	DPAA0004450
5	Tab D – Memorandum from U.S. Army Resources Command, Family Request for Disinterment (Dec. 19, 2017)	DPAA0004451-DPAA0004456
6	Tab E – Under Secretary of Defense, Directive-type Memorandum (DTM)-16-003 – “Policy Guidance for Disinterment of Unidentified Human Remains” (May 5, 2016, amended July 10, 2018)	DPAA0004457-DPAA0004468
7	Tab F – DPAA Memorandum for Record, Family Disinterment Request for Unknown X-618 Leyte #1 and Unknown X-619 Leyte #1, The Philippines (Aug. 6, 2018)	DPAA0004469-DPAA0004486

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

Executed this 4th day of June, 2019, in San Antonio, TX.

VALENTINE.LISIANE.132833172
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VALENTINE.LISIANE.MARGARET.1
132833172
Date: 2019.06.04 15:28:50 -04'00'

Lisiane M.Y. Valentine
Program Manager, Casualty, Mortuary Affairs,
and Military Funeral Honors
Department of Defense