

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. Pursuant to my current role as the OSD program manager on disinterments, my

office maintains the official records for disinterment decisions made pursuant to Directive-type Memorandum (DTM)-16-003, “Policy Guidance for Disinterment of Unidentified Human Remains.”

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 21, 2019 decision of the Assistant Secretary of Defense for Manpower and Reserve Affairs on John Boyt’s request to disinter X-3629 Manila #2 for comparison to Colonel Loren P. Stewart, 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-3629 Manila #2 (June 18, 2019)	DPAA0006920-DPAA0006921
2	Tab A – Memorandum from Assistant Secretary of Defense for Manpower and Reserve Affairs, Disinterment Recommendation for Unknown X-3629 Manila #2 (June 21, 2019)	DPAA0006922
3	Tab B – Memorandum from DPAA Director, Request for Disinterment of World War II Unknown X-3629 Manila #2 (June 5, 2019)	DPAA0006923
4	Tab C – Memorandum from U.S. Army Human Resources Command, Review of Disinterment of Unknown X-3629 Manila #2 From the Manila American Cemetery and Memorial (Apr. 4, 2019)	DPAA0006924
5	Tab D – Memorandum from U.S. Army Human Resources Command, Family Request for Disinterment (Nov. 29, 2017)	DPAA0006925-DPAA0006936

#	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 July 10, 2018)	DPAA0006937-DPAA0006948
7	Tab F – DPAA Memorandum for Record, Association of Unknown X-3629 Manila #2 Cemetery With Two Unresolved World War II Casualties (June 3, 2019)	DPAA0006949-DPAA0006964
8	Tab G - Memorandum from Armed Forces Medical Examiner System, Family Reference Samples (FRS) for Three Unknowns Associated with X-3629 Manila #2 World War II (Apr. 18, 2019)	DPAA0006965-DPAA0006966
9	Memorandum from American Battle Monuments Commission (June 27, 2019)	DPAA0006967

6. I certify the administrative record for the June 28, 2019 decision of the Assistant Secretary of Defense for Manpower and Reserve Affairs to approve disinterment of nine graves associated with Cabanatuan Common Grave 407, 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 407, Cabanatuan Camp #1 (June 21, 2019)	DPAA0006968-DPAA0006969
2	Tab A – Memorandum from Assistant Secretary of Defense for Manpower and Reserve Affairs, Disinterment Recommendation for Common Grave 407, Cabanatuan Camp #1 Cemetery (June 28, 2019)	DPAA0006970

#	Document Title	Bates Number
3	Tab B – Memorandum from DPAA Director, Request for Disinterment of Nine World War II Unknowns Associated With Common Grave 407 Cabanatuan Camp #1 Cemetery (June 4, 2019)	DPAA0006971
4	Tab C – Letter from Jennifer Russell (Nov. 21, 2017)	DPAA0006972
5	Tab D – Memorandum from U.S. Army Resources Command, Review of Disinterment of nine World War II Unknowns associated with Cabanatuan Common Grave 407, U.S. Armed Forces Cemetery Manila #2, Philippines (Mar. 7, 2019)	DPAA0006973
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)	DPAA0006974-DPAA0006985
7	Tab F – DPAA Memorandum for Record, Disinterment of Nine Unknowns Associated with Common Grave 407 Cabanatuan Camp #1 Cemetery (June 3, 2019)	DPAA0006986-DPAA0006994
8	Tab G – Memorandum from Armed Forces Medical Examiner System, Family Reference Samples (FRS) for Twenty-Seven Unknowns Associated with Common Grave 407 Cabanatuan World War II (Apr. 1, 2019)	DPAA0006995-DPAA0006997
9	ABMC, Memorandum to Office of the Assistant Secretary of Defense (July 10, 2019)	DPAA0006998

7. 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 15th day of July, 2019, in Washington, D.C.

VALENTINE.LISIANE.M
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 Digitally signed by
 VALENTINE.LISIANE.MARGARET.11328
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 Date: 2019.07.16 20:39:49 -04'00'

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