

Exhibit “1” to Zaid Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE JAMES MADISON PROJECT,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:07cv01154 (RMU)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
)	

**DECLARATION OF JOSEPH W. LAMBERT,
DIRECTOR, INFORMATION MANAGEMENT SERVICES, OFFICE
OF THE CHIEF INFORMATION OFFICER, CENTRAL INTELLIGENCE AGENCY**

I, JOSEPH W. LAMBERT, hereby declare and say:

1. I am the Director of Information Management Services ("IMS") within the Office of the Chief Information Officer of the Central Intelligence Agency ("CIA"). I was selected for this position on 7 December 2007. I have held several senior, operational, and administrative positions in the CIA since 1984.

2. IMS's mission is to administer the CIA's information management program, which includes information and records management, classification management, declassification review and, when authorized and appropriate, the release of CIA information to the public. The Regulatory Services Branch, a component of IMS, is responsible for publishing and maintaining all CIA regulations.

3. As Director of IMS, I am responsible for management of the CIA's information review and release functions. Further,

ever greater amounts of information contained in the regulations as a series. As the withheld information in many of the regulations at issue appears harmless in isolation, the decision to disclose this information presents the danger that the same analysis will be applied repeatedly to pieces of individual regulations responsive to future disclosure requests. Indeed, when one analyzes the majority of the withheld information in piecemeal fashion, there does not appear to be a principled point at which to stop disclosure of additional regulations in the future as each piece of information appears individually harmless. The result will be a detailed mosaic of the CIA's intelligence sources and methods, organization, and functions being made available to entities hostile to the United States.

VI. THE CIA'S RECORD SYSTEMS AND PROCESSING OF FOIA REQUESTS

24. The CIA continually faces the risk that there may be a spy within its ranks. Prudence dictates the CIA take appropriate counterintelligence and security precautions to minimize the potential damage to national security that could result from a spy in the agency's midst. One way to minimize such damage is to limit the amount of information to which any particular employee has access. This policy provides an employee access only to that information required to perform the employee's duties. The CIA implements this policy through decentralizing and compartmenting its records systems.

25. The CIA Information and Privacy Coordinator in the IMS is the initial reception point for all FOIA requests. Under the direction and supervision of the CIA Information and Privacy Coordinator, experienced IMS information management professionals analyze each FOIA request and determine which CIA components might reasonably be expected to possess records responsive to a particular request. IMS then transmits a copy of the request to each relevant component. When a request is broad, it is quite common for IMS to transmit the request to many components. Because the CIA's records systems are decentralized and compartmented, each component must devise its own search strategy. Each component identifies which of its record systems it will search as well as what search tools, indices, and/or terms it will employ during the search. The information management professionals conducting FOIA searches in each component are the same professionals searching records to support the component's daily mission.

26. After a tasked component locates documents that may potentially be responsive to a FOIA request, information review and management personnel review the documents to determine, based on their experience with the FOIA review process, whether the documents are responsive to the request. Because of the nature of a particular records system and the search tools,

indices or terms employed during the search, a search may locate many documents that are not responsive to the request.

27. After removing the non-responsive documents, Information Review Officers review the remaining documents to determine which, if any, FOIA exemptions apply to the information contained therein, and whether they reasonably can segregate non-exempt information from exempt information. This process is laborious and time-consuming, but essential to avoid the inadvertent release of information the CIA must withhold from public disclosure in order to protect the effectiveness of its operations.

28. In the course of reviewing documents for exempt information and segregability, a component frequently identifies information that it must coordinate with, or refer to, another CIA component or another agency because the other component or agency originated the information or otherwise has an equity in it.⁵ This coordination and referral process itself can be quite time-consuming because other components and agencies have their own mission and FOIA procedures.

29. When all of the components and agencies complete their respective reviews, IMS professionals, under my direction and supervision, consolidate their various recommendations regarding

⁵ See Exec. Order No. 12,958 § 3.6(b), 60 Fed. Reg. 19,825 (Apr. 20, 1995), reprinted as amended in 50 U.S.C. § 435 note (Supp. V 2005).