

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY *et al.*,

Defendants.

Civil Action No. 18-cv-2473

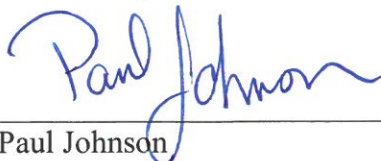
**SECOND DECLARATION OF PAUL
JOHNSON**

I, Paul Johnson, hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746 and submit this declaration in support of the Defendants' Motion to Dismiss Plaintiffs' Second Amended Complaint.

1. I am the Directives Manager, within the Office of the Under Secretary for Management, U.S. Department of Homeland Security. I am responsible for maintaining the DHS Directives system that contains official DHS policies. This declaration is based on my personal knowledge and on information that I reviewed pertaining to my official duties as an employee of DHS.
2. I hereby certify that the document, attached hereto consisting of 13 pages total, is a true and exact copy of the current DHS Instruction 141-01-001, Revision 00.1, "Records and Information Management," issued 06/08/2017.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this the 10 day of September, 2019 in Washington, D.C.



Paul Johnson
DHS Directives Manager
Office of the Under Secretary for Management
Department of Homeland Security