

DAVIS WRIGHT TREMAINE LLP

1 THOMAS R. BURKE (CA State Bar No. 141930)
 DAVIS WRIGHT TREMAINE LLP
 2 505 Montgomery Street, Suite 800
 San Francisco, California 94111
 3 Telephone: (415) 276-6500
 Facsimile: (415) 276-6599
 4 Email: thomasburke@dwt.com

5 RONALD G. LONDON (Pro Hac Vice)
 DAVIS WRIGHT TREMAINE LLP
 6 1919 Pennsylvania Ave., N.W., Suite 800
 Washington, DC 20006
 7 Telephone: (202) 973-4200
 Email: ronnielondon@dwt.com

8 DAVID HALPERIN (Pro Hac Vice)
 9 1530 P Street NW
 Washington, DC 20005
 10 Telephone: (202) 905-3434
 Email: davidhalperindc@gmail.com

11 DAN LAIDMAN (State Bar No. 274482)
 12 DAVIS WRIGHT TREMAINE LLP
 865 South Figueroa Street, Suite 2400
 13 Los Angeles, CA 90017-2566
 Telephone: (213) 633-6800
 14 Facsimile: (213) 633-6899
 Email: danlaidman@dwt.com

15 Attorneys for Plaintiff Public.Resource.Org

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 17 IN THE UNITED STATES DISTRICT COURT
 18 THE NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

21 PUBLIC.RESOURCE.ORG., a California non-) Case No. 3:13-CV-02789-WHO
 profit organization,)

22 Plaintiff,)

) **DECLARATION OF SCOTT KLEIN**

23 v.)

24 UNITED STATES INTERNAL REVENUE)
 25 SERVICE,)

26 Defendant.)
 _____)

1 I, Scott Klein, declare as follows:

2 1. Since 2008, I have worked for ProPublica, where I am an Assistant Managing
3 Editor. From 1998 to 2008, I worked in several capacities at The Nation. I have personal
4 knowledge of the matters stated in this declaration and could competently testify to them if called
5 as a witness.

6 2. ProPublica is a nonprofit news organization that produces investigative journalism
7 in the public interest. ProPublica was awarded the 2011 Pulitzer Prize for National Reporting, a
8 2010 Pulitzer Prize for Investigative Reporting and a Peabody Award (the highest honor in
9 broadcast journalism) in 2013. ProPublica can be found at <http://www.propublica.org/>.

10 3. From 2009 through 2011, I also served as President and Co-founder of
11 DocumentCloud. DocumentCloud is an online service that helps journalists work with primary
12 source documents. DocumentCloud is now used by more than 900 newsrooms around the world
13 and contains 17 million pages of documents, including many instances of the Form 990.
14 DocumentCloud may be found at <http://www.documentcloud.org/home>.

15 4. We were able to create DocumentCloud after being awarded a grant from the John
16 S. and James L. Knight Foundation, as a winner of a competition called the Knight News
17 Challenge, which is designed to accelerate media innovation by funding breakthrough ideas. The
18 Knight News Challenge can be found at <https://www.newschallenge.org/>.

19 5. At ProPublica, we make extensive use of the Form 990 in researching stories. We
20 have also created an interactive database called "Nonprofit Explorer," which allows individuals to
21 quickly search over 1.1 million Form 990s. The Nonprofit Explorer can be found at
22 <http://projects.propublica.org/nonprofits/>.

23 6. Lack of availability of the Form 990 in machine-processable formats, that is in
24 Modernized e-File (MeF) format instead of a scanned document or other bitmap format, is a
25 substantial impediment in our work. With scanned and bitmap images, reporters must leaf
26 through the Form 990s by hand and then re-enter data into analysis tools such as a database
27 management system or a spreadsheet program.

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7. While Optical Character Recognition (OCR) is used in systems such as DocumentCloud to recognize text in documents, OCR is a slow and cumbersome process and is subject to errors. This is particularly true with low-resolution bitmap images, such as those released for the Form 990.

8. Availability of returns in MeF format would permit our programmers and journalists to easily, accurately, and systematically put information from the Form 990 into analysis tools. Availability of returns in MeF format would make it much easier for ProPublica and all journalists to report on a single nonprofit as well as to write stories that systematically examine a large number of returns.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 23rd day of September, 2014 at New York, N.Y.

/s/ Scott Klein
SCOTT KLEIN