

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Valerie Plame Wilson, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil No. 07 CV 4595 (BSJ)
	)	
J. Michael McConnell, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF KAREN F. TUMOLO,  
SENIOR BENEFITS SPECIALIST,  
OFFICE OF PERSONNEL RESOURCES, DIRECTORATE OF SUPPORT,  
CENTRAL INTELLIGENCE AGENCY**

I, KAREN F. TUMOLO, pursuant to 28 U.S.C. § 1746,  
hereby declare as follows:

1. I am a Senior Benefits Specialist for the Office of Personnel Resources, Employee Benefits Group (OPR/EBG), within the Directorate of Support (DS) of the Central Intelligence Agency. I have held this position since May 2007. Prior to assuming my current position, I was Chief of Retirement and Insurance Services within the OPR/EBG. I have held administrative positions within the CIA for over 30 years, and have worked within the personnel and human resources area for the last 17 years.

2. Through the exercise of my official duties, I am familiar with this civil action. I make the following

statements based upon my personal knowledge and information made available to me in my official capacity.

3. This declaration cites the specific tab in the Unclassified Administrative Record ("Unclassified AR Tab") where a particular cited document can be found.

4. The purpose of this declaration is to state the facts relating to the 10 February 2006 letter to Valerie Wilson (Unclassified AR Tab 1), which I signed. At the time I signed this letter, I held the position of Chief, Retirement and Insurance Services.

5. As Chief, Retirement and Insurance Services, I was responsible for managing the CIA's retirement and insurance benefits programs. These responsibilities included overseeing the office that communicates directly with CIA employees regarding the retirement and insurance benefits to which they are entitled.

6. In my position as Chief, Retirement and Insurance Services, I did not have the authority to declassify information or to otherwise disclose classified information, including classified information relating to employee status.

7. In late 2005, Valerie Wilson contacted my office. Ms. Wilson stated that she was in the process of resigning

from the CIA and requested information regarding her eligibility for her retirement annuity.

8. In order to respond to Ms. Wilson's request, employees in my office located Ms. Wilson's personnel file. Based on a review of this file, a member of my office created a summary of Ms. Wilson's service.

9. Before responding to a request such as the one made by Ms. Wilson, my office would follow standard operating procedures and verify that the employee's status, and the contents of any communications sent by my office, were not classified. In order to do so, my office would review the information in the employee's file to determine its classification. The employees in my office neglected to perform such a classification review of Ms. Wilson's personnel file. As a consequence, the summary of Ms. Wilson's service was not properly marked to indicate that the information was classified.

10. Ms. Wilson resigned from the CIA on January 9, 2006. The improperly marked summary of Ms. Wilson's service was incorporated into a draft letter to Ms. Wilson. At the time I signed the 10 February 2006 letter, I did not know that its contents were classified. When I signed this letter, I did not make any decision to declassify information, nor did I have the authority to do so. At no

time did I, or anyone in my office, make a deliberate decision to declassify information or disclose classified information. In addition, at no time did any CIA official with the authority to declassify information make the decision to declassify or otherwise disclose the classified information contained in the letter.

11. Because the summary of Ms. Wilson's service contained classified information, it should have been communicated to her only through secure means. It was a mistake to mail the improperly marked letter containing classified information to Ms. Wilson.

12. Subsequent to the release of the letter, in early 2007, I learned that the letter did contain classified information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of July, 2007.

Karen F Tumolo

Karen F. Tumolo  
Senior Benefits Specialist  
Office of Personnel Resources  
Directorate of Support  
Central Intelligence Agency