



MARCIA HOFMANN ESQ  
ELECTRONIC FRONTIER FOUNDATION  
454 SHOTWELL STREET  
SAN FRANCISCO, CA 94110

December 19, 2007

Subject: INVESTIGATIVE DATA WAREHOUSE

FOIPA No. 1058805- 000

Dear Requester:

The enclosed documents were reviewed under the Freedom of Information/Privacy Acts (FOIPA), Title 5, United States Code, Section 552/552a. Deletions have been made to protect information which is exempt from disclosure, with the appropriate exemptions noted on the page next to the excision. In addition, a deleted page information sheet was inserted in the file to indicate where pages were withheld entirely. The exemptions used to withhold information are marked below and explained on the enclosed Form OPCA-16a:

**Section 552**

**Section 552a**

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| <input type="checkbox"/> (b)(1)            | <input type="checkbox"/> (b)(7)(A)            | <input type="checkbox"/> (d)(5) |
| <input type="checkbox"/> (b)(2)            | <input type="checkbox"/> (b)(7)(B)            | <input type="checkbox"/> (j)(2) |
| <input type="checkbox"/> (b)(3) _____      | <input checked="" type="checkbox"/> (b)(7)(C) | <input type="checkbox"/> (k)(1) |
| _____                                      | <input checked="" type="checkbox"/> (b)(7)(D) | <input type="checkbox"/> (k)(2) |
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206 **page(s)** were reviewed and 206 **page(s)** are being released.

- Document(s) were located which originated with, or contained information concerning other Government agency(ies) [OGA]. This information has been:
  - referred to the OGA for review and direct response to you.
  - referred to the OGA for consultation. The FBI will correspond with you regarding this information when the consultation is finished.

You have the right to appeal any denials in this release. Appeals should be directed in writing to the Director, Office of Information and Privacy, U.S. Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, D.C. 20530-0001 within sixty days from the date of this letter. The envelope and the letter should be clearly marked "Freedom of Information Appeal" or "Information Appeal." Please cite the FOIPA number assigned to your request so that it may be easily identified.

The enclosed material is from the main investigative file(s) in which the subject(s) of your request was the focus of the investigation. Our search located additional references, in files relating to other individuals, or matters, which may or may not be about your subject(s). Our experience has shown, when ident, references usually contain information similar to the information processed in the main file(s). Because of our significant backlog, we have given priority to processing only the main investigative file(s).

If you want the references, you must submit a separate request for them in writing, and they will be reviewed at a later date, as time and resources permit.

See additional information which follows.

Sincerely yours,



David M. Hardy  
Section Chief  
Record/Information  
Dissemination Section  
Records Management Division

Enclosure(s)

The enclosed documents represent the third of a series of interim releases that will be made with regard to your request pertaining to the Investigative Data Warehouse.

For your information, some of the enclosed pages contain information about other subject matters. We consider this information "out side the scope" of your request, and have redacted the information and marked it "o/s".

## EXPLANATION OF EXEMPTIONS

### SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute(A) requires that the matters be withheld from the public in such a manner as to leave no discretion on issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information ( A ) could be reasonably be expected to interfere with enforcement proceedings, ( B ) would deprive a person of a right to a fair trial or an impartial adjudication, ( C ) could be reasonably expected to constitute an unwarranted invasion of personal privacy, ( D ) could reasonably be expected to disclose the identity of confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, ( E ) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or ( F ) could reasonably be expected to endanger the life or physical safety of any individual;
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

### SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

FBI Information Sharing Policy Group

Minutes: July 26, 2004

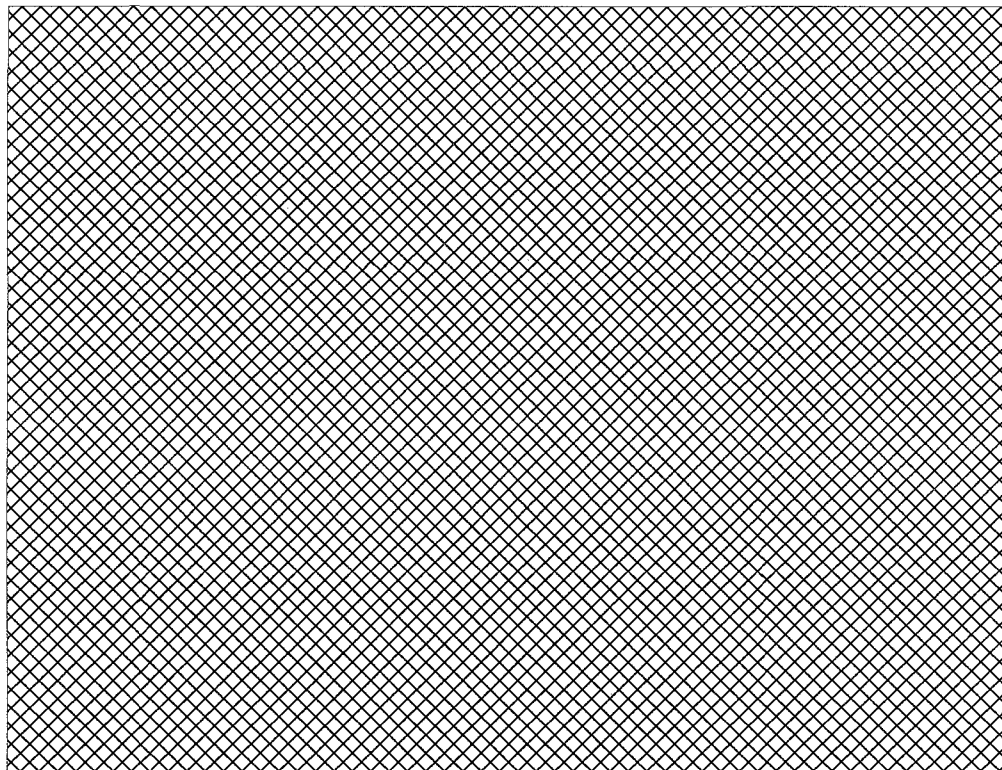
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DATE 08-28-2007 BY 65179 dmh/bja/cal

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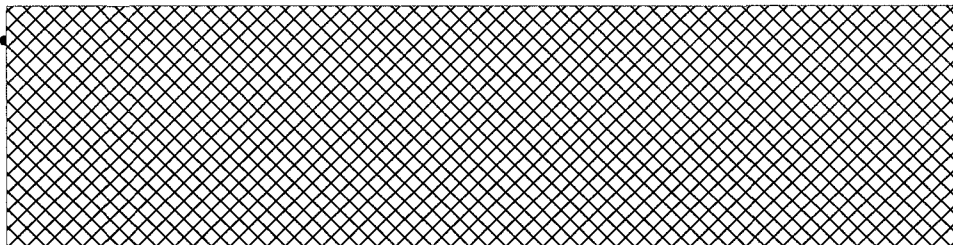
1. IDW Issues:

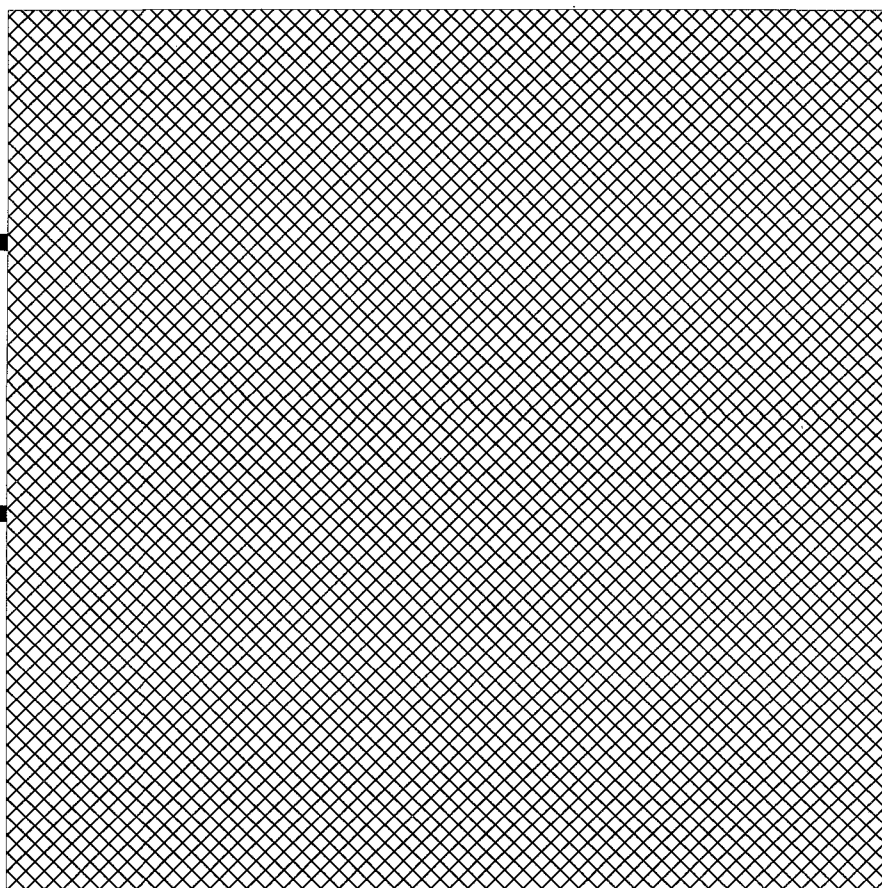


- **Policy and Privacy Impact Issues** [redacted] described the policy questions relevant to the ISPG concerning the need for approval of data sources and users access. There is an approved Privacy Impact Assessment (PIA) for IDW-S; a PIA for CTD/SPT has been drafted, but not yet submitted to the OGC. It was pointed out that the link between IDW-S and CTD/SPT may have invalidated the original IDW-S Privacy Impact Assessment (PIA). It was agreed that an up-to-date PIA is an urgent requirement, and that no new data sources should be added until the PIA has been reviewed by OGC. [action]

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OTHER O/S





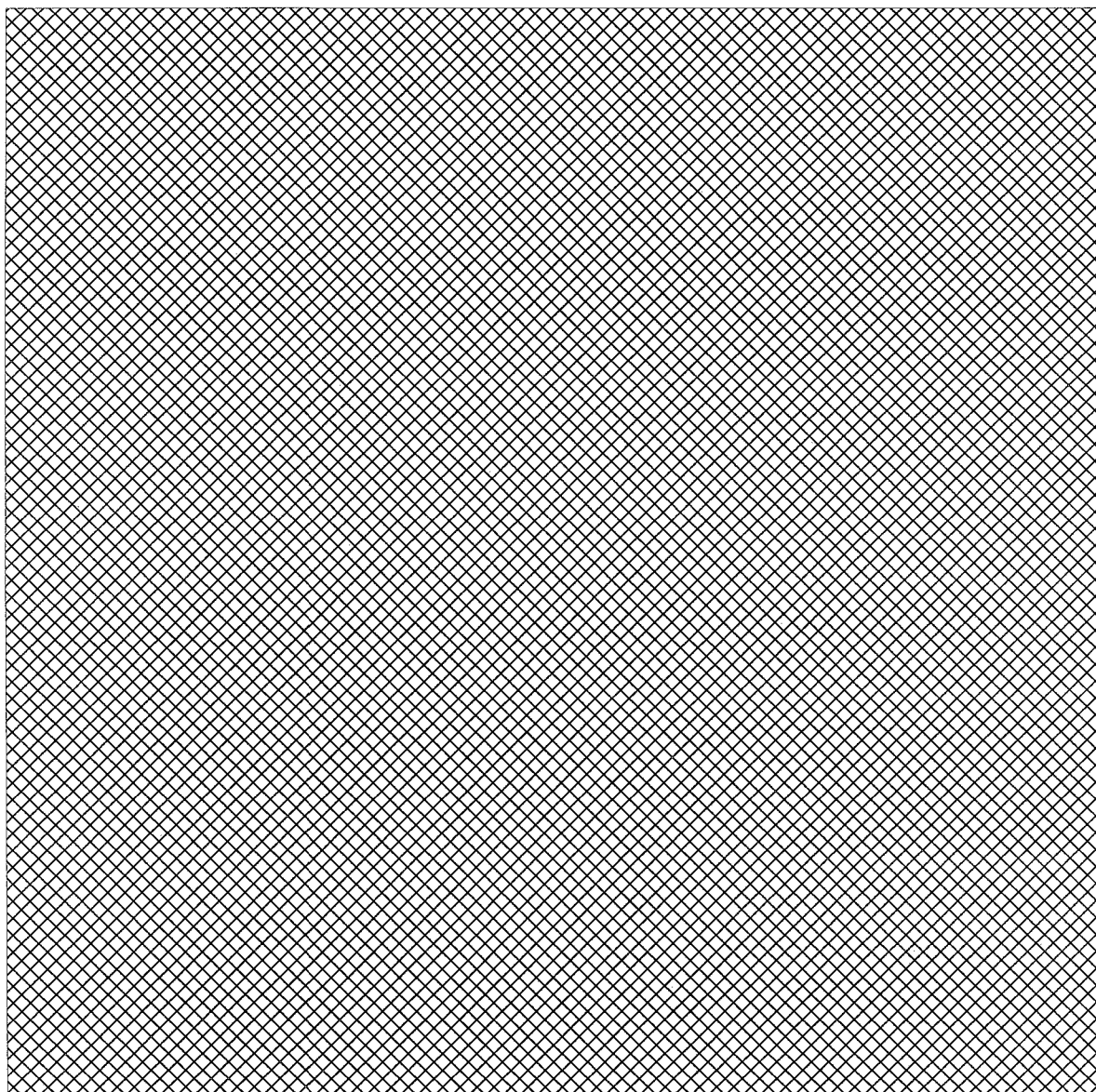
- **Summary and Actions.** The IDW has been successful as a tool, but the lack of any management construct to regulate and create policy for users and data puts the project in peril. We need to make sure that the analysts can use this system and feel comfortable that they are aware of “all the dots,” but the project must attend to privacy impact and related policy issues. EAD [REDACTED] stated that IDW and SPT must complete the Privacy Impact Assessment for the system as it currently stands and submit it to OGC immediately. [action] EAD [REDACTED] and EAD-I [REDACTED] directed Mr [REDACTED] to create a team from the ISPG to work on the details of the discretionary access and audit functions, the protocols governing the use of IDW by non-FBI employees, and the management construct that will regulate IDW use and development. The team is to have representation from OGC, RMD, and SecD. The output of the group would be presented to the ISPG and would be pertinent “build-to” requirements that would be used by the IDW contractors. The team would also review and recommend emergency procedures to be used when the addition of users or data to the system is urgently required because of external circumstances. [action]
- **Decisions.**

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1. The ISPG will not delegate authority to CTD or the IDW project to add new data sources to IDW. The issue will be reconsidered once a policy framework and a management construct has been put into place. **[decision]**
2. The current data sources in IDW and CTD/SPT can continue to be used pending the outcome of the OGC review of the new IDW PIA. **[decision]** See attached list.
3. The request for authority for the IDW Project Manager to set up and populate with data a standalone test and development system is approved. **[decision]**

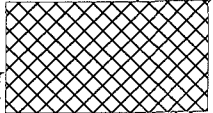
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**FEDERAL BUREAU OF INVESTIGATION**  
**INFORMATION RESOURCES DIVISION**  
**ENGINEERING AND INTEGRATION SECTION**



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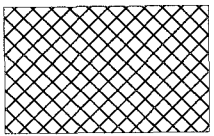
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May 2003

***FULL PRIVACY IMPACT ASSESSMENT***

***FOR THE***

***INVESTIGATIVE DATA WAREHOUSE (IDW)***



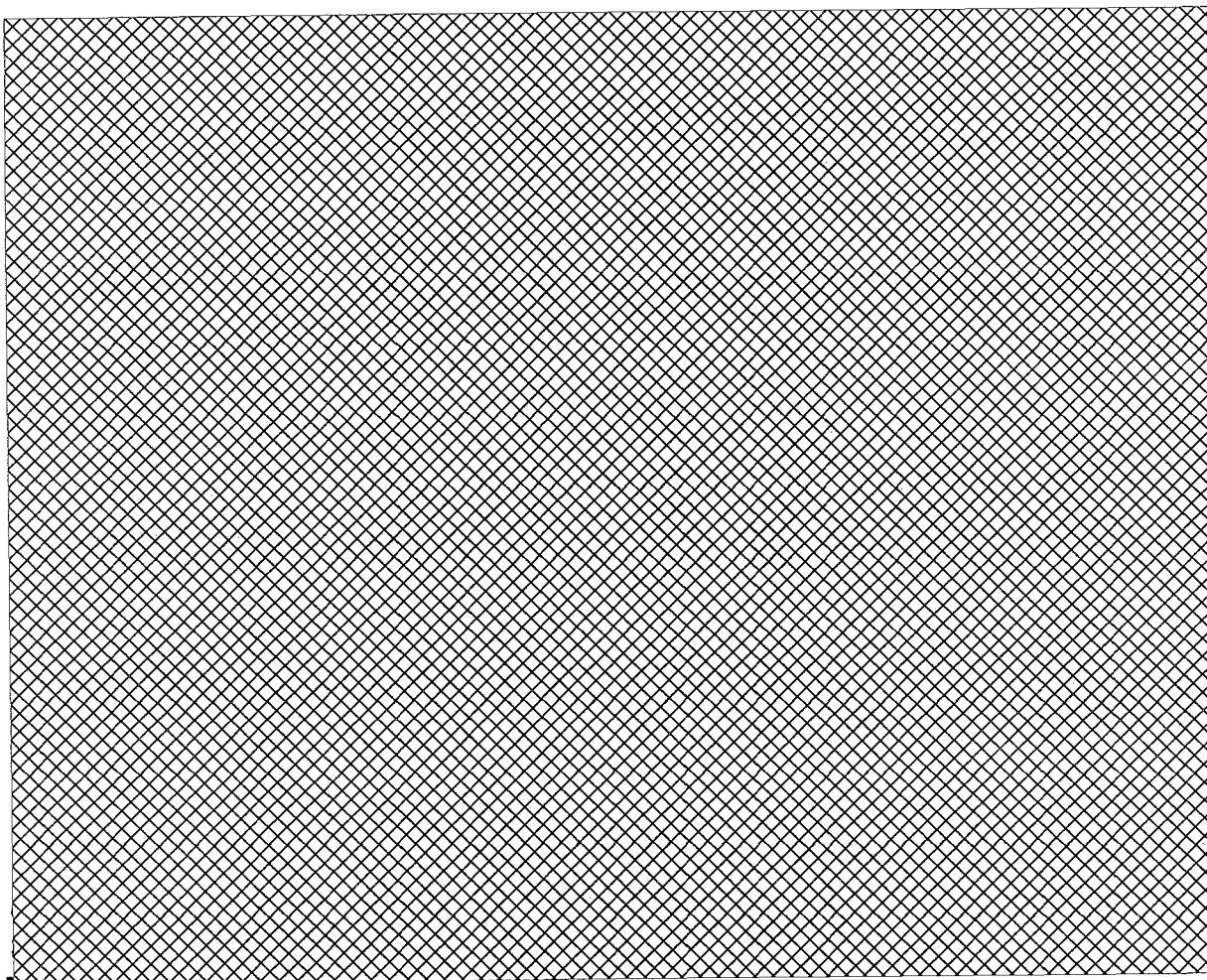
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Investigative Data Warehouse (IDW)

Full Privacy Impact Assessment, MIOG 16-21.5

Executive Summary

This full Privacy Impact Assessment (PIA) is submitted by the Information Resources Division in accordance with MIOG 16-21.3, *Completing a Privacy Impact Assessment*, and MIOG 16-21.5, Paragraphs A, B, C, and D. This assessment is intended to address MIOG requirements for the enterprise Investigative Data Warehouse (IDW) system, and is submitted in coordination with Office of General Counsel for approval.

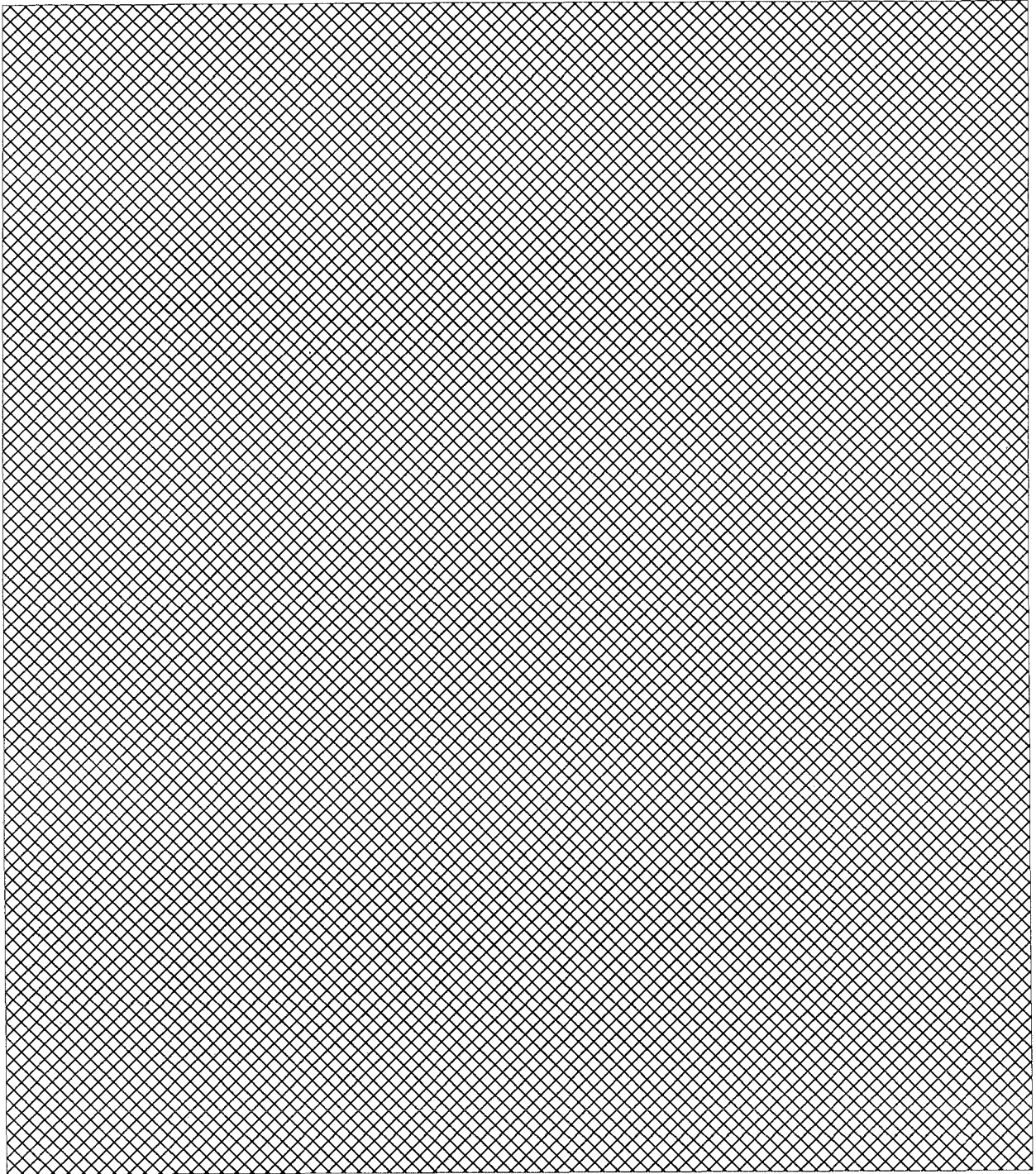


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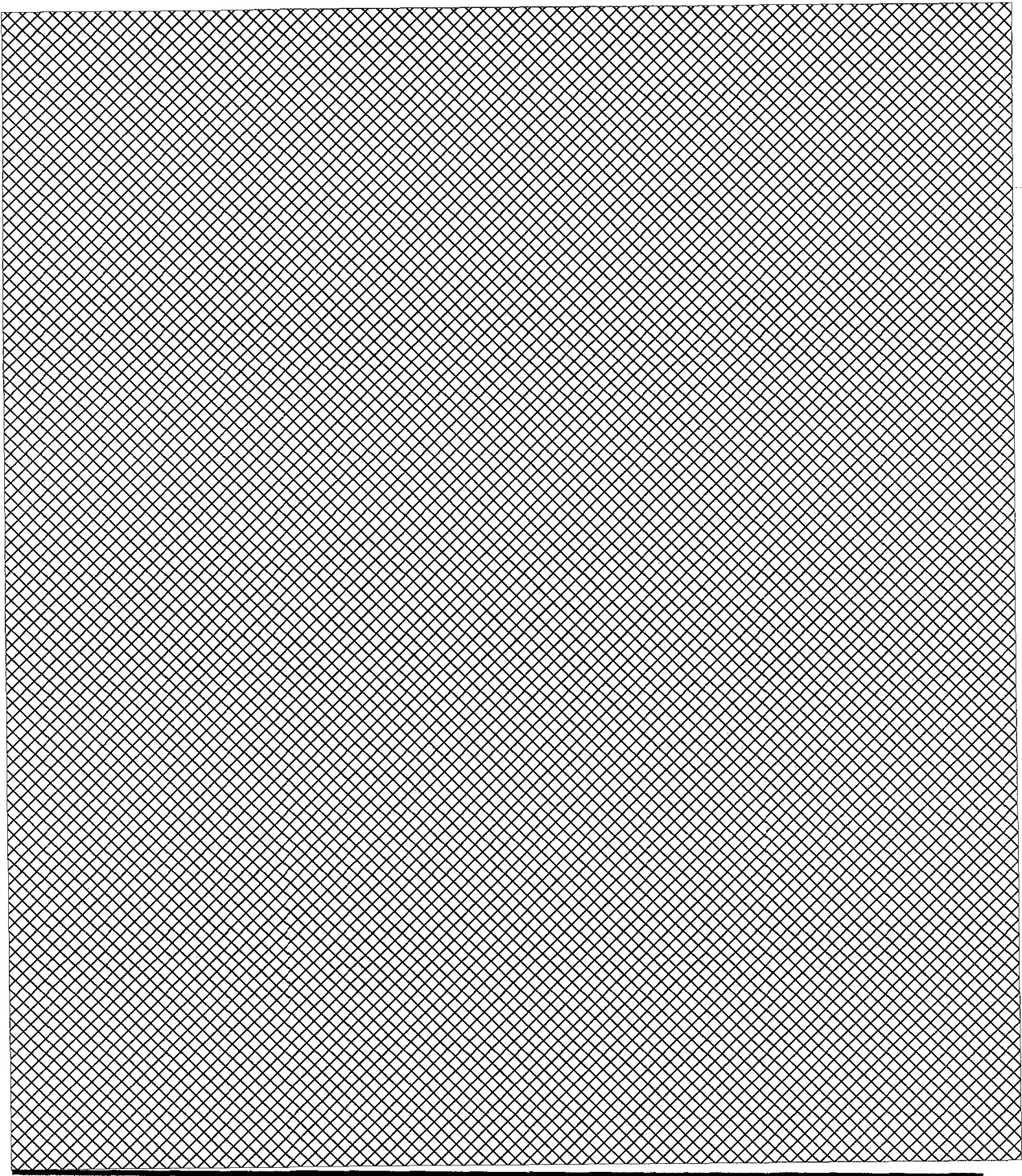


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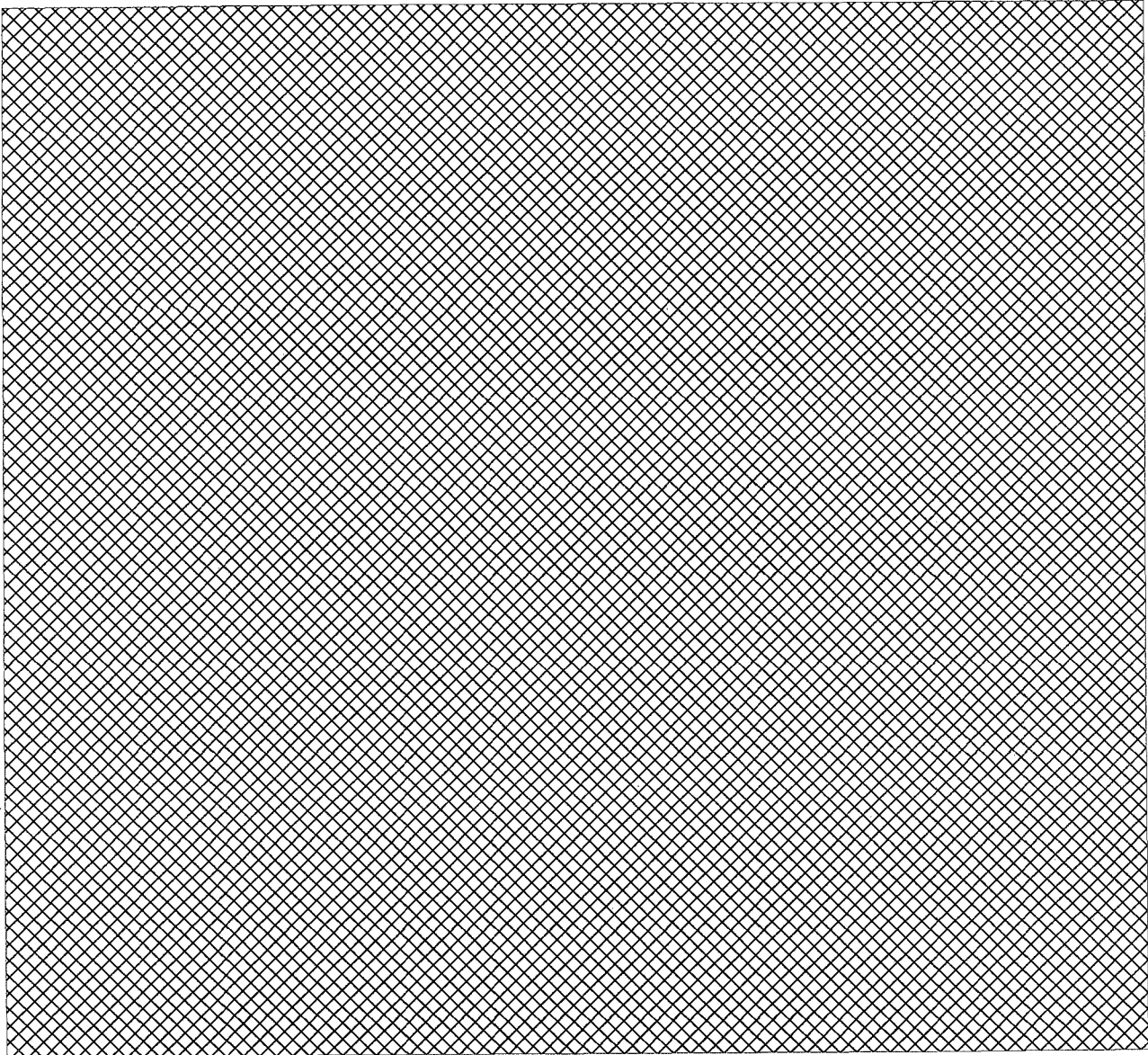


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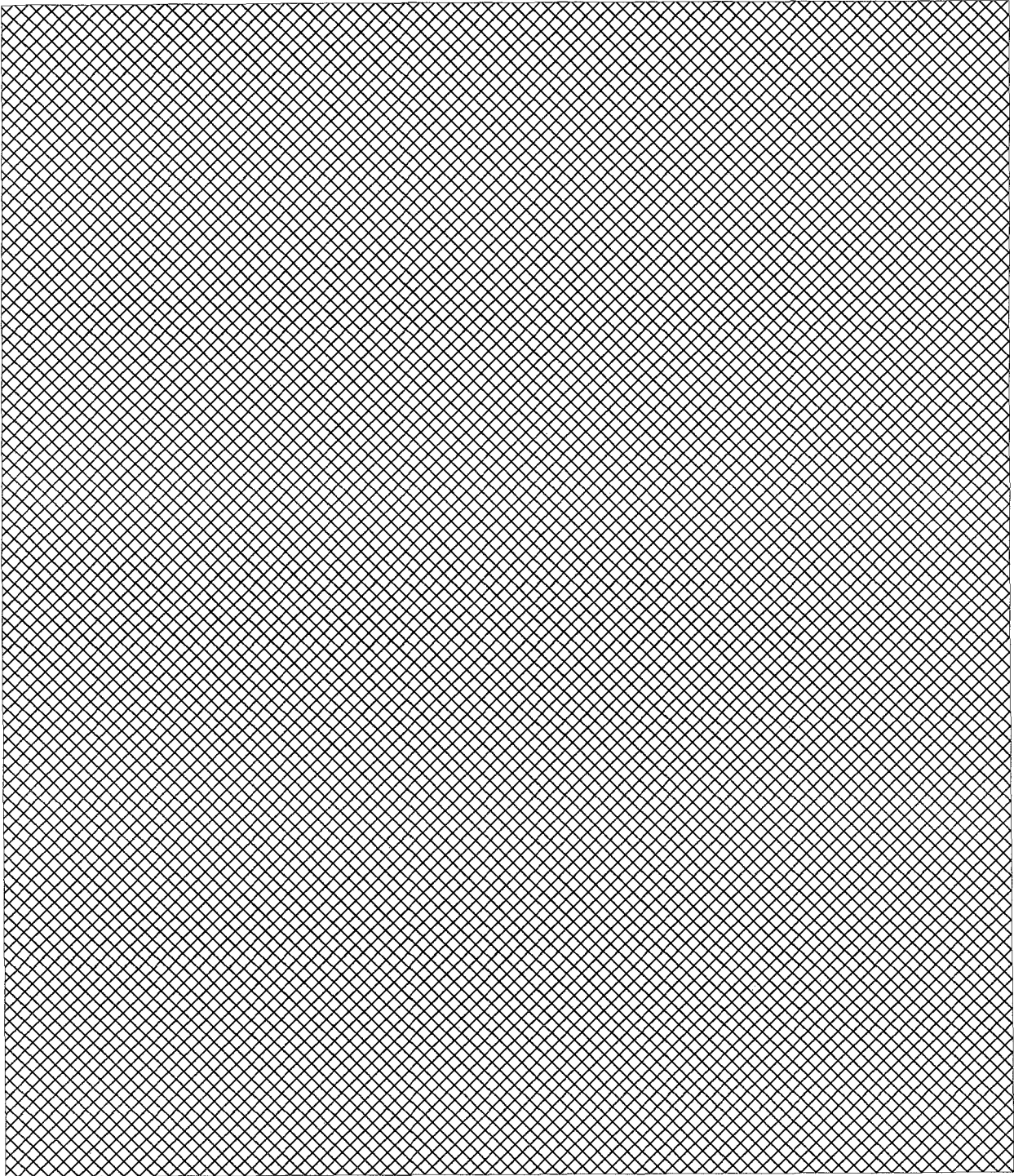


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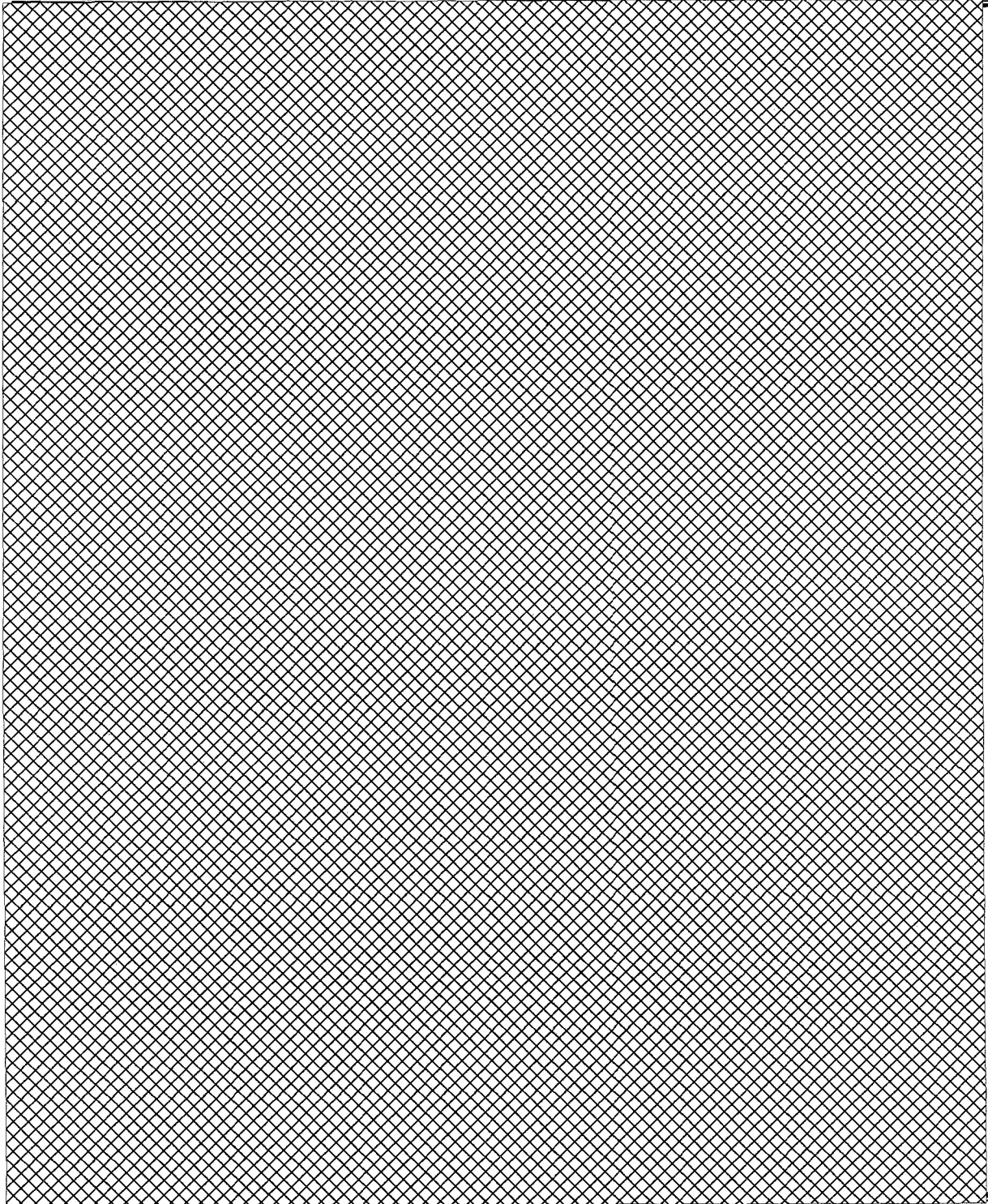
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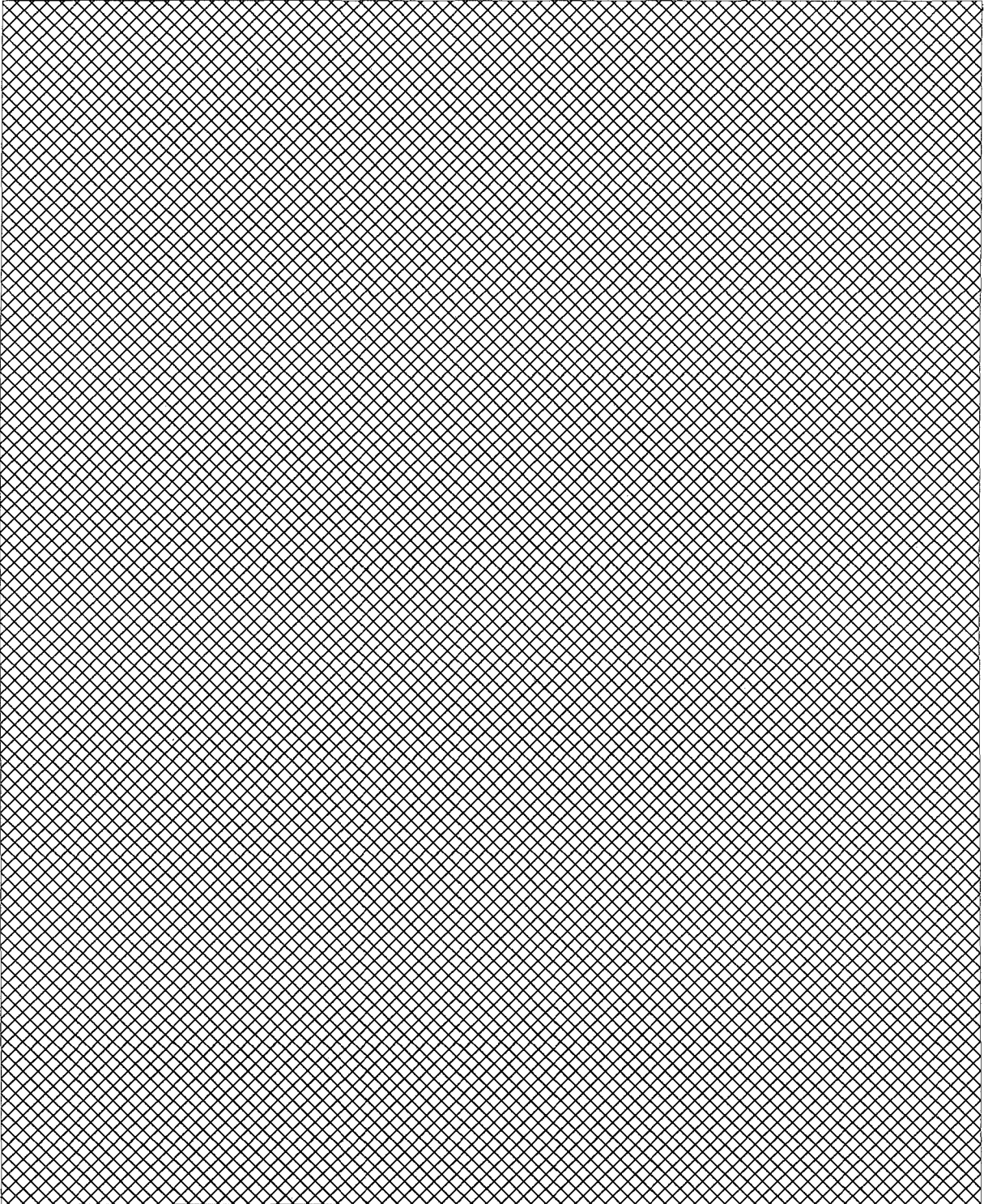
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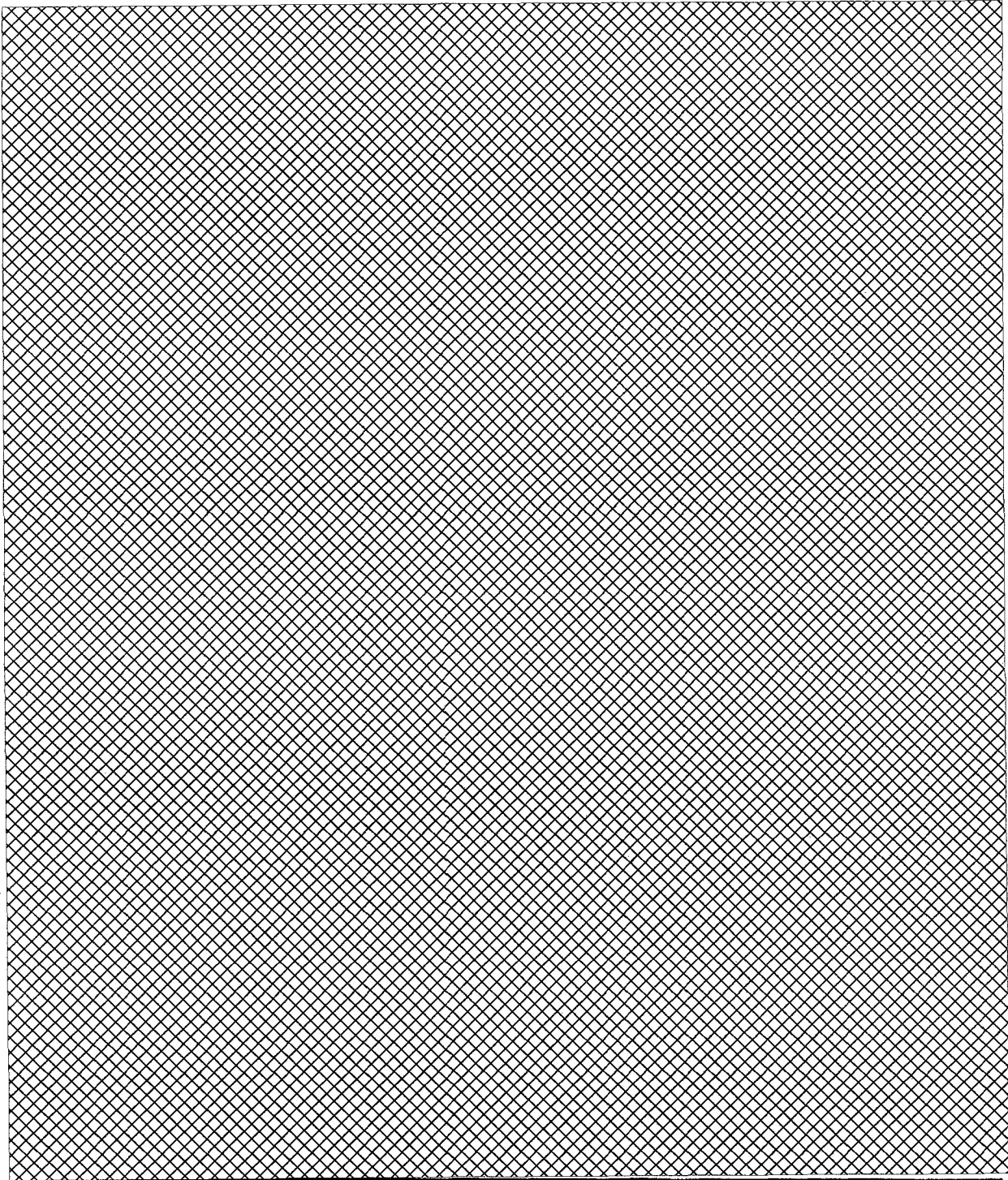
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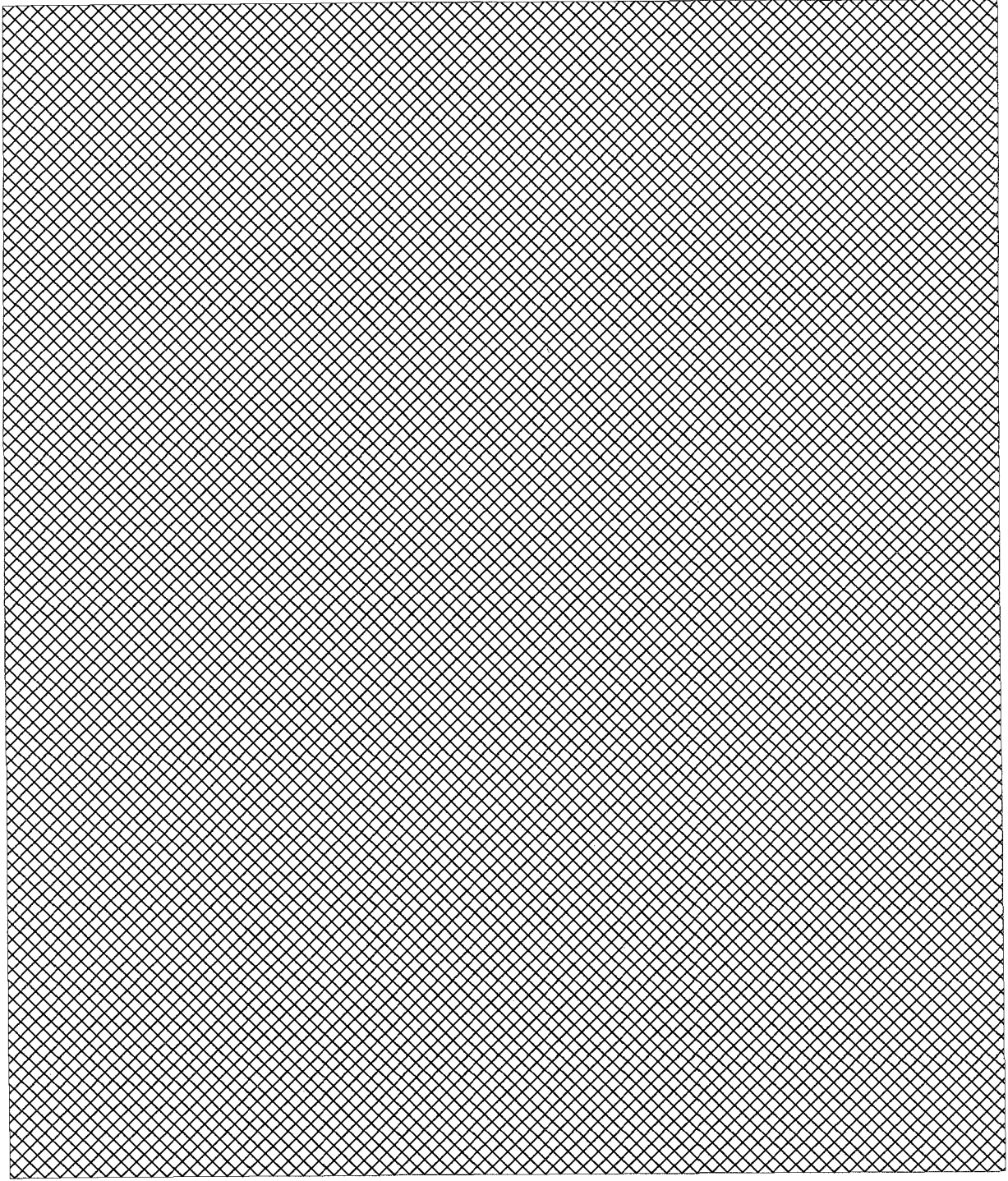
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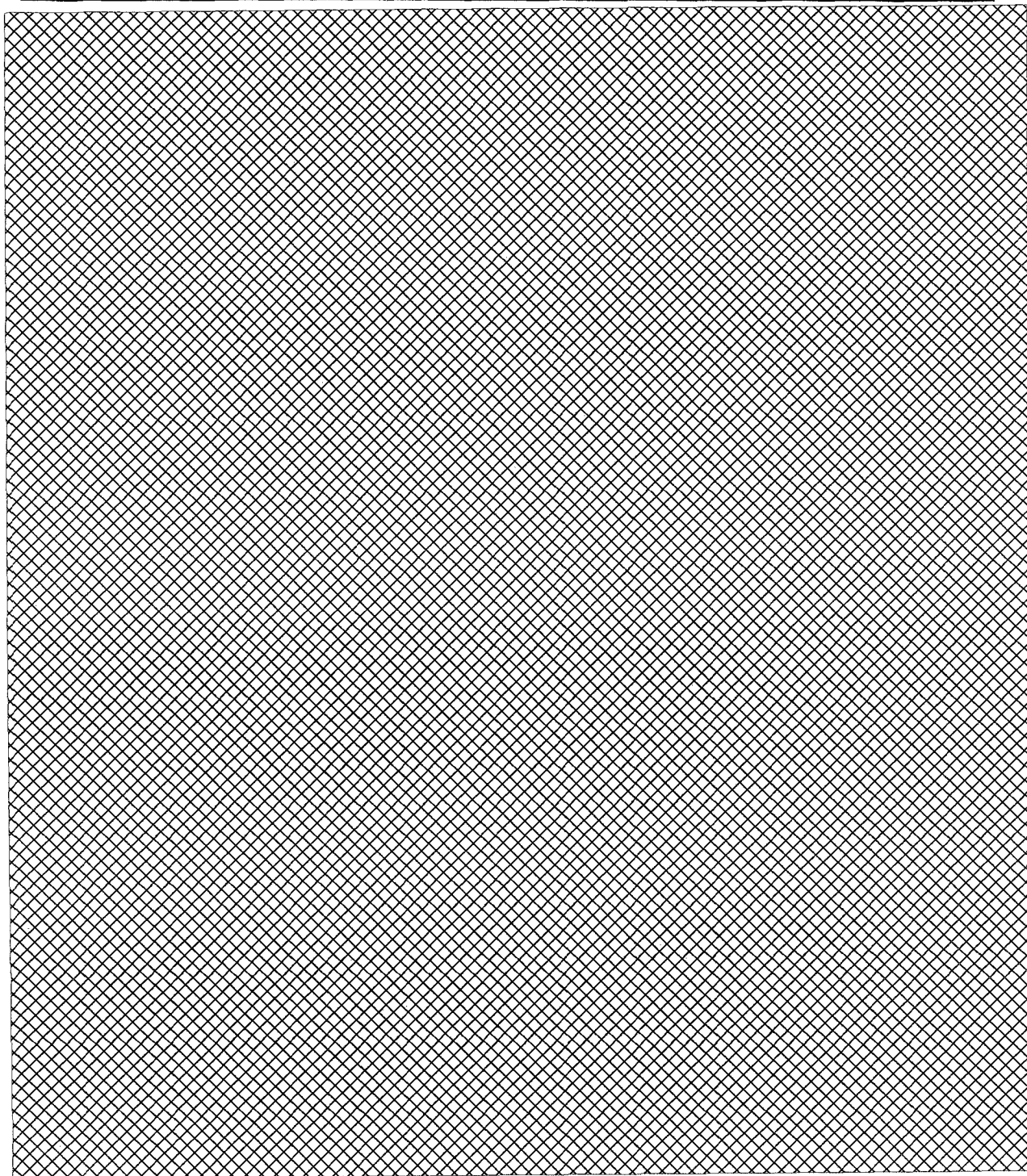


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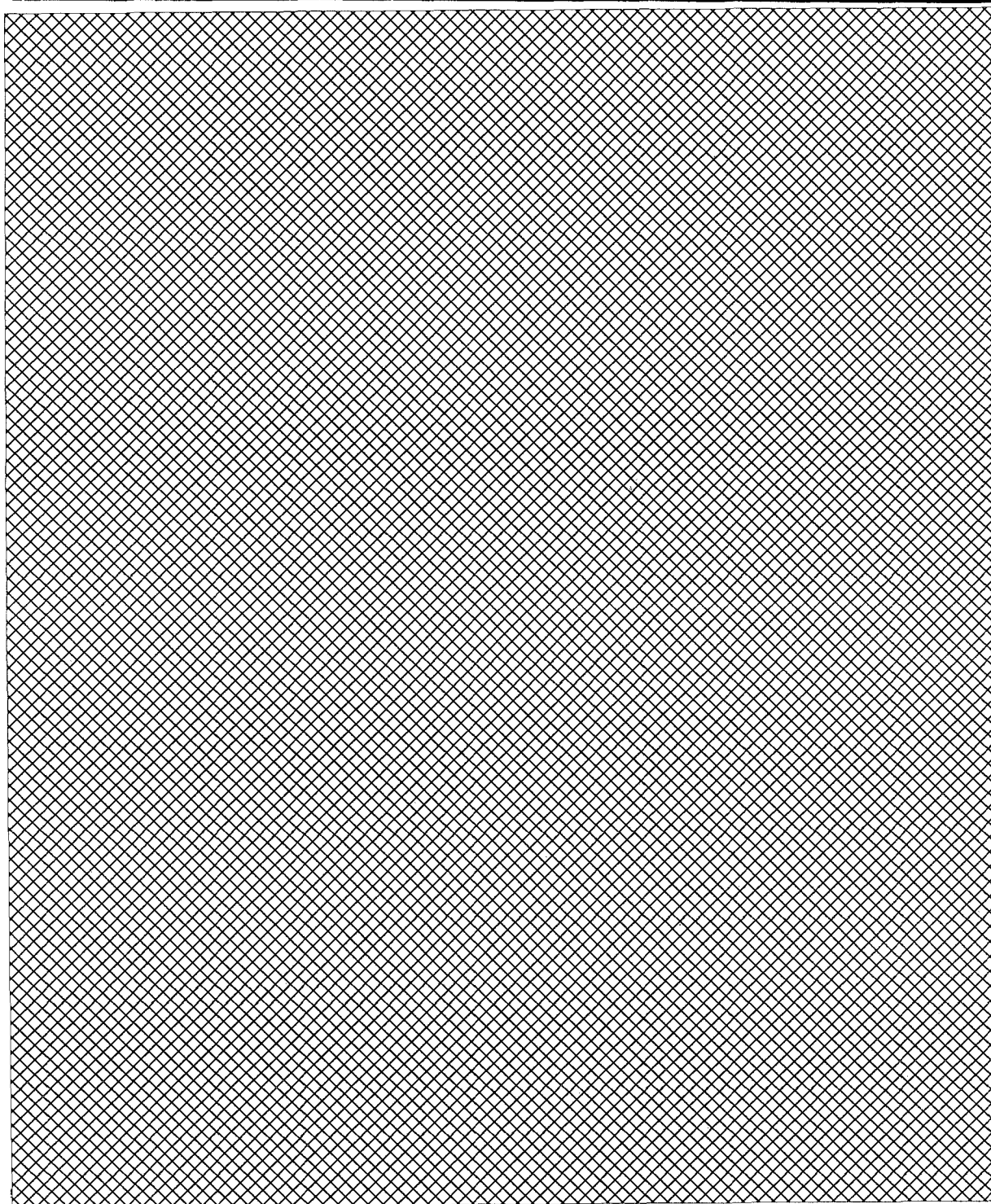
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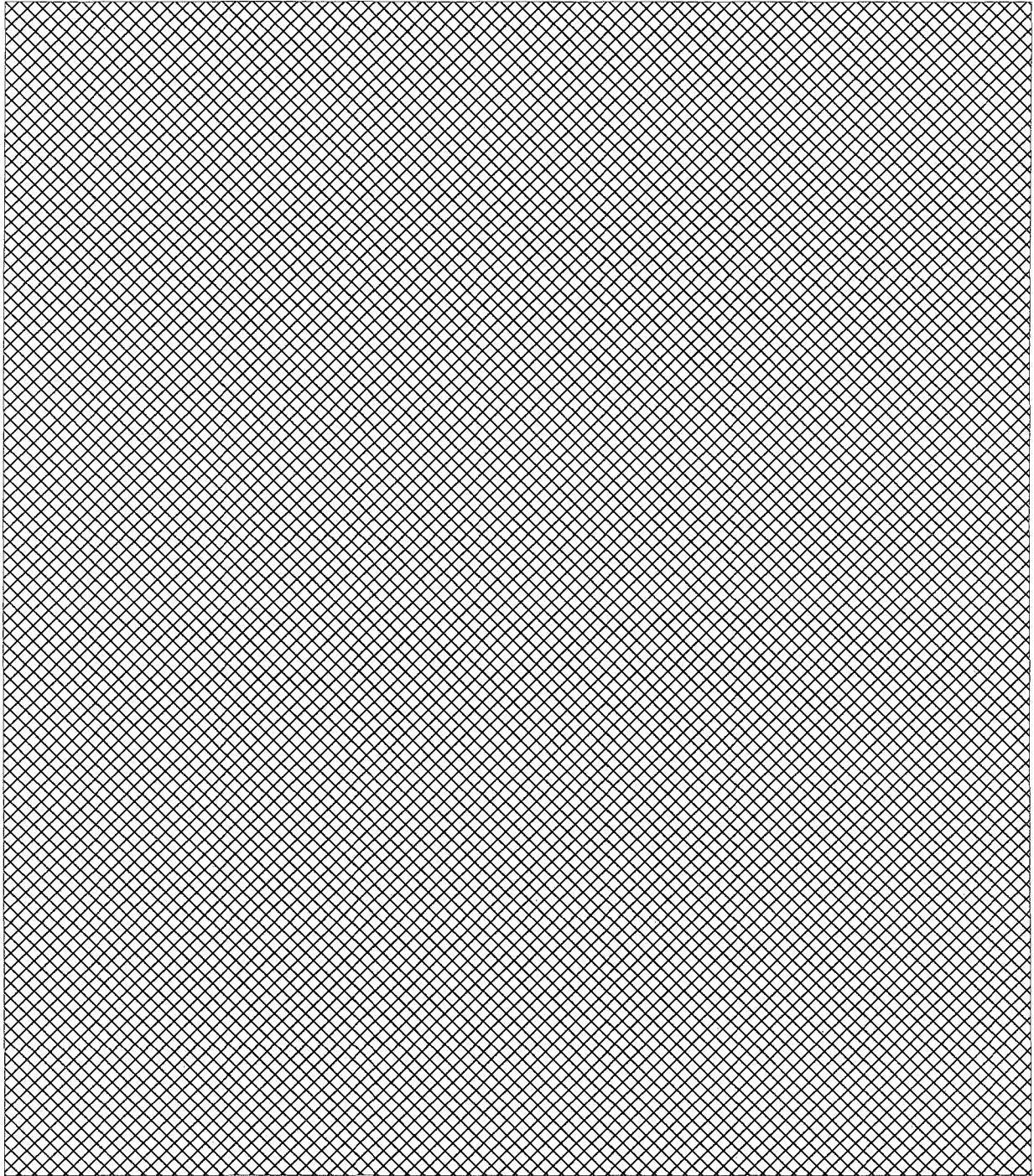


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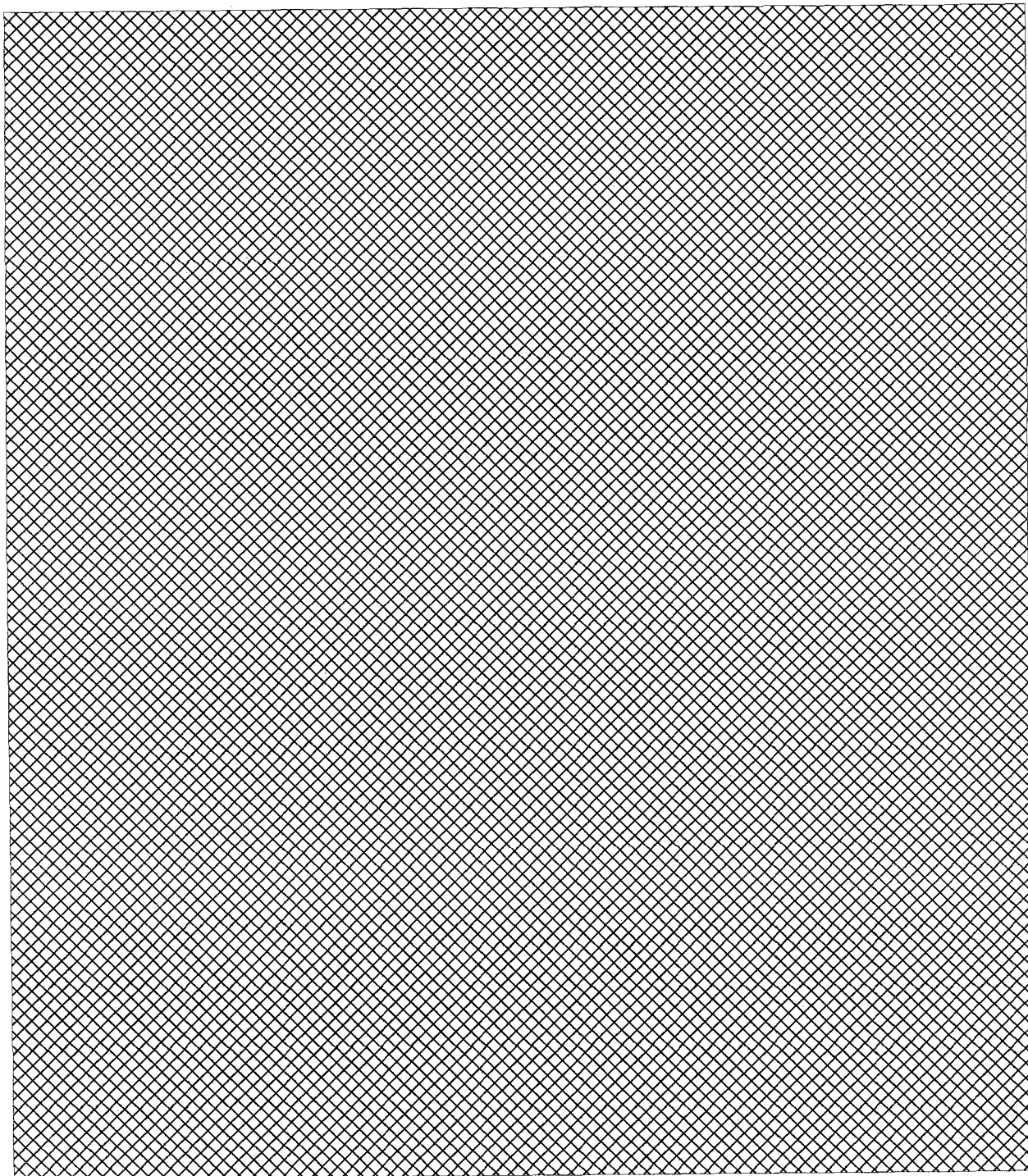
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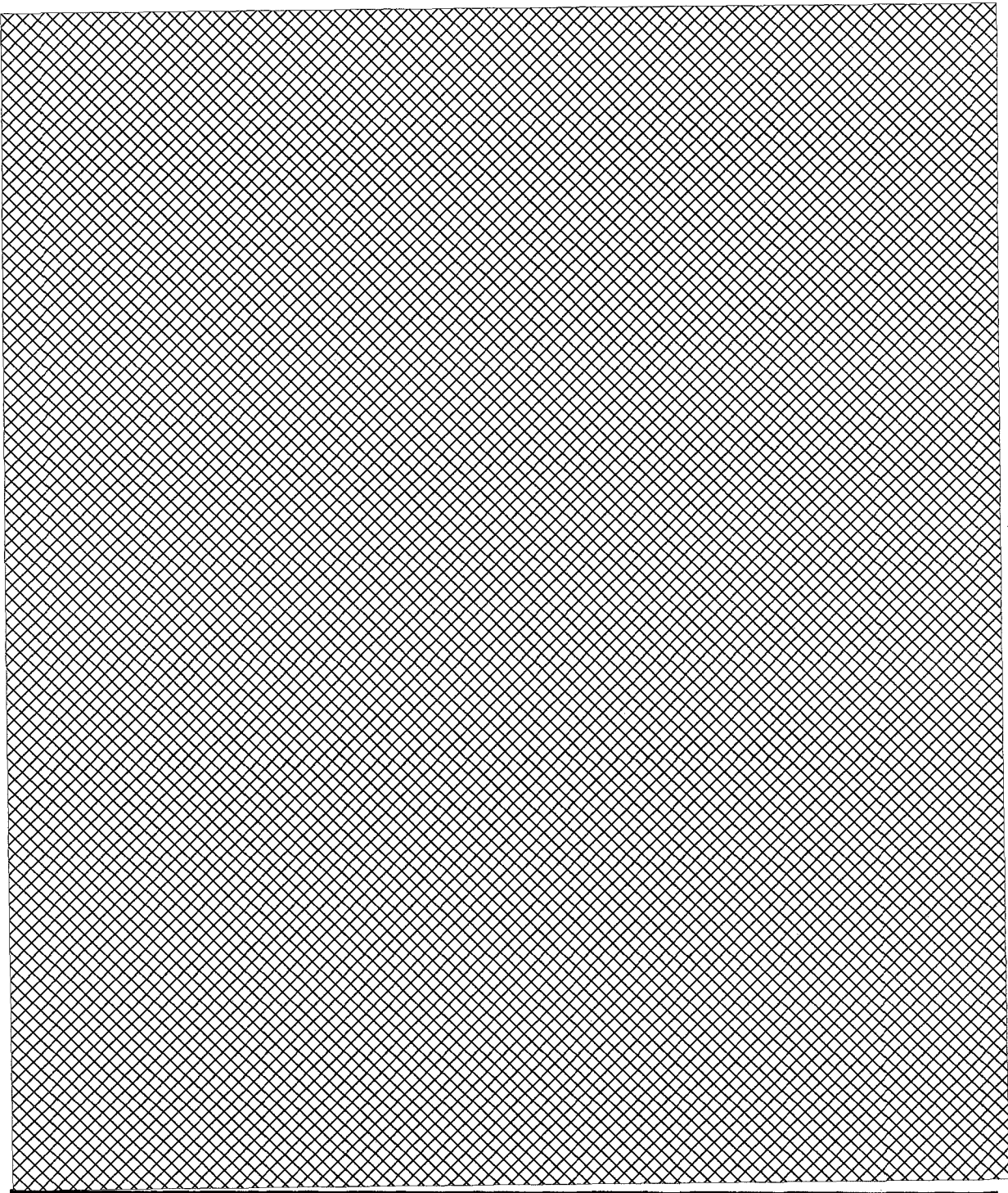


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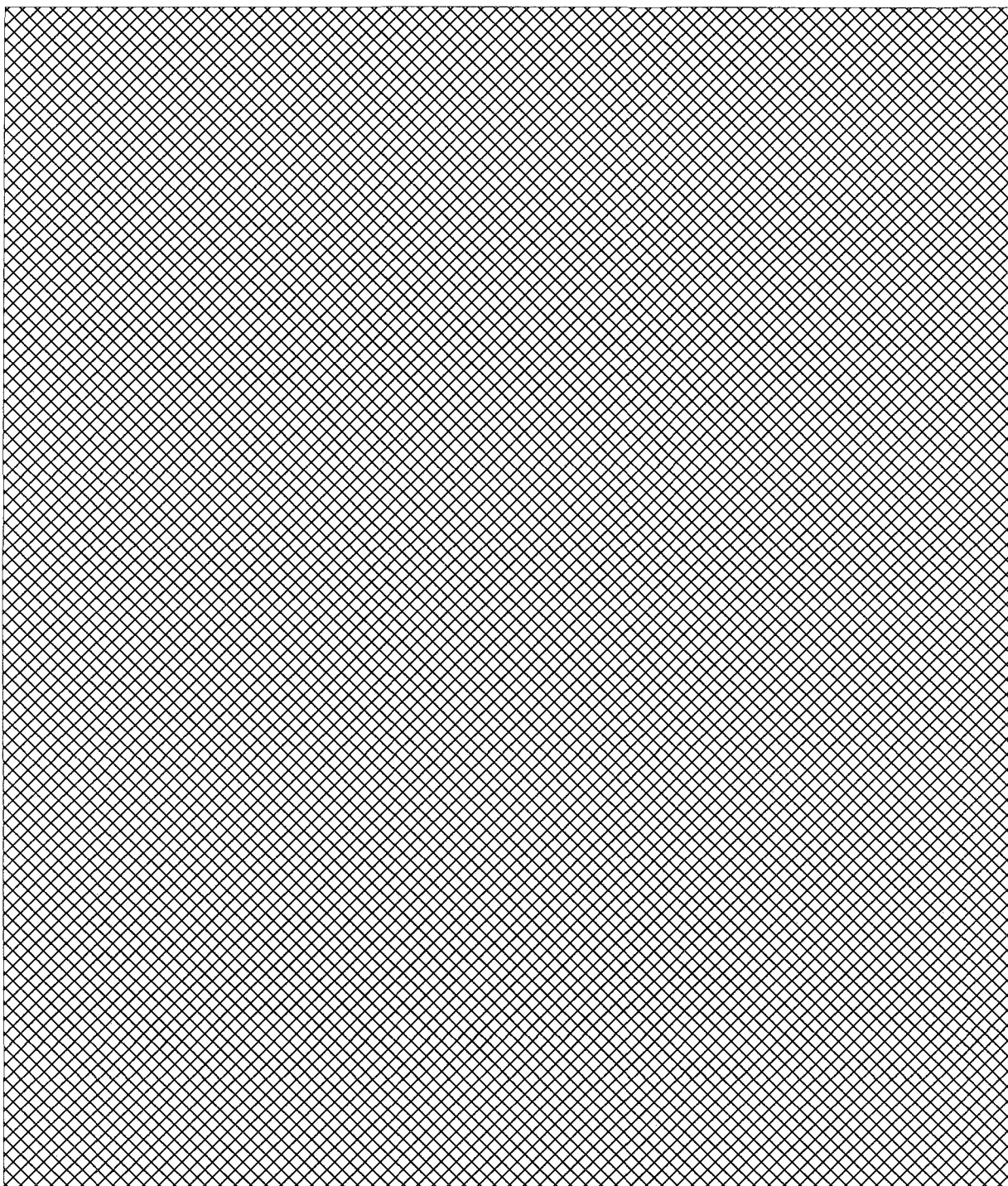


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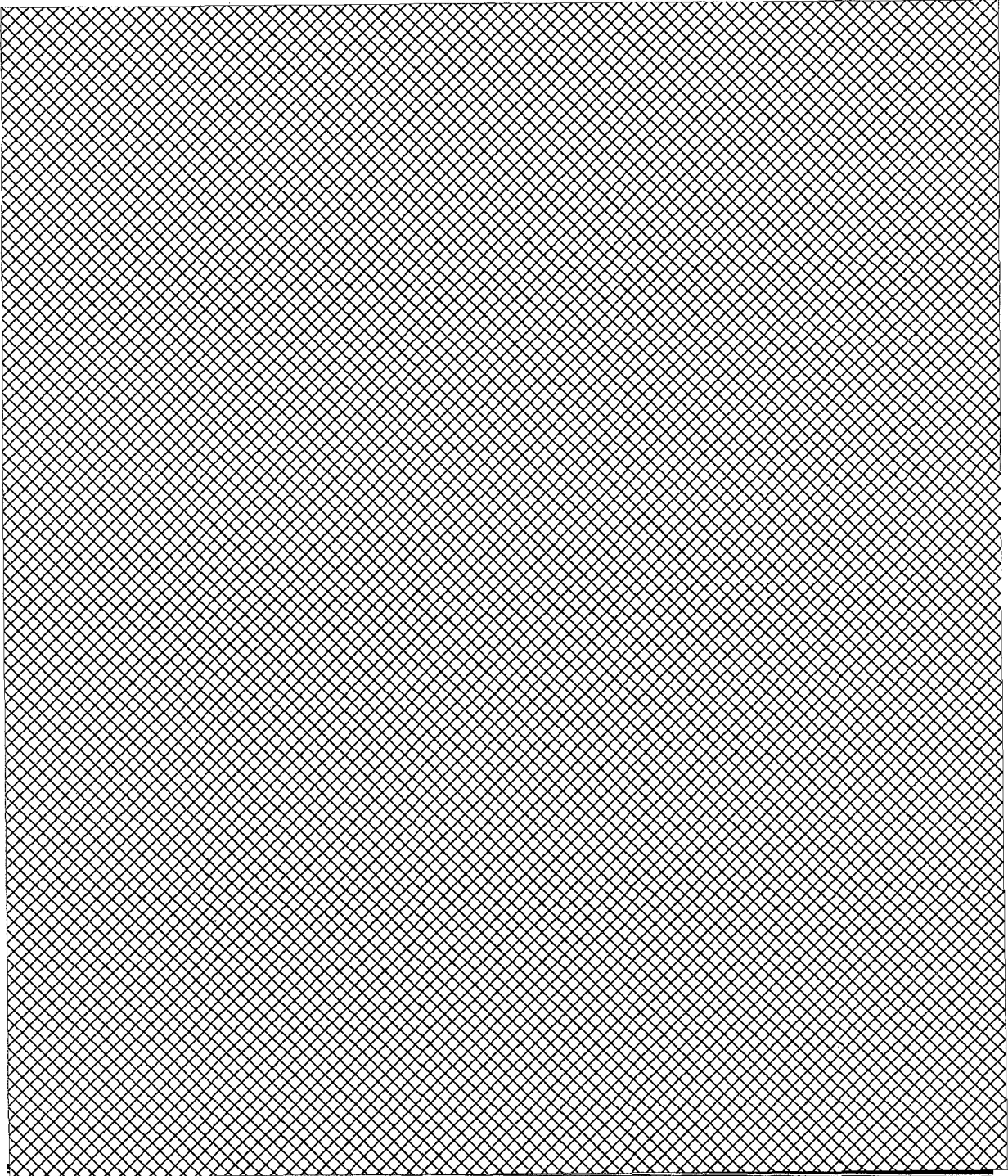
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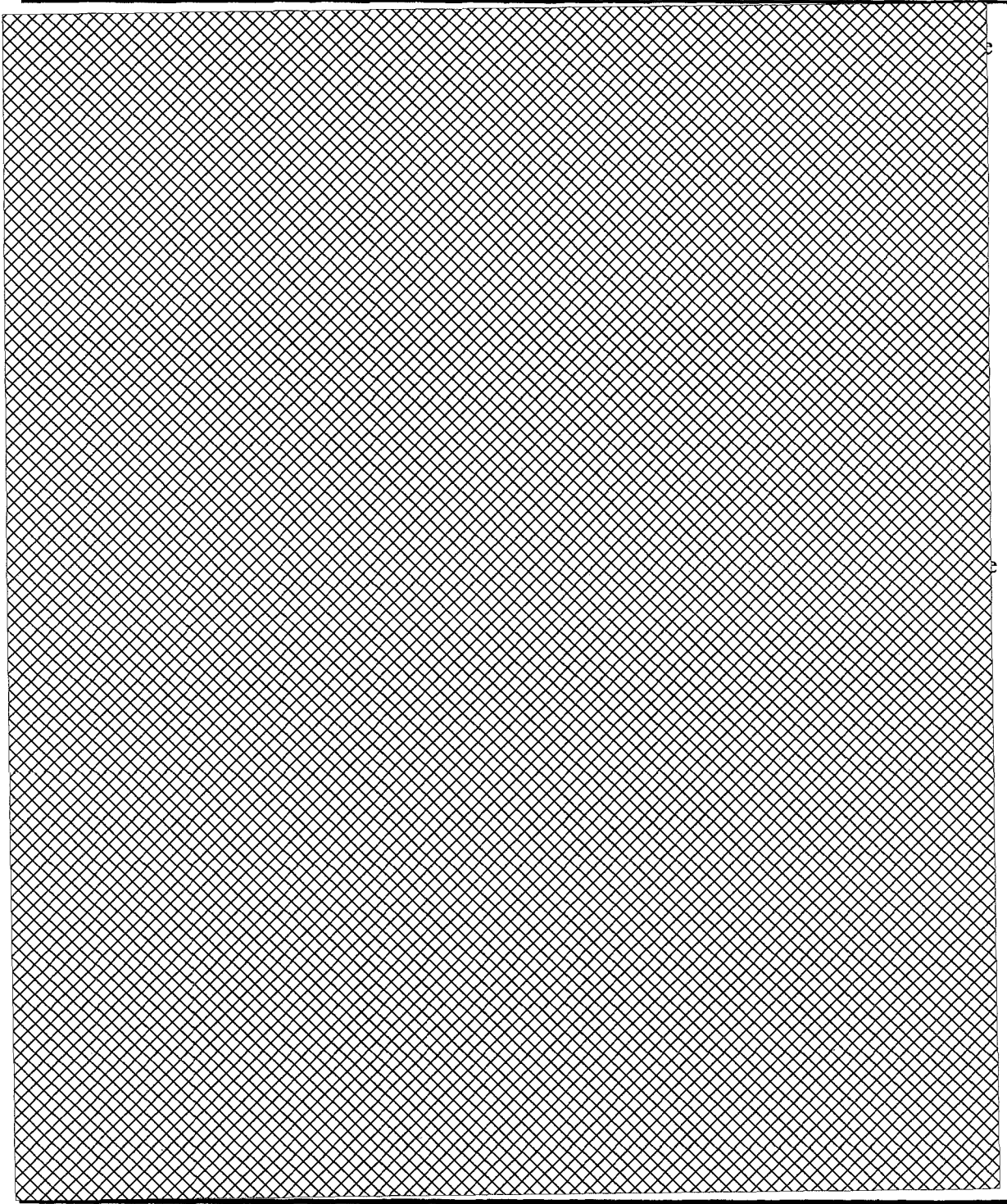
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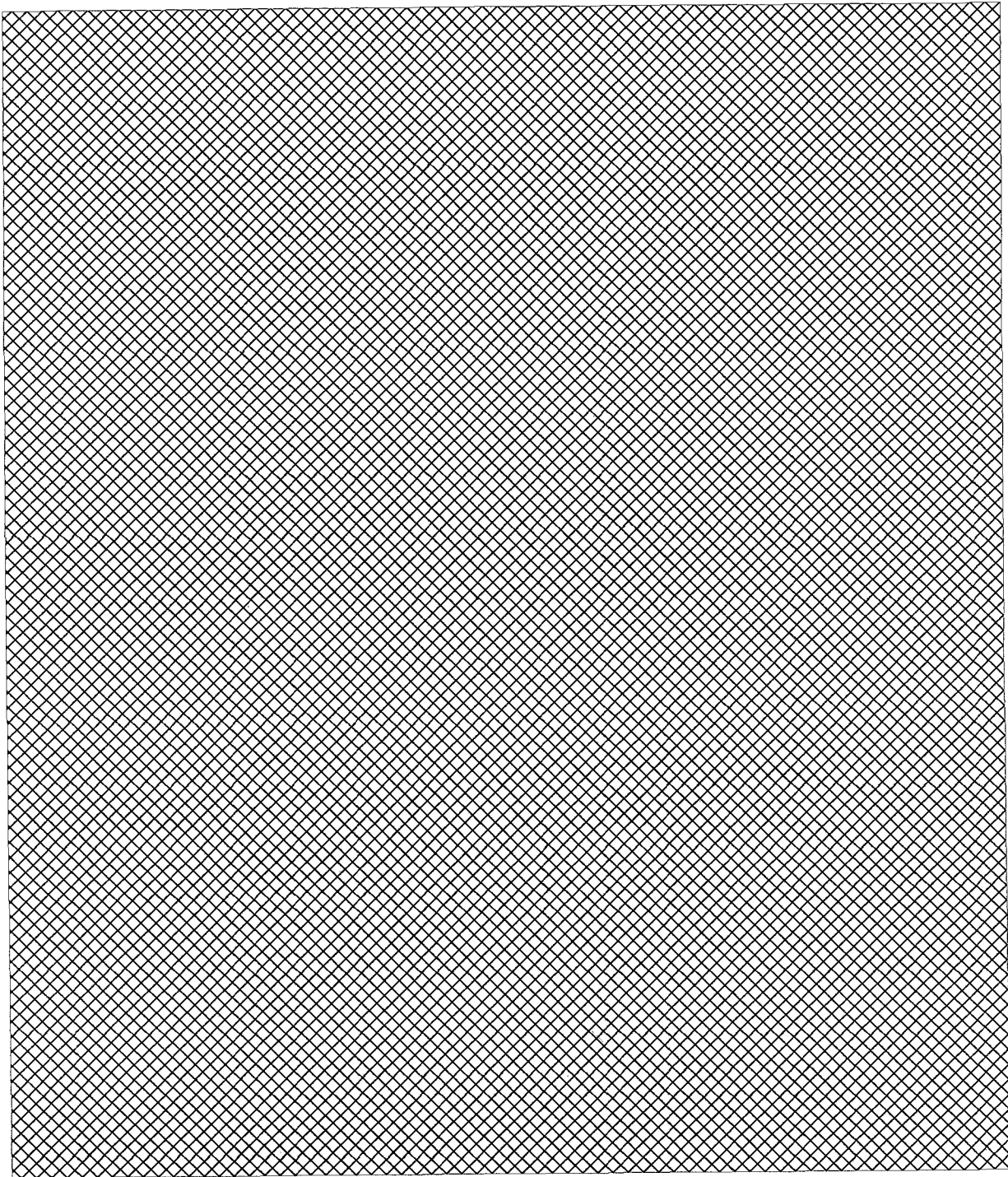


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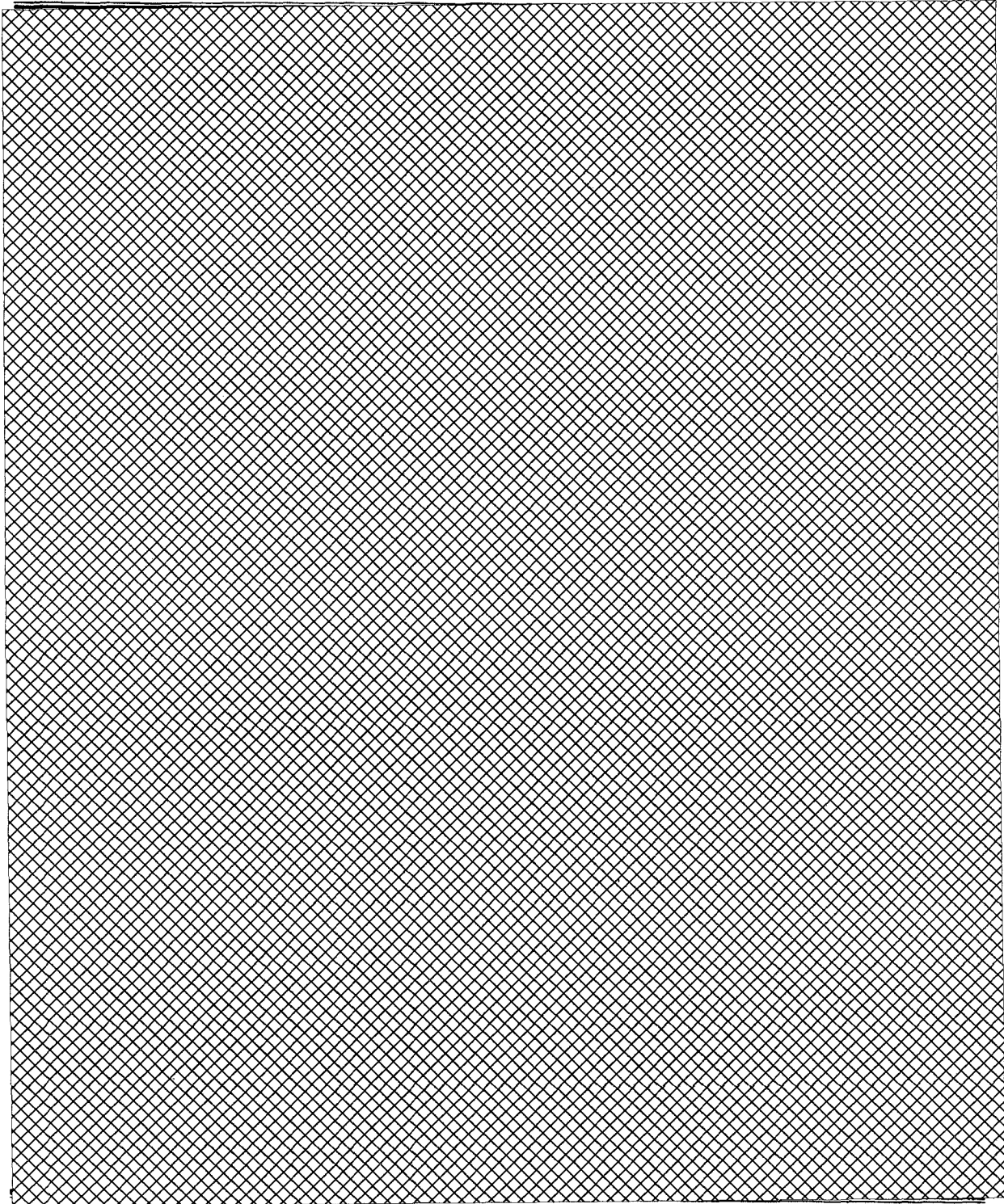
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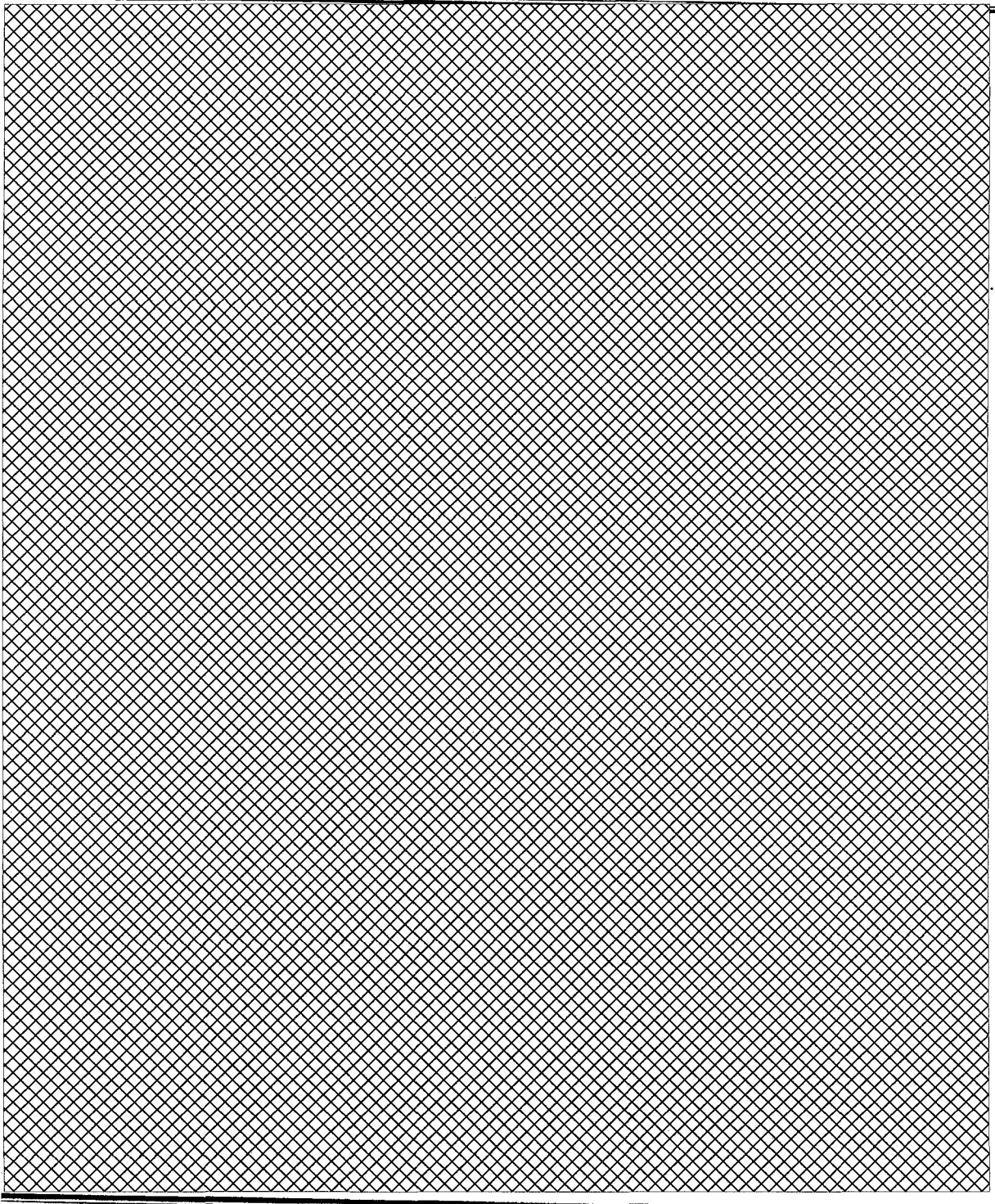
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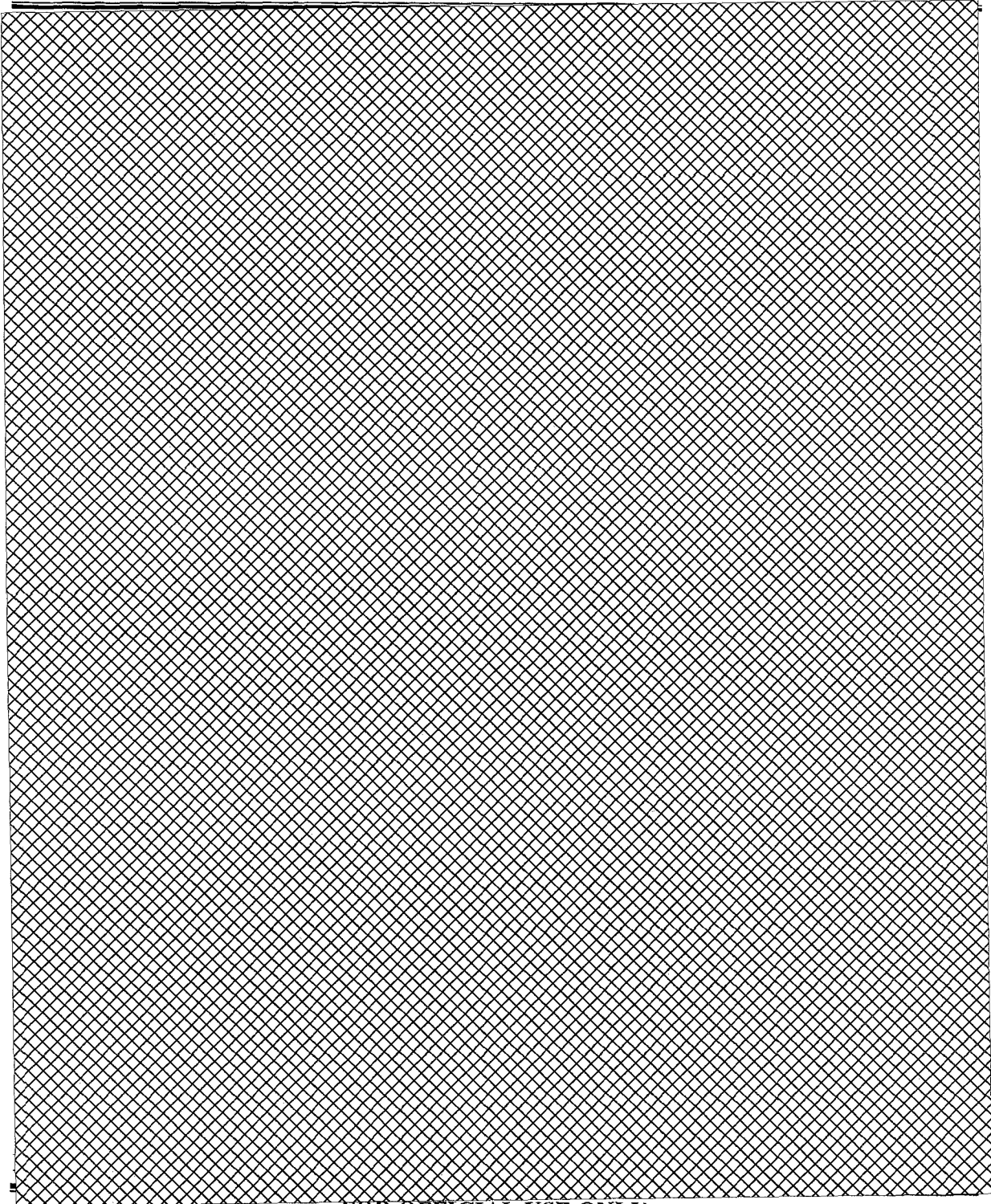
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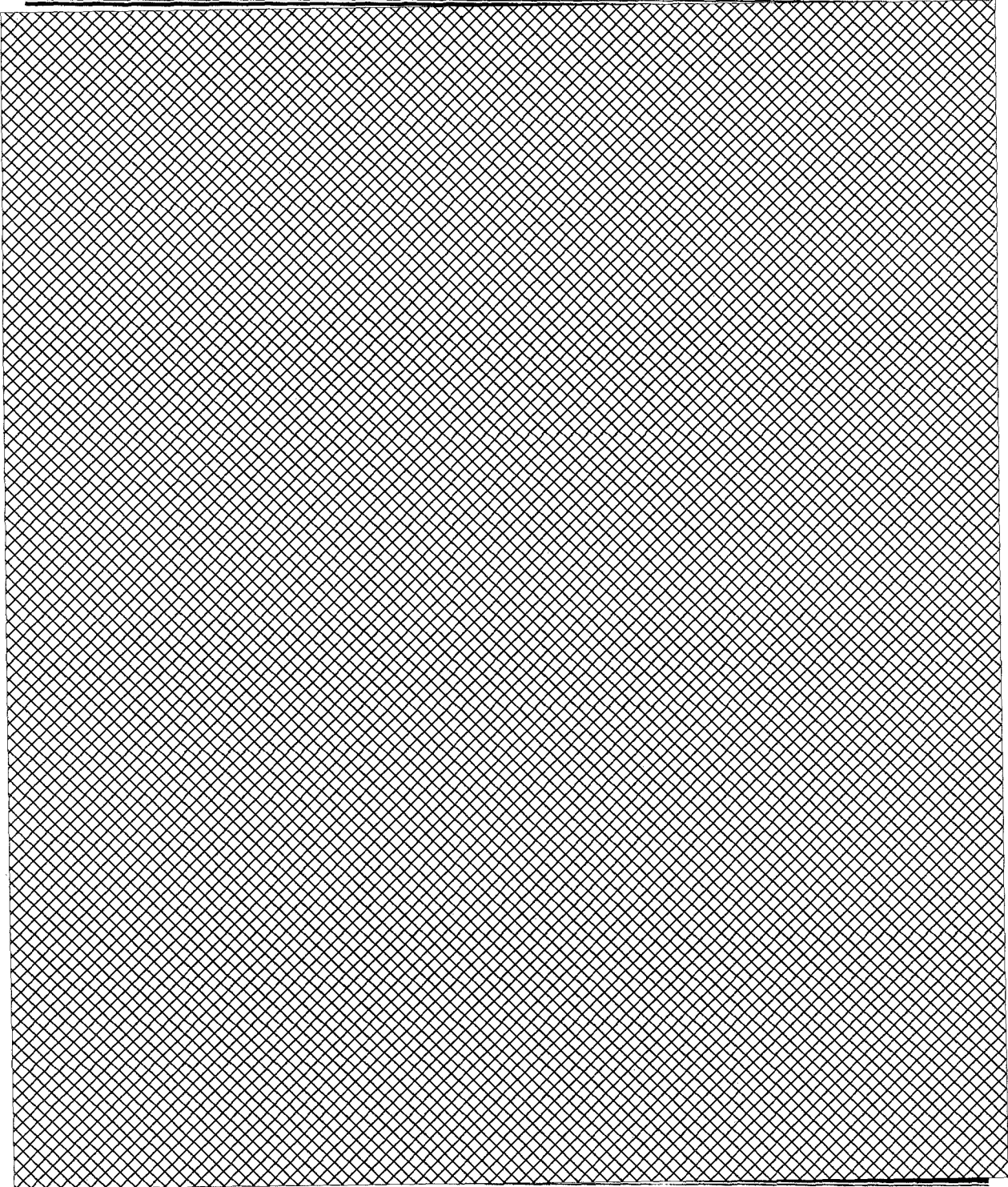
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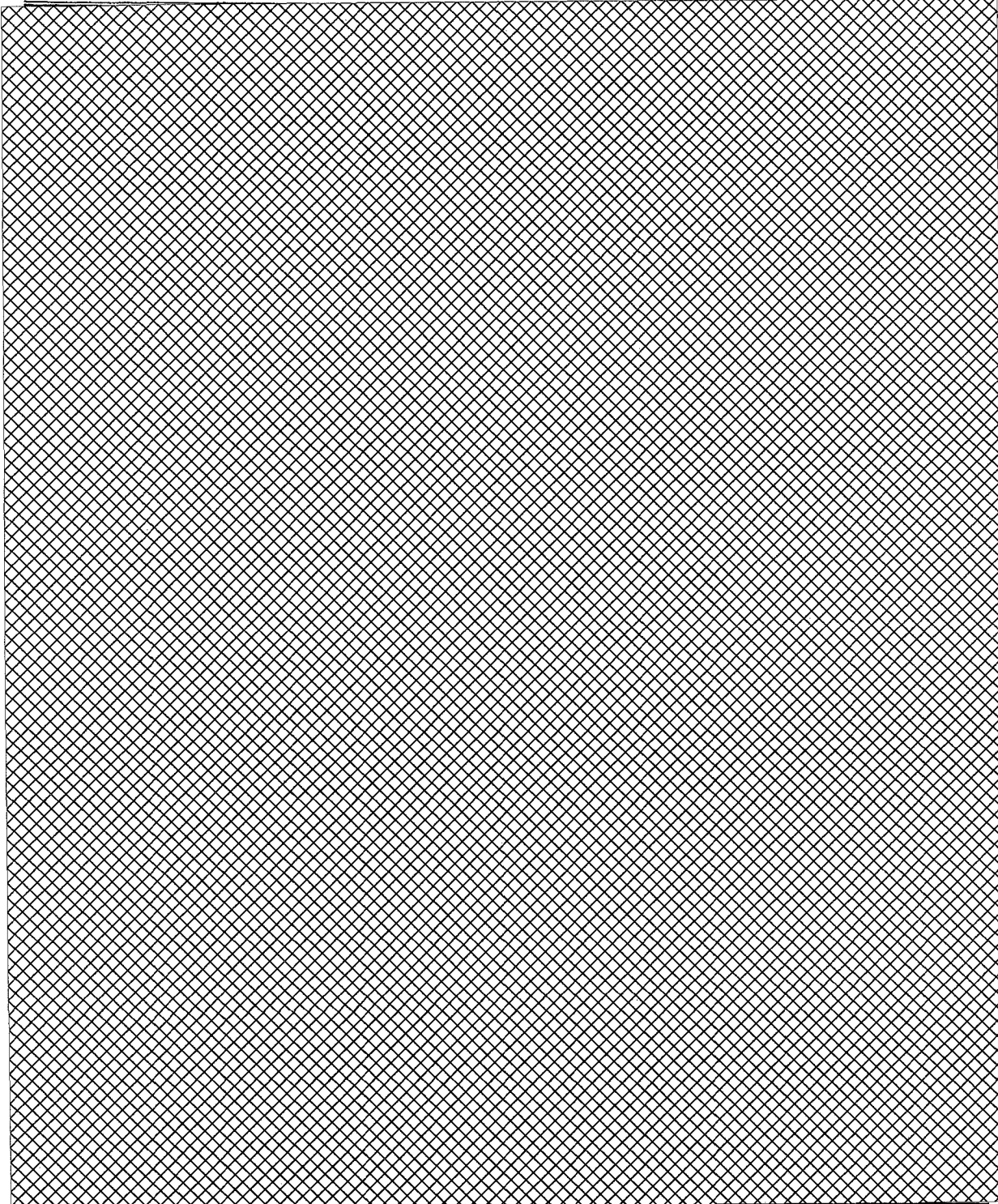
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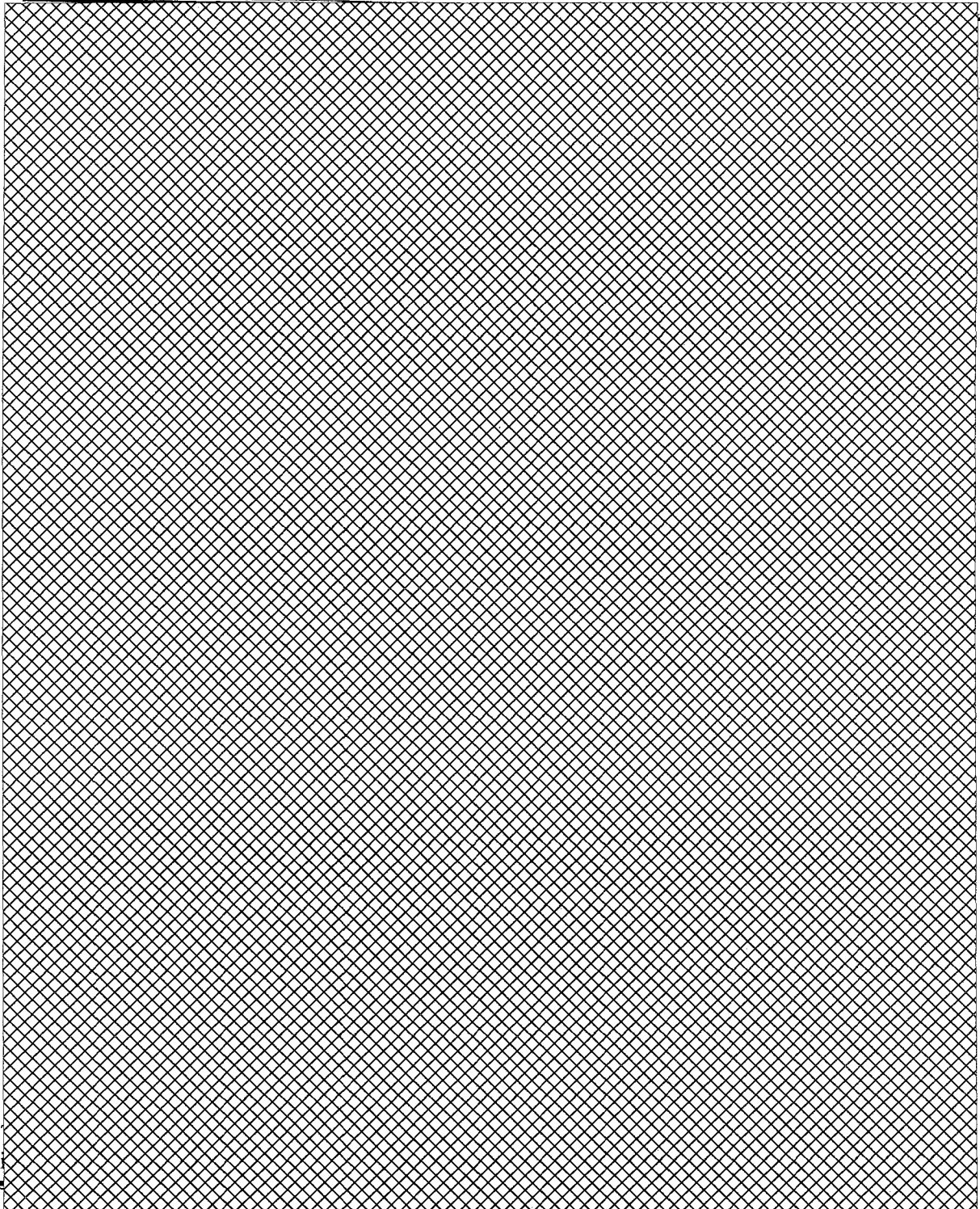
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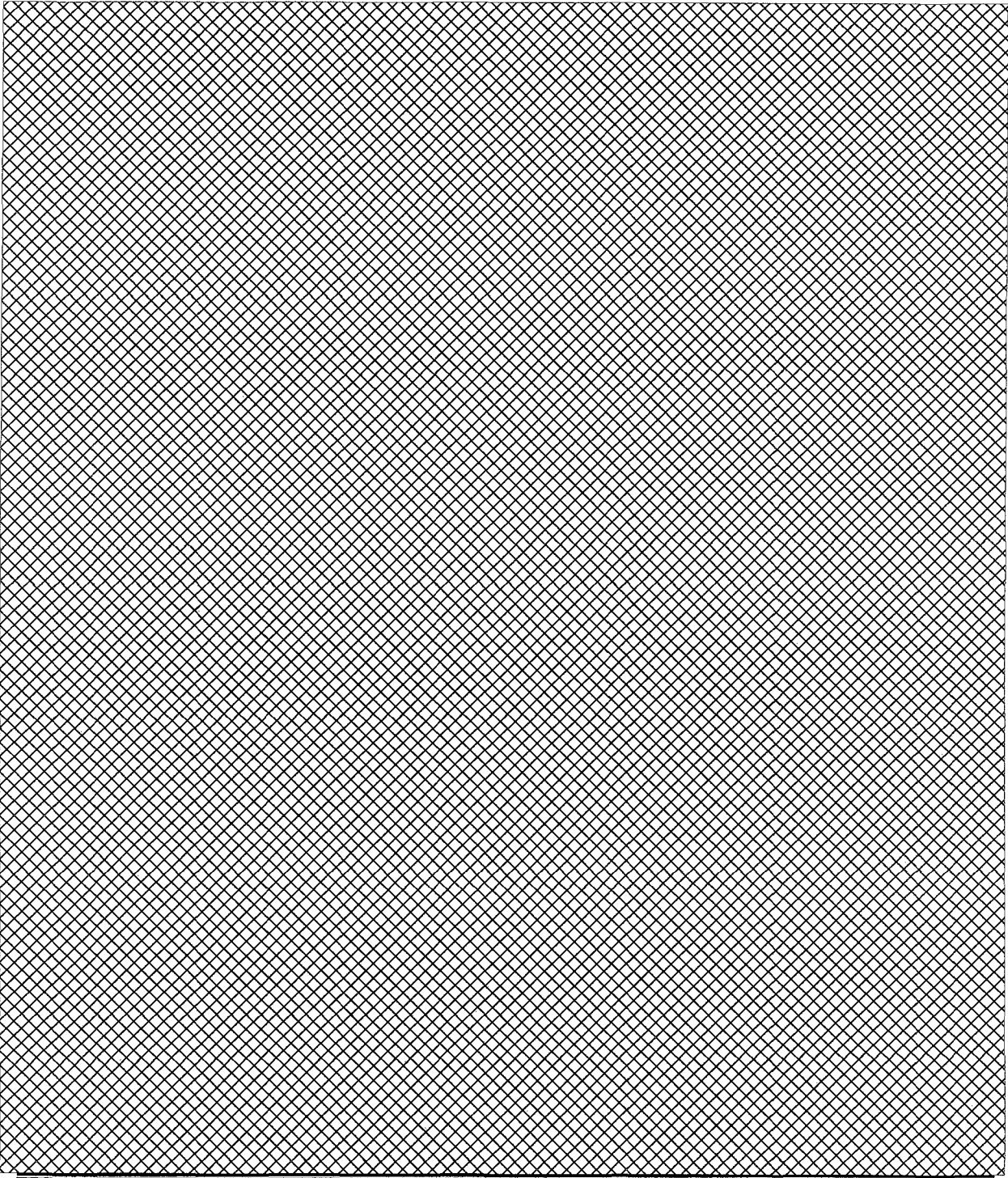


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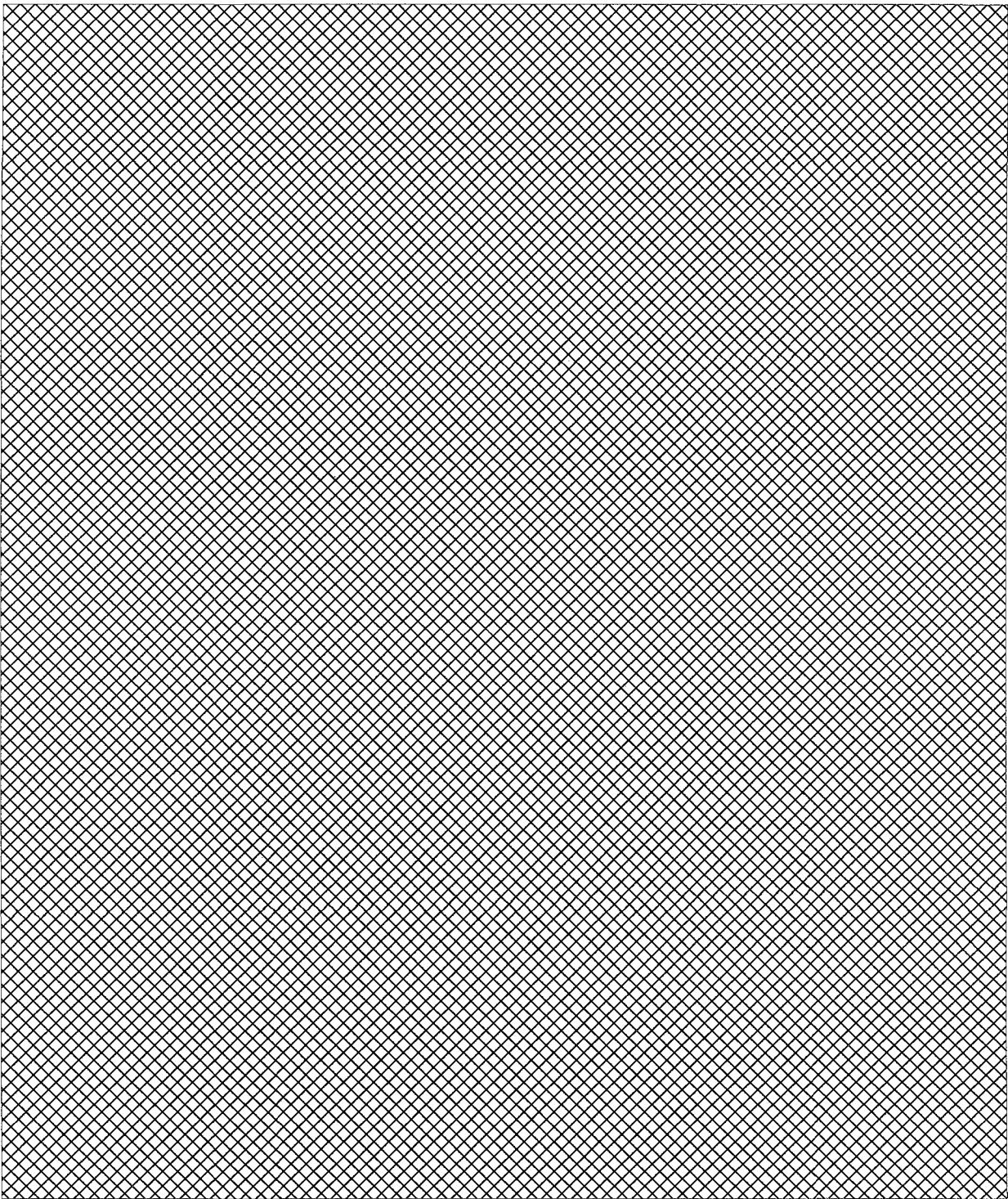


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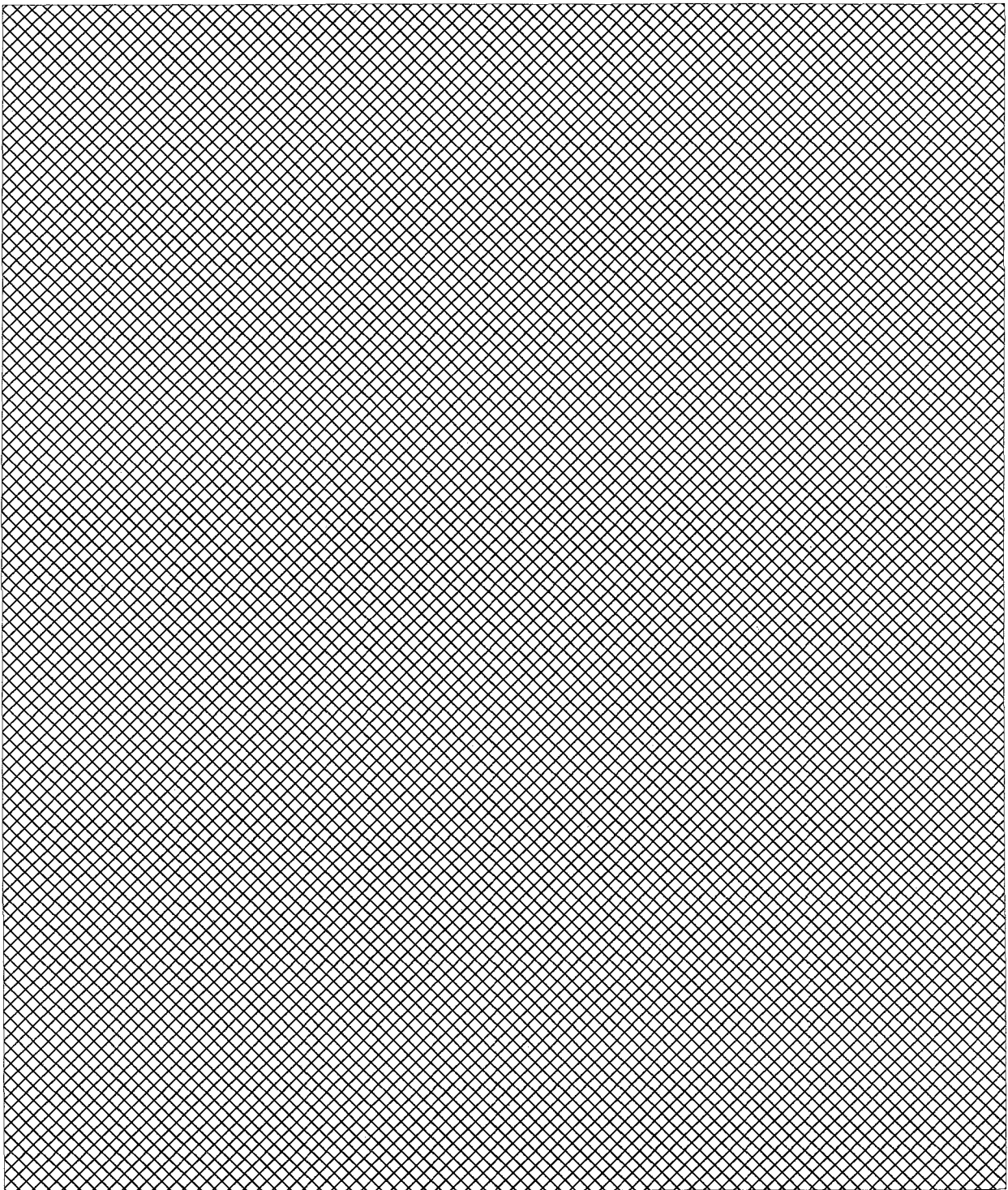
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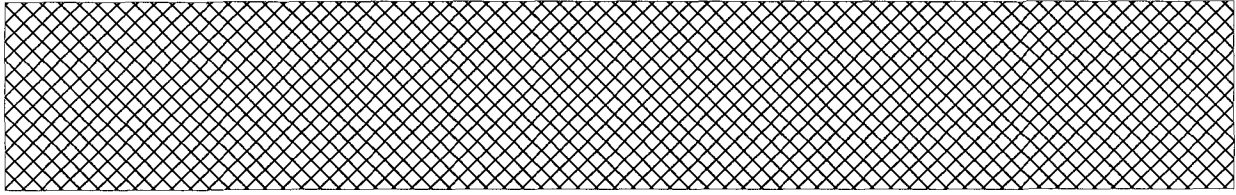
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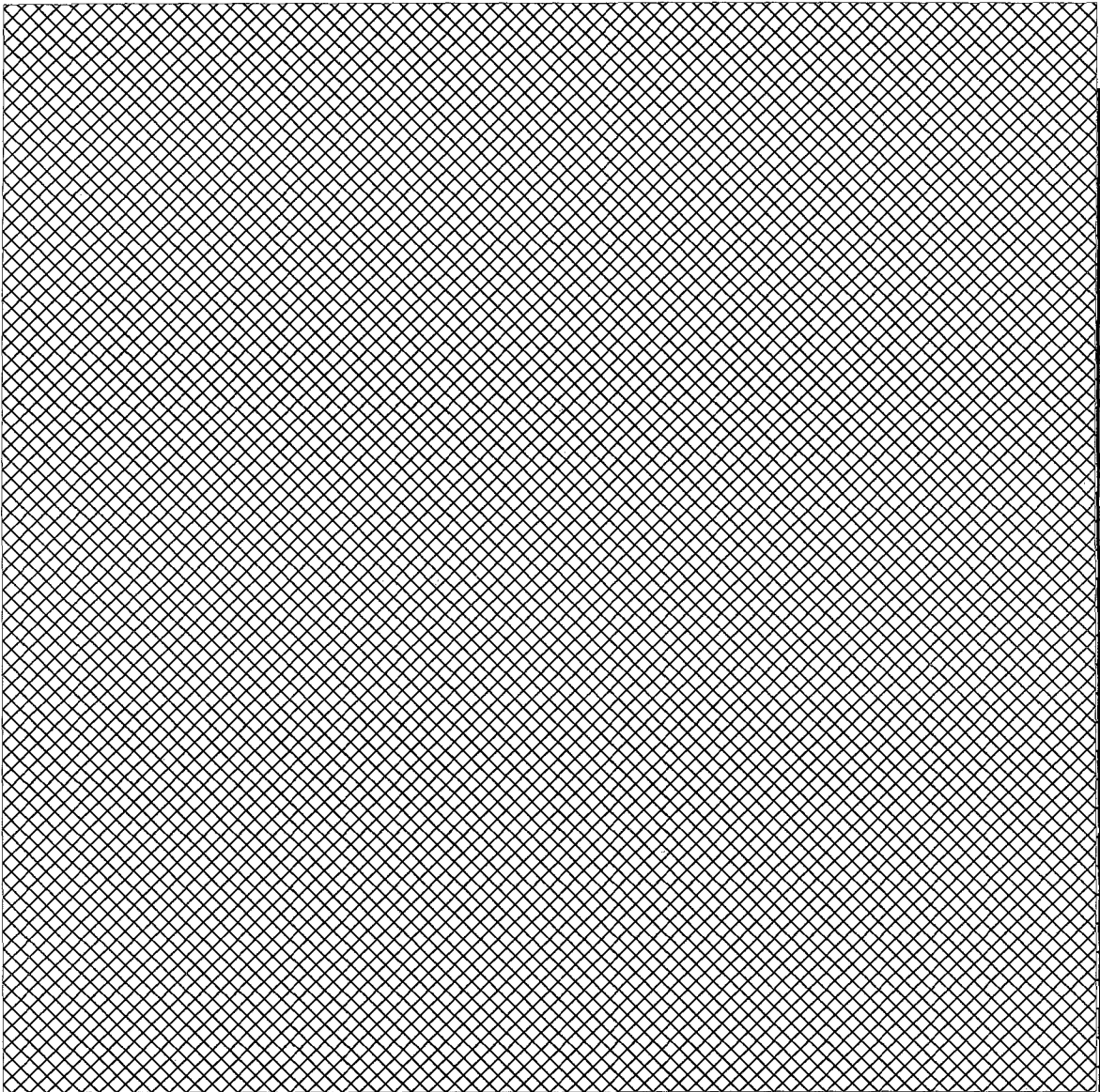


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**INFORMATION RESOURCES DIVISION**  
**DATA/INFORMATION MANAGEMENT SECTION**



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DATE 08-28-2007 BY 65179 dmh/bja/cal

9 October 2002 Draft, Version 2  
**FULL PRIVACY IMPACT ASSESSMENT**

**FOR THE INVESTIGATIVE DATA WAREHOUSE (IDW)**  
**AND VIRTUAL KNOWLEDGE BASE (VKB)**

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10/15/2002

Revision 2

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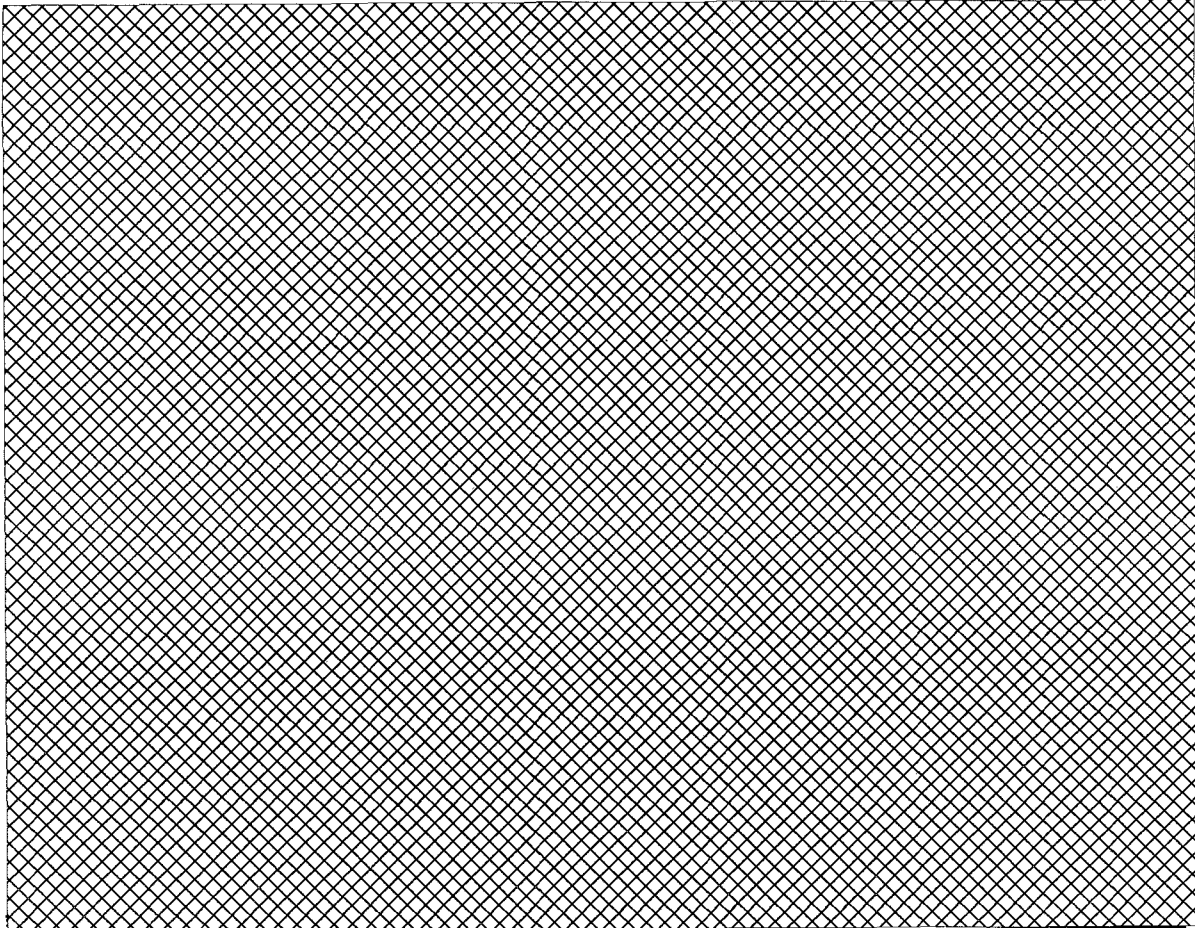
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Investigative Data Warehouse (IDW) Virtual Knowledge Base (VKB)

Full Privacy Impact Assessment, MIOG 16-21.3

**Executive Summary**

This full Privacy Impact Assessment (PIA) is submitted by the Information Resources Division in accordance with MIOG 16-21.3, *Completing a Privacy Impact Assessment*, and MIOG 16-21.5, Paragraphs A, B, C, and D. This assessment is intended to address MIOG requirements for the enterprise Investigative Data Warehouse (IDW) and Virtual Knowledge Base (VKB), and is submitted in coordination with Office of General Counsel for approval.



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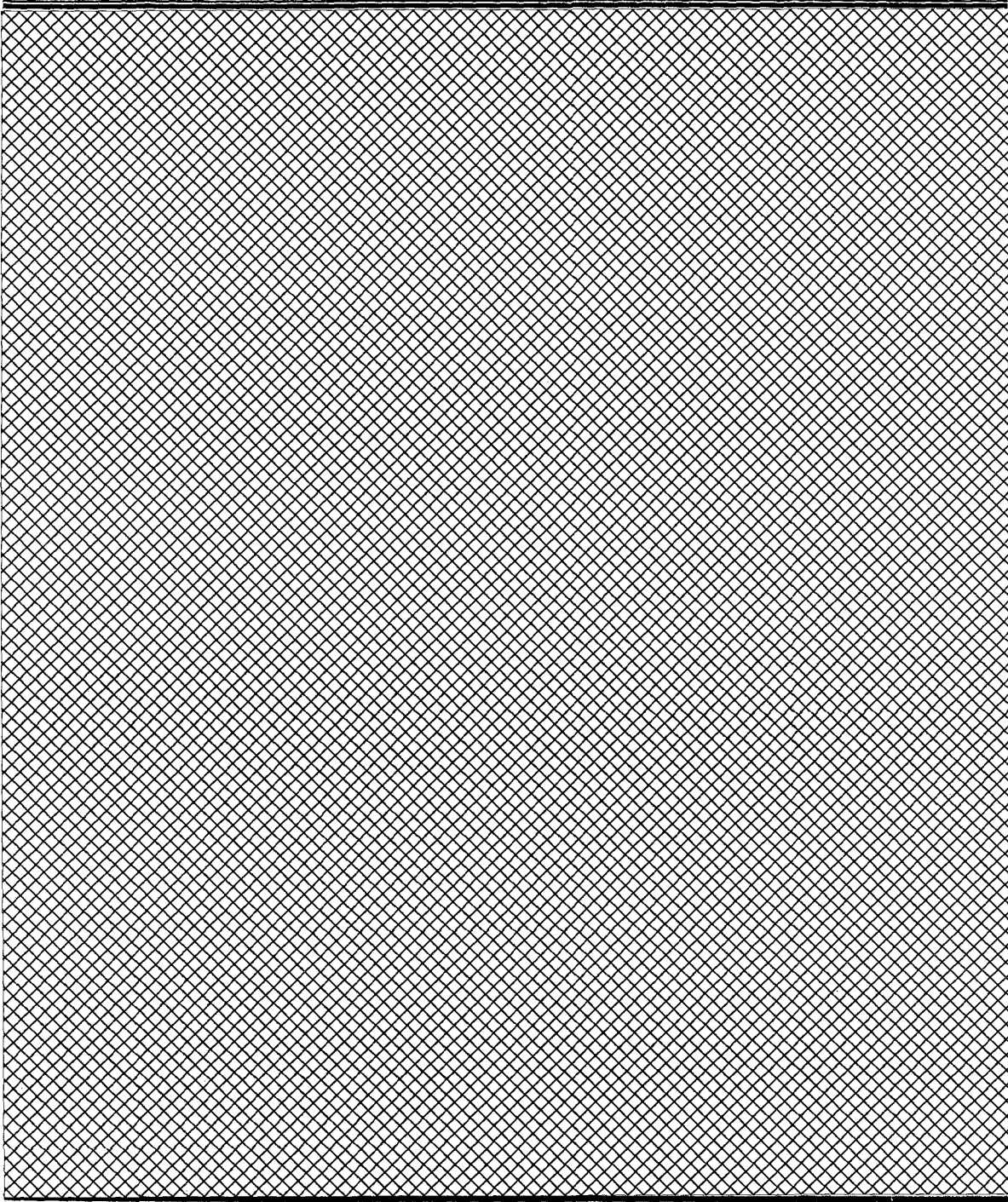
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Page 1

Revision 2

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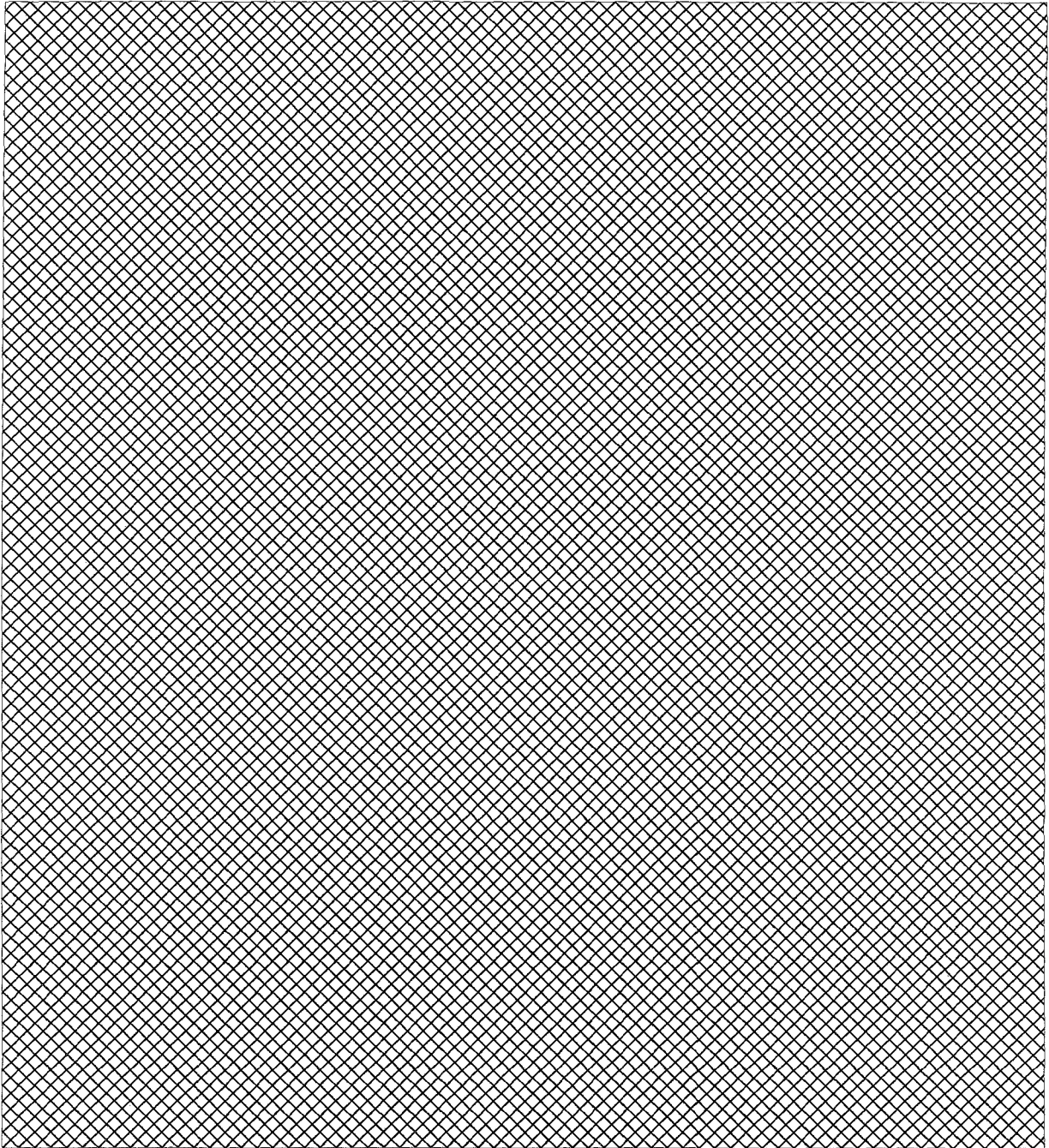
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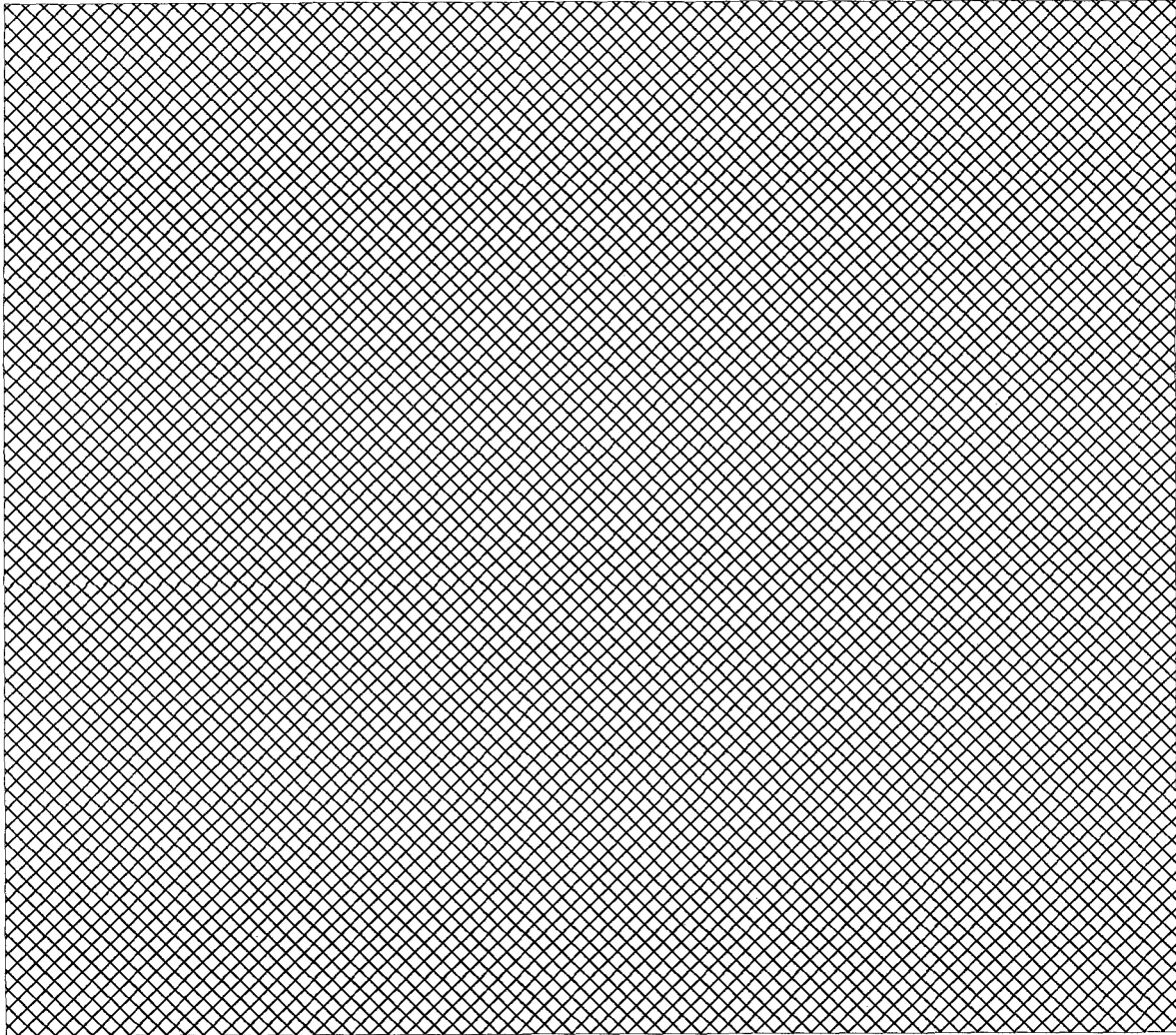
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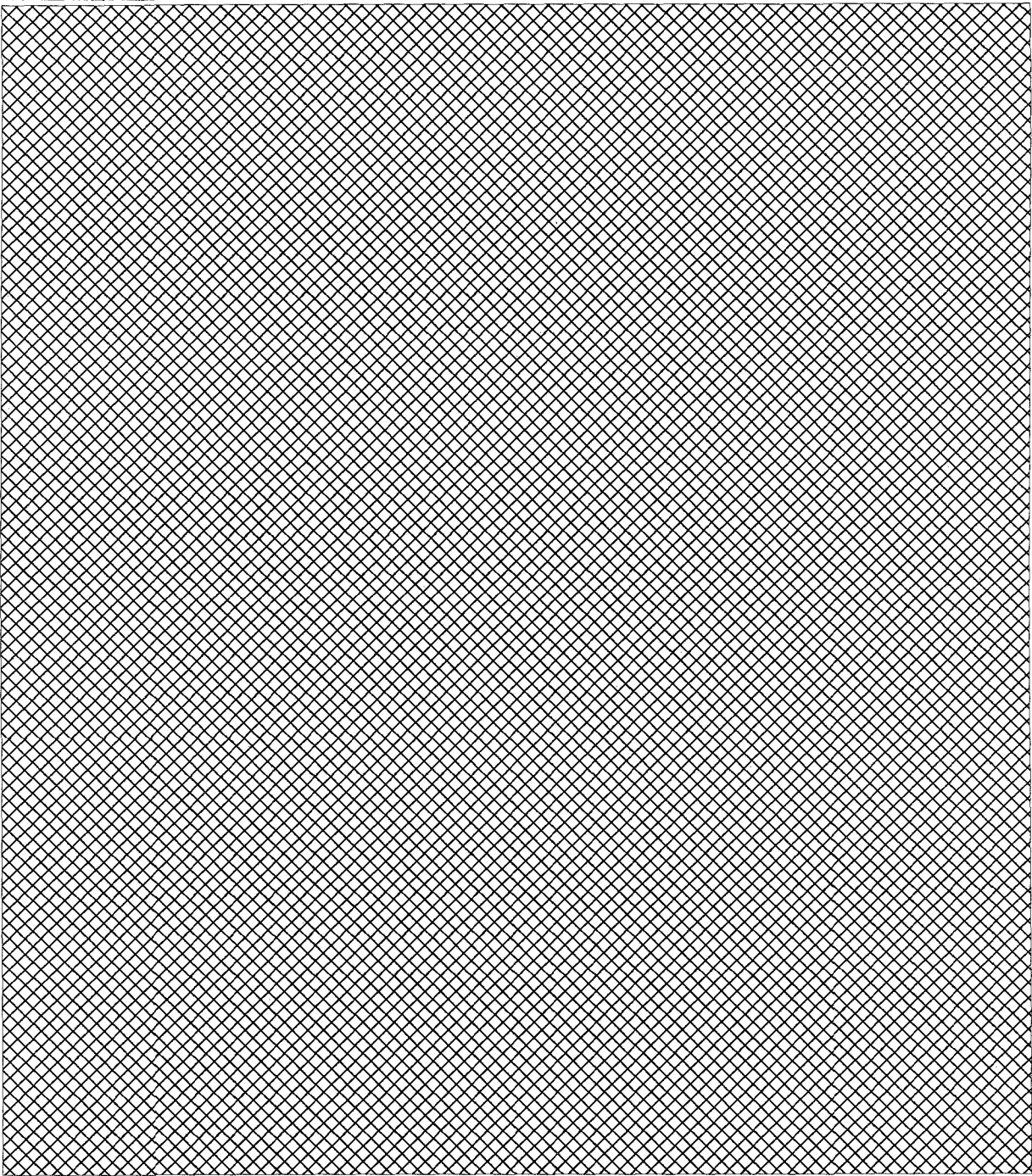
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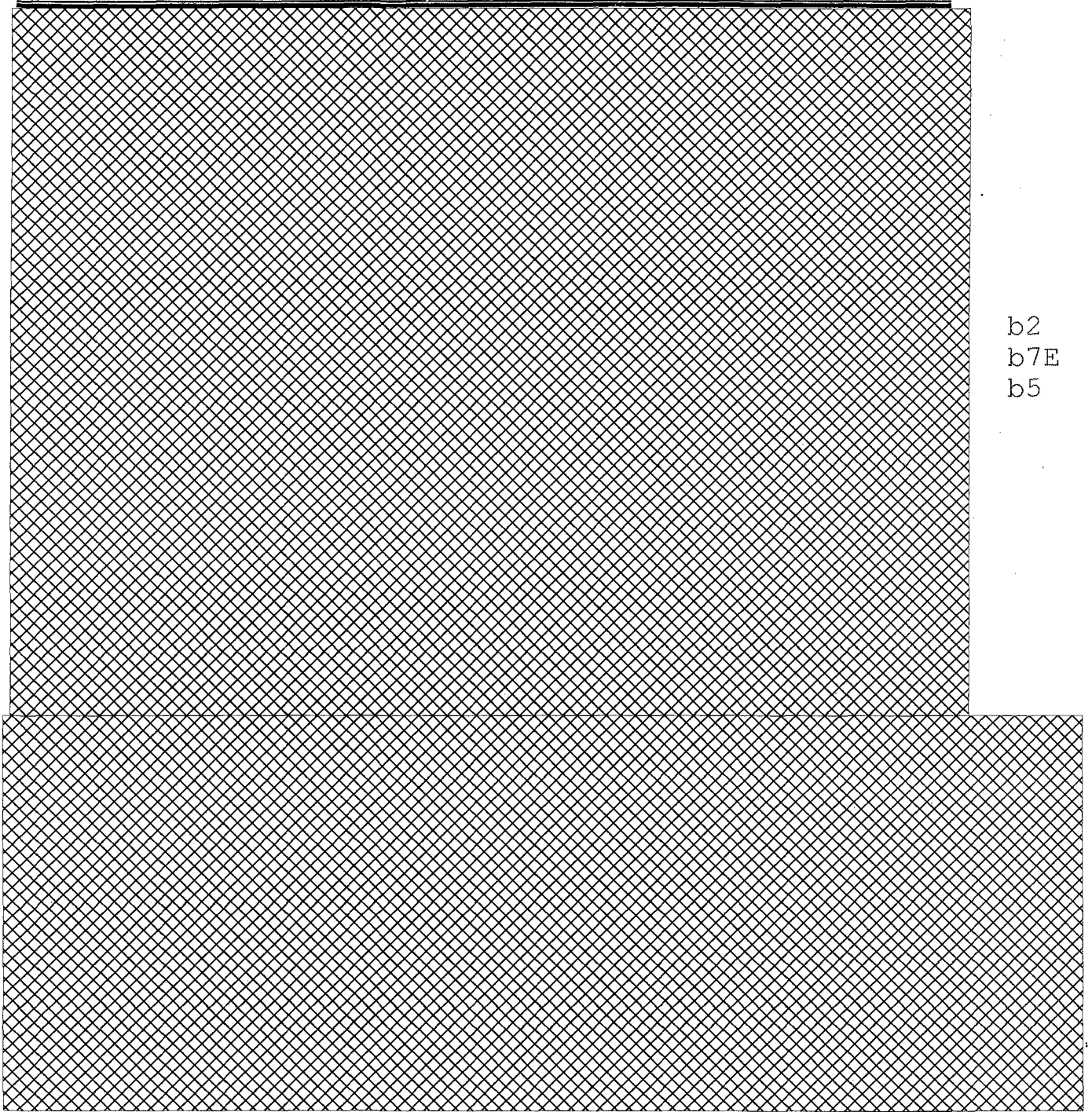
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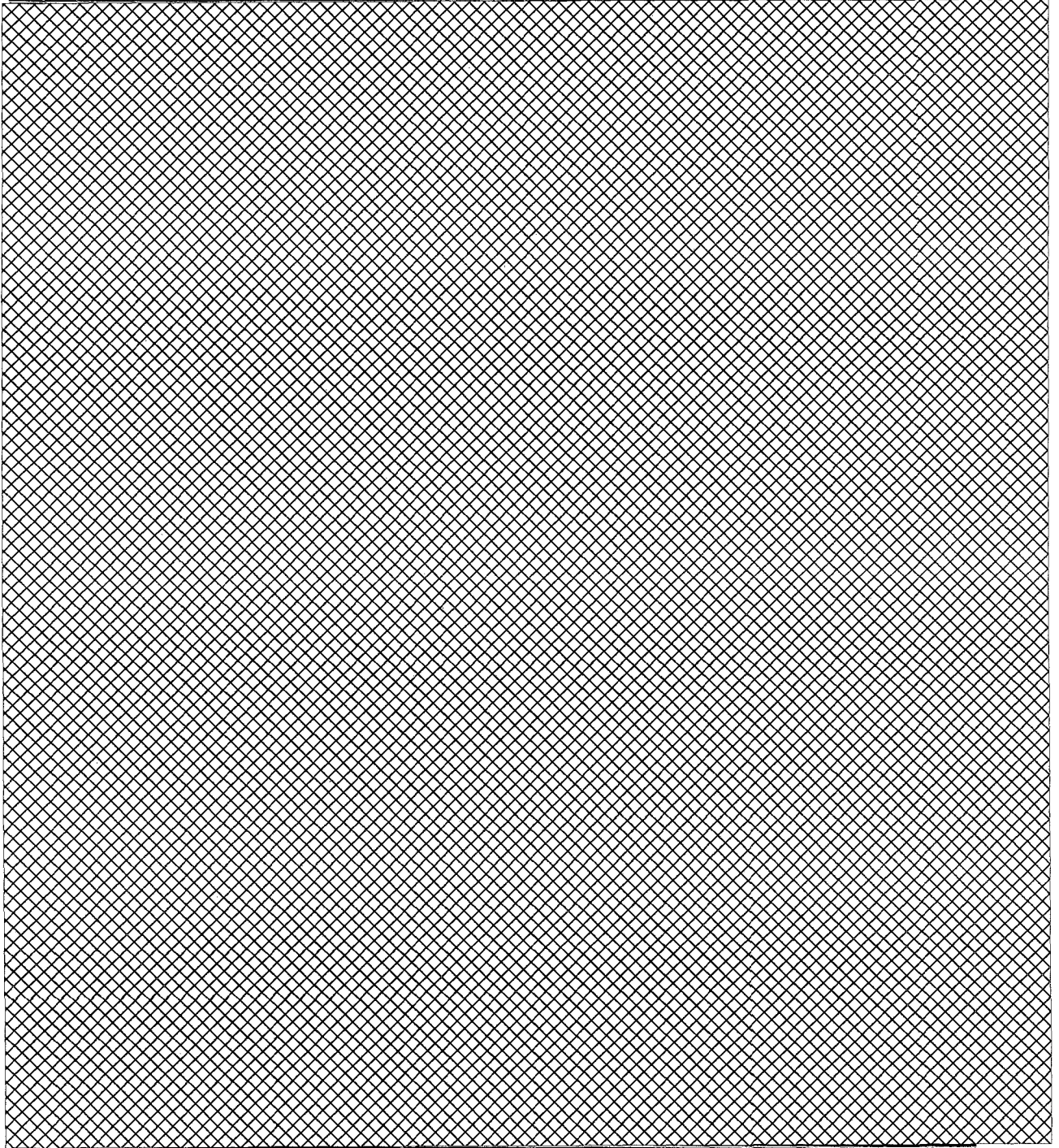
*10/15/2002*

*Page 6*

*Revision 2*

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*10/15/2002*

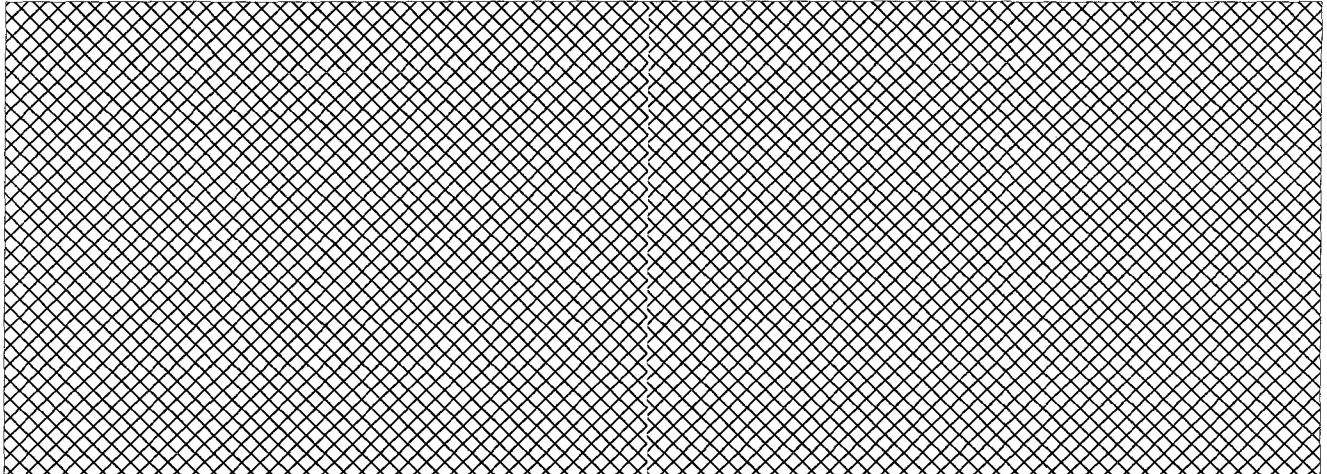
*Page 7*

*Revision 2*

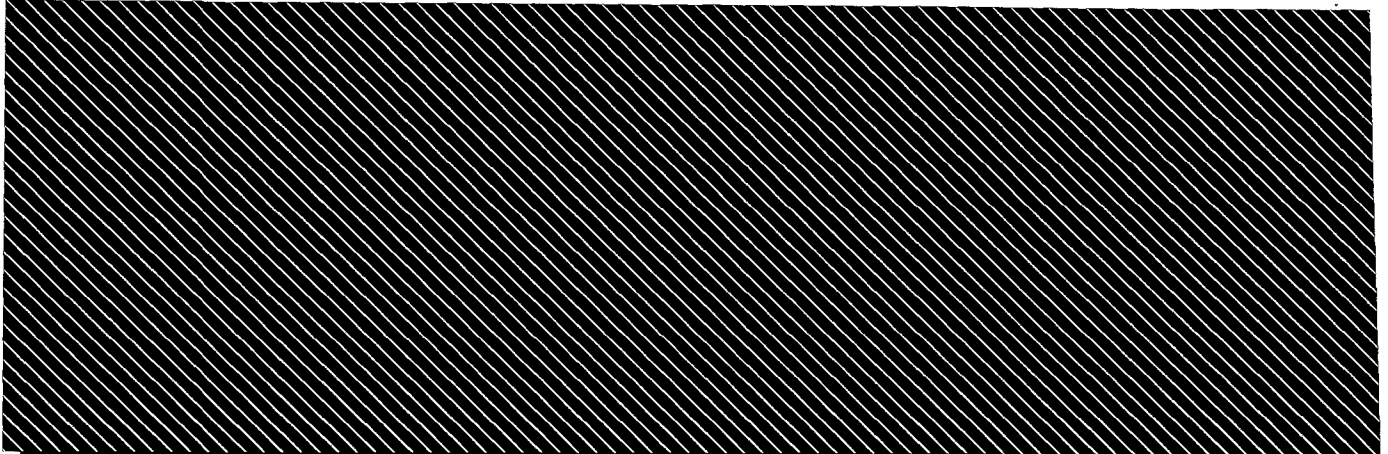
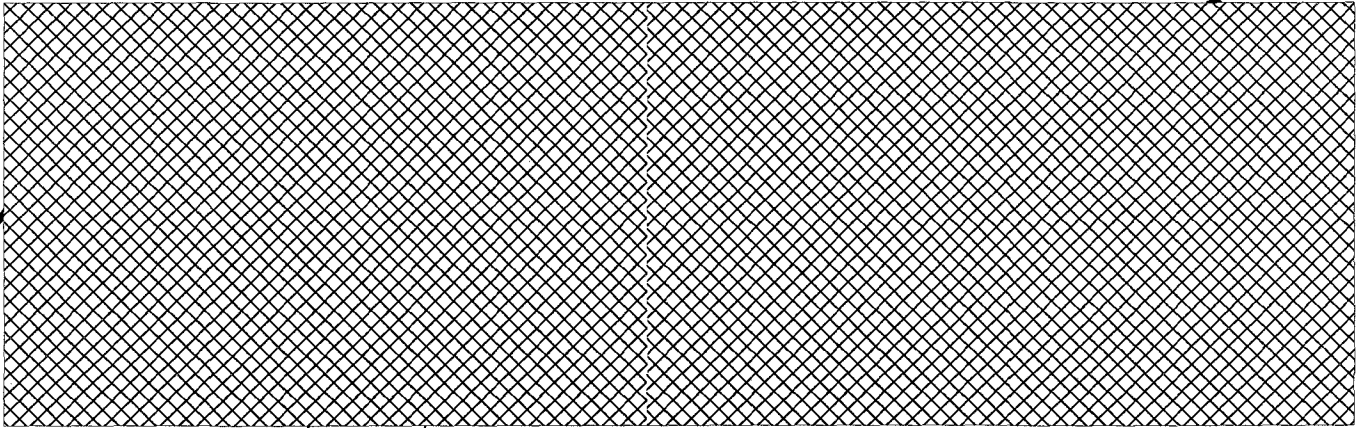
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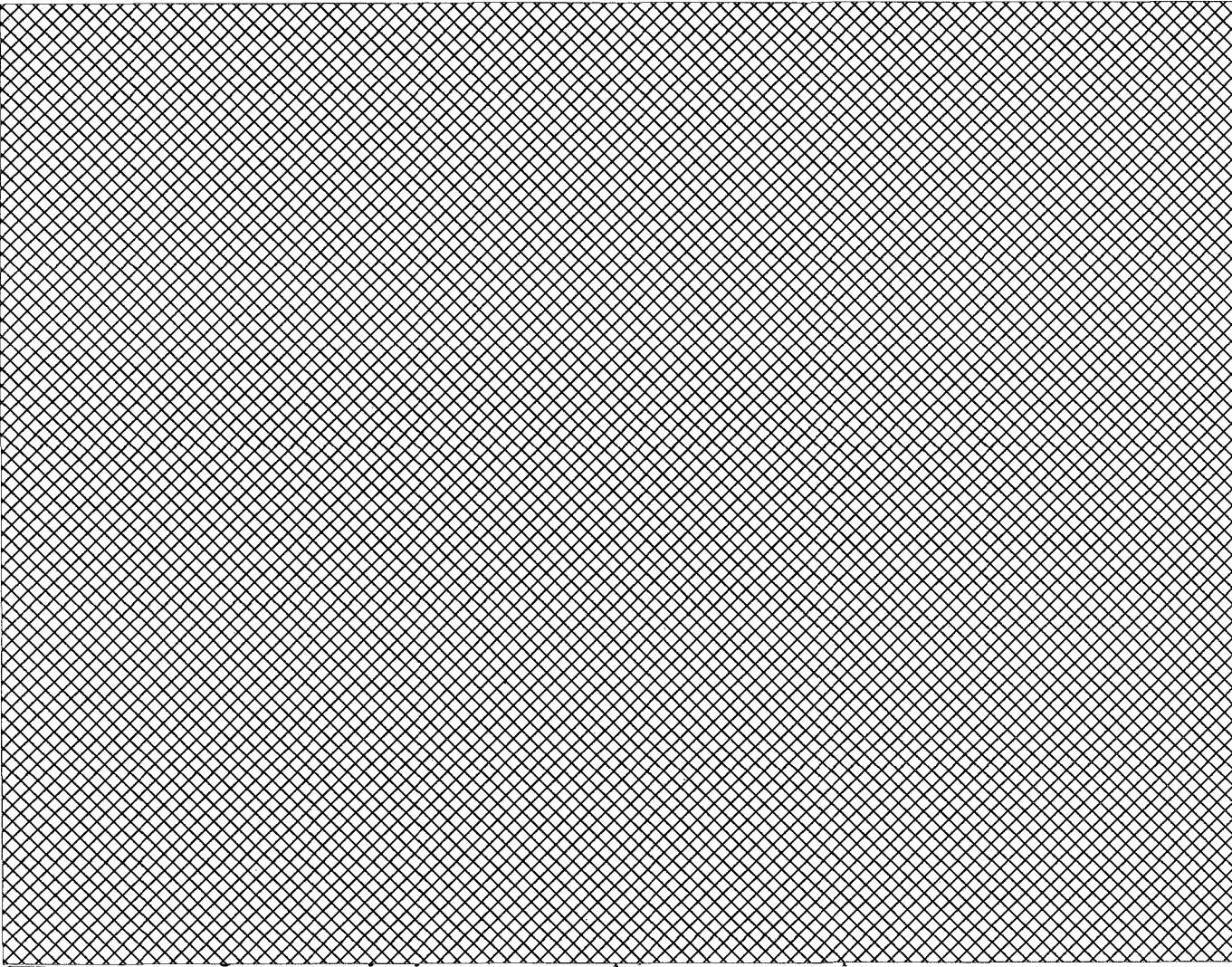
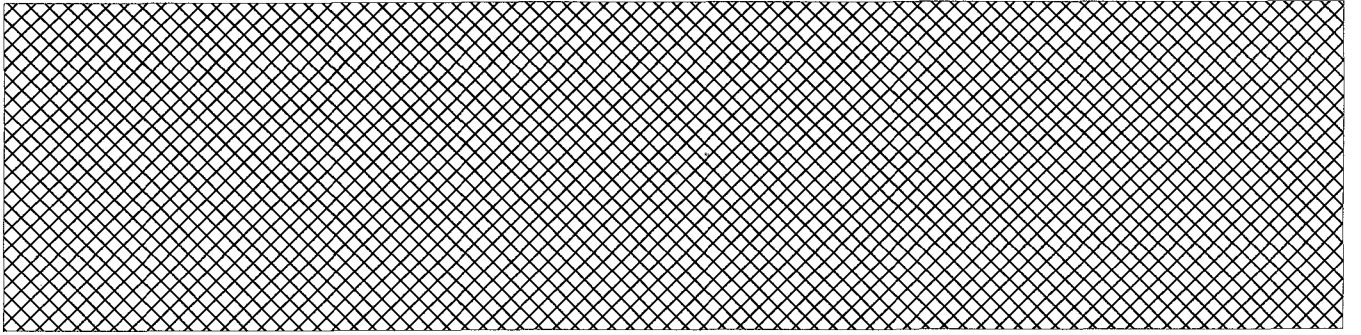
10/15/2002

Page 8

Revision 2

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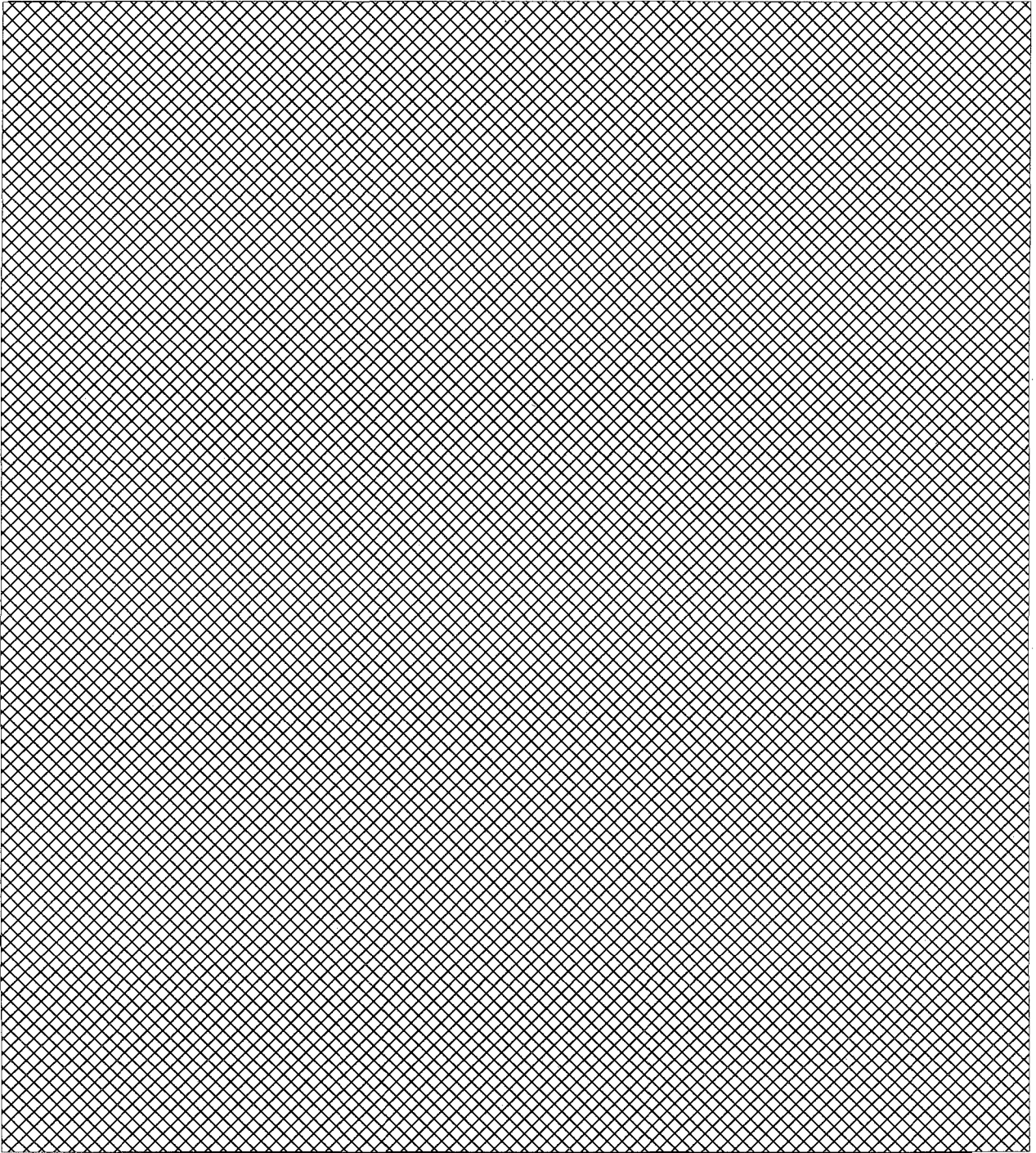
10/15/2002

Page 9

Revision 2

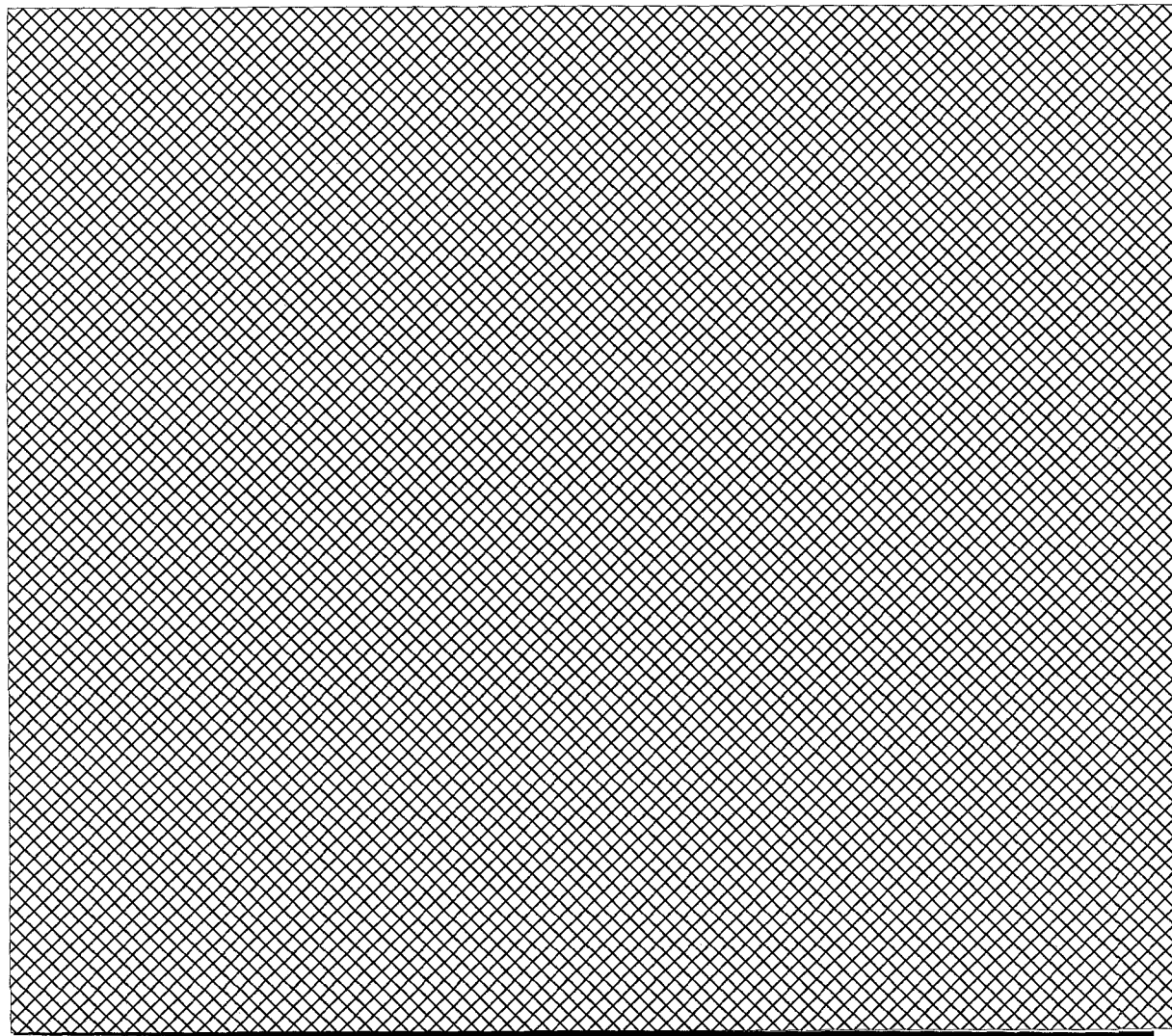
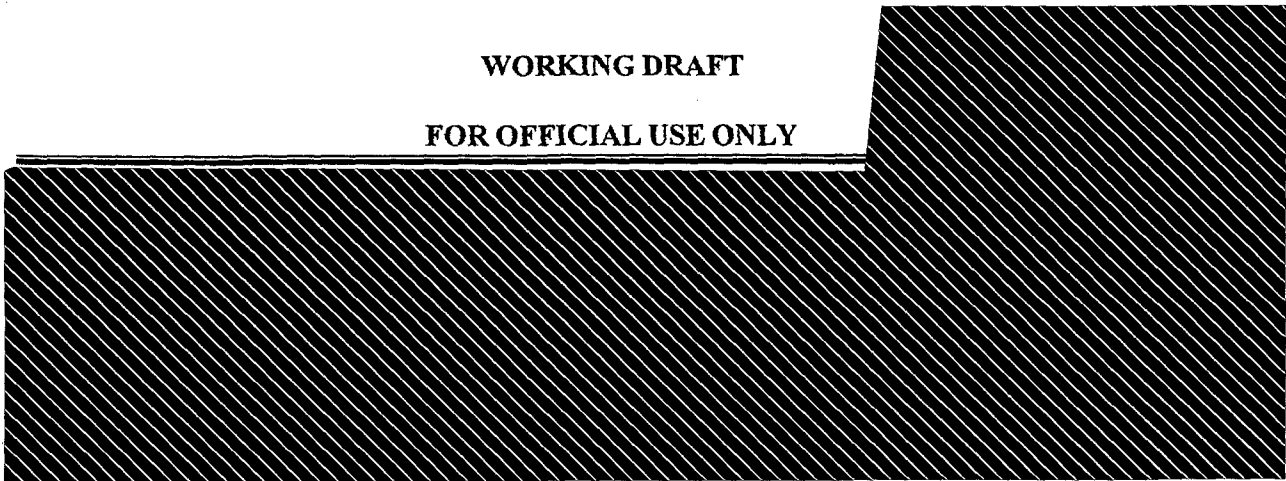
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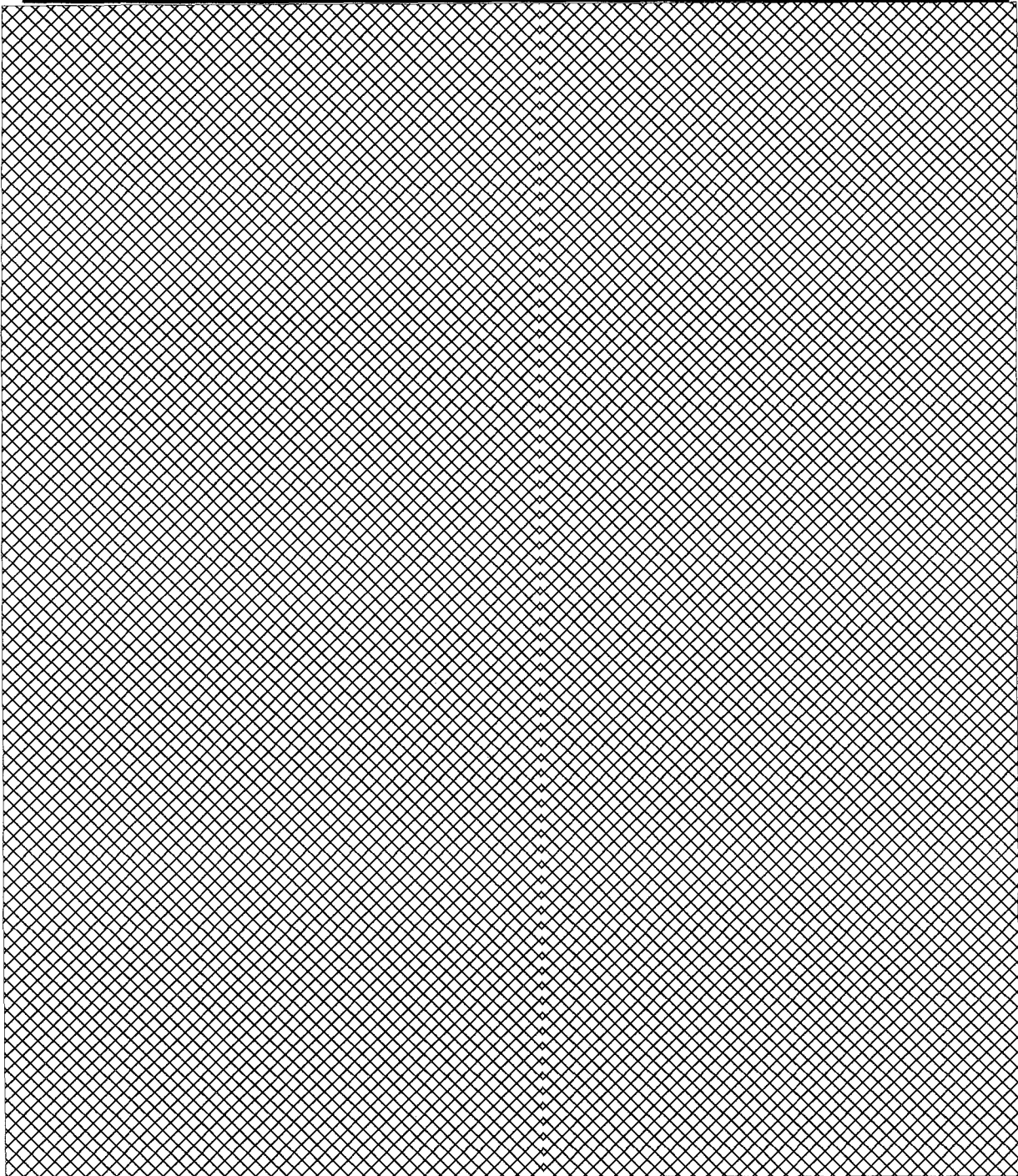


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*10/15/2002*

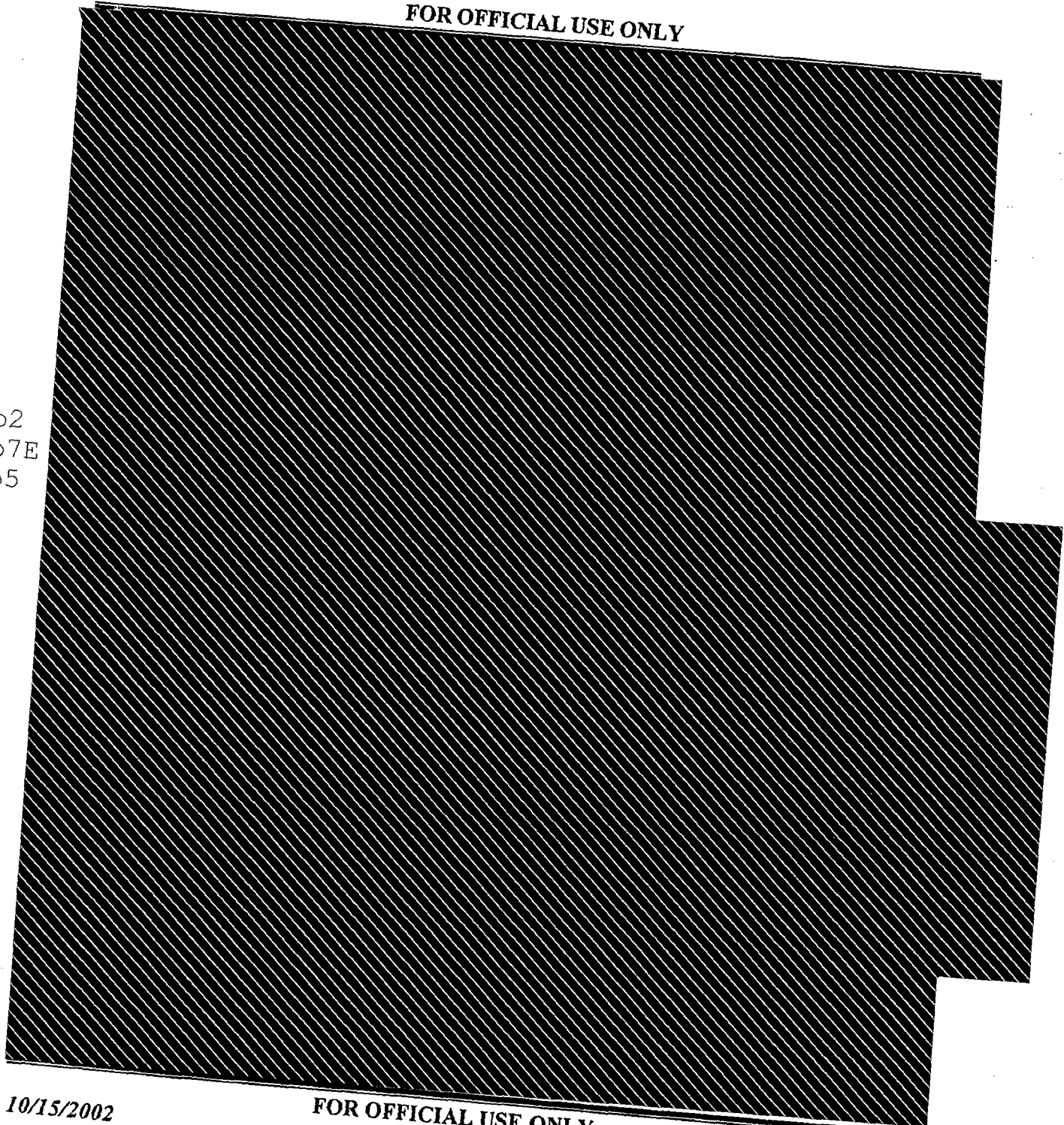
*Page 12*

Revision 2

**WORKING DRAFT**

**FOR OFFICIAL USE ONLY**

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10/15/2002

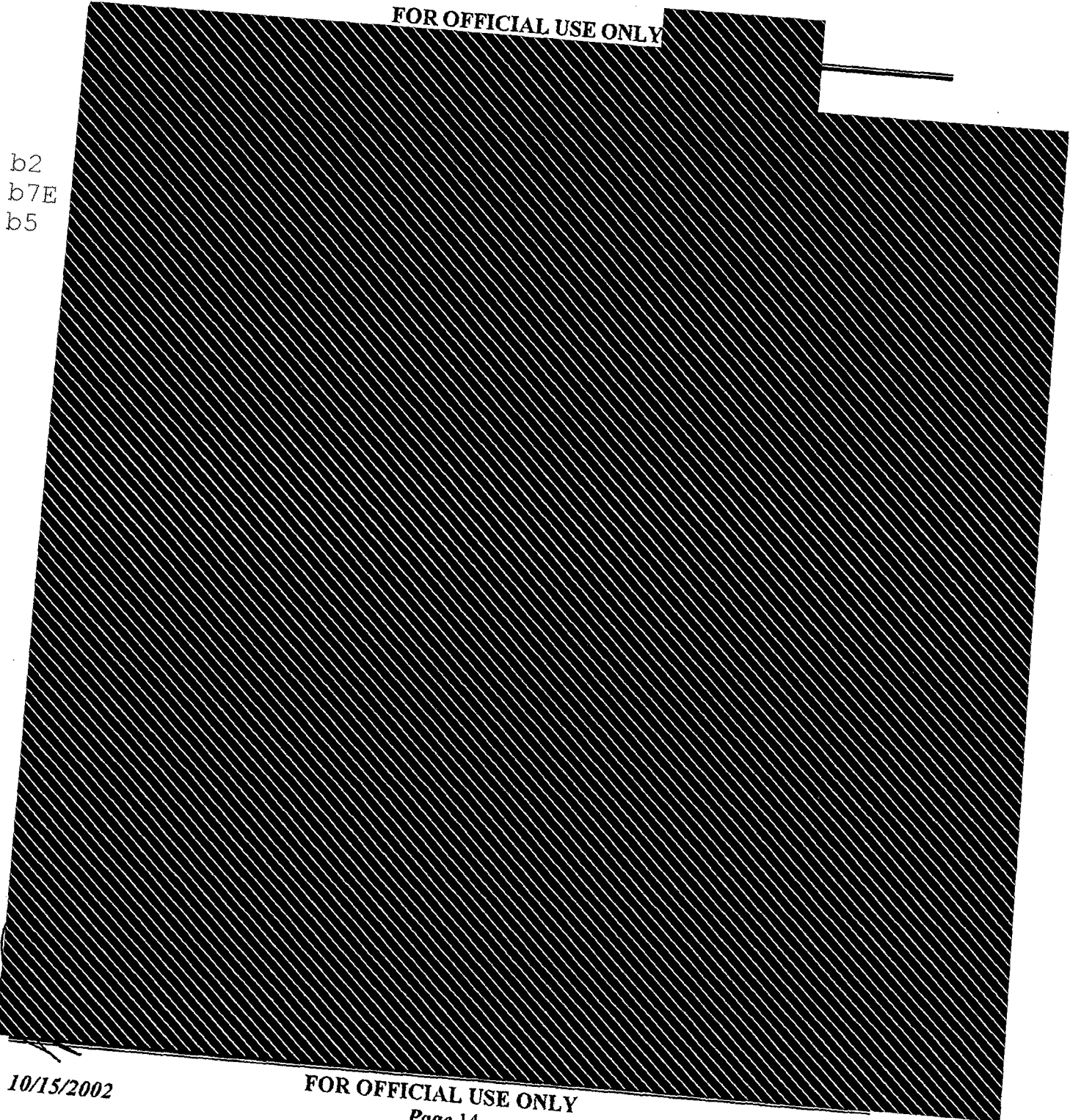
**FOR OFFICIAL USE ONLY**  
Page 13

Revision 2

WORKING DRAFT

FOR OFFICIAL USE ONLY

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10/15/2002

FOR OFFICIAL USE ONLY  
Page 14

Revision 2

**WORKING DRAFT**

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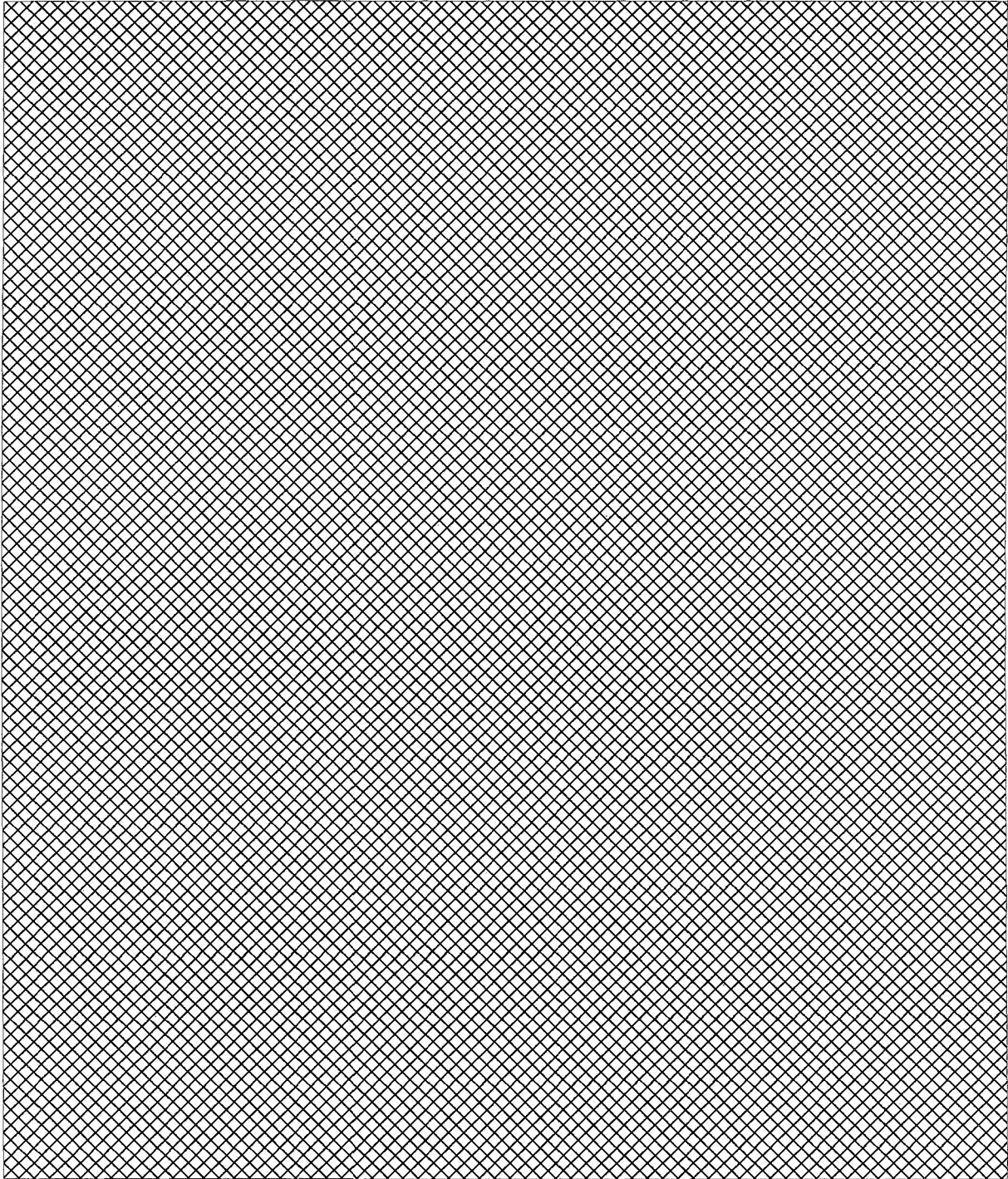
10/15/2002

**FOR OFFICIAL USE ONLY**  
Page 15

Revision 2

**WORKING DRAFT**

**FOR OFFICIAL USE ONLY**



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**FOR OFFICIAL USE ONLY**

*10/15/2002*

*Page 16*

Revision 2

**WORKING DRAFT  
FOR OFFICIAL USE ONLY**

b2  
b7E  
b5

10/15/2002

**FOR OFFICIAL USE ONLY**  
Page 17

Revision 2

**WORKING DRAFT**

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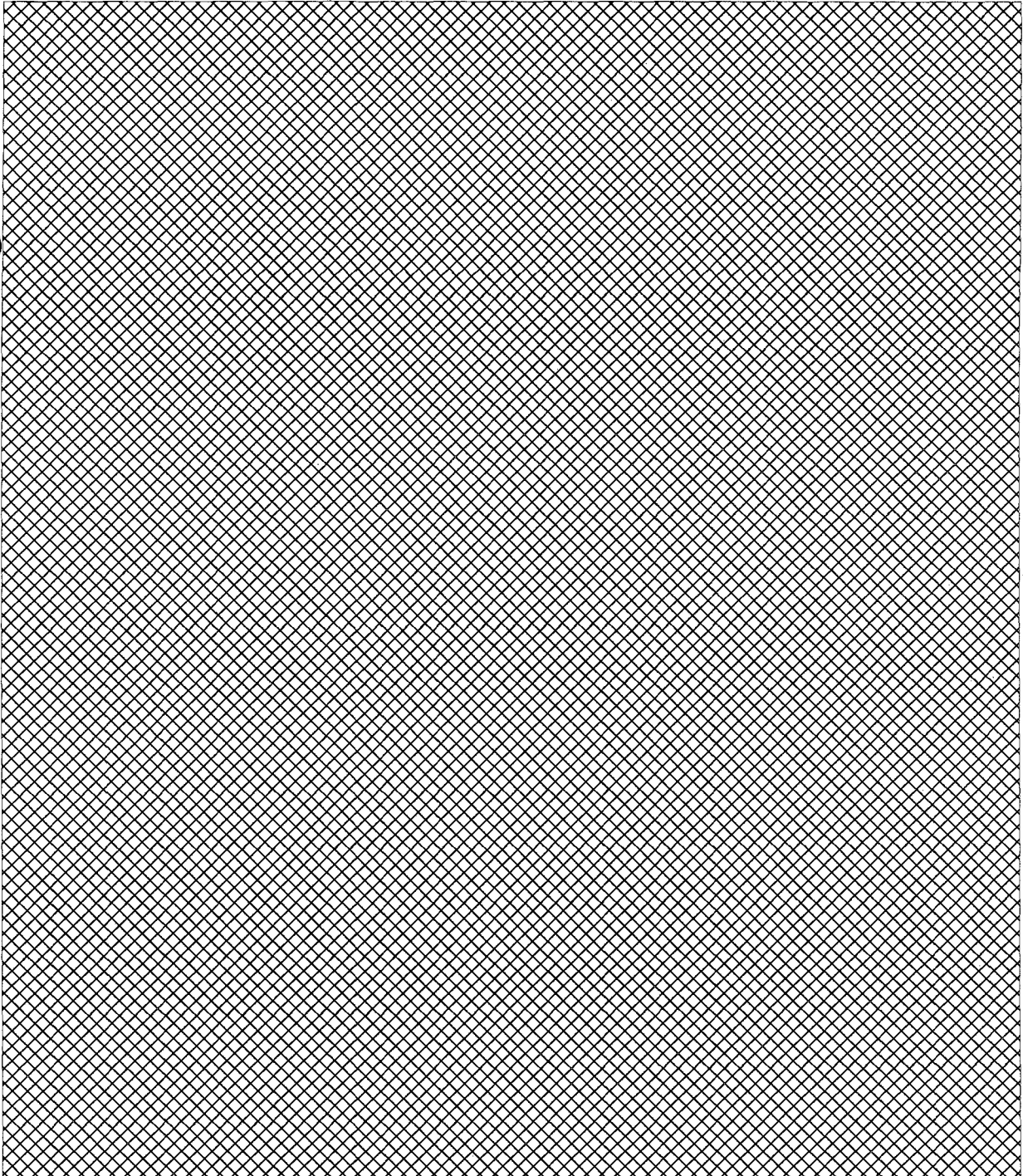
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*Page 18*

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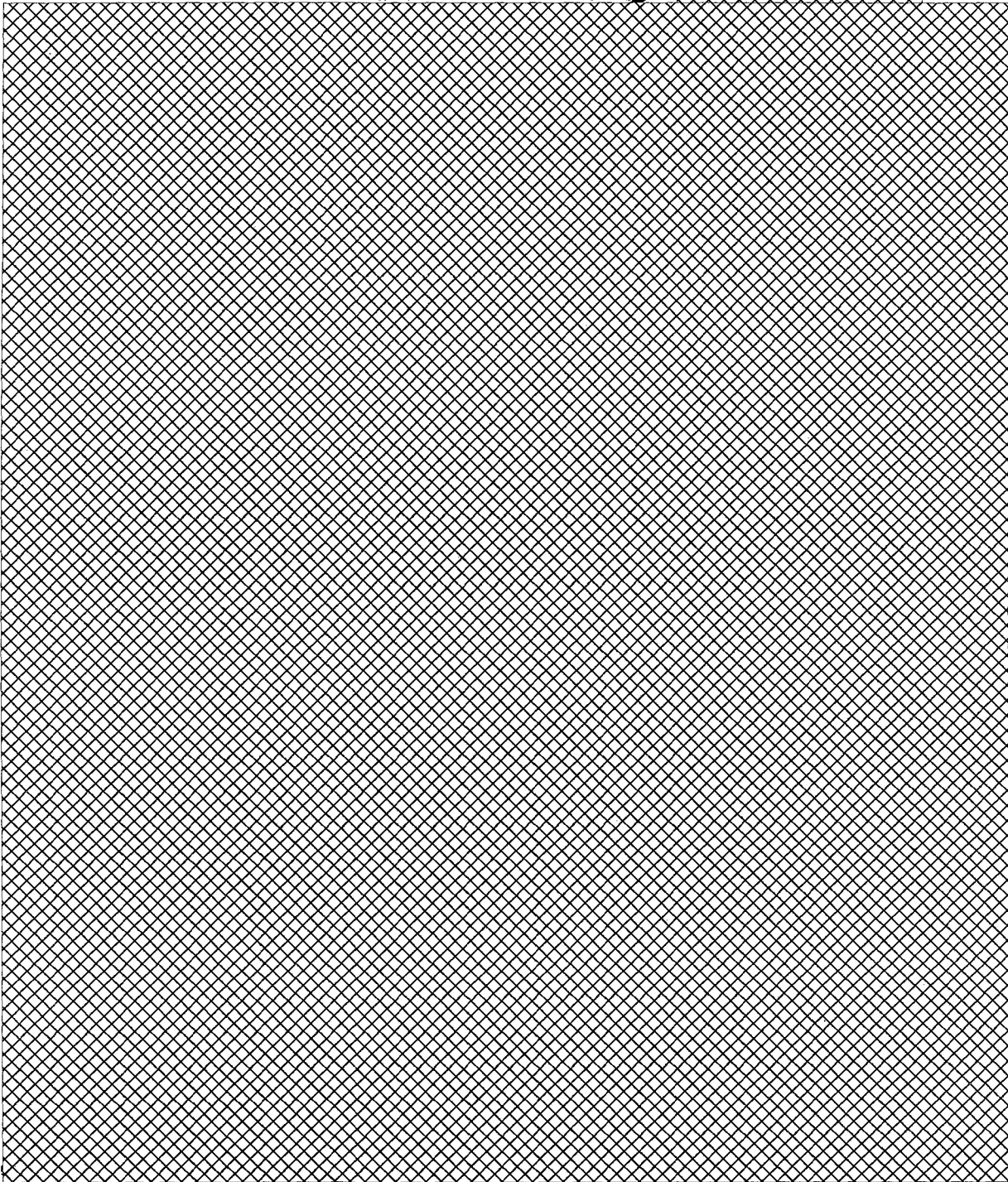


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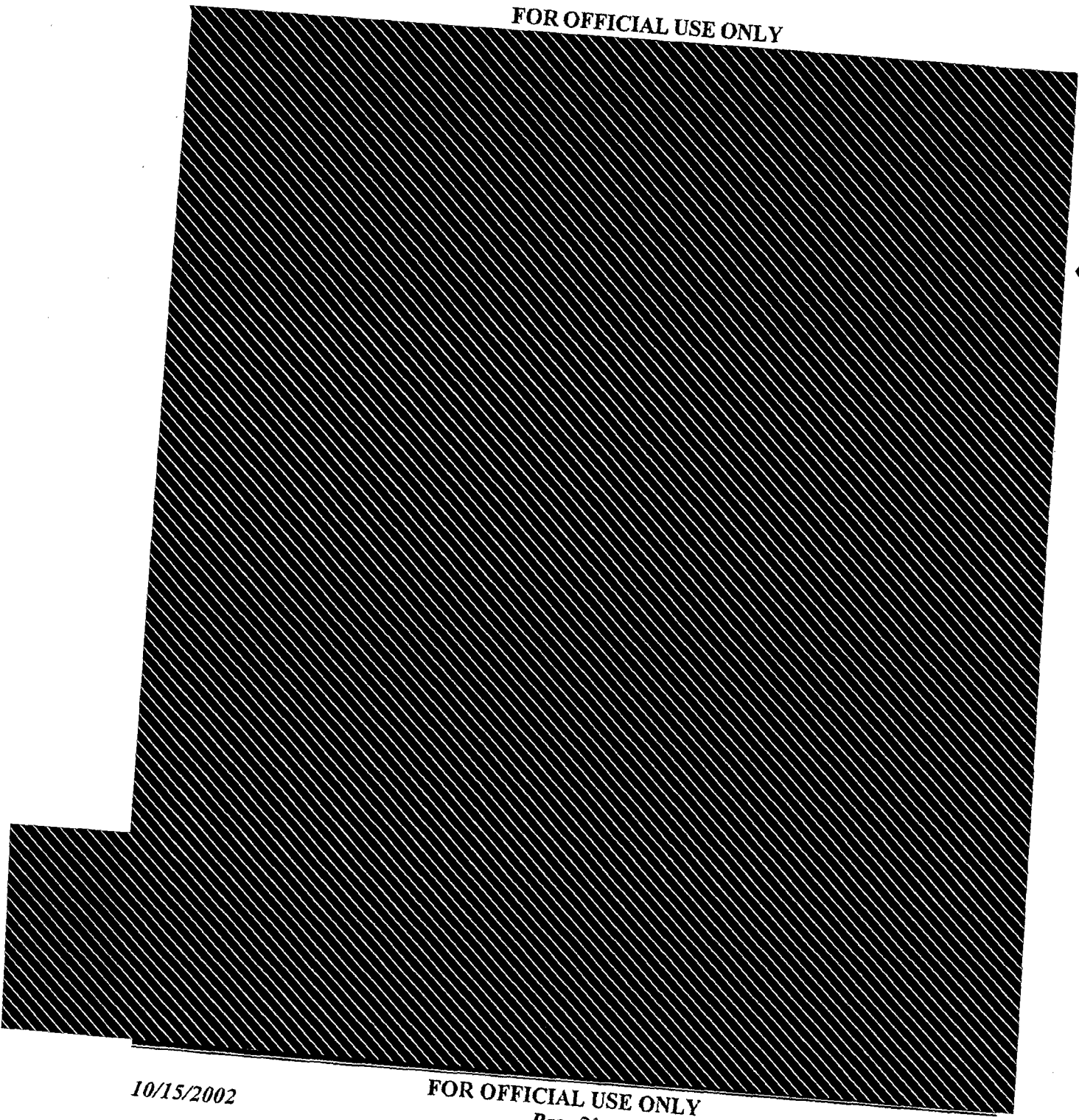
*10/15/2002*

*Page 20*

Revision 2

WORKING DRAFT

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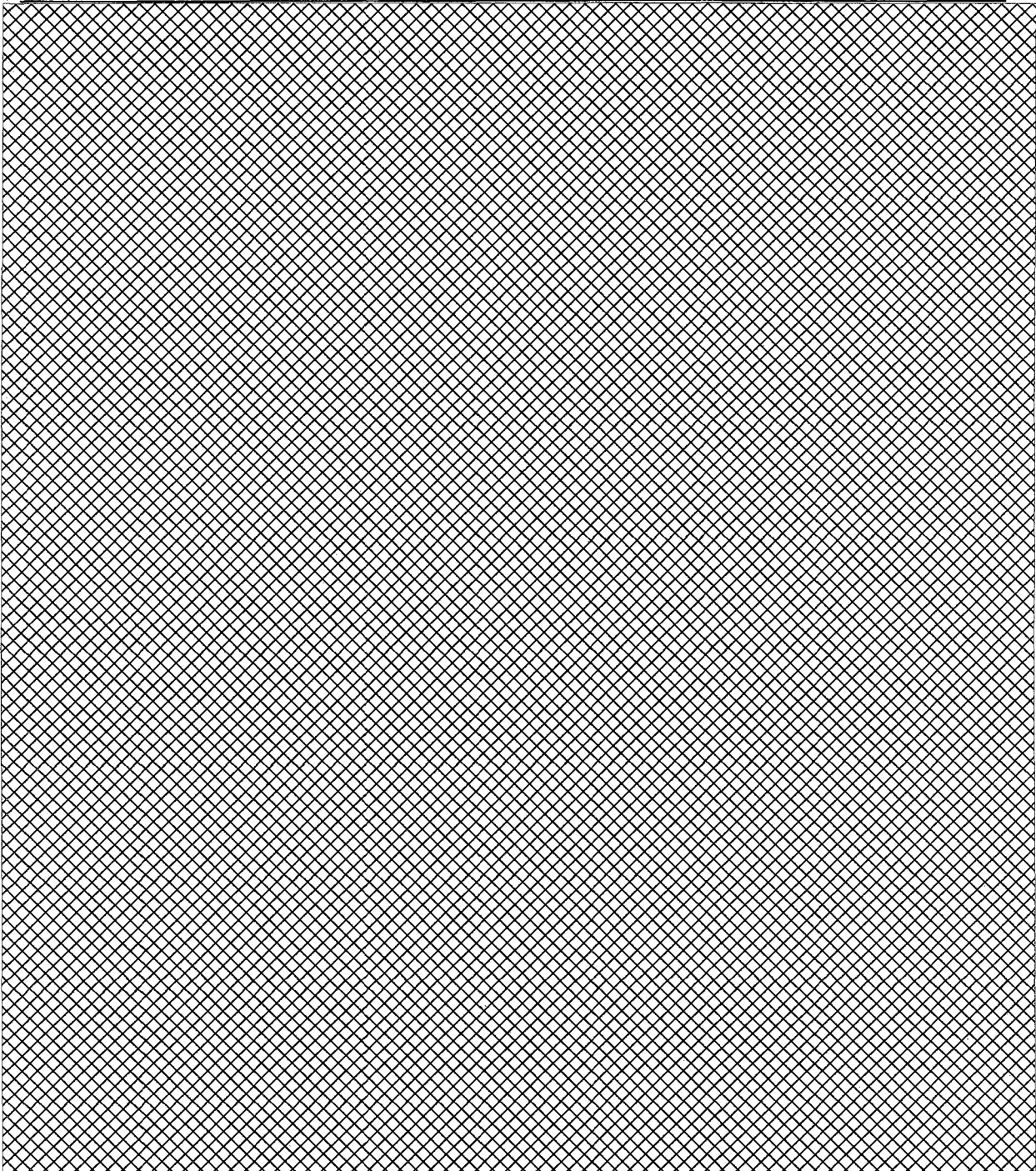
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10/15/2002

FOR OFFICIAL USE ONLY  
Page 21

Revision 2

**WORKING DRAFT**  
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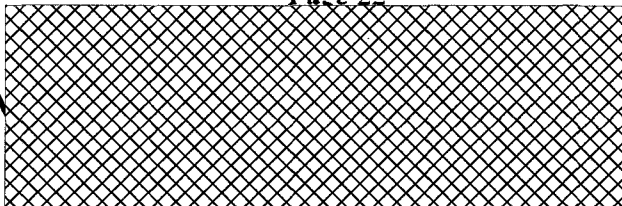
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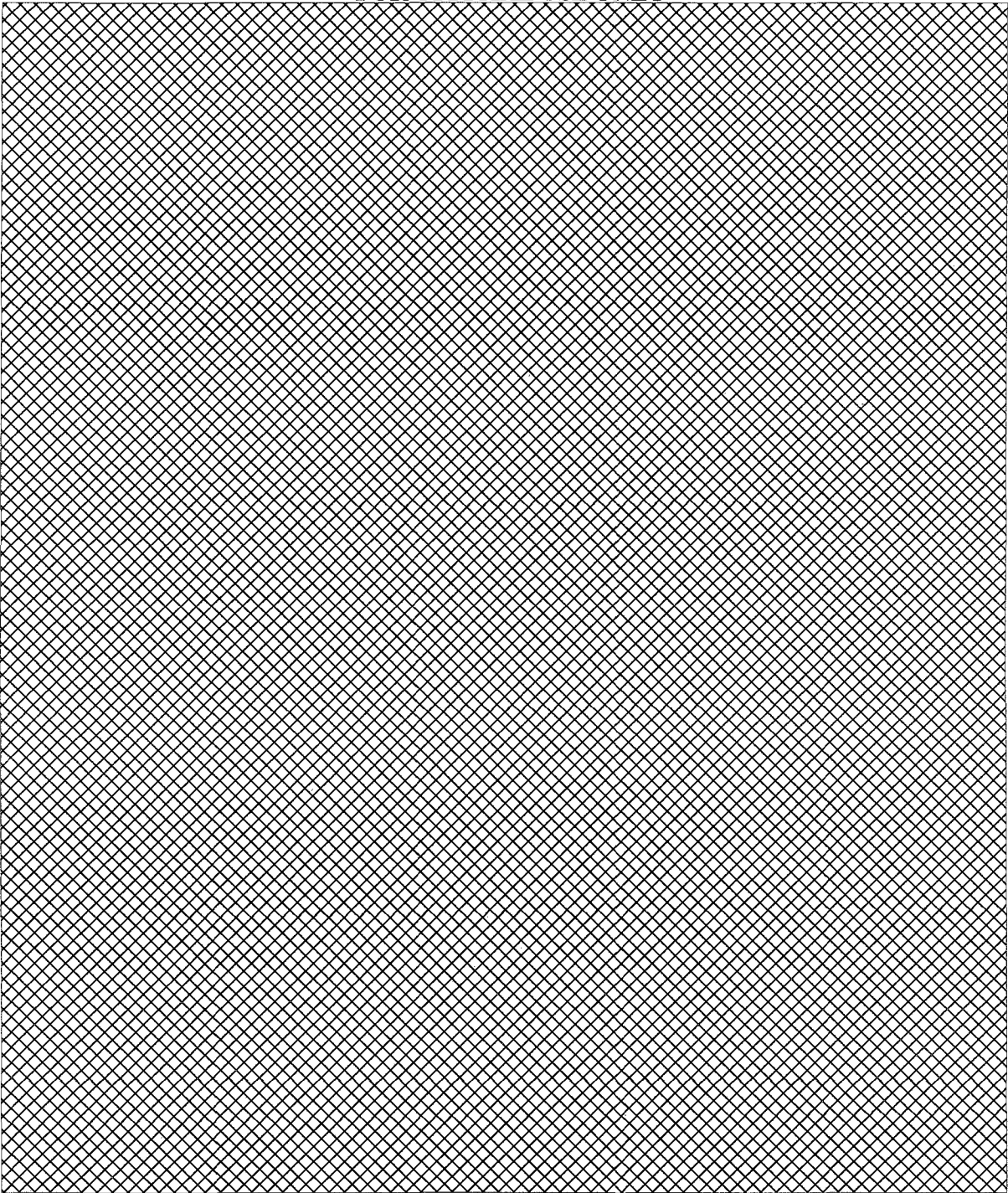
*Page 22*

Revision 2



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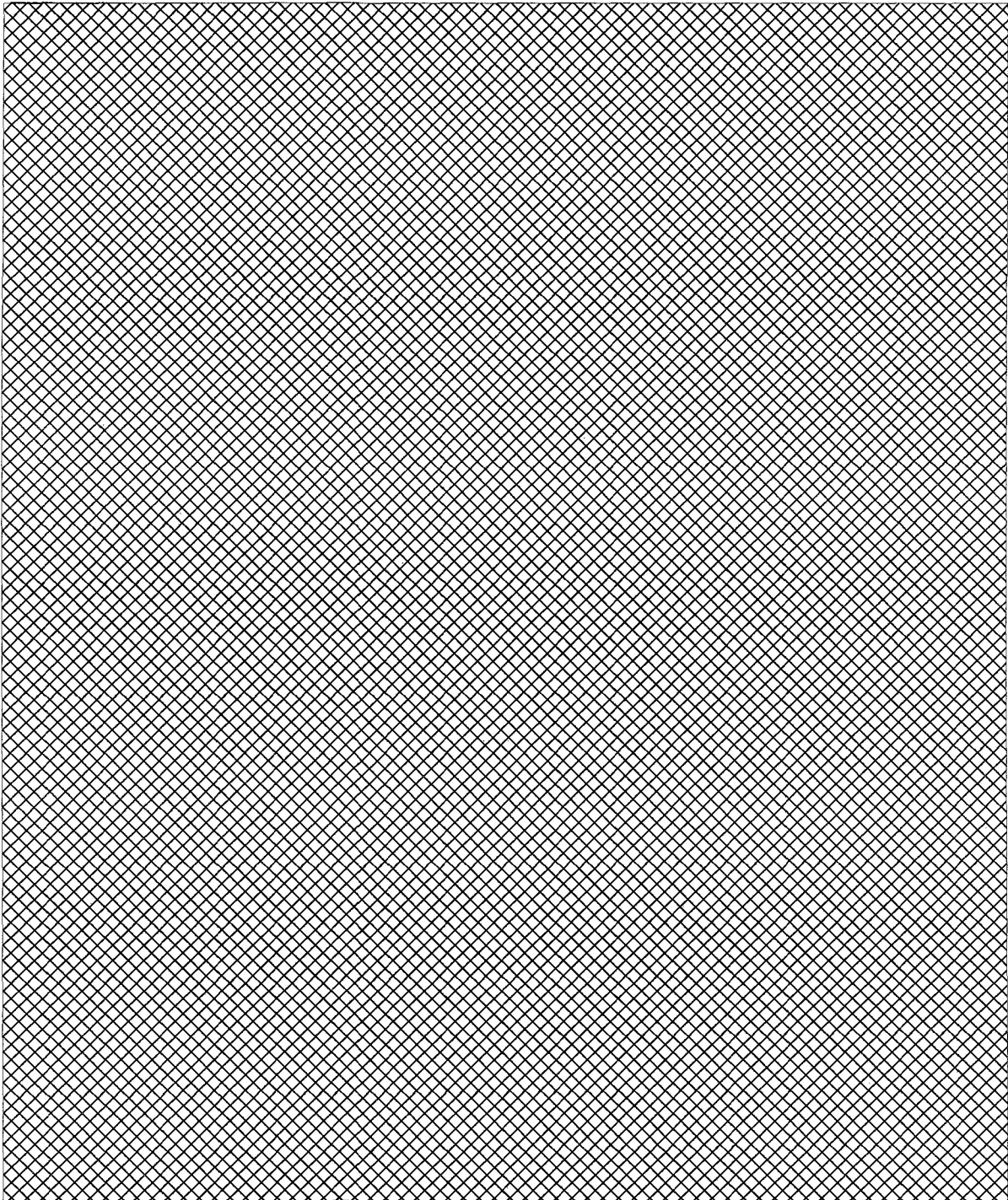
**10/15/2002**

**Page 23**

**Revision 2**

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**FOR OFFICIAL USE ONLY**



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**FOR OFFICIAL USE ONLY**

*10/15/2002*

*Page 24*

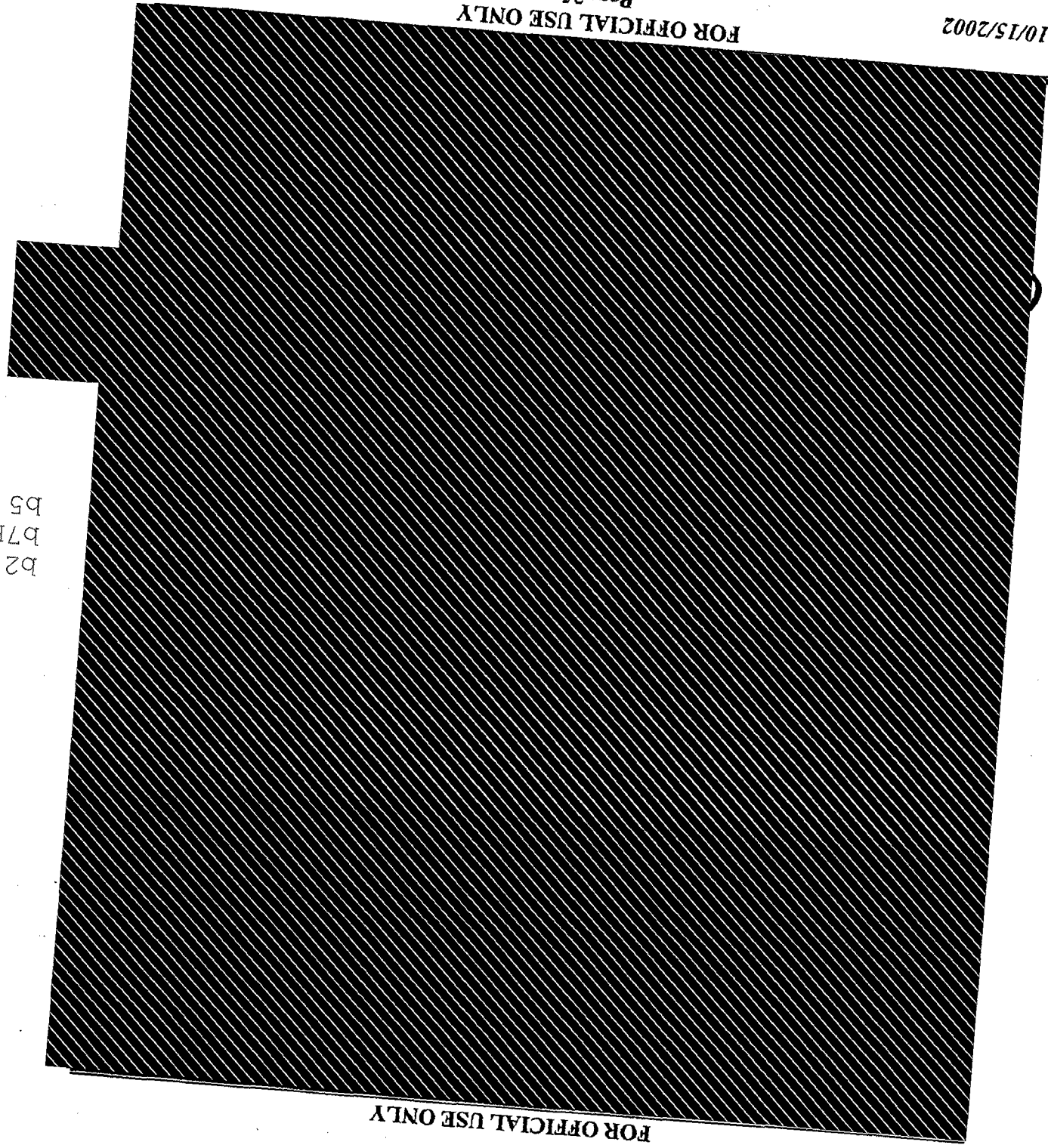
Revision 2

10/15/2002

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Page 25

Revision 2



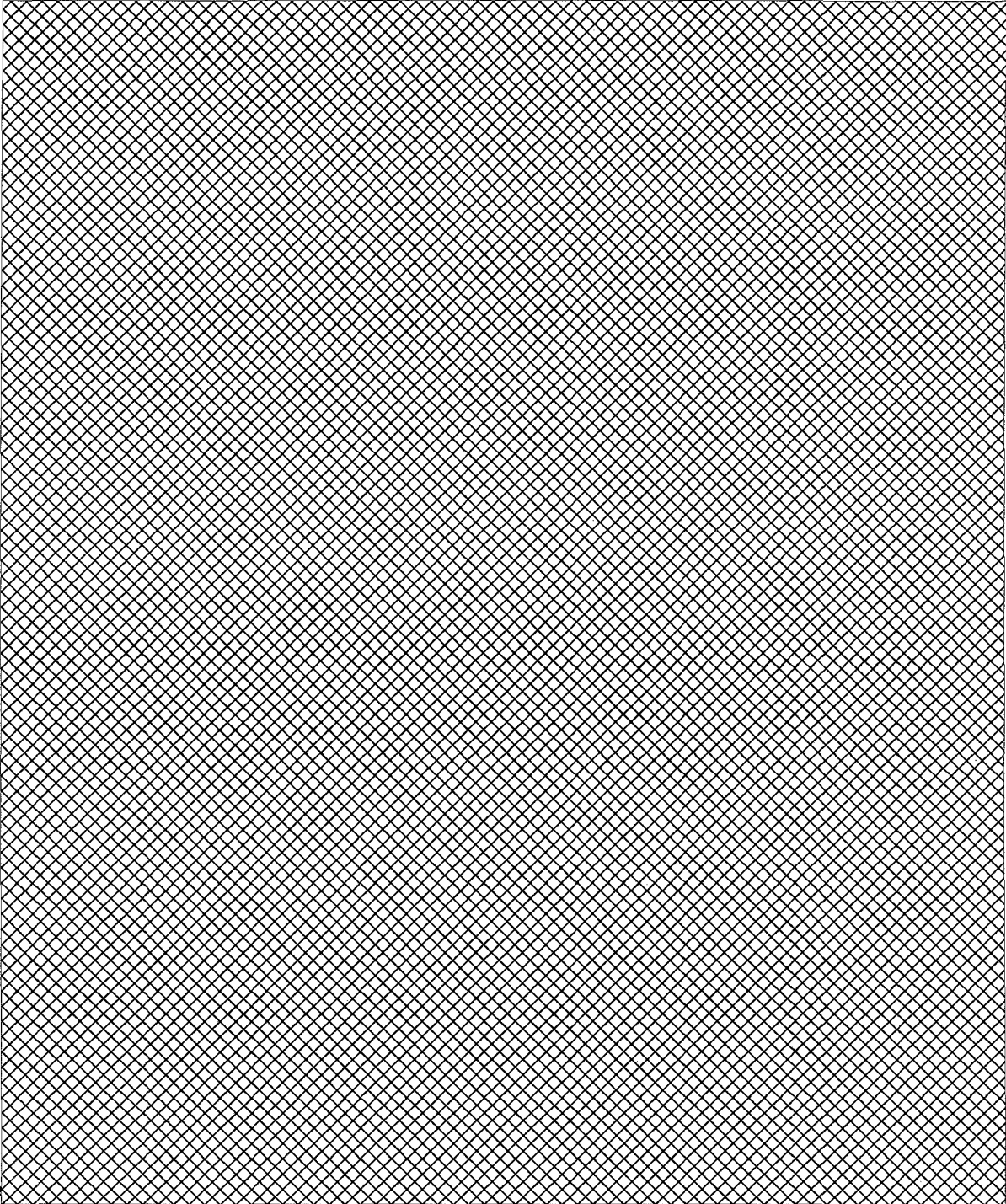
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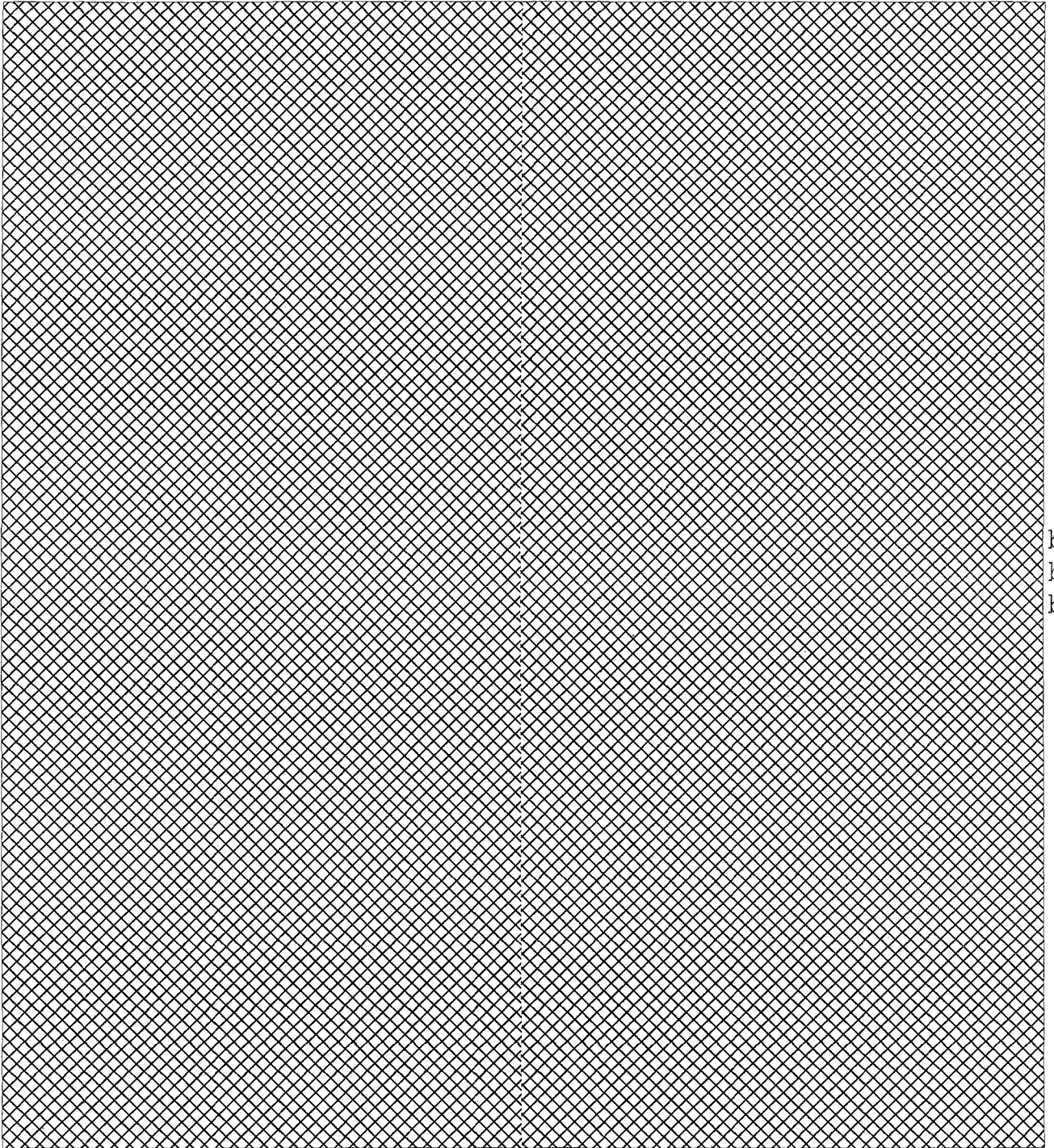
*10/15/2002*

*Page 26*

Revision 2

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**10/15/2002**

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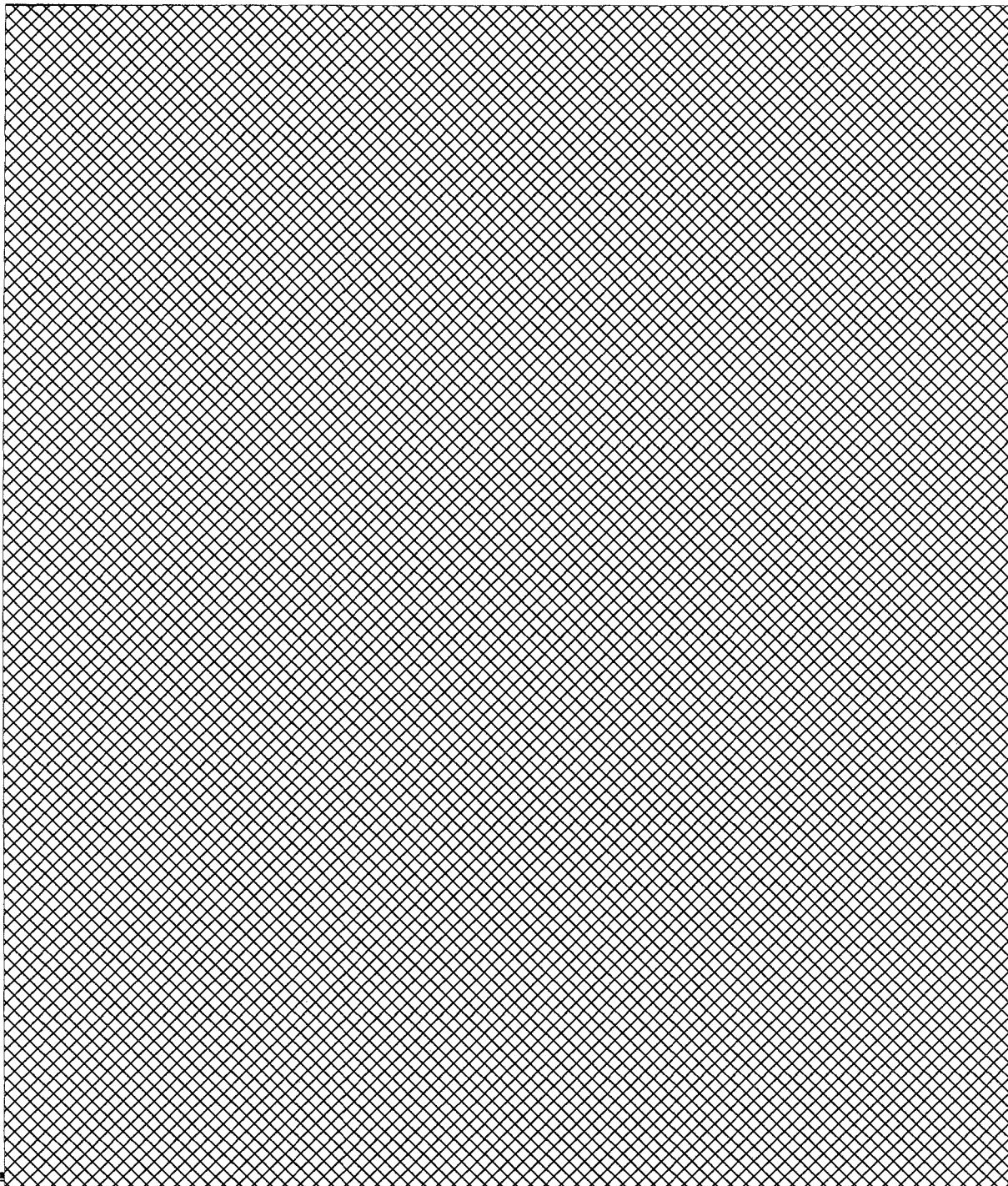
**Page 27**

**Revision 2**



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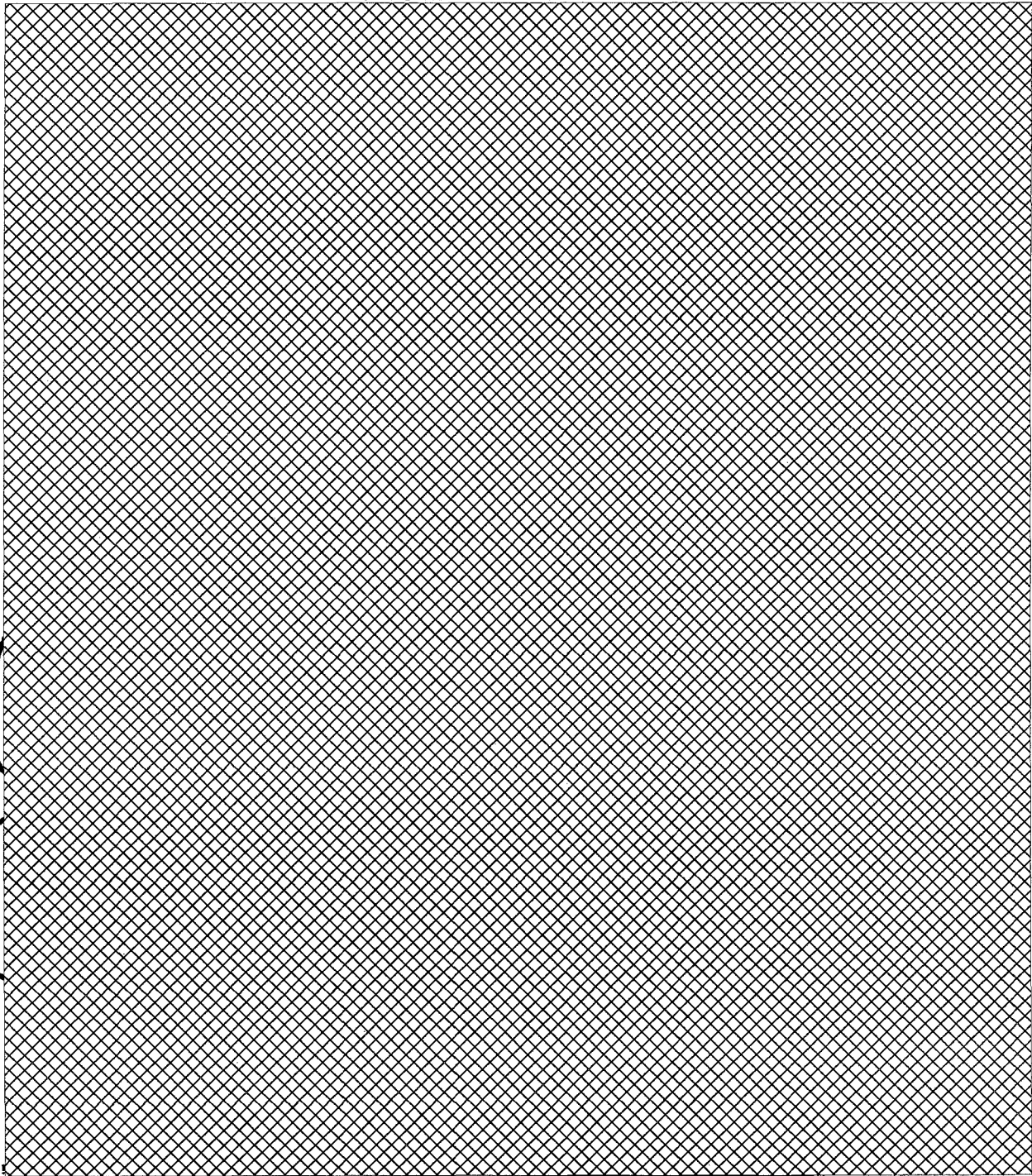
*10/15/2002*

*Page 28*

**Revision 2**

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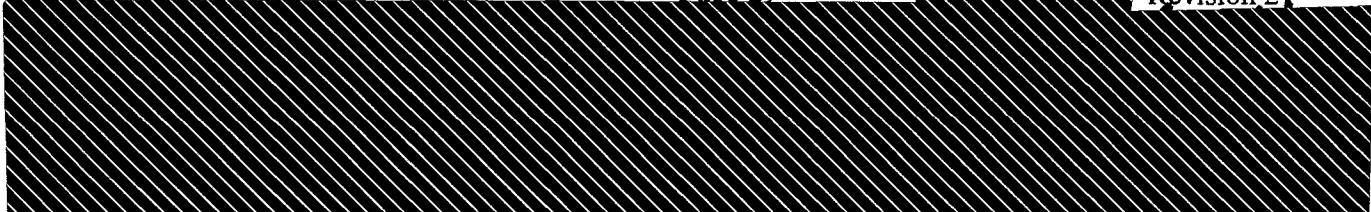
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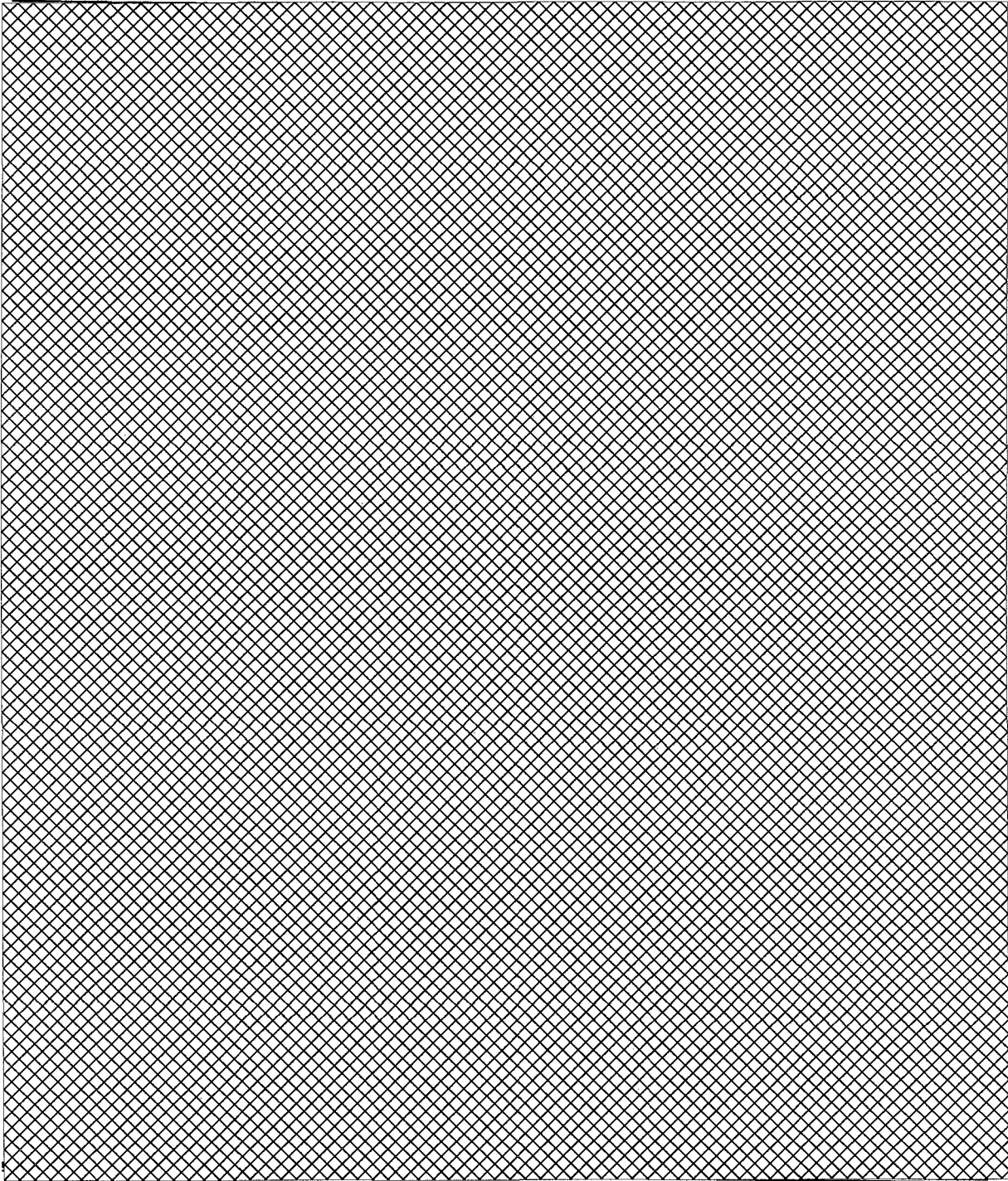
Page 29

Revision 2



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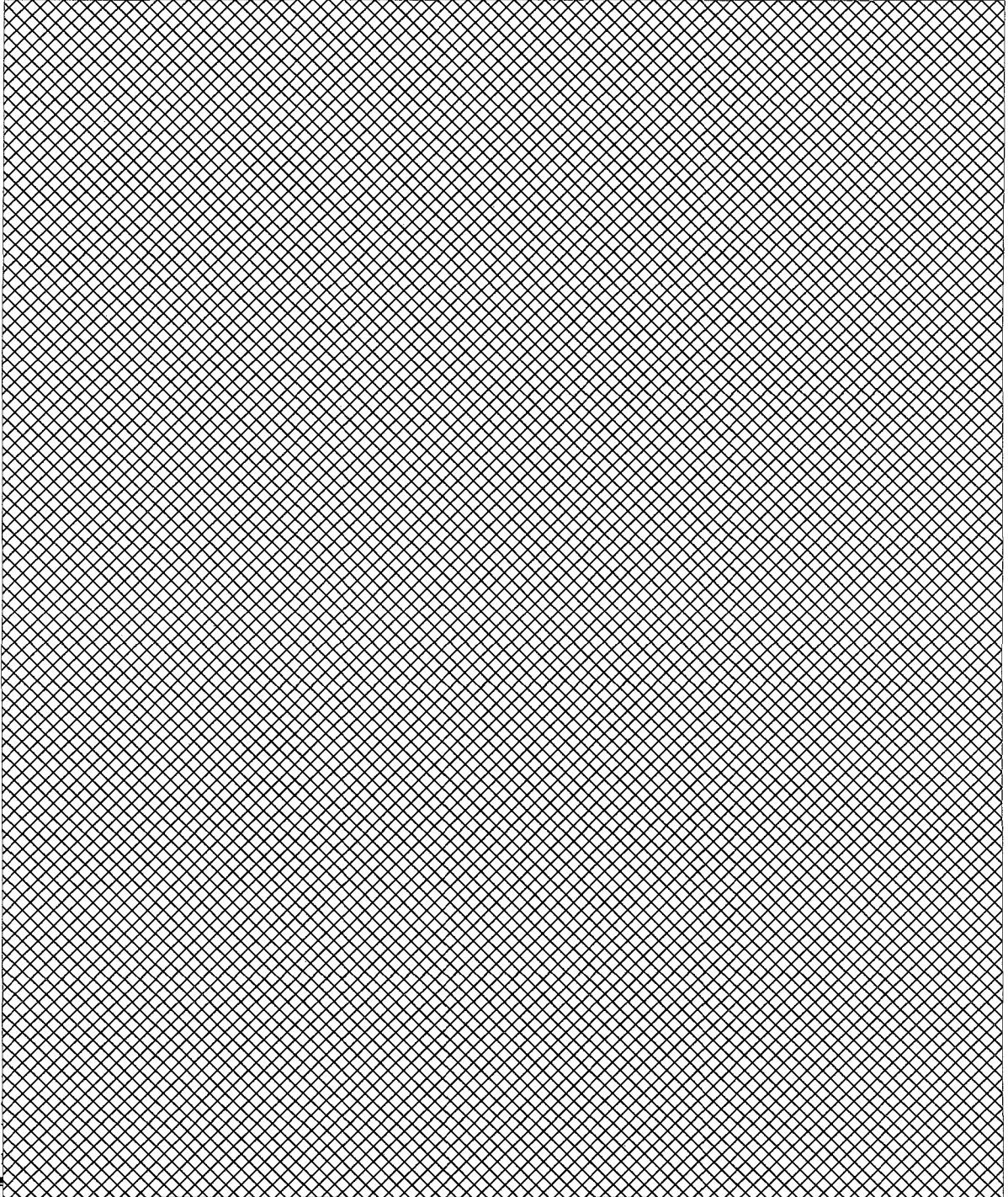
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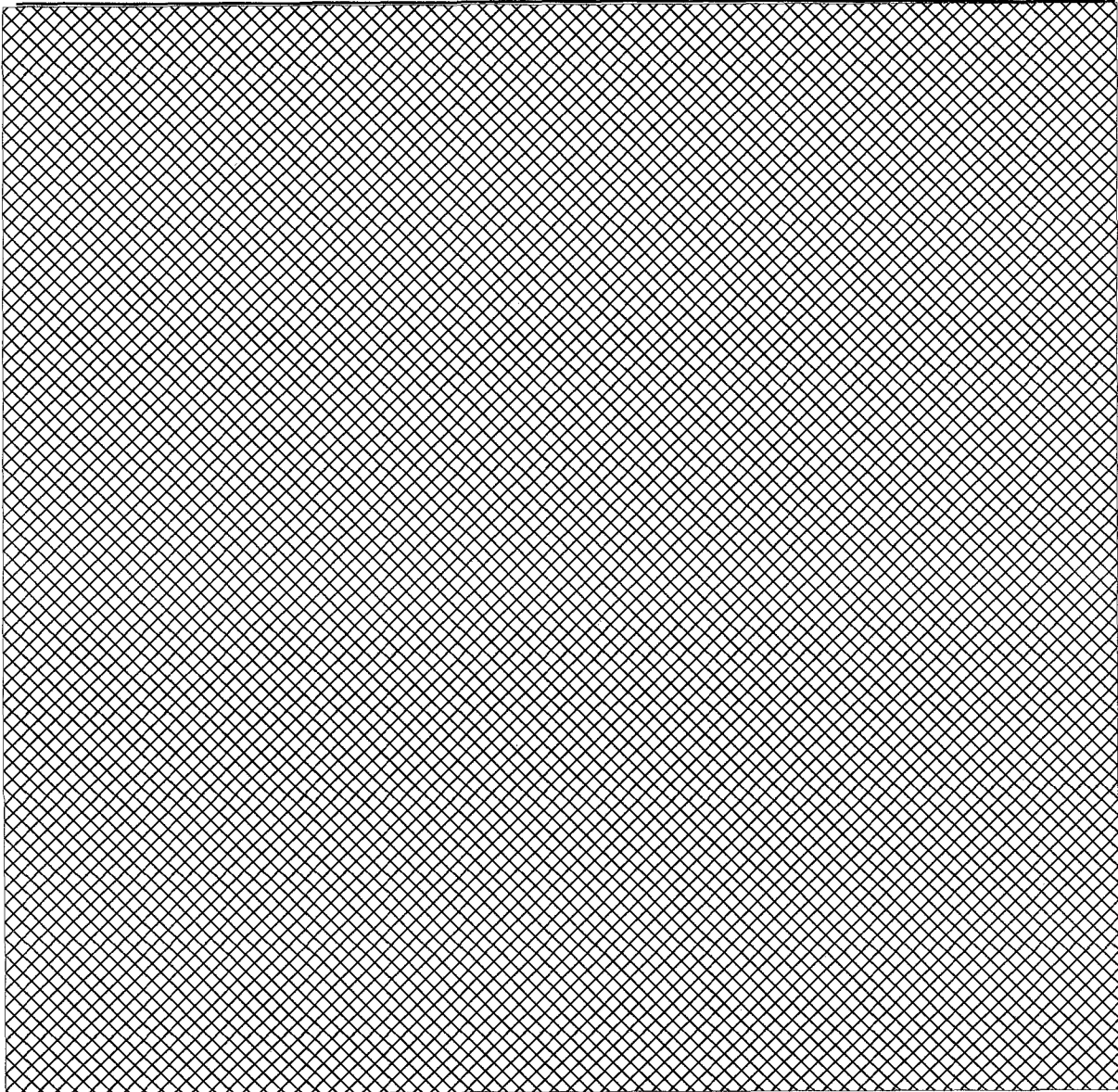
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*Page 31*

Revision 2

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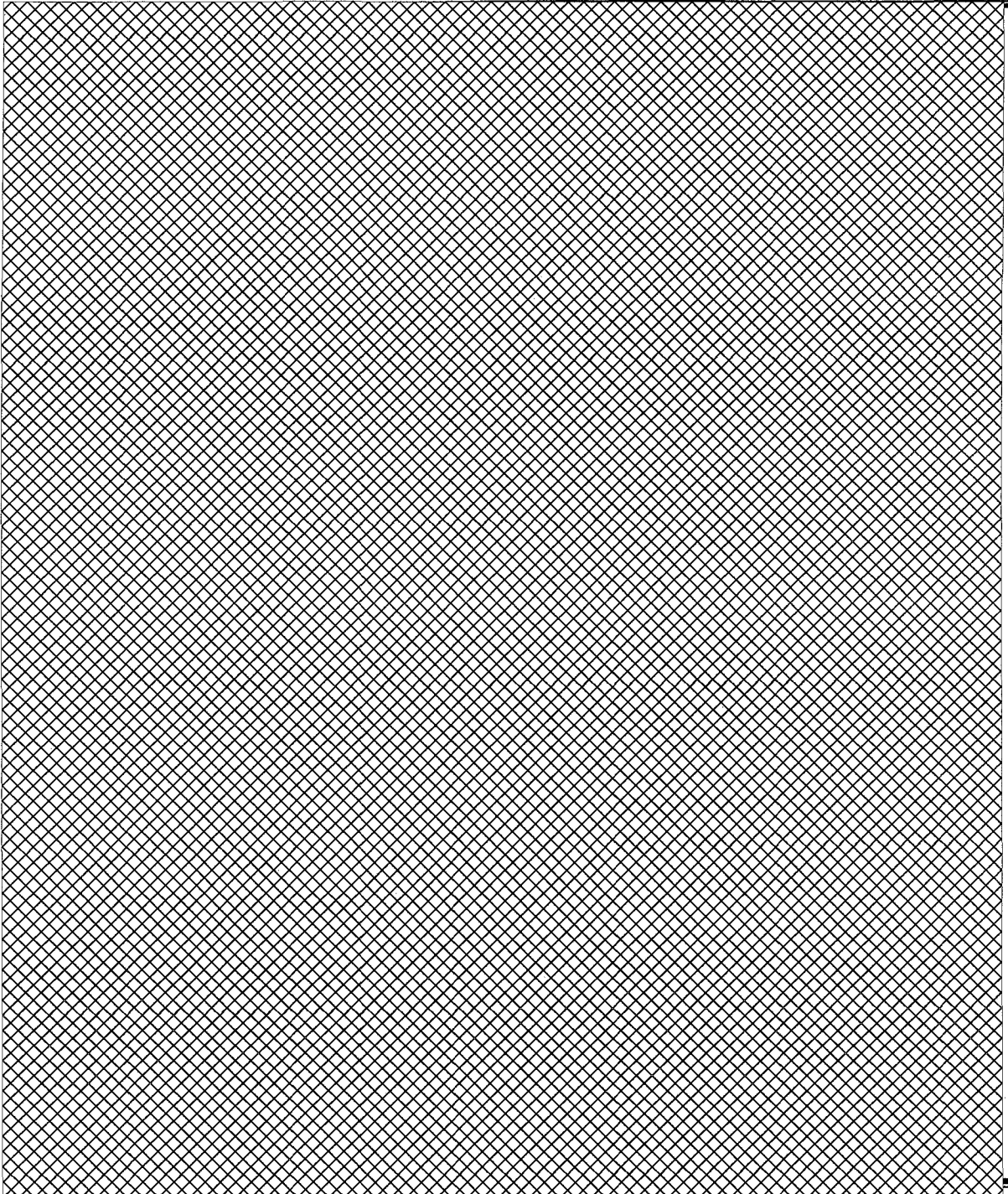
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*10/15/2002*

*Page 33*

Revision 2