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14 **UNITED STATES DISTRICT COURT**  
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16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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18 THE MARY FERRELL FOUNDATION,  
19 INC.; JOSIAH THOMPSON; and GARY  
20 AGUILAR,

21 Plaintiffs,

22 v.

23 JOSEPH R. BIDEN, in his official capacity as  
24 President of the United States; and  
25 NATIONAL ARCHIVES AND RECORDS  
26 ADMINISTRATION,

27 Defendants.  
28

No. 3:22-cv-06176-RS

DECLARATION OF REX BRADFORD

Date: April 30, 2023

Time: 1:30 pm

Dept: Hon. Richard Seeborg

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I, Rex Bradford, declare:

1. I am the president of The Mary Ferrell Foundation, Inc. I have studied the JFK assassination records for many years.
2. The JFK Records Collection Act of 1992, section 4(2)(B) calls for the National Archives and Records Administration (NARA) to create a "central directory of identification aids created for each record transmitted to the Archivist under section 5. Section 5(d) describes these identification aids. Records declassified under the Act indeed feature these attached identification aids, typically labeled Record Identification Forms (commonly, "RIFs").
3. For more than 15 years, NARA has maintained a web page at <https://www.archives.gov/research/jfk/search>, where the only publicly accessible Central Directory is located. Until on or about October 2, 2020, this page featured a search interface. It has since been replaced by a downloadable Excel spreadsheet. The first version of this spreadsheet contained about half of the 319,106 records available through the original search system; after I called this deficiency to the attention of NARA, the spreadsheet was replaced by a new 6-part spreadsheet which featured 319,106 records.

4. This Central Directory, whether in search or spreadsheet form, is a critical “finding aid” to records in the JFK Collection for researchers such as myself and members of the Mary Ferrell Foundation. Without visiting the NARA facility where the paper records are housed, it is the primary means for locating records on individuals, organizations, and research topics.
  
5. I programmed and maintain a page on the Mary Ferrell Foundation website, called the JFK Database Explorer, which provides a sophisticated search and filter interface to the information contained in these spreadsheets. Foundation members including myself regularly use this tool, which is based on the identification aids in NARA’s online Central Directory, to locate records when conducting research.
  
6. In 2020 through 2022 I personally conducted several analyses of the identification aids present in NARA’s Central Directory, and discovered several serious deficiencies which hinder the ability to fully located records using this tool, as discussed in declarations below.
  
7. The Central Directory contains no identification aids for some agencies. It contains no records for the Secret Service or the National Security Agency, as well as at least two other agencies, all of which released JFK records. For more information, see Amended Complaint, section 57a.

8. The Central Directory is missing other identification aids. In the 2017 through 2021 releases, more than 500 of the records posted online by NARA do not have corresponding entries in the Central Directory (beyond the agencies which are entirely absent noted in 5.a. above). For more information, see the Amended Complaint, section 57b.

9. I have posted a spreadsheet of record numbers and associated information for documents referenced in 7 and 8 above, here:

[https://www.maryferrell.org/wiki/files/jfkreleases/MFF\\_JfkRecordsReleasedOnlineButNotInCentralDirectory.csv](https://www.maryferrell.org/wiki/files/jfkreleases/MFF_JfkRecordsReleasedOnlineButNotInCentralDirectory.csv). Note that these particular “missing identification aids” are only known to exist by virtue of NARA putting these documents online. The public has no way of determining how many additional records do not have entries in the Central Directory.

10. Redactions in the Central Directory. More than 5,000 identification aids in the Central Directory feature one or more redactions. This is more than the number of documents NARA claims currently feature redactions. I compiled a list of these here:

[https://www.maryferrell.org/wiki/files/jfkreleases/MFF\\_JfkRedactedEntriesInCentralDirectory.csv](https://www.maryferrell.org/wiki/files/jfkreleases/MFF_JfkRedactedEntriesInCentralDirectory.csv).

11. Reclassifications in the Central Directory and in Records Themselves. In examining an updated version of the 6-part spreadsheet which occurred on or about June 28, 2021, I

noticed that several identification aids in the new spreadsheet had redactions where the previous version did not. I also discovered several instances where records released in 2018 contained redactions not present in the identical document when released earlier in 2017. My understanding is that the JFK Records Act prohibits reclassification of Assassination Records, and that this would by implication include identification aids too.

12. In response to a FOIA request by governmentattic.org in 2016 (see [https://www.maryferrell.org/wiki/files/jfkreleases/foiaNGC16-095\\_2016\\_3603.pdf](https://www.maryferrell.org/wiki/files/jfkreleases/foiaNGC16-095_2016_3603.pdf)), NARA produced a list of 3,603 records then said to be “withheld in full,” amended later to 3,598 records, and then again to 3,571.
  
13. In response to an inquiry I made regarding the above-referenced amendment from 3,598 to 3,571 records, NARA staffer James Mathis in an email of August 30, 2016 explained that after an investigation “We believe a page was missed in the scanning of the original document that was posted on NARA's website” and attached a list of them. These 27 “withheld in full” documents, however, were never subsequently placed online by NARA. I have made a list of these records available here:  
  
[https://www.maryferrell.org/wiki/files/jfkreleases/MFF\\_JfkRecordsMissing27Doj.csv](https://www.maryferrell.org/wiki/files/jfkreleases/MFF_JfkRecordsMissing27Doj.csv).
  
14. Some records said to be “open in full” are not publicly available. The declassification status of many entries in the Central Directory appears to be inaccurate. I conducted an analysis of the records released by NARA in 2017 and 2018, as compared to the

“withheld in full” list of records produced by NARA in 2016 in response to the governmentattic.org FOIA request. After inquiring of NARA as to why hundreds of the FOIA-referenced documents were not then subsequently released, NARA staffer Martha Murphy replied in an April 6, 2018 email. She provided a list of 337 records which in the lead-up to the 2017 releases “were determined to be open in full in the open Collection.” I provided a list of a subset of 27 of these records to Jefferson Morley, who subsequently visited the NARA facility in College Park, MD and searched for these records, with staff assistance. The majority of the 27 records could not be located or their folders contained withholding notices.

I declare under penalty of perjury that the foregoing is true and correct and of my own personal knowledge. Executed on March 7, 2023, in Ipswich, Massachusetts.

A handwritten signature in cursive script, appearing to read "Rex Bradford", written over a horizontal line.

Rex Bradford