

Exhibit 3

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN OVERSIGHT,

Plaintiff,

v.

No. 25-cv-883

PETE HEGSETH, in his official
capacity as Secretary of
Defense, et al.,

Defendants.

DECLARATION OF HURLEY V. BLANKENSHIP

I, Hurley V. Blankenship, hereby declare as follows:

1. I currently serve as the Chief Data Officer (CDO) and the Director of the Agency Data Office (ADO) at the Central Intelligence Agency ("CIA" or "Agency"). I have held this position since November 21, 2019, and I have served as a CIA officer for over 13 years. In my capacity as CDO, and pursuant to the OPEN Government Data Act of 2019, I am responsible for lifecycle data management of the CIA and carry out various statutory responsibilities pertaining to the maintenance and preservation of CIA data. As CDO, I have been designated by the Director of the Central Intelligence Agency as the Senior Agency Official for Records Management and the CIA Archivist, who is responsible for implementing the Agency's records maintenance and preservation obligations under the Federal Records Act. As

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CDO and Director of the ADO, I oversee information management on behalf of the CIA and work to develop unified strategies, policies, standards, and practices to govern the acquisition, use, management, and protection of CIA data.

2. Through the exercise of my official duties, I have become familiar with the claims asserted against the defendants in this matter, including those against CIA Director John L. Ratcliffe in his official capacity. I make the following statements based upon my personal knowledge and information made available to me in my official capacity.

3. I understand that Director Ratcliffe maintains a personal account on the commercial messaging application known as Signal, through which he was invited to participate in "the Signal chat" referenced in the plaintiff's complaint. See Compl. ¶ 28. I further understand that residual administrative content from "the Signal chat" was retrievable from that account, and that that content has since been transferred to Agency systems.

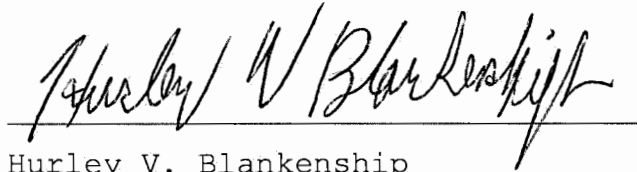
4. I understand that on 27 March 2025, CIA's Office of General Counsel issued a litigation hold notice, which directed relevant offices and officers to preserve documents and information pertaining to this matter.

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* * *

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

Executed this 31st day of March 2025

A handwritten signature in black ink, reading "Hurley V. Blankenship", is written over a horizontal line.

Hurley V. Blankenship
Chief Data Officer
Central Intelligence Agency