

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
TRUE THE VOTE, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:13-cv-00734-RBW
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
Defendants.)	
)	

DECLARATION OF TIMOTHY P. CAMUS

I, Timothy P. Camus, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Deputy Inspector General for Investigations (DIGI) for the Treasury Inspector General for Tax Administration (TIGTA). In my capacity as the DIGI, I am primarily responsible for all investigative activities conducted by TIGTA’s Office of Investigations. The Office of Investigations performs as its principal function investigative activity pertaining to the enforcement of criminal laws. I have held this position since January 2011 and have been employed by TIGTA since it was created in 1999.

2. TIGTA was created as an agency within the Department of the Treasury by the enactment of the Internal Revenue Service Restructuring and Reform Act of 1998 (RRA 98), which amended the Inspector General Act of 1978, 5 U.S.C. app 3.

3. In accordance with § 3(a) of the Inspector General Act, TIGTA reports to and is under the general supervision of the Secretary of the Treasury.



4. TIGTA is an agency, within the Department of the Treasury, separate and apart from the Internal Revenue Service (IRS) and operates wholly independent of the IRS.

5. Pursuant to the Inspector General Act, TIGTA is responsible for conducting criminal and administrative investigations into alleged misconduct and criminal violations by IRS employees, as well as protecting against threats to tax administration from external parties. While the Commissioner of Internal Revenue has authority under the Inspector General Act to ask TIGTA to perform an audit or investigation, the Commissioner has no authority or control over TIGTA, the nature or scope of TIGTA investigations, and/or the investigative records and evidence maintained by TIGTA.

6. The Office of Investigations is responsible for investigating threats arising from lapses in IRS employee integrity, violence directed against the IRS, and external attempts to corruptly interfere with Federal tax administration. TIGTA's Office of Investigations employs GS-1811, Criminal Investigators (special agents), who are responsible for conducting investigations that protect tax administration from internal and external threats and corruption, protect the integrity of IRS programs, operations and critical infrastructure, detect and prevent fraud and abuse, and investigate IRS employees for alleged criminal violations and administrative misconduct.

All TIGTA personnel assigned to its ongoing investigation into Lois Lerner's missing emails and computer hard drive crash are trained law enforcement personnel (i.e., GS- or ES-1811s, criminal investigator (special agents)), have in-depth knowledge of investigative principles, techniques, methods, and procedures, have received professional investigative training, and have experience in a primary rigorous law enforcement position. TIGTA currently has 11 special agents and four management officials assigned to this investigation. Two of the management officials are members of the Senior Executive Service. Eight of the individuals assigned to the investigation are technical investigative professionals (technical special agents) specifically trained and qualified to conduct digital forensics and computer and electronic media

related examinations in support of investigations involving computers, e-mails, the internet and other electronic storage media.

7. The technical special agents assigned to the investigation have received extensive training in computer and electronic investigations to include training at the Federal Law Enforcement Training Center, the Department of Defense's Defense Cyber Investigations Training Academy, the National White Collar Crime Center, courses at the Federal Bureau of Investigation as well as other training courses and seminars hosted by government agencies, universities and private industry. The technical special agents assigned to this investigation have a combined 93 years of experience in the computer and electronic investigation field.

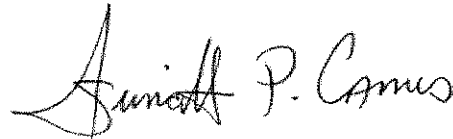
The two supervisory technical special agents assigned to this investigation have been supervising technical investigative units since 2008. Both have been trained at the Federal Law Enforcement Training Center as Seized Computer Evidence Recovery Specialists and on Encase Analytics, forensic recovery software. One of the supervisors has been an instructor at various Federal, state and local law enforcement training events on topics involving computer forensics, evidence recovery, and general computer-related crimes, including one course taught internationally. He also wrote a technical instructional guide that is being used by law enforcement digital forensic examiners both domestically and internationally.

8. TIGTA has identified this investigation as a top priority and is dedicating significant resources to it, including 11 special agents, in order to complete it as expeditiously as possible. However, at this stage of the investigation it is not possible to give an estimated date of completion.

9. Any forensic examinations that were “previously conducted” would have been performed by the IRS. In addition, the remaining items contained in the Order in the above-captioned case are matters within the control of the IRS.

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

Executed this 17 day of July, 2014.

Handwritten signature of Timothy P. Camus in black ink.

TIMOTHY P. CAMUS