| Availability: | □ Low □ Moderate □ High □ Undefined |

**PRIVACY THRESHOLD REVIEW**

*(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)*

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

**Component Privacy Office Recommendation:**

*Please include recommendation below, including what new privacy compliance documentation is needed.*

Click here to enter text.

*(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)*

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

**DESIGNATION**

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Choose an item. If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>Choose an item.</td>
</tr>
<tr>
<td></td>
<td>If “other” is selected, please describe: Click here to enter text.</td>
</tr>
<tr>
<td>Determination:</td>
<td>□ PTA sufficient at this time.</td>
</tr>
<tr>
<td></td>
<td>□ Privacy compliance documentation determination in progress.</td>
</tr>
<tr>
<td></td>
<td>□ New information sharing arrangement is required.</td>
</tr>
<tr>
<td>DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
<td></td>
</tr>
<tr>
<td>Privacy Act Statement required.</td>
<td></td>
</tr>
<tr>
<td>Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td>System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
<td></td>
</tr>
<tr>
<td>A Records Schedule may be required. Contact your component Records Officer.</td>
<td></td>
</tr>
</tbody>
</table>

**PIA:**
Choose an item.
If covered by existing PIA, please list: Click here to enter text.

**SORN:**
Choose an item.
If covered by existing SORN, please list: Click here to enter text.

**DHS Privacy Office Comments:**
Please describe rationale for privacy compliance determination above.
Click here to enter text.
FYI. Are you in the know about this from an allocation standpoint? I can generate the EPCTW once I get the particulars from [redacted] if you don’t foresee any obstacles.

Thanks,

[redacted]

---

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.

---

Can we move forward in this contract for the facial recognition software? I’ll have [redacted] work with [redacted] do a pctw if we are good to go.
June 14, 2019

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations

Dear Section Chief,

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

• Service & Quantity: 3 User-Accounts
• Service Duration: 12 Months

Each Account Includes:

• Unlimited Use of Clearview’s Proprietary Search System
• Unlimited Access to Clearview’s Proprietary Image Database
• iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive: 3 User-Accounts for 12 Months):

Best regards,

[Signature]
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

Clearview AI
917-73...
From: Clearview AI

Sent: Friday, June 14, 2019 3:22 PM

To: ropose ontract for Clearview AI - Thx

Subject: Proposed Contract for Clearview AI - Thx

Hi,

It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

Clearview AI
917-734

June 14, 2019

Dear Section Chief

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

- Service & Quantity: 3 User-Accounts
- Service Duration: 12 Months

Each Account Includes:

- Unlimited Use of Clearview’s Proprietary Search System
- Unlimited Access to Clearview’s Proprietary Image Database
- iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive: 3 User-Accounts for 12 Months):

Best regards,
From: (b)(6); (b)(7)(C)
To: 
Cc: 
Subject: FW: Requesting Access - Urgent Case (sexual abuse of a child)
Date: Wednesday, February 26, 2020 11:11:36 AM

(b)(6); (b)(7)(C) we are not in Germany. Do you think HSI can help this person?

205.568. (b)(6)
(b)(6); clearview.ai

From: (b)(7)(E) clearview.ai> on behalf of (b)(6); (b)(7)(C)
Date: Wednesday, February 26, 2020 at 4:49 AM
To: (b)(7)(E) s@clearview.ai" (b)(7)(E)@clearview.ai>
Subject: Requesting Access - Urgent Case (sexual abuse of a child)

Dear Sir or Madam,

(b)(7)(E)

With kind regards

(b)(6); (b)(7)(C)

Detective

State-Criminal-Office Northrhine Westphalia, Germany
Cyber-Investigation- and Tracingcenter (b)(6); 

Völklinger Str. 49, 40221 Düsseldorf, Germany
Phone +49 211 939 (b)(6)
Telefax +49 211 939-194213
(b)(6); (b)(7)(C) polizei.nrw.de
https://bsa.polizei.nrw

Cyber-Investigation- and Tracingcenter (b)(6); 
Phone +49 211 939 (b)(6)
Fax +49 211 939-4238
cruzf.ka@polizei.nrw.de

HINWEIS: Diese E-Mail incl. aller Anlagen ist vertraulich und ist ausschließlich zum Gebrauch für den Adressaten bestimmt. Falls Sie nicht
CONFIDENTIALITY NOTICE: This e-mail (and any attachments transmitted with it) may be confidential and/or privileged material and is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, any use, dissemination, forwarding, printing or copying of this mail is strictly prohibited. If you received this in error, please contact the sender and delete all copies on your system.
Hi [b](6); (b)(7)(C) 

You should have a setup email in your inbox shortly. It only takes one minute to install and start searching.

Here are three important tips for using Clearview:

1. **Search a lot.** Your Clearview account has **unlimited** searches. Don’t stop at one search. See if you can reach 100 searches. It’s a numbers game. Our database is always expanding and you never know when a photo will turn up a lead. Take a selfie with Clearview or search a celebrity to see how powerful the technology can be.

2. **Refer your colleagues.** The more people that search, the more successes. We want to make this advanced technology available to as many investigators as possible. If you think your colleagues might want to try Clearview out for themselves, just send their names and e-mail addresses to help@clearview.ai and we’ll sign them all up too.

3. **Get Clearview for the long haul.** If you like Clearview at the end of your trial period and it’s helping you solve cases, put us in touch with the appropriate person at your organization who can proceed with procurement.

Feel free to reach out to if you have any questions, comments, or feedback. Just reply to this e-mail or contact help@clearview.ai

Finally, please note the disclaimer at the bottom.

Best regards,

— Team Clearview

**OFFICIAL DISCLAIMER**

Search results established through Clearview AI and its related systems and technologies are indicative and not definitive. Clearview AI, Inc. makes no guarantees as to the accuracy of its search-identification software. Law enforcement professionals MUST conduct further research in order to verify identities or other data generated by the Clearview AI system. Clearview AI is neither designed nor intended to be used as a single-source system for establishing the identity of an individual. Furthermore, Clearview AI is neither designed nor intended to be used as evidence in a court of law.
# Clearview AI, Inc

+1 866-637-0257

---

**Invoice**

**Invoice number:** 1AEFB13F-0001  
**Date of issue:** Jun 20, 2019  
**Date due:** Jun 25, 2019

---

**Bill to:**

- (b)(6); (b)(7)(C)

ice.dhs.gov

---

[b](4) **due June 25, 2019**

---

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td>(b)(4)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**Amount due:**

(b)(4)

---

**Pay with ACH or wire transfer**

- **Bank:** WELLS FARGO BANK N A  
- **Routing:** (b)(6); (b)(7)(C)  
- **Account:** ~-------~  
- **SWIFT:** WFBIUS6S

**Pay with card**

- **Visit:** pay.stripe.com/invoice/invst_xoUWDxKxDoFKgEmj8rYTWkS6zi

---

**Questions?** Call Clearview AI, Inc at +18666370257.
Clearview AI, Inc

Invoice

Invoice number 1AEFB13F-0001
Date of issue Jun 20, 2019
Date due Jun 25, 2019

Bill to
(b)(6); (b)(7)(C)
@ice.dhs.gov

due June 25, 2019

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Amount due [b](4)

Pay with ACH or wire transfer
Bank WELLS FARGO BANK, N.A.
Routing [b](6); [b](7)(C)
Account
SWIFT WFBJUS6S

Pay with card
Visit pay.stripe.com/invoice/invst_xoUWDxKxDoFKgEmj8rYTWkS6zi

Questions? Call Clearview AI, Inc at +18666370257.
### Invoice

**Invoice number**: 1AEFB13F-0003  
**Date of issue**: Sep 5, 2019  
**Date due**: Oct 5, 2019

---

**Clearview AI, Inc**

+1 866-637-0257  
help@clearview.ai

---

**Description** | **Qty** | **Unit price** | **Amount**
--- | --- | --- | ---
Yearly subscription to 3 seats | (b)(4) |  | (b)(6); (b)(7)(C)

---

**Amount due**: (b)(6); (b)(7)(C)

---

**Pay with card**  
Visit pay.stripe.com/invoice/invst_XIIzykRx07LVmIBC6uGq7es1NT

---

**Questions**? Contact Clearview AI, Inc at help@clearview.ai or call at +1 866-637-0257.
# Invoice

**Clearview AI, Inc**

+1 866-637-0257  
help@clearview.ai

<table>
<thead>
<tr>
<th>Invoice number</th>
<th>1AEFB13F-0003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of issue</td>
<td>Sep 5, 2019</td>
</tr>
<tr>
<td>Date due</td>
<td>Oct 5, 2019</td>
</tr>
</tbody>
</table>

**Bill to**  
(b)(6); (b)(7)(C)

due October 5, 2019

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly subscription to 3 seats</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Amount due**

(b)(4)

**Pay with card**

Visit pay.stripe.com/invoice/invst_XIizykRx07LVmIIBC6uGq7es1NT

**Questions?** Contact Clearview AI, Inc at help@clearview.ai or call +1 866-637-0257.
DEPARTMENT OF HOMELAND SECURITY

Stage: Card Holder Review

PURCHASE CARD TRANSACTION WORKSHEET

<table>
<thead>
<tr>
<th>1. Name of Cardholder</th>
<th>2. Cardholder Email Address</th>
<th>3. Cardholder Phone Number</th>
<th>4. Program/office:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6), (b)(7)(C)</td>
<td>ice.dhs.gov</td>
<td>(703) 599-2097</td>
<td>Homeland Security</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Program/office:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component: ICE</td>
</tr>
<tr>
<td>Investigations/</td>
</tr>
<tr>
<td>Investigative Programs</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Requestor Name</th>
<th>7. Requestor Phone Number</th>
<th>8. Date of Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6), (b)(7)(C)</td>
<td>(503) 209-2099</td>
<td>09/03/2019</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9. Document ID Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clearview AI SEP19</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10. Ship To Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>11320 Random Hills Rd, Ste 10</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11. City:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fairfax</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>12. State:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virginia</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>13. Zip Code:</th>
</tr>
</thead>
<tbody>
<tr>
<td>22030</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>14. Vendor Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clearview AI</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>15. Vendor POC:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(917) 732-3505</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>16. Vendor Phone Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6), (b)(7)(C)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>17. Vendor Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>15 West 72nd St. - Suite</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>18. City:</th>
</tr>
</thead>
<tbody>
<tr>
<td>New York</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>19. State:</th>
</tr>
</thead>
<tbody>
<tr>
<td>New York</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>20. Zip Code:</th>
</tr>
</thead>
<tbody>
<tr>
<td>10023</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>21. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Clearview AI licenses</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>22. Item #</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>23. Item Stock Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(4)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>24. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACM 30</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>25. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>31/ MDL 18</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>26. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase Log ID:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>27. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>40168</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>28. Item Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>#18 PAPER</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>29. Date Received</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/3/2019</td>
</tr>
</tbody>
</table>

33. TO REQUIRED SOURCES for SUPPLIES

<table>
<thead>
<tr>
<th>1. Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Inventories</td>
</tr>
<tr>
<td>2. Excess from other agencies</td>
</tr>
<tr>
<td>3. Federal Prison Industries</td>
</tr>
<tr>
<td>4. Commercial</td>
</tr>
<tr>
<td>5. Wholesale</td>
</tr>
<tr>
<td>6. Commercial</td>
</tr>
<tr>
<td>7. Other</td>
</tr>
<tr>
<td>8. Accountable</td>
</tr>
<tr>
<td>9. Printing</td>
</tr>
<tr>
<td>10. Branding</td>
</tr>
<tr>
<td>11. Legal</td>
</tr>
</tbody>
</table>

34. FUNDS VERIFICATION OFFICIAL INFORMATION

<table>
<thead>
<tr>
<th>Printed Funding Official Name and Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6), (b)(7)(C) / Program Analyst</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phone Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(703) 293-2000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/03/2019</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SIGNATURE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved and digitally signed by:</td>
</tr>
<tr>
<td>(b)(6), (b)(7)(C)</td>
</tr>
</tbody>
</table>

35. APPROVING OFFICIAL/ALTERNATE APPROVING OFFICIAL INFORMATION

<table>
<thead>
<tr>
<th>Printed Approving Official Name and Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6), (b)(7)(C) / Unit Chief</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phone Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(703) 293-2000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/03/2019</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SIGNATURE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved and digitally signed by:</td>
</tr>
<tr>
<td>(b)(6), (b)(7)(C)</td>
</tr>
</tbody>
</table>

36. PURCHASE CARD HOLDER INFORMATION

Card Holder Signature: |

Date of Purchase: |

AMOUNT PAID: |

37. ALL THE ABOVE ITEMS HAVE BEEN RECEIVED AND ACCEPTED (Third Party- Cannot be the cardholder or the approving official)
<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Item #</th>
<th>Item Number</th>
<th>24. Stock Number</th>
<th>25. Quantity</th>
<th>26. Unit of Issue</th>
<th>27. Unit Price</th>
<th>28. Subtotals Received for Use On</th>
<th>29. Date Received</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>3 Clearview AI licenses</td>
<td>1</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

30. Accounting Data: SOR 31/ MDL 18

31. Purchase Log ID: 01/16

33. TO REQUIRED SOURCES for SUPPLIES TO BE PURCHASED: None

34. FUNDS VERIFICATION OFFICIAL INFORMATION

Printed Funding Official Name and Title: Management & Program Analyst

Phone Number: (703) 293-0000

Date: 09/03/2019

SIGNATURE: Approved and digitally signed by:

Printed Approving Official Name and Title: Unit Chief

Phone Number: (703) 293-0000

Date: 09/03/2019

SIGNATURE: Approved and digitally signed by:

36. PURCHASE CARD HOLDER INFORMATION

Card Holder Signature: 

Date of Purchase: 

AMOUNT PAID: 

37. ALL THE ABOVE ITEMS HAVE BEEN RECEIVED AND ACCEPTED (Third Party- Cannot be the cardholder or the approving official)
From: (b)(6); (b)(7)(C)
To: (b)(6); (b)(7)(C)
Subject: ITSR Waiver
Date: Friday, June 21, 2019 9:15:00 AM
Attachments: EPCTW Clearview AI with emailed approvals and ITSR waiver email Matt Wright.pdf

I have attached the EPCTW for Clearview AI, along with the emailed approvals from (b)(6); (b)(7)(C) and the attachment also includes email from (b)(6); (b)(7)(C) about an ITSR waiver for this. Would you be able to stamp this so I can make the purchase today?

Thank you,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-(b)(6).

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid “need-to-know” without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
**DEPARTMENT OF HOMELAND SECURITY**

**Stage:** Funds Verification Official Review

<table>
<thead>
<tr>
<th><strong>PURCHASE CARD TRANSACTION WORKSHEET</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Name of Cardholder:</strong></td>
</tr>
<tr>
<td>(b)(6); (b)(7)(C)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>3. Cardholder Email Address:</strong></th>
<th><strong>4. Component:</strong></th>
<th><strong>5. Program/Office:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6); (b)(7)(C)</td>
<td>ICE</td>
<td>Homeland Security Investigations / Investigative Programs</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>6. Requestor Name:</strong></th>
<th><strong>7. Requestor Phone Number:</strong> 209-</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6); (b)(7)(C)</td>
<td>(b)(6); (b)(7)(C)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>8. Date of Request:</strong></th>
<th><strong>9. Document ID Number:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>06/20/2019</td>
<td>Clearview AI</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>10. Ship To Address:</strong></th>
<th><strong>11. City:</strong></th>
<th><strong>12. State:</strong></th>
<th><strong>13. Zip Code:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>11320 Random Hills Rd, Ste</td>
<td>Fairfax</td>
<td>Virginia</td>
<td>22030</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>14. Vendor Name:</strong></th>
<th><strong>15. Vendor Address:</strong></th>
<th><strong>16. Vendor Phone Number:</strong> 971 734-</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clearview AI</td>
<td>15 West 72nd St., New York</td>
<td>(b)(6); (b)(7)(C)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>17. Vendor City:</strong></th>
<th><strong>18. State:</strong></th>
<th><strong>19. Zip Code:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>New York</td>
<td>10023</td>
</tr>
</tbody>
</table>

**22. Item #** | **23. Item Description** | **24. Stock Number** | **25. Quantity** | **26. Unit of Issue** | **27. Unit Price** | **28. Subtotals** | **29. Date Received** |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>3 User Accounts and 12 months service</td>
<td>N/A</td>
<td>(b)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**30. Accounting Data:**

**31. Purchase Log ID:**

**32. ESTIMATED ORDER TOTAL:** (b)(4)

**33. TO REQUIRED SOURCES for SUPPLIES**

**34. FUNDS VERIFICATION OFFICIAL INFORMATION**

**Printed Funding Official Name and Title:** (b)(6); (b)(7)(C) / Management & Program Analyst

**Phone Number:** (703) 29 

**Date:** SIGNATURE:

**35. APPROVING OFFICIAL/ALTERNATE APPROVING OFFICIAL INFORMATION**

**Printed Approving Official Name and Title:** (b)(6); (b)(7)(C) / Unit Chief

**Phone Number:** (b)(6); (b)(7)(C) 

**Date:** SIGNATURE:

**36. PURCHASE CARD HOLDER INFORMATION**

**Card Holder Signature:**

**Date of Purchase:** AMOUNT PAID:

**37. ALL THE ABOVE ITEMS HAVE BEEN RECEIVED AND ACCEPTED (Third Party- Cannot be the cardholder or the approving official)**

**Printed Name and Title:** (b)(6); (b)(7)(C) / Special Agent

**Phone Number:** (503) 32 

**Date:** SIGNATURE:

epic.org EPIC-20-03-06-ICE-FOIA-20210413-3rd-Interim-Production-pt1 000585

2021-ICLI-00005 585

6/21/2019
<table>
<thead>
<tr>
<th>Printed Name and Title:</th>
<th>Phone Number:</th>
<th>Date:</th>
<th>SIGNATURE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>38. PROPERTY CUSTODIAN INFORMATION (Property Accountability)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed Name and Title:</td>
<td>Phone Number:</td>
<td>Date:</td>
<td>SIGNATURE:</td>
</tr>
<tr>
<td>39. LOCAL USE SIGNATURES (If needed)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed Name and Title:</td>
<td>Phone Number:</td>
<td>Date:</td>
<td>SIGNATURE:</td>
</tr>
<tr>
<td>Printed Name and Title:</td>
<td>Phone Number:</td>
<td>Date:</td>
<td>SIGNATURE:</td>
</tr>
</tbody>
</table>

DHS Form 1501 (9/12)
Approved!

I know we’ve got enough on the Pcard to cover that in someone’s funding. I approve.

As long as you are good with this and you approve, can you let me know she can make the purchase.

Thanks.

Sent with BlackBerry Work
(www.blackberry.com)

I just added funds to the Pcard for RAF1932 in OCC 31. I don’t think the funds for RAF1931 are on the Pcard yet. How much is the purchase?
Sent with BlackBerry Work
(www.blackberry.com)

From: [Redacted]
Date: Thursday, Jun 20, 2019, 11:37 AM
To: [Redacted]
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

had sent a message yesterday about funding. I didn’t receive it until this morning since it was sent last night.

Please note that this will also be funded through Darkweb Analytics funding string

Thank you,

[Redacted]
HSI Cyber Crimes Unit
O: 703-34
C: 202-90

Sent with BlackBerry Work
(www.blackberry.com)
We will do an ITSR waiver for it. I can stamp and approve the waiver on the PCTW when the time comes.

Thank you!

Unit Chief
HSI Child Exploitation Investigations Unit
504-60*

Hello,

Does anyone know if an ITSR has been requested for this purchase?

Thank you,

Unit Chief

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.
From: (b)(6); (b)(7)(C) ice.dhs.gov
Date: Wednesday, Jun 19, 2019, 9:40 AM
To: (b)(6); (b)(7)(C) ice.dhs.gov
Cc: ice.dhs.gov
Subject: FW: Proposed Contract for Clearview AI - Thx

Can we move forward in this contract for the facial recognition software? I'll have josh work with you to do a pctw if we are good to go.

From: (b)(6); (b)(7)(C) ice.dhs.gov
Date: Saturday, Jun 15, 2019, 3:24 AM
To: (b)(6); (b)(7)(C) ice.dhs.gov
Subject: FW: Proposed Contract for Clearview AI - Thx

From: Clearview AI
Sent: Friday, June 14, 2019 3:22 PM
To: (b)(6); (b)(7)(C) ice.dhs.gov
Subject: Proposed Contract for Clearview AI - Thx

It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,
(b)(6); (b)(7)(C)
Clearview AI
917-734-
Just a heads up, Clearview (based on our beta testing and request) has introduced a new “Export to PDF” function. It is located in the upper right corner.

You conduct your search, then click the button, then you will be able to select the images you want exported, then you click the Export button again and it will download the pdf to your computer with the original image you searched and the results you selected along with the URL to each selected result.

Face Search Results
Report prepared Jan 14, 2020

(b)(6); (b)(7)(C); (b)(7)(E)

(b)(6)

Special Agent
Homeland Security Investigations
Face Search Results
Report prepared Jan 14, 2020

(b)(6); (b)(7)(C); (b)(7)(E)
Invoice from Clearview AI, Inc

Invoice #1AEFB13F-0002

AMOUNT DUE:

[Redacted]

DATE DUE:

Oct 4, 2019

BILLED TO:

[Redacted]

Pay this invoice

SUMMARY

[Redacted]

Amount due:

[Redacted]

PAY WITH ACH OR WIRE TRANSFER

Bank name:

WELLS FARGO BANK, N.A.

Routing number:

[Redacted]

Account number:


SWIFT code:

WFBICUS6S
If you have any questions, contact Clearview AI, Inc at help@clearview.ai or call at +1 866-637-0257.

Download as PDF

Something wrong with the email? View it in your browser.
You're receiving this email because you made a purchase at Clearview AI, Inc, which partners with Stripe to provide invoicing and payments processing.
From: Clearview AI, Inc
To: (b)(6); (b)(7)(C)
Cc: help@clearview.ai
Subject: New invoice from Clearview AI, Inc #1AEFB13F-0003
Date: Thursday, September 5, 2019 2:55:42 PM

Invoice from Clearview AI, Inc

Invoice #1AEFB13F-0003

AMOUNT DUE: (b)(4)
DATE DUE: Oct 5, 2019
BILLED TO: (b)(6); (b)(7)(C)

Pay this invoice

SUMMARY

(b)(4)

Amount due $ (b)(4)

If you have any questions, contact Clearview AI, Inc at help@clearview.ai or call at +1 866-637-0257.

Download as PDF

Something wrong with the email? View it in your browser.
You're receiving this email because you made a purchase at Clearview AI, Inc, which partners with Stripe to provide invoicing and payments processing.
DATE: 09/05/2019

ACCOUNT ENDING XXXXXXXXXXX

Dear [b](6); [b](7)(C)

A transaction for your account ending [b](6); [b](7)(C) was made in the amount of USD[b](4) at CLEARVIEWAI.

If you have any questions about this email or need assistance, please contact Citi Customer Service using the phone number on the back of your card.

Regards,
Citi® Commercial Cards
Global Customer Service

PLEASE DO NOT REPLY TO THIS MESSAGE.
This email is system-generated. Please do not reply to this email as this email address is used for outbound messages only.

View your Citi® Commercial Card account information on the CitiManager® site at www.citmanager.com/login, or on CitiManager(SM) Mobile at www.citmanager.com/mobile, if enabled by your company. To change the email and SMS alerts you receive from Citi, access the CitiManager site and change your preferences under 'My Profile'. Any changes will take up to 48 hours to be reflected on your account.

Protect yourself from online fraud, or "phishing"
Remember, Citi will never ask you for your password, or to update personal or business information via email. If you receive email you believe to be suspicious or fraudulent, please forward the message to submitphishing@citi.com.
DATE: 09/05/2019
ACCOUNT ENDING XXXXXXXXXX

Dear [b](6); [b](7)(C)

A transaction for your account ending [b](6); [b](7)(C) has made in the amount of USD [b](4) at CLEARVIEWAI.

If you have any questions about this email or need assistance, please contact Citi Customer Service using the phone number on the back of your card.

Regards,
Citi® Commercial Cards
Global Customer Service

PLEASE DO NOT REPLY TO THIS MESSAGE.
This email is system-generated. Please do not reply to this email as this email address is used for outbound messages only.

View your Citi® Commercial Card account information on the CitiManager® site at www.citimanager.com/login, or on CitiManager(SM) Mobile at www.citimanager.com/mobile, if enabled by your company. To change the email and SMS alerts you receive from Citi, access the CitiManager site and change your preferences under 'My Profile'. Any changes will take up to 48 hours to be reflected on your account.

Protect yourself from online fraud, or "phishing"
Remember, Citi will never ask you for your password, or to update personal or business information via email. If you receive email you believe to be suspicious or fraudulent, please forward the message to submitphishing@citi.com.
DATE: 09/05/2019

ACCOUNT ENDING XXXXXXXXXX

Dear [b](b)(6); [b](b)(7)(C)

A transaction for your account ending [b](b)(6); [b](b)(7)(C) was made in the amount of USD[b](b)(4) at CLEARVIEWAI.

If you have any questions about this email or need assistance, please contact Citi Customer Service using the phone number on the back of your card.

Regards,
Citi® Commercial Cards
Global Customer Service

PLEASE DO NOT REPLY TO THIS MESSAGE.
This email is system-generated. Please do not reply to this email as this email address is used for outbound messages only.

View your Citi® Commercial Card account information on the CitiManager® site at www.citimanager.com/login, or on CitiManager(SM) Mobile at www.citimanager.com/mobile, if enabled by your company. To change the email and SMS alerts you receive from Citi, access the CitiManager site and change your preferences under 'My Profile'. Any changes will take up to 48 hours to be reflected on your account.

Protect yourself from online fraud, or "phishing"
Remember, Citi will never ask you for your password, or to update personal or business information via email. If you receive email you believe to be suspicious or fraudulent, please forward the message to submitphishing@citi.com.
You have been invited to Clearview! **To activate your account please click the button below:**

![Activate Account](Activate Account)

It only takes **one minute** to install and start searching.

Remember: your password must be 8 characters and contain a number.

**What's Clearview?**

Clearview is like **Google Search for faces**. Just upload a photo to the app and instantly get results from mug shots, social media, and other publicly available sources.

Our technology combines the **most accurate** facial identification software worldwide with the **single biggest** proprietary database of facial images to help you find the suspects you're looking for.

Feel free to reach out to if you have any questions, comments, or feedback. Just reply to this e-mail or contact **help@clearview.ai**

Best regards,
—Team Clearview
I hope I am sending this to the correct person. I completed the PTA for a new facial recognition tool from Clearview AI. In order to utilize this technology for the purpose of child exploitation investigations, and given the national importance of our collaboration, Clearview AI's principals have offered to work with our Agency as follows:

Please let me know if you have any additional questions.

Thanks

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 252-2099; info@ice.dhs.gov
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSCConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
### PRIVACY THRESHOLD ANALYSIS (PTA)

#### SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Project or Program Name:</th>
<th>Clearview AI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component:</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>Xacta FISMA Name (if applicable):</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Type of Project or Program:</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>Date first developed:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Date of last PTA update</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>ATO Status (if applicable)</td>
<td>Choose an item.</td>
</tr>
</tbody>
</table>

#### PROJECT OR PROGRAM MANAGER

<table>
<thead>
<tr>
<th>Name:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office:</td>
<td>Child Exploitation Investigations Unit</td>
</tr>
<tr>
<td>Title:</td>
<td>Section Chief</td>
</tr>
</tbody>
</table>
| Phone: | 503-209[phone]

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<table>
<thead>
<tr>
<th>Name:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Email:</td>
<td>Click here to enter text.</td>
</tr>
</tbody>
</table>
### SPECIFIC PTA QUESTIONS

**1. Reason for submitting the PTA: Choose an item.**

(b)(5)

<table>
<thead>
<tr>
<th>2. Does this system employ any of the following technologies?</th>
</tr>
</thead>
<tbody>
<tr>
<td>If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.</td>
</tr>
<tr>
<td>□ Closed Circuit Television (CCTV)</td>
</tr>
<tr>
<td>□ Social Media</td>
</tr>
<tr>
<td>□ Web portal (e.g., SharePoint)</td>
</tr>
<tr>
<td>□ Contact Lists</td>
</tr>
<tr>
<td>□ None of these</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. From whom does the Project or Program collect, maintain, use, or disseminate information? Please check all that apply.</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ This program does not collect any personally identifiable information</td>
</tr>
<tr>
<td>□ Members of the public</td>
</tr>
<tr>
<td>□ DHS employees/contractors (list components):</td>
</tr>
<tr>
<td>□ Contractors working on behalf of DHS</td>
</tr>
<tr>
<td>□ Employees of other federal agencies</td>
</tr>
</tbody>
</table>

1. Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.

2. DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.
4. What specific information about individuals is collected, generated or retained?

Please provide a specific description of information that is collected, generated, or retained (such as names, addresses, emails, etc.) for each category of individuals.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(a) Does the project, program, or system retrieve information by personal identifier?</td>
<td>☑️ No. Please continue to next question.  ☐️ Yes. If yes, please list all personal identifiers used:</td>
</tr>
<tr>
<td>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</td>
<td>☑️ No.  ☐️ Yes.</td>
</tr>
<tr>
<td>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td>☑️ No. Please continue to next question.  ☐️ Yes. If a log kept of communication traffic, please answer the following question.</td>
</tr>
<tr>
<td>4(f) If header or payload data(^3) is stored in the communication traffic log, please detail the data elements stored.</td>
<td>Click here to enter text.</td>
</tr>
</tbody>
</table>

---

\(^3\) When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?</td>
<td>☒ No.</td>
</tr>
<tr>
<td></td>
<td>☐ Yes. If yes, please list: Click here to enter text.</td>
</tr>
<tr>
<td>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</td>
<td>☒ No.</td>
</tr>
<tr>
<td></td>
<td>☐ Yes. If yes, please list: Click here to enter text.</td>
</tr>
<tr>
<td>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</td>
<td>Choose an item. NO Please describe applicable information sharing governance in place:</td>
</tr>
<tr>
<td>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</td>
<td>☒ No.</td>
</tr>
<tr>
<td></td>
<td>☐ Yes. If yes, please list:</td>
</tr>
<tr>
<td>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?</td>
<td>☒ No. What steps will be taken to develop and maintain the accounting: Not applicable</td>
</tr>
<tr>
<td></td>
<td>☐ Yes. In what format is the accounting maintained:</td>
</tr>
<tr>
<td></td>
<td>☐ No.</td>
</tr>
<tr>
<td></td>
<td>☐ Yes. Please indicate the determinations for each of the following:</td>
</tr>
<tr>
<td>Confidentiality:</td>
<td>☐ Low ☐ Moderate ☐ High ☐ Undefined</td>
</tr>
<tr>
<td>Integrity:</td>
<td>☐ Low ☐ Moderate ☐ High ☐ Undefined</td>
</tr>
</tbody>
</table>

---

4 PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.

4 FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
### PRIVACY THRESHOLD REVIEW

**TO BE COMPLETED BY COMPONENT PRIVACY OFFICE**

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td></td>
</tr>
</tbody>
</table>
  Please include recommendation below, including what new privacy compliance documentation is needed. |
  Click here to enter text. |

**TO BE COMPLETED BY THE DHS PRIVACY OFFICE**

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

### DESIGNATION

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Choose an item. If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>Choose an item.</td>
</tr>
<tr>
<td></td>
<td>If “other” is selected, please describe: Click here to enter text.</td>
</tr>
<tr>
<td>Determination:</td>
<td>□ PTA sufficient at this time.</td>
</tr>
<tr>
<td></td>
<td>□ Privacy compliance documentation determination in progress.</td>
</tr>
<tr>
<td></td>
<td>□ New information sharing arrangement is required.</td>
</tr>
<tr>
<td></td>
<td>DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Privacy Act Statement required.</td>
</tr>
<tr>
<td></td>
<td>Privacy Impact Assessment (PIA) required.</td>
</tr>
<tr>
<td></td>
<td>System of Records Notice (SORN) required.</td>
</tr>
<tr>
<td></td>
<td>Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
</tr>
<tr>
<td></td>
<td>A Records Schedule may be required. Contact your component Records Officer.</td>
</tr>
</tbody>
</table>

**PIA:**  | Choose an item. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>If covered by existing PIA, please list: Click here to enter text.</td>
</tr>
</tbody>
</table>

**SORN:**  | Choose an item. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>If covered by existing SORN, please list: Click here to enter text.</td>
</tr>
</tbody>
</table>

**DHS Privacy Office Comments:**  
*Please describe rationale for privacy compliance determination above.*  
Click here to enter text.
**PRIVACY THRESHOLD ANALYSIS (PTA)**

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
### PRIVACY THRESHOLD ANALYSIS (PTA)

#### SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(5)</td>
<td>(b)(7)(E)</td>
<td>(b)(5)</td>
</tr>
<tr>
<td>(b)(5)</td>
<td>(b)(7)(E)</td>
<td>(b)(5)</td>
</tr>
<tr>
<td>(b)(5)</td>
<td>(b)(7)(E)</td>
<td>(b)(5)</td>
</tr>
<tr>
<td>(b)(5)</td>
<td>(b)(7)(E)</td>
<td></td>
</tr>
</tbody>
</table>
SPECIFIC PTA QUESTIONS

(b)(5)

1 Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.
information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

PH may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in Xacta.

* FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
PRIVACY THRESHOLD REVIEW

(To be completed by Component Privacy Office)

Component Privacy Office Reviewer: \(b\)(6), \(b\)(7)(C)

Date submitted to Component Privacy Office: June 27, 2019

Date submitted to DHS Privacy Office: July 8, 2019

Component Privacy Office Recommendation:

Please include recommendation below, including what new privacy compliance documentation is needed.

(To be completed by the DHS Privacy Office)

DHS Privacy Office Reviewer:

PCTS Workflow Number:

Date approved by DHS Privacy Office:

PTA Expiration Date

DESIGNATION

Privacy Sensitive System: If "no" PTA adjudication is complete.

Category of System: If "other" is selected, please describe:

Determination:  

- PT A sufficient at this time.
- Privacy compliance documentation determination in progress.
- New information sharing arrangement is required.
<table>
<thead>
<tr>
<th>Option</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII</td>
<td>Applies.</td>
</tr>
<tr>
<td>☐ Privacy Act Statement required.</td>
<td></td>
</tr>
<tr>
<td>☐ Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td>☐ System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact</td>
<td>your component PRA Officer.</td>
</tr>
<tr>
<td>☐ A Records Schedule may be required. Contact your component Records</td>
<td>Officer.</td>
</tr>
<tr>
<td>SORN:</td>
<td>If covered by existing SORN, please list:</td>
</tr>
</tbody>
</table>

**PIA:** If covered by existing PIA, please list: __________________________

**SORN:** If covered by existing SORN, please list: __________________________

**DHS Privacy Office Comments:**

*Please describe rationale for privacy compliance determination above.*
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?</td>
<td>No.</td>
</tr>
<tr>
<td>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</td>
<td>No.</td>
</tr>
<tr>
<td>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</td>
<td>N/A</td>
</tr>
<tr>
<td>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</td>
<td>No.</td>
</tr>
<tr>
<td>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?</td>
<td>No. What steps will be taken to develop and maintain the accounting:  Yes. In what format is the accounting maintained:</td>
</tr>
</tbody>
</table>

---

4 PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.

5 FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.


---

**.privacy threshold analysis**

**version number: 01-2014**

**page 7 of 8**

---

**Privacy Threshold Review**

*(To be completed by component privacy office)*

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>Cameron Cox</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>June 27, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>October 31, 2019</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td></td>
</tr>
</tbody>
</table>

*Please include recommendation below, including what new privacy compliance documentation is needed.*

---

*(To be completed by the DHS Privacy Office)*

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
</tr>
<tr>
<td>PTA Expiration Date:</td>
</tr>
</tbody>
</table>

---

**Designation**

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>If “other” is selected, please describe:</td>
</tr>
</tbody>
</table>

**Determination:**

- □ PTA sufficient at this time.
- □ Privacy compliance documentation determination in progress.
- □ New information sharing arrangement is required.
- □ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.
- □ Privacy Act Statement required.
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td>System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
<td></td>
</tr>
<tr>
<td>A Records Schedule may be required. Contact your component Records Officer.</td>
<td></td>
</tr>
</tbody>
</table>

**PIA:**
If covered by existing PIA, please list:

**SORN:**
If covered by existing SORN, please list:

**DHS Privacy Office Comments:**
Please describe rationale for privacy compliance determination above.
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

(b)(5)

(b)(7)(E), (b)(6)
(b)(5)
5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?  
- ☒ No.  
- ☐ Yes. If yes, please list:

6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?  
- ☒ No.  
- ☐ Yes. If yes, please list:

6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?  
- ☐ N/A

7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?  
- ☒ No.  
- ☐ Yes. If yes, please list:

8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?  
- ☐ No. What steps will be taken to develop and maintain the accounting:  
- ☐ Yes. In what format is the accounting maintained:

9. Is there a FIPS 199 determination?  
- ☐ Unknown.  
- ☒ No.  
- ☐ Yes. Please indicate the determinations for each of the following:  
  - Confidentiality: [ ] Low [ ] Moderate [ ] High [ ] Undefined
  - Integrity: [ ] Low [ ] Moderate [ ] High [ ] Undefined
  - Availability: [ ] Low [ ] Moderate [ ] High [ ] Undefined

---

*PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.

*FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
### PRIVACY THRESHOLD REVIEW

**TO BE COMPLETED BY COMPONENT PRIVACY OFFICE**

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6), (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>June 27, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>October 31, 2019</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td>Please include recommendation below, including what new privacy compliance documentation is needed.</td>
</tr>
</tbody>
</table>

### DESIGNATION

**TO BE COMPLETED BY THE DHS PRIVACY OFFICE**

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
</tr>
</tbody>
</table>

### PRIVACY SENSITIVE SYSTEM

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>If &quot;no&quot; PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>If &quot;other&quot; is selected, please describe:</td>
</tr>
<tr>
<td>Determination:</td>
<td>◯ PTA sufficient at this time.</td>
</tr>
<tr>
<td></td>
<td>◯ Privacy compliance documentation determination in progress.</td>
</tr>
<tr>
<td></td>
<td>◯ New information sharing arrangement is required.</td>
</tr>
<tr>
<td></td>
<td>◯ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
</tr>
<tr>
<td></td>
<td>◯ Privacy Act Statement required.</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td>System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
<td></td>
</tr>
<tr>
<td>A Records Schedule may be required. Contact your component Records Officer.</td>
<td></td>
</tr>
</tbody>
</table>

**PIA:**
If covered by existing PIA, please list:

**SORN:**
If covered by existing SORN, please list:

**DHS Privacy Office Comments:**
*Please describe rationale for privacy compliance determination above.*
Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PIA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

(b)(5)

(b)(5): (b)(7)(E)
2. Does this system employ any of the following technologies:

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

☐ Closed Circuit Television (CCTV)
☒ Social Media
3. From whom does the Project or Program collect, maintain, use, or disseminate information?
Please check all that apply.

<table>
<thead>
<tr>
<th>Option</th>
<th>Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Web portal(^1) (e.g., SharePoint)</td>
<td></td>
</tr>
<tr>
<td>□ Contact Lists</td>
<td></td>
</tr>
<tr>
<td>□ None of these</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

\(^2\) DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

4. What specific information about individuals is collected, generated or retained?

<table>
<thead>
<tr>
<th>Question</th>
<th>Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(a) Does the project, program, or system retrieve information by personal identifier?</td>
<td>Yes, if yes, please list all personal identifiers used:</td>
</tr>
<tr>
<td>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</td>
<td>No.</td>
</tr>
<tr>
<td>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</td>
<td>N/A</td>
</tr>
</tbody>
</table>

---

This program does not collect any personally identifiable information\(^2\).
### PRIVACY THRESHOLD ANALYSIS

**Version number:** 01-2014

**Page 6 of 8**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</td>
<td>N/A</td>
</tr>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td>☒ No. Please continue to next question.</td>
</tr>
<tr>
<td><em>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</em></td>
<td></td>
</tr>
<tr>
<td>4(f) If header or payload data is stored in the communication traffic log, please detail the data elements stored.</td>
<td>☐ Yes. If a log kept of communication traffic, please answer the following question.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?</td>
<td>☒ No.</td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
<tr>
<td>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</td>
<td>☒ No.</td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
<tr>
<td>6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</td>
<td>N/A</td>
</tr>
<tr>
<td>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</td>
<td>☒ No.</td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
<tr>
<td>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures</td>
<td>☒ No. What steps will be taken to develop and maintain the accounting:</td>
</tr>
</tbody>
</table>

---

1. When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

2. PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.
### PRIVACY THRESHOLD REVIEW

**TO BE COMPLETED BY COMPONENT PRIVACY OFFICE**

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>June 27, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>October 31, 2019</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td>Please include recommendation below, including what new privacy compliance documentation is needed.</td>
</tr>
</tbody>
</table>

**TO BE COMPLETED BY THE DHS PRIVACY OFFICE**

| DHS Privacy Office Reviewer: | |

---

1. **FIPS 199** is the *Federal Information Processing Standard* Publication 199, *Standards for Security Categorization of Federal Information and Information Systems* and is used to establish security categories of information systems.

---

<table>
<thead>
<tr>
<th>of PII to individuals who have requested access to their PII?</th>
<th>Yes. In what format is the accounting maintained:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Unknown.</td>
</tr>
<tr>
<td></td>
<td>☑ Yes. Please indicate the determinations for each of the following:</td>
</tr>
<tr>
<td>Confidentiality:</td>
<td>☐ Low ☐ Moderate ☐ High ☐ Undefined</td>
</tr>
<tr>
<td>Integrity:</td>
<td>☐ Low ☐ Moderate ☐ High ☐ Undefined</td>
</tr>
<tr>
<td>Availability:</td>
<td>☐ Low ☐ Moderate ☐ High ☐ Undefined</td>
</tr>
</tbody>
</table>
**Homeland Security**

**Privacy Threshold Analysis**

**Version number:** 01-2014

<table>
<thead>
<tr>
<th>DESIGNATION</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>If &quot;no&quot; PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>If &quot;other&quot; is selected, please describe:</td>
</tr>
</tbody>
</table>

**Determination:**

- ☐ PTA sufficient at this time.
- ☐ Privacy compliance documentation determination in progress.
- ☐ New information sharing arrangement is required.
- ☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.
- ☐ Privacy Act Statement required.
- ☐ Privacy Impact Assessment (PIA) required.
- ☐ System of Records Notice (SORN) required.
- ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.
- ☐ A Records Schedule may be required. Contact your component Records Officer.

**PIA:**

- If covered by existing PIA, please list:

**SORN:**

- If covered by existing SORN, please list:

**DHS Privacy Office Comments:**

*Please describe rationale for privacy compliance determination above.*
Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PIA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717
PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
### SPECIFIC PTA QUESTIONS

1. **Reason for submitting the PTA:** New PTA

   - (b)(5)

   - (b)(5), (b)(7)(E)

   - (b)(5), (b)(7)(E)
2. Does this system employ any of the following technologies:

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

☐ Closed Circuit Television (CCTV)
☒ Social Media
### 3. From whom does the Project or Program collect, maintain, use, or disseminate information?

**Please check all that apply.**

- □ Web portal\(^1\) (e.g., SharePoint)
- □ Contact Lists
- □ None of these
- □ This program does not collect any personally identifiable information\(^2\)
  - ✗ Members of the public
  - ✓ DHS employees/contractors (list components): ICE
  - □ Contractors working on behalf of DHS
  - □ Employees of other federal agencies

### 4. What specific information about individuals is collected, generated or retained?

#### 4(a) Does the project, program, or system retrieve information by personal identifier?

- ✗ No.
- □ Yes. If yes, please list all personal identifiers used:

#### 4(b) Does the project, program, or system use Social Security Numbers (SSN)?

- ✗ No.
- □ Yes.

#### 4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:

N/A

---

1. Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.

2. DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII which, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SII and PII are treated the same.
### Privacy Threshold Analysis

**Version number:** 01-2014

**Page 6 of 8**

<table>
<thead>
<tr>
<th>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td></td>
</tr>
<tr>
<td>☑ No. Please continue to next question.</td>
<td></td>
</tr>
<tr>
<td>□ Yes. If a log kept of communication traffic, please answer the following question.</td>
<td></td>
</tr>
<tr>
<td>4(f) If header or payload data is stored in the communication traffic log, please detail the data elements stored.</td>
<td></td>
</tr>
</tbody>
</table>

| 5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems? |
| ☑ No. |
| □ Yes. If yes, please list: |

| 6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems? |
| ☑ No. |
| □ Yes. If yes, please list: |

| 6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)? |
| N/A |

| 7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel? |
| ☑ No. |
| □ Yes. If yes, please list: |

| 8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures |
| ☑ No. What steps will be taken to develop and maintain the accounting: |

---

1 When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

2 PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in Xacta.
9. Is there a FIPS 199 determination?**

☐ Yes. In what format is the accounting maintained:

☐ Unknown.

☒ No.

☐ Yes. Please indicate the determinations for each of the following:

Confidentiality:

☐ Low ☐ Moderate ☐ High ☐ Undefined

Integrity:

☐ Low ☐ Moderate ☐ High ☐ Undefined

Availability:

☐ Low ☐ Moderate ☐ High ☐ Undefined

---

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:

[b], [b][c]

Date submitted to Component Privacy Office: June 27, 2019

Date submitted to DHS Privacy Office: October 31, 2019

Component Privacy Office Recommendation:

Please include recommendation below, including what new privacy compliance documentation is needed.

---

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:

---

** FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
### DESIGNATION

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>If “other” is selected, please describe:</td>
</tr>
<tr>
<td>Determination:</td>
<td></td>
</tr>
<tr>
<td>PT A sufficient at this time.</td>
<td></td>
</tr>
<tr>
<td>Privacy compliance documentation determination in progress.</td>
<td></td>
</tr>
<tr>
<td>New information sharing arrangement is required.</td>
<td></td>
</tr>
<tr>
<td>DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
<td></td>
</tr>
<tr>
<td>Privacy Act Statement required.</td>
<td></td>
</tr>
<tr>
<td>Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td>System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
<td></td>
</tr>
<tr>
<td>A Records Schedule may be required. Contact your component Records Officer.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PIA:</th>
<th>If covered by existing PIA, please list:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SORN:</td>
<td>If covered by existing SORN, please list:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DHS Privacy Office Comments:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please describe rationale for privacy compliance determination above.</td>
</tr>
</tbody>
</table>
From: (b)(6); (b)(7)(C) @ice.dhs.gov
Date: Thursday, Jun 20, 2019, 11:42 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

I just added funds to the Pcard for RAF1932 in OCC 31. I don’t think the funds for RAF1931 are on the Pcard yet. How much is the purchase?

Sent with BlackBerry Work
(www.blackberry.com)

From: (b)(6); (b)(7)(C) @ice.dhs.gov
Date: Thursday, Jun 20, 2019, 11:37 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

(b)(6) had sent a message yesterday about funding. I didn’t receive it until this morning since it was sent last night.

Please note that this will also be funded through Darkweb Analytics funding string

Thank you,

(b)(6); (b)(7)(C)

Unit Chief
HSI Cyber Crimes Unit
O: 703-344- (b)(6)
C: 202-903- (b)(7)(C)
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

No Alternate finder for the Pcard. [b]I knew I would be out of the loop so I should have asked you to send them yesterday. Unfortunately, I’m not sure how much funding CEIU has on the Pcard funding document. What are you buying and how much is it?

[b](b)(6), (b)(7)(C)

Sent with BlackBerry Work
(www.blackberry.com)
The [b](4) for Clearview AI have been purchased. There was a slight delay due to ITSR stamp and transaction completion on Clearview end on this one. Total cost [b](4) is expected.

From EPCTW:
SOR 31/ MDL 18

Please reach out to [b](b)(6); (b)(7)(C) at Clearview at your convenience to activate the licenses as before.

Please let me know when to move forward with Paliscope...the last message received regarding this purchase was on 8/30/19 (below) and it looks like it was pending a quote? I have not initiated an EPCTW for it yet.

[b](b)(6); (b)(7)(C)

What pot of $ will these come out of?
I am out of town but will get to this as soon as I am able.

Thx, [b](b)(6); (b)(7)(C)

From: [b](b)(6); (b)(7)(C)
Date: Friday, Aug 30, 2019, 12:57 PM
To: [b](b)(6); (b)(7)(C) @ice.dhs.gov
Cc: [b](b)(6); (b)(7)(C) @ice.dhs.gov
Subject: Additional Clearview AI purchase and Paliscope purchase.

[b](b)(6); (b)(7)(C)

I was asked by [b](b)(6); (b)(7)(C) to put together quotes for 3 additional Clearview Licenses and 10 Paliscope licenses. See below. I am still waiting to hear back from Paliscope, but I wanted to give
you what I had at this point.

Clearview AI

Vendor name: Clearview AI
Vendor POC: [redacted]
Vendor phone: [redacted]
Vendor Address: 15 West 72nd St. - [redacted]
New York, NY 10023

Paliscope

Vendor name: Paliscope
Vendor POC: [redacted]
Vendor phone: [redacted]
Vendor Address: 11320 Random Hills Road, Fairfax, VA 22030
Vendor POC: [b](6), [b](7)(C)
Vendor phone: (pending)
Vendor Address: (pending)

[b](6), [b](7)(C)

Special Agent
Homeland Security Investigations
I talked to Clearview and worked on some additional language to use on the justification. Not sure if this is needed or will help but I thought I would send it to you anyway.

Given the national importance of our collaboration, Clearview AI's principals have offered to work with our Agency as follows:

Excellent. Thank you. I will let you know when the purchase takes place.
To: [redacted]@ice.dhs.gov
Cc: [redacted]@ice.dhs.gov

Subject: RE: Clearview Contract Proposal

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

[redacted]

From: [redacted]@ice.dhs.gov
Sent: Wednesday, June 19, 2019 3:17 PM
To: [redacted]@ice.dhs.gov
Cc: [redacted]@ice.dhs.gov

Subject: RE: Clearview Contract Proposal

Here you go

Requestor= Section Chief [redacted]
Best phone number for requestor: (503) 205-6543
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: [redacted]
Vendor phone: 917-738-2021
Vendor Address: 15 West 72nd St. New York, NY 10023

From: [redacted]@ice.dhs.gov
Sent: Wednesday, June 19, 2019 3:10 PM
To: [redacted]@ice.dhs.gov
Cc: [redacted]@ice.dhs.gov

Subject: Clearview Contract Proposal

Hello [redacted]

I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor= you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview?-please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-6555

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]
Date: Tuesday, February 18, 2020 7:27:43 PM

Thanks for the introduction.

Great to meet you.

Would be great to connect by phone when you have a chance.

Please let me know what works for you.

Best,

[REDACTED]

On Feb 18, 2020, at 4:52 PM [REDACTED] wrote:

I thought I had done this before, but if I haven’t then I apologize. I am cc’ing you on a message with [REDACTED], who is currently a Section Chief with HSI Child Exploitation Unit and will soon likely be the Unit Chief for CEIU. Essentially overseeing all of the child exploitation programs under HSI and is also a chair on the INTERPOL working group. With my assistance, [REDACTED] Unit is working to get Clearview approved through DHS Privacy Section, which could open up the use of Clearview for many different departments.

Anyway, I wanted to make this introduction as I know you two will likely be interacting in the near future.
Hello everyone,

Can we do a call at, let's say, 3pm? I'm happy to talk to you all then. I'm also happy to do after Jan 6 if that works better for you.

On Mon, Dec 23, 2019 at 10:36 AM, Offill wrote:

Good Morning

It looks like we are available anytime between 2:30 and 4. If that doesn’t work for you it looks like we may need to push the call until the week of Jan 6.

Thanks,

Mobile: 202-870

From: clearview.ai>
Sent: Monday, December 23, 2019 10:19 AM
To: @ice.dhs.gov>
Cc: @ice.dhs.gov>; @ice.dhs.gov>

Subject: Re: Clearview Legal questions

Hello

A call on this afternoon would be good. We can also talk sometime after Christmas. What time works best for you?
On Fri, Dec 20, 2019 at 10:30 AM goodmorning@ice.dhs.gov> wrote:

Good Morning

My name is and I'm a privacy analyst at ICE. We are working up the compliance documentation to be reviewed by the Privacy Office at the Department of Homeland Security and ran across a few questions we were hoping you might be able to help us with.

1. Does the web scraper you use to collect images possibly scrape from EU citizens and EU countries? Other countries with their own privacy laws?

   a. If so, how are you staying compliant with those country privacy laws? Particularly the consent requirements in Art 14 of GDPR?
   b. Since it’s your proprietary database, are you required to allow individuals the right of erasure? To notify them who you are selling their information to?

2. Do you keep images of minors? Are there any additional protections for a minor’s information?

   a. How does Clearview remain compliant with the varying laws around the collection/processing of children’s information

If you think this is best handled in a call we are available Monday afternoon.

Thanks for your help,

Mobile: 202-87

From:
Sent: Thursday, December 19, 2019 4:05 PM
To:
clearview.ai
clearview.ai
Cc:
k@ice.dhs.gov
Subject: RE: Clearview Legal questions

Sent with BlackBerry Work (www.blackberry.com)
From: [b](6), [b](7)(C) <clearview.ai>

Date: Thursday, Dec 19, 2019, 1:04 PM

To: [b](6), [b](7)(C) <ice.dhs.gov>, [b](6), [b](7)(C) <clearview.ai>, [b](6), [b](7)(C) <clearview.ai>

Subject: Re: Clearview Legal questions

Yes.

And to [copied]

On Dec 19, 2019, at 2:53 PM, [b](6), [b](7)(C) <ice.dhs.gov> wrote:

You want me to refer him to you?

---

From: [b](6), [b](7)(C) <ice.dhs.gov>

Sent: Thursday, December 19, 2019 4:35 AM

To: [b](6), [b](7)(C) <ice.dhs.gov>, [b](6), [b](7)(C) <ice.dhs.gov>, [b](6), [b](7)(C) <ice.dhs.gov>

Subject: Clearview Legal questions

Good Morning [b](6), [b](7)(C)

The HSI Privacy lead has some legal questions on Clearview’s collection techniques, particularly in regards to other countries’ privacy laws. Is there someone at Clearview we might be able to speak to so that we can get quick answers? Thanks for the help.

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement

Desk: 202-732-3300
Mobile: 202-8...
Main: 202-732-3300

--

Regards,

Clearview AI

949-27...

--

Regards

Clearview AI

949-278
Sent with BlackBerry Work (www.blackberry.com)

From: (b)(6); (b)(7)(C)
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: Re: Clearview Legal questions
Date: Thursday, December 19, 2019 4:05:17 PM

From: (b)(6); (b)(7)(C)
Date: Thursday, Dec 19, 2019, 1:04 PM
To: (b)(6); (b)(7)(C)
Subject: Re: Clearview Legal questions

Yes (b)(6); (b)(7)(C) copied)

On Dec 19, 2019, at 2:53 PM, (b)(6); (b)(7)(C) wrote:

You want me to refer him to you?

Sent: Thursday, December 19, 2019 4:35 AM
To: (b)(6); (b)(7)(C)
Subject: Clearview Legal questions

Good Morning (b)(6); (b)(7)(C)

The HSI Privacy lead has some legal questions on Clearview's collection techniques, particularly in regards to other countries' privacy laws. Is there someone at Clearview we might be able to speak to so that we can get quick answers? Thanks for the help.

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-
Main: 202-732-
Good Morning All,

DHS Privacy has heard ICE is using Clearview and wants to be briefed. Any chance I could get your responses to the PTA back this week? I've attached the previous version just in case.

Best,

Good Afternoon Everyone,

I wanted to check on the status of this. Let me know if you have any questions or I can help with anything. Thanks.

Best,

Good Afternoon All,

Please edit for accuracy. Thanks again.

Best,
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSCConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

(b)(5)
SPECIFIC PTA QUESTIONS

(b)(5)
3 When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.
5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?  
   - [ ] No.  
   - [ ] Yes. If yes, please list:

6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?  
   - [ ] No.  
   - [ ] Yes. If yes, please list:

6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?  
   - N/A

7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?  
   - [ ] No.  
   - [ ] Yes. If yes, please list:

8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?  
   - [ ] No. What steps will be taken to develop and maintain the accounting:  
   - [ ] Yes. In what format is the accounting maintained:

9. Is there a FIPS 199 determination?  
   - [ ] Unknown.  
   - [ ] No.  
   - [ ] Yes. Please indicate the determinations for each of the following:
      - Confidentiality:  
        - [ ] Low  
        - [ ] Moderate  
        - [ ] High  
        - [ ] Undefined  
      - Integrity:  
        - [ ] Low  
        - [ ] Moderate  
        - [ ] High  
        - [ ] Undefined  
      - Availability:

---

4 PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in Xacta.  
4 FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
### PRIVACY THRESHOLD REVIEW

*(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)*

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>June 27, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>October 31, 2019</td>
</tr>
</tbody>
</table>

**Component Privacy Office Recommendation:**

Please include recommendation below, including what new privacy compliance documentation is needed.

*(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)*

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

### DESIGNATION

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Choose an item. If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>Choose an item. If “other” is selected, please describe: Click here to enter text.</td>
</tr>
</tbody>
</table>

| Determination: | |
|----------------|-------------------------------------------------
|                | □ PTA sufficient at this time. |
|                | □ Privacy compliance documentation determination in progress. |
|                | □ New information sharing arrangement is required. |
|                | □ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. |
| Privacy Act Statement required. |
| Privacy Impact Assessment (PIA) required. |
| System of Records Notice (SORN) required. |
| Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. |
| A Records Schedule may be required. Contact your component Records Officer. |

**PIA:** Choose an item.
If covered by existing PIA, please list: Click here to enter text.

**SORN:** Choose an item.
If covered by existing SORN, please list: Click here to enter text.

**DHS Privacy Office Comments:**
*Please describe rationale for privacy compliance determination above.*

Click here to enter text.
From: [b](6); [b](7)(C)
To: [b](6); [b](7)(C)
Subject: RE: Clearview
Date: Monday, October 7, 2019 4:44:00 PM
Attachments:

RE: Clearview
Monday, October 7, 2019 4:42 PM
To: bice.dhs.gov>
Subject: Clearview

When you have a second can you send me all of the Clearview acquisition documents for these licenses. I am not able to get them right at this moment and am hoping you can get them to me in the morning?

I'd appreciate it.

[b](6); [b](7)(C)

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations
September 3, 2019

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
Homeland Security Investigations

INVOICE

This invoice is for the provision of Clearview AI’s proprietary technology, search system and investigative tools to Homeland Security Investigations as follows:

- Service & Quantity: 3 User-Accounts
- Service Duration: 12 Months

Each Account Includes:

- Unlimited Use of Clearview’s Investigative Tools
- Unlimited Use of Clearview’s Proprietary Search System
- Smartphone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive):

Best regards,

917-734
From: [b](6), [b](7)(C)
To: [b](6), [b](7)(C)
Cc: [b](6), [b](7)(C)
Subject: Additional Clearview Al purchase and Paliscope purchase.
Date: Friday, August 30, 2019 12:57:56 PM

I was asked to put together quotes for 3 additional Clearview Licenses and 10 Paliscope licenses. See below. I am still waiting to hear back from Paliscope, but I wanted to give you what I had at this point.

**Clearview Al**

**Price:** [b](4)

Requestor= Section Chief
Best phone number for requestor: (503) 209 [b](6)
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview Al
Vendor POC: [b](6), [b](7)(C)
Vendor phone: 917-734 [b](6)
Vendor Address: 15 West 72nd St. [b](6), [b](7)(C)

New York, NY 10023

**Paliscope**

**Price:** [b](4)

(estimate based on web site advertised pricing and today’s conversion rate)
Justification: Paliscope is online investigation software that will help collect data, secure its integrity and generate a shareable, professional report of the investigation. This software will allow C3 investigators to quickly conduct opensource internet research and quickly compartmentalize, store and distribute pertinent information to field offices as it relates to leads being distributed by CEIU.

Requestor: Section Chief

Best phone number for requestor: (503) 2

Ship to address 11320 Random Hills Road, Fairfax, VA 22030

Vendor name: Paliscope

Vendor POC: 

Vendor phone: (pending)

Vendor Address: (pending)
September 3, 2019

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
Homeland Security Investigations

INVOICE

This invoice is for the provision of Clearview AI’s proprietary technology, search system and investigative tools to Homeland Security Investigations as follows:

- Service & Quantity: 3 User-Accounts
- Service Duration: 12 Months

Each Account Includes:

- Unlimited Use of Clearview’s Investigative Tools
- Unlimited Use of Clearview’s Proprietary Search System
- Smartphone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive):

Best regards,

917-7
Approved!

HSI Cyber Crimes Unit
202-903

I know we’ve got enough on the Pcard to cover that in someone’s funding. I approve.

As long as you are good with this and you approve, can you let me know she can make the purchase.

Thanks.

Sent with BlackBerry Work (www.blackberry.com)

I just added funds to the Pcard for RAF1932 in OCC 31. I don’t think the funds for RAF1931 are on the Pcard yet. How much is the purchase?
Sent with BlackBerry Work
(www.blackberry.com)

From @ice.dhs.gov>
Date: Thursday, Jun 20, 2019, 11:37 AM
To @ice.dhs.gov>
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

I had sent a message yesterday about funding. I didn’t receive it until this morning since it was sent last night.

Please note that this will also be funded through Darkweb Analytics funding string

Thank you,

Unit Chief
HSI Cyber Crimes Unit
O: 703-344
C: 202-903

From @ice.dhs.gov>
Sent: Thursday, June 20, 2019 11:34 AM
To @ice.dhs.gov>
Subject: RE: Acknowledge Receipt of Requisition Number 192119VHQ4CCC0010

No Alternate finder for the Pcard knew I would be outdo he should have asked you to send them yesterday. Unfortunately, I’m not sure how much funding CEIU has on the Pcard funding document. What are you buying and how much is it?

Sent with BlackBerry Work
(www.blackberry.com)
From: [b](6); [b](7)(C)
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: RE: Proposed Contract for Clearview AI - Thx
Date: Wednesday, June 19, 2019 6:17:55 PM

Please note that this will also be funded through Darkweb Analytics funding string [b](7)(E)

Thank you,

[b](6); [b](7)(C)

Unit Chief
HSI Cyber Crimes Unit
O: 703-5 [b](6)
C: 202-9 [b](7)(C)

Sent: Wednesday, June 19, 2019 3:05 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: RE: Proposed Contract for Clearview AI - Thx

I have given an FYI to [b](5) for allocation purposes. Happy to complete the EPCTW once I have the details to complete it. Will keep you posted.

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 598-0006

From: [b](6); [b](7)(C)
Sent: Wednesday, June 19, 2019 2:54 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: Review: Proposed Contract for Clearview AI - Thx

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
Subject: FW: Proposed Contract for Clearview Al - Thx

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.

----

Unit Chief
HSI Child Exploitation Investigations Unit
504-609-ice

From: ice.dhs.gov
Date: Wednesday, Jun 19, 2019, 9:40 AM
To: ice.dhs.gov
Cc: ice.dhs.gov
Subject: FW: Proposed Contract for Clearview Al - Thx

Can we move forward in this contract for the facial recognition software? I'll have work with to do a pctw if we are good to go.

Unit Chief
HSI Child Exploitation Investigations Unit
Homeland Security Investigations

From: ice.dhs.gov
Date: Saturday, Jun 15, 2019, 3:24 AM
To: ice.dhs.gov
Subject: FW: Proposed Contract for Clearview Al - Thx

From: clearview.ai>
Sent: Friday, June 14, 2019 3:22 PM
To: ice.dhs.gov>
Subject: Proposed Contract for Clearview Al - Thx
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

[b][6];
[b][7(C)]

[b][6]; [b][7(C)]

Clearview AI
917-734[b][6];
June 14, 2019

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations

Dear Section Chief,

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

• Service & Quantity: 3 User-Accounts
• Service Duration: 12 Months

Each Account Includes:

• Unlimited Use of Clearview’s Proprietary Search System
• Unlimited Access to Clearview’s Proprietary Image Database
• iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive)

Best regards,

917-734-
Please note that this will also be funded through Darkweb Analytics funding string

(b)(7)(E)

Thank you,

(b)(6); (b)(7)(C)

Unit Chief
HSI Cyber Crimes Unit
O: 703-599
C: 202-90

I have given an FYI for allocation purposes. Happy to complete the EPCTW once I have the details to complete it. Will keep you posted.

(b)(6); (b)(7)(C)

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO), It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.

Subject: FW: Proposed Contract for Clearview AI - Thx

Can we move forward in this contract for the facial recognition software? I’ll have work with to do a pctw if we are good to go.

Subject: Proposed Contract for Clearview AI - Thx
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

[Redacted]

Clearview AI
917-734 [Redacted]
From: (b)(6); (b)(7)(C)
To: (b)(6); (b)(7)(C)
Subject: RE: Clearview Contract Proposal
Date: Wednesday, June 19, 2019 3:23 PM

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

(b)(6); (b)(7)(C)

---

From: (b)(6); (b)(7)(C)
Sent: Wednesday, June 19, 2019 3:17 PM
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: RE: Clearview Contract Proposal

Here you go

Requestor: Section Chief (b)(6); (b)(7)(C)
Best phone number for requestor: (503) 201-6876
Ship to address: 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: (b)(6); (b)(7)(C)
Vendor phone: 917-734-2093
Vendor Address: 15 West 72nd St. - (b)(6); (b)(7)(C)
New York, NY 10023

From: (b)(6); (b)(7)(C)
Sent: Wednesday, June 19, 2019 3:10 PM
To: (b)(6); (b)(7)(C)
C: (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: Clearview Contract Proposal

Hello (b)(6); (b)(7)(C)

I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor= you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview?-please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

(b)(6); (b)(7)(C)

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-
From: [Redacted]
To: [Redacted]
Subject: RE: Clearview Contract Proposal
Date: Wednesday, June 19, 2019 3:57:59 PM

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

From: [Redacted]
Sent: Wednesday, June 19, 2019 3:23 PM
To: [Redacted]@ice.dhs.gov
Cc: [Redacted]@ice.dhs.gov
Subject: RE: Clearview Contract Proposal

Here you go

Requestor= Section Chief
Best phone number for requestor: (503) 209
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: [Redacted]
Vendor phone: 917-734
Vendor Address: 15 West 72nd St.
New York, NY 10023

From: [b](6); [b](7)(C)
Sent: Wednesday, June 19, 2019 3:10 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: Clearview Contract Proposal

Hello [b](6); [b](7)(C)

I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor= you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview?-please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

[b](6); [b](7)(C)

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
From: [REDACTED]
Sent: 19 Jun 2019 22:17:53 +0000
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed Contract for Clearview AI - Thx

Please note that this will also be funded through Darkweb Analytics funding string

Thank you,

[REDACTED]

Unit Chief
HSI Cyber Crimes Unit
O: 703-344 [REDACTED]
C: 202-903 [REDACTED]

From: [REDACTED]
Sent: Wednesday, June 19, 2019 3:05 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed Contract for Clearview AI - Thx

I have given an FYI to [REDACTED] for allocation purposes. Happy to complete the EPCTW once I have the details to complete it. Will keep you posted.

[REDACTED]

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599 [REDACTED]

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.

From: [REDACTED]
Sent: Wednesday, June 19, 2019 2:54 PM
To: [REDACTED]
Cc: [REDACTED]

Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached. I'll confirm the funding piece but I think we are going to be good to move forward.

Can we move forward in this contract for the facial recognition software? I'll have my work cut out for me to do a pttw if we are good to go.

It was a pleasure talking earlier today.

Attended is the Proposed Contract for Clearview AI.
Very much look forward to working together!

Best regards,

Clearview AI
917-73~
From: lb)(6); (b)(7)(C)
Sent: 19 Jun 2019 18:54:05 +0000
To: lb)(6); (b)(7)(C)
Cc: 
Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached. lb)(6) will confirm the funding piece but I think we are going to be good to move forward.

From: lb)(6); (b)(7)(C)
Date: Wednesday, Jun 19, 2019, 9:40 AM
To: lb)(6); (b)(7)(C)
Cc: 
Subject: FW: Proposed Contract for Clearview AI - Thx

Can we move forward in this contract for the facial recognition software? I'll have josh work with Pam to do a pctw if we are good to go.

From: lb)(6); (b)(7)(C)
Date: Saturday, Jun 15, 2019, 3:24 AM
To: lb)(6); (b)(7)(C)
Subject: FW: Proposed Contract for Clearview AI - Thx

From: lb)(6); (b)(7)(C)
Sent: Friday, June 14, 2019 3:22 PM
To: lb)(6); (b)(7)(C)
Subject: Proposed Contract for Clearview AI - Thx
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

Clearview AI
917-73
June 14, 2019

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations

Dear Section Chief,

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

- Service & Quantity: 3 User-Accounts
- Service Duration: 12 Months

Each Account Includes:

- Unlimited Use of Clearview’s Proprietary Search System
- Unlimited Access to Clearview’s Proprietary Image Database
- iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive)

Best regards,

917-734

[Redacted information]
# Invoice

**Clearview AI, Inc**

+1 866-637-0257

**Invoice**

- **Invoice number**: 1AEF13F-0001
- **Date of issue**: Jun 20, 2019
- **Date due**: Jun 25, 2019

**Billing to:**

- (b)(6); (b)(7)(C)

**Due June 25, 2019**

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Amount due**: (b)(4)

---

**Pay with ACH or wire transfer**

- **Bank**: WELLS FARGO BANK, N.A.
- **Routing**: (b)(6); (b)(7)(C)
- **Account**: __________
- **SWIFT**: WFBIUS6S

**Pay with card**

Visit [pay.stripe.com/invoice/invst_xoUWDxKxDoFKgEmj8rYTWhk6zi](https://pay.stripe.com/invoice/invst_xoUWDxKxDoFKgEmj8rYTWhk6zi)

**Questions?** Call Clearview AI, Inc at +18666370257.
From: [b](6); [b](7)(C)
Sent: 19 Jun 2019 19:57:58 +0000
To: [b](6); [b](7)(C)
Subject: RE: Clearview Contract Proposal

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

From: [b](6); [b](7)(C)
Sent: Wednesday, June 19, 2019 3:17 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: RE: Clearview Contract Proposal

Here you go

Requestor: Section Chief [b](6); [b](7)(C)
Best phone number for requestor: (503) 205-[b](6)
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: [b](6); [b](7)(C)
Vendor phone: 917-734-[b](6)
Vendor Address: 15 West 72nd St., New York, NY 10023
I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor= you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview? - please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
# Receipt

**Clearview AI, Inc**

+1 866-637-0257

**Receipt number**: 2444-2455  
**Invoice number**: 1AEFB13F-0001  
**Date paid**: June 21, 2019  
**Payment method**: VISA

Paid by: **ICE.DHS.GOV**

Paid on June 21, 2019

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td>1</td>
<td>(b)(4)</td>
</tr>
</tbody>
</table>

Amount paid: (b)(4)

**Questions? Call Clearview AI, Inc at +18666370257.**
Invoice from Clearview Al, Inc

Billed to (b)(6), (b)(7)(C)
Invoice #1AEFB13F-0001

INVOICE PAID
USD paid Jun 21, 2019

Download as PDF...
Download receipt
Download invoice

<table>
<thead>
<tr>
<th>DESCRIPTION</th>
<th>PRICE</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td>(b)(4)</td>
<td>(b)(4)</td>
</tr>
</tbody>
</table>

Amount due (b)(4)

If you have any questions, contact Clearview Al, Inc at hoan@clearview.ai or call at (866) 637-0257.

Invoicing by Stripe
Clearview Al, Inc partners with Stripe to provide secure invoicing and payments processing.
June 14, 2019

Dear Section Chief (b)(6); (b)(7)(C)

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

- Service & Quantity: 3 User-Accounts
- Service Duration: 12 Months

Each Account Includes:

- Unlimited Use of Clearview’s Proprietary Search System
- Unlimited Access to Clearview’s Proprietary Image Database
- iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive) (b)(4)

Best regards,

917-734-(b)(6); (b)(7)(C)
June 14, 2019

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations

Dear Section Chief Burke,

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

• Service & Quantity: 3 User-Accounts
• Service Duration: 12 Months

Each Account Includes:

• Unlimited Use of Clearview’s Proprietary Search System
• Unlimited Access to Clearview’s Proprietary Image Database
• iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive) 

Best regards,

917-734
Please note that this will also be funded through Darkweb Analytics funding string

(b)(7)(E)

Thank you,

Unit Chief
HSI Cyber Crimes Unit
O: 703-344-
C: 202-903-

Sent: Wednesday, June 19, 2019 3:05 PM
To: ice.dhs.gov>
Cc: ice.dhs.gov>

I have given an FYI to for allocation purposes. Happy to complete the EPCTW once I have the details to complete it. Will keep you posted.

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached will confirm the funding piece but I think we are going to be good to move forward.

Unit Chief
HSI Child Exploitation Investigations Unit
504-60

From
Date: Wednesday, Jun 19, 2019, 9:40 AM
To
Cc

Subject: FW: Proposed Contract for Clearview AI - Thx

Can we move forward in this contract for the facial recognition software? I’ll have josh work to do a pctw if we are good to go.

Child Exploitation Investigations Unit
Homeland Security Investigations

From
Date: Saturday, Jun 15, 2019, 3:24 AM
To

Subject: FW: Proposed Contract for Clearview AI - Thx

From
Sent: Friday, June 14, 2019 3:22 PM
To

Subject: Proposed Contract for Clearview AI - Thx
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

(b)(6); (b)(7)(C)

Clearview AI
917-734-
From: [b](6); [b](7)(C)
To: [b](6); [b](7)(C)
Subject: RE: Clearview Contract Proposal
Date: Wednesday, June 19, 2019 3:57:59 PM

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

From: [b](6); [b](7)(C)
Sent: Wednesday, June 19, 2019 3:23 PM
To: [b](6); [b](7)(C) dhs.gov>
Cc: [b](6); [b](7)(C) ice.dhs.gov>
Subject: RE: Clearview Contract Proposal

Here you go

Requestor= Section Chief [b](6); [b](7)(C)
Best phone number for requestor: (503) 209 [b](6)
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: [b](6); [b](7)(C)
Vendor phone: 917-734- [b](6)
Vendor Address: 15 West 72nd St. [b](6); [b](7)(C)
Hello (b)(6); (b)(7)(C)

I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor= you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview?-please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid “need-to-know” without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
# Receipt

**Clearview AI, Inc**

+1 866-637-0257

Paid by: [Redacted]

Paid on June 21, 2019

**Description**: Yearly Subscription to Clearview

<table>
<thead>
<tr>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(4)</td>
<td>(b)(4)</td>
<td>(b)(4)</td>
</tr>
</tbody>
</table>

**Payment method**: VISA

**Invoice number**: 1AEFB13F-0001

**Date paid**: June 21, 2019

**Receipt number**: 2444-2455

Questions? Call Clearview AI, Inc at +18666370257.
June 14, 2019

Section Chief
Child Exploitation Investigations Unit
Homeland Security Investigations

Dear Section Chief,

Contract Proposal

Clearview AI proposes to provide its proprietary technology, database and investigative tools to Homeland Security Investigations as follows:

• Service & Quantity: 3 User-Accounts
• Service Duration: 12 Months

Each Account Includes:

• Unlimited Use of Clearview’s Proprietary Search System
• Unlimited Access to Clearview’s Proprietary Image Database
• iPhone and/or Desktop Versions of Clearview Program for Each User-Account

Total Annual Fee (All inclusive)

Best regards,

[Redacted]
From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed Contract for Clearview AI - Thx
Date: Wednesday, June 19, 2019 6:17:55 PM

Please note that this will also be funded through Darkweb Analytics funding string

Thank you,

[REDACTED]

Unit Chief
HSI Cyber Crimes Unit
O: 703-344-0158
C: 202-903-3594

From:
Sent: Wednesday, June 19, 2019 3:05 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed Contract for Clearview AI - Thx

I have given an FYI to Margie for allocation purposes. Happy to complete the EPCTW once I have the details to complete it. Will keep you posted.

[REDACTED]

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599-__

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.

From: UCI Child Exploitation Investigations Unit
      Homeland Security Investigations

Date: Wednesday, Jun 19, 2019, 9:40 AM

To: UCI Child Exploitation Investigations Unit

Subject: FW: Proposed Contract for Clearview AI - Thx

Can we move forward in this contract for the facial recognition software? I'll have Josie do a pctw if we are good to go.

From: Child Exploitation Investigations Unit
      Homeland Security Investigations

Date: Saturday, Jun 15, 2019, 3:24 AM

To: Child Exploitation Investigations Unit

Subject: FW: Proposed Contract for Clearview AI - Thx

From: Proposed Contract for Clearview AI - Thx

Sent: Friday, June 14, 2019 3:22 PM

To: Proposed Contract for Clearview AI - Thx

Subject: Proposed Contract for Clearview AI - Thx
It was a pleasure talking earlier today.

Attached is the Proposed Contract for Clearview AI.

Very much look forward to working together!

Best regards,

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Clearview AI
917-73

(b)(6); (b)(7)(C)
From: [REDACTED]
To: [REDACTED]
Subject: RE: Clearview Contract Proposal
Date: Wednesday, June 19, 2019 3:23 PM

Thank you, that was quick!

Can you send me the detailed justification?

Thanks again,

[REDACTED]

From: [REDACTED]
Sent: Wednesday, June 19, 2019 3:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Clearview Contract Proposal

Here you go

Requestor= Section Chief
Best phone number for requestor: (503) 204
Ship to address 11320 Random Hills Road, Fairfax, VA 22030
Vendor name: Clearview AI
Vendor POC: [REDACTED]
Vendor phone: 917-734
Vendor Address: 15 West 72nd St.
From: (b)(6), (b)(7)(C)
Sent: Wednesday, June 19, 2019 3:10 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: Clearview Contract Proposal

Hello,

I am going to be creating the Purchase Card transaction paperwork for the Clearview Contract proposal. Here is the info I will need:

Requestor = you?
Best phone number for requestor
Ship to address (even if it is a download, need the physical address)
Vendor name (Clearview?- please verify)
Vendor POC
Vendor phone
Vendor Address

Detailed justification for purchase.

I think that is it. If you can get that info to me, I will have it ready once the allocator and approver give their blessings.

Thank you,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. §552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid “need to know” without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.
From: [redacted]
To: [redacted]
Subject: RE: Clement Whitepaper and more
Date: Monday, February 24, 2020 5:00:00 PM
Attachments: [redacted]

Attached you will find the list of known HSI users. As discussed, I would like to move forward with Admin rights over these accounts so we can have Headquarters/CEIU oversight.

Thanks for your help on this.

[redacted]

<table>
<thead>
<tr>
<th>Section Chief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cyber Crimes Center (C3)</td>
</tr>
<tr>
<td>DHS - ICE</td>
</tr>
<tr>
<td>Cell: (503) [redacted]</td>
</tr>
</tbody>
</table>

From: [redacted]
Sent: Friday, February 21, 2020 10:50 AM
To: [redacted]
Cc: [redacted]
Subject: Whitepaper and more

Attached:

1 - Independent Accuracy Test (only for confidential review)
2 - Legal white paper
3 - Code of Conduct

Thanks
<table>
<thead>
<tr>
<th>Location</th>
<th>Agency</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pensacola, FL</td>
<td>HSI</td>
<td>Homeland Security Investigations</td>
</tr>
<tr>
<td>HSI - El Paso</td>
<td>DHS (ICE)</td>
<td>Homeland Security Investigations</td>
</tr>
<tr>
<td>HS - U.S. Embassy Rome</td>
<td>Homeland Security Investigations</td>
<td></td>
</tr>
<tr>
<td>HS - Utah</td>
<td>Homeland Security Investigations</td>
<td></td>
</tr>
<tr>
<td>HS - El Paso</td>
<td>Homeland Security Investigations</td>
<td></td>
</tr>
<tr>
<td>JFK Border Enforcement</td>
<td>JFK Border Enforcement Security Task Force (HSI)</td>
<td></td>
</tr>
<tr>
<td>JFK Border Enforcement</td>
<td>homeland security investigations</td>
<td></td>
</tr>
<tr>
<td>Agency</td>
<td>Location</td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>---------------------</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Pensacola, FL</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Billings, MT</td>
<td></td>
</tr>
<tr>
<td>HSI CFA</td>
<td>Lubbock, TX</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>C3</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>El Paso, TX</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>JFK-NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Pittsburg, PA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>El Paso</td>
<td></td>
</tr>
<tr>
<td>ERO</td>
<td>Hartford, CT</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>San Bernardino, CA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NTC</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>El Paso, TX</td>
<td></td>
</tr>
<tr>
<td>HSI CFA</td>
<td>C3</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>West Valley, UT</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Baltimore, MD</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>San Bernardino, CA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Cleveland, OH</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Anchorage, AK</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Williston, VT</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Irving, TX</td>
<td></td>
</tr>
<tr>
<td>HSI</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Rome, Italy</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Nogales, AZ</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Buffalo, NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>San Jose, CA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Newark, NJ</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>San Francisco, CA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>New Orleans, LA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Ho Chi Minh City</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Detroit, MI</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Baltimore, MD</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>New Orleans, LA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Odgen, UT</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Albuquerque, NM</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>El Paso, TX</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Toronto, Canada</td>
<td></td>
</tr>
<tr>
<td>HSI</td>
<td>Dalton, GA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Mount Laurel, NJ</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Roosevelttown, NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI TFO</td>
<td>Grand Island, NE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI TFO</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Long Beach, CA</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Baltimore, MD</td>
<td></td>
</tr>
<tr>
<td>HSI IRS</td>
<td>Newark, NJ</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Location</td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td>---------------------------------</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI-Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI-Special Agent</td>
<td>S. George, UT</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>El Paso, TX</td>
<td></td>
</tr>
<tr>
<td>HSI-Special Agent</td>
<td>NY</td>
<td></td>
</tr>
<tr>
<td>HSI-Special Agent</td>
<td>Largo, FL</td>
<td></td>
</tr>
<tr>
<td>UNKNOWN</td>
<td>CE COLOCATION EL PASO</td>
<td></td>
</tr>
<tr>
<td>Foreign Service National</td>
<td>US EMBASSY OTTAWA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Nashville Field Office</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>AMPA SOCOM</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>CANBERRA OFFICE Australia</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>SAINT LOUIS FILE CONTROL OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>AINT LOUIS FILE CONTROL OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>Frederick MD</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>McCallen Tx</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>CEIU</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Portland OR</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>PROVO OFFICE UT</td>
<td></td>
</tr>
<tr>
<td>HSI-CFA</td>
<td>LUBBOCK OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>BOSTON FIELD OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>PORTLAND ME HSI OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>ICE COLOCATION EL PASO</td>
<td></td>
</tr>
<tr>
<td>HSI-Deputy Assistant Secretary</td>
<td>OPE/HSAC</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>VAT Atlanta</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>BAKERSFIELD PROCESSING CENTER</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Frederick - MD</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>ICE COLOCATION EL PASO</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>ICE RAPID CITY SD</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>BOSTON FIELD OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>ICE COLOCATION SAN ANTONIO</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>LONG BEACH OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>VNY - NEW YORK OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>ELO - EL PASO OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>CEIU</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>VNY - NEW YORK OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>VNY - NEW YORK OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>MEMPHIS OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI RAC</td>
<td>BRADENTON OFFICE FL</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>PCN DC</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>SPRINGFIELD FEDERAL BLDG, MA</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>PLANTATION FL</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>BOSTON OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>VAT Atlanta</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>JFK HALMAR BLDG</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>BOISE SUB-OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>SAN BERNARDINO OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>NEW YORK OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>MOUNT LAUREL NJ ERO</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>BOSTON FIELD OFFICE</td>
<td></td>
</tr>
<tr>
<td>HSI-IRS</td>
<td>DEA Las Cruces, NM</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Bakersfield Processing</td>
<td></td>
</tr>
<tr>
<td>HSI Special Agent</td>
<td>Baton Rouge</td>
<td></td>
</tr>
</tbody>
</table>
Awesome!!!!!

> On Sep 5, 2019, at 3:01 PM, [redacted] wrote:
> It worked!!! Thank you!

> ----- Original Message ----- 
> From: [redacted] 
> Sent: Thursday, September 5, 2019 2:53 PM 
> To: [redacted] 
> Cc: [redacted] 
> Subject: Re: For credit card transaction 
> 
> Re-sent it to you, please let me know 
> 
> Thanks 

> On Sep 5, 2019, at 2:53 PM, [redacted] wrote:
> Sounds good. I will watch for it.
>
> Thank you,
>
> ----- Original Message ----- 
> From: [redacted] 
> Sent: Thursday, September 5, 2019 12:21 PM 
> To: [redacted] 
> Cc: [redacted] 
> Subject: Re: For credit card transaction 
> 
> We will send you another invoice to try, and if that doesn't work look at a different Credit Card processor 
>
> Thanks 

On Sep 5, 2019, at 11:44 AM [redacted] wrote:

Hello,

I am not sure if you were on the emails yesterday afternoon or this morning, but the invoice link does not like the info I have entered. It says that the security code is incorrect. I checked with our national credit card admins and they say all is well on our end. Are you able to send a new invoice? I have entered the correct code.

Please note our billing zip is 20598. Our shipping zip is 22030. Not sure if that is the reason it is not working.
Standing by to re-try whenever you say it is all set.

Thank you,

---

Original Message

From: [redacted]

Sent: Wednesday, September 4, 2019 1:55 PM

To: [redacted]

Cc: [redacted]

Subject: Re: For credit card transaction

Sent you the invoice earlier today. Let me know if it works for you.

Thanks

---

On Sep 3, 2019, at 2:51 PM, [redacted] wrote:

Hi [redacted]

From HSI is planning to purchase 3 Clearview user accounts (see below).

Please provide her with the info she needs to process the purchase by credit card.

Many thanks!

---

Begin forwarded message:

From: [redacted]

Subject: Invoice

Date: September 3, 2019 at 2:36:32 PM EDT

To: [redacted]

---

InInvoice - ICE - Sept. 3, 2019 .pdf

> <Receipt-2442-2418 Clearview AI SEP 19.pdf>
Hi,

If Clearview is the only FRT used by C3, I’d say most of these questions we already covered.

(b)(5)

(b)(5) rcced (b)(6), who will be on the call this afternoon. Let us know if we can help with anything.

Sent with BlackBerry Work
(www.blackberry.com)

Have we already addressed these questions in regards to our recent privacy request?

(b)(6)

(b)(7)(C)

Will you be able to answer these questions regards to your project?

All- I will be unavailable for the call today so I am asking to cover for me. If they don’t have the answers that are raised we will have to answer post call.
Thank you for taking my call today. You probably have the attached document, we just want to make sure we know where C3 is at for the questions below:

1. Has your component used FRT in fiscal years 2018, 2019, and/or 2020? Examples include:
   - Use of owned or leased FRT
   - Use of FRT maintained by other federal, state, local, or tribal entities
   - FRT services/assistance received from another federal, state, local, or tribal entity
   - FRT services from a private company
   - Pilot programs that include FRT

2. If yes, please describe how the FRT was used and for what purpose(s).

3. Does your component have plans to use other types of FRT, or to use existing FRT for purposes other than those already mentioned?

4. Has your component awarded grants to state, local, or tribal agencies that could be used for FRT?
   a. If so, what information/data is available on grants awarded during fiscal years 2015 through 2019 that could help identify whether the grant was used for FRT?

5. Is your component’s use of FRT covered by Privacy Act System of Record Notices (SORNs) and/or Privacy Impact Assessments (PIAs)?

Thank you,

National Program Manager
Law Enforcement Information Sharing Initiative (LEISI)
Operational Technology and Cyber Division
DHS | ICE | Homeland Security Investigations
500 12th Street, S.W., Washington, D.C. 20536

Warning: This email and any attachments are UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid “need-to-know” without prior approval of an authorized DHS official. No portion of this email should be furnished to the media, either in written or verbal form. If you are not an intended recipient or believe you have received this communication in error,
You should have a setup email in your inbox. Please create your account and you’ll be able to start doing searches

Feel free to reach out if you get stuck along the way

Thanks
Team Clearview

OFFICIAL DISCLAIMER
Search results established through Clearview AI and its related systems and technologies are indicative and not definitive. Clearview AI, Inc. makes no guarantees as to the accuracy of its search-identification software. Law enforcement professionals MUST conduct further research in order to verify identities or other data generated by the Clearview AI system. Clearview AI is neither designed nor intended to be used as a single-source system for establishing the identity of an individual. Furthermore, Clearview AI is neither designed nor intended to be used as evidence in a court of law.

On September 30, 2019, 2:46 PM EDT, dhs.gov wrote:

Yeahhhhh!! You’re the best

Hope you had a safe flight back

Sent with BlackBerry Work
(www.blackberry.com)
Special Agent
Homeland Security Investigations
From: (b)(6), (b)(7)(C)
To: 
Cc: 
Subject: RE: Image Analysis Referral (b)(7)(E)
Date: Friday, December 20, 2019 1:51:03 PM

Clearview match:

From: NCMEC.ORG>
Sent: Friday, December 20, 2019 10:48 AM
To: (b)(6), (b)(7)(C)
Cc: #HSIVictimID <HSIVictimID@ice.dhs.gov>, NCMEC.ORG> (b)(6), (b)(7)(C)
Subject: Image Analysis Referral - Cricket

Hello SA (b)(7)(E)

I have also attached a copy of NCMEC’s Best Practices document, excel sheet of all the user’s posts and a crop of the child’s face. We are referring this case to you in hopes that you are able to identify the depicted male.

I’ve CC’d my supervisor and program manager, (b)(6), (b)(7)(C) in case you have questions when I am not in the office.

Please let me know if you have any questions or need any additional information, thank you!

Very Respectfully,
(b)(6), (b)(7)(C)
Analyst II, CVIP
National Center for Missing & Exploited Children
(585) 254-7333
CONFIDENTIALITY NOTICE--This e-mail is intended for the sole use of the individual or entity to which it is addressed and may contain confidential and sensitive material. This message is for the sole use of the intended recipient(s). Any review, distribution or copying of this communication by others is strictly prohibited. If you are not an intended recipient and received this communication in error, please notify the sender by return e-mail and delete this message and any attachments. Thank you.
I have completed the purchase. Receipt attached.

Thanks for all your help with the payment logistics.

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 599

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or oral form.

Attached is the Clearview AI invoice.

As discussed, I’m connecting you to a who can handle your credit card payment.

Hoan first needs to check to make sure she can make the payment via Stripe. Once she has done that, she’ll provide you with her Agency’s credit card info so you can process the payment to Clearview AI.

Thanks for all your help!

Best regards,

917-734
Clearview AI, Inc

+1 866-637-0257

Paid by [b](6); [b](7)(C)

ice.dhs.gov

[b](4) paid on June 21, 2019

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly Subscription to Clearview</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Questions? Call Clearview AI, Inc at +18666370257.
Thank you.

From: [redacted]
Sent: Thursday, June 20, 2019 3:50 PM
To: ice.dhs.gov
Subject: RE: ITSR question

I would say yes. It’s a software license it seems.

Computer Forensic Analyst
DHS-ICE-HSI Cyber Crimes Center (C3)
11320 Random Hills Rd., Suite 400
Fairfax, VA 22030
Office: 703-29

From: [redacted]
Sent: Thursday, June 20, 2019 3:33 PM
To: ice.dhs.gov
Subject: ITSR question

Hi

I have been asked to make a p-card purchase from Clearview AI. The justification is below in two parts. Do you think this would need an ITSR stamp? I am relatively new at this and I am unsure. I created the epctw and have received emailed approvals from

Thanks

From: [redacted]
Sent: Thursday, June 20, 2019 10:25 AM
To: ice.dhs.gov
Cc: @ice.dhs.gov
Subject: RE: Clearview Contract Proposal
I talked to Clearview and worked on some additional language to use on the justification. Not sure if this is needed or will help but I thought I would send it to you anyway.

Given the national importance of our collaboration, Clearview AI's principals have offered to work with our Agency as follows:

(b)(5); (b)(7)(E)
Hi,

This is great! I will take a look and get back to you shortly. Thanks.

I hope I am sending this to the correct person. I completed the PTA for a new facial recognition tool from Clearview AI. In order to utilize this technology for the purpose of child exploitation investigations, and given the national importance of our collaboration, Clearview AI's principals have offered to work with our Agency as follows:

Please let me know if you have any additional questions.

Thanks,

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 202-6157 | ice.dhs.gov
Good afternoon,

It's good to meet you. 

Feel free to contact me if you have any questions or concerns.

Best,

(b)(6); (b)(7)(C)

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732- (b)(6);
Mobile: 202-87-
Main: 202-732-

Going to be the POC on this PTA and will be reaching out to you shortly.

Thanks so much.

From: b(6); (b)(7)(C)
Sent: Thursday, June 27, 2019 10:48 AM
To: b(6); (b)(7)(C)

PRIVACY THRESHOLD ANALYSIS (PTA) UPDATE

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 202-343-1717.
### PRIVACY THRESHOLD ANALYSIS (PTA) UPDATE

#### SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Project or Program Name:</th>
<th>National Child Victim Identification System 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component:</td>
<td>Immigration and Customs Enforcement (ICE)</td>
</tr>
<tr>
<td>Office or Program:</td>
<td>Homeland Security Investigations</td>
</tr>
<tr>
<td>TAFISMA Name:</td>
<td>National Child Victim Identification System 2</td>
</tr>
<tr>
<td>TAFISMA Number:</td>
<td>ICE 06602-MAJ-06602</td>
</tr>
<tr>
<td>Type of Project or Program:</td>
<td>Program</td>
</tr>
<tr>
<td>Project or program status:</td>
<td>Development</td>
</tr>
</tbody>
</table>

#### PROJECT OR PROGRAM MANAGER

<table>
<thead>
<tr>
<th>Name:</th>
<th>(b)(6), (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office:</td>
<td>HSI-C3</td>
</tr>
<tr>
<td>Title:</td>
<td>Section Chief</td>
</tr>
<tr>
<td>Phone:</td>
<td>703-344</td>
</tr>
<tr>
<td>Email:</td>
<td>(b)(6), (b)(7)(C)</td>
</tr>
</tbody>
</table>

#### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

<table>
<thead>
<tr>
<th>Name:</th>
<th>Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone:</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>

#### ROUTING INFORMATION

<table>
<thead>
<tr>
<th>Date submitted to Component Privacy Office:</th>
<th>Click here to enter a date.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>
SPECIFIC PTA UPDATE QUESTIONS

1. Describe the changes and/or upgrades planned for this system that are triggering this PTA Update:

   Please provide a general description of the changes or upgrades using non-technical language and highlighting any changes involving or affecting Personally Identifiable Information (PII).

   The National Child Victim Identification System Version 2 (NCVIS 2), owned by Homeland Security Investigations (HSI) within U.S. Immigration & Customs Enforcement (ICE), is an application that assists federal, state, local, and international law enforcement agencies during investigations of child sexual exploitation crimes, specifically those involving images of child exploitation. NCVIS 2 maintains a repository of electronic images of child exploitation submitted by law enforcement agencies. These images may capture the faces or other features of the victims of these crimes and, in some cases, the violators. The primary purpose of NCVIS 2 is to provide a means of connecting law enforcement personnel seeking to identify child victims in an image with law enforcement personnel who have already identified the victim in the image.

   NCVIS published a Privacy Impact Assessment in 2009 and a PIA Update in 2012 based on a Privacy Threshold Analysis completed at that time. This PTA update is being submitted to document the fact that the technology NCVIS uses to identify images has been upgraded. The collection of information (images of child victims and, in some cases, violators) remains the same, the purpose for the collection remains the same (helping law enforcement resolve cases of child exploitation), and the output remains the same (potential matches of images). No additional personally identifiable information is being obtained or shared; the sole change is improvement in the speed and accuracy with which potential matches of images are made based on technological improvements.

   The technology that NCVIS uses to compare digital images and video relies on exact binary hash matches (matching the unique “signature” of images expressed numerically), photoDNA, which matches pixels of different images and enables a human user to make the final determination that one image is the same as another, and an algorithm incorporating color, texture and pattern matches among images. The technologies can be used alone or in combination. The latter two require human review, although all matches are reviewed by NCVIS personnel. Improvements in the technology will permit NCVIS personnel to make these matches more quickly and with greater confidence.
2. Project or Program status

<table>
<thead>
<tr>
<th>Date first developed:</th>
<th>August 21, 2009</th>
<th>Date last updated:</th>
<th>2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled deployment of changes/upgrades:</td>
<td>Ongoing</td>
<td>Degree of confidence in schedule:</td>
<td>□ High&lt;br&gt;□ Medium&lt;br&gt;□ Low&lt;br&gt;□ Deploy date is unknown at this time</td>
</tr>
<tr>
<td>Name of system change/upgrade (e.g., EARM v 3.0):</td>
<td>NCVIS Version 2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. Is this project a technology/system that relates solely to infrastructure? For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?

□ Yes (Stop here. Submit PTA Update.)
× No (Continue with next question.)

4. Does the system currently contain PII about individuals, including ICE and DHS personnel, contractors, aliens, criminal suspects, or members of the public? (TAFISMA identifies which systems in the ICE inventory contain PII.)

□ Yes (images only, which are not identifying by themselves)
□ No

5. Are the system changes/upgrades limited to “bug fixes” only?

□ Yes (Stop here. Submit PTA Update.)
× No (Continue with next question.)

6. Do the changes/upgrades affect (either add or subtract) the types of individuals about whom the system collects, processes, or retains PII? Please check all that apply.

× No.
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7. Do the changes/upgrades pertain to Social Security Numbers (SSNs)?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ No. The project will continue to collect/use SSNs as before.</td>
<td>☒ No. SSNs are not now and will not be collected or used (full or partial).</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Yes. Check the applicable box below:</td>
<td></td>
</tr>
<tr>
<td>□ The SSN will no longer be collected or used.</td>
<td></td>
</tr>
<tr>
<td>□ Full SSNs will no longer be collected or used; instead only partial SSNs (last 4) will be used.</td>
<td></td>
</tr>
<tr>
<td>□ SSNs will now be collected or used. Check which:</td>
<td></td>
</tr>
<tr>
<td>☐ Full</td>
<td>☐ Partial</td>
</tr>
</tbody>
</table>

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8. Other than the SSN, do the changes/upgrades affect (either add or subtract) the PII that is collected, created, processed, or retained in the system? Please check all that apply.</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>☒ No.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Yes. New types of data about individuals will be created or added.</td>
<td></td>
</tr>
<tr>
<td>&lt;Please describe the data and its source.&gt;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Yes. Data previously collected about individuals will no longer be collected.</td>
<td></td>
</tr>
<tr>
<td>&lt;Please describe the data.&gt;</td>
<td></td>
</tr>
</tbody>
</table>
### 9. Do the changes/upgrades alter the way the PII is used, or change the reason we are maintaining it or operating the system generally?

- No
- Yes

*<Please describe.>*

### 10. Do the changes/upgrades impact connections with other IT systems, either within or outside of ICE? For example, are system connections being added or terminated? Is the system being migrated from a stand-alone environment to the ICE network?

- No
- Yes

*<Please describe the IT connections affected and how they are affected.>*

### 11. Do the changes/upgrades affect how or why data about individuals will be shared within ICE, within DHS, or outside of DHS? This would include an increase or decrease in the amount of data shared, or sharing with new partners, or adding categories of new system users. Please check all that apply.

- No.
- Yes. Changes how or why data will be shared within ICE.

*<Please describe the changes.>*

- Yes. Changes how or why data will be shared within DHS.

*<Please describe the data.>*

- Yes. Changes how or why data will be shared outside of DHS.

*<Please describe the changes.>*

### 12. Do the changes/upgrades result in the system obtaining information from any new source?

- No
- Yes
### 13. Will the changes/upgrades add to the system new analytical capabilities or other tools that will analyze or use PII?

- [ ] No
- [ ] Yes

**<Please describe.>**

### 14. What is the date of the most recent ATO for the system?

- TBD

### 15. Will the system changes/upgrades require an update to the C&A?

- [ ] No
- [ ] Yes

### 16. What is the FIPS 199 determination for the as-is environment:

<table>
<thead>
<tr>
<th>Confidentiality:</th>
<th>Low</th>
<th>Moderate</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrity:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Availability:</td>
<td></td>
<td>Low</td>
<td>Moderate</td>
</tr>
</tbody>
</table>

**Will the FIPS 199 categorizations need to be updated due to the system changes/upgrades?**

- [ ] No
- [ ] Yes

**If yes, identify the new (or expected) FIPS 199 categorization for the future state:**

<table>
<thead>
<tr>
<th>Confidentiality:</th>
<th>Low</th>
<th>Moderate</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrity:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Availability:</td>
<td></td>
<td>Low</td>
<td>Moderate</td>
</tr>
</tbody>
</table>
Designation

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Yes</th>
<th>If “no” PTA Update adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>IT System</td>
<td>If “other” is selected, please describe: Click here to enter text.</td>
</tr>
<tr>
<td>Determination:</td>
<td>□ PTA Update sufficient at this time.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Privacy compliance documentation determination in progress.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ New information sharing arrangement is required.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Privacy Act Statement required.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>✗ Privacy Impact Assessment (PIA) required.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ System of Records Notice (SORN) required.</td>
<td></td>
</tr>
<tr>
<td>PIA:</td>
<td>System covered by existing PIA</td>
<td></td>
</tr>
<tr>
<td></td>
<td>If covered by existing PIA, please list: DHS/ICE/PIA-010(a) - National Child Victim Identification System (NCVIS)</td>
<td></td>
</tr>
<tr>
<td>SORN:</td>
<td>Choose an item.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>If covered by existing SORN, please list: Click here to enter text.</td>
<td></td>
</tr>
<tr>
<td>DHS Privacy Office Comments:</td>
<td>Please describe rationale for privacy compliance determination above.</td>
<td></td>
</tr>
</tbody>
</table>

ICE Privacy submits this PTA update to discuss a technical upgrade to NCVIS. This upgrade does not change the collection, use, maintenance, or dissemination of information. All matches still require review by NVCIS personnel. The existing NCVIS PIA continues to provide coverage for this system.
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSCConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Project or Program Name</th>
<th>HSI and Face Detection and Recognition Algorithm Test &amp; Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component:</td>
<td>Science and Technology (S&amp;T)</td>
</tr>
<tr>
<td>Office or Program:</td>
<td>Resilient Systems Division</td>
</tr>
<tr>
<td>Xacta FISMA Name (if applicable):</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Xacta FISMA Number (if applicable):</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Type of Project or Program:</td>
<td>Program</td>
</tr>
<tr>
<td>Project or program status:</td>
<td>Non-Operational</td>
</tr>
<tr>
<td>Date first developed:</td>
<td>March 12, 2015</td>
</tr>
<tr>
<td>Pilot launch date:</td>
<td>July 1, 2016</td>
</tr>
<tr>
<td>Date of last PTA update</td>
<td>March 23, 2015</td>
</tr>
<tr>
<td>Pilot end date:</td>
<td>July 1, 2017</td>
</tr>
<tr>
<td>ATO Status (if applicable):</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>ATO expiration date (if applicable):</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

### PROJECT OR PROGRAM MANAGER

<table>
<thead>
<tr>
<th>Name:</th>
<th><a href="6">b</a>, <a href="7">b</a>(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office:</td>
<td>Resilient Systems Division</td>
</tr>
<tr>
<td>Title:</td>
<td>Program Manager</td>
</tr>
<tr>
<td>Phone:</td>
<td>202-25</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="6">b</a>, <a href="7">b</a>(C)</td>
</tr>
</tbody>
</table>

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<table>
<thead>
<tr>
<th>Name:</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Email:</td>
<td>Click here to enter text.</td>
</tr>
</tbody>
</table>
SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Choose an item.

DHS S&T Resilient Systems Division (RSD) and DHS Homeland Security Investigations (HSI), Cyber Crimes Center (C3), Child Exploitation Investigations Unit (CEIU) are collaborating on a new project in imagery analytics related to facial and object detection, clustering and recognition. DHS C3 CEIU’s mission is to bring justice to consumers, producers and distributors of child pornography, as well as to predators engaging in child sex tourism. Currently, DHS HSI C3 CEIU has capability gaps in image and video management and tools to identify victims and perpetrators of these crimes, such as face recognition, that can significantly improve the efficiency of investigators and, more importantly, increase the number of identifications and rescues of child victims as well as the prosecutions of perpetrators.

The Project will entail the use of technology to view and match faces from explicit visual and textual data (i.e., file names) in the form of images and videos which are likely to depict child sexual abuse. These images and videos will be extracted from the National Victim Identification System (NVCIS) maintained at the HSI C3 CEIU. The Project is intended to develop requirements, concepts of operation, and ultimately solutions and technology that will assist HSI in identifying perpetrators and victims in sources of unlawful child pornography and human exploitation.

DHS S&T intends to use face detection and recognition algorithms on the NCVIS data to test and evaluate current algorithms available on the market today. The desired end result is an integration of the best performing algorithms (i.e., those that result in the highest number of accurate facial recognition matches) into the existing “HSI NetClean” forensic tool. S&T is partnering with the National Institutes of Standards and Technology (NIST) to conduct the testing. NIST has extensive biometric and facial recognition test and evaluation expertise, and will use that knowledge to determine the best performing algorithms for HSI investigations to use in their current forensic tool. NIST’s subject matter experts who will participate in the testing process are all federal government employees.

A number of privacy and security measures are being implemented to conduct this test and evaluation effort as outlined below.

The following data organization and testing will occur during this effort:

Phase I -- four HSI Special Agents currently assigned to positions which include ongoing access to child exploitation investigations will be selected to deploy to the HSI C3 CEIU to select the subset of data from NCVIS to be utilized for testing. Using the HSI NetClean tool, these agents will then annotate the electronic images with bounding boxes (selection box drawn around a face) around faces using a set of parameters to maintain consistency. This effort is referred to as “ground-truthing” or creating an accurate baseline. The ground truth personnel will review files within NCVIS to select files useful for the effort based on the following criterion:

   a) There is a visible face or faces within the material
   b) The face is such a pose to fall within the test parameters
   c) There are other image or videos within the data believed to depict the same person

The ground-truthing effort will be quality controlled by a research scientist from Pacific Northwest National Laboratory (PNNL), US Department of Energy (DOE), who has extensive experience ground-
truthing visual data, specifically faces and is a federal government employee. The quality control effort will consist of reviewing the annotations provided by the ground-truthers to ensure consistency and reduce error. This effort will require the involved personnel to physically access and view the data in order to annotate and quality control the annotations. In addition DHS S&T Program Manager Patricia Wolfhope will view portions of the data as the overall Program Manager for this effort.

This effort will result in two identical underlying sets of data, however one set will be annotated with bounding boxes and comments containing notes relevant to the facial detection testing, while the other will be raw or without any annotations. These sets will be hereafter referred to as Set A (annotated data) and Set B (raw data). The same personnel involved in establishing Set A will also manually identify which pictures contain the same faces.

The ground-truthing effort will last approximately 90 days from commencement.

Phase II includes scientists from the NIST deploying to C3 and applying the current state-of-the-art face detection and recognition algorithms against Set B data. Set A data will be utilized to check the performance rates and accuracy of the algorithms. This phase is expected to take approximately 180 days. This will involve utilizing the data against several different algorithms to evaluate detection, clustering and recognition. NIST personnel will require access to the data files and folders, but will NOT be required to view the data during the test. NIST personnel will only view the exterior folders that the data is being held in and will direct the testing software to those folders. HSI and DHS S&T personnel will be required to view the data during this phase to evaluate the performance of the algorithms.

The following protocols will be utilized in order to reduce the risk level in regards to privacy and data loss concerns:

a) Prior to testing, HSI will complete a Proposal to Use Real Data for Testing (PRDT) and submit it to the Privacy Office and Chief Information Security Officer for review and approval of the protocols used to protect the test data from NCVIS.

b) An HSI Special Agent will be in physical custody of the data at all times.

c) All activity which requires access to the data will occur at the HSI Cyber Crimes Center in access controlled and secured environments. The NCVIS data used for this test will never leave C3 facilities.

d) The data (sets A and B) will be stored on a portable Network Attached Storage (NAS) device. The device will be used only for this effort and will not contain other data unrelated to the test or be accessible to persons not authorized to be involved in the test. When not in use for the test, the NAS will be stored in the access controlled and secured HSI Victim Identification Laboratory (VI Lab) at HSI C3.

e) The NAS will be hand carried by an HSI Special Agent to and from the VI Lab and the testing location within C3 (currently the 4th Floor Operations Room).

f) The data on the NAS device will not be encrypted because use of encryption for this test was determined to not be feasible because encryption requires the process of encrypting and decrypting the data which creates slow transfer rates and causes bottlenecks for data read/write operations.
g) Only government personnel from HSI, S&T, DOE/PNNL and NIST with an official requirement to have access to the data will be granted access.

h) All access to data will be under the direct supervision of an HSI Special Agent.

i) At the conclusion of Phase II the data will be permanently deleted from the NAS using current secure deletion mechanisms available to C3. The process will be completed by C3 CEIU personnel and documented with a certificate of destruction.

j) At the conclusion of Phase II all computer systems used for Phase I and II will be securely wiped using current secure wiping mechanisms available to C3. For Phase I the systems will be C3 systems. For Phase II the systems will be NIST systems. The process of securely wiping will be completed by C3 CEIU personnel and documented in a memorandum for recordkeeping.

2. Does this system employ any of the following technologies:

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

☐ Closed Circuit Television (CCTV)
☐ Social Media
☐ Web portal¹ (e.g., SharePoint)
☐ Contact Lists
☒ None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information?

Please check all that apply.

☐ This program does not collect any personally identifiable information²
☒ Members of the public
☐ DHS employees/contractors (list components):
☐ Contractors working on behalf of DHS
☐ Employees of other federal agencies

¹ Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.

² DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.
### 4. What specific information about individuals is collected, generated or retained?

HSI manages and maintains a collection of still photos and videos of children under 18 being sexually abused in its National Victim Identification System (NCVIS). A small subset of the data maintained in NCVIS will be used to test face detection and recognition algorithms. In most cases, the identities of the children and perpetrators are not known. In situations where the identity of the child is known to HSI, the identity will not be released to DHS S&T, DOE/PNNL or NIST. An estimated size of the dataset to be used in this effort is less than 1% of the existing NCVIS database.

The immediate goal for this project is to determine how well face detection and recognition algorithms work on seized data specific to child exploitation investigations and to integrate those algorithms into the current HSI NetClean forensic tool. The data will be under the supervision or control of HSI agents at all times during test and evaluation activities. The HSI data will be permanently deleted from the test and evaluation equipment at the conclusion of the effort, before the equipment leaves HSI facilities.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Please continue to next question.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(a) Does the project, program, or system retrieve information by personal identifier?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</td>
<td></td>
<td></td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</td>
<td></td>
<td></td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4(f) If header or payload data(^3) is stored in the communication traffic log, please detail the data elements stored.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^3\) When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.
5. **Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ No.</td>
<td></td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
</tbody>
</table>

Click here to enter text.

6. **Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ No.</td>
<td></td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
</tbody>
</table>

Click here to enter text.

6(a) **Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?**

Choose an item.

Please describe applicable information sharing governance in place:

7. **Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ No.</td>
<td></td>
</tr>
<tr>
<td>☐ Yes. If yes, please list:</td>
<td></td>
</tr>
</tbody>
</table>

Click here to enter text.

8. **Per NIST SP 800-53 Rev. 4, Appendix J,does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ No.</td>
<td>What steps will be taken to develop and maintain the accounting: No disclosures will be made as part of this effort.</td>
</tr>
<tr>
<td>☐ Yes. In what format is the accounting maintained:</td>
<td></td>
</tr>
</tbody>
</table>

9. **Is there a FIPS 199 determination?**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Unknown.</td>
<td></td>
</tr>
<tr>
<td>☒ No.</td>
<td></td>
</tr>
<tr>
<td>☐ Yes. Please indicate the determinations for each of the following:</td>
<td></td>
</tr>
</tbody>
</table>

---

*PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.

*FIPS 199 is the [Federal Information Processing Standard](https://www.nist.gov/fips/fips199) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.*
<table>
<thead>
<tr>
<th>Confidentiality:</th>
<th>Low</th>
<th>Moderate</th>
<th>High</th>
<th>Undefined</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrity:</td>
<td>Low</td>
<td>Moderate</td>
<td>High</td>
<td>Undefined</td>
</tr>
<tr>
<td>Availability:</td>
<td>Low</td>
<td>Moderate</td>
<td>High</td>
<td>Undefined</td>
</tr>
</tbody>
</table>
PRIVACY Threshold Review

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>March 12, 2015</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>May 14, 2015</td>
</tr>
</tbody>
</table>

Component Privacy Office Recommendation:
Please include recommendation below, including what new privacy compliance documentation is needed.

A meeting was held at HSI offices on April 2, 2015. Attendees included the DHS Director of Privacy Compliance and her staff, the ICE Privacy Officer, HSI agents, an attorney from the ICE Office of the Principal Legal Advisor, and the S&T Program Manager and Privacy Officer. At the meeting HSI explained the need for the technology, and why it would be extremely difficult to develop a separate dataset using volunteers. Reasonable parents would not permit their children to volunteer to mimic graphically explicit behaviors. And publishing a Request for Proposals for such an activity would trigger extensive criticisms and questions.

In most cases, the preference is to use test data for research and development purposes. This is one of the few cases where creating or obtaining test datasets is not a reasonable solution.

DHS S&T is working in partnership with Homeland Security Investigations and NIST to test face detection and recognition algorithms. HSI owns the data. And ICE/HSI has published a PIA covering this data: DHS/ICE/PIA-010(a) - National Child Victim Identification System (NCVIS). The data will stay at HSI facilities at all times during the test and evaluation effort.

The DHS-S&T-PIA–027 S&T Test Data PIA addresses the test and evaluation activities that will be conducted.

At the conclusion of the testing, if the facial detection and recognition algorithms meet the needs of HSI agents, the algorithms will be included in existing forensic tools and the respective PIAs will be updated to reflect the changes.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td></td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>June 30, 2015</td>
</tr>
<tr>
<td>PTA Expiration Date:</td>
<td>June 30, 2016</td>
</tr>
</tbody>
</table>

DESIGNATION
<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Yes</th>
<th>If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>Other</td>
<td>If “other” is selected, please describe: <strong>Capability Testing using live data.</strong></td>
</tr>
<tr>
<td>Determination:</td>
<td>☐ PTA sufficient at this time.</td>
<td>☐ Privacy compliance documentation determination in progress.</td>
</tr>
<tr>
<td></td>
<td>☐ New information sharing arrangement is required.</td>
<td>☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
</tr>
<tr>
<td></td>
<td>☐ Privacy Act Statement required.</td>
<td>☒ Privacy Impact Assessment (PIA) required.</td>
</tr>
<tr>
<td></td>
<td>☐ System of Records Notice (SORN) required.</td>
<td>☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
</tr>
<tr>
<td></td>
<td>☐ A Records Schedule may be required. Contact your component Records Officer.</td>
<td></td>
</tr>
</tbody>
</table>

**PIA:**
- System covered by existing PIA
- If covered by existing PIA, please list: DHS/ICE/PIA-010(a) - National Child Victim Identification System (NCVIS), July 17, 2012, and DHS-S&T-PIA-027 - S&T TEST DATA, June 24, 2014.

**SORN:**
Choose an item.
If covered by existing SORN, please list: Click here to enter text.

**DHS Privacy Office Comments:**
*Please describe rationale for privacy compliance determination above.*
DHS PRIV concurs with the recommendation that the ICE NCVIS and S&T Test Data PIAs cover the information and test procedures that comprise the evaluation process for this test. PRIV notes that the combined duration for Phases I and II of the test and evaluation is 270 days and that ICE Privacy requires the completion and submission of a Test Questionnaire prior to the commencement of a test employing live data. As such the PTA is approved for 1 year to allow for set-up of the test and destruction of the test data following the conclusion of the test and evaluation.
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.
Homeland Security

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, privacy@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
Version number: 01-2014
Page 4 of 7

(b)(5); (b)(7)(E)
PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>June 27, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>July 8, 2019</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td>Please include recommendation below, including what new privacy compliance documentation is needed.</td>
</tr>
</tbody>
</table>

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>Click here to enter text.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

**DESIGNATION**

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Choose an item. If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>Choose an item. If “other” is selected, please describe: Click here to enter text.</td>
</tr>
<tr>
<td>Determination:</td>
<td>□ PTA sufficient at this time.</td>
</tr>
<tr>
<td></td>
<td>□ Privacy compliance documentation determination in progress.</td>
</tr>
<tr>
<td></td>
<td>□ New information sharing arrangement is required.</td>
</tr>
<tr>
<td></td>
<td>□ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.</td>
</tr>
<tr>
<td></td>
<td>□ Privacy Act Statement required.</td>
</tr>
<tr>
<td></td>
<td>□ Privacy Impact Assessment (PIA) required.</td>
</tr>
<tr>
<td></td>
<td>□ System of Records Notice (SORN) required.</td>
</tr>
<tr>
<td></td>
<td>□ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.</td>
</tr>
<tr>
<td></td>
<td>□ A Records Schedule may be required. Contact your component Records Officer.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PIA:</th>
<th>Choose an item.</th>
</tr>
</thead>
<tbody>
<tr>
<td>If covered by existing PIA, please list:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>SORN:</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>-------</td>
<td>-----------------</td>
</tr>
<tr>
<td></td>
<td>If covered by existing SORN, please list: Click here to enter text.</td>
</tr>
</tbody>
</table>

**DHS Privacy Office Comments:**

*Please describe rationale for privacy compliance determination above.*

Click here to enter text.
Subject: Privacy Threshold Analysis

I hope I am sending this to the correct person. I completed the PTA for a new facial recognition tool from Clearview AI. IN order to utilize this technology for the purpose of child exploitation investigations, and given the national importance of our collaboration, Clearview AI's principals have offered to work with our Agency as follows:

Please let me know if you have any additional questions.

Thanks

Section Chief

Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 203-
This purchase is complete.

Per Richard at Clearview, he will just need the name and email addresses of the users. My understanding is that the product cannot be run on the IRMNET per ITSR waiver.

Also, you will receive an auto-generated email from the EPCTW site requesting that you complete the receipt portion. This step is necessary to finalize the purchase process for auditing purposes.

Have a great weekend,

Intelligence Research Specialist
Homeland Security Investigations
Cyber Crimes Center/Child Exploitation Investigations Unit
(703) 59

-  

Warning: This document is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know," without prior approval of an authorized DHS official. No portion of this report should be furnished to the media, either in written or verbal form.

Sent: Wednesday, June 19, 2019 2:54 PM
To: ice.dhs.gov>; ice.dhs.gov>; ice.dhs.gov>; ice.dhs.gov>
Cc: ice.dhs.gov>; ice.dhs.gov>; ice.dhs.gov>
Subject: FW: Proposed Contract for Clearview AI - Thx

Please see attached. I will confirm the funding piece but I think we are going to be good to move forward.

Unit Chief
HSI Child Exploitation Investigations Unit