

BILLY J. WILLIAMS, OSB #901366  
United States Attorney  
District of Oregon

**ETHAN D. KNIGHT, OSB #992984**

**GEOFFREY A. BARROW**

**CRAIG J. GABRIEL, OSB #012571**

Assistant United States Attorneys

[ethan.knight@usdoj.gov](mailto:ethan.knight@usdoj.gov)

[geoffrey.barrow@usdoj.gov](mailto:geoffrey.barrow@usdoj.gov)

[craig.gabriel@usdoj.gov](mailto:craig.gabriel@usdoj.gov)

1000 SW Third Ave., Suite 600

Portland, OR 97204-2902

Telephone: (503) 727-1000

Attorneys for United States of America

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:16-CR-00051-BR**

**v.**

**AMMON BUNDY, et al.,**

**Defendants.**

**AMENDED DECLARATION OF  
MATTHEW D. HIEMSTRA IN SUPPORT  
OF GOVERNMENT'S RESPONSE TO  
DEFENDANTS' MOTION TO  
REOPEN MOTION TO SUPPRESS  
FACEBOOK EVIDENCE**

I, Matthew D. Hiemstra, declare:

1. I am a Special Agent (hereinafter referred to as "SA") with the Federal Bureau of Investigation (hereinafter referred to as "FBI"), and have been so employed since May 2006. Since August 2016, I have been assigned to the FBI Charlotte Division, Squad CE-11, Violent Crimes Squad. As a Special Agent of the FBI, my duties and responsibilities have included conducting criminal and national security investigations for possible violations of federal law. I

received basic and advanced law enforcement training at the FBI Academy in Quantico, Virginia. During that time, I was taught the use and practical application of various investigative techniques that Federal law enforcement officers are allowed to employ. In addition to my formalized training at the FBI Academy, I have also acquired knowledge and information pertaining to violations of federal law from numerous other sources, including: formal and informal training, other law enforcement officers and investigators, informants, and my participation in other investigations.

2. This declaration is intended to show the handling of Facebook data for 23 accounts by FBI personnel received as a result of a search warrant issued in the District of Oregon on April 8, 2016. The facts set forth in this declaration are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. On May 6, 2016, while I was assigned to the Domestic Terrorism Operations Unit (DTOU) of FBI Headquarters, Portland FBI SA Peter Summers forwarded my unit discs containing Facebook data from the Portland FBI investigation. Upon receiving the discs, the data was uploaded into Palantir Mint. On May 16, 2016, Seattle FBI SA Claudia Bonilla provided me a copy of the search warrant affidavit, attachments A and B, and a list of search terms to be used during processing of the data. On May 19, 2016, Portland FBI SA Peter L. Summers provided me the link for the Facebook data on the Facebook Law Enforcement portal. SA Summers advised that

the data contained on the discs was incomplete but that the information downloaded from the Facebook Law Enforcement portal would have all of the requested data. The data was downloaded from Facebook and then uploaded into Palantir Mint. I was assisted in uploading the data to Palantir Mint by two analysts under my supervision in the unit. Palantir Mint is a software program that organizes social media by Facebook user, sorts the information by date, and allows for the use of key word search terms. In addition, any posting by a Facebook user could be flagged allowing Palantir Mint to create a report solely on the information that was flagged.

DTOU personnel under my supervision processed the data using the supplied search terms and flagged the appropriate postings. Palantir Mint reports, also known as Mint reports, for each user were generated and sent to Portland FBI for review. In generating the reports, the DTOU personnel did not make any judgments as to the content of the information provided in the Mint reports. DTOU personnel solely processed the data through the Palantir Mint program using the date range and key words search. The resulting Mint reports were forwarded to FBI Portland. Following review by Portland FBI, several Mint reports were sent back to DTOU with requests for additional posts to be added, expanded or for some posts to be removed. The requests from FBI Portland personnel consisted mainly of expansion of individual posts in order to determine context of the conversation. The expansion of the conversation was necessary due to the post reported in the Mint report containing one or more of the search terms provided by FBI Portland to DTOU, but without context to understand the conversation.

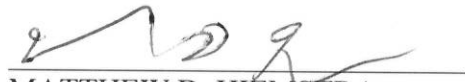
4. The list of search terms is added as an attachment to this communication.
5. On August 8, 2016, a DTOU Intelligence Analyst under my supervision received

an email from the Palantir system operator advising that all of the data from the Portland Facebook warrant had been deleted from the Palantir system.

6. On September 6, 2016, I learned that the five original compact discs sent to DTOU by FBI SA Peter Summers containing the raw Facebook data, are currently in the secured possession of a DTOU intelligence analyst at FBI Headquarters. No copies were made of the compact discs and they were not used after receiving the Facebook download link on May 19, 2016.

7. As of the date of this communication, I also know that all copies of the Facebook raw data have been deleted from FBI Headquarters computer systems.

I declare that the foregoing is true and correct to the best of my knowledge. This declaration was executed in Charlotte, North Carolina, on September 7, 2016.

  
MATTHEW D. HIEMSTRA  
Special Agent, Federal Bureau of Investigation

## **Social Media & Digital Devices Search Terms:**

### **Names/Username:**

dylan.anderson.37454  
banta.jeff  
booda.bear.7  
duane.ehmer  
ken.medenbach  
geoff.stanek  
neil.wampler.3  
sandy.pfeifer.92  
Benghazi  
sean.anderson.1297  
"Joker J"  
jason.blomgren.9  
1115723640  
ryan.bundy.50  
blaine.cooper23  
blaine.cooper.5  
shawna.cox.961  
travis.cox.5688  
100010027395016  
CookieFlorez  
Kemosabe  
david.fry.3950  
wes.kjar  
corey.lequieu  
"Cpt O"  
CptOshaughnessy  
jspsr  
100007711530105  
Scrappy  
scrappyphx.rider  
peter.t.santilli  
profile.php?id=100010120350116

### **Search Terms:**

Kill  
Defend  
Standoff  
Impede  
Deployment  
Checkpoint  
Control



Security  
Resource  
Fed~  
Federal  
Ammon  
Gun~  
Firearm~  
Rifle~  
Weapon~  
Arm~  
BLM  
USFWS  
Bureau  
FBI  
Harney  
County  
Paiute  
Indian~  
Tribe  
Artifact~  
Arrow  
Arrowhead  
Projectile  
Mortar  
Pestle  
Trench  
Reservation  
Human Remains  
Bodies  
Bones  
Burial  
Reburial  
Internment  
Reinternment  
Recapture  
Excavator  
Backhoe  
Dozer  
Repair  
Buford  
Siletz  
1361  
470  
ARPA  
Archeological  
Archeology  
Archeologist  
relic

rock  
archaeology  
archaeologist  
crime  
remains  
injun  
flake~  
obsidian  
Native  
“Boots on the ground”  
BOG  
Broken  
Arrow  
“Call out”  
“Call to Arms”  
“all call”  
“green light”  
Malheur  
Wildlife  
Refuge  
MNWR  
Burns  
Oregon  
“Operation Hammond Ranch”  
Hammond~  
Convoy  
Patriot  
Armed  
Surveillance  
Constitution  
Sacred  
“bunk house”  
bunkhouse  
road  
dig  
construct  
overreach  
ammo  
force  
booda  
bear  
Cliven