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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
CLAUDIA I. BONILLA IN SUPPORT OF
GOVERNMENT'S RESPONSE TO
DEFENDANTS' MOTION TO
REOPEN MOTION TO SUPPRESS
FACEBOOK EVIDENCE**

I, Claudia I. Bonilla, declare:

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter referred to as "FBI"), currently assigned to the Seattle Division, Domestic Terrorism Squad and have been employed by the FBI for approximately six years.

2. As a Special Agent (hereinafter referred to as the "SA"), 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.

3. 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.

4. On May 5, 2016, I took possession of five (5) discs from SA Peter Summers containing data requested in the search warrant. These discs were entered into FBI evidence as 1B1083. I downloaded the discs to my non-networked computer.

5. To comply with the segregation requirement of the warrant, three search teams were created. I organized the Facebook accounts by the defendants assigned to each search team, then made five working copies for each team's use; one copy was sent to the AUSA assigned to the search team, three copies were provided to the FBI personnel on each of the search teams, and one

copy of each search team's data was sent to the DTOU in Virginia. The Ammon Bundy and Bundy Ranch Facebook account information was provided only to the search team led by SA J. Matthew Yeager. The other search teams did not receive the Ammon Bundy or Bundy Ranch account information.

6. On May 13, 2016, I received two (2) additional discs from Facebook, Inc., via FedEx, containing data dated through February 11, 2016 as requested in the search warrant. SA Peter Summers contacted Emily Vascher, Facebook Inc. representative, requesting the information, as it had not been previously received on May 5, 2016. The discs were entered into evidence as item 1B1094. I downloaded the two discs to my non-networked computer, then decrypted the discs per instructions from Facebook Inc. After decryption, I found that some of the file data was in an unreadable format. I did not organize and distribute the data as I had done previously, but was instead instructed to send a copy of the discs to AUSA Barrow on May 13, 2016.

7. On May 19, 2016, SA Summers was contacted by Facebook and informed that due to a system upgrade, the information previously provided in response to the search warrant had been re-issued in a different, more user-friendly format. SA Summers downloaded the reformatted information to an external hard drive on May 20, 2016. The hard drive was submitted to evidence as 1B1107. I did not download or make copies of 1B1107.

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8. The Portland FBI personnel who conducted the reviews of the Mint reports and the date on which the review was conducted are listed below:

account holder	review date	Primary reviewer
1. Ammon Bundy acct	06/21/2016	SA J. Matthew Yeager
Bundy Ranch video review	06/21/2016	SA Claudia Bonilla
2. Darryl Thorn	05/26/2016	SA J. Matthew Yeager
3. Travis Cox	06/03/2016	SA J. Matthew Yeager
4. Geoffrey Stanek	06/01/2016	TFO Jeremy Chedester (WCSO)
5. Jon Ritzheimer	05/26/2016	SA Peter Summers
6. Ryan Bundy	06/01/2016	SA Adam Krametbauer
7. Joseph O'Shaughnessy	05/26/2016	SA Peter Summers
8. Corey Lequieu	06/08/2016	SA Kevin Strauss
9. David Fry	06/03/2016	SA J. Matthew Yeager
10. Bundy Ranch	06/21/2016	SA J. Matthew Yeager
Bundy Ranch addendum	06/21/2016	SA J. Matthew Yeager
11. and 12. Blaine Cooper	05/31/2016	SA Kevin Strauss
13. Jason Patrick	05/26/2016	SA J. Matthew Yeager
14. Shawna Cox	06/01/2016	SA Wade Mutchler
15. Wesley Kjar	06/10/2016	SA Kevin Strauss
16. Guerilla Media (Santilli)	05/17/2016	SA J. Matthew Yeager
17. Sandra Anderson	06/09/2016	SA Kevin Strauss
18. Pete Santilli	05/17/2016	SA J. Matthew Yeager
19. Eric Flores	06/02/2016	TFO Daniel Diamond (OSP)
20. Duane Ehmer (nothing in acct)	06/15/2016	SA Peter Summers
21. Sean Anderson	06/01/2016	SA Wade Mutchler
22. Ryan Payne	06/01/2016	SA Adam Krametbauer
23. Jason Blomgren	06/13/2016	SA Kevin Strauss

9. The data on my non-networked computer was password protected and inaccessible to anyone but me. I know that the hard drive on my non-networked computer was erased on or about August 23, 2016. As of the date of this declaration, it is my understanding all copies of the

raw Facebook data that were in my possession have been destroyed or entered into evidence and sealed.

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

s/ Claudia I. Bonilla

CLAUDIA I. BONILLA

Special Agent, Federal Bureau of Investigation

