### **Evidence of Criminal Misconduct by FBI Special Agent Elliot McGinnis**

May 25, 2025

We, the undersigned, have uncovered extensive proof of criminal misconduct in the March 27, 2018 search of 8 Hale Drive in *United States v. Keith Raniere*. The evidence directly implicates multiple agents and demonstrates that **Special Agent (SA) Elliot McGinnis** played a central role in orchestrating this wrongdoing.

With our combined 43 years with the FBI, we have never encountered a search conducted with this magnitude of deliberate malfeasance. In this case, the proof comes directly from the FBI's own records, including the search logs and photographs.

Please find enclosed:

- Our two-page summary declaration of key findings and their significance
- A question-by-question guide for exposing SA McGinnis' misconduct in any proceeding where SA McGinnis is subject to questioning

It is our hope that this material supports appropriate oversight, legal accountability, or investigative follow-up. We stand ready to assist with any further analysis, testimony, or expert support as needed.

Sincerely,

DocuSigned by:

kenneth Denardo

Kenneth DeNardo

Former Senior FBI Evidence Technician & Evidence Response Team Photographer 23 years of experience in the FBI

DocuSigned by:

Mark Bowling

**Mark Daniel Bowling** 

Retired FBI & OIG Assistant Special Agent In Charge 20 years of experience in the FBI

#### Declaration on Evidence of Criminal Misconduct in FBI Search in U.S. v. Raniere

In *United States v. Keith Raniere et. al.*, the government executed a fraudulent, staged search in which agents forged records, planted evidence, and constructed incriminating scenes using props of unknown origin. With our combined 43 years with the FBI, we have never encountered a search conducted with this magnitude of deliberate malfeasance.

The malfeasance is proven by the FBI's own search records. These findings are documented in a report authored by former FBI Senior Evidence Technician Kenneth DeNardo and corroborated by retired FBI Special Agent and OIG Agent Mark Daniel Bowling. (*See* DeNardo Report, *US v. Raniere*, E.D.N.Y., 18-cr-204, Docs. 1273-1, 1273-2, 1273-3). Key findings are as follows:

- Search Logs Pre-Filled and Forged: Before the search team even arrived on site, evidence log entries meant to be completed in real-time were pre-filled in advance, scripting "discovery" by predetermining both the order and location of key items to be collected, before the search began. Then, entries were later crossed out and the order of discovery altered to create a more incriminating narrative. Special Agent (SA) Elliot McGinnis was a key orchestrator of this fabrication. (DeNardo Report, Findings 1, 2).
- Falsified Evidence Log Entries: SA McGinnis also falsified log entries for multiple agents. For example, he filled in the "Observed by" column on the evidence log as if he were SA Christopher Mills for 32 of 40 item entries a staggering 80% of the entries. (DeNardo Report, Finding 3).
- Manufactured Scenes with Planted Items: Areas in the search were falsely staged and incriminating items of unknown origin were planted in scenes and photographed. These highly prejudicial items were directly relevant to the search warrant, yet they were not taken as evidence.
  - Ouncollected, Second Camera: For example, the search warrant sought photographic evidence. Two cameras were present one of which would later become a centerpiece of the government's case. Only that one was taken. The second was planted on a countertop, labeled as evidence, photographed, and shown to the jury as evidence as if it had been collected, but was intentionally left behind. (DeNardo Report, Finding 7).
  - o **Two, Uncollected, Planted Sex Trafficking Books:** Even more striking, two books on sex trafficking¹ − the central alleged crime tied to this search − were planted on a desk, photographed, and later used as props in manufactured scenes on a nearby bookshelf. Yet they too were not taken into evidence, despite appearing, on their face, highly relevant to the warrant − a fact that strongly suggests they were brought to the scene solely to create prejudicial photographs. By contrast, a less relevant yet inflammatory book on "The History of Torture" − pre-scripted in a pre-filled evidence log entry to be the third item "discovered" − *was* collected. (DeNardo Report, Finding 6).

-

<sup>&</sup>lt;sup>1</sup> The books photographed are similar in subject matter to materials used in FBI in-service training.

- Mishandling of the Only Two Items Used at Trial: The camera and a Western Digital hard drive were the only two items from the search used to convict the defendant. Both were grossly mishandled in the search. Notably, SA McGinnis was the seizing agent, taking initial custody of these two items, as indicated by their chain of custody logs. (Defense Exhibits 945 and 960).
  - The Camera: The camera was allegedly in a camera bag, which was photographed in place, then placed on a desk partially open, yet never shown with visible, identifiable contents. (DeNardo Report, Finding 8).
  - o **The Western Digital Hard Drive:** The Western Digital hard drive's handling was even more egregious. A *different* drive − a LaCie − was mislabeled as Item #2 and photographed. Meanwhile, the actual Western Digital drive was collected and logged as Item #2. (DeNardo Report, Finding 9). The mislabeled LaCie drive later had its #2 label removed and was relabeled as Item #37 and photographed a second time − this time in one of the manufactured scenes containing the planted sex trafficking books. (DeNardo Report, Finding 6).
- Seven Experts Confirm Digital Falsification and Planting: Seven post-conviction digital forensic experts including four former FBI examiners, among them the undersigned Mr. Bowling determined that the so-called contraband was planted on the hard drive, corroborating photo files were planted on the camera's memory card, and timestamps were manipulated, falsely making photos appear as if they were taken in 2005, thereby falsely depicting a 15-year-old. (Doc. 1253-1). An independent expert retained by Newsweek agreed with the seven defense experts.<sup>2</sup>

We declare under penalty of perjury, pursuant to 28 U.S.C. 1746, that the foregoing is true and correct.

—DocuSigned by:

kenneth Denardo

Kenneth DeNardo

Former FBI Senior Evidence Technician and ERT Photographer

Executed on: 5/13/2025

DocuSigned by:

Mark Bowling

Mark Daniel Bowling, CISSP

Retired FBI & OIG Assistant Special Agent in Charge

Executed on: 5/13/2025

<sup>&</sup>lt;sup>2</sup> See https://www.newsweek.com/fbi-nxivm-crime-sex-cult-keith-raniere-2004375

# **Prepared Line of Questioning & Exhibits**

To Impeach, Investigate, or Prosecute FBI Special Agent Elliot McGinnis for His Role in Evidence Fabrication in *U.S. v. Keith Raniere* 

Date: May 25, 2025

By:

#### Kenneth DeNardo

Former Senior FBI Evidence Technician and Evidence Response Team (ERT) Photographer 23 years of experience in the FBI

#### **Mark Daniel Bowling**

Retired FBI & OIG Assistant Special Agent In Charge 20 years of experience in the FBI

#### INTRODUCTION

We, the authors, uncovered extensive proof of criminal conduct<sup>1</sup> by FBI Special Agent Elliot McGinnis and others during and surrounding the March 27, 2018 search of 8 Hale Drive, Halfmoon, NY, in the case of *United States v. Keith Raniere*.

With our combined 43 years in the FBI, we have never encountered a search conducted with this magnitude of deliberate malfeasance and corruption. The proof comes directly from the FBI's own records — including search logs and photographs.<sup>2</sup>

These records reveal conclusive evidence that the 8 Hale search was premeditatedly and falsely staged to construct a prejudicial and incriminating narrative. This included:

- Planting incriminating items including sex trafficking books in staged, manufactured scenes at a key location the government claimed was used to commit alleged sex trafficking.
- Falsifying evidence log entries SA McGinnis filled out official records under others' names for over 80% of the items, corrupting the start of their chain of custody.
- **Prefabricating search records** SA McGinnis completed log entries for key evidence items before agents even arrived at the site. These entries included exact item locations and a discovery sequence, revealing a staged, pre-scripted search.

The evidence shows SA McGinnis played a central role in this fraudulent operation.

<sup>&</sup>lt;sup>1</sup> Please refer to our joint declaration, dated May 13, 2025, for a high-level summary of the evidence of criminal conduct by SA McGinnis's, available at <a href="https://www.usvraniere.com/r/mcginnis/joint-declaration.pdf">https://www.usvraniere.com/r/mcginnis/joint-declaration.pdf</a>.

<sup>&</sup>lt;sup>2</sup> These records can be downloaded from <a href="https://www.usvraniere.com/r/mcginnis/questioning-exhibits.pdf">https://www.usvraniere.com/r/mcginnis/questioning-exhibits.pdf</a>.

This guide is for anyone tasked with questioning or investigating SA McGinnis. It walks step-by-step through a complete line of questioning — using only the FBI's own records and visual reconstructions based upon them. Ultimately, McGinnis will face three options: admit wrongdoing, lie under oath, or invoke the Fifth Amendment.

We stand ready to assist with follow-up, including strategy, briefing, or expert support.

#### **GUIDED QUESTIONING**

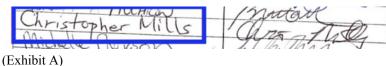
#### Section 1: SA McGinnis' Role in Falsifying FBI Evidence Log Entries

- 1. You're currently an FBI Special Agent and have participated in numerous searches is that right?
- 2. As an agent, you're familiar with standard FBI evidence collection procedures, including how the evidence log is used yes?
- 3. That log is required by FBI procedure to be filled out in real time as items are found, and it records details like item number, description, room, who collected it, and who observed it right?
- 4. Each agent is required to fill in their own name under "Collected By" or "Observed By," in their own handwriting correct?
- 5. Is this to create accountability, as it confirms who handled the evidence, who can be questioned about it later, and it initiates the official chain of custody?
- 6. So if the evidence log entries are inaccurate or falsely attributed, does that undermine the integrity of the search and calls into question the integrity and admissibility of the evidence?
- 7. Did you participate in the search of 8 Hale Drive in *United States v. Raniere*?
- 8. This is the FBI sign-in sheet for that search. Your name and signature appear here is that your own handwriting?

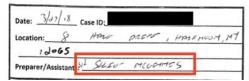


(Exhibit A, FBI Sign-In Sheet for the 8 Hale Search.)

9. And Agent Mills' name and signature are there and in different handwriting — correct?



10. Here's the top of the evidence log from that search. Your name appears next to "Preparer/Assistant," in your handwriting — is that right?



(Exhibit B, FBI Evidence Recovery Log from the 8 Hale Search)

- 11. So you were the person responsible for writing in the evidence log during the search?
- 12. And as the logging agent, you were responsible for ensuring that no false or misleading entries were made into the evidence log right?
- 13. Now looking at the entry for Item 1 it lists Agent Mills as the observing agent, and the handwriting appears to match his entry on the sign-in sheet correct?

Item#	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Collected by/ Observed by (First Name <u>and</u> Last Name)	Ī
1	(AMMON VITASONEC (ANDRA SIM 1420908348 N ALCOSONOC	F.	vuon oust	Rocar Halland	T,

(Exhibit B, Pg. 1)

14. But for the next entries — Items 2 through 9 — Mills' name appears repeatedly, but the handwriting is yours, not his?

Item#	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Collected by/ Observed by (First Name <u>and</u> Last Name)	P
/	ANYMON VITASONEC (ANDES SM 1420908348 / ALCOSINO	Writter	by Mills	Christopher Mill	15
2	S/H WCA\$ \$1365334 Writ	ten by I	McGinnis -	CHRISTOPHUR MEUS	1
3	BOOK HESTORY OF TORTURO	٤	DIO SHOW	TIM LOLL	ß.
4	(A) MINI OV CASSOTTS  (A) SUNT OV CAM	A	CUMTORTOR		D
×	Sort CHBOR (SHOT	A	· for	~	
6	AMMZON KEHOLE SH BOUL 18219372086	E	CHTOP OF HOT TUB	S MICONAIS  CHRESTORIA MILLS	ß-
7	MEMORET CO-R DESC	E	of the of Hotels		ي م
e	46B 705H2BD HW MOOREN	E	ON TUP OF HUT TUS		00
9	NOW (CO)	6	on the or called	CHRESTORINA MENS	9

(Exhibit B, Pg. 1)

15. In fact, you wrote Agent Mills' name into the log as the collecting or observing agent for at least 32 of the 40 items documented in that search — correct?

(See Exhibit B, Entries for Items 2-4, 6-13, 15-18, 20-23, 25, 27-29, 33-34, 36-37, 38-40.)

- 16. In several of those entries, you are listed as the collecting agent and Agent Mills' is listed as the observer but both names are in your handwriting—meaning you filled in both names on the record that initiates the chain of custody—right?
- 17. FBI procedure requires each agent to write in their own name to ensure accountability and independent verification and your entries fail to meet that standard doesn't it?

# Section 2: SA McGinnis' Connection to Planted Evidence and Manufactured Evidence Scenes

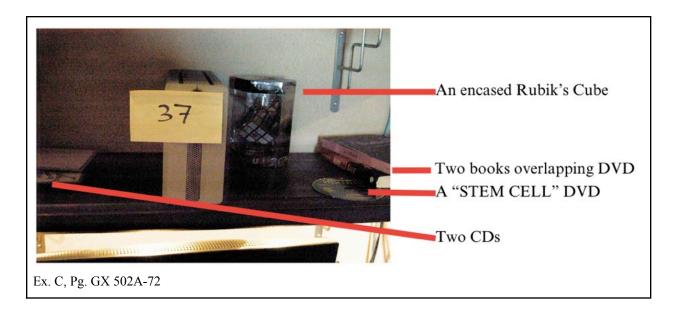
- 18. You logged Items 36 and 37 in the evidence log correct? (See Exhibit B, Pg. 5)
- 19. And for both, you wrote in SA Mills' name as the observing agent not Mills himself in violation of FBI procedure right?
- 20. Now let's turn to the photographs. Do the photos of Items 36 and 37 show they were photographed on the same bookshelf, with an identical background: the Rubik's cube, two CDs, and two books?



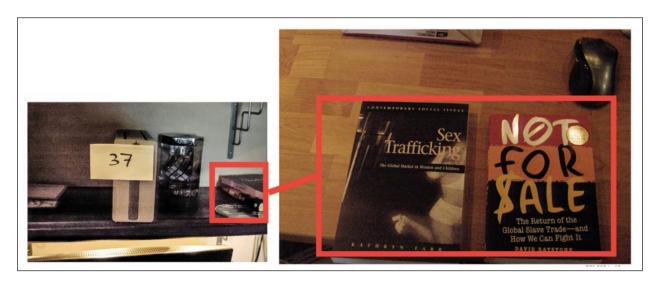
Exhibit C., FBI Photos from the 8 Hale Search, Pg. GX 502A-71



Ex. C, Pg. GX 502A-72

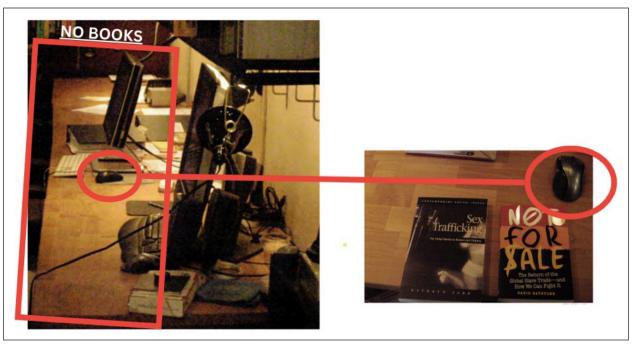


21. Zooming in, the books are about sex trafficking — the central focus of both the search warrant and the case — correct?



(Ex C,, Pg. GX 502A-72, GX 502A-55)

- 22. Despite their relevance to the warrant, these two books on sex trafficking were never stickered, logged, or collected as evidence?
- 23. They were first photographed on the desk in the upstairs study, but do not appear in the initial entry photo of that desk is that right?



(Ex. C, Pg. GX 502A-24, GX 502A-65)

- 24. So the books appear suddenly on this desk—with no known or documented origin?
- 25. So the FBI didn't preserve the sex trafficking books as actual evidence but used a staged photo of them as evidence?
- 26. Meanwhile, a far less relevant book "The History of Torture" was logged, stickered, and collected as Item 3?



(Ex. C, Pg. GX 502A-35)

- 27. This is not a forbidden text. In fact, it's publicly available on Amazon.com<sup>3</sup>?
- 28. Yet upwards of hundreds of books in that study, "The History of Torture" was the only book photographed and labeled as evidence?

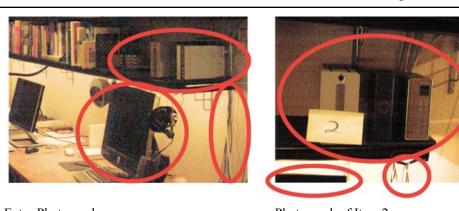
<sup>&</sup>lt;sup>3</sup> See https://www.amazon.com/History-Torture-Execution-Civilization-Medieval/dp/1585746223

#### Hundreds of Books Present at the Search Site





- 29. The sex trafficking books which were never collected first appeared on the desk from an unknown origin, and later appeared again on the bookshelf behind Items 36 and 37, serving as props in those evidence photos is that right?
- 30. Comparing the photo of Item 2 to those of Items 36 and 37, it's the same shelf, same brackets, same wires the same location reused to stage different scenes correct?



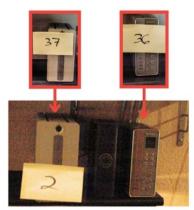
Entry Photograph Ex. C, Pg. GX 502A-26

Photograph of Item 2 Ex. C, Pg. GX 502A-34



Ex. C, Pg. GX 502A-34, 72

31. Do the devices shown in the photos for Items 36 and 37 appear to be the same devices that appear in the earlier photo of Item 2?



Ex C., Pg. GX 502A-34

32. The photos, as shown through a forensic reconstruction, demonstrate that the devices were removed, re-added back, with props of unknown origin meticulously arranged to create an artificial setting – including repositioning the devices and adding the sex trafficking books, CDs, and Rubik's cube — is that right?

#### Forensic Reconstruction of Scene Fabrication Regarding Items 36 and 37

Disclaimer: Some images are reconstructions and indicated by "This photo is a reconstructed scene."



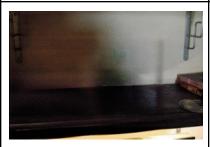
1) Item 2 photographed Ex. C, Pg. GX 502A-34



2) Devices removed. (Reconstructed scene)



3) Caseless DVD added. (Reconstructed scene)



4) Two sex trafficking books positioned atop the DVD. (Reconstructed scene))



5) Encased Rubik's Cube placed on the shelf. (Reconstructed scene)



Step 6. Two CDs placed on the shelf, slightly offset.
(Reconstructed scene)



7) Sony DVD drive added, photographed as Item 36. Ex. C, Pg. GX 502-A71



8) Sony DVD drive removed and collected.
(Reconstructed scene)



9) LaCie drive added back, photographed as Item 37. Ex. C, Pg. GX 502A-72



10) LaCie drive collected, leaving the space empty. (Reconstructed scene)

(This cell is intentionally left blank)

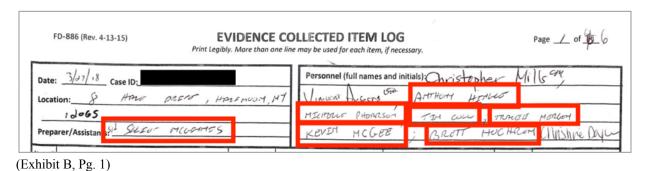
(This cell is intentionally left blank)

- 33. Is this documenting a search or creating false scenes and false evidence photos?
- 34. Is there any operational justification for manufacturing a scene with planted items of unknown origin staging and photographing it as evidence?
- 35. You logged Items 36 and 37 with Mills' name. Were you also involved in fabricating the scenes in which those items were depicted?
- 36. Do you know who directed or executed the planting of the sex trafficking books used in those staged photographs?

# Section 3: SA McGinnis' Role in Orchestrating a False, Staged Search Operation and Creating False Search Records

#### Personnel Log Was Improperly Pre-Filled Before Arriving at the Search Site

- 37. Per FBI procedure, each agent is required to write and initial their own name in the personnel list on the evidence recovery log, to verify their presence right?
- 38. Yet the personnel list at the top of the evidence log contains six agent names written in your handwriting, in violation of FBI procedure?



39. You signed into the 8 Hale search site at 7:45am, 45 minutes after the search began at 7:00am and everyone else was already there— is that right?

(See Exhibit A)

- 40. This means you wrote in names for others who were already present and could have done so themselves?
- 41. One of those names was SA Kevin McGee, who was not even present at the search—yes?
- 42. Your team leader, Christine Doyle, signed last, on the same line as McGee correct?

Personnel (	full names and in	itials): Ohris	topher M	11594
VINCENT	ALGERS 1500	AMTHOM	HEALLS	
MICHOLLE	PHOARSOM	124 W		MERGON
KEVIM	MCGEE	; BROT	T HUCHRO	M Christine Day

(Exhibit B, Pg. 1)

- 43. So either you falsely recorded McGee's presence and Doyle didn't notice, or the personnel list was completed before either of you arrived at the site which was it?
- 44. That personnel list is located only on Page 1 of the evidence log, right?

# <u>Log Entries Were Pre-Filled and Pre-Scripted Before the Search Began</u>

- 45. Page 1 of the evidence log is supposed to reflect the order in which the listed items were found during the search is that so?
- 46. Let's look at Item 1: a Canon camera, logged as found in Room F?

			(e.g., Specific area w/in room)	(First Name <u>and</u> Last Name)	
1	SM 1420908348 / ALCOSSACE	F.	VHOM OUSE	Brett Halles	5-2
/	ELECTION DILETAL		A Bund CHURS	3	4 0

(Exhibit B, Pg. 1)

# Search Photos of Item 1, Listed as the Canon Camera



Ex C., Pg. GX 502A-32



Ex. C, Pg. GX 502A-33

47. Item 3 is The History of Torture book, logged as found on a DVD shelf in Room E?

-				CHRISTOPHUR MILLS	
13	(1) BOOK HASTORY OF TORTURE	٤	DID SHORE	Tim Coll	BOY 4
	(20 ( 00) O. ( 100 TTO)			1	

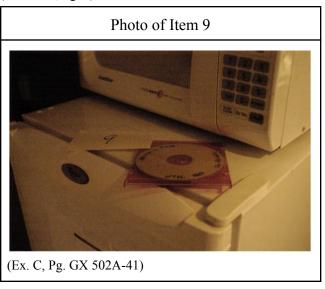
(Exhibit B, Pg. 1)

# Photo of Item 3 [Ex. C, Pg. GX 502A-35]

48. Item 9 is a CD labeled "Heaven in Exile," listed as found on top of a fridge in Room G?

(20) (0)			CHRSTOPHON MILLS	
G NOW EN EXELLY	6	ON THE OF CARDY	S. MIOTHARS CHRISTOPHEN MRUS	200

(Exhibit B, Pg. 1)



- 49. The evidence log lists Item 9 as being collected by you, is that right?
- 50. Page 1 logs Items 1 through 9. Page 2 continues Items 10 through 19?
- 51. So Page 3 should begin with Item 20, right?
- 52. But instead, Page 3 starts with a crossed-out *Item 1*, a CD titled "Heaven in Exile", followed by Item 20, and then a crossed-out Item 3, the Torture book correct?

#### Page 3 of the Log

Item#	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Collected by/ Observed by (First Name <u>and</u> Last Name)	Packaging Method
1	HEAVAN EN ERECA	X	TOP OF FREDUR		/
20	5 CASE PACCORNES	6	OH PROHIM	BRETT HOHRON	our/
3	AND HERVICH OF TOTAL	×	And week	-	/
11	5/4 B831V2 7000562		UNDOR DUSK	BRETT HOURS	01/

(Exhibit B, Pg. 3)

53. That same book had been logged by you as the same item number 3 on page 1 and that same CD had been logged by you as *Item 9* on Page 1 and collected by you — yes?

Page 1 of the Log

1	3/11 - 0.001 301 311	177	Y	CHRISTOPHUM MEUS	
3	(1) BOOK HESTERS OF TORTURE	3	DIO SHOW	Tim Coll	BOY 4
4	(1) SUNT ON CAM	A	OH CUNTOR TOP	Anthony House	5
×	SONT CHOOL (SHOT)	A	- And	-	-
6	AMPTON KENOLE SM BOUY 18319333086	É	CHTOP OF HUT TUB	E MICOURES  CHRESTORIAL MINIS	3
7	MEMERET CO-R OFSC	E	ON THE OF HOTENS	S. MCCOURS  CHASS TO DAVA MEMS	3
R	46B TOSHEBA THUMBOREW	E	ON TOP OF HUT TUS	S. HELDANG MEUNS	orts
9	10x (ED) (1) KUT	6	on the or energy	E. MICENAES CHRESTOPHER MENT	200

(Exhibit B, Pg. 1)

- 54. After that, the log continues with Item 21 and onward, in proper sequence right?
- 55. So on Page 3, two previously used item numbers Items 1 and 3 appear fully written out, crossed out, and placed between Items 20 and 21?
- 56. If this log were being completed in real time, Page 3 would have begun with Item 20 and not with a repeated entry for Item 1 yes?
- 57. So the illogical sequence on Page 3 shows that before the search, you pre-filled Item 1 as the CD *Heaven in Exile*, skipped a row for Item 2, and pre-filled Item 3 as *The History of Torture* then crossed them out and later reused the page as Page 3 to log Items 20 and onward is that correct?

#### Forensic Reconstruction, Illustrating the Pre-Filling of Entries

**Disclaimer:** Some of the images below are forensic recreations, based on the FBI's evidence logs, meant to illustrate intermediate stages, leading to how the entries on page 3 came to be.

## 1) Pre-Filled Entries Are Made on Page Orginally Intended to Be Page 1

Item#						
Kelli .	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Collected by/ Observed by (First Name <u>and</u> Last Name)	Packaging Method	Comments (if needed)
l	HEDNAH ZH EKZCA	G	top or raidors			
			~			
3	BOOK THO HESTORY OF HOTHER	٤	AO SUCLA			

(This is a forensic reconstruction – **not** an original log page.)

**Step 2: Pre-Filled Entries Are Crossed Out** 

Item#	7.5					
	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Observed by	Packaging Method	Comments (if needed)
*	HERVAN SH ERRING	X	102 06 GR 1000		/	
3	Alo HESTORY ST TOTAL	X	Too super	-	/	

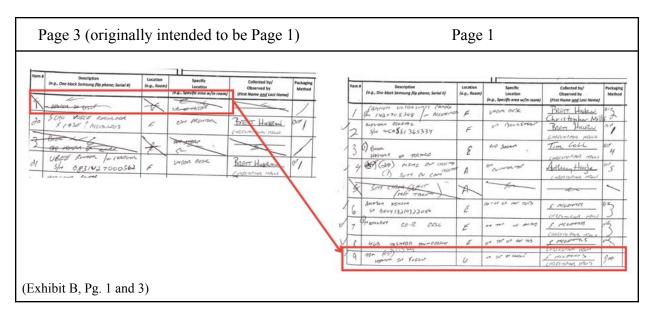
(This is a forensic reconstruction – **not** an original log page)

# 3) Page with Crossed-Out Entries Reused as Pg. 3 to Log Item 20 Onwards

Item#	Description (e.g., One black Samsung flip phone; Serial #)	Location (e.g., Room)	Specific Location (e.g., Specific area w/in room)	Collected by/ Observed by (First Name <u>and</u> Last Name)	Packaging Method	Comments (if needed
T	HEDRAM EN ELECT	X	102 OF FRICIO		/	
20	SCHO VOSES RUCORDON	-	OH PROITIN	BRETT HOHRON	001	
3	Allo resource for normal	×	The street	-	/	
1/	S/H B831V2 7000562	F	UHDOR DUSK	BRETT HOHRON	01/	
	MOTCOM RELTOR			BOCT HOUSE	lot.	

58. And under FBI procedure, since evidence logs must be filled out in real time as items are discovered, pre-filling entries and an exact sequence of discovery like this violates protocol and creates a false and misleading record — is that right?

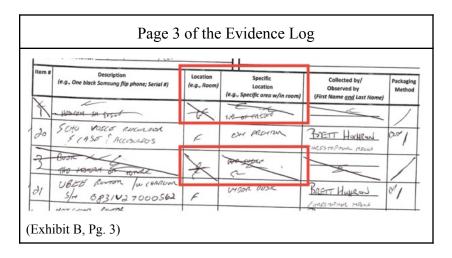
59. In the revised sequence, the CD was demoted to Item 9, while the book remained as Item 3, respectively, on the final Page 1 — yes?



- 60. And the new Item 1 became the Canon camera?
- 61. Item numbers reflect the actual order in which items are found in the search correct?
- 62. Is there any legitimate reason under FBI procedure to designate something Item 1 and later demote it to Item 9?
- 63. The only reason to renumber an item like that would be to reshape the narrative, emphasizing different evidence items correct?

#### Advance Knowledge of Evidence Locations and Pre-Scripting Before Arrival

- 64. Since we've established that the personnel list on Page 1 was filled out before you arrived and Page 1 only became Page 1 after discarding the entries now on Page 3 that means the entries on Page 3 were also pre-filled before you even arrived at the site?
- 65. When you arrived at the search, the property was locked, per team leader Christine Doyle's worksheet correct?
- 66. Yet you had already written that a CD would be found in Room G, and a book titled The History of Torture would be found on a DVD shelf in Room E?
- 67. Room labels like E, F, and G are assigned during the search, not before right?
- 68. But, in the pre-filled entries, you pre-assigned these room labels and surface locations before even arriving at the property?



- 69. That creates the false appearance that the entries were made during the search when in fact, they were pre-scripted correct?
- 70. Did you, Special Agent Mills, or any other member of the search team know in advance what items would be "discovered" and where?
- 71. (If yes) How did they know this?

#### **Oversight**

- 72. Who supervised the task force conducting this search?
- 73. Was that your immediate supervisor?
- 74. Was your supervisor aware that you and others had pre-scripted, staged, and falsified key elements and foundational records of this search?

#### **CONCLUSION**

The evidence in this guide shows that SA McGinnis was a key orchestrator of this fraudulent search operation, which entailed planting incriminating items, staging fabricated scenes, and falsifying official FBI records. The scale of the documented wrongdoing here is unlike any search operation we have seen — a coordinated fabrication of evidence at multiple levels, involving multiple agents — and it demands immediate investigation and accountability.