

FABRICATION AND PLANTING IN FBI SEARCH IN *US V. RANIERE*

Based on the FBI's own photos and logs, Kenneth DeNardo, a former FBI Senior Evidence Technician and ERT Photographer ([see DeNardo Report](#)), and retired FBI and OIG Special Agent Mark Daniel Bowling ([see declaration](#)) uncovered and verified clear proof of planting, staging, and fabrication, including:

- The FBI created scenes and planted evidence—just like President Trump says happened at Mar-a-Lago. The FBI's own photos indisputably prove this. This is detailed in the next section. (See also DeNardo Report, Finding 6)
- One agent, Special Agent Elliot McGinnis, fraudulently signed as a different agent for 32 out of 40 item entries, raising questions about the authenticity of the entire search process. (See DeNardo Report, Finding 3)
- A canine present at the site was not logged into the Crime Scene Sign-In Log (See DeNardo Report, Finding 4)
- One agent (Kevin McGee) was listed as search personnel but was not actually present, while another agent (Timothy Loten) spent over 3 hours at the scene but was absent from the official personnel list and administrative worksheet that designate roles in the search. ([see the FBI logs in DeNardo's Report Exhibits](#))
- An uncollected second camera was planted and staged to falsify the scene. (See DeNardo Finding 7)

The search malfeasance occurred weeks before any indictment. This raises the question: *Why would agents in the district's most high-profile case at the time risk such extensive fabrication if they had a legitimate case?* These findings reveal bad faith and fraudulent intent from the start.

1. Step-by-Step Walk-Through of Scene Fabrication in the FBI Search

A clear and damning example of scene fabrication occurred on the upstairs bookshelf, where the alleged CP hard drive was supposedly found. This was not a case of items being moved for clarity or unintentionally rearranged. This was a deliberate act: agents brought new objects onto the scene, meticulously arranged them to craft a false narrative, and knowingly used this artificial setup to document fabricated evidence photos. This can be independently verified by viewing the FBI search photos, included [in DeNardo's Report Exhibits](#).

a. Indisputable Evidence from the FBI's Own Photos

1. At the start of the search, an initial photo of the upstairs bookshelf (Photo of Item 2) shows three devices.

Figure 6.¹ Bookshelf in Study First Shows 3 Devices - See Reference Points



Entry Photograph
Exhibit E, Search Photos, Pg. GX 502A-26



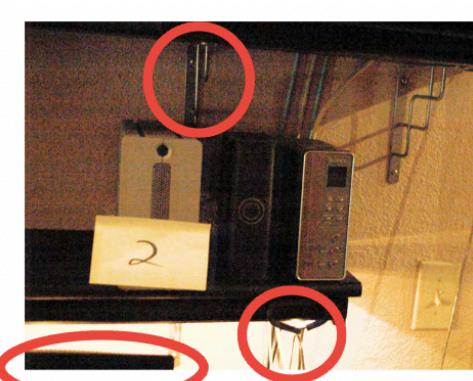
Photograph of Item 2
Ex. E, Pg. GX 502A-34

2. Later, the same spot on the bookshelf is photographed for Item 37. While the reference points—like wall brackets and wires—confirm it's the same location, the background has completely changed.

Figure 7. Item 37: Same Device, Same Part of Bookshelf - See Reference Points



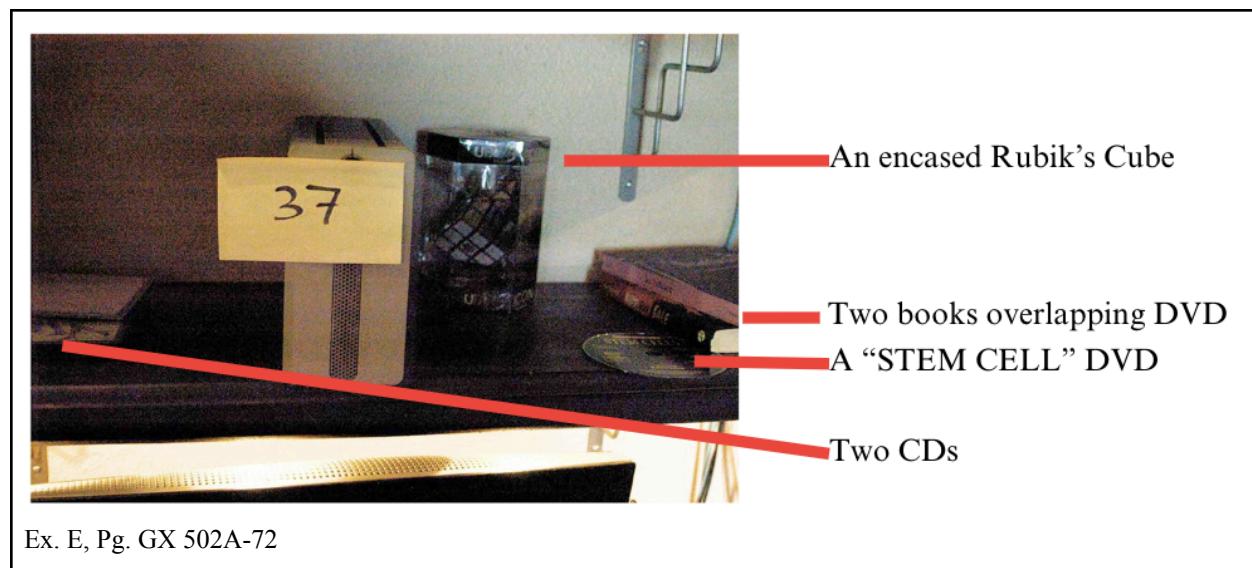
Ex. E, Pg. GX502A-34, 72



3. New objects, including a DVD, two books, a Rubik's Cube, and two CD cases, were added and meticulously arranged to create a false scene.

Figure 8. Several Items Added to the Scene on the Bookshelf

¹ The figure numbers referenced in this document are taken directly from the DeNardo Report. These figures correspond to those in the original report and can be cross-referenced for additional details.



4. This fabricated scene was used twice in consecutive photographs of Items 36 and 37. Notably, these are the same devices originally seen in the photo of Item 2, now reintroduced into the fabricated setup.

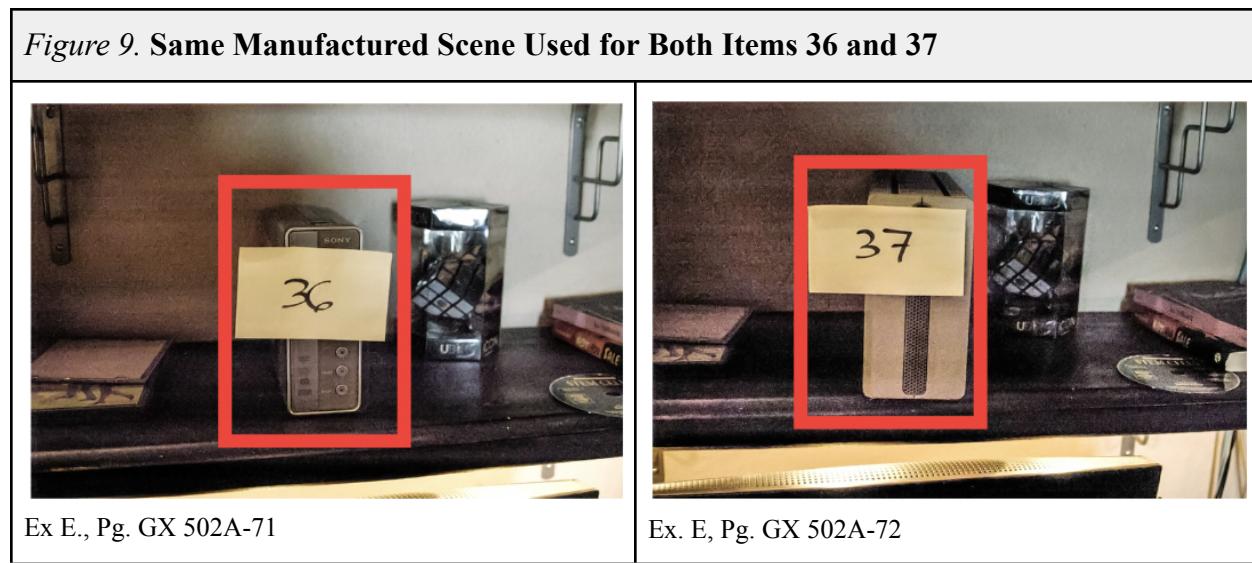
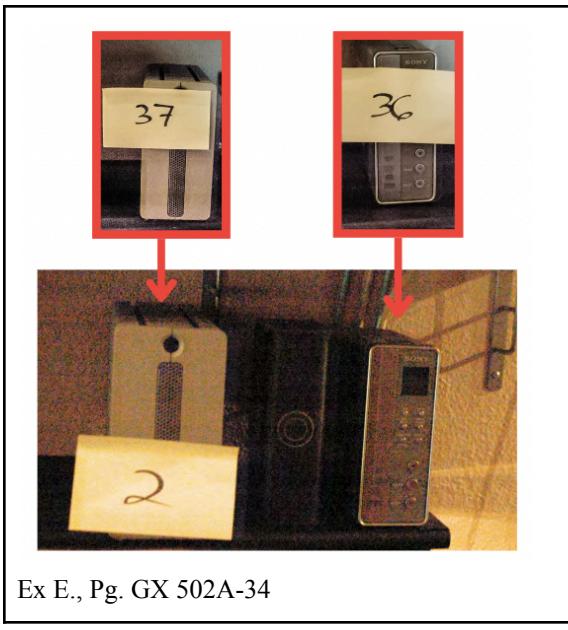


Figure 10. Items 36 and 37 Are Two of Three Devices from First Scene on Same Part of Bookshelf



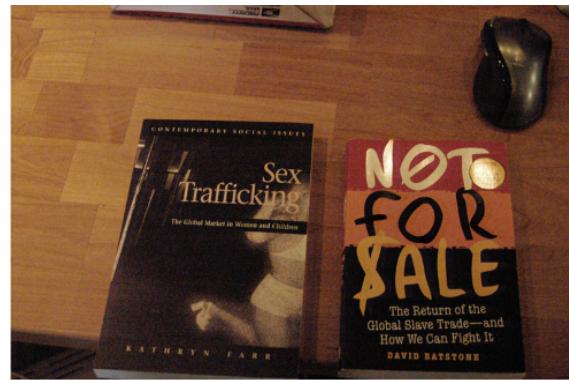
Ex E., Pg. GX 502A-34

5. None of the added props—books, DVDs, Rubik’s Cube—were photographed “in place,” as required by FBI protocol, or collected as evidence. As such, their origin is unknown.
6. Two books happen to be about sex trafficking, the central alleged crime tied to the search and were left uncollected despite being highly relevant to the alleged crimes. In stark contrast, an unrelated book on the history of torture was prioritized, tagged, and collected as Item 3.

Figure 12. The Two Added Books Are About Sex Trafficking



Close-Up of the Two Book Added to the Shelf
Ex E., Pg. GX 502A-72



Clear Photograph of the Same 2 Books, on the Desk
Ex. E, Pg. GX 502A-65

b. Forensic Reconstruction

The forensic reconstruction by Mr. DeNardo illustrates the deliberate steps agents took to fabricate the false scene, by using the FBI evidence photos of Items 2, 36, and 37 as baselines.

Reconstructed photos of the intermediate steps are explicitly noted. The actions of Special Agents Christopher Mills (who testified at trial), Tracee Mergen, and Task Force Officer Brett Hochron directly implicate them in this manipulation.

Figure 11. [Scene Fabrication] Reenactment Sequence		
 <p>Step 1. SA Mills photographed the bookshelf, showing 3 devices. Ex. E, Pg. GX 502A-34</p>	 <p>Step 2. Some time later, an agent clears off the bookshelf. <i>This photo is a reconstructed scene.</i></p>	 <p>Step 4. An agent places a caseless DVD titled “STEM CELL” on the shelf. <i>This photo is a reconstructed scene.</i></p>
 <p>Step 5. An agent positions the two books on top of the DVD, slightly offset. <i>This photo is a reconstructed scene.</i></p>	 <p>Step 6. An agent places an encased Rubik’s Cube of unknown origin on the shelf. <i>This photo is a reconstructed scene</i></p>	 <p>Step 7. An agent places 2 CDs of unknown origin on the shelf, slightly offset from each other. <i>This photo is a reconstructed scene.</i></p>
 <p>Step 8. An agent places the Sony DVD drive back on the bookshelf. SA Mills photographs it (Photo #71) and SA Mergen logs the shot in the</p>	 <p>Step 8. TFO Hochron collects the Sony DVD drive, leaving that space on the bookshelf empty.</p>	 <p>Step 9. An agent adds the LaCie hard drive back on the bookshelf. SA Mills photographs it (Photo #72) and SA Mergen logs the shot in the</p>

photographic log. Ex. E, Pg. GX 502-A71	<u>This photo is a reconstructed scene.</u>	photographic log. Ex. E, Pg. GX 502A-72
 Step 10. TFO Hochron collects the LaCie hard drive, leaving that space on the bookshelf empty once again. <u>This photo is a reconstructed scene</u>	<i>(This cell is intentionally left blank)</i>	<i>(This cell is intentionally left blank)</i>

c. Former FBI Experts' Conclusion

Former FBI Senior Evidence Technician DeNardo concluded:

“[T]he two added books were about sex trafficking—the central alleged crime—and were placed on a desk, photographed without an item label, and left uncollected. This defies logic. Given the search warrant specifically sought ‘sex trafficking paraphernalia,’ such books would have been deemed highly relevant, photographed in place, and collected, especially since a less relevant book on torture was pre-choreographed and collected as Item 3.

Based on my experience conducting hundreds of searches, I conclude that the only plausible explanation is that these two books on sex trafficking were planted to create an incriminating and prejudicial narrative.”

Retired FBI and OIG Special Agent Bowling concurred with this assessment.

Regardless of whether the books were planted, the actions of the agents undeniably constitute evidence fabrication, and this fabricated evidence was knowingly shown to the jury.