

* FILED *

2022 JUN 21 PM 11:29

CLERK
U.S. DISTRICT COURT
E.D.N.Y.
ANDREW MUELENBACH, CLERK

EXHIBIT E

Affidavit of Frank Parlato, Jr.

State of Florida
County of Monroe

COMES NOW Frank Parlato, Jr., being first duly sworn, under oath, and states that the contents of Attachment 1 are true and correct statements of relevant facts and his opinions, to the best of his knowledge and belief, and that the contents of the redacted emails in Attachment 2 are true and accurate.

Signature: Frank Parlato

Date: June 21, 2022

State/Commonwealth of VIRGINIA)
 City County of Newport News)
)

On 06/21/2022, before me, Rushane E Smith,
Date Notary Name

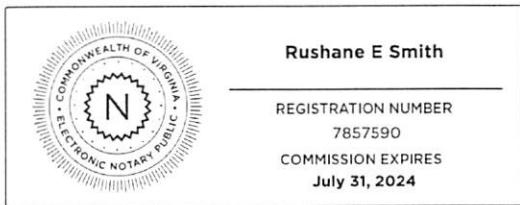
the foregoing instrument was subscribed and sworn (or affirmed) before me by:

Frank Parlato
Name of Affiant(s)

- Personally known to me -- OR --

Proved to me on the basis of the oath of _____ -- OR --
Name of Credible Witness

Proved to me on the basis of satisfactory evidence: _____ **driver_license**
Type of ID Presented



WITNESS my hand and official seal.

Notary Public Signature:

Notary Name: Rushane E Smith

Notary Commission Number: 7857590

Notary Commission Expires: 07/31/2024

Notarized online using audio-video communication

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Verification Affidavit

Document Date: 06/21/2022

Number of Pages (including notarial certificate): 2

ATTACHMENT 1

Statement

June 21, 2022

My name is Frank Parlato. I am a resident of Florida.

I am 67 years old. I have no criminal record. Though I stand indicted by the bad faith efforts of the US DOJ and Keith Raniere - starting in 2011.

I am not a supporter of Keith Raniere. I am not now and never was a member of NXIVM. I worked as a consultant for Raniere in 2007-08.

Mark Vicente, filmmaker, whistleblower, former Executive Board Member of NXIVM, said on HBO's The Vow: "Frank Parlato used to work for Keith and NXIVM. He left on bad terms, and the company went after him. To fight back, he created the blog called the Frank Report, to share news he was hearing about NXIVM."

I have published around 5,000 stories on NXIVM and Raniere. These stories have had more than 20 million views.

The New York Times acknowledged in their seminal story that I broke the story of DOS and the branding of women.

"Many of Mr. Raniere's followers learned of the secret society from a website run by a Buffalo-area businessman, Frank R. Parlato Jr. Mr. Parlato had been locked in a long legal battle with two sisters, Sara and Clare Bronfman, who are members of Nxivm, and the daughters of Edgar Bronfman, the deceased chairman of Seagram Company....

"In early June [2017], Mr. Parlato published the first in a torrent of salacious posts under the headline, 'Branded Slaves and Master Raniere.'"

Sarah Edmondson told her story to HBO. She said, "I told Frank about my branding experience, so that he could expose DOS in time to stop the next session.... We were successful. The word about Frank's blog spread in the community. And because of this heat, the next branding ceremony was called off."

DOS ended with my reporting - four months before the New York Times story. No woman was branded again.

India Oxenberg told her story on Starz 'Seduced.'

India said, "Even within NXIVM, no members outside of DOS were supposed to know that it existed. As soon as the [Frank Report] posts started coming up, there was a ton of questions, and a lot of chatter. My slaves left immediately after that. And none of them had to complete the seduction assignment or be branded. That was a huge relief."

Her mother Catherine Oxenbergh first told me of this shocking sorority. She wanted to get her daughter out. She wrote, "Frank was fearless. And once I'd given him this information, he ran with it. And he didn't stop.... He was an unstoppable force."

Vicente from the Vow: "When Frank came out with the news it set the whole organization into panic. A lot of people began asking questions. And that was the idea – it's not just to expose what's going on, it was also about getting people to leave, getting people away from danger."

The danger was Raniere.

I present this to show that I am not a supporter of Raniere.

INVESTIGATING INVESTIGATORS:

The DOJ in their sentencing memorandum of Keith Raniere wrote:

"Raniere's crimes were difficult to investigate and were uncovered due to more than a year-long investigation that required significant government resources, including interviews of more than a hundred individuals."

That was a lot of investigating for it all to shift at the last minute and come down from 100 to one.

I am a private citizen without authority. I agreed to investigate the investigation and publish the results.

I am publishing the report, "Analysis of Allegations of FBI Tampering of Evidence in US v Raniere." I will publish it on www.frankreport.com.

Suneel Chakravorty co-authored the report. We have different views of Raniere. Chakravorty is Raniere's power of attorney.

I am Raniere's adversary. I am opposed to Raniere and deplore what he has done.

I believe Raniere is guilty of abusing the victim, Camila. He abused her. It was child sexual exploitation.

Chakravorty believes Raniere has been falsely convicted.

Both Chakravorty and I investigated the competency of the evidence. I spent more than one year in my investigation.

For my part, this is an investigation. I am as interested in exonerating the FBI as I am in proving they tampered. Which is to say there is a lot of evidence.

I do not claim to know the definitive answer. We are not prosecutors who seek only evidence of guilt and wear trial, or truth blinders. Our report will lay out a clear path to finding the answer.

CAMILA:

At a pretrial hearing, AUSA Moira Penza said Camila "goes throughout this case. I mean, there will be almost -- there's very little evidence in this case that does not relate to that victim."

It became a trial about Camila without Camila.

An FBI SA agent actually portrayed her on the witness stand, reading her texts for hours, as an AUSA read Raniere.

They presented her medical history. Her sister and others spoke about her. Her landlord, her nurse, and others spoke.

An FBI agent testified he saw so many naked photos that he could identify dates without the metadata.

Another agent discussed the evidence of dating her photos with metadata.

Then there was the most dramatic scene in the trial. An FBI agent walked her photos in, in a red binder - and everyone sat in stony stillness. She opened the red binder before the judge, and he turned away. The jury saw, and then she brought them the binder - of Camila. They jury shuddered. They looked down. They turned away. All the while, she was not at the trial.

Her abortion records, her appendectomy. Her extremely private texts were read. The most private personal texts.

Her diary was shared. They had pictures of her and discussed the reasons for an alleged suicide attempt. Pictures, medical records and hearsay.

She was a conspirator when that let evidence in, and a victim when that helped.

Despite being the crucial victim, Camila did not testify at the trial.

This was a trial about Camila without Camila.

And digital evidence supplanted the live witness.

Raniere's counsel did not get the digital evidence either. The evidence that convicted him - the digital evidence - was withheld until days before trial. Some of it was never provided.

It is understandable that the government might not have wanted her to testify. She was no longer a child. She was 28. She was one of the First Line of DOS. A DOS First Line master.

AUSA Penza said of the First Line. "Every member of the first line was a co-conspirator. There is no question; there's no distinction about that... When they joined DOS, they knew that the defendant was their grandmaster.... They conspired with the defendant to conceal his identity and to recruit new people... to get naked pictures. To get property. And... to get women to have sex with the defendant.

Camila was part of the scheme that confined her sister, Daniela.

At trial, Judge Garaufis would ask: Is Cami a co-conspirator?

AUSA Hajjar: Your Honor, she was involved -- as Daniela and Lauren Salzman testified, she was involved in the confinement of Daniela in the room, and so, in that respect, she was assisting in a criminal scheme. She is, however, a victim in other respects.

The Judge later said "she is a co-conspirator, or alleged to be a co-conspirator." The allegation came from the prosecution, not the defense.

And Camila participated in the sex trafficking count. When Raniere blindfolded and tied Nicole to a table in her apartment.

There was very little evidence that did not relate to that absent victim.

New evidence suggests the DOJ calculated they did not want her as a witness.

New evidence suggests the DOJ could have called her, but decided not to.

They might have put in place mechanisms available to federal prosecutors to have a witness come to court and testify.

Yes, She Is a Victim.

I was present when Camila said she was a victim of sexual abuse at Raniere's sentencing. She spoke after the trial, after his conviction.

I heard Camila say Raniere abused her when she was 15. I heard her say he took pictures of her when she was 15. I believe her.

But the forensic evidence is questionable. Evidence seems to have been withheld from the defense. Expert witnesses seemed to have made misrepresentations. The FBI bungled evidence.

There were instances of evasive testimony.

And new evidence contradicts the idea that the DOJ could NOT produce her.

Neil Glazer:

I had many communications with attorney Niel Glazer, as a reporter.

Before and during the DOJ investigation, alluded to above.

Sometimes we had conflict. I also have tremendous respect for his advocacy for clients who were victims of Raniere. Glazer is one of the most zealous advocates for clients I ever saw or can imagine.

There may not have been a case against Raniere, but for his efforts.

I have included in my report a few small excerpts from our correspondence. They are probative to the tampering investigation. They show his zealous advocacy. They can also answer if the FBI tampered.

I do NOT think Glazer would participate in tampering or permit a client to do so. One of the best reasons to doubt FBI tampering is Glazer. He represents Camila and her sister, Daniela.

The photos and the digital evidence are at the heart of the allegations.

Glazer would not tolerate tampering or suborning of perjury.

Yet if tampering had occurred, it might have come through other sources.

I have redacted the great majority of the text of the scant few emails. But they constitute new evidence.

His client Camila stated Raniere abused her and took photos of her. I believe her.

But the question is, are the photos the government used as evidence that they purport were her at 15, found accidentally as they claim?

Are the forensic dates accurate? Or were they tampered with?

Some of his clients may know the answers.

If the photos are accurate, were they found where the FBI said they found them?

I am not interested in proving Raniere did or did not take photos of Camila. I assume he did.

What I want to know is did the government tamper with evidence to convict Raniere of a crime he DID commit?

My colleague Chakravoty does not believe Raniere is guilty. He believes the FBI tampered.

I have reviewed enough evidence that I believe Raniere abused Camila. And I believe the FBI may not have had the evidence to prove it.

I think it is also likely that the FBI did not "accidentally discover" the evidence as they claim.

Some evidence causes me concern. I will address that in our report.

Either the photos were there at 8 Hale or they weren't. Either they were there from the start or they made a belated arrival.

Either they are Camila when she was 15, or they are not.

A non-party may have supplied evidence beneath the nose of official actors.

Or maybe the photos were there - for years hiding in plain sight. Despite evidence contradicting it.

I reject these false equivalences:

Camila said Raniere abused her when she was 15, hence the evidence used by the FBI is competent. Raniere is guilty, so the FBI evidence is competent. Camila said Raniere took photos of her when she was 15, so the evidence must be competent.

The DOJ made this argument. It is illogical.

Camila has not identified the actual evidence.

Due Process for those law enforcement know are guilty

The FBI should not present tampered evidence against a guilty defendant.

If we allow this perfidious camel to nose into the tent of our enemy, we invite his presence in all our tents. He will be our constant companion.

Camila is a victim, Raniere committed the crime. But the FBI has to prove it. They cannot cheat the jury.

If they are innocent, we should find out. Soon.

That is at least partly because Neil Glazer represents clients who may hold the key.

Either those photos were sitting on the hard drive or came from somewhere else.

Our report will appear on FrankReport.com

ATTACHMENT 2



Frank Parlato <frankparlato@gmail.com>

Re: taking an affirmative step

[REDACTED]
To: FRP <frankparlato@gmail.com>

Wed, Sep 27, 2017 at 4:24 AM

Please consider posting the following.

[REDACTED]

Post: To all former and current victims of, and those who have information about, these various Raniere related entities, and Raniere, Bronfman, Salzburg, etc.: there are law firms looking at this.

[REDACTED]

I have spent a year investigating and learning about the whole situation. I believe there may be something to be done.

[REDACTED]

[REDACTED]

There are a few categories of preliminary interest, subject to revision as facts are developed and law researched. One is to do the investigation and legal research necessary to deliver a prepackaged prosecution. This is how these things are done. Another is one or more large collective or class actions. Another is a number of coordinated actions by individuals and small groups of individuals. None are mutually exclusive

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Interested Outsider

On Thu, Sep 21, 2017 at 10:39 AM FRP <frankparlato@gmail.com> wrote:

I will be glad to discuss the matter.

[REDACTED]

[REDACTED]

Sent from my iPhone



Frank Parlato <frankparlato@gmail.com>

Talk

To: FRP <frankparlato@gmail.com>

Sat, Oct 21, 2017 at 2:10 AM

I think you figured this out, but Neil Glazer. My firm is Kohn, Swift & Graf, P.C. In Philadelphia.

I have been watching, learning and speaking with people for a year. I don't know if litigation is the best approach, still have much to learn and figure out, but I want to help these people anyway I can, in the courts or elsewhere.

If I can destroy this guy, take his world down, I will gladly do it. If I can redistribute the Bronfman sisters' fortunes to the victims, I will do that as well.

Some of this will not be easy, we have to do a lot of hard work, and need to make some new law, and it will require my firm to invest many millions, but it can be done and I am acutely interested. And as I said, litigation is only one option. He can be taken down.

Neil
[Quoted text hidden]



Frank Parlato <frankparlato@gmail.com>

legal

Neil Glazer [REDACTED]
To: frankparlato@gmail.com

Thu, Oct 26, 2017 at 2:44 PM

I've been given the green light to more actively pursue legal angles, civil and criminal. [REDACTED]

[REDACTED] If all I do is on the criminal front, I won't charge. If there is civil litigation, nobody pays up front, we put in the time and cover all expenses; if and when there is a damages award or settlement money, the clients agree to the lawyers taking a fixed percentage.

Neil



* FILLED *

Frank Parlato <frankparlato@gmail.com>

2017 JUN 21 PM 11:29

New coverage

CLERK
U.S. DISTRICT COURT
FEDERAL BUREAU OF INVESTIGATION
ALBANY, NEW YORK
MAILING AND DROPOFF BOX

Tue, Nov 7, 2017 at 12:03 AM

Neil L.Glazer <nglazer@kohnswift.com>
To: "frankparlato@gmail.com" <frankparlato@gmail.com>

I am not working on the civil litigation angle at the moment, there are far more important matters to resolve. There are moving pieces you are unaware of, interested eyes beyond the Albany region. I would like you to consider whether posts might create a misimpression of leaky investigations or offices.

We are learning precise locations of evidence, we need time to get rock solid warrants.

I am working pro bono to bring this thing to a just conclusion that you will surely applaud. This is a costly undertaking, in expenses and value of time. Much of these expenses is out of my own pocket and the cost in time will reduce my compensation.

Neil

Neil L.Glazer



Frank Parlato <frankparlato@gmail.com>

Dani

Neil L.Glazer <nglazer@kohnswift.com>
To: "frankparlato@gmail.com" <frankparlato@gmail.com>

Sat, Jun 9, 2018 at 2:19 AM

You just posted a whole piece about Dani, naming her multiple times.

[REDACTED]

[REDACTED]

[REDACTED]

I am more devoted to Dani's well-being than any other client, and you know that says a lot. There is nothing I won't do to protect her.

[REDACTED]

Neil L.Glazer
[REDACTED]

We've Moved!
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103

[REDACTED]

[REDACTED]



Frank Parlato <frankparlato@gmail.com>

Once more

Neil L.Glazer <nglazer@kohnswift.com>
To: "frankparlato@gmail.com" <frankparlato@gmail.com>

Sat, Jun 9, 2018 at 4:09 AM

I implore you to please take down the post.



We represent dozens, growing by the day. The criminal investigation is massive and the civil action will be unprecedented. That is soon. I will give you first view before we file.

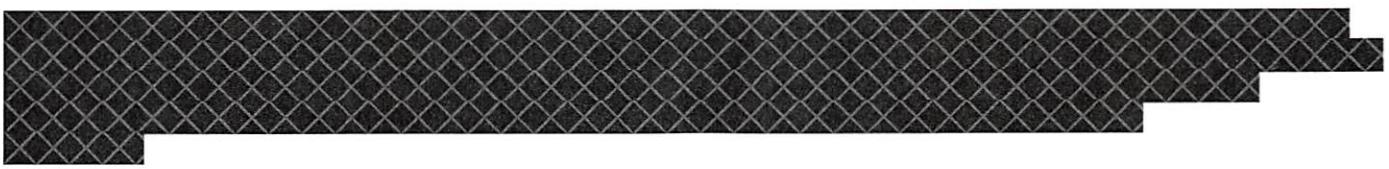




Neil L.Glazer



We've Moved!
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103



Frank Parlato <frankparlato@gmail.com>

Camila [REDACTED] still in Nxivm

Neil L.Glazer <nglazer@kohnswift.com>
To: Frank Parlato <frankparlato@gmail.com>

Wed, Apr 3, 2019 at 8:11 AM

[REDACTED]

Cami has been interviewed. She is not testifying for Raniere. FBI victim services are in contact with her to make sure she knows they will help her to get help. No, she has not fully come forward, but she has been willing to stay in contact with them and the fact is they don't need her testimony to prosecute and convict Raniere for what he did to her. Moira told me, and this is a quote, "we have all the evidence we need." [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

civil case and have more than 80 clients to serve, and it grows by the week.

I am building a

Neil L.Glazer
[REDACTED]

We've Moved!

KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103

From: Frank Parlato <frankparlato@gmail.com>

Sent: Wednesday, April 3, 2019 12:59 AM

To: Neil L.Glazer

Subject: Re: Camila [REDACTED] still in Nxivm

[REDACTED]

Best
Frank

On Wed, Apr 3, 2019 at 12:17 AM Neil L.Glazer <neglazer@kohnswift.com> wrote:

[REDACTED]

[REDACTED]

The image consists of a series of horizontal bars arranged vertically. The bars alternate between two types of patterns: a solid black color and a pattern of small white squares forming a diamond grid. The lengths of the bars also vary, with some being full-width and others being shorter, creating a staggered effect. The overall appearance is like a decorative border or a series of abstract horizontal lines.

Neil I. Glazer

A dark, textured rectangular block with a stepped profile, resembling a thick book or a block of material. It has a fine, diamond-shaped grid pattern across its surface.

From: Frank Parlato <frankparlato@gmail.com>

Sent: Tuesday, April 2, 2019 10:36 PM

To: Neil L.Glazer; Neil Glazer

Subject: Camila [REDACTED] still in Nxivm

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]