## DECLARATION OF RANDALL RATLIFF

I, RANDALL RATLIFF, declare as follows:

- 1. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.
- 2. I am currently employed by Morpho Trust in Georgetown,
  Indiana. From approximately summer 2006 to approximately February
  2013, I was employed by Best Buy/Geek Squad in its Brooks, Kentucky
  facility as an Assistant Manager and then General Manager. As
  General Manager, I was responsible for customer service, IT, asset
  protection, data recovery, safety, facilities, and community events.
  Data recovery was a department within the Geek Squad.
- 3. Justin Meade was a supervisor in that department. James Christophel was an Assistant Manager with the Geek Squad. As part of the data recovery process carried out in that department to fulfill service orders on customers' computers, pictures and videos sometimes come up on the screen of the computer when the technician carries out the recovery. When technicians in the data recovery department found suspected child pornography on customers' computers in such a situation, they were to stop working immediately and notify their supervisor. A supervisor or I would contact the FBI. As time went on, Justin Meade and James Christophel contacted the FBI more than I did, as they had more technical expertise. The computer with the suspected child pornography on it would be locked up in a safe until the FBI came to look at it.
- 4. It was Best Buy policy that technicians were not to look for child pornography or any other files on customers' computers beyond what was required by the service order for the computer.

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Technicians knew it was a terminable offense if they looked at files on customers' computers beyond what was required by the service order.

- 5. Contact with the FBI was limited to supervisors, including Justin Meade, James Christophel, Mike Hans, and me. To my knowledge, technicians who carried out the actual repairs did not have contact with FBI agents.
- 6. I was never instructed by any agent of the FBI, or any officer or agent of any other law enforcement agency, to search for child pornography, or evidence of any other crime, on customers' computers at Best Buy, at any time. I was also never instructed by anyone at the FBI or at Best Buy to ask my subordinates to do so. I never instructed my subordinates to search for child pornography, or evidence of any other crime, on customers' computers at Best Buy, at any time. I directed them to follow the Best Buy Geek Squad policy of not looking at files or anything else on a customer's computer beyond what was required to carry out the service order. I am unaware of any other supervisor instructing anyone at Best Buy Geek Squad to search for evidence on behalf of the FBI. My intent in contacting the FBI about any evidence found by technicians at Geek Squad was to carry out the Best Buy policy of notifying the FBI when such items were found.
- 7. I was paid \$500 in 2011 by Special Agent Tracey Riley. It made me uncomfortable to receive money and I contacted our legal department. I gave the money to charity. I did not understand the payment to be given as encouragement to find child pornography on behalf of the FBI, and I was never encouraged to find child pornography on customers' computers for the FBI. The FBI indicated

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to me they could not take the money back because they had to spend it as part of their budget.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Georgetown, Indiana, on <a href="O4 January.2017">O4 January.2017</a>
[DATE].

RANDALL RATLIFF