DECLARATION OF RICHARD BOSWELL, III

I, Richard Boswell, III, declare as follows:

- 1. I am a Supervisory Special Agent with the Federal Bureau of Investigation ("FBI"), in the Training Division at Quantico,
 Virginia. 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. From January 2007 to June 2015, I worked as a Special Agent in the Louisville, Kentucky Field Division of the FBI. I worked in a violent crime squad that investigated, among other crimes, child exploitation cases, during my entire time in Louisville. Part of my responsibilities included responding to the Best Buy Geek Squad facility in Brooks, Kentucky, when employees of that facility would contact the FBI to notify us that they had come across child pornography on a customer's device.
- 3. I responded to Best Buy on a number of occasions in 2007 and 2008 regarding suspected child pornography. It was my understanding on each occasion that the suspected child pornography had been found by a technician in the course of the technician carrying out a service order as part of their duties as a Best Buy Geek Squad employee, and not because any technician was specifically searching for child pornography.
- 4. The standard conversation I had with every individual that I had contact with at Best Buy was to direct the person not to do anything above and beyond what they would normally do as a Best Buy Geek Squad employee, and that if they found something in the course of carrying out their duties as a Geek Squad employee that they thought was inappropriate, not to further search the material or do

anything beyond what their duties as a Best Buy Geek Squad employee required.

- During 2007 and 2008, I am aware of four employees of Best 5. Buy Geek Squad in Brooks, Kentucky, who contacted us regarding child pornography on customers' devices. To best track the relationship with these individuals and document contacts the FBI had with them, we classified these individuals as confidential human sources ("CHS's"), though they were simply employees at the Best Buy Geek Squad who happened to be in a position to report child pornography that technicians had come across on devices during the course of repair. I had contact, in particular, with Michael Hans, Justin Meade, Randall Ratliff, and Michael Rodgers. I never asked any of them, or any other employee at Best Buy Geek Squad, at any time, to search for child pornography or evidence of any other crime on behalf of the FBI. I am also not aware of any other FBI agents asking any of them, or any other employee at Best Buy Geek Squad, at any time, to search for child pornography or evidence of any other crime on behalf of the FBI.
- 6. I paid Randall Ratliff \$500 in 2008 and I paid Michael Hans \$500 in 2008. The money was not given as encouragement to find child pornography or evidence on behalf of the FBI. Both Ratliff and Hans were reluctant to accept the money.

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 Quantico, Virginia, on 11/03/2017.

RICHARD BOSWELL, III

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