



U.S. Department of Justice
Federal Bureau of Investigation

**DECLARATION OF LUKE CHURCH, SPECIAL AGENT,
FEDERAL BUREAU OF INVESTIGATION**

I, LUKE CHURCH, do hereby declare and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been since August 2022. As a Special Agent, I have received training at the FBI Academy located in Quantico, Virginia, including training on investigative methods and training specific to counterintelligence and espionage investigations. I am currently assigned to a squad at the FBI Washington Field Office, Counterintelligence Division, where I primarily investigate counterintelligence and espionage matters. During the course of these investigations, I have conducted or participated in witness and subject interviews, service of subpoenas, the execution of search and arrest warrants, the seizure of evidence, including computer, electronic, and email evidence, as well as requested and reviewed pertinent records. Based on my experience and training, I am familiar with the requirements for the handling of classified documents and information. I am also familiar with the methods used by individuals engaged in the unlawful use or disclosure of classified information.

2. I am currently investigating the activities of JACK DOUGLAS TEIXEIRA ("TEIXEIRA"), whom I believe willfully retained and transmitted classified national defense information to a person not entitled to receive it in violation of 18 U.S.C. § 793(b) and (d) and 18 U.S.C. § 1924.

3. I make the following statements based upon my personal knowledge and information made available to me in my official capacity.

I. U.S. Government Agency Audit Data

4. During the course of my investigation, I had occasion to interact with the second U.S. Government Agency (“U.S. Government Agency 2”) described in the Affidavit in Support of an Application for a Criminal Complaint and Arrest Warrant (“Affidavit”) for TEIXEIRA.

5. As articulated in the Affidavit, U.S. Government Agency 2 has the ability to monitor certain searches conducted on its classified networks. U.S. Government Agency 2 also has the ability to conduct an audit of certain documents and links that a user accesses on its classified networks.

6. On April 17, 2023, I observed an audit conducted by a subject matter expert affiliated with U.S. Government Agency 2 for all searches TEIXEIRA conducted across an Intelligence Community-wide system for which U.S. Government Agency 2 acts as a service provider. The audit yielded results dating back to February 26, 2022.

7. These audit results indicated that TEIXEIRA conducted hundreds of searches on the classified network on a number of subjects, many of which related to the Russia-Ukraine conflict.

8. In addition, on or around July 30, 2022, TEIXEIRA searched for the following terms: “Ruby Ridge”; “Las Vegas shooting”; “Mandalay Bay shooting”; “Buffalo tops shooting”; and “Uvalde.”

9. During the course of my investigation, I have also reviewed audit data from U.S. Government Agency 2 regarding certain documents that TEIXEIRA accessed.

That audit data revealed that TEIXEIRA accessed hundreds of classified reports and/or documents on his classified network.

II. Interviews of Teixeira Colleague


10. As part of my investigation, I have also participated in interviews of multiple individuals who were associated with Teixeira. Among the individuals I interviewed was a colleague of Teixeira in the Air Force National Guard.

11. During the course of that interview, that colleague recalled that on Teixeira's last shift before his arrest, Teixeira told him he had a new phone number and email address. When asked if he had been hacked, Teixeira responded, "something like that." Teixeira then explained that his phone flew out of the window of his truck while he was driving and that it was run over by a semi-truck.

12. The same colleague told me that Teixeira was very quiet, but often talked about guns. He also said he believed he would be the first person Teixeira would shoot if Teixeira were to shoot anyone in the workplace.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Luke Church
Special Agent, Federal Bureau of Investigation