

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

- 3. During the course of my investigation, I have reviewed records lawfully obtained from a social media platform where TEIXEIRA originally posted classified national defense information (the "Social Media Platform"). As described in the Affidavit in Support of an Application for a Criminal Complaint and Arrest Warrant ("Affidavit") for TEIXEIRA, the Social Media Platform provided the FBI with subscriber information for the user of a particular username that indicated the billing name associated with that username was "Jack Teixeira," and the billing address associated with that username was a residence I know to be associated with TEIXEIRA.
- 4. Records from the Social Media Platform reflect that TEIXEIRA sent more than 40,000 messages between November 1, 2022 and April 7, 2023. I have reviewed portions of these records and observed the following interactions between TEIXEIRA and others on the server:

• 23 November 2022:

TEIXEIRA: "I hope isis goes through with their attack plan and creates a massacre at the World Cup"

TEIXEIRA: If I had my way I'd kill a fuck ton of people

TEIXEIRA: Bc in all honesty you have to TEIXEIRA: Whether or not you like it

TEIXEIRA: Seriously I would be forcibly culling the weak minded

4 February 2023:

User: Seeing a lot of fed cars sneaking around as well

TEIXEIRA: Like?

User: The usual fedmobile chevies and gmc

TEIXEIRA: See what's funny is those can be fed cars TEIXEIRA: but glow[redacted] use dodge caravans ALOT

User: Scary

TEIXEIRA: To make people disappear and shit

. . .

TEIXEIRA: I've been tempted to buy one and make it an assassination van

. . .

User: Speaking of caravan

TEIXEIRA: Set up an ar and sniper blind

• 10 February 2023 [soliciting advice for the proper rifle size to operate from the back of an SUV]

TEIXEIRA: . . . i wanted a can on an ar to shoot out of an suv

TEIXEIRA: accurately

. . .

User: Unless you have the whole passenger area converted for gun

activities

User: If so 12.5-14.5 would make sense

TEIXEIRA: w/can?

User: Yeah

User: Cans are important be it makes it sorta hard to tell where its

coming from or what it was

. .

TEIXEIRA: well for this it would be a crowded urban or suburban

environment

TEIXEIRA: so its essential

User: Would you use it to go through a crowd or nah

TEIXEIRA: the car or the gun?

User: Gun TEIXEIRA: no

TEIXEIRA: car is parked TEIXEIRA: window down TEIXEIRA: stationary or driver

User: Alr

TEIXEIRA: target on a sidewalk or porch

18 March 2023:

TEIXEIRA: Yeah I just fuckin hate school

TEIXEIRA: 2nd semester in and I already want to bomb the place

User: Real

User: School sucks shit

User: Just the structure and the campuses and shit

User: All piss me off

TEIXEIRA: I'm going fully online

TEIXEIRA: Bc it's way to far away for me to go in person

TEIXEIRA: Plus fuck college culture

User: Even for a gunsmithing degree the school part of it is just the

worst

User: If i lived in a dorm i would firebomb it

TEIXEIRA: Same

TEIXEIRA: Fuck these places

• 30 March 2023:

User: Also I'm now fully convinced SUVs and crossovers serve no

fucking purpose

TEIXEIRA: The only exception I'll give is Muh Yukons,

Escalades, and

suburbans

User: Wagons superior User: Honestly true SUVs User: Not the shit we have

TEIXEIRA: They are mobile gun trucks to me

TEIXEIRA: Off-road and good assassination vehicles

• 23 November 2022:

User: Isnt that shit classified

User: ?

TEIXEIRA: everything that ive been telling u guys up to this point

has been lol

TEIXEIRA: this isnt different

User: Well

User: You rly trust everyone here then

TEIXEIRA: i have plausible deniability and non of them know

anything

incriminating about me

TEIXEIRA: no one has a point of contact to my work

TEIXEIRA: no one knows where i work

TEIXEIRA: and no one knows how to identify me

TEIXEIRA: dw ive thought of that

• 8 December 2022:

TEIXEIRA: that is one page

TEIXEIRA: the entire thing will take up paragraphs of paragraphs

TEIXEIRA: i usually split it up by agency

TEIXEIRA: that portion i posted is from the [REDACTED]

• 13 December 2022:

TEIXEIRA: Since you wanted the full report instead of the brief few summaries I give in [REDACTED] here you go, I've reported stuff like this almost daily as I get it to my friends and have always done it in this format

TEIXEIRA: I have not yet done todays

TEIXEIRA: I also omit a decent amount as I don't think it's

pertinent and there's just so much of it

TEIXEIRA: Not gonna type out 35 pages of information it's just

not happening

TEIXEIRA: So I tailor it and take important parts and include as

many details as possible

19 March 2023:

TEIXEIRA: Like to thank everyone who came to the thread about the current event, going on and participated and listen to me, cover set event since it's beginning, I was very happy and willing and enthusiastic to have covered this event for the past year and share with all of you something that not many people get to see something very few people in fact, get to see, but despite all of this, I've decided to stop with the updates

. .

TEIXEIRA: If you guys do you want happenings that pertain to your country or events or politics or whatever you can DM me and I can tell you what I have, but it's going to always be a brief summary

TEIXEIRA: I can't promise, speed or prompt response, but I will respond to you eventually so offers on the table. If you want to take it until then I'll still be sticking around here still be posting shit, so not going anywhere don't worry about that.

• 6 April 2023:

User: i think your thingies got passed along User: seeing pro rus telegram with them

TEIXEIRA: Which ones?

User: i screenshotted one can i send?

. . .

TEIXEIRA: Sure

• • •

User: is it actually one of them btw?

TEIXEIRA: Not commenting

User: aight

User: ima delete it too

User: did you share them outside of abis?

TEIXEIRA: I think I'm done talking about this

User: ok

TEIXEIRA: Permanently

User: sorry if I pushed you here

TEIXEIRA: It's fine

TEIXEIRA: Just letting u know I'm leaving the server

TEIXEIRA: Don't make a huge deal of it

• 7 April 2023:

User: its so over TEIXEIRA: Ik

TEIXEIRA: Dw about it

. . .

User: its a pretty dead server anyway

TEIXEIRA: On this note I think it'll be best we head our separate

ways

TEIXEIRA: Another thing

TEIXEIRA: If anyone comes looking, don't tell them shit

User: wont

User: wont send any info on your account or screencaps

TEIXEIRA: Pass this on to [User 2, User 3, User 4, User 5] and

most others who were in that thread

. . .

TEIXEIRA: I mean tell them not to tell anyone

. . .

TEIXEIRA: Hey u still on?

TEIXEIRA: Whenever you get this, try to delete all my messages

in civil discussions

TEIXEIRA: Especially those not in the thread

User: kk

TEIXEIRA: Wait got an idea TEIXEIRA: Give me an invite

TEIXEIRA: Then ban me and delete all messages

User: alright

User: gave you access TEIXEIRA: Ok now do it

TEIXEIRA: It should give an option to delete all messages

User: it only goes to past 7 days TEIXEIRA: Fuck Alr nvm

TEIXEIRA: Just find stuff from Feb 2022 in civil discussion and

delete it during your free time

5. The interactions described above do not reflect all my knowledge on this matter or all relevant, inculpatory, or violent messages that I observed. They are instead offered to provide the Court with representative sample of certain messages attributable to TEIXEIRA.

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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.

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Special Agent, Federal Bureau of Investigation