

HARDY MYERS
ATTORNEY GENERAL



PETER D. SHEPHERD
DEPUTY ATTORNEY GENERAL

DEPARTMENT OF JUSTICE

1162 Court Street NE
Justice Building
Salem, Oregon 97301-4096
Telephone: (503) 378-4400
TTY: (503) 378-5938

April 21, 2003

Greg M. Reynolds
35612 SE MacInnes Road
Corbett, OR 97019

Dear Mr. Reynolds:

Attorney General Hardy Myers has asked me to respond to your letter concerning your executive clemency application.

Regrettably, we are unable to assist you with this matter. The Department of Justice serves as the law firm for state agencies, boards, commissions and elected officials. Under Oregon law, the Department may not provide legal advice to private citizens. It is the Governor, not the Attorney General who has jurisdiction in clemency issues.

So we have an elected official to solely defend the RICH...

You may wish to contact a private attorney for further assistance. If so, you can obtain a list of attorneys who specialize in this area of law by contacting the Oregon State Bar's Lawyer Referral Service at 1-800-452-8260.

I hope this information is useful.

Sincerely,

A handwritten signature in black ink, appearing to read "KEVIN NEELY", is written over a horizontal line.

KEVIN NEELY
Public Affairs and Legislative Coordinator

AGS12192

REYNOLDS00000413

GORDON H. SMITH
OREGON

COMMITTEES
BUDGET
COMMERCE
ENERGY AND NATURAL RESOURCES
FOREIGN RELATIONS

United States Senate

WASHINGTON, DC 20510-3704

November 12, 2002

Mr. Greg M. Reynolds
PO Box 261
Portland, OR 97207


Dear Mr. Reynolds:

Thank you for your recent letter regarding your request for clemency. I appreciate the time you took to contact me about this matter.

Unfortunately, as a federal legislator, I do not have authority over judicial issues, local government or state government. My primary responsibility is to work toward the passage of federal legislation and to ensure that federal agencies adhere to the guidelines established by Congress. However, in an effort to be of all possible assistance, I have expressed my interest by forwarding a copy of your letter to Governor Kitzhaber, asking him to review your concerns and contact you directly regarding this matter.

I am confident that your concerns will be given thoughtful consideration and expect you will be hearing from the appropriate officials in the near future. Please do not hesitate to contact me if I can be of further assistance to you with federal matters.

Sincerely,



Gordon H. Smith
United States Senator

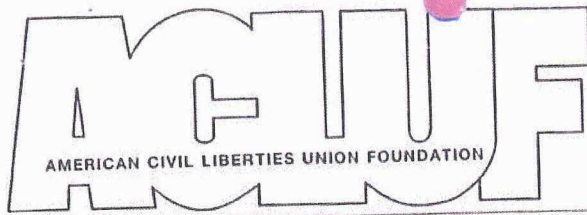
*Again, This A Federal
matter affecting everyone's
Civil Rights*

GHS:gs

www.gsmith.senate.gov
oregon@gsmith.senate.gov

PRINTED ON RECYCLED PAPER

REYNOLDS00000414



LEGAL DEPARTMENT

www.aclu.org

National Headquarters 125 Broad Street, New York, NY 10004-2400

Tel (212) 549-2500 Fax (212) 549-2651

September 19, 2002

Greg Reynolds
PO BOX 261
PDX 97207-0261

Dear Mr. Reynolds:

We have received your letter and we are sorry to hear about the difficulties you are having. Unfortunately, the ACLU is not in a position to help you in this matter.

This response is in no way meant to reflect any judgment on the merits of your case. The ACLU is a private, non-profit organization that seeks to preserve and extend constitutional rights and privileges. Given our limited resources and the volume of requests that we receive, we do not, as a general rule, represent individuals in criminal cases.

If you wish to pursue your case, you should contact a private attorney. Your state's Bar Association should be able to provide you with the name of an attorney who practices in the appropriate field. If you cannot afford private counsel, you should contact a legal services organization.

Again, we regret that we cannot be of more assistance with your situation. Best of luck in resolving your difficulties. We are returning your materials in case you wish to send them elsewhere.

Sincerely,

National ACLU

*Just more people aware of these criminal
acts protecting the Rich.*

Nadine Strossen President

Anthony D. Romero Executive Director

Kenneth B. Clark Chair, National Advisory Council

Richard Zacks Treasurer



REYNOLDS00000415

August 22, 2002

PO Box 261
Portland, OR 97207-0261

Honorable John A. Kitzhaber
Governor of Oregon
State Capital
Salem, OR 97310

RE: Application for Executive Clemency Dated April 2002

Mr. Kitzhaber:

In my search for an attorney to handle my expungement, as requested by your office, I have run into several attorneys who feel that expungement proceedings should not be necessary as my constitutional rights were violated by the presiding judge in the case, and that I should pursue legal representation and the advice of the American Civil Liberties Union for further consideration if I am denied for another pardon in this extraordinary situation.

When I was charged in 1994, I was denied legal counsel as guaranteed by the constitution. Being an adult over the age of 18 with only a part time income I could not afford adequate counsel and my parents were no longer responsible for my legal defense. As a result I was unable to secure adequate legal counsel. In addition to this the prosecutor took advantage of that situation by charging me with a felony he did not have the evidence to support, as supported by the terms of the plea agreement which was incredibly lenient for the charges on the indictment. This is also supported by being cited on the night of the offence for, four misdemeanors, and then being charged for a felony on a first offence. The attorney who took my initial consultation assures me that any attorney who know what he was doing could have seen me acquitted or the charges reduced to a misdemeanor considering that there was no marijuana seized at the scene of the incident. I was a victim of a grave injustice and a prosecutor who took advantage of a young adult who was scared and denied legal representation.

This is an extraordinary situation that should have never come across your desk, as it should not have happened. I have learned a great deal since this occurred, both about the dangers of drugs and who the enemy really is. The police and the state. These people bend rules to suit their needs and hang innocent people in their own self serving interests. It is my intent that if this not pardoned, as it should be, to seek the advice of as many attorneys' as we can afford in the upcoming years, the advice of judicial review, if it exists in the state, and the American Civil Liberties Union. This was a gross violation of

REYNOLDS00000416

my constitutional rights regardless of the offence that occurred and it should not be allowed to stand.

Thank you for your kind review of my application and all supporting documents. I am sorry it took me nine long years to learn of these mistakes and blatant violations of my rights. I am hopeful it will not take any more time to further rectify the situation, so that I can return to work as soon as possible.

Sincerely,

Greg M Reynolds

cc: American Civil Liberties Union
Oregon Attorney Generals Office
Oregon Supreme Court

REYNOLDS00000417

JOHN A. KITZHABER, M.D.
GOVERNOR



March 22, 2002

Greg Michael Reynolds
PO Box 261
Portland, Oregon 97207-0261

Dear Mr. Reynolds:

The power to grant executive clemency is one that I take very seriously. I think a Governor's clemency power should be exercised sparingly, and only in the most extraordinary cases.

I have reviewed your application for a pardon, and have considered carefully whether it should be granted. Under the circumstances, I have concluded that a pardon is not warranted. I am therefore denying your application.

Sincerely,

John A. Kitzhaber, M.D.
Governor

JAK/GS/sad
E: clemency.denial@tr

*Civil Rights, & state laws
meant nothing to this man*

*That's why you must
be a sex offender
to see one!*



F. DOUGLASS HARCLEROAD
LANE COUNTY DISTRICT ATTORNEY

LANE COUNTY DISTRICT ATTORNEY'S OFFICE
125 EAST 8TH AVENUE, ROOM 400
EUGENE, OREGON 97401-2926
FAX ONLY (541) 682-3890
(541) 682-4261

October 1, 2001

John A. Kitzhaber
Governor of Oregon
State Capitol
Salem, Oregon 97310

Re: Executive Clemency Application of GREG MICHAEL REYNOLDS

Dear Governor Kitzhaber:

My office has received a copy of the Executive Clemency Application of Greg Michael Reynolds dated September 19, 2001. He applied earlier in January, 1995 for clemency, as well. Enclosed is a copy of that application and of police reports regarding the original incident. I note only that Mr. Reynolds version of events in his current application differs significantly from what he tendered in 1995 and still more significantly from that indicated in the police reports.

Sincerely,

F. DOUGLASS HARCLEROAD, District Attorney

D. Michael Pugh
Assistant District Attorney

Enclosures

✓ cc: Greg Michael Reynolds

*How could you possibly know
the official version when
D. Michael Pugh purged himself
so blatantly?*

REYNOLDS00000419

Dept of Homeland Security, Oregon Attorney General Hardy Mungers, the Multnomah County Sheriff's department, the Oregon Commission ~~for~~ for judicial fitness, Disability, the Canadian Govt, the UN, Counsel for Human Rights, and all with certified notarized copies of the complaint much like this ~~was~~ request for Habeas Corpus and assistance in protecting myself from the terrorists currently in Power in the State of Oregon. ~~not~~ protected by the aforementioned who have gone to great lengths to silence the truth about their illegal conduct & unethical behavior. In the years since I've been fighting this injustice I have been harassed by the government threatened by court investigators, Larry Smith, Multico. court investigator. In one incident 12/31/2003 2 members of the dept of ALS: 2 Multico Sheriff's deputies ordered my father who had just been released from prison after a bone marrow transplant to drive to Oregon City on ice & snow covered roads to Rowdy Tomblins house with no Drivers license & under the influence of morphine & other narcotics. They were all informed of his medical condition & that exposure

Lectlaw:
com/Def/
hool.htm

CIVIL CASE MANAGEMENT SHEET
(see SLR 2.011 for required use)

Case no.:

PARTIES (list overflow on separate sheets):

Pleading has Class Action Allegations: No ☒ Yes ☐

Plaintiffs:

Defendants:

GREG M REYNOLDS	CARDON OUTREACH

Related cases in Multnomah County Circuit Court (case number(s)):
120970073 AND CONGRESSIONAL CASE 00504061-74463

Has this case been filed previously, or is it related to a case file previously in this court or in another court?

No ☐ Yes ☒ In this Circuit Court Case No. 120970073
Yes ☒ In another Circuit Court Case No. 990086377 County: MULTNOMAH - PSU
Yes ☒ In US District Court Case No. 544-90-9915 Location: FEDERAL - SSA

PLAINTIFF: ☐ I am an Attorney Representing Plaintiff ☒ I am self-represented

Name: GREG M REYNOLDS OSB Number: _____

Phone Number: (503) 358-4827

Address: PO BOX 333 CORBETT OR 97019-0333 (City) (State) (Zip)
(Street)

Email address: GREYNOLDS@PORTLANDSTATE.ORG

☐ Notice of a change of address pursuant to UTCR 2.010(14).

TYPE OF CASE (select **ONE** Primary Subject selection does not bind or limit legal theories):

Tort and Employment

- | | |
|---|---|
| <input type="checkbox"/> Motor vehicle (including UM & UIM) | <input type="checkbox"/> Intentional personal injury (including assault, battery, false arrest, intentional infliction of emotional distress) |
| <input type="checkbox"/> Construction Defect | <input type="checkbox"/> Employer liability (ELL) |
| <input type="checkbox"/> Product liability | <input type="checkbox"/> Employment discrimination/wrongful discharge |
| <input type="checkbox"/> Wrongful Death | <input type="checkbox"/> Wage and hour |
| <input type="checkbox"/> Negligence | <input type="checkbox"/> Employment contract |
| <input type="checkbox"/> Professional negligence medical | <input type="checkbox"/> Other (specify): _____ |
| <input type="checkbox"/> Professional negligence (legal, other) | |
| <input type="checkbox"/> Defamation | |
| <input type="checkbox"/> Fraud | |
| <input type="checkbox"/> Intentional injury to property (including nuisance and trespass) | |

Contract (other than employment)

- ☐ Money Action (consumer credit)
- ☐ Insurance
- ☐ Negotiable instrument
- ☒ Other (specify): Breach Contract

Real Property

- ☐ Quiet Title
- ☐ Condemnation/Eminent Domain
- ☐ Foreclosure
- ☐ Specific Performance

Other

- ☐ Declaratory Judgment/Injunctive Relief
- ☐ Intellectual property
- ☐ Derivative Shareholder suit
- ☐ Securities

- ☐ Elder Abuse
- ☐ Interpleader (ORCP 31)
- ☐ Other (specify): _____

CIVIL CASE MANAGEMENT SHEET
(see SLR 2.011 for required use)

PARTIES (list overflow on separate sheets):

Plaintiffs:

GREG M REYNOLDS

Case no.:

Pleading has Class Action Allegations:

No ☒ Yes ☐

Defendants:

CARDON OUTREACH

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Name: GREG M REYNOLDS

OSB Number: _____

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- ☐ Product liability
- ☐ Wrongful Death
- ☐ Negligence
- ☐ Professional negligence medical
- ☒ Professional negligence (legal, other)
- ☐ Defamation
- ☐ Fraud
- ☐ Intentional injury to property (including nuisance and trespass)

- ☐ Intentional personal injury (including assault, battery, false arrest, intentional infliction of emotional distress)
- ☐ Employer liability (ELL)
- ☐ Employment discrimination/wrongful discharge
- ☐ Wage and hour
- ☐ Employment contract
- ☐ Other (specify): _____

Contract (other than employment)

- ☐ Money Action (consumer credit)
- ☐ Insurance
- ☐ Negotiable instrument
- ☐ Other (specify): _____

Real Property

- ☐ Quiet Title
- ☐ Condemnation/Eminent Domain
- ☐ Foreclosure
- ☐ Specific Performance

Other

- ☐ Declaratory Judgment/Injunctive Relief
- ☐ Intellectual property
- ☐ Derivative Shareholder suit
- ☐ Securities

- ☐ Elder Abuse
- ☐ Interpleader (ORCP 31)
- ☐ Other (specify): _____

CIVIL CASE MANAGEMENT SHEET
(see SLR 2.011 for required use)

PARTIES (list overflow on separate sheets): Plaintiffs: _____ _____ _____	Case no.:	Pleading has Class Action Allegations: No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Defendants: _____ _____ _____
GREG M REYNOLDS		CARDON OUTREACH

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<input type="checkbox"/> Wrongful Death
<input type="checkbox"/> Negligence
<input type="checkbox"/> Professional negligence medical
<input type="checkbox"/> Professional negligence (legal, other)
<input type="checkbox"/> Defamation
<input checked="" type="checkbox"/> Fraud
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<input type="checkbox"/> Employer liability (ELL)
<input type="checkbox"/> Employment discrimination/wrongful discharge
<input type="checkbox"/> Wage and hour
<input type="checkbox"/> Employment contract
<input type="checkbox"/> Other (specify): _____ |
|---|--|

Contract (other than employment)

- ☐ Money Action (consumer credit)
☐ Insurance
☐ Negotiable instrument
☐ Other (specify): _____

Real Property

- ☐ Quiet Title
☐ Condemnation/Eminent Domain
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☐ Specific Performance

Other

- ☐ Declaratory Judgment/Injunctive Relief
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☐ Derivative Shareholder suit
☐ Securities

- ☐ Elder Abuse
☐ Interpleader (ORCP 31)
☐ Other (specify): _____

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Case no.:

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- ☐ Professional negligence medical
- ☐ Professional negligence (legal, other)
- ☐ Defamation
- ☐ Fraud
- ☐ Intentional injury to property (including nuisance and trespass)

- ☒ Intentional personal injury (including assault, battery, false arrest, intentional infliction of emotional distress)
- ☐ Employer liability (ELL)
- ☐ Employment discrimination/wrongful discharge
- ☐ Wage and hour
- ☐ Employment contract
- ☐ Other (specify): _____

Contract (other than employment)

- ☐ Money Action (consumer credit)
- ☐ Insurance
- ☐ Negotiable instrument
- ☐ Other (specify): _____

Real Property

- ☐ Quiet Title
- ☐ Condemnation/Eminent Domain
- ☐ Foreclosure
- ☐ Specific Performance

Other

- ☐ Declaratory Judgment/Injunctive Relief
- ☐ Intellectual property
- ☐ Derivative Shareholder suit
- ☐ Securities

- ☐ Elder Abuse
- ☐ Interpleader (ORCP 31)
- ☐ Other (specify): _____

CIVIL CASE MANAGEMENT SHEET
(see SLR 2.011 for required use)

PARTIES (list overflow on separate sheets):	Case no.:
Plaintiffs:	Pleading has Class Action Allegations: No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
Defendants:	
GREG M REYNOLDS	CARDON OUTREACH

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- ☐ Fraud
- ☐ Intentional injury to property (including nuisance and trespass)

- ☐ Intentional personal injury (including assault, battery, false arrest, intentional infliction of emotional distress)
- ☐ Employer liability (ELL)
- ☐ Employment discrimination/wrongful discharge
- ☐ Wage and hour
- ☐ Employment contract
- ☒ Other (specify): Civil Rights Violations

Contract (other than employment)

- ☐ Money Action (consumer credit)
- ☐ Insurance
- ☐ Negotiable instrument
- ☐ Other (specify): _____

Real Property

- ☐ Quiet Title
- ☐ Condemnation/Eminent Domain
- ☐ Foreclosure
- ☐ Specific Performance

Other

- ☐ Declaratory Judgment/Injunctive Relief
- ☐ Intellectual property
- ☐ Derivative Shareholder suit
- ☐ Securities

- ☐ Elder Abuse
- ☐ Interpleader (ORCP 31)
- ☐ Other (specify): _____

Can confirm & ^{for} AFFIRM the Constitution of the US
State & Federal Laws have deemed to not apply
use of any means necessary including use of
deadly force approved by:

PSU

PPB

Mult Co Sheriff

FBI

Secret Service

Dept of Homeland Security

Cheryl M. Bader for Oregon Dept of Justice

Kristen Bader for Mult Co DA's office

PSU BOARD of Trustees

KOIN NEWS

Washington Post

Governor Kathy Labeer

Office of the President of the US

Every member of the US Senate

Every Governor in the US

US Dept of Justice

Senator Ron Wyden

Rep Earl Blumenauer, Case 00-

Senator Jeff Merkley

OREGON Public Relations office, Nancy Cozine

Disability Rights OREGON

OREGON Appellate Court Clerk

" Supreme "

Portland Adventist Medical Center

Dr. Lynn Penny-Rose

for the judge

1) NEVER read a response from SSA except
- subpoena
- Enlist link to letter
- Can't figure out how to get him's Pass
the 1000's of emails

2) CARDON outreach
- subpoena
- NEVER A Reply except to term
- unknown, what was done/not done

3) PSU -
- all Faculty noted
- all on Student Committee
- NANCY Conyne
- Mult Co. Sheriff
- DMV
- ODR
- SSA
- Senator Wyden
- campus pub sale

4) SSA -
- FBI
- Sec. State
- Mult Co
- DoJ Home Sec
- Courts
- HOS
- PSU
- Campus Pub Sale
- Senator Wyden

11 years

In Response to 9th Circuit

As per your letter dated ~~_____~~ I ~~did~~
send a request to US District in Portland
OR. To date that request has gone
~~ignored~~, so I am appealing to your
court yet again.

On 11-1-~~_____~~ Kyle C. Velum denied me
my Const. & State right to adequate
legal representation on the charges of
later that month I was

to appear in Tan County for a meeting
D. Michael Pugh re: the case at which
time I was escorted to left of the
main Kuyse into a cold dark conference
room where the first plea was offered in
exchange for performing certain sexual
favors for Mr. Pugh. Having not been in
trouble with the law before and no legal
representation, I was forced to my knees
and ordered to suck his dick. It was a
horrible experience that haunts me to this
day. I still hear his voice & still feel
his hands shaking my head while he
~~also~~ assured me I was doing the right
thing, and that it would all be over soon.
Shortly thereafter I had to swallow his
ejaculation and return to my room to

✓ Count 1 = Intentional Pers Injury, false arrest, intentional infliction of emotional stress.

✓ C22 Rights under 18, 241 sect →

✓ C3 - Violating my Cml rights

- Mention Photo graphs search, No Reports etc
None Got made to
Done by Police.
every user at
8 times
+ Rules
+ FBI
+ Photo
evidence

✓ C4 - HIPAA violations

→ Use of US Office of US Civil Rights

120970073

+ CPSO et al :
+ Burgess office
+ Collection agency

✓ C5 - Defamation

Lisa Lam, Thomas, TOPPE
Thomas CE = Post Negligence

→ Put Vanguard also in there

→ replaced →

✓ - Declaratory relief + Judgment NOT for K. Burns,

MS & Amr can
be put on the
damages ongoing
any will have to determine
the price of my
dignity and the
value of my
rights
at the reality of
our Education
system & state

Allegations

of our
union
as far as
corruption
in political
parties

S. Langer
J. Ross
C. Hart

K. Burns

Cisa Lam

Dom. Tomas

Michelle Toppe

LI, DL, MT, KB, CH, JR, SL

LI, DL, MT, KB, CH, JR, SL

LI, DL, MT, KB, CH, JR, SL

LI, DL, MT, KB, CH, JR, SL

LI, DL, MT, JB

LI, DL, MT, JB

LI KB, CH, JR, SL

Intentional Personal Injury

Title 18 USC Sect 241

Civil Rights Violations

HEPPA violations

Professional Negligence

Declaratory / Judgment Relief

Defamation

What
Saw it

N. Morris same as CH

Perla Pinto II

CPSO - Criminal Activity: Rosemary H II

Orlaue Balger = 1, 2, 3, 4, 5, 6,

Oregon etc -- Prot neg < Petra, money action

Reck, Relet, Intell property

Intentional, Civil Rights

→ Task forces on Campus Pub Safety

Submitting an Ethics Complaint Regarding an Oregon Lawyer

Here is a copy of the information that you have submitted. A copy has been sent to the email address you provided:

Oregon State Bar

1/25/2014 8:21:39 AM

To: Greg Reynolds

Following is a record of your complaint filed with the Oregon State Bar.
Please retain this for your records.

Name and Address of COMPLAINANT

Mr Greg Reynolds
PO Box 333
Corbett, OR 97019
Primary Phone: 503-358-4827
Secondary Phone:
Email: reynoldsvs.PSU@gmail.com

Name and Address of ATTORNEY

Mr Dennis Michael Puch OSB 85308

Eugene, OR
Primary Phone:
Secondary Phone:

COMPLAINT

20 years ago I denied my right to legal counsel when Lane County had no evidence. I was taken into a conference room my Dennis and told if I accepted the plea I would have no jail time, 80 fee, community service and I could get it expunged in 10 years and go on with my life. The entire time his dick was in my mouth, he was stoking the back of my head assuring me, "its ok son" "you're doing the right thing boy" "its all gonna be better now". Well its not. Nancy Cozine, Governor Kitzhaber know, 2 Oregon Senators and I was expelled from PSU over it. I asked you guys to help me with an attorney day before yesterday and all you did was send out the Multnomah County Sheriffs office. Did you know the court already has the evidence of the Sheriffs department and PSU criminal activity? And now you are a witness. The cops keep coming to my home without warrants. I have been tired and convicted already of things I have not done never seen a day in court. At what point can I shoot these people for violating my rights, get protection from the courts, or aid from you? No threat there, but a very serious question. I already left a message for Judge Nan Waller about the police and your connection to trying to ensure this case doesnt see a court room. Are you guys also trying to tamper with a civil rights case? My supporting documents are all on line, available to the public if you just google civil rights for Greg Reynolds, or you can contact the Smell Cunt Whore at Portland State University for all of the latest information or contact Judge Nan Waller, or Nancy Cozine at the Oregon Public Defenders office. See you in court, one way or the other.

ATTACHMENTS

Oregon State Bar | 16037 SW Upper Boones Ferry Road | Tigard, Oregon 97224

August 22, 2002

PO Box 261
Portland, OR 97207-0261

Honorable John A. Kitzhaber
Governor of Oregon
State Capital
Salem, OR 97310

RE: Application for Executive Clemency Dated April 2002

Mr. Kitzhaber:

In my search for an attorney to handle my expungement, as requested by your office, I have run into several attorneys who feel that expungement proceedings should not be necessary as my constitutional rights were violated by the presiding judge in the case, and that I should pursue legal representation and the advice of the American Civil Liberties Union for further consideration if I am denied for another pardon in this extraordinary situation.

When I was charged in 1994, I was denied legal counsel as guaranteed by the constitution. Being an adult over the age of 18 with only a part time income I could not afford adequate counsel and my parents were no longer responsible for my legal defense. As a result I was unable to secure adequate legal counsel. In addition to this the prosecutor took advantage of that situation by charging me with a felony he did not have the evidence to support, as supported by the terms of the plea agreement which was incredibly lenient for the charges on the indictment. This is also supported by being cited on the night of the offence for, four misdemeanors, and then being charged for a felony on a first offence. The attorney who took my initial consultation assures me that any attorney who know what he was doing could have seen me acquitted or the charges reduced to a misdemeanor considering that there was no marijuana seized at the scene of the incident. I was a victim of a grave injustice and a prosecutor who took advantage of a young adult who was scared and denied legal representation.

This is an extraordinary situation that should have never come across your desk, as it should not have happened. I have learned a great deal since this occurred, both about the dangers of drugs and who the enemy really is. The police and the state. These people bend rules to suit their needs and hang innocent people in their own self serving interests. It is my intent that if this not pardoned, as it should be, to seek the advice of as many attorneys' as we can afford in the upcoming years, the advice of judicial review, if it exists in the state, and the American Civil Liberties Union. This was a gross violation of

REYNOLDS00000433

August 10, 2004

35612 SE MacInnes Rd
Corbett, OR 97019

US Commission on Civil Rights
Criminal Section, PHB
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Cc: Oregon Bar, US Dept of Justice, US District Court of Appeals, Washington Post,
FBI, Washington.

For ten years I have been fighting the State of Oregon's political and moral bankruptcy. I have endured persecution and more recently threats of a terrorist nature directly from the courts of this state. Reported to the FBI, and reply is attached. This is a result of my fight against injustice and the violations of my civil rights repeatedly over the last 10 years. Attached is documented proof that the corruption and criminal behavior is out of control at even the highest levels of Oregon's government. It includes the Governor, former Governor, and both Senators as well as the Oregon Attorney General. There must be a conspiracy, as these officials have discussed my case and the procedural, criminal, and civil rights violations remain suppressed. Former Governor Kitzhaber's legal representative, Sean Odet, even went so far as to contact my former employer, Terri Trout and others investigating my applications for clemency. During this investigation, there is no way he could have overlooked the denial of my 5th Amendment civil rights by the Lane County elected criminals. This is why copies of this formal complaint will be served on the Oregon Bar Association, the press, the FBI, and other government officials responsible for protecting me from the actions of these criminals. Who protects citizens from the government? Out of fear for my life, I must also apply for refugee status and begin making plans to leave the country. This is causing great mental stress on my family, as they have also suffered cruel and unusual punishment over the last 10 years.

I am currently unable to work due to the mental, and now physical health issues, directly related to the cruel and unusual punishment I have endured over the last 10 years. High blood pressure, post traumatic stress disorder, ulcers, and the list continues to grow every day. All this is documented in medical records with the source of the health issues being traced back to the abuses of power and criminal acts against me by the State, about 10 years ago. In a recent hospital visit, in violation of federal laws, (the law is clearly posted on the US Commission on Civil Rights web page) I was threatened by the Multnomah County Investigator, Larry Smith. These threats were against my personal freedoms and civil rights, including the right to be free from persecution. Mr. Smith attempted to extort payment for the hospital in addition to his terrorist threats. I have discussed the situation with several attorneys', and since Multnomah County held me against my will, they are responsible for payment to the hospital, or it can be deducted from the punitive damage award I most definitely am entitled to. As a result I have had to take personal security measures to ensure my safety and protection from this individual,

REYNOLDS00000434

and in fact the State of Oregon. Ten (10) years ago I was dragged into court on a delivery and manufacture charge of marijuana. I was denied my Constitutional right to an attorney, to spite being on the Department of Agriculture's food assistance program at the time. My family was forced to hire the only attorney we could afford, who just happened not to possess the skills necessary for a legally adequate defense. (Yet another violation of rights protected by the State) The judge in the case was, and is fully aware of the violations, as well as the Oregon Appellate Court, the Oregon Supreme Court, both Senators Wyden and Smith, the Oregon Attorney General, and of course the Governor himself including former Governor Kitzhaber who only pardons sex-offenders. Is that my mistake? I didn't mess with children. Who's the sick bastard in this case?

Below and attached are the law violations the State of Oregon has up-held in a discriminatory manner against myself. It is my sincere hope that these criminals do the innocent public a favor, put the gun in your mouth and pull the trigger! The 5th Amendment to the Constitution of the United States, which states legal counsel, will be appointed for those who cannot afford it was the first, and should have been, fatal blow the state's case. There are records kept by the State of Oregon to verify this, unless in an effort to suppress the truth they were destroyed. This procedural violation should have been enough to warrant a dismissal under the law, however, without adequate legal representation, by an attorney with the skills necessary for this level of defense, I only received advice, that every attorney I have talked to since should get the attorney disbarred!

Oregon law requires that the statements made on the application for legal counsel be reviewed for accuracy. Had this been done, there will be a copy of a statement from the Adult and Family Services Division showing that I was in fact below the federal poverty level and on public assistance; therefore entitled to legal representation. Further, I was working part time for Truax Company as a gas station attendant, this verification should, by law, also be in the judges (state's) file. Proving further that he "knowingly" denied me my civil rights protected by law in order to gain a conviction. I have filed a complaint with Oregon Board of Judicial Fitness on this matter already, and notified the Oregon Bar Association of his unethical behavior.

Oregon law further allows for relief by the appellate and supreme courts when a colorful claim of violations is proven. The proof is in their own records. Explanations and outlines of the civil rights, procedural violations, and criminal acts to follow:

On 12 January 1994, to spite being on public assistance and entitled to legal representation, I was denied legal representation. All other acts beyond this point are actually irrelevant as they are "fruit of the poisonous tree", the charges should have been overturned, or thrown out at this point for the civil rights abuses. However, I have researched and found many other laws violated after the most serious of the violations, being denied my Constitutionally guaranteed legal counsel.

ORS 138.530 requires that relief MUST be granted due to:

- a) The denial of constitutionally guaranteed rights under the 5th amendment of the Constitution.

- b) The already illegal sentence is excessive, considering the mental and physical damage caused to my family, and myself as a result of these illegal, and unethical actions.

ORS138.480 requires the Appellate court to provide public defense services because I have been, "deprived of liberty by a judgment". Documented proof of their unethical behavior is attached.

The appellate and supreme courts of Oregon have shirked their responsibility and obligation stating, "that they have no jurisdiction". I have found and pointed out to them several times where their jurisdiction lies.

ORS138.505 & 138.040 allow for an appeal on plea should, "a colorable claim of error be proven". Denying someone their 5th amendment right to legal representation is the most serious crime against people's civil rights possible. The law further requires the court to hear the case when, as in this case, the sentence exceeds the maximum allowable by law. With no marijuana seized, they had no case, and after the denial of legal counsel, it is irrelevant since the entire conviction is illegal and in violation of my civil rights. It is further required that they review the case when the sentence is, "unconstitutionally cruel and unusual." Documented proof that the courts are fully aware, again are attached.

ORS138.261 removes the appeal time limits in the case, a second time in addition to above mentioned statutes. It removes the time limit based on the grave miscarriage of justice imposed on myself through the criminal denial of my 5th amendment civil right to have adequate legal counsel.

This barely scratches the surface, but they allow for a new trial based on the criminal acts which have brought us to this point. However, no new trial is required, as my civil rights were violated and we now in the financial compensation stage. The conviction, in all of its illegality must be overturned, and removed from my record immediately as it is NOT a legal conviction. It is not OK, for the Governors, Senators, ect. to deny citizens their rights, that makes them terrorists, and they know it. These people who allow this behavior to continue are a bigger threat to the American way of life than Al Qata!

Back to the core issue, being denied legal representation.

ORS151.485 promises legal representation to those, "financially unable to retain adequate (to be defined later) legal counsel with substantial hardship in providing basic economic necessities to the person or the persons dependent family".

Facts:

- 1) There were no dependents
- 2) I was of legal age, and my family was not responsible for my legal defense
- 3) I was working part time or less for minimum wage, and was on federal food stamp assistance
- 4) I was living in a single family home with 2 other families at the time, because none of us could provide "basic economic necessities".

ORS151.491 states that an authorized designee will make a good faith attempt to verify the statements made on the application. I believe this law was violated knowingly to deny me my right to a fair and impartial trial, as well as adequate


legal representation. This was attempt to "coerce with fear and criminal behavior, a denial to counsel", as required by law to gain the desired result, an illegal conviction which they had no evidence to prove.

Since the conviction I have endured persecution at every level of government, lost jobs, attempted suicide, and appealed to the Governor to allow me to use Oregon's Death with Dignity act to prevent me and my family any further cruel and unusual punishment. No reply was ever received, but is it not my right to die? Haven't I suffered enough at the hands of these morally bankrupt criminal terrorists? I have been raped by the system, but as bed partners they are protecting each other, not the citizens rights to a fair trail including the right to adequate legal representation. Did you know, they seized NO marijuana at all, and I am a felon? In fact, I now have a prescription for Marijuana to help me cope with the mental and physical illnesses brought on by years of cruel, unusual, and illegal persecution.

During Kitzhaber's administration, his chief legal counsel investigated, and also spoke with my employer at the time about the situation, led her to believe that I would be getting a pardon so I could take the position at US Bancorp. This did not happen, as Kitzhaber only pardons men who rape little boys, so they can come back to Oregon and repeat the deed. I offered to become a child molester if it would help me to regain my life. His legal counsel was Sean Odet, 503 378 3072 and the conversations took place around 2.28.02. Terri Trout can be reached at 503.730.5361.

This is a matter of most serious nature. Terrorists are in own government. This case demands a full civil rights investigation immediately.

Thank you for you attention to this matter.



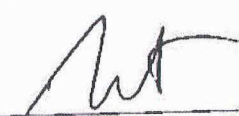
Greg M. Reynolds

02/17/2003

Seen with marked depression and anxiety. He relates a tango with the law 10 years ago that resulted in him being convicted of a felony. This is an event that today would hold only misdemeanor charges. This event has dogged him for the last 10 years and prevented him from getting good jobs. Most recently he was denied a scholarship to school because he cannot instruct on a college level because of the felony conviction. He has become increasingly anxious and depressed. About a year ago attempted suicide and was briefly hospitalized at Good Samaritan. About five days ago he became quite drunk and laid down in the middle of a highway. He was taken to Hooper Detox and released the following morning. He has tried to make contact with Multnomah County Mental Health Services, and they have requested that he have a medical evaluation first. He has been holed up in his house ever since. He does not feel much like going out. He has not been drinking any. States that he sort of lost the taste for it after getting so drunk a few days ago. He has no immediate suicidal plans or thoughts following that. He is not able to attend school and needs a letter so that he can withdraw passing rather than taking failing grades, and therefore saving his grade point. He has a sensation of tightness in his chest. He is not sleeping. He feels very blue.

Long review with him about all of these factors. He presents as a bright and articulate gentleman who is having a hard time processing what seems intrinsically unfair and something that has followed him for years. I cannot comment about any underlying personality issues.

At this time I volunteered to write a note that he is ill and unable to attend school to save his grade point. Will give Xanax 0.5 mg #25 to take 1/2 to one t.i.d. after he agrees not to drink any alcohol. Also to start on Lexapro 10 mg q.d. Samples are provided for six weeks, with again an agreement of any suicidal thoughts he will call. He will have to get into the Multnomah County health system, as he has no insurance. OMAP asked him to call back later given the cut backs in that program. I am not optimistic, however. He does agree to return in two weeks and to call in the meantime if disaster strikes.


J. Mark Morton, MD Internal Medicine
THE PORTLAND CLINIC

JMM:MEDQ/m
79411 2-4/
D: 02/17/2003
T: 02/17/2003

REYNOLDS, GREG

51-30-18-2

Page 1

REYNOLDS00000438

-->Greg<---

From: tips3@fbi.gov
Sent: Saturday, August 07, 2004 02:09
To: gregttd@comcast.net
Subject: FBI RESPONSE

Dear Mr. Reynolds ,

THIS IS NOT AN AUTOMATED RESPONSE

Thank you for your submission to the FBI Internet Tip Line. After a careful evaluation of your information, it is our determination that your complaint should be reported to your local law enforcement or District Attorney's office.

For your information, the Internet Tip Line was created on 9/11/01, in response to the terrorist attacks upon America. We quickly established a mechanism for the public to submit information to the FBI via the Internet. Our operation is completely automated and paperless. Submitted tips are received immediately, reviewed within minutes and prioritized by trained Professional Support personnel, and Agents set action leads within the hour, as appropriate.

We encourage you to share this information with your family, friends, and co-workers, and encourage them to not hesitate to submit information they may deem of interest to the FBI.

IMPORTANT - NOTE THE FOLLOWING:

The FBI does not maintain an email address to submit information or attachments to directly; therefore, please do not reply directly to this message via your email client. The FBI maintains an automated system that is designed to track all information received, to ensure that all tips are addressed in a timely and efficient manner. Therefore, please visit the FBI.GOV Web site again should you have occasion to submit additional information. We WILL NOT open or respond to "reply" email.

*I did report Mr. Larry Smith's threats
(Platteau County Court Investigator)
to the FBI.*

THEODORE R. KULONGOSKI
GOVERNOR



July 28, 2003

Mr. Greg Michael Reynolds
35612 SE MacInnes Road
Corbett OR 97019-9657

Dear Mr. Reynolds:

I have received and reviewed your application for a pardon.

The power to grant executive clemency is a responsibility that I take very seriously. I believe that a Governor's clemency power should be exercised sparingly. The separation of powers inherent in our system of government and respect for the workings of the judicial system require that the Governor's clemency power be used in only the most extraordinary of circumstances.

I have considered carefully whether your application for pardon should be granted. Under the circumstances, I have concluded that a pardon is not warranted. I am therefore denying your application.

Sincerely,

THEODORE R. KULONGOSKI
Governor

TRK/DCR/lmh

Certified to be a true and correct
copy of original filed in the
Dated AUG 15 2014
Mary L. Moran, Clerk of Court
US District Court of Oregon
By Deputy Clerk M. KENN
Pages 1 Through 4

UNITED STATES DISTRICT COURT

for the
DISTRICT OF OREGON

Portland Division

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Case No.

'14-MC-301-A

The person of Greg Michael Reynolds, white male,
date of birth 08/18/1973

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the _____ District of _____ Oregon

(identify the person or describe the property to be searched and give its location):

The person of Greg Michael Reynolds, white male, date of birth 08/17/1973, more fully described in Attachment A,
which is attached hereto and incorporated herein by this reference.

The person or property to be searched, described above, is believed to conceal (identify the person or describe the
property to be seized):

The information and items set forth in Attachment B which is attached hereto and incorporated herein by this reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or
property.

YOU ARE COMMANDED to execute this warrant on or before

August 14, 2014
(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10 p.m. ☐ at any time in the day or night as I find reasonable cause has been
established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an
inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge

duty magistrate judge
(name)

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay
of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be
searched or seized (check the appropriate box) ☐ for _____ days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____

Date and time issued:

July 31, 2014
@ 3:52pm.

[Signature]
Judge's signature

City and state: Portland, Oregon

John V. Acosta, U.S. Magistrate Judge
Printed name and title

REYNOLDS00000441

Return

Case No.:

2660-PD-5300220

Date and time warrant executed:

Aug 15, 2014 0830

Copy of warrant and inventory left with:

Cody M. Ruschel

Inventory made in the presence of:

John Sorenson

Inventory of the property taken and name of any person(s) seized:

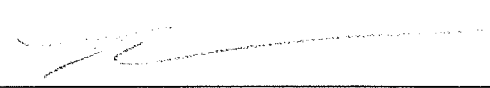
No items taken.

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Aug 15, 2014

Date


 Executing officer's signature

SA Peter Summers

Printed name and title

Subscribed, sworn to, and returned before me this date.

8/15/2014

Date


 Judge's signature

REYNOLDS00000442

ATTACHMENT A

PLACE TO BE SEARCHED

SUBJECT 1- The person of Greg Michael Reynolds, white male, date of birth 08/17/1973

SUBJECT PREMISES 1 – located at 35612 SE Macinnes Road, Corbett Oregon, 97019, and is the residence of Greg Michael Reynolds.

Appears to be a single-floor home, which abuts a small hill. The residence is located at the end of a declined driveway, and has a brown exterior. Maroon canopies provide sun covering over the main entry door, and some of the windows facing the driveway. The front door is reached by stairs which lead from the driveway area to what appears to be a wooden deck.

SUBJECT VEHICLE 1 - a 2004 Ford Ranger, Oregon license plate number CA21276, and vehicle identifications number 1FTZR45E85PA21069. Located at SUBJECT PREMISES 1.

SUBJECT VEHICLE 2 – a 2002 Chevy Astro van, Oregon license plate number K7ZZY, and vehicle identification number 1GNEL19XX2B122592. Located at SUBJECT PREMISES 1.



REYNOLDS00000443

ATTACHMENT B

Items to be Searched For, Seized, and Examined

The following records, documents, and items that constitute evidence, contraband, fruits and/or instrumentalities of violation of 18 USC § 875 (c), Interstate communications.

- a) Documents to include notices, bills, letters, and written communications ;
- b) Any handgun or firearm ammunition, written documents relating to firearms, cleaning kits, holsters, targets, spent cartridges, gun cases or safes;
- c) Cellular telephones to include smart phones;
- d) Computers, laptops, and electronic media storage devices;
- e) Usernames or passwords pertaining to computer access, electronic mail accounts greynolds@portlandstate.org, greynolds73@gmail.com, reynoldsvs.psu@gmail.com, and cellular telephones related thereto.
- f) Contact lists or documents associated with Portland State University.

Certified to be a true and correct
copy of original filed in this District.

Dated 7-31-14
Mary L. Moran, Clerk of Court
District Court of Oregon
By Deputy Clerk [Signature]
Pages 1 Through 2

UNITED STATES DISTRICT COURT

for the
District of Oregon

FILED 31 JUL '14 16:08 USDC-ORP

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

The person of Greg Michael Reynolds, white male,
date of birth 08/18/1973

Case No. '14-MC-301-A

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The person of Greg Michael Reynolds, white male, date of birth 08/17/1973, more fully described in Attachment A, which is attached hereto and incorporated herein by this reference.

located in the _____ District of _____ Oregon _____, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18 U.S.C 875 (c)	Interstate Communication

The application is based on these facts:
See affidavit which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Special Agent Peter Summers

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 31, 2014

City and state: Portland, Oregon

Judge's signature

John V. Acosta, United States Magistrate Judge

Printed name and title

REYNOLDS00000445

5. This affidavit is made in support of a search warrant for the premises, including the dwelling, outbuildings, curtilage, and vehicles thereon, located at 35612 SE Macinnes Road, Corbett, Oregon 97019, as well as the person and vehicles of Greg Michael Reynolds. This warrant is being sought in connection with an investigation relating to violation of federal laws governing interstate communications by Greg Michael Reynolds in the Judicial District of Oregon.

HISTORY OF SUBJECTS INVOLVED

6. Greg Michael Reynolds, date of birth 08/17/1973, is a convicted felon. I have reviewed documents showing that Greg Michael Reynolds was convicted of the following felony, punishable by more than one year in prison:

- Delivery of Controlled substance (Schedule I) to a Minor, in violation of Ore.Rev.Stat. § 475.995, on or about February 15, 1994, in Jackson County, Circuit Court, case number 1093110439.

It appears that, pursuant to Ore.Rev.Stat. § 166.270(4)(a) and the age of the conviction, Reynolds may legally possess firearms in Oregon.

7. Oregon Department of Motor Vehicles records show that Greg Michael Reynolds has an Oregon State Driver's License, number 4836765, listing 35612 SE Macinnes Rd, Corbett, Oregon, as his current residence. Moreover, I have attempted to interview REYNOLDS once at the address 35612 SE Macinnes Rd, Corbett, Oregon, most recently on July 24, 2014. My partner Special Agent Jake Green had previously interviewed REYNOLDS. Both times REYNOLDS was present at the address. During both visits it was evident REYNOLDS resided at the address.

RELEVANT FACTS

8. The following information, facts, and occurrences are the result of my personal knowledge and investigation, my conversations with other law enforcement officers, and from my review of their reports relative to this investigation.

9. On April 9, 2014, Cody Michael Kuschel was interviewed. KUSCHEL stated he has been in an intimate relationship with REYNOLDS for three years. The two of them live together at REYNOLDS' residence located at 3516 SE Macinnes Rd, Corbett, Oregon. KUSCHEL stated that REYNOLDS told him that there is a Glock firearm in the house (aforementioned address in Corbett) and that the firearm is locked in a key/combination lock box. Kuschel stated he never personally saw the Glock in the house but was told by REYNOLDS where it was kept.

10. On July 21, 2014, at approximately 6:33 a.m. an email was sent from **reynoldsvs.psu@gmail.com** to balzerj@pdx.edu, an email account assigned to Jackie Balzer, the former Vice President for Enrollment Management & Student Affairs at Portland State University. The email was also sent to specific employees of Portland State University, news organizations, and others. The verbatim email content is as follows (with misspellings in original):

Dear Jackie:

Now that you have violated my constitutional and civil rights and the Multnomah County DA's office, the US Department of Education, Governor John Kitzhabers office, the entire US Senate and the entire PSU Board of Trustees have authorized me to shoot you with a Glock 17 9mm are you prepared to accept your fate as you have without due

process have forced to me accept mine? I have done nothing to anyone that PSU did not, in violation of the law do to me first. I am simply upholding PSU's Code of Conduct.

I am prepared deliver your sentence as also accepted by the Circuit Courts of the State of Oregon, Multnomah County.

Have a nice day. I look forward to seeing you soon.

Greg Reynolds

11. On July 18, 2014, at approximately 6:50 a.m., an email was sent from both **reynolds@portlandstate.org** and **greynolds73@gmail.com** (known email addresses used repeatedly by Greg Michael Reynolds) to **nancy.cozine@opds.state.or.us**, an email account assigned to Nancy Cozine, the Executive Director for the Oregon State Public Defender's office. The email was also sent to specific employees of Portland State University, news organizations, and others. The verbatim email content is as follows (with misspellings in original):

Dear Nancy Cozine and the Oregon Public Defenders Office:

Now that you are a witness to the fact the the laws of this nation and the Constitution do no apply to me, you must understand that in lieu of due process Portland State University has determined I am "permenently and irreversibly" expelled from all rights and obligations under all state and federal laws. This has been confirmed along with my right to shoot those in the face with a Glok 17 9mm for violating my rights and denial of due process. This may include you per the Portland State University record and all board of trustees members, our great dictator Osama Bin Kitzhaber, the Oregon Department of Justice (Chrystal M. Bader), the US Department of Education, the Multnomah County DA's office (Kristen Snowden), the Oregon Appellate Clerks office, each and every

member of the US Senate, the Office of the President, Multnomah County Sheriff Dan Stanton, the ACLU Oregon, Project Respond, Disability Rights Oregon Gregory Kaufory, Dominic Thomas, Michelle Toppe and Earl Blumenauer.

In lieu of due process I have been authorized to take further actions as necessary.

Sincerely

Greg M. Reynolds

12. On July 23, 2014, at approximately 7:55 a.m., an email was sent from **reynolds@portlandstate.org** and **greynolds73@gmail.com** to an account assigned to Dominic Thomas, Director of Student Conduct, and an email account assigned to Michelle Toppe, Dean of Student Life, both at Portland State University. The email was also sent to specific employees of Portland State University, news organizations, and others. The email content is as follows (with misspellings in original):

Date: Wed, 23 Jul 2014 07:55:22 -0700

Subject:

Dear Dominic Thomas and Michelle Toppe:

Since I have been authorized by the US Senate, Governor, Board of Trustees, Multnomah County DA (Kristen Snowden), and the Oregon Department of Justice (Chrystal M. Bader) to shoot you with a Glock 17 9mm for violating my Constitutional and Civil Rights, you should ask yourselves, are prepared to die today?

In the name of Jesus, Justice and the PSU Code of Conduct. Amen.

Sincerely

Greg M. Reynolds

13. On June 9, 2014, at approximately 6:08 a.m., an email was sent from **reynoldsvs.psu@gmail.com** to **whittenc@pdx.edu**, an email account assigned to Craig Whitten, a Lieutenant with Portland State University Security. The email was also sent to other people at Portland State University, government and law enforcement organizations. The email verbatim content is as follows :

Dear Craig Whitten, Craig Baker and Chief of Campus Public Safety:

I was tried and convicted by your department. You have violated my constitutional and civil rights without question. As of today that changes forever. As ordered by Jackie Balzer and PSU and has been universally accepted as law by each and every member of the US Senate, the office of the President of the United States, the PSU Board of Trustees, Jim Fransceoni, Commissioner Kaufry, Gregory Kafury, Governor John Kitzhaber, the Oregon Attorney Generals office, the Multnomah County Sheriff's office, the Circuit Courts of the State of Oregon cases 120970073, 140201438, the Social Security Administration, the US Department of Justice, the FBI, Disability Rights Oregon, Congressman Blumenauer case 00504061-74463, Oregon BAR TWJ1400136, as well on the approval of Kristen Snowden Multnomah County DA's office and Chrystal M. Bader with the Oregon Department of Justice hereby affirm that the law does not apply to Greg Reynolds, you are allowed to entrap people and impersonate police officers without consequence and I am fully authorized by the courts as of 15 May 2014, to shoot you in the face with a Glock 17 9mm in defense of the rights your criminal activities have denied me. I have yet to see a day in court as guaranteed by Senator Wyden, but you criminals run free. I intend to defend myself by any means necessary in lieu of application of the law.

This is war.

Sincerely

Greg M. Reynolds

14. Based on the threatening verbage and explicit threats, I have probable cause to believe REYNOLDS has violated 18 U.S.C § 875(c). I know from personal experience and research that email servers, particularly gmail, are located outside the State of Oregon and that email transmissions within Oregon necessarily travel outside the state. On July 24, 2014, writer and Special Agent Jake Green attempted to interview REYNOLDS at his home located at 35612 SE Macinnes Rd, Corbett, Oregon 97019. REYNOLDS declined to be interviewed. About 10 to 15 minutes after writer departed the residence, an email was sent via reynolds@portlandstate.org to numerous persons, many of whom have received threats from Reynolds, specifically Dominic Thomas and Michelle Toppe. The verbatim email content is as follows:

Dear Dominic and Michelle:

The FBI was just here. They tore up my driveway on video as they were leaving because they once again came here without a warrant. You have violated my constitutional and civil rights, the most you can do is lick my pussy. Kind of like how you treated me when you broke the law.

Sincerely

Greg M. Reynolds

Record of this visit was also record by 911 phone call to report the threats made to me at my residence without due process or warrants.

15. On July 30, 2014, writer spoke with Chief of Public Safety at Portland State University (PSU) Phillip Zerzan, who stated, in addition to being expelled, Reynolds was barred for two years from PSU property prior to the emails quoted in this affidavit.

16. On July 29, 2014, a federal grand jury in this District returned a sealed indictment charging REYNOLDS with two counts of interstate threatening communications, in violation of 18 U.S.C. § 875(c), regarding two of the aforementioned threats to Portland State University employees.

17. Based on emails from REYNOLDS claiming to have access to a firearm, specifically a Glock 17, and a named associate stating REYNOLDS claims to have a Glock firearm in his home, I have probable cause to believe Greg Michael Reynolds is in possession of a firearm.

18. Based on my training and experience, I know that firearms and firearms accessories are valuable commodities and are kept for long periods of time. I know from training and experience that it is common practice among persons who possess firearms either legally or illegally for them to secrete the firearms and firearms accessories upon their person, upon the persons of co-conspirators, within their vehicles, within their residence, and within the boundaries of the curtilage of their residences. Secreting of the firearms and firearms accessories outside the residence, but within the boundaries of the residential curtilage, and within their vehicles, is a practice of persons who possess firearms, and is an attempt on their part to prevent the firearms and firearms accessories from being stolen by persons in the criminal community, and to prevent their firearms and firearms accessories from being discovered by law enforcement in the event of the service of a search warrant. I also know from training and experience that it is

common practice among persons who possess firearms, to have several firearms in their possession, and to collect firearms, due to their value.

19. Based on my training and experience, I know that people who have firearms have other various components related to firearms, such as cleaning kits, spare parts for firearms, holsters, ammunition, magazines and other ammunition storage devices, bullets, shell casings, primers, powders, reloading equipment, firearm boxes/cases, lockboxes, trigger locks, scopes, laser sights and other gun-related optics, receipts, memoranda and/or notes pertaining to the acquisition, receipt, purchase, repair or disposition of firearms, books, diagrams, manuals, photographs both in print and on digital media, undeveloped film and videos, and gun safes. These items can be stored on their person, in their vehicle or a vehicle that they are driving, and/or in their residence, outbuildings and curtilage.

20. Based on my training and experience, I know as a law enforcement officer that, during the course of most searches pursuant to a search warrant, items of identification, such as letters, bills, rent receipts, checks, check stubs, driver's licenses, keys, identification cards, miscellaneous documents, paperwork with names and numbers and the like are discovered, and are relevant to the possession, dominion, and control of the vehicle or property where evidence is located, and therefore should be seized as evidence. Additionally, I know from training and experience that firearms purchased legally may wind up being possessed by other persons, and that documentation of this control such as photographs, handwritten notes, videos, and other miscellaneous documents can record this possession, or transfer.

21. Based on my training and experience, I know that people involved in the possession of firearms often use vehicles. I know through training and experience those items of value including firearms and the records of the sale or purchase of the firearms are often kept in

automobiles by persons who possess firearms. Such items are seized regularly from vehicles located at the scene of search warrants.

22. Based on training and experience, I know that people often carry evidence of their own true identity in their vehicles. These items of identification include, but are not limited to, vehicle registration forms, driver's licenses or identification cards, credit card receipts, mail, proof of automobile insurance, and tools engraved or marked with the identifying numbers or names of persons owning a vehicle.

23. Based on training and experience, I know people involved in illegal activity have a need to communicate with other persons in order to facilitate their illegal activity. Equipment frequently used by these individuals includes cell phones and answering machines, and that the information stored in these devices contains items of evidentiary value. This information often includes phone numbers, coded messages, text messages, identification of callers, photographs of co-conspirators, and other related information. I know that subjects who possess firearms often take photos of these firearms and store them in the electronic memories of cell phones

Probable Cause With Respect To Electronic Items to be Seized

24. The seized items fall into the following categories: (1) computers; (2) cell phones, (3) electronic storage media (thumb drives, CDs, storage cards), (4) mail items. With respect to mail and other documents, these are relevant to show dominion and control over the premises where other evidence was found, and may also include communications, records, plans, or other evidence relevant to the crimes.

Probable Cause For Digital Evidence To Be Seized

25. With respect to computers, from his training and experience, SA Summers knows that criminals in general use computers to plan and coordinate activities by creating documents,

communicating via electronic methods such as e mail and by accessing the Internet to communicate and obtain information. SA Summers has reviewed numerous postings and emails to show computer usage. Also, electronic communications such as e-mails are likely to leave evidence of their being sent on the computer. Address books and contact lists are also fruitful sources of evidence, as they commonly reveal names and other information about victims or potential victims. Address books and contact lists are often stored on computers.

26. With respect to cell phones, from his training and experience, SA Summers knows that many cellular telephones especially "smart phones" have the same capability of computers and therefore may contain evidence similar to that of a computer.

27. With respect to the seized digital cameras and media/storage cards from digital cameras, SA Summers knows, from his training and experience that evidence relevant to criminal investigations is commonly found on digital cameras and camera storage cards. Photographs stored on the digital cameras and cards from digital cameras may help to identify the owner's associates and conspirators. The digital cameras and media cards from digital cameras may include photographs of past criminal actions, or evidence of a crime. In this instance REYNOLDS has documented almost 100 hundred images on his personal Facebook account. Some of these images are photographs of emails he has sent to various individuals related to this search warrant.

28. With respect to the seized electronic storage devices such as thumb drives, DVDs, and CDs, SA Summers knows, from his training and experience that a wide variety of evidence may be found on these devices. Data from cell phones, cameras, and other devices can easily be transferred and stored to thumb drives, DVDs, and CDs. Thus, any evidence that one can expect

to find on a cell phone, camera, or other device may also be found stored on thumb drives, DVDs, and CDs.

Search and Seizure of Digital Data

29. This application seeks permission to search for and seize evidence of the crime described above, including evidence of how computers, digital devices, and digital storage media were used, the purpose of their use, and who used them.

30. Based upon my training and experience, and information related to me by agents and others involved in the forensic examination of computers and digital devices, I know that data in digital form can be stored on a variety of systems and storage devices, including hard disk drives, floppy disks, compact disks, magnetic tapes, flash drives, and memory chips. Some of these devices can be smaller than a thumbnail and can take several forms, including thumb drives, secure digital media used in phones and cameras, personal music devices, and similar items.

Removal of Data Storage Devices

31. I know that a forensic image is an exact physical copy of a data storage device. A forensic image captures all data on the subject media without viewing or changing the data in any way. Absent unusual circumstances, it is essential that a forensic image be obtained prior to conducting any search of data for information subject to seizure pursuant to the warrant. I also know that during the search of the premises it is not always possible to create a forensic image of or search digital devices or media for data for a number of reasons, including the following:

32. Searching digital devices can be a highly technical process that requires specific expertise and specialized equipment. Because there are so many different types of digital devices and software in use today, it is difficult to anticipate all of the necessary technical

manuals, specialized equipment, and specific expertise necessary to conduct a thorough search of the media to ensure that the data will be preserved and evaluated in a useful manner.

33. Searching digital devices can require the use of precise, scientific procedures designed to maintain the integrity of the evidence and to recover latent data not readily apparent to the casual user. The recovery of such data may require the use of special software and procedures, such as those used in a law enforcement laboratory.

34. The volume of data stored on many digital devices is typically so large that it will be highly impractical to search for data during the execution of the physical search of the premises. Storage devices capable of storing 500 gigabytes of data are now commonplace in desktop computers. It can take several hours, or even days, to image a single hard drive. The larger the drive, the longer it takes. Depending upon the number and size of the devices, the length of time that agents must remain onsite to image and examine digital devices can become impractical.

Laboratory Setting May Be Essential For Complete And Accurate Analysis Of Data

35. Since digital data may be vulnerable to inadvertent modification or destruction, a controlled environment, such as a law enforcement laboratory, may be essential to conduct a complete and accurate analysis of the digital devices from which the data will be extracted. Software used in a laboratory setting can often reveal the true nature of data. Therefore, a computer forensic reviewer needs a substantial amount of time to extract and sort through data that is concealed or encrypted to determine whether it is evidence, contraband, or an instrumentality of a crime.

36. Analyzing the contents of a computer or other electronic storage device, even without significant technical difficulties, can be very challenging, and a variety of search and

analytical methods must be used. For example, searching by keywords, which is a limited text-based search, often yields thousands of hits, each of which must be reviewed in its context by the examiner to determine whether the data is within the scope of the warrant. Merely finding a relevant hit does not end the review process. The computer may have stored information about the data at issue which may not be searchable text, such as: who created it; when and how it was created, downloaded, or copied; when it was last accessed; when it was last modified; when it was last printed; and when it was deleted. The relevance of this kind of data is often contextual. Furthermore, many common email, database, and spreadsheet applications do not store data as searchable text, thereby necessitating additional search procedures. To determine who created, modified, copied, downloaded, transferred, communicated about, deleted, or printed data requires a search of events that occurred on the computer in the time periods surrounding activity regarding the relevant data. Information about which users logged in, whether users shared passwords, whether a computer was connected to other computers or networks, and whether the users accessed or used other programs or services in the relevant time period, can help determine who was sitting at the keyboard.

Latent Data:

- a) Searching digital devices can require the use of precise, scientific procedures designed to maintain the integrity of the evidence and to recover latent data. The recovery of such data may require the use of special software and procedures. Data that represents electronic files or remnants of such files can be recovered months or even years after it has been downloaded onto a hard drive, deleted, or viewed via the Internet. Even when such files have been deleted, they can be recovered months or years later using readily available forensic tools.

- b) Normally, when a person deletes a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in space on the hard drive or other storage media that is not allocated to an active file. In addition, a computer's operating system may keep a record of deleted data in a swap or recovery file or in a program specifically designed to restore the computer's settings in the event of a system failure.

Contextual Data:

- a) In some instances, the computer "writes" to storage media without the specific knowledge or permission of the user. Generally, data or files that have been received via the Internet are automatically downloaded into a temporary Internet directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to such data or files, and the files are only overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to retrieve artifacts of electronic activity from a hard drive depends less on when the file was downloaded or viewed than on a particular user's operating system, storage capacity, and computer usage.
- b) Logs of access to websites, file management/transfer programs, firewall permissions, and other data assist the examiner and investigators in creating a "picture" of what the computer was doing and how it was being used during the relevant time in question. Given the interrelationships of the data to various parts of the computer's operation, this information cannot be easily segregated.

37. Digital data on the hard drive that is not currently associated with any file may reveal evidence of a file that was once on the hard drive but has since been deleted or edited, or it

could reveal a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave digital data on the hard drive that show what tasks and processes on the computer were recently used. Web browsers, email programs, and chat programs store configuration data on the hard drive that can reveal information such as online nicknames and passwords. Operating systems can record additional data, such as the attachment of peripherals, the attachment of USB flash storage devices, and times the computer was in use. Computer file systems can record data about the dates files were created and the sequence in which they were created. This data can be evidence of a crime, indicate the identity of the user of the digital device, or point toward the existence of evidence in other locations. Such data may also lead to exculpatory evidence.

38. Further, evidence of how a digital device has been used, what it has been used for, and who has used it, may be learned from the absence of particular data on a digital device. Specifically, the lack of computer security software, virus protection, malicious software, evidence of remote control by another computer system, or other programs or software may assist in identifying the user indirectly and may provide evidence excluding other causes for the presence or absence of the items sought by this application.

39. Additionally, since computer drives may store artifacts from the installation of software that is no longer active, evidence of the historical presence of the kind of software and data described may have special significance in establishing timelines of usage, confirming the identification of certain users, establishing a point of reference for usage and, in some cases, assisting in the identification of certain users.

40. This data can be evidence of a crime, can indicate the identity of the user of the digital device, or can point toward the existence of evidence in other locations. Such data may

also lead to exculpatory evidence. Evidence of the absence of particular data on the drive is not generally capable of being segregated from the rest of the data on the drive.

Search Procedure

41. In searching for data capable of being read, stored, or interpreted by a computer or storage device, law enforcement personnel executing the search warrant will employ the following procedure:

- a) On-site search, if practicable. Law enforcement officers trained in computer forensics (hereafter, "computer personnel"), if present, may be able to determine if digital devices can be searched on-site in a reasonable amount of time and without jeopardizing the ability to preserve data on the devices. Any device searched on-site will be seized only if it contains data falling within the list of items to be seized as set forth in the warrant and in Attachment B.
- b) On-site imaging, if practicable. If a digital device cannot be searched on-site as described above, the computer personnel, if present, will determine whether the device can be imaged on-site in a reasonable amount of time without jeopardizing the ability to preserve the data.
- c) Seizure of digital devices for off-site imaging and search. If no computer personnel are present at the execution of the search warrant, or if they determine that a digital device cannot be searched or imaged on-site in a reasonable amount of time and without jeopardizing the ability to preserve data, the digital device will be seized and transported to an appropriate law enforcement laboratory for review.
- d) Law enforcement personnel will examine the digital device to extract and seize any data that falls within the list of items to be seized as set forth in the warrant and in

Attachment B. To the extent they discover data that falls outside the scope of the warrant that they believe should be seized (e.g., contraband or evidence of other crimes), they will seek an additional warrant.

e) Law enforcement personnel will use procedures designed to identify items to be seized under the warrant. These procedures may include the use of a “hash value” library to exclude normal operating system files that do not need to be searched. In addition, law enforcement personnel may search for and attempt to recover deleted, hidden, or encrypted data to determine whether the data falls within the list of items to be seized under the warrant.

f) If the digital device was seized or imaged, law enforcement personnel will perform an initial search of the original digital device or image within a reasonable amount of time not to exceed 120 days from the date of execution of the warrant. If, after conducting the initial search, law enforcement personnel determine that an original digital device contains any data falling within the list of items to be seized pursuant to this warrant, the government will retain the original digital device to, among other things, litigate the admissibility/authenticity of the seized items at trial, ensure the integrity of the copies, ensure the adequacy of chain of custody, and resolve any issues regarding contamination of the evidence. If the government needs additional time to determine whether an original digital device or image contains any data falling within the list of items to be seized pursuant to this warrant, it may seek an extension of the time period from the Court within the original 120-day period from the date of execution of the warrant. The government shall complete the search of the digital device or image within 180 days of the date of execution of the warrant. If the

government needs additional time to complete the search, it may seek an extension of the time period from the Court within the original 180-day period from the date of execution of the warrant.

g) If, at the conclusion of the search, law enforcement personnel determine that particular files or file folders on an original digital device or image do not contain any data falling within the list of items to be seized pursuant to the warrant, they will not search or examine those files or folders further without authorization from the Court. Law enforcement personnel may continue to examine files or data falling within the list of items to be seized pursuant to the warrant, as well as data within the operating system, file system, or software application relating or pertaining to files or data falling within the list of items to be seized pursuant to the warrant (such as log files, registry data, and the like), through the conclusion of the case.

h) If an original digital device does not contain any data falling within the list of items to be seized pursuant to this warrant, the government will return that original data device to its owner within a reasonable period of time following the search of that original data device and will seal any image of the device, absent further authorization from the Court.

Data to be Seized

42. In order to search for data that is capable of being read or interpreted by a computer, law enforcement personnel will need to seize, image, copy, and/or search the following items, subject to the procedures set forth herein:

a) Any computer equipment or digital devices that are capable of being used to commit or further the crime outlined above, or to create, access, or store contraband

or the types of evidence, fruits, or instrumentalities of such crime, as set forth in Attachment B;

b) Any computer equipment or digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the crimes outlined above, or to create, access, process, or store the types of evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B;

c) Any magnetic, electronic, or optical storage device capable of storing data, such as floppy disks, hard disks, tapes, CD-ROMs, CD-Rs, CD-RWs, DVDs, optical disks, printer or memory buffers, smart cards, PC cards, memory calculators, electronic dialers, electronic notebooks, personal digital assistants, and cell phones capable of being used to commit or further the crimes outlined above, or to create, access, or store the types of evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B;

d) Any documentation, operating logs, and reference manuals regarding the operation of the computer equipment, storage devices, or software;

e) Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the computer hardware, storage devices, or data to be searched;

f) Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the computer equipment, storage devices, or data;

- g) Any passwords, password files, test keys, encryption codes, or other information necessary to access the computer equipment, storage devices, or data, and
- h) All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any computer or digital device, that show the actual user(s) of the computers or digital devices during any time period in which the device was used to upload, download, store, receive, possess, or view child pornography, including the web browser's history; temporary Internet files; cookies, bookmarked or favorite web pages; email addresses used from the computer; MAC IDs and/or Internet Protocol addresses used by the computer; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software.

Retention of Image

43. The government will retain a forensic image of each electronic storage device subjected to analysis for a number of reasons, including proving the authenticity of evidence to be used at trial; responding to questions regarding the corruption of data; establishing the chain of custody of data; refuting claims of fabricating, tampering, or destroying data; and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.

Inventory and Return

44. With respect to the seizure of electronic storage media or the seizure or imaging of electronically stored information, the search warrant return to the Court will describe the physical storage media that were seized or imaged.

45. Based on the above, I believe there is probable cause that a firearm, and other firearms, ammunition, and other firearms-related items, as well electronic evidence related to threatening communications as described in this affidavit and in Attachment B, will be found at the residence of Greg Michael Reynolds at 35612 SE Macinnes Rd, Corbett, Oregon, or on the person of Greg Michael Reynolds, or in a Ford Ranger vehicle currently registered to REYNOLDS bearing Oregon license plate CA21276 located at 35612 SE Macinnes Rd, Corbett, Oregon, or in a Chevrolet Astro Van currently registered to REYNOLDS bearing Oregon License plate K7ZZY located at 35612 SE Macinnes Rd, Corbett, Oregon, and that said items are evidence of the crime of interstate threatening communications under Title 18, United States Code, Section 875(c). I thus request that the court issue a warrant to search the premises, including dwelling, outbuildings, and curtilage, of address 35612 SE Macinnes Rd, Corbett, Oregon along with a Ford Ranger vehicle, bearing Oregon license plate CA21276, located at 35612 SE Macinnes Rd, Corbett, Oregon, a Chevrolet Astro Van bearing Oregon License plate K7ZZY located at 35612 SE Macinnes Rd, Corbett, Oregon as well as the person of Greg Michael Reynolds, for the items described in Attachment B, and to seize the same.


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46. This affidavit and proposed search warrant have been reviewed by Assistant United States Attorney Stephen Peifer, who advised me that it is his opinion the affidavit demonstrates probable cause and that the search warrant is in proper order.



Peter Summers
Special Agent, FBI

SWORN AND SUBSCRIBED to before me this 31st day of July, 2014.



JOHN V. ACOSTA
United States Magistrate Judge

ATTACHMENT A

PLACE TO BE SEARCHED

SUBJECT 1- The person of Greg Michael Reynolds, white male, date of birth 08/17/1973

SUBJECT PREMISES 1 – located at 35612 SE Macinnes Road, Corbett Oregon, 97019, and is the residence of Greg Michael Reynolds.

Appears to be a single-floor home, which abuts a small hill. The residence is located at the end of a declined driveway, and has a brown exterior. Maroon canopies provide sun covering over the main entry door, and some of the windows facing the driveway. The front door is reached by stairs which lead from the driveway area to what appears to be a wooden deck.

SUBJECT VEHICLE 1 - a 2004 Ford Ranger, Oregon license plate number CA21276, and vehicle identifications number 1FTZR45E85PA21069. Located at SUBJECT PREMISES 1.

SUBJECT VEHICLE 2 – a 2002 Chevy Astro van, Oregon license plate number K7ZZY, and vehicle identification number 1GNEL19XX2B122592. Located at SUBJECT PREMISES 1.



REYNOLDS00000469

ATTACHMENT B

Items to be Searched For, Seized, and Examined

The following records, documents, and items that constitute evidence, contraband, fruits and/or instrumentalities of violation of 18 USC § 875 (c), Interstate communications.

- a) Documents to include notices, bills, letters, and written communications ;
- b) Any handgun or firearm ammunition, written documents relating to firearms, cleaning kits, holsters, targets, spent cartridges, gun cases or safes;
- c) Cellular telephones to include smart phones;
- d) Computers, laptops, and electronic media storage devices;
- e) Usernames or passwords pertaining to computer access, electronic mail accounts greynolds@portlandstate.org, greynolds73@gmail.com, reynoldsvs.psu@gmail.com, and cellular telephones related thereto.
- f) Contact lists or documents associated with Portland State University.

Certified to be a true and correct
copy of original filed in this district.
AUG 15 2014
Dated _____
Mary L. Moran, Clerk of Court
US District Court of Oregon
By Deputy Clerk m. Lanning
Pages 1 Through 4

UNITED STATES DISTRICT COURT

for the
DISTRICT OF OREGON

Portland Division

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Case No.

'14-MC-301-B

Residence located at located at 35612 SE Macinnes
Road, Corbett Oregon, 97019

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the _____ District of _____ Oregon
(identify the person or describe the property to be searched and give its location):

as described in Attachment A which is attached hereto and incorporated herein by this reference.

The person or property to be searched, described above, is believed to conceal (identify the person or describe the
property to be seized):

The information and items set forth in Attachment B which is attached hereto and incorporated herein by this reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or
property.

YOU ARE COMMANDED to execute this warrant on or before

August 14, 2014
(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10 p.m. ☐ at any time in the day or night as I find reasonable cause has been
established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an
inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge

duty magistrate judge
(name)

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay
of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be
searched or seized (check the appropriate box) ☐ for _____ days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____.

Date and time issued:

July 31, 2014
3:50 p.m.

Judge's signature

City and state: Portland, Oregon

John V. Acosta, U.S. Magistrate Judge

Printed name and title

REYNOLDS00000471

Return

Case No.:

2660 - P0 - 5300220

Date and time warrant executed:

Aug 6, 2014 ~~10:35~~ 0830

Copy of warrant and inventory left with:

Cody M KUSHEL

Inventory made in the presence of:

John Sorenson

Inventory of the property taken and name of any person(s) seized:

~~Two~~ Notepads on floor in Room G.

Blue sticky note on Desk in Room G

Black and Grey laptop case containing documents on floor in Room B

Black Trager backpack containing documents, Room G

Acer Aspire SN LXPY90200101902NCF2000 -

Black Motorola Smartphone and charging cable - Room A

Black Toshiba Tablet SN 9B033523R - Room A

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Aug 15, 2014

Date



Executing officer's signature

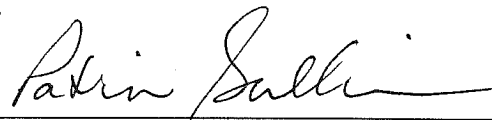
SA Peter Summers

Printed name and title

Subscribed, sworn to, and returned before me this date.

8/15/2014

Date



Judge's signature

REYNOLDS00000472

ATTACHMENT A

PLACE TO BE SEARCHED

SUBJECT 1- The person of Greg Michael Reynolds, white male, date of birth 08/17/1973

SUBJECT PREMISES 1 – located at 35612 SE Macinnes Road, Corbett Oregon, 97019, and is the residence of Greg Michael Reynolds.

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SUBJECT VEHICLE 2 – a 2002 Chevy Astro van, Oregon license plate number K7ZZY, and vehicle identification number 1GNEL19XX2B122592. Located at SUBJECT PREMISES 1.



REYNOLDS00000473

ATTACHMENT B

Items to be Searched For, Seized, and Examined

The following records, documents, and items that constitute evidence, contraband, fruits and/or instrumentalities of violation of 18 USC § 875 (c), Interstate communications.

- a) Documents to include notices, bills, letters, and written communications ;
- b) Any handgun or firearm ammunition, written documents relating to firearms, cleaning kits, holsters, targets, spent cartridges, gun cases or safes;
- c) Cellular telephones to include smart phones;
- d) Computers, laptops, and electronic media storage devices;
- e) Usernames or passwords pertaining to computer access, electronic mail accounts greynolds@portlandstate.org, greynolds73@gmail.com, reynoldsvs.psu@gmail.com, and cellular telephones related thereto.
- f) Contact lists or documents associated with Portland State University.

Certified to be a true and correct copy of original filed in this District.

Dated 7-31-14

Mary L. Moran, Clerk of Court

US District Court of Oregon

By Deputy Clerk [Signature]

Pages 1 Through 26

UNITED STATES DISTRICT COURT

for the
District of Oregon

FILED 31 JUL '14 16:09 USDC-ORP

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Residence located at located at 35612 SE Macinnes
Road, Corbett Oregon, 97019

Case No.

'14-MC-301-B

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

as described in Attachment A which is attached hereto and incorporated herein by this reference.

located in the _____ District of _____ Oregon, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
Title 18 U.S.C 875 (c)

Interstate Communication

Offense Description

The application is based on these facts:
See affidavit which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Special Agent Peter Summers

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 31, 2014

City and state: Portland, Oregon

Judge's signature

John V. Acosta, United States Magistrate Judge

Printed name and title

REYNOLDS00000475

STATE OF OREGON

County of Multnomah

)
) ss.
)

AFFIDAVIT OF
Peter Summers

I, Peter Summers, being first duly sworn, do hereby depose and say:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed for approximately three years. I am trained in investigating a wide variety of violations of federal criminal law. I am currently assigned to and work on the Joint Terrorism Task Force (JTTF).

2. I have been a Special Agent for three years. I am currently assigned to the FBI's Portland office. I am authorized, and presently assigned, to investigate Domestic Terrorism, specifically anti-government extremists, and crimes related to these groups. I am currently investigating a violation of Title 18, United States Code, Section 875(c) Interstate Communications (commonly known as threatening communications). I have received training in Domestic Terrorism, the laws, investigations and violations pertaining to Domestic Terrorism at the FBI's Counterterrorism Investigations and Operations course located at Manassas, Virginia.

3. I have also acquired knowledge and information about the groups, organizations, motivations and various means and methods: formal and informal training, other law enforcement officers and investigators, informants, persons whom I have arrested and/or interviewed, and my participation in numerous other investigations.

4. I know the following statute provides for criminal violation:

- 18 U.S.C. § 875(c) Interstate Communications, makes it unlawful for any person to:
(c) Transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

REYNOLDS00000476

5. This affidavit is made in support of a search warrant for the premises, including the dwelling, outbuildings, curtilage, and vehicles thereon, located at 35612 SE Macinnes Road, Corbett, Oregon 97019, as well as the person and vehicles of Greg Michael Reynolds. This warrant is being sought in connection with an investigation relating to violation of federal laws governing interstate communications by Greg Michael Reynolds in the Judicial District of Oregon.

HISTORY OF SUBJECTS INVOLVED

6. Greg Michael Reynolds, date of birth 08/17/1973, is a convicted felon. I have reviewed documents showing that Greg Michael Reynolds was convicted of the following felony, punishable by more than one year in prison:

- Delivery of Controlled substance (Schedule I) to a Minor, in violation of Ore.Rev.Stat. § 475.995, on or about February 15, 1994, in Jackson County, Circuit Court, case number 1093110439.

It appears that, pursuant to Ore.Rev.Stat. § 166.270(4)(a) and the age of the conviction, Reynolds may legally possess firearms in Oregon.

7. Oregon Department of Motor Vehicles records show that Greg Michael Reynolds has an Oregon State Driver's License, number 4836765, listing 35612 SE Macinnes Rd, Corbett, Oregon, as his current residence. Moreover, I have attempted to interview REYNOLDS once at the address 35612 SE Macinnes Rd, Corbett, Oregon, most recently on July 24, 2014. My partner Special Agent Jake Green had previously interviewed REYNOLDS, Both times REYNOLDS was present at the address. During both visits it was evident REYNOLDS resided at the address.

RELEVANT FACTS

8. The following information, facts, and occurrences are the result of my personal knowledge and investigation, my conversations with other law enforcement officers, and from my review of their reports relative to this investigation.

9. On April 9, 2014, Cody Michael Kuschel was interviewed. KUSCHEL stated he has been in an intimate relationship with REYNOLDS for three years. The two of them live together at REYNOLDS' residence located at 3516 SE Macinnes Rd, Corbett, Oregon. KUSCHEL stated that REYNOLDS told him that there is a Glock firearm in the house (aforementioned address in Corbett) and that the firearm is locked in a key/combination lock box. Kuschel stated he never personally saw the Glock in the house but was told by REYNOLDS where it was kept.

10. On July 21, 2014, at approximately 6:33 a.m. an email was sent from **reynoldsvs.psu@gmail.com** to **balzerj@pdx.edu**, an email account assigned to Jackie Balzer, the former Vice President for Enrollment Management & Student Affairs at Portland State University. The email was also sent to specific employees of Portland State University, news organizations, and others. The verbatim email content is as follows (with misspellings in original):

Dear Jackie:

Now that you have violated my constitutional and civil rights and the Multnomah County DA's office, the US Department of Education, Governor John Kitzhabers office, the entire US Senate and the entire PSU Board of Trustees have authorized me to shoot you with a Glock 17 9mm are you prepared to accept your fate as you have without due

process have forced to me accept mine? I have done nothing to anyone that PSU did not, in violation of the law do to me first. I am simply upholding PSU's Code of Conduct.

I am prepared deliver your sentence as also accepted by the Circuit Courts of the State of Oregon, Multnomah County.

Have a nice day. I look forward to seeing you soon.

Greg Reynolds

11. On July 18, 2014, at approximately 6:50 a.m., an email was sent from both **reynolds@portlandstate.org** and **greynolds73@gmail.com** (known email addresses used repeatedly by Greg Michael Reynolds) to **nancy.cozine@opds.state.or.us**, an email account assigned to Nancy Cozine, the Executive Director for the Oregon State Public Defender's office. The email was also sent to specific employees of Portland State University, news organizations, and others. The verbatim email content is as follows (with misspellings in original):

Dear Nancy Cozine and the Oregon Public Defenders Office:

Now that you are a witness to the fact the the laws of this nation and the Constitution do no apply to me, you must understand that in lieu of due process Portland State University has determined I am "permenently and irreversibly" expelled from all rights and obligations under all state and federal laws. This has been confirmed along with my right to shoot those in the face with a Glock 17 9mm for violating my rights and denial of due process. This may include you per the Portland State University record and all board of trustees members, our great dictator Osama Bin Kitzhaber, the Oregon Department of Justice (Chrystal M. Bader), the US Department of Education, the Multnomah County DA's office (Kristen Snowden), the Oregon Appellate Clerks office, each and every

member of the US Senate, the Office of the President, Multnomah County Sheriff Dan Stanton, the ACLU Oregon, Project Respond, Disability Rights Oregon Gregory Kaufory, Dominic Thomas, Michelle Toppe and Earl Blumenauer.

In lieu of due process I have been authorized to take further actions as necessary.

Sincerely

Greg M. Reynolds

12. On July 23, 2014, at approximately 7:55 a.m., an email was sent from **reynolds@portlandstate.org** and **greynolds73@gmail.com** to an account assigned to Dominic Thomas, Director of Student Conduct, and an email account assigned to Michelle Toppe, Dean of Student Life, both at Portland State University. The email was also sent to specific employees of Portland State University, news organizations, and others. The email content is as follows (with misspellings in original):

Date: Wed, 23 Jul 2014 07:55:22 -0700

Subject:

Dear Dominic Thomas and Michelle Toppe:

Since I have been authorized by the US Senate, Governor, Board of Trustees, Multnomah County DA (Kristen Snowden), and the Oregon Department of Justice (Chrystal M. Bader) to shoot you with a Glock 17 9mm for violating my Constitutional and Civil Rights, you should ask yourselves, are prepared to die today?

In the name of Jesus, Justice and the PSU Code of Conduct. Amen.

Sincerely

Greg M. Reynolds

13. On June 9, 2014, at approximately 6:08 a.m., an email was sent from **reynoldsvs.psu@gmail.com** to **whittenc@pdx.edu**, an email account assigned to Craig Whitten, a Lieutenant with Portland State University Security. The email was also sent to other people at Portland State University, government and law enforcement organizations. The email verbatim content is as follows :

Dear Craig Whitten, Craig Baker and Chief of Campus Public Safety:

I was tried and convicted by your department. You have violated my constitutional and civil rights without question. As of today that changes forever. As ordered by Jackie Balzer and PSU and has been universally accepted as law by each and every member of the US Senate, the office of the President of the United States, the PSU Board of Trustees, Jim Fransceoni, Commissioner Kaufry, Gregory Kafury, Governor John Kitzhaber, the Oregon Attorney Generals office, the Multnomah County Sheriff's office, the Circuit Courts of the State of Oregon cases 120970073, 140201438, the Social Security Administration, the US Department of Justice, the FBI, Disability Rights Oregon, Congressman Blumenauer case 00504061-74463, Oregon BAR TWJ1400136, as well on the approval of Kristen Snowden Multnomah County DA's office and Chrystal M. Bader with the Oregon Department of Justice hereby affirm that the law does not apply to Greg Reynolds, you are allowed to entrap people and impersonate police officers without consequence and I am fully authorized by the courts as of 15 May 2014, to shoot you in the face with a Glock 17 9mm in defense of the rights your criminal activities have denied me. I have yet to see a day in court as guaranteed by Senator Wyden, but you criminals run free. I intend to defend myself by any means necessary in lieu of application of the law.

Affidavit of Peter Summers

Page 6

REYNOLDS00000481

This is war.

Sincerely

Greg M. Reynolds

14. Based on the threatening verbage and explicit threats, I have probable cause to believe REYNOLDS has violated 18 U.S.C § 875(c). I know from personal experience and research that email servers, particularly gmail, are located outside the State of Oregon and that email transmissions within Oregon necessarily travel outside the state. On July 24, 2014, writer and Special Agent Jake Green attempted to interview REYNOLDS at his home located at 35612 SE Macinnes Rd, Corbett, Oregon 97019. REYNOLDS declined to be interviewed. About 10 to 15 minutes after writer departed the residence, an email was sent via reynolds@portlandstate.org to numerous persons, many of whom have received threats from Reynolds, specifically Dominic Thomas and Michelle Toppe. The verbatim email content is as follows:

Dear Dominic and Michelle:

The FBI was just here. They tore up my driveway on video as they were leaving because they once again came here without a warrant. You have violated my constitutional and civil rights, the most you can do is lick my pussy. Kind of like how you treated me when you broke the law.

Sincerely

Greg M. Reynolds

Record of this visit was also record by 911 phone call to report the threats made to me at my residence without due process or warrants.

15. On July 30, 2014, writer spoke with Chief of Public Safety at Portland State University (PSU) Phillip Zerzan, who stated, in addition to being expelled, Reynolds was barred for two years from PSU property prior to the emails quoted in this affidavit.

16. On July 29, 2014, a federal grand jury in this District returned a sealed indictment charging REYNOLDS with two counts of interstate threatening communications, in violation of 18 U.S.C. § 875(c), regarding two of the aforementioned threats to Portland State University employees.

17. Based on emails from REYNOLDS claiming to have access to a firearm, specifically a Glock 17, and a named associate stating REYNOLDS claims to have a Glock firearm in his home, I have probable cause to believe Greg Michael Reynolds is in possession of a firearm.

18. Based on my training and experience, I know that firearms and firearms accessories are valuable commodities and are kept for long periods of time. I know from training and experience that it is common practice among persons who possess firearms either legally or illegally for them to secrete the firearms and firearms accessories upon their person, upon the persons of co-conspirators, within their vehicles, within their residence, and within the boundaries of the curtilage of their residences. Secreting of the firearms and firearms accessories outside the residence, but within the boundaries of the residential curtilage, and within their vehicles, is a practice of persons who possess firearms, and is an attempt on their part to prevent the firearms and firearms accessories from being stolen by persons in the criminal community, and to prevent their firearms and firearms accessories from being discovered by law enforcement in the event of the service of a search warrant. I also know from training and experience that it is

common practice among persons who possess firearms, to have several firearms in their possession, and to collect firearms, due to their value.

19. Based on my training and experience, I know that people who have firearms have other various components related to firearms, such as cleaning kits, spare parts for firearms, holsters, ammunition, magazines and other ammunition storage devices, bullets, shell casings, primers, powders, reloading equipment, firearm boxes/cases, lockboxes, trigger locks, scopes, laser sights and other gun-related optics, receipts, memoranda and/or notes pertaining to the acquisition, receipt, purchase, repair or disposition of firearms, books, diagrams, manuals, photographs both in print and on digital media, undeveloped film and videos, and gun safes. These items can be stored on their person, in their vehicle or a vehicle that they are driving, and/or in their residence, outbuildings and curtilage.

20. Based on my training and experience, I know as a law enforcement officer that, during the course of most searches pursuant to a search warrant, items of identification, such as letters, bills, rent receipts, checks, check stubs, driver's licenses, keys, identification cards, miscellaneous documents, paperwork with names and numbers and the like are discovered, and are relevant to the possession, dominion, and control of the vehicle or property where evidence is located, and therefore should be seized as evidence. Additionally, I know from training and experience that firearms purchased legally may wind up being possessed by other persons, and that documentation of this control such as photographs, handwritten notes, videos, and other miscellaneous documents can record this possession, or transfer.

21. Based on my training and experience, I know that people involved in the possession of firearms often use vehicles. I know through training and experience those items of value including firearms and the records of the sale or purchase of the firearms are often kept in

Affidavit of Peter Summers

automobiles by persons who possess firearms. Such items are seized regularly from vehicles located at the scene of search warrants.

22. Based on training and experience, I know that people often carry evidence of their own true identity in their vehicles. These items of identification include, but are not limited to, vehicle registration forms, driver's licenses or identification cards, credit card receipts, mail, proof of automobile insurance, and tools engraved or marked with the identifying numbers or names of persons owning a vehicle.

23. Based on training and experience, I know people involved in illegal activity have a need to communicate with other persons in order to facilitate their illegal activity. Equipment frequently used by these individuals includes cell phones and answering machines, and that the information stored in these devices contains items of evidentiary value. This information often includes phone numbers, coded messages, text messages, identification of callers, photographs of co-conspirators, and other related information. I know that subjects who possess firearms often take photos of these firearms and store them in the electronic memories of cell phones

Probable Cause With Respect To Electronic Items to be Seized

24. The seized items fall into the following categories: (1) computers; (2) cell phones, (3) electronic storage media (thumb drives, CDs, storage cards), (4) mail items. With respect to mail and other documents, these are relevant to show dominion and control over the premises where other evidence was found, and may also include communications, records, plans, or other evidence relevant to the crimes.

Probable Cause For Digital Evidence To Be Seized

25. With respect to computers, from his training and experience, SA Summers knows that criminals in general use computers to plan and coordinate activities by creating documents,

Affidavit of Peter Summers

Page 10

REYNOLDS00000485

communicating via electronic methods such as e mail and by accessing the Internet to communicate and obtain information. SA Summers has reviewed numerous postings and emails to show computer usage. Also, electronic communications such as e-mails are likely to leave evidence of their being sent on the computer. Address books and contact lists are also fruitful sources of evidence, as they commonly reveal names and other information about victims or potential victims. Address books and contact lists are often stored on computers.

26. With respect to cell phones, from his training and experience, SA Summers knows that many cellular telephones especially "smart phones" have the same capability of computers and therefore may contain evidence similar to that of a computer.

27. With respect to the seized digital cameras and media/storage cards from digital cameras, SA Summers knows, from his training and experience that evidence relevant to criminal investigations is commonly found on digital cameras and camera storage cards. Photographs stored on the digital cameras and cards from digital cameras may help to identify the owner's associates and conspirators. The digital cameras and media cards from digital cameras may include photographs of past criminal actions, or evidence of a crime. In this instance REYNOLDS has documented almost 100 hundred images on his personal Facebook account. Some of these images are photographs of emails he has sent to various individuals related to this search warrant.

28. With respect to the seized electronic storage devices such as thumb drives, DVDs, and CDs, SA Summers knows, from his training and experience that a wide variety of evidence may be found on these devices. Data from cell phones, cameras, and other devices can easily be transferred and stored to thumb drives, DVDs, and CDs. Thus, any evidence that one can expect

to find on a cell phone, camera, or other device may also be found stored on thumb drives, DVDs, and CDs.

Search and Seizure of Digital Data

29. This application seeks permission to search for and seize evidence of the crime described above, including evidence of how computers, digital devices, and digital storage media were used, the purpose of their use, and who used them.

30. Based upon my training and experience, and information related to me by agents and others involved in the forensic examination of computers and digital devices, I know that data in digital form can be stored on a variety of systems and storage devices, including hard disk drives, floppy disks, compact disks, magnetic tapes, flash drives, and memory chips. Some of these devices can be smaller than a thumbnail and can take several forms, including thumb drives, secure digital media used in phones and cameras, personal music devices, and similar items.

Removal of Data Storage Devices

31. I know that a forensic image is an exact physical copy of a data storage device. A forensic image captures all data on the subject media without viewing or changing the data in any way. Absent unusual circumstances, it is essential that a forensic image be obtained prior to conducting any search of data for information subject to seizure pursuant to the warrant. I also know that during the search of the premises it is not always possible to create a forensic image of or search digital devices or media for data for a number of reasons, including the following:

32. Searching digital devices can be a highly technical process that requires specific expertise and specialized equipment. Because there are so many different types of digital devices and software in use today, it is difficult to anticipate all of the necessary technical

manuals, specialized equipment, and specific expertise necessary to conduct a thorough search of the media to ensure that the data will be preserved and evaluated in a useful manner.

33. Searching digital devices can require the use of precise, scientific procedures designed to maintain the integrity of the evidence and to recover latent data not readily apparent to the casual user. The recovery of such data may require the use of special software and procedures, such as those used in a law enforcement laboratory.

34. The volume of data stored on many digital devices is typically so large that it will be highly impractical to search for data during the execution of the physical search of the premises. Storage devices capable of storing 500 gigabytes of data are now commonplace in desktop computers. It can take several hours, or even days, to image a single hard drive. The larger the drive, the longer it takes. Depending upon the number and size of the devices, the length of time that agents must remain onsite to image and examine digital devices can become impractical.

Laboratory Setting May Be Essential For Complete And Accurate Analysis Of Data

35. Since digital data may be vulnerable to inadvertent modification or destruction, a controlled environment, such as a law enforcement laboratory, may be essential to conduct a complete and accurate analysis of the digital devices from which the data will be extracted. Software used in a laboratory setting can often reveal the true nature of data. Therefore, a computer forensic reviewer needs a substantial amount of time to extract and sort through data that is concealed or encrypted to determine whether it is evidence, contraband, or an instrumentality of a crime.

36. Analyzing the contents of a computer or other electronic storage device, even without significant technical difficulties, can be very challenging, and a variety of search and

analytical methods must be used. For example, searching by keywords, which is a limited text-based search, often yields thousands of hits, each of which must be reviewed in its context by the examiner to determine whether the data is within the scope of the warrant. Merely finding a relevant hit does not end the review process. The computer may have stored information about the data at issue which may not be searchable text, such as: who created it; when and how it was created, downloaded, or copied; when it was last accessed; when it was last modified; when it was last printed; and when it was deleted. The relevance of this kind of data is often contextual. Furthermore, many common email, database, and spreadsheet applications do not store data as searchable text, thereby necessitating additional search procedures. To determine who created, modified, copied, downloaded, transferred, communicated about, deleted, or printed data requires a search of events that occurred on the computer in the time periods surrounding activity regarding the relevant data. Information about which users logged in, whether users shared passwords, whether a computer was connected to other computers or networks, and whether the users accessed or used other programs or services in the relevant time period, can help determine who was sitting at the keyboard.

Latent Data:

- a) Searching digital devices can require the use of precise, scientific procedures designed to maintain the integrity of the evidence and to recover latent data. The recovery of such data may require the use of special software and procedures. Data that represents electronic files or remnants of such files can be recovered months or even years after it has been downloaded onto a hard drive, deleted, or viewed via the Internet. Even when such files have been deleted, they can be recovered months or years later using readily available forensic tools.

- b) Normally, when a person deletes a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in space on the hard drive or other storage media that is not allocated to an active file. In addition, a computer's operating system may keep a record of deleted data in a swap or recovery file or in a program specifically designed to restore the computer's settings in the event of a system failure.

Contextual Data:

- a) In some instances, the computer "writes" to storage media without the specific knowledge or permission of the user. Generally, data or files that have been received via the Internet are automatically downloaded into a temporary Internet directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to such data or files, and the files are only overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to retrieve artifacts of electronic activity from a hard drive depends less on when the file was downloaded or viewed than on a particular user's operating system, storage capacity, and computer usage.
- b) Logs of access to websites, file management/transfer programs, firewall permissions, and other data assist the examiner and investigators in creating a "picture" of what the computer was doing and how it was being used during the relevant time in question. Given the interrelationships of the data to various parts of the computer's operation, this information cannot be easily segregated.

37. Digital data on the hard drive that is not currently associated with any file may reveal evidence of a file that was once on the hard drive but has since been deleted or edited, or it

could reveal a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave digital data on the hard drive that show what tasks and processes on the computer were recently used. Web browsers, email programs, and chat programs store configuration data on the hard drive that can reveal information such as online nicknames and passwords. Operating systems can record additional data, such as the attachment of peripherals, the attachment of USB flash storage devices, and times the computer was in use. Computer file systems can record data about the dates files were created and the sequence in which they were created. This data can be evidence of a crime, indicate the identity of the user of the digital device, or point toward the existence of evidence in other locations. Such data may also lead to exculpatory evidence.

38. Further, evidence of how a digital device has been used, what it has been used for, and who has used it, may be learned from the absence of particular data on a digital device. Specifically, the lack of computer security software, virus protection, malicious software, evidence of remote control by another computer system, or other programs or software may assist in identifying the user indirectly and may provide evidence excluding other causes for the presence or absence of the items sought by this application.

39. Additionally, since computer drives may store artifacts from the installation of software that is no longer active, evidence of the historical presence of the kind of software and data described may have special significance in establishing timelines of usage, confirming the identification of certain users, establishing a point of reference for usage and, in some cases, assisting in the identification of certain users.

40. This data can be evidence of a crime, can indicate the identity of the user of the digital device, or can point toward the existence of evidence in other locations. Such data may

also lead to exculpatory evidence. Evidence of the absence of particular data on the drive is not generally capable of being segregated from the rest of the data on the drive.

Search Procedure

41. In searching for data capable of being read, stored, or interpreted by a computer or storage device, law enforcement personnel executing the search warrant will employ the following procedure:

- a) On-site search, if practicable. Law enforcement officers trained in computer forensics (hereafter, "computer personnel"), if present, may be able to determine if digital devices can be searched on-site in a reasonable amount of time and without jeopardizing the ability to preserve data on the devices. Any device searched on-site will be seized only if it contains data falling within the list of items to be seized as set forth in the warrant and in Attachment B.
- b) On-site imaging, if practicable. If a digital device cannot be searched on-site as described above, the computer personnel, if present, will determine whether the device can be imaged on-site in a reasonable amount of time without jeopardizing the ability to preserve the data.
- c) Seizure of digital devices for off-site imaging and search. If no computer personnel are present at the execution of the search warrant, or if they determine that a digital device cannot be searched or imaged on-site in a reasonable amount of time and without jeopardizing the ability to preserve data, the digital device will be seized and transported to an appropriate law enforcement laboratory for review.
- d) Law enforcement personnel will examine the digital device to extract and seize any data that falls within the list of items to be seized as set forth in the warrant and in

Attachment B. To the extent they discover data that falls outside the scope of the warrant that they believe should be seized (e.g., contraband or evidence of other crimes), they will seek an additional warrant.

e) Law enforcement personnel will use procedures designed to identify items to be seized under the warrant. These procedures may include the use of a "hash value" library to exclude normal operating system files that do not need to be searched. In addition, law enforcement personnel may search for and attempt to recover deleted, hidden, or encrypted data to determine whether the data falls within the list of items to be seized under the warrant.

f) If the digital device was seized or imaged, law enforcement personnel will perform an initial search of the original digital device or image within a reasonable amount of time not to exceed 120 days from the date of execution of the warrant. If, after conducting the initial search, law enforcement personnel determine that an original digital device contains any data falling within the list of items to be seized pursuant to this warrant, the government will retain the original digital device to, among other things, litigate the admissibility/authenticity of the seized items at trial, ensure the integrity of the copies, ensure the adequacy of chain of custody, and resolve any issues regarding contamination of the evidence. If the government needs additional time to determine whether an original digital device or image contains any data falling within the list of items to be seized pursuant to this warrant, it may seek an extension of the time period from the Court within the original 120-day period from the date of execution of the warrant. The government shall complete the search of the digital device or image within 180 days of the date of execution of the warrant. If the

government needs additional time to complete the search, it may seek an extension of the time period from the Court within the original 180-day period from the date of execution of the warrant.

g) If, at the conclusion of the search, law enforcement personnel determine that particular files or file folders on an original digital device or image do not contain any data falling within the list of items to be seized pursuant to the warrant, they will not search or examine those files or folders further without authorization from the Court. Law enforcement personnel may continue to examine files or data falling within the list of items to be seized pursuant to the warrant, as well as data within the operating system, file system, or software application relating or pertaining to files or data falling within the list of items to be seized pursuant to the warrant (such as log files, registry data, and the like), through the conclusion of the case.

h) If an original digital device does not contain any data falling within the list of items to be seized pursuant to this warrant, the government will return that original data device to its owner within a reasonable period of time following the search of that original data device and will seal any image of the device, absent further authorization from the Court.

Data to be Seized

42. In order to search for data that is capable of being read or interpreted by a computer, law enforcement personnel will need to seize, image, copy, and/or search the following items, subject to the procedures set forth herein:

a) Any computer equipment or digital devices that are capable of being used to commit or further the crime outlined above, or to create, access, or store contraband

or the types of evidence, fruits, or instrumentalities of such crime, as set forth in Attachment B;

- b) Any computer equipment or digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the crimes outlined above, or to create, access, process, or store the types of evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B;
- c) Any magnetic, electronic, or optical storage device capable of storing data, such as floppy disks, hard disks, tapes, CD-ROMs, CD-Rs, CD-RWs, DVDs, optical disks, printer or memory buffers, smart cards, PC cards, memory calculators, electronic dialers, electronic notebooks, personal digital assistants, and cell phones capable of being used to commit or further the crimes outlined above, or to create, access, or store the types of evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B;
- d) Any documentation, operating logs, and reference manuals regarding the operation of the computer equipment, storage devices, or software;
- e) Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the computer hardware, storage devices, or data to be searched;
- f) Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the computer equipment, storage devices, or data;

- g) Any passwords, password files, test keys, encryption codes, or other information necessary to access the computer equipment, storage devices, or data, and
- h) All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any computer or digital device, that show the actual user(s) of the computers or digital devices during any time period in which the device was used to upload, download, store, receive, possess, or view child pornography, including the web browser's history; temporary Internet files; cookies, bookmarked or favorite web pages; email addresses used from the computer; MAC IDs and/or Internet Protocol addresses used by the computer; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software.

Retention of Image

43. The government will retain a forensic image of each electronic storage device subjected to analysis for a number of reasons, including proving the authenticity of evidence to be used at trial; responding to questions regarding the corruption of data; establishing the chain of custody of data; refuting claims of fabricating, tampering, or destroying data; and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.

Inventory and Return

44. With respect to the seizure of electronic storage media or the seizure or imaging of electronically stored information, the search warrant return to the Court will describe the physical storage media that were seized or imaged.

45. Based on the above, I believe there is probable cause that a firearm, and other firearms, ammunition, and other firearms-related items, as well electronic evidence related to threatening communications as described in this affidavit and in Attachment B, will be found at the residence of Greg Michael Reynolds at 35612 SE Macinnes Rd, Corbett, Oregon, or on the person of Greg Michael Reynolds, or in a Ford Ranger vehicle currently registered to REYNOLDS bearing Oregon license plate CA21276 located at 35612 SE Macinnes Rd, Corbett, Oregon, or in a Chevrolet Astro Van currently registered to REYNOLDS bearing Oregon License plate K7ZZY located at 35612 SE Macinnes Rd, Corbett, Oregon, and that said items are evidence of the crime of interstate threatening communications under Title18, United States Code, Section 875(c). I thus request that the court issue a warrant to search the premises, including dwelling, outbuildings, and curtilage, of address 35612 SE Macinnes Rd, Corbett, Oregon along with a Ford Ranger vehicle, bearing Oregon license plate CA21276, located at 35612 SE Macinnes Rd, Corbett, Oregon, a Chevrolet Astro Van bearing Oregon License plate K7ZZY located at 35612 SE Macinnes Rd, Corbett, Oregon as well as the person of Greg Michael Reynolds, for the items described in Attachment B, and to seize the same.

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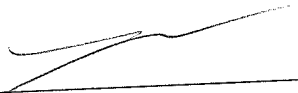
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Affidavit of Peter Summers

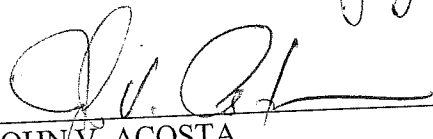
Page 22

REYNOLDS00000497

46. This affidavit and proposed search warrant have been reviewed by Assistant United States Attorney Stephen Peifer, who advised me that it is his opinion the affidavit demonstrates probable cause and that the search warrant is in proper order.


Peter Summers
Special Agent, FBI

SWORN AND SUBSCRIBED to before me this 31st day of July, 2014.


JOHN V. ACOSTA
United States Magistrate Judge

ATTACHMENT A

PLACE TO BE SEARCHED

SUBJECT 1- The person of Greg Michael Reynolds, white male, date of birth 08/17/1973

SUBJECT PREMISES 1 – located at 35612 SE Macinnes Road, Corbett Oregon, 97019, and is the residence of Greg Michael Reynolds.

Appears to be a single-floor home, which abuts a small hill. The residence is located at the end of a declined driveway, and has a brown exterior. Maroon canopies provide sun covering over the main entry door, and some of the windows facing the driveway. The front door is reached by stairs which lead from the driveway area to what appears to be a wooden deck.

SUBJECT VEHICLE 1 - a 2004 Ford Ranger, Oregon license plate number CA21276, and vehicle identifications number 1FTZR45E85PA21069. Located at SUBJECT PREMISES 1.

SUBJECT VEHICLE 2 – a 2002 Chevy Astro van, Oregon license plate number K7ZZY, and vehicle identification number 1GNEL19XX2B122592. Located at SUBJECT PREMISES 1.



ATTACHMENT B

Items to be Searched For, Seized, and Examined

The following records, documents, and items that constitute evidence, contraband, fruits and/or instrumentalities of violation of 18 USC § 875 (c), Interstate communications.

- a) Documents to include notices, bills, letters, and written communications ;
- b) Any handgun or firearm ammunition, written documents relating to firearms, cleaning kits, holsters, targets, spent cartridges, gun cases or safes;
- c) Cellular telephones to include smart phones;
- d) Computers, laptops, and electronic media storage devices;
- e) Usernames or passwords pertaining to computer access, electronic mail accounts greynolds@portlandstate.org, greynolds73@gmail.com, reynoldsvs.psu@gmail.com, and cellular telephones related thereto.
- f) Contact lists or documents associated with Portland State University.