


# Exhibit B

IN THE MATTER OF:  
United States of America v. Keith Raniere et. al.  
United States District Court, Eastern District of New York  
Case No. 1:18-cr-00204-NGG-VMS

**Supplemental Declaration**

1. I, Dr. James Richard Kiper, Ph.D., declare under penalty of perjury that the following is true and correct.
2. In this case, I concluded that digital evidence – a camera’s memory card (1B15a) and hard drive (1B16) – had been falsified and government actors must have been involved in evidentiary fraud.
3. It took me 404.5 hours of forensic and procedural analysis to come to this conclusion.
4. This effort was needed because detecting digital fraud involves analyzing potentially billions of data attributes for anomalies and then ruling out plausible explanations.
5. My conclusion that there was deliberate tampering with the memory card and significant FBI misconduct indicating government complicity was contingent upon critical information disclosed only during the last three days of trial testimony, six weeks into the trial: the Booth FTK Report, Government Exhibit 521A - Replacement, Booth’s CART notes (Defense Exhibit 961) and the Chain of Custody (DX 945.) Reaching this conclusion required approximately 200 hours of analysis and specialized knowledge of FBI practices and policies.

Executed on: 4/21/2024

DocuSigned by:  
  
9B8F4F5049A24DD...

Dr. James Richard Kiper, Ph.D.,  
Retired FBI Special Agent and Forensic Examiner