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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEONEL MICHEL VARGAS,

Defendant.

No: CR-13-6025-EFS

**GOVERNMENT'S DECLARATION IN  
SUPPORT DETERMINATION  
OF LAW ENFORCEMENT SENSITIVE  
NATURE OF POLE CAMERA  
INSTALLATION**

**DECLARATION OF SUPERVISORY SPECIAL AGENT**

(U) Comes now Steven Gumtow, Supervisory Special Agent, Federal Bureau of Investigation, and avers and declares as follows:

1. (U) I am the Chief of the Video Surveillance Unit, (VSU) of the Operational Technology Division, Federal Bureau of Investigation at Quantico, Virginia. I have

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been the Chief of this Unit for about eight months. I have been a Special Agent of the FBI for approximately ten years.


2. (U) As Chief of VSU, and in the field throughout my service in the FBI, I have been trained on the capabilities, limitations, and characteristics of video and related surveillance technologies, including the systems used in this investigation.
3. (U) I am aware that visual images were collected during this investigation from a camera system installed by other FBI employees, and that all of these images have been disclosed to the United States Attorney's Office and shared by that Office with counsel for the defendant in this case. I am also aware that the location and general characteristics of the video installation may be inferred from examination of the images produced and shared in discovery.
4. (U) I am also aware that a question exists concerning whether the FBI used, connected to, or otherwise interacted with any of Mr. Vargas' equipment as part of the process of moving the video images from the site of their capture to the site of their review.
5. (U) During the course of this investigation, at no time did the FBI relay any information, electronic or otherwise, through any connection or device, wireless or otherwise, located in whole or in part on Mr. Vargas' property.

Respectfully submitted,



Steven Guntow  
Supervisory Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn before me this 25 day of April, 2014, in Stafford County, Virginia.



Notary Public

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