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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

JESSE C. TRENTADUE,

Plaintiff,

vs.

FEDERAL BUREAU OF
INVESTIGATION,

Defendant.

**DECLARATION OF JESSE C.
TRENTADUE**

Case No.: 2:24-cv-00105-AMA-DAO
Judge Ann Marie McIff Allen
Magistrate Judge Daphne A. Oberg

1. I, Jesse C. Trentadue, am the Plaintiff in this case and pursuant to 28 U.S.C. §1746, declare as follows:

2. My *Punchout FOIA* asked for: (1) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern Roger Edwin Moore's involvement with and/or participation in *Operation Punchout*; (2) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern Roger Edwin Moore having been a confidential informant,

confidential human source or undercover operative for the FBI or any other law enforcement agency with respect to *Operation Punchout*; (3) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern Roger Edwin Moore having been granted immunity from prosecution with respect to his involvement with and/or participation in *Operation Punchout*; and (4) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern communications between Roger Edwin Moore and the FBI or one of its agents with respect to *Operation Punchout*.

3. Prior to commencement of this lawsuit, the FBI acknowledged that it had 32,580 pages of documents showing that Roger E. Moore was an undercover operative for the Bureau.¹

4. My *BOMBROB FOIA* requested the following documents/records on Richard Lee Guthrie and Timothy James McVeigh from BOMBROB and/or FBI Major Case No. 124 for the years 1993, 1994 and 1995: (1) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern Timothy James McVeigh; and (2) All documents/records that, directly or indirectly, show, report, record, memorialize, discuss, evidence or concern contacts Timothy James McVeigh had with Richard Lee Guthrie, Jr., the Aryan Republican Army, the ARA, Mid-

¹ ECF 1-6.

West Bank Bandits and/or the Mid-West Bank Robbers.

5. The *BOMBROB FOIA* essentially asked for documents showing Timothy McVeigh's involvement with the ARA prior to the Oklahoma City Bombing and the ARA's involvement in the Bombing. Prior to commencement of this lawsuit, the FBI acknowledged that it had 36,795 pages of documents showing the ARA's involvement with Timothy McVeigh and the Oklahoma City Bombing;² whereas these two pages that were produced to me relate to newspaper stories about Timothy McVeigh and have nothing to do with the ARA.

6. After this lawsuit was filed, the FBI admitted to that it “**had located approximately 69,375 pages and 3 CDs of media responsive to Plaintiff's requests.**”³ Since July of 2024, the FBI has processed my FOIA Requests at the rate of 500 pages per month. More importantly, in the past nine months the FBI has yet to produce a single documents that was responsive to my *Punchout FOIA*, and to date the FBI has produced just 17 pages of arguably responsive documents concerning my *BOMBROB FOIA*.

7. Instead of responsive documents, the FBI has produced to me 2,967 pages

² ECF 1-15.

³ *Seidel Dec.*, 18-1 ¶ 40.(emphasis added).

of filler consisting of documents with no relevance to my *FOIA Requests*.⁴

8. The FBI has also withheld at total of 703 pages of responsive documents from me under what I suspect to bogus claims of privilege and/or court orders.

9. Furthermore, the FBI contends that I will have to wait until the it completes its production of documents before I can ask the Court to review the lawfulness of the Bureau's withholding of the 703 pages of documents in their entirety, which is incredible.

10. More incredible still, at the current production rate of less than 2 pages per month, I will have to wait more than 2,500 hundred years for the FBI to produce to me the remaining 69,358 pages of responsive documents that it is unlawfully withholding.

11. The facts asserted herein are based upon my personal knowledge.

Executed under penalty of perjury this 10th day of April, 2025.

/s/ jesse c. trentadue
Jesse C. Trentadue
Pro Se Plaintiff

⁴ See ECF 26, 32, 33, 36, 37, 40, and 41.