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Pro Se Plaintiff

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

JESSE C. TRENTADUE,	:	
	:	
Plaintiff,	:	DECLARATION OF
	:	RICHARD BOOTH
vs.	:	
FEDERAL BUREAU OF	:	Case No.: 2:08cv788 CW
	:	
INVESTIGATION, <i>et al.</i>	:	Judge Clark Waddoups
	:	Magistrate Dustin B. Pead
Defendants.	:	
	:	
	:	

1. Pursuant to 28 U.S.C. §1746 I, Richard Booth, hereby declare as follows:
 2. I am a researcher, a native Oklahoman, who began to study the Oklahoma City Bombing investigation after meeting and subsequently being mentored by journalist and former 60 Minutes II and ABC News 20/20 associate producer Roger

Charles, a recognized expert and co-author (with Andrew Gumbel) of what is, in my opinion, the definitive book about the Oklahoma City Bombing, titled "*Oklahoma City—What the Investigation Missed and Why It Still Matters*" which was published in 2012.

3. I have spent years collecting and archiving many thousands of news clippings and government documents/records on the subject, putting them in chronological order and making them searchable with the goal of creating a research database to be used by students, journalists, and other professionals.

4. I am recognized as an expert on the Oklahoma City bombing and have frequently written and spoken on that subject. I served as a credited research consultant for Blowback Productions in their 2024 HBO/Max documentary film "*An American Bombing: The Road to April 19th*," which explored, among other topics, the various individuals suspected of involvement in the Oklahoma City bombing, including Roger E. Moore, Andreas Strassmeir and the ARA.

5. I publish my research on Substack at okcfacts.substack.com, which is free for all viewers (non-monetized) and serves as a central repository for essays, breaking news, and a platform for hosting the primary documents cited in my research. Many of the essays I have put on Substack were previously published by *The Libertarian Institute*, *LewRockwell.com*, and in *garrison: the Journal of History and Deep Politics*

(magazine print media), where my reporting on the bombing was the cover story for the March 2022 issue.

6. I have also been interviewed and quoted in news media accounts related to the bombing, most recently in stories published by journalist Ken Silva which appeared in the *Epoch Times* and *HeadlineUSA*. I also served as the chief research consultant for author Margaret Roberts, working on the end notes, documents appendix, and fact-checking for Roberts' forthcoming book from Post Hill Press is titled "*Blowback: The Untold Story of the FBI and the Oklahoma City Bombing*," where I am credited on the title page with the caption "research by Richard Booth."

7. My expertise on the Oklahoma City Bombing investigation includes detailed knowledge of the many witnesses who observed the others who were obviously involved in that terrorist attack; key figures of interest in that area are John Doe #2, a man seen sitting in the Ryder truck passenger seat with McVeigh on 4/19, by more than two dozen witnesses; Roger E. Moore, who provided the Kinestik explosives used to detonate the bomb that destroyed the Alfred P. Murrah Federal building; Andreas Strassmeir, a former German intelligence officer and CIA asset on loan to the FBI; and members of the FBI-infiltrated Aryan Republican Army or "ARA" who are believed to have provided material assistance to Timothy McVeigh to carry out the bombing of the Murrah Federal Building.

8. I am also familiar with Jesse C. Trentadue's *Freedom of Information Act* ("FOIA") campaigns to obtain records from the FBI and Department of Justice involving the government's investigation of the Oklahoma City Bombing, including surveillance camera videotape footage that recorded both the bombing of the Murrah Federal Building and the perpetrators of that terrorist attack.

9. On May 7, 2025, I received from Jesse C. Trentadue fifteen DVD-ROM computer discs containing FBI records related to the Oklahoma City Bombing investigation that I estimate to contain more than 1.5 million pages of FBI documents.

10. I was retained by Jesse C. Trentadue to search these discs for records related to the existence of security camera or surveillance camera video footage related to the Bombing that should have been produced to him by the FBI in response to his *FOIA Request*.

11. The discs were text searchable. Consequently, within a matter of just a few days I discovered on those discs four documents that clearly should have been produced to Jesse C. Trentadue by the FBI in response to his surveillance tapes *FOIA Request*, but they were not produced. More importantly, these documents indicate that the FBI has, but likewise did not produce, a security camera videotape that would show not only Tim McVeigh arming the truck bomb that destroyed the Murrah Federal Building, but also his accomplice.

12. The first document is **FBI Insert E-4401, by SA Rickey D. Rains, regarding WESLEY EDWARD BOGIE.**¹

13. BOGIE was the security guard on duty at the Regency Towers Apartments (“RTA”) on April 19th, 1995. This insert states that Bogie was "shown three still photographs taken from the RTA security camera on April 19, 1995, at 8:57 AM" and that "these photographs depict a Ryder truck parked across the street from the RTA and two individuals on the sidewalk."

14. This is significant because for an image to depict not only the Ryder truck, but two individuals, the field of view for such a photograph would be greater than that of the static and fixed-position ATM camera located inside the RTA lobby. These images, therefore, are still images that were extracted from video surveillance that came from one of the RTA’s exterior surveillance cameras, which had a wide field of view and a direct line-of-sight to the Murrah building and where the bombing occurred.

15. More importantly, it was while the Ryder Truck was briefly parked in front of the RTA at 8:57 AM that records and testimony indicate Tim McVeigh armed the bomb that destroyed the Murrah Federal Building a few minutes later.

16. The second document is **FBI 302 Report D-15226 by SA James Hight**

¹ A true and correct copy of this FBI Insert is attached hereto as Exhibit 1.

regarding Oklahoma City Police department Sgt. RITCHIE L. WILLIS.² These 302 report states that Sgt. Willis "personally recovered the film from the security camera located inside the Regency Towers, Northwest 5th and Hudson streets" on 4/19/95.³ This 302 further states that "Sgt. Willis said that the camera from which he obtained the tape was focused on the N.W. 5th Street area and was still recording at the time he removed the tape from the VCR on the first floor of the building."⁴

17. This document is highly significant because it establishes as fact that the tape obtained by Sgt. Willis was still recording when it was taken into custody, that the recording came from one of the RTA security cameras, that the camera depicted 5th Street, and that it was removed from a VCR.

18. These details also indicate that this footage would have been from one of the exterior-facing cameras at the building—not the ATM camera, which did not record to a VCR. This would indicate that the footage on the tape is thus highly likely to have been of crucial evidentiary value, including showing not only McVeigh but the other person who more than 20 witnesses say was also in the Ryder truck along with McVeigh.

19. The third document is **FBI Insert E-4389 by SA Rickey D. Rains regarding an interview with RTA assistant manager Mary Scott.** According to this

² A true and correct copy of this FBI Insert is attached hereto as Exhibit 2.

³ (Emphasis added).

document, Scott told Agent Rains that one of the individuals who appeared in the three photos extracted from frames of surveillance camera footage that was shown to BOGIE, was a tenant at the building named Lannie Cheadle.⁵

20. This document is significant because it indicates that the photographs extracted from the surveillance film reviewed by Bogie had a field of view, and were of such fidelity, that these photos captured a Ryder truck and two individuals, moreover, the quality was such that an individual could be recognized and identified (and was, by Bogie) which likewise indicates that the surveillance video in question here did not come from an ATM camera with limited field of view and poor resolution, but rather, from one of the exterior facing surveillance cameras.

21. The fourth document is **FBI Insert E-989 by SA Michael Costanzi is an FBI Insert, the subject of which is "identifying security companies who provided or serviced exterior surveillance cameras" to buildings in downtown OKC on April 19th, 1995.** This insert states that "MIKE KING, Security Consultant, ADT Security, 722 North Broadway Ave, OKC OK advised that his company provided exterior surveillance video cameras to the REGENCY TOWERS APARTMENTS."

⁶

22. This document is significant as it confirms as fact that ADT Security

⁴ (Emphasis added).

⁵ A true and correct copy of this FBI Insert is attached hereto as Exhibit 3.

provided the exterior surveillance cameras for the Regency (as they did for the Murrah building).

23. Finally, these four documents were easily retrieved by me from the FBI records, they are clearly responsive to Trentadue's request but were not produced. More importantly, the obvious conclusion one can draw from these documents is that the RTA videotapes contain material that the Bureau does not want people to see, namely, the still-unidentified John Doe #2 who was observed in the Ryder truck that morning with McVeigh by at least 24 separate witnesses and was, according to the original Grand Jury foreperson, Hoppy Heidelberg, "**obviously a government agent or informant and the government can't afford for that to come out because it would prove they had prior knowledge of the bombing and failed to stop it.**"⁷

Executed under penalty of perjury the 6th day of June 2025.

/s/ Richard Booth
Richard Booth

⁶ A true and correct copy of this FBI Insert is attached hereto as Exhibit 4.

⁷ See Exhibit 5 hereto. (Emphasis added).