

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS**

UNITED STATES OF AMERICA

Plaintiff,

v.

JUSTIN SHAFER,

Defendant.

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3:17-CR-00239-N-1

DECLARATION OF JENNIFER SHAFER

I, Jennifer Shafer, declare under penalty of perjury that the following is true and correct:

1. My name is Jennifer Shafer. I am the wife of Justin Shafer. I am over eighteen years of age and am not a party to this action.
2. On May 25th, 2016, at about 6:00 am, armed FBI Agents raided our family home. The FBI executed a search warrant, but had no arrest warrant. My husband, Mr. Shafer, and our children were present at the time.
3. The FBI woke us by violent pounding on the door and shouting "FBI, open up!"
4. Our ten-year old daughter got to the door first, but I immediately collected her for her safety. Mr. Shafer then opened the door.
5. When he opened the door, blinding lights flooded our residence and fully armed FBI agents entered and pointed weapons at Mr. Shafer, myself, and our children. The FBI agents prevented me from going to our other two children, a five-year old and a three-year old.
6. Mr. Shafer was then handcuffed and taken outside in his boxers. He seemed in shock, while looking at the dozens of armed FBI Agents and others raiding our home.

7. Eventually, the FBI agents allowed me, under armed escort, to gather the other children. The armed escort aimed a weapon at each of our children—a five-year-old and a three-year-old—in turn as I collected them. The children and I were then placed barefoot, in our underwear, in the back of an FBI vehicle.

8. During the search, several of our family's computers, tablet devices, and cellular phones were seized.

9. Mr. Shafer's car was damaged by the FBI in the May 25th raid.

10. On January 29, 2017, armed FBI agents from multiple FBI offices across the country raided our home again. During this raid, I asked about the return of several devices that were not Mr. Shafer's, that our family needed to conduct personal business, prepare taxes using data stored on those devices, and which contained family photos and videos.

11. An FBI agent told me they would call me about arranging return of those items. To this date, no follow-up call has occurred.

12. On March 31, 2017, a Friday evening, armed FBI agents again raided our family home for a third time. Mr. Shafer was not present, but the children and I were. We were taken to the front of our house, then made to stand in our neighbor's yard, and the FBI agents ordered me to call Mr. Shafer to tell him to return home. The FBI agents then seized my phone, and then seized additional computers in our home.

13. Mr. Shafer then returned home and turned himself in.

14. These violent raids have caused lasting psychological trauma for our family. Our children now suffer from trauma and emotional distress because of these armed FBI raids.

15. Our three-year old is now unable to sleep alone in her room.
16. Our (now) six-year old is struggling and withdrawn in school where he was once excelling.
17. Our ten-year old is now afraid to be near open shades, out of fear of being surveilled.

Executed on: October 31, 2017

A handwritten signature in black ink, appearing to read "Jennifer Shafer", written over a horizontal line.

Jennifer Shafer