

DECLARATION OF OLIVIER N. FARACHE

I, Olivier N. Farache, hereby declare as follows:


1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"); was involved in the case of United States v. Aguilar, et al., CR 10-1031(A)-AHM; and had some contact with Jean Guy Lamarche during of the prosecution of the Aguilar matter.

2. I have been informed that Alain Brunelle, a defense investigator, has filed a declaration in the Aguilar case in which he states that he interviewed Jean Guy Lamarche in person on March 23, 2011, and also spoke with Lamarche by telephone on May 4, 2011. According to Brunelle's declaration, during his May 4 telephone conversation with Lamarche, Lamarche told Brunelle that after the March 23 interview, Lamarche spoke with one of the FBI agents involved in the Aguilar case and Lamarche informed the FBI agent that he had been interviewed by Brunelle (or a defense investigator). Brunelle's declaration also states that on May 4, Lamarche told Brunelle that the FBI agent was furious with him for speaking with a defense investigator.

3. During my contacts with Lamarche, I never expressed "fury" or anger towards him. In addition, I never told Lamarche or suggested to him that he should not speak with the defense.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this

1st day of September, 2011, at Los Angeles, California.



OLIVIER N. FARACHE

DECLARATION OF FARRELL BINDER

I, Farrell Binder, hereby declare as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"); was involved in the case of United States v. Aguilar, et al., CR 10-1031(A)-AHM; and had some contact with Jean Guy Lamarche during of the prosecution of the Aguilar matter.

2. I have been informed that Alain Brunelle, a defense investigator, has filed a declaration in the Aguilar case in which he states that he interviewed Jean Guy Lamarche in person on March 23, 2011, and also spoke with Lamarche by telephone on May 4, 2011. According to Brunelle's declaration, during his May 4 telephone conversation with Lamarche, Lamarche told Brunelle that after the March 23 interview, Lamarche spoke with one of the FBI agents involved in the Aguilar case and Lamarche informed the FBI agent that he had been interviewed by Brunelle (or a defense investigator). Brunelle's declaration also states that on May 4, Lamarche told Brunelle that the FBI agent was furious with him for speaking with a defense investigator.

3. During my contacts with Lamarche, I never expressed "fury" or anger towards him. In addition, I only spoke with Lamarche prior to March 23. At no time, not prior to March 23 or after March 23, did I ever tell Lamarche or suggest to him that he should not speak with the defense.

4. I declare under penalty of perjury under the laws of

the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 4th day of September, 2011, at Los Angeles, California.



FARRELL BINDER

DECLARATION OF CARLOS NARRO

I, Carlos Narro, hereby declare as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"); I was involved in the case of United States v. Aguilar, et al., CR 10-1031(A)-AHM; and had some contact with Jean Guy Lamarche during the prosecution of the Aguilar matter.

2. I have been informed that Alain Brunelle, a defense investigator, has filed a declaration in the Aguilar case in which he states that he interviewed Jean Guy Lamarche in person on March 23, 2011, and also spoke with Lamarche by telephone on May 4, 2011. According to Brunelle's declaration, during his May 4 telephone conversation with Lamarche, Lamarche told Brunelle that after the March 23 interview, Lamarche spoke with one of the FBI agents involved in the Aguilar case and Lamarche informed the FBI agent that he had been interviewed by Brunelle (or a defense investigator). Brunelle's declaration also states that on May 4, Lamarche told Brunelle that the FBI agent was furious with him for speaking with a defense investigator.

3. In March 2011, I was asked to contact Lamarche because he suddenly stopped answering calls and e-mails, even though he had been cooperating with the investigation and had previously flown to Los Angeles to be interviewed by case agents and prosecutors. I was specifically asked to speak with Lamarche because I speak Spanish, as did Lamarche and his wife. Lamarche's wife's primary

language was Spanish.

4. I contacted Lamarche on March 26, 2011. During this conversation, Lamarche stated he did not wish to travel to Los Angeles to testify because he was afraid and because his wife was recently hospitalized and was under medication due to stress caused by the Lindsey case. Lamarche explained that he and his wife recently began to see cars drive by his street which he did not recognize. Shortly after Lamarche spoke to Special Agent (SA) Farrell Binder, approximately one month prior to our conversation, a black Ford pickup truck parked next to his house and there was a white male in the driver's seat who appeared to be hiding himself. Lamarche explained that as his wife walked towards the vehicle, the white male, who was wearing a knit cap, pulled the cap down to cover his face and drove away. In addition, he said his wife had recently received a telephone call from Mexico and when she answered the phone, the caller hung up. They believed the call came from Mexico because a caller id feature indicated it was a Mexican telephone number.


5. Lamarche also explained to me that he was recently visited by two private investigators, a male and a female, who were from an investigative agency in Canada. Lamarche said the male and female introduced themselves as investigators. He asked if they were associated with the FBI case in the U.S. and they responded yes. He thought they were associated with the FBI. Lamarche told me that after answering a few questions, Lamarche

realized they were private investigators associated with Lindsey Manufacturing and not the FBI. He then stopped speaking with the investigators. Lamarche indicated the visit by the private investigators scared him and his wife because Lamarche's whereabouts could be discovered. Lamarche explained that this, combined with the other events he had mentioned and his history with Enrique Aguilar in Mexico, scared his wife very much. He added that his wife was recently hospitalized and is currently taking medication. Lamarche said he and his wife were planning to move to a new location because they were afraid.

6. Lamarche concluded our conversation by indicating his willingness to review documents and by agreeing to speak with the FBI again later that day. During my conversation with Lamarche, he advised me that his preferred language was French. I then arranged for a French speaking agent to continue the dialogue with Lamarche.

7. During my contacts with Lamarche, I never expressed "fury" or anger towards him. In fact, the purpose of my conversation with Lamarche was to calm his fears about testifying. In addition, I never told Lamarche or suggested to him that he should not speak with the defense. His speaking to defense investigators was not a concern of mine because witnesses have often talked to defense investigators in cases I have investigated.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 2nd day of September, 2011, at Los Angeles, California.

 9/2/2011

CARLOS NARRO

DECLARATION OF SUSAN GUERNSEY

I, Susan Guernsey, hereby declare as follows:

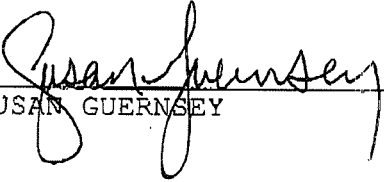
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3. The only time I had limited contact with Lamarche was on December 21, 2010, months before he was interviewed by the defense investigators on March 23, 2011. I never expressed "fury" or anger towards him. In addition, I never told Lamarche or suggested to him that he should not speak with the defense.

4. I declare under penalty of perjury under the laws of

the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 4 day of September, 2011, at Los Angeles, California.


SUSAN GUERNSEY