

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Keith Raniere,

Plaintiff,

vs.

Merrick Garland, US Attorney General, et
al.,

Defendants.

No. 22-cv-00212-RCC-PSOT

**SECOND DECLARATION OF
DANIEL FLORES**

I, Daniel Flores, pursuant to 28 U.S.C. § 1746, and based upon my personal knowledge and information made known to me from official records reasonably relied upon by me in the course of my employment, hereby make the following declaration relating to the above-titled matter. All records attached to this declaration are true and accurate copies of Bureau records maintained in the ordinary course of business.

1. As a supplement to my prior declaration (Doc. 14-2), to date, Mr. Raniere's attorneys still have not requested that Suneel Chakravorty be granted paralegal privileges, nor have they sponsored him as a paralegal. Therefore, Suneel Chakravorty is not afforded legal visitation, legal call, or legal correspondence privileges with Mr. Raniere.

I. LEGAL CALLS

2. Since May 27, 2022, the last date identified in my prior declaration when a legal call was requested/accommodated, I have scheduled and facilitated two legal telephone calls between Mr. Raniere and his attorneys. *See* Att. 1, Legal Call Log I (Redacted) at 2. The below table identifies both legal telephone calls that I have personally scheduled/accommodated since May 27, 2022:

Date	Attorney Names	Approximate Duration
6/1/2021	Joseph P. Daugherty	1 hr.
	Gregory Stoltz	1 hr.

3. Since May 27, 2022, an additional three legal calls have been accommodated by Counselor Ashworth when I was not available. *See* Att. 2, Legal Call Log II (Redacted) at 1-2. As reflected in the below table, since May 27, 2022, Counselor Ashworth has accommodated the following legal calls for Mr. Raniere:

Date	Attorney Name(s) ¹	Approximate Duration
6/7/2022	Joseph P. Daugherty	2 hrs.
6/8/2022	Joseph Tully	2 hrs.
6/10/2022	Joseph P. Daugherty	2 hrs.

II. LEGAL VISITS

4. Mr. Raniere's attorneys continue to schedule, through me and other substitute Correctional Counselors, frequent legal visits. These visits have been accommodated per the request of the attorney and in line with the schedule of the institution and any institutional security/safety measures (e.g., lockdown, COVID-19 protocols, etc.).

5. Since May 19, 2022, Mr. Raniere's legal visits have been accommodated as reflected in the following table, including three that have been requested and scheduled for this week:

Date	Attorney Name(s)	Approximate Duration
5/19/2022	Gregory Stoltz	2.5 hrs.
5/23/2022	Gregory Stoltz	> 1 hr.
5/25/2022	Gregory Stoltz	> 1 hr.
5/31/2022	Gregory Stoltz	> 1 hr.

¹ As with the previous declaration, the attorney names are not specifically identified on Counselor Ashworth's legal call log, but I was able to cross-reference the telephone numbers to identify the attorney.

1	6/6/2022	Stacy Scheff	1.5 hrs.
2	6/9/2022 ²	Gregory Stoltz	2.5 hrs.
3	6/14/2022	Gregory Stoltz	TBD
4	6/16/2022	Gregory Stoltz	TBD
5	6/17/2022	Gregory Stoltz	TBD

6. In addition to these legal calls and legal visits, Mr. Raniere is still able to send and receive legal correspondence at USP Tucson to/from his attorneys that is afforded confidential processing/handling.

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² On June 6, 2022, in requesting additional legal visits for Gregory Stoltz, Joseph M. Tully informed me via e-mail that he was “working on motions that are due on June 19 – 13 days away. I need to get Mr. Raniere’s input on some parts of the motions in order to complete them. I am working closely with Mr. Stoltz – essentially he is my eyes and ears in being able to meet with Mr. Raniere in person to go over pending motions.” *See* Att. 3, Tully E-Mail (Redacted) at 1. Mr. Tully requested that I “please accommodate Mr. Stoltz meeting with Mr. Raniere . . . as it is necessary for us finalizing the motion.” *Id.*

1 Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury
2 that the foregoing is true and correct to the best of my information, knowledge, and belief.

3 Executed on this 14th day of June 2022, in Tucson, Arizona.

4 

5 Daniel Flores
6 Correctional Counselor
7 USP Tucson, Arizona
8 Federal Bureau of Prisons

8 **Enclosures**

9 Att. 1, Legal Call Log I (Redacted)

10 Att. 2, Legal Call Log II (Redacted)

11 Att. 3, Tully E-Mail (Redacted)

Exhibit A

Attachment 1

Legal Call Log

Date	IM Name/Reg. No. RANIERE, Reg. No. 57005-177 Attorney Name/Number	Call Duration	Staff
10/04/2021	Joseph P. Daugherty [REDACTED]	1.5 hr.	D. Flores CCC
10/07/2021	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC
10/11/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
10/14/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
10/20/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
10/27/2021	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC
11/01/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
11/09/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
11/15/2021	Paul DerOhannesian [REDACTED]	1hr.	D. Flores CCC
11/16/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
12/01/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
12/08/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
12/15/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
12/15/2021	Seema Iyer, Esq. [REDACTED]	1hr.	D. Flores CCC
12/20/2021	Joseph Tully [REDACTED]	1hr.	D. Flores CCC
12/21/2021	Seema Iyer, Esq. [REDACTED]	1hr.	D. Flores CCC
02/22/2022	Duncan Levin, Esq. [REDACTED]	30 min.	D. Flores CCC
02/23/2022	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC

Legal Call Log

02/28/2022	Arangullo [REDACTED]	1hr.	D. Flores CCC
03/01/2022	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC
03/08/2022	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC
03/09/2022	John Meringolo [REDACTED]	1 hr.	D. Flores CCC
03/29/2022	Joseph Tully [REDACTED]	1 hr.	D. Flores CCC
4/25/2022	Gregory Stoltz [REDACTED]	1hr.	D. Flores
4/26/2022	John Meringolo [REDACTED] Gregory Stoltz [REDACTED]	1hr. 1hr.	D. Flores
4/27/2022	Duncan Levin [REDACTED]	1hr.	D. Flores
5/04/2022	Joseph Tully [REDACTED]	1hr.	D. Flores
5/09/2022	John Meringolo [REDACTED]	1 hr.	D. Flores
5/10/2022	Joseph Tully [REDACTED]	1 hr.	D. Flores
5/24/2022	Joseph P. Daugherty [REDACTED]	1hr.	D. Flores
5/25/2022	Joseph Tully [REDACTED]	1hr.	D. Flores
6/1/2022	Joseph P. Daugherty [REDACTED] Gregory Stoltz [REDACTED]	1hr. 1hr.	D.Flores

Legal Call Log

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Exhibit A

Attachment 2

Phone log:

Date	Inmate Name & #	Phone #	got thru	I/M sign	Length	Staff
4-15-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
4-22-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
4-28-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
4-29-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
5-10-22						
5-11-22						
5-11-22						
5-12-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
5-18-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
5-20-22	Raniero 57005-177		yes	KAR	1hr.	Ashworth / EB
5-25-22						
5-26-22						
5-27-22	Raniero 57005-177		yes	KAR	2hr.	Ashworth / EB
6-2-22						
6-7-22	Raniero 57005-177		yes	KAR	2hr.	Ashworth / EB
6-8-22	Raniero 57005-177		yes	KAR	2hr.	Ashworth / EB

[illegible]

Exhibit A

Attachment 3

[EXTERNAL] RE: [EXTERNAL] Re: [EXTERNAL] Re: [EXTERNAL] Re: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

Joseph Tully <[REDACTED].com>

Mon 6/6/2022 3:11 PM

To: Flores, Daniel (BOP) <[REDACTED].gov>; Gregory Stoltz <[REDACTED].com>

Cc: Ashworth, Thomas (BOP) <[REDACTED].gov>; Cook, Clay (BOP) <[REDACTED].gov>; Stacy Scheff <[REDACTED].com>

Counselors Flores & Ashworth,

For more background, I am working on motions that are due on June 19 – 13 days away. I need to get Mr. Raniere's input on some parts of the motions in order to complete them. I am working closely with Mr. Stoltz – essentially he is my eyes and ears in being able to meet with Mr. Raniere in person to go over the pending motions.

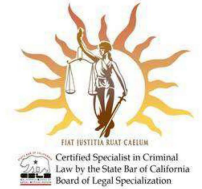
Neither Mr. Stoltz nor myself mean to overburden you with needless requests, however, if you or Counselor Ashworth can please accommodate Mr. Stoltz meeting with Mr. Raniere, it will be greatly appreciated as it is necessary for us finalizing the motion. I promise you that these requests will level off after June 19.

Thank you so much.

Very truly yours,

Joseph M. Tully

Joseph M. Tully
Tully & Weiss Attorneys at Law
Certified Specialist, Criminal Law



Bay Area:

713 Main St., Martinez, CA 94553, (925) 229-9700
395 West Portal, San Francisco, CA 94127, (415) 360-9007

Central Valley:

1340 Van Ness, Fresno, CA 93721, (559) 321-0907
1916 E. Front St., Selma, CA 93662, (559) 860-0970

Northern California:

1388 Court St., Ste. G, Redding, CA 96001, (530) 999-9700

Southern California:

220 S. Pacific Coast Hwy, Ste. 106, Redondo Beach, CA 90277 (424) 383-9700

Toll Free: (844) 788-9700 (All Branches)

Text msg: (844) 788-9700 (All Branches)

Fax: (925) 231-7754 (All Branches)

From: Flores, Daniel (BOP) <[REDACTED].gov>

Sent: Monday, June 6, 2022 9:09 AM

To: Gregory Stoltz <[REDACTED].com>

Cc: Cook, Clay (BOP) <[REDACTED].gov>; Ashworth, Thomas (BOP) <[REDACTED].gov>; Stacy Scheff <[REDACTED].com>; Joseph Tully <[REDACTED].com>

Subject: Re: [EXTERNAL] Re: [EXTERNAL] Re: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

I will forward your request to Mr. Asworth to see what will work for him.

From: Gregory Stoltz <[REDACTED].com>

Sent: Monday, June 6, 2022 8:53 AM

To: Flores, Daniel (BOP) <[REDACTED].gov>

Cc: Cook, Clay (BOP) <[REDACTED].gov>; Ashworth, Thomas (BOP) <[REDACTED].gov>; Stacy Scheff <[REDACTED].com>; Joseph Tully <[REDACTED].com>

Subject: [EXTERNAL] Re: [EXTERNAL] Re: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

Mr. Flores, I'm sorry but I can't wait until next week - our motions are due on the 19th and I need to discuss them with the client. Do you have any time available this week? I am willing to try to move my other hearings around to make it work.

Cheers,
Greg Stoltz, Esq.
530 S. Main Ave. Ste B
Tucson, AZ 85701
[REDACTED]
[REDACTED].com

On Mon, Jun 6, 2022 at 8:34 AM Flores, Daniel (BOP) <[REDACTED].gov> wrote:

Mr. Stoltz, can we please schedule your visit the week of 6/13? I will be on vacation this week and counselor Ashworth has other duties that were scheduled prior. Thank you for your understanding.

From: Gregory Stoltz <[REDACTED].com>

Sent: Monday, June 6, 2022 8:26 AM

To: Cook, Clay (BOP) <[REDACTED].gov>; Ashworth, Thomas (BOP) <[REDACTED].gov>; Flores, Daniel (BOP) <[REDACTED].gov>

Subject: [EXTERNAL] Re: [EXTERNAL] Re: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

Good morning, can I please have a visit on Thursday?

Cheers,
Greg Stoltz, Esq.
530 S. Main Ave. Ste B
Tucson, AZ 85701
[REDACTED]

On Thu, Jun 2, 2022 at 1:06 PM Gregory Stoltz <[REDACTED].com> wrote:

I can visit Mr. Raniere on Thursday the 9th, if that's possible.

Regards,
Greg Stoltz

On Wed, Jun 1, 2022, 3:28 PM Gregory Stoltz <[REDACTED].com> wrote:

I wish I could, but I am in court from 10am on until 3pm on the 6th. What's the earliest you could get me in that morning? I have to be physically present with a client at 10am in downtown Tucson.

Cheers,
Greg Stoltz, Esq.
530 S. Main Ave. Ste B
Tucson, AZ 85701
[REDACTED]

On Wed, Jun 1, 2022 at 1:10 PM Flores, Daniel (BOP) <[REDACTED].gov> wrote:

How about Monday June 6th?

From: Gregory Stoltz <[REDACTED].com>
Sent: Wednesday, June 1, 2022 12:50 PM
To: Flores, Daniel (BOP) <[REDACTED].gov>
Subject: [EXTERNAL] Re: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

I am so sorry, but I can't push it off, our filing deadline is coming up on the 19th. Can I do that visit with Counselor Ashworth?

Cheers,
Greg Stoltz, Esq.
530 S. Main Ave. Ste B
Tucson, AZ 85701
[REDACTED]

On Wed, Jun 1, 2022 at 12:48 PM Flores, Daniel (BOP) <[REDACTED].gov> wrote:

Please be advised, I will be on vacation from 6/7 till 6/10, can we schedule your visit the following week?

From: Gregory Stoltz <[REDACTED].com>
Sent: Wednesday, June 1, 2022 12:42 PM
To: Ashworth, Thomas (BOP) <[REDACTED].gov>; Flores, Daniel (BOP) <[REDACTED].gov>
Cc: Cook, Clay (BOP) <[REDACTED].gov>
Subject: [EXTERNAL] Visit request for Keith Raniere on 6-7-22

May I please schedule a visit with Mr. Raniere on Tuesday June 7th at 11am?

Cheers,
Greg Stoltz, Esq.
530 S. Main Ave. Ste B
Tucson, AZ 85701
[REDACTED]