

# Operation Longhorn

Violations of Texas Penal Code by Government Employees & Private  
Individuals in the state of Texas.

House Managers

**EX. 152**

## Search Warrants Executed in August 2019

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There were 3 search warrants that were executed simultaneously at 9:00am on Wednesday, August 14, 2019 in Austin, Texas. Copies of the actual search warrants were not given to any of the parties present at any of the 3 search locations, and no copy of the search warrant was left behind after the completion of the searches.

The only way copies of the search warrants were received were by emails from AUSA Alan Bui to counsels.

Since the search warrants were sent as PDF files via email after the searches, we were able to analyze the metadata of the PDF documents that were emailed.

According to the filings with the court in the Western District of Texas, each of these search warrants was signed and issued by Magistrate Judge Mark Lane at 10:00am on Monday, August 12, 2019.

## Search Warrant Produced on 9/6/2019 for Contego

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Below is pertinent info we discovered through a forensic analysis of the metadata in the PDF documents emailed by AUSA Alan Bui to counsels, Chuck Meadows and Aaron Borden on September 6, 2019.

Based on the search warrant produced, the search warrant was signed by Magistrate Judge Mark Lane on August 16, 2019 at 1:30pm.

1:19-MJ-450; "Contego"; 2112 Rutland Dr, #141, Austin, Texas 78758, Case No. 1:19-MJ-450; issued August 16, 2019;

- Created 9/6/2019 at 11:24:08 AM
- Modified: 9/6/2019 11:31:41 AM
- Title: Partial Unseal Order.pdf
- Author: ABui
- Application: PScript5.dll Version 5.2.2
- PDF Producer: Acrobat Distiller 15.0 (Windows)

*8-16-2019*  
*8-27-2019*  
*8-30-2019*  
*delivered to add, turn /*  
*Bates*

## Search Warrants Executed in August 2019 – Document Metadata

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Below is pertinent info we discovered through a forensic analysis of the metadata in the PDF documents emailed by AUSA Alan Bure to counsels.

- 1:19-MJ-431(1): The "World Class Corporate Offices": World Class Offices, 303 and 307/305 West Ninth Street and 814 West Lavaca Street, Austin, Texas 78701; Case No. 1:19-MJ-431(1); issued August 12, 2019;
  - Created on 8/14/2019 at 11:31:03 AM
  - PDF Producer: Aspose.PDF for .NET 18.4
- 1:19-MJ-431(2): The "Server Location": 322 Congress Avenue, 2d Floor, Austin, Texas 78701; Case No. 1:19-MJ-431(2); issued August 12, 2019
  - PDF was attached to an email from AUSA Alan Bure to Gerry Morris sent at 8:29 PM on August 15, 2019
  - Created on 8/14/2019 at 11:39:56 AM
  - Modified on 8/14/2019 at 11:58:04 AM
  - PDF Producer: iText 2.1.7 by IT3XT

## Search Warrants Executed in August 2019 - Document Metadata (cont.)

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- 1:19-MJ-431(3): The "Paul Residence": [REDACTED] Case No. 1:19-MJ-431(3): issued August 12, 2019;
  - PDF was attached to an email from AUSA Alan Bule to Aaron Borden and Chuck Meadows sent at 5:57pm on August 14, 2019
  - Created on 8/14/2019 at 11:11:46 AM
  - Title: A9R1s3ywag\_1anx5s7\_53c.tmp
  - Author: ABule
  - Application: PScript5.dll Version 5.2.2
  - PDF Producer: Acrobat Distiller 15.0 (Windows)

## Key Discussion Points

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- Search warrant returns and inventories signed by Rani Sabban contain false statements for all 4 of the executed search warrants.
- Kevin Knebel sworn testimony under oath contradicts the government's filings for the search warrant, return, and inventories.
- Grand Jury Subpoena served on Kevin Knebel by Alan Bure date irregularities.
- [REDACTED] use of personal cell phone in all communications with Kevin Knebel re: Contego search.
- Contego phone records show extensive communication after the searches to coordinate stories between Joy, [REDACTED] and Kevin Knebel.

## Western District of Texas - Orders and Docket Irregularities

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- There are many inexplicable changes that were made to the docket by [REDACTED] that are atypical and do not follow the normal path.
- These changes to the docket call in to question manipulation of documents and filings.
- Irregularities in the signatures by Magistrate Judge Lane for Orders signed.
- Wrong documents given to Gerry Morris on 10/21/2019 and Michael Wynne on 2/28/2020.
- Documents provided by Court on 10/21/2019 did not have PACER numbers atop the header, which is inconsistent with documents filed by the Court and printed from their system.

CONFIDENTIAL

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## Individuals of Interest

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- [REDACTED] – Texas State Securities Board; FBI Task Force Officer
- [REDACTED] – FBI
- [REDACTED] – Courtroom Deputy to Magistrate Judge Mark Lane
- Alan Bure – AUSA with DOJ
- Neeraj Gupta – AUSA with DOJ
- Kevin Knobel – CEO of Contego Information Management



[REDACTED]

Financial Examiner at the Texas State Securities Board ("TSSB")  
FBI Task Force Officer

- DOB: [REDACTED] Age: 36
- [REDACTED]
- Cell phone: [REDACTED]
- Cell phone: [REDACTED]

Before joining the TSSB, [REDACTED] was a loss prevention officer at Wal-Mart in Pasadena, Texas for approximately five years. This is the sum of his law enforcement experience and training. He was tasked with being the sole law enforcement applicant on the search warrant applications, and he alone executed the certification of all of the search warrant inventories, though he only participated physically in one search. From all appearance, he was in charge of the search at the Paul Residence.

[REDACTED]

FBI Special Agent, Austin, Texas. Previously stationed in Del Rio, Texas

- DOB: [REDACTED] Age: 51
- [REDACTED] 668 Starbuck Dntwood Texas 78619
- Cell phone: [REDACTED] 921-529-1416

As described in detail below, [REDACTED] played a critical role as the only agent involved in the search and seizure at the Contego offsite storage facility to which World Class entrusted its private information. The search warrant returns and inventories also indicate that he witnessed the preparation of two of the three inventories of the searches on August 14, 2019.

**Veronica Sobrevilla Dent**

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Courtroom Deputy to U.S. Magistrate Judge Mark Patrick Lane

- DOB: [REDACTED] Age: 40
- Street address unknown, Hutto, Texas
- Originally from Del Rio, Texas

[REDACTED] appears to have made the entries in the District Clerk's electronic system or facilitated them or otherwise knowingly allowed those entries to be made. Her initials appear on several of the docket entries, many which are inconsistent with the initials of the file stamp for the same respective documents.

Alan Buie

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Assistant United States Attorney with Office of the U.S. Attorney for the Western District of Texas, Austin Division,

- Previously stationed in Fort Worth, Texas with the USAO for the NDTX
- DOB: [REDACTED] Age: 54
- [REDACTED]

Although repeated representations have been made that AUSA Neeraj Gupta has been primarily in charge of the investigation, Buie has been the touchpoint for all communications and has taken the lead at every meaningful turn.

## Neeraj Gupta

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Assistant United States Attorney with Office of the U.S. Attorney for the Western District of Texas, Austin  
Division.

AUSA Neeraj Gupta works with AUSA Alan Bure and has been said to be the primary AUSA on the matters regarding the search warrants that were executed.

## Kevin Knebel

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Kevin Knebel is the CEO of Contego Information Management. Contego Information Management is an off-site file storage provider.

Kevin W. Knebel, CEO, Contego HIM, Inc.

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