

CLAIM FOR DAMAGE, INJURY, OR DEATH		INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.		FORM APPROVED OMB NO. 1105-0008	
1. Submit to Appropriate Federal Agency: FTCA Section, Torts Branch, Civil Division U.S. Department of Justice P.O. Box 888 Benjamin Franklin Station Washington, DC 20044			2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. Tara Reade c/o Jonathan Levy, Esq. Unit 7810, PO Box 6945, London, W1A 6US UK info@jlevy.co +44 (0) 20 8144 2479		
3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN	4. DATE OF BIRTH	5. MARITAL STATUS single	6. DATE AND DAY OF ACCIDENT 11/26/2023	7. TIME (A.M. OR P.M.) na	
8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). See attachment					
9. PROPERTY DAMAGE					
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). None					
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side). See attachment					
10. PERSONAL INJURY/WRONGFUL DEATH					
STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. see attachment					
11. WITNESSES					
NAME		ADDRESS (Number, Street, City, State, and Zip Code)			
see attachment		see attachment			
12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars)					
12a. PROPERTY DAMAGE	12b. PERSONAL INJURY 10000000	12c. WRONGFUL DEATH	12d. TOTAL (Failure to specify may cause forfeiture of your rights). 10000000		
I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.					
13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).			13b. PHONE NUMBER OF PERSON SIGNING FORM +44 (0) 20 8144 2479	14. DATE OF SIGNATURE 11/27/2023	
<input checked="" type="checkbox"/> CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).			CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)		

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident insurance? Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? Yes No 17. If deductible, state amount.

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

19. Do you carry public liability and property damage insurance? Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). No

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

- (a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.
- (b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.
- (c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.
- (d) **Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.**

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

- A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

- B. **Principal Purpose:** The information requested is to be used in evaluating claims.
- C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.
- D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is **solely** for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

ATTACHMENT TO STANDARD FORM 95

Introduction

Tara Reade was sexually victimized by then Senator Joseph Biden in 1993. Her case was suppressed by Congressional investigators to protect Senator Biden. When she spoke out again, she was subject to an ongoing FBI Operation detailed below to revictimize her a second time.

Claimant Tara Reade is the target of “**Operation Cassandra**”¹ and brings this claim for damages against the FBI, the Director of the FBI, **Christopher Wray**, NCA1 Supervisory Senior Resident Agent, **Andrew D. Forristel**; Special Agent, **Michael Catalano**; and Does I-XX who are agents of the Federal Bureau of Investigation and United States Department of Justice, whose identities are not yet known to Claimant, who authorized, directed, and actively monitored and participated in the actions alleged herein in order to engage in surveillance of the Claimant, seizure of her property, harassment, intimidation, coercion, invasion of privacy and other tortious and unconstitutional activities.

As a result of the actions carried out in furtherance of Operation Cassandra by the respondent FBI et al., Claimant has suffered severe emotional distress and anxiety, was subjected to death threats, was unlawfully surveilled and had her communications and financial records seized and recorded and was forced to apply for asylum to a third country in credible fear of her life and liberty. These actions by the FBI and its agents constitute the following torts:

Violation of the Fourth Amendment under Bivens; 28 U.S.C. § 1331 through the unconstitutional surveillance, search, and seizure that Claimant has been subjected to through FBI Operation Cassandra.

Violation of the Foreign Intelligence Surveillance Act, 50 U.S.C. § 1810 through the unlawful electronic surveillance of Claimant by and through FBI Operation Cassandra.

Violations of state law for invasion of privacy under Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671 et seq. in that Forristel and Catalano were employees of the United States, acting in the scope of their employment through their own actions and their directions to employees and agents, under circumstances that would render the United States (FBI), if a private person, liable for damages that their actions of unlawful surveillance, search, seizure, and threats caused Claimant under Oregon, Washington and California law. The United States is therefore liable to Claimant, as follows, pursuant to 28 U.S.C. §§ 1346(b) and 2674 for:

¹ The FBI Director unlawfully and unconstitutionally ordered a special operation, the codename currently unknown but which we will refer to herein as “Operation Cassandra,” against Claimant who during all times relevant was a resident of California (2019-2021), Oregon (2021-2023) and Washington (2023) in order to retaliate, intimidate, discredit and if possible, eliminate her as a threat to President Biden. “Cassandra” a priestess of Athena was cursed by Apollo for spurning his sexual advances, not to be believed even though she spoke the truth. Having truly predicted the fall of Troy and not believed, she was then revictimized by Ajax. Like Cassandra, Tara Reade has been victimized not only by rapist Joseph Biden but by the United States in the form of an FBI operation.

(a) The tort of Invasion of Privacy under California, Washington and Oregon law in that the FBI (the United States), if a private person, would be liable to Claimant for invasion of privacy under state law. The FBI actions in conducting audio and video surveillance of Claimant, through Catalano and Operation Cassandra, in situations in which Claimant had a reasonable expectation of privacy, constitute intrusions into a private place or matter in a manner highly offensive to a reasonable person.

(b) The United States, if a private person, would be liable to Claimant for violations of the California constitutional right of privacy set forth in Article 1, section 1 of the California constitution and the Washington constitutional right to be free of unlawful invasion of home and private affairs under Article I, section 7 of the Washington constitution. The FBI's unlawful conduct in conducting audio, Internet, signal and video surveillance of Claimant through Operation Cassandra in situations in which Claimant had a reasonable expectation of privacy in her home, private affairs and person, and the FBI in compiling and maintaining information on Claimant based solely on her whistleblowing activities amounts to a serious invasion of her state constitutional rights to privacy.

(c) The United States acting through the FBI, if a private person, would be liable to Claimant for violations of California Civil Code section 52.1. By subjecting Claimant to constant surveillance because of her whistleblowing activities and conducting a campaign of threats, intimidation, and false prosecution the FBI has interfered, or attempted to interfere, by threats, intimidation, or coercion with the exercise or enjoyment by Claimant of her rights to speech under the First Amendment of the U.S. Constitution and the California Constitution Article I Section 2 and the right to be free from police searches or seizures that are unreasonable under the Fourth Amendment to the U.S. Constitution, in violation of California Civil Code § 52.1.

(d) The United States acting through the FBI, if a private person, would be liable to Claimant for violations of California Civil Code § 51.7 in that Claimant was subjected to threats, intimidation, and coercion due to her perceived political views through the lens of the Russia collusion hoax as an opponent of President Biden and supporter of Russia and due to her actual status as a female survivor of sexual assault.

(e) The United States acting through the FBI, if a private person, would be liable to Claimant for the intentional infliction of emotional distress under the state laws of California, Oregon, and Washington. The FBI and its agents' acts constitute extreme and outrageous conduct, in which they engaged with the intention of causing, or a reckless disregard for the probability of causing, emotional distress to the Claimant; which was the actual or proximate cause of severe or extreme emotional distress that Claimant has suffered.

Summary of FBI Operation "Cassandra" April 2019 to November 2023

Tara Reade, hereafter the "Claimant" or "Tara," was the victim of a violent sexual assault by President (then Senator) Joseph Biden in 1993. Tara timely reported the sexual assault to the Congressional authorities in 1993. Beginning in April 2019 and thereafter Tara emerged as a whistleblower by relating the painful details of the sexual assault by President Biden. She was not

an agent or associate of the 2019 Democratic presidential candidate Biden's opponent President Donald Trump nor associated with any foreign power.

The Claimant makes the following statements from her own knowledge except as to those matters involving "Operation Cassandra" that are made on information and belief and which Claimant contends will be verified by her Operation Cassandra records now in the custody of the FBI and Department of Justice and collateral records at Twitter (now X), the Monterey County District Attorney's Office, Antioch University, Department of Homeland Security, Department of Justice and National Security Agency.

Since 2016 with the inception of Operation Crossfire Hurricane the FBI has expended much of its effort on broad investigations of President Donald Trump, and his supporters "colluding" with the Russian government or its agents against the interests of the faction of the US government aligned with the Democratic Party. In 2019 with the candidacy of Joseph Biden for president, FBI investigations broadened to further include proponents of the prosecution of Joseph Biden, James Biden and Hunter Biden for various criminal activities and again after the commencement of the Ukraine Special Operation in February 2022 to include alleged agents of the Russian government and opponents of transfers of billions of dollars of government funds and arms to the Ukraine government.

The FBI Director unlawfully and unconstitutionally ordered a special operation, the codename currently unknown but which we will refer to herein as "**Operation Cassandra**," against Claimant who during all times relevant was a resident of California (2019-2021), Oregon (2021-2023) and Washington (2023) in order to retaliate, intimidate, discredit and if possible, eliminate her as a threat to President Biden. The secret FBI operation violated privacy and surveillance statutes and engaged in unconstitutional searches and seizures under the 4th Amendment and ultimately forced Tara to seek asylum in a third country in fear of her life and liberty after finally realizing she was the target of an unlawful and FBI operation. ordered by the Director of the FBI, Christopher Wray, and carried out by NCA1 Supervisory Senior Resident Agent, Andrew D. Forristel; Special Agent, Michael Catalano; and Does I-XX are agents of the Federal Bureau of Investigation and United States Department of Justice, whose identities are not yet known to Claimant, who authorized, directed, and actively monitored and participated in the actions alleged herein in order to engage in surveillance of the Claimant, seizure of her property and other unlawful and unconstitutional activities of the Special Operation.

Particulars

In 1992-1993 Tara was employed as a staff assistant by then Senator Joseph Biden in Washington DC. She previously worked as an intern for Congressman Leon Panetta. The employment with Senator Biden culminated in sexual harassment and a violent sexual assault of Tara by Senator Biden which was timely reported to the Congressional personnel office by Tara, she also told her mother and a friend of the assault. Her mother contacted well known news personality Larry King during a call in segment (<https://youtu.be/bBTwwOHV6vQ>). Tara also alluded to the assault several times over the years to close, personal friends.

In April 2019 Tara Reade and at least seven other women came forward with allegations of sexual abuse and inappropriate behavior by then presidential candidate Joseph Biden. Tara's allegations were the only allegations of sexual abuse against Mr. Biden corroborated by a contemporaneous reporting event. President Biden (then a candidate for president) finally denied the allegation in 2020.

The Federal Bureau of Investigation and its Sacramento, California office in 2019 began an ongoing operation against Tara in order to silence and surveil her and if possible, falsely arrest her for criminal activities. The FBI is supposed to be a nonpartisan federal law enforcement agency but from 2019 to present has engaged in political activities to protect Joseph Biden and his family from allegations of criminality and to implicate former President Trump for various crimes and if possible, continue the long standing Russian collusion hoax and narrative initiated by the FBI at in support of presidential candidate Hillary Clinton in 2016 dubbed Operation Crossfire Hurricane.

Tara had no connection to the Trump political campaign or the Russian government at the time she came forward with her information about the 1993 violent sexual by Joseph Biden in 2019. The FBI Director nonetheless opened Operation Cassandra targeting Tara to unlawfully harass, surveil, intimidate, seize information and property and if possible, arrest her.

The first priority of Operation Cassandra was to demonize Tara in the press. The FBI utilized its media connections developed during Operation Crossfire Hurricane to quickly achieve results.

Tara immediately came under attack in the press as a "Russian agent." There was no credible information to support this allegation. However, seizing on an unrelated post from 2018 in Tara's personal blog related to the Ukraine Russia conflict, the FBI directed the media to unleash an attack on Tara as a possible Russian agent. The press was directed by the FBI to contact individuals who might have personal grievances against Tara as well. This included publishing unfounded accusations of animal charity fraud by a Democratic Party operative and digging up former creditors and landlords who after being prompted accused her of being a manipulative grifter and deadbeat who used multiple names.

The FBI however suppressed the fact that Tara as a divorced single mother and survivor of domestic violence had obtained a law degree while under a domestic violence protection order. Tara had then gone on to pursue a career as a domestic violence advocate and an animal welfare volunteer.

In May 2020 after the issue of the sexual assault by President Biden again surfaced in the press, Tara became the subject of email and social media death threats. Her personal website and emails were hacked by the FBI. Tara not knowing that FBI was behind the threats and hacking, reported the matter to the FBI. FBI SSRA Andrew "Andy" Forristel contacted Tara told her that Special Agent Catalano would be her point of contact. Special Agent Catalano requested Tara report to his office, without revealing the FBI's involvement in Operation Cassandra or that Tara was their target. When Tara reported to the FBI office, Special Agent Catalano and two other FBI agents asked Tara to surrender her laptop and cell phone for examination. She did so with no idea she was the target of a FBI investigation and waited three hours while the FBI examined, copied, and placed spy ware on the devices.

Between May and November 2020 Operation Cassandra caused the Monterey County, California, District Attorney to open a felony perjury investigation of Tara which was duly reported to the press. The alleged “crime” was that while truthfully testifying as a domestic violence advocate, Tara had allegedly perjured herself by claiming she had a bachelor’s degree from Antioch University. This somehow was equated with felony perjury, even though it was uncontroverted that Tara also possessed a law degree. Only after Tara was forced to retain counsel, the false allegations were retracted and the state criminal investigation closed.

Utilizing the planted media articles, the corrupt investigation by the Monterey County District Attorney and the testimony of the so called witnesses cited in the articles, Operation Cassandra attempted to obtain warrants from state and federal courts including FISA to wiretap, search and seize information and property from Tara. This was the same tactic used in Operation Crossfire Hurricane when the Steele Dossier planted with the media by Hillary Clinton and the FBI was used to obtain a FISA warrant against the Trump campaign. Tara’s communications: phone, wireless, Internet, social media, email were surveilled as was her person and her daughter with who she maintained a close relationship. The active surveillance did not cease until Tara removed herself from the United States in Spring 2023 and her accounts continue to be monitored including communications with her lawyer and daughter.

In 2020, unknown to Tara, she became the target of a federal Grand Jury sitting in Sacramento, California. The Grand Jury subpoenaed Tara’s social media, phone, cell, email, postal and internet records. Her banking and financial records were also probed. Tara only discovered she was the target of a Grand Jury when the FBI leaked that information to her via its relationship with Twitter *infra* in order to further intimidate her. Tara was given the impression that Twitter was resisting the Grand Jury subpoena when in fact the FBI and Twitter had a close working relationship.

In November 2020, the FBI seized a copy of the manuscript of a book Tara had written about her ordeal from a FEDEX delivery truck on the way to her publisher by overnight delivery. The manuscript was later “found” by the side of the road by an FBI operant posing as a retired Los Angeles sheriff deputy who then called Tara even though her phone number was not with the package. The “retired deputy” said he had read the manuscript including annotations Tara had made for her publisher. He called because he had “questions” about the book manuscript. The book was subsequently published in 2021 as *Left Out: When the Truth Doesn't Fit In*. (<https://a.co/d/bVyLmF5>).

In December 2020, the FBI Special Agent Catalano contacted Tara to let her know that a lawyer from Twitter would be contacting her. Unknown to Tara, Twitter and the FBI were engaged in a relationship to suppress information unfavorable to candidate Joseph Biden including information about the accused felon Hunter Biden. The FBI relationship with Twitter was so enmeshed that the FBI maintained a Twitter liaison office. Twitter’s attorney then called Tara and her legal representative and provided them a copy of a Grand Jury subpoena requesting all data on her or her accounts Twitter possessed.

In January 2021 and thereafter, Tara’s Twitter account was maliciously hacked by an FBI operant. She continued to receive harassing phone calls. A postcard of an old phone debt was sent to her

daughter's address though Tara had never lived there. Then there was an attempted break in at her daughter's residence and a sophisticated hacking of her daughter's Ring and iCloud accounts. This was reported to the local police in Seattle and the FBI.

Throughout 2021 the FBI contacted Tara on multiple occasions to confirm her whereabouts. In 2022 Tara began to work for Russia Today on a regular basis as no other employment was available to her. Sporadic online threats continued.

In 2023, Tara appeared on the Tucker Carlson show three times as interest in her persecution coincided with increased scrutiny of the FBI and IRS cover up of Hunter Biden's criminal activities and the entire Biden family's financial dealings. Tara also was a speaker at a public rally of several thousand in Washington DC. On her way to New York City hotel room from Penn Station several men in an unmarked van insisted on giving her a ride. One grabbed Tara's luggage while the other distracted her by attempting to drag her by the arm to the waiting van. Tara's daughter intervened and grabbed the luggage after she saw an FBI badge hanging on the van's rearview mirror. Tara's daughter yelled, "Leave us alone!" At which point the FBI agents backed off while they flagged and entered a taxi.

In Spring of 2023 Tara was in discussions with Congress members Gaetz and Greene about testifying before the United States House Judiciary Select Subcommittee on the Weaponization of the Federal Government. Congressman Gaetz also made preliminary inquiries on how to retrieve Tara's Congressional files that corroborated her accusations of sexual abuse in 1993 by President Biden.

In April 2023, Tara received several harassing messages including one asking if she was suicidal yet.

In May 2023 just as she was getting ready to attempt yet again attempt to retrieve her Congressional personnel files, Tara boarded a plane for Russia to finalize a book related deal. Two days before a young man followed her in a car and then into the grocery store and snapped her photo and then ran away. At Seattle airport departure area an older woman grabbed her arm speaking Ukrainian or Russian. Then in English she said: "I know you are Tara Reade you speak about Russia." Tara pulled her arm away The woman then asked: "Are you going to Russia now?"

While in Moscow, Tara was tipped by former US intelligence operatives that she would be subject to arrest or detention upon her return to the United States for violations of the Foreign Agent Registration Act and that she might be harmed or worse. While Tara at first dismissed this warning as alarmist she soon began to wonder if a series of seemingly small events and encounters with persons believed to be undercover agents indicated she was under active surveillance. Upon consulting with three experts, it became apparent she was the target of an FBI Operation that began 2019.

Tara then received a message from Matt Gaetz' counsel that they wanted her to come to the Capitol on June 7, 2023 to walk with Matt Gaetz onto the floor of Senate and demand her personnel records and do a press conference. When she informed them that she was in Moscow, Congressman Gaetz stated that her life was in immediate danger and he feared for her physical safety.

Tara then made the decision to remain in Russia and leave behind her home, possessions, pets, and family. On May 30, 2023, Tara announced she was seeking Russian citizenship due to the perceived personal danger of returning to the United States. Present at the announcement were members of the Russian government and media including sanctioned individuals. A media frenzy ensued claiming Tara was a “traitor” and had “defected.” Her situation was noted at a press conference by the NSA spokesman.

Tara was subsequently granted asylum but wants to return to the United States to testify before Congress once the FBI Operation Cassandra against her ceases. However, even after she applied for asylum, the FBI tried to entice Tara back to the United States by having the same woman, the one who had denounced her as an animal welfare fraudster to the press, attempt to steal her beloved horse in Washington with false legal documents. This attempt was foiled by the stable owner and the King County Sheriff’s office which prevented the horse from being loaded into a trailer.

Claimant reserves the right to amend this tort claim to add additional claims and facts as new information is anticipated to become available.

Damages

Claimant seeks compensatory damages in the amount of \$10 million for infliction of emotional distress and anxiety and reserves the right to seek additional statutory damages as permitted by law in the event the matter is not administratively settled.

Attachments:

Grand Jury Subpoena
Email from Andrew Forristel

UNITED STATES DISTRICT COURT
for the
Eastern District of California

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Twitter, Inc.
c/o Trust & Safety - Legal Policy
1355 Market Street, Suite 900
San Francisco, CA 94103
Email: [REDACTED]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Table with 2 columns: Place (Robert T. Matsui United States Courthouse, United States Attorney's Office, 501 I Street, Suite 10-100, Sacramento, CA 95814) and Date and Time (July 9, 2020)

YOU MUST also bring with you the following documents, electronically stored information, or objects (blank if not applicable): See Attachment

Date: June 22, 2020



Keith Holland, CLERK OF COURT

[Handwritten signature of Keith Holland]

Keith Holland
Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States Attorney, or Assistant United States Attorney, who requests this subpoena, are:

Brian A. Fogerty
U.S. Attorney's Office 501 I Street, Suite 10-100 Sacramento, CA 95814

[REDACTED]

ATTACHMENT TO GRAND JURY SUBPOENA

Twitter, Inc.
c/o Trust & Safety - Legal Policy
1355 Market Street, Suite 900
San Francisco, CA 94103
Email: [REDACTED]

For the Twitter accounts identified below and the date range April 1, 2019 to present:

- @ReadeAlexandra
- @TaraMcCabe

Produce all subscriber information, including:

1. Subscriber name;
2. Address;
3. Records of session times and durations, to include attempted/failed/unauthenticated logins;
4. Length of service (including start date) and types of service utilized;
5. Telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and
6. Means and source of payment for such service (including any credit card or bank account number),

Record Format: Records are requested in electronic/digital format (i.e., data contained on a CD-ROM or DVD), however, when this is not possible paper documents can be provided.

Compliance with this subpoena can be accomplished by mailing records to:

Assistant U.S. Attorney Brian A. Fogerty
United States Attorney's Office
501 I Street, Suite 10-100
Sacramento, CA 95814

Any questions regarding this subpoena should be directed to Federal Bureau of Investigation (FBI) Special Agent [REDACTED]

TRANSMISSION LETTER

For documents requested by
Grand Jury Subpoena

June 26, 2020

United States Attorney's Office
501 I Street, Ste 10-100
Sacramento, California 95814
Telephone: [REDACTED]
Attn: Terrie Dixon

Re: *GJ Subpoena* # 2020R00417 - 006
AUSA BRIAN A. FOGERTY

Materials requested pursuant to the above grand jury subpoena:

- Are attached hereto;
- Were mailed under separate cover to the U.S. Attorney's Office on _____(date);
- Were picked up by special agent on _____(date);
- Were mailed under separate cover to a special agent on _____ (date);
- No record found;
- Other:

By: CUSTODIAN OF RECORDS

Twitter, Inc.
c/o Trust & Safety - Legal Policy
1355 Market Street, Suite 900
San Francisco, CA 94103
Email: [REDACTED]

RULE 902(11) CERTIFICATE OF RECORDS OF REGULARLY CONDUCTED ACTIVITY

1. I am an employee of

My Title is _____.

In the course of my employment, I have access to customer-related records of my employer, and I am authorized to certify these records as a custodian of records.

2. Pursuant to federal Grand Jury Subpoena # 2020R00417 - 006, my employer has produced records to the U.S. Attorney's Office for the Eastern District of California, consisting of documents relating to the account(s) or person(s) listed below.

3. Pursuant to Federal Rule of Evidence 902(11), I certify that the records produced in response to Grand Jury Subpoena # 2020R00417 - 006 :

(A) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; and

(B) Were kept in the course of my employer's regularly conducted activity; and

(C) Were made by the regularly conducted activity as a regular practice.

Under the penalties of perjury under the laws of the United States, I certify that the above is true and correct, and if called as a witness, I could competently testify thereto.

Executed on _____, at _____.

Name:
Title:

Account name(s) or number(s) for documents provided: _____

CERTIFICATE PROVIDED TO:
ATTN: BRIAN A. FOGERTY
The United States Attorney's Office
Eastern District of California
501 "I" Street, Suite 10-100
Sacramento, CA 95814

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* Twitter Inc
was received by me on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____
_____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

----- Original Message -----

On May 11, 2020, 12:25 PM, Forristel, Andrew D. (SC) (FBI) <adforristel@fbi.gov> wrote:

Ms. Reade,

Thank you for passing this along. I've assigned this matter to Special Agent Catalano. He will be reaching out to you sometime today to discuss this in more detail and setting up a time to meet in person.

I also spoke with the Undersheriff at Nevada County Sheriff's Office. She forwarded me a copy of the NCSO report and ensured that their dispatch center has your name, phone number and email address flagged appropriately so that if you do call 911 an appropriate response will be made.

Respectfully,
Andy

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