

[Government's] affidavit².” (*Id.*) The affidavit described explicit photographs and videos from DOS “slaves” as collateral (Lever Aff. ¶¶ 21-22, 47), and notes that the collateral was given to Raniere (*id.* ¶ 47) and would likely be found at 8 Hale Drive (*id.* ¶¶ 50, 51). Additionally, the Government’s complaint against Raniere—which was attached to Lever’s affidavit—alleged that Raniere collected similar nude photographs of DOS slaves in connection with sex-trafficking and forced-labor crimes. (Compl. (Dkt. 594-1 at ECF p. 41) ¶ 48).

The next day, the Government searched 8 Hale Drive (Gov’t Mem. in Opp’n to Mot. to Supp. (“Opp’n”) at 3) and seized a hard drive (the “Device”), among other items (*id.* at 2). The Government produced the Device to Raniere and his co-defendants on October 5, 2018. (Gov’t Oct. 5, 2018 Letter (Dkt. 593-2); Raniere Mem. in Supp. of Mot. to Supp. (“Raniere Mem.”) (Dkt. 580) at 3.)

On February 21, 2019,³ while searching the Device pursuant to the 8 Hale Warrant, FBI agents found the Images, *i.e.*, two digital images of a nude female whom the agents believed to be under the age of eighteen. (Second Lever Aff. ¶¶ 11-12.) The agents recognized this female as a DOS slave who they believed had sex with Raniere when she was fifteen. (*Id.* ¶¶ 9-11.) The Images’ metadata indicate that they were taken on or before November 2, 2005—a date on which the DOS slave in question was fifteen years old—and that they were taken on a camera seized from 8 Hale.⁴ (*Id.* ¶¶ 12-14.) The Images were also in a folder dated November 2, 2005. (*Id.* ¶ 13.)

² The affidavit was submitted with the Government’s application for the search warrant. (Mar. 26, 2018 Aff. of Michael Lever (Dkt. 594-1 at p. 10) (“First Lever Aff.”).)

³ In Michael Lever’s affidavit, he states that this took place on February 21, 2018. (Feb. 21, 2019 Aff. of Michael Lever (Dkt. 594-2 at p. 2) (“Second Lever Aff.”) ¶ 11.) That appears to be a typographical error; Lever meant to say 2019, not 2018.

⁴ This same camera was used to take many pictures of Raniere and his other alleged sexual partners. (Second Lever Aff. ¶ 14.)