

Jesse C. Trentadue (#4961)
8 East Broadway, Suite 200
Salt Lake City, UT 84111
Telephone: (801) 532-7300
Facsimile: (801) 532-7355
jesse32@sautah.com

Pro Se Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

JESSE C. TRENTADUE,

Plaintiff,

vs.

FEDERAL BUREAU OF
INVESTIGATION, UNITED STATES
DEPARTMENT OF JUSTICE OFFICE
OF INFORMATION AND PRIVACY,
and UNITED STATES CENTRAL
INTELLIGENCE AGENCY,

Defendants.

**DECLARATION OF JOE
BRADFORD COOLEY**

Case No.: 2:08cv788 CW
Judge Clark Waddoups
Chief Magistrate Samuel Alba

Pursuant to 28 U.S.C. § 1746 I, Joe Bradford Cooley hereby submit this

Declaration based upon my personal knowledge of the matters set forth herein below:

1. In the 1990's, I had a security and private investigator's license with the *Council on Law Enforcement Education and Training*. From 1994 to 1996, I was employed as a Security Captain and private investigator for *Profile International Security Services* ("PFI").

2. PFI provided security and investigative work for businesses and individuals. My duties with PFI included, among other things, the hiring, training and supervision of PFI security officers. I also assisted PFI in preparing bids to customers for PFI's security services.

3. In early 1995, within three months PRIOR to the Alfred P. Murrah Federal Building bombing on April 19, 1995, PFI was in the process of preparing a bid for the security services contract at the Murrah Federal Building in downtown Oklahoma City, Oklahoma.

4. I directly participated in PFI's pre-bid investigation for the security services contract at the Murrah Federal Building. In doing so, I repeatedly met with Tom Hunt of the Federal Protective Services.

5. The Federal Protective Services, now part of the Department of Homeland Security, provides law enforcement and security services to federally owned and leased facilities. Mr. Hunt was head of the Oklahoma City Office of Federal Protective Services and the person in charge of security for the Murrah Federal Building.

6. My purpose for meeting with Mr. Hunt was to learn about the daily responsibilities of the security staff at the Murrah Federal Building in order to prepare PFI's bid. My contacts with Mr. Hunt involved a thorough walk through of the Murrah Federal Building's security system, including the video surveillance cameras used to monitor the Building.

7. Under Mr. Hunt's direction, I reviewed the Murrah Federal Building's security system, especially the video surveillance cameras. I spent many hours with Mr. Hunt at this task.

8. I met, for example, with Mr. Hunt at his office in the United States Federal Courthouse, which is located directly across the street and South of the Murrah Federal Building. In Mr. Hunt's office, I observed several computer screens and monitors that were receiving real-time images from cameras at the Murrah Federal Building.

9. On these monitors, I could see a complete view of the North side of the Murrah Federal Building and NW 5th Street, which the Building faced. Those views were from cameras placed at the Northwest and Northeast corners of the Murrah Federal Building.

10. I later toured the Murrah Federal Building and observed these cameras. Those two cameras provided a clear view of the North entrance to the Murrah Federal Building, including the street and sidewalk. I understood from my conversations with

Mr. Hunt that the video surveillance cameras and recording equipment was being provided by ADT Security Services, Inc ("ADT").

11. At that time, ADT's offices were located approximately five blocks from the former site of the Murrah Federal Building on Broadway Avenue just north and east of downtown Oklahoma City. To the best of my memory, Mr. Hunt said that the VCR tape decks used to record the surveillance camera images were located at ADT's offices. He also may have said that the recordings were done at his office. But either way, I understood from conversations with Mr. Hunt that the Murrah Federal Building surveillance cameras were being recorded on videotape.

12. In addition to inspecting the monitors at Mr. Hunt's office, Mr. Hunt also walked me through an underground tunnel from the United States Courthouse to the Murrah Federal Building. In doing so, we walked northbound into one level of a multi-level underground parking ramp. Just before we came to the entrance of the Murrah Federal Building via this parking ramp we stopped at a room located on the east side of the tunnel just north of the street entrance into the underground parking area.

13. There was a metal detector in the room. Upon entry, we were searched by individuals who Mr. Hunt said were Deputy U.S. Marshals. After being searched, we were allowed to enter the room. There were about five (5) Deputy Marshals in this room. There were also security camera monitors in this room showing the North entrance

to the Murrah Federal Building. These monitors also showed scenes from the surveillance cameras placed inside of the Murrah Building.

14. I asked one of the Marshals how he liked working for the Marshals Service. He told me that they were a "private Deputy U.S. Marshals service" based out of Denver, Colorado and were not associated with the "Federal Marshals Service." I also asked if they were authorized to carry firearms or make arrests off site and I was told "no." I thought this was odd but Mr. Hunt confirmed that this was the case. We continued our walk and entered the Murrah Building and proceeded on a complete tour of that Building, including the Social Security Office, the HUD offices and America's Kids Daycare Center.

15. On April 19, 1995, I was at the scene of the bombing within minutes of the blast. I arrived so quickly at the bombing scene because I was having breakfast at a restaurant about four blocks away from the Murrah Federal Building. When I arrived on the scene, I noticed that the street entrance to the underground parking lot (on the east side of the Murrah Federal Building) and just south of the Marshals' Station I had recently visited, was filled up with bricks and debris from the blasts. I never heard what happen to the people who were in the Marshals' Station that day. I presumed they had been killed.

//

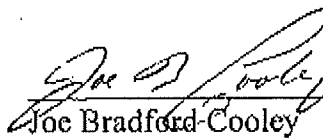
//

16. Ultimately, *PFI* was not awarded the security services contract for the Murrah Federal Building. Had it been given that contract, I and other *PFI* employees would have been at the Marshal's station when the bomb exploded. Consequently, that inspection of the Murrah Federal Building's security system will forever remain vivid in my mind as will the location of the security cameras, monitoring screens and other equipment that I had seen.

17. From my knowledge of the video surveillance security system in place at the Murrah Federal Building, and my presence on scene just after the bomb exploded, I have no doubt that the two external cameras on the Northwest and Northeast corners of that Building would certainly have recorded the entire event. Those cameras would even have recorded the delivery of the bomb to the Murrah Federal Building in a Ryder truck and, most importantly, those cameras would also have recorded everyone who exited that truck prior to the explosion. Because of their distance from the Murrah Federal Building, *ADT's* offices were not destroyed or otherwise damaged in the bombing, which means that the videotapes should still exist.

I declare under penalty of perjury that the information stated above is true and correct to the best of my knowledge.

EXECUTED on this 1st day of February, 2010 in Oklahoma City, Oklahoma.



Joe Bradford Cooley