

EXHIBIT 2

**For Federal criminal/civil case filing
-- PETITIONER'S ADDITIONAL EVIDENCE
BRIEF IN OPPOSITION TO "MOTION TO
DISMISS MOTION TO VACATE, SET ASIDE,
OR CORRECT SENTENCE" (Document #141)
AND IN SUPPORT TO PETITIONER'S 2255
MOTION (Document #125) --**

**Brian David Hill (Petitioner) v. United States of
America (Respondent)**

**Criminal Case Number 1:13-cr-435-1
Civil Case Number 1:17-CV-1036**

U.S.W.G.O.

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Against Hack Po

FBI Raid Radio Station Following Child Porn Hack

A raid in New Hampshire is the latest in connection with a mass hacking campaign by the FBI to identify visitors to a dark web child porn site.

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Joseph Cox

Mar 22 2016, 9:50am



Image: Nickolastock/Shutterstock

Over a year after the FBI took control of a dark web child pornography site and used a hacking tool **in an attempt to identify its users**, related arrests and cases are still cropping up. On Sunday, the FBI and local law enforcement raided a home that doubles up as a radio station in Keene, New Hampshire, linked to the same overarching investigation.

Liberty Radio Network (LRN) is **a small radio network** based in the home of Ian Freeman and TJ Park, both hosts of a program called Free Talk Live. The FBI seized over 40 computers and other electronic devices such as external hard-drives from the studio, according to a search warrant obtained by Motherboard. The search warrant states the name of the person controlling the internet connection for the house as Ian Bernard.

"We at the Liberty Radio Network would like to inform the public about the FBI search at our broadcast studio," a statement from LRN, signed by Park, reads. The statement adds that the seizure of equipment resulted in the network's audio feed temporarily going offline.



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control of Playpen and **ran it from a government facility** in Virginia for just under two weeks. During this time, the FBI **deployed a network investigative technique** (NIT)—a hacking tool—to identify users of the site **who visited specific**, child pornography-related threads.

According to **court documents**, around 1,300 IP addresses were obtained as part of the campaign, and Motherboard found that computers were hacked in Chile, Greece and **likely elsewhere**.

Back in January, the Department of Justice stated that around 137 people in the US had been charged in connection with the Playpen investigation. That number has likely increased, as more people have since **been arrested and charged**.

"Many people had access to the LRN wireless network over the previous year," the LRN statement continues. "If someone accessed a child pornography website from our network, the FBI will identify that person and arrest them. Those of us who had our devices seized will be fully exonerated of this crime. Some hosts at LRN are parents, so we fully understand the emotions and passions that arise when protecting children from sexual abuse. We ask that members of the public without judgment until the FBI finishes their investigation and all the facts are presented."

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Park, in **an interview with local news**, said that his laptop had also been taken. According to the local media report, no one was arrested as part of the raid, and Freeman said during a broadcast after the raid that he had not accessed the site.

Park claimed that some of the laptops used various forms of encryption.

"Some of us use TrueCrypt, LUKS, and PGP to protect our sources," Park told Motherboard in an email. He claimed that, "If the FBI cannot break this encryption, then we could have a constitutional test case on the 5th Amendment and whether the government can compel members of the press to decrypt their laptops." LUKS, or Linux Unified Key Setup, is commonly used **for full-disk encryption**.



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