

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, et al.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, et al.,  
Defendants.**

**Civil Action No.: 1:17-cv-2989-AT**

**DECLARATION OF KEVIN SKOGLUND**

Pursuant to 28 U.S.C. § 1746, I, KEVIN SKOGLUND, declare under penalty of perjury that the following is true and correct:

1. This declaration supplements my declarations previously submitted in this case, and I incorporate my previous declarations as if fully stated herein.

2. The Court has acknowledged my role as a voting system security expert engaged by Coalition Plaintiffs to provide expert analysis and testimony on the security and technical aspects of Georgia's voting system.

3. In January 2021, several individuals were given irregular access to the Coffee County Election Office and to Georgia's voting system in Coffee County.

4. Coalition Plaintiffs asked me to examine the documentary evidence of the irregular access to the Coffee County Election Office and its election equipment to determine what activities took place, to determine what election software or data

may have been copied and distributed, and to assess the implications of my findings.

5. Coalition Plaintiffs provided me with extensive data, documents, and security camera video recordings produced under subpoena for my analysis, which I reviewed thoroughly. Coffee County Election Office security video was produced by Coffee County counsel to Plaintiffs' counsel. The video recordings cover the time period from November 15, 2020 to February 26, 2021 and include three camera views: the primary outside entrance, the foyer and main room inside the Election Office, and a storage room. Throughout my declaration I have referenced video footage based on the date and time stamps in the video recordings. I believe the date and time stamps to be accurate. The video recordings are voluminous and cannot be easily transmitted online. The recordings will be made available to the Court upon request. They are available to the public upon request from Coffee County as public records.

6. I attended all of the depositions related to Coffee County via video conference and reviewed the transcripts. My analysis relies on the totality of this information and cites select items when appropriate.

7. Coalition Plaintiffs' counsel represented to me that some documents responsive to subpoenas have yet to be produced by the witnesses. When those documents become available, my declaration may require supplementation.

8. I had prior information about many of the individuals involved, their affiliations, and their election-related activities outside of Georgia, primarily through press reports and court filings. I used this knowledge during my analysis, but I primarily cite facts in the evidence for this case.

## **I. Summary of Conclusions**

9. After a review of the documentary evidence, my primary findings and conclusions are:

a. In 2021, the security of Georgia’s voting system was breached in Coffee County on at least three occasions: January 7, January 18-19, January 25-29.

b. On January 7, four SullivanStrickler employees travelled to the Coffee County Election Office. Over a seven-hour period, they copied data from much of the election hardware using forensic tools and techniques. They left Coffee County with election software and data on a hard drive. At least seven individuals—including one Election Board member and the Election Director—were concurrently in the Election Office.

SullivanStrickler performed the data collection under a contract signed by Sidney Powell on behalf of Defending the Republic, and were paid by Defending the Republic PAC. Their work was directed or coordinated by at least ten individuals.

c. The data collected by SullivanStrickler included complete copies of software and data from a variety of election devices. Four significant election components were included: the Election Management System server, the ImageCast Central scanner/tabulator, the ImageCast X ballot marking devices, and the media used to program ImageCast Precinct scanners.

d. Coffee County election software and data was distributed to at least ten individuals between January and June 2021. These individuals are affiliated with at least seven different organizations. Evidence suggests it was distributed further by some of those individuals.

e. During January 18-19, 2021, Doug Logan and Jeffrey Lenberg were given extraordinary access to Georgia's voting system in Coffee County by the Election Director. They had access for over 13 hours, including hours when the Election Office was closed to the public. During their visit, the system dates on several election computers were changed, scanner settings were reconfigured several times, over 6,500 ballots were scanned, and one precinct scanner was opened up to inspect the parts inside. Their work was organized by James Penrose and Charles Bundren.

f. During January 25-29, Jeffrey Lenberg was again given extraordinary access to Georgia's voting system in Coffee County by the

Election Director. He had access for almost seven hours over five days, and indicated an intention to have significantly more. During his visit, the system date on the central vote tabulator was changed twice (and never changed back), media was created to program a precinct scanner and a ballot marking device, 559 ballots were scanned, and he was given voting system data to take with him.

g. I am aware of no authorization given for the irregular access to Coffee County's Election Office in January 2021. The evidence indicates an illusion of authorization was created (1) by Eric Chaney leveraging his membership on the Board of Elections, (2) by Misty Hampton's willingness to collaborate, (3) by several attorneys lending their integrity as officers of the court, and (4) by involving many other willing and credulous participants.

h. These events were by any measure a consequential breach of Georgia's election security. The access controls to protect election hardware and software were obviously insufficient. The data collected includes protected software from almost every component of Georgia's election system. Control over the software and data cannot be reestablished after its distribution, and all of Georgia's counties and other states must endure the increased risks as a result.

i. The distribution of the data from Coffee County has made it easier for adversaries to obtain Georgia’s election software, which expands opportunities for existing and new adversaries. Those adversaries may use the software in disinformation campaigns or study it to learn how to subvert its operation through malware, reprogramming, or disabling defenses. This breach and others like it portend easier access to equipment to put manipulations into effect—in Coffee County strangers were given free rein for hours. These implications require that the recommendations of election security experts should be implemented fully and urgently.

10. Below, I will address each of these conclusions in greater detail.

## **II. Activity Related to Access on January 7, 2021**

11. On the Signal messaging application, a message group titled “SullivanStrickler” was used by several employees of SullivanStrickler, a company in the Atlanta area which offers forensic data services.<sup>1</sup> The message group participants included Paul Maggio, Greg Freemyer, Jennifer Jackson, and Karuna Naik. On January 1, 2021 at 2:18pm, Jennifer Jackson forwarded a text message to her colleagues from “Katherine”: “Hi! Just handed [sic] back in DC with the Mayor. Huge things starting to come together! Most immediately, we were granted access -by written invitation! - to the Coffee County Systems [sic]. Yay! Putting

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<sup>1</sup> SullivanStrickler corporate website, <https://www.sullivanstrickler.com>

details together now with Phil, Preston, Jovan etc. Want to give you a heads up for your team. [...]”<sup>2</sup>

12. In subsequent Signal messages during January 1-5, SullivanStrickler colleagues relayed updates about scheduling work in Coffee County based on various communications with Preston Haliburton and “Todd”.<sup>3</sup>

13. Because of SullivanStrickler’s communications with Haliburton, I found it relevant that on the prior day, on December 31, 2020 at 7:46pm, Eric Chaney, a Coffee County Election Board member, texted Misty Hampton, the Coffee County Election Director: “Did you get the letter sent”. Hampton replied, “No. I am going to finish it tomorrow”. Chaney responded with Preston Haliburton’s email address. At 9:13pm, Hampton texted back, “I resent it” and Chaney answered, “Thanks!!”<sup>4</sup>

14. If a “letter” from Hampton to Haliburton was the “written invitation” touted in Katherine’s message the following day, it was not in the evidence I reviewed.

15. On January 6, 2021 at 4:26pm, Hampton texted Chaney: “Scott Hall is on the phone with Cathy about wanting to come scan our ballots from the general election like we talked about the other day. I am going to call you in a few”.<sup>5</sup>

Security camera video shows Hampton and Cathy Latham, the chair of the Coffee

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<sup>2</sup> Exhibit 1, SSA Signal Messages, p. 1

<sup>3</sup> Ibid, p. 4-12

<sup>4</sup> Exhibit 2, Hampton-Chaney Messages - Dec 2020, p. 1

<sup>5</sup> Ibid, p. 2

County Republican Party, were together in the Election Office at that time, and shows Latham using a cell phone several times.

16. On or around January 6, 2021, a group message was created on Signal, titled “Coffee\_County\_Forensics”. The participants were James Penrose, Paul Maggio (SullivanStrickler), Greg Freemyer (SullivanStrickler), Jim Nelson (SullivanStrickler), Scott Hall, and attorney Charles Bundren. At 7:35pm, Penrose introduced Hall to the SullivanStrickler team. Bundren responded, “We need cell numbers to identify who they are for the people at the elections HQ.” After phone numbers are exchanged, Maggio requests, “Please provide address and POC [point of contact] name and phone”. Just after midnight, on January 7 at 12:21am, Hall responds, “Important to text POC Before coming in. [...] / POC is Mitzi Martin<sup>6</sup> Supervisor of Elections [...] / Second POC is Cathy Latham [...]” At 5:04am, Maggio responds, “We are planning on driving down. Leaving Atlanta around 8 AM”.<sup>7</sup>

17. On January 7, 2021 at 10:31am, Paul Maggio (SullivanStrickler) emailed Sidney Powell, an attorney, and copied James Penrose, Doug Logan, Tricia (Powell’s associate), and Brendan Sullivan (SullivanStrickler). The subject was “RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement

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<sup>6</sup> Misty Hampton’s surname was Martin at the time.

<sup>7</sup> Exhibit 2, SSA Signal Messages, p. 17-20



Agreement”. Maggio wrote: “Per Jim Penrose’s request, we are on our way to Coffee County Georgia to collect what we can from the Election / Voting machines and systems. As per our existing agreement, I am attaching the invoice for our initial retainer.”<sup>8</sup>

18. The invoice attached to the email was dated January 7, 2021 and billed to Sidney Powell / Defending the Republic, for project SSA1722 in the matter of “Voting Machines Analysis”. The two line items are “Forensics: Forensic Expert Daily Rate; 01/07/2021 On Site Coffee County Georgia; 4 people x 1 day” and “Forensics:Travel; Mileage | 394 miles round trip Atlanta GA to Douglas GA”. The total balance due is \$26,220.64.<sup>9</sup>

19. Earlier emails indicate that Maggio’s reference to “our existing agreement” pertains to the Engagement Letter, drafted by Maggio and signed by Powell on behalf of Defending the Republic on December 6, 2020.<sup>10</sup> Exhibit 1 to the Engagement Letter states “Customer is requesting that SS provide services such as Computer Forensic Collections and Analytics on the Dominion Voting Systems equipment; from the Poll Pads (iPads) to the Windows machines that run the scanners, to Linux machines that tabulate the votes [...]”<sup>11</sup>

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<sup>8</sup> Exhibit 4, Maggio email to Powell en route

<sup>9</sup> Exhibit 5, SSA Invoice

<sup>10</sup> Exhibit 6, SSA - Powell Engagement Letter

<sup>11</sup> Ibid, p. 3

20. On January 7, 2021 between 11:09am and 11:42am, text messages between Cathy Latham and Scott Hall coordinated SullivanStrickler's arrival.<sup>12</sup> Latham also texted Maggio: "How far out are you?" Maggio responded with "We are in town waiting for Scott to let us know when to pull in."<sup>13</sup>

21. Security camera video shows Latham waited outside the Coffee County Election Office at that time. When Paul Maggio, Jennifer Jackson, and Jim Nelson from SullivanStrickler arrived at 11:43am, Latham greeted them, escorted them inside, and introduced them to Misty Hampton (Election Director), Eric Chaney (Election Board member), and Ed Voyles (a former Election Board member with no official relationship to the Election Office at the time).

22. Security camera video shows Latham exited the Election Office and waited outside again. At 11:50am, Scott Hall and Alex Cruce arrived. Scott Hall is a bail bondsman from Atlanta, and Alex Cruce is a data analyst. They flew to Coffee County together on a private jet arranged by Hall.<sup>14</sup> Latham escorted them inside and introduced them.

23. Over the next hour, the SullivanStrickler team met with the assembled group in Hampton's office, retrieved equipment from their car, and were joined by their late-arriving colleague, Karuna Naik.

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<sup>12</sup> Exhibit 7, Latham-Maggio Messages, p. 2

<sup>13</sup> Exhibit 7, Latham-Maggio Messages, p. 1

<sup>14</sup> Alex Cruce Deposition Tr:152:13

24. Security camera video, photographs taken by SullivanStrickler, and metadata in files produced by SullivanStrickler agree that, over the next seven hours, the SullivanStrickler team made copies of the electronic data on much of Coffee County’s election equipment using forensic tools and techniques.

25. A photograph produced by SullivanStrickler shows a Dell Precision 3431 computer inside the server room in the Coffee County Election Office.<sup>15</sup> The computer monitor has a black screen with white text, not the typical Windows operating system. One of the computer’s USB ports is connected to a WD MyPassport external hard drive via a cable. The USB port above it is occupied by a USB drive with a manila hang tag labeled “DFIR UEFI”.

26. DFIR is an abbreviation for “digital forensics and incident response.” Digital forensics is a cybersecurity field that examines computer data, frequently through the creation of forensic images.

27. UEFI is an abbreviation for “Unified Extensible Firmware Interface.” UEFI can be thought of as a tiny operating system that runs on a computer instead of a standard operating system, like Microsoft Windows. UEFI is a common digital forensics tool for creating forensic images without activating the operating system on the target device.

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<sup>15</sup> Exhibit 8, SSA Photographs - Dell computer, p. 1

28. Another photograph produced by SullivanStrickler shows team members Jim Nelson and Karuna Naik working at the same Dell Precision 3431 computer while it is booted from the UEFI USB drive for the purpose of making a forensic image on the external hard drive.<sup>16</sup>

29. A third photograph produced by SullivanStrickler shows a Dell Latitude 3400.<sup>17</sup> Its screen reports that the creation of a forensic image is 67% complete. Plugged into the left side of the laptop is the USB drive tagged “DFIR UEFI” and a USB cable, presumably connected to an external hard drive out of frame.

30. It is a best practice in digital forensics to use a write-blocker when connecting any external device to the device being examined or copied. A write-blocker allows reading data *from* a device but prevents sending data *to* a device. Because data can only travel out, it precludes any data modification. It is possible to work without a write-blocker and not modify any data, but a write-blocker protects the device from mistakes by the technician and from any malware resident on the external device.

31. SullivanStrickler agreed that using a write-blocker is a best practice.<sup>18</sup> However, a write-blocker was not used in Coffee County. A hardware write-blocker—a device slightly larger than a bar of soap—is not visible in the

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<sup>16</sup> Exhibit 8, SSA Photographs - Nelson and Naik, p. 2

<sup>17</sup> Exhibit 8, SSA Photographs - Dell Laptop, p. 3

<sup>18</sup> Dean Felicetti Deposition Tr: 224:4-225:15

photographs. More importantly, I reviewed evidence in the data collected by SullivanStrickler that their activity *did change* data on one of the devices.

32. The Windows operating system records the connection of any USB device by default. In the data collected by SullivanStrickler, the relevant records<sup>19</sup> show that at 12:30pm, two USB devices were connected to the Election Management System server (“EMS”). The first was a WD MyPassport external hard drive, model WDBPKJ, serial number 575855324139303037584655. The second was a Samsung USB Drive, serial number 0376220080003100. These USB devices are consistent with the USB devices in the photographs.

33. In my opinion, this data change on the target device was likely due to a mistake by a technician. The EMS was the first device copied and the mistake was not repeated on other devices. I cannot determine if this mistake resulted in additional changes to the EMS because the only available evidence is from data captured *after* these USB connections were made. I can only conclude that a write-blocker was not used and at least some data on the EMS was changed as a consequence.

34. At 2:56pm, Maggio updated Penrose and Bundren via the “Coffee\_County\_Forensics” Signal group. “Collection is going well. No real issues

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<sup>19</sup> Windows Registry Key: HKLM\SYSTEM\ControlSet001\Enum\USB\

at this point. Looking to be here until 6-7 PM this evening”. Bundren replied with, “Thanks”.<sup>20</sup>

35. Security camera video of the primary room in the Election Office shows SullivanStrickler personnel engaged in activities consistent with copying data from KNOWiNK Poll Pads and USB drives. Security camera video did not include a view inside office of the Election Director or the server room beyond it where other election equipment resides.

36. Security camera video shows the SullivanStrickler team and everyone else departed the Election Office together at 7:43pm. At 7:47pm, Maggio updated the Signal group again, “We just finished up at Coffee County and are on our way back to Atlanta. Everything went well with no issues.” Bundren responded, “Thanks”, and Hall responded with emojis for thank you and the American flag.<sup>21</sup>

37. On January 8 at 3:48pm, Maggio replied to his prior email to Sidney Powell and added Scott Hall’s email address to the copied recipients list. Maggio wrote: “Everything went smoothly yesterday with the Coffee County collection. Everyone involved was extremely helpful.” He raised the issue of payment, then continued, “We are consolidating all of the data collected and will be uploading it to our secure site for access by your team.”<sup>22</sup>

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<sup>20</sup> Exhibit 1, SSA Signal Messages, p. 21

<sup>21</sup> Exhibit 2, SSA Signal Messages, p. 22

<sup>22</sup> Exhibit 8, Maggio-Powell Email - Jan 7

38. On January 9 at 5:24pm, Maggio sent Freemyer a message on Signal, “We are not uploading/giving access to anyone until we are paid. / I am communicating with Jim P one on one on Signal about getting paid before we release any data”. A few hours later, Maggio updated Freemyer, “Greg, let’s keep communications quiet for now. I am now negotiating directly with Sidney”.<sup>23</sup>

39. For this portion of my analysis I concluded:

a. On January 7, four SullivanStrickler employees—Paul Maggio, Jennifer Jackson, Jim Nelson, and Karuna Naik—travelled to the Coffee County Election Office. Over a seven-hour period, they copied data from much of the election hardware using forensic tools and techniques. They left Coffee County with election software and data on a hard drive.

b. While SullivanStrickler worked, at least seven individuals were concurrently in the Election Office: Eric Chaney (Election Board member), Misty Hampton (Election Director), Jil Ridlehoover (Assistant to the Election Director), Cathy Latham, Ed Voyles, Scott Hall, Alex Cruce.

c. SullivanStrickler performed the data collection under a contract signed by Sidney Powell on behalf of Defending the Republic, and were paid by Defending the Republic PAC. Their work was directed or coordinated by Sidney Powell, “Katherine”, Preston Haliburton, “Todd”,

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<sup>23</sup> Exhibit 1, SSA Signal Messages, p. 24

James Penrose, Charles Bundren, Scott Hall, Cathy Latham, Eric Chaney, Misty Hampton, and other individuals.

### **III. Coffee County Data Collected by SullivanStrickler**

40. I examined a physical hard drive produced by SullivanStrickler which SullivanStrickler represented contained all data collected in Coffee County on January 7, 2021 (“SSA Hard Drive”). The SSA Hard Drive has several directories which contain forensic images.

41. A forensic image is a copy of a physical data storage device which copies every data bit exactly as it exists on the device, including all directories, all files, and currently unallocated storage (which may include previously deleted data). A forensic image has significantly more fidelity to the original device than a copy made by dragging directories and files to a new device. It is an exact copy.

42. The SSA Hard Drive has forensic images of a Dominion Democracy Suite Election Management System server (“EMS”) from Coffee County as it existed on January 7, 2021. Coffee County’s EMS has two hard drives inside<sup>24</sup> and both were copied.

43. The EMS is a central computer with two important functions. Before an election, the EMS configures data for each election—precincts, ballot styles,

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<sup>24</sup> Dell Support Website, Service tag BRKP513, <https://www.dell.com/support/home/en-us/product-support/servicetag/0-UnNYXXRjckNITU1WanA0UXJNdUImdz090/overview>



contests, candidates, layout—which is then used to program scanner/tabulators and ballot marking devices. After an election, the EMS manages the import of data from all of the tabulators, aggregates the subtotals for each contest, and creates reports of the election results. The EMS is the most important component in the election system because it is responsible for both establishing the election “rules” and determining the election results.

44. The SSA Hard Drive has a forensic image of a Dominion ImageCast Central scanner/tabulator (“ICC”) from Coffee County as it existed on January 7, 2021.<sup>25</sup>

45. An ICC is commonly used to scan and tabulate ballots returned to the election office by mail.

46. The SSA Hard Drive has forensic images of 18 CompactFlash cards used with Dominion ImageCast Precinct scanner/tabulators from Coffee County as they existed on January 7, 2021.

47. CompactFlash cards are used by the Dominion ImageCast Precinct scanner/tabulators (“ICP”). The EMS exports data about an election, specific to each ICP, onto a CompactFlash card. The card is inserted into a port on an ICP, where it remains during voting. The card provides the ICP with data about the election, ballots, contests, candidates, and other configurations. When the polls

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<sup>25</sup> The SSA Hard Drive directory containing the forensic image of the ICC is mislabeled as “ICP”.

close, the card will contain post-election data such as the tabulation results, cast vote records, ballot images, and log files. After the card is returned to the election office, the EMS can extract the tabulation results and other data from it.

48. Photographs produced by SullivanStrickler show 18 CompactFlash cards with labels corresponding to ICPs in each of Coffee County's six precincts and early voting sites.<sup>26</sup> The text "March 24 2020 PPP" also appears, but is no longer correct because the cards have been reused since the label was printed.

49. I examined the contents of these 18 forensic images. At the time they were copied, the CompactFlash cards held data from the 2021 Run-off Election that had just concluded on January 5, 2021. The forensic images include ICP scanner configuration data, election results, image files of the ballots scanned during the 2021 Run-off Election, and residual ballot images from the 2020 General Election which were not overwritten by new data when the cards were reused.

50. The SSA Hard Drive has forensic images of seven USB drives from Coffee County as they existed on January 7, 2021.

51. USB drives are used by a Dominion ImageCast X ballot marking device ("ICX") in two ways. First, USB drives are used to install Dominion software on an ICX. Second, USB drives provide an ICX with data about the election, ballots,

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<sup>26</sup> Exhibit 08, SSA Photographs - CompactFlash cards, p. 4-5

contests, candidates, and other configurations. This data controls the content on the ICX touchscreen and controls the content of the QR code and text on ballots printed by the ICX.

52. Photographs produced by SullivanStrickler show seven USB drives with labels.<sup>27</sup> One forensic image, created from the USB drive labeled “ICX install”, contains two versions of the Android software used by the ICX, versions 5.5.10.30 and 5.5.10.32.<sup>28</sup> The six other forensic images contain data used to program an ICX for four previous elections.

53. The SSA Hard Drive also has a forensic image of a Mobile Ballot Printing laptop, partial data from 20 KNOWiNK Poll Pads, election-related reports for the 2020 General Election and 2021 Run-off Election, and scanned images of ballots from the 2021 Run-off Election.

54. For this portion of my analysis I concluded:

The data collected by SullivanStrickler included complete copies of software and data from a variety of election devices. Four significant election components are included: the Election Management System server, the ImageCast Central scanner/tabulator, the ImageCast X ballot marking devices, and the media used to program ImageCast Precinct scanners.

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<sup>27</sup> Exhibit 8, SSA Photographs - USB drives, p. 6-7

<sup>28</sup> On October 4, 2020, I submitted a declaration (Doc. 943) regarding the hasty upgrade from Dominion Democracy Suite ImageCast X 5.5.10.30 to 5.5.10.32. It is my understanding the newer version was installed on every ICX in Georgia later that month.

#### **IV. Distribution of Coffee County Data**

55. After its collection, Coffee County election software and data was distributed on at least three occasions: January 2021, April 2021, June 2021.

##### *Distribution via ShareFile in January 2021*

56. On January 8, 2021, Maggio emailed Powell, “We are consolidating all of the data collected and will be uploading it to our secure site for access by your team.”<sup>29</sup> The “secure site” is a ShareFile account maintained by SullivanStrickler. ShareFile is a popular, internet-based file storage and sharing platform operated as a service by a third party, Citrix Systems.<sup>30</sup> Administrators of an account can grant users permission to access certain directories. Users of the service can upload and download files in those directories through a public website.

57. Exhibit 10 (“ShareFile Permissions”) shows which users SullivanStrickler granted permission to view, upload, download, or delete files in specific directories on their account.<sup>31</sup> Exhibit 11 (“ShareFile Log”) is a list of activity showing each upload or download by a user who has been granted permissions.<sup>32</sup> Each entry in the log shows the date and time, file path, logged in user’s name, email, company, IP address, and other information. The entries are in reverse chronological order, with the oldest entries at the bottom. Portions of the

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<sup>29</sup> Exhibit 9

<sup>30</sup> Citrix Systems ShareFile product website, <https://www.sharefile.com>

<sup>31</sup> Exhibit 10, ShareFile Permissions (with redactions)

<sup>32</sup> Exhibit 11, ShareFile Log (with redactions)

ShareFile Permissions and ShareFile Log were redacted in the image and PDF versions, but the text versions are unredacted.<sup>33</sup>

58. ShareFile Log shows that Paul Maggio created a new directory on ShareFile on January 9, 2021 at 1:21pm, named “SSA1722/Coffee County Data”. ShareFile Permissions shows this new directory allowed eight SullivanStrickler employees, Doug Logan, Todd Sanders, Conan Hayes, and James Penrose to upload and download files.

59. Doug Logan is listed with an email address at “fightback.law”, a domain associated with #FightBack Foundation, Inc, which is operated by Lin Wood.<sup>34</sup> Logan does not have a company listed, but he was the owner of CyberNinjas.<sup>35</sup> Todd Sanders is listed as “Scott T”, however the email address listed at “bonfiresearch.org” belongs to Sanders.<sup>36</sup> His company is “ASOG”, an abbreviation for Allied Security Operations Group.<sup>37</sup> Conan Hayes has an email address at “bonfiresearch.org” and his company is also “ASOG”. James Penrose has an email address at “fightback.law” and his company is Defending the

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<sup>33</sup> Exhibit 12, ShareFile Permissions and Log (no redactions), (Linked at <https://www.dropbox.com/s/gqlxtxuezipwplx/08122022-000137.txt>)

<sup>34</sup> #FightBack Foundation website, <https://www.fightback.law>

<sup>35</sup> Doug Logan Deposition Tr: 5:8

<sup>36</sup> Doug Logan confirmed the email address belonged to Todd Sanders. Doug Logan Deposition, Tr 97:2-3

<sup>37</sup> Allied Security Operations Group corporate website, <https://asog.us>

Republic, the organization affiliated with Sidney Powell which paid SullivanStrickler for the Coffee County data acquisition.

60. Logan, Sanders, Hayes, and Penrose already had access to SullivanStrickler's ShareFile account prior to January 9. They had previously collaborated with SullivanStrickler on the acquisition of election software and data from Antrim County, Michigan.<sup>38</sup> ShareFile Permissions shows they had access to other directories related to that work, and ShareFile Log lists earlier file uploads and downloads by them related to that work.<sup>39</sup>

61. ShareFile Log shows that, after creating the "Coffee County Data" directory, Maggio uploaded all of the data acquired in Coffee County into it in several sessions during January 9-12. A few hours after he began uploading files, Logan, Sanders, and Hayes began downloading the same files.

62. Then, on January 10, Doug Logan created a new directory on ShareFile, "SSA1722/DJL Upload/Coffee – EMS." It is notable that this new directory *was not inside* the "Coffee County Data" directory created by Maggio. ShareFile Log shows that the "DJL Upload" directory had existed since December 31, 2020. ShareFile Permissions shows it had the same permissions as the "Coffee County

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<sup>38</sup> Exhibit 13, Plaintiff's First Amended Expert Witness List. *Bailey v. Antrim County*, Michigan Circuit Court for the County of Antrim, Case No. 20-9238-CZ. Apr. 9, 2021. Proposed expert witnesses include many individuals involved in Coffee County: James Penrose, Ben Cotton, Doug Logan, Greg Freemyer, Paul Maggio, Phil Waldron, Russ Ramsland, Jeffrey Lenberg, Todd Sanders, Conan Hayes.

<sup>39</sup> These entries are redacted in the image and PDF versions but are unredacted in the text versions.

Data” directory—eight SullivanStrickler staff, Logan, Sanders, Hayes, Penrose— with one notable addition. Michal Pospieszalski from Mehow Consulting, LLC, with an email address at “exemplarbusiness.com”, had permission to upload and download files.<sup>40</sup>

63. ShareFile Log shows that, early on January 11, Logan began uploading files to the “SSA1722/DJL Upload/Coffee – EMS” directory. Logan testified that “I converted the forensic image into a virtual machine, and I uploaded that result to the site. [...] [C]onverting it to a virtual machine allows you to potentially, you know, boot up the device and be able to utilize it like a computer, in order to look at how things operate, and more closely examine it like it was a local system you were using.”<sup>41</sup> In other words, Logan uploaded a new version of the forensic image that could be used more easily for analysis. Todd Sanders downloaded the virtual machine files the same morning.

64. On January 13, Doug Logan created a new directory on ShareFile, “SSA1722/DJL Upload/Coffee – ICC” and uploaded similar virtual machine files to it. Conan Hayes began downloading the files immediately.

65. The same day, James Penrose downloaded all files in the directory “SSA1722/Coffee County Data/Coffee County Ballot Images”.

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<sup>40</sup> These entries are redacted in the image and PDF versions but are unredacted in the text versions.

<sup>41</sup> Doug Logan Deposition Tr: 111:19-112:8

66. On January 15, Doug Logan created a new directory on ShareFile, “SSA1722/DJL Upload/Coffee – EMS – Fixed,” and uploaded files to it. When asked about this version, Logan testified, “the first time I did the conversion, something happened, and [...] it didn’t actually function and work right. [...] I redid a process and uploaded a version that actually functioned.”<sup>42</sup> Todd Sanders downloaded the updated virtual machine files during January 18-19.

67. On January 19, Michal Pospieszalski downloaded all files in the directory “SSA1722/DJL Upload”.<sup>43</sup> The download would have included among its contents the three directories added by Logan—“Coffee – EMS”, “Coffee – ICC”, “Coffee – EMS – Fixed”—which contained virtual machines of the EMS and ICC.

68. The ShareFile Log ends on February 26 which was on or around the date the document was generated from ShareFile. SullivanStrickler testified that the files remained on ShareFile until “Summer of 2021”<sup>44</sup> but that additional activity, which is now over a year ago, is not visible in their ShareFile account.<sup>45</sup>

69. [REDACTED] Jovan Pulitzer [REDACTED]

[REDACTED]

[REDACTED]

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<sup>42</sup> Doug Logan Deposition Tr: 112:15-20

<sup>43</sup> This entry is redacted in the PDF version but is unredacted in the text version.

<sup>44</sup> Dean Felicetti Deposition Tr: 296:6-18

<sup>45</sup> Ibid, Tr: 303:12-304:4



[REDACTED]

[REDACTED]

70. [REDACTED]

Todd Sanders, [REDACTED]

[REDACTED]

[REDACTED]

Logan testified that he later determined that “Cjames” was Conan James Hayes.<sup>48</sup>

71. [REDACTED] Phil Waldron [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

72. [REDACTED]

Russ Ramsland from ASOG, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] 14, [REDACTED]

<sup>47</sup> Exhibit 14, [REDACTED]

<sup>48</sup> Doug Logan Deposition Tr:139:17-23

<sup>49</sup> Exhibit 14, [REDACTED]

<sup>50</sup> Ibid, p. 12

“ [REDACTED]

[REDACTED] <sup>51</sup>

73. The available evidence did not indicate whether any Coffee County election software or data was given to Waldron, Bundren, or Ramsland.

74. At least until recently, Logan possessed the Coffee County election software and data collected by SullivanStrickler. He produced copies on a hard drive under subpoena for this case.

75. Thus, evidence shows that six individuals, affiliated with at least five organizations, downloaded Coffee County election software and data from SullivanStrickler’s ShareFile account during January 10 through February 25, 2021: Doug Logan, Todd Sanders, Conan Hayes, James Penrose, Michal Pospieszalski, and Jovan Pulitzer. Evidence suggests it may have been distributed further by some of those individuals.

*Distribution via FedEx in April 2021*

76. [REDACTED] Jeffrey Lenberg [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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<sup>51</sup> Ibid, p. 8

[REDACTED] Lenberg testified that he does not recall downloading data from SullivanStrickler's ShareFile.<sup>53</sup>

77. Two days later, on April 22, 2021, James Penrose emailed Paul Maggio and copied Stefanie Lambert, an attorney, and Greg Freemyer. The subject was: "Coffee County Forensics FEDEX Request". Penrose wrote, "Can you please FEDEX all the forensics material from the Coffee County acquisition to the same address as before. Please include the VMs on your download site as well." He continued, "Invoice Stefanie Lambert for the work like last time." Maggio replied to Penrose's email with, "This is received and we will begin the process of copying everything to a drive."<sup>54</sup>

78. In the evening on the following Tuesday, Maggio emailed a co-worker, attached a FedEx label, and asked her to "please get this out tonight."<sup>55</sup> The FedEx label is for an overnight delivery on April 27, 2021 from the office of SullivanStrickler in Forest Park, Georgia to Stefanie Lambert at an address in Royal Oak, Michigan.<sup>56</sup>

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<sup>52</sup> Exhibit 14, p. 9

<sup>53</sup> Jeffrey Lenberg deposition, 177:14-19

<sup>54</sup> Exhibit 15, Penrose-Maggio email re: Hard Drive to Lambert

<sup>55</sup> Exhibit 16, Maggio email to send FedEx

<sup>56</sup> Exhibit 17, FedEx label

79. The address in Royal Oak, Michigan is associated with Michael Lynch,<sup>57</sup> a private investigator.<sup>58</sup> Lenberg testified, “Michael Lynch worked with Stephanie Lambert. I believe he’s kind of a private investigator, that even before the elections was working with Stephanie Lambert. And once Stephanie got involved in the election stuff, I believe Lynch was kind of her right-hand man [...]”<sup>59</sup>

80. On April 28, 2021 at 7:55pm, Lambert forwarded Maggio’s emails about the FedEx shipment and the password needed to access the encrypted hard drive to Lenberg, and he responded “Got it.”<sup>60</sup>

81. Lenberg testified, “[A] disk drive from SullivanStrickler requested by Penrose and Stephanie Lambert was being sent to Michigan, and that disk went to Michael Lynch. Michael Lynch brought it over to the location I was at. I had a safe for safekeeping of any items. It was put in the safe. At some time, they asked me to make a copy of that, which they—I do not know what they did with it. It was provided to them to do something with it, but I was directed by Lambert and Lynch to make a copy. And then Michael Lynch retrieved the—that disk that was sent. And he took it for safekeeping somewhere else. [...] I was not involved in the

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<sup>57</sup> VoterRecords.com website, <https://voterrecords.com/voter/86706878/michael-lynch>

<sup>58</sup> Michigan Council of Professional Investigators Directory, p. 7  
<https://mcpihome.com/directory.php?p=7>

<sup>59</sup> Jeffrey Lenberg Deposition Tr: 103:9-16

<sup>60</sup> Exhibit 18, Lenberg-Lambert email, p. 9

[email] chain until the very end because they wanted me to make a copy, which they were going to do something else with. They sent me the password to be able to unlock it because it was encrypted.”<sup>61</sup>

82. The following Monday, May 3, 2021, Jeffrey Lenberg performed a demonstration with a Dominion EMS and ICP scanner/tabulator at Lynch’s Royal Oak address for a cable news channel video.<sup>62</sup> Lenberg testified that the EMS software he used in the video was from Antrim County, Michigan—not Coffee County, Georgia, that the ICP he used was provided by Lynch and Lambert from “Michigan somewhere”, and that Lambert told him it was “lawfully obtained”.<sup>63</sup>

83. Thus, evidence shows that three individuals, affiliated with at least two organizations, received Coffee County election software and data via Fedex in April 2021: Stefanie Lambert, Michael Lynch, Jeffrey Lenberg. In addition, Lambert and Lynch obtained a second copy for an unknown purpose.

*Distribution via ShareFile in June 2021*

84. Ben Cotton, from the company CyFIR, wrote in an affidavit in the District Court of Arizona, “In the course of my duties I have forensically examined

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<sup>61</sup> Jeffrey Lenberg Deposition Tr: 101:7-102:20

<sup>62</sup> One America News Network, video via YouTube, May 3, 2021.  
<https://www.youtube.com/watch?v=mX4KbcGt-U8>

<sup>63</sup> Jeffrey Lenberg Deposition Tr:153:3-155:1

Dominion Democracy Suite voting systems in [...] Coffee County Georgia, [...].”<sup>64</sup>

85. CyFir and Cotton were engaged to review Georgia’s election software and data by the Law Office of Stefanie L. Lambert, PLLC. The engagement letter, dated July 3, 2021 and signed by Cotton and Lambert, lists “Forensic analysis of evidence” and “Expert reports and testimony”, and describes the evidence as “evidence obtained by SullivanStrickler from Coffee County, Georgia”.<sup>65</sup>

86. By July 2021, Lambert had received the Coffee County election software and data from SullivanStrickler via FedEx, and Lenberg had made a second copy of it. Cotton was not given either of those copies.

87. Cotton testified at his deposition that James Penrose provided his credentials to enable Cotton to access SullivanStrickler’s ShareFile account, and—while logged in as Penrose—Cotton downloaded the Coffee County election software and data around June 11-12, 2021. Cotton testified that the data exists on a computer at his home in Montana on the day of his deposition.<sup>66</sup>

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<sup>64</sup> Declaration of Benjamin R. Cotton, *Lake v. Hobbs*, United States District Court for the District of Arizona, Case No. 2:22-cv-00677-JJT. June 8, 2022, <https://coalitionforgoodgovernance.sharefile.com/d-s26e084cef97f46d0b2147ec85d38f681>

<sup>65</sup> Exhibit 19, Cotton-Lambert Engagement Letter

<sup>66</sup> Benjamin Cotton Deposition Tr: 88:9-89:8 and 130:9-11

88. Thus, evidence shows at least one person, from another organization, received Coffee County election software and data from SullivanStrickler's ShareFile account during June 2021: Ben Cotton from CyFir.

89. For this portion of my analysis I concluded:

Coffee County election software and data was distributed to at least ten individuals between January and June 2021: Doug Logan, Todd Sanders, Conan Hayes, James Penrose, Michal Pospieszalski, Jovan Pulitzer, Stefanie Lambert, Michael Lynch, Jeffrey Lenberg, Ben Cotton. These individuals are affiliated with at least seven different organizations: #FightBack, CyberNinjas, Allied Security Operations Group, Defending the Republic, Mehow Consulting, Law Office of Stefanie L. Lambert, CyFir. Evidence suggests it was distributed further by some of those individuals.

**V. Activity Related to Access on January 18-19, 2021**

90. [REDACTED] James Penrose [REDACTED]

[REDACTED] Penrose, Misty Hampton (Coffee County Election Director), Doug Logan, and Jeffrey Lenberg. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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<sup>67</sup> Exhibit 14, [REDACTED]

91. Lenberg testified that the purpose of their trip to Coffee County was, “[W]e got notice, Penrose did, that another major anomaly had occurred during the runoff in Coffee County. And that in particular was that it appeared that the machine, the ImageCast Central [...] had been remotely reconfigured by Dominion apparently.”<sup>68</sup>

92. [REDACTED] Lenberg [REDACTED]

[REDACTED]

[REDACTED]<sup>69</sup>

93. [REDACTED]

[REDACTED] Lenberg, who resides in New Mexico, drove from Jacksonville, Florida. Logan drove from Sarasota, Florida.

94. Monday, January 18, 2021 was a holiday and the Election Office was closed. Security camera video shows Hampton, Logan, and Lenberg met at the Election Office at 4:20pm and Hampton’s daughter, DyAnna Hayes, joined them an hour later.

95. The security camera video provides few facts about their visit. The group spent most of their time in Hampton’s office, out of the view of the security camera. At 5:25pm, Hayes retrieved blank ballots from the storage room. At

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<sup>68</sup> Jeffrey Lenberg Deposition Tr: 44:7-13

<sup>69</sup> Exhibit 14, [REDACTED]

<sup>70</sup> Exhibit 14, [REDACTED]



6:12pm, Hampton retrieved an ICP scanner from the storage room. Everyone left the Election Office at 8:06pm.

96. The following day, January 19 at 8:52am, Hampton, Logan, and Lenberg arrived at the Election Office. They spent most of their time in Hampton's office. At 10:58am, DyAnna Hayes arrived. At 1:20pm, Hayes retrieved a second ICP scanner from the storage room. At 6:02pm, Hayes retrieved a roll of paper tape for printing ICP election results. The group left the Election Office at 6:19pm.

97. Evidence indicates Eric Chaney, an Election Board member, was aware of their visit. On January 19 at 10:35am, Hampton texted Chaney "If you happen to be in town, the guys measuring my desk are still here".<sup>71</sup> "Measuring my desk" appears to be a code phrase between Chaney and Hampton. She would use it again in a text to Chaney on January 27. Hampton testified that the phrase was indeed a reference to Logan and Lenberg, but pled the Fifth Amendment when asked why she used it and when asked if she thought there was something wrong with what they were doing.<sup>72</sup>

98. Lenberg testified about their activities: "[For ICP testing] Misty got on her BMD, an ICX that she had there, and she created a number of ballots [...] [Misty] got out, I believe, 40 blank ballots that were left over from the 2020

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<sup>71</sup> Exhibit 20, Hampton-Chaney Messages re: measuring the desk

<sup>72</sup> Misty Hampton Deposition Tr: 124:5-125:14

election, and we helped fill out those ballots by hand. And those were the ballots that were used to test the ICC. [...] [DyAnna Hayes] ran the ICP, while Doug observed that, and Misty Hampton ran the ICC, while I observed that. And we basically ran lots. When you do testing like this, you've got to get statistics right, so you run batch after batch after batch. And we were running the same ballots over and over and over and over".<sup>73</sup>

99. To better understand Logan and Lenberg's activities while in the Election Office, I reviewed forensic images made from the Coffee County EMS and ICC computers more than 18 months after their activity in January 2021.

100. I was given a hard drive containing the forensic images for the Coffee County EMS and ICC made by a contractor for the State Defendants, Jim Persinger of PM Investigations ("PMI Hard Drive"), and a hard drive containing forensic images for the EMS and ICC made by a contractor for the Plaintiffs, Relevant Data Technologies ("RDT Hard Drive").

101. Metadata for the forensic images on both hard drives shows that they were made from the same physical hard drives as the EMS and ICC forensic images found on the SSA Hard Drive. Metadata on the PMI Hard Drive shows a forensic image was created from the EMS on July 5, 2022 and from the ICC on September 15, 2022. Metadata on the RDT Hard Drive shows a forensic images

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<sup>73</sup> Jeffrey Lenberg Deposition Tr: 110:22-112:5

was created from the ICC on September 16, 2022 and from the EMS on September 22, 2022.

102. These forensic images are imperfect evidence. State Defendants represented that the EMS and ICC were removed from Coffee County on June 8, 2021 but have not produced any chain of custody evidence dated prior to July 2022. Chain of custody evidence begins on July 1, 2022 when Persinger took possession of Coffee County's EMS and ICC from Michael Barnes.<sup>74</sup> I cannot assess with certainty what changes may have been made before that date, and Persinger makes a similar statement in his declaration.<sup>75</sup>

103. Once in his custody and after he made the forensic image of the EMS, Persinger made modifications to the original computer, in part by resetting the primary user's password.<sup>76</sup> These actions modified evidence that would allow independent verification that his copy is an accurate copy of the original. Additionally, Persinger waited for over two months to make the forensic image of the ICC. I must rely on Persinger's representation that no other changes were made while the servers were in his custody.<sup>77</sup>

104. I created virtual machines from the forensic images on the PMI Hard Drive and RDT Hard Drive. I reviewed the system and application log files. I

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<sup>74</sup> Exhibit 21, Declaration of James Persinger (Nov. 10, 2022), Exhibit C - Chain of Custody

<sup>75</sup> Exhibit 22, Declaration of James Persinger (Nov. 10, 2022), ¶ 17.

<sup>76</sup> Exhibit 22, Persinger Declaration, ¶ 23.

<sup>77</sup> *Ibid*, ¶ 51.

compared data to the forensic images on the SSA Hard Drive to understand what activity occurred in the intervening months. I consulted with Dr. Alex Halderman who also reviewed the hard drives for the Curling Plaintiffs.

105. A review of these forensic images revealed an important detail. On January 19, 2021 at 10:42am and at 10:47am, the system date on the ICC and EMS were changed to November 5, 2020 (75 days earlier) and were never restored to the true date.<sup>78</sup>

106. Lenberg testified that he suggested changing the system dates because, if there was malicious code installed, “one of the things that a bad actor would do potentially is use the date as a trigger.”<sup>79</sup> When asked why he did not change it to November 3, the date of the 2020 General Election, Lenberg testified, “I don’t remember the exact reason why other than I was trying to do something close to the election, but not the election, to make sure I was in what might be a window in which a subversion was [...] triggered [...] so that they could defeat logic and accuracy testing and survive a machine recount.”<sup>80</sup>

107. The practical result of the system date change was that EMS and ICC began using the modified date when logging events and creating and modifying

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<sup>78</sup> Exhibit 23, Windows event logs, p. 1-2

<sup>79</sup> Jeffrey Lenberg Deposition Tr: 117:7-9

<sup>80</sup> Deposition of Jeffery Lenberg Tr: 120:7-9

files. For clarity of reading, I will reference the true dates, which requires adding 75 days to the dates in the evidence.<sup>81</sup>

108. The data for the ICC contains a file, “slog.txt”, which is used by the Dominion software to log information about user activities.<sup>82</sup> On January 18, the log file shows that the ICC scanned 772 ballots in 6 batches. On January 19, the log file shows that the ICC scanned 5,084 ballots in 33 batches. In the final 11 batches, beginning at 5:11pm, the log file recorded a noticeable increase in scanner errors and batches that halted on ambiguous marks on a ballot.

109. Lenberg testified that, at around this time, he looked through Coffee County’s copy of the ICC software manual and discovered that “built into the Dominion software is an interface to tweak the scanner settings [...] And so what I did is I asked Misty to start changing those parameters to see if they made any difference.”<sup>83</sup> Lenberg produced hand-written notes dated January 19 which document changes to each of these parameters, including brightness, contrast, gamma, moire reduction, color drop-out, skew, and double feed detection.

110. There is less evidence about their use of the two ICP scanners that were brought into Hampton’s office during their visit. The evidence does not

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<sup>81</sup> The log files require meticulous examination because, not only do some dates require adjustment, the computers logged events more than once for dates in the November 2020 to January 2021 time period.

<sup>82</sup> \DVS\Training Absentee By Mail ICC\Project\1\_08\_150\_0\_slog.txt

<sup>83</sup> Jeffrey Lenberg Deposition Tr: 124:9-126:10

include forensic images of that data. The ICPs were used in subsequent elections and their CompactFlash cards were likely re-used and overwritten.

111. Logan's testimony suggests the system date on the ICP was set to an earlier date, as was done on the EMS and ICC. "[Y]ou put the date to that time period of what it was on election day, and then you know that if any sorts of triggers it could have been in place are likely also to trigger again, and you would see the – the resulting behavior. [...] [W]hen you boot up the ICP device, I believe one of the things that displays when you check and validate, when you start an election is date and time."<sup>84</sup>

112. I reviewed a report authored by Logan which states that scans were performed on 677 test ballots in an effort to determine whether the ICP showed bias against ballots marked for Donald Trump.

113. Lenberg testified that they also took the extraordinary step of opening up one of the two ICPs to scrutinize the parts inside. "[Misty] had a ICP that was being sent back for repair. And she – because she wanted to know whether or not there was remote access, she took the cover off [...] and let us look inside to see whether or not there was a modem inside the equipment. [...] We found a slot that – where you could add in a card that was near the outside. It appeared that it could

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<sup>84</sup> Doug Logan Deposition Tr: 4:25-43:9

have been a modem add-in, there's no guarantee, but we did not see anything that appeared to [be] a modem to us inside.”<sup>85</sup>

114. On January 20, 2021, the day after Logan and Lenberg departed Coffee County, [REDACTED]

[REDACTED] Penrose, Logan, and Lenberg. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

115. [REDACTED] Lenberg [REDACTED]

[REDACTED]  
[REDACTED]

116. For this portion of my analysis I concluded:

During January 18-19, 2021, Doug Logan and Jeffrey Lenberg were given extraordinary access to Georgia's voting system in Coffee County by the Election Director, Misty Hampton. They had access for over 13 hours,

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<sup>85</sup> Jeffrey Lenberg Deposition Tr: 289:13-290:16

<sup>86</sup> Exhibit 14, [REDACTED]

<sup>87</sup> Ibid, p. [REDACTED]

including hours when the Election Office was closed to the public. During their visit, the system dates on the election computers were changed, scanner settings were reconfigured several times, over 6,500 ballots were scanned, and one precinct scanner was opened up to inspect the parts inside. Their work was organized by James Penrose and Charles Bundren.

**VI. Activity Related to Access on January 25-29, 2021**

117. [REDACTED]

[REDACTED] Jams Penrose, Doug Logan, and Jeffrey Lenberg, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

118. Security camera video shows that Lenberg arrived at the Coffee County Election Office on January 25 at 1:18pm. He spent most of the time in Misty Hampton's office with Hampton and her daughter, DyAnna Hayes, out of the view of the security camera. At 1:49pm, Hayes retrieved an ICP and blank ballots from the storage room. At 2:23pm, Hampton retrieves an ICX ballot marking device and

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<sup>88</sup> Exhibit 14, [REDACTED]



printer. At 4:00pm, Hampton retrieves blank ballots from the storage room. At 5:33pm, Lenberg leaves the Election Office.

119. A review of the forensic images on the PMI Hard Drive and RDT Hard Drive provided more evidence of their activities inside the office. I was cognizant that the system dates on the EMS and ICC had been modified (and they would be modified again). For clarity of reading, I will reference the true dates, which at the outset requires adding 75 days to the dates in the evidence.

120. The Dominion Election Event Designer software (EED) installed on the EMS records user activity in a log file. The log shows that, on January 25 between 2:20pm and 2:42pm, EED was used to program a CompactFlash for use with an ICP scanner and to program a USB drive and Smart Card for use with an ICX ballot marking device.<sup>89</sup>

121. The Windows event logs show that the system date and time on the ICC was changed twice more on January 25. At 4:25pm, it was set to November 3, 2020 at 8:25am (83 days and 8 hours before the true time). At 5:01pm, it was set to November 5, 2020 at 9:01am (81 days and 8 hours before the true time).<sup>90</sup> It was never changed back to the true time. The EMS date and time was not changed further; it remained 75 days behind the true time.

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<sup>89</sup> “\Program Files\Dominion Voting System\Log\Info.log”

<sup>90</sup> Exhibit 23, Windows event logs, p. 3-4

122. Lenberg produced hand-written notes dated January 25 which document scanning batches of ballots “hand filled by Jeff” and “Misty made (all QR)”. The ICC log file, “slog.txt”, shows that 559 ballots were scanned in 25 batches on January 25, 2021. The last ballot was scanned at 5:26pm, four minutes before Lenberg left the Election Office for the day. It was also the last ballot scanned during the week.

123. On the second day, January 26, 2021, security camera video shows Lenberg arrived at the Election Office at 10:30am and went into Hampton’s office. At 11:08am, an Inspector with the Georgia Secretary of State Investigations Division arrived at the Election Office to speak with Hampton. Lenberg exited Hampton’s office and went into another room while the Inspector and Hampton met in Hampton’s office. After the Inspector left, Lenberg returned to the main room and looked out the window—an action that appears to be making sure the Inspector had left. Soon after, at 11:15am and only seven minutes after the Inspector’s arrival, Lenberg departed the Election Office.

124. Evidence indicates Election Board member Eric Chaney was aware of Lenberg’s follow-up visit that week. The following morning, January 27 at 9:23am, Hampton texted Chaney, “I took care of the people measuring my desk”,

again using the same code phrase used on January 19 to reference Lenberg's activities.<sup>91</sup>

125. On the same day, soon after that text, security camera video shows Lenberg arrived at the Election Office at 9:59am, went into Hampton's office, and departed at 10:22am, after only 23 minutes had elapsed.

126. [REDACTED] Lenberg [REDACTED] Penrose and Logan [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

127. The same day, at 9:12pm, Lenberg submitted an Open Records Request ("ORR") to Coffee County. Lenberg wrote that he was "doing independent research to help verify the accuracy of the 2020 General Election." He requested copies of the ICP results tapes and the batch and tally sheets for the "full hand recount" of the 2020 General Election. His request stated that he would provide a thumb drive to accept the records.<sup>93</sup>

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<sup>91</sup> Exhibit 20, Hampton Chaney Messages re: measuring the desk

<sup>92</sup> Exhibit 14, [REDACTED]

<sup>93</sup> Exhibit 24, Lenberg Open Records Request, p. 3

128. On the fourth day, January 28, 2021, security camera video shows Lenberg arrived at the Election Office at 2:11pm, went into Hampton's office, and left again at 2:21pm, after only 10 minutes had elapsed.

129. Lenberg produced a compressed file in the Zip format, named "Coffee CF.zip", which he represented he received from Hampton via a thumb drive on or around January 28, 2021. The file was password protected to prevent decompression to reveal its contents. Lenberg testified that he did not know the password, and he was unable to locate it.<sup>94</sup>

130. I was able to determine the correct password for the file using other information in the evidence. When unlocked and decompressed, it yields a directory containing 18 subdirectories, named "CF01" through "CF18". The subdirectories contain data from the 2021 Run-off Election, copied from the 18 CompactFlash cards used in Coffee County's ICPs. They are not forensic images of the cards, like those created by SullivanStrickler. Instead, the data includes only the visible files from each card: scanner configuration files, election results, log files. The ballot images, which would not be readily visible to a user examining a CompactFlash card, are not included. The file metadata shows that the directories holding the data were created on January 27 between 2:50pm and 2:56pm.

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<sup>94</sup> Jeffrey Lenberg Deposition Tr. 184:17-185:1 and 330:4

131. These files do not fit the description of the records Lenberg requested in the ORR. Lenberg testified that he did not believe these files were intended to be a response to the ORR, that he requested them from Hampton independently.<sup>95</sup> However, on February 4, 2021, Hampton emailed the records administrator that Lenberg's ORR was complete and could be closed. Hampton wrote, "He gave me a thumb drive and I put it on the thumb drive," and "The information on the thumb drive was a copy of the top part of the ICP tape, the batch sheets from the hand recount and the tally sheet from the hand recount".<sup>96</sup> The evidence does not include any additional files that match the ORR.

132. On the fifth and final day of Lenberg's visit, security camera video shows that Lenberg arrived at the Election Office at 2:33pm. He spent most of the time in Hampton's office. At 3:27pm, Lenberg and Hampton retrieved a KNOWiNK Poll Pad. He departed at 3:57pm.

133. Lenberg testified about using the Poll Pad, "I believe they actually demonstrated to me the pollbook. But other than telling me how it worked, demonstrating it, they showed me that [...] it was connected to the internet during its operation and that they literally could go order Domino's Pizza and have it delivered while it was connected to the internet."<sup>97</sup>

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<sup>95</sup> Jeffrey Lenberg Deposition Tr: 188:2-15

<sup>96</sup> Exhibit 25, Hampton-Vickers email re: ORR

<sup>97</sup> Jeffrey Lenberg Deposition Tr. 71:21-72:7

134. For this portion of my analysis I concluded:

During January 25-29, Jeffrey Lenberg was again given extraordinary access to Georgia's voting system in Coffee County by the Election Director, Misty Hampton. He had access for almost seven hours over five days, and he had intended to have significantly more. During his visit, the system date on the central vote tabulator was changed twice (and never changed back), media was created to program a precinct scanner and a ballot marking device, 559 ballots were scanned, and he was given voting system data to take with him.

## **VII. Authorization**

135. A foundational issue before assessing the implications of these activities is determining what authorization had been given for them and by whom. Authorization is distinct from whether these activities were legal—I am not a lawyer and offer no opinion on legality. Unauthorized activity implicates failures in oversight, processes, or controls, which are significant for assessing security.

136. My experience is that only explicitly authorized individuals are permitted to access a voting system, and the authorizations are typically enumerated in state law or in the election software vendor in a license agreement with the jurisdiction. Authorization for other parties to access a voting system is

exceedingly rare and, when granted, is usually by order of a court and for a clear purpose.

137. The level of access to Georgia's voting system in this case was extraordinary. The voting system components were accessed, analyzed, tested, and manipulated by many individuals, often with little oversight. Most of the voting system software was duplicated and distributed widely to many individuals, with many affiliations, most of whom reside outside the state of Georgia. It is notable that the purpose of allowing such extraordinary access remains murky. Various reasons were given during depositions, but the reasons do not align. So, who authorized such breadth and depth of access?

138. I saw no evidence that any court authorized these activities or even any evidence of any active litigation related to them.

139. The Secretary of State's office has represented that they did not know about these activities, and therefore could not have authorized them. In addition, on November 17, 2020, Elections Divisions Director Chris Harvey sent an Official Election Bulletin to all Georgia counties explicitly advising that no third party should be given election software and data.<sup>98</sup>

140. Dominion Voting Systems is unlikely to have given authorization, because several months later, on May 6, 2021, they sent a Customer Notification to

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<sup>98</sup> Exhibit 26, Chris Harvey Official Election Bulletin

all Georgia counties which stated, “It is critically important that only authorized, legal users be granted access to voting equipment in order to maintain secure chain of custody for your system” and that the software license states “who can legally access the system with the company’s consent” but “does not allow for the release of voting systems to unaccredited, non-certified third parties without prior written consent.”<sup>99</sup>

141. SullivanStrickler initially received a text from “Katherine” who cited a “written invitation” from Coffee County. SullivanStrickler testified that they believed the work was authorized by Coffee County election officials who were on-site and “[t]hat the direction provided [to] us was was under a legal umbrella of a directing attorney.” They testified that Sidney Powell, an attorney, was their customer, and they did not conduct due diligence on her representations of authorization in the engagement letter.<sup>100</sup>

142. Doug Logan testified that James Penrose, who worked with Sidney Powell, told him it had been cleared by an attorney, but it was not Powell, “I even asked who the attorney was. And he told me it was Charles Bundren.”<sup>101</sup> Logan continued, “I believe I talked with an attorney. Attorneys usually aren’t into breaking the law, that’s just not their thing, you know. [...] Going to a place,

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<sup>99</sup> Exhibit 27, Dominion Voting Systems Customer Notification

<sup>100</sup> Dean Felicetti Deposition Tr: 71:3-73:9 and 75:3-16

<sup>101</sup> Doug Logan Deposition Tr: 21:12-14



there's elected people there. You know, they know that we're coming, we're welcomed. I mean, what reason would I ever have to suspect that it wasn't authorized."<sup>102</sup> However, Logan could not recall who Bundren's client was and stated, "It would be my assumption, but this is speculation, that it was the county itself."<sup>103</sup>

143. Jeffrey Lenberg did not share Logan's view, despite the fact that they were working together. Lenberg testified, "I still don't know who Charles Bundren is."<sup>104</sup> Instead, he testified, "[M]y understanding is that Ms. Hampton was the election supervisor for the county and that she had full authority [...]"<sup>105</sup> Regarding the CompactFlash card data Lenberg obtained the following week, he testified, "I got a copy directly from the election supervisor, who I believe was authorized to give it to me,"<sup>106</sup> and that he was not working for any attorney when he obtained them.<sup>107</sup> Regarding the copy Lenberg made of the Coffee County software and data while in Michigan, he cited the direction of Stefanie Lambert, an attorney in Michigan.<sup>108</sup>

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<sup>102</sup> Doug Logan Deposition Tr: 60:14-24

<sup>103</sup> Doug Logan Deposition Tr: 38:11-18

<sup>104</sup> Jeffrey Lenberg Deposition Tr: 77:14-15

<sup>105</sup> Jeffrey Lenberg Deposition Tr: 91:2-4

<sup>106</sup> Jeffrey Lenberg Deposition Tr: 202:17-19

<sup>107</sup> Jeffrey Lenberg Deposition Tr: 189:17-20

<sup>108</sup> Jeffrey Lenberg Deposition Tr: 101:17-18

144. When Misty Hampton was asked if “Eric Chaney told you in effect that these board members want you to allow someone to come in and copy the election software”,<sup>109</sup> and “was your understanding that the direction from Mr. Chaney extended from the access that was given on the 7th to additional access that was given on the 17th and the 18th”, she responded affirmatively to both questions.<sup>110</sup> Hampton testified, “I didn’t do anything without the direction of Eric Chaney.”<sup>111</sup>

145. The Coffee County Board of Elections testified that it did not know about or authorize these activities. In a deposition, a representative for the Board answered a series of questions:<sup>112</sup>

Q: Did the Board approve any of the individuals coming in on January 7, 2021, to be in the office and do any of the work they did there?

A: The Board did not approve that.

Q: Do you know whether Eric Chaney approved that on behalf of the Board or as a member of the Board?

A: I do not know if Eric Chaney approved of that. I will say any decision made requires a quorum of the Board.

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<sup>109</sup> Misty Hampton Deposition Tr: 65:14-67:1

<sup>110</sup> Misty Hampton Deposition Tr: 114:11-21

<sup>111</sup> Misty Hampton Deposition Tr: 120:7-8

<sup>112</sup> Coffee County Board of Elections Deposition Tr: 48:20-49:14

Q: So Mr. Chaney would not have the authority on his own to approve that work?

A: No.

Q: And as you sit here, the Board does not have any insight or understanding as to why Mr. Chaney was here for that work that occurred?

A: The Board does not.

146. Eric Chaney, now a former member of the Coffee County Board of Elections, pled the Fifth Amendment when asked about his involvement.

147. For this portion of my analysis I concluded:

Legitimate authorization was *not given* for the irregular access to Coffee County's Election Office in January 2021. The evidence indicates an illusion of authorization was created (1) by Eric Chaney leveraging his membership on the Board of Elections, (2) by Misty Hampton's willingness to collaborate, (3) by several attorneys—including Powell, Bundren, and Lambert—lending their integrity as officers of the court, and (4) by involving many other willing and credulous participants.

## **VIII. Implications**

148. The focus of this portion of the analysis was to assess the implications of the information and events presented in the evidence, especially how they may impact the future security of elections in Coffee County and throughout Georgia.

149. In this portion, I depart from the documents and rely on the totality of my knowledge and experience regarding voting technology and cybersecurity.

150. Any analysis of the implications must begin by acknowledging that elections are national critical infrastructure. Election systems must meet a higher standard for security, reliability, and resilience than standard industrial and commercial systems. I also expect election systems to draw more attention from adversaries around the world than most systems do. Unlike other critical infrastructure, elections are the very foundation of our democracy. The health of our democracy depends on reliable elections with trustworthy outcomes. Any implications are magnified when viewed through that lens.

151. The scope of the access and data collection in Coffee County is broad and impressive. SullivanStrickler copied software and data from almost every component of Georgia's election system. It contains protected software and data that is unavailable by any other means to the public or even to election experts. The significance of its collection onto a single hard drive in the possession of someone outside an election office, followed by its unregulated distribution to

many others, cannot be overstated. These events were by any measure a consequential breach of Georgia’s election security.

152. Below, I explain several implications in greater detail.

### *Insider Threats*

153. If unauthorized individuals took unauthorized actions with election hardware and software, the most obvious implication is that the existing oversight, procedures, and access controls failed to prevent it. Unauthorized actions can be facilitated by someone with *authorized* access and credentials (an “insider”), such as an election board member, the election director, or others working in the election office.

154. Insider threats are a common security challenge but access can be more effectively regulated by various means. For example, a secure door can have multiple locks with keys held by different people. Another common defense to protect software and data from copying or alteration is to encrypt the hard drives and other storage media, which information security professionals generally refer to as “data at rest”. The encrypted data at rest can be copied, but it cannot be accessed without first decrypting it. Microsoft Windows—the operating system on the Coffee County EMS and ICC computers—has BitLocker software built-in which could encrypt the hard drives. BitLocker encrypted data can only be accessed by using a password hidden in the computer’s hardware or by using a

secret “recovery” password. BitLocker is not used by Georgia’s voting system. If it had been used, it would have made it difficult to make forensic images of those devices, even with insider assistance.

155. Insiders facilitated the activities in Coffee County in January 2021 and the oversight and access controls to protect election hardware and software were insufficient.

*Implications for Coffee County’s Election Hardware*

156. Any time election hardware is accessed without authorization or its chain of custody is broken, it introduces a significant risk the hardware has been manipulated or damaged—intentionally or inadvertently—and the flaws will not be detected or remediated. Afterwards, the hardware should be considered unreliable and untrustworthy.

157. One cannot know whether manipulation or damage occurred in the course of the data acquisition in Coffee County. The systems could be tested exhaustively, pass all tests, and yet still fail to find a problem. It is difficult to prove a negative. The documents show there was ample access and opportunity for manipulation or damage.

158. There are several examples during Doug Logan and Jeffrey Lenberg’s visit. Lenberg directed much of the work, yet he testified that it was his first

experience with a voting system’s “hands-on equipment”.<sup>113</sup> The protective case of an ICP scanner was opened up to reveal its sensitive interior parts. Several computer configurations were modified but never restored. These actions were abnormal and reckless. They could easily have created problems that would prevent the system from functioning or from accurately recording votes in an election. Lenberg’s own tests demonstrate that some scanner settings can prevent ballots from scanning properly.

159. Another example is that the photographs produced by SullivanStrickler show Coffee County election hardware connected to unauthorized devices—a UEFI USB drive and external hard drive—and running unauthorized software. SullivanStrickler’s devices and software are uncertified and untested for use with Georgia’s election hardware and software. They may have flaws or incompatibilities that cause damage.

160. The risk of contamination increases if SullivanStrickler’s devices and software were used in other digital forensic work, where malware may be encountered frequently. It is my understanding that SullivanStrickler performs digital forensic work routinely for a variety of clients. And, as noted earlier, a write-blocker was not used during the data acquisition to prevent mistakes by the technician or transmission of malware.

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<sup>113</sup> Jeffrey Lenberg Deposition Tr: 17:1-7

161. There are second-order effects to consider as well. If hardware with a broken chain of custody is ever connected to a network, other hardware, or removal media, there is a risk that malware present on the device will spread to other devices, and then from those devices to other devices, like a contagion. The EMS acts as a hub. The EMS puts data on removable media (CompactFlash cards, USB drives) which is installed in scanner/tabulators (ICPs) and the ballot marking devices (ICXs) before the election. After the election, that removable media comes back to the EMS so that it can extract data and reprogram them for the next election. The EMS is also connected via a local-area network (LAN) to the ICC scanner/tabulator so that data can be exchanged both ways easily. All of these devices are interconnected. Every use is a new opportunity for contagious transmission of malware between them.

162. The risk of contagious transmission increases when removable media is reused. The evidence shows that Coffee County reuses removable media for several elections, such as the CompactFlash cards used with ICP scanner/tabulators. Reuse of removable media is a bad security practice because it provides a convenient vehicle for malware to move between devices in both directions—from the EMS to other devices, and from devices back to the EMS. It is analogous to intravenous drug users sharing needles. The U.S. Election Assistance Commission (“EAC”) recommends using “single-use memory devices



to transfer election results from the voting system tabulator to the EMS” and “write-once or read-only removable media should be used, where possible”.<sup>114</sup>

163. Because of these concerns, it is common practice for election hardware accessed without authorization or with a broken chain of custody to be decommissioned and not used in future elections, and then quarantined and never connected to a network, other hardware, or removable media. When equipment chain of custody was broken recently as a result of similar incidents<sup>115</sup> in Arizona, Pennsylvania, Colorado, and Michigan, the election hardware was quickly decommissioned by their Secretaries of State.

164. The Cybersecurity and Infrastructure Security Agency (“CISA”) recommends election officials address “Incident Eradication” by taking several steps: remove compromised machines, block known malicious infrastructure, reset account credentials, and implement additional controls.<sup>116</sup> I strongly agree.

165. The State Defendants represented that the EMS and ICC were removed from Coffee County on June 8, 2021, though its removal was not attributed to unauthorized access. The remaining election hardware remained in service,

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<sup>114</sup> U.S. Election Assistance Commission, “Best Practices for Election Technology”, 19, [https://www.eac.gov/sites/default/files/electionofficials/security/Best\\_Practices\\_for\\_Election\\_Technology\\_508.pdf](https://www.eac.gov/sites/default/files/electionofficials/security/Best_Practices_for_Election_Technology_508.pdf)

<sup>115</sup> Many of the participants in Coffee County activities are implicated in these incidents too.

<sup>116</sup> Department of Homeland Security, “Incident Handling Overview for Election Officials”, 5, [https://www.cisa.gov/sites/default/files/publications/incident\\_handling\\_elections\\_final\\_508.pdf](https://www.cisa.gov/sites/default/files/publications/incident_handling_elections_final_508.pdf)

through several elections, until it was replaced soon after September 23, 2022.<sup>117</sup> Before that time, it was not quarantined and was connected to other hardware via removable media several times. The failure to immediately quarantine *all* affected hardware may have already resulted in the contamination of other devices, including the replacement EMS and ICC, which are still in use.

### *Implications of Distribution of Election Software*

166. Unfortunately, control over the election software and data cannot be reestablished after the fact. The horse has left the barn.

167. The software and data were distributed widely in the first month and 23 months have passed since. No one can know how many copies exist around the world or who possesses them. Digital data is easy to duplicate, transmit, and conceal. Copies may have been traded or sold. Copies may be readily available online for public download.

168. Unregulated possession of the software and data carries an inherent risk of *further* distribution, both intentional and unintentional. Copies may be in the possession of parties who would willingly distribute them further or simply fail to keep them safeguarded. Every additional copy in circulation has the potential to compound all of the other negative effects. In other words, all risks are lower if

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<sup>117</sup> <https://sos.ga.gov/news/raffensperger-replace-coffee-county-election-equipment-end-distraction-local-election>

three adversaries obtain copies rather than four, which is still far better than 40 or 400.

169. Unauthorized copying and distribution of election software and data does not only impact Coffee County. All Georgia counties use the same software. And beyond Georgia, many other jurisdictions in the United States use similar software. They all share in the implications of its distribution.

*Distribution Emboldens and Increases Adversaries*

170. Most voting system vendors, including Dominion Voting Systems, strictly limit who may possess and review their proprietary software code. I am familiar with the terms and conditions in several vendor sales contracts. They grant customers a non-transferrable license to *use* the software and prohibit any duplication, sharing, or inspection of the software or its source code. Often, the state government will not even possess a copy of the source code; the vendor will place it in secure escrow instead.

171. Access to devices with election software installed is usually strictly controlled. The election office and storage areas keep sensitive equipment behind locked doors with few keys and may monitor them with cameras or personnel. Election hardware includes locks and tamper-evident seals to restrict access to their data storage. Together, these measures have made election software difficult to obtain without investing significant time and extensive resources.

172. Unfortunately, the Coffee County data breach and uncontrolled software distribution have significantly lowered the resources required for adversaries to obtain Georgia’s election software and data. Obtaining the software today may be as easy as clicking a link. With slightly more effort, adversaries could bribe, rob, con, or otherwise persuade someone in possession of the software.

173. Greater availability of the software expands the landscape of potential threats. Voting system security experts like myself have historically considered the most dangerous potential adversaries to be large foreign nation states, who have extensive resources. However, the widespread distribution of the Dominion software greatly expands the universe of potential adversaries. It lowers the effort required for adversaries with extensive resources, and it creates *new* opportunities for adversaries with modest or even meager resources—from small nation states down to a person working alone in a basement. More adversaries increases the potential threats to election systems and increases the likelihood one will succeed in causing an incident.

*Distribution Facilitates Disinformation*

174. A highly likely consequence of the distribution of election software is that knowledge about its code and operation will be used in disinformation

campaigns. This is not theoretical. There are *many* recent examples to serve as warnings.

175. The most prominent example has to be the Allied Security Operations Group’s Antrim report (“ASOG Report”). The report was authored by ASOG’s Russell Ramsland on December 13, 2020 regarding the Dominion voting system in Antrim County, Michigan.<sup>118</sup> Among its many findings, the ASOG Report concluded the voting system was “intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results.” Its most cited and incendiary claim was that ASOG examined the voting machine logs and found there was a 68% error rate.

176. Almost every finding in the ASOG Report was quickly debunked by experts, including the purported 68% error rate. On December 16, Chris Krebs, the former chief of CISA, testified to the Senate Homeland Security and Governmental Affairs Committee that the ASOG Report was “factually inaccurate” and debunked several of its claims.<sup>119</sup> Dr. Alex Halderman wrote an analysis for the Michigan Secretary of State in which he refutes ASOG’s findings and explains how ASOG

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<sup>118</sup> The report was produced for *Bailey v. Antrim County*, Michigan Circuit Court for the County of Antrim, Case No. 20-9238-CZ, a case in which four SullivanStrickler employees, Conan Hayes, and Todd Sanders traveled to Antrim in December 2020 and made forensic copies of the EMS, CompactFlash cards, and USB drives, which were then analyzed by them and by Phil Waldron, Doug Logan, James Penrose, Ben Cotton, and Jeffrey Lenberg.

<sup>119</sup> Chris Krebs, Testimony on “Examining Irregularities in the 2020 Election”, December 16, 2020. <https://www.rev.com/blog/transcripts/fired-election-official-chris-krebs-senate-testimony-on-2020-election-security-transcript>

egregiously misconstrued the logs by counting benign warnings, multiple attempts to scan a ballot, and other expected behaviors as “errors”. Normal system operation was presented as nefarious.

177. The ASOG Report made an impact anyways. Matt Masterson, senior advisor on elections at CISA, described its significance to *The Washington Post*:

Of all the ways in which Ramsland pushed the stolen-election narrative, arguably the most damaging was an ASOG report on Dominion machines in Michigan’s rural Antrim County, said Masterson, the senior cybersecurity adviser who was then focusing on elections at DHS. Repeatedly and at key moments, Masterson said, ASOG was the source of morsels of inaccurate information that shaped public perception. [...]

“It wasn’t just that the president would tweet about their stuff. It was all these little nuggets and grist that they provided or that were cited to them in testimony or in the ‘kraken’ cases. It provided the appearance of substance and fact to something that had no substance or fact,” said Masterson, [...] <sup>120</sup>

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<sup>120</sup> Emma Brown, Aaron C. Davis, Jon Swaine, and Josh Dawsey, “The Making of a Myth”, *The Washington Post*, May 9, 2021. <https://www.washingtonpost.com/investigations/interactive/2021/trump-election-fraud-texas-businessman-ramsland-asog/>

178. On December 14, the same day the Michigan judge authorized its release, the ASOG Report made it all the way to the desk of President Trump, who forwarded it to Attorney General Barr for review. President Trump also tweeted about the report several times, saying it revealed massive fraud. The ASOG Report became the centerpiece of a December 16 draft Executive Order to seize all voting machines and to appoint a special counsel for a nation-wide fraud investigation.<sup>121</sup> These measures are consistent with proposals contemplated by President Trump at a meeting in the Oval Office on December 18 with Michael Flynn, Sidney Powell, and others.<sup>122</sup>

179. ASOG used their access to the election software, which the general public did not have, to misrepresent its features and its reliability in order to influence the outcome of an election which had already concluded. It is difficult to imagine how examining election software could result in more consequential disinformation than that which almost causes the seizure of voting machines and risks the peaceful transfer of power on which democracy depends.

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<sup>121</sup> Betsy Woodruff Swan, “Read the Never-Issued Trump Order That Would Have Seized Voting Machines”, *Politico*, January 21, 2022. <https://www.politico.com/news/2022/01/21/read-the-never-issued-trump-order-that-would-have-seized-voting-machines-527572>

<sup>122</sup> Jonathan Swan and Zachary Basu, “Inside the Craziest Meeting of the Trump Presidency”, *Axios*, February 2, 2021, <https://www.axios.com/2021/02/02/trump-oval-office-meeting-sidney-powell>

## *Distribution Facilitates the Subversion of Election Software*

180. A core cybersecurity principle, borrowed from the field of cryptography, is Kerckhoff's principle: "One ought to design systems under the assumption that the enemy will immediately gain full familiarity with them."<sup>123</sup> A popular and terser version is Shannon's maxim: "The enemy knows the system."<sup>124</sup>

181. This is sound security advice for designing a cryptographic system, and it applies well to network, hardware, and software design. Its intent is to discourage over-reliance on obscurity as a security defense. If one builds a cipher device to assist the military in sending coded messages, one should build it with the expectation that another military will obtain one of the devices eventually and deconstruct it to learn its secrets.

182. It is tempting to apply Kerckhoff's principle to the distribution of election software, to shrug our shoulders and reason that the "enemy" already had a copy of the "system" so little has changed. That would be a mistake. There is a big difference between good design advice and the *actual circumstance* of an adversary possessing the "system." One can design a system for the *eventual* circumstance and also hope it arrives late. In the actual circumstance, years may pass before one adversary "knows the system," and years more before the second

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<sup>123</sup> Auguste Kerckhoffs von Nieuwenhof, "La Cryptographie militaire," 1883.

<sup>124</sup> Attributed to cryptographer Claude Shannon.



and third do. Moreover, my experience has been that election software frequently fails to heed Kerckhoff's principle and overly relies on obscurity, physical protections, access controls, and procedures to guard its secrets. *If one failed to plan for the day the enemy eventually knows the system, then its secrets are quickly discovered when that day actually arrives.*

183. A country, organization, or person can develop techniques or code to subvert the software's intended operation. Possession of the software is *invaluable* to such a process. The software is more than just a blueprint. It is a functional copy that can run on standard, commercial hardware. The precise details of its operation can be closely inspected. An adversary can test theories and evaluate the results. An adversary can craft modifications to the software, verify they work, and then refine them to be more potent or less detectable. Any adversary with the software can build a hands-on engineering laboratory, or several.

184. For example, Doug Logan created several virtual machines from the forensic images and shared them with his collaborators. These are easy-to-use versions of Georgia's election software. Logan produced a screenshot in which the ICC software appears to be running in a virtual machine, and the computer is monitoring the processes (various tasks the software is doing) in one window, while another window runs a program called Immunity Debugger.<sup>125</sup> Immunity

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<sup>125</sup> Exhibit 28, Screenshot, originally titled "drillingIn.png"

Debugger is described as “a powerful new way to write exploits, analyze malware, and reverse engineer binary files.”<sup>126</sup> In the screenshot, the dense letters and numbers on a black background show the actual software code as it is being run. The buttons above with symbols suggesting play, pause, and rewind are for controlling the operation of the software step-by-step. Logan testified, “The only thing that I ever recall using the debugger for was to try to figure out how they were handling encryption keys on the device.”<sup>127</sup> He also testified that he believes the encryption keys on the Dominion system are not well protected and “the encryption key that’s more than enough to change results on the [ICP scanner’s CompactFlash] cards”.<sup>128</sup>

185. It is difficult to predict what subversions might result from such an analysis. The range of possibilities is large. It would depend on each adversary’s particular set of skills and resources, what their analysis discovered, and their goals and priorities.

186. Examples of potential subversion can be found in Dr. Alex Halderman’s July 2021 expert report, *Security Analysis of Georgia’s ImageCast X Ballot Marking Devices*.<sup>129</sup> Dr. Halderman and Dr. Springall approached their

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<sup>126</sup> Immunity Debugger product website, <https://www.immunityinc.com/products/debugger/>

<sup>127</sup> Doug Logan Deposition Tr: 169:9-13

<sup>128</sup> Doug Logan Deposition Tr: 49:12-22

<sup>129</sup> Dr. J. Alex Halderman, *Security Analysis of Georgia’s ImageCast X Ballot Marking Devices*, 2021. (Sealed)

analysis of the vulnerabilities in the ICX in a similar fashion, but with *far less* software and data at their disposal than the software and data collected in Coffee County by SullivanStrickler. Over approximately 12 person-weeks, they identified multiple serious vulnerabilities and developed proof-of-concept attacks that could allow malware to subvert normal operation. These included attacks requiring minimal access to devices, and that could spread from device to device.

187. It would be naive to believe others are not capable of doing the same. The necessary skills are possessed by most nation states as well as hundreds of individuals around the world. The data collected by SullivanStrickler included the Android software that controls every ICX used in the State of Georgia, which is the very same software analyzed by Dr. Halderman and Dr. Springall. Today, the Coffee County election software has been out in the wild for 98 weeks, more than eight times as long as was used for their analysis.

188. A relatively easy subversion would be to prevent election systems from operating at all or from operating properly—a denial of service, slowing down the system, or other erratic behavior. It would not require much technical skill to cause damage. It could be as easy as deleting a file the system needs to operate. With basic skills, one might leverage code from one of many readily-available strains of ransomware that have become a common threat. The effect could be to create long lines or to prevent voters from casting votes. Preventing the reliable, orderly

conduct of elections could create stress and chaos, affect the election results, and would almost certainly diminish the public's trust in the voting system and in the election outcomes. Georgia's reliance on ballot marking devices to generate and print ballots greatly amplifies the impact such malfunctions would have on a polling place.

189. Given a forensic copy of a voting system component, and not merely the election software that runs on it, an adversary can analyze the election software in situ. An adversary can discover the various defenses and precise "hardening" measures that Dominion has taken to learn what is well protected and what is not. An adversary can develop techniques for hiding malware in out-of-the-way places to make it less detectable.

190. An adversary can identify vulnerabilities in the operating system or other libraries of code that can be exploited outside of the election software itself. Operating systems used in election components are not upgraded as frequently as in a typical office or home. Georgia's election software is Dominion Democracy Suite 5.5-A which was certified by the EAC in January 2019. Since then, there have been few updates (which Georgia does not use). There are few updates because, in part, the certification processes favor static, stable, well-tested systems over regular upgrades, bug fixes, and security patches which may have side effects that impact reliability. The downside of this approach is that older software often

has known vulnerabilities, which adversaries diligently catalog and stockpile, that remain unpatched and ripe for exploitation. The static nature of the software is a strength when well protected and a weakness when exposed to outsiders.

191. A moderately skilled adversary could reverse engineer the software. The election software is mostly compiled code which is efficient for computers to read, but not human readable. There are software programs designed to decompile and deobfuscate the code to make it human readable again. Then the code can be studied to understand which sections control which functions of the voting system. An adversary might rewrite sections of the code. They could add additional logic or remove protections and defenses. The code could be programmed to cheat or otherwise misbehave. Then the human-readable code could be recompiled for use by computers. The voting system software has features to help detect any changes to the code, but these features reside in the same software and could be reprogrammed at the same time.

192. Another target for subversion is the software's cryptography. Voting systems rely on cryptography extensively to validate the integrity and authenticity of software and data. They use cryptographic algorithms, which use cryptographic keys (not so different from passwords), to encrypt and decrypt data. If keys are kept private and secure, they can be used to digitally "sign" data to guarantee it comes from an authentic source and has not been altered since its signing.

193. A skilled adversary might discover how to subvert the cryptography in the system. Breaking cryptography directly is an unlikely, herculean task, but it is not uncommon to find weaknesses in the implementation of cryptography that offer fertile ground. The Georgia voting system software and data will indicate which cryptographic algorithms are being used and contain many cryptographic keys and other secret data. The EMS in particular holds many keys that it uses to encrypt and sign the data it provides to other devices, and to decrypt and validate the data they send back to it. The good news is that most of the keys are specific to a single election and will have no use or value in future elections. However, some keys or other secret data may be reused for every election, or studying the keys may reveal how they are generated and used. For example, if key creation incorporates the election name, date, or other knowable information an adversary could forge a key by using the same inputs. It is a bad practice, but one I do not rule out. In the worst case, the system may have a permanent, default password like “abcde”, as a popular but now out-of-use voting machine once did. One cannot predict whether the software’s use of cryptography is well designed and will withstand exposure.

194. Without cryptography, a voting system loses the ability to differentiate between legitimate, authorized data and fraudulent or harmful data. It becomes vulnerable to many attacks. An adversary can install different software or malware.

Edited or forged data can be accepted as legitimate. QR codes that store vote selections can be altered but appear valid. Vote totals, cast vote records, ballot images, and log files could be changed. In fact, there is little that could not be manipulated. It would be a potent attack.

195. A robust post-election audit of paper ballots is capable of detecting changes to the election results if the paper ballot is trustworthy. However, by statute, post-election audits in Georgia are rare, far too infrequent to offer a strong defense. Dr. Philip Stark has stressed this point and elaborated on the limitations of Georgia's paper ballots and post-election audits in his declarations in this case.<sup>130</sup>

*Greater Access Facilitates Deploying Weaponized Code*

196. After developing techniques or weaponized code, an adversary must then gain access to election hardware with enough opportunity to put them into action. If hardware is not connected to a network, it requires physical access. Some of the obstacles to gaining physical access were described previously, such as access-restricted rooms, locks, and tamper-evident seals. As with obtaining the software, adversaries need sufficient resources to gain access with enough opportunity.

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<sup>130</sup> Dr. Philip Stark, March 9, 2022 Expert Report, <https://www.stat.berkeley.edu/~stark/Preprints/cgg-rept-9.pdf>

197. Unfortunately, the Coffee County data breach portends a lower threshold for gaining that access. Election office staff invited in *strangers*, with no expertise in voting systems, and gave them free rein for hours. Software and data was copied and removed from the premises. Voting machines were studied as their operational settings were changed using a trial-and-error methodology. A vote tabulator was broken open and its inner parts scrutinized. Access-restricted rooms, passwords, locks, and tamper-evident seals offered no defense at all.

198. The SullivanStrickler team and others present on January 7, 2021 had access to Coffee County election hardware for over seven hours. The group worked without supervision by election officials. Misty Hampton, the Coffee County Election Director at the time, told *The Washington Post* she did not know where the group went or exactly what they did while they were there. “I’m not a babysitter,” she said.<sup>131</sup>

199. Based on their professional backgrounds, several individuals present that day, as well as on the seven days of subsequent visits, appear to have had sufficient access, skills, and opportunity to perform malicious manipulations—

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<sup>131</sup> Emma Brown and Amy Gardner, “Georgia County Under Scrutiny After Claim of Post-Election Breach”, *The Washington Post*, May 13, 2022. <https://www.washingtonpost.com/investigations/2022/05/13/coffee-county-misty-hampton-election>



including variations of the [REDACTED] proof-of-concept attacks detailed in Dr. Halderman's report.<sup>132</sup>

200. Many similar data breaches transpired around the country last year, often facilitated by insiders. I have logged 11 reported attempts in the United States since November 2020 to access election hardware to copy its data, 10 of which were successful. In one case, election hardware was taken away and returned six months later. Some election officials were willing participants. Some election officials were persuaded to give access by people who misrepresented the facts or their authority. In all of them, strangers gained unprecedented access to election hardware.

201. Similarly, the likelihood of manipulation attempts has risen. In the June 2022 primary in Pueblo County, Colorado, a Dominion ICX ballot marking device in a vote center alerted poll workers that it had detected a change to its USB devices. It is possible someone attempted to remove the legitimate USB drive or to install an unauthorized device. The *Associated Press* wrote, "The incident in Pueblo County highlights a troubling reality, that any voter propelled by

---

<sup>132</sup> Dr. J. Alex Halderman, *Security Analysis of Georgia's ImageCast X Ballot Marking Devices*, 2021. (Sealed)

conspiracy theories could try to tamper with voting machines.”<sup>133</sup> In my view, it is a canary in the coal mine. I expect more attempts like it.

202. It is easier to gain access to election hardware and software now than it was only a few years ago, and disinformation has motivated ordinary people to test the limits of the system and to take risks they would not have attempted previously. Easier access and more motivation increases the number of adversaries who may try to tamper with election systems and increases the likelihood some will succeed in causing incidents.

#### *Increased Risks Require Urgent Action*

203. Security risk is measured in part by assessing the *likelihood* a negative incident will occur. Wide, uncontrolled availability of Georgia’s election software substantially increases the likelihood of an incident. Adversaries motivated by disinformation substantially increases the likelihood of an incident. Convenient access to Georgia’s election offices and hardware substantially increases the likelihood of an incident. Thus, the election security risks have increased substantially for every Georgia county.

204. Though the threat landscape has changed, the risk mitigations recommended by election security experts have not. They are: rigorous access

---

<sup>133</sup> Christina Cassidy and Colleen Slevin, “Voting Machine Tampering Points to Concern for Fall Election”, *Associated Press*, August 25, 2022, <https://apnews.com/article/2022-midterm-elections-voting-presidential-conspiracy-theories-colorado-53c90f7afe304e26eace79b4699181bb>

controls, layers of security defenses, resilience planning, hand-marked paper ballots, strong chain of custody of cast paper ballots, and robust post-election audits. These election best practices, cybersecurity controls, and the principles for evidence-based elections were developed with these threats in mind. Increased risks does not demand some new cure. It demands increased *urgency* for implementing the recommendations fully. The State of Georgia should act urgently and has not.

Executed on this date, December 5, 2022.

A handwritten signature in cursive script, reading "Kevin Skoglund", written in black ink above a horizontal line.

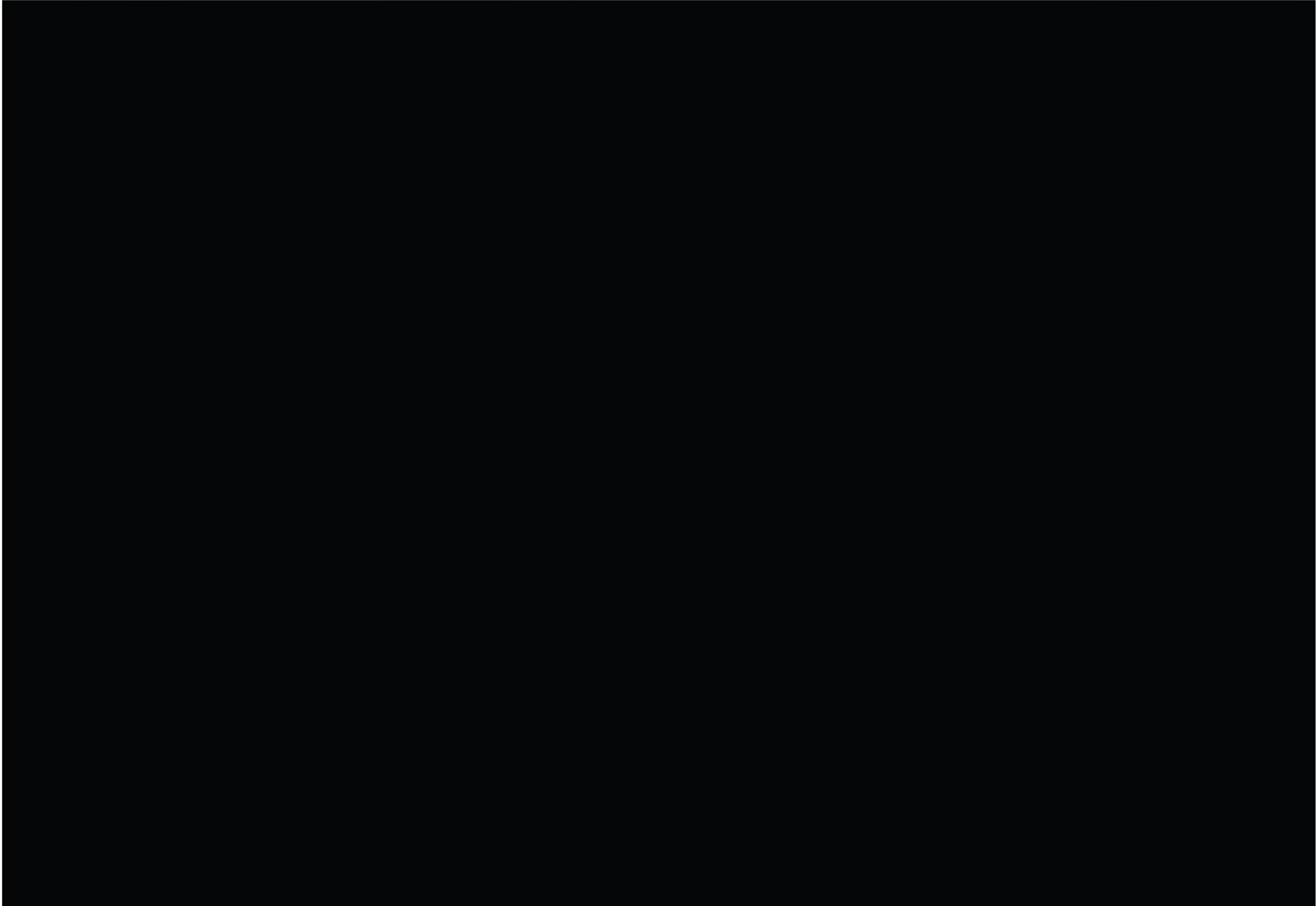
Kevin Skoglund

E  
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T



SullivanStrickler

🕒 4w



Jan 1, 2021

**Jennifer Jackson**

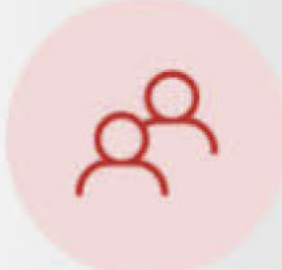
Hi! Just handed back in DC with the Mayor. Huge things starting to come together!

Most immediately, we were just granted access -by written invitation! - to the Coffee County Systems. Yay! Putting details together now with Phil, Preston, Jovan etc. Want to give you a heads up for your team. Will be either Sat or Sun this



New Message





SullivanStrickler

🕒 4w



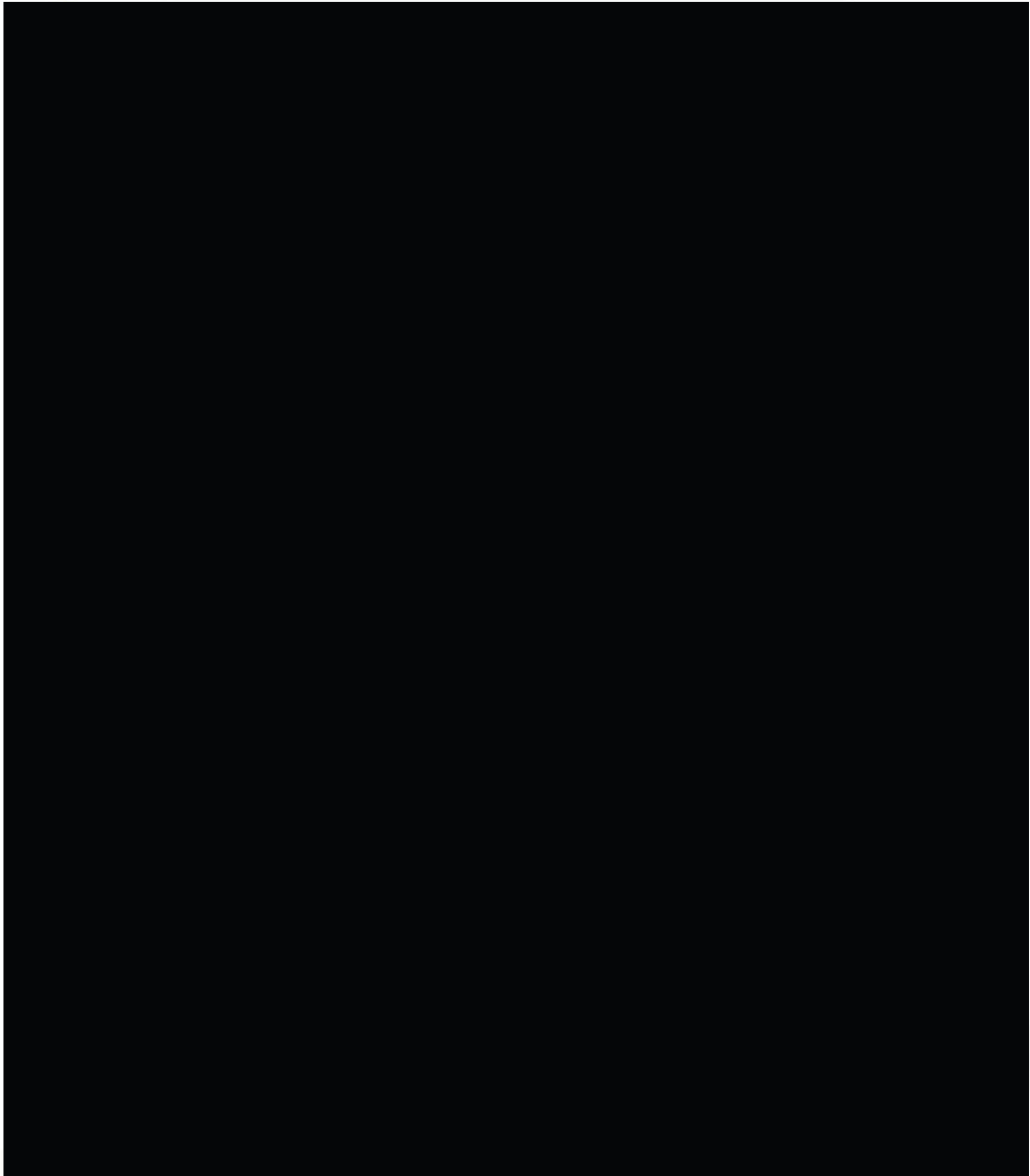
with Bill, Preston, Jovan

etc. Wan' Jan 1, 2021 a heads up for your team. Will be either Sat or Sun this weekend. More soon! :))

This was from Katherine this am, of course not the official word but wanted to share as a potential heads up

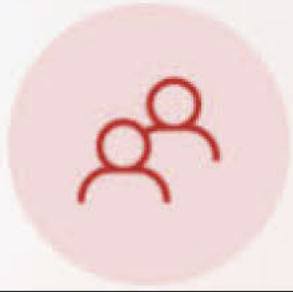
2:18 PM

JJ



New Message





SullivanStrickler

🕒 4w



**Greg Freemyer**

Would this be a 3? 4? 5?  
person response team?

Should we reach out to  
Penrose for potential  
guidance?

GF

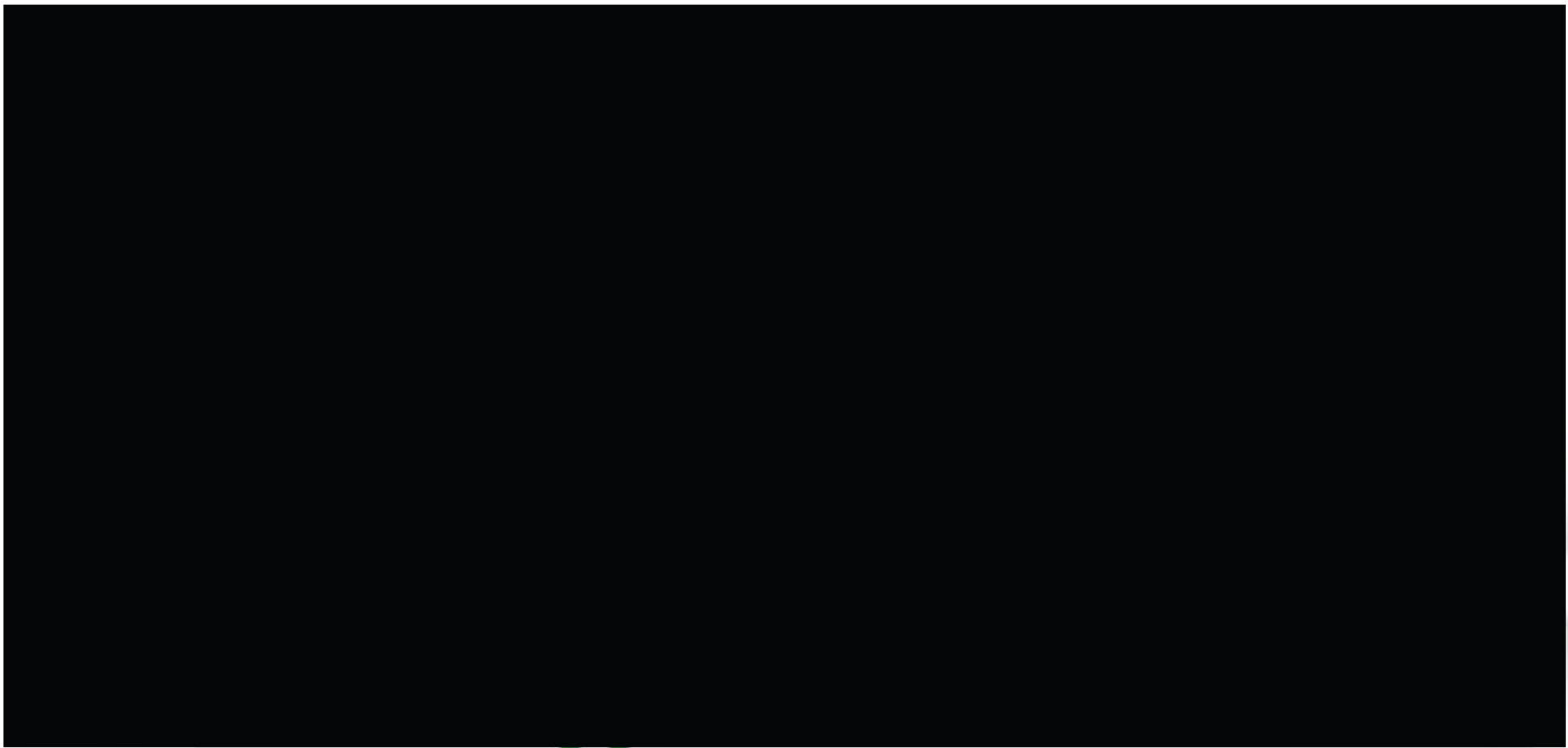
3 hrs from the vault 2:36 PM

**Paul Maggio**

Let's wait for the request. If  
they need us, they will call

PM

2:37 PM



New Message



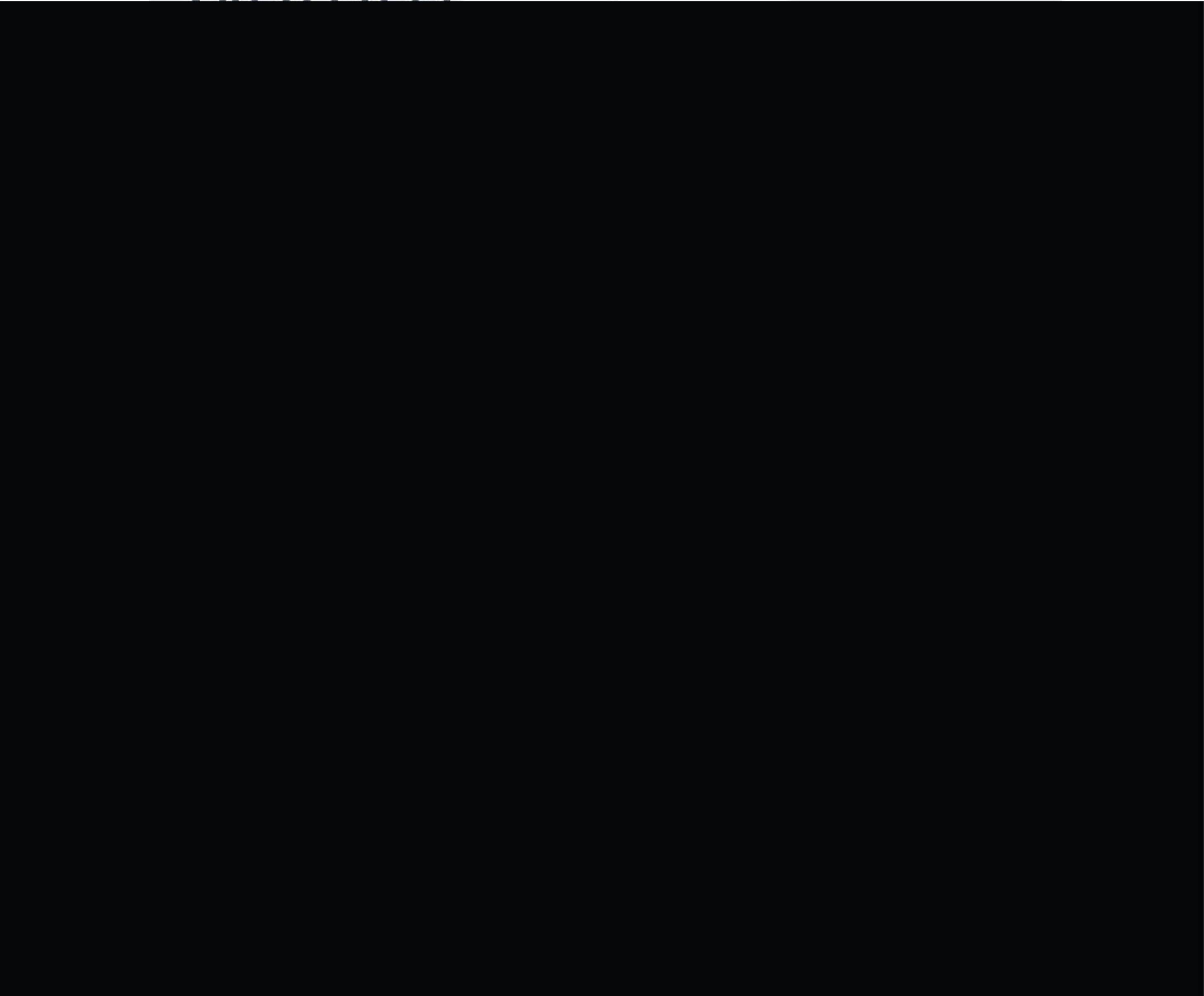


SullivanStrickler

🕒 4w



Greg Freer Jan 1, 2021



Greg Freemyer

Todd just gave me a heads up about Coffee County- just said this weekend

GF

3:12 PM

Paul Maggio

Ok 3:13 PM

PM

Greg Freemyer

Todd says information is coming in slowly, so the team is leaning towards



New Message







SullivanStrickler

🕒 4w



PM

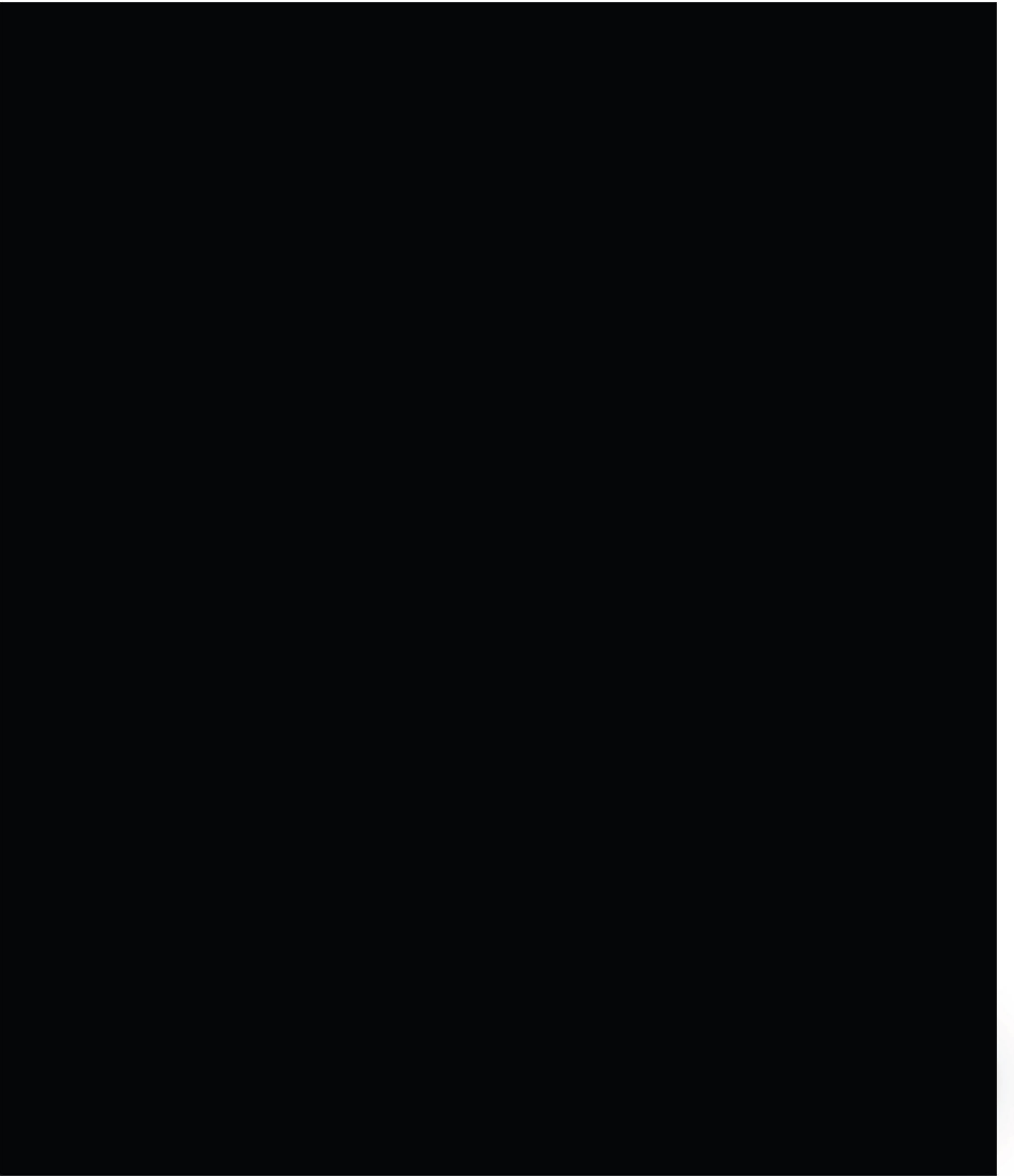
Ok 3:13 F Jan 1, 2021

Greg Freemyer

Todd says information is coming in slowly, so the team is leaning towards Sunday for the work.

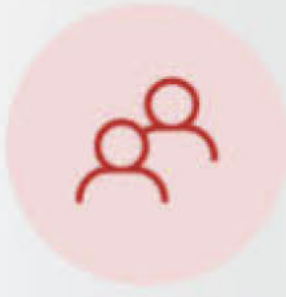
GF

4:18 PM



New Message



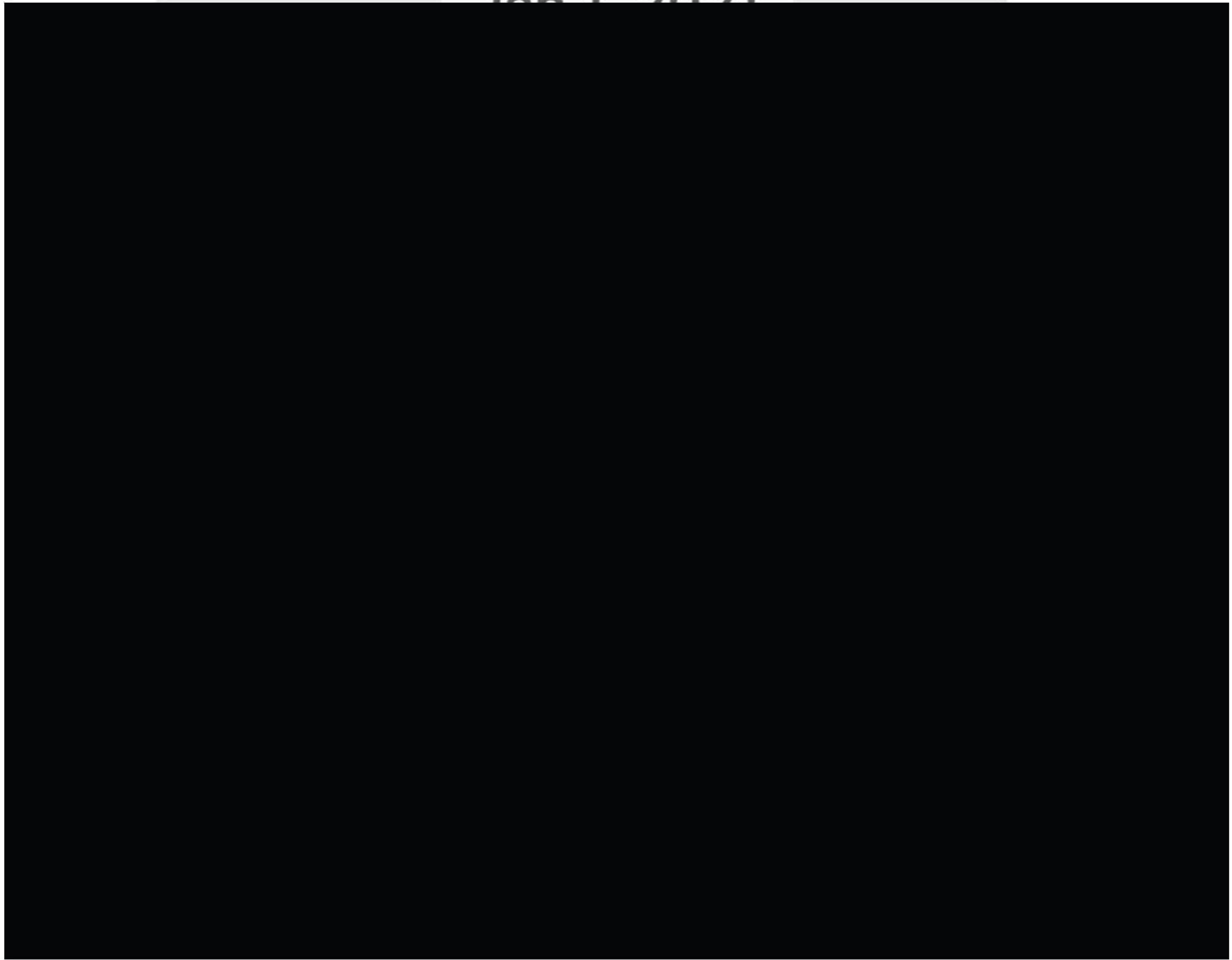


SullivanStrickler

🕒 4w



Jan 1, 2021



GF

Is anyone beside me in the Wicr Pro group Todd is posting to?

4:41 PM

Not I as expected

4:42 PM



JJ

**Jennifer Jackson**

Not in that group

4:45 PM



Greg Freemyer

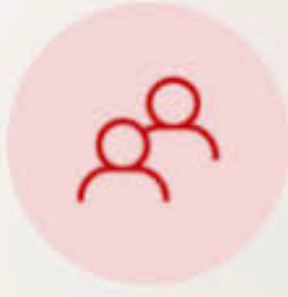
I'll continue to forward what he is saying here

4:47 PM



New Message





SullivanStrickler

🕒 4w



Jan 1, 2021

Greg Freemyer

I'll continue to forward what he is saying here.

4:47 PM

GF

Jan 2, 2021

Greg Freemyer

Todd says tomorrow appears to be off the table. Legal process going slow

12:46 PM

GF

**Jennifer Jackson**

Who is Preston Halliburton? I got a strange email from this guy asking me to call him about the hearing on Monday????

1:11 PM

JJ

Preston was mentioned in the message from Katherine. Maybe she gave him your Email?

1:13 PM



New Message





SullivanStrickler

🕒 4w



the message from  
 Jan 2, 2021  
 Katherine.  
 Maybe she gave him your  
 Email?  
 1:13 PM

**Jennifer Jackson**

Ok will call him now 1:13 PM

JJ

You're correct- he wants us for Monday in Fulton 1:30 PM



**Greg Freemyer**  
Monday might be interesting.

Knoxville remote is real for 2 custodians.

I think Coffee County is maybe.

GF

And now Fulton. 2:02 PM

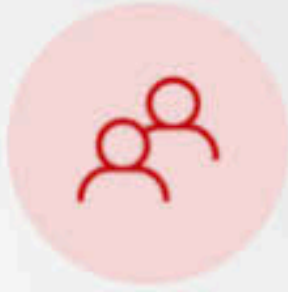
**Paul Maggio**

Nothing will happen in GA



New Message





**SullivanStrickler**

🕒 4w



GF

And now Fulton.

2:02 PM

Jan 2, 2021

**Paul Maggio**

Nothing will happen in GA until after the election on Tuesday. No judge is going to let those machines be touched before then.

PM

2:30 PM

**Jennifer Jackson**

This is getting more interesting. Just randomly learned that one of the DC attorneys coming on Monday is the cousin of my mentor. He's a partner at Nelson Mullins. Hope we get to meet him too.

JJ

7:36 PM

**Greg Freemyer**

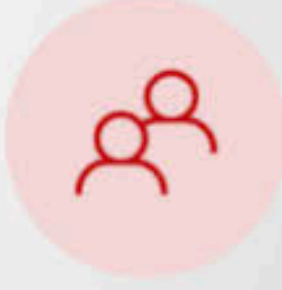
Interesting- very good to see more mainstream litigators involved

I haven't talked to Preston yet. He let me know he is



New Message





SullivanStrickler

🕒 4w



litigators i...

Jan 2, 2021

I haven't talked to Preston yet. He let me know he is trying to organize a zoom call with the legal team and he wants me to join. That's all the detail I have.

7:39 PM

GF

Jennifer Jackson



8:03 PM

JJ

Jan 3, 2021

Greg Freemyer

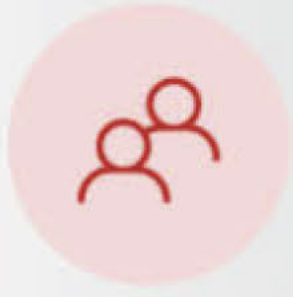
Fyi: I emailed Preston yesterday afternoon. He said he wanted to have me join a legal team conf call either last night, or this morning.

Neither happened.



New Message





SullivanStrickler

🕒 4w



morning.

Jan 3, 2021

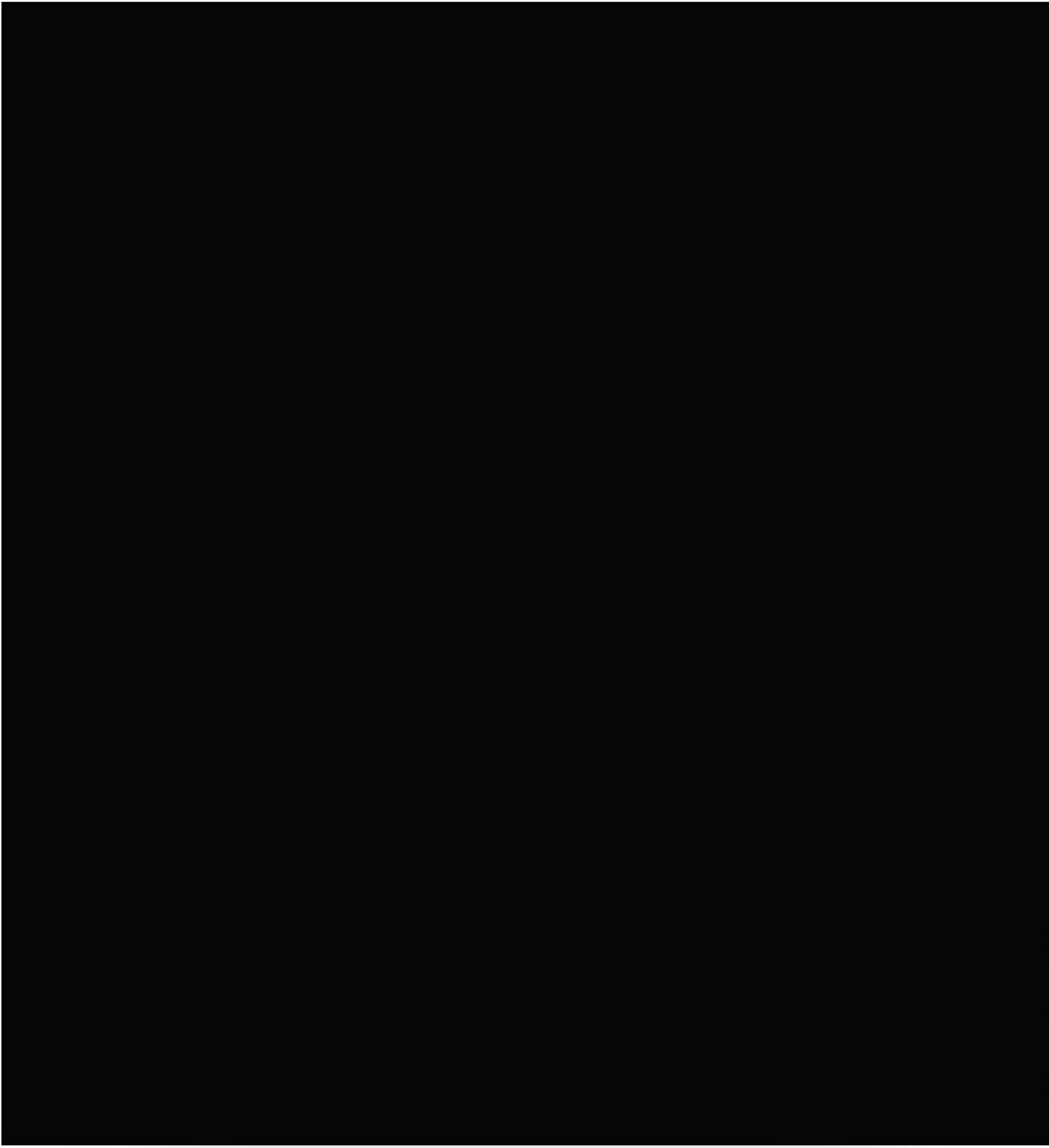
Neither happened.

I have clarity as to what the request is for tomorrow.

Maybe he just needs me to join a zoom hearing at some point?

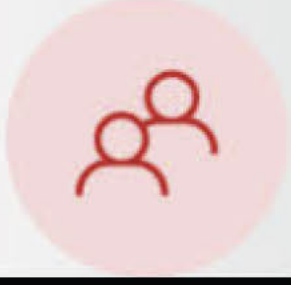
"I have NO clarity ..."

1:06 PM



New Message





SullivanStrickler

🕒 4w



I just talked to the legal team. Coffee County is NOT in play for tomorrow. Fulton County may be, but it will be a smaller scale. Maybe Paul & I.

GF

5:42 PM



Jan 5, 2021

Greg Freemyer

All,

The Georgia Petition hearing to gain access to the paper mail-in ballots for Fulton County has been



New Message





**SullivanStrickler**

🕒 4w

**Greg Freemver**

All,

Jan 5, 2021

The Georgia Petition hearing to gain access to the paper mail-in ballots for Fulton County has been rescheduled for tomorrow at 4pm. They are hoping the inspection will be Thursday or Friday. I think Paul & I will be the only 2 people needed. That is unless we get access to a lot more thumb drives / compactflash than I expect.

Fulton has ~400 voting locations, so conceivably 800 thumbs and 800 compactflash! More likely is a couple dozen, which is something I can likely manage by myself.

Coffee County also won't



New Message





SullivanStrickler

🕒 4w



manage by myself

Jan 5, 2021

Coffee County also won't happen until after the Wed hearing at the soonest. Todd said the Feds (FBI?) may have to do that one instead of us.

GF

9:12 AM

Jan 6, 2021

**Jennifer Jackson**

Who do we need in coffee county?

JJ

7:27 PM

**Paul Maggio**

Greg is going to Knoxville first thing in the AM. Karuna has 2 phones and web mail accounts scheduled

PM

7:29 PM

**Jennifer Jackson**

I'm aware, you me and Tamara?

JJ

7:29 PM

**Paul Maggio**

May be Jim, Jennifer and I



New Message





SullivanStrickler

🕒 4w



Jennifer Jackson

Jan 6, 2021

Who do we need in coffee county?

JJ

7:27 PM

Paul Maggio

Greg is going to Knoxville first thing in the AM. Karuna has 2 phones and web mail accounts scheduled

PM

7:29 PM

Jennifer Jackson

I'm aware, you me and Tamara?

JJ

7:29 PM

Paul Maggio

May be Jim, Jennifer and I

PM

7:29 PM

Jennifer Jackson

Cool

JJ

Ready to roll 7:30 PM

Greg Freemyer

You should try to get a 2nd cellebrite dongle??

GF

7:31 PM



New Message





Coffee\_County\_Forensics



# Coffee\_County\_Forensics

6 members

Jan 6, 2021

Jim Penrose added you to the group.

**Jim Penrose**

@Scott Hall meet @Paul Maggio from SullivanStricker

7:35 PM



New Message





# Coffee\_County\_Forensics



Jim Penrose added you to the group.

Jan 6, 2021

**Jim Penrose**

@Scott Hall meet @Paul  
Maggio from SullivanStricker

7:35 PM



Jim Penrose invited 1 person to the group.

**Jim Penrose**

@Paul Maggio will you be team  
lead on this?

7:37 PM



**Charles Bundren**

We need cell numbers to  
identify who they are for the  
people at the elections HQ.

7:38 PM



**Jim Penrose**



Paul Maggio



Send Message



New Message





**Jim Penrose**

Jan 6, 2021



**Paul Maggio**



[Send Message](#)



Paul can you post the rest of the team

7:39 PM

+👤 Jim Nelson accepted an invitation to the group from Jim Penrose.

**Paul Maggio**

Calling everyone now

PM

I will lead

7:55 PM

**Jim Penrose**

Thanks Paul

7:56 PM

**Paul Maggio**

Names coming shortly



5 Total - Paul Maggio (404)



New Message





# Coffee\_County\_Forensics



Jan 6, 2021

**Paul Maggio**

Names coming shortly

5 Total - Paul Maggio (404)

Jennifer Jackson

Karuna Naik

Jim Nelson

Larisa Tulchinsky

Please provide address and POC name and phone 8:36 PM

PM

Scott Hall

I will very shortly 8:42 PM

Paul please give me a call on Signal

Scott G Hall



New Message





# Coffee\_County\_Forensics



Paul please give me a call on Signal

Jan 6, 2021

Scott G Hall



10:26 PM



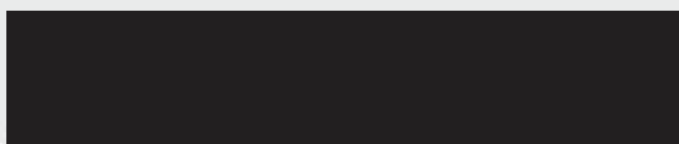
Jan 7, 2021

Scott Hall

Important to text POC Before coming in. I'm looking into plane to fly down. How is team going down?

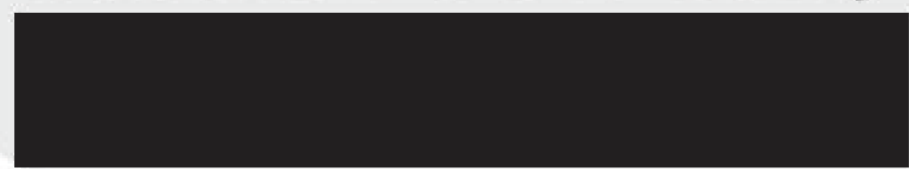
12:21 AM

POC is Mitzi Martin Supervisor of Elections



1:20 AM

Second POC is Cathy Latham



1:25 AM



**Paul Maggio**

We are planning on driving down. Leaving Atlanta around 8 AM

5:04 AM



New Message







# Coffee\_County\_Forensics



down. Leaving Atlanta around 8 AM

Jan 7, 2021

5:04 AM

Scott, let me know when you are up. I will call you.

5:44 AM

The S2 team is about 30 minutes from Douglas Ga. @Scott Hall let us know when you land and where to meet.

11:03 AM

PM



Scott Hall  
Just landed

11:08 AM

Paul Maggio  
20 minutes out

Our vehicle is full. Cathy sent someone to pick you up.

11:12 AM

Collection is going well. No real issues at this point. Looking to be here until 6-7 PM this



New Message





# Coffee\_County\_Forensics



Jan 7, 2021

Collection is going well. No real issues at this point. Looking to be here until 6-7 PM this evening.

PM

2:56 PM

**Charles Bundren**

Thanks

C

3:08 PM

**Paul Maggio**

We just finished up at Coffee County and are on our way back to Atlanta. Everything went well with no issues.

PM

7:47 PM

**Charles Bundren**

Thanks

C

7:51 PM

Scott Hall



8:05 PM



New Message

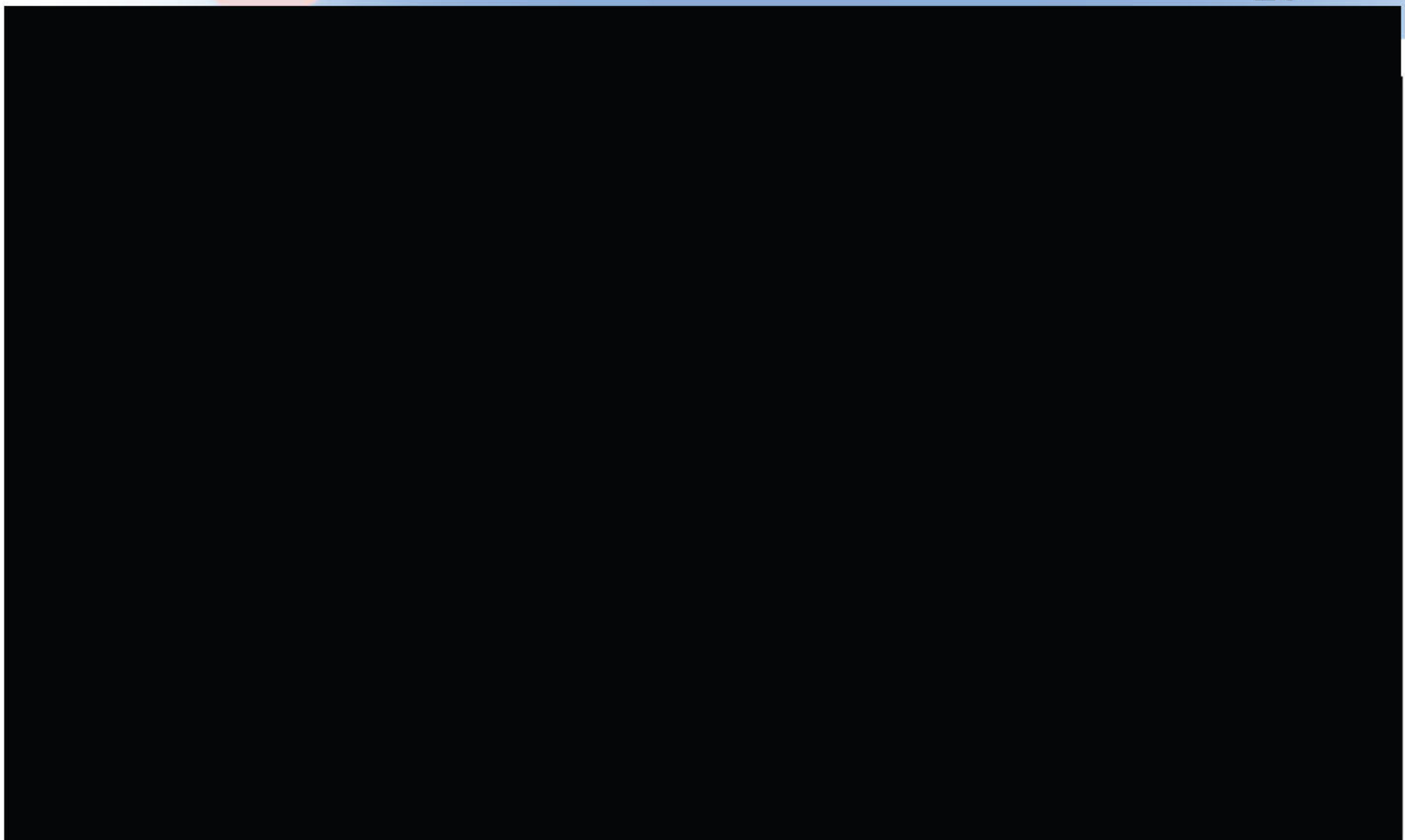




11:20 AM



Jim Nelson @



Jan 7, 2021

Missed call · Jan 7, 2021 2:27 PM

Call Back

Do you still need to talk?

Been busy 3:09 PM

No I'm good. 3:10 PM

Great 3:10 PM



New Message



11212011-000023



3:29 PM



PM

Paul Maggio @

✓ Verified



24

Jan 6, 2021

do you want to talk about Coffee County?

FYI: I was just packing up the big Pelican to take to Knoxville!

7:37 PM



Jan 9, 2021

We are not uploading/giving access to anyone until we are paid. 5:24 AM

I am communicating with Jim P one on one on Signal about getting paid before we release any data 1:01 PM

Thanks for keeping me in the loop

2:49 PM



Greg, let's keep communications quiet for now. I am now negotiating directly with Sidney 5:44 PM



New Message



11212011-000024



3:29 PM



PM

Paul Maggio @

✓ Verified



25



Sep 28, 2021

Was the contract with Sidney personally, or Defending the Republic?

7:07 PM

Sep 29, 2021

Defending the Republic 6:02 AM



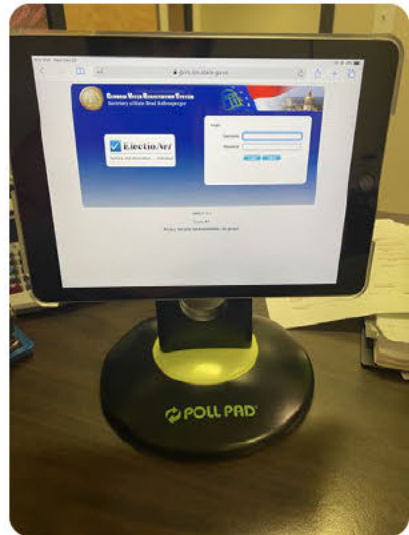
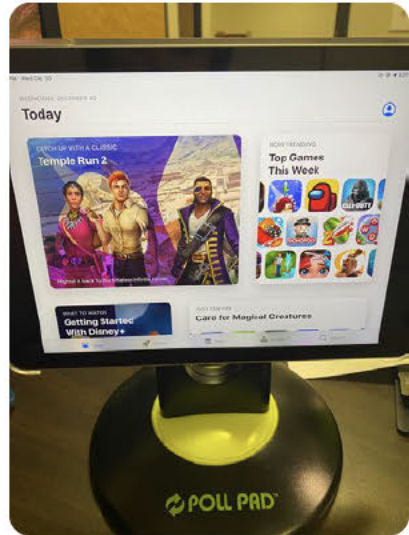
New Message



11212011-000025

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12/30/20, 4:00 PM



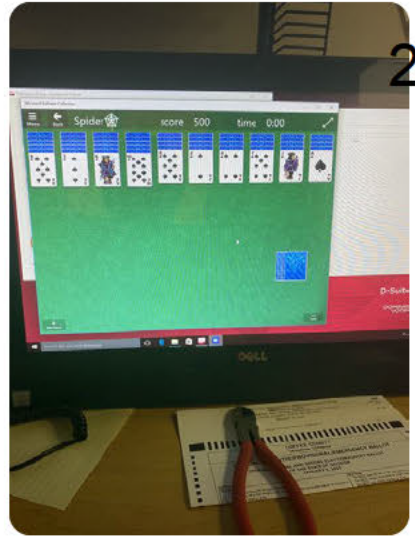
This is the poll pad that we use on Election Day, you can watch Netflix



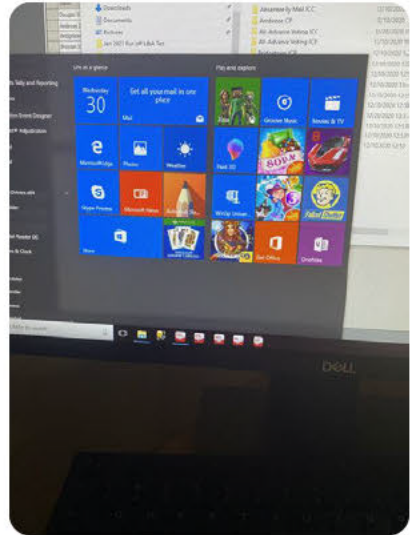
What channel

**BREAKING VIDEO: DOMINION HACK! Voting Systems in Fulton County, GA Have been HACKED on LIVE TV! | Red Voice Media**  
<https://www.redvoicemedia.com/2020/12/30/breaking-video-dominion-hack-voting-systems-in-fulton-county-ga-have-been-hacked-on-live-tv/>

Wow!!!!



This is the computer that the ICC scanner is connected to



This is the EMS server computer

12/31/20, 11:13 AM

You busy

12/31/20, 2:51 PM

Can you come down here

12/31/20, 7:46 PM

Did you get the letter sent

No. I am going to finish it tomorrow

prestonhaliburton [redacted]

12/31/20, 9:13 PM

I resent it

Thanks!!

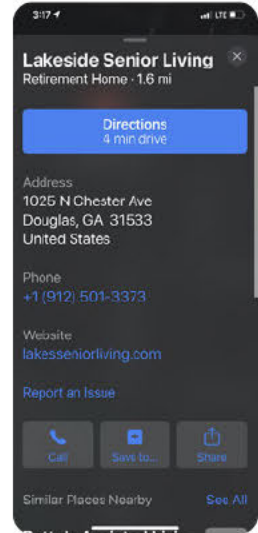
1/4/21, 11:02 AM

Hey, sorry to bother you when you are busy, I am about to have a very disgruntled voter coming to the office. The voter called to see where her sons ballot was, I asked to speak to her son, and she said, he is a truck driver and he is in another sta..... and then you could hear Olivia in the background telling her what to say, she asking for proof that I mailed it, lol she said she wanted to count my stamps.... lol just to let you know



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1/5/21, 3:17 PM



Contact person?

She said if you go to the door ring the door bell they will come out to you. I called them and they know what to do. You just wait on it outside.

1/5/21, 5:15 PM

I called the law again about the dance party!

Hey Ms. Ernestine don't like Surcheros.

Can we order something else

Sure

Do whatever works

Im not picky

1/6/21, 4:26 PM

Scott Hall is on the phone with Cathy about wanting to come scan our ballots from the general election like we talked about the other day. I am going to call you in a few

1/6/21, 8:54 PM

I found out tonight, that there is another way to change ballots in RTR!

What?

Yelp!

How

I found a Manuel on Diminion

Wow

1/7/21, 10:18 AM

Hey, are you coming to the office. I need a board member to be here when we transfer ballots

I'll be there@11



1/7/21, 7:24 PM

+1 [redacted]

Let's switch to Signal <https://signal.org/install>

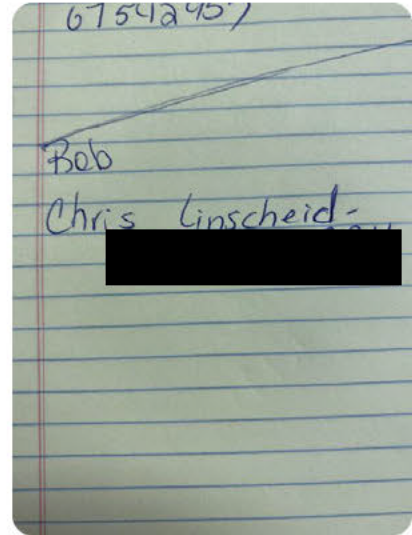
1/8/21, 11:52 AM

Did you check signal?

Call you in just a minute

Tag

1/12/21, 2:56 PM



1/15/21, 5:08 PM

Do you have snap chat? Signal is down!

1/19/21, 10:35 AM

If you happen to be in town, the guys measuring my desk are still here

1/20/21, 6:47 PM

Do you have a high capacity scanner in your office?

1/22/21, 1:53 PM

Are you at your office

1/25/21, 7:31 PM

You busy

1/27/21, 9:23 AM

I took care of the people measuring my desk

2/5/21, 5:51 PM

I am looking for a dependable car with a low payment

2/9/21, 2:30 PM

Do you still have the 2007 Nissan Armada

2/9/21, 5:20 PM

[https://www.bitchute.com/video/17ZUoNxKWACb/?fbclid=IwAR0kUYA\\_2y9kKYlQkqTkn-8Ah7kow1C3RGrkitWbC3GCWRmLkGksNX6RrXo](https://www.bitchute.com/video/17ZUoNxKWACb/?fbclid=IwAR0kUYA_2y9kKYlQkqTkn-8Ah7kow1C3RGrkitWbC3GCWRmLkGksNX6RrXo)

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---

**From:** Paul Maggio (SullivanStrickler LLC)  
**Sent:** Thursday, January 7, 2021 10:31 AM  
**To:** Sidney Powell <[sidney@federalappeals.com](mailto:sidney@federalappeals.com)>  
**Cc:** Tricia <[tricia@federalappeals.com](mailto:tricia@federalappeals.com)>; Jim Penrose <[jim@fightback.law](mailto:jim@fightback.law)>; Brendan Sullivan (SullivanStrickler LLC) <[bsullivan@sullivanstrickler.com](mailto:bsullivan@sullivanstrickler.com)>; Doug Logan <[Doug@fightback.law](mailto:Doug@fightback.law)>  
**Subject:** RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement

Sidney,

Good morning.

Per Jim Penrose's request, we are on our way to Coffee County Georgia to collect what we can from the Election / Voting machines and systems.

As per our existing agreement, I am attaching the invoice for our initial retainer. Please let me know if there are any questions or concerns.

If Tricia can send payment / Fed Ex label information as before, it would be much appreciated.

Thank you

Paul Maggio  
COO  
(404) 234-3962  
SullivanStrickler, LLC  
[pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com)  
[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

---

**From:** Sidney Powell <[sidney@federalappeals.com](mailto:sidney@federalappeals.com)>  
**Sent:** Monday, December 21, 2020 6:30 PM  
**To:** Paul Maggio (SullivanStrickler LLC) <[pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com)>  
**Cc:** Tricia <[tricia@federalappeals.com](mailto:tricia@federalappeals.com)>; Jim Penrose <[jim@fightback.law](mailto:jim@fightback.law)>; Brendan Sullivan (SullivanStrickler LLC) <[bsullivan@sullivanstrickler.com](mailto:bsullivan@sullivanstrickler.com)>; Doug Logan <[Doug@fightback.law](mailto:Doug@fightback.law)>  
**Subject:** Re: SSA1722: Jim Penrose - Wayne County MI Forensics Engagement Agreement

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Thank you ALL!! Sidney

**Sidney Powell**

Texas Attorney & Author of *Licensed to Lie: Exposing Corruption in the Department of Justice*, available on [Amazon](https://www.amazon.com) or at [www.LicensedtoLie.com](http://www.LicensedtoLie.com) + Senior Policy Advisor @AmericaFirstPol and Senior Fellow at the London Center for Policy Research  
[www.FederalAppeals.com](http://www.FederalAppeals.com)

On Mon, Dec 21, 2020 at 6:26 PM Paul Maggio (SullivanStrickler LLC) <[pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com)> wrote:

08122022-000035

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**SullivanStrickler, LLC**  
 2660 Peachtree Road NW #13A  
 Atlanta, GA 30305  
 +1 6789151662  
 ar@sullivanstrickler.com  
 http://www.sullivanstrickler.com

**SullivanStrickler**

## INVOICE

**BILL TO**

Sidney Powell  
 Defending the Republic

**INVOICE #** 4205

**DATE** 01/07/2021

**DUE DATE** 01/07/2021

**TERMS** Due on receipt

**PROJECT #**

SSA1722

**CLIENT/MATTER**

Voting Machines Analysis

DATE	ACTIVITY	QTY	RATE	AMOUNT
01/07/2021	<b>Forensics:Forensic Expert Daily Rate</b> 01/07/2021 On Site Coffee County Georgia; 4 people x 1 day	4	6,500.00	26,000.00
01/07/2021	Retainer; Payable before work commences <b>Forensics:Travel</b> Mileage   394 miles round trip Atlanta GA to Douglas GA	394	0.56	220.64

BALANCE DUE

**USD 26,220.64**

Bank Details

To pay by EFT, please remit payment to:  
 Bank Name: Synovus Bank  
 Account Name: SullivanStrickler, LLC  
 ABA: 061100606  
 Acct Number: 1015270422

To pay via check, please remit payment to:  
 SullivanStrickler, LLC  
 2660 Peachtree Road, NW #13A  
 Atlanta, GA 30305

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# **Engagement Agreement Forensic Analysis**

**Presented to:**

**Sidney Powell  
Defending the Republic**

**Presented by:**

**Paul Maggio  
SullivanStrickler LLC**

**Presented on:**

**6 December 2020**

Sidney Powell  
sidney@federalappeals.com

Dear Ms. Powell,

SullivanStrickler LLC ("SS") is pleased to present your firm ("Customer") this Engagement Agreement ("EA") detailing data services ("Services") to be performed on your behalf by SS. Upon full execution of this EA, SS will provide Customer with the services detailed below.

The following sections are included in this EA:

Exhibit 1 – Overview (Project Requirements, Assumption)

Should you have any questions or wish to discuss this document, I can be contacted at (404) 234-3962 or by e-mail at [pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com).

Sincerely,

Paul Maggio  
COO  
SullivanStrickler, LLC

I hereby agree to the terms of this EA,

Customer

**/s/Sidney Powell**

By (Signature)

**Sidney Powell**

Name (Printed)

**Lead Counsel**

Title

**12/6/2020**

Date

**Note:** Please scan and email, the executed full copy of this document to [pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com). SS will return a mutually executed original copy upon receipt.

## **Exhibit 1** **Overview**

### **Requirements**

The following were defined during phone call, face to face meetings, and/or e-mail interactions between Customer and SS representatives as requirements ("Requirements") to be satisfied through the performance of Services by SS:

Customer is requesting that SS provide services such as Computer Forensic Collections and Analytics on the Dominion Voting Systems equipment; from the Poll Pads (iPads) to the Windows machines that run the scanners, to Linux machines that tabulate the votes in The State of Michigan.

## Processing

Reconfiguration of Source Media will occur in the manner determined by both Customer and SS. In situations where Customer has no requirement as to the production order, SS will restore data in the manner deemed most appropriate by SS as satisfying the Requirements contained herein. If Customer requires a specific production sequence to meet time commitments to other Customer or external processes, please inform SS prior to the commencement of Services so as to minimize the impact to the production processes.

- 1) Upon receipt of the media, SS will inventory and physically check the condition of all media, as well as fill out all required CoC documentation, if any. Any damaged or missing items will be reported to Customer;
- 2) Services will be performed as quickly as technically possible, taking into consideration technical limitations beyond SS and Customer's control;
- 3) Services to be performed in satisfaction of the Requirements contained herein do not include decrypting encrypted data or any other service not specifically detailed herein. SS offers such services as optional services to be priced via custom quote when detailed knowledge of the additional requirements are known;

SS's agreement to perform the Services is not a guarantee of Customer's desired results, but rather an agreement to simply perform the activities detailed herein. SS is not liable for damages, actual or consequential, resulting from its agreement to perform said Services.

## Shipping Instructions

Please ship any media not picked up to the address below. Tape and disk storage media should not be shipped via "ground" service due to the potential for damage to the media caused by magnets and other potential items which can only be shipped via "ground" service. Additionally, please do not use packing "peanuts" in your shipping container. Pieces can break off and find their way into tape cartridges, causing damage.

SullivanStrickler LLC  
ATTN: Media Management  
4532 Old Jonesboro Road  
Forest Park, GA 30297  
(678) 626-1659

## Pricing

### State of Michigan work

Flat rates

\$6500/expert/day. 4 experts - \$26,000.  
Travel & Lodging provided by customer  
Retainer of \$26,000 paid before work commences

### State of Arizona work

Flat rates

\$6500/expert/day. 4 experts - \$26,000.  
Travel & Lodging provided by customer  
Retainer of \$26,000 paid before work commences

## Exhibit 2

### Terms of Service

Sidney Powell  
Defending the Republic  
sidney@federalappeals.com

**These Terms of Service form part of a contract between SullivanStrickler, LLC (the “Company”) and the individual, corporation, partnership, limited liability company or other business (the “Customer”) who submits an order (the “Order”) for services or products (collectively, the “Services”) through the Company’s website at [www.sullivanstrickler.com](http://www.sullivanstrickler.com) (the “Company Site”) or via telephone or written order form in each case referencing the Service Description (defined below). The entire contract consists of these Terms of Service, any billing information provided by the Customer and the description of the Services (the “Service Description”) provided by the Company on its website or in another format.**

**The Company Site and the Service Description set forth the features, functions and Services elements that are included within the Services.**

#### 1. Order, Acceptance and Services.

(a) When Accepted by Company, the Order submitted by Customer creates a contract between Customer and Company, consisting of the Order, the Service Description and these Terms of Service. An Order is “Accepted” by Company when Company provides the Customer with a user name and password through which to access the Services, provides the Company with a written Order acceptance or provisions the Services to the Customer (whether electronically or by physical delivery).

(b) Company will provide, and Customer will purchase and pay for, the Services specified in the Order (the “Service Fees”). Service Fees will vary and will be specified in the Customer’s Order or in the Service Description.

2. Fees, Taxes and Payment. Customer will pay to Company the Service Fees in the amount and in the manner set forth above as retainers and supported in an electronic invoice provided by Company to Customer

#### 3. Term and Termination.

(a) Services will commence when provisioned and continue until terminated by either party (such period being the “Term”).

(b) Either party may terminate this Agreement immediately upon the occurrence of any one or more of the following events: (i) the other party fails to pay when due any amounts required to be paid under this Agreement; (ii) the other party breaches any material term or provision of this Agreement (other than a breach described in subsection (i) above), and if capable of cure, such breach remains uncured 10 days after the non-breaching party gives written notice thereof to the breaching party; or (iii) the other party becomes insolvent, makes an assignment for the benefit of its creditors, institutes or becomes subject to any proceeding under any bankruptcy or similar laws for the relief of debtors, or seeks the appointment of, or becomes subject to the appoint of, any trustee or receiver for all or any portion of such party’s assets.

(c) Upon termination of this Agreement for any cause or reason whatsoever, neither party shall have any further rights or obligations under this Agreement, except for Customer’s obligation to pay for Orders previously Accepted

and the provisions of Sections 2 through 14 of this Agreement shall survive the expiration or termination of this Agreement for any cause or reason whatsoever, and, notwithstanding the expiration or termination of this Agreement, the parties shall each remain liable to the other for any indebtedness or other liability theretofore arising under this Agreement. Termination of this Agreement and retention of pre-paid fees and charges shall be in addition to, and not be in lieu of, any other legal or equitable rights or remedies to which Company may be entitled.

#### 4. Customer's Representations and Warranties.

Customer hereby represents and warrants to Company, and agrees that during the Term Customer will ensure that: (a) Customer is the owner or valid licensee of all of the information, documents, graphic items and other data (of every kind and description) that Customer may process through its receipt of the Services or use in the Services (as applicable, the "Customer Content"), and Customer has secured all necessary licenses, consents, permissions, waivers and releases for the use of the Customer Content and each element thereof, including without limitation, all trademarks, logos, names and likenesses contained therein, without any obligation by Company to pay any fees, residuals, guild payments or other compensation of any kind to any individual, partnership, joint venture, corporation, limited liability company, trust, unincorporated association or organization, or government or any agency or political subdivision thereof (as applicable, a "Person"); (b) Customer's use, publication and display of the Customer Content will not infringe any copyright, patent, trademark, trade secret or other proprietary or intellectual property right of any Person, or constitute a defamation, invasion of privacy or violation of any right of publicity or any other right of any Person, including, without limitation, any contractual, statutory or common law right or any "moral right" or similar right however denominated; (c) Customer will comply with all applicable laws, rules and regulations regarding the Customer Content and any Web-based display portal the Company may provision for the Customer's use (as applicable, the "Customer Page") and will use the Customer Page only for lawful purposes; (d) Customer has used its best efforts to ensure that the Customer Content is and will at all times remain free of all computer viruses, worms, trojan horses and other malicious code; and (e) Customer will use the Services only for the Customer's own purposes and not for resale or distribution.

#### 5. License to Company.

Customer hereby grants to Company a non-exclusive, royalty-free, worldwide right and license during the Term to do the following to the extent necessary in the performance of the Services under the Order: (a) digitize, convert, install, upload, select, arrange, compile, combine, synchronize, use, reproduce, store, process, retrieve, transmit, distribute, publish, publicly display, publicly perform and hyperlink the Customer Content; and (b) make archival or back-up copies of the Customer Content and the Customer Page. Except for the rights expressly granted above, Company is not acquiring any right, title or interest in or to the Customer Content, all of which shall remain solely with Customer.

#### 6. Company's Acceptable Use Policy.

Customer will abide by, and utilize the Services and the Customer Page only in accordance with this Agreement and any applicable law.

#### 7. Customer's Responsibilities.

(a) Customer is solely responsible for the quality, performance and all other aspects of the Customer Content and any statements made within the Customer Page.

(b) Customer will cooperate fully with Company in connection with Company's performance of the Services.

#### 8. Company Intellectual Property.

(a) Except for the Customer's limited right to utilize the Services, this Agreement does not transfer from Company to Customer any of the Company's proprietary technology, including, without limitation, Company services, software tools, hardware designs, algorithms, software (in source code and object code forms), user interface designs, architecture, class libraries, objects and documentation (both printed and electronic), network designs, know-how, trade secrets and any related intellectual property rights throughout the world (whether owned by Company or licensed to Company from a third party), and also including any derivatives, improvements, enhancements, updates, modifications or extensions of Company Technology conceived, reduced to practice or developed at any time (as applicable, the "Company Technology").

(b) Company Technology, and all rights, titles and interests in and to the Company Technology shall remain solely with Company. Customer shall not, directly or indirectly, reverse engineer, decompile, disassemble or otherwise attempt to derive source code or other trade secrets from any of the Company Technology.

(c) Company's trademarks, trade names, service marks, logos, other names and marks, and related product and service names, design marks and slogans are the sole and exclusive property of Company. Customer may not use any of the foregoing in any advertising, publicity or in any other commercial manner without the prior written consent of Company. Company shall maintain and control ownership of all Internet protocol numbers and addresses that may be assigned by Company to Customer. Company may, in its sole discretion, change or remove any and all such Internet protocol numbers and addresses.

(d) To the extent the Services include the sale of licensed software by Company to Customer, the sales of such licensed software are subject to any additional license terms as may be provided in the product packaging or in any applicable click-through or similar software license agreement, as well as the provisions of this Section 7 relating to Company Technology.

#### 9. Resale Products.

Any Services that include products manufactured or developed by a third party for resale by Company may be subject to additional terms and conditions as required by the original manufacturer or developer, as set forth in the Service Description.

#### 10. Limited Warranty.

(a) Company represents and warrants to Customer that the Services will be performed (i) in a manner consistent with industry standards reasonably applicable to the performance thereof and (ii) at least at the same level of service as provided by Company generally to its other Customers for the same services. Customer will be deemed to have accepted such Services unless Customer notifies Company within seven (7) business days after performance of any Services of any breach of the foregoing warranties. Customer's sole and exclusive remedy, and Company's sole obligation, for breach of the foregoing warranties shall be for Company, at its option, to re-perform the defective Services at no cost to Customer, or, in the event of interruptions to the Services caused by a breach of the foregoing warranties, issue Customer a credit in an amount equal to the current monthly Service Fees pro-rated by the number of hours in which the Services have been interrupted.

(b) The foregoing warranties shall not apply to performance issues or defects in the Services (i) caused by factors outside of Company's reasonable control; (ii) that resulted from any actions or inactions of Customer or any third parties; or (iii) that resulted from Customer's equipment or any third-party equipment not within the sole control of Company.

(c) EXCEPT AS EXPRESSLY PROVIDED IN THIS SECTION, COMPANY MAKES NO REPRESENTATIONS OR WARRANTIES OF ANY KIND, EXPRESS OR IMPLIED, WITH RESPECT TO THE SERVICES OR ANY SOFTWARE PROVIDED UNDER THIS AGREEMENT, INCLUDING, WITHOUT LIMITATION, ANY WARRANTY OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, TITLE OR NON-INFRINGEMENT OF



THIRD-PARTY RIGHTS, AND COMPANY HEREBY EXPRESSLY DISCLAIMS THE SAME. WITHOUT LIMITING THE FOREGOING, ANY THIRD-PARTY SOFTWARE PROVIDED TO CUSTOMER HEREUNDER IS PROVIDED "AS IS" WITHOUT ANY CONDITION OR WARRANTY WHATSOEVER. COMPANY DOES NOT WARRANT THAT THE SERVICES WILL BE UNINTERRUPTED, ERROR-FREE OR COMPLETELY SECURE.

#### 11. Limitation of Liability.

(a) IN NO EVENT WILL COMPANY'S LIABILITY IN CONNECTION WITH THE SERVICES, ANY SOFTWARE PROVIDED HEREUNDER OR ANY ORDER, WHETHER CAUSED BY FAILURE TO DELIVER, NON-PERFORMANCE, DEFECTS, BREACH OF WARRANTY OR OTHERWISE, EXCEED THE AGGREGATE SERVICE FEES PAID TO COMPANY BY CUSTOMER DURING THE 6-MONTH PERIOD IMMEDIATELY PRECEDING THE EVENT GIVING RISE TO SUCH LIABILITY.

(b) COMPANY CANNOT GUARANTEE CONTINUOUS SERVICE, SERVICE AT ANY PARTICULAR TIME, INTEGRITY OF DATA, INFORMATION OR CONTENT STORED OR TRANSMITTED VIA THE INTERNET. COMPANY WILL NOT BE LIABLE FOR ANY UNAUTHORIZED ACCESS TO, OR ANY CORRUPTION, ERASURE, THEFT, DESTRUCTION, ALTERATION OR INADVERTENT DISCLOSURE OF, DATA, INFORMATION OR CONTENT TRANSMITTED, RECEIVED OR STORED ON ITS SYSTEM.

(c) EXCEPT AS EXPRESSLY PROVIDED BELOW, NEITHER PARTY SHALL BE LIABLE IN ANY WAY TO THE OTHER PARTY OR ANY OTHER PERSON FOR ANY LOST PROFITS OR REVENUES, LOSS OF USE, LOSS OF DATA OR COSTS OF PROCUREMENT OF SUBSTITUTE GOODS, LICENSES OR SERVICES OR SIMILAR ECONOMIC LOSS, OR FOR ANY PUNITIVE, INDIRECT, SPECIAL, INCIDENTAL, CONSEQUENTIAL OR SIMILAR DAMAGES OF ANY NATURE, WHETHER FORESEEABLE OR NOT, UNDER ANY WARRANTY OR OTHER RIGHT HEREUNDER, ARISING OUT OF OR IN CONNECTION WITH THE PERFORMANCE OR NON-PERFORMANCE OF ANY ORDER, OR (EXCEPT AS PROVIDED IN SECTIONS 11 AND 12) FOR ANY CLAIM AGAINST THE OTHER PARTY BY A THIRD PARTY, REGARDLESS OF WHETHER IT HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH CLAIM OR DAMAGES.

(d) The limitations contained in this Section apply to all causes of action in the aggregate, whether based in contract, tort or any other legal theory (including strict liability), other than claims based on fraud or willful misconduct. The limitations contained in Section 10(c) shall not apply to liability arising on account of Customer's indemnification obligations under Section 11.

#### 12. Indemnification of Company.

Customer shall defend, indemnify and hold harmless Company, its affiliates and their respective present, former and future officers, directors, employees and agents, and their respective heirs, legal representatives, successors and assigns (collectively the "Company Indemnitees"), from and against any and all losses, damages, costs, liabilities and expenses (including, without limitation, amounts paid in settlement and reasonable attorneys' fees) which any of the Company Indemnitees may suffer, incur or sustain resulting from or arising out of (i) Customer's breach of any representation, warranty, or covenant contained in the Agreement, (ii) the Customer Content, the Customer Page or any end user's use of the Customer Content or the Customer Page, (iii) violation by Customer or any of its officers, directors, employees or agents of any applicable law, (iv) claims or actions of third parties alleging misappropriation of trade secrets or infringement of patents, copyrights, trademarks or other intellectual property rights arising from the use, display or publication of Customer's domain names, the Customer Page, the Customer Content, or the use of the Services in combination with hardware, software or content not provided by Company, (v) claims or actions by third parties relating to or arising out of Customer's use of the Services, and (vi) any damage to Company's servers or other hardware caused by Customer.

#### 13. Indemnification of Customer.

(a) Subject to Section 11, Company shall, at its own expense, indemnify, defend and hold Customer harmless from any claim or suit alleging that the Services infringe any United States patent, copyright or trademark existing on the Effective Date, or that Company has knowingly misappropriated any trade secret or other intellectual property right of any other Person, including any losses, damages or expenses arising from any such claim or suit. Customer agrees to cooperate with and assist Company in the defense or settlement of any such claim or suit. Customer shall be reimbursed for all reasonable out-of-pocket expenses incurred in providing any cooperation or assistance requested by Company, but Company will not be liable for any costs or expenses incurred without its prior written authorization.

(b) Promptly after receipt by Customer of a threat of any claim or suit, or a notice of the commencement or filing of any claim or suit, against which Customer may be indemnified hereunder, Customer shall give written notice thereof to Company, provided that failure to give or delay in giving such notice to Company shall not relieve Company of any liability it may have to Customer hereunder, except to the extent that the defense of such claim or suit is prejudiced thereby. Company shall have sole control of the defense, and of all negotiations for settlement, of such claim or suit. Subject to the foregoing, Customer may participate in the defense of any such claim or suit at Customer's own expense.

(c) If an injunction, decree or judgment is, or Company believes in its sole discretion is likely to be, entered providing that Customer may not use the Services as contemplated in this Agreement without violating the intellectual property rights of a third party, Company may, at its sole option and expense, either (i) procure for Customer the right to use the Services or affected part thereof as provided in this Agreement; (ii) replace the Services or affected part thereof with other non-infringing services or modify the Services or affected part thereof so as to be non-infringing; or (iii) terminate this Agreement upon written notice to Customer.

(d) Notwithstanding Section 12(a), Company assumes no liability for infringement claims arising from (i) use of the Services with third-party products or services where the third-party products or services cause the infringement, (ii) any modification of the Services not authorized by Company in writing, (iii) the Customer Content, the Customer Page or any content, data or information provided or supplied by an End User, or (iv) Customer's use of any third-party software provided hereunder. THE FOREGOING DEFENSE AND INDEMNIFICATION PROVISIONS STATE THE ENTIRE LIABILITY AND OBLIGATION OF COMPANY, AND THE EXCLUSIVE REMEDY OF CUSTOMER, WITH RESPECT TO ANY ACTUAL OR ALLEGED INFRINGEMENT OF ANY INTELLECTUAL PROPERTY RIGHT BY THE SERVICES PROVIDED HEREUNDER.

#### 14. Privacy Policy.

(a) Company will keep confidential Customer's name, address, telephone number, email address, credit card information, password and other non-public information provided by Customer to Company for the purpose of obtaining or maintaining the Customer's account or paying amounts owed to Company (collectively, the "Customer Confidential Information").

(b) Company may use the Customer Confidential Information to administer the Customer's account, collect fees owed by Customer and as reasonably necessary or convenient to facilitate the Services. Company may not provide the Customer Confidential Information to any third party, except for attorneys, accountants, employees and agents working on behalf of Company pursuant to this Agreement.

(c) Company may collect information regarding the Customer from sources other than the Customer Confidential Information (including data concerning Customer's usage of the Services and the Company Site) ("Customer Non-Confidential Information"). Company may use the Customer Non-Confidential Information for any purpose and may share Customer Non-Confidential Information with any party so long as the Customer Non-Confidential Information cannot be correlated with, or linked to, Customer Confidential Information. The Company Site may

use software cookies or web beacons to track Customer usage of the Company Site or the Services. Information collected by Company through such means is Customer Non-Confidential Information.

(d) Notwithstanding Section 13(a), the following shall not be considered Customer Confidential Information: (i) any information that Company can demonstrate by written documentation was within its legitimate possession prior to the time of disclosure by Customer; (ii) any information that was in the public domain prior to disclosure by Customer to Company as evidenced by documents that were published prior to such disclosure; (iii) any information that, after disclosure by the Customer to Company, comes into the public domain through no fault of Company, or (iv) any information that is disclosed to Company without restriction by a third party who has legitimate possession thereof and the legal right to make such disclosure.

(e) The data will be maintained in compliance with HIPAA, the Health Insurance Portability and Accountability Act, which sets the standard for protecting sensitive patient data. Company will ensure that any dealing with protected health information (PHI) will follow all the required physical, network, and process security measures.

#### 15. Miscellaneous.

(a) Independent Contractor. Company and Customer are independent contractors and nothing contained in this Agreement places Company and Customer in the relationship of principal and agent, master and servant, partners or joint ventures. Neither party has, expressly or by implication, or may represent itself as having, any authority to make contracts or enter into any agreements in the name of the other party, or to obligate or bind the other party in any manner whatsoever.

(b) Governing Law; Jurisdiction. Any controversy or claim arising out of or relating to this Agreement, the formation of this Agreement or the breach of this Agreement, including any claim based upon arising from an alleged tort, shall be governed by the substantive laws of the State of Georgia, except that all arbitration and related proceedings conducted pursuant to Section 14(c) below, including without limitation confirmation proceedings, shall be governed by the Federal Arbitration Act, 9 U.S.C. §§ 1, et. seq. The United Nations Convention on Contracts for the International Sale of Goods does not apply to this Agreement. ANY SUIT, ACTION OR PROCEEDING CONCERNING THIS AGREEMENT THAT IS NOT SUBJECT TO MANDATORY ARBITRATION PURSUANT TO SECTION 14(C) BELOW MUST BE BROUGHT IN A GEORGIA STATE OR FEDERAL COURT LOCATED IN FULTON COUNTY, GEORGIA, AND EACH OF THE PARTIES HEREBY IRREVOCABLY CONSENTS TO THE EXCLUSIVE JURISDICTION OF SUCH COURTS (AND OF THE APPROPRIATE APPELLATE COURTS THEREFROM) IN ANY SUCH SUIT, ACTION OR PROCEEDING AND IRREVOCABLY WAIVES, TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, ANY OBJECTION WHICH IT MAY NOW OR HEREAFTER HAVE TO THE LAYING OF THE VENUE OF ANY SUCH SUIT, ACTION OR PROCEEDING IN ANY SUCH COURT OR THAT ANY SUCH SUIT, ACTION OR PROCEEDING WHICH IS BROUGHT IN ANY SUCH COURT HAS BEEN BROUGHT IN AN INCONVENIENT FORUM.

(c) Mandatory Arbitration. Notwithstanding Section 14(b) above, each party agrees that any dispute between the parties arising out of this Agreement or in any manner relating to the Services must be submitted by the parties to arbitration in accordance with the Commercial Arbitration Rules of the American Arbitration Association, as administered by the American Arbitration Association in Atlanta, Georgia (or such other recognized provider of arbitration services agreed upon by both parties) before a single arbitrator, appointed in accordance with such rules. Any such dispute shall address only the claims brought by the applicable party and no party may represent a class of similarly situated persons. Any such arbitrator must render a reasoned opinion in writing only where the amount in dispute exceeds \$100,000. Judgment upon the award may be entered in any court having jurisdiction thereof. Any such arbitration will be held in Atlanta, Georgia. Any action filed by either party in any court in violation of this Section should be dismissed pursuant to this Section.

(d) Headings. The headings herein are for convenience only and are not part of this Agreement.

(e) Entire Agreement; Amendments. This Agreement, including documents incorporated herein by reference, supersedes all prior discussions, negotiations and agreements between the parties with respect to the subject matter hereof, and this Agreement constitutes the sole and entire agreement between the parties with respect to the matters covered hereby. In case of a conflict between this Agreement and any Order, confirmation, correspondence or other communication of Customer or Company, the terms and conditions of this Agreement shall control. This Agreement may not be modified or amended except by another agreement in writing executed by the parties hereto; provided, however, that these Terms of Service may be modified from time to time by Company in its sole discretion, which modifications will be effective upon posting to Company Site.

(f) Severability. All rights and restrictions contained in this Agreement may be exercised and shall be applicable and binding only to the extent that they do not violate any applicable laws and are intended to be limited to the extent necessary so that they will not render this Agreement illegal, invalid or unenforceable. If any provision or portion of any provision of this Agreement shall be held to be illegal, invalid or unenforceable by a court of competent jurisdiction, it is the intention of the parties that the remaining provisions or portions thereof shall constitute their agreement with respect to the subject matter hereof, and all such remaining provisions or portions thereof shall remain in full force and effect.

(g) Notices. All notices and demands required or contemplated hereunder by one party to the other shall be in writing and shall be deemed to have been duly made and given upon date of delivery if delivered in person or by an overnight delivery or postal service, upon receipt if delivered by facsimile the receipt of which is confirmed by the recipient, or upon the expiration of five days after the date of posting if mailed by certified mail, postage prepaid, to the addresses or facsimile numbers set forth below the parties' signatures. Either party may change its address or facsimile number for purposes of this Agreement by notice in writing to the other party as provided herein. Company may give written notice to Customer via e-mail to the Customer's e-mail address as maintained in Company's billing records.

(h) Waiver. No failure or delay by any party hereto to exercise any right or remedy hereunder shall operate as a waiver thereof, nor shall any single or partial exercise of any right or remedy by any party preclude any other or further exercise thereof or the exercise of any other right or remedy. No express waiver or assent by any party hereto to any breach of or default in any term or condition of this Agreement shall constitute a waiver of or an assent to any succeeding breach of or default in the same or any other term or condition hereof.

(i) Assignment; Successors. Customer may not assign or transfer this Agreement or any of its rights or obligations hereunder, without the prior written consent of Company. Any attempted assignment in violation of the foregoing provision shall be null and void and of no force or effect whatsoever. Company may assign its rights and obligations under this Agreement, and may engage subcontractors or agents in performing its duties and exercising its rights hereunder, without the consent of Customer. This Agreement shall be binding upon and shall inure to the benefit of the parties hereto and their respective successors and permitted assigns.

(j) Limitation of Actions. No action, regardless of form, arising by reason of or in connection with this Agreement may be brought by either party more than one year after the cause of action has arisen.

(k) Counterparts. If this Agreement is signed manually, it may be executed in any number of counterparts, each of which shall be deemed an original and all of which together shall constitute one and the same instrument. If this Agreement is signed electronically, Company's records of such execution shall be presumed accurate unless proven otherwise.

(l) Force Majeure. Neither party is liable for any default or delay in the performance of any of its obligations under this Agreement (other than failure to make payments when due) if such default or delay is caused, directly or indirectly, by forces beyond such party's reasonable control, including, without limitation, fire, flood, acts of God, labor disputes, accidents, acts of war or terrorism, interruptions of transportation or communications, supply

shortages or the failure of any third party to perform any commitment relative to the production or delivery of any equipment or material required for such party to perform its obligations hereunder.

(m) No Third-Party Beneficiaries. Except as otherwise expressly provided in this Agreement, nothing in this Agreement is intended, nor shall anything herein be construed to confer any rights, legal or equitable, in any Person other than the parties hereto and their respective successors and permitted assigns.

(n) Government Regulations. Customer may not export, re-export, transfer or make available, whether directly or indirectly, any regulated item or information to anyone outside the United States in connection with this Agreement without first complying with all export control laws and regulations which may be imposed by the United States government and any country or organization of nations within whose jurisdiction Customer operates or does business.

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< **C** Cathy Latham ▾



Thursday, January 7, 2021

[440 Elton D Brooks Blvd,  
Douglas, GA 31535](#)

11:09 AM

11:10 AM

Received. We will pick up Scott

11:11 AM

Better yet, have Eddie pick up Scott. Our vehicle is full. We will meet him there.

How far out are you?

11:30 AM

11:33 AM

We are in town waiting for Scott to let us know when to pull in.



< S Scott Hall



Thursday, January 7, 2021



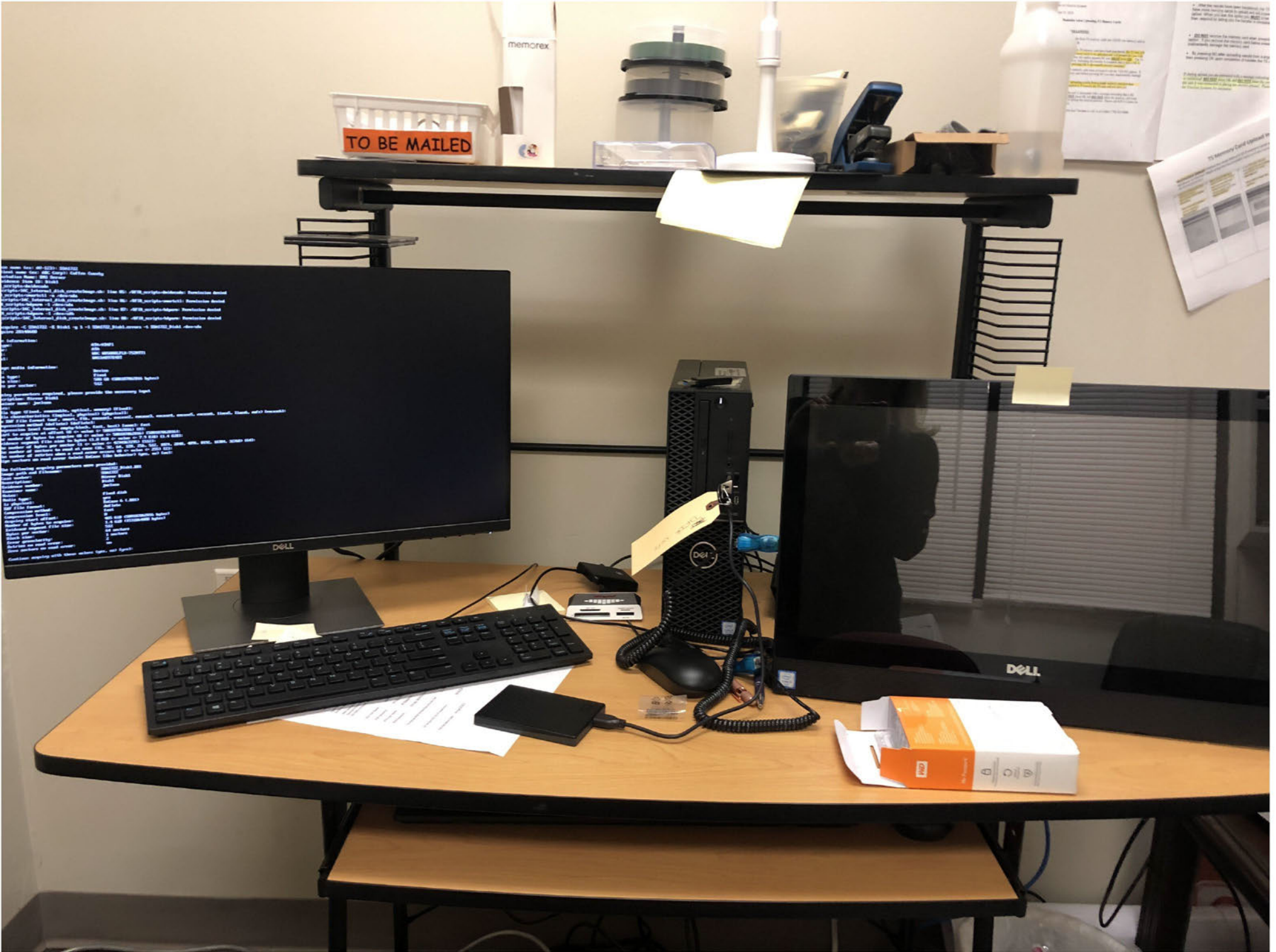
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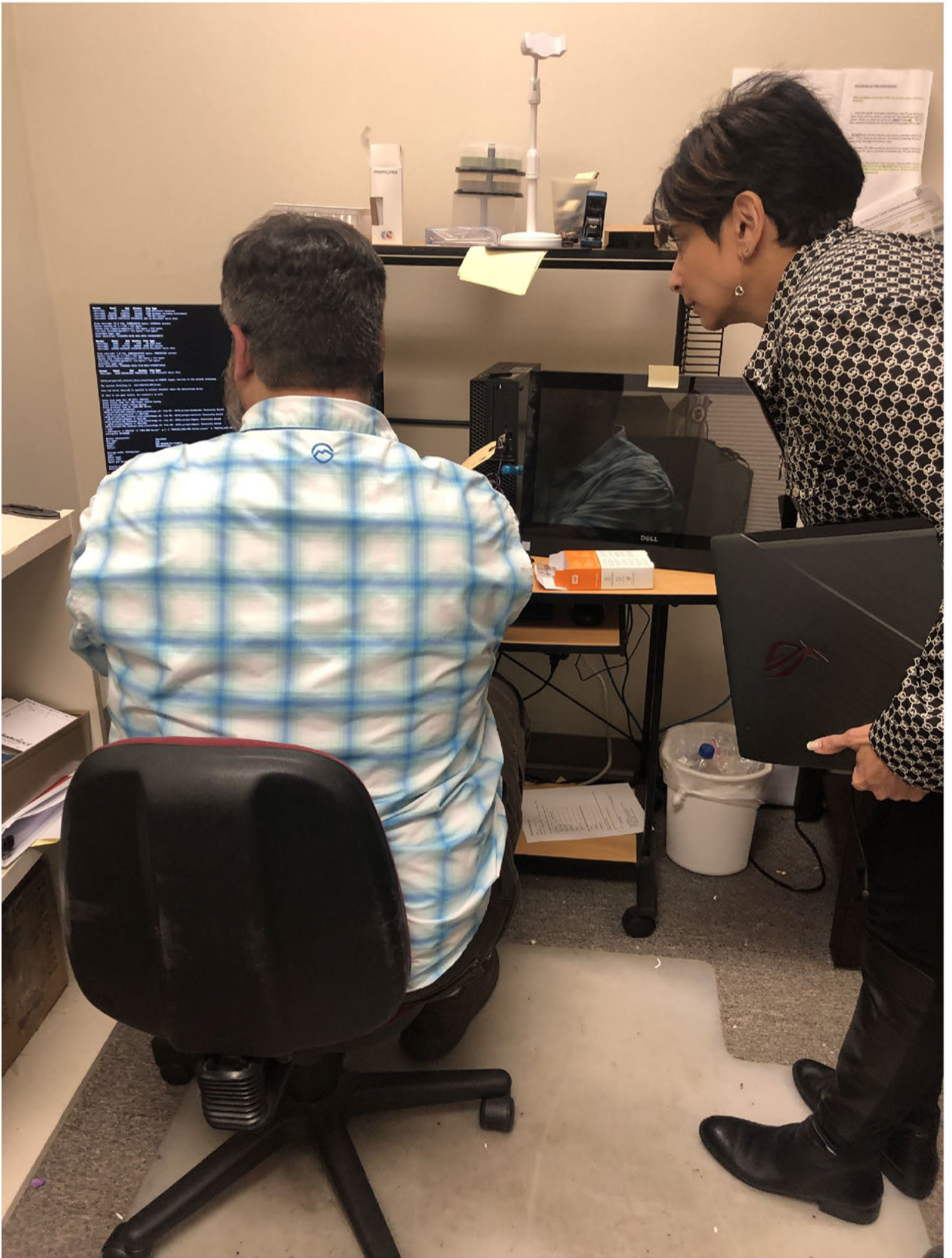




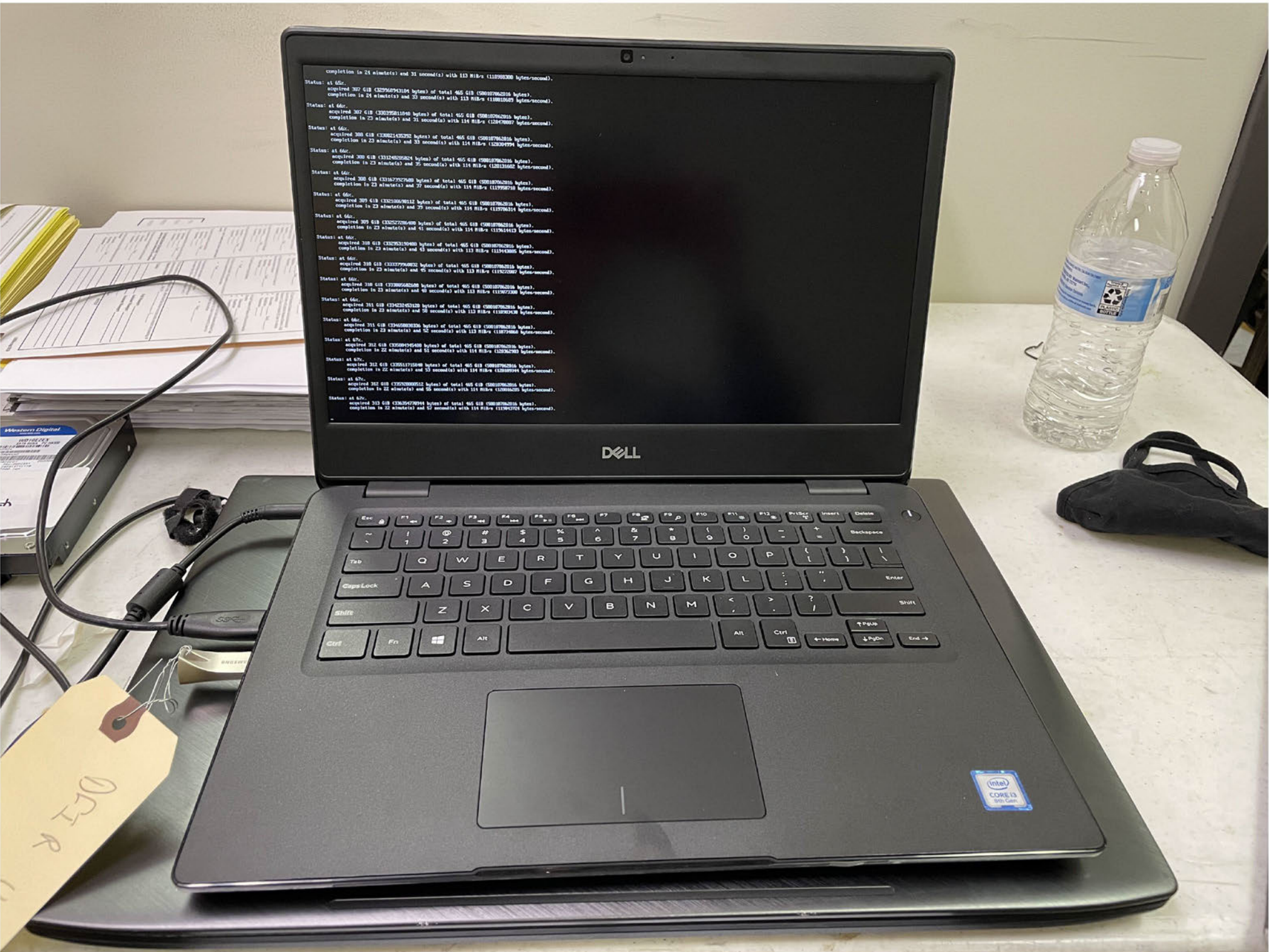
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completion in 24 minute(s) and 31 second(s) with 113 MiB/s (119700200 bytes-second).
Status: at 66s.
acquired 307 618 (32956994104 bytes) of total 465 618 (500107062016 bytes).
completion in 24 minute(s) and 23 second(s) with 113 MiB/s (1188106209 bytes-second).
Status: at 66s.
acquired 307 618 (320292011040 bytes) of total 465 618 (500107062016 bytes).
completion in 23 minute(s) and 31 second(s) with 114 MiB/s (120470009 bytes-second).
Status: at 66s.
acquired 308 618 (338821423202 bytes) of total 465 618 (500107062016 bytes).
completion in 23 minute(s) and 33 second(s) with 114 MiB/s (1203009794 bytes-second).
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completion in 23 minute(s) and 29 second(s) with 114 MiB/s (119920710 bytes-second).
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completion in 22 minute(s) and 55 second(s) with 114 MiB/s (120000000 bytes-second).
Status: at 67s.
acquired 313 618 (336364700014 bytes) of total 465 618 (500107062016 bytes).
completion in 22 minute(s) and 57 second(s) with 114 MiB/s (119900000 bytes-second).

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Message

**From:** Paul Maggio (SullivanStrickler LLC) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D28514533953469481BEA9CCF458387C-PMAGGIO]  
**Sent:** 1/8/2021 3:48:30 PM  
**To:** Sidney Powell [REDACTED]  
**CC:** Tricia [REDACTED]; Jim Penrose [REDACTED]; Brendan Sullivan ([REDACTED]) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dfa70c8a5eeb4fa683d2a1f757b68fae-bsullivan]; Doug Logan [Doug [REDACTED]]; [REDACTED]  
**Subject:** RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement  
**Attachments:** SSA1722 inv 4205.pdf

Sidney,

Everything went smoothly yesterday with the Coffee County collection. Everyone involved was extremely helpful.

We are consolidating all of the data collected and will be uploading it to our secure site for access by your team. Hopefully we can take care of payment today.

Thank you and let us know if there is anything else that you need.

Paul Maggio  
COO

[REDACTED]  
SullivanStrickler, LLC  
[pmaggio@sullivanstrickler.com](mailto:pmaggio@sullivanstrickler.com)  
[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

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**From:** Paul Maggio (SullivanStrickler LLC)  
**Sent:** Thursday, January 7, 2021 4:10 PM  
**To:** Sidney Powell <sidney@federalappeals.com>  
**Cc:** Tricia <tricia@federalappeals.com>; Jim Penrose <jim@fightback.law>; Brendan Sullivan (SullivanStrickler LLC) <bsullivan@sullivanstrickler.com>; Doug Logan <Doug@fightback.law>  
**Subject:** RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement

Everything is going well here in Coffee County GA

Can we get some sort of confirmation that the payment is being sent this afternoon?

Thank you

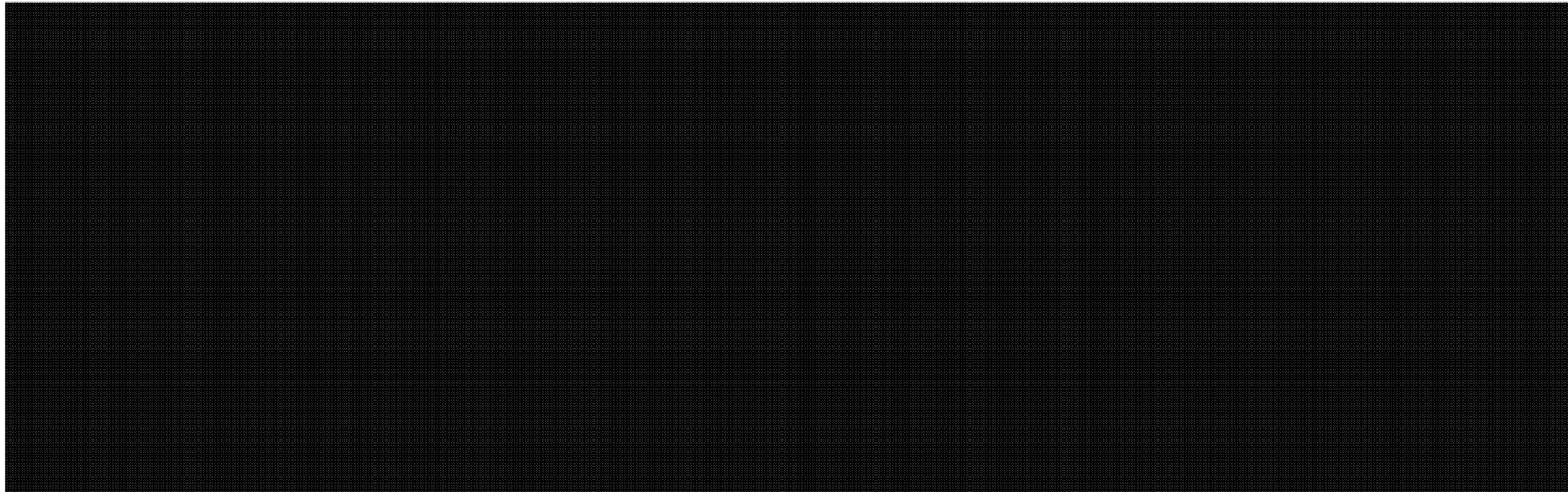
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[REDACTED]  
SullivanStrickler, LLC  
[REDACTED]

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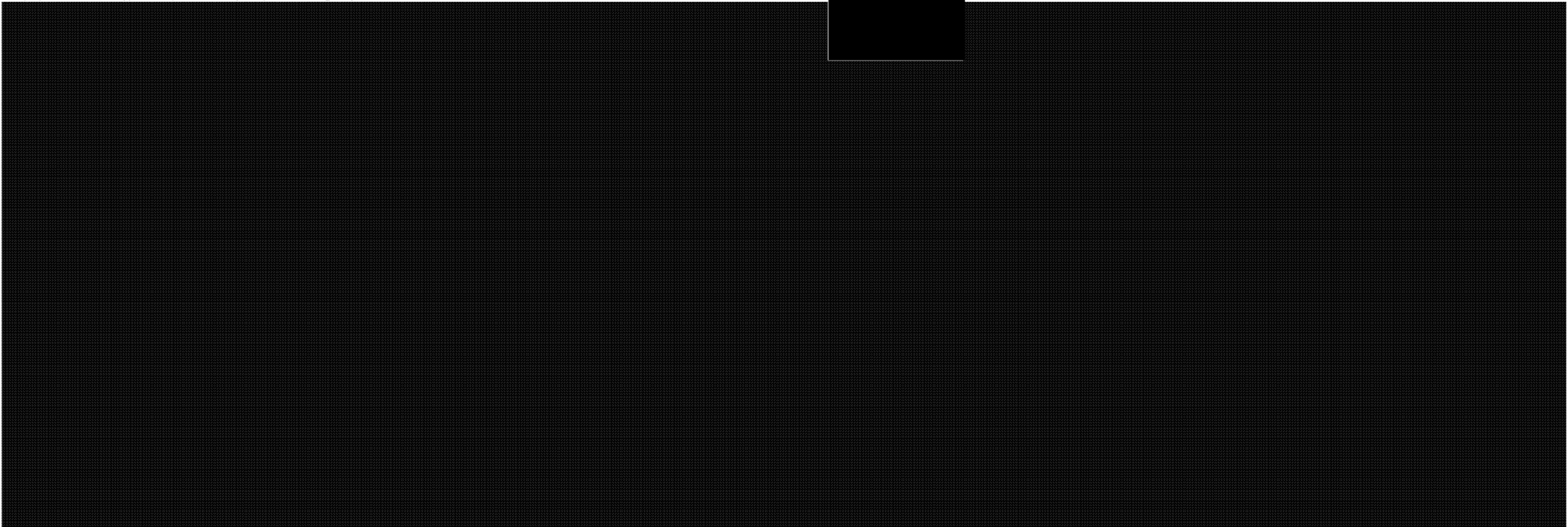
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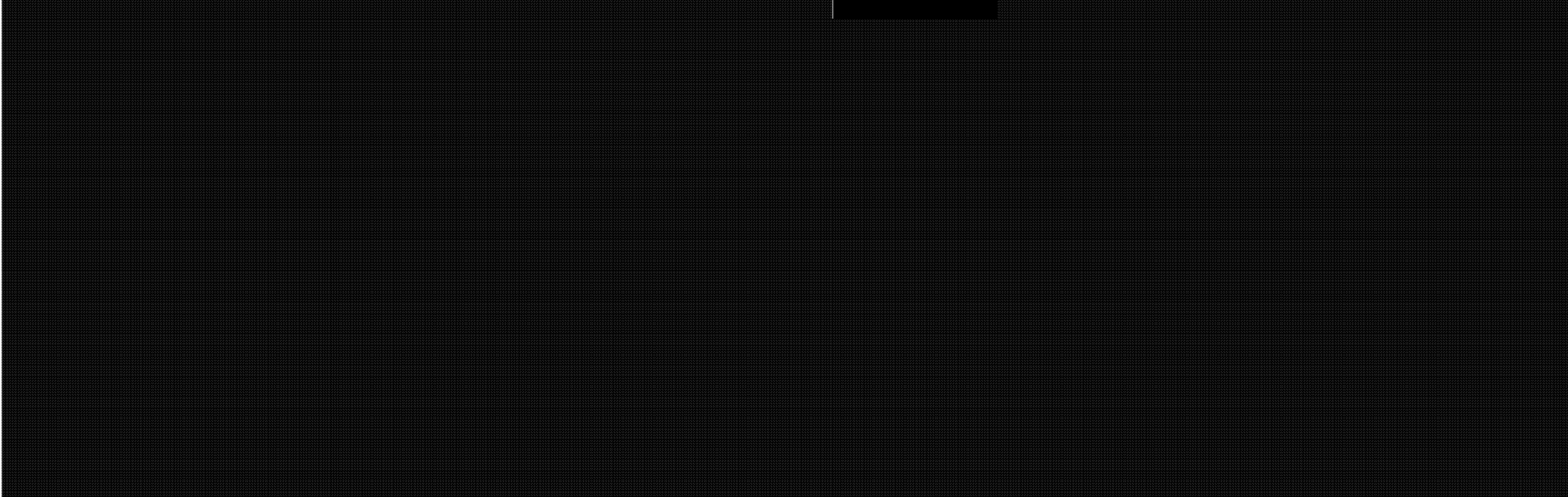
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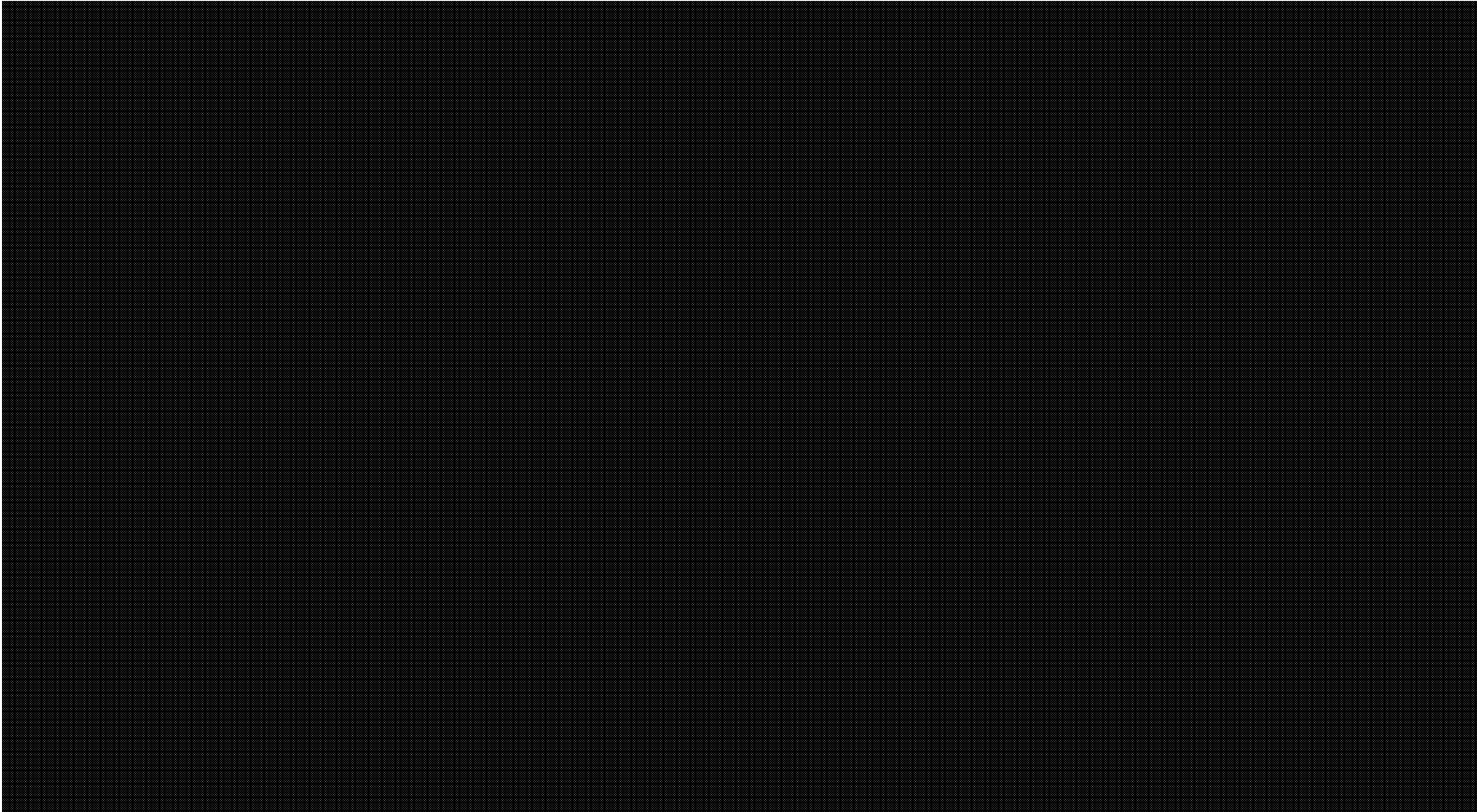


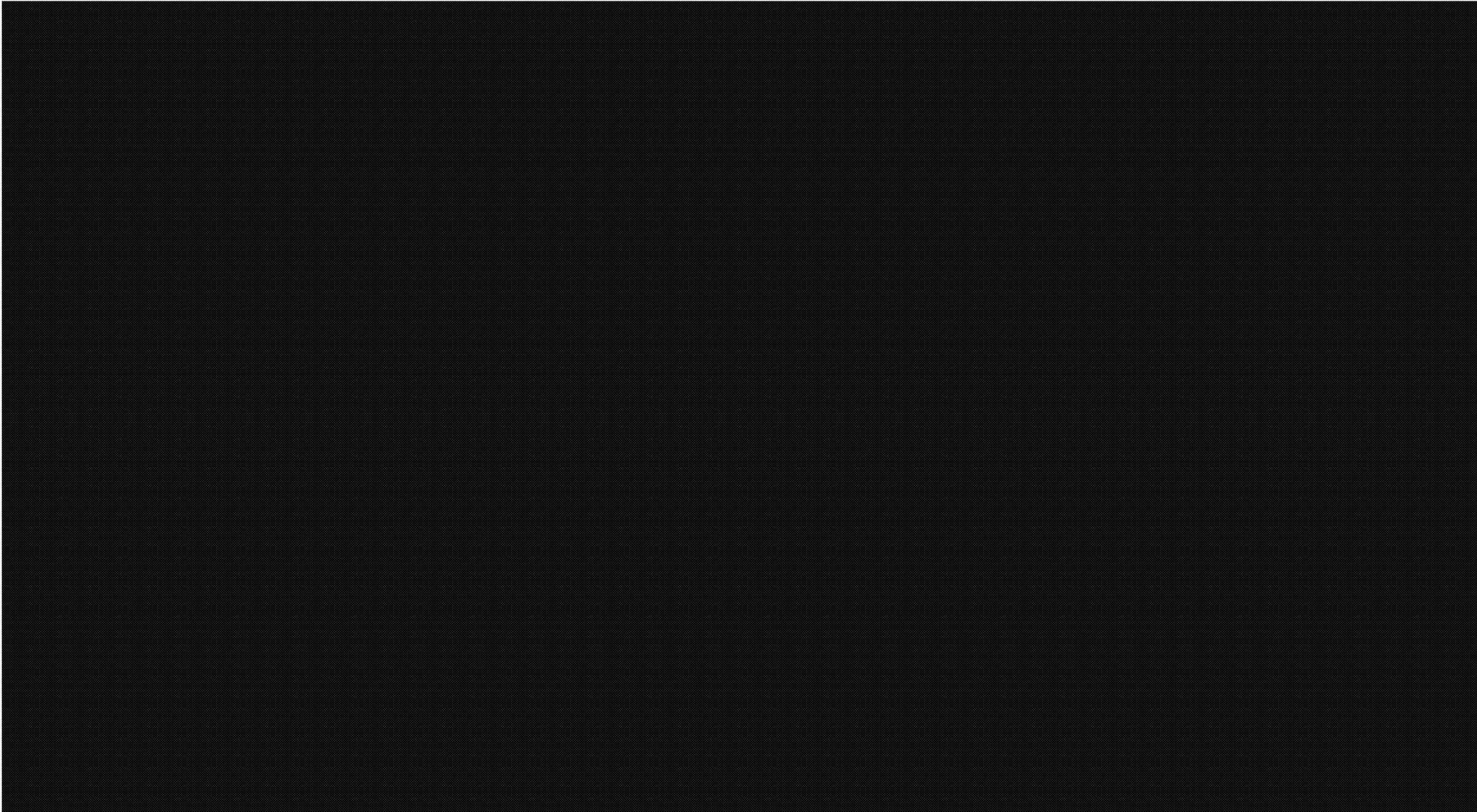


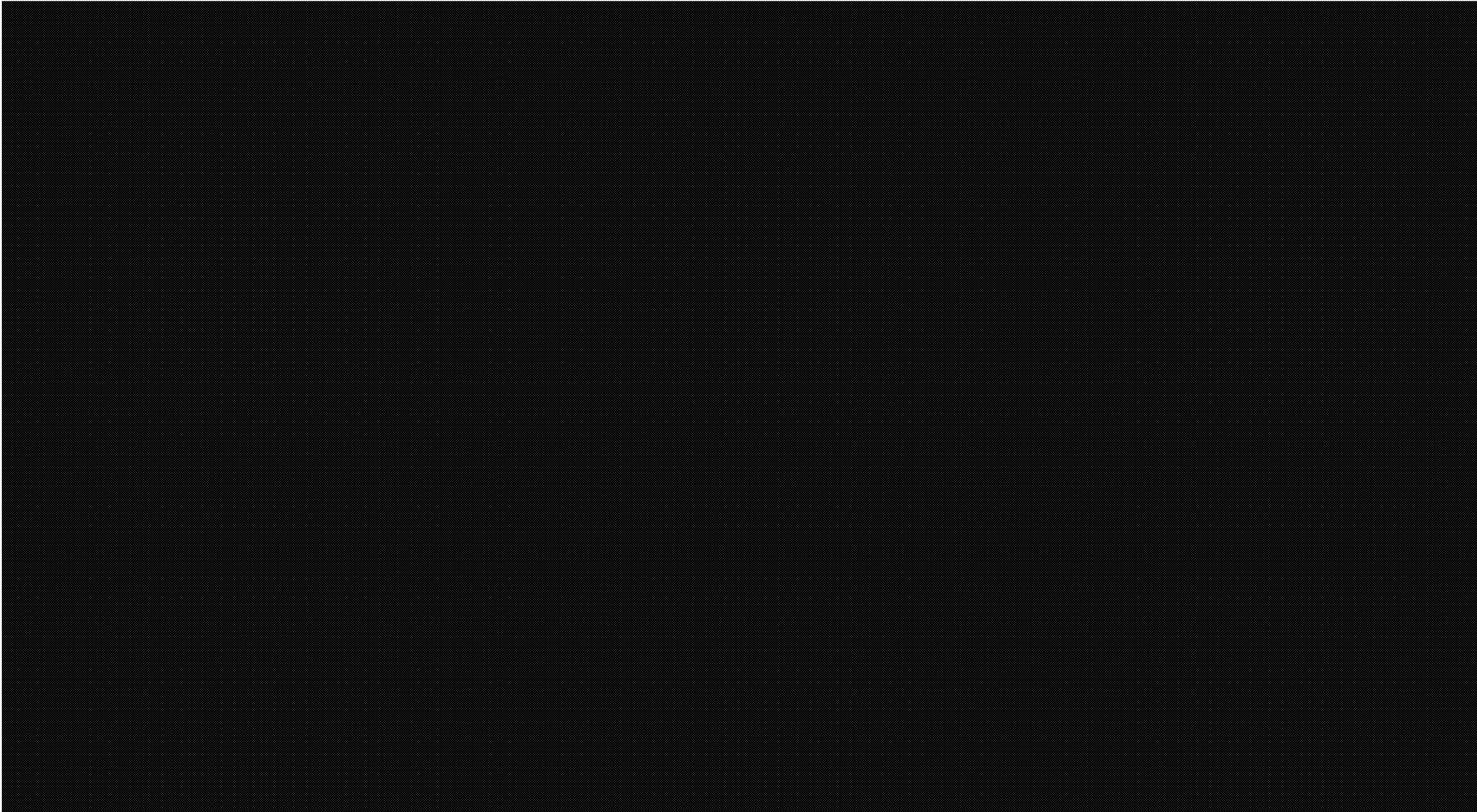
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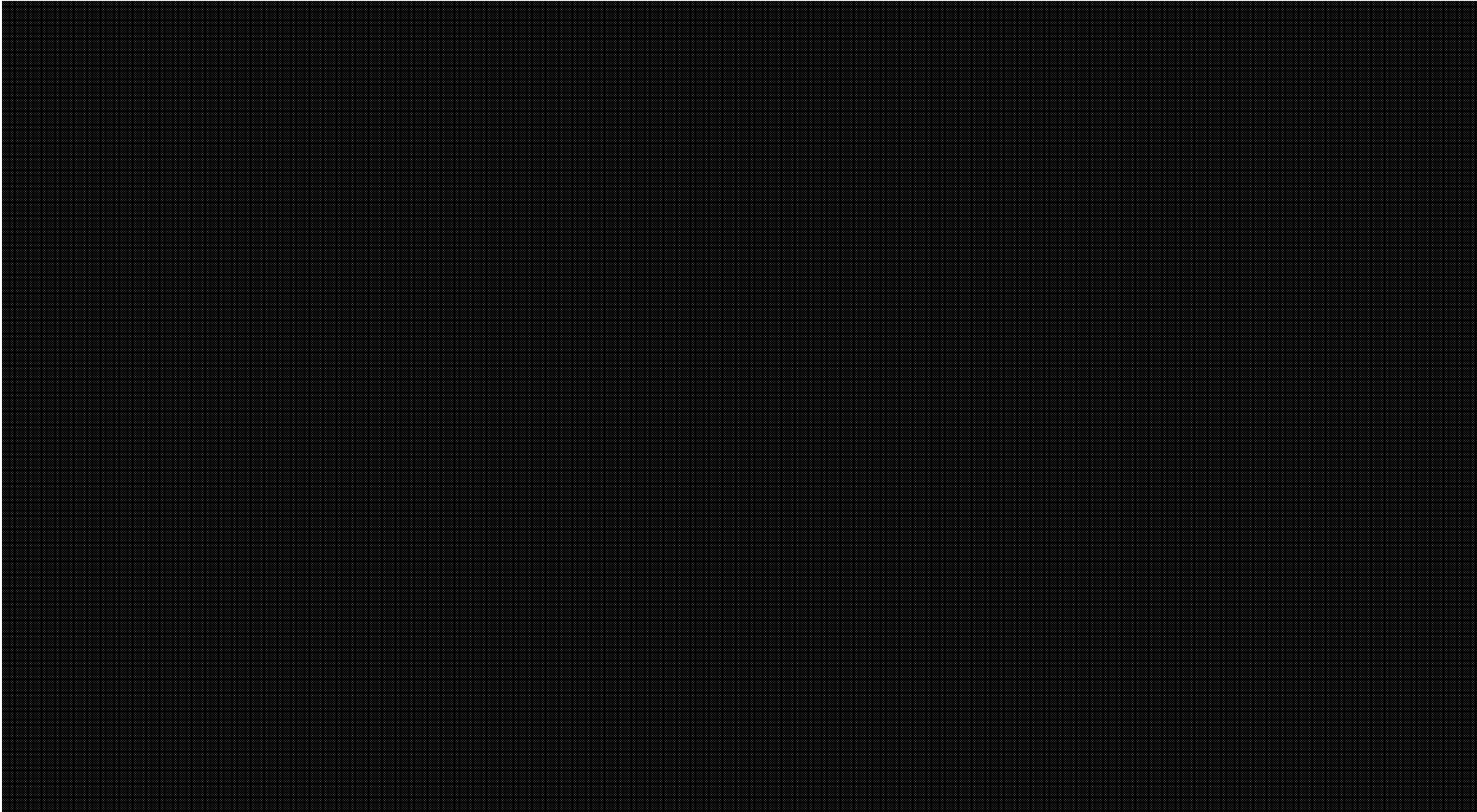
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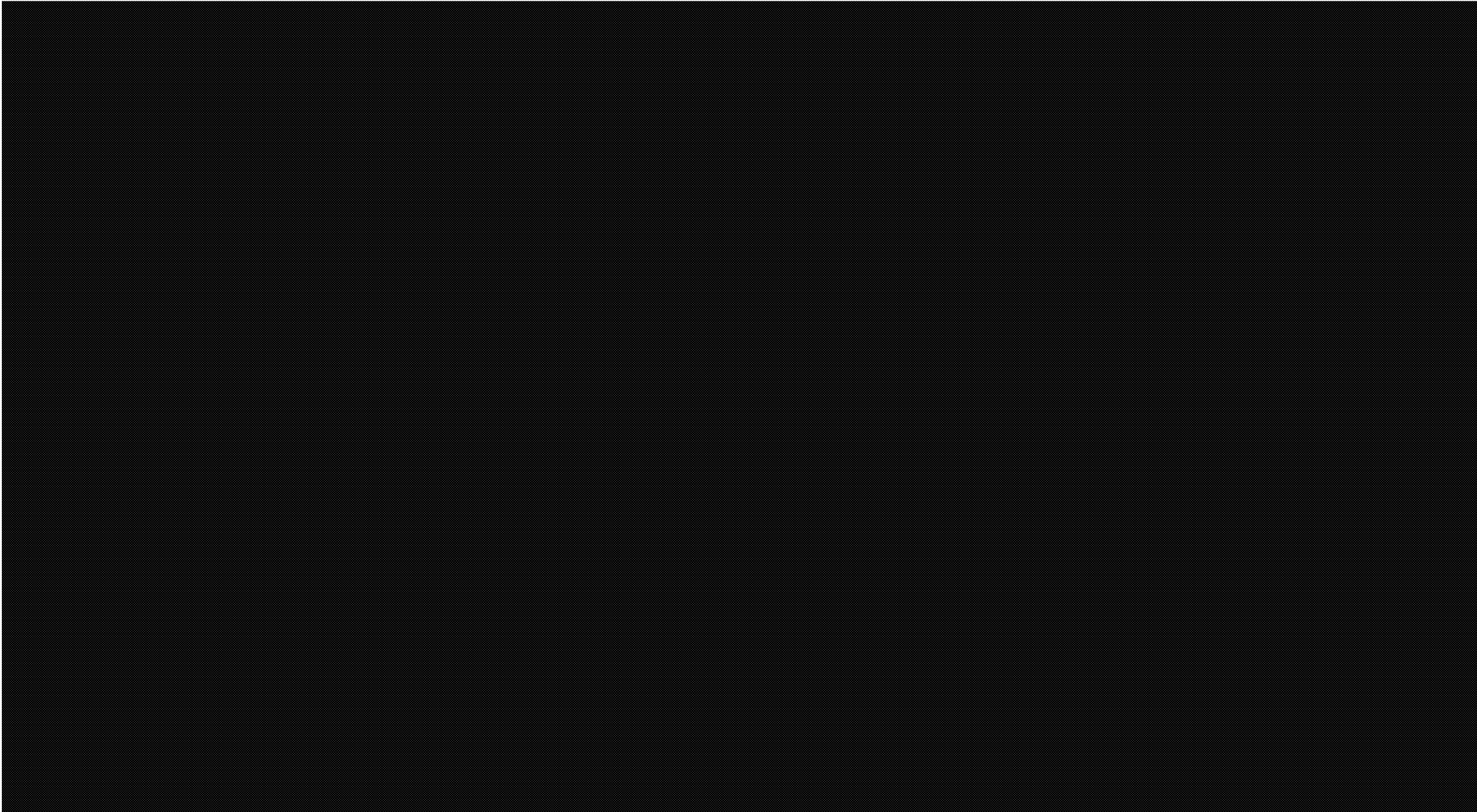




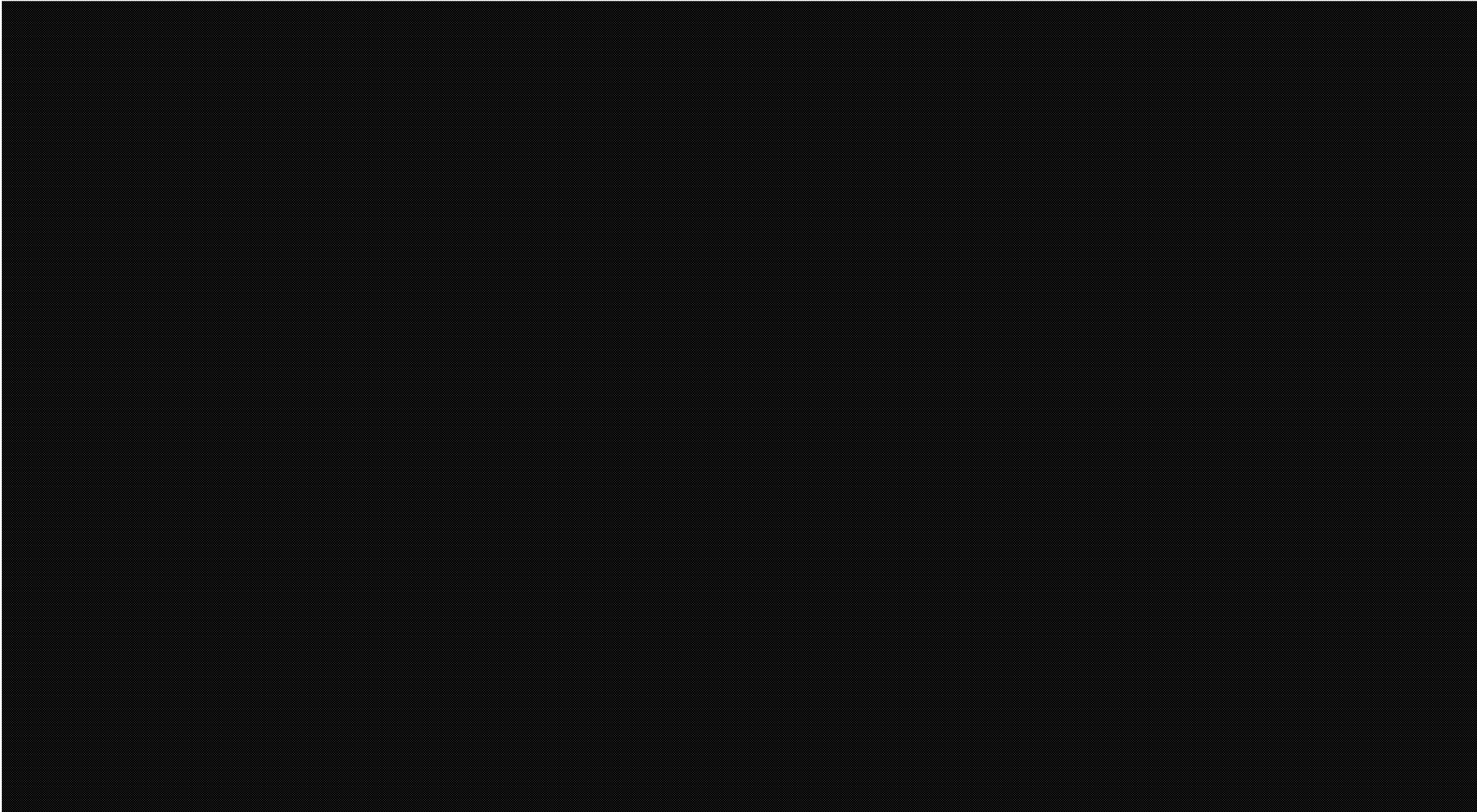


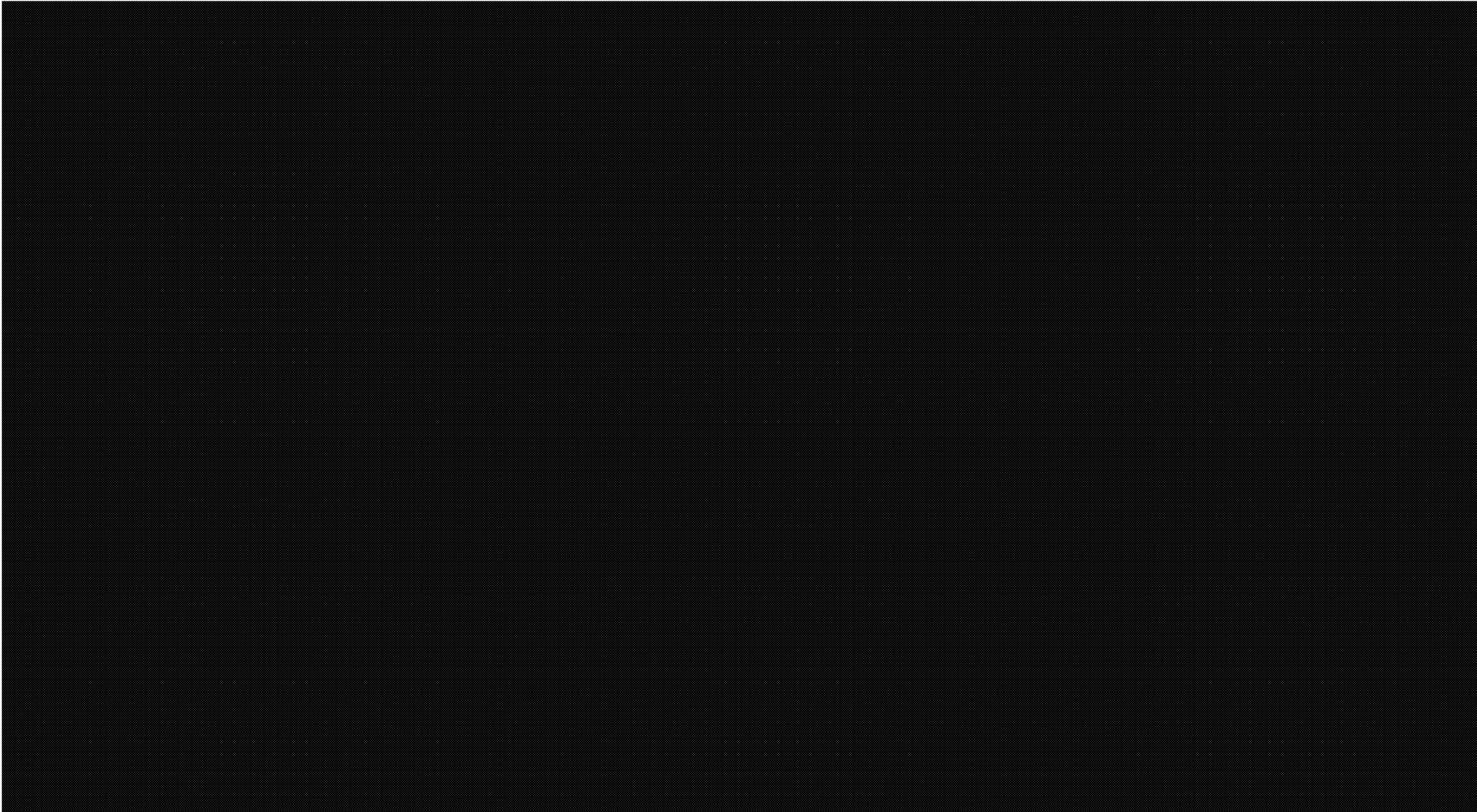


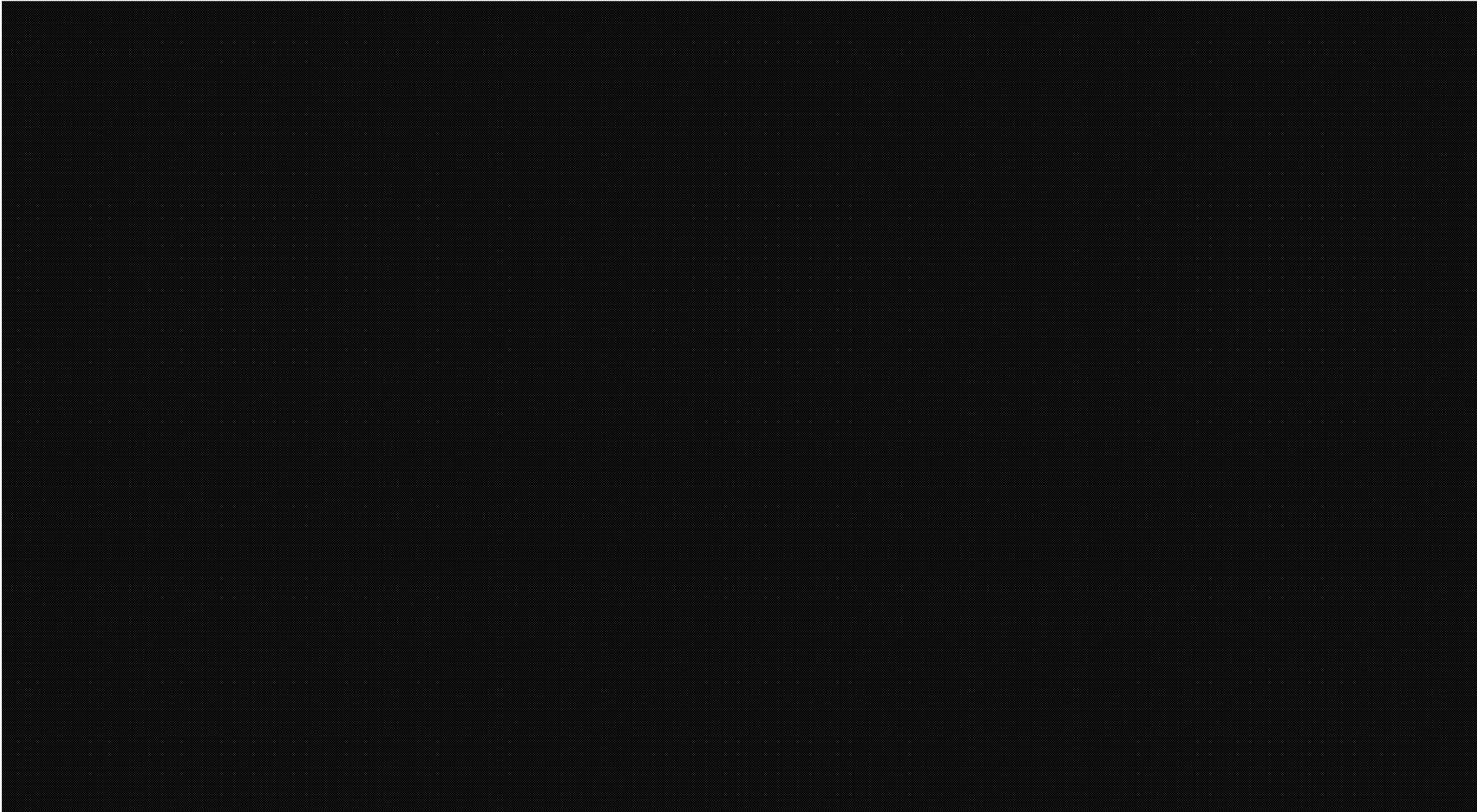


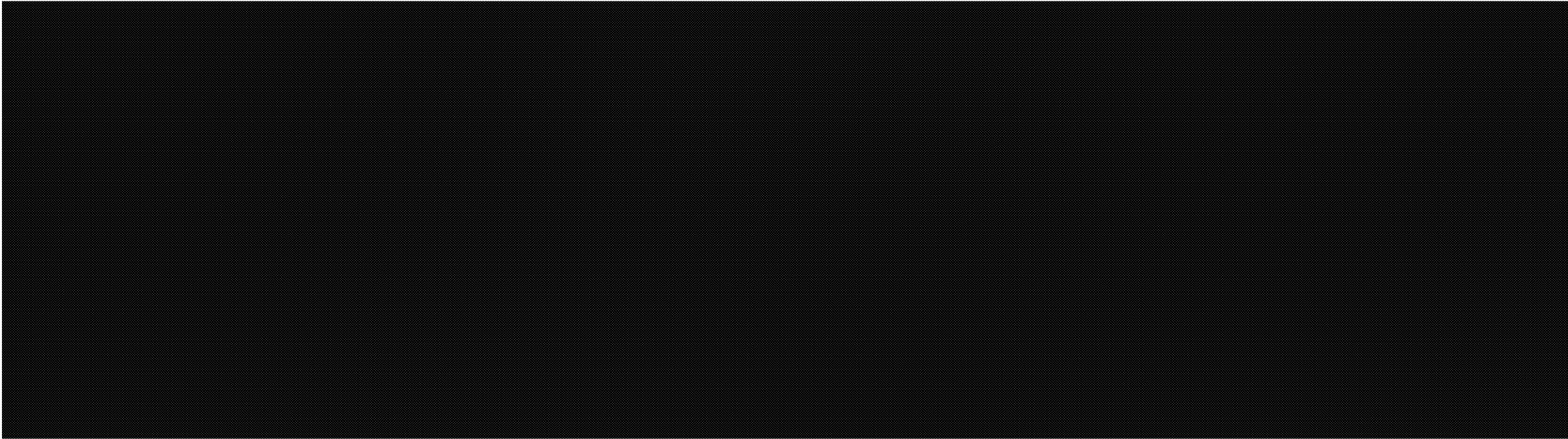












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T

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/Temp/SSA1722/DJL Upload/	Antrim - EMS	B	Administrator	SullivanStrickler. LLC	TRUE	TRUE	TRUE	TRUE	FALSE	FALSE	TRUE
/Temp/SSA1722/DJL Upload/	Antrim - EMS	Michal	Pospieszalski	Mehow Consulting, LLC	TRUE	TRUE	FALSE	FALSE	FALSE	FALSE	TRUE
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/Temp/SSA1722/DJL Upload/	Antrim - EMS	Tamara	Wright	SullivanStrickler
/Temp/SSA1722/DJL Upload/	Antrim - EMS	Jim	Penrose	Defending The Republic
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/Temp/SSA1722/DJL Upload/	Coffee - ICC	Tamara	Wright	SullivanStrickler
/Temp/SSA1722/DJL Upload/	Coffee - ICC	Jim	Penrose	Defending The Republic



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**FILED**

Sheryl Guy

Antrim 13th Circuit Court  
04/09/2021

**STATE OF MICHIGAN**

**IN THE CIRCUIT COURT FOR THE COUNTY OF ANTRIM**

WILLIAM BAILEY

Plaintiff

Case No. 20-9238-CZ

v.

ANTRIM COUNTY

HON. KEVIN A. ELSENHEIMER

Defendant,

SECRETARY OF STATE JOCELYN  
BENSON

Intervenor-Defendant,

---

Matthew S. DePerno (P52622)  
DEPERNO LAW OFFICE, PLLC  
Attorney for Plaintiff  
951 W. Milham Avenue  
PO Box 1595  
Portage, MI 49081  
(269) 321-5064

---

Haider A. Kazim (P66146)  
CUMMINGS, MCCLOREY, DAVIS & ACHO, PLC  
Attorney for Defendant  
319 West Front Street  
Suite 221  
Traverse City, MI 49684  
(231) 922-1888

Heather S. Meingast (P55439)  
Erik A. Grill (P64713)  
Assistant Attorneys General  
Attorneys for Proposed Intervenor-Defendant  
Benson  
PO Box 30736  
Lansing, MI 48909  
(517) 335-7659

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**PLAINTIFF'S FIRST AMENDED EXPERT WITNESS LIST**

Plaintiff WILLIAM BAILEY, by and through his attorney, DePERNO LAW OFFICE, PLLC, submit for his First Amended Expert Witness List the following:

1. James Penrose; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Mr. Penrose is expected to testify as to election integrity, systems, process, generally accepted practices, standards of care, and election voting systems, including the Dominion Voting Systems. He is expected to testify regarding adjudication logs, systems

files, applications security issues, cyber/computer network operations, data analysis, and operations integration in computer and voting systems. He is expected to base his testimony on his review and analysis of election data and materials, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

2. Ben Cotton; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Cotton is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic images of voting equipment used in Michigan in the November 3, 2020 election. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will be generated in this matter, documentation regarding the forensic images, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

3. Doug Logan; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Logan is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic image. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will be generated in this matter, documentation regarding the forensic images, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

4. Greg Freemyer; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Freemyer is expected to testify regarding the identification and forensic imaging and preservation of the Antrim County election management server, thumb drives, and compact flash cards performed in this case. He is expected to base his testimony on his knowledge and review of the forensic imaging process obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout

course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

5. Paul Maggio; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Maggio is expected to testify regarding the identification and forensic imaging and preservation of the Antrim County election management server, thumb drives, and compact flash cards performed in this case. He is expected to base his testimony on his knowledge and review of the forensic imaging process obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

6. Col. James P. (Phil) Waldron; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Col. Waldron is expected to testify as to election integrity, systems, process, generally accepted practices, standards of care, and election voting systems, including the Dominion Voting Systems. He is expected to testify regarding adjudication logs, systems files, applications security issues, and the review and preparation of the Antrim Michigan Forensics Report, Revised Preliminary Summary, v2, dated December 13, 2020 ("ASOG Report"). He is expected to testify regarding cyber/computer network operations, data analysis, and operations integration in computer and voting systems. He is expected to documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

7. Russel Ramsland; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Ramsland is expected to testify as to election integrity, systems, process, generally accepted practices, standards of care, and election voting systems, including the Dominion Voting Systems. He is expected to testify regarding adjudication logs, systems files, applications security issues, and the review and preparation of the Antrim Michigan Forensics Report, Revised Preliminary Summary, v2, dated December 13, 2020 ("ASOG Report"). He is expected to testify regarding cyber/computer network operations, data analysis, and operations integration in computer and voting systems. He is expected to testify on how the Dominion Voting Systems affects elections. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

8. Dr. Douglas G. Frank; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Dr. Frank is expected to testify as to his analysis of data, conclusions, and his Report pertaining to the November 3, 2020 election.

9. Seth Keshel; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Mr. Keshel is expected to testify as to his analysis of data, and conclusions pertaining to the November 3, 2020 election.

10. Jeffrey Lenberg; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Mr. Lenberg is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic image. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will be generated in this matter, documentation regarding the forensic images, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

11. Todd Sanders; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Mr. Sanders is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic image. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will be generated in this matter, documentation regarding the forensic images, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

12. Conan Hayes; **EXPERT WITNESS**; c/o Deperno Law Office, PLLC

Mr. Sanders is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic image. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will

be generated in this matter, documentation regarding the forensic images, his Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

13. Any rebuttal or impeachment witness necessary to rebut any evidence or testimony presented by any other party to this lawsuit.
14. Any expert witness required to rebut evidence presented by Defendants
15. Plaintiffs reserve all rights to identify further witnesses as they become known.

Respectfully submitted

DePERNO LAW OFFICE, PLLC

Dated: April 8, 2020

/s/ Matthew S. DePerno

Matthew S. DePerno (P52622)

Attorney for Plaintiff

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Message

**From:** Paul Maggio (SullivanStrickler LLC) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D28514533953469481BEA9CCF458387C-PMAGGIO]  
**Sent:** 4/22/2021 5:49:22 PM  
**To:** JP Comms [REDACTED]  
**CC:** Federalattorney [REDACTED]; Greg Freemyer (SullivanStrickler LLC) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e6d68623db1743c9a31dc4391c56d623-gfreemyer]  
**Subject:** RE: Coffee County Forensics FEDEX Request

Jim / Stefanie,

This is received and we will begin the process of copying everything to a drive.

Paul Maggio  
COO

[REDACTED]  
[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

**From:** JP Comms [REDACTED]  
**Sent:** Thursday, April 22, 2021 1:42 PM  
**To:** Paul Maggio (SullivanStrickler LLC) <pmaggio@sullivanstrickler.com>  
**Cc:** Federalattorney [REDACTED]; Greg Freemyer (SullivanStrickler LLC)  
[REDACTED]  
**Subject:** Coffee County Forensics FEDEX Request

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Paul,

Can you please FEDEX all the forensics material from the Coffee County acquisition to the same address as before. Please include the VMs on your download site as well.

Invoice Stefanie Lambert for the work like last time.

Thanks,  
Jim Penrose

[REDACTED]  
Sent with [ProtonMail](#) Secure Email.

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Message

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**From:** Paul Maggio (SullivanStrickler LLC) [REDACTED]  
**Sent:** 4/27/2021 8:22:48 PM  
**To:** Khaleelah Lankford (SullivanStrickler LLC) [REDACTED] Karuna Naik (SullivanStrickler LLC)  
[REDACTED] Brad Ott (SullivanStrickler LLC) [bott@sullivanstrickler.com]  
**CC:** Karen Wilson (SullivanStrickler LLC) [REDACTED]  
**Subject:** SSA1722 Coffee County Drive Shipment Label  
**Attachments:** SSA1722 Coffee County Data to Federal Attorney Shipping Label.pdf

Khaleelah,

If you can, please get this out tonight.

Attached is the shipping label and receipt. Put the receipt on Karen's desk and I will get with her to take care of the invoice.

Thank you all for your help.

Paul Maggio  
COO

[REDACTED]  
[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

"Providing Access to the World's Legacy Data"

[Check out our web site to learn more](#)



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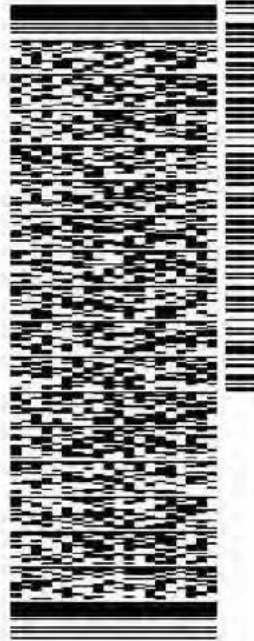
ORIGIN ID:DRMA (678) 622-9675  
KAREN WILLSON  
SULLIVANSTRICKLER LLC  
4532 OLD JONESBORO RD  
FOREST PARK, GA 30297  
UNITED STATES US

SHIP DATE: 27APR21  
ACTWGT: 2.00 LB  
CAD: 108720110INNET4340  
BILL SENDER

TO STEFANIE LAMBERT  
FEDERAL ATTORNEY

ROYAL OAK MI 48067

(248) 270-6689 REF:SSA1722  
INV. PO DEPT



56D.J3F9A5/FE1A

TRK# 7735 6583 1280  
0201

WED - 28 APR 10:30A  
PRIORITY OVERNIGHT

NL DETA

MI-US 48067  
DTW



**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



## Shipment Receipt

**Address Information****Ship to:**

Stefanie Lambert  
Federal Attorney

[REDACTED]  
ROYAL OAK, MI  
48067  
US  
248-270-6689

**Ship from:**

Karen Wilson  
SullivanStrickler, LLC

[REDACTED] A

**Shipment Information:**

Tracking no.: 773565831280

Ship date: 04/27/2021

Estimated shipping charges: 60.79 USD

**Package Information**

Pricing option: FedEx Standard Rate

Service type: Priority Overnight

Package type: FedEx Box

Number of packages: 1

Total weight: 2 LBS

Declared Value: 5.00 USD

Special Services:

Pickup/Drop-off: Drop off package at FedEx location

**Billing Information:**

Bill transportation to: My Account - 808-808

Your reference: SSA1722

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at [fedex.com](https://www.fedex.com).

**Please Note**

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1000, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits; Consult the applicable FedEx Service Guide for details. The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the FedEx Rate Sheets for details on how shipping charges are calculated.

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Ben Cotton Signal  
&

Coffe County  
related emails.



From  Douglas Logan [redacted] >

  Mar 24, 2021

3

To Mistyhampton [redacted] [redacted] [redacted]

Event already ended

**(no title)**

Wed, Mar 24, 2021, 11:30 AM – 4:00 PM

**Attending?** Yes Maybe No

● My calendar

📍 Microsoft Teams Meeting

👤 Organizer: [Douglas Logan](#) [redacted]

2 participants [Show](#)

[Faint, illegible text at the top of the page]

[Faint, illegible text in the upper right section]

[Faint, illegible text in the middle right section]

[Faint, illegible text at the bottom right]





**Ben Cotton**



Member of Halderman\_Rebuttal\_Report\_Coord and Sql

 For your security, conversation history isn't transferred to new linked devices.

Thu, Sep 29

Hi Ben. I heard you were deposed in Georgia. Were there really 22 lawyers and Halderman at your deposition? 2:23 PM 

✓ You marked your Safety Number with Ben Cotton as verified

Yep, about 9 hours worth :) 6:42 PM

 Incoming audio call · 6:42 PM

[Call Back](#)

... ..



BC

Ben Cotton

Verified



7



Yep, about 9 hours worth :) 6:42 PM

Incoming audio call 6:42 PM

Call Back

Fri, Sep 30

ZIP

BenjaminRCottonTranscript.zip

75.55 KB

Int3grity 7:13 AM



7:18 AM

I won't be able to join today. Sorry. 12:05 PM

Wrong persone? 1:03 PM



Yup sorry 4:54 PM

Sat, Oct 1

This message was deleted. 8:41



Message







# Re: FW: Coffee County Forensics FEDEX Request

From VAguy20 [redacted]

To Federalattorney [redacted]

Date Wednesday, April 28th, 2021 at 7:58 PM

Got it.

Sent with [ProtonMail](#) Secure Email.

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

On Wednesday, April 28, 2021 7:55 PM, Federalattorney [redacted]

Sent from ProtonMail for iOS

----- Forwarded message -----

From: Federalattorney [redacted]  
Date: On Wed, Apr 28, 2021 at 9:54 PM  
Subject: FW: Coffee County Forensics FEDEX Request  
To: JP Comms [redacted]  
Cc: [redacted]

Sent from ProtonMail for iOS

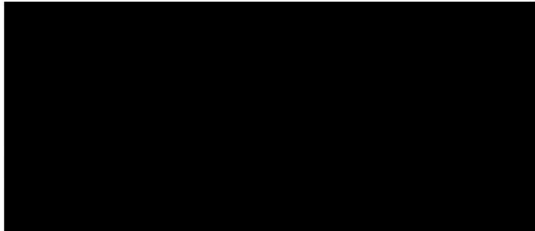
----- Forwarded message -----

From: Paul Maggio (SullivanStrickler LLC) [redacted]  
Date: On Tue, Apr 27, 2021 at 4:25 PM  
Subject: FW: Coffee County Forensics FEDEX Request  
To: Federalattorney [redacted]  
Cc: Greg Freemyer (SullivanStrickler LLC) [redacted]

Bitlocker Password:

  
Paul Maggio

COO



[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

**From:** Paul Maggio (SullivanStrickler LLC)

**Sent:** Tuesday, April 27, 2021 4:24 PM

**To:** Federalattorney <Federalattorney@protonmail.com>

**Cc:** JP Comms <[redacted]> eg Freemyer (SullivanStrickler LLC)

**Subject:** RE: Coffee County Forensics FEDEX Request

Stephanie,

This is going out tonight

Fed Ex Tracking #: 7735 6583 1280

Bitlocker password coming to you in a follow up e-mail.

Paul Maggio

COO



SullivanStrickler, LLC

[Redacted]

[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

**From:** Federalattorney [Redacted]  
**Sent:** Thursday, April 22, 2021 1:50 PM  
**To:** Paul Maggio (SullivanStrickler LLC) [Redacted]  
**Subject:** RE: Coffee County Forensics FEDEX Request

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Thank you!

Sent from ProtonMail for iOS

On Thu, Apr 22, 2021 at 1:49 PM, Paul Maggio (SullivanStrickler LLC) [Redacted] wrote:

Jim / Stefanie,

This is received and we will begin the process of copying everything to a drive.

Paul Maggio

COO

[Redacted]

SullivanStrickler, LLC

[Redacted]  
[Redacted]

[www.sullivanstrickler.com](http://www.sullivanstrickler.com)

**From:** JP Comms [REDACTED]  
**Sent:** Thursday, April 22, 2021 1:42 PM  
**To:** Paul Maggio (SullivanStrickler LLC) <[REDACTED]>  
**Cc:** Federalattorney [REDACTED] Greg Freemyer (SullivanStrickler LLC)  
**Subject:** Coffee County Forensics FEDEX Request

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Paul,

Can you please FEDEX all the forensics material from the Coffee County acquisition to the same address as before. Please include the VMs on your download site as well.

Invoice Stefanie Lambert for the work like last time.

Thanks,

Jim Penrose

[REDACTED]

Sent with [ProtonMail](#) Secure Email.



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August 19, 2022

**VIA EMAIL and U.S. MAIL:**

Mary G. Kaiser  
Morrison & Foerster LLP  
2100 L Street NW, Suite 900  
Washington, DC 20037

*Re: Curling v. Raffensberger*, No. 1:17-CV-02989-AT  
Subpoenas to Benjamin R. Cotton

Dear Ms. Kaiser:

Enclosed are non-privileged documents responsive to both of the subpoenas served on Mr. Cotton by the plaintiffs in the above referenced matter, as those subpoenas have been modified by subsequent discussions of counsel and the August 9, 2022 letter of David Cross. I am enclosing the following documents:

- Agreement Regarding Services dated March 21, 2021, Bates BC0001-BC0004
- Engagement letter dated July 3, 2021, with attached Non-Disclosure Agreement, Bates BC0005-BC0008

As counsel have been previously informed, Mr. Cotton has been retained as a non-testifying expert in connection with anticipated litigation on behalf of parties in Fulton and Coffee counties in Georgia. Documents responsive to the subpoena were provided to him in connection with that anticipated litigation. Accordingly, of the few responsive documents he possesses, many are subject to the protections of Federal Rule of Civil Procedure 26(b)(4)(D). These documents may also be protected by the work-product privilege set forth in Rule 26(b)(3), 26(c) and Rule 45, as well as the attorney-client privilege. While not a privilege, these documents are also subject to the enclosed Non-Disclosure Agreement. Although courts have held that documents withheld pursuant to Rule 26(b)(4)(D) need not be logged on a privilege log, before the deposition, Mr. Cotton will provide

ANDREW D. PARKER  
CHRISTOPHER M. DANIELS  
JESSE H. KIBORT  
ELIZABETH S. WRIGHT  
ALEC J. BECK  
LORI A. JOHNSON  
JOSEPH A. PULL  
RYAN P. MALONE  
JORDON A. GREENLEE  
ABRAHAM S. KAPLAN  
GREGORY N. ARENSON  
REGINALD W. SNELL

FREDERICK C. BROWN  
OF COUNSEL

888 Colwell Building  
123 Third Street North  
Minneapolis, MN 55401

parkerdk.com

Tel: 612.355.4100  
Fax: 612.355.4101

you with a description of documents withheld pursuant to Rule 26(b)(4)(D) and any other privilege or protection.

As I explained on our call, Mr. Cotton is willing to produce withheld materials if the clients and counsel engaging him consent to waive the various privileges and protections. Some of the materials, however, may be subject to statutory and other restrictions on production to third parties. To the extent those restrictions apply, a court order would be required before he can produce them.

I am available to discuss this further with you.

Sincerely,

*/s/ Andrew D. Parker*

Andrew D. Parker

ADP/ESW

CC: David D. Cross  
Bruce P. Brown



20130 Lakeview Center Plaza  
Suite 120  
Manassas, VA 20110  
(703) 627-7933  
(703) 563-9389 (f)  
cyfir.com

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## AGREEMENT REGARDING SERVICES

This agreement regarding services ("Agreement") is entered into as of the last signature date shown below between Matt Deperno on behalf of Deperno Law Office, PLLC, and Stefanie Lambert Junttila on behalf of Stefanie L. Lambert PLLC ("Client") and CyFIR, LLC hereinafter referred to as CyFIR, concerning certain services to be performed by CyFIR for Client. Client and CyFIR agree that the following terms and conditions will apply in connection with such services.

### 1. Engagement and Scope of Work.

Client hereby authorizes CyFIR to provide the services described in Section 2 and CyFIR hereby agrees to provide the services in accordance with the terms of this Agreement. The parties may amend or add to Section 2 at any time upon mutually written agreement, and either party may terminate this Agreement upon written notice at any time, provided, however, that any such termination shall not affect in any way Client's obligation to pay for Services rendered up to the date of such termination.

### 2. Description of Services.

CyFIR will advise Client and provide professional services for issues relating to forensic imaging of hard drives, forensic imaging of storage media, live computer analysis, computer forensics, electronic discovery and expert witness support. CyFIR will provide Client with assistance in identifying possible sources of voting system compromise, attack vectors, relevant electronic data, provide technical advice in the remediation of identified exposures, offer guidance concerning the implementation of such requests and participate in possible legal processes associated with or stemming from the engagement.

CyFIR will conduct the forensic imaging, analysis, real time monitoring of end client computers and other computerized or electronic media that is attached to the remote endpoints using methods and software at the sole discretion of CyFIR, this will include proprietary software and other tools as needed. CyFIR will create and secure identical copies of such media as required as part of the investigations.

CyFIR will use the most cost effective means to analyze and convert data in order to create forensically sound images of the digital media and meaningful data formats. CyFIR will use the most cost effective processes available for reliable data conversion including use of CyFIR ("in-house") equipment and the use of qualified data conversion contractors working under the direct supervision of CyFIR personnel, if required.

CyFIR will maintain custody of the forensic data and images until all civil and/or criminal proceedings that may arise from the investigation or for a period not to exceed two years, at which time CyFIR will destroy the electronic evidence. Client will keep CyFIR apprised of the status of the case and will notify CyFIR in writing when the case has been concluded. CyFIR will destroy any remaining electronic evidence after a period of two (2) years has elapsed from the date of this agreement is executed unless notified by the Client to retain for a longer period. It is the Client's responsibility to notify CyFIR immediately before the two (2) year period elapses if the case is still active.

CyFIR will examine all available evidence in the case, provide an analysis of its findings, and will provide testimony in the matter as required.

**3. Fees and Expenses.**

All time expended in matters relating to this Agreement will be billed to the Client. CyFIR's fees are based on the amount of time spent providing the Services and other direct costs (ODC) associated with the engagement. These include, but may not be limited to, CyFIR licensing costs, application hosting costs and travel costs. While CyFIR may provide informal estimates of the amount of time necessary to perform the services described in this Agreement, Client understands that the actual time may vary considerably due to unforeseen complications and that no two incident response engagements, computer forensics examinations or e-Discovery cases are the same. Client understands that any informal estimate is not binding nor an all-inclusive cost for the engagement.

CyFIR computer forensics and incident response services are billed at \$300.00 USD per hour. Trial testimony, depositions, or other sworn testimony will be billed at \$450.00 USD per hour with a three (3) hour minimum and must be paid in advance. Client agrees to pay CyFIR on such hourly basis for the Services. There is a four (4) hour minimum expense for work requiring employees or representatives to leave CyFIR designated offices. Examiner travel is billed at \$300.00 per hour. Driving mileage is billed at the rate published by the IRS (currently \$0.535 per mile). Services billing is calculated in quarter-hour increments. Client also agrees to pay all incidental expenses reasonably incurred by CyFIR in connection with the Services, including but not limited to courier fees, travel expenses, shipping charges, disk or tape duplication, hosting costs, hard drives/media or other materials needed for the engagement at the cost of the expense plus a 6.54% G&A fee. Due to the unpredictable nature of Incident Response and computer forensic engagements, CyFIR will utilize fully reimbursable travel reservations to minimize change fee costs to the Client. Depending upon the engagement, and at the sole discretion of CyFIR, CyFIR will utilize the appropriate size of rental vehicle necessary to transport equipment and engagement related items.

Should the CyFIR enterprise forensics and incident response software platform be required for this engagement an Amazon AWS fee will be charged at cost to the client for the hosting of the CyFIR platform.

**4. Payment.**

CyFIR will bill Client on a schedule agreed upon by both parties. By default this will be a weekly billing cycle for all fees and expenses incurred in connection with the Service during the preceding billing period. All outstanding balances billed by CyFIR to Client are due upon receipt of the invoice. Payments are overdue if not received within thirty (30) days of Client's receipt of the invoice. Client will pay interest on any overdue payments at the rate of one and one half percent (1.5%) per month until all such amounts, including interest, are paid to CyFIR in full. The interest amount will be calculated from the invoice date. Any failed payment transactions will incur a \$150.00 failed transaction charge.

**5. Third Parties.**

Client shall be solely responsible for the payment of all fees and expenses as described in Sections 3 and 4. In the event that Client has arranged for a third party to pay CyFIR, CyFIR will accept payment from such third party in place of direct payment, but Client agrees that CyFIR shall under no circumstances be obligated to recover any outstanding fees or expenses from third parties on Client's behalf. Client may not assign any of its duties or obligations under this agreement without the express prior written consent of CyFIR.

**6. Work Product.**

All work products developed by CyFIR specifically for the Client in connection with the Services shall be deemed to be the property of Client. All intellectual property and processes developed and utilized in the production of work products shall be the sole property of CyFIR and CyFIR shall retain all ownership and title. Client acknowledges and

agrees that to the extent CyFIR uses general or pre-existing work products in its possession (e.g., survey information, or computer software/programs) in the course of performing the Services, CyFIR shall retain all ownership and title in and to all such work products.

**7. Confidentiality.**

The Non-Disclosure Agreement dated March 19, 2021 shall control all terms related to confidential information between the parties. Additionally, the Non-Disclosure Agreement dated March 19, 2021 shall control in the event this agreement contains inconsistencies or omissions.

**8. Instructions from Attorneys.**

In the case of any Service performed in connection with or anticipation of any legal action, Client agrees that CyFIR shall take instructions with regard to the Services from Client's attorney and shall work through such attorney in performing all Services. In the event that Client is a law firm or attorney and has engaged CyFIR to perform Services on behalf of a third party, CyFIR shall take instructions with regard to the Services from Client and shall work through Client in performing all such Services.

**9. Non-Solicitation.**

CyFIR and Client agree that for the duration of this Agreement, and for nine (9) months after this Agreement's termination, neither Party shall solicit any employees of the other who have worked on or performed Services in connection with the Services, without first obtaining the other Party's express written consent.

**9. Warranty and Remedies**

CyFIR warrants that it will perform the Services using industry standard practices, professional thoroughness and competence. No other warranty or representation, whether express or implied, is created by this Agreement or in connection with the Services. CyFIR's sole liability, and Client's sole remedy, in connection with this Agreement shall be limited to having CyFIR bear the reasonable cost of redoing (or, at CyFIR's option, having redone) any Services that do not meet the above warranty. Such remedy shall be available only in the event that Client reports in writing within sixty (60) days of such breach, and provides documentation of such breach. ***In no event shall CyFIR be liable for any consequential, incidental, or special damages whatsoever (including interruption, loss of business information, and the like) arising in connection with the Services or otherwise in connection with this agreement, even if CyFIR has been advised of the possibility of such damages.***

**10. Indemnification.**

Client warrants that client has legal access to all computers and media to be examined. Client agrees to indemnify and defend CyFIR, its owners, and its employees and agents against any legal action arising from CyFIR performing Services described in this Agreement.

**11. Controlling Law; Venue; Arbitration.**

This Agreement shall be governed by and construed in accordance with the laws of the Commonwealth of Virginia. Any controversy or claim arising out of or relating to this Agreement shall be settled by arbitration using a single arbitrator in Loudon County, Virginia and in accordance with the American Arbitration Association's rules of commercial arbitration (but not under AAA administration). Judgment upon any award rendered in such arbitration may be entered in any court having jurisdiction thereof. Notwithstanding the foregoing, any party shall be entitled to apply to any court to pursue expedited relief as necessary in connection with this Agreement, for example regarding injunctive relief, unlawful detainer, or claims in bankruptcy. In the event of legal action or arbitration commenced by either party in connection with this Agreement, the prevailing party shall be entitled to recover from

the other reasonable attorney's fees and costs, including expert witness' costs, expended by the prevailing party in connection with such action.

**12. Notices.**

Any and all notices, invoices, requests, demands, and communications provided for by this Agreement shall be in writing and shall be effective when delivered in person, sent by facsimile with confirmation, sent via email with confirmation, or upon receipt via U.S. Postal Service postage prepaid, with return receipt requested, as follows:

To CyFIR:  
CyFIR, Inc.  
Attn: Ben Cotton  
Founder  
20130 Lakeview Center Plaza  
Suite 120  
Ashburn, VA 20147  
703.936.1470  
ben.cotton@cyfir.com

To Client:

Attn: \_\_\_\_\_

Phone: \_\_\_\_\_

Fax: \_\_\_\_\_

Email: mldeperno@protonmail.com

**13. General.**

This Agreement shall not be revised except by written agreement executed by both Client and CyFIR. This shall include such revisions as may be made via email or fax. Subject to the restrictions on assignment contained herein, this agreement shall be binding upon Client's restrictions heirs, executors, administrator, or other legal representatives, successors, and assigns.

If any provision of this agreement is voided, unenforceable, or not enforced, this Agreement shall be considered divisible as to such provision, and the remainder of the Agreement shall be valid and binding as if such provision were not included in it.

Failure of either party to insist upon strict performance of any provision of this Agreement or to exercise any option, right, remedy or power contained in this Agreement will not constitute a waiver or relinquishment thereof for the future.

IN WITNESS WHEREOF, the parties have entered into this Agreement as of the date indicated herein.

CyFIR, LLC.:

CyFIR, Inc.

Ben Cotton

Founder

Date: 3/21/21 / 3/19/21

Signature: [Signature]

Client: Law Office of Stefanick Lambert PLLC

[Signature]

Name: Stefanick Lambert, III

Title: Attorney

Date: March 21, 2021

Signature: [Signature]

This engagement letter dated 7/3/2021 is between the Law Office of Stefanie L. Lambert, PLLC, "Firm", and CyFir, 20130 Lakeview Center Plaza, Suite 120, Ashburn, VA 20147, "Company" for the following services including but not limited to:

- Forensics analysis of evidence
- Expert reports and testimony

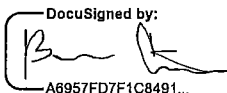
This engagement includes, but is not limited to, a specific requirement to comply with the non-disclosure agreement (attached) with the Firm related the evidence obtained by SullivanStrickler from Coffee County, Georgia and the forensics analysis reports, information, data, and any other attorney client privileged information from the Company performed on behalf of the Firm on that same data.

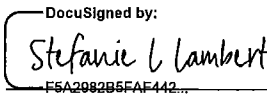
No results from work directed by the Firm shall be released to any other party without the express written consent of the firm via email.

This agreement does not supersede previous agreements and all other agreements remain in full force and effect with the Firm.

Fees:

The Firm will compensate the Company for work performed.

DocuSigned by:  
  
A8957FD7F1C8491...  
Name: Benjamin Cotton  
Title: Founder  
Date: 7/3/2021

DocuSigned by:  
  
F5A2982B5FAF442...  
Name: Stefanie L. Lambert, PLLC  
Date: 7/3/2021



## NON-DISCLOSURE AGREEMENT

This Non-Disclosure Agreement (the “Agreement”) is entered into by and between the Law Office of Stefanie L. Lambert, PLLC (the “Disclosing Party”) and Benjamin Cotton & CYFIR (the “Receiving Party”) collectively referred to as the “parties” for the purpose of preventing the unauthorized disclosure of Confidential Information as defined below.

### 1. Definition of Confidential Information

For purposes of this Agreement, “Confidential Information” shall include any and all information or material that is shared orally or otherwise between the parties pertaining to election fraud, election irregularities, election information, election data, election evidence, digital or otherwise, witness information, trial preparation and strategy, and any and all confidential information pertaining to the November 3, 2020 elections, including but not limited to, all federal, state, regional and local elections that took place within the United States of America on November 3, 2020 in all cities, townships, municipalities, counties, and states within the United States of America.

### 2. Exclusions from Confidential Information

Receiving Party’s obligations under this Agreement do not extend to information that is: (a) publicly known at the time of disclosure or subsequently becomes publicly known through no fault of the Receiving Party; (b) discovered or created by the Receiving Party before disclosure by Disclosing Party; (c) learned by the Receiving Party through legitimate means other than from the Disclosing Party or Disclosing Party’s representatives; or (d) is disclosed by Receiving Party with Disclosing Party’s prior written approval.

### 3. Obligations of Receiving Party

Receiving Party shall hold and maintain the Confidential Information in strictest confidence for the sole and exclusive benefit of the Disclosing Party. Receiving Party shall carefully restrict access to Confidential Information to employees, contractors and third parties as is reasonably required and shall require those persons to sign nondisclosure restrictions at least as protective as those in this Agreement. Receiving Party shall not, without the prior written approval of Disclosing Party, use for Receiving Party’s own benefit, publish, copy, or otherwise disclose to others, or permit the use by others for their benefit or to the detriment of Disclosing Party, any Confidential Information. Receiving Party shall return to Disclosing Party any and all records, notes, and other written, printed, or tangible

materials in its possession pertaining to Confidential Information immediately if Disclosing Party requests, it in writing. All confidential information is to be considered the exclusive work product of Stefanie L. Lambert, PLLC.

#### **4. Time Periods**

This Agreement and Receiving Party's duty to hold Confidential Information in confidence shall remain in effect indefinitely unless Disclosing Parties provide written approval to share portions of confidential information or until whichever of the following occurs first: (a) Disclosing Party sends Receiving Party written notice releasing it from this Agreement, or (b) Confidential Information disclosed under this Agreement ceases to be confidential.

#### **5. Relationships**

Nothing contained in this Agreement shall be deemed to constitute either party a partner, joint venturer or employee of the other party for any purpose.

- **Severability**

If a court finds any provision of this Agreement invalid or unenforceable, the remainder of this Agreement shall be interpreted so as best to effect the intent of the parties.

#### **7. Integration**

This Agreement expresses the complete understanding of the parties with respect to the subject matter and supersedes all prior proposals, agreements, representations, and understandings. This Agreement may not be amended except in a writing signed by both parties.

#### **8. Waiver**

The failure to exercise any right provided in this Agreement shall not be a waiver of prior or subsequent rights.

#### **9. Injunctive Relief**

Any misappropriation of Confidential Information in violation of this Agreement may cause Disclosing Party irreparable harm, the amount of which may be difficult to ascertain, and therefore Receiving Party agrees that Disclosing Party shall have the right to apply to a court of competent jurisdiction for an order enjoining any such further misappropriation and for such other relief as Disclosing

Party deems appropriate. This right of Disclosing Party is to be in addition to the remedies otherwise available to Disclosing Party.

### **10. Indemnity**

Receiving Party agrees to indemnify Disclosing Party against any and all losses, damages, claims or expenses incurred or suffered by Disclosing Party as a result of Receiving Party's breach of this Agreement.

### **11. Attorney Fees and Expenses**

In a dispute arising out of or related to this Agreement, the prevailing party shall have the right to collect from the other party its reasonable attorney fees and costs and necessary expenditures.

### **12. Governing Law**

This Agreement shall be governed in accordance with the laws of the State of Michigan.

### **13. Successor and Assigns**

This Agreement and each party's obligations shall be binding on their representatives, assigns and successors of such party.

DocuSigned by:



F5A2982B5FAF442...

Stefanie L. Lambert, PLLC  
7/3/2021

DocuSigned by:



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Benjamin Cotton

Founder  
7/3/2021

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1/7/21, 7:24 PM

+1 [REDACTED]

Let's switch to Signal <https://signal.org/install>

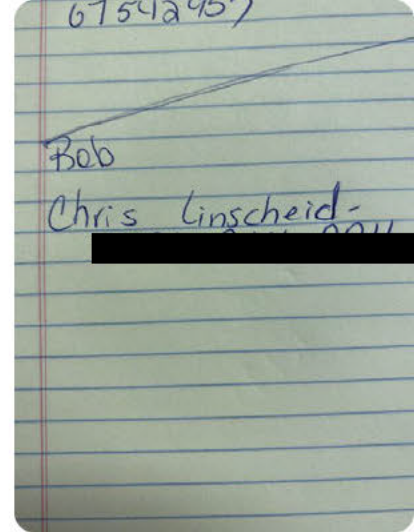
1/8/21, 11:52 AM

Did you check signal?

Call you in just a minute

Tag

1/12/21, 2:56 PM



1/15/21, 5:08 PM

Do you have snap chat? Signal is down!

1/19/21, 10:35 AM

If you happen to be in town, the guys measuring my desk are still here

1/20/21, 6:47 PM

Do you have a high capacity scanner in your office?

1/22/21, 1:53 PM

Are you at your office

1/25/21, 7:31 PM

You busy

1/27/21, 9:23 AM

I took care of the people measuring my desk

2/5/21, 5:51 PM

I am looking for a dependable car with a low payment

2/9/21, 2:30 PM

Do you still have the 2007 Nissan Armada

2/9/21, 5:20 PM

[https://www.bitchute.com/video/17ZUoNxKWACb/?fbclid=IwAR0kUYA\\_2y9kKYIQkqTkn-8Ah7kow1C3RGrkitWbC3GCWRmLkGksNX6RrXo](https://www.bitchute.com/video/17ZUoNxKWACb/?fbclid=IwAR0kUYA_2y9kKYIQkqTkn-8Ah7kow1C3RGrkitWbC3GCWRmLkGksNX6RrXo)

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**Secretary of State**  
**EVIDENCE CHAIN OF CUSTODY TRACKING FORM**

Case Number: \_\_\_\_\_ Case Name: \_\_\_\_\_  
 Submitting Investigator name/ID#) \_\_\_\_\_  
 Complainant: \_\_\_\_\_  
 Respondent: \_\_\_\_\_  
 Date/Time Seized: \_\_\_\_\_ Location of Seizure: \_\_\_\_\_

Description of Evidence		
Item #	Quantity	Description of Item (Model, Serial #, Condition, Marks, Scratches)
1	1	Coffee County Election Management System CPU  Service Tag: BRKP513 Express Svc Code: 25611957687 GA Voting System Acceptance Test: 074610 Mfg. Date: 20191129 Model: DELL Precision 3431
2	1	Coffee County ImageCast Central (ICC) Workstation  Service Tag: C53RH03 Express Svc Code: 26430039507 Order #: 539723410 GA Voting System Acceptance Test: 081046 Model: DELL OptiPlex 3050 AIO





Chain of Custody				
Item #	Date/Time	Released by (Signature & ID#)	Received by (Signature & ID#)	Comments/Location
1	7/1/2022	Michael Barnes	J. R. SINGH	
1	7/1/2022			
2	7/1/2022	Michael Barnes	J. R. SINGH	
2	7/1/2022			

Exhibit 22 filed  
under seal

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System Number of events: 28,939

Level	Date and Time	Source	Event ID	Task Category
Error	11/5/2020 10:56:24	DistributedC...	10016	None
Information	11/5/2020 10:47:32	Kernel-General	1 (5)	
Information	11/5/2020 10:47:32	Kernel-General	1 (5)	
Information	11/5/2020 10:47:32	TerminalServ...	1056	None
Error	1/19/2021 10:40:38	DistributedC...	10016	None
Error	1/19/2021 10:36:54	DistributedC...	10016	None
Error	1/19/2021 10:33:05	DistributedC...	10016	None

Event 1, Kernel-General







General Details

The system time has changed to 2020-11-05T15:47:32.546000000Z from 2021-01-19T15:47:44.810291800Z.

Change Reason: An application or system component changed the time.

Log Name: System  
Source: Kernel-General      Logged: 11/5/2020 10:47:32  
Event ID: 1      Task Category: (5)  
Level: Information      Keywords: Time  
User: EMSSERVER\emsadmin      Computer: EMSSERVER  
OpCode: Info  
More Information: [Event Log Online Help](#)

System\_3 Number of events: 2,331

Level	Date and Time	Source	Event ID	Task Category
 Information	11/5/2020 10:45:32 AM	Kernel-General	16	None
 Information	11/5/2020 10:42:05 AM	Kernel-General	1	None
 Information	11/5/2020 10:42:05 AM	Kernel-General	1	None
 Information	1/19/2021 9:54:10 AM	Kernel-General	16	None
 Information	1/19/2021 9:54:06 AM	Kernel-General	16	None
 Information	1/18/2021 7:11:01 PM	Kernel-General	16	None

Event 1, Kernel-General









General Details

The system time has changed to 2020-11-05T15:42:05.479000000Z from 2021-01-19T15:44:16.464984100Z.  
Change Reason: An application or system component changed the time.

Log Name: System  
Source: Kernel-General      Logged: 11/5/2020 10:42:05 AM  
Event ID: 1      Task Category: None  
Level: Information      Keywords: Time  
User: S-1-5-21-2734351248-280577      Computer: ICC01  
OpCode: Info  
More Information: [Event Log Online Help](#)

System\_3 Number of events: 2,331

Level	Date and Time	Source	Event ID	Task Category
 Information	11/3/2020 8:26:00 AM	Kernel-General	16	None
 Information	11/3/2020 8:25:34 AM	Kernel-General	1	None
 Information	11/3/2020 8:25:34 AM	Kernel-General	1	None
 Information	11/11/2020 12:00:00 PM	EventLog	6013	None
 Information	11/10/2020 12:00:00 PM	EventLog	6013	None
 Information	11/9/2020 12:00:00 PM	EventLog	6013	None







Event 1, Kernel-General ✕

General Details

The system time has changed to 2020-11-03T13:25:34.134000000Z from 2020-11-11T21:25:46.884460900Z.  
Change Reason: An application or system component changed the time.

Log Name: System  
Source: Kernel-General      Logged: 11/3/2020 8:25:34 AM  
Event ID: 1      Task Category: None  
Level: Information      Keywords: Time  
User: S-1-5-21-2734351248-280577      Computer: ICC01  
OpCode: Info  
More Information: [Event Log Online Help](#)

System\_3 Number of events: 2,331

Level	Date and Time	Source	Event ID	Task Category
 Information	11/5/2020 9:13:22 AM	Kernel-General	16	None
 Information	11/5/2020 9:01:22 AM	Kernel-General	1	None
 Information	11/5/2020 9:01:22 AM	Kernel-General	1	None
 Information	11/5/2020 9:01:22 AM	EventLog	6013	None
 Information	11/3/2020 8:31:34 AM	Kernel-General	16	None
 Information	11/3/2020 8:31:34 AM	Kernel-General	16	None

Event 1, Kernel-General



General Details

The system time has changed to 2020-11-05T14:01:22.988000000Z from 2020-11-03T14:01:27.184190800Z.  
Change Reason: An application or system component changed the time.

Log Name: System  
Source: Kernel-General      Logged: 11/5/2020 9:01:22 AM  
Event ID: 1      Task Category: None  
Level: Information      Keywords: Time  
User: S-1-5-21-2734351248-280577      Computer: ICC01  
OpCode: Info  
More Information: [Event Log Online Help](#)

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Pierce County

Records Request

Date: February 4, 2021  
To: Leah Rich, Elections Supervisor  
312 Nichols St, Suite 2  
Blackshear, GA 31516

From: Jeff Lenberg, [REDACTED]

Subject: Open Records Request for Coffee County 2020 Election Related Data

My name is Jeff Lenberg, contact number is [REDACTED]  
I am doing independent research to help verify the accuracy of the 2020 General Election.

Please provide me with the following election related information for Pierce County:

1. A photo copy of the top part of the Paper Results Tape for each ICP tabulator used to tabulator ballots for the November 3<sup>rd</sup>, 2020 election. It need only be the top part that contains the machine/precinct related information and all of the federal races (President, 2 x Senators, Congressman).
2. All batch sheets used as part of the full hand recount of the November 3<sup>rd</sup> election that were entered into the ARLO software system to upload to the state.
3. All tally sheets that listed the batch sheets that were generated during the full hand recount for the November 3<sup>rd</sup> election.

If you could photocopy all of the documents and email them to me that would be very much appreciated.

Please notify me if there is any required payment for the production of these materials so that I can arrange for payment.  
Thank you for your assistance.



Date: January 27, 2021

To: Tracie Vickers, County Clerk  
101 South Peterson Ave.  
Douglas, GA 31533

From: Jeff Lenberg, [REDACTED]

Subject: Open Records Request for Coffee County 2020 Election Related Data

My name is Jeff Lenberg, contact number is [REDACTED]  
I am doing independent research to help verify the accuracy of the 2020 General Election.

Please provide me with the following election related information for Coffee County:

1. A photo copy of the top part of the Paper Results Tape for each ICP tabulator used to tabulator ballots for the November 3<sup>rd</sup>, 2020 election. It need only be the top part that contains the machine/precinct related information and all of the federal races (President, 2 x Senators, Congressman).
2. All batch sheets used as part of the full hand recount of the November 3<sup>rd</sup> election that were entered into the ARLO software system to upload to the state.
3. All tally sheets that listed the batch sheets that were generated during the full hand recount for the November 3<sup>rd</sup> election.

A thumb drive will be provided to the Coffee County election office so that paper copies will not be required. Photocopies loaded on to a thumb drive will be sufficient. Once available the thumb drive will be retrieved from the Coffee County Elections Office. If a signature is required, it can be provided at that time.

Please notify me if there is any required payment for the production of these materials.  
Thank you for your assistance.

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Message # 18

Message Key: 000007E5BDF122E7A1FA00E612B1D7C096E951FB400B898B9F204B2EFE5DF174F4AD29EA  
From: "Vickers, Tracie" <Tracie.Vickers@coffeecounty-ga.gov>  
To: Misty Hampton <misty.hampton@coffeecounty-ga.gov>  
Addressed To: misty.hampton@coffeecounty-ga.gov  
Subject: RE: Open Records Request  
Date: Thursday, February 04, 2021 18:24 UTC



What date did he pick it up so I can close out my file on it?

From: Misty Hampton <misty.hampton@coffeecounty-ga.gov>  
Sent: Thursday, February 4, 2021 1:19 PM  
To: Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>  
Subject: RE: Open Records Request

The information on the thumb drive was a copy of the top part of the ICP tape, the batch sheets from the hand recount and the tally sheet from the hand recount. Yes I ALWAYS keep a copy of what goes out for an ORR.

Misty Martin  
Election Supervisor  
Coffee County Board of Elections  
224 West Ashley St  
Douglas, Ga. 31533  
912-384-7018 - Office  
912-393-7181 - Direct  
misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>

From: Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov<mailto:Tracie.Vickers@coffeecounty-ga.gov>>  
Sent: Thursday, February 4, 2021 1:16 PM  
To: Misty Hampton <misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>>  
Subject: RE: Open Records Request

Can you please provide me with an email concerning the data that you gave him and the date it was given to him or mailed to him. Did you keep a copy for our files ?

From: Misty Hampton <misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>>  
Sent: Thursday, February 4, 2021 1:11 PM  
To: Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov<mailto:Tracie.Vickers@coffeecounty-ga.gov>>  
Subject: RE: Open Records Request

Yes, it is complete. He gave me a thumb drive and I put it on the thumb drive.

Misty Martin  
Election Supervisor  
Coffee County Board of Elections  
224 West Ashley St  
Douglas, Ga. 31533  
912-384-7018 - Office  
912-393-7181 - Direct  
misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>

From: Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov<mailto:Tracie.Vickers@coffeecounty-ga.gov>>  
Sent: Thursday, February 4, 2021 1:05 PM  
To: Misty Hampton <misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>>  
Subject: FW: Open Records Request

Misty, Is this complete? Please send me the response so I can close this out. It was sent on February 2

From: Vickers, Tracie  
Sent: Tuesday, February 2, 2021 5:18 PM  
To: Misty Hampton <misty.hampton@coffeecounty-ga.gov<mailto:misty.hampton@coffeecounty-ga.gov>>

Subject: FW: Open Records Request

Misty, Is this complete ?

From: Jeffrey Lenberg <JLenberg@lenbergconsulting.com<mailto:JLenberg@lenbergconsulting.com>>

Sent: Wednesday, January 27, 2021 9:12 PM

To: openrecordsrequest <openrecordsrequest@coffeecounty-ga.gov<mailto:openrecordsrequest@coffeecounty-ga.gov>>

Subject: Open Records Request

Hello,

I have attached an Opens Record Request for some information related to the November 3rd general election. Please see the attached file.

----- End Of Message -----

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## OFFICIAL ELECTION BULLETIN

November 17, 2020

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**TO: County Election Officials and County Registrars**  
**FROM: Chris Harvey, Elections Division Director**  
**RE: Open Records Requests – Security Information Exempt**

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Multiple counties have reported receiving Open Records Requests asking for data information such as, copies of original software for the voting equipment, copies of any software patches performed on Dominion voting machines in the State of Georgia prior to the November 3, 2020 General Election, as well as copies of any thumb drives provided to you containing software or software updates.

Several counties have also received Open Records Requests for the information contained in the log files of the KNOWiNK poll books. The information stored in the log files may not be produced, as it contains information that is protected under the Georgia Trade Secrets Act of 1990 and the Open Records Act.

Parties that have an interest in or are involved in active litigation with the State regarding the security of the voting system might have made some of these requests. Even so, you are still required to respond to the requests if they have been properly submitted. However, you are expected to only produce what is permitted under the Open Records Act O.C.G.A. § 50-18-72 and you may not produce any sensitive data that could harm election security.

Under the Open Records Act, providing copies of software, software updates, or thumb drives containing software or software updates is not subject to open records requests. In addition, information that could harm the security of election equipment cannot be provided. See O.C.G.A. § 50-18-72(25).

Additionally, O.C.G.A. §21-2-379.24(g) indicates that "documents or information that, if made public, would endanger the security of any voting system used or being considered for use in this state, or any component thereof, including, but not limited to, electronic ballot markers, DREs, ballot scanners, pollbooks, and software or data bases used for voter registration, shall not be open for public inspection except upon order of a court of competent jurisdiction."

If you have any questions about how to respond to any open requests that you receive, please contact your county attorney or your board of elections for advice. For additional questions, you may also contact the Secretary of State's Office.

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May 6, 2021

## Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System

Dominion has been alerted that customers are being approached with offers or requests to conduct a “forensic audit” of their voting equipment. It is critically important that only authorized, legal users be granted access to voting equipment in order to maintain secure chain of custody for your system. Please use this guidance to help you maintain the security and integrity of your voting system.

- Your Dominion voting system is installed in full compliance with federal and/or state certification requirements, with associated test reports from a federally accredited [Voting System Test Lab](#) (“VSTL”). In addition to undergoing U.S. Election Assistance Commission (EAC) certification, VSTL testing, state certification (as applicable by law), installation of the “trusted build” of approved software with hash calculations for security checks, the system is placed into a jurisdiction’s custody where it must be protected/physically secured. If chain of custody is breached and the certification status of your equipment cannot be guaranteed, it may be rendered unqualified for official use.
- Your Dominion software-licensing agreement also provides important written guidance on permissions for who can legally access the system with the company’s consent. Any unauthorized transfer of voting equipment to unaccredited, non-certified vendors can void this agreement and create financial impacts for your jurisdiction. While Dominion does not object to audits by federally accredited Voting System Test Labs (“VSTLs”), the agreement does not allow for the release of voting systems to unaccredited, non-certified third parties without prior written consent.<sup>1</sup>
- Should you feel the need to conduct further examination of your voting equipment for any reason, please feel free to consult with your legal advisors and Dominion about the appropriate options that are available. Your Secretary of State or State Elections Board can advise you on legal guidelines for the proper testing, use, and auditing of voting systems and elections processes. You can also find online guidance on [post-election audits](#) from the U.S. Election Assistance Commission (EAC).
- Remember, your voting system is deemed critical infrastructure by the U.S. government and should be utilized, maintained, and protected as such. Chain of custody breaches may require a separate forensic audit and software reinstallation by an accredited lab with experts trained to work with voting system technology according to industry best practices for auditing and security.

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**CONTACT US:** If you have recently been approached by individuals offering their services for a “forensic audit” of your voting system, or if you have accepted a “forensic audit” of your voting system by a third party and have chain of custody concerns, please report this activity to: [security@dominionvoting.com](mailto:security@dominionvoting.com).

**GET THE FACTS:** Thousands of fair and impartial recounts and audits conducted since the November 2020 election have confirmed the accuracy and reliability of Dominion voting systems. Paper ballot records also provide a failsafe for checking accuracy of machine vote totals.

**MORE:** [www.dominionvoting.com](http://www.dominionvoting.com). **THANK YOU** for your support!

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<sup>1</sup> Some state election auditing programs also have similar restrictions for maintaining chain of custody protections.



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