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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
11/13/2024
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

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7 *Attorneys for Jack Poulson*

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF SAN FRANCISCO**

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11 JOHN DOE, an individual,
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Plaintiff,

Case No.: CGC-24-618681

**DECLARATION OF JACK POULSON IN
SUPPORT OF DEFENDANTS JACK
POULSON’S AND TECH INQUIRY’S
OPPOSITION TO PLAINTIFF’S MOTION
FOR TEMPORARY RESTRAINING
ORDER**

v.

SUBSTACK, INC., a Delaware
Corporation; AMAZON WEB
SERVICES, INC., a Delaware
Corporation; JACK POULSON, an
individual; TECH INQUIRY, INC., a
Delaware corporation;
DOES 1-25, inclusive,
Defendants.

DATE: November 13, 2024
TIME: 11:00 a.m.
DEPT: 302

Judge: Richard B. Ulmer, Jr.
Action Filed: October 3, 2024
Trial Date:

DECLARATION OF JACK POULSON

I, JACK POULSON, declare as follows:

1. I am an independent journalist focused on the intersection of technology and national security. I currently write primarily through my newsletter published through Substack. I began the newsletter in April 2023. The newsletter currently has more than 2,900 subscribers. I publish approximately once per week. The newsletter can

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2. I am also the executive director and founder of Tech Inquiry, which investigates the intersection of surveillance and weapons companies with governments. I founded Tech Inquiry in 2019. Tech Inquiry is an independent legal entity. I write the newsletter described in the preceding paragraph in my personal capacity and not as an officer of Tech Inquiry.
3. Prior to starting Tech Inquiry and my newsletter, I was a senior research scientist at Google Research. Prior to that I was an Assistant Professor of Mathematics at Stanford University and an Assistant Professor of Computational Science and Engineering at Georgia Tech.
4. In my newsletter, I have frequently reported on the connectedness of companies making surveillance and weapons technologies and the governments that contract with them. Among these companies is the one of which plaintiff Doe was formerly the chief executive officer. I wrote about this company because of its role as a human intelligence provider for U.S. Special Operations Command. This company has been the subject of seven articles in my newsletters.
5. I received the Incident Report that is the subject of this matter unsolicited from a confidential source. I did not request or otherwise seek out the Incident Report.
6. I was unaware that the Incident Report was sealed when I received it and wrote about it. There was no marking on the Incident Report that I understood to indicate it had been sealed. Upon receipt of the Incident Report, I communicated with the San Francisco Police Department to verify the authenticity of the Incident Report. The SFPD verified that the Incident Report was authentic that its contents were accurate. The SFPD did not inform me that the Incident Report had been sealed.

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7. I am currently in Lisbon, Portugal where I am speaking at a conference. I am nine hours ahead of Pacific Standard Time and have only intermittent internet access. The emergency nature of this proceeding without prior notice before November 12 has made it very difficult for me to fully participate in the preparation of the opposition papers.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 13 day of November 2024 in Lisbon, Portugal.



Jack Poulson