

EXHIBIT 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

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

Civil Action No. 1:17-cv-02989-AT

DONNA CURLING, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF DEAN M. FELICETTI

DATE: September 2, 2022

TIME: 9:12 a.m. to 4:28 p.m.

LOCATION: Witness location

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions
1250 Eye Street, N.W., Suite 350
Washington, D.C. 20005

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

A P P E A R A N C E S

On behalf of the Witness:

ERIC B. COLEMAN, ESQUIRE
Winter Capriola Zenner, LLC
3490 Piedmont Road, Northeast, Ste 800
Atlanta, Georgia 30305
ecoleman@wczlaw.com

-- and --

AMANDA CLARK-PALMER, ESQUIRE
Garland Samuel and Loeb
3151 Maple Drive, Northeast
Atlanta, Georgia 30305
aclark@gsllaw.com

On behalf of the Curling Plaintiffs:

MARY KAISER, ESQUIRE (Via Zoom)
DAVID D. CROSS, ESQUIRE
JENNA CONAWAY (Via Zoom)
WAIL JIHADI (Via Zoom)
Morrison & Foerster LLP
2100 L Street, Northwest
Suite 900
Washington, D.C. 20037

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

A P P E A R A N C E S (Cont'd)

mkaiser@mofo.com

dcross@mofo.com

On behalf of the Curling Plaintiffs:

ADAM SPARKS, ESQUIRE

Krevolin & Horst, LLC

1201 West Peachtree, Northwest, Suite 3250

Atlanta, Georgia 30309

sparks@khlawfirm.com

On behalf of the Coalition for Good Governance
Plaintiffs:

BRUCE P. BROWN, ESQUIRE

Bruce P. Brown Law

1123 Zonolite Road, Northeast

Suite 6

Atlanta, Georgia 30306

bbrown@brucepbrownlaw.com

-- and --

MARILYN MARKS, ESQUIRE (Via Zoom)

7035 Marching Duck Drive, E504

Charlotte, North Carolina 28210

Marilyn@uscgg.org

1 A P P E A R A N C E S (Cont'd)

2 On behalf of the State Defendants:

3 CAREY MILLER, ESQUIRE (Via Zoom)

4 VINCENT R. RUSSO, ESQUIRE

5 Robbins Firm

6 500 14th Street, Northwest

7 Atlanta, Georgia 30318

8 carey.miller@robbinsfirm.com

9 vincent.russo@robbinsfirm.com

10 Also Present: (Via Zoom)

11 Donna Curling

12 Ernestine Thomas-Clark

13 Kevin Skoglund

14 Oluwasegun Joseph

15 Diane LaRoss

16 J. Alex Halderman

17 Donna Price

18 Susan Greenhalgh

19 Richard A. DeMillo

20 Veronica Ascarrunz

21 Duncan Buell

22 Philip B. Stark

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

C O N T E N T S

EXAMINATION BY:	PAGE
Counsel for Curling Plaintiffs	9
Counsel for Coalition Plaintiffs	310
Counsel for State Defendants	321
Counsel for Curling Plaintiffs	331

FELICETTI DEPOSITION EXHIBITS

NO.	DESCRIPTION	PAGE
1	SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION	15
2	Picture of Jim Nelson, Senior System Engineer at SullivanStrickler LLC	25
3	Picture of Jennifer Jackson, Senior System Engineer at SullivanStrickler LLC	26
4	Picture of Karuna Naik, Senior System Engineer at SullivanStrickler LLC	29
5	Picture of Paul Maggio, Senior System Engineer at SullivanStrickler LLC	30
6	Engagement Agreement, November 30, 2020	49
7	Engagement Agreement, MI AZ, December 6, 2020	78
8	January 8, 2021 Maggio e-mail chain	81

1		invoice	
2	9	Phone text message, 8/12/2022	113
3	10	Coffee County Board of Elections and	121
4		Registration Elections Office Security	
5		Video, January 7, 2021	
6	11	January 8, 2021 From 5pm to 6pm missing	138
7		video	
8	12	Bates Numbers 08122022 000236 to 265	142
9	13	Password Memos, 08122022-000123 through	183
10		125	
11	14	Maggio hard drive contents (screenshots)	197
12	15	8/17/2022 Maggio Production (Triage	203
13		reports) Folder Structure	
14	16	Bates Numbers 08122022-000126 through	236
15		136	
16	17	Bates Numbers 08122022-000137 through	241
17		161	
18	18	Bates Numbers 08122022-000175 through	246
19		176	
20	19	Bates Numbers 08122022-000098 through	251
21		105	
22	20	Bates Numbers 08122022-000204 through	254

1	205	
2	21	Excel Attachment, 08122022-000205.XLSX 254
3	22	Bates Numbers 08122022-000022 through 33 257
4	23	Maggio-000057 58 Excel 260
5	24	May 7, 2021 Barnes e-mail chain re: 266
6		Cyber Ninjas
7	25	Subpoena 273
8	26	STATE-DEFENDANTS-001 01937 276
9	27	ICS Advisory (ICSA-22-154-01) 280
10		Vulnerabilities Affecting Dominion
11		Voting Systems ImageCast X
12	28	Copy of Check to Defending the Republic 296

13

14 *(Exhibits attached to transcript.)

15

16

17

18

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

P R O C E E D I N G S

* * * * *

VIDEOGRAPHER: Today's date is
September 2, 2022, and we are on the record at
9:12 a.m. This will be the videotaped 30(b)(6)
deposition of SullivanStrickler, LLC, given by Dean
Michael Felicetti.

Would counsel present please
identify themselves for the record.

MR. CROSS: David Cross,
Morrison & Foerster for the Curling Plaintiffs.
And with me is my colleague, Adam Sparks.

MR. BROWN: Bruce Brown for the
Coalition Plaintiffs.

MR. COLEMAN: Eric Coleman on behalf
of SullivanStrickler.

MS. CLARK-PALMER: Amanda
Clark-Palmer on behalf of SullivanStrickler.

MR. RUSSO: Vincent Russo, Robbins
Firm, on behalf of the State Defendants.

MS. LAROSS: Diane LaRoss from Taylor
English, also on behalf of the State Defendants.

1 VIDEOPHOTOGRAPHER: Thank you.

2 Will the court reporter please
3 swear in our witness?

4 * * * * *

5 Whereupon,

6 DEAN MICHAEL FELICETTI

7 was called as a witness and, having been first duly
8 sworn, was examined and testified as follows:

9 EXAMINATION BY COUNSEL FOR CURLING PLAINTIFFS

10 BY MR. CROSS:

11 Q Good morning.

12 A Good morning.

13 Q Can you state your -- oh, grab your
14 mic.

15 A Oh, my bad.

16 Q That's all right. I did the same
17 thing.

18 MS. CLARK-PALMER: Do you want it on
19 your lapel or the tie?

20 MR. CROSS: The tie is probably best.
21 Are you getting him okay?

22 THE WITNESS: Am I good?

1 BY MR. CROSS:

2 Q Good morning.

3 A Hi.

4 Q Can you just state your full name and
5 address?

6 A Sure. Dean Michael Felicetti,

7 

8 Q So you are not local?

9 A No.

10 Q Okay.

11 A No.

12 Q And you're employed by the
13 SullivanStrickler firm?

14 A Yes.

15 Q Have you been there since 2017?

16 A No.

17 Q How long have you been there?

18 A Two years August.

19 Q Okay. Where were you before that?

20 A I was a partner in a company called
21 the Oliver Group.

22 Q And what are your responsibilities at

1 SullivanStrickler?

2 A I work closely with several clients
3 from a client relationship standpoint, as well as
4 information governance and data risk assessments,
5 and sales component as well.

6 Q Has that been your role since you
7 joined about two years ago?

8 A Yes.

9 Q Is there an office in Rhode Island or
10 do you work remotely?

11 A I work remotely.

12 Q So you're the only -- the only
13 employee in Rhode Island?

14 A Yes.

15 Q Is the firm based in Atlanta?

16 A Yes.

17 Q Are there any other offices?

18 A Yes.

19 Q Where?

20 A Austin, Texas and London, England.

21 Q Okay. What is your educational
22 background?

1 A I -- from a university standpoint, I
2 have an applied, an AAS, associates in computer
3 science. And professional, I hold a certification
4 in Information Governance Officer. So it's a CO,
5 it's called.

6 Q Where is your undergraduate degree
7 from?

8 A AA -- it's SUNY Adirondack.

9 Q Got it.

10 A Yeah.

11 Q Is that a BA or a BS or what is it?

12 A Associates.

13 Q Associates degree?

14 A Yes.

15 Q Got it. Okay.

16 In computer science?

17 A Yes.

18 Q Okay. You said the job before
19 SullivanStrickler, that was the Oliver Group?

20 A Yes. Which we were acquired by a
21 company called RVM, but I still facilitated the
22 role as a partner in the Oliver Group, but also as

1 the director of information governance for RVM.

2 Q Did you have a -- did you work
3 somewhere before the Oliver Group?

4 A I did. I was the chief technology
5 officer for an e-Discovery company called Ibis
6 Consulting.

7 Q What was your role there?

8 A Technology, software development,
9 management, client relations, growth of technology,
10 and technology vision.

11 Q Okay. Did you have a job before
12 that?

13 A I did. '92, this was out of college,
14 I was a computer operator at Foxwoods Casino in
15 Connecticut, in the IT department.

16 Q That must have been fun.

17 A Yeah, it was a lot of work, a lot of
18 hours, and it was enjoyable. It was paid
19 education. It was right out of college, so I was
20 lucky.

21 Q At some point off the record you can
22 tell us all --

1 A Oh --

2 Q -- the secrets of the casino.

3 A Of course. Of course.

4 Q Was that your first job out of
5 college?

6 A First career job, yes.

7 Q Okay. And did you graduate -- you
8 got your associates degree, you said, in '92?

9 A It was.

10 Q And you also coach basketball?

11 A I do. I'm a high school basketball
12 coach, going on 13, 14 years now, I think.

13 Q Nice.

14 A I love it.

15 Q Okay. So do you understand that
16 you're testifying today on behalf of
17 SullivanStrickler as a corporate representative?

18 A Yes, sir.

19 Q And just yes or no; has -- has -- I
20 assume someone has explained to you what that
21 means?

22 A Yes.

1 Q All right. Let me show you the first
2 exhibit.

3 A Sure.

4 (Felicetti Deposition Exhibit Number 1
5 marked for identification.)

6 MR. CROSS: Sorry, we only have
7 limited copies.

8 MR. RUSSO: That's okay.

9 MR. CROSS: The Exhibit Share, for
10 everyone, if you're logged in, it's all going to go
11 up there.

12 BY MR. CROSS:

13 Q Have you seen Exhibit 1 before?

14 A Yes.

15 Q Okay. And this is a copy of the
16 subpoena that we served on SullivanStrickler for
17 today's deposition. Do you understand that?

18 A Yes.

19 Q And you're saying you're appearing
20 pursuant to the subpoena?

21 A Yes.

22 Q Okay. If you flip to page 5 of the

1 attachment, you'll see a heading "Topics."

2 A Yeah.

3 Q And then the topics go through
4 page 8, 17 topics. Do you see that?

5 A Yes.

6 Q And are you prepared to testify on
7 those topics for SullivanStrickler today?

8 A Yes.

9 Q Okay. And I should have asked you at
10 the start. Is there any reason today that you
11 cannot give full and truthful testimony?

12 A No. I --

13 Q Okay. You're not on any medication?
14 You're not intoxicated?

15 A No.

16 Q Okay.

17 A Oh, no. No.

18 Q All right. Thank you.

19 A You're welcome.

20 Q All right. Just walk me through what
21 you did to prepare for today's deposition.

22 And to be clear, I don't -- I don't

1 want to get into any substance of communications
2 with counsel.

3 A Sure.

4 Q So just walk me through what you did
5 to prepare yourself on the -- on the topics.

6 A Reviewed documentation, reviewed the
7 subpoena. I spoke with the team members that were
8 part of the services provided to get a sense of
9 timeline, technologies utilized, areas around the
10 topics identified in the subpoena.

11 Q Okay. What documents did you review
12 for today?

13 A I -- I reviewed the production
14 documents that were produced to, I guess, all
15 parties.

16 Q The documents that were produced in
17 response to a subpoena we served on Paul Maggio?

18 A Yes.

19 Q Okay. Did you review all of those
20 documents or just a subset?

21 A I reviewed all of the documents.

22 Q Does that include photos, for

1 example?

2 A Yes.

3 Q And there was a hard drive that was
4 also produced by Mr. Maggio. Were you aware of
5 that?

6 A Produced how?

7 Q It was a literal hard drive that had
8 files and data on it.

9 A Produced?

10 Q To us.

11 A Oh, no.

12 Q Okay. Were you aware before now that
13 there was a hard drive that was produced by
14 Mr. Maggio?

15 A I know there was a hard drive. I'm
16 not sure where it was produced to.

17 Does that make sense?

18 Q Yes.

19 So, just for context, when you talk
20 about the team members that -- and the services
21 provided, you're talking about the services that
22 were provided by a team that included Paul Maggio

1 with respect to copying and preserving data from
2 election equipment in Coffee County. Is that
3 right?

4 A Yes.

5 Q Okay. And are you aware that
6 Mr. Maggio produced to us a hard drive that had
7 data that that team had copied from Fulton County?

8 A Yes.

9 Q Okay. I'm sorry, I --

10 A No, no. I should have asked.

11 Q Let me clean up the question because
12 I misspoke.

13 A Yeah.

14 Q Produced to us a hard drive that had
15 the data that that team copied from Coffee County?

16 A Yes.

17 Q Okay. And did you look at -- at
18 those files in whatever form the firm has them?

19 A No. I looked at the reports, not the
20 actual files.

21 Q Okay. And when you say "reports,"
22 what do you mean?

1 A Chain-of-custody information, which
2 outlines were provided.

3 Q Okay. Did you -- in preparing for
4 today, did you review any documents that, to your
5 knowledge, have not been produced to the parties in
6 discovery?

7 A No, sir.

8 Q Okay. Are you aware of any photos or
9 video that the firm has with respect to the
10 services provided for Coffee County that have not
11 been produced in this case in discovery?

12 A No.

13 Q Okay. And did you undertake any
14 efforts to determine whether any such photos or
15 video exists?

16 A No.

17 Q If you wanted to do that, who would
18 you ask?

19 A Jennifer Jackson.

20 Q Who is she?

21 A She handled the chain of custody at
22 intake on-site.

1 Q When you say "on-site," you mean
2 on-site where?

3 A At Coffee County.

4 Q Okay. And just so we're clear, we're
5 talking about Coffee County, Georgia?

6 A Yes.

7 Q Do you know whether any of the photos
8 that were produced to us were changed in any way
9 for production?

10 Like, was a photo cropped, for
11 example, like we got a part of a photo and not the
12 whole photo?

13 A I don't know. The information on the
14 photos contain all the chain-of-custody
15 information. So by cropping, maybe to narrow down
16 exactly what was collected, I guess, but I would
17 say no.

18 Q Okay. And to be clear,
19 Mr. Felicetti -- am I saying that right?

20 A Yeah.

21 Q I'm not looking for you to guess or
22 speculate or assume anything today --

1 A Okay.

2 Q -- so only tell me what you know.

3 A I appreciate that.

4 Q You know, in natural conversation, we
5 assume things all the time, but I'm not looking for
6 that today.

7 A Excellent.

8 Q Okay. You said in addition to -- oh,
9 so we're talking about the documents.

10 Are there any other documents --
11 well, sorry, let me take a step back.

12 Is there anything else you can tell
13 me about the documents that you reviewed in
14 preparation for today?

15 We talked about the photos. We
16 talked about reports. What else?

17 A No.

18 Q Okay. Is there anything that you're
19 aware of that was produced to us by Mr. Maggio that
20 you did not review in preparation for today?

21 A No.

22 Q You said you also spoke with team

1 members. Who did you speak with for today's
2 deposition?

3 A I spoke with the team members that
4 were on-site at Coffee County, Georgia.

5 Q And who were those people?

6 A Jim Nelson, Paul Maggio, Jennifer
7 Jackson, and Karuna Naik.

8 Q And Naik, is that N-A-I-K?

9 A Yeah.

10 Q And Karuna is K-A-R-U-N-A?

11 A Yeah.

12 Q Okay.

13 A Good job.

14 Q You obviously coach kids, you just
15 gave me a gold star.

16 A Yes, that's it.

17 Q All right. So if we can walk through
18 each of those. Who is Jim Nelson?

19 A Jim Nelson is a IT/technical expert
20 that works for SullivanStrickler.

21 Q What is his role?

22 A His role in the company?

1 Q Yes, sir.

2 A He handles data migration, data
3 collection, converting legacy data, back-up tape
4 data, historical data, taking data that may be
5 inaccessible for review. I guess that's the wrong
6 term, but to look at it natively or to be able to
7 look at these files, he'll take some historic data
8 that may be a challenge to convert and put it into
9 a format that is reviewable, whether that's IT,
10 information.gov, forensics, et cetera.

11 Q Do you know just generally how long
12 he's been at the firm?

13 A No.

14 Q All right. Do you know generally
15 what his education and experience are?

16 A Experience, I knew he worked at a
17 company called eMag, which was not unlike the
18 company SullivanStrickler. So it was a very
19 similar company dealing with data and IT services.
20 Other than that, I don't -- I don't know what
21 his . . .

22 Q All right. Let me hand you what's

1 been marked as Exhibit 2.

2 A Sure.

3 (Felicetti Deposition Exhibit Number 2
4 marked for identification.)

5 BY MR. CROSS:

6 Q Who is this?

7 A That is Jim Nelson.

8 Q Okay. Is this the Jim Nelson we were
9 just talking about who's at SullivanStrickler,
10 right?

11 A Yes, sir.

12 Q Okay. Thank you.

13 What was -- well, actually I'll come
14 back to that. Never mind.

15 You also mentioned Jennifer Jackson.
16 Who is she?

17 A She is the CRO at SullivanStrickler,
18 chief relationship officer.

19 Q And what is her role?

20 A Relations with our clients with
21 regards to communication, updates, marketing, as
22 well as project management. That's it that I can

1 think of.

2 Q Does she have any computer science
3 background?

4 A She's technical. She has an
5 e-Discovery background, so I guess by virtue of
6 that, yes.

7 Q Do you know about how long she's been
8 at the firm?

9 A No.

10 (Felicetti Deposition Exhibit Number 3
11 marked for identification.)

12 BY MR. CROSS:

13 Q All right. Let me hand you
14 Exhibit 3. Who is that?

15 A Jennifer Jackson.

16 Q Is this the Jennifer Jackson that
17 we've been talking about at your firm?

18 A Yes, sir.

19 Q All right. You mentioned Karuna
20 Naik.

21 A Yes.

22 Q Who is she?

1 Is it Nike or Nik [pronounced
2 phonetically]?

3 A I'm sorry. Now I put you on the
4 spot. Some people call her Nik. I call her Naik
5 [pronounced phonetically], so can we call her Naik
6 for this?

7 Q Sure.

8 A It's just easier for me.

9 Q Okay.

10 A She is a forensic expert, recently
11 promoted to our director of forensics.

12 Q When you say "forensic expert," what
13 does that mean?

14 A She provides the level of forensic
15 collection expertise that allows her the ability to
16 provide defensible forensic collection of data.

17 Q When you say --

18 A Does that help?

19 Q Yes.

20 And when you say "defensible forensic
21 collection," what does that mean?

22 A There are ways to collect data in

1 which you keep metadata intact or data intact
2 without leaving a footprint. And obviously that's
3 what we do, and that's -- she is an expert at that,
4 as well as she is now managing the team, or as her
5 promotion, handling other experts.

6 Q When you say "collecting data without
7 leaving a footprint," what does that mean?

8 A When you are asked to image the data
9 by a law firm, the goal is to obviously not leave a
10 footprint, like modifying timestamps, date stamps,
11 that you touched the data, that you altered the
12 data, et cetera. So you collect it in a way in
13 which the metadata, the data around the data, both
14 external and internal, remains intact.

15 So does that answer your question?

16 Q Yes.

17 And is sort of part of the idea that
18 you're collecting the data in a way that one does
19 not alter the data; and, two, sort of doesn't leave
20 traces behind on the original equipment that the
21 data had been touched or copied or accessed?

22 A Yes. A pristine copy, or a

1 preservation copy it's also referred to as.

2 Q Okay. And that's among the services
3 that SullivanStrickler provides?

4 A Yeah. Yes.

5 Q And was that among the services that
6 were engaged for Coffee County?

7 A Yes.

8 Q Is there a difference between
9 Ms. Naik's training expertise and Mr. Nelson's?

10 A Yes.

11 Q In what way?

12 A Different technologies warrant
13 different skill sets with regards to collections of
14 data.

15 Q And let me show you Exhibit 4.

16 (Felicetti Deposition Exhibit Number 4
17 marked for identification.)

18 BY MR. CROSS:

19 Q Who is this?

20 A This is Karuna Naik of
21 SullivanStrickler.

22 Q Okay.

1 A She's the best. No, she's the best
2 to work with.

3 Q And then last, you mentioned Paul
4 Maggio. What is his role at the firm?

5 A He is the chief operating officer of
6 the firm.

7 Q And what does he do as the chief
8 operating officer?

9 A Provides technical services from
10 forensic collections to e-Discovery services, as
11 well as the overall day-to-day operations of the
12 organization.

13 Q Does he have forensic expertise in
14 the way that you described for Ms. Naik?

15 A He has forensic expertise of
16 different technologies.

17 Q All right. Let me hand you
18 Exhibit 5.

19 A Sure.

20 (Felicetti Deposition Exhibit Number 5
21 marked for identification.)

22

1 BY MR. CROSS:

2 Q Who is this?

3 A Paul Maggio, the COO of
4 SullivanStrickler.

5 Q Okay. Thank you.

6 A You're welcome.

7 Q Were there -- was there anyone else
8 at SullivanStrickler that was part of or supported
9 the team that did the work for Coffee County?

10 A No.

11 Q Is there someone at SullivanStrickler
12 named Greg Freemyer?

13 A Yes.

14 Q And what is his role at the firm?

15 A He provides forensic services. He
16 was previously the director of forensic services,
17 but now Karuna is. He is in charge of R&D.

18 Q And did he have any involvement with
19 the team that did the work in Coffee County?

20 A I don't know.

21 Q Do you know each of these people,
22 Mr. Nelson, Mr. Maggio, Ms. Jackson, and Ms. Naik,

1 personally?

2 A Personally, how? Personally versus
3 virtually?

4 Q Fair enough.

5 Have you met them personally?

6 A Yes.

7 Q Have you worked with them on
8 projects?

9 A Yes.

10 Q With respect to the services that
11 were provided for Coffee County, now I'd like to
12 drill down a little more and just understand what
13 the role was for each of them on that specific
14 team.

15 A Of course.

16 Q So if we can go back and we'll start
17 with Paul Maggio. What was his role with respect
18 to those services?

19 A Paul Maggio was team lead and was in
20 charge of the forensic collection of the polling
21 pads. And he was our main point of contact
22 on-site/project manager, the lead.

1 Q And when you say he was responsible
2 for the forensic collection of poll pads, what does
3 that mean?

4 A Each on-site expert, because of skill
5 set, focuses on certain areas, buckets of data. So
6 that was his, for lack of a better term, buckets of
7 data to forensically collect.

8 Q Meaning Mr. Maggio was personally
9 responsible for collecting the data off of the
10 electronic poll pads in the Coffee County office?

11 A Yes.

12 Q Was there anything else that he was
13 responsible for the forensic collection of in that
14 office?

15 A No.

16 Q And you said he was the lead. Did he
17 otherwise have responsibility for generally
18 overseeing the work of the team?

19 A Yes.

20 Q What was Mr. Nelson's role on that
21 team?

22 A He collected the -- collected -- he

1 imaged the EMS server.

2 Q When you say "imaged the EMS server,"
3 what does that mean?

4 A Forensically imaged, created a
5 forensic image of the drives in the server.

6 Q Is this what we talked about before
7 capturing what you said is a pristine image?

8 A Yes.

9 Q Was there anything else he was
10 responsible for collecting in Coffee County?

11 A No.

12 Q Did he have any other
13 responsibilities on this --

14 A Can I go back to that question?

15 Q Sure.

16 A Is that okay?

17 There may have been a hard drive.

18 Q In the --

19 A Do you mind if I look at my notes?

20 Q Sure.

21 A Okay.

22 Oh, yeah. He also collected thumb

1 drives and hard drives. Sorry about that.

2 Q That's okay.

3 The notes you're looking at, are
4 those notes you took when you spoke to these
5 individuals to help prepare for today?

6 A Yes.

7 Q Okay. The thumb drives that
8 Mr. Nelson talked about, what can you tell me about
9 those?

10 A I don't know.

11 Q Those were thumb drives that were
12 found in the Coffee County election office, and --
13 and he was responsible for collecting data off of
14 those?

15 A Those specific thumb drives, yes.

16 Q Were there other thumb drives that
17 someone else was responsible for?

18 A Yes.

19 Q Okay. Got it. We'll come back to
20 that.

21 A Sure.

22 Q Do you have an understanding of what

1 was collected off the thumb drives that Mr. Nelson
2 collected from?

3 A I do not.

4 Q Was there anything -- what can you
5 tell me about those thumb drives?

6 A They were -- as I understand it, they
7 were -- there was a large repository of thumb
8 drives that was -- the imaging was facilitated by
9 somebody else. And these particular thumb drives
10 were tied into the EMS server, the election
11 management server. And I don't -- unfortunately, I
12 don't have any other details other than that.

13 Q The ones that Mr. Nelson imaged were,
14 to your understanding, thumb drives that were used
15 with the EMS server?

16 Just when you say "tied into," what
17 do you mean?

18 A I don't know. I don't know, no.

19 Q And then you said Mr. Nelson also was
20 responsible for imaging hard drives. What can you
21 tell me about that?

22 A As I understand it, there was one

1 hard drive that failed during imaging. The hard
2 drive didn't fail, the image creation failed, let
3 me rephrase that. And so it was given to Jim to
4 take a look at. So it was an image.

5 Q Just one?

6 A Yeah. As I understand, it was one.

7 Q Okay. What can you tell me about
8 that hard drive in terms of what was on it, what it
9 was used for?

10 A I don't know.

11 Q Okay. Do you know whether he was
12 able to get the data off of it?

13 A I do. He was able to image it.

14 Q Are we talking about just a
15 standalone hard drive or a hard drive inside of
16 another device?

17 A It -- I don't know.

18 Q Do you have any information about
19 what that hard drive was used for in the office?

20 A I do not know.

21 Q Any information on the type of data
22 that was on it?

1 A I do not know.

2 Q Okay. You said there was another set
3 of thumb drives that were imaged by someone else.
4 Who was that?

5 A Karuna.

6 Q Okay. What were those thumb drives
7 used for?

8 A Those thumb drives were a collection
9 of -- let me think. Can I look at my notes again?

10 Q Uh-huh.

11 A Sorry. This is a lot.

12 Thumb drives. (Witness reading from
13 document.) I do not know.

14 Q These thumb drives, or thumb drives,
15 were in the elections office?

16 A Yes. Yes, sir.

17 Q And to your understanding, they were
18 used with the election equipment?

19 A Yes, sir.

20 Q So to take a step back, what was
21 Ms. Naik's role on the team?

22 A Forensic imaging.

1 Q What all did she have responsibility
2 for forensic imaging in addition to the thumb
3 drives?

4 A SD cards, CompactFlash cards.

5 Q Is there a difference between an SD
6 card and a CompactFlash card?

7 A CompactFlash cards.

8 Q Okay. Basically the same thing?

9 A Yeah.

10 Q What was on the CompactFlash cards
11 that she imaged?

12 A I believe it was the -- hold on one
13 sec. I should know this. Can we come back to
14 that?

15 Q Sure.

16 A So maybe it'll --

17 THE WITNESS: Is that all right with
18 you guys?

19 MR. COLEMAN: That's up to you.

20 THE WITNESS: It should --

21 BY MR. CROSS:

22 Q It's okay.

1 A -- but right now I don't know.

2 Q Okay. So she imaged CompactFlash
3 drives and thumb drives. Anything else in the
4 office?

5 A No. That was it.

6 Q Did she have any other
7 responsibilities on that team?

8 A Those were her primary
9 responsibilities. I guess -- no, that would be it.

10 Q That takes us to Jennifer Jackson.
11 What was her role?

12 A Documentation, chain of custody.

13 Q What do you mean by "chain of
14 custody"?

15 A So for each piece of -- each target
16 piece of media that was imaged, we tagged with a
17 code, an identifier, take a picture, and log for
18 chain of custody. So we have a -- a means of which
19 to track everything that was going to be collected.

20 Q Why is chain of custody important
21 with data and devices like this?

22 A The chain of custody is required,

1 one, for the ability obviously to track when data
2 is handed to a third party for imaging, to identify
3 the fact that we are in ownership of that
4 particular piece of media for a certain length of
5 time. And it's used for tracking, logging
6 historical information, et cetera. So we can track
7 back where a particular drive was imaged from, who
8 the -- what's your -- what it was labeled as, any
9 other identifiers.

10 It's also used as a means to
11 physically check media for any damage, any --
12 anything that looks out of place. So you're in a
13 position to look at something and say, "Well, you
14 know, before we move forward with this, please note
15 that, I don't know, it looks like it failed," or
16 something like that. But it's another means in
17 which to -- to track information, not only the
18 physical state of it, but just the documentation to
19 track it all the way back.

20 Q Is maintaining chain of custody with
21 respect to computer equipment and data, is that
22 generally considered a best practice?

1 A Absolutely.

2 Q Why?

3 A Chain of custody is for forensic
4 companies, back-up tape companies, couriers, et
5 cetera, is a means in which to take ownership of
6 evidence for the sake of whatever their service may
7 be. So for us, we're brought in by attorneys to
8 image stuff and then deliver what we imaged to the
9 attorneys.

10 Without that tracking mechanism,
11 there's no way to tie back, not only what we
12 collected, but what we collected maybe back to a
13 custodian, et cetera. So it's vitally important.

14 Q Is it important to maintain chain of
15 custody with computer equipment so that you have
16 a -- a record of who has had access to it?

17 A Not necessarily, no.

18 Q Why not?

19 A If you receive a box of drives that
20 you're imaging, the chain of custody would only
21 provide what you have physically in your hand.
22 When you begin a discovery process or a forensic

1 analysis, at that point you're now digging deeper
2 into the things that you would be talking about,
3 last access, modified, et cetera, et cetera, but
4 chain of custody wouldn't get you that.

5 Q I see. In that situation, okay.

6 When your firm is engaged to access
7 computer equipment, is it important to -- to
8 maintain the chain of custody in terms of from
9 start to finish who had access to that equipment,
10 what was done with it, all the way through the end
11 of the point at which the project ends?

12 A Yes.

13 Q Okay. Why is that important?

14 A Taking ownership of -- of devices
15 becomes the responsibility of the forensic company
16 that's handling the work. At which point, the
17 ability to hand it back and have a means to track
18 that is tracking that chain of custody, and it's
19 vital.

20 Q Did SullivanStrickler carefully track
21 the chain of custody with respect to the Coffee
22 County project?

1 A Yes, sir.

2 Q And to your understanding, did it
3 comply with firm policy and best practices?

4 A Yes, sir.

5 Q It sounds like Ms. Jackson was one of
6 the people responsible for that. Is that right?

7 A Yes, sir.

8 Q Was anyone else -- did anyone else
9 have responsibility with respect to the chain of
10 custody?

11 A No. No.

12 Q You said she was responsible for
13 documentation. What do you mean?

14 A Logging. As part of the chain of
15 custody, logging a code that we identify a piece of
16 media as, as well as any physical labels that may
17 be on a device or a hard drive, and our internal
18 code that we use for tracking.

19 Does that help?

20 Q Yes.

21 A Okay.

22 Q But just -- I understand what you

1 mean, but for the record, explain what you mean
2 when you say "internal code for tracking."

3 A So SullivanStrickler utilizes a
4 project code, an internal code, that we reference
5 not only in chain of custody, but in the
6 communications back and forth as a means for
7 tracking and consistency.

8 Q Does every project get assigned an
9 internal code?

10 A Yes, sir.

11 Q And one was assigned here, right?

12 A Yes, sir.

13 Q Do you recall was the code here
14 SSA1722?

15 A I can't tell you right now, but I'm
16 going to check.

17 Yes, sir.

18 Q Okay. What other responsibilities
19 did Ms. Jackson have, if any, on this team?

20 A I -- I don't know aside from chain of
21 custody.

22 Q Who took the photos that were

1 produced?

2 A Jennifer Jackson.

3 Q Is that part of her responsibility in
4 terms of documenting the work?

5 A Yes, sir.

6 Q So taking those photos, is that a --
7 is that a part of your standard procedures for this
8 type of project?

9 A It is a normal procedure.

10 Q Do you know whether anyone involved
11 with the work, including people in Coffee County's
12 office, did anyone object to the photos?

13 A I don't know.

14 Q Sorry, I may have asked you before.
15 Is there anyone else who had any responsibility
16 either on or supporting the Coffee County team
17 beyond these four individuals?

18 A No.

19 Q How did the firm select the team
20 members for the Coffee County project?

21 A Based on experience, capabilities.

22 Q Who generally makes the decision on

1 who is assigned to a project like this?

2 A Paul Maggio.

3 Q So in the general course, Paul Maggio
4 would have selected the people for this team?

5 A Yes.

6 Q Do you know whether employees at the
7 firm have the option to opt out of a project if
8 they are asked to work on it?

9 A They do.

10 Q Do you know whether anyone was asked
11 to work on the Coffee County project and declined?

12 A I do not know.

13 Q Okay. Who would you ask if you
14 wanted to know?

15 A Paul Maggio.

16 Q Do you know whether anyone, whether
17 on the team or otherwise, at SullivanStrickler
18 expressed any concerns about taking on this work?

19 A I don't know.

20 Q Do you know whether anyone expressed
21 any concerns at all about working on the team?

22 A I don't know.

1 Q Who engaged SullivanStrickler to do
2 the work in Coffee County?

3 A Jim --

4 Q Penrose?

5 A Yes, Jim Penrose and Doug Logan.

6 Q When did they first reach out to
7 SullivanStrickler for the work, approximately?

8 A Early January for Coffee County.

9 Q What's the basis for that testimony?

10 A Can you repeat the question?

11 Q Sure.

12 What's -- what's the basis for your
13 understanding that Mr. Penrose and Mr. Logan
14 reached out to the firm, specifically for Coffee
15 County, in early January?

16 A By virtue of requests for other
17 services outside of Coffee County. The request
18 came in that pointed to Coffee County, I believe,
19 in early January.

20 Q Okay. And just so I understand, for
21 that testimony, are you relying on documents you
22 looked at or people you spoke with or both?

1 A People I spoke with.

2 Q Okay. Who specifically?

3 A Paul Maggio.

4 Q When you say "early January," you
5 mean January 2021?

6 A Yes, sir.

7 Q Have you looked at any of the
8 engagement agreements that were signed with the
9 firm with respect to copying and preserving
10 election data?

11 A Yes, sir.

12 Q All right. Let's look at a couple of
13 those.

14 A Sure.

15 (Felicetti Deposition Exhibit Number 6
16 marked for identification.)

17 BY MR. CROSS:

18 Q Let me hand you --

19 A Perfect.

20 Q -- Exhibit 6.

21 Actually before you look at that --

22 A Yeah.

1 Q -- you've got a stack of documents
2 with you.

3 A Yes.

4 Q What do you have with you?

5 A I have the production stack.

6 Q On any of the documents that you have
7 with you, do you have notes on any of those
8 documents?

9 A I do not.

10 Q Okay. I didn't know if it would be
11 helpful for you to look at them.

12 A No.

13 Q All right. So do you recognize
14 Exhibit 6?

15 A I do.

16 Q Is this an engagement agreement for
17 forensic analysis of the SullivanStrickler firm?

18 A Yes, sir. Excuse me.

19 Q Do you need some water?

20 A I'm good.

21 Q Okay.

22 A Thanks.

1 Q And this engagement agreement is with
2 Jesse Binnall of the Harvey & Binnall firm. Is
3 that right?

4 A Yes, sir.

5 Q And it's dated November 30, 2020?

6 A Yes, sir.

7 Q Is this engagement agreement, does it
8 reflect the standard agreement and the standard
9 terms that SullivanStrickler uses?

10 A Yes, sir.

11 Q Does SullivanStrickler have different
12 types of standard agreements depending on the type
13 of project it's doing or does it have a standard
14 agreement sort of across the board?

15 A The agreement is standard aside from
16 if there was different services being provided. So
17 aside from forensic work, there may be back-up tape
18 recovery work, something like that. Mostly the
19 format on all the agreements or the template that
20 we use are as here.

21 Q Okay. So the SullivanStrickler firm
22 has a standard agreement it uses for all its

1 projects, but what might change are the specific
2 services that are going to be --

3 A Yes, sir.

4 Q Okay.

5 A Requirements, pricing, et cetera.

6 Q And are you familiar with Jesse
7 Binnall?

8 A Familiar how?

9 Q Have you heard of him?

10 A I have.

11 Q And -- and what do you know about
12 him?

13 A I only know based on my discussions
14 with the team on who he is.

15 Q And what is your understanding of who
16 he is?

17 A An attorney that executed the
18 documentation for us to kick off forensic
19 collections.

20 Q And you understand that Jesse Binnall
21 is a personal lawyer for Donald Trump?

22 A No.

1 Q You had not heard that before now?

2 A Huh-uh.

3 Q No?

4 A No, I have not.

5 Q If you look at the second page of
6 this agreement, Exhibit 6 --

7 A Uh-huh.

8 Q -- those are signatures by Paul
9 Maggio and Jesse Binnall. Is that right?

10 A Yes, sir.

11 Q Okay. And it looks like the -- the
12 signature page for Mr. Binnall is dated
13 December 2nd of 2020, right?

14 A Yes, sir.

15 Q If you look at the third page of the
16 agreement where it says "Exhibit 1 Overview," is
17 this overview page, is that generally something
18 that's standard, the substance will vary, but the
19 inclusion of it, is that standard in your
20 engagements?

21 A Yes, sir.

22 Q What is the purpose of that?

1 A Outline requirements as requested of
2 a client to outline what we're collecting, general
3 overview of requirements, and what is being asked
4 for us -- from us.

5 Q And here in this one, we have
6 "Requirements." And it says, "The following were
7 defined during a phone call, face-to-face meetings,
8 and/or e-mail interactions between customer and" --
9 "SS" is SullivanStrickler, right?

10 A Yes, sir.

11 Q And "customer," that would be
12 Mr. Binnall?

13 A Yes, sir.

14 Q So, "Between customer and
15 SullivanStrickler representatives has requirements
16 to be satisfied through the performance of services
17 by SullivanStrickler."

18 And then this next paragraph is sort
19 of a general overview of those services. Is that
20 fair?

21 A Yes.

22 Q And here, what was agreed was

1 customers requesting that SullivanStrickler provide
2 services such as computer forensic elections and
3 analytics on the Dominion Voting Systems equipment,
4 from the poll pads, and in parenthesis iPads, to
5 the Windows machines that run the scanners, to the
6 Linux machines that tabulate the votes in the state
7 of Nevada and subsequent work in the state of
8 Georgia.

9 Do you see that?

10 A Yes, sir.

11 Q What -- what work was anticipated
12 with respect to the state of Georgia in this
13 agreement with Mr. Binnall?

14 A I don't know.

15 Q If you look at page 5 --

16 A Yep.

17 Q -- here there's a heading of
18 "Pricing."

19 A Yes, sir.

20 Q And is it generally part of the
21 contracting practices to have a section like this
22 on pricing in your agreements?

1 A Yes, sir.

2 Q And the first is State of Nevada. Do
3 you see that?

4 A Yes, sir.

5 Q Flat rates and then there's a
6 breakdown of those rates, right?

7 A Yes, sir.

8 Q And then below that, do you see
9 "State of Georgia work"?

10 A Yes, sir.

11 Q And there's a lot more detail on the
12 state of Georgia work here, right?

13 A Yes.

14 Q And here it includes forensic
15 collections/computer hard drives, Windows or Linux,
16 and then there's a rate, right?

17 A Yes.

18 Q And that 895, that's a charge per
19 hard drive that would be collected?

20 A Yes, sir.

21 Q And then the next is encrypted
22 versions of Windows devices/servers at 1,500 per

1 system, right?

2 A Yes, sir.

3 Q Then the next one is forensic
4 collection/mobile devices or tablets/iPads, and
5 that's a rate \$950 per device?

6 A Yes, sir.

7 Q The next is senior forensic expert
8 technical time, and that's charged at \$325 an hour?

9 A Yes, sir.

10 Q And that hourly, that would be work,
11 for example, what Mr. Maggio did on the forensic
12 collection of the poll pads, that you charged by
13 the hour?

14 A No, not necessarily.

15 Q That might be charged by device?

16 A Right. So a device fee, and then if
17 there is forensic analytical work that's required,
18 then there's an hourly rate associated with that.

19 Q I see.

20 A And it's contingent at the project
21 level, so whatever the demand of the project may
22 be.

1 Q So the collection is typically
2 charged on a per-device rate, and if there's some
3 forensic analysis of the data subsequent, that
4 might be an hourly rate?

5 A Yes, sir.

6 Q Okay. And then there's forensic
7 expert technical time for the state of Georgia work
8 at \$275 an hour, right?

9 A Yes, sir.

10 Q And there's an expert witness time at
11 \$4.50 an hour?

12 A 450.

13 Q Oh, sorry.

14 A That's --

15 Q That would be a terrible --

16 A That's the rate --

17 Q Let's try that again.

18 So the expert -- the expert witness
19 time is \$450 an hour, right?

20 A Yes, sir.

21 Q And it says, "Includes reports and
22 affidavits," right?

1 A Correct.

2 Q Was there an anticipation for the
3 Binnall Agreement, that anyone at SullivanStrickler
4 might be an expert witness on -- with respect to
5 the Georgia work?

6 A Expectation? I don't know. And the
7 reason why I say that is because there's a level of
8 expectation of affidavit work for every forensic
9 project we work on. Whether it happens or not, we
10 have to be prepared in letting our clients know
11 that there's a subsequent cost to that.

12 Q Okay. Do you know -- do you know why
13 under the state of Georgia you have an expert
14 witness time with respect to reports and
15 affidavits, but that same bullet is not anticipated
16 for state of Nevada work?

17 A I do not know.

18 Q Okay. And then also under Georgia,
19 we've got travel time, if required, at 50 percent
20 of normal rate, right?

21 A Yes, sir.

22 Q And then under Georgia, destination

1 media at \$248 per encrypted hard drive, right?

2 A Yes, sir.

3 Q The data that's collected -- sorry,
4 strike that.

5 The data that was collected for
6 Coffee County, was that encrypted when it was
7 collected?

8 A Was that encrypted --

9 Q Let me ask a better question.

10 A Yeah.

11 Q Did Paul -- sorry, strike that.

12 Did SullivanStrickler take any
13 efforts on its own to -- to add encryption to data
14 that it copied from Coffee County?

15 A Yes.

16 Q Okay. What did it do to encrypt the
17 data that it copied?

18 A We used password-protected files. I
19 don't know the -- the technology. And we also, I
20 believe, used BitLocker on some data as well, some
21 drives.

22 Q What is BitLocker?

1 A It's an industry-standard encryption
2 technology that's utilized for destination, either
3 preservation media, anything.

4 Q The encryption that was used for the
5 data from Coffee County, that does not alter the
6 substance of the data --

7 A No, sir.

8 Q -- the files?

9 Okay. And sorry, let me -- just make
10 sure I get my question finished before --

11 A Sure.

12 Q -- you --

13 A Yeah, I'm sorry.

14 Q No, that's okay. It happens all the
15 time.

16 A Yes.

17 Q It's just for the court reporter.

18 All right. And then we have under
19 Georgia work, "Relativity services." What is that?

20 A Relativity is a case management
21 review platform.

22 Q And that's something that

1 SullivanStrickler has a license to?

2 A Yes, sir.

3 Q Was Relativity ultimately used with
4 respect to the Coffee County work?

5 A I don't know. I would say no based
6 on we didn't host anything in Relativity, so the
7 short answer is no.

8 Q Okay. To the best of your knowledge,
9 nothing was -- none of the data copied from Coffee
10 County was loaded into a Relativity platform?

11 A Correct.

12 Q And then the next bullet, "Storage.
13 Devices may be stored at the Vault for the
14 following fees:"

15 Do you see that?

16 A Oh, yes, sir.

17 Q What's "the vault"?

18 A We -- our building is a vault. It's
19 an old accounting facility that was owned by a
20 bank. So we securely manage and vault physical
21 media and data.

22 Q So literally like an old bank vault?

1 A Yes, it is.

2 Q Like a big steel door?

3 A It's very cool.

4 Q Okay.

5 A It's very cool. You're welcome to a
6 tour when this is all done.

7 Q Was any of the Coffee County data --

8 A Strike that you're welcome to a tour
9 thing. My bad. Oops. I'm trying my best here,
10 give me some slack.

11 Q Yeah, you're doing fine.

12 A Okay, thanks.

13 Q You're doing fine.

14 Was the Coffee County data ultimately
15 stored in the vault for any period?

16 A Yes, sir.

17 Q Is there data from Coffee County
18 still stored in the vault?

19 A Yes, sir.

20 Q Was that data ever stored outside of
21 the vault?

22 A No, sir.

1 Q And that data was ultimately uploaded
2 to a file share site on the internet?

3 A Yes, sir.

4 Q Okay. Do you know why with the
5 Binnall Agreement, there's a lot more detail and
6 what looks to be a lot broader scope of work
7 anticipated for Georgia than there was for Nevada?

8 A I do not.

9 Q If you wanted to know the answer to
10 that, who would you ask?

11 A Paul Maggio.

12 Q You said earlier that your
13 understanding from talking to Mr. Maggio was that
14 the firm was first engaged to do work in Georgia in
15 early January 2021, but we have an agreement with
16 Mr. Binnall from November 30 that anticipates a
17 pretty broad scope of Georgia work.

18 Do you know -- can you explain that
19 to me?

20 A Sure. As I understand it, the -- and
21 I don't know anything really other than Coffee
22 County, so I don't know what was done in Nevada,

1 but I know that there was the potential, I believe,
2 at that time to do work in Georgia, but it never
3 came to fruition, as I understand it. So the -- so
4 not that it went stale, but it kind of went away.

5 And then an e-mail went out regarding
6 doing some work in Georgia, which I believe is
7 covered in another engagement letter. So this one,
8 as I understand it, became irrelevant to what was
9 being done in Georgia. So I -- honestly, I don't
10 know.

11 Q Okay. So do I understand correctly
12 that the scope of work laid out in the Binnall
13 Agreement in November of 2020, with respect to
14 Georgia, that work was anticipated as a possibility
15 as of that time, but the firm did not get an actual
16 green light to do Coffee County work until early
17 January of 2021?

18 A Yes, sir.

19 Q And then on the overview page --

20 A Which?

21 Q Sorry. Back one page.

22 A Yeah.

1 Q -- we read this language before, that
2 these requirements were defined during phone calls,
3 face-to-face meetings, and/or e-mail interactions.

4 Were there face-to-face meetings
5 between anyone at SullivanStrickler and Mr. Binnall
6 or anyone at his firm?

7 A I don't know. That is standard
8 language as well in our statements of work.

9 Q If you wanted to know, would you ask
10 Paul Maggio?

11 A Yes, sir.

12 Q All right. Flip to where it says
13 Exhibit 2, still in the Binnall Agreement. And
14 does this reflect what we were talking about
15 earlier, your standard terms of service, but the
16 specific work to be done might change a bit from
17 agreement to agreement, or are these all just your
18 standard terms?

19 A Standard terms.

20 Q Okay. If you look at this -- go
21 ahead, if you need to flip through it.

22 A No, I'm sorry. That's fine.

1 Q If you look at the second page of the
2 "Terms of Service," do you see the Number 4
3 heading --

4 A Sorry about that.

5 Q And by the way, I should have told
6 you at the start, if you need to take a break at
7 any point, just let me know.

8 A Okay. I appreciate that.

9 Q Otherwise, I will tend to just keep
10 going.

11 A Okay.

12 Q I'm happy to -- I'm happy to break.

13 A I might need water soon, but right
14 now, I'm good. Thank you.

15 Q I was just thinking the same. Why
16 don't we finish this and then we take a break.

17 A That would be great.

18 Q Okay. So Number 4, "Customer's
19 Representations and Warranties." So that's a
20 standard term in your agreements?

21 A Yes, sir.

22 Q And so here it reads, "The Customer

1 hereby represents and warrants the Company and
2 agrees that during the term, Customer will ensure
3 that, A, customer is the owner or valid licensee of
4 all the information, documents, graphic items, and
5 other data of every kind and description. The
6 Customer may process through its receipt of the
7 services or use in the services." And then it goes
8 on from there.

9 Actually, then it goes on, "And
10 Customer has secured all necessary licenses,
11 consents, permissions, waivers, and releases for
12 the use of the customer content and each element
13 thereof, including without limitation, all
14 trademarks, logos, names, and likenesses contained
15 therein, without any obligation by Company to pay
16 any fees, residuals, guild payments, or other
17 compensation of any kind to any individual,
18 partnership, joint venture, corporation, limited
19 liability company, trust, unincorporated
20 association or organization, or government or any
21 agency or political subdivision thereof."

22 Do you see that?

1 A Yes, sir.

2 Q And this is a standard term for you?

3 A I think. And the reason why I say
4 that is the terms. If there are changes that have
5 been made with track changes and accepted or
6 something that I just don't know, I wouldn't know
7 that. I don't know it well enough to know the
8 specific language for each tenets unfortunately.

9 Q Fair enough.

10 But the general concept that's
11 captured here in the representations of what we
12 just read, it would be general practice to have
13 language along those lines?

14 A Yes, sir.

15 Q What was the -- what is the purpose
16 of this language in your engagement agreements?

17 Let me ask you a better question and
18 see if I can help you.

19 A Yes, please.

20 Q Is the purpose of this language
21 intended to help SullivanStrickler ensure that the
22 work that it is doing, that it has all the sort of

1 legal permissions and rights to do?

2 A Yes, sir.

3 Q And was it SullivanStrickler's
4 understanding, with respect to the Binnall
5 engagement, that any work done pursuant to this
6 agreement, the firm, through the customer, here
7 Mr. Binnall, would have all the legal permissions
8 and rights to do whatever work it would do?

9 A Yes, sir.

10 Q Does the firm have any standard
11 policies or practices with respect to these types
12 of engagements to sort of confirm or validate for
13 itself that the customer does, in fact, have all of
14 the necessary legal rights and permissions for the
15 work to be performed?

16 A So maybe I'm understanding the
17 question wrong. So are you asking if the attorneys
18 that are hiring us to do the work --

19 Q No. I'm sorry.

20 Let me ask -- so you've got standard
21 language that says we want to make sure that the
22 customer engaging us has all the legal rights and

1 permissions to do what it's asking us to do.

2 A Right.

3 Q Okay. In addition to having that
4 sort of protection in the agreement, does
5 SullivanStrickler, as some standard practice, do
6 any sort of its own due diligence to say, "Let's
7 just make sure the customer does, in fact, have all
8 those rights and permissions"?

9 A No.

10 Q So the general practice of the firm
11 would be to trust that your customer is being
12 straight with you, that that customer has the right
13 to do what they're asking you to do?

14 A Yes.

15 Q Does the firm generally work for
16 lawyers?

17 A Yes, sir.

18 Q Is the idea of the firm that because
19 lawyers are officers of the court, the firm should
20 be able to rely on them for ensuring compliance
21 with these terms?

22 A Yes, sir.

1 Q With respect to Coffee County in
2 particular, did the firm get what it believed were
3 assurances from Coffee County election officials
4 that it was allowed to do the work that it was
5 doing?

6 A Assurance in that they pointed out
7 what needed to be imaged and identified what we
8 were to be collecting, yes.

9 Q And by "they," you're talking about
10 Coffee County election officials who were
11 on-site --

12 A People that were on-site, correct.
13 Yes, sir.

14 Q On-site in the elections office
15 during the copying?

16 A Yes, sir.

17 Q And it was the understanding of
18 SullivanStrickler that at least some of those
19 individuals giving that direction were election
20 officials for Coffee County?

21 A Yes, sir.

22 Q Is it your understanding now, with

1 what you've learned since, that the individuals who
2 engaged SullivanStrickler for the Coffee County
3 work, in fact, did not have the legal authority or
4 permissions to do what they asked you to do?

5 A No.

6 Q What is your understanding about
7 that?

8 A That the direction provided by us was
9 under a legal umbrella of a directing attorney.

10 Q Okay. And sorry, let me -- let me
11 try to break that down a little bit.

12 A Sure.

13 Q Is the view today of
14 SullivanStrickler that the work that it did did not
15 violate any laws? Is that fair?

16 A Yes, sir.

17 Q And that view is based, in part, on
18 the assurances received from the customer who
19 engaged the firm for that work and the direction
20 that the firm received on-site from election
21 officials in Coffee County. Is that fair?

22 A Yes, sir.

1 Q Do you have any understanding
2 today -- let's -- let's put aside for a moment the
3 election officials.

4 A Sure.

5 Q Do you have any understanding today
6 that the customer that engaged SullivanStrickler to
7 do the work in Coffee County, that that customer
8 actually did not have the legal rights or
9 permissions to ask SullivanStrickler to do the work
10 it did in Coffee County?

11 A No, sir.

12 Q That's not something you've heard
13 before today?

14 A No.

15 Q Okay. And do I understand correctly
16 that even though the Binnall Agreement specifically
17 discusses the Georgia work, the work that was done
18 in Coffee County was done pursuant to a separate
19 agreement?

20 If you don't know, that's fine.

21 A I believe so, yes, sir.

22 Q Okay. And that's based on

1 discussions with Mr. Maggio and others?

2 A Yes.

3 Q The work that was done in Coffee
4 County, was that done -- was the customer for that
5 work Sidney Powell?

6 A Sidney Powell paid the bills.

7 Q What's your understanding of who the
8 customer was for the purpose of the engagement
9 agreement for the Coffee County work?

10 A Sidney Powell. Very good.

11 Q So is it SullivanStrickler's
12 understanding still today that Sidney Powell had
13 all of the necessary legal rights and permissions
14 for the work that she engaged SullivanStrickler to
15 do in Coffee County?

16 A Yes, sir.

17 Q What is the basis for that
18 understanding?

19 A Borrowed license at the time -- no,
20 see, I don't -- I don't know.

21 Q That's okay.

22 A Yeah, sorry.

1 Q No, that's okay.

2 If you -- sticking to the
3 agreement --

4 A Yeah.

5 Q -- turn to the page that has -- it's
6 two pages later.

7 A Sure.

8 Q -- heading 12, "Indemnification of
9 Company."

10 A Yep.

11 Q Is this another standard provision in
12 your agreements generally?

13 A Yes, sir.

14 Q And the idea here is that if
15 SullivanStrickler incurs any kind of cost with
16 respect to liability claims, for example, arising
17 out of the work, the customer will indemnify and
18 hold SullivanStrickler harmless for that?

19 A Yes, sir.

20 Q Has SullivanStrickler raised any
21 indemnification claim with respect to the Coffee
22 County work with the customer that retained the

1 firm for that?

2 A I don't know.

3 Q Again, your understanding is the
4 customer for that work was Sidney Powell?

5 A Yes, sir.

6 Q I promised you a break.

7 A I appreciate that.

8 VIDEOGRAPHER: The time is 10:22 a.m.
9 We are off video record.

10 (Recess from 10:22 a.m. to 10:34 a.m.)

11 VIDEOGRAPHER: The time is 10:34 a.m.
12 We are back on video record.

13 BY MR. CROSS:

14 Q You asked earlier that we come back
15 to the question about CompactFlash drives that
16 Ms. Naik copied. Have you recalled what was on
17 those? If not, we can come back to it later.

18 A We are going to have to come back to
19 it later.

20 Q That's fine.

21 A Yeah.

22 Q That's fine.

1 Okay. So let's look at 7. I'm going
2 to hand you Exhibit 7.

3 (Felicetti Deposition Exhibit Number 7
4 marked for identification.)

5 BY MR. CROSS:

6 Q And do you recognize this as an
7 engagement agreement for forensic analysis where
8 Sidney Powell retained the firm?

9 A Yes, sir.

10 Q And this is dated December 6, 2020.
11 Is that right?

12 A Yes, sir.

13 Q So this is about a week after the
14 engagement with Mr. Binnall that was November 30,
15 2020, right?

16 A Yes, sir.

17 Q And if you look on the first page of
18 the agreement, there's a -- it looks like an
19 eSignature by Sidney Powell. Do you see that?

20 A Yes, sir.

21 Q There doesn't look to be a signature
22 by Mr. Maggio, but is it -- was this engagement

1 operational?

2 A Yes, sir.

3 Q Okay. Why did the firm enter into
4 this agreement with Ms. Powell about a week after
5 the Binnall Agreement?

6 A I don't know.

7 Q If you look at, again, this overview
8 section, where it says Exhibit 1 under
9 requirements, we have the same first paragraph. Do
10 you see that?

11 A Yes, sir.

12 Q And then below, it gives the overview
13 for this agreement, which reads, "Customer," and,
14 again, here that's Sidney Powell, right?

15 A Yes, sir. Sorry.

16 Q That's okay.

17 So here Sidney Powell is requesting
18 that SullivanStrickler provide services such as
19 computer forensic collections and analytics on the
20 Dominion Voting System's equipment and the poll
21 pads, in parenthesis iPads, to the Windows machines
22 that run the scanners to Linux machines that

1 tabulate the votes in the state of Michigan.

2 Do you see that?

3 A Yes, sir.

4 Q So do I understand correctly that
5 this agreement with Ms. Powell was signed with
6 respect to forensic collection and analytics work
7 that was anticipated in Michigan?

8 A Yes, sir.

9 Q All right. How did it come to be
10 that the work done in Coffee County was done for
11 Ms. Powell instead of Mr. Binnall?

12 A As I understand it, the focus
13 shifted, I don't want to say from Michigan, but
14 maybe after Michigan, to Coffee County. And I
15 don't know why there are two different engagements,
16 one specifically for Jesse Binnall, versus this
17 one.

18 Q Okay. SullivanStrickler performed
19 forensic collection of data pursuant to the Binnall
20 agreement, right, in some jurisdiction?

21 A I don't know. I don't know what
22 happened in Nevada.

1 Q Okay. Is it your understanding that
2 the Binnall Agreement ended up being for work only
3 that would have occurred in Nevada?

4 A Yes, sir.

5 Q And so any work that was done in
6 Michigan and Georgia was done pursuant to the
7 Powell Agreement?

8 A Yes, sir.

9 Q All right. You can put that aside
10 for the moment.

11 A Okay.

12 Q I'll have some more questions in a
13 minute.

14 To kind of help with the context
15 here, let me hand you Exhibit 8.

16 A Sorry.

17 (Felicetti Deposition Exhibit Number 8
18 marked for identification.)

19 BY MR. CROSS:

20 Q All right. So Exhibit 8, this is an
21 e-mail thread between individuals at
22 SullivanStrickler, Ms. Powell, and a variety of

1 other folks that relate to, at least in part, the
2 work that was done in Coffee County.

3 Do you see that?

4 A Yes, sir.

5 Q Is this a document that you've seen
6 before today?

7 A I've seen this before.

8 Q So is this one of the things that
9 you -- you reviewed in preparing for the
10 deposition?

11 A Yes, sir.

12 Q All right. If you look at the last
13 page of the e-mail, there's an attachment, a
14 SullivanStrickler invoice. You can flip all the
15 way to the back.

16 A Yep.

17 Q Is this in the form of a standard
18 invoice for forensic work?

19 A Yes, sir.

20 Q And if you look here, it's sent to
21 Sidney Powell, Defending the Republic. Do you see
22 that?

1 A Yes, sir.

2 Q And if you look under the activity,
3 there's a date of January 7, 2021, "On-site Coffee
4 County, Georgia." Do you see that?

5 A Yes, sir.

6 Q And then there's another entry for
7 travel, right?

8 A Yes, sir.

9 Q So do I understand correctly the
10 invoice here was an invoice sent to Sidney Powell
11 for the collection that was done in Coffee County
12 on January 7, 2021?

13 A Yes, sir.

14 Q And the total was 26,000 for the
15 forensic work and \$220.64 for travel?

16 A Yes, sir.

17 Q Was this paid?

18 A I believe so. I don't know.

19 Q Would that be a question -- who would
20 that be a question for?

21 A Paul would know, Paul Maggio.

22 Q Okay. But as you sit here, you don't

1 have any reason to believe that the firm was never
2 paid for the work?

3 A Yeah, I would believe that it -- this
4 has been paid.

5 Q All right. So start in the back of
6 the thread. And we can go through it in
7 chronological order.

8 A Sure.

9 Q If you look at the bottom of these
10 little production numbers, the one ending in 49 --
11 or actually the bottom of 48 is where the first
12 e-mail starts.

13 A Yep.

14 Q So you see at the bottom of the page
15 ending in 48, there's an e-mail at November 30,
16 2020 from Jim Penrose. Do you see that?

17 A Yes, sir.

18 Q And his e-mail is Jim@fightbacklaw --
19 fightback.law. Do you see that?

20 A Yes, sir.

21 Q And this is an e-mail that is
22 addressed to Paul and Greg, right?

1 A Yes, sir.

2 Q So Paul Maggio and Greg Freemyer?

3 A Yeah.

4 Q And it starts out referring to an
5 opportunity in Nevada. Do you see that?

6 A Yes, sir.

7 Q And then it goes on to indicate that
8 the -- the lead attorney for the Nevada project
9 would be Jesse Binnall. Do you see that?

10 A Yes, sir.

11 Q And then there's a reference to Brian
12 Kennedy. Who is that?

13 A I don't know.

14 Q Okay. And then if you go to the top
15 of the next page, this is --

16 A Which Bates?

17 Q Oh, it ends in 49.

18 A Oh, on 49?

19 Q Yeah, if you go back.

20 A I'm sorry.

21 Q So we're still on the same e-mail
22 from Mr. Penrose. And it reads, "From our side,

1 Doug Logan" -- there's a cell number -- "will be
2 joining you and flying out there with you."

3 Do you see that?

4 A Yes, sir.

5 Q So do I understand correctly that
6 when the work was first contemplated for
7 SullivanStrickler to access voting equipment, that
8 first came at the direction of Jim Penrose and Doug
9 Logan?

10 A Yes, sir.

11 Q And did -- did they remain key points
12 of contact throughout the work that was done by the
13 firm with respect to copying election equipment?

14 A Yes, sir.

15 Q Including Coffee County?

16 A Yes, sir.

17 Q Okay. And then it goes on. "Your
18 POC on the ground Nevada is Todd from our team."

19 Do you know who Todd is?

20 A I do not.

21 Q And then below, do you see where it
22 says, "Todd, the SullivanStrickler POC for the

1 flight is Paul Maggio, the SullivanStrickler team
2 lead is Greg Freemyer"?

3 Do you see that?

4 A Yes, sir.

5 Q Was Greg Freemyer the team lead for
6 what was anticipated for Nevada?

7 A I don't know Nevada. I have no idea.

8 Q Okay. But your understanding is
9 Mr. Freemyer did not have involvement with the
10 Coffee County collection?

11 A Correct.

12 Q Okay. If you then come to -- come
13 back a page, so we're on the page ending in 48.

14 A Uh-huh.

15 Q So Mr. Binnall writes on the same
16 thread immediately after Mr. Penrose's e-mail,
17 "Send me an agreement and call my cell with any
18 questions."

19 Do you have that? Do you see that?

20 A Where? On 48?

21 Q Yeah, right there.

22 A Oh, yeah. Yes. I'm sorry.

1 Q No, it's okay.

2 So Mr. Binnall asked for an
3 agreement, right?

4 A Yes.

5 Q And then if you continue up through
6 the thread, December 1st, 2020, Paul Maggio sends
7 an engagement agreement for Nevada work, as well as
8 the possible Georgia work. Do you see that?

9 A Yes, sir.

10 Q And do I understand correctly, that
11 engagement agreement is the one that we looked at
12 earlier with Mr. Binnall?

13 A Yes, sir.

14 Q Okay. Then if you come to the bottom
15 of the page 46 -- ending in 46 --

16 A Yep.

17 Q -- there's an e-mail from Jesse
18 Binnall to Paul Maggio, still in the same thread.
19 And if you flip back the page, you'll see the
20 actual e-mail.

21 A Yeah.

22 Q And Mr. Binnall writes to Mr. Maggio,

1 "Paul, it looks like this one is going to Wood."

2 Do you see that?

3 A Yes, sir.

4 Q Do you understand that's a reference
5 to Lin Wood?

6 A I don't know.

7 Q Okay. Are you familiar with Lin
8 Wood?

9 A I am familiar with the name Lin Wood.

10 Q Do you have an understanding that Lin
11 Wood was involved with SullivanStrickler's
12 retention by Mr. Binnall or Ms. Powell with respect
13 to copying election equipment?

14 A I don't know.

15 Q Okay. And who do you understand Lin
16 Wood to be?

17 A Do you mind if I hit my notes?

18 Q Sure.

19 A Thank you.

20 Yeah, no, I do not.

21 Q Okay. All right. So let's keep
22 going.

1 A Sure.

2 Q Come to the -- let's see, come to the
3 page ending in 45. And do you see there's an
4 e-mail from Jesse Binnall to Paul Maggio,
5 December 1st, 2020, middle of the page?

6 Do you see that?

7 A Yes, sir.

8 Q And here Mr. Binnall indicates to
9 Mr. Maggio that he has signed the engagement
10 agreement. Do you see that?

11 A Yes, sir.

12 Q Okay. And then if you come to the
13 page ending in 44, Mr. Maggio indicates here,
14 e-mailing Mr. Binnall and a couple of other folks,
15 that he's sending the initial invoice for the
16 matter.

17 Do you see that?

18 A Yes, sir.

19 Q What work was that invoice for?

20 A I can make an assumption that --

21 Q I don't want you to assume. If you
22 don't know, that's okay.

1 A Yeah, I -- I don't know.

2 Q Okay. Had SullivanStrickler
3 performed any work in Georgia or with respect to
4 Georgia at this time?

5 A No, sir.

6 Q Okay. Then if you come up to the
7 bottom of the page ending in 43, at the bottom of
8 the page there's an e-mail from Paul Maggio, again
9 to Jesse Binnall and others. And he indicates,
10 "Attached are both invoices for the two days we
11 spent in Las Vegas, Nevada in support of this
12 matter."

13 Do you see that?

14 A Yes, sir.

15 Can I back up to your previous
16 question?

17 Q Sure.

18 A Yes. So the invoice would have been
19 related to the Nevada collection.

20 Q Okay. And your understanding is it
21 would not have related to Georgia?

22 A Correct.

1 Q Okay. And there are a couple of
2 folks on the e-mails here. One is
3 britrav@[REDACTED] Do you know who that is?

4 A I do not.

5 Q And then the AR@SullivanStrickler, is
6 that an account that you use for payments?

7 A Yes, sir.

8 Q All right. Come to the bottom page
9 ending in 41. There's an e-mail here from Paul
10 Maggio on December 5th, 2020. Do you see that?

11 A Yes, sir.

12 Q And here, Mr. Maggio writes to Jesse
13 Binnall, "The SullivanStrickler team has arrived in
14 Antrim County, Michigan and will be on-site at
15 9:00 a.m. tomorrow. It is our assumption that we
16 will be working under our existing agreement and
17 maintain the same daily rates/conditions of the
18 signed document for Nevada."

19 Do you see that?

20 A Yes, sir.

21 Q Then he goes on, "If you need a new
22 agreement, please let me know." Do you see that?

1 A Yes, sir.

2 Q And then Mr. Binnall responds that
3 same day, "I don't have any authority regarding
4 Michigan. Who is your campaign contact there?"

5 Do you see that?

6 A Yes.

7 Q The reference to campaign, that's the
8 Trump campaign?

9 A I don't know.

10 Q Who would you ask if you wanted to
11 know?

12 A Paul Maggio.

13 Q As we saw earlier, the retention
14 agreement with Sidney Powell was -- was dated
15 December 6, the next day after this e-mail.

16 Do you recall that?

17 A Yes, sir.

18 Q All right. So we come up to the page
19 ending in 40. Here, Mr. Maggio sends an e-mail to
20 Jim -- Jim Penrose, and others, saying, "Since
21 we've already begun work in Antrim County,
22 Michigan, it would be best for all parties if we

1 have a signed agreement in place. Attached is an
2 engagement agreement with you as the signee."

3 Do you see that?

4 A Yes, sir.

5 Q So do I understand correctly that
6 SullivanStrickler sent a new engagement agreement
7 specific for Michigan to Mr. Binnall on December 6,
8 2020?

9 A Yes, sir.

10 Q Okay. And then --

11 A Uh, wouldn't it have --

12 Q Or was it Jim Penrose?

13 A No, yeah, I think it would have went
14 to Jim Penrose.

15 Q Thank you.

16 A You're welcome.

17 Q You're right. Sorry, that's my
18 mistake.

19 The e-mail is to Jim Penrose, and it
20 indicates you as the signee. So there was an
21 agreement for Jim Penrose?

22 A Yes, sir.

1 Q Okay. Thank you.

2 And then Mr. Penrose responds on
3 December 6th, "Here is the signed engagement letter
4 from Sidney Powell, Defending the Republic. Please
5 send the invoice to Sidney and I'll get them paid."

6 Do you see that?

7 A Yes, sir.

8 Q Do you know what happened between the
9 proposed engagement agreement for Jim Penrose for
10 Michigan and getting an engagement letter signed by
11 Sidney Powell for Michigan? How that change was
12 made?

13 A I don't know.

14 Q Is the engagement letter that's
15 referenced here -- is it your understanding with
16 Ms. Powell -- that that's the one that we looked at
17 earlier?

18 A Can you rephrase that --

19 Q Yes.

20 A -- starting with the engagement
21 letter?

22 Q Yes, sorry. Let me ask a better

1 question.

2 A Yeah.

3 Q So here where Mr. Penrose indicates
4 that he's sending back a signed engagement letter
5 from Sidney Powell, is that, to your understanding,
6 the Sidney Powell Agreement that we looked at
7 earlier from December 6, 2020?

8 A Yes, sir.

9 Q Okay. And then Mr. Penrose goes on
10 in his e-mail, "Please do not communicate about any
11 additional forensics work in Arizona to the other
12 legal teams. Keep that in confidential channels
13 with me, Sidney, and Doug."

14 Do you see that?

15 A Yes, sir.

16 Q Do you understand "Doug" there refers
17 to Doug Logan?

18 A I do.

19 Q And Doug Logan is copied on the
20 e-mail here. Do you see that?

21 A I do, yes, sir.

22 Q Do you have any understanding as to

1 why SullivanStrickler was directed by the client
2 here not to communicate about additional forensics
3 work in Arizona to the other legal teams?

4 A I don't know.

5 Q Do you know who the other legal teams
6 were?

7 A No.

8 Q All right. So then Mr. Maggio
9 responds on December 6, 2020, acknowledged and
10 confirmed with respect to the signed engagement by
11 Ms. Powell, right?

12 A Yes, sir.

13 Q Okay. I'm sorry, I know this is
14 probably a bit tedious, but --

15 A No, it's not. I -- I completely
16 understand.

17 Q We'll work our way through on how we
18 end up in Coffee.

19 A No, that's fine.

20 Q All right. So then on December 8,
21 2020, Mr. Maggio sends an e-mail in the same
22 thread. "We will upload the system files from the

1 election management server collected from Antrim
2 County, Michigan to a secured FileShare site." The
3 second bullet also refers to Antrim County,
4 Michigan. The third bullet refers to payment for
5 the Clark County, Nevada collection.

6 Do you see that?

7 A Yes, sir.

8 Q Was there a collection done in
9 Nevada?

10 A No.

11 Q Okay. Then Ms. Powell responds,
12 "Nevada must be paid by the campaign." Do you see
13 that?

14 A Yes, sir.

15 Q Is that a reference to the Trump
16 campaign?

17 A I don't know.

18 Q Do you have any reason to believe it
19 would be another campaign?

20 A I do not.

21 Q And then she goes on, "I have seen
22 none of that information. I am authorizing payment

1 today from Michigan."

2 Do you see that?

3 A Yes, sir.

4 Q So Sidney Powell -- it was the Sidney
5 Powell Engagement that covered the Michigan work,
6 right?

7 A Yes, sir.

8 Q Okay. Then we get to December 21 --
9 sorry, back up.

10 A Yeah.

11 Q At the bottom, we're on December 10,
12 2020 from Brendan Sullivan at your firm. Do you
13 see that?

14 A Right here?

15 Q Right here.

16 A Yes, I got it.

17 Q Who is he?

18 A Brendan Sullivan is the CEO of
19 SullivanStrickler.

20 Q What was his role with respect to the
21 Sidney Powell or Jesse Binnall engagement?

22 A I don't know.

1 Q Okay. What was his role, if any,
2 with respect to Coffee County?

3 A I don't know.

4 Q Okay. So Mr. Sullivan responds on
5 December 10, "We received the Michigan on-site work
6 check this morning. Thanks for executing, Sidney."

7 Do you see that?

8 A Yes.

9 Q Then we jump ahead 11 days to
10 December 21, and Mr. Maggio sends an invoice as the
11 retainer for the Wayne County, Michigan work.

12 Do you see that?

13 A Yes, sir.

14 Q "Expectation is this will be paid
15 prior to work commencing." Do you see that?

16 A Yes, sir.

17 Q In that same day Sidney Powell
18 responds, "Copying Tricia with instructions to
19 transfer money promptly with understanding that I
20 and Phil Waldron and Todd and Conan will receive a
21 copy of all data immediately and have access to all
22 information needed immediately to complete their

1 assessment. And a complete copy of all analysis
2 you do is to be given to us as well."

3 Do you see that?

4 A Yes, sir.

5 Q Conan is Conan Hayes. Is that right?

6 A I believe so.

7 Q And what's your understanding as to
8 who he is?

9 A I don't know.

10 Q Okay. If you wanted to know, would
11 Mr. Maggio be the right person?

12 A Yes, sir.

13 Q Who is Todd?

14 A I don't know.

15 Q Who is Phil Waldron?

16 A I don't know.

17 Q And then the reference with
18 Ms. Powell, "A complete copy of all analysis that
19 you do," did SullivanStrickler, beyond just copying
20 data in Michigan, did it also do an analysis of
21 that data?

22 A No analysis was performed.

1 Q What about with respect to Coffee
2 County?

3 A No analysis was performed.

4 Q Okay. All right. If you look at the
5 bottom in this thread ending in -- the page ending
6 in 35, do you see there's an e-mail from Sidney
7 Powell on December 21, 2020?

8 A Yes, sir.

9 Q And she writes, "Thank you ALL!!"
10 "All" is in all caps with two
11 exclamation points. Do you see that?

12 A Yes, sir.

13 Q And then we come up now to January 7,
14 2021 at 10:31 a.m. Do you see that?

15 A Yes, sir.

16 Q This is an e-mail from Paul Maggio to
17 Sidney Powell, Tricia@[REDACTED] Jim
18 Penrose, Brendan Sullivan, and Doug Logan, right?

19 A Yes, sir.

20 Q And Tricia has the same e-mail,
21 @[REDACTED].com, as Sidney Powell, right?

22 A Yes, sir.

1 Q So do you understand that Tricia is
2 someone who works with Ms. Powell?

3 A Yes, sir.

4 Q Okay. Do you know who she is?

5 A I do not.

6 Q All right. And here now on
7 January 7th in the morning, the subject line of
8 the -- even though we're still on the same e-mail
9 thread, the subject line now refers to "Coffee
10 County, Georgia Forensics Engagement Agreement."

11 Do you see that?

12 A Yes, sir.

13 Q So the project number SSA1722 is
14 still the same project number that we have down in
15 the thread referring to Wayne County, Michigan
16 forensics.

17 Do you see that?

18 A Yes, sir.

19 Q So do I understand correctly that
20 SullivanStrickler -- the Coffee County work was
21 part of the same project as Michigan?

22 A Yes, sir.

1 Q Okay. Then here, Mr. Maggio writes
2 on the morning of January 7, "Per Jim Penrose's
3 request, we are on our way to Coffee County,
4 Georgia to collect what we can from the
5 election/voting machines and systems. As per our
6 existing agreement, I am attaching the invoice for
7 our initial retainer. Please let me know if there
8 are any questions or concerns."

9 Do you see that?

10 A Yes, sir.

11 Q The invoice that's attached there,
12 that's the one we looked at at the back here for
13 the Coffee County work. Is that right?

14 A I believe so.

15 Q Okay. So we -- we can see here that
16 sort of the evolution of the engagement went from
17 having an engagement with Mr. Binnall, with respect
18 to focusing on Nevada in the e-mail thread, to then
19 an engagement with Ms. Powell for Michigan, to
20 January 7, 2021, the Coffee County -- the team
21 traveling to Coffee County for collection.

22 Is that right?

1 A Yes, sir.

2 Q Okay. Does this thread or any of the
3 discussions or any of the prep that you did enable
4 you to offer any explanation for sort of how the
5 evolution happened that Georgia work went from a
6 Binnall retention to happening as part of a Sidney
7 Powell retention?

8 A I do not. I don't know.

9 Q Okay. Would that be a question for
10 Paul Maggio?

11 A Yes, sir.

12 Q Okay. When Mr. Maggio writes here,
13 "We are on our way to Coffee County, Georgia," the
14 "we" there are the four individuals from
15 SullivanStrickler we talked about before?

16 A Yes, sir.

17 Q Okay. So that's Ms. Naik,
18 Ms. Jackson, Mr. Nelson, and Mr. Maggio?

19 A Yes, sir.

20 Q Anyone else?

21 A No.

22 Q Okay. And then in the same thread,

1 we have an e-mail from Mr. Maggio at 4:10 p.m. on
2 January 7, 2021 providing an update that reads,
3 "Everything is going well here in Coffee County,
4 Georgia."

5 Do you see that?

6 A Yes, sir.

7 Q And then he writes, "Can we get some
8 sort of confirmation that the payment is being sent
9 this afternoon?"

10 Do you see that?

11 A Yes, sir.

12 Q So Ms. Powell had not yet paid, I
13 gather?

14 A Yes. And there is reference to a
15 retainer, so whether that was the retainer or the
16 project in its entirety, I don't know.

17 Q So it's -- it's possible that
18 Ms. Powell had paid the retainer and the balance
19 was due. Is that the idea?

20 A It's possible.

21 Q Okay. But you don't know to what
22 extent she had paid anything at all yet for Coffee

1 County?

2 A Yes. Yes, sir.

3 Q Okay. Then the afternoon, January 8,
4 2021, Mr. Maggio sends another update. "Everything
5 went smoothly yesterday with the Coffee County
6 Election. Everyone involved was extremely
7 helpful."

8 Do you see that?

9 A Yes, sir.

10 Q And this e-mail was -- he's
11 addressing Sidney, right?

12 A Yes, sir.

13 Q When he wrote, "Everyone involved was
14 extremely helpful," is it your understanding that
15 included individuals in the Coffee County office
16 who identified themselves as election officials?

17 A Yes, sir.

18 Q Okay.

19 A Well, the people that were there that
20 identified themselves as officials, yes, but there
21 were also people there that we wouldn't know -- I
22 hate to assume, but they presented themselves as

1 officials, even having an office there and things
2 like that.

3 Q Understood. And we'll walk through
4 the photos to identify those folks.

5 He further provides in his report on
6 the afternoon of January 8, "We are consolidating
7 all of the data collected and will be unloading it
8 to our secured site for access by your team.
9 Hopefully we can take care of payment today."

10 Do you see that?

11 A Yes, sir.

12 Q He's working hard to get paid.

13 A I noticed that. I guess when you
14 read it, it's --

15 Q No, I respect it.

16 A Thank you.

17 Q We all have clients.

18 And when he indicates, "We're
19 consolidating all the data collected," what is --
20 is that a general practice in those type of
21 engagements?

22 A It is. When there are multiple data

1 sources to be imaged, the destination of where you
2 put the images may be in different formats. So for
3 a server, it might be a big drive or, you know,
4 other devices, it may be smaller and staggered. So
5 the idea is to consolidate to create one localized
6 environment for our clients to have ease of access
7 to be able to pull the data down.

8 Q Mr. Maggio informs Ms. Powell that,
9 "The data will -- after consolidation will be
10 uploaded to our secured site for access by your
11 team."

12 Do you see that?

13 A Yes, sir.

14 Q And is that the online ShareFile
15 site?

16 A It is.

17 Q Okay. Is that a site that you guys
18 host or is that a cloud site?

19 A It is a cloud service.

20 Q Is -- is the company literally called
21 ShareFile?

22 A It is.

1 Q So that -- that sits in the cloud on
2 servers with ShareFile. It's not a local server
3 that your firm owns?

4 A We do not own that server.

5 Q Okay. And on the e-mail here, the
6 report that Mr. Maggio gives, again, it's addressed
7 to Sidney Powell, and it's copied to Tricia at her
8 firm. Do you see that?

9 A Yes, sir.

10 Q It's copied to Jim Penrose?

11 A Yes, sir.

12 Q It's copied to Brendan Sullivan at
13 your firm?

14 A Yes, sir.

15 Q It's copied to Doug Logan?

16 A Yes.

17 Q And then there's a new e-mail address
18 here, Magnolia64@[REDACTED]. Do you see that?

19 A Yes, sir.

20 Q Do you understand that's an e-mail
21 from a man named Scott Hall?

22 A I do not.

1 Q Okay. Are you familiar with Scott
2 Hall?

3 A I am.

4 Q How do you know Scott Hall?

5 A Based on discussions with the team
6 and his involvement in the collections.

7 Q What is your understanding of his
8 involvement with the collections?

9 A That he was on-site.

10 Q In Coffee County on January 7th --

11 A Yes, sir.

12 Q I'm sorry, let me just make sure I
13 get the question done.

14 A Yeah. Yeah. I'm sorry.

15 Q No, you're good. It's common.

16 All right. And did you discuss with
17 Mr. Maggio Mr. Hall's involvement in the Coffee
18 County project?

19 A Yes, sir.

20 Q What did Mr. Maggio have to say about
21 Mr. Hall's involvement?

22 A He was a senior --

1 MR. CROSS: Exhibit 9.

2 THE WITNESS: He had a senior role in
3 oversight, to some extent.

4 BY MR. CROSS:

5 Q So you had said earlier, and we see
6 in the e-mails, that Jim Penrose and Doug Logan
7 were principal points of contact for Coffee County,
8 right?

9 A Yes, sir.

10 Q When did Mr. Hall, Scott Hall, become
11 involved with the Coffee County project?

12 A I believe -- I don't know. I know he
13 was there on-site that day.

14 Q Okay.

15 A Anything prior to that, I'm not fully
16 aware.

17 Q Do you know why he was involved?

18 A I don't.

19 Q All right. Let me hand you what's
20 been marked as Exhibit 9. And we're looking at
21 Tab 16.

22

1 (Felicetti Deposition Exhibit Number 9
2 marked for identification.)

3 BY MR. CROSS:

4 Q Is Exhibit 9 one of the documents you
5 looked at in preparation for today?

6 A Yes, sir.

7 Q This is an e-mail -- sorry, strike
8 that.

9 This is a text thread between Paul
10 Maggio and Cathy Latham, right?

11 A Yes, sir.

12 Q And this comes from Paul Maggio's
13 phone, right?

14 A Yes, sir.

15 Q So the green is from -- are texts
16 that Mr. Maggio is sending and the black, those are
17 texts that Ms. Latham is sending, right?

18 A Can you repeat that? I'm sorry.

19 Q Yeah, sorry.

20 Since this came from Paul Maggio's
21 phone, the green texts are the ones that Mr. Maggio
22 sends, the black texts are ones that Ms. Latham

1 sends, right?

2 A Yes, sir.

3 Q Okay. So what we see here is on
4 January 7, 2021 at 11:09 a.m., Ms. Latham sends a
5 text to Mr. Maggio with an address in Douglas,
6 Georgia.

7 Do you see that?

8 A Yes, sir.

9 Q Are you aware that that's the address
10 for the Douglas local airport?

11 A I am not.

12 Q Okay. And then Mr. Maggio responds a
13 minute later, "Received. We will pick up Scott."
14 Do you see that?

15 A Yes, sir.

16 Q Did you understand that Scott Hall
17 flew into the Douglas, Georgia airport on the
18 morning of January 7 --

19 A Yes, sir.

20 Q -- of 2021?

21 Okay. And so what we see here is
22 Ms. Latham coordinating with Mr. Maggio on somebody

1 is picking up Scott Hall from the airport, right?

2 A Yes.

3 Q And then another minute later
4 Mr. Maggio writes back, "Better yet, have Eddie
5 pick up Scott. Our vehicle is full. We will meet
6 him there."

7 Do you see that?

8 A Yes, sir.

9 Q Who actually drove the team to
10 Maggio? Like literally drove the vehicle?

11 A Jim Nelson.

12 Q Do you know what kind of vehicle they
13 were in?

14 A I know he has a truck.

15 Q Okay. Like a pickup truck?

16 A Yeah. But I don't know if that's
17 what he drove. And as far as in that truck, there
18 were three people; so it was Jim, Paul, and
19 Jennifer.

20 Q And how did Ms. Naik get there?

21 A She had to drive and pick up a
22 Cellebrite, one of our forensic tools. So she had

1 to go and get it from, I believe, the office and
2 then meet everyone there.

3 Q So Ms. Naik separately drove to
4 Douglas?

5 A To -- not to Douglas. Is that where
6 Coffee County is?

7 Q Yes.

8 A Oh, then yes. Yes. Sorry.

9 Q That's okay.

10 And she drove there alone?

11 A Yes.

12 Q Did she drive back alone?

13 A Yes, sir.

14 Q And the other three rode back in
15 Mr. Nelson's vehicle?

16 A Yes, sir. Well, I believe his
17 vehicle. He drove.

18 Q Understood.

19 Okay. Then Ms. Latham writes back to
20 Mr. Maggio at 11:30 a.m., "How far out" -- sorry.

21 She writes back, "How -- how far out are you?"

22 Do you see that?

1 A Yes, sir.

2 Q And Mr. Maggio responds, "We are in
3 town waiting for Scott to let us know when to pull
4 in." Do you see that?

5 A Yes, sir.

6 Q Where did the team wait for the green
7 light from Scott Hall?

8 A I believe the parking lot.

9 Q Of the Coffee County elections
10 office?

11 A Yes, sir.

12 Q A pen with a light on it?

13 A Oh, it's very cool. I got it
14 yesterday. I'm sorry. I don't even use it. It
15 kind of tweaks me out a little, so I want to
16 apologize.

17 Q Oh, no, that's fine.

18 A I'm sorry.

19 Q Do I understand correctly, the team
20 was waiting for Mr. Scott Hall to give them
21 direction that it was time to go into the elections
22 office?

1 A Yes, sir.

2 Q Do you have any understanding of what
3 they were waiting for?

4 A Other than Scott being a senior --
5 sorry, a senior leader on this effort in Coffee
6 County, no.

7 Q When did the firm first start taking
8 direction from Scott Hall for Coffee County as
9 opposed to taking direction directly from Jim
10 Penrose, Doug Logan or Sidney Powell?

11 A It wasn't as much direction as
12 general, if you have an issue, you collect
13 everything type of deal.

14 Q Okay.

15 A Nothing is specific. And that was
16 provided by the other folks.

17 Q Since the Coffee County was done
18 pursuant to the engagement with Sidney Powell, was
19 it the understanding of SullivanStrickler that
20 Scott Hall was part of that Sidney Powell team, and
21 that's --

22 A Yes.

1 Q Okay. And what was the basis for
2 that understanding?

3 A I don't know.

4 Q Okay. And so, again, looking back at
5 the text between Mr. Maggio and Ms. Latham
6 coordinating the team's arrival and getting Scott
7 Hall there, do I understand correctly that
8 Ms. Latham was also a key point of contact for the
9 SullivanStrickler team with respect to the Coffee
10 County work?

11 A Yes, sir.

12 Q So she was one of the primary points
13 of contact for organizing and facilitating the work
14 in Coffee County?

15 A Yes, sir.

16 Q Oh, do you know who Eddie is?

17 A I do not.

18 Q Do you know how Scott Hall got from
19 the airport in Douglas to the Coffee County
20 elections office?

21 A I do not.

22 Q Do you know if someone traveled with

1 Scott Hall?

2 A I do not.

3 Q In your prep for this, did you learn
4 that Mr. Hall arrived at the elections office with
5 another person?

6 A I did not.

7 Q Okay.

8 A Yeah.

9 Q If we look at the next page,
10 January 7 at 11:42 a.m., this is a text from Cathy
11 Latham to Paul Maggio, sending a picture of Scott
12 Hall, right?

13 A I --

14 Q I'm sorry. No, no, I got that wrong.
15 I got that wrong. This is a separate text.

16 A Yeah.

17 Q This is a text from Scott Hall to
18 Paul Maggio sending a picture of himself?

19 A Yes, sir.

20 Q Got it. Okay.

21 And that's at 11:42 a.m. on
22 January 7th?

1 A Yes, sir.

2 Q Okay.

3 All right. Let me hand you

4 Exhibit 10.

5 A Yes, sir.

6 (Felicetti Deposition Exhibit Number 10

7 marked for identification.)

8 BY MR. CROSS:

9 Q Actually before you look at that, a
10 couple of questions that I forgot to ask you.

11 A Yes, sir.

12 Q So your standard practice is to --
13 you typically are engaged by lawyers or law firms
14 for your work. Is that fair?

15 A Yes.

16 Q And so the lawyers or law firms, they
17 will have a client that they are working on behalf
18 of for the work that they hire you for?

19 A Yes.

20 Q Who is Mr. Binnall's client for that
21 engagement?

22 A For?

1 Q For the engagement agreement that we
2 saw signed.

3 A I don't know.

4 Q Okay. And if you wanted to know, who
5 would you ask?

6 A Paul Maggio.

7 Q Okay. And who was Ms. Powell's
8 client for the engagement that we saw with respect
9 to Coffee County?

10 A I don't know.

11 Q Okay. Who would you ask?

12 A Paul Maggio.

13 MR. CROSS: Could we ask before the
14 deposition ends if he could ask Mr. Maggio who the
15 clients were?

16 MR. COLEMAN: Yeah, that's fine.

17 MR. CROSS: Okay. Thank you.

18 BY MR. CROSS:

19 Q And then you mentioned Ms. Naik
20 picked up a -- is it a Cellebrite kit?

21 A Yeah, Cellebrite. Yeah, a dongle
22 kit.

1 Q What is that used for?

2 A It's used for forensically capturing
3 certain devices.

4 Q What types of devices?

5 A Mobile typically, iPads.

6 Q Was that needed for the poll pads in
7 Coffee County?

8 A It was.

9 Q Where did Ms. Naik get that kit?

10 A I believe at our office.

11 Q In Atlanta?

12 A Yes, sir.

13 Q So that's -- that's a standard device
14 that you guys have?

15 A Yes.

16 Q Okay.

17 All right. Take a look at
18 Exhibit 10, if you would. You, yourself, have not
19 been on-site in the Coffee County elections office?

20 A I have not been on-site.

21 Q Okay. So what we have here, we had a
22 deposition with the Coffee County Board of

1 Elections yesterday on this. These -- these are
2 screenshots from surveillance video that was
3 produced by Coffee County to us.

4 A Okay.

5 Q So what it is, there is a camera
6 sitting outside the front door of the elections
7 office and it shows people going in and out of the
8 elections office.

9 Do you understand that?

10 A Yes, sir.

11 Q Okay. So let me just see -- there
12 are some people I want to ask you about.

13 MR. COLEMAN: I was going to say I
14 don't think it's uploading to the FileShare.

15 MR. CROSS: The photos?

16 MR. COLEMAN: Yeah.

17 MR. CROSS: Yeah, it's a little bit
18 slow, I think, because it's a very large document.

19 Do we happen to have an extra one?

20 MR. SPARKS: We don't.

21 MR. CROSS: Okay.

22 MR. SPARKS: I'm getting ready to --

1 MR. CROSS: Yeah, it's a very, very
2 large -- yeah.

3 We can go off the record for a
4 moment.

5 VIDEOGRAPHER: The time is 11:16 a.m.
6 We are off video record.

7 (Recess from 11:16 a.m. to 11:17 a.m.)

8 VIDEOGRAPHER: The time is 11:17 a.m.
9 We are back on video record.

10 BY MR. CROSS:

11 Q Before we look at the picture, we
12 talked earlier that Ms. Latham was one of the
13 principal points of contact organizing the Coffee
14 project. Do you recall that?

15 A Yes, sir.

16 Q Ms. Latham was literally the person
17 who welcomed Mr. Maggio and his team at the
18 elections office the morning of January 7th, 2021.
19 Is that right?

20 A Yes, sir.

21 Q And when they arrived, she presented
22 herself as a Coffee County elections official. Is

1 that right?

2 A Yes, sir.

3 Q If we look at page 33 in Exhibit 10
4 in the -- the screenshots of the video provided by
5 Coffee County, you'll see here Mr. Maggio is in the
6 grey sweater, right?

7 A Uh-huh. Yes, sir.

8 Q And Jim Nelson is next to him in the
9 khaki pants?

10 A Yes.

11 Q Jennifer Jackson is in front in the
12 pink jacket?

13 A Yes.

14 Q And do you understand that's Cathy
15 Latham escorting them into the building?

16 A I don't know.

17 Q Okay. That's fine.

18 Then if we come to the next page, we
19 see the same woman with grey hair holding the door
20 open and Mr. Maggio and Mr. Nelson are walking in,
21 right?

22 A Yes, sir.

1 Q And this is at 11:43 a.m. on
2 January 7, 2021, right? If you look at the top,
3 the timestamp.

4 A Oh, okay. Yes, sir.

5 Q All right. Flip to, it looks like,
6 page 38. So here you have -- do you see the
7 timestamp just above the photo, January 7, 2021 at
8 11:50 a.m.?

9 A Yes, sir.

10 Q We have the same woman with grey
11 hair. Do you see her?

12 A Yes, sir.

13 Q She's escorting two individuals into
14 the building, right?

15 A Yes, sir.

16 Q Do you recognize the one behind her
17 as Scott Hall, the person that we saw in the
18 picture before?

19 A I do.

20 Q Okay. And then do you know who the
21 second individual is coming in with Mr. Hall and
22 Ms. Latham?

1 A I do not.

2 Q If you wanted to know who that
3 individual was, who would you ask?

4 A One of the team members from
5 SullivanStrickler that were there.

6 MR. CROSS: Amanda, if we could get
7 that answer before the end of the deposition?

8 MS. CLARK-PALMER: Yes.

9 MR. CROSS: Thank you.

10 BY MR. CROSS:

11 Q All right. Now come to page 42.

12 MR. SPARKS: One second. I need this
13 in an e-mail, I think, maybe in order to do that.

14 MR. CROSS: Yeah, we will do that.
15 E-mail Jenna. I think we may have to do it as a
16 FileShare, an FTP, because it's big, but --

17 MR. SPARKS: I will.

18 MR. CROSS: Thanks.

19 MR. RUSSO: Can you put on the record
20 the page number for that?

21 MR. CROSS: In the exhibit?

22 MR. RUSSO: Yeah. The page -- the

1 page that you're looking at there. You may have
2 sent it, but I --

3 MR. CROSS: Page 38, yeah. I'm
4 sorry.

5 BY MR. CROSS:

6 Q All right. Flip to page 42. So here
7 we have Mr. Nelson and Mr. Maggio walking out of
8 the building at 12:15 p.m. on January 7, right?

9 A Yes.

10 Q And then again at 12:17 p.m.,
11 January 7, we have Mr. Maggio and Mr. Nelson coming
12 back in, right?

13 A Yes, sir.

14 Q Mr. Maggio is carrying a black bag?

15 A Yes.

16 Q What was in that bag?

17 A Forensic collection materials,
18 devices.

19 Q Standard devices you would --

20 A Standard -- industry-standard
21 forensic tools.

22 Q And do you see that Mr. Nelson is

1 wheeling some kind of case in?

2 A Yes, sir.

3 Q What was in that case?

4 A Forensic collection tools.

5 Q So this is something Mr. Nelson

6 brought in with him?

7 A Yes, sir.

8 Q All right. Did the SullivanStrickler
9 team take any equipment or devices from the Coffee
10 County office when they left?

11 Sorry, let me ask a better question.
12 Obviously it's a really broad one. Let me ask a
13 better question.

14 Did the SullivanStrickler team take
15 any of the -- did they take any equipment or
16 devices from Coffee County when they left the
17 Coffee County office that they did not themselves
18 bring in?

19 A They did not.

20 Q So, for example, did they take a BMD
21 with them, the vote -- the touchscreen voting
22 devices?

1 A No, sir.

2 Q So the only thing they took out were
3 any devices they brought in, plus the data that
4 they copied from inside the office?

5 A Yes.

6 Q All right. Flip to page 51. So
7 we're at 12:56 p.m. on January 7, 2021. Do you see
8 that?

9 A Yes.

10 Q So Mr. Nelson is holding a Coffee
11 County elections office door open. Mr. Maggio is
12 standing with him, right?

13 A Yes, sir.

14 Q Who's the woman they're talking to?

15 A That is Karuna Naik.

16 Q And she has a bag also, right?

17 A Yes, sir.

18 Q Did she also -- she brought in a
19 Cellebrite kit, right?

20 A Yes, sir.

21 Q Did she bring any other devices?

22 A She may have.

1 Q Okay. But she also did not take
2 anything out of the office that she, herself, or
3 the team did not bring in?

4 A Correct.

5 Q Other than the data?

6 A Yes, sir.

7 Q Okay.

8 All right. Flip to page 55. So now
9 we're at January 7, 2021 at 1:19 p.m. Cathy Latham
10 is standing at the door talking to a man in a black
11 hat.

12 Do you see that?

13 A Yes, sir.

14 Q Do you know who that is?

15 A I do not.

16 Q And then if you come back to page 57,
17 the same man, it looks like he's bringing in
18 takeout containers at 1:23 p.m.

19 Do you see that?

20 A Yes, sir.

21 Q Someone brought lunch in for the team
22 so they could continue working in the office,

1 right?

2 A Yes, sir.

3 Q Did Scott Hall pay for the lunch?

4 A I don't know.

5 Q Do you know who took care of lunch in
6 terms of going to get it, organizing it?

7 A I don't.

8 Q Will you look at page 60?

9 There's a man coming in, grey hair,
10 grey beard, January 7, 2021 at 1:39 p.m. Do you
11 recognize him as Ed Voyles?

12 A No.

13 Q Do you know the name Ed Voyles?

14 A I do not.

15 Q Do you know the name Eric Chaney?

16 A I know the name Eric Chaney.

17 Q And do you understand that Eric
18 Chaney was a member of the Coffee County Elections
19 Board at the time of the Coffee County collection?

20 A I did not.

21 Q During the time that the
22 SullivanStrickler team was in the Coffee County

1 election office on January 7, you're aware that
2 there was at least one member of the Coffee County
3 Elections Board who was there for that work, right?

4 A Yes, sir.

5 Q And to the best of your
6 understanding, was Eric Chaney that person or do
7 you not know?

8 A I don't know.

9 Q All right. Go to page 62, January 7,
10 2021 at 2:21 p.m. There's a young man coming in in
11 a red hat. Do you know who that is?

12 A I do not.

13 Q All right. Go to page 72. So if you
14 look at 72 and 73 together, January 7, 2021,
15 between 4:46 and 4:49 p.m., here we see Scott Hall
16 and the individual who came in with him. We see
17 them leaving the elections office, right?

18 A Yes.

19 Q The individual that came in with him
20 has a blue backpack, right?

21 A Yes.

22 Q Do you know what was in that

1 backpack?

2 A I do not.

3 Q Mr. Hall leaves with a black backpack
4 and a brown bag of some sort. Do you see that?

5 A Yes, sir.

6 Q Do you know what was in those bags?

7 A No.

8 Q Do you know whether Mr. Hall or his
9 colleague took anything out of the Coffee County
10 elections office that they did not bring in?

11 A No.

12 Q You just don't know?

13 A I don't know.

14 Q Would that be -- who would you ask if
15 you wanted to know?

16 A One of the team members.

17 Q Okay.

18 MR. CROSS: If we can get an answer
19 to that, too.

20 MS. CLARK-PALMER: Who were the
21 people you said? I missed that. Who are the
22 people you want to know whether or not they took

1 anything back?

2 MR. CROSS: Well, the question would
3 be whether any -- whether SullivanStrickler knows
4 if anyone took anything out of the elections office
5 that they did not bring in.

6 MS. CLARK-PALMER: Okay.

7 MR. CROSS: And, in particular,
8 whether anyone took any of the voting equipment out
9 of the office. Thank you.

10 BY MR. CROSS:

11 Q All right. Flip to pages 76 and 77.
12 So here we have someone coming into the elections
13 office, January 7, 2021 at 5:24 p.m. Do you know
14 who that is?

15 A I do not.

16 Q But on January 7, 2021, the only
17 people that SullivanStrickler had in the office
18 were the four we've talked about?

19 A Yes, sir.

20 Q Okay. Flip to page 80. The two
21 individuals in baseball caps coming into the office
22 at 6:53 p.m. on January 7, 2021, do you know who

1 those folks are?

2 A I do not.

3 Q Flip to pages 84 and 85. So here we
4 are January 7, 2021 at 7:42 and 7:43 p.m., and this
5 is when we see the SullivanStrickler team leave,
6 right?

7 A Yes, sir.

8 Q And on page 72, it's Paul Maggio
9 and -- and Jim Nelson leaving, right?

10 A Correct.

11 Q It looks like they're leaving with
12 the same bags they brought in, right?

13 A Yes, sir.

14 Q And then in page 85, we see Ms. Naik
15 and Ms. Jackson leaving, right?

16 A Yes, sir.

17 Q Are they leaving with the same bags
18 they brought in?

19 A Yes.

20 Q All right. Flip to the last page,
21 87. So now we're at January 7, 2021 at 7:49 p.m.
22 There's a white car out front. Do you see that?

1 A Yes, sir.

2 Q Do you know whose vehicle that is?

3 A I do not.

4 Q Not one of the vehicles that anyone
5 from SullivanStrickler drove, or you don't know?

6 A It's not their vehicles that I know
7 that they own.

8 Q Okay.

9 A Do you know what I mean?

10 Q Yes.

11 A Okay.

12 Q Yes. That's good.

13 Did anyone from SullivanStrickler
14 ever go back to Coffee County after January 7 to do
15 any additional work?

16 A No.

17 Q So just the one day?

18 A One day.

19 Q Let me show you Exhibit 11.

20 (Felicetti Deposition Exhibit Number 11
21 marked for identification.)

22 THE WITNESS: Do you mind if I take a

1 bio break? Is that okay?

2 MR. CROSS: No. Any time you want.

3 VIDEOGRAPHER: The time is 11:31 a.m.

4 We are off video record.

5 (Recess from 11:31 a.m. to 11:39 a.m.)

6 VIDEOGRAPHER: The time is 11:39 a.m.

7 We are back on video record.

8 MR. CROSS: Okay. Do you -- does he
9 have 12? Oh, he does. Okay.

10 THE WITNESS: Yeah. Yeah.

11 BY MR. CROSS:

12 Q Grab Exhibit 20, if you would.

13 MR. SPARKS: Exhibit 11.

14 BY MR. CROSS:

15 Q I'm sorry, Exhibit 11. It's the tab
16 numbers. Flip to -- wait a minute, are there not
17 page numbers on this one? There's not. Okay.

18 So flip like two full pages and
19 you'll see a picture of a young man, it looks like,
20 in blue pants, blue sweater, January 8, 2021 at
21 8:53 a.m.

22 Do you see that?

1 A Yes, sir.

2 Q He's walking out holding some type of
3 equipment. Do you see that?

4 A Yes.

5 Q And then at 8:53 a.m., he's heading
6 back into the office in a black mask. Do you see
7 that?

8 A Yes, sir.

9 Q Okay. And he's leaving again, it
10 says 8:55 a.m., with some equipment on sort of a
11 rolling cart. Do you see that?

12 A Yes, sir.

13 Q Do you know this individual?

14 A No.

15 Q Do you have any reason to believe one
16 way or the other whether this person is affiliated
17 with SullivanStrickler?

18 A That there would be -- well,
19 there's -- I don't know how to answer that. Can
20 you rephrase the question?

21 Q Yeah. Sorry, that's not good.
22 That's a -- that's a lawyer question.

1 A Yeah.

2 Q Is this person affiliated with
3 SullivanStrickler?

4 A No.

5 Q Do you know what equipment he's
6 rolling out?

7 A It looks like a printer maybe, but I
8 can't -- no.

9 Q You don't know?

10 A No.

11 Q That's fine.

12 MR. CROSS: All right. And we were
13 looking at, it looks like, pages 4, 5, and 6 of
14 Exhibit 11, just for the record.

15 BY MR. CROSS:

16 Q Okay. The photos that I've shown you
17 today from the security footage outside of the
18 office, have you seen those before today?

19 A I have not.

20 Q Did anyone on the SullivanStrickler
21 team try to evade any of the surveillance cameras
22 at the elections office when they were doing their

1 work?

2 A No.

3 Q And would they have had any reason to
4 do that?

5 A No, sir.

6 Q Because the firm's understanding at
7 the time, and still today, is that it had all the
8 legal rights to do what it was doing?

9 A Yes, sir.

10 Q All right. Let me hand you
11 Exhibit 12.

12 (Felicetti Deposition Exhibit Number 12
13 marked for identification.)

14 BY MR. CROSS:

15 Q All right. So take a moment, if you
16 need, and flip through Exhibit 12.

17 Do you recognize these as photos that
18 were produced by Mr. Maggio and that were taken by
19 the team on January 7, 2021 in the elections
20 office?

21 A Yes, sir.

22 Q Okay. And we talked before earlier

1 that Ms. Jackson, part of her responsibility was to
2 document the work, including taking photos.

3 Do you recall that?

4 A Yes, sir.

5 Q Did she take these photos?

6 A Yes.

7 Q Is your understanding that she took
8 all of the photos?

9 A Yes.

10 Q Did anyone else with
11 SullivanStrickler take any photos or video?

12 A No.

13 Q Okay. Did anyone else in the room --
14 sorry, strike that.

15 Did anyone else who was on-site in
16 Coffee County on January 7, 2021 take any photos or
17 video?

18 A Not that I know of. I don't know.

19 Q Did you discuss that specifically
20 with any of the team members?

21 A I did.

22 Q And no one on the team was aware of

1 anyone else taking photos or video?

2 A I was directed to Jennifer Jackson
3 whenever it came to that.

4 Q All right. Is it fair to say the
5 team's understanding or recollection from the
6 events was that she was the only one who took
7 photos and video?

8 A Yes, sir.

9 Q Okay. All right. Let's start with
10 the first page.

11 A Sure.

12 Q And it's got this little production
13 number ending in 236. These are pictures of
14 CompactFlash drives, right?

15 A Yes, sir.

16 Q And each CompactFlash drive has a
17 little note next to it with the project number
18 SSA1722, right?

19 A Yes, sir.

20 Q And then below the project number
21 there's other information. What is the information
22 that's recorded on each of those notes?

1 A The CF number is a tracking code.
2 And the -- the word next to it or -- yeah, the word
3 to the right of the CF number is the label of the
4 machine, the device that was -- that the cards were
5 removed from.

6 Q Okay. So each of the CompactFlash
7 drives, when the team arrived, was installed in a
8 device. The team pulled the CompactFlash out of
9 the device, copied it. Is that right?

10 A No.

11 Q Oh, sorry. I'll tell you what, let
12 me just ask. Walk me through the steps the team
13 took to copy the -- the CompactFlash drives that we
14 see in this picture.

15 A As I understand it, the CompactFlash
16 disks were given to Karuna to image. And I can
17 walk you through that process if you want to hear
18 it.

19 Q We will in a moment.

20 A Okay.

21 Q Who gave her the CompactFlash?

22 A It would have been -- there were a

1 number of people. It would have been either Misty
2 Hampton -- I would say Misty Hampton, because she
3 directed, "Grab this, get this, get that, get
4 this."

5 Q Misty Hampton was the elections
6 supervisor in Coffee County at the time?

7 A As I understand it, yes.

8 Q Okay. And you anticipated where I
9 was going to go.

10 Did anyone beyond Ms. Hampton direct
11 the SullivanStrickler team what to copy?

12 A Yes, I believe so.

13 Q What's your understanding about
14 others who gave direction?

15 A Misty directed the larger percent,
16 but as I understand it, Cathy Latham also provided
17 direction on what was required for collection. And
18 Scott Hall had said, "Get -- are you sure you're
19 getting everything? Are you getting everything?"
20 So that was interpreted as, "Make sure you get
21 everything that you can."

22 Q Okay. And what was the idea for the

1 SullivanStrickler team? Essentially if there was a
2 device in the office that had data on it, the
3 team's task was to extract that data to the extent
4 they could?

5 A Yes, sir.

6 Q So looking back at the first picture
7 in Exhibit 12, so let's just take the fourth one
8 down on the left. So you've got the project number
9 and then "CF04." And then there's that Braxton-2."
10 Or what is that word?

11 A It looks -- it does look like Braxton
12 or Broxton, but that information also would be
13 tracked in the chain-of-custody log that was
14 produced.

15 Q And do you see next to that it looks
16 like there's one that refers to Ambrose?

17 A Yes, sir.

18 Q Do you understand that -- that the
19 references here on these notes correlate to voting
20 precincts in Coffee County, or do you know?

21 A I do not. We reference them as just
22 labeled.

1 Q And if we look at the Ambrose one, if
2 you look at the CompactFlash drive, it says
3 "Ambrose ICP" on it, right?

4 A Yes, sir.

5 Q And so you're just capturing that
6 information on the note?

7 A That's exactly right.

8 Q And "ICP," do you understand that
9 that refers to a Dominion printer or -- well,
10 strike that.

11 Do you understand that "ICP" refers
12 to a printer that is used in a voting precinct with
13 the vote -- with the ballot-marking device?

14 A I do not.

15 Q So you mentioned earlier that
16 Ms. Naik did the imaging. Walk me through the
17 steps that she took to image the CompactFlash
18 drives.

19 A Sure.

20 We bring a laptop with us, a
21 SullivanStrickler laptop. And on that laptop is a
22 bootable thumb drive that contains an operating

1 system that boots the laptop in the means at which
2 to begin the collection of targeted data without
3 leaving a footprint.

4 So, essentially, the process is S2
5 laptop with a bootable thumb drive that contains
6 not only an operating system that allows us the
7 collection, but also software called -- we use DFIR
8 scripts, which is used to help create the forensic
9 images.

10 And DFIR scripts is an
11 industry-standard tool that's utilized. It's
12 D-F-I-R, if you're interested. We should have it
13 in here, let's see -- so DFIR scripts, we
14 utilize -- and what it does is when the machine,
15 the S2 laptop boots up, it'll boot off this thumb
16 drive that we have and then recognize that there is
17 something connected to it, like a thumb drive.

18 And we use DFIR scripts, and it
19 points to the thumb drive to be -- or the drive or
20 CompactFlash to be imaged, forensically imaged. So
21 you point to a target to be imaged and then
22 subsequently attached to that laptop is a

1 destination drive.

2 So if you're visualizing the process,
3 laptop, bootable into Linux using DFIR scripts,
4 target, which is one of these, or a thumb drive,
5 and then over here is a one-terabyte hard drive.
6 So they're all labeled and foldered based on the
7 images that are created.

8 During that process, the images that
9 are created, the forensic images of those devices
10 are verified. So basically what it'll do, it will
11 go in and say, "All right. We've collected --
12 we've imaged a pristine copy of the target device."
13 In this case, a flashcard, and there's a hash value
14 that's created. And then it verifies that the --
15 that what we have done is pristine. It's an exact
16 representation of what is being collected gets put
17 to a one-terabyte disk.

18 Does that make sense?

19 Q Yeah.

20 Is that essentially the same process
21 that was taken for all of the forensic collection
22 in Coffee County?

1 A No.

2 Q Okay. What equipment or devices was
3 that process used for?

4 A For what I just spoke about?

5 Everything, all the thumb drives,
6 everything but the EMS server and the -- the
7 tablets. Those are different devices or
8 different -- I'm sorry, different technologies
9 utilized to capture that information or to image
10 those.

11 Q So the EMS server was different and
12 the tablets were different?

13 A Yes, sir.

14 Q Okay. What about laptops?

15 A The same -- the same tool was
16 utilized.

17 Q As the CompactFlash?

18 A Yeah.

19 Q Okay. Walk me through the process
20 that was used for the EMS server.

21 A Okay. The EMS server -- I take it
22 back. Hold on. I take it back. Can we go back?

1 Q Sure.

2 A I apologize.

3 I think we actually utilized the same
4 exact methodology for the EMS server, but the
5 difference was -- the one difference was, it was
6 running -- yeah, it was the same exact process. I
7 apologize. But it was using what's called RAID.
8 So they had multiple hard drives within the server.

9 So we had to collect those
10 individually as mirrored drives. So the process
11 was identical, but the -- the technologies were
12 identical, but the process was a little bit
13 different.

14 Q For the EMS server?

15 A Yes, sir.

16 Q Okay.

17 A And then the iPads --

18 Q And before we get to that --

19 A Yeah.

20 Q -- the end result of those processes,
21 though, is the same, which is to get this, what
22 you've referred to as, a pristine copy that doesn't

1 alter the data or leave traces on the original
2 equipment?

3 A Yes, sir.

4 Q Okay. And what was the process for
5 the tablets, the poll pads?

6 A That's where we would utilize
7 Cellebrite, which again is an industry standard.
8 That was the dongle, the tool, that was picked up
9 by Karuna when she was in her own car.

10 And so we would attach a dongle to
11 our laptop, connect it to the tablet, and then --
12 systematically, it's the same approach. Different
13 technology but collects the same information. And
14 creates that pristine image without a footprint.

15 Q Okay. Are you familiar with a device
16 in the Dominion System in the Coffee County
17 election office that's referred to as the ICC, a
18 central scanner?

19 A I am. I'm aware of a scanner, yes.

20 Q Was an effort made to copy data from
21 the scanner -- or the computer attached to the
22 scanner that sat in the same room as the EMS

1 server?

2 A Yes.

3 Q And was data captured from those --

4 A I believe it was, yes.

5 Q Using one of these two processes?

6 A Yes, sir.

7 Q The EMS server has a computer
8 attached to it. Do you recall that?

9 A Yes, sir.

10 Q Was the collection for the EMS
11 server, was it done through the computer attached
12 to the server or did they connect it directly to
13 the server itself or both?

14 A So can you -- I'm sorry, can you
15 repeat the question?

16 Q Sure.

17 So there's two devices associated
18 with the EMS server. There's the server itself and
19 then there's a computer that connects to the
20 server, right?

21 A Yes.

22 Q Okay. Did they image the computer

1 connected to the server?

2 A No. They booted the server up using
3 a bootable thumb drive that doesn't leave a
4 footprint and then pushed it off using DFIR
5 scripts.

6 Q And did they plug the thumb drive
7 directly into the server?

8 A I believe they did, but I don't know
9 100 percent.

10 Q Okay.

11 A And that's --

12 Q All right. I referred to an ICP
13 earlier. I misspoke on what that is.

14 Are you aware that in the
15 Dominion's -- well, let's back up for a moment.

16 You don't go to Georgia obviously?

17 A I do not.

18 Q You live in Rhode Island?

19 A Yes, sir.

20 Q How do you -- what's the mechanism of
21 voting in Rhode Island at the polls?

22 Do you write something by hand? Do

1 you use a computer?

2 A By hand.

3 Q And so in Rhode Island, if you go to
4 vote, you get a paper ballot, you mark that paper
5 ballot by hand, and then what do you do with it?

6 A We put it into a machine, a scanner.

7 Q Okay. Have you seen what are called
8 ballot-marking devices that are used in Georgia?

9 A No.

10 Q Okay. Are you aware that the voting
11 system in Georgia, unlike the hand-marked paper
12 ballot that you use in Rhode Island, voters vote on
13 a touchscreen that's connected to a printer, that
14 printer prints a ballot, and that ballot is then
15 scanned?

16 A Yes, sir.

17 Q And that ballot is scanned if they're
18 voting on election day on a scanner in the
19 precinct?

20 A Yes, sir.

21 Q And that is referred to as an ICP.
22 Have you heard that?

1 A Yes, sir.

2 Q Okay. And -- and the -- the
3 SullivanStrickler team on January 7th copied data
4 from scanners, too, right?

5 A Yes, sir.

6 Q And that's both the central scanner
7 that sits in the office and individual scanners
8 that are used at precincts?

9 A Yes, sir.

10 Q And these ballot-marking devices, the
11 touchscreens, the team also collected data from
12 those as well, right?

13 A I believe so. They were the big
14 touchscreens?

15 Q Yes.

16 A I believe so. And I -- and I -- I
17 believe so. I think they were running Android or
18 something, OS on them, but I don't know
19 specifically how they were collected.

20 Q Okay.

21 MR. CROSS: If we could confirm that
22 before the deposition is over.

1 BY MR. CROSS:

2 Q Have you heard the ballot-marking
3 devices, the touchscreens, referred to as a
4 Dominion ICX?

5 A I have not.

6 Q Okay. But, again, the -- the
7 directive leading into the Coffee County project
8 and on-site was collect data from any device in
9 this office that has data?

10 A That we were directed to collect
11 from.

12 Q Okay. All right.

13 All right. So flip to -- going back
14 to Exhibit 12 --

15 A Sure.

16 Q -- the next photo. This is a picture
17 of a thumb drive. It's black, DataStick Pro, TD
18 01. Do you see that?

19 A Yes, sir.

20 Q And this is one of the thumb drives
21 that the team was directed to copy, right?

22 A Yes, sir.

1 Q And then if we go to the next page
2 ending in 238, are these more CompactFlash drives?

3 A They are.

4 Q Okay. And these were copied --

5 A Yes, sir.

6 Q -- from the Coffee County office?

7 A Yes, sir.

8 Q Okay. Page ending in 239, these are
9 more CompactFlash drives copied from the office?

10 A Yes, sir.

11 Q If we go to 240, we have a picture of
12 Jim Nelson on the left, right?

13 A Yes.

14 Q Karuna Naik on the right?

15 A Yes, sir.

16 Q And do you understand they're sitting
17 in the small room that had the EMS server and the
18 central scanner in it?

19 A Yes, sir.

20 Q The computer that Mr. Nelson is
21 looking at, do you know if that's the computer
22 that's attached to the EMS server or is that one

1 that they brought with them?

2 A I don't know.

3 Q Do you know what's running on the
4 screen there?

5 A I can't really tell. It looks like
6 command lines, so it may be a collection device.

7 Q Okay.

8 A It may be one of ours.

9 Q If you look at the picture, do you
10 see there is a -- it looks like a desktop computer
11 that's standing up just over Mr. Nelson's right
12 shoulder?

13 A Yes, sir.

14 Q And you see that there's a tag, it
15 looks like, attached to maybe a thumb drive that's
16 plugged into that computer?

17 A Yes.

18 Q Do you understand that to be a device
19 that you guys brought with you to collect data?

20 A I do not.

21 Q Okay. So you don't know what that is
22 then?

1 A I don't.

2 Q Okay. And then do you know what
3 Ms. Naik is holding in her hand?

4 A It -- I can guess, but I don't know.
5 It looks like a collection laptop.

6 Q Okay.

7 All right. Go to the page ending in
8 241. These are thumb drives that SullivanStrickler
9 collected on-site in Coffee County?

10 A Yes, sir.

11 Q Go to 242. This is a Dell laptop
12 that SullivanStrickler collected from on-site?

13 A Yes, sir.

14 Q Do you know what this laptop was used
15 for?

16 A I do not.

17 Q Would that be a question for the
18 team?

19 A It would be, yeah. I mean, often
20 when we're brought in to image devices, it's --
21 you -- we're pointed, "Okay. Here, collect these.
22 Image these, image this, image that, image these."

1 So, you know, there's -- that's why when we see
2 something like this, we just forensically image it,
3 code it, and, you know, verify it, so . . .

4 Q The point being the team may not
5 always know what the device is used for. They're
6 just pulling data?

7 A Exactly. Well, not pulling it,
8 imaging it.

9 Q Well, I've oversimplified your --
10 your proceedings.

11 A Thank you. You're good.

12 Q All right. Go to 243. Do you
13 understand that to be a picture of the bottom of
14 the laptop that's in 242?

15 A Yes, sir.

16 Q Okay. All right. Now go to 244. So
17 this is another picture of the EMS server room that
18 we saw just a moment ago that Mr. Nelson and
19 Ms. Naik were sitting in.

20 Do you see that?

21 A Yes, sir.

22 Q And if you look in the screen of this

1 computer on the right --

2 A Yes.

3 Q -- that looks to be a reflection of
4 Ms. Jackson taking the photo, right?

5 A Yes, sir.

6 Q And then if you look now, you've got
7 a clearer image --

8 A Yeah.

9 Q -- of -- of this desktop standing up
10 with the device of the yellow tag. The device with
11 the tag on it, is that consistent with your
12 practice, to use a device like that that would have
13 a tag on it indicating what it is?

14 A It is.

15 Q Okay. So is it your best-educated
16 guess that that device is something you guys
17 brought with you to collect data?

18 A Yes. My educated guess here seems
19 that that is a bootable thumb that we're using to
20 forensically grab the data from these machines --
21 to image the data from these machines on these USB
22 drives or one of the USB drives that are attached.

1 Q And, again, what that bootable thumb
2 does is allows the team to boot up the computer,
3 here the EMS server, using the thumb drive to boot
4 it up rather than using the -- the software
5 operating system on the server itself?

6 A Yes, sir.

7 Q Okay. And if we look, there's a
8 black external hard drive here that looks like it's
9 attached via USB cord.

10 Do you see that?

11 A Yes, sir.

12 Q And is that a device that you guys
13 would have brought with you?

14 A It could very well be a destination
15 drive. We use those, yes.

16 Q So that's the type of device you
17 would use for data collection like we see here?

18 A Yes, sir.

19 Q And so the idea is the thumb drive
20 would be used to boot up the device and then the
21 data would transfer to an external hard drive like
22 we see here?

1 A Yes, sir.

2 Q And then do you see this device to
3 the left of the computer, it's white on the front
4 and black on the side?

5 A Oh, yes, sir.

6 Q Do you know what that is?

7 A I can guess. It looks like a
8 hardware capture device, but I can't really tell.

9 Q So you don't know whether that's a
10 device that you guys brought or not?

11 A It could be --

12 Q Okay.

13 A -- but I don't know with a hundred
14 percent certainly.

15 Q And you've got a little bit clearer
16 image of the screen of the computer here. Do you
17 know whether what's running there is part of the
18 collection?

19 A It does look that way, yes.

20 Q All right. Go to 245. Wait, did I
21 go backwards? No, that's right. Go to 245. Did I
22 go backwards? Sorry. All right. These are --

1 A That's okay. I don't know why these
2 are upside down.

3 Q 245, these are more CompactFlash
4 drives that the team copied on-site in Coffee
5 County?

6 A Yes, sir.

7 Q And then 246 is another picture of
8 Mr. Nelson and Ms. Naik in the EMS server room
9 doing the collection?

10 A Yes, sir.

11 Q 247, I think we may have looked at
12 this earlier. Well, let me -- 247, this is a
13 picture in the Coffee County election office,
14 right?

15 A Yes, sir.

16 Q Do you know -- the computer that's
17 seen here, do you know if that's a computer that
18 you guys brought or something that you're
19 collecting from?

20 A It looks like ours.

21 Q All right. Just based on the
22 information that you can see here?

1 A Yeah, based on the spreadsheet,
2 what's in document recovery, based on the task bar,
3 but I'm not 100 percent certain.

4 Q Okay. And you --

5 A I could -- it very much -- it looks
6 like ours now that I'm looking at it. It looks
7 like a Surface with a keyboard.

8 Q Okay. If you look at 248 --

9 A Yeah.

10 Q -- do you know what this is?

11 A Yes, sir. It looks like a USB drive.
12 I can't really tell. Yes, it looks like a drive.

13 Q Like an external hard drive?

14 A Yeah.

15 Q Okay. And do you see where it's got
16 the project number and then "EMS 01"?

17 A Yes, sir.

18 Q The Dell basic warranty, the external
19 hard drive, does this look like a drive that you
20 guys brought with you?

21 A It does.

22 Q And is -- it's my understanding that

1 the EMS 01, that what this indicates is this is the
2 hard drive that likely contained the data taken
3 from the EMS -- sorry, copied from the EMS server?

4 A Yes, sir.

5 Q Okay. And then in 249, these are
6 more CompactFlash drives copied on-site by the
7 team?

8 A Yes, sir.

9 Q And 250, this is another -- well,
10 strike that.

11 250, do you see where it's got again
12 the project number and then "Tabulation 01"? Do
13 you see that?

14 A Yes, sir.

15 Q And do I understand correctly that
16 in -- in the picture, in 250, that this is the
17 central scanner or what's often referred to as the
18 tabulator in the office?

19 A Based on the label and the
20 documentation, yes.

21 Q And, again, this is a device that the
22 team copied the data from?

1 A Yes, sir.

2 Q Okay. If you go to 251, do you know
3 what this is?

4 A It looks like a router. Yeah, it's a
5 router, I think. I can't really tell.

6 Q Do you know whether the team
7 attempted to copy data from a router?

8 A I don't think they did. No, they did
9 not try to collect data from a router.

10 Q Would you expect there to be data on
11 a router?

12 A No.

13 Q All right. 252, more CompactFlash
14 drives that the team copied?

15 A Yeah.

16 Q All of the data that was copied from
17 Coffee County, that was all copied on-site in the
18 office?

19 A Yes, sir.

20 Q Okay. So there was never a moment
21 when someone provided equipment or devices to the
22 SullivanStrickler team from Coffee County that was

1 copied outside of the office?

2 A That's correct.

3 Q Okay. Look at 253. That's
4 Mr. Maggio standing on the left, right?

5 A Yep. Yes, sir.

6 Q So this is another picture in the
7 elections office from January 7th, 2021, right?

8 A Yes.

9 Q And do you know what these two
10 computers here are?

11 A I do not.

12 Q Okay.

13 All right. Look at the page ending
14 in 254. It says "SOS_Georgia & Votes!" Do you
15 know what this is a picture of?

16 A I do not.

17 Can we back up?

18 Q Sure.

19 A I think I -- now that I think about
20 it, these don't -- this doesn't look like an
21 external drive, if we go to 248.

22 Q Okay.

1 A And I think I referenced it as that.
2 I don't know what this is.

3 Q Oh, I see. Okay.

4 A Do you know what I mean? I think my
5 original comment was, "I believe this is one of our
6 deliverables." I don't think it is.

7 Q So --

8 A Sorry about that.

9 Q No, no, no. That's no problem at
10 all.

11 Flip to 244. The desktop computer
12 that's standing up here on the desk, used with the
13 EMS server, that's a Dell computer. Do you see
14 that?

15 A Yes, sir.

16 Q Okay. Now, if you flip to 248,
17 there's a reference to "EMS 01," and it says, "Dell
18 Basic Warranty." And if you look, you can see a
19 keyboard in the top right corner, you can see the
20 cables off to the left.

21 Does it look like this is -- what's
22 pictured here is that desktop computer?

1 A It does.

2 Q Okay.

3 A Sorry I had to go back.

4 Q No, no.

5 A Okay.

6 Q I'm glad you did that. That's very
7 helpful.

8 So then we come to 254. We have a
9 picture of the same Dell desktop. You can actually
10 see it now sitting next to the router on the table
11 in the EMS server room.

12 Do you see that?

13 A Yes.

14 Q And there's a Post-it note on it. Do
15 you know whether that Post-it note is a password
16 that is used for that computer?

17 A I wouldn't know. We don't need
18 passwords.

19 Q Okay.

20 A So we wouldn't --

21 Q I was going to ask you that.

22 A Okay.

1 Q The forensic copying that you guys
2 did in Coffee County, you were able to take all of
3 the data that you took without needing passwords to
4 any devices?

5 A That is correct.

6 Q And how -- walk me through sort of
7 how that's possible.

8 A When -- passwords that are typically
9 provided, unless they -- that are on local
10 machines, or on machines, if they are not
11 encrypting the actual OS at boot, when it boots,
12 you can forensically image -- we're only looking at
13 a source.

14 So we can look at -- here's an
15 example: So if this laptop here had a password on
16 it, when we attach our device and we boot and we
17 point to that to collect, it's just looking at a
18 block of data or the data that's on the disk. And
19 also pieces of the disk that may not contain data,
20 but fragments of data. So imagine it just
21 collecting that, whatever's on the disk, then
22 creating an image of that, and then taking that off

1 with it.

2 Now, if I was looking to do something
3 targeted where you said to me, you know, "We really
4 only want these files," without doing a forensic
5 image, we would require a password to attach to the
6 machine and then to filter down using Windows tree
7 viewer or searching or whatever to grab the files.

8 But there's no need -- for the
9 technologies that were here for us to need any
10 passwords to gain that -- to forensically image
11 them.

12 Q And the forensic image captures, if
13 done correctly, all of the files, all of the data
14 sitting on the device?

15 A Yes, sir.

16 Q Once the data is pulled off in that
17 process, is a password needed to then access that
18 data on whatever device it's copied to?

19 A Yes, sir.

20 Q So the -- the data that is -- that
21 was taken -- I'll be more precise. The data that
22 was copied in Coffee County, has anyone at

1 SullivanStrickler accessed that data, like opened
2 files?

3 A No, sir.

4 Q So that data was simply copied to
5 devices, uploaded to a ShareFile, and that data was
6 then shared with whoever you were directed to share
7 it with?

8 A Yes. So the -- the flow is this:
9 The -- we go in, we're directed to collect -- say I
10 walked into this room and, "All right. We need you
11 to forensically image all this stuff." Okay. We
12 bag and tag it. We take the pictures. We
13 forensically image all of -- all of these
14 particular items.

15 Some of them may -- may come across
16 as forensic-image files that would need to then be
17 extracted. Others may be just JPEGs or images or
18 pictures. At which point, we would then password
19 and encrypt and put on ShareFile and say -- well, I
20 skipped a step.

21 We would create a preservation copy
22 of the working copy so we have two copies. We

1 would upload the data to the ShareFile, and then
2 whomever asked for access or was given access based
3 on the attorneys, they would say, "All right. We
4 need access for this, this, and this." We would
5 create those accounts and then you would be able to
6 pull the data down.

7 Does that paint a picture?

8 Q Yeah.

9 A Does that --

10 Q Thank you.

11 A You're welcome.

12 Q So for anyone accessing that data and
13 wanting to actually look at the data itself, look
14 at the files, they might need a password to the
15 extent that any particular file is password
16 protected at the time you collected it?

17 A And they would need a password from
18 us. So everything that gets put on ShareFile is
19 password protected. So they -- it would require a
20 password no matter what to gain access to that
21 data.

22 Q Okay. When the firm shared the data

1 from Coffee County via the ShareFile, it provided
2 log-in credentials to the individuals who were
3 given access to that data, right?

4 A Yes, sir.

5 Q And so the log-in credentials would
6 be, what, a user name and a password?

7 A Yes.

8 Q And that -- once they logged in, they
9 then would have access to -- to whatever was
10 sitting on that ShareFile site for their user
11 account?

12 A For their account, yes. So -- yes.
13 So permissions based on access to certain areas
14 within that ShareFile repository. And permissions,
15 like "Ability to download, yes or no; ability to
16 upload, yes or no; you know, admin rights, no,"
17 this -- things like that.

18 Q If a user were to share their log-in
19 credentials for your ShareFile site with another
20 individual, you wouldn't have any way of knowing
21 that, right?

22 A I don't know. I don't think we would

1 be able to know that.

2 Q Okay.

3 A The only thing we would have is a
4 log -- an activity log of the original credentials
5 and their activity.

6 Q All right. Take a look at -- still
7 in Exhibit 12, go to 255. These are more
8 CompactFlash that were copied on-site in Coffee
9 County?

10 A Yes, sir.

11 Q The same with 256?

12 A Yes, sir.

13 Q 257, here we have two thumb drives
14 that were copied on-site?

15 A Yes.

16 Q Do you know what was on these thumb
17 drives?

18 A I believe these were the -- I --
19 there are thumb drives, and I'm not sure if these
20 are the labels that contain the scanned documents
21 that they had on-site, the scanned information that
22 was referenced.

1 Q So if you look at these two, the top
2 one says -- it's got the project number and then TD
3 01. Do you see that?

4 A Yes, sir.

5 Q Do you know what the "TD" refers to?

6 A I do not.

7 Q And then the one below, same project
8 number, "TD 02." Do you see that?

9 A Yes, sir.

10 Q And then it says, "ICX," and I'm not
11 sure what that is. "ISC" something. Do you know
12 what that one says?

13 A I do not.

14 Q Okay. And then the thumb drive
15 itself also refers to ICX. Do you see that?

16 A Yes, sir.

17 Q And are you familiar with the
18 Dominion terminology that ICX refers to those big
19 touchscreen voting devices?

20 A Yes.

21 Q Okay.

22 A I am now.

1 Q Okay. And I'm sorry, we may have
2 covered this. The team was directed on-site to
3 collect data from those touchscreens as well,
4 right?

5 A Correct.

6 Q Okay. And then if we look at 258,
7 two more CompactFlash drives. And those were
8 copied on-site?

9 A Yes, sir.

10 Q All right. Go back to 257 for a
11 second.

12 A Okay.

13 Q Does it look to you like what it says
14 here is, "ICX install"? Maybe that's what is
15 intended?

16 A I can make that assumption, but it
17 does say "install," so I don't know -- I mean it
18 could be.

19 Q Look on the thumb drive itself. Do
20 you see where it says, "Install," I-N-S-T-A-L-L?

21 A Yes.

22 Q Okay. Who would have copied these

1 thumb drives on your team?

2 A Karuna Naik or Jim Nelson.

3 Q Okay.

4 All right. And do you know what the
5 ICX install thumb drive would be used for in the
6 office?

7 A I do not.

8 Q Okay. And if you look here at 258,
9 it refers to "ICP advance voting scanner card." Do
10 you see that?

11 A Yes.

12 Q So do I understand correctly, these
13 CompactFlash drives, the data was copied -- they
14 are used with scanners in the Coffee County
15 election office that were used with advanced
16 voting?

17 A I don't know.

18 Q Okay. 259, there's a Post-it note.
19 It says, "Elect#" -- a little pound sign -- "2020."
20 Do you see that?

21 A Yes, sir.

22 Q And then there's a -- it looks like

1 maybe a 16-digit alpha numeric below. Do you see
2 that?

3 A Yes.

4 Q Are those passwords?

5 A Maybe.

6 Q Okay. And it looks like -- if you
7 look at the person in the background, it looks like
8 Paul Maggio is holding that, right?

9 A It does.

10 Q If you wanted to know what those
11 passwords were used for, would that be a question
12 for Paul Maggio, or someone on the team?

13 A Can I reference that memo that was
14 sent? There was a memo that was sent, right, that
15 was part of the production and it listed a couple
16 of passwords?

17 Q Oh.

18 A If it matches up to that, then that's
19 what it would be.

20 What's the 123? Yeah, it does not.

21 Q Yeah, I didn't think it did.

22 MR. CROSS: Okay. Let's, just for

1 the record, grab 11 just to be clear on what he's
2 looking at.

3 (Felicetti Deposition Exhibit Number 13
4 marked for identification.)

5 BY MR. CROSS:

6 Q Let me hand you Exhibit 13. And just
7 take a look and compare it to what you've got. And
8 let's just make sure that we're looking at the same
9 thing.

10 A Okay. Thank you.

11 Q Tab 11, Exhibit 13.

12 So the memos that you were just
13 looking at that are -- they're the same as what
14 I've marked as Exhibit 13, right?

15 A Yes.

16 Q Okay. And do you know what these
17 memos are?

18 A They were, as I understand it, the
19 passwords required to gain access to the EMS
20 server.

21 Q Okay. So if we look at these memos,
22 there are a number of passwords that are included

1 here. And is it your understanding that at least
2 one of the passwords on here would provide access
3 to the EMS server?

4 A Yes.

5 Q And what's the basis of that
6 understanding?

7 A Discussions with Jim Nelson.

8 Q Okay. But to do the work that you
9 guys did, you didn't need a password?

10 A That is correct. We did not need
11 passwords.

12 Q Given that, do you know why
13 Mr. Maggio had Ms. Jackson take a picture of what
14 looked to be passwords on page 259 of Exhibit 12?

15 A The only -- I -- I have no idea.
16 Unless it was stuck on a server somewhere, but I
17 don't know.

18 Q Okay. And then on page 260 --

19 A Hold on one second, please.

20 Q Sure.

21 A Okay. Sorry.

22 Q -- these are more CompactFlash drives

1 that were copied on-site, right?

2 A Yes, sir.

3 Q And if you look at them, these refer
4 to ICP. Do you see that?

5 A Yes.

6 Q So the CompactFlash drives that were
7 copied, some of those were used with the poll pads.
8 Is that right?

9 A Yes.

10 Q And some of them were used with the
11 ICPs. Is that right?

12 A Yes.

13 Q Were any of the CompactFlash drives
14 that were copied on-site used with any other
15 devices or equipment?

16 A CompactFlashes? No.

17 Q Okay.

18 A That I know of, no.

19 Q Okay. And then if we go to 261,
20 these are more thumb drives that were copied
21 on-site?

22 A Yes.

1 Q And we saw TD 01 and 02 earlier.
2 This goes from TD 03 to TD 07. Any idea what the
3 "TD" refers to?

4 A It would have been the tracking code
5 that we gave it. I do not know. Jennifer Jackson
6 would have done that.

7 MR. CROSS: If we can get an answer
8 to that question, too, what the "TD" refers to in
9 the photos. Thank you.

10 BY MR. CROSS:

11 Q All right. And then 262, it's a
12 picture of -- it says "Latitude 3400" at the top.
13 Do you know what this is?

14 A I don't. I do not.

15 Q And then 263, a picture of a Dell
16 laptop. Do you know what that is?

17 A I do not.

18 Q Okay. If you look here on the left,
19 there's a device plugged in with this little note
20 on it, "DFIR."

21 A Yes.

22 Q That's a device that you guys brought

1 to boot it up?

2 A Yes, to do a collection.

3 Q Okay.

4 A So this could be a targeted machine
5 for collection.

6 Q And then 264, a Canon. Do you know
7 what this is?

8 A I do not. It looks like a potential
9 print server or printer, from what I can see.

10 Q And then, lastly, 265, two more thumb
11 drives. Actually, this -- this may be another
12 picture of what we saw before, because this one has
13 TD 01 on the top. Do you see that?

14 A But it's missing the labels from the
15 other picture.

16 Q Yeah, maybe it flipped over. Oh,
17 yeah, go to -- go to 257. The tags look to be the
18 same writing. Do you think they're -- does it look
19 to you like they're the same drives, maybe just
20 flipped over? Do you know?

21 A Yeah, it looks like not only flipped
22 over, but the cover is on one.

1 Q Right, TD 01 has the cover on it?

2 A Yes.

3 Q Okay. "TD," would that potentially
4 be shorthand for thumb drive?

5 A Yes. Actually, yes, it is, just like
6 "CF" is CompactFlash, yeah. Sorry.

7 Q I didn't get it either. Adam handed
8 me a note.

9 A It's a Da Vinci Code.

10 Q I know, yeah. Too lost in the weeds.

11 A Yeah.

12 Q What does "SSA" stand for?

13 A I don't know.

14 Q So that's not a standard project code
15 that you --

16 A It is. We use it for every single
17 project.

18 Q And it all starts with SSA?

19 A Every project starts with SSA.

20 Q So maybe "SullivanStrickler" --

21 A Account?

22 Q Okay.

1 A I don't know.

2 Q Okay.

3 All right. And so what we've talked
4 about on-site, January 7, 2021, the team copied
5 data from the EMS server, a scanner that sat in
6 that room, and a computer that works with that
7 scanner. ICPs, CompactFlash drives used with ICPs,
8 and the poll pads, some laptops that we saw, and
9 some number of ICXs, or what are referred to as the
10 BMDs, the big touchscreens. Is that right?

11 A Yes.

12 Q Is there anything else that you're
13 aware of the team copied data from on-site that day
14 that we have not yet talked about?

15 A There was the -- I believe, a hard
16 drive that I mentioned when we started today
17 that -- I'm sure it's referenced in the chain, but
18 I wasn't sure what that was for.

19 Q It was an external hard drive that
20 was sitting in the office?

21 A Yes, sir.

22 Q And you don't know what -- what was

1 on that?

2 A Huh-uh.

3 Q No?

4 A No. No, sir.

5 Q Okay. The data that was captured
6 from Coffee County forensically, does that include
7 components that would be needed to reverse-engineer
8 any of the software from those devices?

9 A I don't know.

10 Q Is that -- is that an expertise that
11 you have, reverse-engineering software?

12 A Not operating systems.

13 Q Other types of software?

14 A Legacy. So maybe back-up tape
15 software.

16 Q Was SullivanStrickler retained to
17 copy election data or equipment for any Georgia
18 county beyond Coffee?

19 A No, sir.

20 Q Was there ever any discussion with
21 any client about potentially copying election data
22 or equipment in Georgia beyond Coffee County?

1 A No, sir.

2 Q How was the decision made to do the
3 collection in Coffee County specifically?

4 Who made -- who made -- who picked
5 Coffee County? Was it the client?

6 A The client.

7 Q Did the client -- and are we
8 talking -- for the client, are we talking about
9 Jesse Binnall or Sidney Powell or someone else?

10 A Sidney Powell through Jim Penrose and
11 Doug Logan.

12 Q Okay. Does the firm have any insight
13 into how they selected Coffee County?

14 A No.

15 Q Are you familiar with an -- an
16 individual named Ben Cotton?

17 A I've read the name, but that's it.

18 Q Are you aware that Ben Cotton
19 purports to be a computer science expert who has
20 testified under oath in a proceeding in Arizona
21 that he has analyzed the data that your team
22 collected from Coffee County?

1 A I did not know that.

2 Q Okay. Do you know how he got that
3 data?

4 A No.

5 Q He has also testified that he has
6 analyzed similar data from Fulton County. Were you
7 aware of that?

8 A No.

9 Q Did anyone at SullivanStrickler have
10 any involvement with collecting data from Fulton
11 County?

12 A No.

13 Q So look -- take a step back to the
14 start of the trip. You said it's early January of
15 2021, you guys get the green light from Jim Penrose
16 and Doug Logan to go to Coffee County, right?

17 A Yes, sir.

18 Q How precise can you be -- was it --
19 how many days before the team left on January 7th,
20 do you know?

21 A How many?

22 Q I'm sorry.

1 When the green light came in from Jim
2 Penrose and Doug Logan, was it the day before? Was
3 it a few days before?

4 A I believe it was a day or two before.

5 Q And your understanding is based on
6 discussions with the teams -- the team?

7 A With the teams, and I believe it's in
8 some of the e-mail threads.

9 Q Okay. Yeah, I mean the e-mail thread
10 we looked at before -- I mean, we can go back to
11 it, but it jumps from December to the day of
12 January 7th when they were leaving that morning.

13 A I know it was early January based on
14 my discussions with the team.

15 Q And presumably for a project like
16 this, the team would have to have some advanced
17 notice so that it could get ready?

18 A Yes.

19 Q Okay. And so we just saw, for
20 example, that they -- they brought in various
21 equipment and devices. So they would need enough
22 notice to figure out what equipment they needed and

1 who all would need to go down?

2 A This is not unlike many projects. It
3 is you have 24 to 48 hours to be on-site type of
4 deal.

5 Q So oftentimes in your -- in the
6 firm's practice, you might only get a day or two
7 notice on a project like this?

8 A Absolutely.

9 Q Okay. And the best sort of timing
10 you can give me is sometime within a day or two
11 before January 7th is when the team was told "Go to
12 Coffee County"?

13 A Yes, sir.

14 Q Okay. And that came from Jim Penrose
15 and Doug Logan?

16 A Yes, sir.

17 Q And was it sometime in that window
18 where Jim Penrose and Doug Logan also told the
19 team, "Scott Hall is going to help coordinate"?

20 A I don't know.

21 Q Okay. And do you know at what point
22 the team was connected with Cathy Latham to also

1 coordinate?

2 A I believe the day of.

3 Q Okay. Did Mr. Maggio select the
4 members of the Coffee County team after the
5 greenlight from Jim Penrose and Doug Logan or had
6 he already had a team on stand by?

7 A I would assume after -- I can't
8 assume.

9 Q Don't guess. It's okay.

10 A After, based on if it was the same
11 team -- if it was the same team utilized or -- or
12 briefed on any other collection as a team, then we
13 would deploy the same team. And also timing and
14 availability. But there's always people ready to
15 go for a matter when it involves forensic
16 collections. So I don't know if that helps.

17 Q No, no, that helps.

18 Greg Freemyer was one of the
19 individuals who was responsible for the data
20 collection in Michigan, right?

21 A Yes.

22 Q Do you know why Mr. Freemyer was

1 responsible -- or part of the team for Michigan,
2 but not part of the team for Coffee County?

3 A Another project?

4 Q You just don't know?

5 A Yeah, I don't know.

6 Q That's fine.

7 A Yeah.

8 Q Okay. For the copy of the data that
9 we got on a hard drive, is there any information
10 our experts would need to access that data to look
11 at it themselves?

12 Like, do they need log-in credentials
13 from SullivanStrickler?

14 A Well, they would need the password to
15 decrypt, but I don't know how the data was
16 delivered to you. If they were delivered to you as
17 forensic images, then you would need somebody that
18 has the ability to open the forensic images.

19 Q Right.

20 Assuming they have that expertise,
21 they wouldn't need any log-in credentials beyond
22 the credentials that SullivanStrickler would

1 provide to decrypt the data?

2 A Correct.

3 Q Okay.

4 All right. Let me hand you 13.

5 MR. CROSS: Is that where we are?

6 MR. SPARKS: 14.

7 BY MR. CROSS:

8 Q Oh, 14.

9 (Felicetti Deposition Exhibit Number 14
10 marked for identification.)

11 MR. BROWN: This is sort of a
12 confusing question. Can I ask a question? Just
13 one question. Just one important question.

14 MR. CROSS: I don't care.

15 MR. BROWN: Okay. You just answered
16 that --

17 MS. CLARK-PALMER: Here.

18 MR. CROSS: You don't want to put
19 your mic on?

20 MR. BROWN: I'm confused with the
21 password for -- is the password that you just
22 referenced, is that created by SullivanStrickler in

1 the forensic process? Is there another one with
2 the underlying data?

3 THE WITNESS: No. They should have
4 access.

5 MR. CROSS: Yeah, let me -- let me
6 just ask it.

7 MR. BROWN: I'm sorry.

8 MR. CROSS: No, no. That's good.
9 That's good.

10 BY MR. CROSS:

11 Q So the -- so the question is: You
12 just described there was a password needed to get
13 access to the data that was collected. That is a
14 password generated by SullivanStrickler for its own
15 encryption, right?

16 A Correct.

17 Q Okay. And once that password is
18 entered, they should have access to all the
19 forensic data collected in the same way that
20 SullivanStrickler does?

21 A Yes.

22 Q Okay.

1 MR. BROWN: If the underlying -- if
2 the underlying files are encrypted or have a
3 password protection, they would need to know that
4 as well?

5 THE WITNESS: That is correct.

6 BY MR. CROSS:

7 Q So, again, if the underlying files
8 are encrypted or password protected, whoever would
9 access that would need either the password or some
10 way around the password, around the encryption?

11 A Correct.

12 MR. BROWN: I'm sorry.

13 MR. CROSS: I already knew that but
14 apparently --

15 THE WITNESS: Oh.

16 MR. CROSS: Bruce, what's my next
17 question?

18 MR. COLEMAN: While we're kind of off
19 topic, do you want to talk about a lunch break at
20 some point or --

21 MR. CROSS: Yeah. I was going to
22 suggest we can either do one more document, we can

1 break now. You're in the hot seat, you -- you
2 choose.

3 THE WITNESS: I -- I really don't
4 care.

5 MR. CROSS: Why don't we do -- why
6 don't we do one more that kind of relates to what
7 we were looking at and then we'll --

8 MR. RUSSO: Whatever is fine with me.

9 THE WITNESS: Yeah, that's fine. I
10 want to kind of get through as much as we can.

11 MR. CROSS: Yeah, typical witness
12 mentality.

13 MR. COLEMAN: It's his wife's
14 birthday.

15 BY MR. CROSS:

16 Q All right. Let's look at 14. So I
17 think you said you did not look at a copy of the
18 hard drive that was provided to us. Is that right?

19 A Correct.

20 Q Okay. So this is the file structure
21 taken from our copy of the hard drive that was
22 provided to us. So you've not seen this before?

1 A I have not.

2 Q Okay. If you just look at the -- the
3 top where it's got the project number, SSA1722. Do
4 you see that?

5 A Yes, sir.

6 Q "Hard drive contents," do you see
7 that?

8 A Yes.

9 Q And then there are these sort of
10 primary-level folders, "CompactFlash,
11 Dominion-Supplied Laptop, EMS Server, Miscellaneous
12 Thumbs, Polling Pads, Reports, Tabulation System."

13 Do you see that?

14 A Yes.

15 Q And would it be standard practice
16 when this data is collected to create a file
17 structure like this where you're storing data in
18 folders that indicate where it came from?

19 A Yes.

20 Q Okay. And so here, it would be
21 standard practice that, for example, where it says
22 "CompactFlash" that would be data copied from

1 CompactFlash drives in Coffee County?

2 A Yes.

3 Q Same with "EMS Server," for example?

4 A Yes.

5 Q And then "PW.txt," would that --
6 would it be standard practice that that would be a
7 text file that includes any passwords?

8 A Yes.

9 Q Okay.

10 A And then if you look, what we've done
11 is broken down the file structure beneath those
12 higher-level --

13 Yeah.

14 Q -- files. And so the standard
15 practice here would be to create a folder that
16 corresponds to each device, right?

17 A Yes.

18 Q So under "CompactFlash," for example,
19 we saw in the pictures there would be a
20 CompactFlash that has a note that designates it
21 CF1. The standard practice would be to create a
22 folder that captures the data in that folder from

1 that particular flash drive?

2 A Correct.

3 Q Okay. And that would be the practice
4 with everything that's captured here sort of
5 creating levels of subfolders that make clear what
6 specific device particular data came from?

7 A Yes.

8 Q Okay. Let me show you just one more
9 quick one and then we'll break if that's okay.

10 A Okay.

11 (Felicetti Deposition Exhibit Number 15
12 marked for identification.)

13 BY MR. CROSS:

14 Q All right. Let me show you
15 Exhibit 15. Exhibit 15 is another document that
16 we -- we -- it's more sort of file structure
17 information from the hard drive. And it's referred
18 to as triage reports.

19 Are you familiar with triage reports?

20 A Yes.

21 Q What are those?

22 A Reports created from forensic images

1 that are created or that are -- that are created
2 that we can provide base -- data based on
3 particular file requirements; like format, type, et
4 cetera.

5 Q So a triage report is created by
6 SullivanStrickler as part of its work?

7 A Usually, yes.

8 Q Okay.

9 A Normally, yes.

10 Q Okay. So the triage reports we would
11 see on the hard drive, those are likely created by
12 the team as part of its work, not something it
13 collected from Coffee County?

14 A Correct.

15 Q And again, maybe -- sorry, I may not
16 have fully understood. What is the purpose of the
17 triage report?

18 A Just a general overview of the type
19 of data that's been collected. Sometimes you'll
20 find -- you can, especially through remediation
21 effort, determine if a device that you imaged is
22 relevant at all based on an overview of what has

1 been imaged and collected.

2 Q Okay. And if we look here, it looks
3 like there's a triage report that corresponds to
4 certain devices, such as the laptop, the tabulator,
5 USB, and EMS.

6 Do you see that?

7 A Yes.

8 Q And what is "USB," it says,
9 "Detective reports", do you know what that refers
10 to?

11 A I have an idea, but I don't -- I
12 can't say intelligently what it is.

13 Q What would be your best-educated
14 guess on what that is?

15 A It could be a USB history report that
16 shows if drives were hooked up and files were
17 loaded on and off a device, but I -- I don't know
18 if that's 100 percent.

19 Q Okay. You mentioned before the
20 Cellebrite kit. Do you know whether that kit was
21 used or needed to collect from devices beyond the
22 poll pads?

1 A It's my understanding it was just the
2 poll pads.

3 Q So do you know specifically whether
4 it was used to collect data from the ICX, the
5 touchscreen voting machines?

6 A It may have been attempted to be
7 used, but I'm not sure what happened with those
8 because of the OS. I know they were Android, and I
9 don't know exactly how they were collected in
10 detail.

11 Q Who would that be a question for?

12 A It would be Paul or Karuna.

13 Q Okay. Do you know how many of the
14 ICX, the touchscreen machines, were imaged?

15 A I do not.

16 MR. CROSS: Why don't we break for
17 lunch. Thank you.

18 VIDEOGRAPHER: The time is 12:47 p.m.
19 We are off video record.

20 (Recess from 12:47 p.m. to 1:03 p.m.)

21 VIDEOGRAPHER: Okay. The time is
22 1:04 p.m. We are back on video record.

1 BY MR. CROSS:

2 Q All right. Some follow-up questions
3 for you on some of the stuff that we talked about.

4 So I understand SullivanStrickler
5 only had one visit to Coffee County on January 7th?

6 A Yes.

7 Q Okay. Are you aware that there
8 were -- that Doug Logan, one of the principal
9 points of contact for the firm, himself visited the
10 Coffee County elections office on January 18 and
11 19?

12 A No.

13 Q So SullivanStrickler doesn't have
14 any -- SullivanStrickler doesn't have any insight
15 into why Mr. Logan was there?

16 A Correct.

17 Q So you're not aware of any
18 communications between --

19 MR. CROSS: Thank you. That's so
20 kind.

21 BY MR. CROSS:

22 Q You're not aware of any

1 communications between Mr. Logan and anyone at
2 SullivanStrickler with respect to Mr. Logan's own
3 visit to Coffee County?

4 A Correct.

5 Q Did SullivanStrickler have any
6 insight into what the individuals who accessed the
7 data that your team copied, what those individuals
8 did with that data once they got it?

9 A No.

10 Q So sort of the extent of the role and
11 responsibilities of SullivanStrickler was copy the
12 data, provide it to the client or whomever the
13 client tells you to provide it to, and then it's up
14 to the client as to what happens from there?

15 A Correct.

16 MR. CROSS: Can whoever's on Zoom
17 make sure you're on mute? Thank you.

18 BY MR. CROSS:

19 Q Was there ever any discussion or
20 concern at SullivanStrickler that -- that anyone
21 who might get access to the data from Coffee County
22 might misuse it or was that just a topic that

1 didn't come up?

2 A Yeah, that's not -- that does not
3 come up.

4 Q Okay. And so is it fair to say the
5 firm sort of trusting or relying on the client,
6 here the lawyers, to take appropriate
7 responsibility for who get -- who gets access to
8 that data and what's done with it?

9 A Yes.

10 Q Are you familiar with the name Jeff
11 Linberg?

12 A I am not.

13 Q So you -- you've not heard that Jeff
14 Linberg joined Doug Logan on his visit to Coffee
15 County on January 18 and 19 of 2021?

16 A I don't know. I don't know.

17 Q Okay. So to your knowledge, Jeff
18 Linberg isn't someone that SullivanStrickler
19 communicated with about the Coffee County work?

20 A Correct.

21 Q Was there any written engagement with
22 Doug Logan or Jim Penrose?

1 A I don't believe so.

2 Q So your coordination with Doug Logan
3 and Jim Penrose was done pursuant to either the
4 Binnall Agreement or the Powell Agreement,
5 depending on what -- what work was being done?

6 A Yes.

7 Q So is it fair to say the direction to
8 coordinate with the two of them, that came from
9 Jesse Binnall and Sidney Powell?

10 A Yes.

11 Q Were there any written communications
12 between members of the SullivanStrickler team and
13 Doug Logan and Jim Penrose beyond the ones that
14 we've seen or that were produced?

15 A No.

16 Q And how do you know that?

17 A We've produced everything that we've
18 been asked to produce, so I don't --

19 Q And let me -- let me be a little
20 clear.

21 A Yeah.

22 Q So the document subpoena we served on

1 Paul Maggio, is it -- is it the case that in
2 complying with that subpoena, Mr. Maggio produced
3 all e-mails, correspondence, any documents that --
4 that SullivanStrickler, as a firm, has with respect
5 to the Coffee County work?

6 A Yes.

7 Q And what's your basis for that
8 understanding?

9 A Based in discussions yesterday.

10 Q With members of the team?

11 A Yes.

12 Q We saw one text message between Paul
13 Maggio and Cathy Latham, another between Paul
14 Maggio and Scott Hall.

15 Is it fair to say that at least some
16 members of the SullivanStrickler team used text
17 messages to communicate with some individuals
18 regarding the Coffee County work?

19 A Outside of what you just identified,
20 between each other or -- I don't --

21 Q In any way.

22 Like, to what extent did the team use

1 text messaging to communicate with anyone regarding
2 the Coffee County work?

3 A Internally, I'm not sure. But they
4 may have texted one another as far as the internal
5 team.

6 Q So is it your understanding that
7 SullivanStrickler has produced all text messages
8 with respect to the Coffee County work that
9 Jennifer Jackson, Jim Nelson, and Karuna Naik also
10 have or might -- would have?

11 A I don't know.

12 Q Do you know whether Scott Hall made
13 any other trips to Coffee County with respect to
14 election issues?

15 A I do not.

16 Q Does the firm know of -- of anyone
17 else beyond the folks we've talked about today who
18 visited any Georgia county to copy voting software
19 or data?

20 A I'm only aware of Coffee County
21 period and what we did. So I don't know anything
22 outside of that.

1 Q Is there anyone beyond the folks
2 we've talked about today or seen in the photos that
3 the firm is aware of that -- that visited Coffee
4 County at any point to copy voting equipment or
5 data?

6 A Can you repeat the question?

7 Q Sure.

8 A Sorry. Sorry.

9 Q So we talked about a number of
10 people, like your team, Scott Hall, others. We've
11 looked at some photos.

12 My question is just specific to
13 Coffee County. Is there anyone known to
14 SullivanStrickler that visited Coffee County to
15 copy voting equipment or data beyond the names
16 we've already talked about or seen in photos?

17 A No.

18 Q Okay. Do you know whether the EMS
19 server in Coffee County has internet capability,
20 like remote access?

21 A I do not know.

22 Q So in some of the pictures we looked

1 at, it looked like there was a router sitting on
2 that table.

3 A Right.

4 Q Do you have any insight into why
5 there would be a router sitting in that elections
6 office where the EMS server sits?

7 A I do not.

8 Q Did SullivanStrickler ever access any
9 of the voting equipment or data in Coffee County
10 remotely over the internet?

11 A No. Everything was air gapped.

12 Q And when you say "air gapped," you
13 mean your collection of it was air gapped?

14 A Yes.

15 Q None of the devices you brought with
16 you were connected to the internet?

17 A That is correct.

18 Q Okay. What was the process -- and
19 you may have touched on this before, but just to
20 make sure I understand.

21 What was the process for getting the
22 data onto your ShareFile site?

1 I know we talked before, you
2 consolidate the data, then you upload it to the
3 ShareFile site. That's done physically in the
4 SullivanStrickler office?

5 A Right. So a copy is made,
6 consolidated, that we discussed, of all of the
7 targeted data that was collected. That -- those
8 drives that were utilized to collect the data are
9 then preserved with a preservation copy. So you
10 have a working copy, a preservation copy. The
11 preservation copy is then -- that data is then
12 uploaded to the ShareFile.

13 Does that answer your question?

14 Q Yes.

15 A Okay.

16 Q Did SullivanStrickler require anyone
17 who had -- was given access to the ShareFile for
18 the Coffee County data to sign any kind of
19 non-disclosure or any confidentiality agreement?

20 A No. We were working under the
21 original agreement information.

22 Q So the way it would work is your

1 points of contact, like a Doug Logan or a Jim
2 Penrose or Sidney Powell, would -- would reach out
3 to SullivanStrickler and say, "Hey, I want you to
4 share the Coffee County data with -- with this
5 individual as well." And then you guys would give
6 log-in credentials for the ShareFile to that
7 individual?

8 A That's exactly right.

9 Q Does each individual have their own
10 log-in credentials for ShareFile?

11 A Yes. And permissions.

12 Q Right.

13 You talked about this before. Each
14 individual user may have some different
15 permissions, meaning one user can upload and
16 download, but another can only download?

17 A Or only have access to certain areas
18 within ShareFile.

19 Q Are you aware that one or more of the
20 individuals that you guys gave log-in credentials
21 to shared their log-in credentials with -- with
22 other individuals?

1 A I am not aware of that.

2 Q You have not heard that Ben Cotton
3 testified that that was done?

4 A Not that specifically.

5 Q Okay. Are you familiar with the name
6 Dave Bossie, B-O-S-S-I-E?

7 A I am not.

8 Q Not someone that you're familiar
9 with, with respect to the Coffee County project, or
10 at all it sounds like?

11 A At all.

12 Q Okay.

13 A That name bears nothing.

14 Q We talked about collecting data from
15 the poll pads.

16 What specific data was captured from
17 the poll pads?

18 A I don't know. And the reason why I
19 say that is because we don't know what fields or
20 information is collected from the devices because
21 they are created as images. Like I wouldn't -- I
22 don't know.

1 Q Do you understand the -- the poll
2 pads are used to check voters in for voting at the
3 precincts?

4 A Yes.

5 Q And are you aware that the poll pads,
6 as I understand it, have on them specific voter
7 information?

8 A I would -- yes.

9 Q Okay. And do you understand that by
10 forensically capturing all the data on the poll
11 pads, that data includes personal identifying
12 information, PII, for Georgia voters?

13 A I don't know. And the only reason
14 why I say that is because I don't know what that
15 data looks like or the information. I can say that
16 they were imaged.

17 Q With respect to the engagement in
18 Coffee County, was there ever any concern raised
19 about the possibility of forensically capturing PII
20 for some seven million voters in Georgia?

21 A No.

22 Q All right. Did -- is it fair to say

1 the client never warned SullivanStrickler that by
2 capturing data on the poll pads, that they would be
3 capturing PII for Georgia voters?

4 A Correct.

5 Q Okay. The data that was loaded to
6 the ShareFile at the direction of the client, did
7 that include all of the data collected from Fulton
8 County -- I'm sorry, from Coffee County?

9 A Yes.

10 Q So in addition to Coffee County,
11 there was a SullivanStrickler team, that included
12 at least Paul Maggio, that did some copying of
13 voting data or software in Antrim County, Michigan,
14 right?

15 A I don't know.

16 Q I'm setting up for a broader question
17 which is --

18 A Yeah.

19 Q -- what experience does
20 SullivanStrickler have, prior to Coffee County, in
21 specifically collecting and preserving data from
22 voting equipment, if any?

1 A Well, voting equipment being a
2 tablet, laptop, hard drives, servers, an extensive
3 amount, if we look at it purely from a technology
4 standpoint.

5 Q It's fair to say there was nothing
6 unusual about the technology that was copied in
7 Coffee County, that it went beyond the firm's prior
8 experience and training in terms of doing this type
9 of forensic collection?

10 A That's correct.

11 Q So we talked about there's a device,
12 I think you may have referred to it as the UEFI
13 device. Do you know what that is?

14 A It is the -- it is a collection tool,
15 yes.

16 Q The software that's used on that
17 collection tool, is that something -- where does
18 that software come from? Where did it come from?

19 Like, for example, is that standard
20 software off the shelf?

21 A It's the standard, yeah. And I don't
22 know where it originated from.

1 Q So it's not software that
2 SullivanStrickler wrote?

3 A No. No.

4 Q So that's standard off-the-shelf
5 software that the firm obtains from some source
6 that it then uses for this type of collection?

7 A Correct.

8 Q And you -- you don't know the source
9 of that software that you guys use?

10 A I do not.

11 Q Do you know what it's called? Is
12 there a brand?

13 A I don't know.

14 Q Okay. And can you sort of to the
15 best of your ability, walk me sort of mechanically
16 how that device works?

17 The UEFI device, like, how does it
18 work?

19 A Well, there's -- it's similar to what
20 we were doing for the -- it's similar to the DFIR
21 list, where it's bootable, not leaving a footprint
22 in grabbing data. To the extent of the details

1 around it, I wouldn't know.

2 Q Okay. Why does -- why does some
3 devices need the UEFI software and others use
4 the -- like you said, the DFIR, the D-F-I-R,
5 software?

6 A Source technologies, how data is laid
7 down on disk, physical disk. Operating system
8 information, whether a disk -- it's a physical
9 disk, whether it's logical, whether it's -- there
10 is a number of things.

11 However, the list of tools that are
12 utilized by companies like SullivanStrickler are
13 pretty standard amongst all of us, but it would be
14 the technology. So Cellebrite for iPads, X-Rays
15 for mobile phones. Just for -- as an example,
16 there are multiple softwares that are used
17 specifically in our industry for certain
18 technologies.

19 Q Is it fair to say that the
20 Cellebrite, the DFIR, the UEFI, those all serve
21 essentially the same purpose, but they're designed
22 to be used with different technology?

1 A Yes.

2 Q Okay. Did the team run into any
3 capability issues with any of the software they
4 brought with them for collection, in terms of
5 getting it to work with the local software and data
6 they were copying?

7 A Yes.

8 Q And walk me through that.

9 A I want to say three CompactFlash
10 drives, I believe, didn't collect properly, so we
11 utilized another software called PALADIN. I could
12 be wrong on the number. PALADIN is similar to --
13 it's another platform that is used to image
14 devices.

15 So sometimes if a -- you know, if a
16 collection fails, we have in the toolkit another
17 software that will work. And I -- I don't know if
18 it's three. I don't know what the number was, but
19 it -- it was used on a couple of devices that
20 failed.

21 Q Okay.

22 A And data collections.

1 Q And did PALADIN then successfully
2 work?

3 A Yes.

4 Q Okay. Are you familiar with a device
5 called a hardware write blocker?

6 A Yes.

7 Q What does that do?

8 A It's a physical device that does not
9 allow any footprint on disks via hardware. So you
10 can't alter, you can't edit, you can't add a file,
11 delete a file. It keeps the disk in pristine
12 condition so you can boot off it.

13 Q And is using a hardware write
14 blocker, is that generally considered a best
15 practice for the type of forensic work you guys do?

16 A Yes, depending on, yeah, what's being
17 collected.

18 Q And why is that?

19 A It's another mechanism in which not
20 to leave your -- a trace or altered metadata.

21 Q Did the team for Coffee County use
22 some sort of hardware write blocker for their work?

1 A I don't know if they needed write
2 blockers for what we did. Maybe on the EMS server,
3 but I would have to -- I -- I don't know.

4 Q So the idea is, it may be that they
5 were able to do this sort of pristine copy that
6 doesn't leave traces on the original equipment in
7 Coffee County without needing the hardware write
8 blocker?

9 A That's correct. So every --
10 everything that was collected, forensically imaged,
11 was unaltered. So how they got there, whether it
12 was a write blocker or not, which I don't think it
13 was a write blocker, the means at which they got
14 there was the same result as a write blocker, if
15 that makes sense.

16 Q Yes.

17 Were any of the devices that
18 SullivanStrickler brought in and used in Coffee
19 County on-site, were any of them a Samsung device?

20 A That we used --

21 Q Yeah.

22 A -- to collect?

1 Q Yeah.

2 A I do not believe so.

3 Q And were -- I may have asked you
4 this, but just to be clear, were any of the
5 devices, anything at all that SullivanStrickler
6 brought in and they connected to any equipment in
7 the Coffee County office, were any of those devices
8 connected to the internet at any point during the
9 collection?

10 A They were not.

11 Q And all of the devices that you guys
12 used to collect data, none of those devices has
13 ever been directly connected to the internet?

14 A I don't even know if that's accurate.

15 Q Okay. You just don't know?

16 A Yeah, I don't -- I don't know.

17 Q At some point, the data was
18 consolidated and uploaded to ShareFile?

19 A Correct.

20 Q And so at some point, there was a --
21 a SullivanStrickler device that had the data that
22 was connected to the internet to load it to the

1 ShareFile site?

2 A Yes.

3 Q Okay.

4 A Which is encrypted in transmission as
5 well.

6 MS. CLARK-PALMER: When you get to a
7 good breaking point, the food is here.

8 MR. CROSS: Okay. Cool. We're
9 almost there.

10 BY MR. CROSS:

11 Q To the best of the firm's knowledge,
12 the work that was done in Coffee County was done
13 according to standard policies and practices, and
14 you would not expect to have left any trace of that
15 work on the local equipment and devices?

16 A Correct. Yes, sir.

17 Q Okay. And as you sit here, based on
18 any information available, do you know -- have you
19 learned anything that would lead you to believe
20 that the team somehow inadvertently or
21 intentionally did leave traces behind?

22 A No.

1 Q Okay. As you sit here, you have no
2 basis to believe that that was the case?

3 A That's correct.

4 Q Okay. What's the basis for the
5 team's belief that the UEFI USB drive or the
6 software on it would not affect any of the target
7 devices it was used on?

8 A I don't know.

9 Q Okay.

10 A I mean, we can -- because it's a
11 standard software, that's, I believe, defensible.
12 I don't -- an approach, but I can't answer for --
13 for that.

14 Q Did the team take any measures to
15 determine whether any of the devices that it
16 brought with it to connect to the Coffee County
17 equipment to determine whether any of those devices
18 might have been compromised with malware or
19 something similar?

20 A The -- so the bootable -- can you
21 repeat the question?

22 Q Yeah. And let me kind of take a step

1 back.

2 A Sure.

3 Q In the ordinary course of work for
4 SullivanStrickler, you have your own devices you
5 bring in to do a forensic collection?

6 A Correct.

7 Q And that includes a variety of
8 different types of devices, like hard drives, thumb
9 drives, right?

10 A Yes.

11 Q Okay. It also includes things like
12 laptops?

13 A Correct.

14 Q Is there any standard or practice at
15 SullivanStrickler to routinely test all of that
16 equipment to determine whether that equipment has
17 been compromised in some way, like, for example, by
18 malware?

19 A Yes, but not every device, because
20 not every device needs it. So I guess the ones
21 that technically would require it, would fall under
22 that guide, but . . .

1 Q How often is that sort of testing
2 done on any device that you would use in the course
3 of your work?

4 A I don't know.

5 Q And you said some device doesn't --
6 some devices don't need that. Why would some
7 devices not need that?

8 A Well, I'm thinking about hardware
9 devices used for forensic imaging where it's a
10 device that you put between source and target that
11 just moves and copies data.

12 Q And it's your understanding that type
13 of device, for example, it just couldn't store
14 malware on it?

15 A Correct.

16 Q I see.

17 And what type -- give me an example
18 of that kind of device. Is there some sort of --

19 A It's been a while. I -- FTK, one of
20 the -- no, not FTK. The -- I don't know. I'll
21 have to get back to you, but it'll come to me.

22 Q Okay. We're almost --

1 A Oh, ImageMaster, I believe it's
2 called. ImageMaster devices are purely that,
3 source destination, let them go.

4 Q Has the team examined any of the
5 devices or data that are brought back from Fulton
6 County to check whether any of those devices
7 contain malware or some sort of compromising
8 software?

9 A No.

10 Q Does -- the normal services
11 SullivanStrickler provide, does that include
12 helping clients with cyber breaches or things like
13 malware?

14 A No.

15 Q Has the firm ever had itself a cyber
16 breach or a malware attack?

17 A No.

18 MR. CROSS: All right. Let's break.
19 Thank you.

20 THE WITNESS: Okay. You're welcome.

21 VIDEOGRAPHER: The time is 1:30 p.m.
22 We are off video record.

1 (Recess from 1:30 p.m. to 2:16 p.m.)

2 VIDEOGRAPHER: The time is 2:16 p.m.

3 We are back on video record.

4 BY MR. CROSS:

5 Q All right. Let me show you --
6 actually, so there were some outstanding questions.
7 Were you able to get knowledgeable on some of
8 those?

9 A Yes.

10 Q Okay. Do you need me to ask them
11 again or do you just want to walk me through what
12 you were able to learn over the break?

13 A If you want to ask them again, that
14 would be helpful.

15 Q Okay. Do you know who Jesse
16 Binnall's client was for the SullivanStrickler
17 engagement?

18 A No.

19 Q Okay. And does that mean the firm
20 itself does not know?

21 Like, did you talk to members of the
22 team and they don't know?

1 A Yes.

2 Q Okay. Same question for Sidney
3 Powell; do you know who her client was?

4 A No. Oh, I do. Hold on. We had a
5 chat. Sorry. I apologize.

6 Q That's okay.

7 A Defending the Republic. I apologize.

8 Q So is this -- all right. So what
9 you've got here is a copy of the check that was
10 paid to you guys?

11 A Yes.

12 Q All right. So --

13 A So when I referenced before I wasn't
14 sure if it was --

15 Q Yeah.

16 A That's it right there.

17 MR. CROSS: So we'll mark this -- we
18 don't -- we don't have an Exhibit Share, but that's
19 fine. Are we on Exhibit 16?

20 MR. SPARKS: I think it's 16.

21 MR. CROSS: Actually, you know what
22 I'm going to do? I'm going to mark this at the end

1 because otherwise it's going to throw -- it gets
2 complicated on Exhibit Share. So just remind me at
3 the end to mark this as an exhibit. We won't do it
4 for now.

5 BY MR. CROSS:

6 Q Okay. So the check came for the
7 Sidney Powell Engagement from Defending the
8 Republic, Inc. And that's for the Coffee County
9 work?

10 A Yes.

11 Q And do you know anything about that
12 organization?

13 A I do not.

14 Q Okay. Let's see. Oh, was anybody
15 able to identify the person who came in who was
16 with Scott Hall on-site?

17 A No.

18 Q Did that person do anything on-site?

19 A Not as far as collections, no.

20 Q What did he do?

21 A As we understand it, he was with
22 Scott Hall as a programmer.

1 Q And when you say "programmer," what
2 do you mean?

3 A That's all I know.

4 Q Somebody who would program software
5 or computers?

6 A Yes.

7 Q Okay. Did he have a computer or
8 devices with him?

9 A I don't know.

10 Q Okay. Did he offer any direction or
11 guidance to the SullivanStrickler team on what to
12 do?

13 A He did not.

14 Q Okay. He was just there with Scott
15 Hall --

16 A That's correct.

17 Q -- as a programmer?

18 A Correct.

19 Q Okay. Did anyone who was there that
20 day on-site, to the knowledge of the firm or the
21 team, take anything with them that they did not
22 bring in themselves apart from data that was

1 copied?

2 A They did not.

3 Q Okay. And to be clear, the team that
4 was there from SullivanStrickler, they didn't see
5 anyone take anything with them. Is that fair?

6 A That is fair.

7 Q Okay. But presumably they didn't
8 have eyes on everyone at all points in time?

9 A Presumably, yes.

10 Q Okay. And -- and just to be sure,
11 the check from Defending the Republic, it cleared?

12 A I would assume so, yes.

13 Q As far as you know, it --

14 A As far as I know --

15 Q -- cleared?

16 A -- it cleared.

17 Q Okay.

18 A Yes.

19 Q All right. Let me hand you what's
20 been marked as Exhibit 16.

21 (Felicetti Deposition Exhibit Number 16
22 marked for identification.)

1 BY MR. CROSS:

2 Q Hold on, I'm sorry. Yeah, this is
3 Tab 9.

4 And do you recognize Exhibit 16 as a
5 redacted document that your firm produced?

6 A Yes.

7 Q Okay. And what is this?

8 A The page stamped 126 identifies user
9 access credentials for certain areas of the
10 ShareFile. So the path of access, the folder,
11 first name, last name, company, e-mail, et cetera.
12 Whether they have the ability to download, upload,
13 delete, manage permissions, et cetera.

14 Q Okay. So if I flip through this,
15 essentially what I see is information for
16 individuals who were given access to the data from
17 Coffee County that was uploaded to the ShareFile?

18 A Yes.

19 Q And if I come across, I can look and
20 see under the headings of "Download, Upload,
21 Delete, Manage Permissions, Notify/Upload,
22 Notify/Download, and View." The true/false there

1 indicates whether they have permissions to do those
2 things?

3 A Yes.

4 Q True means they do; false means they
5 don't?

6 A Yes.

7 Q Okay. So just taking, for example,
8 if we look at Doug Logan, which is right in the
9 middle --

10 A Yes.

11 Q Do you see him?

12 A Yes, sir.

13 Q -- and you come across, it looks like
14 he had permission to download for true, upload for
15 true, false for -- for everything else except view,
16 he also had the -- he had permission?

17 A Correct.

18 Q So he could download stuff from the
19 site, right?

20 A Yes.

21 Q He could upload stuff to the site,
22 right?

1 A Yes.

2 Q And he could view stuff on the site?

3 A Correct.

4 Q But he couldn't delete anything?

5 A That is correct.

6 Q And what is manage permissions?

7 Does that mean giving other people
8 permissions?

9 A I believe so, yes. Or manage your
10 own permissions as well.

11 Q Ah, okay.

12 A I believe.

13 Q Okay. And then "Notify/Upload,
14 Notify/Download," what is that? Like getting an
15 alert?

16 A Where -- where are we?

17 Q At the very top, these --

18 A Oh, yeah, "Upload, Download."

19 Q The note --

20 A Oh, yes.

21 Q So the "Notify/Upload,
22 Notify/Download," would that be if someone uploaded

1 or downloaded something, anyone who had "true" for
2 that, they would get an alert?

3 A I believe so. I'm not 100 percent
4 certain.

5 Q Okay. Got it. Got it. Got it.

6 And every name we see in Exhibit 16
7 that received some sort of access to the Coffee
8 County data, that would be an individual that
9 SullivanStrickler was directed to either by Sidney
10 Powell or Doug Logan or Jim Penrose to give them
11 access?

12 A By Doug Logan and Jim Penrose, yes.
13 I'm not sure about Sidney Powell directly.

14 Q Okay. Are you familiar with Stefanie
15 Lambert?

16 A I am not.

17 Q Okay. All right. Well, we'll come
18 back to a document on that.

19 A Sure.

20 Q Let me hand you Exhibit 17, which is
21 my Tab 10.

22

1 (Felicetti Deposition Exhibit Number 17
2 marked for identification.)

3 BY MR. CROSS:

4 Q And Exhibit 17 is another document
5 that was produced to us in response to the Maggio
6 subpoena.

7 Have you seen this before?

8 A Yes, I have.

9 Q What is this?

10 A This is a representation of the
11 FileShare activity.

12 Q So --

13 A ShareFile, sorry, to be clear.

14 Q I often make the same mistake.

15 So if we look at Exhibit 17, and just
16 take the first page, "Item Name," is that a
17 particular file that's sitting on the ShareFile?

18 A It is.

19 Q Okay. And then there's a date and a
20 time, right?

21 A Yes.

22 Q And then next to that is, "Activity."

1 If we look at the first line, that's "Download,"
2 right?

3 A Correct.

4 Q So do I understand that what this
5 shows is that the user indicated here downloaded
6 whatever item is listed there at that date and
7 time?

8 A Yes.

9 Q And the user on that first line is,
10 "Conan H," Conan Hayes?

11 A Yes.

12 Q And then it's got his e-mail address,
13 his company, ASOG, A-S-O-G. Then the IP address,
14 that would be the user's IP address?

15 A Yes.

16 Q And are you familiar with the company
17 ASOG?

18 A I am not.

19 Q And if you come to the page ending in
20 141, you'll see -- if you come down, do you see how
21 the -- under the location, there's Florida,
22 Virginia, Florida, and then we get to Milan

1 Lombardia. Do you see that?

2 A Yes.

3 Q And that corresponds to downloads by
4 Conan Hayes on January 13 of 2021. Do you see
5 that?

6 A Yes.

7 Q And then go to the page ending in
8 50 -- 150.

9 A Excuse me, real quick. You said
10 2020 -- oh, I'm sorry. Okay. Never mind.

11 Q Yeah.

12 A And you want me to go to where?

13 Q 150.

14 A Okay.

15 Q And here we have -- you'll see Doug
16 Logan has some downloads, indicates in Florida,
17 then there's New Jersey. And then we get to
18 Florence, Toscana for Scott T on January 9, 2021.

19 Do you see that?

20 A Yes, sir.

21 Q And that -- that, again, indicates
22 the location that was captured in the system for

1 where the person was when they did the download?

2 A Not necessarily.

3 Q And -- and the question I was going
4 to ask is: If someone were downloading information
5 through a VPN, for example, it may not capture
6 their actual physical location?

7 A Correct.

8 Q And so if, for example, someone
9 wanted to mask the physical location of where they
10 were and their IP address, there are ways for them
11 to do that such as the VPN?

12 A Yes.

13 Q So when -- when we look at this,
14 Exhibit 17, the IP address and the physical
15 location may or may not be the actual IP address
16 and actual physical location of the individual when
17 they did whatever they did?

18 A Yes.

19 Q And under "User," that indicates the
20 user log-in credentials for that activity, right?

21 A The user name created, yes.

22 Q Right.

1 But the firm doesn't have any way of
2 knowing whether the log-in credentials that are
3 used for any action, whether that was actually by
4 the person who was assigned those credentials,
5 right?

6 A Correct.

7 Q And do I understand the redactions in
8 here are for data that was not from Coffee County?

9 A I would assume so, yes.

10 Q Okay.

11 A But I don't know specifically.

12 Q Okay. Oh, data collection.

13 So it looks like, in going through
14 this, the latest date for any action is February 26
15 of 2021. Do you know why the log only goes through
16 February 26 of 2021?

17 A I do not know.

18 MR. CROSS: Okay. If there are
19 additional logs, we would ask for production of
20 those, because our understanding is that the data
21 sat on that ShareFile longer. In fact, I think
22 Benjamin Cotton testified that he didn't access

1 until -- until months later. I think maybe June of
2 2021.

3 BY MR. CROSS:

4 Q Do you know whether the data is still
5 on the ShareFile today?

6 A I don't.

7 Q Who would know that?

8 A Paul Maggio.

9 Q Okay.

10 MR. CROSS: If we could get an answer
11 to that, that would be great.

12 THE WITNESS: Sure.

13 BY MR. CROSS:

14 Q All right. Let me hand you -- sorry,
15 let me hand you Exhibit 18.

16 (Felicetti Deposition Exhibit Number 18
17 marked for identification.)

18 BY MR. CROSS:

19 Q So at the top, this is an e-mail from
20 Greg Freemyer, of SullivanStrickler, to Paul Maggio
21 and Karuna Naik on April 22nd, 2021 at 5:55 p.m.

22 Do you see that?

1 A Yes.

2 Q Is this one of the documents that you
3 looked at as well for today?

4 A I believe it is, yes.

5 Q Okay.

6 A Yes.

7 Q So if you look at the earliest e-mail
8 in the thread, it starts on the bottom of page 1.
9 There's an e-mail from JPComms2020@[REDACTED].

10 Do you see that?

11 A Yes.

12 Q And do you understand that is an
13 e-mail address for Jim Penrose?

14 A I do not.

15 Q Okay. And so that e-mail comes in
16 April 22nd, 2021 to Paul Maggio, with a copy to
17 federalattorney@[REDACTED] and Greg Freemyer of
18 your firm.

19 Do you see that?

20 A Yes.

21 Q And the subject line, if you go to
22 the top of the next page, "Coffee County Forensics

1 FedEx Request."

2 Do you see that?

3 A Yes.

4 Q And do you see the signature block in
5 this e-mail from the JP Comms is Jim Penrose?

6 A Yes.

7 Q Okay. And so here we can see
8 Mr. Penrose writes to Paul Maggio, on April 22nd,
9 2021, "Can you please FedEx all the forensics
10 material from the Coffee County acquisition to the
11 same address as before?"

12 Do you see that?

13 A Yes.

14 Q Do you know what address that is?

15 A No, but I believe we have the labels
16 that were produced to you.

17 Q Okay. And we'll come to that.

18 A Okay. But I don't -- but I don't
19 know.

20 Q Okay. So what we talked about so far
21 is the data was collected on January 7. It was
22 then uploaded to a ShareFile at some point, but

1 here in April, we see that there were some
2 shipments, something was shipped. The data was
3 shipped to an address sometime between January 7
4 and April 22nd, because it's saying the same
5 address as before.

6 Are you aware of that data being
7 shipped between January 7th and April 22nd?

8 A I am not.

9 Q Okay. And then it says here,
10 "Invoice Stefanie Lambert for the work like last
11 time." Do you see that?

12 A Yes.

13 Q And so do you understand that
14 Stefanie Lambert was one of the people that
15 SullivanStrickler communicated with and shared the
16 Coffee County data with?

17 A I do not know.

18 Q Okay. That's not a name that came up
19 in your prep for today?

20 A Yeah, I didn't -- I didn't hear that
21 name.

22 Q Okay. So I gather you don't -- you

1 don't have any insight as to why the firm was
2 sharing the Coffee County data with Ms. Lambert?

3 A No.

4 Q Other than Mr. Penrose asked?

5 A Yeah, I don't.

6 Q And then Mr. Maggio writes back, "Jim
7 and Stefanie, this is received. We will begin the
8 process of copying everything to a drive."

9 Do you see that?

10 A Yes.

11 Q And then Mr. Maggio e-mails
12 internally asking if all of the data is on a drive
13 somewhere, would it just be best to just download
14 from ShareFile. And then Mr. Freemyer responds,
15 "That's a Karuna question. I had no involvement
16 with the Coffee County data."

17 Do you see that?

18 A Yes.

19 Q Okay. And then --

20 MR. CROSS: 17. Thanks. I think
21 this is going to be 18, right?

22 MR. SPARKS: 19.

1 MR. CROSS: I think we're trying to
2 get Exhibit 18 in.

3 MR. COLEMAN: Do you want to go off
4 the record?

5 MR. CROSS: Yeah, I want to go off
6 the record for just a moment.

7 VIDEOGRAPHER: The time is 2:36 p.m.
8 We are off video record.

9 (Recess from 2:36 p.m. to 2:39 p.m.)

10 VIDEOGRAPHER: The time is 2:39 p.m.
11 We are back on video record.

12 (Felicetti Deposition Exhibit Number 19
13 marked for identification.)

14 BY MR. CROSS:

15 Q All right. So I've handed you what's
16 been marked as Exhibit 19. And you can keep
17 Exhibit 18 handy because I think they relate.

18 If you look at Exhibit 19, there's a
19 FedEx label on the front. Do you see that?

20 A Yes, sir.

21 Q And then if you flip to the e-mail
22 thread sitting behind it, you'll see that it

1 includes part of the e-mail thread that we were
2 looking at just a moment ago. So it starts with
3 that e-mail from Jim Penrose on April 22nd, 2021
4 asking for the data to be shipped to Stefanie
5 Lambert.

6 A Yes.

7 Q And then you've got Mr. Maggio's
8 response that we saw before saying, "Received and
9 we'll begin the process."

10 Do you see that?

11 A Yes, sir.

12 Q And then now we have an e-mail back
13 from Stefanie Lambert on April 22nd where she says
14 to Paul Maggio, "Thank you." Top of the second
15 page.

16 A Yeah.

17 Q And then Mr. Maggio writes to her,
18 April 27th, 2021, "Stefanie, this is going out
19 tonight." Writes the FedEx tracking number. And
20 then sends another e-mail with a BitLocker password
21 for the data, right?

22 A Yes.

1 Q And so -- and then on the cover, this
2 is a copy of the shipping label to Stefanie Lambert
3 and the address that SullivanStrickler shipped the
4 Coffee County data to for her attention?

5 A Yes.

6 Q Okay. And, again, since we see in
7 here that it says, "Ship it to the same address as
8 before," do you have any insight into anything that
9 SullivanStrickler shipped to Ms. Lambert at this
10 address prior to this shipment?

11 A I do not.

12 Q We talked a little bit about Ben
13 Cotton. Are you aware that Ben Cotton is an
14 expert -- who holds himself out to be an expert who
15 was retained by Stefanie Lambert?

16 A No.

17 Q So do you have any insight -- well,
18 let me ask it this way: Are you aware that the way
19 that Ben Cotton got the Coffee County data that the
20 SullivanStrickler team collected was through
21 Stefanie Lambert or you just don't know?

22 A I don't know.

1 Q Do you know whether SullivanStrickler
2 provided log-in credentials to Benjamin Cotton?

3 A I don't know. The only way I could
4 look is if the ShareFile log was in here.

5 (Felicetti Deposition Exhibit Number 20
6 marked for identification.)

7 BY MR. CROSS:

8 Q All right. Let me hand you
9 Exhibit 20.

10 (Felicetti Deposition Exhibit Number 21
11 marked for identification.)

12 BY MR. CROSS:

13 Q I'm going to go ahead and hand you
14 Exhibit 21, which, as I understand it, is an
15 attachment to Exhibit 20.

16 So if you look at Exhibit 20, this is
17 a message from Jennifer Jackson to Paul Maggio,
18 Greg Freemyer, and Karuna Naik on January 8, 2021.

19 Do you see that?

20 A Yes, sir.

21 Q And there's an attachment, "SSA1722,
22 Coffee County." And then it indicates it's an

1 Excel file, right?

2 A Yes.

3 Q If you turn to 21, my understanding
4 is this -- the way the documents were produced,
5 Exhibit 21 is the attachment to that message?

6 A Yes.

7 Q Do you recognize Exhibit 21? Do you
8 know what that is?

9 A I do.

10 Q And what is that?

11 A This is a chain-of-custody log, a
12 tracking log.

13 Q Explain to me -- we talked before why
14 it's important. Can you just sort of walk me
15 through the fields and what they show? You can
16 just pick one of the rows.

17 A Sure. So the photos that we looked
18 at previously, this is a spreadsheet representation
19 of what was tagged and labeled, et cetera. So if
20 I'm looking at 20 -- 205, this guy --

21 Q Uh-huh.

22 A -- the first column representing the

1 identified was CS, CompactFlash, the flash drives,
2 b represented the label, and C represented whether
3 it was primary or secondary based on the labels in
4 the photos.

5 Q What is primary versus secondary?

6 A I don't know. I don't know if
7 they're duplicative. I don't know, but that's how
8 they were handed to us and labeled.

9 Q So the primary and secondary
10 designation, that comes from Coffee County, that's
11 not your terminology?

12 A Correct.

13 Q I see.

14 A Correct.

15 Q Okay. So grab Exhibit 12, if you
16 would, it's the photos --

17 A Sure.

18 Q -- that Jennifer Jackson took. And
19 if you look at -- look at these together.

20 A Sure.

21 Q The photo that ends in 236.

22 A Yes.

1 Q The first one is CF01, and then it
2 says "BTown-1." Do you see that?

3 A Yes, sir.

4 Q And so that would correspond to the
5 first row in Exhibit 21, right?

6 A Yes.

7 Q And then the next one in the picture
8 at 236, is CF02 BTown-2, and that corresponds to
9 the second row in 21?

10 A Yes.

11 Q Okay. So if for some reason someone
12 thought it would be really fun to do, and I will
13 leave it to someone on my team, someone could go
14 through the photos using these notes and match
15 those up to the chain-of-custody log, right?

16 A Yes.

17 Q Okay.

18 (Felicetti Deposition Exhibit Number 22
19 marked for identification.)

20 BY MR. CROSS:

21 Q All right. Exhibit 22. So
22 Exhibit 22 at the top is an e-mail from Jim Penrose

1 to Paul Maggio, January 7, 2021 at 5:13 p.m.

2 Do you see that?

3 A Yes.

4 Q And is this a document that you
5 looked at in your prep?

6 A Yes.

7 Q If you turn to the second page, look
8 down towards the bottom of the second page, you'll
9 see an e-mail from Sidney Powell, December 21,
10 2020. And here, she's talking about copying Tricia
11 with instructions to transfer money. It references
12 Phil Waldron and Todd and Conan.

13 Do you recall we looked at that same
14 e-mail earlier?

15 A Yes.

16 Q Okay. So this is the same e-mail
17 thread, but the more recent e-mails are a bit
18 different. And if you need to compare them, you
19 can grab that other exhibit.

20 So come up from the one we just
21 looked at, December 21, 2020. Paul Maggio says,
22 "Sending the invoice to Tricia."

1 Do you see that?

2 A Yes, sir.

3 Q And then we have the "thank you all"
4 by Sidney, which we saw before from Sidney Powell.

5 Do you see that?

6 A Yes.

7 Q And then in the middle of the page,
8 we get to the e-mail we saw before, January 7, in
9 the morning, that the team is on their way to
10 Coffee County, Georgia.

11 Do you see that?

12 A Yes.

13 Q And then this e-mail from Jim Penrose
14 at 5:13 p.m. on January 7, he writes to Paul
15 Maggio, "I've pulsed Mary and Tricia to respond."

16 Do you see that?

17 A Yes.

18 Q What is "pulsed"?

19 A Reached out to? I don't --

20 Q Okay.

21 A Yeah, I would assume. I don't know.

22 Q I didn't know if maybe -- for

1 example, it's not another -- like a Signal-type
2 communication platform or something, or you don't
3 know?

4 A No, I don't -- I never heard of
5 "pulsed" before.

6 Q Okay. And Tricia works with Stefanie
7 Lambert -- sorry. Strike that.

8 Tricia works with Sidney Powell?

9 A Yes.

10 Q Do you know who the "Mary" is?

11 A I do not.

12 Q Okay. And who would you ask if you
13 wanted to know who Mary was?

14 A Paul.

15 Q All right. Let me hand you what's
16 been marked as Exhibit 23.

17 (Felicetti Deposition Exhibit Number 23
18 marked for identification.)

19 BY MR. CROSS:

20 Q And this is an e-mail from Karuna
21 Naik to Paul Maggio on January 10, 2021 at
22 5:08 a.m. Is that right?

1 A Yes.

2 Q And here we see a reference to the
3 same Coffee County Excel file that we saw before,
4 right?

5 A Yes.

6 Q And if you flip to the second page,
7 that looks to be the same chain-of-custody log that
8 we looked at earlier, right?

9 A Yes.

10 Q And here -- here she writes --
11 Ms. Naik writes, "Attached is the Excel that is
12 saved to Project-Clients with an additional
13 worksheet called Zip Files. This contains the
14 names of all of the zip files we are uploading to
15 ShareFile."

16 Do you see that?

17 A Yes.

18 Q So the spreadsheet that's attached --
19 and sorry, I should have been clear. It looks like
20 there are a couple of documents that are attached
21 to her e-mail.

22 A Yeah.

1 Q One is the chain-of-custody log, and
2 then behind that is the -- this more detailed
3 spreadsheet.

4 A Yes.

5 Q And that's beginning at page 8. Do
6 you see that?

7 A Yes.

8 Q And it says "Zip Files" at the
9 bottom?

10 A Yes.

11 Q So this spreadsheet, do I understand
12 that that is a list of files that were uploaded to
13 the ShareFile?

14 A Yes.

15 Q Do you see -- if you look at page 10
16 of 10 in the spreadsheet --

17 A Yes.

18 Q -- do you see right here it says,
19 "Tabulation system," and then it refers to ICP?

20 A Yes.

21 Q We talked before that there's sort of
22 two tabulators that the Dominion System uses.

1 There's the central tabulator that sits in the EMS
2 room and then there are the local tabulators that
3 are used in the precincts.

4 Do you remember that?

5 A Yes.

6 Q Local are ICPs, central is ICC.

7 Okay?

8 The reference to ICP, is that a
9 mistake in that some of the tabulation files are
10 actually referenced -- are actually from the
11 central scanner? Do you know?

12 A I don't know.

13 Q Okay. Who would you ask that
14 question to?

15 A Paul.

16 Q Okay. Can you go back to, I'm
17 sorry --

18 A Sure.

19 Q -- Exhibit 17, the upload/download
20 log? And turn to the page ending in 140.

21 A Okay.

22 Q If you look in the middle of the

1 page, below this black redacted line, do you see
2 there's an indication of uploads and the user name
3 is Doug Logan?

4 A Yes.

5 Q And then the files that indicate to
6 the left, do you see how they all reference EMS?

7 A Yes.

8 Q Do you know why Doug Logan was
9 uploading these EMS files to the SullivanStrickler
10 ShareFile?

11 A I do not.

12 Q Do you know where those files came
13 from?

14 A I do not.

15 Q Do you know what they are?

16 A I do not.

17 Q Okay. Then come to the next page
18 ending in 141. You'll see Doug Logan's name
19 continues. And then you get to Conan H. again,
20 Conan Hayes. Do you see that?

21 A Yes.

22 Q And the first file indicates -- Conan

1 Hayes downloaded, it refers to EMS. Do you see
2 that?

3 A No.

4 Q Sorry.

5 A The first -- yeah.

6 Q Wait, no, he creates -- sorry. Back
7 up.

8 He downloads, do you see there --
9 there are five entries for Conan Hayes that say
10 "ICC/Coffee, ICC"?

11 A Yes.

12 Q Do you know where -- those files that
13 are labeled ICC that Conan Hayes downloaded, where
14 those came from?

15 A I don't.

16 Q And that's why I'm wondering if --

17 A The ICPs are --

18 Q Right, if somewhere someone along the
19 way realized they had mislabeled files taken from
20 the ICC as ICP and correct that, and that's how the
21 ICC Coffee County files ended up on the ShareFile,
22 or do you know?

1 A I don't. I -- the only thing I know
2 is what was able to be collected without failure
3 was collected.

4 Q Right.

5 A So I -- you know, if it's a labeling
6 issue, I don't know.

7 Q Okay. If it's possible to get an
8 answer to that question today --

9 A Sure.

10 Q -- whether somebody went back and
11 realized that they had mislabeled ICP as ICC --

12 A Yeah.

13 Q -- that would help. Thank you.

14 (Felicetti Deposition Exhibit Number 24
15 marked for identification.)

16 BY MR. CROSS:

17 Q All right. Exhibit 24, Tab 23. Have
18 you seen this document before?

19 A I have not.

20 Q Okay. So are you familiar with
21 Frances Watson, the former head of the
22 investigative unit at the Secretary of State's

1 office in Georgia?

2 A I'm not.

3 Q Okay. So when the -- the
4 SullivanStrickler team went into Coffee County on
5 January 7 of 2021, the election supervisor at that
6 time was Misty Hampton, right?

7 A Yes.

8 Q And are you aware that she left the
9 office in February and was replaced in April of
10 2021 by a man named James Barnes?

11 A No.

12 Q Okay. So if you look here, Friday,
13 May 7th, 2021, James Barnes, who had become the
14 elections supervisor in Coffee County, sends an
15 e-mail to Chris Harvey, who at the time was the
16 state election director, with a subject line,
17 "Coffee County."

18 Do you see that?

19 A Yes.

20 Q And then he -- Mr. Barnes writes to
21 Mr. Harvey, "The Dominion e-mail today pertaining
22 to Cyber Ninjas was alarming to me. When I took

1 over at the Coffee County office, the attached
2 business card was at the base of Misty Hampton's
3 computer monitor."

4 Do you see that?

5 A Yes.

6 Q If you flip to the next page, we have
7 the whole e-mail that got produced to us in kind of
8 a weird way.

9 It then goes on. "I thought nothing
10 of it until I heard about the situation in Arizona
11 with the DoJ. If she did not use them, she was, at
12 the very least, in contact."

13 Do you see that?

14 A Yes.

15 Q And so do you understand that in May
16 of 2021, there was an alert that came out from
17 Dominion to election jurisdictions using Dominion
18 equipment warning folks that Cyber Ninjas, Doug
19 Logan's company, was trying to get access to voting
20 equipment?

21 Had you heard that before today?

22 A I had not.

1 Q Okay. And if you come back to the
2 front page, Chris Harvey writes back to James
3 Barnes, adds Frances Watson, again, who was the
4 head of the investigative unit, Michael Barnes, the
5 head of CES, which is responsible for state
6 elections in Georgia at the state level.

7 And he writes, "Thanks for sending
8 this. I think it might be prudent to see if there
9 has been any contact between the person on the card
10 and anyone in your office and/or if they have had
11 any access to any of your equipment."

12 Do you see that?

13 A Yes.

14 Q He goes on, "I have let our
15 investigations division and CES know and they might
16 follow up with you."

17 Do you see that?

18 A Yes.

19 Q And then Frances Watson forwards this
20 on to someone in her office, Pamela Jones, "Can you
21 contact the County and verify what if any contact
22 Cyber Ninjas had with any election equipment?"

1 Do you see that?

2 A Yes.

3 Q Did anyone ever raise with
4 SullivanStrickler any concern about Doug Logan
5 having had access to voting equipment in Coffee
6 County through the SullivanStrickler engagement?

7 A No.

8 Q Was the engagement -- sorry, were the
9 engagements with Jesse Binnall and Sidney Powell,
10 were you instructed by the client that those were
11 confidential engagements; meaning you couldn't
12 share with the public that you had been retained to
13 do that work?

14 A Based on the engagement
15 documentation, I believe so, but I don't know.

16 Q Was there ever any directive from the
17 clients with respect to the Coffee County
18 engagement not to share the fact of the engagement
19 with anyone beyond anyone they authorized you to
20 share that with?

21 A I don't know. It's not -- it
22 wouldn't be common practice in what we do for work

1 to share any information regardless, so I don't
2 know if -- like maybe rephrase the question, but
3 that's . . .

4 Q So the general type of work that you
5 guys do, your ordinary -- sort of the ordinary
6 approach would be that that's a confidential
7 engagement between you and the client?

8 A Correct.

9 Q Okay. And that was the approach you
10 took here?

11 A Yes.

12 Q Has anyone ever contacted
13 SullivanStrickler on behalf of the State of Georgia
14 with any questions or concerns about the work the
15 firm did in Coffee County?

16 A I would not know.

17 Q Who would you need to ask?

18 A Paul, or Brendan maybe.

19 Q For example, is -- has any State or
20 County investigator ever asked to conduct an
21 interview of anyone at SullivanStrickler who was
22 involved in that work?

1 A Yes.

2 Q What can you tell me about that?

3 A I think -- now, I don't know if I'm
4 saying this right. I'm sorry, I'm trying to be
5 helpful. We received a subpoena.

6 Q From -- from us or from someone else?

7 A From someone else.

8 MS. CLARK-PALMER: Do you have a copy
9 with you?

10 THE WITNESS: I do.

11 I'm sorry, I'm really --

12 BY MR. CROSS:

13 Q No, that's okay.

14 A I'm sorry about that.

15 Q Sure.

16 A Sorry. The language gets me.

17 Q No, that's okay.

18 Just the one copy?

19 A Yeah, sorry.

20 Q That's okay. That's okay.

21 MR. COLEMAN: Do you want to mark it
22 and put it in --

1 MR. CROSS: Yeah.

2 MR. COLEMAN: -- and we can make
3 copies.

4 MR. CROSS: Can I mark this one or do
5 you want to make one?

6 MR. COLEMAN: That's -- yeah, you can
7 mark it and then we can run copies.

8 MR. CROSS: Okay.

9 MS. CLARK-PALMER: I'll go and grab
10 some more.

11 MR. CROSS: What are we up to, 25?
12 (Felicetti Deposition Exhibit Number 25
13 marked for identification.)

14 BY MR. CROSS:

15 Q All right. So -- all right. So
16 Exhibit 25 is entitled "Subpoena for the production
17 of documentary evidence." And this is issued by
18 the State of Georgia, Fulton County. Is that
19 right?

20 A Yes.

21 Q And it's issued to the firm?

22 A Correct.

1 Q And so do I understand right, this is
2 a subpoena that was issued to the firm by the
3 Fulton County DA, Deputy District Attorney, Will
4 Wooten?

5 A Yes.

6 Q Okay. And it's -- where's the date?
7 And it's dated August 29, 2022?

8 A Yes.

9 Q All right. And the subpoena seeks,
10 "All documents, including, but not limited to,
11 letters, contracts, e-mails, text messages,
12 voicemails, audio recordings, video recordings,
13 payment agreements, retainer agreements, data
14 received from third parties, internal or external
15 analyses, internal or external reports, phone call
16 records, billing records, and payment records
17 concerning any and all agreements between the
18 witness" -- which would be SullivanStrickler --
19 "and Sidney Powell, Lin Wood, including individuals
20 known by the witness to be associated with Sidney
21 Powell or Lin Wood in any way, to obtain, preserve,
22 analyze or otherwise transmit election data

1 obtained in Coffee County, Georgia, Antrim County,
2 Michigan, and any other jurisdiction where such
3 data was obtained, preserved, analyzed or otherwise
4 transmitted by the witness."

5 Is that right?

6 A Yes.

7 Q Okay. And I gather this is a
8 subpoena that was just recently received by
9 SullivanStrickler?

10 A Correct.

11 Q So the firm has not yet produced any
12 documents to your knowledge?

13 A I believe we have not produced any.

14 Q Are you aware of any other outreach
15 by any state or county officials in Georgia
16 regarding the work done in Coffee County?

17 A I am not.

18 Q Are you aware of any outreach by any
19 federal authorities regarding the work done in
20 Coffee County?

21 A I am not.

22 Q Just hang on to that for a minute --

1 A Yep.

2 Q -- because we will look at these
3 together.

4 (Felicetti Deposition Exhibit Number 26
5 marked for identification.)

6 BY MR. CROSS:

7 Q So let me hand you what's been marked
8 as Exhibit 26. And just hang on to that. Keep it
9 safe.

10 A Okay.

11 Q Have you seen Exhibit 26 before?

12 A I've not.

13 Q Okay. If you look back at Exhibit
14 24, we read -- when you look at this, the second
15 page after the slip sheet --

16 A Yes.

17 Q -- you saw this reference here from
18 the Coffee County elections supervisor in the
19 e-mail to the state election director referring to
20 a Dominion e-mail pertaining to Cyber Ninjas and
21 him being alarmed by that.

22 Do you see that?

1 A Yes.

2 Q So this is dated the day before,
3 May 6th, 2021, from Dominion Voting, "Customer
4 notification, maintaining secure chain of custody
5 for your Dominion Voting System."

6 Do you see that?

7 A Yes.

8 Q And here it reads, "Dominion has been
9 alerted that customers are being approached with
10 offers or requests to conduct, quote, a forensic
11 audit of their voting equipment."

12 Do you see that?

13 A Yes.

14 Q Had you learned or had the firm
15 learned at any point before today that Dominion
16 Voting Systems was concerned that individuals were
17 trying to gain forensic access to their voting
18 equipment?

19 A No.

20 Q To your knowledge, has there been any
21 outreach by Dominion Voting Systems to
22 SullivanStrickler regarding the work done in Coffee

1 County?

2 A I don't know.

3 Q Who would you need to ask?

4 A Paul Maggio.

5 Q Okay. Do you know the name Robert

6 Sinners, S-I-N-N-E-R-S?

7 A No.

8 Q Do you know whether the team that did
9 the Coffee County work had any communications with
10 Robert Sinners regarding that work?

11 A I would say no, but let me just
12 double-check.

13 Q Okay.

14 A No.

15 Q That's not a name that came up in
16 your discussions with the team members?

17 A It is. It was taken directly from
18 the -- when asked, because it was taken directly
19 from the subpoena.

20 Q Oh, oh. Oh, okay.

21 A Yeah. Oh, no, it didn't come up in
22 the course of doing what -- no, no.

1 So when asked, did you have any -- a
2 conversation, or whatever, with Robert Sinners, the
3 answer was no.

4 Q Got it.

5 So in preparing for today, you asked
6 each of the 14 members, "Did you have any
7 communications with Robert Sinners regarding the
8 Coffee County work" and they said "No"?

9 A I asked Paul.

10 Q Okay. And he said no?

11 A Correct.

12 Q What about the name Russ Ramsland?

13 A No.

14 Q Did you raise that or he said --

15 A I did, because it came up a couple
16 times in the subpoena --

17 Q Okay.

18 A -- and it was identified as no.

19 Q Okay. And I may have asked you
20 before, did you ask members of the team whether
21 they had any communications with someone named Jeff
22 Linberg?

1 A I think I looked that up and I didn't
2 see it. The answer is no, no communications.

3 Q With Jeff Linberg?

4 A That is correct.

5 Q Did you ask the team whether they had
6 any communications with Mike Lindell, known as the
7 "My Pillow guy"?

8 A I did ask, and the answer was no.

9 Q So SullivanStrickler, the firm, does
10 not have any insight as to why Mike Lindell flew to
11 Douglas, Georgia in the middle of the night on
12 February 25th, 2021?

13 A No.

14 (Felicetti Deposition Exhibit Number 27
15 marked for identification.)

16 BY MR. CROSS:

17 Q Let me hand you Exhibit 27, please.
18 And let me ask you, are you familiar with a federal
19 agency called the Cybersecurity and Infrastructure
20 Agency, or CISA?

21 A I am not.

22 Q You're familiar with DHS, Department

1 of Homeland --

2 A Yes.

3 Q Okay. Are you aware that there's a
4 federal agency that sits within DHS that has the --
5 some responsibility for election security at the
6 federal level?

7 A I'm not aware of that.

8 Q If you look at Exhibit 27, this is an
9 advisory that CISA, that agency, sent out to
10 jurisdictions that use certain of the Dominion
11 Voting Systems' equipment and software in June of
12 2022. So this is not something that you've seen
13 before?

14 A Correct, I have not seen this.

15 Q Okay. If you look at the first page
16 under "Summary" it states, "This advisory
17 identifies vulnerabilities affecting versions of
18 the Dominion Voting Systems' Democracy Suite
19 ImageCast X, which is an in-person voting system
20 used to allow voters to mark their ballots."

21 Do you see that?

22 A Yes.

1 Q And the ImageCast X here, that's what
2 we referred to as the ICX, the touchscreen?

3 A Yes.

4 Q And had the firm learned at any point
5 during the course of its engagement for Coffee
6 County or with respect to that engagement, that
7 this federal agency had identified a number of
8 serious vulnerabilities with that voting system?

9 A I don't know.

10 Q And sorry, we may have covered this,
11 but let me be precise.

12 A Uh-huh.

13 Q Was there ever a point in which
14 anyone asked anyone at SullivanStrickler to analyze
15 any of the data that was collected for any purpose
16 such as identifying vulnerabilities?

17 A There was no request for any
18 analyzation at all. It was purely, "Image these
19 devices."

20 Q Okay. Is the firm aware that
21 Stefanie Lambert, one of the people they had sent
22 the data to, is now under criminal investigation in

1 Michigan with respect to accessing voting
2 equipment?

3 A No. I shouldn't say that. I don't
4 know.

5 Q You don't know?

6 A By "firm," you mean us --

7 Q Yes.

8 A -- or the law firm that hired us?

9 Q SullivanStrickler.

10 A Oh. Repeat the question.

11 Q Do you know whether folks at
12 SullivanStrickler are aware that Stefanie Lambert
13 is under criminal investigation in Michigan with
14 respect to accessing voting equipment?

15 A I don't know.

16 Q Is there a concern today at
17 SullivanStrickler that the firm may have
18 inadvertently provided sensitive voting data and
19 software to individuals that you now might believe
20 did not have the best of intentions?

21 A No.

22 Q Is that something that's been

1 considered or discussed?

2 A I don't know.

3 Q The --

4 A No. We delivered data based on
5 direction of the law firm.

6 Q But fair to say SullivanStrickler
7 does not know what the intentions were of those
8 individuals with that data?

9 A Correct.

10 Q Okay. SullivanStrickler doesn't know
11 what those individuals had done with that data once
12 they downloaded it?

13 A That is correct.

14 Q For example, SullivanStrickler has no
15 way of knowing whether anyone who has gotten access
16 to that data has, for example, used it to develop
17 malware that then could be used to affect elections
18 going forward into the future?

19 A That is correct.

20 Q You just -- you just can't know?

21 A Can't know.

22 Q Certainly that was not

1 SullivanStrickler's intention?

2 A Correct.

3 MR. CROSS: Sorry, let me just see
4 if -- people are a lot smarter than I am. If I
5 have any additional -- Bruce, you know, just pipe
6 up any time.

7 MR. BROWN: I'm looking to the
8 smarter people first.

9 MR. CROSS: You're behind a long
10 list, my friend.

11 VIDEOGRAPHER: Do you want to go off
12 the record, sir?

13 MR. CROSS: No, because I think we're
14 about done, or at least I am.

15 BY MR. CROSS:

16 Q Do you know whether Scott Hall ever
17 received log-in credentials?

18 And you don't need to look. If he
19 did, would it be on that list?

20 A Yes, it would be --

21 Q Okay.

22 A -- on that list.

1 Q So if he's not on that list, your
2 best guess would be that he did not receive
3 credentials?

4 A Correct.

5 Q Oh, when the SullivanStrickler team
6 went into Coffee County, was there any action to
7 change any password that preexisted on any of their
8 equipment?

9 A No.

10 Q Is there anything that the
11 SullivanStrickler team did in Coffee County that
12 might possibly have caused a password to change?

13 A No.

14 Q Are you aware that James Barnes, the
15 individual who became the elections supervisor in
16 Coffee County in April of 2021, according to him,
17 at some point he could not get the EMS server
18 password to work?

19 A I'm not aware of that.

20 Q Are you aware that according to the
21 Secretary of State's office, and Mr. Barnes, the
22 Secretary came in and replaced the EMS server when

1 the password no longer would access that server?

2 A I'm aware of that based on the
3 subpoena.

4 Q Okay. But you had not learned that
5 before the subpoena?

6 A Correct.

7 Q And so does the firm have any insight
8 or any ideas as to how that password might have
9 changed, assuming it did change?

10 A No idea.

11 Q While the SullivanStrickler team was
12 in Coffee County on January 7, there were also
13 folks who were scanning paper ballots, right?

14 A Correct.

15 Q And did any of the SullivanStrickler
16 team participate in scanning ballots?

17 A No.

18 Q Was it mostly Misty Hampton who was
19 doing that?

20 A Yes.

21 Q Was there anyone else the team
22 witnessed scanning ballots beyond Ms. Hampton?

1 A Not based on my discussion with the
2 team. It was purely Misty.

3 Q And one of the -- Ms. Hampton, when
4 she was scanning ballots, was she using like a
5 generic scanner?

6 She wasn't using a Dominion scanner,
7 right?

8 A Correct, a generic office-type
9 scanner.

10 Q Does the team have any insight of
11 where that scanner came from?

12 A I believe it was there, but I don't
13 know for sure.

14 Q That's fine. Don't guess.

15 A Okay.

16 Q So, for example, did the team see
17 someone like Cathy Latham walk in with it?

18 A I don't know.

19 Q Okay. Did the -- did
20 SullivanStrickler ever receive any of the scanned
21 ballot data?

22 A On thumb drives as part of the

1 imaging.

2 Q I see. Okay.

3 A Yeah.

4 Q So Ms. Hampton scanned the ballots --
5 those ballots, that data was then loaded to a thumb
6 drive, and those thumb drives were shared with
7 SullivanStrickler?

8 A Imaged, yes, correct.

9 Q And so the data that went up on the
10 ShareFile site included both the data that
11 SullivanStrickler copied from equipment, plus the
12 cast ballot data that was scanned?

13 A If it was on a thumb drive and given
14 to us to image and that was the data, then yes.

15 Q I see.

16 A So if -- if somebody scanned the
17 images -- or the ballots and they created PDFs or
18 JPEGs and gave us a thumb drive and said, "Here,
19 image that," then yes.

20 Q Okay. I see.

21 Let's make sure we're talking about
22 the same thing.

1 A Sure.

2 Q The SullivanStrickler team went in
3 and scanned -- or sorry, copied thumb drives and it
4 copied whatever data was on those thumb drives at
5 the moment the team came in to copy them?

6 A Correct.

7 Q At the same time in parallel, Misty
8 Hampton is scanning cast ballots with a scanner?

9 A Yes.

10 Q Do you know whether -- the scans that
11 Misty Hampton created, whether those scans were
12 also at some point provided to SullivanStrickler?

13 A Yes, they were put on a thumb drive
14 for us to scan -- to forensically image.

15 Q Okay. Got it. Got it.

16 And was that done on the 7th or
17 later?

18 A No, the same day. So the 7th.

19 Q Do you know what elections she was
20 scanning ballots from?

21 A I don't know.

22 Q Okay. Did the team see anyone other

1 than Ms. Hampton scan ballots?

2 A Based on my discussion with the team,
3 it was Misty. That's it.

4 Q So we've talked about a number of
5 folks, and we looked at pictures outside the
6 building. Let me just make sure I get a complete
7 picture of the inside.

8 So in the office during the day while
9 SullivanStrickler was doing its work, it was
10 obviously the four members of the SullivanStrickler
11 team?

12 A Yes.

13 Q Cathy Latham was there for most of
14 the day. Is that right?

15 A Yes.

16 Q And I think you said earlier she was
17 helping provide some direction on what to copy?

18 A Yes.

19 Q Misty Hampton was there for most of
20 the day, also providing some direction?

21 A Yes.

22 Q Scott Hall was there for most of the

1 day, at least ensuring, in his words, that
2 everything was copied?

3 A Yes.

4 Q And Scott Hall's colleague, you guys
5 don't know his name, he was there as some kind of
6 programmer for most of the day?

7 A Yes.

8 Q Eric Chaney, board member at the
9 time, was there for most of the day during the work
10 that was happening?

11 A We don't know at what --

12 Q Well, let me ask a better question.

13 A Yeah.

14 Q There was a then-current member of
15 the Coffee County Board of Elections who was in the
16 office during most of the time that
17 SullivanStrickler was doing its work?

18 A Yes.

19 Q And it was a man?

20 A Yes.

21 Q Do you know the name Jil Ridlehoover?

22 A Yes. From the subpoena.

1 Q And do you understand she was the
2 assistant to Misty Hampton?

3 A I did not know that.

4 Q And are you aware that -- can you say
5 that she was there most of the day during the work
6 as well or do you know?

7 A I didn't think she was, but let me
8 just double-check.

9 Q If you don't know, that's fine.

10 A I think I hear a baby.

11 Q Me, too.

12 A I don't know why -- I do not know.
13 Sorry.

14 Q That's fine.

15 Do you know the name Matt McCullough?

16 A No.

17 Q Was that someone that you talked to
18 the team about, whether that person was there?

19 A I did not.

20 Q Okay. Do you know the name Alex
21 Kaufman?

22 A No.

1 Q Was that a name that you talked to
2 the team about?

3 A I did not.

4 Q Did you talk to the team about
5 whether they communicated with someone named John
6 Eastman?

7 A I did not.

8 Q Okay.

9 A We can go back to Jil Ridlehoover.

10 Q Uh-huh.

11 A I brought that name up to Paul -- or,
12 I'm sorry, to the team, and the answer was no, not
13 there.

14 Q The answer was --

15 A Or the answer to your question
16 regarding communication with that person.

17 Q No, no, the -- did Mr. Maggio say --
18 did he know whether Ms. Ridlehoover was there
19 during the day or he just didn't --

20 A He didn't know.

21 Q Okay. Do you know the name Alex
22 Cruce, C-R-U-C-E?

1 A I do.

2 Q And was that a name that you raised
3 with them?

4 A It is.

5 Q And what did they say?

6 A There was no interaction.

7 Q That's not a name that they
8 recognized?

9 A That is not a name they recognized.

10 MR. CROSS: All right. Let's go off
11 the record and take a short break, if we can.

12 VIDEOGRAPHER: The time is 3:27 p.m.
13 We are off video record.

14 (Recess from 3:27 p.m. to 3:49 p.m.)

15 VIDEOGRAPHER: The time is 3:49 p.m.
16 We are back on video record.

17 MR. CROSS: All right. I'm just
18 about done. Just for the record, we've marked as
19 Exhibit 28 the check from Sidney Powell's
20 organization, Defending the Republic, for the
21 Coffee County work.

22

1 (Felicetti Deposition Exhibit Number 28
2 marked for identification.)

3 BY MR. CROSS:

4 Q I do have a few follow-up questions
5 for you.

6 Were you able to confirm whether the
7 data that was copied from Coffee County is still on
8 your ShareFile site today?

9 A It is not.

10 Q It is not?

11 A No.

12 Q When did that come down?

13 A Summer.

14 Q This past summer?

15 A Yes.

16 No, last summer. I apologize.

17 Q Summer of 2021?

18 A Yes.

19 Q Oh, okay.

20 And who made the decision to take it
21 down?

22 A I believe Paul Maggio.

1 Q And what was the impetus for taking
2 it down?

3 A The cost, the fees associated with
4 keeping the data up as one reason.

5 Q Okay. Was there a directive from any
6 of the clients to take the data down?

7 A Not that I'm aware of.

8 Q Was there any complaint from any
9 client that the data was taken down?

10 A Not that I'm aware of.

11 Q Okay. Oh, were you able to figure
12 out whether they had mislabeled some files as ICP
13 instead of ICC?

14 A Yes.

15 Q And had they done that?

16 A They had.

17 Q Okay. So some files initially
18 labeled ICP were from the ICC and then they were
19 corrected to be called ICC?

20 A Yes.

21 Q Okay. And were you able to get any
22 more insight into the work that they did to copy

1 data from the ICX, the touchscreen machines?

2 A The ones we're calling BMD, right?

3 Q BMDs.

4 A They were attempted to be collected,
5 but we believe they were not collected, because not
6 only were they not on -- they were not on the chain
7 of custody, when they were running Android OS, they
8 were not collected.

9 Q Okay. So there was an effort made to
10 collect data from the BMDs, but the -- the -- your
11 belief at this point is that that effort failed?

12 A That is correct.

13 Q Was there -- apart from the effort to
14 copy the BMDs -- well, actually, let me just ask it
15 this way: Was there any device or equipment in the
16 office that the team was told at some point, "Do
17 not copy that"?

18 A No.

19 Q Was there any device or equipment in
20 the office that the team on its own decided not to
21 copy?

22 A No.

1 Q Was there any device or equipment
2 that might possess data in the office that the team
3 is aware was there and they made no effort to copy?

4 A I don't know. I don't think so.

5 Q Okay. Did you ask anyone on the team
6 whether they had any communications with someone
7 named Garland Favorito?

8 A I did.

9 Q And what was the answer?

10 A I believe the answer was no, but
11 there were conversations had with Garland Favorito.

12 Q And who had those communications?

13 A Paul Maggio.

14 Q And what can you tell me about those?

15 A Just that they spoke about potential
16 work.

17 Q When was that?

18 A I don't know.

19 Q Before or after the Coffee County
20 work?

21 A I believe before.

22 Q Okay. Were there any communications

1 with Mr. Favorito regarding Coffee County
2 specifically or was it more general about accessing
3 equipment in Georgia?

4 A I don't know.

5 Q Okay. Was any of the Coffee County
6 data shared with Garland Favorito?

7 A I would have to look on the
8 ShareFile.

9 Q So if it was, it should be reflected
10 on the ShareFile?

11 A Yes, sir.

12 Q Okay. The one -- the one issue with
13 the ShareFile though, is the ShareFile log only
14 shows people who got access to the data through the
15 ShareFile, right?

16 A Yes.

17 Q Okay. But we also know that on at
18 least one occasion a hard drive of that data was
19 shipped directly to Stefanie Lambert, right, we saw
20 the e-mails?

21 A Yes.

22 Q So the ShareFile site doesn't capture

1 everyone who received the data from Coffee County
2 from SullivanStrickler, right?

3 There's at least one exception?

4 A One exception, yes.

5 Q Okay. Are you aware of anyone else
6 who received data -- Coffee County data from
7 SullivanStrickler through means other than the
8 ShareFile site?

9 A I am not.

10 Q Was that something that you looked
11 into?

12 A We did, yes. I looked into that.

13 Q Okay. And --

14 A Sorry.

15 Q No, please go ahead.

16 What can you tell me about the steps
17 that were taken to try to collect data from the
18 BMDs? What was the method?

19 A The only method that would have been
20 feasible -- and this is -- I wasn't there -- would
21 be to utilize Cellebrite, because of the Android OS
22 that it has on the back-end --

1 Q Okay.

2 A -- as far as the operating system.

3 So I would think Cellebrite would have been
4 utilized.

5 Q Okay. And do you have any -- any
6 information about why the team was unable to copy
7 data from the BMDs, assuming that's the case?

8 A I do not, just that it -- they
9 failed. That's all.

10 Q Okay.

11 A The collection failed and I don't
12 know why.

13 Q Okay. I do not have any further
14 questions. Just a few quick things similar to what
15 we talked about earlier. We do want to get the
16 complete ShareFile logs.

17 A Oh, as far as the ShareFile logs,
18 what you have is what there is. There's a timeline
19 limitation on ShareFiles' ability to produce logs
20 after a certain time frame.

21 Q Okay. Let me make sure I understand
22 that, because the logs that we have, it looks like

1 it cuts off toward the end of February 2021 --

2 A Correct.

3 Q -- but the ShareFile was up through
4 the summer of 2021, which would be more recent in
5 time. So shouldn't we have logs at least from that
6 time period?

7 A I don't know.

8 Q Okay.

9 A I don't know the -- the -- based on
10 the limitations of that, I don't think so, because
11 there's a year limitation of holding data on
12 ShareFile, the way it can run reports.

13 Q Why would you have older ShareFile
14 logs as opposed to more recent ones?

15 Because what we're looking for is
16 more recent logs. So since -- right, I get --

17 A But the data was taken down over --
18 if the data was taken down, it would have been a
19 year ago.

20 Q Uh-huh.

21 A So to go back and try to run reports
22 against data that's over a year old, I think -- I

1 believe, from the way I understand it, that
2 SharePoint has a limitation -- SharePoint --
3 ShareFile has a limitation on being able to provide
4 those reports.

5 Q So how did you get the reports from
6 an earlier period?

7 A Because the data was up, the request
8 was made earlier. So I think the report was
9 generated from -- in December maybe.

10 MR. COLEMAN: September.

11 THE WITNESS: September to March,
12 right? I was just trying to figure this out. So
13 yeah, the report that was created and given to you
14 was created during the time frame of -- within a
15 year of the data still being up.

16 MR. BROWN: Who asked for it?

17 MR. CROSS: Well, yeah, hold on.

18 Hold on.

19 MR. BROWN: I'm sorry.

20 BY MR. CROSS:

21 Q So we served a subpoena on
22 Mr. Maggio -- I think in maybe June is when the

1 subpoena went in. So are you saying that when the
2 subpoena came in, it was with -- okay.

3 MR. COLEMAN: So you're having the
4 same --

5 THE WITNESS: Yeah, I don't -- I
6 don't know --

7 MR. COLEMAN: The document that
8 you're referencing was created at that time -- back
9 in March of '21.

10 MR. CROSS: Okay.

11 MR. COLEMAN: That's the --

12 MR. CROSS: Yeah.

13 MR. COLEMAN: If the time frame that
14 was requested, right, was September through --
15 through March, when it was created, right? And so
16 the document -- that document was generated back
17 then and then it was stored somewhere.

18 MR. CROSS: I see.

19 MR. COLEMAN: In response to the
20 subpoena, that document that had been previously
21 created is what got produced.

22 MR. CROSS: I see.

1 MR. COLEMAN: It's not possible now
2 to now go back and regenerate a new fresh file.

3 MR. CROSS: Got it. And I thought
4 that's where we were going.

5 BY MR. CROSS:

6 Q So to Bruce's question: What was the
7 purpose of creating -- the ShareFile log that we
8 have today, what was the purpose of creating that
9 in March of last year?

10 A September.

11 Q Oh, sorry, September.

12 A September of last year.

13 It is also common practice for us to
14 look at activity in logs for ShareFile. So that
15 may have been one reason why.

16 Q But do you know why it was created?

17 A I do not.

18 Q Do you know who made the request to
19 create a snapshot of downloads for that particular
20 window of time?

21 A I would assume --

22 Q I don't want you to guess. If you

1 don't know, just say you don't know.

2 A I don't know.

3 Q Okay. But somebody made a decision
4 in September of last year to create a ShareFile log
5 for the specific window of time that's captured in
6 the log that was produced?

7 A Correct.

8 Q Okay. And you don't -- you don't
9 have any insight why someone didn't capture the
10 full time period of the ShareFile site?

11 A Correct.

12 Q And it's not possible to do that now?

13 A It is not.

14 Q Okay. And if you wanted to find out
15 why that particular window was created for a log,
16 who would you ask?

17 A Paul Maggio.

18 MR. CROSS: Okay. The other thing
19 that I was just going to raise is we didn't -- the
20 download -- sorry.

21 The ShareFile log showed that there
22 was some data uploaded by Doug Logan, for

1 example. And so to the extent that there's data
2 on the ShareFile site that has not been produced
3 to us, we would ask for production of that, to
4 the extent that you still have it or it's
5 accessible.

6 BY MR. CROSS:

7 Q Oh, and then one other question.

8 So we've seen a couple of new
9 documents today, the check from Sidney Powell's
10 organization, the subpoena from Fulton County.

11 Are there any other documents you
12 have with you or that you looked at for your
13 deposition that you have not yet shared with us?

14 A No. Everything that I've looked at
15 has been -- was produced. And aside from the
16 Fulton County subpoena that I shared with you
17 today.

18 Q And the check?

19 A And the check.

20 Q Okay.

21 A Okay.

22 Q Okay. So everything else in this

1 stack, to the best of your understanding, is
2 materials that were produced to us?

3 A It definitely is, yes.

4 Q Okay. And the notes you've looked
5 at, those are notes that you took during your
6 communications to prepare for today?

7 A Yes.

8 Q Okay.

9 MR. CROSS: Would you guys have an
10 objection to us getting his notes?

11 No? Okay. All right.

12 MR. COLEMAN: I'll make a copy also.

13 MR. CROSS: Okay. If it's possible
14 to get those scanned today --

15 MS. CLARK-PALMER: Yeah.

16 MR. CROSS: -- we can just mark them
17 before the deposition ends just so we can get that.

18 MS. CLARK-PALMER: Yes.

19 MR. CROSS: That would be great.

20 Thanks, Amanda.

21 I don't have anything else.

22 Bruce, it is now your turn to ask

1 questions.

2 EXAMINATION BY COUNSEL FOR COALITION PLAINTIFFS

3 BY MR. BROWN:

4 Q I have a lot of questions. Just
5 kidding. Okay. All right. Thank you for your
6 time today. We really appreciate it. I'm going to
7 go over some questions. They are going to be
8 overlapping or duplicative, but they'll be quick, I
9 hope.

10 MR. BROWN: If we can go back to the
11 ShareFile list, David.

12 MR. CROSS: Yeah.

13 BY MR. BROWN:

14 Q If you go to Exhibit 17, if you go to
15 page 140, which is the page that has the Doug Logan
16 uploads on that.

17 A Am I on the wrong --

18 MR. CROSS: No, no, this one.

19 THE WITNESS: Oh. All right. Let's
20 see.

21 MR. CROSS: There's another copy of
22 that. I'm sorry.

1 THE WITNESS: I'll find it here.

2 Sorry about that.

3 BY MR. BROWN:

4 Q No, no, it's all good.

5 If you look at page 140, you'll see a
6 number of uploads that are just the week after the
7 main upload that was done by SullivanStrickler --
8 by Doug Logan. Do you see that on the 16th?

9 A Yes, sir.

10 Q And you may have been asked this, but
11 is there any way that we could find out now what he
12 uploaded?

13 A I don't know. I mean, if we -- if I
14 make a call to the office, maybe.

15 Q Well, it's just the -- the -- I know
16 that the ShareFile site is no longer active --

17 A Yeah.

18 Q -- correct?

19 But is what was up there in your --

20 A Oh, I see.

21 Q -- in your possession?

22 Do you follow me?

1 A Yeah. Everything was downloaded to
2 disk, so a preservation copy was made of anything
3 that would be there. So this information would be
4 on the preservation disk.

5 Q Including things that were uploaded
6 by others?

7 A Yes.

8 Q Okay.

9 A Yep.

10 Q Looking -- without looking at your
11 preservation disk, but just looking at -- at this
12 report, can you tell what or why things were being
13 uploaded by Doug Logan during that time frame?

14 A I can't.

15 Q You were asked a question about
16 Garland Favorito.

17 A Yes, sir.

18 Q Are you aware of -- other than
19 Garland Favorito, are you aware of any other
20 requests of your company to do any work in Georgia
21 prior to the work that you did for Sidney Powell?

22 A Let me look through this.

1 Yeah, there was no other request for
2 other work in Georgia that I know of.

3 Q Okay. Is the firm aware of any other
4 forensic work like yours being done in Georgia
5 around the same time frame?

6 A I don't know.

7 Q Okay.

8 A Are you asking -- I'm sorry. At the
9 same locations or --

10 Q Anywhere in Georgia.

11 A Just forensic companies doing work,
12 forensic work?

13 Q Doing work for -- fair enough.
14 Doing work with respect to elections
15 information and data.

16 A I don't know.

17 Q Okay.

18 A I don't know.

19 Q You may have covered this, but there
20 is a Todd S. that's mentioned in that file. Do we
21 know who that is?

22 A We do not.

1 Q Okay. You have been asked about
2 contacts from the -- anybody from the State, from
3 the Secretary of State, et cetera, and your
4 response was limited to the subpoena that you
5 received recently.

6 You with me?

7 A Yes.

8 Q Did your firm informally come into
9 any knowledge about the Secretary of State doing
10 any kind of investigation into Coffee County?

11 A I don't know.

12 Q Okay. Do you know who Tony Rowell
13 is, R-O-W-E-L-L?

14 A Anthony Rowell? No, per my
15 discussion with the team.

16 Q Okay. You mentioned that there was
17 an external hard drive that wasn't within one of
18 the components, but just an external hard drive
19 that was imaged --

20 A Yes.

21 Q -- by your firm.

22 What was on that drive, do you know?

1 A I don't know.

2 Q Okay. Do you know how many drives
3 your firm took down there to use to do the -- to do
4 the imaging?

5 A They used -- oh, let's see, I know
6 for the thumb drives they used the one-terabyte
7 drive and broke it down. So that was one drive.
8 For the server, I believe, two. But I don't know
9 the answer. Maybe three or four drives, but that's
10 purely guessing.

11 Q And those would be just drives that
12 you have in stock that you use?

13 A Yes, sir.

14 Q Okay. We were going over the -- the
15 copy of the log files that was actually made
16 before, produced to us recently, the log files here
17 in the time range that was accessible to the
18 ShareFile.

19 A Oh, yeah. Yes.

20 Q Okay. At the time that those were
21 made, you would have had more recent information if
22 it was printed out, right?

1 A I don't know.

2 Q Okay.

3 A If it was -- the last date on the
4 report was the 26th --

5 Q Of February?

6 A -- of February.

7 Q Right.

8 A And if -- the report was run from
9 September to March 1st, I believe, so maybe not,
10 but I don't know specifically.

11 Q Did -- did your firm ever hear
12 anything about Misty Hampton being fired?

13 A I don't know.

14 Q You don't know anything about that?

15 A No.

16 MR. BROWN: I have a long list of
17 things I need to check through to make sure that
18 we've covered everything, so hang on.

19 VIDEOGRAPHER: Do you want to go off?

20 MR. BROWN: No.

21 MR. RUSSO: While you're looking, do
22 you want me to ask some questions, Bruce?

1 MR. BROWN: Yeah, go ahead.

2 THE WITNESS: I can talk about
3 basketball. That's more fun.

4 MR. RUSSO: Sure, let's go.

5 BY MR. BROWN:

6 Q Just a couple more.

7 A Yes, sir.

8 Q I want to make sure I understand
9 how -- what we know about how the team copied the
10 data from the poll pads.

11 A Sure.

12 Q And could you just review again sort
13 of the process of copying from the poll pads?

14 A Okay. We utilized Cellebrite, which
15 is an industry standard forensic tool for
16 collecting and tabulating tablets. And so we
17 booted off the machine using Cellebrite, connected
18 to the poll pads, and created forensic images of
19 those devices without leaving a -- a footprint on
20 the devices. So we'd point to it, grab the image,
21 put it on a destination drive, and then upload them
22 to ShareFile.

1 Q As far as you know, did the team
2 collect everything that was on the poll pads or
3 some subset of what was on the poll pads?

4 A As far as I know, they collected
5 everything. They were full forensic images.

6 Q The EMS has within it two hard
7 drives, right?

8 A Two or more, yes.

9 Q Okay.

10 A But two --

11 Q But all of them were copied?
12 Whatever was in there was copied?

13 A Yes, correct.

14 Q Okay.

15 A There were two drives -- I shouldn't
16 say that. There were multiple drives. I don't
17 know specifically, but they were mirrored for
18 back-up. They were being protected. So protected
19 but for redundancy, so in case one of the drives
20 failed, the other one could pick up. So we imaged
21 both.

22 Q Okay. And in the ShareFile folders,

1 I think it -- does it -- let me back up a little
2 bit.

3 A Sure.

4 Q The upload -- and you can look at the
5 old document or just -- just from your memory, but
6 when someone uploads something to the ShareFile,
7 there's a description of the file. That
8 description would be automatically generated by
9 whatever file is being uploaded, correct?

10 A As I understand it, yes.

11 Q Okay. And so whatever -- whatever --
12 the name is going -- the name is going to follow it
13 up there --

14 A Correct.

15 Q -- right?

16 And then the far column on the right
17 is an event number. And could you just describe
18 what that is?

19 A I can't.

20 Q Okay.

21 A I believe it's a hash value that's
22 created of the file, but I'm not 100 percent

1 certain. It looks like a -- it looks like a hash
2 value to me, but I'm not sure.

3 Q Okay. And it would be a hash value
4 that's generated by a ShareFile, correct?

5 A Correct.

6 Q Okay.

7 A And this is purely -- I'm just
8 guessing here, but if -- it can be utilized as a
9 hash value to match it to the original so we can
10 show a true preservation if you upload or download
11 it. I could be wrong, but . . .

12 Q And the -- I believe very few of the
13 users had the authority to change the data on the
14 ShareFile, correct?

15 A That is correct.

16 Q But they could download it, change
17 it, and then upload it, correct?

18 A They could.

19 Q So as far as you know, your company
20 hasn't heard from Dominion at all about this?

21 A As far as I know, they have not.

22 Q Do you know if Scott Hall ever

1 obtained log-in credentials?

2 A For the --

3 Q The ShareFile.

4 A -- ShareFile?

5 I don't know. It would be on the
6 ShareFile log if he --

7 Q But if it's not on that, you have no
8 knowledge of it?

9 A Right.

10 MR. BROWN: Okay. That's all I've
11 got. Thank you.

12 EXAMINATION BY COUNSEL FOR STATE DEFENDANTS

13 BY MR. RUSSO:

14 Q All right. Good afternoon,
15 Mr. Felicetti. I'll try to be quick because I know
16 you want to get home to your wife for her birthday.

17 A She doesn't want me to get home, so
18 take your time.

19 Q That's no problem. That sounds like
20 something I would hear in my house. I just have a
21 few -- a few questions for you.

22 You mentioned earlier that

1 SullivanStrickler attempted to image the BMDs, the
2 ballot-marking devices, but that failed --

3 A Yes, sir.

4 Q -- correct?

5 Do you know how many devices,
6 ballot-marking devices, they -- SullivanStrickler
7 attempted to image?

8 A I don't know. I would think they
9 would try to image all of them, but I don't know.

10 Q And do you know what -- what the
11 process SullivanStrickler used to attempt to image
12 those devices?

13 A I believe it was utilizing Cellebrite
14 because --

15 Q Okay.

16 A -- it is the technology that runs the
17 BMDs.

18 Q Okay. So that's a similar technology
19 to what was used for the poll pads?

20 A Correct.

21 Q Okay. And do you know how many poll
22 pads SullivanStrickler imaged or attempted to

1 image?

2 A I don't know, but it would be
3 identified in the produced chain-of-custody log, in
4 that tab, in that spreadsheet. I don't know off
5 the top of my head.

6 Q I want to, I guess, turn to
7 Exhibit 12. Do you --

8 A I guess I don't have -- I have them
9 here.

10 Q Exhibit 12 is the list of pictures,
11 yeah. That's right, I think her name was Jackson.
12 You testified that Ms. Jackson took those pictures?

13 A Yes. Yes, sir.

14 Q Okay. And if you could turn to the
15 page that's Bates labeled -- it's -- the last three
16 numbers are 263.

17 A Yes, sir.

18 Q And it appears to be a Dell laptop?

19 A Yes.

20 Q And are you familiar with what --
21 what this laptop was used for?

22 A I am not. I know a laptop was

1 forensically captured.

2 Q And I noticed there's a tag on it,
3 and I think Mr. Cross asked you earlier, the tags
4 on these flash drives, that they were done by
5 SullivanStrickler, right?

6 A Yes. That looks like one of our
7 bootable DFR collection devices.

8 Q Okay. And it looks like it says
9 "DFIR" --

10 A Yes, that's it.

11 Q -- on it.

12 A Yeah.

13 Q Okay. And do you know what type of
14 flash drive -- the manufacturer of that flash drive
15 is? Can you tell?

16 A I don't know. I'm sorry.

17 Q And I know earlier you were asked a
18 question about Samsung flash drives. Is that --
19 does that look like -- if you're familiar with
20 flash drives that you use at SullivanStrickler,
21 would that be a Samsung?

22 A It does look like a Samsung.

1 Q Okay. And you mentioned that Sidney
2 Powell is the attorney for the Georgia work. She
3 had the contract with SullivanStrickler?

4 A Yes, sir.

5 Q And Defending the Republic is the
6 client, correct?

7 A Yes, sir.

8 Q When did Ms. Powell first contact
9 SullivanStrickler about this project?

10 MS. CLARK-PALMER: About the Coffee
11 County project?

12 MR. RUSSO: Yes.

13 THE WITNESS: Coffee County was early
14 in January, I think. I'll have to look in the
15 e-mails that was produced. I don't know off the
16 top of my head. I'm sorry.

17 BY MR. RUSSO:

18 Q Okay. And the contract that she
19 signed was dated December 6th.

20 A Oh, yes. So it would have --
21 originally, it was Jim Penrose and Doug Logan that
22 made the initial reach-out. So on behalf of Sidney

1 Powell, I believe.

2 Q Okay. And that's -- that's actually
3 what I was going to ask you; is how is that
4 relationship -- if you all had a prior relationship
5 with Ms. Powell or --

6 A No.

7 Q Okay. And you mentioned Mr. Penrose
8 and Doug Logan. The -- their e-mail accounts that
9 we looked at earlier, the e-mails would indicate
10 they're from fightbacklaw.law. Are you familiar
11 with -- with Fight Back Law?

12 A I am not.

13 Q All right. And did -- did
14 SullivanStrickler have any communications with --
15 with Lin Wood?

16 A About Coffee County?

17 Q About Coffee County.

18 A There is no communication with Lin
19 Wood.

20 Q Okay. And was there any -- or do you
21 know the name Julia Haller, who was with Defending
22 the Republic?

1 Does that sound familiar? It's

2 H-A-L-L-E-R.

3 A No. No. I'm sorry.

4 Q You testified earlier that Cathy
5 Latham and Scott Hall gave direction about what to
6 copy --

7 A Well --

8 Q -- in Coffee County?

9 A Cathy Latham and Misty Hampton gave
10 direction. And Scott Hall also was generally
11 saying, "Make sure you get everything." But
12 that -- you know, as far as, "Grab that thumb
13 drive, grab that," that wasn't necessarily what his
14 role was.

15 Q And now, do you know if there was
16 anyone who -- and they were all on-site, right?

17 A Yes, sir.

18 Q Now, do you know if there was anyone
19 who was not on-site who was also directing what
20 to --

21 A I don't know.

22 Q -- to get?

1 Okay. Do you know if the Coffee
2 County project for Ms. Powell, for Sidney Powell,
3 was for litigation purposes?

4 A I do not know.

5 Q Do you know that Cathy Latham was a
6 plaintiff in a lawsuit that was filed by
7 Ms. Powell --

8 A No.

9 Q -- in Georgia?

10 A No, I didn't know that.

11 Q Did SullivanStrickler have any
12 communications with an attorney named Harry
13 MacDougald?

14 A It doesn't --

15 MR. CROSS: Can you spell that,
16 Vincent?

17 MR. RUSSO: M-A-C-D-O-U-G-A-L-D.

18 THE WITNESS: I don't know.

19 BY MR. RUSSO:

20 Q Was that -- is that something that
21 you guys inquired about?

22 A I did not. If his name wasn't in the

1 subpoena as somebody, I -- I just --

2 Q So anyone whose name is on the
3 subpoena, you did not ask about?

4 A Correct. We would --

5 MR. COLEMAN: No, no. Hold on. Can
6 you repeat that question?

7 BY MR. RUSSO:

8 Q Anyone whose name was not in the
9 subpoena, you did not ask about?

10 A Correct.

11 Q Okay. That might be all of my
12 questions. Let me consult here.

13 So you mentioned your best
14 practices -- or SullivanStrickler's best practices
15 earlier at the -- at the start. And you -- you
16 indicated that the forensic imaging that
17 SullivanStrickler does, the practices only take --
18 take data off. They do not put data on any of the
19 equipment, correct?

20 A Yeah, well, we don't take --

21 Q I'm sorry.

22 A -- data off. It images the data.

1 Yes, images the data.

2 Q Do you know if SullivanStrickler, in
3 that process, anything would have been done --
4 strike that.

5 Do you know if in SullivanStrickler's
6 process for imaging -- conducting forensic image,
7 any data would go onto the equipment? So putting
8 data on the equipment rather than simply imaging
9 what was on there?

10 A It depends on what the forensic
11 collection requirements are and what the devices
12 are. For this particular engagement, speaking for
13 Coffee County, no. It was no footprints. So pull
14 the data off, don't install.

15 Q Do you know the -- I'm sorry. Go
16 ahead.

17 A No, no, you go ahead.

18 Q I was going to ask, do you know if
19 the DFIR -- and I'm going to get this wrong -- but
20 the device, it could do that, leave a footprint?

21 A Well, I mean, you could if you
22 manually on purpose used a Linux command to write

1 data to something, but that -- I mean, you could do
2 that, you could walk up to a machine and type on
3 it, too, so I don't --

4 Q Okay.

5 MR. RUSSO: I have no further
6 questions. I appreciate it. Thank you.

7 THE WITNESS: You're welcome.

8 MR. CROSS: Could I ask you just one
9 additional question?

10 EXAMINATION BY COUNSEL FOR CURLING PLAINTIFFS

11 BY MR. CROSS:

12 Q We looked at a USB stick that
13 referenced ICX install. Do you know what was on
14 that?

15 For example, did it have the ICX
16 application on it?

17 A I don't know.

18 Q And who would you ask?

19 A It was a thumb -- a thumb drive,
20 correct?

21 Q Right.

22 A Probably Karuna.

1 Q Okay.

2 MR. CROSS: Okay. No further
3 questions.

4 MR. COLEMAN: Anybody else have
5 questions?

6 MR. RUSSO: Thank you.

7 THE WITNESS: Thank you.

8 MR. CROSS: Thank you.

9 VIDEOGRAPHER: The time is 4:28 p.m.
10 This concludes the videotaped deposition. We are
11 off video record.

12 (Whereupon, at 4:28 p.m., the
13 video-recorded deposition of DEAN M.
14 FELICETTI was concluded; signature
15 reserved.)

16

17

18

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



FELICIA A. NEWLAND, CSR
Notary Public

My commission expires:
September 15, 2024

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

A C K N O W L E D G E M E N T O F
D E P O N E N T

I, DEAN M. FELICETTI, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes or corrections, if any, appear in the attached errata sheet signed by me.

Date

DEAN M. FELICETTI

5384640

1 Donna Curling, et al. vs. Brad Raffensperger, et al.

2 DEAN M. FELICETTI

3 INSTRUCTIONS TO THE WITNESS:

4 Please read your videotaped deposition over
5 carefully and make any necessary corrections. You
6 should state the reason in the appropriate space on
7 the errata sheet for any corrections that are made.

8 After doing so, please sign the errata sheet
9 and date it.

10 You are signing same subject to the changes you
11 have noted on the errata sheet, which will be
12 attached to your deposition.

13 It is imperative that you return the original
14 errata sheet to the deposing attorney within thirty
15 (30) days of receipt of the deposition transcript by
16 you. If you fail to do so, the deposition
17 transcript may be deemed to be accurate and may be
18 used in court.

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

Veritext Legal Solutions
1250 Eye Street, N.W., Suite 350
Washington, DC 20005
(202) 857-DEPO

E R R A T A S H E E T

Case Name: Donna Curling, et al. vs. Brad
Raffensperger, et al.

Witness Name: DEAN M. FELICETTI

Deposition Date: September 2, 2022

Page No. Line No. Change/Reason for Change

Signature

Date

5384640

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.