

## Exhibit A

# CHAIKEN GHALI LLP

ONE ATLANTIC CENTER  
1201 W. PEACHTREE STREET, SUITE 2300  
ATLANTA, GA 30309

**Kamal Ghali**  
404.795.5005  
kghali@chaikenghali.com

Atlanta  
Los Angeles  
San Francisco

February 17, 2026

**VIA E-MAIL**

Trent McCotter  
Office of the Deputy Attorney General  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530  
Trent.McCotter@usodj.gov

**Re: *Pitts v. United States*, No. 1:26-CV-00809-JPB (N.D. Ga.)  
Evidentiary Hearing February 27, 2026**

**TOUHY REQUEST – DEMAND FOR TESTIMONY**

Dear Mr. McCotter,

Petitioners in *Pitts v. United States*, No. 1:26-CV-00809-JPB (N.D. Ga.), request the testimony of Special Agent Hugh Raymond Evans at the evidentiary hearing set for February 27, 2026. Special Agent Evans submitted an affidavit in support of a search warrant application for 5600 Campbellton Fairburn Road, Fairburn, Georgia 30213, that led to the seizure of records on January 28, 2026, that are the subject of this case and the February 27 evidentiary hearing. The United States is a party to this case and, in accordance with 28 C.F.R. § 16.23(c), Petitioners submit the following summary of the testimony sought.

Special Agent Evans' testimony is necessary to understand the investigation and evidence on which the search warrant affidavit was based, including Special Agent Evans' assertion that the election records sought in the search warrant could be evidence of violations of 52 U.S.C. §§ 20511 and 20701. Special Agent Evans attested that the facts set forth in the affidavit were based on his personal observations and knowledge, that he had not included in the affidavit every detail of the investigation or of parts of the conversations and statements described in the affidavit, and that he believed the facts he did include were sufficient to establish probable cause. Special Agent Evans' testimony is necessary for the Court to assess each of these statements and evaluate whether the affidavit established probable cause, whether the purported irregularities identified in the affidavit were material to the assertion that there was probable cause to believe a crime had been committed, and whether the affidavit made erroneous statements or omitted material facts.

CHAIKEN GHALI LLP

Page 2

---

Please confirm by no later than Friday February 20, 2026, that you will make Special Agent Evans available to testify at the February 27 evidentiary hearing to allow sufficient time for us to seek relief from the Court if necessary.

Sincerely,



KAMAL GHALI  
CHAIKEN GHALI LLP

*Counsel for Petitioners*

cc: Michael Weisbuch, Office of the Solicitor General;  
Thomas Albus, United States Attorney;  
Y. Soo Jo, Office of the Fulton County Attorney;  
Abbe David Lowell, Lowell & Associates, PLLC;  
John Bolen, Lowell & Associates, PLLC;  
Stephen Jonas, Democracy Defenders Fund;  
Norman Eisen, Democracy Defenders Fund;  
Michael C. Duffey, Chaiken Ghali LLP