

EXHIBIT A

Attkisson v. Bridges, et al; Civil Action No. 1:20-cv-68-RDB

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Baltimore Division

SHARYL THOMPSON ATTKISSON AND SARAH JUDITH STARR ATTKISSON, Petitioners, v. UNITED STATES OF AMERICA; DEPARTMENT OF JUSTICE; UNITED STATES POSTAL SERVICE Respondents.	Civil Action No. 1:20-cv-68-RDB RELATED TO Civil Action No. 1:23-1106
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AFFIDAVIT OF SHARYL T. ATTKISSON

COUNTY OF LOUDON)
)
COMMONWEALTH OF VIRGINIA)

UPON OATH, THE AFFIANT STATES AS FOLLOWS:

1. My name is Sharyl Thompson Attkisson. I am over the age of 18; of sound mind; and the facts in this Affidavit are based on my own personal knowledge.
2. I am one of the Plaintiffs in Civil Action No. 1:20-cv-00068 (*Attkisson, et al v. Bridges, et al*), presently pending in the United States District Court for the District of Maryland.
3. I have prepared this affidavit in support of Plaintiffs' position that we cannot properly oppose a motion for summary judgment without a full and fair chance to conduct adequate discovery from the government, including document production and an opportunity to cross-examine/examine fact witnesses.

4. I along with my family initiated legal action back almost eight (8) years ago in the District of Columbia because we learned from a forensic examination of my CBS computer equipment that an illegal remote intrusion had occurred using tactics that were only available to government sources.

5. Before choosing to pursue litigation, my family unsuccessfully tried to use the Freedom of Information Act (“FOIA”) laws to acquire the information about who was responsible for this conduct, why it was done, and how in this day and age our government could sanction such behavior. Unfortunately, the government stonewalled our efforts under the FOIA laws leading to litigation. I even tried enlisting the assistance of members of Congress to help us simply get answers to questions.

6. Attached as **Exhibit A** is a January 8, 2020, letter from Senator Ron Johnson (Wisconsin) to Attorney General William P. Barr and FBI Director Christopher Wray summarizing the efforts made as of that time to get answers from the government.

7. As noted by Sen. Johnson, the alleged illegal surveillance followed my reporting while at CBS News in February, 2011 about operation “Fast and Furious,” an operation by the Department of Justice's (DOJ) Bureau of Alcohol, Tobacco, and Firearms (ATF) that allowed Mexican cartel members and gun traffickers to illegally purchase firearms and the attacks in Benghazi that resulted in the deaths of U.S. Ambassador Christopher Stevens and three other Americans.

8. As Sen. Johnson states in **Exhibit A**, the compromise of electronic devices conveniently coincided with what the country learned was an unprecedented targeting of investigative journalists using information learned from insiders (whistleblowers) under the Obama administration. For example, it is an established fact that the Department of Justice (“DOJ”), secretly seized phone records from The Associated Press, labeled one Fox News reporter [James Rosen] a criminal co-conspirator, sought grand jury testimony from another reporter, and secretly obtained a search warrant for Mr. Rosen's personal emails in violation of longstanding government policies and practices.

9. As Sen. Johnson documents, in 2013, Sen. Tom Coburn – the then-Ranking Member of Committee on Homeland Security and Governmental Affairs -- also sought answers from then-Attorney General Eric Holder regarding the government's actions in the hacking and surveillance of Ms. Attkisson's computers. In 2014, Sen. Coburn sent a second letter noting that

DOJ's response answered none of his questions. In 2015, as Chairman of the Senate Judiciary Committee, Sen. Charles Grassley also sought answers in the case. And in March, 2018, Sen. Johnson himself wrote to the DOJ's Office of the Inspector General (DOJ OIG). Over that almost five (5) year period, the government effectively and successfully resisted providing any answers or insights even to these Senators.

10. I and my family have now been seeking answers from the government for almost a decade, and have now approved the filing of an Administrative action explaining that we have suffered a legal wrong because of agency action, or inaction that is prejudicial to the administration of justice, or adversely affected or aggrieved by agency action within the meaning of 5 U.S.C. § 702, and that I am entitled to judicial review due to the stonewalling. We are seeking to compel action, including final action, which we believe has been unlawfully withheld or unreasonably delayed under 5 U.S.C.A. § 706(1).

11. As we have repeatedly explained to the government over the past decade, the discovery we seek from our own government includes documents and testimony that directly relate to what we claim were illegal intrusions of my computer while employed as an investigative news journalist at CBS News in Washington, D.C. I have personally participated in assisting with *Touhy* responses, repeatedly providing as much detail as I can possibly provide given that I do not already have access to the information. If we knew what all of the facts were that we were seeking, I would not need to seek it. My responses have been patiently detailed, time and again, with what a reasonable person could expect to find and why it is relevant to the inquiry.

12. The discovery sought was first requested in this case (the Maryland litigation) in July, 2022, by way of Notice of Deposition and the issuance and service of Rule 45 subpoenas. The witnesses were all subpoenaed between July 15, 2022, and July, 2022, and included:

USPS 30(b)(6)

DOJ 30(b)(6)

Michael Graham (USPS)

William Blier (DOJ)

Keith Bonanno (DOJ)

Dean Boyd (DOJ)

Michael Horowitz (DOJ)

John Duckworth (USPS)

Shawn Henry (DOJ)

13. In order to help the Court better understand the background of our requests, and dispel the ridiculous claims of Defendant Bridges that our efforts have been lacking, I will summarize the history of the efforts we have engaged in to obtain the information sought.

FACTUAL BACKGROUND

14. Between 1994 and 2014, I was employed by CBS News, including as an investigative journalist.

15. Two of my investigations conducted in the 2011 to 2013-time period, *Fast and Furious* and *Benghazi*, ultimately received national recognition for investigative reporting by both the International Emmy Awards and the Edward R. Murrow Awards.

16. Both investigations relied upon sources (whistleblowers or “leakers”) inside the Obama Administration who sought me out to expose corruption and falsities that were being told to the American public by our own government. Although my reporting was apolitical, the revelations naturally proved sensitive and embarrassing to certain individuals within the Obama Administration, as they would have for any Administration. As the documents later showed, my and our (CBS) reporting was considered influential and potentially extremely damaging to the Administration’s political standing.

17. The first of these investigations was about the government’s controversial, secret strategy of allowing thousands of weapons to be trafficked or “walked” into the hands of Mexican drug cartels, often with federal agents watching it happen. The largest known case that utilized this disputed strategy was an undercover operation known as *Fast and Furious* by the United States Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) under the United State Department of Justice (“DOJ”).

18. In May 2010, though it was not publicly known at the time, the DOJ secretly monitored Fox News reporter James Rosen as part of an investigation into who in the government was “leaking” information to him. As part of its probe, and with the personal approval of Attorney General Eric Holder, the government obtained secret warrants for Rosen’s personal email and phone information, and tracked his comings and goings to and from the State Department. To justify its actions and keep the warrants secret, the government labeled Rosen “a criminal co-conspirator,” and a “flight risk,” though he was never charged with a crime. When the Attorney General’s conduct was revealed three years later, the unprecedented actions against Rosen in the

name of identifying a government “leaker” drew universal condemnation from First Amendment and civil rights advocates.

19. In December of 2010, a U.S. Border Patrol Agent named Brian Terry was murdered by Mexican cartel criminals near the border in the Arizona desert. The DOJ learned, but chose to keep secret, that the killers used weapons that had been trafficked under the watch of ATF agents in Operation *Fast and Furious*.

20. Although it was not public at the time, an internal email entitled “*Obama Leak Investigations*,” written by an executive at the government intelligence contractor *Stratfor*, dated September 21, 2010, four months after the actions against Rosen, stated that “*Brennan¹ is behind the witch hunts of investigative journalists learning information from inside the beltway sources. Note -- There is specific tasker from the [White House] to go after anyone printing materials negative to the Obama agenda (oh my.)*”

21. The disclosure of this internal document was shocking to everyone, especially the journalism community. The fact that the White House was directly implicated in a written communication with attacking journalists was shocking.

22. Shortly after, my first reports on *Fast and Furious* aired on the *CBS Evening News* in early 2011, when ATF inside sources stepped forward to expose the “gunwalking,” and its role in Agent Terry’s death, to both me and to Sen. Charles Grassley. My public reporting relied on confidential sources in the Obama Administration, as well as an exclusive interview with then-sitting ATF Special Agent John Dodson, who worked on a team ordered to “let guns walk”, and who personally revealed facts associated with the fiasco.

23. Immediately after our first report aired, though it was not publicly known at the time, officials in the Attorney General’s office, including General Holder and his chief aide Tracy Schmalzer, exchanged sometimes frantic emails with other federal officials about me and my reporting. This is a proven fact because the emails were later publicly disclosed and showed that these officials made statements including, “*We agree that it’s time to go on the offensive*” (p. 79); “*Not good*” (p. 85); “*NPR...said this is as big as Ruby Ridge*” (p. 85); “*Bad story coming on CBS Evening News tonight.*”

¹ “Brennan” refers to then-White House Assistant to the President for Homeland Security John Brennan, who later became Director of the CIA.

24. In May 2011, though it was not publicly known at the time, the DOJ's Patrick Deklotz authored an email instructing the Freedom of Information ("FOI") group within DOJ to route all of FOI requests from me — through him.

25. After my October, 2011 report revealing that General Holder had received weekly briefings on the controversial *Fast and Furious* operation, contrary to his denials to Congress, General Holder aide Tracy Schmalzer called me and literally yelled at me on the telephone, while White House spokesman Eric Schultz called and screamed and cursed me about our reporting at CBS.

26. Privately, on October 4, 2011, White House official Eric Schultz and General Holder aide Tracy Schmalzer emailed about me: "*She's out of control*" (p. 232) and "*Her piece was really bad for [AG Holder].*" This too became public much later when the emails were made public.

27. On October 5, 2011, General Holder emailed "*Why don't we...go on the offensive in ways I've been thinking.*" (p. 239) That same day, Deputy AG Kevin Ohlson emailed General Holder, "*This story is gaining traction. You need to stop it from snowballing — now.*" These emails likewise became public information.

28. As I began reporting on *Fast and Furious* in early 2011, using Obama Administration whistleblowers or sources that were "leaking" information about the controversy, my family and I began to notice odd anomalies in our electronic devices, including my CBS laptop computer. These anomalies occurred wherever I was physically located so long as I was on the internet or had access to the internet, which, at my home meant via Verizon's fiber optic service, FiOS.

29. On multiple occasions, including in February, 2012, I contacted Verizon to report and ask them to troubleshoot the ongoing anomalies. Repeated Verizon service calls did not fix the problems, which continued to escalate.

30. My reporting made international headlines and sparked an intense Congressional investigation. Although the DOJ and ATF initially denied the facts that we at CBS reported, officials later admitted, under oath, that they were 100% accurate. General Holder's agency, the DOJ, ultimately issued a letter of apology to Congress for having provided false information early in the proceedings.

31. General Holder ultimately refused Congressional subpoenas to release key documents related to the scandal, and became the first sitting member of the Cabinet of the United States to be held in contempt of Congress.

32. My reporting and documents exposed, among other facts, secret audio recordings with an ATF agents discussing how “toxic” Special Agent John Dodson and his whistleblowing were proving to be and how damaging the case was to the F.B.I. (which was involved in the investigation of Agent Terry’s murder); allegations about a “missing” *Fast and Furious* weapon that had been in F.B.I. custody; the fact that hundreds of crimes, including murders, were being committed with the “walked” weapons on both sides of the U.S.-Mexico border; that General Holder had been repeatedly briefed about *Fast and Furious*, contradicting his sworn, Congressional testimony; documents showing ATF, DOJ, and the White House; including General Holder, his top aide, and a White House aide; expressing anger and alarm over my reporting and discussing ways, in internal communications, to stop or discredit it; and documents showing there were White House communications about the secret gunwalking operations after officials had denied any knowledge of them. Ultimately, President invoked executive privilege for the first and only time in his presidency to shield all related White House documents from Congressional or public view. In 2016, a federal court ruled that the documents withheld by President Obama were not covered by privilege. As a result, some additional documents were released to Congress in 2018, some seven years after the story first broke.

33. In the spring of 2012, the DOJ embarked upon an aggressive, new program of cyber-related strategies of an unspecified nature in the name of national security. This is publicly known because of an announcement later found on the DOJ website.²

34. During the same time frame (2012), however, it was not publicly known that the DOJ had secretly seized personal and work phone records belonging to journalists from the Associated Press (AP) news agency in violation of longstanding DOJ practice. The seizure was made as part of an investigation into who inside the government had “leaked” information to AP. As Americans later learned, the DOJ belatedly notified the AP months later, leading the agency to launch complaints and call the federal actions a "massive and unprecedented intrusion" into how news organizations gather the news.

² It has since been removed, but an archived copy is here: <https://www.justice.gov/archives/opa/blog/new-network-takes-aim-cyber-threats-national-security>

35. In July, 2012, the DOJ initiated a policy designating its U.S. Attorneys' offices to act as "force multipliers" in the agency's stepped-up cyber efforts and use of unspecified cyber strategies, again all in the name of national security. This too was later discovered from a publication on DOJ's website: <https://www.justice.gov/archives/opa/blog/new-network-takes-aim-cyber-threats-national-security>.

36. On October 5, 2012, CBS News aired my first in a series of investigative reports on the deadly terrorist attack on Americans in Benghazi, Libya. The series relied in significant part on Obama administration whistleblowers who voluntarily came forth to provide information that exposed critical lapses of the Executive Branch's handling of the security requests at the U.S. compound in Benghazi, where U.S. Ambassador Christopher Stevens and three (3) other U.S. personnel were killed on September 11, 2012.

37. Three days later -- on October 8, 2012 -- CBS aired another of my investigative reports on Benghazi, including an interview with whistleblower Army Green Beret Lt. Col. Andrew Wood. Wood led an elite, 16-man counterterrorism team in Libya and documented the obvious risks and the U.S. State Department repeated denial of requests for better security prior to the attacks.

38. Those facts and others reported in my series contradicted numerous public statements made by Obama Administration officials, including President Obama, and proved politically embarrassing just weeks before the 2012 presidential election.

39. During the weeks following the airing of Col. Wood's interview, numerous confidential sources in the federal government with links to intelligence agencies voluntarily came forth to inform me that efforts were being made within the Executive Branch to clamp down on "leaks" and to track the leaking of information to specific news reporters, including me personally.

40. That same month -- October, 2012 -- is when I and my family began noticing an escalation of our electronic device problems, including interference and interruption in our computers, mobile phone lines, land lines, and even television service.

41. It was during this time frame that several additional confidential government sources approached me privately and informed me that the Obama Administration was taking "unprecedented" actions against reporters and was likely monitoring my electronic communications due to the nature of my reporting.

42. Shortly thereafter, in November of 2012, a friend with connections to government intelligence agencies noticed that he was unable to communicate normally with me and my family via telephone due to the constant interference and interruptions. When he inquired about the issue, I told him about the warnings I had received that the government was likely “monitoring” me. He offered to have my CBS computer inspected for signs of monitoring.

43. Meantime, in late December of 2012, another friend with U.S. government intelligence experience offered to conduct an inspection of the exterior of my home to see if he noticed any anomalies that might signal a government surveillance effort. During the course of his inspection, he discovered a device attached to our FiOS (Verizon) box outside my home, which was described as an extra fiber optics line that was dangling from the exterior of the box. The device was documented with photographs produced in this litigation.

44. On December 31, 2012, New Year’s Eve, I contacted Verizon to ask whether their technicians might have left the device attached to my equipment. I even offered to send a photograph, but after consulting with a supervisor, the Verizon representative said they could not accept a photograph and stated with certainty that nobody from the company had installed such a device at my home. The Verizon representative suggested that I contact law enforcement to report the incident. I consulted my husband, a former law enforcement official himself, who was out of town, and he advised to wait until he returned home.

45. A short time after the Verizon call, a woman identifying herself as a Verizon supervisor unexpectedly telephone my home and advised that Verizon would be dispatching a technician to my house the following day – on New Year’s Day — to look at the device I had described. I advised her that a New Year’s Day visit was unnecessary, and offered to send a photograph of the stray fiber optics line to save Verizon a trip. The purported supervisor would not accept a photograph and insisted that a technician would visit on New Year's Day.

46. On January 1, 2013, a person representing himself to be a Verizon technician visited our home. He told me that he was my personal contact at Verizon from now on, gave me his business card with his phone number, and urged me to call him personally if I had any more issues. He inspected the outdoor equipment and said he could not explain the presence of the additional fiber optics cable, but quickly used tools to remove it and prepared to leave the premises. I asked him to leave the cable with me, which he said he did not want to do, and he questioned why I wanted him to leave it. After some discussion, during which I was insistent upon him leaving the

cable, the technician left it on an air conditioning fan next to the equipment and left the home. However, when we later went to retrieve the cable for examination by a trained specialist, it had been removed and was gone. I telephoned the Verizon technician daily to ask if he had returned to the house and retrieved the cable, but he never returned any of our calls. The attached device is still missing, but, as noted above, photographs exist and it has been confirmed that the device was one tool available for monitoring electronic traffic.

EFFORTS TO OBTAIN INFORMATION FROM THE FEDERAL GOVERNMENT

47. I immediately reported the computer intrusions to my employer, CBS News, which hired a forensics company, and publicly confirmed the remote intrusions of my computers. During the same time frame – 2013 — several significant events occurred, including National Security Agency contractor Edward Snowden exposing the government’s secretive, mass operations to surveil American citizens; the AP discovering the DOJ had secretly seized its reporter’s records as part of a “leak” investigation; and the public revelation that the government had monitored Fox News’ James Rosen in a “leak” investigation.

48. These events led to Sen. Tom Coburn, as a member of both the Senate Homeland Security and Senate Intelligence Committees, to contact me expressing interest in my case and the implicit privacy and surveillance abuses that were at the center of our problem. He counseled me about non-classified matters he was aware of regarding intelligence agency surveillance of citizens and possible abuses, and sent a letter to General Holder asking a series of questions about the then-known evidence about the remote intrusions of my computers.

49. The DOJ did not respond to Sen. Coburn for five months, and when a response was finally provided, it did not answer any of the Senator’s questions. Sen. Coburn sent a follow-up letter pointing out that none of the questions were answered and that the letter was apparently being ignored.

50. In July, 2013, I personally filed a FOI request with a variety of agencies, including the DOJ, asking for all information that referenced me or the computer intrusions. In August, 2013, the DOJ responded stating that it had no responsive records. I filed an appeal in September, 2013 that included a list of documents that we knew existed despite the DOJ’s insistence that no responsive documents existed. We knew records existed because, at a minimum, Ms. Attkisson had previously submitted to FBI background checks for White House press passes and had had numerous professional communications with the FBI that would be responsive to her request.

51. In December, 2013, after repeatedly denying the existence of any records, the DOJ finally turned over several pages of documents that showed that the FBI had previously opened an investigation into the intrusions into my computers, listing me as a victim. That was all, however, that was produced. I found this quite odd because nobody from the DOJ or the FBI had ever contacted me to pursue an investigation or interview me. The document referred to other existing documents, but the DOJ refused to produce them.

52. In February, 2014, I filed a second set of FOI requests seeking the documents that the DOJ refused to produce. This time, the FBI replied to the FOI and identified 3,500 responsive documents – despite having earlier denied the existence of any responsive documents – and then set forth a printing fee schedule for cost of reproduction and a deadline of 30-days or the request would be closed. The problem was that

53. I did not receive the letter until near the 30-day deadline imposed, so I called the chief agent in charge of FOI requests at the FBI, Agent Hardy, on April 3, 2014, and requested a copy of the 3,500 documents on CD, as permitted. A follow-up letter was sent with the same request. No documents were ever produced.

54. In early June, 2014, following the public disclosure of the remote intrusions, DOJ Inspector General (IG) Agent Keith Bonanno, who was assigned to the IG's investigation into the allegations of intrusions into my home computer, which I requested, advised me that the Agency's report was completed. But after initially telling me I would receive a copy, Agent Bonanno informed me that he was instructed not to share the results without the approval of DOJ IG General Counsel Bill Blier. My repeated requests to Mr. Bonanno for the report received the identical response over the next 60-days. Mr. Bonanno told me to file a Freedom of Information (FOI) request to obtain the report.

55. Separately, in July, 2014, Sen. Coburn made a formal request to the Postal Service Inspector General's (IG's) office to investigate the government U.S. Postal Service IP addresses that forensic investigators found were used to remotely infiltrate my computers. Agents from the Postal Service IG (Duckworth and Graham) contacted me to set up a meeting. At the meeting, Agent Duckworth informed me that they were only interested in the case because "Senator Coburn told him to be interested." The agents refused to answer any questions about the government IP addresses. Mr. Duckworth ignored repeated requests for information from July to September.

56. On September 28, 2014, I filed a FOI with the DOJ IG seeking the report of investigation, all communications, and all notes of the investigation into my home computer. A response was due within about 30-days, but the FOI request was ignored.

57. On November 19, 2014, I filed a FOI lawsuit against the DOJ for failure to comply with the law in providing relevant documents. The DOJ responded by claiming it had no documents to provide, and refused to address what may have happened to the materials that we documented were known to exist including those that had been previously requested on CD.

58. Yet another FOI request, this time to the Director of National Intelligence, ended with a refusal by the Agency to either admit or deny the existence of any responsive records.

59. On December 26, 2014, I authorized my attorneys to proceed with compliance with pre-suit administrative action under the Federal Tort Claims Act, which triggered the litigation that now, in 2023, is continuing.

60. In 2015, Chairman of the Senate Judiciary Committee, Sen. Charles Grassley posed a series of written questions about the computer intrusions to the DOJ, which were likewise ignored.

61. On January 8, 2020, Chairman of the Senate Homeland Security Committee, Sen. Ron Johnson, again sent a list of written questions about my computer intrusions to General Bill Barr and FBI Director Wray. This letter with questions was again ignored. The questions included whether I was ever a subject or target of an investigation and whether any DOJ employees or contractors ever attempted to access my electronics in any form or fashion.

62. The first deposition -- and only deposition -- my counsel was ever authorized or permitted to take in the Virginia litigation was a deposition of Cliff Biram, a representative of the USPS, who confirmed that the government USPS IP addresses found on my computer were in fact owned and maintained exclusively by the USPS, and that those IP addresses had never been used publicly, and were only accessible to federal employees and contractors with special permission. Mr. Biram was killed in a tragic car-pedestrian accident after his deposition as documented in our current efforts to seek the follow-up depositions of the USPS.

THE SUBJECT DISCOVERY SOUGHT FROM THE GOVERNMENT

63. My counsel has been involved in extensive *Touhy*-related communications with representatives of the government detailing what is being sought in discovery; why it is significant

to the litigation; and the role of each person or representative requested. I will not repeat all of those communications, but I will summarize them in the following paragraphs.

64. I authorized my counsel to seek documents and testimony from each witness we identified about facts known or acquired regarding the alleged illegal surveillance conducted of me and my family, including the investigations conducted; the witnesses interviewed; the forensic examinations undertaken; the physical evidence collected and documented; and the communications with us at our home, electronically, and via telephone, and the identity of all individuals involved in the alleged intrusions, including corroboration of facts and details reported by Mr. Ryan White.

65. Each of the witnesses named was personally involved and is reasonably believed to possess factual information relevant to the issues. I know that because each played a role over time in the intrusion-related discussions and investigations, including communications with my family.

66. By way of example, a U.S. DOJ OIG Abbreviated Report of Investigation was authored by Keith Bonanno regarding Case Number 2013-006191 from the “Cyber Investigation Office” and “Unknown” component of the DOJ. However, the only report I was able to access—and only second-hand from a staff member of a Congressman—oddly redacts names of the Special Agent preparing the Report.

67. The same Report verifies that the DOJ Office of the Inspector General (OIG) investigation was initiated based on a complaint I submitted to the OIG Hotline in April 2013, but provides no details about what was done in the investigation all of those months; what was collected; what was reviewed; what facts were learned; and what, if any, factual information was gathered.

68. The relevance of the information I seek from the government is self-evident in that all of it relates to one series of events: the computer intrusions confirmed by multiple forensic sources, and facts supporting attribution of the attacks. The information I seek is not available from other sources because (a) Mr. Biram (USPS) is now deceased after a tragic pedestrian-car accident shortly after his deposition; (b) the information we seek is in the exclusive control of the federal government; (c) efforts to obtain the information through the FOI Act has repeatedly been ignored and failed; and (d) the evidence lies in the possession of the very agencies who have been accused

of the misconduct, including the information necessary to corroborate or refute the information provided by Mr. White and Mr. Bridges.

69. As to Defendant Bridges, I am fully aware of his criticisms of me and my family for relying on the statements of Mr. White due to Mr. White's criminal record and public statements attributed to him about others. What Mr. Bridges' conveniently overlooks is that he too is a convicted felon, just like Mr. White, and, as reflected in his deposition and the public records associated with his criminal conviction, he has been repeatedly described by the prosecution as dishonest, as one who has attempted to obtain identification documents using false information; made false statements to law enforcement officials; falsely reported alleged theft of retirement credentials; and taken illegal or improper efforts to change his name and social security number under seal in court. He has likewise been described as a danger to the community and someone who cannot be believed.

70. As for Mr. White, the information we learned from Mr. White came from an investigator and from Mr. White's own attorney, not from Mr. White himself calling me or us directly. The factual information he did provide was corroborated factually by the following:

- His description of their use of hotel lobbies in Northern Virginia to conduct surveillance was corroborated by forensic findings reported by the forensic vendors examining the computers, a fact which was never publicly reported, meaning that there is no way Mr. White knew that fact from media reports.

- His description of working as an undercover informant for the DOJ and as a contractor operating out of the Baltimore Field Office under the supervision of Rod Rosenstein was corroborated by an October 15, 2015, court motion to seal by Mr. Rosenstein wherein Mr. Rosenstein refers to Mr. White as in fact working for law enforcement on confidential, active cases, and seeking to seal certain records to avoid compromising Mr. White and placing his safety at risk.³

- Mr. White reported that he personally witnessed the successful illegal invasion by the "planting of access points" at my home; a fact that was corroborated by the Verizon drop-line tool found at our home and documented by photograph.

- Mr. White reported that Defendant Bridges was specifically instructed to "target Ms. Attkisson's husband" and to "get that bi_ch under control", and that these directives came directly from Mr. Rosenstein who had reportedly received them from General Holder. That piece of information was corroborated by the internal emails that showed General Holder's top aide telling Holder that I was "out of control" and to stop her.

³ <https://ecf.mdd.uscourts.gov/doc1/09317195983>.

- Mr. White’s information that security of the Attkisson operation was heightened due to the publicity generated by her “Fast and Furious” story was corroborated by the dozens of emails that became public years later that showed that both DOJ and ATF were discussing and concerned about the “Fast and Furious” reporting and that going on the offensive had to be done in a secure manner due to publicity.

- Mr. White’s information that much of the illegal work was done through the Criminal Division’s Computer Crime and Intellectual Property Section in Baltimore before it came “online,” was further corroborated by what the public learned about how the Obama Administration’s crackdown on insider whistleblowers and journalists received stepped-up National Security Division cyber efforts, holding specialized training at DOJ headquarters for the already existing National Security Cyber Specialists (NSCS) network and the Criminal Division’s Computer Crime and Intellectual Property Section (CCIPS).

- Mr. White reported that the FBI’s Mr. Shawn Henry was a computer expert, and that he and the people working with and for him, including Defendant Bridges, used software programs developed for the specific purpose of conducting illegal surveillance. Mr. Bridges’ testimony in this litigation confirmed that one of his responsibilities included, among other things, conducting forensic computer investigations.

- Mr. White reported that in or around 2012, an order came down to remove the government’s illegal software because Attkisson had “tied the FBI and White House” to the intrusion and was getting too close to the situation. This fact was corroborated insofar as timing because forensics identified that in late 2012, among other possible dates, remote intruders took steps to remove traces of the illegal software from our computers.

- Mr. White reported that some of the equipment used in the illegal surveillance was either purchased from pawn shops for cash or were laptops taken from the Secret Service in Maryland, used for the surveillance, and then either returned to be wiped and re-used by Defendant Bridges and others. This fact was corroborated by prosecutors’ records indicating that government property seized from Defendant Bridges during one of the searches included a MacBook laptop computer that Defendant Bridges had reportedly taken from the Secret Service.⁴

- And lastly, in this investigative journalist’s decades of experience, it is not at all surprising that the DOJ would rely on cooperating criminals or alleged criminals to conduct or assist in conducting activities for them, such as the surveillance of me and my family, especially when those activities – like gun-running – are illegal. Nor do I find it unusual that one convicted felon would call another convicted felon a liar. I have witnessed this behavior routinely in my profession. Who among the convicted criminals is telling the truth can only genuinely be determined by the Court by having the opportunity to hear what the truth is after full and open discovery of the government representatives involved and alleged to have been involved, cross-examination, and open discovery, a task I have been attempting for almost a decade.

⁴ <https://ecf.mdd.uscourts.gov/doc1/09317543712>.

- And lastly, it is worth noting that Mr. White has implicated himself in the wrongdoing at issue and I am aware of no previous public record of him falsely implicating himself in wrongdoing.

71. In summary, we know with certainty through multiple forensics exams that the government is responsible for violating our privacy in a most intrusive and chilling way. I and my legal team have made Herculean efforts to accomplish the nearly impossible task of being our own detectives and somehow obtaining evidence against specific federal agents and officials, without being able to access the information they — the accused parties— hold, that would produce their names and specific roles in the scheme.

72. To date, the federal government has entirely failed to address an important and obvious barrier to the my seeking the truth: that the very people alleged to be involved in the illegal conduct are the same ones who are denying access to evidence. The repeated delays, obfuscation, and the varied explanations for refusing to comply with my requests runs counter to the evidence before the court and is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.

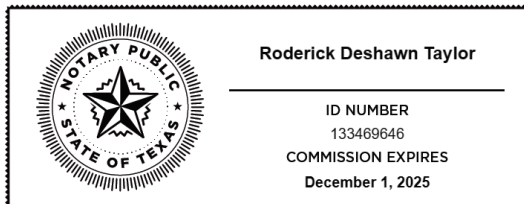
THE AFFIANT SAITH NOTHING FURTHER.

Respectfully submitted this 13th day of June, 2023.



SHARYL ATTKISSON

NOTARY PUBLIC:



Texas
Bexar

Notarized online using audio-video communication