

## Jacqueline Vizcarrondo

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**From:** Chad Mahalich  
**Sent:** Monday, June 28, 2021 3:51 PM  
**To:** Linda Fullerton  
**Subject:** RE: Discovery

Yes – I am aware – which is why he’s going to cut a quick email to alleviate the confusion.

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**From:** Linda Fullerton [REDACTED]  
**Sent:** Monday, June 28, 2021 3:18 PM  
**To:** Chad Mahalich [REDACTED]  
**Subject:** Re: Discovery

Items provided in the Mobile Extraction Report lists the extraction of the Cellebrite Report. Medal referenced the Cellebrite extraction That is what I am talking about

On Monday, June 28, 2021, 02:33:10 PM PDT, Chad Mahalich [REDACTED] wrote:

What are you talking about? An extraction from the Vera Institute? The Vera Institute doesn’t extract anything. Medal is writing an email to help clear this up...

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**From:** Linda Fullerton [REDACTED]  
**Sent:** Monday, June 28, 2021 2:11 PM  
**To:** Chad Mahalich [REDACTED]  
**Subject:** Re: Discovery

Chad:

None of this has been provided yet. I have checked thoroughly. The Vera Institue was provided and used by Medal. He used the following three things in his analysis:

- 1)The call detail records to Clark's phone [REDACTED]
- 2) Analyzed data from a forensic extraction of Clark's phone

These two are referenced in the PX transcript P99:25- 100:2

- 3)Sears information from the search warrant issued to Google account of Clark 114:12

This information is also referred to on Bates 776 as to what Medal relied on.

We have 1) and 3) We do not yet have the extraction from the Vera Institute that Medal used.

Medal would have this, I am sure if the download provided to Morris is missing.

Linda

On Monday, June 28, 2021, 08:59:49 AM PDT, Chad Mahalich [REDACTED] wrote:

Good Morning,

I will check with Amanda Sears again – but I believe that much of this information has either already been provided or does not exist.

As for #4 – please feel free to reach out to our administration about the Vera Institute – they hired them at a substantial cost (unknown), and they indicated that they would find bias in our charging – turns out they did not – which may explain why no report was actually written (or if it was, it has been hidden from the line deputies). In any event, you can do a PRA for it (if it exists).

Chad Mahalich

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**From:** Linda Fullerton [REDACTED]  
**Sent:** Saturday, June 26, 2021 4:10 PM  
**To:** Chad Mahalich [REDACTED] Chris Weir [REDACTED] Todd Bequette  
**Subject:** Discovery

Hello Chad:

There are various phone data records we still do not have.

1) Det. Nelly Morris issued a warrant signed on Oct. 25, 2018 that request among other things, the names and telephone numbers of stored contacts on Clark's phone, text messages, social media, emails, photographs etc. From this request, all we have received are text messages from June 30, 2018 @ 6:40:48 through July 1 @ 12:54:27. Please provide the rest of that download

2) Regarding the records that Analyst Medal has - I am assuming he is working from the records on disc 16. In Sears Statement of Probable Cause on the warrant signed Sept. 5th 2019 she comments that Medal, using new technology, was able to extract additional information from Clark's phone and that information has not been viewed by law enforcement. It is that further information that Medal extracted that we still need.

3) The results from the U.S. Secret Services lab report is not complete. We have the two pages. What we do not have is the electronic copies of the Cellebrite Report and the original and forensic copies of the image files. Those are listed under Items Provided on page two of the two page report. This information was given to Deputy Vu.

4) I understand that the Vera Institute produced a report for your office where they did a compilation and analyses of charging data from your office. I will need that for the Racial Justice Act motion that I am going to file.

Thank you, and let me know if you need any clarification on what I am requesting.

Linda