

From: [Chad Mahalich](#)
To: [Rachael Smith](#)
Subject: FW: Discovery: Medel Response to #2
Date: Tuesday, June 29, 2021 8:55:04 AM
Attachments: [image005.jpg](#)
[image006.jpg](#)

Can you please print this out for the discovery binder on Deanzer Clark et al?

Also – can you print this out and attach it to the back of Medel’s report for trial in the large binder as well?

Thanks,

Chad

From: Chad Mahalich
Sent: Tuesday, June 29, 2021 8:54 AM
To: Linda Fullerton (lindafullertonlaw@sbcglobal.net) <lindafullertonlaw@sbcglobal.net>; Todd Bequette <bequettelw@aol.com>; Chris Weir <chrisweir@aol.com>
Subject: FW: Discovery: Medel Response to #2

Good Morning,

Please find the response to your discovery request to #2 below.

I will be working to address #1 & #3, the tracker information request (although preliminarily, Amanda Sears was unable to locate any retained tracker information – but is confirming it was not saved). Finally, my senior managers will provide information for a response to #4.

Sincerely,

Chad Mahalich

From: Medel, Joshua
Sent: Monday, June 28, 2021 5:39 PM
To: Chad Mahalich <CMahalich@contracostada.org>
Cc: Amanda Sears
Subject: RE: Discovery

Hi Chad,

I provided all the evidence used in my analysis title “CCCSO 18-8351 - SSTF 19-01 Deanzer Clark CSA.pptx” and associated report. In regards to question 2. I used CDR_Mediations_5104171887_6586564.xls (CDRs w/ cell site information) and the forensic extraction report titled: “Samsung CDMA_SM-G925R4 Galaxy S6 Edge_2019-09-04_Report_2019-

10-21_Report.pdf.”

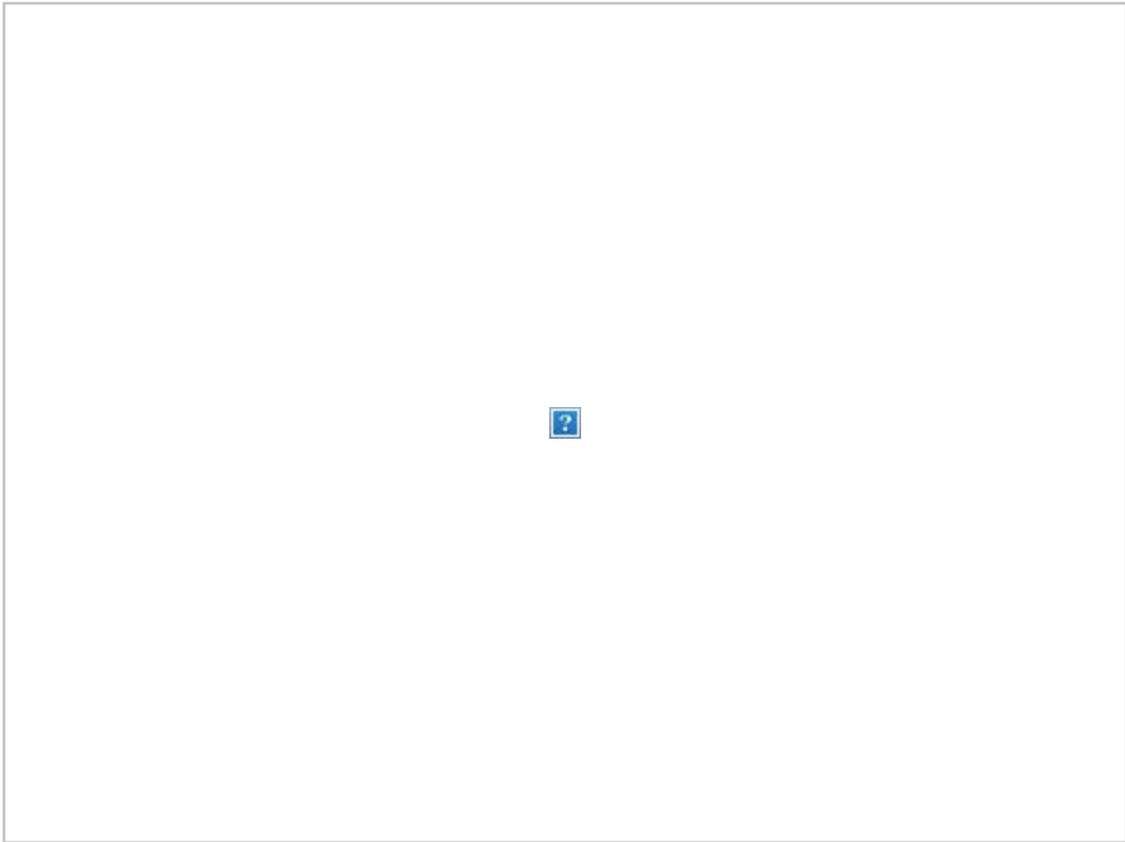
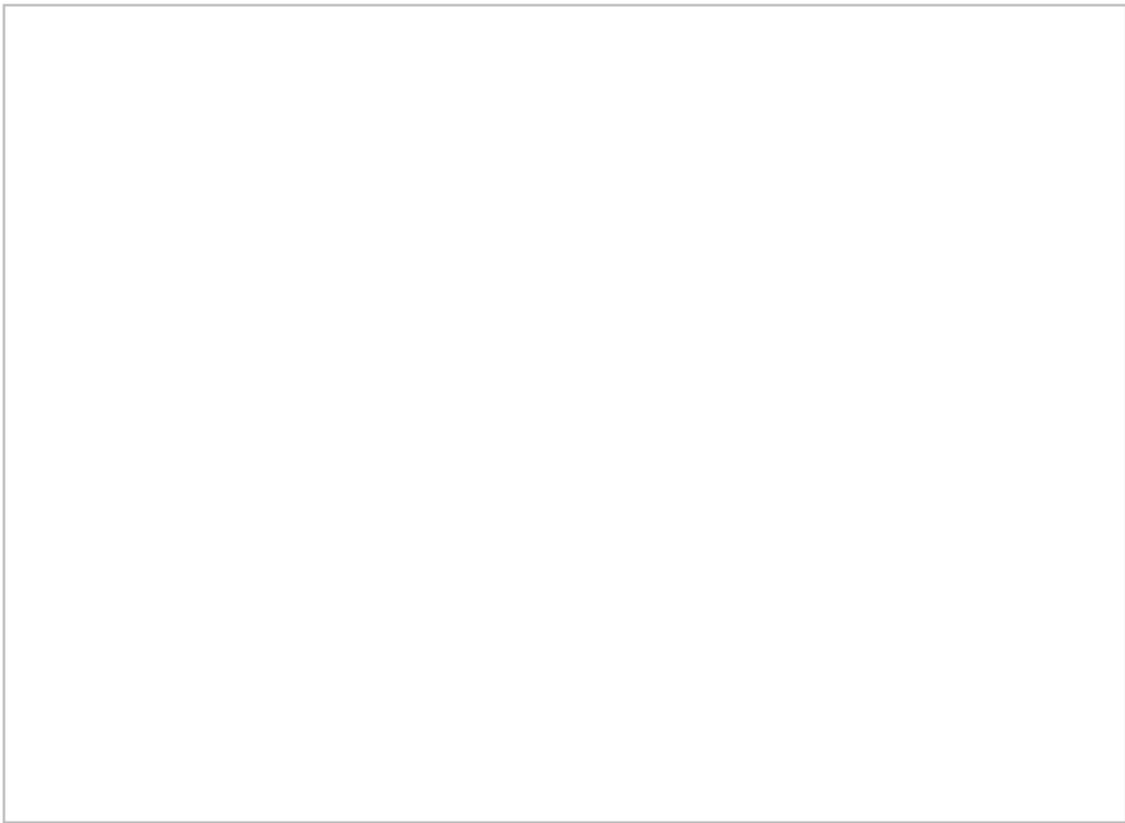
The “further information” mentioned in the email is from the forensic extraction report provided. In my analysis I depicted this as green sectors which were only two and are referenced in slide 7 and 10 of the power point provided.

The primary evidence in showing cellular site activity is from the CDRs received from the service provider. I included the cell site information obtained from the Cellebrite report to check my work.... I wanted to see if the cell site information from the service provider and the forensic extraction were consistent with each other... and they were. The tower information can be seen on the call out box where I reference the MCC, MNC, LAC, CID. CID provides identification to find where the tower is located and what sector is used. This information is found in the Cell Towers (p.3 row 11, 12) and Locations (p. 17 row 17, 18) portion of the Cellebrite report. Cellebrite also maintains a law enforcement database of tower information and provides the latitude and longitude where they identified the tower to be located. I converted the CID to LTE Site ID and found the corresponding cell site information from the CDRs in CDR_Mediations_5104171887_6586564.xls.

Lastly, I checked the FBI National Domestic Communications Assistance Center to ensure I did the conversion correctly. FBI NDCAC is a law enforcement support center organized under the Department of Justice. It provides technical knowledge and referrals in response to requests for assistance from any member of the law enforcement community. They also maintain tools and databases that are law enforcement sensitive // for official use only and only to be used for investigative means. I specifically checked the cell site database that the CID & LTE Site ID corresponded with the LTE Site ID referenced from the CDRs and Cellebrite report. They did.

The evidence in this analysis is the CDRs seized from the service provider and the Cellebrite extraction report. I have them labeled on my power slides.

Here are screen shots of slide 7 and 10.



From: Linda Fullerton <lindafullertonlaw@sbcglobal.net>

Sent: Saturday, June 26, 2021 4:10 PM

To: Chad Mahalich <CMahalich@contracostada.org>; Chris Weir <chrisweir@aol.com>; Todd Bequette <bequettelw@aol.com>

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