

January 17, 2018

Robert Hanlon & Associates
Robert Hanlon
14212 Washington Street
Woodstock, IL 60098

Mr. Hanlon,

I am providing you this statement in order to memorialize the events of tonight.

On January 17, 2018 at 5:09 pm Central Standard Time I received a call from Robert Hanlon counsel for Algonquin County Highway Department. Mr. Hanlon was informing me of a video taped conversation he had with Keith Seda of the I.T. Connection. The following assertions were made:

- Keith Seda works for I.T. Connection
- I.T. Connection performs IT Services for Algonquin Township
- That Mr. Seda was questioned in person regarding Garrett Discovery Inc's forensic report and Mr. Seda stated that he was instructed by Bob Miller former Algonquin Township Highway Commissioner to delete data from the IT systems

I asked Mr. Hanlon if the computer that Mr. Seda used to remotely wipe the hard drives had been preserved and whether or not there were any communications between Mr. Seda and Mr. Miller still present on Mr. Seda's devices. Mr. Hanlon asked that I perform a three-way call to Mr. Seda.

I called number 815.970.1384 and selected '1' for emergency / after hours and Seda answered the phone. Mr. Hanlon introduced himself and I to Mr. Seda.

I informed Mr. Seda that I wanted to gain facts and anything to corroborate what I had been told in a previous conversation I had with Mr. Hanlon.

Mr. Seda stated the following:

- That Mr. Miller asked him to wipe the data from the computers at the county because he had personal information on it
- That when he went to wipe data from Mr. Millers desktop PC that there wasn't anything to wipe because Mr. Miller had already deleted everything
- That he replaced the backup drives (containing backups) from the server and replaced them with two new drives
- That he gave the two drives removed from the server to Mr. Miller
- That he has invoices for the work he had done, but is unsure whether or not he invoiced or replaced the workstation hard drives in the maintenance and sign shop
- The he has a text message he had sent Mr. Miller with the passwords
- That he removed the user profiles from the server and rebuilt them as new profiles
- That he downloaded and ran CCleaner to wipe out data
- That he will forward to Mr. Hanlon and I any information he still has regarding these tasks he performed

I shared my email address with Mr. Seda to send information regarding this incident.

I declare under penalty and perjury under the laws of the State of Illinois that the information provided is true and correct

Respectfully,



Andy Garrett
eDiscovery / Computer Forensic Expert