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**BY EMAIL**

Ms. Heather Kelly  
First Assistant Attorney General  
1300 Broadway 10<sup>th</sup> Floor  
Denver CO 80203

RE: Dallas Schroeder's Response to Christopher Beall's letter 2/7/2022

Dear Heather,

In response to Mr. Beall's letter 2/10/22, please be advised that Mr. Schroeder will not provide the name of the attorney who is in possession of the second external hard drive, or the location of either external drive. The reasons are that (1) both external hard drives are subject to Mr. Schroeder's control and are not in any danger of loss; (2) he has a duty under state and federal statutes to preserve records of the 2020 election; and (3) because of the danger of seizure of equipment such as occurred in Mesa County, Mr. Schroeder will keep the information confidential.

I see that the secretary promulgated a new rule today prohibiting the imaging of voting systems hard drives. This is an admission that Mr. Schroeder's imaging of the Elbert County hard drives was permitted. (The new rule appears to be unlawful, because it prevents clerks from backing up their systems.)

Mr. Beall's assertion that the server image preserved by Mr. Schroeder is a component of the voting system is incorrect as a matter of fact and law. The image is evidence that must be preserved. Lawyers can be trusted to preserve evidence without undergoing a background check. The Logic Cube Forensic Falcon Neo device is not a "removable storage device." The device is not under Mr. Schroeder's control, and he cannot produce it. The secretary's demand for disclosure of Mr. Schroeder's private conversations is overbroad and exceeds her authority. Objections 1-15 in Mr. Schroeder's response to EO 2022-04 apply to all of the above.

I hope that the secretary will accept Mr. Schroeder's proposal 2/9/22 to resolve this situation without litigation.

Sincerely,  
JOHN CASE, P.C.

By 