

DISTRICT COURT, MESA COUNTY, STATE OF COLORADO  
CASE NUMBER 22CR 22CR937  
21st Judicial District, Office of the District Attorney / Agency Case #21-257

## AFFIDAVIT IN SUPPORT OF ARREST WARRANT

IN THE MATTER OF:

### Mesa County Elections Department

and in support of the Application for Arrest Warrant, Investigator James Cannon, presents the following Affidavit in support of an Arrest Warrant and asserts the following:

1. That I am of lawful age and a duly sworn law enforcement officer currently employed by the 21<sup>st</sup> Judicial District of Colorado, Office of the District Attorney and was so at all times relevant to the facts contained herein and may be referred to as AFFIANT. All of the information herein contained was compiled by me in the course of a criminal investigation, including reviewing official reports and documents, speaking with fellow law enforcement officers, and interviews with named citizens. All locations referred to are in the County of Mesa, State of Colorado, unless specifically noted otherwise.
2. Your AFFIANT has over 3000 hours of specialized law enforcement training and has conducted countless investigations, including but not limited to elections crimes, cell phones investigations, and computer investigations. AFFIANT has over 18 years of law enforcement experience.
3. The information contained in this affidavit was compiled by AFFIANT in the course of a criminal investigation by speaking to fellow law enforcement officers, citizen informants, personal observations, and reviewing official law enforcement reports. All locations referred to are in Mesa County, Colorado, unless specifically noted otherwise.
4. During this investigation, AFFIANT has had conversations with numerous subjects with vast technical election training and technical cyber/computer training, including federal government computer scientists and agents.
5. Forthcoming information is not all in the order of when it was obtained, but rather arranged chronologically for easier readability.
6. Involved parties and associations:

#### Mesa County Election Staff

Tina Peters	(dob 09/11/55) Mesa County Clerk and Recorder
Belinda Knisley	(dob 07/27/55) Mesa County Deputy Chief to Clerk Peters
Sandra Brown	(dob 07/12/77) Mesa County Elections Manager (back office)
Brandi Bantz	(dob 04/06/81) Mesa County Elections Director
Stephanie Wenholtz	(dob 01/08/81) Mesa County Elections Manager (front office)
Kelly Bryant	(dob 06/17/86) Mesa County Recording Manager

## Secretary of State Staff

Chris Beall	Deputy Secretary of State
Jesse Romero	Secretary of State Voting Systems Manager
Danny Casias	Secretary of State on-site Trusted Build Staff

## Dominion Voting Systems (Dominion) Staff

David Stahl	Dominion Customer Service Rep
Chris Estas	Dominion Team Lead for Trusted Builds.
Shawn McCrum	Dominion Trusted Build staff – Ballot marking Devices

## Others involved

Conan J Hayes	(dob 01/16/75)
Gerald Wood	(dob 04/11/66) local Software Engineer
Sherronna Bishop	(dob 08/18/80)
Dr. Douglas Frank	(dob 05/13/61)
Maurice Emmer	associate to FRANK, BISHOP, and LINDELL

## Mesa County Elections

7. The Mesa County Elections Office was supervised by Tina PETERS, who was elected to the Clerk and Recorder position in November 2019. The Elections office is located at 200 South Spruce Street, Grand Junction, Colorado, inside of a multi-purpose county building. Within the office – according to state investigators who have visited the office as well as based on interviews with Clerk’s Office employees – is a dedicated room known as the “Tabulation Room,” where specialized machines and electronics are securely stored and used to tally voter ballots during elections in Mesa County. The equipment in the Tabulation Room includes a server and eight computers connected to that server.
8. Voter ballots are scanned and tallied through a series of specialized, computerized voting machines (CVMs) in the Elections Department. Dominion, a Colorado-based election technology company, owns the CVM, but leases the equipment and related software to Mesa County. Periodic upgrades to the CVM are referred to as “Trusted Builds” which require the cooperation of Dominion, Mesa County, and the Colorado Secretary of State Office. Dominion personnel and Secretary of State officials have described the Trusted Build process. On the day of a Trusted Build representatives from each entity (County, SOS, and Dominion) come together in-person.
9. The Dominion-Mesa County agreement – in a list of prohibited acts – includes:  
Users **shall not “decipher or analyze the Software in whole or in part”**. The agreement also prohibits copying and distributing the software.
10. According to Mesa County information technology staff, the county building housing the Elections Office maintains video surveillance as well as access key card controls. Inside the building is an installed and designated video surveillance system for the Elections Office and Tabulation Room that is used for both routine security and to help ensure a fair, proper election process. Some critical camera angles are directed at the Tabulation Room and CVMs.
11. The county building including the Elections Office is equipped with electronic access controls

for exterior and interior doors. Authorized Mesa County employees can be granted access by the issuance of an access badge or card.

12. In April and May 2021 the Clerk and Recorder's Office had a relatively straightforward hierarchy:



\*Sandra BROWN's employment has since been terminated in part due to a legal Order, prohibiting BROWN from working in Mesa County Elections, based in part on allegations of BROWN's involvement in the elections security breach.

\*KNISLEY has since been placed on non-paid admin leave.

### PETERS's reaction to 2020 National Election Results

13. According to public reporting, in the months following the 2020 national election, Peters made a number of comments on her personal Twitter account ("@Bhealthynow") that have since been deleted. In response to a series of Tweets from a U.S. senator denouncing efforts to challenge the national Electoral College certification, PETERS stated in January 2021:

"Shame on you! As one that administers elections in my county, you apparently have no idea how it is possible to 1) tabulate more than once ballots favoring a candidate 2) change algorithm in a voting machine (see Eric Coomer from Dominion's Facebook ranks) UR Dirty or ignorant."

PETERS also stated that:

"[t]his was not an election. This was planned fraud on a grand scale. If you refuse to acknowledge that you WILL NOT be re-elected. We need others in your place that uphold the Constitution and preserve our Republic."

14. Beginning in or about April 2021, in e-mail traffic involving Mesa County, the Colorado Secretary of State commenced preparations for Trusted Build election software upgrades across Colorado, including in Mesa County. Mesa County's Trusted Build was scheduled to occur between May 25, 2021 and May 27, 2021. According to a video recorded interview conducted with BANTZ, PETERS had asked BANTZ to seek the Colorado Secretary of State's approval for community participants to be present for the Trusted Build.

On April 16, 2021, Jessi ROMERO, the voting systems manager for the Colorado Secretary of State, contacted Mesa County Director of Elections Brandi BANTZ by email. ROMERO stated that he was "follow[ing] up on your request to have members of the public onsite during the trusted build of your voting equipment." ROMERO explained that **"[o]nly required person[nel] from [Dominion], [the Secretary of State's Office], and the county will be permitted in the area of the trusted build."**

ROMERO also reminded Mesa County Elections staff, "The trusted build will **be installed under camera**, so for those members of the public that are interested in the process, my suggestion is to bring them in (after your install date) and allow them to watch the video."

It should be noted that election rules only require the camera to be turned on for a period before and after an election, however, there is no cost or detriment to the county to leave the cameras on full time.

### Meeting with Dr. Frank

15. On April 23, 2021, PETERS convened a meeting in her office. One meeting participant secretly audio recorded part of the meeting on audio from a cell phone and subsequently provided the recording to investigators. Those in attendance from the Clerk and Recorder's Office were PETERS, KNISLEY, BANTZ, WENHOLZ, and **BROWN**. Non-employees present for the meeting were Sherronna BISHOP (a local political activist and the former campaign manager of a now-member of the U.S. House of Representatives), Douglas G. FRANK (an Ohio-based high school mathematics teacher who travels across the country conducting presentations and creating YouTube videos asserting that the 2020 election was marred by fraud), and an individual named MAURICE (believed to be later identified as Maurice Emmer).
16. During the meeting (based on the partial recording), FRANK asserts that the county's election management system is vulnerable to outside interference and is likely accessible remotely. PETERS asked FRANK if FRANK can open the voting machines. FRANK responded that opening the machines is **"against the law because you signed a contract."** PETERS responded: "Ok, alright alright." BISHOP, the local activist, raised the issue of the Mesa County Trusted Build set for late May: "On May 26-27, when they come, what's the plan?" One of the employees responds: "The plan, as far as I know, they're updating the software." PETERS then asked FRANK: "I'm gonna step out on a limb, you wanna come May 26?" BISHOP explained to FRANK that "they're doing an audit here, they're gonna wipe the machines." FRANK responded, "I don't think I'm your guy to do that audit, but I know the team and they'll do it for you and they'll come in with the best in the country." PETERS then asked BANTZ to leave the room, "Brandi might have to leave while we talk about this. . . . Why don't you leave while we talk about this?" and subsequently PETERS asked WENHOLZ to depart as well, "Stephanie, you might need to walk out, too." **BROWN was not asked to leave in the recording.**
17. During 2021, PETERS was working on her ongoing attempt to change Mesa County voting software providers from Dominion to another company, Clear Ballot.
18. On 04-26-21, Secretary of State Voting Systems Manager ROMERO emailed PETERS and other clerks throughout the state, explaining that Dominion's Democracy Suite 5.13 voting system had been certified for use in Colorado. The state would be preparing for the voting system upgrades (that is, the Trusted Builds).
19. On 04-30-21, specific direction came from S.O.S. staff ROMERO via email:
  - A. About who is allowed in the room during the Trusted Build
  - B. And a reminder to Back-up any election projects on removable media.

**From:**  
[Jessi Romero](#)

**From:** Jessi Romero

**Cc:** [Judd Choate](#); [Hilary Rudy](#); [Danny Casias](#); [Edward Morgan](#); [Will Graham](#)

**Bcc:** [The long e-mail NAME list was shortened here by AFFIANT to reduce length of this Affidavit]

[tina.peters@mesacounty.us](mailto:tina.peters@mesacounty.us); [TMEisenman@parkco.us](mailto:TMEisenman@parkco.us); [tobe.wright@bentcountynet.net](mailto:tobe.wright@bentcountynet.net); [traschke@moffatcountynet.net](mailto:traschke@moffatcountynet.net); [treasa.ellis@rbc.us](mailto:treasa.ellis@rbc.us); [ymedina@larimer.org](mailto:ymedina@larimer.org)

**Subject:** Trusted Build information

**Date:** Friday, April 30, 2021 1:02:52 PM

**Attachments:** [image001.png](#)

Dominion Voting Systems - Background Check Confirmation Letter - April 2021.pdf Voting Systems team  
- Background checks - 2021.pdf  
COVID-19 Trusted Build Procedures 4.30.21.pdf

Good afternoon,

In advance of the upgrade to your voting system, I'm reaching out to provide guidance on how to prepare for our visit, and what procedures we all will be required to follow when we are onsite for your Trusted Build.

### **COVID-19**

CDOS staff has been fully vaccinated.

Please find the attached document titled "COVID-19 Trusted Build Procedures\_4.30.21" for a list of requirements that we all must follow.

I would like to bring a few requirements from this document to your immediate attention: "The number of Dominion and county staff will be limited based on the size of the room and the minimal amount of people required to complete the process in a safe and efficient manner."

"The Voting Systems Manager will advise the county and vendor of the maximum number of staff from each that may be present during the process."

Adams, Arapahoe, Boulder, Denver, El Paso, Jefferson, Larimer, Weld:

Staff will be limited to 4 CDOS, 8 Dominion & 8 county staffers.

All other counties:

Staff will be limited to 1 CDOS, 2 Dominion & 2 county staffers.

"No later than **one week** before the scheduled appointment, the county and Dominion must each confirm in writing (by email) the staff who will be present, and that they will adhere to these procedures during the trusted build installation. The Voting Systems Manager will not finalize a visit until confirmation is received."

1. Please send me an email at any time up to one week before your scheduled Trusted Build stating that you will comply with the requirements listed in the document, **and identifying the county staff members (by name and position)** who will be involved in the Trusted Build.
2. I will confirm by email that I have received your list of staff and that you will comply with the requirements.
3. CDOS staff assigned to your Trusted Build will send you an email before your visit to confirm who will be onsite and other details.

**"Only authorized state staff, county election staff and Dominion staff may be present during trusted build."**

The onsite installation of the Trusted Build is not the time for members of the public, representatives from the local parties, or county officials other than the Clerk & Recorder to observe or ask questions about the process or any of the disinformation being pushed about the election.

If, when we arrive onsite, or during the process there are others present (beyond Dominion and county election staff that have been authorized, and the Clerk & Recorder) in the area where the Trusted Build will take place, we will move on to the next county. It will then be the responsibility of the Clerk and Recorder to ship equipment to Denver so it may be upgraded at a time that works for Dominion and CDOS. Once the equipment is upgraded, it will then also be your responsibility to ship the equipment back to your county.

We are happy to communicate with anyone who has questions or concerns about the process at any time before or after your Trusted Build date.

### **Preparation & notes**

**Backup any election projects on your voting system to removeable media before our arrival.** Please have all equipment set up per the COVID-19 guidance before our arrival. For those who do not have the space to set up your entire inventory at one time, please have a plan to seal (if necessary) and swap equipment out.

Remove the bezels from your Samsung ICXs, should you have them. You do not need to open the base of the ICX.

QuickHash, Libre Office, and the Aegis drive software will be installed on your EMS client or express server.

#### **Background checks**

Background checks for DVS and CDOS staff are attached to this email.

We look forward to seeing everyone again! It has been far too long. Please let me know if you have any questions.

#### **Jessi Romero**

Voting Systems Manager | Department of State 303.894.2200 ex. 6348

[Jessi.Romero@sos.state.co.us](mailto:Jessi.Romero@sos.state.co.us)

1700 Broadway, Suite 550  
Denver, CO 80290

20. The process of backing up “election projects” consists of logging into Microsoft Windows, launching the voting software, navigating through menus to create a file package back-up, and then copying the file project to removable media, such as a thumb drive. This is the routine method used all over Colorado by election staff. **Imaging of a hard drive is NOT involved in backing up election records.**

#### **Gerald “Jerry” Wood’s employment misrepresented to county employees**

21. On 05-13-21, KNISLEY e-mailed Human Resources about a “Temp Employee” needing security badge access and a Mesa County e-mail address.
22. The following day, on 05-14-21, Information Technology staff David Underwood contacted KNISLEY via e-mails: KNISLEY, “This is not a new hire. This is a temp person for the Elections Department and per Clerk Peters and Dave, send an email to Help Desk, copy Lhana and it would be issued.”
23. Cellular records show that on 05-14-21, at about 0900 hours, there was about a 6 minute call from PETERS’s phone to WOOD’s phone. That same day, 05-14-21, KNISLEY requested badge access for WOOD to be the same as BROWN’s access. In reading the e-mail, MOORE was clearly under the impression WOOD was **not a county employee.**
24. WOOD was issued a badge (key card). AFFIANT obtained a copy of the HR image used to imprint the badge. AFFIANT has viewed Colorado Driver’s license images and AFFIANT is confident that this person is Gerald Ross WOOD (dob 04/11/66).

#### **Cameras are turned off**

25. On 05-17-21, **just 1 month after SOS ROMERO indicated that the Trusted Build will be under video camera recording, and 4 days after the process was started to obtain County credentials for Gerald WOOD**, KNISLEY started the process to turn the cameras off. Interviews with I.T. staff confirmed there is no financial benefit to have the cameras turned off. Data storage costs, for example, are not impacted by disabling the camera. I.T. Andrew WETZEL, who is the person responsible for making sure the election cameras are in good working order and recording every election, **reported he does not recall any time in the past years when the cameras were ever turned off.**
26. Investigator STRUWE reviewed the last video footage from 05-17-21 and PETERS and BROWN are in the footage and were observed showing an interest in visually locating the cameras with an obvious interest in visually locating the cameras in the Tabulation Room and

BROWN appeared to be taking photos of the room and a photo while directly facing the camera. In the footage, at about 0819 hours, TINA PETERS and SANDRA BROWN could be seen having a conversation. PETERS stands and walks around while SANDRA sits at her desk. At numerous times during this conversation, PETERS apparently glances up at various corners of the ceiling in the room. At one point, she looks directly at the operational camera; see screenshot below:



Moments later, PETERS appears to also look up at the other camera that was in the room (not operational). Screenshots showing PETERS looking up at the camera, compared to her "normal" head posture are included below:



A short time after PETERS leaves the tabulation room, BROWN uses what appears to be her cell phone to take photos of the ballot sorting room, as well as the tabulation room, including a photo while directly facing the camera; see below screenshots:



27. WENHOLZ was supposed to be involved in the upcoming May 25, 2021 Trusted Build. WENHOLZ was informed she was being removed from the build on 05-17-21, the same day KNISLEY gave her a CBI background check to complete for a "Gerald Wood." **WENHOLZ has done about 175 to 200 background checks and she always met the applicant in person for the CBI check. WENHOLZ never met Gerald WOOD and WENHOLZ never saw any HR paperwork for WOOD.** WENHOLZ was told WOOD was a new "Admin Assistant." WENHOLZ therefore assumed WOOD was replacing Tiffany Sealey, the prior Admin Assistant, although she was unaware if that position had been posted. According to WENHOLZ, the manner in which she was requested to perform WOOD's background check was entirely different from all other checks she performed in her position.

## Gerald “Jerry” Wood’s employment misrepresented to SOS Romero

28. During correspondence between SOS ROMERO and county elections staff on 05-18-21, Gerald WOOD was presented as a county employee, specifically an **“Admin Assistant”**.  
**In Trusted Build Confirmation e-mail from Sandra BROWN to ROMERO and KNISLEY:**

From: Sandra Brown <sandra.brown@mesacounty.us>  
 Sent: Tuesday, May 18, 2021 3:16 PM  
 To: Jessi Romero <jessi.romero@SOS.STATE.CO.US>  
 Cc: Belinda Knisley <belinda.knisley@mesacounty.us>  
 Subject: [EXTERNAL] Dominion Upgrade - Mesa County

Jessi,

I am writing to confirm that Mesa County will adhere to the procedures outlined in your previous email during the trusted build installation.

The Mesa County staff that will be present is:

Myself, Sandra Brown - Elections Manager Back Office  
 Gerald Wood - Administrative Assistant  
 Tina Peters - Mesa County Clerk & Recorder


Please let me know if you need anything else.

Have a great afternoon!

Kind regards,

*Sandye Brown*

It should be noted at that time the Admin Assistant position was vacant and **there was no job posting, as required** until the position was later posted on 06-04-21.

 <b>MESA COUNTY</b> invites applications for the position of:	
<b>Administrative Assistant – Clerk &amp; Recorder</b>	
<b>SALARY:</b>	\$17.09 - \$19.65 Hourly
<b>OPENING DATE:</b>	06/04/21
<b>CLOSING DATE:</b>	Continuous

Colorado SB19-085 is an act that requires an employer to announce to all employees employment advancement opportunities and job openings and the pay range for the openings.

29. On 05-19-21, at about 1300 hours, KNISLEY’s county cell phone data shows that KNISLEY sent a text message to WOOD’s known number.

5/19/2021 1:04:25 PM(UTC-6) From: +19708126249 Belinda Knisley  
 To: +17199300265

Hi Jerry, this is Belinda Knisley, come to Motor Vehicle window and ask for me please. I'll let them know to expect you

At this meeting between KNISLEY and WOOD, KNISLEY took WOOD's keycard badge. After this meeting, WOOD never returned to do any work for Elections Department.

Later in the investigation(March 2022), AFFIANT learned that back on 05-20-21, at 0900 hours, **less than 24 hours after KNISLEY summoned WOOD to her office, Sherronna BISHOP’s credit card was used to make hotel reservations in Grand Junction for “James Hayes” for May 22<sup>nd</sup> to May 26th.**



Hampton Inn Grand Junction Downtown/Historic Main Street		Reservation History	
James Hayes	Hotels.com	United States Of America	831.40 USD
May 22, 2021—May 26, 2021 (4 nights)		Booking Date May 20, 2021 9:00 AM MDT Confirmation Date May 20, 2021 9:00 AM MDT Reconfirmed Date Jun 15, 2021 5:18 AM MDT Invoiced Date Jun 5, 2021 Last Modification Date May 20, 2021 9:00 AM MDT	
Room Type Room, 1 King Bed, Accessible, Non Smoking	Hotel Collects Payment Payment Information Sheroyne bishop Expires 3/2022 Cvv Billing address ***** ***** 9485 ***** ***** USA		

In 2022, AFFIANT obtained an audio recording confirming a person headed to this hotel provided his name as “Conan Hayes”.

### Conan Hayes California Flight

30. In April 2022, AFFIANT obtained cellphone records for a known phone number belonging to Conan Hayes as (310) 560-1949 at T-Mobile. Cell Tower Records show CONAN Hayes’s cell phone in the area of the Burbank, **California** airport on 05-22-21. Shortly after, CONAN’s cell phone was using a tower in **Mesa County, Colorado**.



Flight records confirm that CONAN flew into Grand Junction.

### Image #1

31. The audit trail of Mesa County key card access shows that on the Sunday (05-23-21) just before the week of the scheduled Trusted Build, the 3 access cards issued to PETERS, “WOOD”, and **BROWN** were used in the Elections area at various times and late into the evening:

5/23/2021 8:07:54 PM	Peters, Tina	Access Granted	Central Elections to Tabulation Exit
5/23/2021 8:11:15 PM	Peters, Tina	Access Granted	Central DMV
5/23/2021 8:11:46 PM	Peters, Tina	Access Granted	Central Public Records
5/23/2021 8:13:26 PM	Peters, Tina	Access Granted	Central Elections
5/23/2021 8:17:50 PM	Peters, Tina	Access Granted	Central Northwest Entry
5/23/2021 8:18:09 PM	Peters, Tina	Access Granted	Central Corridor 33
5/23/2021 8:18:25 PM	Peters, Tina	Access Granted	Central Multi Purpose Room 2
5/23/2021 8:21:26 PM	Peters, Tina	Access Granted	Central Elections to Tabulation Exit
Group Count: 40			
40857 (68)			
5/23/2021 10:53:02 AM	Brown, Sandra	Access Granted	Central Northwest Entry
5/23/2021 10:53:42 AM	Brown, Sandra	Access Granted	Central Corridor 33
5/23/2021 10:53:55 AM	Brown, Sandra	Access Granted	Central Elections
5/23/2021 10:54:04 AM	Brown, Sandra	Access Granted	Central Elections to Tabulation
5/23/2021 11:17:49 AM	Brown, Sandra	Access Granted	Central Elections to Tabulation Exit
5/23/2021 12:03:58 PM	Brown, Sandra	Access Granted	Central Northwest Entry
Page 1 of 2 on 6/14/2021 12:37:50 PM			
Card # (F/C)	Cardholder	Event Description	Event Location
Event Date			
5/23/2021 12:04:19 PM	Brown, Sandra	Access Granted	Central Corridor 33
5/23/2021 12:04:26 PM	Brown, Sandra	Access Granted	Central Elections
5/23/2021 3:01:36 PM	Brown, Sandra	Access Granted	Central Northwest Entry
5/23/2021 3:03:16 PM	Brown, Sandra	Access Granted	Central Corridor 33
5/23/2021 3:03:24 PM	Brown, Sandra	Access Granted	Central Elections
Group Count: 11			
44697 (68)			
5/23/2021 3:53:27 PM	Wood, Gerald	Access Granted	Central Corridor 33
5/23/2021 3:53:37 PM	Wood, Gerald	Access Granted	Central Elections
5/23/2021 3:55:10 PM	Wood, Gerald	Access Granted	Central Corridor 33
5/23/2021 3:55:18 PM	Wood, Gerald	Access Granted	Central Elections
5/23/2021 6:50:07 PM	Wood, Gerald	Access Granted	Central Corridor 33
5/23/2021 6:50:17 PM	Wood, Gerald	Access Granted	Central Elections
Group Count: 6			

It was later determined that someone unlawfully took a digital image of the entire Dominion hard drive on this date (05-23-21) for the specific purpose of analyzing the software and data. PETERS later publicly admitted to this act and this motive.

The first EMS Server disk image was acquired at Sun May 23 22:30:36 2021. (Inferring that this time is UTC, that would be 4:30 PM Mountain Time).

The hard drive image contains the Dominion copyrighted software and the image is now

available to the general public on the world-wide internet where subjects have uploaded it to. National platform media outlets and computer experts suggest that nefarious hackers may study the software files to attempt to find vulnerabilities to harm future elections.

### The Trusted Build

32. The Trusted Build was completed on 05-25-21 and 05-26-21 with PETERS, Dominion staffers David STAHL and Shawn McCRUM, SOS employee Danny CASIAS(a public servant), a person going by the name "Gerald Wood", and **Sandra BROWN**.

### "Gerald 'Jerry' Wood's" employment misrepresented to SOS CASIAS, SOS Jesse ROMERO, Dominion, and County Staff

33. About 1 week before the Trusted Build, BROWN misrepresented WOOD's employment capacity in an e-mail from BROWN to ROMERO; "Gerald Wood - Administrative Assistant"
34. STAHL recalled that "WOOD" was introduced to STAHL as an "Administrative Assistant" who would be cross-training in all aspects from Motor Vehicle, to Recording, to Elections and they wanted WOOD to be a part of the build, WOOD was new to the office and they wanted to get him involved in the elections process; STAHL was pretty sure PETERS was the person who introduced WOOD and presented WOOD as having this role.
35. CASIAS reported that PETERS introduced "WOOD" to CASIAS and PETERS presented WOOD as an "employee of the Motor Vehicle Division and transferring over **to Elections to report to SANDRA [Brown]**" and that WOOD was present there to learn. **BROWN was close by when this introduction happened, but she did not interject if that was true or not regarding WOOD's employment position(s).**
36. Clerk staff Becky WHITE reported that on 05-25-21, she was in the hallway coming from the breakroom back toward the Elections office when she ran into TINA and a male who was with her. She said it was in the morning, the morning of the build, and it looked to her like TINA and the male were waiting for the Dominion employees and SOS employees to start the build. BECKY said TINA asked her, "Have you met my assistant?" She said TINA introduced the male with her as "Jerry," her assistant. BECKY said she and "Jerry" shook hands.
37. It should be noted that it is clearly posted in the secure elections area, that recording devices are not allowed:



It should also be noted that had the Mesa County security cameras in the Tabulation room been recording, investigators, and the public in general, would have been able to request footage to monitor the activities of the trusted build. The security cameras were not designed to capture sensitive information from the screens of the computers, such as passwords, but would have provided an overview of who was there, when they were there, and what actions they took.

AFFIANT has obtained the last footage before the camera was shut off in May 2021.



During the build WENHOLZ asked to meet “WOOD”, but WENHOLZ believes she was told by Sandra BROWN and PETERS that WOOD’s employment was “not going to work out”. Neither WENHOLZ nor BANTZ ever saw WOODS work in the elections department.

### Image #2

38. The audit trail of Mesa County key card access shows that on the evening of 05-26-21, after the Trusted Build, the 2 access cards issued to PETERS and BROWN were used in the Elections area at various times past normal business hours:

5/26/2021 5:39:28 PM	Brown, Sandra	Access Granted	Central Elections to Tabulation
5/26/2021 5:56:25 PM	Brown, Sandra	Access Granted	Central Multi Purpose Room 2
5/26/2021 6:28:41 PM	Brown, Sandra	Access Granted	Central Elections to Tabulation Exit
5/26/2021 6:30:51 PM	Brown, Sandra	Access Granted	Central Elections to Tabulation
5/26/2021 6:59:28 PM	Brown, Sandra	Access Granted	Central Elections to Tabulation Exit
5/26/2021 5:53:36 PM	Peters, Tina	Access Granted	Central Elections
5/26/2021 5:53:42 PM	Peters, Tina	Access Granted	Central Elections to Tabulation
5/26/2021 6:35:05 PM	Peters, Tina	Access Granted	Central Multi Purpose Room 2 Exit
5/26/2021 6:35:55 PM	Peters, Tina	Access Granted	Central Multi Purpose Room 2
5/26/2021 6:35:59 PM	Peters, Tina	Access Granted	Central Multi Purpose Room 2

It was later determined that someone unlawfully took a 2<sup>nd</sup> digital image of the Dominion hard drive on this date for purposes of analyzing the software and data.

The second EMS Server disk image was acquired at Wed May 26 23:43:17 2021. (Inferring that's UTC, that would be 5:43 PM Mountain Time).

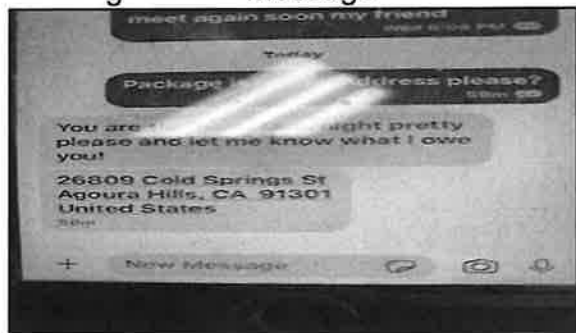
39. Cell phone data and flight records show HAYES left Mesa County prior to the 2<sup>nd</sup> Image being completed.

40. AFFIANT located a Mesa County finance transaction for a shipment from “Tina Peters” in Grand Junction to “Conan Hayes” in California, on 05/27/21. Mesa County Elections employee Kelly Bryant was the shipper.



41. Kelly Bryant was later interviewed and stated that Tina PETERS was on the phone with someone (who apparently then text messaged an address to Tina’s cell phone). Bryant

reported that **Sandra BROWN** handed Bryant an item wrapped in plastic wrap and PETERS told Bryant to ship the item. Bryant took a digital image of PETERS's cell phone, showing the text message on PETERS's phone screen:



42. A Packet Capture is data from computer network activity. Both FBI and Mesa County Information Technology staff have analyzed a Packet Capture from Mesa County Network and determined that someone used software, such as "Bit Shark" or "Wireshark" to capture data and internet traffic from the Mesa County Computer Network and **Sandra BROWN's Mesa County computer log-in credentials were used during the process on 05-23-21**. County employee log-ins and employee passwords are required to access the non-public network and WiFi routers.

Part of a 90 day repeating, Mesa County computer user login routine includes requiring the county staff to complete a digital Mesa County Computer User Agreement under policy 6.23. The user must affirm the following during the login:

- A. I will not share my password with others and I acknowledge I will be held responsible for all activity on my account.
- B. I will not circumvent data protection schemes or uncover security loopholes.
- C. I will not violate terms of applicable software licensing agreements or copyright laws

43. Around February 2022, AFFIANT learned through additional investigation that Gerald WOOD was indeed involved in communication regarding WOOD going through certain processes in order for WOOD to perform computer related services for Tina PETERS. However, affiant determined that Wood did not complete the services for Elections and the defendants used WOOD's identity for another person who was not WOOD. While Peters was using Wood's identity, additional crimes were committed/completed.

44. AFFIANT finds probable cause that the keycards assigned to PETERS, WOODS, and BROWN were in the Elections Office on the days the CVM was imaged **and that BROWN assisted and conspired with their overall scheme and crime(s)**. BROWN conspired to misrepresent the role and identity of the person (CONAN Hayes) who they intended to use (and did use) to copy the hard drive by using the identity of Gerald WOOD. BROWN's actions, statements, and/or inactions were a (successful) attempt to influence the public servant's decisions and actions before and during the Trusted Build through SANDRA's misrepresentations.

45. WOOD is no longer a target of the investigation. The person who completed that computer service using WOOD's identity is still under investigation.

46. The defendant is identified as:  
**SANDRA M BROWN**                      **DOB 07/12/77**



WF / 5'5" / 215# / Bln / Blue

47. On March 8<sup>th</sup> 2022, PETERS and KNISLEY were indicted by the Mesa County Grand Jury for numerous criminal charges regarding their actions taken around the 2021 Trusted Build. A District Court Judge later reviewed the indictment and found probable cause of the indicted offenses in both cases; 22CR371 and 22CR372.

48. In June 2022, KNISLEY agreed to a proffer interview with Investigators and AFFIANT. KNISLEY explained that PETERS told her to lie to HR regarding Gerald WOOD. KNISLEY explained that PETERS told her someone was else was coming in on May 23, 2021 instead of WOOD. This person was a consultant PETERS intended to use in order to back up a computer, so they could see if anything was erased by the Trusted Build process. **BROWN would have had to schedule her time to attend this.**

KNISLEY confirmed that Gerald WOOD was NOT an employee.

KNISLEY stated that **PETERS confided in KNISLEY that they needed to protect the identity of the person who was actually coming in, instead of Gerald WOOD, and this was the reason for turning off the cameras.** KNISLEY later learned that person's name is CONAN.

KNISLEY stated that on May 19, 2021 when KNISLEY took WOOD's keycard badge, that is the 1st day she knew WOOD was NOT going to be the person in the build.

KNISLEY never notified the SOS office after she found out about the mystery consultant (CONAN Hayes). KNISLEY doesn't think she informed SANDRA of this either, but KNISLEY knew SANDRA was going to be in the room during the build. **KNISLEY confirmed that BROWN would have known that WOOD was NOT actually an employee, that BROWN knew she did NOT have an administrative assistant, and that WOOD did NOT work at the Clerk and Recorder's Office.**

KNISLEY confirmed that KNISLEY directed BROWN to correspond with SOS about WOOD's role, **despite BROWN knowing that WOOD was not actually acting as an admin assistant. BROWN completed this task for KNISLEY.**

KNISLEY reported that they had to get a device to take the hard drive images, leaving it running because CONAN had to leave, **so BROWN had to finish making the image;** both PETERS and BROWN told KNISLEY this.

KNISLEY conceded that the keycard badge, "admin assist", using Gerald WOOD's identity, and the cameras being turned off was all part of the plan, "that was [their] goal to hide it from SOS" regarding who was actually in the room of trusted build.

49. The Victims are identified as:

State of Colorado (Society), Mesa County (Society), Danny Casias (SOS staff),

Jesse Romero (SOS staff), David Underwood (Mesa County Staff)  
James Cannon (DA Investigator)

50. And AFFIANT alleges and finds probable cause that between 04-01-21 and 05-28-21, the following crimes were committed by **SANDRA BROWN**:

Conspiracy to Commit Criminal Impersonation, as defined by CRS 18-5-113 and 18-2-201 (F6)

and

Attempt to Influence a Public Servant, as defined by CRS 18-8-306 (F4)

7/11/2022 | 13:18 MDT

\_\_\_\_\_  
Date

DocuSigned by:

*James Cannon*

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\_\_\_\_\_  
Investigator James Cannon  
District Attorney's Office

**STATE OF COLORADO**

)

) ss.

)

**County of Mesa**

The foregoing Attachment was signed and then sent to me electronically on

7/11/2022 | 13:05 PDT

\_\_\_\_\_, by Investigator James Cannon. After I reviewed it, I called Investigator Cannon and he telephonically swore to the truth of the information contained in this affidavit.

DocuSigned by:

*Matthew D. Barrett*

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\_\_\_\_\_  
Judge

DISTRICT COURT, MESA COUNTY, STATE OF COLORADO

CASE NUMBER \_\_\_\_\_

21st Judicial District, Office of the District Attorney / Agency Case #21-257

## ARREST WARRANT

THE PEOPLE OF THE STATE OF COLORADO,

TO: **ANY PEACE OFFICER IN THE STATE OF COLORADO, INTO WHOSE HANDS THIS WARRANT SHALL COME, GREETINGS:**

WHEREAS, this Court is satisfied that the Mesa County Grand Jury has found there is probable cause to believe that the person named in the indictment has committed the offenses of:

- 1. CONSPIRACY TO COMMIT CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) AND 18-2-201 (F6)**
- 2. ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

YOU ARE THEREFORE COMMANDED TO ARREST

**SANDRA M BROWN**

**DOB 07-12-77**



**White Female / 5'5" / 215# / Bln / Blue**

and bring them without unnecessary delay before the nearest available Judge of the County or District Court.

It is therefore order that bond be set in the amount of \$15,000 cash only

Date 7/11/2022 | 13:05 PDT

BY THE COURT Or: Signed by:

*Matthew D. Barrett*

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JUDGE or Magistrate

### Return of Service

I certify I arrested this person on \_\_\_\_\_ at \_\_\_\_\_

Date / Time

\_\_\_\_\_, \_\_\_\_\_ County, State of \_\_\_\_\_

Location

County Name

State Name

\_\_\_\_\_  
Officer