

1 Q And that's very, very important, correct?

2 A Yes, it is.

3 Q Because you want to maintain the integrity of the
4 electronic evidence?

5 A Yes, I do.

6 Q I'd like to take you to -- this is page 84 of
7 Exhibit 521. And I'd like to begin with JPEG on top here,
8 224.

9 (Exhibit published.)

10 BY MR. der OHANNESIAN:

11 Q First of all, I want to make sure you can read that.

12 A I can see it.

13 Q You say that this image was created on March 9th, 2006?

14 A That's the created date that's --

15 Q Yes?

16 A That's the created date that's listed for the file.

17 Q It was modified on March 9, 2006?

18 A That's the modified date that's reflected from the file
19 system.

20 Q And then it was accessed, correct, on a certain date?

21 A Yes, I see it's been accessed.

22 Q It was accessed on September 19, 2018, correct?

23 A Correct.

24 Q Look at exhibit -- the same exhibit, Image 225.

25 The next item reflects what might be called "carved

1 data"?

2 A Yes.

3 Q Okay. It doesn't mean the image doesn't exist on the
4 computer, though, correct?

5 A Well, if you're talking about the EXIF HTML, is that what
6 you're referencing?

7 Q No. Well, for example, right below it you see Image 225?

8 A Yes.

9 Q Let's continue. Image 225 created in March 9, 2006,
10 correct?

11 A Correct.

12 Q Modified in 2006 and it was accessed on September 19,
13 2018, correct?

14 A Correct.

15 Q And that's according to what you're reading off this
16 Exhibit 524, correct?

17 A Correct.

18 Q And Image 227, that was also accessed on September 19,
19 2018, correct?

20 A Correct.

21 Q Exhibit [sic] 228 was accessed on September 19, 2018?

22 A Which number again, excuse me?

23 Q 228.

24 A Yes.

25 Q Image 229, that was also accessed on September 19, 2018,

1 correct?

2 A Correct.

3 Q Image 230 was accessed on September 19, 2018, correct?

4 A Correct.

5 Q Image 231, JPEG, accessed on September 19, 2018? Is that
6 what the access date is?

7 A Is that a question or --

8 Q Yes. My question is: Does your report, in Exhibit 521-A
9 of the Government, reflect that JPEG Image 231 was accessed on
10 September 19, 2008 [sic]?

11 A Correct.

12 Q Does your report reflect that Image 233 was accessed on
13 September 19, 2018?

14 A Correct.

15 THE COURT: Could you repeat that?

16 MR. der OHANNESIAN: Yes.

17 BY MR. der OHANNESIAN:

18 Q Does your report reflect that JPEG Image 233 was accessed
19 by September 19 -- on September 19, 2018?

20 A Correct.

21 Q Image 234, JPEG, accessed on September 19, 2018?

22 A Correct.

23 Q Image 235 accessed on September 19, 2018?

24 A Correct.

25 Q Image 236 accessed on September 9, 2018?

1 A Correct.

2 Q Image 237, on page 89 continuing into page 90, accessed
3 on September 9, 2018?

4 A Correct.

5 Q Image 238 accessed on September 19, 2018?

6 A Correct.

7 Q JPEG 241 accessed on September 19, 2018?

8 A Correct.

9 Q There is no entry for JPEG 242 in the report.

10 On JPEG 243, that was accessed on September 19,
11 2018?

12 THE COURT: He can't see it.

13 MR. der OHANNESIAN: I'm sorry.

14 THE WITNESS: Yes.

15 (Exhibit published.)

16 BY MR. der OHANNESIAN:

17 Q Is that correct?

18 A Correct.

19 Q The metadata for JPEGs 224, 225, 227 to 241, and 243 from
20 Government Exhibit 524, the media card, changed after it was
21 collected on March 27, 2018, correct?

22 A The access dates appear to be.

23 Q The metadata for Exhibit 524, the media card, reflects
24 that the digital evidence on Exhibit 524 changed while it was
25 in the possession of the FBI, correct?