

David Greene (SBN 160107)
Victoria Noble (SBN 337290)
Electronic Frontier Foundation
815 Eddy Street
San Francisco, CA 94109
Tel.: (415) 436-9333
Fax: (415) 436-9993
Email: davidg@eff.org
tori@eff.org

Attorneys for Jack Poulson

ELECTRONICALLY
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Superior Court of California,
County of San Francisco
11/13/2024
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

JOHN DOE, an individual,

Plaintiff,

v.

SUBSTACK, INC., a Delaware
Corporation; AMAZON WEB
SERVICES, INC., a Delaware
Corporation; JACK POULSON, an
individual; TECH INQUIRY, INC., a
Delaware corporation;
DOES 1-25, inclusive,

Defendants.

Case No.: CGC-24-618681

**DECLARATION OF JACK POULSON IN
SUPPORT OF DEFENDANTS JACK
POULSON'S AND TECH INQUIRY'S
OPPOSITION TO PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER**

DATE: November 13, 2024

TIME: 11:00 a.m.

DEPT: 302

Judge: Richard B. Ulmer, Jr.

Action Filed: October 3, 2024

Trial Date:

DECLARATION OF JACK POULSON

I, JACK POULSON, declare as follows:

1. I am an independent journalist focused on the intersection of technology and national security. I currently write primarily through my newsletter published through Substack. I began the newsletter in April 2023. The newsletter currently has more than 2,900 subscribers. I publish approximately once per week. The newsletter can

1 be found at <https://substack.com/@jackpoulson>.

- 2 2. I am also the executive director and founder of Tech Inquiry, which investigates the
3 intersection of surveillance and weapons companies with governments. I founded
4 Tech Inquiry in 2019. Tech Inquiry is an independent legal entity. I write the
5 newsletter described in the preceding paragraph in my personal capacity and not as
6 an officer of Tech Inquiry.
7
- 8 3. Prior to starting Tech Inquiry and my newsletter, I was a senior research scientist at
9 Google Research. Prior to that I was an Assistant Professor of Mathematics at
10 Stanford University and an Assistant Professor of Computational Science and
11 Engineering at Georgia Tech.
12
- 13 4. In my newsletter, I have frequently reported on the connectedness of companies
14 making surveillance and weapons technologies and the governments that contract
15 with them. Among these companies is the one of which plaintiff Doe was formerly
16 the chief executive officer. I wrote about this company because of its role as a human
17 intelligence provider for U.S. Special Operations Command. This company has been
18 the subject of seven articles in my newsletters.
19
- 20 5. I received the Incident Report that is the subject of this matter unsolicited from a
21 confidential source. I did not request or otherwise seek out the Incident Report.
22
- 23 6. I was unaware that the Incident Report was sealed when I received it and wrote about
24 it. There was no marking on the Incident Report that I understood to indicate it had
25 been sealed. Upon receipt of the Incident Report, I communicated with the San
26 Francisco Police Department to verify the authenticity of the Incident Report. The
27 SFPD verified that the Incident Report was authentic that its contents were accurate.
28 The SFPD did not inform me that the Incident Report had been sealed.

7. I am currently in Lisbon, Portugal where I am speaking at a conference. I am nine hours ahead of Pacific Standard Time and have only intermittent internet access. The emergency nature of this proceeding without prior notice before November 12 has made it very difficult for me to fully participate in the preparation of the opposition papers.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 13 day of November 2024 in Lisbon, Portugal.

John A

Jack Poulson