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tori@eff.org  
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7 *Attorneys for Defendant Jack Poulson*

ELECTRONICALLY  
**FILED**  
*Superior Court of California,  
County of San Francisco*  
**12/06/2024**  
**Clerk of the Court**  
BY: SANDRA SCHIRO  
Deputy Clerk

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN FRANCISCO**

10  
11 JOHN DOE, an individual,

12 Plaintiff,

13 v.

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

18 Defendants.  
19  
20  
21

Case No.: CGC-24-618681

**DECLARATION OF VICTORIA NOBLE  
IN SUPPORT OF DEFENDANT JACK  
POULSON'S SPECIAL MOTION TO  
STRIKE UNDER THE ANTI-SLAPP  
STATUTE (CCP 425.16)**

**REDACTED**

DATE: January 6, 2025  
TIME: 9:30 a.m.  
DEPT: 302

Judge:

Action Filed: October 3, 2024  
Trial Date:

22 **PUBLIC**  
23

24 **Redacted Material from Conditionally Sealed Record**  
25  
26  
27  
28

David Greene (SBN 160107)  
Victoria Noble (SBN 337290)  
Electronic Frontier Foundation  
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San Francisco, CA 94109  
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Fax: (415) 436-9993  
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torii@eff.org

*Attorneys for Defendant Jack Poulson*

**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,

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**DECLARATION OF VICTORIA NOBLE**

I, VICTORIA NOBLE, declare as follows:

- I am an attorney licensed to practice in the State of California and am counsel for Defendant Jack Poulson in the above-captioned action. I have personal knowledge of the facts stated here, and if called upon to do so, could and would testify competently as follows:

1. Attached as **Exhibit A** is a true and correct copy of the home page of the “ [REDACTED] [REDACTED] website, as downloaded from [https://www.\[REDACTED\].com/](https://www.[REDACTED].com/) on Dec. 5, 2024.
2. Attached as **Exhibit B** is a true and correct copy of the article “ [REDACTED] by Jason Shueh, published on the *Government Technology* website on March 16, 2016, as downloaded from [https://www.govtech.com/top-25/\[REDACTED\].html](https://www.govtech.com/top-25/[REDACTED].html) on Dec. 5, 2024.
2. Attached as **Exhibit C** is a true and correct copy of the relevant pages of the public LinkedIn profile page for [REDACTED] as downloaded from [https://www.linkedin.com/in/\[REDACTED\]7740896/](https://www.linkedin.com/in/[REDACTED]7740896/) on Dec. 3, 2024.
3. Attached as **Exhibit D** is a true and correct copy of the webpage for the podcast “ [REDACTED] [REDACTED] as downloaded from [https://art19.com/shows/\[REDACTED\]](https://art19.com/shows/[REDACTED]) on December 5, 2024.
4. Attached as **Exhibit E** is a true and correct copy of the “Blog” webpage of the [REDACTED] website, as downloaded from [https://www.\[REDACTED\].com/blog](https://www.[REDACTED].com/blog) on December 5, 2024.
5. Attached as **Exhibit F** is a true and correct copy of the “Media” webpage of the [REDACTED] website, as downloaded from [https://www.\[REDACTED\].com/media](https://www.[REDACTED].com/media) on December 5, 2024.
6. Attached as **Exhibit G** is a true and correct copy of the “Disrupting Development: Keynote Part 2” webpage of the [REDACTED] website, as downloaded from [https://www.\[REDACTED\].com/post/disrupting-development-keynote-part-2](https://www.[REDACTED].com/post/disrupting-development-keynote-part-2) on December 5, 2024.

7. Attached as **Exhibit H** is a true and correct copy of the article “Coronavirus: Crowdsourcing Uses Today’s Technology for Realistic Data Collection,” by [REDACTED] published on *The Africa Report* website on June 22, 2020, as downloaded from <https://www.theafricareport.com/30502/coronavirus-crowdsourcing-uses-todays-technology-for-realistic-data-collection/> on December 5, 2024.
8. Attached as **Exhibit I** is a true and correct copy of the article “[REDACTED] America Needs to Get Back to the Office,” by [REDACTED] published on the *Daily Caller* website on June 3, 2022, as downloaded from [https://dailycaller.com/2022/06/03/\[REDACTED\]-america-needs-to-get-back-to-the-office/](https://dailycaller.com/2022/06/03/[REDACTED]-america-needs-to-get-back-to-the-office/) website on December 5, 2024.

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 5th day of December 2024 in San Francisco, California.

Victoria J. Noble  
Victoria J. Noble

# **EXHIBIT A**

**CONDITIONALLY UNDER SEAL**



## The High Cost of Review Fraud: How Fake...

2 hours ago



## Joe Biden Declares Himself a Lame Duck—...

22 hours ago



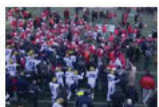
## South Korea's Democratic Crisis: A Stark...

1 day ago



## Joe Biden, Hunter, and the Power of a...

2 days ago



## The Decline of Respect in Rivalry Games: ...

4 days ago

1/3

READ PUBLICATIONS



[REDACTED] has spent more than 25 years building and leading high-growth technology companies, establishing himself as a prominent figure in the intersection of technology, civic innovation, and market intelligence. His career is defined by a unique ability to scale businesses, foster innovation, and deliver transformative impact across industries.

In 2017, [REDACTED] became the CEO of [REDACTED], a pioneering cyber-physical intelligence platform. Under his leadership, [REDACTED] developed a robust global network that combines machine learning and artificial intelligence to gather and analyze data from across the world. [REDACTED] spearheaded [REDACTED] efforts to serve government agencies, Fortune 500 companies, and NGOs, driving the company's evolution into a trusted source of actionable insights in rapidly changing environments.

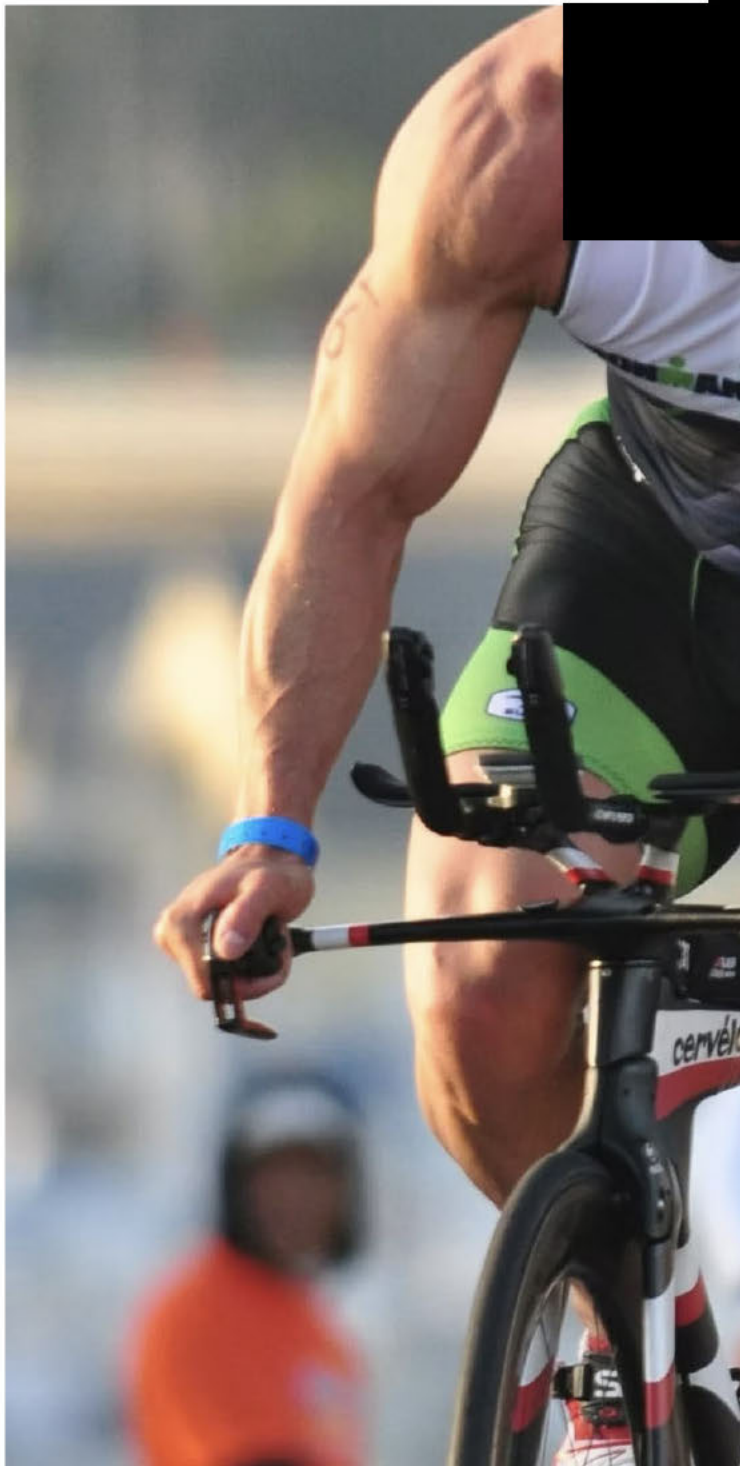
Prior to [REDACTED], [REDACTED] served as the CEO of [REDACTED], a civic-tech startup that transformed how governments interact with their communities. His leadership culminated in the 2016 Northern California Entrepreneur of the Year Award from Ernst & Young.

[REDACTED] was instrumental in driving [REDACTED] global expansion and its adoption by thousands of municipalities to streamline licensing, permitting, and public engagement processes.

[REDACTED] journey began after graduating from the University of Houston, where he earned a degree that set the foundation for his future success. He subsequently attended the Field Artillery Basic Course and served as an officer in the United States Army Reserves, where he developed strong leadership, discipline, and decision-making skills that would later define his executive career.

[REDACTED] is deeply committed to fostering innovation and entrepreneurship. As the Managing Director of [REDACTED], an early-stage venture capital firm he founded, [REDACTED] invests in and advises technology startups that are shaping the future. He has a proven track record of identifying promising technologies and supporting founders in scaling their businesses.





## ENDURANCE

Over the past 20 years, [REDACTED] has participated in over 100 endurance events including marathons, trail running, mountain biking, open water swims, cycling, and triathlons.

His primary focus is Ironman distance triathlons (2.4m swim, 112m bike, 26.2 run), completing 11 full and 20+ half ironman distances.

[REDACTED] completed Ironman World Championship 2x and 70.3 World Championship 3x in Clearwater, Las Vegas, and Mt. Tremblant.

IRONMAN WORLD CHAMPIONSHIP  
Kailua Kona, HI

IRONMAN COUER D'ALENE  
Couer D'Alene, ID

IRONMAN ARIZONA  
Tempe, AZ

IRONMAN CANADA  
Pendicton & Whistler, BC

IRONMAN AUSTRIA  
Klagenfurt, AT

IRONMAN LAKE PLACID  
Lake Placid, NY

## AWARDS

Ernst & Young  
Northern California 2016  
Entrepreneur of the Year

Government Technology

## BOARD MEMBERSHIPS



## EDUCATION

OFFICER LEADERSHIP COURSE  
Field Artillery Training Center  
Fort Sill, OK

MASTERS/POST BACC.  
Political Science/Democratic



## NOTABLES

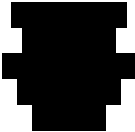
- B2B Executive with 25+ years experience
- CEO resume includes \$500M+ in capital raises, 15



Thought

**BACHELOR OF ARTS**  
Political Science  
University of Houston

**ADVISOR ROLES**



acquisitions, and 10X  
valuation growth

- Top Secret Clearance
- 11x Ironman Finisher
- U.S. Army Field Artillery  
Officer

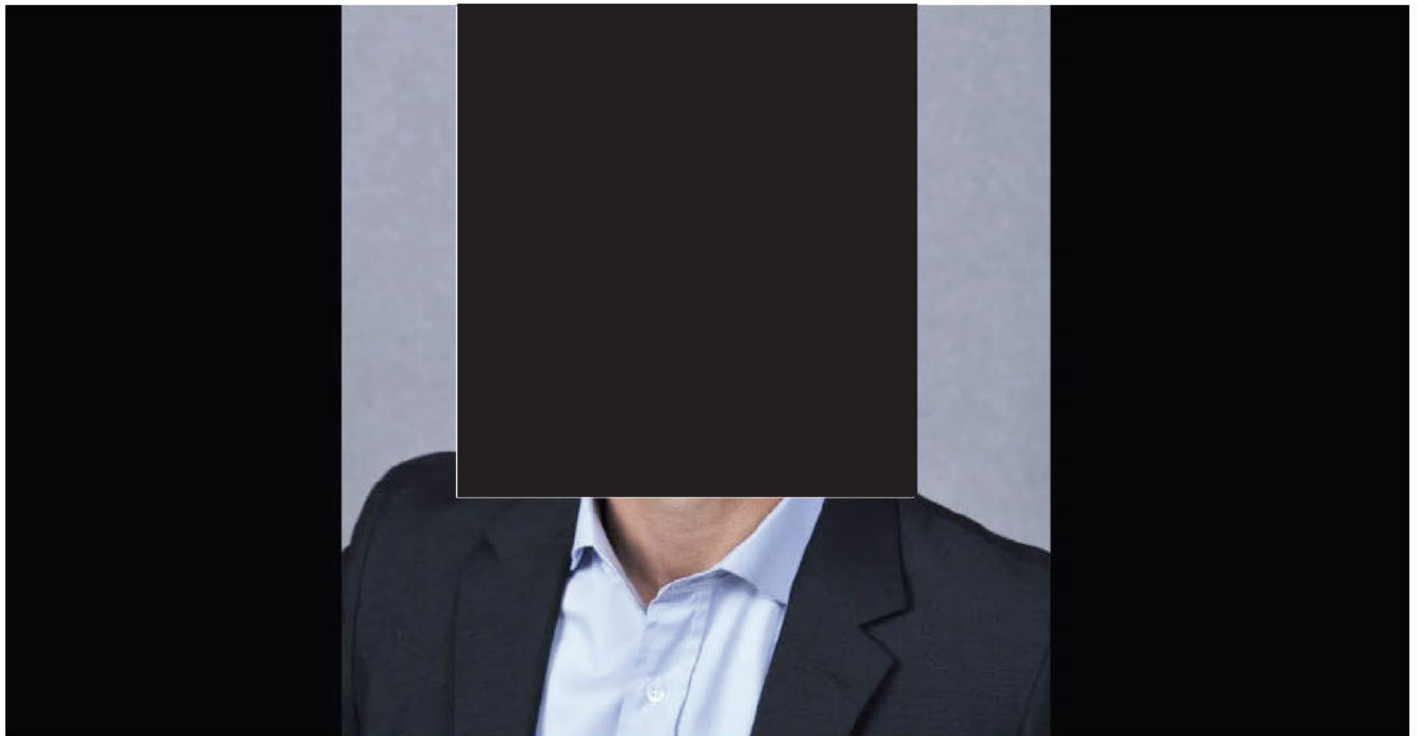







# **EXHIBIT B**

**CONDITIONALLY UNDER SEAL**

**TOP 25 DOERS, DREAMERS & DRIVERS**CEO, 

March 20, 2016 • Jason Shueh



If you dabble in government IT long enough you're likely to come across   
 He is a well known drum beater on the boulevard of civic reinvention and also happens to be the CEO and president of  a cloud software company focused on the government market.  can be heard in *The Huffington Post* pounding out the virtues of open data, or in *TechCrunch* trumpeting calls for in-house innovation teams, or in *Government Technology* op-eds where he explains and advocates for the latest civic strategies. From cloud to analytics to citizen engagement,  is both a pioneer and torchbearer for a host of technological advancements.

In 2015, this zeal for progress drove a couple of significant milestones.  attracted

more than \$233 million worth of new investments, money slated for a spate of govtech acquisitions and partnerships. The company launched its [REDACTED] in October, refreshing the cloud management service for its more than 2,000 city and county customers.

[REDACTED] said the past year's achievements for the company only reaffirm what he's long seen as the dawning of a great shakeup for government.

ADVERTISEMENT

"Over the years, much of the focus of our business has been about creating streamlined processes and efficiencies for government agencies," he said. "We're now seeing a very distinct shift in demand, for not only technologies that improve intra-office processes, but also apps and software that create lines of communication between governments and citizens."

To keep pace with the swiveling market, [REDACTED] acquired eight ventures in the past two years, and [REDACTED] said future additions must further the company's mission to be "impactful in the lives of residents and cities."

"This shift keeps me up at night, in the best way possible," he said. "I'm motivated by the prospect of citizen engagement becoming a true reality across cities."

ADVERTISEMENT

[\*Return to the Top 25 winners for 2016\*](#)

## Jason Shueh

Jason Shueh is a former staff writer for Emergency Management and Government Technology magazines.

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# **EXHIBIT C**

**CONDITIONALLY UNDER SEAL**





• 2nd

President &amp; CEO



- 
- University of Houston

San Francisco, California, United States · [Contact info](#)

500+ connections



Terry Kelliher is a mutual connection

[+ Follow](#)[Message](#)[More](#) Profile enhanced with Premium

## About

has more than 20 years' experience leading mission-driven, high-growth tech companies that make an impact by connecting communities and providing a more transparent world. In 2016, EY (Ernst and Young) awarded him the prestigious Northern California's Entrepreneur of the Year for his work as Chairman & CEO.

In February 2018, took the helm at a San Francisco company operating a software platform for empowering the world's highest impact institutions and companies to track and comprehend ground truth. Google Ventures, Andreessen Horowitz, Valor Equity Partners 8VC, and many others have invested \$100M+ in the platform that today touts more than ten million data contributors from 140+ countries. contributors collect data providing real time insights that drive decision making and solve humanitarian issues around poverty, health, human rights, education and the environment.

Before was CEO of a civic-tech startup aimed at moving citizen transactions from city hall to online and mobile services. He first served as VP of Sales and Marketing before assuming the role of CEO in 2007. was sold to Berkshire Partners in 2017.

Additionally, [REDACTED] is a board member at [REDACTED]

[REDACTED] holds a B.A. in Political Science from the University of Houston and currently serves on the Board of Visitors. He was a commissioned field artillery officer in the United States Army Reserves, serving on both active and reserve duty for 10 years. [REDACTED] is also an eleven-time Ironman finisher, including the 2008 and 2013 Ironman World Championship in Kailua-Kona.

## Activity

6,405 followers

+ Follow

[REDACTED] hasn't posted yet

Recent posts [REDACTED] shares will be displayed here.

Show all activity →

## Experience

### Advisor

Jul 2018 - Present · 6 yrs 6 mos  
San Francisco Bay Area

[REDACTED] solutions drive impact by giving governments the right tools and relevant data for more informed decision-making and bet ...see more

### Board Member

Feb 2020 - Present · 4 yrs 11 mos  
London, England, United Kingdom

### Board Member, Investor

Jun 2021 - Present · 3 yrs 7 mos  
Salt Lake City Metropolitan Area

### Advisor

Oct 2017 - Present · 7 yrs 3 mos  
San Francisco Bay Area

Unifying the commercial drone industry under one roof by providing the platform to connect developers, hardware partners, and pilots with...

### Managing Director

[REDACTED] · Full-time  
Nov 2015 - Present · 9 yrs 2 mos  
San Francisco Bay Area · On-site



Home | [REDACTED] | Technology Investments

[Show all 13 experiences →](#)

## Education



### University of Houston

BA, Political Science

Activities and societies: Sigma Chi Fraternity, Reserve Officers Training Corp.

## Skills

### Cloud Computing



Endorsed by John Wheeler and 1 other who is highly skilled at this



Endorsed by 4 colleagues at [redacted]



44 endorsements

### Business Analysis



Endorsed by Mitch Bradley who is highly skilled at this



Endorsed by 6 colleagues at [redacted]



8 endorsements

[Show all 27 skills →](#)

## Recommendations

[Received](#)[Given](#)

**Gus Viteri** · 3rd

Information Technology / Management / Capital Budget

December 28, 2016, Gus was [redacted] client

[redacted] was the inspiration and purpose behind [redacted] Inc. [redacted] personally involved himself with the product direction, design, features and functionality. [redacted] always led [redacted] by example, maintaining an open mind and always forward thinking, willing to understand and incorporated emerging technologies.

As a customer of [redacted] I was pleasantly surprised at the depth and breath of understanding [redacted] displayed and how he would easily...



**Jonathan Reichental, Ph.D.** · 3rd

CEO of Human Future | Professor | Adviser | Speaker | Coach | Investor | My Books, Videos, and More: [Reichental.com/Learn](https://reichental.com/Learn)

December 3, 2016, Jonathan worked with [redacted] but they were at different companies

career has demonstrated significant business vision, leadership, and execution skills. In the few years I have known he took a successful mid-sized government technology company, and built a powerhouse in the marketplace. He craft-fully took a business with more of a specialized focus, and created an enterprise that now meets services across government needs. He never deviated from his vision and took managed risk in executing on that vision. He attracted and recruited incredible talent. I've been impressed with ability to...

[Show all 6 received →](#)

## Languages

### English

Native or bilingual proficiency

### German

## Interests

### Top Voices

### Companies

### Groups

### Schools



### Jessica E. Lessin



· 3rd

Founder, editor-in-chief, CEO at The Information; co-host More or Less podcast

261,942 followers

+ Follow



### Tim O'Reilly



· 3rd

Founder and CEO, O'Reilly Media

679,826 followers

+ Follow

[Show all Top Voices →](#)



Victoria, explore relevant opportunities  
with Skadden

Get the latest jobs and industry news

Follow

## More profiles for you



### Brad King

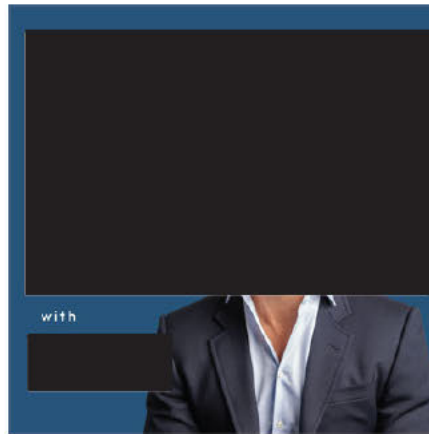


· 2nd

CRO, GTM Leader and Exec Team-member

# **EXHIBIT D**

**CONDITIONALLY UNDER SEAL**



Part of  
**Crossover Media**

**BUSINESS, NEWS, TECHNOLOGY**

business, data, economy, information, politics

©

is a serial entrepreneur who has led high-growth tech companies for more than 25 years. is also an active investor, board member, and advisor to many tech companies. Currently, is the CEO of a global on-demand data insight company.

shares exclusive insightful interviews from the most influential industry leaders in the world, covering prominent topics at the intersection of data and the worlds of business, politics, and economics. and his guests explore how commercial businesses and governments can use real-time data to make actionable decisions.

Data presented in each podcast episode is collected on-demand by app available on App store and Google Play store with over 4.5 million contributors in 135 countries around the world.





11/23/2022

## 2022 Midterms - The Global Rethink, Social Media, and Electoral Impact

My guest today is Frank Luntz, one of the world's most renowned and sought-after communications consultants and pollsters. We're also joined today by Lanny Davis who is a life-long democrat and well-known as the former White House Special Counsel to President Clinton.

Today we will explore and unpack the driving forces behind the 2022 midterms, social media's impact on the electorate, and finally what the most recent post-midterm [REDACTED] Poll reveals about former President Trump's 3rd run for President.

Play



Results Per Page

10 ▼

Search...



2022	7
November	2
October	1
September	1
August	1
July	2



11/02/2022

## Newt Gingrich - How the "Politics of Life" Drives Election Outcomes



With the 2022 Midterms a week away, my guest today is Newt Gingrich. Newt is the 2022 Man of the house and Time Magazine's 1995 "Man of the Year" led a revolution in 1994 as the co-author and architect of the contract with America. Under his leadership republicans swept the election, ending four decades of democratic control of the house. Two decades later, Newt remains a force in US politics through his speaking, writing, and his production company Gingrich360. In our conversation we focus on how political issues percolate to the top and become primary drivers of election outcomes, his thoughts on the upcoming midterms, and finally the US's current standing as a world leader.

00:00 / 59:48

Play



10/11/2022

## Larry Summers - The Inconvenient Truth of Economic Policy

My guest today is Larry Summers. Larry is one of America's leading economists. In addition to serving as 71st Secretary of the Treasury in the Clinton Administration, Dr. Summers served as Director of the White House National Economic Council in the Obama Administration, as President of Harvard University, and as the Chief Economist of the World Bank.

In today's episode, we will explore with Larry his thoughts leading up to his opinion piece in the Washington Post back in February 2021 and his thoughts on our current economic conditions, and most importantly how we should think



about navigating the turbulent seas ahead.

Some impor [REDACTED] | 2022 M...

00:00 / 59:48

Inflation, the Keystone pipeline, Student Loan Forgiveness, and the Federal Reserve's purpose, structure, and decision-making.

Play



09/22/2022

## John Rendon - War in Ukraine, China, and the 2024 Presidential Election

My guest today is John Rendon, one of the world's thought leaders in international and military affairs. John began his career in Democratic Party politics with George McGovern's 1972 presidential campaign. He later served as the Executive Director and Political Director of the Democratic National Committee and managed President Carter's 1980 Democratic convention in New York.

Today, John is considered to be the world's leading pioneer in the use of strategic communications as an element of national power and one of the first thought leaders to harness the power of emerging technologies in support of real-time information management. He has served as an executive communications consultant to the White House, the U.S. Department of Defense, the National Security community, and to the leadership of Fortune 500 companies.





In today's episode, we tapped John's knowl-  
edge to brea [REDACTED] | 2022 M...

00:00 / 59:48

pact on the European community, and the grow-  
ing nexus between Russia and China. We also  
discussed the upcoming midterm elections and  
theoretical matchups for the 2024 Presidential  
election that include how Liz Cheney's entrance  
into the race would increase the likelihood of  
another Trump Presidency.

Follow [REDACTED] and [REDACTED]

@ [REDACTED] | @ [REDACTED] | [REDACTED]  
website

Play



08/11/2022

## Alex Gladstein - Is Bitcoin The Next World's Currency?

My guest today is Alex Gladstein, Chief Strategy Officer at the Human Rights Foundation and author of the book "Check your Financial Privilege". Today's episode focuses on how Bitcoin is changing the landscape of the financial services industry and offers hope to many people who were born into a weaker financial system. The episode illustrates how Americans (which is only 4% of the world population) enjoy financial privilege from the dominant U.S. dollar system while 2 billion people live with double-digit inflation every day. Most of us think of Bitcoin as an investment opportunity, but there's ample data that shows bitcoin is fast becoming a transaction platform to move money across borders, protect savings from infla-



tion, and pay for services in many countries  
around the world.

| 2022 M...

00:00 / 59:48

crypto world's famous mantra "Not your keys,  
not your coins".

0:41 – Intro to Bitcoin and Alex Gladstein

3:50 – Financial Privilege and The Evolution of  
Global Currencies

23:40 – The U.S. Economy's Power

27:06 – Bitcoin as a Solution and Currency for  
the World

36:44 – Bitcoin's Impact in Countries with  
Lacking Financial Infrastructure

46:46 – Responding to Bitcoin Criticisms and  
Spreading Financial Freedom

57:00 – Alex's Three Insights for the World

Play



07/27/2022

## Lanny Davis - What America actually thinks: Trump vs. Biden

My guest today is Lanny Davis. Lanny became a household name in the late 1990s as a Special Counsel to President Bill Clinton during the Monica Lewinsky scandal and was a spokesperson for the President and the White House on matters concerning legal issues. Lanny is currently a lawyer, crisis manager, consultant, and author providing strategic counsel to clients under scrutiny on crisis management and legal issues by combining legal, media, and political strategies. Lanny is also a regular tele-



vision commentator and a political and legal analyst for M [REDACTED] | 2022 M...  
TV news programs.

00:00 / 59:48

At the time of this interview, [REDACTED] organized polling centered around the upcoming 2024 presidential election. The intent is to collect data tracking presidential candidates' polling numbers on a range of topics that are potentially important to election results.

0:44 – [REDACTED] and  
Lanny Davis

4:44 – The Inaugural [REDACTED] Presidential Poll

11:25 – 2024: Trump, Pence, DeSantis and  
Character

17:49 – The Democratic Base, Supreme Court  
and Polarization

25:56 – Independent Voters and Pragmatism in  
Politics

34:09 – The Media, Transitions of Power and  
President George W. Bush

40:45 – Family and Baseball

### **Referenced in the podcast:**

Trump and Biden in Virtual Dead Heat,  
According to The [REDACTED] Poll





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and

| 2022 M...

00:00 / 59:48

@  
website

Play



07/25/2022

## Trailer

Coming soon! Is your business two steps ahead or always one behind? If the latter, chances are you lack data insights to confirm your instincts. Here's the deal: leaders are trapped in a world where data and insights are still a luxury rather than a commodity. While you might have strong intuitions about your business, my guess is you're hampered by legacy institutions and capabilities that provide only surface level data and insights that do very little to validate your assumptions. Join me on a journey with some of the world's most notable minds who will share with you their secrets in capturing and making data-driven decisions that power their business. I'm and this is

Play



Showing 1 to 7 of 7 Episodes

< 1 >



# **EXHIBIT E**

**CONDITIONALLY UNDER SEAL**

## MEDIA



19 hours ago

## Joe Biden Declares Himself a Lame Duck—Oops, I Mean “Final Weeks of His Presidency”

Sometimes, the President of the United States delivers a speech so impactful, so memorable, and powerful that it leaves us pondering the...



1 day ago

## South Korea's Democratic Crisis: A Stark Contrast to North Korea and a Test of U.S. Commitment

South Korea's democracy is facing its gravest challenge in decades. President Yoon Suk Yeol's imposition of martial law represents a...



2 days ago

## Joe Biden, Hunter, and the Power of a Presidential Pardon

Joe Biden's decision to pardon his son, Hunter Biden, marks one of the most polarizing moves of his presidency and political career. This...

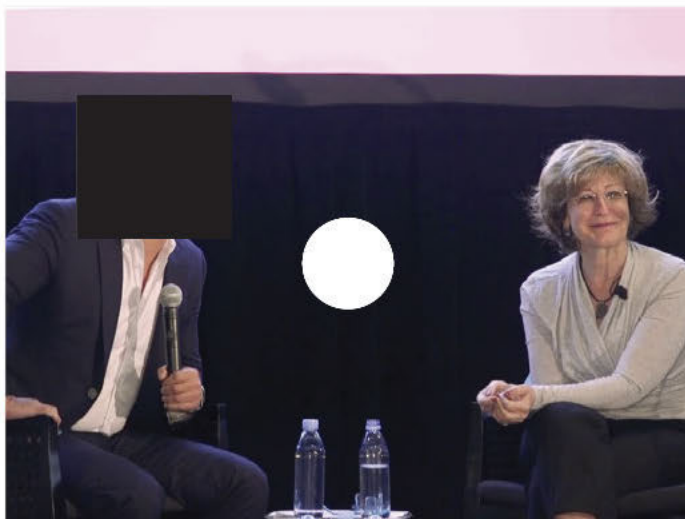


Blog | [REDACTED]

4 days ago

## The Decline of Respect in Rivalry Games: A Call for Decency and Tradition

This past weekend marked one of the most exciting traditions in sports: college football rivalry weekend. These iconic games showcase...



Sep 19, 2019

## Disrupting Development: Keynote Part 2

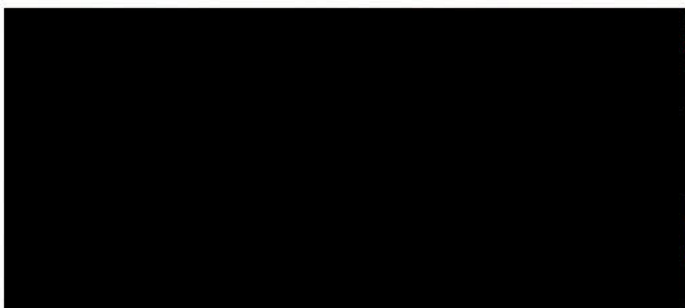
Keynote (Part 1) Bonnie Glick, Deputy Administrator of the US Agency for International Development and [REDACTED] CEO of [REDACTED]



Sep 19, 2019

## Disrupting Development: Keynote Part 1

Keynote (Part 1) Bonnie Glick, Deputy Administrator of the US Agency for International Development and [REDACTED] CEO of [REDACTED]



Nov 14, 2018

[REDACTED] [REDACTED]  
Nov 14, 2018 Real-time data collection through mobile technology is key to making development more effective, says [REDACTED] [REDACTED]





Jun 12, 2018

## Devex World 2018: From Data to Action

June 12, 2018 How can we turn data insights into practice? President and CEO discusses key themes and takeaways...



Jun 12, 2018

## Devex World 2018: Acting on the data revolution

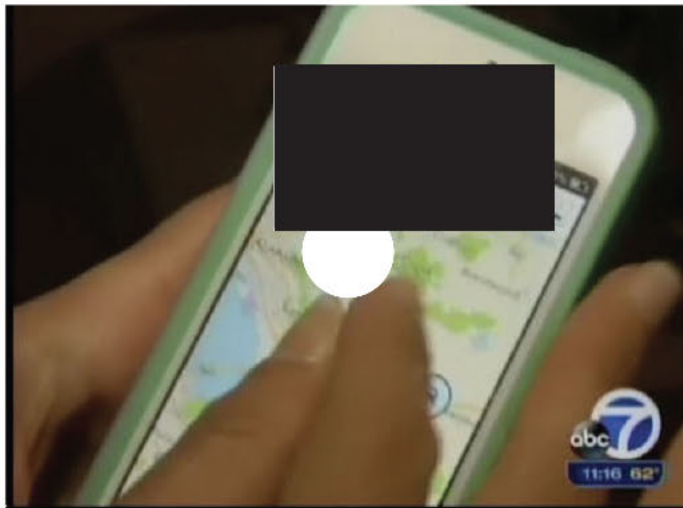
June 12, 2018 President and CEO shares practical guidance for acting on data insights.

Mar 6, 2015

## Bloomberg West

March 6, 2015





May 18, 2013

## KGO ABC 7

May 18, 2013

# **EXHIBIT F**

**CONDITIONALLY UNDER SEAL**

## MEDIA

## MEDIA



## Joe Biden Declares Himself a Lame Duck—Oops, I...

19 hours ago



## South Korea's Democratic Crisis: A Stark Contrast t...

1 day ago



## Joe Biden, Hunter, and the Power of a Presidential Pardon

2 days ago

1 2 3 4

## PUBLICATIONS

06/22/20

### Coronavirus: Crowdsourcing uses today's technology for realistic data collection

The Africa Report

11/08/19

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# **EXHIBIT G**

**CONDITIONALLY UNDER SEAL**

MEDIA



Sep 20, 2019

# Disrupting Development: Keynote Part 2

Keynote (Part 1)

Bonnie Glick, Deputy Administrator of the US Agency for International Development and [REDACTED] CEO of [REDACTED]

## Disrupting Development Conference

September 19, 2019 - Washington, D.C.

### About the Event

*Disrupting Development: How the Data Revolution will Radically Increase Development Impact* was a one-day educational and progressive gathering of thought leaders, influencers and senior policymakers from the international development community. Brought to you by [REDACTED], IBM, IBTCI and Fraym, the conference focused on how the data science methodologies that contributed to the rise of Silicon Valley enterprises can be applied to international development.

While digital technology holds the promise of improved results, the prevailing practice of running scores of pilots has created a sense of activity but little actual progress or strategic shift in the development industry. Traditional measurement and evaluation (M&E) approaches are not adaptive or operations-focused enough to improve outcomes in real-time.

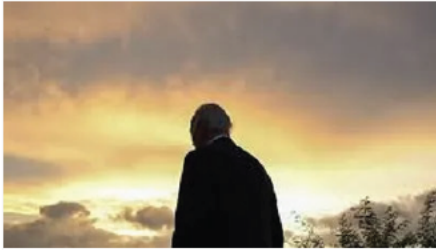
Hear from a variety of innovative tech companies, as well as leading donor organizations (list of speakers below), on adopting a data-driven approach to reshaping the development landscape. Conference highlights and videos are available here.

- Chris Watson, Business Development Manager, International Development Market, [REDACTED]
- Bonnie Glick, Deputy Administrator and Chief Operating Officer, USAID
- Aisha Kasali, Global Health Fellow at the Bill & Melinda Gates Foundation
- Caroline Andresen, Team Leader, Office of U.S Foreign Disaster Assistance
- Sawyer Baker, Manager 211 at United Way Worldwide
- Jason Ladnier, Interagency Senior Advisor for Security and Stabilization at United States Institute of Peace

- Glenn Finch, GM and Global Leader of Cognitive Business Decision Support, IBM
- Ngozi Onwuaduegbo, Senior Managing Consultant of Cognitive Business Decision Support, IBM
- David Stanton, Director, office of HIV/AIDS, USAID

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# **EXHIBIT H**

**CONDITIONALLY UNDER SEAL**

**DATA COLLECTION**

## Coronavirus: Crowdsourcing uses today's technology for realistic data collection

By [REDACTED]

Posted on June 22, 2020 14:40



A [REDACTED] Contributor captures a photo of an open market in Burkina Faso ([REDACTED] Contributor)

China, Western Europe, the United States and Brazil have thus far been the regions hardest hit by the COVID-19 pandemic. The virus has also been spreading across the African continent and threatening to devastate vulnerable populations and overwhelm an already fragile healthcare system.





## LISTEN **North Africa and coronavirus: “massively insufficient” measures**

**Unlike with past pandemics**—even those that occurred in the relatively recent past like 2003's SARS and 2009's H1N1—this time organisations have been able to use technology more nimbly in an effort to both curb the spread and determine where people need resources acutely.

### Smartphones: a powerful tool

As citizens throughout Africa **bypass landlines and acquire smartphones**, the potential to use technology to engage large numbers of citizens in an effort to support economic and human development rises exponentially. What's more, crowdsourced data collected via smartphones allows unparalleled insight into the communities where such insight is desperately needed.

**“***Crowdsourced data is also often more reliable than data collected from surveyors or data collectors,*

**Crowdsourcing is just one example of how the adoption of technological solutions** is accelerating during this pandemic. Video conferencing, online shopping for basics, including groceries, touchless interfaces, etc. are likely to be business-as-usual going forward.

**A population armed with a simple tool, like a smartphone**, coupled with enterprises that employ machine-learning, gives aid organisations and public health authorities the opportunity to collect massive amounts of information, make sense of it, and then act on it. In the current climate, crowdsourcing can also provide real-time glimpses of realities in places where data is notoriously hard to collect.

**READ MORE** [\*\*Africa needs more health data to improve response to health crises\*\*](#)



citizens have also shared first-hand observations—including photos showing adherence to social distancing—and alerted health authorities about the sources of misinformation campaigns, and shared photos of empty (and well-stocked) store shelves.

**In short, when people are out conducting their activities of daily living,** they are able to provide information about what sorts of supplies are available and which are in short supply.

## A more accurate picture on the ground

The information they collect demonstrates how real-time, citizen-generated data can inform a more accurate picture of realities on the ground, and support programme implementation. **Crowdsourced data is also often more reliable** than data collected from surveyors or data collectors simply because the volume of data collected is so much greater. It's also possible to collect crowdsourced data in real-time, with actionable analytics.

In the context of COVID-19, crowdsourced data can demonstrate that residents living in certain regions are neither wearing masks when in public, nor observing social-distancing recommendations. With such information, health authorities could elect to focus messaging on the importance of these strategies.



An open-air market in Yemen ( [REDACTED] Contributor)

Technological innovations can also provide aid organizations and authorities with a more detailed account of dynamic situations on the ground that traditional methods may not always capture. Tools that illustrate change over time, such as heat maps of specific neighbourhoods, can be invaluable in determining what resources are most needed in challenging environments.

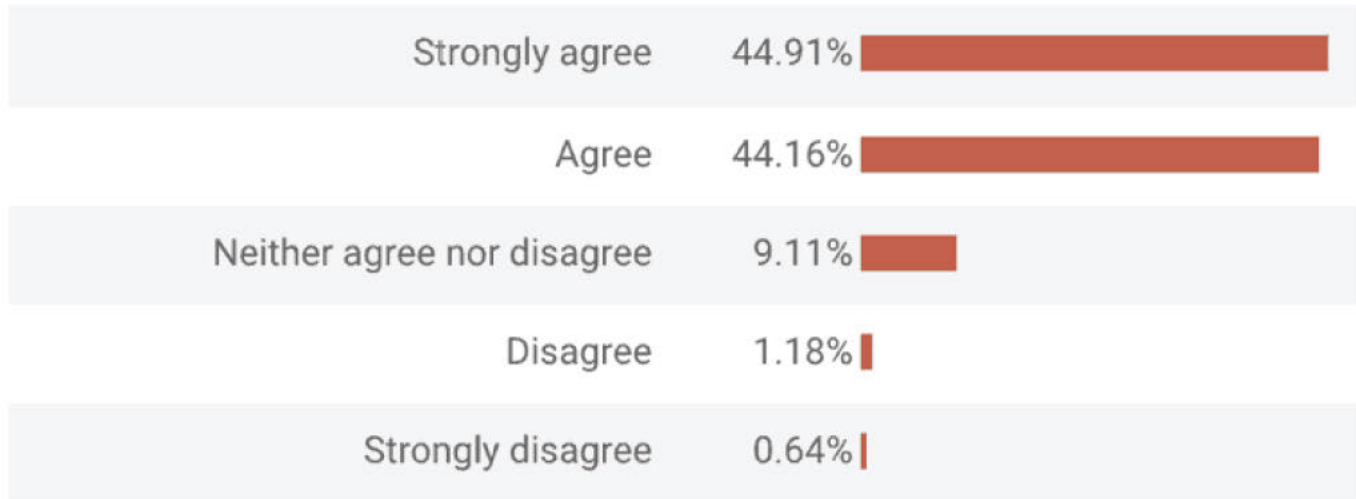
### READ MORE [Technology to fight COVID-19 in the Developing World](#)

Understandably, the unpredictable spread of COVID-19 has led to equally uneven government responses; to date, Morocco and Tunisia have taken the strongest control measures, issuing nationwide shelter-in-place orders on 18 and 20 March, respectively.

Egypt, Kenya and Algeria implemented overnight curfews for a growing number of areas between March 24-27, while Nigeria issued stay-at-home orders for three of its states at the end of March. (30 March for Lagos, Ogun and Abuja, its most populous states.)



statement 'Social distancing can help by preventing a spike in Coronavirus cases so we don't overwhelm the health system'



**Bottom line:** Crowdsourcing as a means of data collection **is here to stay and it makes it possible to closely monitor sentiments** in developing countries and understand the potential impact of citizens' behaviours as these countries' infections rise so authorities and organisations can take appropriate action.

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By

President and CEO of [REDACTED] He is also a board member at [REDACTED] and serves as an advisor to the [REDACTED].

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# **EXHIBIT I**

**CONDITIONALLY UNDER SEAL**

Daily Caller - <https://dailycaller.com>

## OPINION

# America Needs To Get Back To The Office



OPINION



CONTRIBUTOR

June 03, 2022

11:37 AM ET

FONT SIZE: + -

Taskrabbit CEO Ania Smith and Brian Chesky of Airbnb made waves in the tech industry by announcing that all their employees will be allowed to work from home permanently. Elon Musk then made his own waves by announcing the opposite.

I have a friend whose daughter manages callers looking for sellers of residential homes to third party investors. And she agrees with Musk: She knows remote working is not the same, whether is in Silicon Valley or real estate or a law firm. There are reasons why even if you can do the same thing on a telephone from home, or a Zoom call, it still loses something. Something valuable. Here are a few reasons it's time to come back to work – at least, that should be a goal.

At the pandemic's onset, we listened to our public health authorities and shut down our lives to save others. Restaurants were shuttered, travel was restricted, kids went to school on the computer and businesses moved online. Two years later, we are once again traveling, enjoying meals at restaurants and learning on campuses. You'll notice I didn't say that we're back in the office ...

Today, we're witnessing a push to fundamentally change how we work. Rather than coming to the office, many employees are fighting to work remote permanently. Their most common argument is that they can perform every function of their job from afar. Yet, just because something *can* be done one way, does not mean that it *should*. I am not advocating for a swift and sudden return to five days a week in the office with no flexibility, but there are a few simple reasons for why in-person work should be our north star.



## The Workplace Is for Learning

Coming into the office allows employees to experience company culture, new ideas and the way that company does its business. This is learning, or in other words, training. Training helps us learn how to function as a unit; how to support our teammates; how to make effective presentations; how to receive and provide constructive feedback. Each lesson is critical to building a thriving workforce.

Certain companies now elect to bring employees together once or twice a year to substitute for workplace learning. While this may seem like a novel approach, the Department of Defense has deployed it for years through the military reserves. Reservists meet for one weekend each year and then spend two weeks training together.

As a former reservist, I know first-hand that our units were not as cohesive, nor did they learn as much about their teammates and duties, as those that trained together year-round. Though tech companies' work can't be compared to the military's, at the end of the day, the principle is the same. We learn from each other and grow when we're together – not when we're apart.

## **The Workplace Is for Creating**

When you put a group of capable team members in a room and present them with a challenge, magic happens. That creative process gets stymied when it is digitized and happens over video conferencing apps.

No matter who you are or what you're working on, video conferencing allows for endless distractions – from barking dogs to honking cars to commotion in the house. We all try our hardest to stay focused on our endless video calls, but there is an obvious drop-off in how close both managers and employees pay attention.

This reduces the energy level of a conversation. Our creative juices flow best when we're energetic about what we're working on and fully engaged. Over video, an invisible barrier exists that prevents full engagement.

## **The Workplace Is for Socializing**

Amid this debate, one often overlooked topic is the value of social relationships and interactions in the workplace. These relationships provide employees with both meaning and happiness. For one, teams work better when their members are close. Second, when employees are happy, they tend to stay with their companies longer.

There are countless studies about how social withdrawal can lead to loneliness, which can easily become depression. When an employee isn't going into the office,

they withdraw socially. This social withdrawal can have a serious impact on employees' states of mind, and as a result, their work product can suffer.

## A Necessary Inconvenience

None of this is to say that work can't be done at a high level away from the office. It can, and the last two years show it. It does, however, imply that we aren't doing our best work away from the office – and with tech companies so dependent on growth, they need their employees to constantly strive for their best.

Coming into the office every day is an inconvenience – it can't be denied. And of course, being flexible to the needs of employees is critical, as a lack of flexibility can also create an unhappy workforce. Yet, at some point, when remote work creates a drop-off in quality, that inconvenience becomes necessary. There's a happy medium to be found, but working from the office must remain the norm to foster both productivity and efficiency.

*██████████ has led high-growth tech companies for more than 25 years and is currently CEO of ██████████ a global platform that democratizes the way actionable insights are sourced and used by organizations in over 125 countries.*

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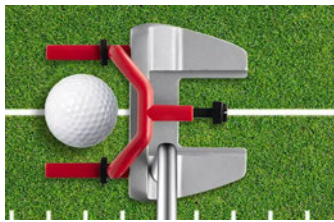


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DP Dylan Pittman

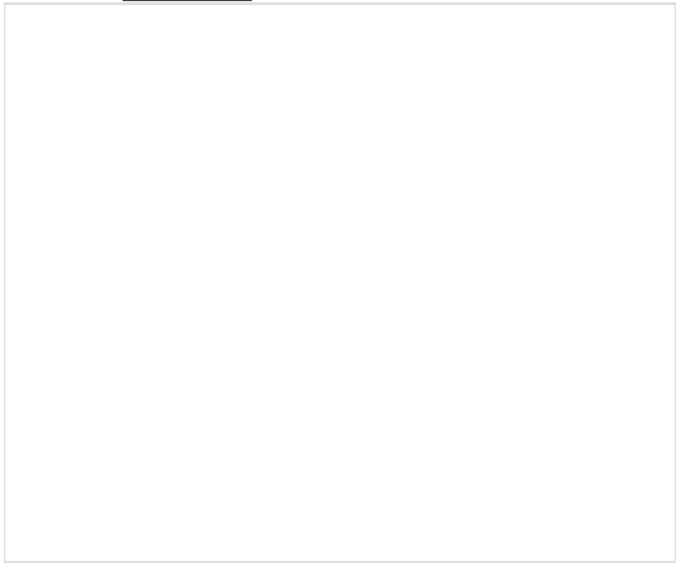
4 June, 2022

Interesting, it seems that in the four years since I stopped having to tolerate working for █████ he appears to still be an insufferable leader and is no closer to being able to relate to his employees in any capacity. Not surprising, but interesting.

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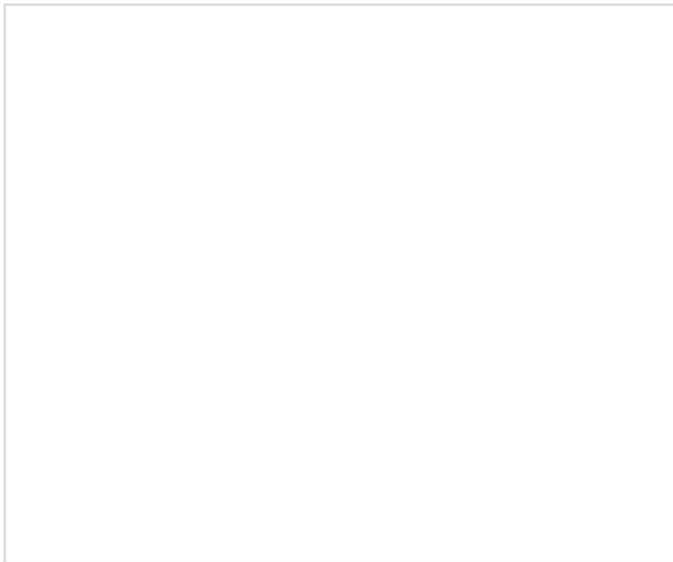
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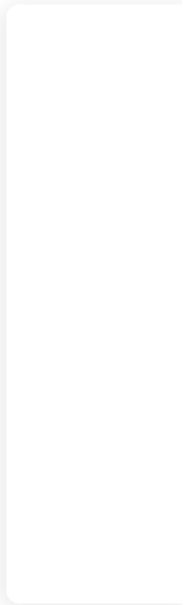
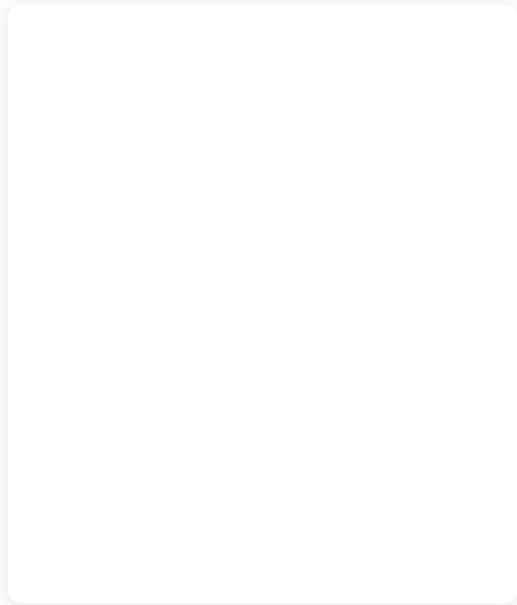
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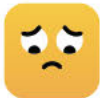


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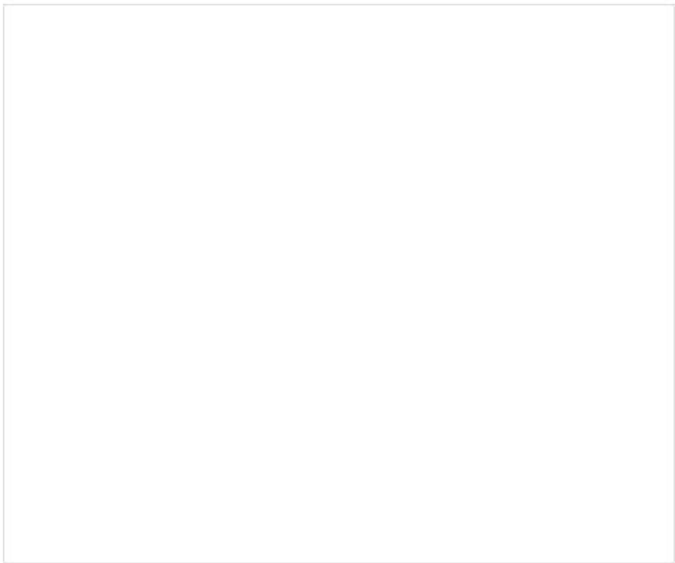
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