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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Family Court

Family Court Case No. 2022-DR-10-3072

Appellate Case No. 2023-001376

Justin McGee, Respondent,

v.

Lindsay F. McGee, Petitioner.

MOTION TO SUPPLEMENT THE RECORD

COMES NOW the Petitioner, Lindsay F. McGee, by and through her undersigned counsel, and respectfully moves this Honorable Court to supplement the record in this matter based upon newly discovered evidence.

Background and Procedural History

Petitioner Lindsay F. McGee and Respondent Justin M. McGee are involved in a pending matter in the Charleston County Family Court entitled Justin M. McGee v. Lindsay F. McGee, case number 2022-DR-10-3072. Petitioner filed a Motion to Suppress Evidence in this court on August 30, 2023 and filed an Amended Motion to Suppress Evidence on September 1, 2023 to “clarify the relief requested in the Motion.” (Am. Mot. to Suppress Evid.)

Petitioner’s Amended Motion to Suppress alleged, *inter alia*, that

Respondent committed numerous interceptions of her electronic and aural

communications in violation of the South Carolina Homeland Security Act (SC Code of Laws §17-30-10, *et seq*) and the Electronic Communications Privacy Act (18 USC §2510, *et seq.*) ... when he secreted at least six Wi-Fi connected hidden cameras with microphones within petitioner's home without her knowledge and used them to monitor and record her conversations, including with her attorneys, for over a year. (Am. Mot. to Suppress Evid. ¶ 19)

Upon a search of her home, on July 22, 2023, Petitioner identified some power adapters that Respondent installed in her home. (Am. Mot. to Suppress Evid. ¶ 12). This device appeared to have been purchased from SCS Enterprises. Therefore, Petitioner issued a Subpoena to SCS Enterprises to obtain the purchase history for the surveillance camera which indicated a total of five (5) devices, with audio capability, identical to the device that was found by Petitioner in her garage were purchased by Respondent and shipped to Respondent's office address at 125-A Wypoo Creek Drive, Suite A, Charleston, SC 29412. (Am. Mot. to Suppress Evid. ¶ 14).

The router logs in the McCutcheon house establish the presence of thirteen (13) spying devices which accessed Petitioner's WiFi in the McCutchen House (Bumgarner Aff. ¶ 42). The covert surveillance camera that Respondent purchased from SCS Enterprises was the WF-113 model and has the default name of GF-PH130. (Am. Mot. to Suppress Evid. ¶ 15; Bumgarner Aff. ¶ 42). Petitioner's router log files indicate that there had been six different GF-PH130 named devices that have authenticated and connected to the Wi-Fi network in Petitioner's home. (Am. Mot. to Suppress Evid. ¶ 15; Bumgarner Aff. ¶ 42). An examination of the device by Mr. Steve Abrams revealed that the SD card embedded in the device contained video and audio recordings. (Abram's Aff. ¶ 5).

The Affidavit of Respondent Justin McGee in Opposition to Petitioner's Amended Motion to Suppress admits that he used "nanny cameras" at Petitioner's house (McCutchen House) but that he removed the cameras from the McCutchen house over the summer of 2022. (McGee Aff.

¶¶ 61, 62). Respondent further alleges that the camera identified in Petitioner’s Motion was inadvertently left on a shelf in the garage, but that camera model was not capable of capturing audio. (McGee Aff. ¶¶ 63, 64). Respondent further alleged that the Subpoena response Petitioner received from SCS Enterprises was not complete and informed this Court that he purchased four SCS outlet cameras from Amazon in July 2021 that did not have the ability to capture audio and that it was one of these cameras that was purchased from SCS through Amazon that was mistakenly left in Petitioner’s garage. (McGee Aff. ¶¶ 65, 66). This was the first time Petitioner learned that Respondent had purchased similar cameras without audio capability.

Respondent’s Return to Petitioner’s Amended Motion to Suppress Evidence concludes that “even assuming the camera was plugged into a power source, installed and set up for live monitoring – three assumptions belied by the record – no “interception” via live *audio* monitoring could have occurred within the purview of the Homeland Security Act or the Federal Act.” (Respondent’s Return p. 16)

Petitioner acknowledges that the device found in her garage was not one of the five devices Respondent purchased directly from SCS that contained audio, and that the devices found in her garage was likely purchased from SCS through Amazon and had no audio capability. However, Respondent admits that he purchased five (5) directly from SCS that did have audio recording capability. (Leonard Affidavit ¶ 19; exhibit E). As stated above, the WF-113 model of the covert surveillance camera that Respondent purchased from SCS Enterprises has the default name of GF-PH130 and Petitioner’s router log files indicate that there had been six different GF-PH130 named devices that have authenticated and connected to the Wi-Fi network in Petitioner’s home. (Am. Mot. to Suppress Evid. ¶ 15; Bumgarner Aff. ¶ 42). It is undisputed that Respondent only purchased four (4) of these cameras that did not have audio, so it is axiomatic that at least two (2) of those

six (6) cameras of the same nomenclature identified on Petitioner's router logs had audio capability.

Newly Discovered Second Camera With Audio Capability

On November 1, 2023, Petitioner discovered another device Respondent installed in the McCutchen house which she delivered to Steve Abrams. Mr. Abrams made a forensic image of the SD card and, upon examination, discovered 4,966 jpg video still images, 4,960 MP4 videos, and sound recordings during the time periods May 15, 2022, June 30, 2022, July 16-18, 2022, August 24 through October 3, 2022. (Abrams Second Supp. Aff. ¶¶ 5,6). The device was then sent to John Bumgarner via Federal Express for examination. Mr. Bumgarner's analysis of the device concluded that the device had WiFi capability. (Bumgarner Second Supp. Aff. ¶ 5,6) Additionally, Mr. Bumgarner was able to identify the MAC address on this second device which was one of the addresses he also identified on log files on Petitioner's WiFi at the McCutcheon home. (Bumgarner Second Supp. Aff. ¶ 7). Unquestionably, data from this device was being transmitted via Petitioner's Wifi.

Petitioner is informed and believes that this newly discovered evidence, the second video recording device with audio capability, refutes numerous sworn statements by Respondent and conclusively establishes that Respondent did not remove all the recording devices from Petitioner's home and that he did, in fact, place video spy cameras in her home that had audio recording capability. Respondent's defense is that because the camera Petitioner found in her garage was ultimately determined not to have audio, "no interception via live audio monitoring could have occurred within the purview of the Homeland Security Act or the Federal Act." (Return, p. 16). However, that defense has been dispelled based upon the newly discovered evidence and Respondent's summary statement that "Wife's claim that Husband intercepted her

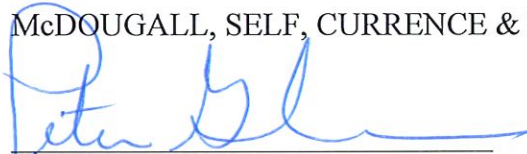
communications using a nanny camera at McCutchen is supported only by her expert's working theory" is merit as the newly discovered evidence proves that Respondent did, in fact, place recording devices with both video and audio capability in Petitioner's home.

Conclusion

Petitioner requests that the court supplement the record to include the attached Second Supplemental Affidavit of Steve Abrams and Second Supplemental Affidavit of John Bumgarner, as well as additional evidence regarding the CAMDUCK spy camera as may be necessary to support her request to suppress evidence in the pending family court case.

Respectfully submitted,

McDOUGALL, SELF, CURRENCE & McLEOD, LLP



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November 3, 2023

**SECOND SUPPLEMENTAL
AFFIDAVIT OF
JOHN BUMGARNER**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Family Court

Family Court Case No. 2022-DR-10-3072

Lindsay F. McGee Petitioner

v.

Justin McGee Respondent

SECOND SUPPLEMENTAL AFFIDAVIT OF JOHN BUMGARNER

PERSONALLY APPEARED BEFORE ME, the undersigned, who, being duly sworn, deposes and states the following:

Background

1. My name is John Bumgarner. I am a retired member of the US Armed Forces, where I specialized in intelligence and special operations. I have performed work for the Central Intelligence Agency, Defense Intelligence Agency, National Security Agency and the United States Special Operations Command. My current fields of concentration are cybersecurity and network forensics. I have a Master Degree in Information Systems and one in Security Management. I have been a Certified Information Systems Security Professional (CISSP) for 24 years and a Systems Security Certified Practitioner (SSCP) for 22 years. I have assisted in the exam development for both of these internationally recognized cybersecurity certifications. I was one of the first GIAC Incident Handler (GCIH) certified worldwide. I have published dozens of articles on cybersecurity and cyberwar. And I have lectured on these topics at the Naval Postgraduate School, King's College London, Queen's University Belfast and other institutions. Some of my research in my fields of expertise have been used by multiple organizations, including the Atlantic Council, Department of Defense and the North Atlantic Treaty Organization (NATO). This research has also been used in hundreds of articles, books and studies that have been published. Additionally, I have consulted on various projects with the Federal Bureau of Investigation, the United States Secret Service and the Department of Homeland Security. I am currently based out of an office in Asheville, North Carolina. My full credentials are included in my CV which is appended to this affidavit.

2. On Monday, July 10, 2023 the law firm McDougall Self Currence McLeod headquartered in Columbia, South Carolina retained my consulting services to investigate alleged cyber intrusions into various accounts owned by their client Lindsay McGee. My role has now become that of a testifying expert.
3. My investigation into the alleged cyber intrusions and spying allegations required a detailed analysis of multiple pieces of technical data and non-technical information spanning back to January 2021. New evidence has been obtained since filling my supplemental affidavit in October 2023. This second supplemental affidavit is related to a recently discovered covert spy camera found in Lindsay McGee's bedroom.

History

4. On Monday, November 01, 2023, Pete Currence from McDougall Self Currence McLeod called me about a newly discovered covert spy camera found in Lindsay McGee's bedroom. During the call I was sent several photos of the devices. (Exhibit A) Immediately we determined that this device needed to be analyzed.

Hidden Surveillance Camera

5. On Wednesday, November 01, 2023, Lindsay McGee provided the device to Steve Abrams. of Abrams Cyber Law & Forensics based in Mount Pleasant South Carolina, also working forensics on this case for attorney Peter Currence. Mr. Abrams established a chain of custody document for this device. Mr. Abrams made a forensic image of the 32 GB SD card that recorded data created by the device. After making this image Mr. Abrams sent the device to me via FEDEX with the chain of custody document. I received this device on Thursday, November 02, 2023.
6. After receiving the device I started a technical analysis to determine the device's manufacturer and its capabilities. This device in question had WiFi capabilities, which exposed the manufacturer's name via its default Service Set Identifier (SSID) or Wi-Fi network name. The default name was CAMDUCK-493937. (Exhibit B) This name format is a standard one used for covert spy cameras manufactured by CAMDUCK (<https://camduck.net>). A search of the vendor's website identified the device as the CAMDUCK-5U-BLACK. (Exhibit C) The device's features include motion detection; automated alarms to remote devices, such as a mobile phone when motion detection is activated and remote viewing and management using the CIXICM application, which is available on the Apple Store and Google Play. The vendor's website also states that the device has the capabilities to record audio with a video recording. On Thursday,

November 02, 2023 Steve Abrams confirmed that there were 4,960 MP4 videos on the 32 GB SD card. And that each of these videos had an audio track.

7. The device broadcasted the Wi-Fi network CAMDUCK-493937, which I was able to connect to using the default password "camdog66." (Exhibit D) Once connected to the device I obtained the MAC address linked to the embedded Wi-Fi components. The MAC address was 0c:cf:89:a4:02:8a, which is assigned to Shenzhen Billian Electronics Corporation Limited. (Exhibit E) I cross-referenced this MAC address with the device log file obtained on Saturday July 29, 2023 from the Arris BGW210-700 (DSL modem) used at Lindsay McGee's private residence. The same MAC address was listed in this log file. (Exhibit F) Steve Abrams' forensics analysis has confirmed that the covert spy camera with the MAC address 0c:cf:89:a4:02:8a has been recording videos with audio tracks since at least May 2022. Sean Leonard has previously confirmed that the router logs are highly accurate as a method to identify devices that have accessed Ms. McGee home network. (Leonard Aff. ¶ 22.). These router logs have indicated that 13 spy cameras identified by their names and their Wi-Fi components have been installed in Ms. McGee's private residence without her knowledge or consent.

Respondent suggests that a power outage impacts the spy camera configuration

8. Justin McGee had previously stated "if the device <spy camera> is unplugged or otherwise loses power, the user must repeat the process of connecting the application <IoT management software> and then to a wireless network to access the device or record remotely. (McGee Aff. ¶ 68.) This statement is incorrect. The 9 spy cameras manufactured by SCS Enterprises and purchased by Justin McGee have an internal battery, which allows the camera to maintain its last configuration. The vendor's manual for the WF-113 states "*when the camera is all set up, you can unplug the camera and move to another room, As long as the camera is placed within the same <Wi-Fi> network, it will automatically re-connect to the router.*" The recently discovered spy camera manufactured by CAMDUCK also works in the same manner when unplugged and reconnected on the same Wi-Fi network.

Respondent indicates that cameras were removed from McCutchen residence in 2022

9. Justin McGee states that he removed these spy cameras from Ms. McGee private residence in the Summer of 2022. (McGee Aff. ¶¶ 62, 63; Return p. 3). This is most likely false based on the bandwidth logs associated with Ms. McGee's internet service. The AT&T bandwidth records provide information on the number of gigabytes of data that is either being downloaded or uploaded through Ms. McGee's home internet service. Most consumers have higher download usage than upload usage. This is due

to users watching streaming content, such as Netflix or YouTube and accessing sites with high graphical content, such as Facebook or Instagram. The bandwidth records show that for several months in late 2022 there were large spikes in the amount of data being transmitted out of her home network. Streaming surveillance video from multiple spy cameras would create these bandwidth spikes. These anomalies occurred between Friday, August 26, 2022 to Sunday, September 25, 2022, Monday, September 26, 2022 to Tuesday, October 25, 2022, Wednesday, October 26, 2022 to Friday, November 25, 2022 and Saturday, November 26, 2022 to Sunday, December 25, 2022. The largest spike occurred between Friday, August 26, 2022 and Sunday, September 25, 2022. During this period 88 gigabytes of unknown data was transmitted out of Ms. McGee's home network. (Exhibit F) The uploaded data for this period was greater than the downloaded data. Ms. McGee's average monthly bandwidth utilization for outbound internet data is usually under 20 gigabytes. Steve Abrams' forensics analysis has confirmed that the CAMDUCK spy camera was recording videos with audio tracks during the bandwidth anomalies periods.

Best Spy Camera Evidence in Respondent's Possession

10. Justin McGee has admitted to installing multiple spy cameras in Ms. McGee's private residence starting in 2021 (McGee Aff. ¶ 20.) and allegedly removing them in the Summer of 2022. (McGee Aff. ¶ 61.) There is technical evidence indicating that at least 13 spy cameras were once deployed inside Ms. McGee's residence. We have recovered 2 of these 13 spy cameras. Justin McGee's purchase records indicate that he has purchased approximately 20 spying devices from multiple vendors. Justin McGee has admitted purchasing and managing the 9 SCS Enterprises' spy cameras that he purchased with the IOTLiving remote management application. Mr. McGee has admitted to having 8 of these spy cameras in his possession. We know that Justin McGee managed the CAMDUCK spy camera with the CIXICM application. Ms. McGee's attorney Peter Currence sent a "Request to Produce" letter to Justin McGee's attorneys Jerry Theos and Marie Louise Ramsdale on Monday, August 14, 2023. This letter was to obtain the spy cameras purchased by Justin McGee and the devices used to manage these cameras. To date, Mr. McGee has not produced the spy cameras or any other spying devices that he purchased.

Technical Evidence as of 11-03-2023

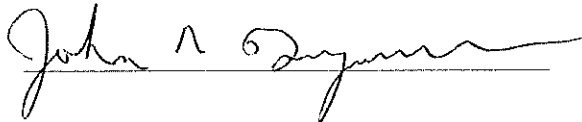
11. To date all the technical evidence obtained to develop this affidavit and my previous ones was obtained solely by the McDougall Self Currence McLeod law firm, who is representing their client Lindsay McGee. There are still multiple outstanding subpoenas related to various alleged intrusions into Ms. McGee's accounts. There are also

representing their client Lindsay McGee. There are still multiple outstanding subpoenas related to various alleged intrusions into Ms. McGee's accounts. There are also outstanding requests to review the data collected by Sean Leonard related to lindsay@mcgee-lawfirm.com email account and to review access logs for various McGee Law Firm M365 accounts. There are also outstanding requests to obtain the spy cameras purchased by Justin McGee and installed in Ms. McGee's private residence from early 2021 to July 2023. This request also includes the devices used by Justin McGee to monitor these spy cameras.

Affidavit Status as of 11-03-2023

12. This second supplemental affidavit was developed based on the recently discovered CAMDUCK spy camera and a review of all previous affidavits created by me. As additional data from several outstanding subpoenas becomes available for analysis another supplemental affiant will be created based on that data.

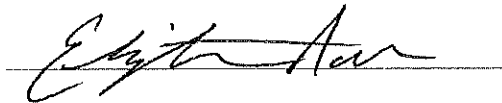
FURTHER THE AFFIANT SAYETH NOT!



John Bumgarner

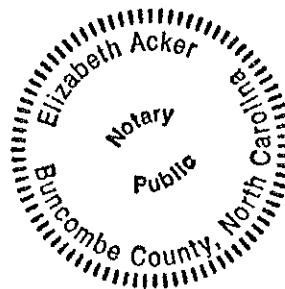
SWORN TO AND SUBSCRIBED BEFORE ME THIS

3, DAY OF 11, 2023.

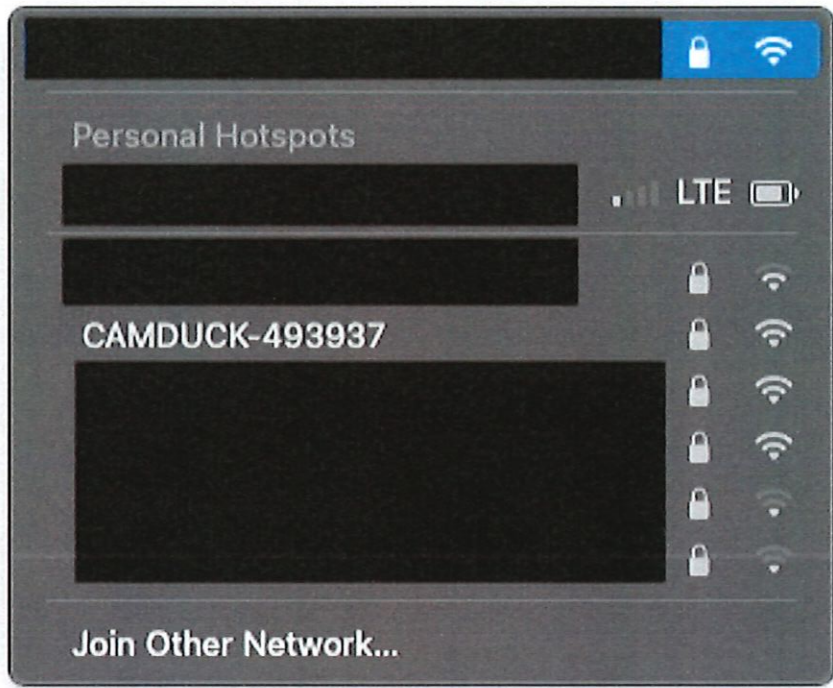


NOTARY PUBLIC FOR NORTH CAROLINA

MY COMMISSION EXPIRES: 08/28/2028









New 5U HD WIFI Surveillance Camera Multi Port USB Charger

★★★★★ 2 reviews

Brand: CAMDUCK

Model: CAMDUCK-5U-BLACK

\$69.99

Color: Black



Quantity:

Quantity input field with value 1

Subtotal: \$69.99



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DESCRIPTION

Our 5U desktop WIFI Surveillance video recorder is a reliable and effective security solution that you can trust to protect your home or business. With the ability to store up to 156 hours of high-quality 1080P video on a 128GB Micro SD card, this camera provides ample storage space for all your video recording needs.

The device can record video continuously or only when it detects motion, giving you complete control over your surveillance footage. Its sleek design, resembling a standard USB charger for smartphones or tablets, allows it to blend in seamlessly into any room with an outlet. You can even charge your smart devices while recording video!

Each video is timestamped with the date and time, making it easy to locate and review footage as needed. With simple plug-and-play functionality, you can easily download your recorded videos directly to a Mac or Windows computer for convenient viewing with your standard media player.

CAMDUCK 5U
 Hidden charge camera
 Dedicated to desktop



HIDDEN HD 1080P WIFI MOTION DETECTION H.264 REMOTE ACCESS

Completely Hidden
No indicator when recording
 No one will know it is a hidden camera



Remote Viewing at Anytime, Anywhere
You can remotely take photo, capture a video and playback
 You also can download files recorded on the TF card to your phone, etc



1080P picture quality
HD picture quality
 Providing more details of light and shadow



Motion Detection
 Sending alarm messages to mobile phones when anomalies are detected



H.264 compression
 At the same image quality
 H.264 compression saves up to 80% memory space



Technical Details



Inventory



5U HD WIFI surveillance camera to your phone

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SPECIFICATIONS

SHIPPING & RETURNS

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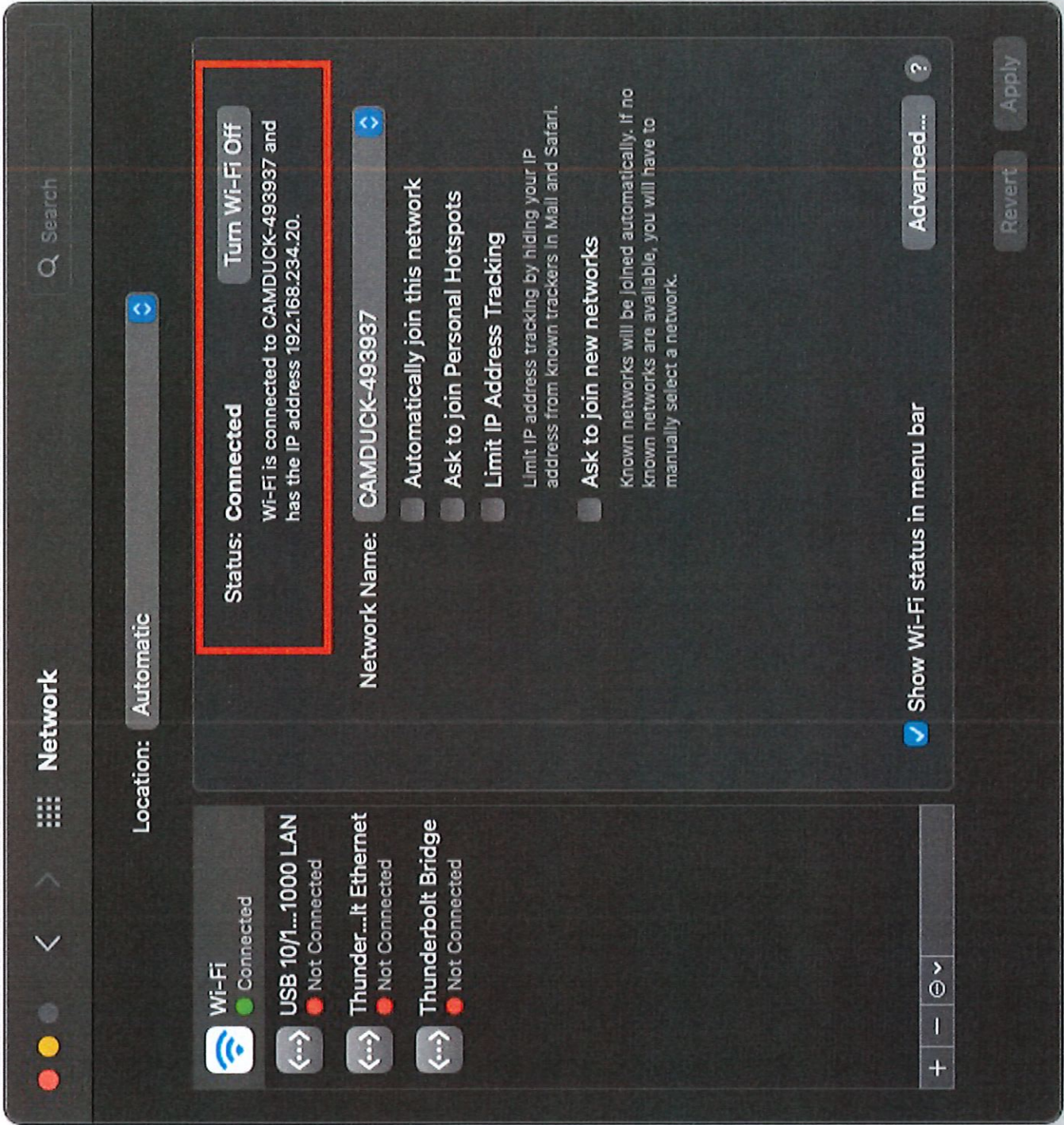
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CAMDUCK HD 4MP WIFI Home Security Camera Dummy Smoke Camera \$89.99 ★★★★★ 2 reviews

CAMDUCK HD 1080p Home Security Ca \$59.99 ★★★★★ 2 reviews









Device [Broadband](#) [Home Network](#) [Voice](#) [Firewall](#) [Diagnostics](#)
[Status](#) **Device List** [System Information](#) [Access Code](#) [Remote Access](#) [Restart Device](#)

Device List

Home Network Devices

Clear and Rescan for Devices

| | |
|---------------------|--|
| MAC Address | 04:7b:cb:3b:75:94 |
| IPv4 Address / Name | 192.168.1.206 / unknown047bcb3b7594 |
| Last Activity | Sat Jul 29 12:05:51 2023 |
| Status | on |
| Allocation | dhcp |
| Connection Type | Wi-Fi  2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 04:7b:cb:64:94:a5 |
| IPv4 Address / Name | 192.168.1.236 / LFM |
| Last Activity | Sat Jul 29 12:06:05 2023 |
| Status | on |
| Allocation | dhcp |
| Connection Type | Ethernet LAN-4 |
| Mesh Client | No |
| IPv6 Address | 2600:1700:6e15:4050:3995:a018:ece4:3107 |
| Type | slaac |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | 2600:1700:6e15:4050:8026:2084:9fb2:73a5 |
| Type | slaac |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | 2600:1700:6e15:4050::49 |
| Type | dhcp |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | fe80::d107:d2bb:a739:dd58 |
| Type | slaac |
| Valid Lifetime | forever |
| Preferred Lifetime | forever |
| MAC Address | 08:12:a5:ce:47:6a |
| Name | unknown0812a5ce476a |
| Last Activity | Mon Jul 24 15:36:30 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 0c:54:15:af:4b:00 |
| Name | LAPTOP-4J617H8E |
| Last Activity | Fri Jun 16 17:12:36 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 0c:8b:7d:e3:4b:0a |
| IPv4 Address / Name | 192.168.1.252 / unknown0c8b7de34b0a |
| Last Activity | Sat Jul 29 12:03:26 2023 |
| Status | on |
| Allocation | static |
| Connection Type | Wi-Fi  5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 0c:8b:7d:f2:ff:54 |

Help

The device list page shows all items of the LAN Host Discovery table. Use the "Clear and Rescan for Devices" button to reset the devices table and do a fresh search for connected LAN devices.

Allocation types include static and dhcp. When the allocation type of a device has not yet been determined, it is marked pending. Devices that are powered off will continue to appear in the table, but be shown as "off" for a period of more than a day.

The Last Activity display will be blank if the WAN is down or the device cannot reach a time server.

IPv4 Address / Name 192.168.1.216 / unknown0c8b7df2ff54
Last Activity Fri Jul 28 21:30:45 2023
Status on
Allocation dhcp
Wi-Fi 
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0c:cf:89:22:5f:47
Name unknown0ccf89225f47
Last Activity Sat Jul 29 06:36:15 2023
Status off
Allocation static
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0c:cf:89:23:be:4c
Name GF-PH130
Last Activity Thu Jul 20 15:25:02 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0c:cf:89:50:51:f8
Name unknown0ccf895051f8
Last Activity Thu Jul 13 17:55:48 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home


Mesh Client **CAMDUCK Spy Camera**


MAC Address 0c:cf:89:a4:02:8a
Name unknown0ccf89a4028a
Last Activity Wed May 31 15:56:47 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0c:cf:89:b1:cb:93
Name unknown0ccf89b1cb93
Last Activity Mon Jun 12 21:46:02 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0c:ee:99:36:34:7d
Name unknown0cee9936347d
Last Activity Thu Jul 20 18:02:57 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 0e:0e:77:ba:8e:e3

| | |
|----------------------------|--|
| Name | unknown0e0e77ba8ee3 |
| Last Activity | Thu Jun 22 08:18:54 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 14:7d:da:00:47:db |
| Name | madisens-Air |
| Last Activity | Tue Jun 6 22:14:33 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 14:94:6c:24:37:60 |
| Name | iPhone |
| Last Activity | Thu Jul 6 10:39:42 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 1c:1b:b5:6b:6a:5c |
| Name | LAPTOP-QJK7J0A1 |
| Last Activity | Sat Jun 10 12:40:13 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 1c:45:86:05:d7:ce |
| Name | unknown1c458605d7ce |
| Last Activity | Sun Jul 16 12:43:31 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Ethernet LAN-2 |
| Mesh Client | No |
| MAC Address | 1e:43:35:70:fa:a3 |
| Name | Iphone-10-X |
| Last Activity | Fri Jul 21 22:27:53 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 2c:64:1f:b5:9f:36 |
| IPv4 Address / Name | 192.168.1.132 / unknown2c641fb59f36 |
| Last Activity | Sat Jul 29 12:03:22 2023 |
| Status | on |
| Allocation | static |
| Connection Type | Wi-Fi  5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 30:7b:c9:26:1c:9c |
| Name | GF-PH130 |
| Last Activity | Tue Jul 4 14:21:58 2023 |

| | |
|---------------------|--|
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 34:73:5a:f6:f5:bf |
| Name | NCGS-LEG-02 |
| Last Activity | Tue Jul 25 17:17:34 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Ethernet LAN-4 |
| Mesh Client | No |
| MAC Address | 38:87:d5:1e:ed:a8 |
| Name | NCGS-LEG-02 |
| Last Activity | Mon Jun 19 20:30:07 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 40:91:51:a6:f7:c8 |
| IPv4 Address / Name | 192.168.1.234 / Pura-F7C8 |
| Last Activity | Sat Jul 29 12:05:27 2023 |
| Status | on |
| Allocation | dhcp |
| Connection Type | Wi-Fi  2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| IPv6 Address | 2600:1700:6e15:4050:: |
| Type | slaac |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | :: |
| Type | slaac |
| Valid Lifetime | forever |
| Preferred Lifetime | forever |
| MAC Address | 42:35:a2:ae:0f:50 |
| Name | Daniels-iPad-2 |
| Last Activity | Sat Jun 24 14:07:21 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 42:cd:7a:d0:b1:eb |
| Name | unknown42cd7ad0b1eb |
| Last Activity | Fri Jun 23 10:11:44 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 4a:29:cd:de:db:b9 |
| Name | unknown4a29cddedbb9 |
| Last Activity | Thu Jun 29 10:08:39 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz |

Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 4a:55:55:e3:56:45
Name unknown4a5555e35645
Last Activity Sat Jun 10 13:31:58 2023
Status off
Allocation dhcp
Wi-Fi
2.4 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 4c:03:4f:5b:9f:fa
Name NVTUS-7LX67M3
Last Activity Wed Jul 12 21:06:32 2023
Status off
Allocation dhcp
Wi-Fi
5 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 4c:3b:df:31:db:1a
Name XBOX
Last Activity Tue Jul 25 23:35:46 2023
Status off
Allocation dhcp
Wi-Fi
5 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 54:ef:33:45:d4:b0
Name unknown54ef3345d4b0
Last Activity Mon Jul 10 15:53:07 2023
Status off
Allocation dhcp
Wi-Fi
2.4 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 54:f1:5f:e6:9e:3e
Name unknown54f15fe69e3e
Last Activity Tue Jul 11 10:54:16 2023
Status off
Allocation dhcp
Wi-Fi
2.4 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 5c:47:5e:09:2a:94
IPv4 Address / Name 192.168.1.235 / RingDoorbell-94
Last Activity Sat Jul 29 12:05:14 2023
Status on
Allocation dhcp
Wi-Fi 
2.4 GHz
Connection Type Type: Home
Name: ATTGRYhNQs

Mesh Client No

MAC Address 64:ff:0a:cb:a6:91
Name unknown64ff0acba691
Last Activity Mon Jun 5 07:13:32 2023
Status off
Allocation dhcp
Connection Type Wi-Fi
2.4 GHz

Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 66:36:02:c2:46:f9
IPv4 Address / Name 192.168.1.226 / unknown663602c246f9
Last Activity Sat Jul 29 12:05:24 2023
Status on
Allocation dhcp
Wi-Fi 
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 66:37:76:3d:bb:f8
Name unknown6637763dbbf8
Last Activity Wed May 31 14:16:05 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 6e:65:2f:34:14:fb
Name unknown6e652f3414fb
Last Activity Thu Jul 20 23:26:04 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 70:ef:00:be:a5:15
Name iPhone
Last Activity Sat Jul 8 21:17:33 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 7a:2b:c1:bd:9a:77
Name iPhone
Last Activity Sun Jul 9 11:50:39 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 80:45:dd:a6:6b:89
Name TABLET-6NJ3LR5L
Last Activity Fri Jul 14 05:22:36 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs

Mesh Client
No

MAC Address 80:e6:50:03:e5:12
Name Bonnies-MBP
Last Activity Tue Jul 18 23:27:57 2023
Status off
Allocation dhcp
Connection Type Wi-Fi
5 GHz

| | |
|------------------------|--|
| | Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 82:99:27:da:6a:2b |
| Name | iPhone |
| Last Activity | Wed Jul 5 08:26:14 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 84:a6:c8:34:0b:d4 |
| Name | HP |
| Last Activity | Fri Jul 28 14:31:53 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 86:05:fd:9b:17:e0 |
| Name | unknown8605fd9b17e0 |
| Last Activity | Tue Jul 18 07:54:21 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 8a:97:45:e0:2b:9d |
| Name | Dans-iPhone |
| Last Activity | Mon Jun 12 14:38:41 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 8e:e1:0b:7c:eb:81 |
| Name | Charlies-iPad |
| Last Activity | Mon Jun 26 13:10:07 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 92:1b:cf:0b:b0:71 |
| Name | unknown921bcf0bb071 |
| Last Activity | Wed Jul 26 11:48:20 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | 94:db:56:fe:35:1f |
| Name | unknown94db56fe351f |
| Last Activity | Mon Jun 5 07:14:40 2023 |
| Status | off |
| Allocation | pending |
| Connection Type | Ethernet LAN-3 |
| Mesh Client | No |

MAC Address 96:c4:b6:ca:81:a2
Name unknown96c4b6ca81a2
Last Activity Mon Jun 26 12:39:31 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address a0:9f:10:32:e8:5f
Name GF-PH130
Last Activity Tue Jul 4 14:21:15 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address a0:9f:10:33:52:24
Name GF-PH130
Last Activity Fri Jul 7 18:43:54 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address a0:9f:10:3c:30:18
Name GF-PH130
Last Activity Tue Jul 4 14:21:58 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address a0:9f:10:6f:15:a0
Name GF-PH130
Last Activity Tue Jul 4 14:21:58 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No


MAC Address a2:a6:31:de:c2:27
Name iPhone
Last Activity Mon Jun 26 16:42:37 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No


MAC Address ae:5c:1e:ee:ed:d0
Name unknownae5c1eeedd0
Last Activity Wed Jul 5 22:19:07 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address ae:62:9e:fd:f8:85
Name unknownae629efd885
Last Activity Mon Jun 26 16:41:54 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address ae:cd:74:a8:9f:1b
Name unknownaec74a89f1b
Last Activity Thu Jul 13 12:25:53 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address ae:e5:bd:cd:9f:38
Name unknownaee5bdcd9f38
Last Activity Wed Jul 26 11:47:20 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 2.4 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No


MAC Address bc:09:1b:fe:80:0d
IPv4 Address / Name 192.168.1.228 / LFM
Last Activity Sat Jul 29 12:03:46 2023
Status on
Allocation dhcp
Wi-Fi 
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No
IPv6 Address 2600:1700:6e15:4050:d117:5830:e037:98f2
Type slaac
Valid Lifetime 2592000s
Preferred Lifetime 604800s
IPv6 Address 2600:1700:6e15:4050:a002:7ab4:ba23:5f69
Type slaac
Valid Lifetime 2592000s
Preferred Lifetime 604800s
IPv6 Address 2600:1700:6e15:4050::43
Type dhcp
Valid Lifetime 2592000s
Preferred Lifetime 604800s
IPv6 Address fe80::52bb:c2b9:6282:a67
Type slaac
Valid Lifetime forever
Preferred Lifetime forever

MAC Address bc:9e:bb:bf:a9:6d
IPv4 Address / Name 192.168.1.232 / unknownbc9ebbf96d
Last Activity Sat Jul 29 12:03:34 2023
Status on
Allocation dhcp
Wi-Fi 
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address bc:ce:25:f9:2a:95
Name unknownbcce25f92a95
Last Activity Fri Jul 21 17:53:02 2023

| | |
|---------------------|--|
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | c4:ac:59:a0:d0:8d |
| Name | Canona25f2c |
| Last Activity | Thu Jul 20 15:25:19 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | da:26:8d:89:89:08 |
| Name | iPhone |
| Last Activity | Sat Jul 1 20:20:06 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | da:e8:85:d9:9d:6a |
| Name | McGees-iPhone |
| Last Activity | Mon Jun 12 20:10:23 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | e8:a7:30:37:06:7c |
| Name | iPhone |
| Last Activity | Sat Jul 1 19:32:18 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | e8:d8:d1:bd:16:b0 |
| Name | Lindsay-PC |
| Last Activity | Sat Jul 8 15:59:16 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Ethernet LAN-4 |
| Mesh Client | No |
| MAC Address | ea:5d:27:39:c3:17 |
| Name | Justlins-iPhone |
| Last Activity | Sat Jul 8 21:05:10 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| MAC Address | f0:6e:0b:c6:c5:9c |
| IPv4 Address / Name | 192.168.1.146 / LFM |
| Last Activity | Sat Jul 29 12:05:20 2023 |
| Status | on |
| Allocation | dhcp |

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| | |
|---------------------------|--|
| Connection Type | Wi-Fi  5 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |
| IPv6 Address | 2600:1700:6e15:4050:3c78:781:170e:99e3 |
| Type | slaac |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | 2600:1700:6e15:4050::40 |
| Type | dhcp |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | 2600:1700:6e15:4050:1c04:948:16fc:6f85 |
| Type | slaac |
| Valid Lifetime | 2592000s |
| Preferred Lifetime | 604800s |
| IPv6 Address | fe80::5549:7046:7b4c:30e0 |
| Type | slaac |
| Valid Lifetime | forever |
| Preferred Lifetime | forever |
| MAC Address | f2:86:b4:0b:25:4a |
| Name | unknownf286b40b254a |
| Last Activity | Wed Jul 26 11:52:26 2023 |
| Status | off |
| Allocation | dhcp |
| Connection Type | Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs |
| Mesh Client | No |

**SECOND SUPPLEMENTAL
AFFIDAVIT OF
STEVEN MARC ABRAMS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Family Court

Family Court Case No. 2022-DR-10-3072

Appellate Case No.

Lindsay F. McGee,

Petitioner,

v.

Justin McGee,

Respondent.

SECOND SUPPLEMENTAL AFFIDAVIT
OF STEVEN MARC ABRAMS, J.D., M.S.

PERSONALLY APPEARED BEFORE ME, the undersigned, who, being duly sworn, deposes and states the following:

Background

1. My Name is Steven Marc Abrams. I am a licensed Attorney and Counselor at Law, in good standing, in South Carolina, Washington, DC, and New York. I am a member of the South Carolina Bar, The Washington DC Bar, The New York State Bar Association, and the New York State Academy of Trial Lawyers. My office address is 1154 Holly Bend Drive, Mount Pleasant, South Carolina 29466. My office phone number is (843) 813-1996. My full credentials are included in my CV which is

appended to this my first affidavit in support of Petitioner's Motion to Suppress. This affidavit is my second supplementary affidavit filed in this matter.

Audio/Video Bugging Device Found in Bedside Cabinet of Petitioner

2. Since filing my supplementary affidavit in this matter before the South Carolina Court of Appeals additional new information has come to light. On November 1, 2023, Petitioner brought me a device which she found at her home in the bedside cabinet next to her bed. This device appears at first glance to be a 5 port USB hub. Upon closer inspection the device has a clear access port for a camera and a hole for a microphone port on the front of the device. The back of the device has a removable panel which covers a Micro SD card slot. (See Figure 1). There was a 32 GB Micro SD card installed in the device at the time it was delivered to me.
3. The device used the Microsoft FAT 32 file system and had a volume serial number of 627A6748.
4. I maintained a chain of custody over this evidence from Petitioner to me, and from me to Mr. John Bumgarner, who performed additional analysis of this evidence.

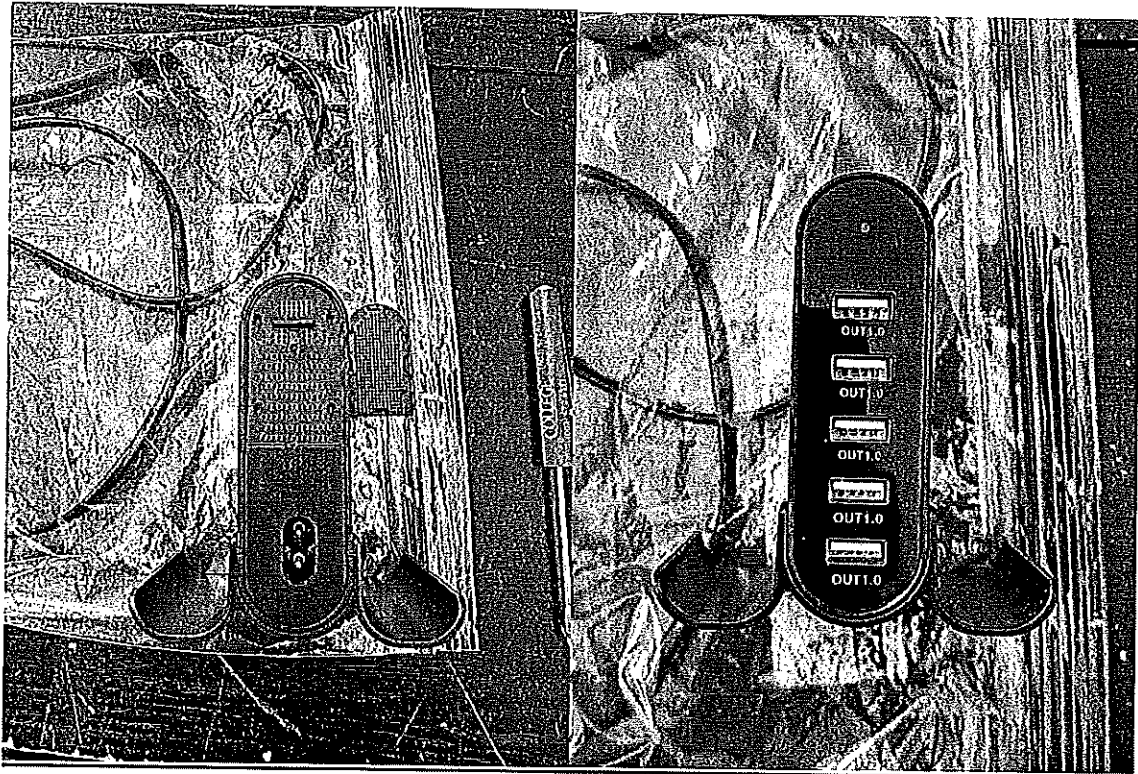


Figure 1. Rear and Front view of the USB hub spy camera found by Petitioner

5. Using FTK forensic Imager I made a forensic image of the 32 GB SD card found within the USB hub. I then used Magnet Forensics AXIOM software suite to analyze the data contained on the SD card. The data contained 4,966 JPG still images and 4,960 MP4 videos (each 10 minutes in length) recorded by the spy camera. Video was found that was recorded on 5/15/2022, 6/30/2022, 7/16-7/18/2022, and 8/24 – 10/3/2022.
6. These videos contained images and sound recordings. Because the spy camera was hidden inside of a cabinet with doors on the front, most of the video is an all black frame, and the audio is distorted. However, when the doors of the cabinet are opened the video reveals the inside of Petitioner's bedroom and part of her bed. One can see

and hear petitioner in her bed, and in at least one video Petitioner was speaking on the phone from her bed and both she and the person she was speaking to could be heard clearly in the recording from the SD card. In other videos Petitioner can be heard from her bedroom and beyond in her home.



Figure 2. Sample of view seen by the USB hub spy camera when doors of cabinet are opened.

7. Much of the material seen in the videos is highly personal and includes nudity and other material to be expected in one's bedroom. None of the material depicted in these videos is something that a reasonable person would want disclosed to the rest of the world. The material Petitioner is overheard speaking about on the phone throughout these videos is also not something that she intended to share with the rest of the world.

Opinions

8. While we had surmised, based on the number of audio capable spy camera devices known to have been purchased by Respondent, that some of the devices which Respondent secreted in Petitioner's home must have been able to record audio, this

is the first direct evidence of Respondent's use of audio eavesdropping devices to record Petitioner without her knowledge or consent.

FURTHER THE AFFIANT SAYETH NOT!

Steven M. Abrams

Steven Marc Abrams, J.D., M.S.

SWORN TO AND SUBSCRIBED BEFORE ME THIS

2nd, DAY OF *November*, 2023.

Almontra J. Maierle

NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: *March 18, 2024*

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Nov 03 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM CHARLESTON COUNTY
Family Court

Case No. 2022-DR-10-3072

Justin McGee,Respondent

v.

Lindsay McGee,Petitioner

PROOF OF SERVICE

I certify that I have served the MOTION TO SUPPLEMENT THE RECORD on
Respondent, by email addressed below:

Mr. Jerry N. Theos
jerry@theoslaw.com

Ms. Marie-Louise Ramsdale
ml@ramsdalelaw.com

Ms. Elizabeth J. Stringer
liz@stringerlaw.us

Mr. Matthew Abee
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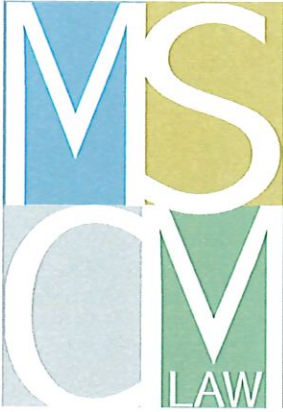


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November 3, 2023



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November 3, 2023

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Nov 03 2023

SC Court of Appeals

VIA EMAIL ONLY

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

RE: Justin McGee v Lindsay McGee
Case #. 2022-DR-10-3072
Appellate Case #2023-001376

Dear Ms. Kitchings:

Enclosed please find the MOTION TO SUPPLEMENT THE RECORD in regard to the above referenced matter. Please file and return a filed stamped copy to me.

Thank you for your assistance in regard to the above.

With kind regards.

Sincerely,

PETER G. CURRENCE

PGC:lr

Enclosures

cc: Lindsay McGee (via email only)
Jerry Theos (via email only)
Marie-Louise Ramsdale (via email only)
Elizabeth Stringer (via email only)
Matthew Abee (via email only)
Morgan Spires (via email only)
Richard G. Whiting (via email only)

Reply to Columbia Office | jom@mscmlaw.com | www.mscmlaw.com