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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.

REPLY TO RETURN TO PETITIONER'S MOTION TO SUPPLEMENT THE RECORD

Petitioner Lindsay McGee, subject to her Motion to Strike, filed at the same time as this Reply, responds to Respondent's *Return to Petitioner's Motion to Supplement the Record* filed November 13, 2023. Respondent's arguments are not credible, and he once again does not provide any evidence to corroborate or support his baseless assertions.

As to Respondent's first argument that he purchased the CAMDUCK USB tower "for work"¹, he fails to disclose, or provide documentation to reflect, when and from whom he purchased the device. (Return p. 4) Respondent claims that he "first noticed the CAMDUCK had been removed from the law firm around August 20-24, 2022" but he offers no evidence to support

¹ This establishes that Respondent was likely recording Petitioner at the McGee Law Firm and potentially intercepting her communications with clients who did not know they were being recorded. It also raises concerns about the potential interception of privileged communications between opposing counsel and their clients who participated in depositions and mediations at the McGee Law Firm.

this statement (Respondent Aff. ¶ 4). In fact, the CAMDUCK was plugged in and recorded in Petitioner's residence on August 24, 2022 at which time Respondent would have had remote access to view the content to determine not only when the device was removed but also who removed it. This is yet another example of Respondent having the evidence to support a claim but refusing to produce it.

Respondent provided the CAMDUCK to Petitioner most likely in January 2022, as Petitioner now knows that is the date of the first recordings. (Bumgarner Aff. ¶ 16; Petitioner Aff. ¶ 18). Respondent initially placed the device on her dresser, however, Petitioner informed Respondent that she moved it inside her bedside table where it could not be seen. (Petitioner Aff. ¶4). Respondent arbitrarily and falsely asserts that other individuals could have placed the device in Petitioner's bedroom because she allowed "many other individuals unfettered access to the McCutchen House." (Return p. 2). This is unsubstantiated and patently false because Petitioner has allowed no one access to the McCutchen House when she was not present, other than Respondent. (Petitioner Aff. ¶ 17). Petitioner is informed and believes that Respondent orchestrated the email attached as Exhibit A, which is the subject of her Motion to Strike, and asserts that each and every vile and disgusting statement contained in the Affidavit is false. Further, Respondent failed to provide the email header information which would make it possible to identify the sender.

Although the CAMDUCK is in Petitioner's possession, it was connected to the WiFi network in Petitioner's home and Respondent most probably has recordings in his possession, so he is well-aware of the contents of the recordings. (Bumgarner Aff. ¶¶ 13, 17). Petitioner has established that Respondent introduced the CAMDUCK in the McCutchen House.² Respondent

² Respondent inaccurately states that it is alleged that he placed the device in Petitioner's bedside table. Petitioner alleges that Respondent placed the device to be used as a charging station on top of a dresser where it would have

admitted that he purchased the CAMDUCK. (Return p. 1). Data from the CAMDUCK was being transmitted via Petitioner's home WiFi network, however, Petitioner was unaware that this was a recording device and did not download the management software on her iPhone to enable her to retrieve data from the CAMDUCK. (Petitioner Aff. ¶ 17). On the other hand, Respondent has failed to produce his electronic device(s), or data from his electronic device(s), that he used to monitor the CAMDUCK to corroborate his claims that he has "not reviewed the recordings on the CAMDUCK camera referenced in Wife's Motion." (Respondent Aff. ¶ 7).

As to Respondent's claim that the CAMDUCK is not newly discovered evidence, Wife unplugged the CAMDUCK in October 2022 and left it in the back of the cabinet. (Petitioner Aff. ¶¶ 7, 8). The CAMDUCK was plugged in and powered on to capture video from the date Respondent introduced the device into the McCutchen House³ until October 3, 2022, when Petitioner unplugged it. Therefore, CAMDUCK was "able to capture audio and video recordings from May 15, 2022; June 30, 2022; July 16-18, 2022; and August 24 through October 3, 2022." (Return p. 3; Mot to Suppl. R. at 4).

On the other hand, Respondent mistakenly assumes that the CAMDUCK would have been discovered during the extensive search by Lofton Investigative Solutions, LLC on July 25, 2023. (Return p. 4). Because the CAMDUCK had been unplugged since October 3, 2022, it was not transmitting a signal and therefore was undetectable during the sweep. (Bumgarner Aff. ¶ 15). Consequently, Respondent's claim that "the CAMDUCK was placed in Wife's cabinet after July 25, 2023, to appear as though it is newly discovered evidence", is untrue. Moreover, and even

had an unobstructed view of her bedroom and bathroom. Petitioner thought the device was unattractive, but was useful as a charging station, so she put it inside the cabinet where she could simply run the charging cords out the back and up to the top of the cabinet where she could plug in her devices.

³ Petitioner asserts that Respondent brought her "electronic devices" over a period of time and agrees that early 2022 is the more likely date this device was installed in her house based upon Mr. Bumgarner's determination. Bumgarner believes that the recordings began in January 2022 (Petitioner Aff. ¶5), although it could have been purchased in January 2021.

more compelling, is the fact that not only did the CAMDUCK connect to the WiFi network at the McCutcheon House on May 15, 2022, but also the audio and video log files on the CAMDUCK contain audio and video recordings of Petitioner from January through October 3, 2022. (Bumgarner Aff. ¶ 11, 12) There is no “he-said-she-said conundrum” and the family court does not need to assess the credibility of the parties and their witnesses (Return p. 4 because there is conclusive technical data which disproves Respondent’s claims.

Ironically, the only evidence which could exonerate Respondent, and which is in his possession, is 1) the audio/video recording devices (with original SD cards) identified on the router logs in the McCutchen House, 2) Respondent’s electronic devices he used to monitor those thirteen devices, and 3) the purchase information for each device. However, Respondent has refused to produce this information in response to formal discovery requests in the family court case and he has not offered it as evidence to this court to corroborate claims in his Returns or in support of his defense.

Respondent’s third defense also misses the mark when he suggests that Petitioner concedes that she fails to establish a claim under the Homeland Security Act when she “acknowledges that the device...found in her garage . . . had no audio capability. (Return p. 4). This is a monumental misstatement by Respondent which takes Petitioner’s explanation completely out of context by intentionally omitting not only language in the sentence to purposefully change the meaning of Petitioner’s explanation, but also omitting the remaining language in the paragraph, both of which unquestionably establish a claim under the Homeland Security Act. For clarification, the complete explanation in Petitioner’s Motion to Supplement the Record is written as follows

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 (emphasis added) found in her garage was likely purchased from SCS through Amazon and (Emphasis added) 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 Affidavit ¶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. (Mot. to Suppl. At 3). (emphasis added)

Respondent's assertion that Petitioner conceded that she failed to establish a claim under the Homeland Security Act is a blatant misstatement. For clarification, when Petitioner identified SCS Enterprises as the manufacturer of the camera she found in the garage, she issued a subpoena to SCS Enterprises. The responsive documents disclosed the purchase of five cameras for which Respondent paid extra to have audio capability. (Bumgarner Aff. ¶ 5) In Respondent's Return, Respondent disclosed the purchase of four additional cameras from Amazon also manufactured by SCS Enterprises that did not have audio capability but were otherwise identical to the five cameras he purchased directly from SCS. (Bumgarner Aff. ¶ 5, 8). During the time Steve Abrams examined the camera Petitioner found in her garage, Mr. Abrams found video, but the sound was only static. (Abram's Aff. Aug. 23, 2023). Knowing that Respondent purchased five of these cameras with audio camera from SCS, and being unaware that Respondent purchased the four SCS cameras without audio from Amazon, Mr. Abrams reasonably and logically assumed that the camera had audio, but that he did not have compatible software to unencrypt the audio.

Respondent's conclusion that Petitioner's "theories to date have not held up to Husband's responsive briefing and affidavits, so she is pivoting to a new theory..." is nonsensical. Petitioner has not theorized about anything because the data does not lie. On July 22, 2023, John Bumgarner accessed the Smart Home Manager at Petitioner's home and informed Petitioner that there were

thirteen recording devices at the McCutchen House. (Bumgarner Aff. ¶ 9). Later that evening, Petitioner found a spy camera that was initially placed in the garage of her house labeled WF-113 (GF-PH130 is the default name) that is manufactured by SCS Enterprises. (Amended Mot to Supp. ¶¶ 12-15). The evidence reflects that Respondent purchased nine WF-113 spy cameras from SCS Enterprises; four without audio that were purchased through Amazon and five with audio that were purchased directly from SCS Enterprises. (Bumgarner Aff. ¶ 5) The Smart Home Manager indicates seven unique devices of the same nomenclature, GF-PH130, had previously connected to the Smart Home Manager at the McCutchen House. (Bumgarner Aff. ¶ 8). It is axiomatic that, based upon Respondent's purchases of the WF-113 (GF-PH130) spy cameras, at least three of those devices had audio. (Bumgarner Aff. ¶ 8).

Respondent's accusations of ever-shifting strategies and efforts to delay the family court actions are simply distractions. (Return p. 4). It was Respondent's conduct that necessitated the filing of this motion and Petitioner has no incentive to delay the family court case. 9Petitioner's Aff. ¶ 9). In fact, Petitioner is anxious to file a motion to compel Respondent to produce the spy camera recording devices with original SD cards, purchase information, and his electronic devices used to monitor the spy cameras which respondent so zealously refuses to provide. In reality, the delay in this Court of Appeals action is a result of Respondent's implausible and unsupported denials that he has violated the Homeland Security Act, in spite of his admissions to purchasing the nine SCS WF-113 (GF-PH130) spy cameras and installing spy cameras in Petitioner's home, when three of the SCS WF-113 (GF-PH130) spy cameras unquestionably had audio capability.

If Respondent would simply provide this court with the original cameras, the purchase information, and the iPhones and iPads he used to access data from these devices, then this matter would be resolved, and the case remanded back to the family court.

Conclusion

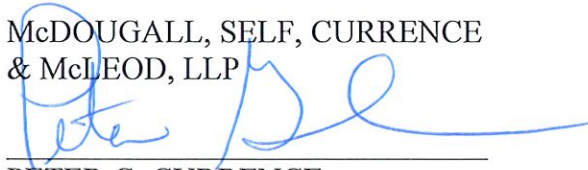
By Respondent's own admission, he has been purchasing spy cameras since 2013. Undeniable evidence shows that Respondent purchased at least twenty audio/video audio/video spy cameras since January 2021. (Bumgarner Aff. ¶ 5). Respondent admits to putting spy cameras in the McCutchen House (Respondent's Return to Mot. to Supp. P. 2). and thirteen audio/video spy cameras had historically connected to the WiFi in the McCutchen House. (Bumgarner Aff. ¶ 9). Three of those devices purchased by Respondent definitively had audio capability (Bumgarner Aff. ¶ 8), and a fourth audio/video spy camera with audio capability, admittedly purchased by Respondent and connected to the WiFi, has now been found. (Bumgarner Aff. ¶ 5).

Respondent's outlandish explanation that he did not place the CAMDUCK in Petitioner's house but noticed the CAMDUCK missing from his office around August 20-24, 2022 is dispelled by audio and video log files on the CAMDUCK dating back almost eight months to January, February and March 2022. (Bumgarner Aff. ¶¶ 11, 16) Respondent has thus far refused to produce the audio/video recording devices that he admittedly purchased along with the original SD cards that were in Petitioner's residence and refused to produce his electronic devices which he used to access these recording devices, although that is potentially the only information that could exonerate him.

Respondent's persistent refusal to divulge this information, which would exonerate him, suggests that disclosing the spy cameras with original SD cards, the purchase information, and his iPhone and iPad would further and conclusively establish his culpability. Petitioner requests that this court draw an adverse inference and find that information would establish Respondent has intercepted Petitioner's private communications in violation of the Homeland Security Act and grant the relief requested in her Motion to Suppress Evidence.

Respectfully submitted,

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November 20, 2023.

**THIRD SUPPLEMENTAL AFFIDAVIT
OF JOHN BUMGARNER**

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. This third supplemental affidavit is related to the Respondents' Return filed on Monday, November 13, 2023. That Return was linked to the new surveillance camera evidence that was discovered on Monday, November 01, 2023 and discussed in my second supplemental affidavit. This third supplemental affidavit will also include information that was previously stated in my other three affidavits related to Family Court Case No. 2022-DR-10-3072.

Hidden Surveillance Camera Usage

4. The Respondent has admitted to using surveillance cameras since at least 2013. (McGee Aff. ¶ 57; Return p. 12) The Respondent also admitted to using these spying devices to monitor activities at his law office in South Carolina, in his personal camper, his personal house on Eddy Farm Road and at his estranged wife's residence. (McGee Aff. ¶ 57; Return p. 12) Ms. McGee has verbally confirmed on several occasions that she was never informed by Justin McGee that her private residence was under twenty-four hours a day, seven days a week covert surveillance by him. Additionally, she has stated that she did not know that her law office was also under the same covert surveillance when she was meeting with her clients and with other attorneys representing their own clients during mediations.

Hidden Surveillance Camera Purchases

5. The Respondent has admitted to purchasing covert surveillance cameras from Amazon, Deluxe CCTV, Know Your Nanny and SCS Enterprises. (McGee Aff. ¶ 65 Return p. 13 and 73-74; Return p. 15) There is direct evidence that shows that Justin McGee purchased four WF-113 spy cameras manufactured by SCS Enterprises from Amazon in 2021 without audio capabilities. (Exhibit A) There is direct evidence showing that Justin McGee purchased five WF-113 spy cameras directly from SCS Enterprises in 2022 that had audio recording capabilities. (Exhibit B) There is direct evidence obtained from PayPal that shows that Justin McGee purchased surveillance cameras from Deluxe

CCTV and Know Your Nanny in 2022. (Exhibit C) There is also direct evidence that Justin McGee purchased surveillance equipment from BigSecurity, The Home Security Superstore, The Spy Store, Spy Associates and Zetronix in 2021. (Exhibit D, Exhibit E and Exhibit F) There are also purchases in 2021 from BestBuy and B&H Photo that could likely be surveillance equipment. (Exhibit G and Exhibit F) The Respondent stated that he purchased the CamDuck covert surveillance camera device that was discovered on November 01, 2023, inside Lindsay McGee's bedside nightstand. None of the Respondent's purchased records obtained through subpoenas indicated the date that the CamDuck covert surveillance camera was purchased. The Respondent failed to provide a receipt for that purchase in his Return filed on Monday, November 13, 2023. Based on the Respondent's purchase history in my possession there were approximately twenty covert surveillance devices that he started acquiring after Lindsay McGee separated from him in February 2021. Additional subpoenas will be required to obtain the exact specifications and capabilities of all the surveillance equipment that the Respondent purchased over nearly a three year period.

Hidden Surveillance Cameras in router logs from Ms. McGee's Residence

6. Lindsay McGee believed that her estranged husband Justin McGee might have installed listening devices in her residence. On Thursday, July 20, 2023, Ms. McGee gave Peter Currence verbal authorization for me to access her AT&T Smart Home Manager application. Subsequently, Peter Currence gave me written permission at 17:14 EDT to access her Smart Home Manager. This application is used to manage and monitor access to the Wi-Fi network within her private residence.
7. On Friday, July 21, 2023, at 17:17 EDT I was provided with the login credentials to access the Smart Home Manager application associated with her home Wi-Fi network. A preliminary review of the Smart Home Manager, which manages an Arris BGW210-700 (DSL modem) indicated that there were eight connected Wi-Fi capability devices in her residence. These devices included multiple televisions, a personal computer, a Nintendo Switch and other Internet of Things (IoT) devices, such as a Pura air freshener. On Saturday, July 22, 2023 at approximately 09:00 EDT, I accessed her Smart Home Manager to conduct a detailed review of the historical devices that had previously connected to her Wi-Fi network using valid credentials, which are the Service Set Identifier (SSID) and the associated password. These credentials must be entered on any electronic devices to connect to the Wi-Fi network in Lindsay McGee's private residence. These credentials do not have to be reentered on subsequent connections on the same network.

8. The detailed review of the historical devices connected to her Wi-Fi network indicated that seven unique devices named GF-PH130 had been previously connected. (Exhibit H) Based on data obtained via a subpoena we now know that GF-PH130 is the default name used by the WF-113 covert surveillance camera sold by SCS Enterprises. Direct evidence shows that Justin McGee purchased nine WF-113 covert surveillance cameras. (Exhibit A and Exhibit B) This evidence indicated that five of the nine WF-113 covert surveillance cameras had audio capabilities. Based on the purchase history records, the Smart Home Manager logs and the router logs we know beyond a shadow of a doubt that at least three of the seven GF-PH130 devices that were once in Lindsay's McGee home contained audio recording capabilities. The Respondent has admitted to purchasing and installing covert surveillance cameras in Lindsay McGee's private residence. (Respondent's Return to Mot. to Supp. P. 2)
9. The Smart Home Manager and the router logs for Ms. McGee's internet service indicate that there were at least six other devices that used Wi-Fi components similar to those used in the spy cameras manufactured by SCS Enterprises. Based on this direct evidence we know that there were at least thirteen unique covert surveillance cameras installed in Lindsay's McGee's private residence and we can make an axiomatic argument that at least four of these devices had audio recording capabilities.
10. Sean Leonard the Respondent's technical expert has called into question the reliability of the router logs as evidence based on several erroneous "last activity" date stamps (Leonard Aff. ¶ 22.) related to specific devices unrelated to the spy cameras. I have also questioned how these dates are generated by the Arris BGW210-700 router. We are actively doing research to determine how these dates are created by the router. Sean Leonard has unequivocally confirmed that the router logs are highly accurate as a method to identify devices that have accessed Ms. McGee home network. (Leonard Aff. ¶ 22.) Based on Sean Leonard's affidavit we can confirm with great confidence that all the devices listed in the router logs have been on Ms. McGee home network. These devices include the thirteen unique covert surveillance cameras identified by their names and their Wi-Fi components. (Exhibit H, Exhibit I and Exhibit JI) We also know that at least four of these thirteen spy cameras had audio recording capabilities. These four cameras include three purchased by Justin McGee in 2022 from SCS Enterprises and 1 CAMDUCK-5U-BLACK spy camera, which contains 4,960 MP4 videos with audio tracks. The deletion log of the CAMDUCK camera has over 10,000 deleted videos with audio tracks.

Respondent indicates that cameras were removed from McCutchen residence in 2022

11. Justin McGee states that he removed these spy cameras from Ms. McGee's private residence in the Summer of 2022. (McGee Aff. ¶¶ 62, 63; Return p. 3). This statement is false because two covert surveillance cameras were found in his estranged wife's residence in 2023. On Saturday, July 22, 2023, a spy camera was discovered in the garage of Lindsay McGee's home. This camera was purchased by Justin McGee in July 2021 and has likely been installed in his estranged wife's residence without her consent since at least the summer of 2021. Another spy camera (CAMDUCK-5U-BLACK) was discovered on Wednesday, November 01, 2023, inside Ms. McGee's bedside nightstand. Justin McGee has admitted to purchasing this camera, but he provided no purchase record for this camera with his Return filed on Monday, November 13, 2023. (McGee Aff. ¶ 3; Return p. 1) The CAMDUCK spy camera had audio recording capabilities. Based on the files on the camera we know that this camera was actively recording within Ms. McGee's bedroom starting in early 2022 and until October 3, 2022, which is the date of the last recordings.

Respondent states that the CAMDUCK spy camera was missing from his law office in 2022

12. Justin McGee stated that he purchased the CAMDUCK-5U-BLACK spy camera to monitor his law office in South Carolina and that he noticed that the device was missing around August 20-24, 2022. (McGee Aff. ¶ 4; Return p. 1) These statements are false. There are audio files on the CAMDUCK that were recorded months before August 2022 in his estranged wife's private bedroom. Justin McGee failed to provide a purchase record for this CAMDUCK spy camera in his Return filed on Monday, November 13, 2023. Without this purchase receipt, we cannot determine with accuracy when Justin McGee placed this camera in Ms. McGee's bedroom. The current evidence indicates that the camera was placed in Ms. McGee's home in early 2022 and that it recorded sensitive telephone conversations and intimate moments in her bedroom without her knowledge or consent until October 3, 2022, which is the date of the last recordings.

CAMDUCK in the router logs

13. The Respondent states that I claim that the "newly discovered" CAMDUCK has this same MAC (Media Access Control) address as one previously identified by me in the Arris BGW210-700 device log files. (Respondent's Return to Mot. to Supp. P. 3) In my original affidavit dated Tuesday, August 29, 2023, I stated in my previous affidavits that there were multiple unknown devices that used Wi-Fi components similar to those used in the covert surveillance cameras sold by SCS Enterprises. I determined that these unknown devices were covert surveillance cameras based solely on the device names

and their Wi-Fi components. One of the previously unknown devices has now been identified as the CAMDUCK-5U-BLACK spy camera, which was discovered in Lindsay McGee's home on Wednesday, November 01, 2023. I analyzed this spy camera on Thursday, November 02, 2023. During this analysis, I was able to conclusively match the CAMDUCK's MAC address to one that linked to a previously unknown spying device listed in the device log files obtained on Saturday, July 29, 2023, from the Arris BGW210-700 router at Ms. McGee's private residence. (Exhibit J and Exhibit K) There is indisputable evidence that the CAMDUCK spy camera purchased by Justin McGee had been connected to the private Wi-Fi network in Ms. McGee's home. There is also indisputable evidence that the MAC address of the CAMDUCK camera matches a device listed in the router log file for Ms. McGee's Wi-Fi network. The only way for the CAMDUCK to be listed in these logs is for someone to have connected the device to the network with a valid password using the CAMDUCK's management application, which is commonly installed on a mobile phone. This management application also allows the CAMDUCK covert spy camera to be monitored remotely. Based on the CAMDUCK's purchase history and the router logs evidence we can make a logical argument that Justin McGee was the individual that installed this spying device in Lindsay McGee bedroom and was the person that was monitoring the camera without his estranged wife's consent. To date the Respondent still has not relinquished his mobile phones or tablets, which would allow us to determine how Justin McGee managed the thirteen covert surveillance cameras listed in the router logs, including the CAMDUCK.

CAMDUCK Wi-Fi Broadcasting

14. The Respondent states that the CAMDUCK spy camera would have been broadcasting its name CAMDUCK-493937 in the available Wi-Fi networks in Lindsay McGee's home. (Respondent's Return to Mot. to Supp. P. 3) This statement is true. While sitting at my office desk my computer sees ten Wi-Fi networks that are available. One of these available networks is named oysters_24. (Exhibit L) I have no idea whose network this is because it is owned by one of my neighbors and is password protected. Lindsay McGee within her home would have seen a password protected network name CAMDUCK-493937 in the available networks on her iPhone 12 and iPhone 13. To a layman, the CAMDUCK-493937 looked like any password protected Wi-Fi network being broadcasted from another house in close proximity. In other words, the CAMDUCK-493937 network was completely innocuous to Ms. McGee.

Lofton Investigation in Ms. McGee's Home

15. The Respondent claims that Lofton Investigation Solutions should have discovered the CAMDUCK spy camera during their search of Lindsay McGee home on Tuesday, July 25, 2023. (Respondent's Return to Mot. to Supp. P. 4) This statement is false, This inspection performed by Lofton Investigation Solutions was an RF spectrum analysis, which is designed to look for devices that are broadcasting some type of signal via cellular, Bluetooth, or Wi-Fi. On Tuesday, July 25, 2023, the CAMDUCK spy camera was physically unplugged from electrical power, so the device was not broadcasting any electronic signals that Lofton Investigation Solutions would have been able to pick up with their equipment. The RF spectrum analysis did discover a GPS tracking on Ms. McGee's vehicle. This GPS tracker was most likely installed by John Clayton, a private investigator hired by Justin McGee In June 2022. On Friday, October 27, 2023, Ms. McGee discovered another GPS tracker on her vehicle. According to John Clayton's deposition given on Friday, August 11, 2023, he used approximately sixteen or seventeen GPS trackers in his investigation against Lindsay McGee. (Clayton deposition. p. 8 ll. 15-25, and p. 9 ll. 1-4)

CAMDUCK recorded files

16. The Respondent claims that he originally purchased the CAMDUCK in January 2022 to use in his law office in South Carolina. (McGee Aff. ¶ 3; Return p. 1) The Respondent did not provide a purchase record for the CAMDUCK in his Return filed on Monday, November 13, 2023. A purchased record is needed to verify the Respondent's purchase claim. The Respondent also claimed that he noticed that the CAMDUCK was removed from his law office around August 20-24, 2022. (McGee Aff. ¶ 4; Return p. 1) The technical evidence on the CAMDUCK disputes this claim. The first recordings on this device are from January 2020 and are consistent with the other recordings taken by the CAMDUCK. (Exhibit M) In these first recordings, you can hear Lindsay McGee and her children's voices. These first recordings are time-stamped with the year 2020. This incorrect date is consistent with a device that is not connected to the internet, thus it cannot query an external time server, which was needed for the CAMDUCK to update its internal clock that maintains the time and date. These first recordings are from January 2022 but have a timestamp of January 2020 due to no internet connectivity.
17. The deleted recordings on the CAMDUCK range from January 01, 2020 to March 30, 2020. (Exhibit N) As previously stated these records are actually from January 2022 and March 2022. There are no recordings for the last day of March or for the month of April 2022 listed in the deleted files recorded. The first recording after April is on May 15, 2022. (Exhibit N) This is the date that someone used the CAMDUCK management

application to connect the spy camera to the Wi-Fi network in Lindsay's McGee home. In May 2022 Lindsay McGee restricted Justin McGee's physical access to her home. Prior to May 2022, the person monitoring the CAMDUCK did not require the device to be connected to the Wi-Fi network, because this person could access the camera's recordings inside the home using the CAMDUCK management application. After May 2022, the person monitoring the CAMDUCK had to do so remotely. I strongly believe that Justin McGee, the purchaser of the CAMDUCK, was the person who configured the spy camera to connect to the Wi-Fi network in Lindsay's McGee home. To date the Respondent still has not relinquished his mobile phones or tablets, which would allow us to determine how Justin McGee managed the thirteen covert surveillance cameras listed in the router logs, including the CAMDUCK.

18. Based on the deleted file timestamps the original recording mode was most likely triggered by motion detection. In later recordings, the CAMDUCK covert surveillance camera was placed in a loop recording mode. This mode continuously records in 10 minute segments. This mode allowed the CAMDUCK to record conversations or any other sounds in Ms. McGee's bedroom twenty-four hours a day. In other words the CAMDUCK made 144 recordings every day, which amounts to 1440 minutes of audio being recorded. This loop recording mode allowed the person monitoring the camera to hear all the conversations or sounds happening in the master bedroom, master bathroom, and areas directly adjacent to the bedroom, including the main living room directly outside of Ms. McGee's bedroom.

Surveillance of Ms. McGee

19. Ms. McGee moved into her current residence in February 2021. Justin McGee knew that his wife was moving out of their marital residence in January 2021. In January 2021, Justin McGee purchased covert surveillance equipment using his MasterCard ending in 3195 from The Spy Store and from ZETRONIX. (Exhibit D) On the March 2021 MasterCard statement, there is a purchase linked to Spy Associates, which sells covert surveillance equipment. (Exhibit E) The same Mastercard was used in April 2021 to purchase more surveillance equipment from BigSecurity, The Home Security Superstore, and B&H Photo. (Exhibit F) In July 2021, Justin McGee purchased four WF-113 wireless spy cameras from Amazon. There was an unknown purchase made from BestBuy in August 2021. Justin McGee's PayPal records show that he purchased surveillance cameras from SCS Enterprises, Deluxe CCTV, and Know Your Nanny in 2022. (Exhibit C) The router logs obtained from Ms. McGee indicated that seven spy cameras manufactured by SCS Enterprises were installed in her home. (Exhibit J) There is direct evidence that shows that Justin McGee purchased nine spy cameras manufactured by SCS Enterprises. Five of these spy cameras had the capability to

record audio. The technical evidence indicates that at least three of the SCS Enterprises spy cameras with audio recording capabilities were used in Ms. McGee's home by Justin McGee. The evidence strongly suggests that Justin McGee began camera surveillance within his estranged wife's home immediately after she moved to her new residence in February 2021.

20. On or about June 15, 2022, Justin McGee hired John Clayton, a licensed private investigator in South Carolina to conduct surveillance and track his estranged wife's physical movements outside of her home. (McGee Aff. ¶ 19; Return p. 3) This surveillance was in addition to all the covert surveillance cameras being used by Justin McGee to monitor Ms. McGee within the privacy of her home. John Clayton stated in his deposition given on Friday, August 11, 2023 that he started tracking Lindsay McGee using GPS trackers in June 2022. (Clayton deposition. p. 6, ll. 9-14) He stated that he used approximately sixteen or seventeen GPS trackers in his ongoing investigation tracking Lindsay McGee's physical movements. (Clayton deposition. p. 17, ll. 5-12) Mr. Clayton stated that he also placed covert surveillance cameras from Brickhouse Security in Ms. McGee's yard and in the adjacent neighbor's yards. (Clayton deposition. p. 12, ll. 22-25, and p. 13, ll. 1-24) Mr. Clayton was able to monitor these GPS trackers in realtime using an online service provided by SafeWatch Solutions based in Greenville, South Carolina. (Clayton deposition. p. 9, ll. 21-25) Mr. Clayton stated that he provided Justin McGee with a username and password for the online monitoring service. (Clayton deposition. p. 17, ll. 5-12) This access allowed Justin McGee to monitor Lindsay McGee's physical whereabouts twenty-four hours a day, seven days a week between June 2022 and October 2023. Mr. Clayton stated that he did not provide Justin McGee access to the tracking data after Mr. McGee was arrested in May 2023 on first-degree domestic violence and second-degree violent burglary related to an incident at his estranged wife's home. (Clayton deposition. p. 39, ll. 11-15, and p. 63, ll. 14-24) John Clayton's statement is most likely false because Justin McGee confronted Lindsay McGee about why she visited Money Man Pawn Shop on Monday, July 31, 2023, between the hours of 4:30 PM and 5:00 PM. She informed Justin McGee that she had purchased a handgun for personal protection while at the Money Man Pawn Shop. Justin McGee would not have known that his estranged wife was at a pawn shop unless he had complete access to the GPS tracking data being collected from a GPS device that John Clayton installed on Ms. McGee's vehicle after Mr. McGee was arrested for first-degree domestic violence. Ms. McGee discovered another GPS tracker on Friday, October 27, 2023.

Best Spy Camera Evidence in Respondent's Possession

21. Justin McGee has admitted to installing multiple spy cameras in Ms. McGee's private residence starting in 2021 (McGee Aff. ¶ 20; p. 12) and allegedly removing them in the Summer of 2022. (McGee Aff. ¶ 62; p. 13) There is indisputable technical evidence indicating that at least thirteen spy cameras were once deployed inside Ms. McGee's residence. Justin McGee has admitted to managing the nine SCS Enterprises' spy cameras with the IOTLiving remote management application. Mr. McGee has admitted to having eight of these spy cameras in his possession. 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 all the devices that he used to manage these cameras. The physical cameras are required to match their MAC addresses to ones that I previously identified in the log files obtained from Ms. McGee's router on Saturday, July 29, 2023, and the Smart Home Manager logs obtained on Saturday, July 22, 2023. Acquiring these spy cameras is crucial to our investigation. Based on the current technical evidence we know that at least four of the thirteen spy cameras placed in Ms. McGee's residence had the capability to record audio.

James Nolan email

22. In the Respondent's Return filed on Monday, November 13, 2023, there was an Exhibit A, which was an email allegedly sent to him by someone named "James Nolan". (McGee Aff. ¶ 8; Return p. 1) The authenticity of this email is in question for multiple reasons. First, Ms. McGee has stated to her attorney Peter Currence that she does not know any James Nolan. Second, the email address justin.m.mcgee2023@outlook.com is not one that Ms. McGee has ever used to communicate with Justin McGee. Third, the Respondent only provided the text of the email and not the underlying message header information. These message headers can be used to prove that an email message was actually transmitted and not created using a word processor. These message headers are also needed for law enforcement agencies, such as the South Carolina Law Enforcement Division (SLED) to work with the International Criminal Police Organization (INTERPOL) to obtain subscriber information related to the account jimnolan@protonmail.com from the company Proton based in Switzerland.

Technical Evidence as of 11-20-2023

23. 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 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 all the spy cameras purchased by Justin McGee and installed in Ms. McGee's private residence from February 2021 to July 2023. This request also includes the devices used by Justin McGee to monitor these spy cameras and any files captured by these devices.

Affidavit Status as of 11-20-2023

24. This third supplemental affidavit was developed in response to the Respondent's Return filed on Monday, November 13, 2023. As additional data from several outstanding subpoenas becomes available for analysis another supplemental affidavit will be created based on that data.

FURTHER THE AFFIANT SAYETH NOT!



John Bumgarner

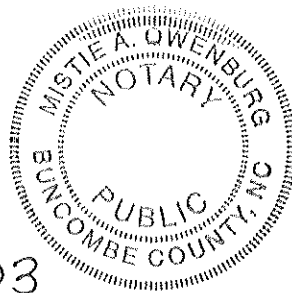
SWORN TO AND SUBSCRIBED BEFORE ME THIS

20th, DAY OF November, 2023.



NOTARY PUBLIC FOR NORTH CAROLINA

MY COMMISSION EXPIRES: 12-21-2023



SCS ENTERPRISES


Order #2536
January 31, 2022

SHIP TO

Justin McGee
125 A Wappoo Creek Dr
STE A
Charleston SC 29412
United States
(843) 847-1502

BILL TO

Justin McGee
125 A Wappoo Creek Dr
STE A
Charleston SC 29412
United States

ITEMS	QUANTITY
 WF-113 : Sony 1080p Chip Super low light Wireless Spy Camera with WIFI Digital IP Signal, Recording & Remote Internet Access (Camera Hidden in 3 AC Outlet with Dual USB Charging Port Wall Charger) DOWN / Add Audio / 32GB WF-113D-A-32	1 of 1

Thank you for shopping with us!

SCS Enterprises
6 Fortune Way, Montebello NY 10901, United States
info@spycameras.com
wiflspycameras.com

SCS ENTERPRISES



Order #2628
April 25, 2022

SHIP TO

Justin McGee
McGee Law Firm
125A Wappoo Creek Dr, STE A
STE A
Charleston SC 29412
United States
(843) 847-1502

BILL TO

Justin McGee
McGee Law Firm
125A Wappoo Creek Dr, STE A
STE A
Charleston SC 29412
United States

ITEMS	QUANTITY
 WF-113 : Sony 1080p Chip Super low light Wireless Spy Camera with WiFi Digital IP Signal, Recording & Remote Internet Access (Camera Hidden In 3 AC Outlet with Dual USB Charging Port Wall Charger)) Straight / Add Audio / 16GB WF-113-A	1 of 1
 WF-113 : Sony 1080p Chip Super low light Wireless Spy Camera with WiFi Digital IP Signal, Recording & Remote Internet Access (Camera Hidden In 3 AC Outlet with Dual USB Charging Port Wall Charger)) DOWN / Add Audio / 16GB WF-113D-A	1 of 1

Thank you for shopping with us!

SCS Enterprises
6 Fortune Way, Montebello NY 10901, United States
Info@spycameras.com
wifispycameras.com

SCS ENTERPRISES



Order #2747
July 26, 2022

SHIP TO

Justin McGee
125A Wappoo Creek Dr
Charleston SC 29412
United States
8438471502

BILL TO

Justin McGee
125A Wappoo Creek Dr
Charleston SC 29412
United States

ITEMS	QUANTITY
 <p>WF-113 : Sony 1080p Chlp Super low llight Wireless Spy Camera with WiFi Digital IP Signal, Recording & Remote Internet Access (Camera Hidden In 3 AC Outlet with Dual USB Charging Port Wall Charger)) DOWN / Add Audio / 16GB WF-113D-A</p>	1 of 1
 <p>WF-113 : Sony 1080p Chlp Super low llight Wireless Spy Camera with WiFi Digital IP Signal, Recording & Remote Internet Access (Camera Hidden In 3 AC Outlet with Dual USB Charging Port Wall Charger)) Straight / Add Audio / 16GB WF-113-A</p>	1 of 1

Thank you for shopping with us!

SCS Enterprises
6 Fortune Way, Montebello NY 10901, United States
Info@spycameras.com
wifispycameras.com



Exhibit D

JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 3195

Billing Questions:

800-854-7642

Website:

www.24-7cardaccess.com

Send Billing Inquiries To:

PO Box 2988, Omaha, NE 68103-2988

EVERYWHERE CARD Credit Card Account Statement
December 11, 2020 to January 10, 2021

SUMMARY OF ACCOUNT ACTIVITY

Previous Balance	\$2,529.97
- Payments	\$2,529.97
- Other Credits	\$0.00
+ Purchases	\$2,360.79
+ Cash Advances	\$0.00
+ Fees Charged	\$0.00
+ Interest Charged	\$0.00
= New Balance	\$2,360.79

Account Number XXXX XXXX XXXX 3195
 Credit Limit \$5,000.00
 Available Credit \$2,450.00
 Statement Closing Date January 10, 2021
 Days in Billing Cycle 31

PAYMENT INFORMATION

New Balance: \$2,360.79
 Minimum Payment Due: \$118.00
 Payment Due Date: February 4, 2021

MESSAGES

OUR NEW WEBSITE IS HERE! If you have not experienced our newly enhanced 24-7CardAccess.com, please take a moment and visit us. We have refreshed the look and feel for a more streamlined cardholder experience.

TRANSACTIONS

An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
01/04	01/04	F1485000400CHGDDA	AUTOMATIC PAYMENT - THANK YOU	\$2,529.97-
12/10	12/11	5542950P9RTSDV724	PAYPAL *ND TOYS BRICKL 4029357733 CA	\$38.15
12/10	12/11	5542950P9RTSDYFNL	PAYPAL *POORBOYS BRICK 4029357733 MD	\$21.47
12/10	12/11	5542950P9RTSNNA04	PAYPAL *CATHYANNARN BR 4029357733 CA	\$29.43
12/10	12/11	5542950P9RTSN0GFN	PAYPAL *OHBRICKWH BRIC 4029357733 CA	\$69.18
12/10	12/11	5542950P9RTSN2B7Q	PAYPAL *BRICKSR4KID BR 4029357733 CA	\$11.94

Transactions continued on next page

NOTICE: See reverse side of page 1 for important information.

5106 JRH 001 7 5 210110 0 PAGE 1 of 2 1 0 1485 2000 BP1R O1AB5106

EVERYWHERE CARD
PO BOX 723847
ATLANTA GA 31139-0847



Account Number: XXXX XXXX XXXX 3195
 New Balance: \$2,360.79
 Minimum Payment Due: \$118.00
 Payment Due Date: February 4, 2021

Please complete and enclose the bottom portion for proper credit.

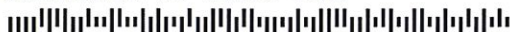
Amount Enclosed: \$



Indicate name or address change on reverse side and check here.

Make Check Payable to:

CARD SERVICES CENTER
PO BOX 71205
CHARLOTTE NC 28272-1205



Payments received at other than the address shown on the front of this statement may be subject to a delay in crediting of up to 5 days after the date of receipt.

JUSTIN M MCGEE
125A WAPPOO CREEK DR STE A
CHARLESTON SC 29412



559496201009319500011800002360798

MSCM 001513



JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 3195

TRANSACTIONS (continued) An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Table with 5 columns: Tran Date, Post Date, Reference Number, Transaction Description, Amount. Contains transaction history from 12/10 to 01/04.

\$2,360.79 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 02/04/21.

TOTAL *FINANCE CHARGE* BILLED IN 2020 \$0.00

INTEREST CHARGE CALCULATION

Your Annual Percentage Rate (APR) is the annual interest rate on your account

Table with 5 columns: Type of Balance, Annual Percentage Rate (APR), Balance Subject to Interest Rate, Days in Billing Cycle, Interest Charge. Rows for Purchases and Cash Advances.

(v) - variable

You can avoid additional interest on purchases by paying the New Balance in full by the payment due date. Payments received at other than the address shown on the front of this statement may be subject to a delay in crediting of up to 5 days after the date of receipt.

Are you making your payment through an online Bill Pay service? Look for the Payee "Card Assets" for faster delivery of your payment.

In order to ensure timely application of your payment, please remit payments to the following address:

CARD SERVICES CENTER

PO BOX 71205

CHARLOTTE, NC 28272-1205

For more information about your account, please contact us at: 1-800-854-7642 to speak to a live representative (24 hours/7 days).

NOTICE: See reverse side of page 1 for important information.

Exhibit E

JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

Billing Questions:

800-854-7642

Send Billing Inquiries To:

SUMMARY OF ACCOUNT ACTIVITY

Previous Balance	\$0.00
- Payments	\$2,360.79
- Other Credits	\$531.63
+ Purchases	\$1,470.59
+ Cash Advances	\$0.00
+ Fees Charged	\$0.00
+ Interest Charged	\$0.00
= New Balance	\$938.96

Account Number XXXX XXXX XXXX 4185
 Credit Limit \$5,000.00
 Available Credit \$3,141.00
 Statement Closing Date February 7, 2021
 Days in Billing Cycle 28

PAYMENT INFORMATION

New Balance: \$938.96
 Minimum Payment Due: \$47.00
 Payment Due Date: March 4, 2021

MESSAGES

Help us "Go Green" by reducing paper. Visit our website www.24-7cardaccess.com to sign up for electronic statements or to make a payment online.

TRANSACTIONS

An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
02/03	02/03	F14850014000IXFRL	PAYPAL *PATAGONIA 40293577 CREDIT	\$54.95-
02/04	02/04	F1485001300CHGDDA	AUTOMATIC PAYMENT - THANK YOU	\$2,360.79-
01/08	01/11	554295009RSD8TEAA	PAYPAL *CLEARLIGHTE CL 4029357733 CA	\$189.45
01/11	01/11	55429500BRTKG6028	PAYPAL *TRUTHFINDER 4029357733 CA	\$5.44
01/13	01/13	85353390D2YX6PK86	PAYPAL *PADDLE.COM 02038794714 GB	\$28.76
01/14	01/14	55429500ERTBT73X	PAYPAL *TRUTHFINDER 4029357733 CA	\$5.44
01/18	01/18	55429500JRITYJV3QZ	PAYPAL *S. MATRIX S. M 4029357733 FL	\$542.82

Transactions continued on next page

5106 JRH 001 7 5 210207 0 PAGE 1 of 2 1 0 1485 2000 BP1R O1AB5106

EVERYWHERE CARD
PO BOX 723847
ATLANTA GA 31139-0847

Account Number: XXXX XXXX XXXX 4185
 New Balance: \$938.96
 Minimum Payment Due: \$47.00
 Payment Due Date: March 4, 2021

Amount Enclosed: \$



Make Check Payable to:

CARD SERVICES CENTER
 PO BOX 71205
 CHARLOTTE NC 28272-1205

JUSTIN M MCGEE
 125A WAPPOO CREEK DR STE A
 CHARLESTON SC 29412



559496201009418500004700000938968

MSCM 001517

JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

TRANSACTIONS (continued)

An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
01/18	01/18	55310200KBMQPG4SY	KEEPSAKES FLORIST 8437667807 SC	\$218.00
01/19	01/19	55429500KRTZS06TZ	PAYPAL *NY TIMES NYTIM 4029357733 NY	\$4.00
01/24	01/24	55263520R2E07GBGK	TOM THUMB.COM # 1786 972-266-7050 TX	\$476.68
01/24	01/24	F1485000X000SA8D5	ADJUSTMENT-PURCHASES	\$476.68-
01/26	01/26	00000000000ATNEWA	BALANCE TRANSFER 5594 9620 1009 3195	\$2,360.79

\$938.96 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 03/04/21.

TOTAL *FINANCE CHARGE* BILLED IN 2020 \$0.00

INTEREST CHARGE CALCULATION

Your Annual Percentage Rate (APR) is the annual interest rate on your account

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Days in Billing Cycle	Interest Charge
Purchases	14.49% (v)	\$0.00	28	\$0.00
Cash Advances	17.99% (v)	\$0.00	28	\$0.00

(v) - variable



JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

Billing Questions:

800-854-7642

Website:

www.24-7cardaccess.com

Send Billing Inquiries To:

PO Box 2988, Omaha, NE 68103-2988

EVERYWHERE CARD Credit Card Account Statement
April 10, 2021 to May 10, 2021

SUMMARY OF ACCOUNT ACTIVITY

Previous Balance	\$1,623.82
- Payments	\$4,743.26
- Other Credits	\$1,700.00
+ Purchases	\$8,450.80
+ Cash Advances	\$0.00
+ Fees Charged	\$0.00
+ Interest Charged	\$0.00
= New Balance	\$3,631.36

PAYMENT INFORMATION

New Balance:	\$3,631.36
Minimum Payment Due:	\$182.00
Payment Due Date:	June 4, 2021

Account Number	XXXX XXXX XXXX 4185
Credit Limit	\$5,000.00
Available Credit	\$1,282.00
Statement Closing Date	May 10, 2021
Days in Billing Cycle	31

MESSAGES

Mastercard is excited to bring you new and enhanced cardholder benefits. To learn more, please visit your local branch, or go to www.mastercard.us.

TRANSACTIONS

An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
04/09	04/09	F14850036000IXFRL	PAYPAL *CAREYCOONIS 40293577 CREDIT	\$600.00-
04/09	04/09	554295033RSBGX9VB	PAYPAL *CAREYCOONIS 40293577 CREDIT	\$1,100.00-
04/13	04/13	85421203700XSM0ET	PAYMENT - THANK YOU	\$293.26-
04/26	04/26	85421203L00XSRZD9	PAYMENT - THANK YOU	\$3,200.00-
05/10	05/10	85421204200XSX84D	PAYMENT - THANK YOU	\$1,250.00-
04/09	04/10	054868034RBGLNNS3S	EXXONMOBIL 47600218 HOLLYWOOD SC	\$86.44

Transactions continued on next page

NOTICE: See reverse side of page 1 for important information.

5106 JRH 001 7 5 210510 0 PAGE 1 of 2 1 0 1485 2000 BP1R O1AB5106

EVERYWHERE CARD
3595 CANTON RD #312
MARIETTA, GA 30066-2658



Account Number:	XXXX XXXX XXXX 4185
New Balance:	\$3,631.36
Minimum Payment Due:	\$182.00
Payment Due Date:	June 4, 2021

Please complete and enclose the bottom portion for proper credit.

Amount Enclosed: \$

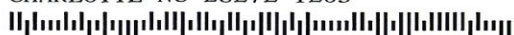


Indicate name or address change on reverse side and check here.

Make Check Payable to:

CARD SERVICES CENTER
PO BOX 71205
CHARLOTTE NC 28272-1205

JUSTIN M MCGEE
125A WAPPOO CREEK DR STE A
CHARLESTON SC 29412



559496201009418500018200003631367

MSCM 001523



JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

TRANSACTIONS (continued) An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Table with 5 columns: Tran Date, Post Date, Reference Number, Transaction Description, Amount. Contains transaction details from 04/11 to 05/04.

\$3,631.36 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 06/04/21.

INTEREST CHARGE CALCULATION

Your Annual Percentage Rate (APR) is the annual interest rate on your account

Table with 5 columns: Type of Balance, Annual Percentage Rate (APR), Balance Subject to Interest Rate, Days in Billing Cycle, Interest Charge. Rows for Purchases and Cash Advances.

(v) - variable

You can avoid additional interest on purchases by paying the New Balance in full by the payment due date. Payments received at other than the address shown on the front of this statement may be subject to a delay in crediting of up to 5 days after the date of receipt.

Are you making your payment through an online Bill Pay service? Look for the Payee "Card Assets" for faster delivery of your payment.

For more information about your account, please contact us at: 1-800-854-7642 to speak to a live representative (24 hours/7 days).

NOTICE: See reverse side of page 1 for important information.



JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

Billing Questions:

800-854-7642

Website:

www.24-7cardaccess.com

Send Billing Inquiries To:

PO Box 2988, Omaha, NE 68103-2988

EVERYWHERE CARD Credit Card Account Statement
August 11, 2021 to September 9, 2021

SUMMARY OF ACCOUNT ACTIVITY

Previous Balance	\$3,524.61
- Payments	\$5,900.00
- Other Credits	\$80.15
+ Purchases	\$5,290.51
+ Cash Advances	\$0.00
+ Fees Charged	\$0.00
+ Interest Charged	\$0.00
= New Balance	\$2,834.97

Account Number XXXX XXXX XXXX 4185
 Credit Limit \$5,000.00
 Available Credit \$2,165.00
 Statement Closing Date September 9, 2021
 Days in Billing Cycle 30

PAYMENT INFORMATION

New Balance: \$2,834.97
 Minimum Payment Due: \$142.00
 Payment Due Date: October 4, 2021

MESSAGES

Mastercard is excited to bring you new and enhanced cardholder benefits. To learn more, please visit your local branch, or go to www.mastercard.us.

TRANSACTIONS

An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
08/14	08/14	05410197331T7TR9N	STAPLES DIRECT FRAMINGHAM MA CREDIT	\$80.15-
08/18	08/18	85421207600XSX84Q	PAYMENT - THANK YOU	\$2,500.00-
08/30	08/30	85421207J00XV0XA4	PAYMENT - THANK YOU	\$1,250.00-
09/08	09/08	85421207V00XV3M6S	PAYMENT - THANK YOU	\$2,150.00-
08/09	08/11	75306376Y4TQFX4J9	LYERLY S CLEANERS CHARLESTON SC	\$124.91
08/10	08/11	55429506YRTSBJ3F	PAYPAL *MACKENZIERE18 4029357733 CA	\$360.45

Transactions continued on next page

NOTICE: See reverse side of page 1 for important information.

5106 JRH 001 7 5 210909 0 PAGE 1 of 3 1 0 1485 2000 BP1R 01AB5106

EVERYWHERE CARD
3595 CANTON RD #312
MARIETTA, GA 30066-2658



Account Number: XXXX XXXX XXXX 4185
 New Balance: \$2,834.97
 Minimum Payment Due: \$142.00
 Payment Due Date: October 4, 2021

Please complete and enclose the bottom portion for proper credit.

Amount Enclosed: \$



Indicate name or address change on reverse side and check here.

Make Check Payable to:

CARD SERVICES CENTER
PO BOX 71205
CHARLOTTE NC 28272-1205

JUSTIN M MCGEE
125A WAPPOO CREEK DR STE A
CHARLESTON SC 29412



559496201009418500014200002834974

MSCM 001531



JUSTIN M MCGEE

Account Number: XXXX XXXX XXXX 4185

TRANSACTIONS (continued) An amount followed by a minus sign (-) is a credit unless otherwise indicated.

Table with columns: Tran Date, Post Date, Reference Number, Transaction Description, Amount. Contains transaction details from 08/10 to 09/06.

\$2,834.97 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 10/04/21.

INTEREST CHARGE CALCULATION

Your Annual Percentage Rate (APR) is the annual interest rate on your account

Table with columns: Type of Balance, Annual Percentage Rate (APR), Balance Subject to Interest Rate, Days in Billing Cycle, Interest Charge. Rows for Purchases and Cash Advances.

(v) - variable

NOTICE: See reverse side of page 1 for important information.



Previously connected

Exhibit H

-  GF-PH130
-  GF-PH130
-  GF-PH130
-  GF-PH130
-  GF-PH130
-  GF-PH130
-  GF-PH130

GF-PH130 is the default name for the spy cameras manufactured by SCS Enterprises. Justin McGee purchased 9 of these cameras. Five of the nine had the capability to record audio.

The evidence shows that seven GF-PH130 cameras were once installed in Lindsay McGee's home. The evidence indicates that at least 3 of these cameras were recording audio.



HP

1mo ago



Iphone-10-X

1d ago



GF-PH130



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

0C:CF:89:22:5F:47



Block



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

A0:9F:10:6F:15:A0



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

30:7B:C9:26:1C:9C



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

0C:CF:89:23:BE:4C



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

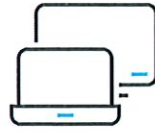
[Troubleshoot device](#)



Device info

MAC address

A0:9F:10:32:E8:5F



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

A0:9F:10:33:52:24



GF-PH130

Offline

CONTROL CENTER



Pause Wi-Fi

Pause internet to this device.



Prioritize device

Increase bandwidth to this device.

Profile



MORE

Still Experiencing Internet Issues?

[Troubleshoot device](#)



Device info

MAC address

A0:9F:10:3C:30:18



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::df07: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	
Connection Type	Wi-Fi  2.4 GHz Type: Home Name: ATTGRYhNQs	
Mesh Client	No	
MAC Address	0c:cf:89:22:5f:47	Unknown spy camera that uses the same Wi-Fi components as those used in the CAMDUCK and SCS Enterprises' cameras.
Name	unknown0ccf89225f47	
Last Activity	Sat Jul 29 06:36:15 2023	
Status	off	
Allocation	static	
Connection Type	Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs	
Mesh Client	No	
MAC Address	0c:cf:89:23:be:4c	GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.
Name	GF-PH130	
Last Activity	Thu Jul 20 15:25:02 2023	
Status	off	
Allocation	dhcp	
Connection Type	Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs	
Mesh Client	No	
MAC Address	0c:cf:89:50:51:f8	Unknown spy camera that uses the same Wi-Fi components as those used in the CAMDUCK and SCS Enterprises' cameras.
Name	unknown0ccf895051f8	
Last Activity	Thu Jul 13 17:55:48 2023	
Status	off	
Allocation	dhcp	
Connection Type	Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs	
Mesh Client	No	
MAC Address	0c:cf:89:a4:02:8a	CAMDUCK 5U HD Wi-Fi Surveillance Camera
Name	unknown0ccf89a4028a	
Last Activity	Wed May 31 15:56:47 2023	
Status	off	
Allocation	dhcp	
Connection Type	Wi-Fi 2.4 GHz Type: Home Name: ATTGRYhNQs	
Mesh Client	No	
MAC Address	0c:cf:89:b1:cb:93	Unknown spy camera that uses the same Wi-Fi components as those used in the CAMDUCK and SCS Enterprises' cameras.
Name	unknown0ccf89b1cb93	
Last Activity	Mon Jun 12 21:46:02 2023	
Status	off	
Allocation	dhcp	
Connection Type	Wi-Fi 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	
Connection Type	Wi-Fi 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
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address 1c:1b:b5:6b:6a:5c
Name LAPTOP-QIK7J0A1
Last Activity Sat Jun 10 12:40:13 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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
Wi-Fi 
Connection Type 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

GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.

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	unknown4a29cddebb9
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
Connection Type Wi-Fi
2.4 GHz
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
Connection Type Wi-Fi
5 GHz
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
Connection Type Wi-Fi
5 GHz
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
Connection Type Wi-Fi
2.4 GHz
Type: Home
Name: ATTGRYhNQs

Unknown spy camera that uses the same Wi-Fi components as those used in the CAMDUCK and SCS Enterprises' cameras.

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
Connection Type Wi-Fi
2.4 GHz
Type: Home
Name: ATTGRYhNQs

Unknown device that uses Wi-Fi components linked to Sichuan surveillance cameras.

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
Connection Type Wi-Fi 
2.4 GHz
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
Connection Type	Wi-Fi  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
Connection Type	Wi-Fi 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
Connection Type	Wi-Fi 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
Connection Type	Wi-Fi 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
Connection Type	Wi-Fi 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
Connection Type	Wi-Fi 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

GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.

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

GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.

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

GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.

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

GF-PH130 is the default name used for spy cameras manufactured by SCS Enterprises.


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 unknownae5c1eeeedd0
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
Connection Type Wi-Fi
5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address ae:cd:74:a8:9f:1b
Name unknownaecd74a89f1b
Last Activity Thu Jul 13 12:25:53 2023
Status off
Allocation dhcp
Connection Type Wi-Fi
5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address ae:e5:bd:cd:9f:38
Name unknownaee5bcd9f38
Last Activity Wed Jul 26 11:47:20 2023
Status off
Allocation dhcp
Connection Type Wi-Fi
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
Connection Type Wi-Fi 
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
Connection Type Wi-Fi 
5 GHz
Type: Home
Name: ATTGRYhNQs
Mesh Client No

MAC Address bc:ce:25:f9:2a:95
Name unknownbce25f92a95
Last Activity Fri Jul 21 17:53:02 2023

Status off
Allocation dhcp
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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
Wi-Fi
Connection Type 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 Justins-iPhone
Last Activity Sat Jul 8 21:05:10 2023
Status off
Allocation dhcp
Wi-Fi
Connection Type 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


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::5549:7846:7b4c: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

Exhibit J

Date Collected: July 22, 2023			
<p style="color: red;">These devices were listed in the AT&T Smart Home Manager application used to remotely control the Wi-Fi network in Lindsay McGee's Home. Seven of the devices are cameras manufactured by SCS Enterprises. The other unknown devices have linked to vendors that also manufacture spy cameras.</p>			
MAC Address	Device Name	Vendor Name	Camera Vendor
0C:CF:89:22:5F:47	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
0C:CF:89:23:BE:4C	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
30:7B:C9:26:1C:9C	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
A0:9F:10:33:52:24	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
A0:9F:10:3C:30:18	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
A0:9F:10:6F:15:A0	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
A0:9F:10:32:E8:5F	GF-PH130	Shenzhen Bilian Electronic Co Ltd	SCS Enterprises
0C:CF:89:50:51:F8	Shenzhen Device	Shenzhen Bilian Electronic Co Ltd	Unknown
0C:CF:89:A4:02:8A	Shenzhen Device	Shenzhen Bilian Electronic Co Ltd	CAMDUCK
0C:CF:89:B1:CB:93	Shenzhen Device	Shenzhen Bilian Electronic Co Ltd	Unknown
54:EF:33:45:D4:B0	Shenzhen Device	Shenzhen Bilian Electronic Co Ltd	Unknown
44:B2:95:75:B4:FE	SichuanA Device	Sichuan AI-Link Technology Co., Ltd.	Unknown
54:F1:5F:E6:9E:3E	SichuanA Device	Sichuan AI-Link Technology Co., Ltd.	Unknown

Exhibit K

```
~ % arp -a  
captive.apple.com (192.168.234.1) at c:cf:89:a4:2:8a on en0  
? (192.168.234.255) at ff:ff:ff:ff:ff:ff on en0 ifscope [etherne  
? (224.0.0.251) at 1:0:5e:0:0:fb on en0 ifscope permanent [ethernet]  
? (239.255.255.250) at 1:0:5e:7f:ff:fa on en0 ifscope permanent [ethernet]  
~ %
```

CAMDUCK Spy Camera

Exhibit L

- Other Networks
- Brunton_Home
 - Brunton_Home_EXT
 - DIRECT-3D-HP ENVY 7640 series
 - MKAGuestNetwork
 - MyCharterWiFi19-2G
 - MySpectrumWiFib0-2G
 - Spectrum Mobile
 - SpectrumSetup-51
 - oysters24
 - ARLO_VMB_2449229112

Exhibit M

A snippet of the files contained on the CAMDUCK spy camera

File Name	File Location	File size	Created Date	Modified Date	Deletion status
REC_095409_100_00.jpg		3282	2020-Jan-01 12:00:05	2020-Jan-01 12:00:04	no
REC_093101_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20220923\09\REC_093101_100_00.jpg	2534	2020-Jan-01 12:00:06	2020-Jan-01 12:00:06	no
REC_065052_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20220912\06\REC_065052_100_00.jpg	2545	2020-Jan-01 12:00:06	2020-Jan-01 12:00:06	no
REC_081341_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20220918\08\REC_081341_100_00.jpg	2553	2020-Jan-01 12:00:06	2020-Jan-01 12:00:06	no
REC_023324_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20220905\02\REC_023324_100_00.jpg	2571	2020-Jan-01 12:00:06	2020-Jan-01 12:00:06	no
REC_093759_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20221003\09\REC_093759_100_00.jpg	2551	2020-Jan-01 12:00:06	2020-Jan-01 12:00:06	no
10200102	Partition 1\WONAME [FAT32](root)\record\10200102\	0	2020-Jan-02 04:13:04	2020-Jan-02 04:13:04	yes
10200104	Partition 1\WONAME [FAT32](root)\record\10200104\	0	2020-Jan-05 03:11:11	2020-Jan-05 03:21:14	yes
10200105	Partition 1\WONAME [FAT32](root)\record\10200105\	0	2020-Jan-06 04:07:19	2020-Jan-06 04:07:18	yes
10200114	Partition 1\WONAME [FAT32](root)\record\10200114\	0	2020-Jan-15 03:19:31	2020-Jan-15 03:22:22	yes
REC_160335_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_160335_100_00.jpg	2552	2020-Jan-15 20:03:35	2020-Jan-15 20:03:34	yes
REC_160335_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_160335_100_00.mp4	4846517	2020-Jan-15 20:13:37	2020-Jan-15 20:13:36	yes
REC_161337_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_161337_100_00.jpg	2538	2020-Jan-15 20:13:37	2020-Jan-15 20:13:36	yes
REC_161337_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_161337_100_00.mp4	4881333	2020-Jan-15 20:23:39	2020-Jan-15 20:23:38	yes
REC_162340_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_162340_100_00.jpg	2546	2020-Jan-15 20:23:40	2020-Jan-15 20:23:40	yes
REC_162340_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_162340_100_00.mp4	4930136	2020-Jan-15 20:33:42	2020-Jan-15 20:33:42	yes
REC_163342_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_163342_100_00.jpg	2550	2020-Jan-15 20:33:42	2020-Jan-15 20:33:42	yes
REC_163342_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_163342_100_00.mp4	4950495	2020-Jan-15 20:43:44	2020-Jan-15 20:43:44	yes
REC_164344_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_164344_100_00.jpg	2542	2020-Jan-15 20:43:44	2020-Jan-15 20:43:44	yes
REC_164344_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_164344_100_00.mp4	4939506	2020-Jan-15 20:53:46	2020-Jan-15 20:53:46	yes
REC_165347_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_165347_100_00.jpg	2539	2020-Jan-15 20:53:47	2020-Jan-15 20:53:46	yes
16	Partition 1\WONAME [FAT32](root)\record\20200115\06\	16384	2020-Jan-15 21:03:49	2020-Jan-15 21:03:48	yes
rec.log	Partition 1\WONAME [FAT32](root)\record\20200115\06\rec.log	1144	2020-Jan-15 21:03:49	2020-Jan-15 21:03:48	yes
REC_165347_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\06\REC_165347_100_00.mp4	4961042	2020-Jan-15 21:03:49	2020-Jan-15 21:03:48	yes
REC_170349_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_170349_100_00.jpg	2545	2020-Jan-15 21:03:49	2020-Jan-15 21:03:48	no
20200115	Partition 1\WONAME [FAT32](root)\record\20200115\	16384	2020-Jan-15 21:13:51	2020-Jan-15 21:17:02	no
REC_170349_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_170349_100_00.mp4	4966856	2020-Jan-15 21:13:51	2020-Jan-15 21:13:50	no
REC_171352_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_171352_100_00.jpg	2527	2020-Jan-15 21:13:52	2020-Jan-15 21:13:52	no
.delfile.log	Partition 1\WONAME [FAT32](root)\delfile.log	1145712	2020-Jan-15 21:17:03	2020-Jan-15 21:17:02	no
REC_171352_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_171352_100_00.mp4	4929031	2020-Jan-15 21:23:54	2020-Jan-15 21:23:54	no
REC_172354_100_00.jpg	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_172354_100_00.jpg	2542	2020-Jan-15 21:23:54	2020-Jan-15 21:23:54	no
record	Partition 1\WONAME [FAT32](root)\record\	16384	2020-Jan-15 21:33:56	2020-Jan-15 21:33:56	no
photo.tmp	Partition 1\WONAME [FAT32](root)\record\photo.tmp	2541	2020-Jan-15 21:33:56	2020-Jan-15 21:33:56	no
17	Partition 1\WONAME [FAT32](root)\record\20200115\17\	16384	2020-Jan-15 21:33:56	2020-Jan-15 21:33:56	no
rec.log	Partition 1\WONAME [FAT32](root)\record\20200115\17\rec.log	604	2020-Jan-15 21:33:56	2020-Jan-15 21:33:56	no
REC_172354_100_00.mp4	Partition 1\WONAME [FAT32](root)\record\20200115\17\REC_172354_100_00.mp4	4944751	2020-Jan-15 21:33:56	2020-Jan-15 21:33:56	no
record.tmp	Partition 1\WONAME [FAT32](root)\record\record.tmp	3415383	2020-Jan-15 21:40:30	2020-Jan-15 21:40:30	no

A snippet of the deleted files contained on the CAMDUCK spy camera			
Date	Time	File size	File location
2020-03-30	3:11:09	351879680	/bin/vslocal/sd/record/20200329
2022-05-15	14:51:00	562315776	/bin/vslocal/sd/record/20220510/09
2022-05-15	15:23:45	776929792	/bin/vslocal/sd/record/20220510/10
2022-05-15	16:10:28	740557312	/bin/vslocal/sd/record/20220510/11
2022-05-15	17:30:13	807567872	/bin/vslocal/sd/record/20220510/12
2022-05-15	19:17:04	733446656	/bin/vslocal/sd/record/20220510/13
2022-05-15	20:46:11	687849984	/bin/vslocal/sd/record/20220510/14
2022-05-15	21:54:30	692158976	/bin/vslocal/sd/record/20220510/15

**SUPPLEMENTAL REPLY AFFIDAVIT
OF LINDSAY F. MCGEE IN SUPPORT
OF MOTION TO SUPPRESS
EVIDENCE**

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.

Justin McGee, Respondent.

v.

Lindsay F. McGee, Petitioner.

**SUPPLEMENTAL REPLY AFFIDAVIT OF LINDSAY F. MCGEE IN SUPPORT OF
MOTION TO SUPPRESS EVIDENCE**

PERSONALLY APPEARED before me Lindsay F. McGee who, first being duly sworn, states
as follows:

1. My name is Lindsay F. McGee, and I am thirty-eight (38) years old. I am the Petitioner in this action and testify from my own personal knowledge.
2. On November 1, 2023, I found the CAMDUCK charging station inside the cabinet of my nightstand while cleaning. When I picked up the CAMDUCK charging station it occurred to me that Respondent purchased this device and placed it inside of my residence at McCutchen Street. I examined the device and quickly identified a pin hole on the front of the charging station. I turned the device over and could see it had a perforated back cover. I removed the cover and located a micro-SD card. I contacted my attorney who requested I deliver the CAMDUCK charging station to Steve Abrams the same day.

3. Respondent was truthful when he stated he did not place the camera inside my bedside table. Instead, the Respondent set up the CamDuck charging station on a dresser in my bedroom and recommended that I use it as a charging station. Respondent set up the CamDuck charging station in a location that provided an unobstructed view of my entire bedroom and the door to my bathroom.
4. The CamDuck charging station is black and bulky. I did not want the CamDuck charger to be visible on the dresser because of its appearance. I moved the charging station to my nightstand because the cabinet concealed the bulky charger and the items being charged. This piece of furniture has a hole in the back that allows cords to be fed through to the wall outlet which was meant to conceal cords when charging electronics. The Respondent questioned what I had done with the CamDuck charger, and I showed him that I moved the CamDuck charger to my nightstand.
5. When the Respondent set up the CamDuck charger station in January 2022 it did not seem odd to me because Respondent had already purchased similar chargers and outlet extenders for my home due to the lack of available wall outlets.
6. I primarily used the CamDuck charger for my cell phone and an Oura ring. I kept numerous other items in the same cabinet, so it was not uncommon for me to leave the cabinet door open for hours at a time.
7. In early October 2022, I stopped using my Oura ring because I was concerned that Respondent was somehow using it to track my location. Once I stopped using my Oura ring, the only thing I needed to charge in my bedroom was my cell phone. At this time, I unplugged the CamDuck charger and began using the wall outlet behind my bed to charge

my phone. The wall outlet charged my phone much faster than the CamDuck charger, and I no longer used the Oura ring, so the CamDuck charger became superfluous.

8. I believe that Lionel Lofton did not find the CamDuck charger and hidden camera during his sweep of my home in July 2023 because it was not easily visible or plugged and transmitting a signal. I did not even see this device when I initially searched my home for hidden cameras. The device had been unplugged and out of use since October 2022, and its black color made it difficult to see inside of the unlit lower cabinet.
9. Inexplicitly the Respondent concluded that I knew about this hidden camera and withheld its disclosure based off an email sent to him by an unknown individual ten (10) days after I turned the CamDuck charger over to my experts. I have absolutely no reason to delay these proceedings, nor do I benefit from their delay. The subsequent discovery of this device resulted in additional attorney and expert fees that would have been mitigated had I found this device prior to my initial filing.
10. I wholeheartedly believe the Respondent sent the email to himself to humiliate me and detract from the real issues at hand. I believe the Respondent made these accusations because he has no plausible defense for placing hidden cameras inside my home. I do not know anyone by the name of James Nolan. I have never engaged in the sort of activities described in the email that was received by Respondent at an email address that the Respondent only recently began using.
11. If the email correspondence received by Respondent was accurate, I would have engaged in the activities described prior to October 2022 when the CamDuck charger was still in use. Respondent would have the court believe that thirteen (13) months later, I provided this previously unknown third party with Respondent's email address despite knowing that

any correspondence would be produced and subsequently viewed by all attorneys involved in this matter.

12. The Respondent has tracked my every move since June 2022, and freely admits he has been using hidden cameras to watch me since 2013. To this day, the Respondent continues to monitor my location using GPS trackers. On October 27, 2023, a GPS tracker was found in my driveway when Respondent's private investigator inadvertently left it behind after he switched out the tracker with one that had a fresh battery. I assume there is an active GPS tracker on my vehicle right now, but I am tired of searching for them and have nothing to hide. If I had ever been involved with a "James Nolan" his existence would certainly be known to the Respondent. If there was any shred of truth to the allegations contained in the email submitted by Respondent, I am positive Respondent would have already brought these issues to the court's attention.
13. The Respondent alleges that the stay in the lower court is not in the best interests of our children due to the lack of a holiday schedule and requirement to confer on important decisions affecting our children. Respondent is intentionally vague about the effect of the current stay because it does not affect our children. Currently the Respondent and I share custody and have a week on – week off parenting schedule. Our present schedule provides Respondent with Thanksgiving, New Years Eve, and New Years Day. I am scheduled to have the Christmas holiday which is appropriate because Respondent had the children for Christmas in 2022. We are well within our rights to modify the existing parenting schedule, but Respondent has not raised any concerns or requested we deviate from the existing schedule.

14. Respondent failed to cite any pressing matter affecting our children because none exists. Aside from me wanting to hire a tutor for one of my children and the Respondent indicating he would not participate during his parenting time, there are no significant child-related issues that have been raised or need to be addressed.¹
15. Respondent falsely claimed he was solely responsible for childcare costs, and that he could no longer send our daughter to preschool. Respondent never informed the school our daughter would no longer attend and objected to formally withdrawing her from preschool.² I reimbursed Respondent for childcare expenses and requested access to the online portal to pay her tuition. Respondent has repeatedly denied me access to the online tuition portal.³ Apparently, the Respondent now has the means to pay this expense and has offered to cover my portion of these costs until a final resolution of this matter.⁴
16. The Respondent also indicated that I am not paying the Guardian *ad Litem*, and the stay needs to be lifted to enforce the Order appointing the Guardian *ad litem*. This claim is also false because I entered into a payment agreement with the Guardian *ad litem*. The Respondent and his attorneys have incessantly emailed the Guardian *ad litem* on an almost daily basis to increase her fees to a point that I could no longer pay. Respondent was successful; however, I proactively contacted the Guardian *ad litem*, informed her of my situation, and negotiated a payment plan.
17. I am positive that the Respondent set up the CamDuck charger inside of my bedroom. I had no idea the CamDuck charger had a hidden camera and a recording device until I

¹ See Our Family Wizard messages between Petitioner and Respondent dated October 30, 2023 and attached hereto as **Exhibit A**.

² See Our Family Wizard messages between Petitioner and Respondent dated November 12-14, 2023 and attached hereto as **Exhibit B**.

³ See **Exhibit B**.

⁴ See **Exhibit B**.

discovered it on November 1, 2023. Prior to my dealings with John Baumgarner, I would not even have known what to look for to determine whether the device had a hidden camera. I have never downloaded any software or application to view the images on the CamDuck charger, nor I do know what type of software or application is required to view those images.

18. Nevertheless, the Respondent is the only person who has had unsupervised access to my home. Prior to a family trip to North Carolina in late May 2022, I frequently allowed Respondent to watch the children at my home while I left to go exercise or run errands.
19. Respondent claimed he purchased the CamDuck charging station for the McGee Law Firm but chose not to produce any corroborating evidence of video he captured while it was located at the office. I have never seen the CamDuck charger at the law firm and firmly believe it was set up at McCutchen Street shortly after it was purchased by Respondent.
20. If the camera was set up at our law firm, but then went missing as Respondent claims, he could have looked at the last available footage to determine who unplugged the device. Instead, the Respondent would have the court believe that an expensive device with recordings of possible attorney-client privileged communications went missing, and Respondent did nothing to determine what happened to that device.
21. While I do not believe this device was ever located at the McGee Law Firm, the Respondent stated that he has used other outlet extenders with hidden audio and visual capabilities inside our office. I am a partner of McGee Law Firm, but the Respondent never informed me there were hidden cameras with audio capabilities inside of our office. I do not believe Respondent ever informed our employees that the office contained hidden cameras. I do

not believe Respondent informed the attorneys who sublet office space from McGee Law Firm that their conversations inside of the office were being monitored.

22. I have serious concerns about the Respondent placing hidden cameras inside of our office.


We frequently held depositions and mediations at McGee Law Firm, and Respondent could have used those cameras to listen to conversations between other attorneys and their clients.

23. By placing this device inside my home Respondent was also able to listen in on privileged attorney-client discussions with my former employer. From November 2021 until July 2022, I was employed as corporate counsel for a pharmaceutical clinical research organization and oversaw the international acquisition of that company. My position was 95% remote and all my communications with my employer and outside counsel were conducted inside of McCutchen Street using Microsoft Teams. I was primarily responsible for watching the children each day after school, and because my office did not have a door, I frequently had to use my bedroom for sensitive meetings conducted via Microsoft Teams.

24. I am over the age of twenty-one (21) years and competent to testify to the matters stated herein. I have read the foregoing paragraphs, all matters stated there are correct and true and are based upon my own personal knowledge and belief, except those alleged-on information and belief and as to those, I believe them to be true and accurate.


LINDSAY MCGEE

Sworn and subscribed before me
this 17th day of November, 2023


AMANDA BELK
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: My Commission
Expires Jul 24, 2023

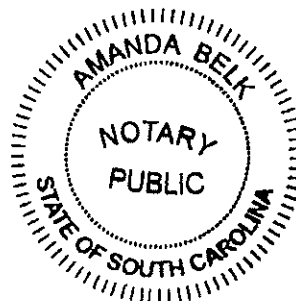


EXHIBIT A

(Our Family Wizard message dated October 30, 2023)

Message Report

OurFamilyWizard

Generated: 11/15/2023 at 10:31 PM by Lindsay McGee

Number of messages: 2

Timezone: America/New_York

Parents: Lindsay McGee, Justin McGee

Child(ren): A ██████ McGee, C ██████ McGee, H ██████ McGee

Third Party: Liz Stringer

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 2

Sent: 10/30/2023 at 04:09 PM
From: Lindsay McGee
To: Justin McGee (First Viewed: 10/30/2023 at 04:10 PM)
Subject: H ██████ Data Conference, iReady scores and tutoring
Attachments: HMM_i_Ready_results_and_classwork.pdf (2 MB)

Attached you will find H ██████'s iReady scores and some classwork to review. I attended the Data Conference with H ██████'s teacher today and discussed these documents.

H ██████ desperately needs tutoring. I found and contacted a tutor that is OG certified as recommended by Cadie at Tidewater Neuropsych. She charges \$60 an hour and we are still hammering out a date and time. It will be much easier now that soccer is over.

H ██████ also needs OT PT.

I am going sign him up for tutoring and wonder if you would like for him to participate on your parenting weeks? I will need to alternate therapies (tutoring, David and OT) due to the cost and my current financial situation. I may just ask to cut back with David to 1x per month vs. 2.

Please let me know your thoughts and preference as to tutoring.

Message 2 of 2

Sent: 10/30/2023 at 04:27 PM
From: Justin McGee
To: Lindsay McGee (First Viewed: 10/30/2023 at 04:32 PM)
Subject: Re: H ██████ Data Conference, iReady scores and tutoring

I cannot assist financially with anything additional for the kids. I've already canceled all David sessions for my time. I cannot and will not be paying for O'Quinn and AJM will not be attending during my time. I have not paid and cannot pay the health insurance premium. I have not paid and cannot pay the Cub Scouts registration fees for the boys that is due this month. I can no longer pay the expenses of the law firm and expect creditors will begin pursuing us personally for those debts.

Quite frankly, you can't afford these things either. Have you paid the GAL? Did you pay the 2021 IRS liability that is incurring fees and penalties?

I will never understand the choices you've made, but we're all about to feel the full consequences of them.

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EXHIBIT B

(Our Family Wizard messages dated November 12-14, 2023)

Message Report

➤ OurFamilyWizard

Generated: 11/15/2023 at 10:48 PM by Lindsay McGee
Number of messages: 1
Timezone: America/New_York
Parents: Lindsay McGee, Justin McGee
Child(ren): ~~Alexis~~ McGee, ~~Charles~~ McGee, ~~Harley~~ McGee
Third Party: Liz Stringer

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 11/14/2023 at 07:17 PM
From: Justin McGee
To: Lindsay McGee (*First Viewed: 11/14/2023 at 07:17 PM*)
Subject: Re: O'Quinn

I will pay for O'Quinn and we can figure out how it gets allocated later. Please take her back to O'Quinn as soon as she's feeling better.

On 11/12/2023 at 02:37 PM, Lindsay McGee wrote:

To: Justin McGee (*First Viewed: 11/12/2023 at 02:42 PM*)
Subject: Re: O'Quinn

It counts as a cash advance. I did this and my credit limit was as lowered because of too many cash advances.

Real world hypothetical- Mr Loser uses his credit card to Venmo \$25 to his lady (or male) friend on Only Fans. The amount on his credit card will appear as \$27.50 to account for the cash advance fee.

On 11/12/2023 at 01:51 PM, Justin McGee wrote:

To: Lindsay McGee (*First Viewed: 11/12/2023 at 02:33 PM*)
Subject: Re: O'Quinn

You can use a credit card to pay me on Venmo.

On 11/12/2023 at 01:50 PM, Lindsay McGee wrote:

To: Justin McGee (*First Viewed: 11/12/2023 at 01:50 PM*)
Subject: Re: O'Quinn

This would be a different story if you gave me access to the account to pay with my own credit card. You are using credit and expecting me to pay you cash. You refused to allow me access to the payment portal. I don't have the cash.

Ok, then you can pick her up from school on Friday.

On 11/12/2023 at 01:37 PM, Justin McGee wrote:

To: Lindsay McGee (*First Viewed: 11/12/2023 at 01:48 PM*)
Subject: Re: O'Quinn

I do not agree to "withdraw" her. We signed a contract.

What I really need is for you to reimburse me expenses and pay your portion of her childcare.

On 11/12/2023 at 01:12 PM, Lindsay McGee wrote:

To: Justin McGee (*First Viewed: 11/12/2023 at 01:12 PM*)

Subject: O'Quinn

Have you notified Ms. Rigtrup and/or Sharon about withdrawing ~~A~~? If not, would you like for me to notify them?

Going forward, we can just plan on exchanging ~~A~~ at EF. My assumption is that the parent with the Friday overnight will still be responsible for picking up the boys from school. Please let me know if you have a different understanding.

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.

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v.

Lindsay F. McGee, Petitioner.

**SUPPLEMENTAL REPLY AFFIDAVIT OF LINDSAY F. MCGEE IN SUPPORT OF
MOTION TO SUPPRESS EVIDENCE**

PERSONALLY APPEARED before me Lindsay F. McGee who, first being duly sworn, states
as follows:

1. My name is Lindsay F. McGee, and I am thirty-eight (38) years old. I am the Petitioner in this action and testify from my own personal knowledge.
2. On November 1, 2023, I found the CAMDUCK charging station inside the cabinet of my nightstand while cleaning. When I picked up the CAMDUCK charging station it occurred to me that Respondent purchased this device and placed it inside of my residence at McCutchen Street. I examined the device and quickly identified a pin hole on the front of the charging station. I turned the device over and could see it had a perforated back cover. I removed the cover and located a micro-SD card. I contacted my attorney who requested I deliver the CAMDUCK charging station to Steve Abrams the same day.

3. Respondent was truthful when he stated he did not place the camera inside my bedside table. Instead, the Respondent set up the CamDuck charging station on a dresser in my bedroom and recommended that I use it as a charging station. Respondent set up the CamDuck charging station in a location that provided an unobstructed view of my entire bedroom and the door to my bathroom.
4. The CamDuck charging station is black and bulky. I did not want the CamDuck charger to be visible on the dresser because of its appearance. I moved the charging station to my nightstand because the cabinet concealed the bulky charger and the items being charged. This piece of furniture has a hole in the back that allows cords to be fed through to the wall outlet which was meant to conceal cords when charging electronics. The Respondent questioned what I had done with the CamDuck charger, and I showed him that I moved the CamDuck charger to my nightstand.
5. When the Respondent set up the CamDuck charger station in January 2022 it did not seem odd to me because Respondent had already purchased similar chargers and outlet extenders for my home due to the lack of available wall outlets.
6. I primarily used the CamDuck charger for my cell phone and an Oura ring. I kept numerous other items in the same cabinet, so it was not uncommon for me to leave the cabinet door open for hours at a time.
7. In early October 2022, I stopped using my Oura ring because I was concerned that Respondent was somehow using it to track my location. Once I stopped using my Oura ring, the only thing I needed to charge in my bedroom was my cell phone. At this time, I unplugged the CamDuck charger and began using the wall outlet behind my bed to charge

my phone. The wall outlet charged my phone much faster than the CamDuck charger, and I no longer used the Oura ring, so the CamDuck charger became superfluous.

8. I believe that Lionel Lofton did not find the CamDuck charger and hidden camera during his sweep of my home in July 2023 because it was not easily visible or plugged and transmitting a signal. I did not even see this device when I initially searched my home for hidden cameras. The device had been unplugged and out of use since October 2022, and its black color made it difficult to see inside of the unlit lower cabinet.
9. Inexplicitly the Respondent concluded that I knew about this hidden camera and withheld its disclosure based off an email sent to him by an unknown individual ten (10) days after I turned the CamDuck charger over to my experts. I have absolutely no reason to delay these proceedings, nor do I benefit from their delay. The subsequent discovery of this device resulted in additional attorney and expert fees that would have been mitigated had I found this device prior to my initial filing.
10. I wholeheartedly believe the Respondent sent the email to himself to humiliate me and detract from the real issues at hand. I believe the Respondent made these accusations because he has no plausible defense for placing hidden cameras inside my home. I do not know anyone by the name of James Nolan. I have never engaged in the sort of activities described in the email that was received by Respondent at an email address that the Respondent only recently began using.
11. If the email correspondence received by Respondent was accurate, I would have engaged in the activities described prior to October 2022 when the CamDuck charger was still in use. Respondent would have the court believe that thirteen (13) months later, I provided this previously unknown third party with Respondent's email address despite knowing that

any correspondence would be produced and subsequently viewed by all attorneys involved in this matter.

12. The Respondent has tracked my every move since June 2022, and freely admits he has been using hidden cameras to watch me since 2013. To this day, the Respondent continues to monitor my location using GPS trackers. On October 27, 2023, a GPS tracker was found in my driveway when Respondent's private investigator inadvertently left it behind after he switched out the tracker with one that had a fresh battery. I assume there is an active GPS tracker on my vehicle right now, but I am tired of searching for them and have nothing to hide. If I had ever been involved with a "James Nolan" his existence would certainly be known to the Respondent. If there was any shred of truth to the allegations contained in the email submitted by Respondent, I am positive Respondent would have already brought these issues to the court's attention.

13. The Respondent alleges that the stay in the lower court is not in the best interests of our children due to the lack of a holiday schedule and requirement to confer on important decisions affecting our children. Respondent is intentionally vague about the effect of the current stay because it does not affect our children. Currently the Respondent and I share custody and have a week on – week off parenting schedule. Our present schedule provides Respondent with Thanksgiving, New Years Eve, and New Years Day. I am scheduled to have the Christmas holiday which is appropriate because Respondent had the children for Christmas in 2022. We are well within our rights to modify the existing parenting schedule, but Respondent has not raised any concerns or requested we deviate from the existing schedule.

14. Respondent failed to cite any pressing matter affecting our children because none exists.

Aside from me wanting to hire a tutor for one of my children and the Respondent indicating he would not participate during his parenting time, there are no significant child-related issues that have been raised or need to be addressed.¹

15. Respondent falsely claimed he was solely responsible for childcare costs, and that he could no longer send our daughter to preschool. Respondent never informed the school our daughter would no longer attend and objected to formally withdrawing her from preschool.² I reimbursed Respondent for childcare expenses and requested access to the online portal to pay her tuition. Respondent has repeatedly denied me access to the online tuition portal.³ Apparently, the Respondent now has the means to pay this expense and has offered to cover my portion of these costs until a final resolution of this matter.⁴

16. The Respondent also indicated that I am not paying the Guardian *ad Litem*, and the stay needs to be lifted to enforce the Order appointing the Guardian *ad litem*. This claim is also false because I entered into a payment agreement with the Guardian *ad litem*. The Respondent and his attorneys have incessantly emailed the Guardian *ad litem* on an almost daily basis to increase her fees to a point that I could no longer pay. Respondent was successful; however, I proactively contacted the Guardian *ad litem*, informed her of my situation, and negotiated a payment plan.

17. I am positive that the Respondent set up the CamDuck charger inside of my bedroom. I had no idea the CamDuck charger had a hidden camera and a recording device until I

¹ See Our Family Wizard messages between Petitioner and Respondent dated October 30, 2023 and attached hereto as **Exhibit A**.

² See Our Family Wizard messages between Petitioner and Respondent dated November 12-14, 2023 and attached hereto as **Exhibit B**.

³ See **Exhibit B**.

⁴ See **Exhibit B**.

discovered it on November 1, 2023. Prior to my dealings with John Baumgarner, I would not even have known what to look for to determine whether the device had a hidden camera. I have never downloaded any software or application to view the images on the CamDuck charger, nor I do know what type of software or application is required to view those images.

18. Nevertheless, the Respondent is the only person who has had unsupervised access to my home. Prior to a family trip to North Carolina in late May 2022, I frequently allowed Respondent to watch the children at my home while I left to go exercise or run errands.
19. Respondent claimed he purchased the CamDuck charging station for the McGee Law Firm but chose not to produce any corroborating evidence of video he captured while it was located at the office. I have never seen the CamDuck charger at the law firm and firmly believe it was set up at McCutchen Street shortly after it was purchased by Respondent.
20. If the camera was set up at our law firm, but then went missing as Respondent claims, he could have looked at the last available footage to determine who unplugged the device. Instead, the Respondent would have the court believe that an expensive device with recordings of possible attorney-client privileged communications went missing, and Respondent did nothing to determine what happened to that device.
21. While I do not believe this device was ever located at the McGee Law Firm, the Respondent stated that he has used other outlet extenders with hidden audio and visual capabilities inside our office. I am a partner of McGee Law Firm, but the Respondent never informed me there were hidden cameras with audio capabilities inside of our office. I do not believe Respondent ever informed our employees that the office contained hidden cameras. I do

not believe Respondent informed the attorneys who sublet office space from McGee Law Firm that their conversations inside of the office were being monitored.

22. I have serious concerns about the Respondent placing hidden cameras inside of our office.

We frequently held depositions and mediations at McGee Law Firm, and Respondent could have used those cameras to listen to conversations between other attorneys and their clients.

23. By placing this device inside my home Respondent was also able to listen in on privileged

attorney-client discussions with my former employer. From November 2021 until July 2022, I was employed as corporate counsel for a pharmaceutical clinical research organization and oversaw the international acquisition of that company. My position was 95% remote and all my communications with my employer and outside counsel were conducted inside of McCutchen Street using Microsoft Teams. I was primarily responsible for watching the children each day after school, and because my office did not have a door, I frequently had to use my bedroom for sensitive meetings conducted via Microsoft Teams.

24. I am over the age of twenty-one (21) years and competent to testify to the matters stated

herein. I have read the foregoing paragraphs, all matters stated there are correct and true and are based upon my own personal knowledge and belief, except those alleged-on information and belief and as to those, I believe them to be true and accurate.


LINDSAY MCGEE

Sworn and subscribed before me
this 17th day of November, 2023


NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: My Commission
Expires Jul 24, 2023

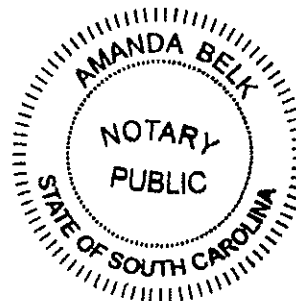


EXHIBIT A

(Our Family Wizard message dated October 30, 2023)

Message Report

OurFamilyWizard

Generated: 11/15/2023 at 10:31 PM by Lindsay McGee

Number of messages: 2

Timezone: America/New_York

Parents: Lindsay McGee, Justin McGee

Child(ren): A [REDACTED] McGee, O [REDACTED] McGee, H [REDACTED] McGee

Third Party: Liz Stringer

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 2

Sent: 10/30/2023 at 04:09 PM
From: Lindsay McGee
To: Justin McGee (First Viewed: 10/30/2023 at 04:10 PM)
Subject: H [REDACTED] Data Conference, iReady scores and tutoring
Attachments: HMM_i_Ready_results_and_classwork.pdf (2 MB)

Attached you will find H [REDACTED]'s iReady scores and some classwork to review. I attended the Data Conference with H [REDACTED]'s teacher today and discussed these documents.

H [REDACTED] desperately needs tutoring. I found and contacted a tutor that is OG certified as recommended by Cadie at Tidewater Neuropsych. She charges \$60 an hour and we are still hammering out a date and time. It will be much easier now that soccer is over.

H [REDACTED] also needs OT PT.

I am going sign him up for tutoring and wonder if you would like for him to participate on your parenting weeks? I will need to alternate therapies (tutoring, David and OT) due to the cost and my current financial situation. I may just ask to cut back with David to 1x per month vs. 2.

Please let me know your thoughts and preference as to tutoring.

Message 2 of 2

Sent: 10/30/2023 at 04:27 PM
From: Justin McGee
To: Lindsay McGee (First Viewed: 10/30/2023 at 04:32 PM)
Subject: Re: H [REDACTED] Data Conference, iReady scores and tutoring

I cannot assist financially with anything additional for the kids. I've already canceled all David sessions for my time. I cannot and will not be paying for O'Quinn and AJM will not be attending during my time. I have not paid and cannot pay the health insurance premium. I have not paid and cannot pay the Cub Scouts registration fees for the boys that is due this month. I can no longer pay the expenses of the law firm and expect creditors will begin pursuing us personally for those debts.

Quite frankly, you can't afford these things either. Have you paid the GAL? Did you pay the 2021 IRS liability that is incurring fees and penalties?

I will never understand the choices you've made, but we're all about to feel the full consequences of them.

EXHIBIT B

(Our Family Wizard messages dated November 12-14, 2023)

Message Report

➤ OurFamilyWizard

Generated: 11/15/2023 at 10:48 PM by Lindsay McGee
Number of messages: 1
Timezone: America/New_York
Parents: Lindsay McGee, Justin McGee
Child(ren): ~~Alexis~~ McGee, ~~Olivia~~ McGee, ~~Harlow~~ McGee
Third Party: Liz Stringer

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 11/14/2023 at 07:17 PM
From: Justin McGee
To: Lindsay McGee (First Viewed: 11/14/2023 at 07:17 PM)
Subject: Re: O'Quinn

I will pay for O'Quinn and we can figure out how it gets allocated later. Please take her back to O'Quinn as soon as she's feeling better.

On 11/12/2023 at 02:37 PM, Lindsay McGee wrote:

To: Justin McGee (First Viewed: 11/12/2023 at 02:42 PM)
Subject: Re: O'Quinn

It counts as a cash advance. I did this and my credit limit was as lowered because of too many cash advances.

Real world hypothetical- Mr Loser uses his credit card to Venmo \$25 to his lady (or male) friend on Only Fans. The amount on his credit card will appear as \$27.50 to account for the cash advance fee.

On 11/12/2023 at 01:51 PM, Justin McGee wrote:

To: Lindsay McGee (First Viewed: 11/12/2023 at 02:33 PM)
Subject: Re: O'Quinn

You can use a credit card to pay me on Venmo.

On 11/12/2023 at 01:50 PM, Lindsay McGee wrote:

To: Justin McGee (First Viewed: 11/12/2023 at 01:50 PM)
Subject: Re: O'Quinn

This would be a different story if you gave me access to the account to pay with my own credit card. You are using credit and expecting me to pay you cash. You refused to allow me access to the payment portal. I don't have the cash.

Ok, then you can pick her up from school on Friday.

On 11/12/2023 at 01:37 PM, Justin McGee wrote:

To: Lindsay McGee (First Viewed: 11/12/2023 at 01:48 PM)
Subject: Re: O'Quinn

I do not agree to "withdraw" her. We signed a contract.

What I really need is for you to reimburse me expenses and pay your portion of her childcare.

On 11/12/2023 at 01:12 PM, Lindsay McGee wrote:

To: Justin McGee (*First Viewed: 11/12/2023 at 01:12 PM*)

Subject: O'Quinn

Have you notified Ms. Rigtrup and/or Sharon about withdrawing ~~As~~? If not, would you like for me to notify them?

Going forward, we can just plan on exchanging ~~As~~ at EF. My assumption is that the parent with the Friday overnight will still be responsible for picking up the boys from school. Please let me know if you have a different understanding.

RECEIVED

Nov 20 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 REPLY TO RETURN TO PETITIONER'S MOTION TO
SUPPLEMENT THE RECORD on Respondent, by email addressed below:

Mr. Jerry N. Theos
jerry@theoslaw.com

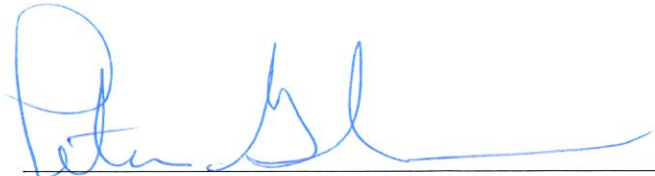
Ms. Marie-Louise Ramsdale
ml@ramsdalelaw.com

Ms. Elizabeth J. Stringer
liz@stringerlaw.us

Mr. Matthew Abee
Matt.abbe@nelsonmullins.com

Ms. Morgan Spires
Morgan.spires@nelsonmullins.com

Richard G. Whiting
Dick.whiting@whitinglaw.com



Peter G. Currence

McDougall, Self, Currence & McLeod, LLP
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Post Office Box 90860
Columbia, SC 29290-1860
(803) 776-3130

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November 3, 2023



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P.O. Box 2197, Sumter, SC 29151-2197

(803) 778-5062 phone; (803) 778-6908 fax

November 20, 2023

RECEIVED

Nov 20 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 REPLY TO RETURN TO PETITIONER'S 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