

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
: STIPULATION
UNITED STATES OF AMERICA :
: S2 17 Cr. 548 (PAC)
- v. - :
: JOSHUA ADAM SCHULTE,
: Defendant. :
: - - - - - x

IT IS HEREBY STIPULATED AND AGREED by and among the United States of America, by GEOFFREY S. BERMAN, United States Attorney for the Southern District of New York, David W. Denton, Jr., Sidhardha Kamaraju, and Matthew Laroche, Assistant United States Attorneys, of counsel, and Joshua Adam Schulte, the defendant, by and with the consent of his counsel, Sabrina Shroff, Esq., Edward Zas, Esq., and James Branden, Esq., that:

1. If called as a witness, a representative of Google, Inc. ("Google") with knowledge of the matter would testify that GX 1305-1 through 1305-10 are true and correct copies of documents from the account joshschultel@gmail.com, including subscriber information, emails, and Google searches conducted and websites visited by the user of that account, and the date and time those searches occurred and the websites visited search history, were made at or near the time by, or from information transmitted by, a person with knowledge of the matters set forth



in the records; they were kept in the course of a regularly conducted business activity; and it was the regular practice of that business activity to maintain the records.

2. If called as a witness, a representative of Amazon.com, Inc. ("Amazon") with knowledge of the matter would testify that GX 1306-1 contains true and correct copies of documents from Amazon associated with Amazon user account joshschultel@gmail.com, which were made at or near the time by, or from information transmitted by, a person with knowledge of the matters set forth in the records; they were kept in the course of a regularly conducted business activity; and it was the regular practice of that business activity to maintain the records.

3. If called as a witness, a representative of Automattic, Inc. ("Automattic") with knowledge of the matter would testify that GX 1301-1 through 1301-4B are true and correct copies of documents from Automattic associated with Automattic profile <https://en.gravatar.com/joshschultel>, which includes the WordPress websites joshschulte.wordpress.com, presumptionofslavery.wordpress.com, and presumptionofinnocence.net, and which were made at or near the time by, or from information transmitted by, a person with knowledge of the matters set forth in the records; they were kept in the course of a regularly conducted business activity;

and it was the regular practice of that business activity to maintain the records.

4. If called as a witness, a representative of Buffer, Inc. ("Buffer") with knowledge of the matter would testify that GX 1302-1 is a true and correct copy of documents from Buffer associated with the Buffer account with the user ID 5b8c7b5804c2e71709f92901 and associated with email address freejasonbourne@protonmail.com, and which were made at or near the time by, or from information transmitted by, a person with knowledge of the matters set forth in the records; they were kept in the course of a regularly conducted business activity; and it was the regular practice of that business activity to maintain the records.

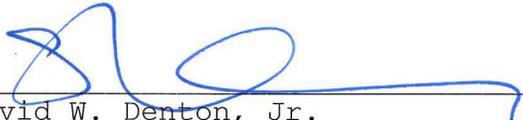
5. If called as a witness, a representative of Twitter, Inc. ("Twitter") with knowledge of the matter would testify that GX 1304-1 through 1304-3 are true and correct copies of documents from the Twitter account @freejasonbourne, and which were made at or near the time by, or from information transmitted by, a person with knowledge of the matters set forth in the records; they were kept in the course of a regularly conducted business activity; and it was the regular practice of that business activity to maintain the records.

6. IT IS FURTHER STIPULATED AND AGREED that this Stipulation, as Government Exhibit 3002, and Government Exhibits 1305-1 through 1305-10, Government Exhibit 1306-1, GX 1301-1 through 1301-4B, Government Exhibit 1302-1, and Government Exhibits 1304-1 through 1304-3 may be received in evidence as Government Exhibits at trial.

Dated: New York, New York
January 31, 2020

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: _____


David W. Denton, Jr.
Sidhardha Kamaraju
Matthew Laroche
Assistant United States Attorneys
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Edward Zas, Esq.
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