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THE STATE OF TEXAS §
 §
COUNTY OF HARRIS §

SEARCH WARRANT

TO THE SHERIFF OR ANY PEACE OFFICER OF HARRIS COUNTY TEXAS

GREETINGS:

WHEREAS, Complaint in writing, under oath, has been made before me by Daron Parker, a peace officer employed by the Texas Department of Public Safety, and who is currently assigned to the Texas Rangers Division, Company A, with an address of 12230 West Road, Houston, Harris County, Texas, which complaint is attached hereto and expressly made a part hereof for all purposes and said complaint having stated facts and information in my opinion sufficient to establish probable cause for the issuance of this warrant;

YOU ARE THEREFORE COMMANDED to forthwith search the place therein named, to wit:

- (1) a desktop PC, Dell Optiplex (Asset ID: P274338-001-007; Model Number: 5040; Serial Number: GKTKND2);
- (2) a laptop, Apple MacBook Pro (Model Number: A2251; Serial Number: CO2DDBHGML7J); and
- (3) a phone, Samsung (Model: SM-G973U; IMEI Number 356028100711374, Phone Number/Wireless Number Account: 832-314-6922)

owned by Harris County, Texas and assigned to **Aaron Dunn** (collectively the "Dunn Electronic Devices"),

- (1) a desktop PC, Dell Optiplex (Asset ID: P274338-001-011; Model Number: 5040; Serial Number: GKSNND2);
- (2) a laptop, Apple MacBook Air (Asset ID: P314657-001-001; Serial Number: FVFY827NJK77);
- (3) a phone, Apple (Model: iPhone X S A1920; Phone Number/Wireless Number Account: 832-329-5992; IMEI: 356174098354411; SIM: 89011003300022895900); and
- (4) a phone, Apple (Model: iPhone 8 Plus Space Gray 64 GB SO; Phone Number/Wireless Number Account: 713-906-2058; Device ID: 358688093339711)

owned by Harris County, Texas and assigned to **Wallis Nader** (collectively the "Nader Electronic Devices"),

- (1) a laptop, Dell Latitude (Asset ID: P286727-001-002; Model Number: 7480; Serial Number: D5JKFH2);
- (2) a laptop, Dell Latitude (Asset ID: S30193-001-002; Model Number: 5411; Serial Number: F49X8C3); and

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging.

93878 JM

- (3) a phone, Samsung (Model: SM-G973U; Phone Number/Wireless Number Account: 832-314-7398; IMEI: 356028100699702)

owned by Harris County, Texas and assigned to **Alex Triantaphyllis**, (collectively the "Triantaphyllis Electronic Devices")

with the authority to search for and to seize any and all evidence of the offenses of Tampering with Governmental Document and Misuse of Official Information, or that a particular person committed Tampering with Governmental Document and Misuse of Official Information, namely, any of the following:

1. any messages including but not limited to text or short message services (SMS), multimedia messaging service (MMS), electronic mail, instant messages;
2. any call history or call logs;
3. any voice messages;
4. any recordings;
5. any electronic messages;
6. any documents;
7. any files;
8. any screenshots or photographs;
9. any documents and/or evidence showing the identity of ownership and/or identity of the user(s) of said Electronic Devices;
10. any other form of communication of which said Electronic Devices are capable;
11. the data/content of any applications used to conduct Harris County business; and
12. the data/content of any applications that contain messages such as Whatsapp and Signal

(collectively the "Data")

that relates to:

- (a) the RFP titled Targeted Community Vaccine Outreach (the "Vaccine Outreach RFP");
- (b) the hiring or contracting of Felicity Pereyra and/or Elevate Strategies, LLC by Harris County, Texas;
- (c) the scope of work for Felicity Pereyra or targeted vaccine outreach or the drafting thereof;
- (d) selection and service on the Evaluation Committee for the awarding of the Vaccine Outreach RFP;
- (e) the work of the Evaluation Committee for the awarding of the Vaccine Outreach RFP;
- (f) the awarding of the contract to Elevate Strategies, LLC for the Vaccine Outreach RFP;
- (g) discussions about The University of Texas Health Science Center at Houston; or
- (h) any of the following groups of words within the quotation marks without regarding to case sensitivity, spacing, or punctuation:
 - (1) "Community outreach strategy management and oversight";

- (2) "Targeted community vaccine outreach for Harris County";
- (3) "Scope for vaccine-related community engagement";
- (4) "Strategic community outreach";
- (5) "Community outreach scope";
- (6) "Equity strategy for vaccines";
- (7) "Covid-19 data scope of work"; and
- (8) "Vaccine-related community engagement scope"

(collectively the "Subject Matter").

YOU ARE FURTHER ORDERED to have a forensic examination conducted of any devices seized pursuant to this warrant to search for the items previously listed.

HEREIN FAIL NOT and due return make hereof.

WITNESS MY SIGNATURE on this the 10 day of March A.D. 2022
at 9:39 o'clock, P.M.

Colleen Gaido
(signature)

Colleen Gaido
(print)
District Court Judge 337
Harris County, Texas

FILED
Marilyn Burgess
District Clerk
MAR 16 2022
Time: _____
By AK Harris County, Texas
Deputy

THE STATE OF TEXAS
COUNTY OF HARRIS

§
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AFFIDAVIT

I, Daron Parker, a peace officer employed by the Texas Department of Public Safety, and who is currently assigned to the Texas Rangers Division, Company A, with an address of 12230 West Road, Houston, Harris County, Texas, do solemnly swear that I have reason to believe and do believe that within

- (1) a desktop PC, Dell Optiplex (Asset ID: P274338-001-007; Model Number: 5040; Serial Number: GKTKND2);
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- (3) a phone, Samsung (Model: SM-G973U; IMEI Number 356028100711374, Phone Number/Wireless Number Account: 832-314-6922)

owned by Harris County, Texas and assigned to **Aaron Dunn** (collectively the “Dunn Electronic Devices”),

- (1) a desktop PC, Dell Optiplex (Asset ID: P274338-001-011; Model Number: 5040; Serial Number: GKSNND2);
- (2) a laptop, Apple MacBook Air (Asset ID: P314657-001-001; Serial Number: FV FY827NJK77);
- (3) a phone, Apple (Model: iPhone X S A1920; Phone Number/Wireless Number Account: 832-329-5992; IMEI: 356174098354411; SIM: 89011003300022895900); and
- (4) a phone, Apple (Model: iPhone 8 Plus Space Gray 64 GB SO; Phone Number/Wireless Number Account: 713-906-2058; Device ID: 358688093339711)

owned by Harris County, Texas and assigned to **Wallis Nader** (collectively the “Nader Electronic Devices”),

- (1) a laptop, Dell Latitude (Asset ID: P286727-001-002; Model Number: 7480; Serial Number: D5JKFH2);
- (2) a laptop, Dell Latitude (Asset ID: S30193-001-002; Model Number: 5411; Serial Number: F49X8C3);
- (3) a phone, Samsung (Model: SM-G973U; Phone Number/Wireless Number Account: 832-314-7398; IMEI: 356028100699702); and

owned by Harris County, Texas and assigned to **Alex Triantaphyllis** (collectively the “Triantaphyllis Electronic Devices”),

is evidence of the offenses of Tampering with Governmental Document and Misuse of Official Information, or that a particular person committed Tampering with Governmental Document and Misuse of Official Information, namely, in the form of:

93878

1. messages including but not limited to text or short message services (SMS), multimedia messaging service (MMS), electronic mail, instant messages;
2. call history or call logs;
3. voice messages;
4. recordings;
5. electronic messages;
6. documents;
7. files;
8. screenshots or photographs;
9. documents and/or evidence showing the identity of ownership and/or identity of the user(s) of said Electronic Devices;
10. other forms of communication of which said Electronic Devices are capable;
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that relate to:

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- (d) selection and service on the Evaluation Committee for the awarding of the Vaccine Outreach RFP;
- (e) the work of the Evaluation Committee for the awarding of the Vaccine Outreach RFP;
- (f) the awarding of the contract to Elevate Strategies, LLC for the Vaccine Outreach RFP;
- (g) discussions about The University of Texas Health Science Center at Houston; or
- (h) any of the following groups of words within the quotation marks without regarding to case sensitivity, spacing, or punctuation:
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 - (5) "Community outreach scope";
 - (6) "Equity strategy for vaccines";
 - (7) "Covid-19 data scope of work"; and
 - (8) "Vaccine-related community engagement scope."
- (a) regarding to case sensitivity, spacing, or punctuation:
 - (1) "Community outreach strategy management and oversight";
 - (2) "Targeted community vaccine outreach for Harris County";
 - (3) "Scope for vaccine-related community engagement";
 - (4) "Strategic community outreach";

- (5) "Community outreach scope";
- (6) "Equity strategy for vaccines";
- (7) "Covid-19 data scope of work"; and
- (8) "Vaccine-related community engagement scope."

YOUR AFFILIANT HAS PROBABLE CAUSE FOR SAID BELIEF BY REASON OF THE FOLLOWING FACTS:

I, Texas Ranger Daron Parker, am a certified peace officer with the Texas Department of Public Safety, Texas Rangers Division Company A. I have been a peace officer for 26 years. I have been a Texas Ranger with Company A since March of 2013. I have investigated numerous cases involving public corruption. I have executed many search warrants. Among other duties, I am responsible for the investigation of public corruption. On October 7, 2021, I was assigned to an investigation concerning the awarding of the Targeted Community Vaccine Outreach Harris County job number 21/0042 contract to Elevate Strategies, LLC ("Elevate").

I found and reviewed the public bid solicitation for the Request for Proposals titled Targeted Community Vaccine Outreach Harris County, Job Number 21/0042, provided by the Harris County Purchasing Department ("Purchasing") via Harris County BuySpeed Online. The public bid solicitation gives the bid number is 21/0042, and the description is Targeted Community Vaccine Outreach. The bid opening date is listed as March 8, 2021. The available date for public access is listed as February 19, 2021. The purchaser is listed as Shawn Venables, and the organization is listed as Harris County Purchasing Agent.

The public bid solicitation contains an attachment called 210042 RFP Package. I downloaded the attachment and found it to be a pdf titled Job No. 21/0042 Request for Proposals: Targeted Community Vaccine Outreach for Harris County. It contains the seal of the Harris County Purchasing Agent. Under the title, it states "Request for Proposals: Targeted Community Vaccine Outreach for Harris County." The document, which I will refer to as Vaccine Outreach RFP, then proceeds to lay out the rules and procedures for vendors to submit proposals to this particular public request for proposal. In the introduction, it states that "Harris County is authorized to use the competitive proposal method of procurement for this contract opportunity in accordance with 2 CFR 200.320(d). In the section titled "Schedule Summary" it states the RFP release date is February 5th, 2021 and the Proposals Submission Deadline is February 22nd, 2021. In section seven, portion A of the Vaccine Outreach RFP, the scope of services being requested is laid out, which I have reviewed. The services requested are split into four tasks:

Task 1 is labeled Community Outreach Strategy management and Oversight. The document states, in part, "the work under this task will result in a comprehensive strategic plan for the County's overall Hard-to-Reach Community Vaccine outreach campaign, as well as oversight over the implementation of this plan, once developed."

Task 2 is labeled Vaccine Adoption Data – Analysis, Mapping, and Reporting. The document states, in part, "the work under this task will result in actionable data, mapping, modeling, and tools that allow messaging and community engagement for vaccine adoption outreach to be effective as possible."

Task 3 is labeled Support Vaccine Adoption Messaging and Marketing. The document states, in part, “the work under this task will support the development of effective messaging and tools that will successfully touch hard-to-reach and low-propensity County residents regarding vaccine adoption.”

Task 4 is labeled Community-based engagement. The document states, in part, “the work under this task will result in the successful recruitment and participation of local community-based organizations, non-profits, and services providers to inform hard to-reach community about how to access the COVID-19 vaccine.”

The public bid solicitation also included an attachment labeled 210042a1. I downloaded the attachment and found it to be a pdf. It is a letter signed by Damon Harris on behalf of Harris County Purchasing Agent DeWight Dopslauf (“Dopslauf”). It carries the seal of the Harris County Purchasing Agent. The letter is in reference to Job No. 21/0042 and addressed to all vendors. It is titled Addendum No. 1 and states that “the due date has been extended from Monday, February 22, 2021, to Monday, March 8, 2021 at 2:00 p.m. CST, Houston TX.”

I have viewed a proposal tabulation from Dopslauf dated Monday, March 8, 2021, which is labeled Job No 21/0042, Targeteted [sic] Community Vaccine Outreach for Harris County. The proposal tabulation has an entry line for vendor and an entry line for received. The proposal tabulation indicates that proposals from four vendors were received by Purchasing by the deadline of March 8 2021:

1. Elevate Strategies LLC (“Elevate”),
2. The University of Texas Health Science Center at Houston,
3. National Association of Latino Elected and Appointed Officials Educational Fund (“NALEO”), and
4. Kickin Ass Takin Names, LLC DBA Texas Tool Belt.

The proposal tabulation is signed by two individuals from Purchasing and one from the Harris County Auditor’s Office, all on March 8, 2021. The signatures certify “that the companies submitted proposals by the due date and time.”

I have reviewed a scoring evaluation sheets from Purchasing that sets out the scoring by the evaluation committee members of the four proposals received. According to the scoring evaluation sheets, five individuals were tasked with scoring the four proposals: 1) Alex Triantaphyllis (“Triantaphyllis”) 2) Wallis Nader (“Nader”) 3) Aaron Dunn (“Dunn”) 4) Staci Lofton (“Lofton”), and 5) Dixie Sasu (“Sasu”). The scoring evaluation sheets asked those five individuals to score the proposals in writing on a scoring sheet based on three categories: 1) Firm Experience & Qualifications 2) Firm Capacity & Resources 3) Organization & Project Methodology. A fourth category, Price, would be completed later by Purchasing based on any best and final offers submitted. The weight given to score on each category was predetermined. Based on the scoring of all five evaluation committee members, The University of Texas Health Science Center (“UT Health”) scored the highest with a total score of 46.80%, Elevate Strategies came in second with a total score of 40.40%, Texas Tool Belt in third with a total score of 34.80%, and NAELO came in last with a total score of 23.60%.

I have viewed the Phone Directory of the Office of Harris County Judge, with an address of 1001 Preston, Suite 911, Houston TX 77002, an address I know to be in Harris County, Texas, that is marked as revised on February 8, 2021. The directory marked as revised on February 8, 2021 indicates that Dunn has the title of senior advisor for public safety and emergency management. His mobile number is listed as 832 314 6922 and his office location is listed as 410-J. The directory marked as revised on February 8, 2021 indicates that Nader has the title of Deputy Policy Director with a mobile number of 713 906 2058 and an office location of 410-H. The directory marked as revised on February 8, 2021 indicates that Triantaphyllis has the title of Deputy Chief of Staff with a mobile phone number of 832 314 7398 and an office location of 908.

I have viewed multiple emails sent and received by Lofton. Her email address is staci.lofton@phs.hctx.net, which I know to be an email domain of employees of Harris County Public Health Department. The signature of many of her emails lists her as Staci Lofton, JD, MPH, Sr. Policy Planner – Health Equity, Office of Policy and Planning. Harris County Public Health’s public website lists the Office of Policy and Planning as one of Harris County Public Health’s many offices. I have viewed multiple emails sent and received by Sasu. Her email address is dixie.sasu@phs.hctx.net, which is also an email domain of employees of Harris County Public Health Department. Her signature line lists her as Dixie Sasu, MPH, PMP Community Health Project Manager, Nutrition and Chronic Disease Prevention Division, Harris County Public Health.

I have viewed a letter that is a Harris County business record. The letter is addressed “To Whom it May Concern,” and is dated May 24, 2021. The letter states, in part, “after reviewing the proposals submitted in response to the Targeted Community Vaccine Outreach for Harris County RFP, it is the recommendation of the review committee that we award the contract to Elevate Strategies, with the maximum award amount of \$10,973,000.00.” This letter is signed by Triantaphyllis.

I have viewed a Harris County Commissioners Court staff report labeled File #: 21-2782, Agenda Date: June 8, 2021, Agenda #: 274. The first page of the staff report states it is to Harris County Commissioners Court. It states that is through Dopslauf. It states that it was prepared by Maria Rodriguez, Purchasing Coordinator, Purchasing Department. It states that it is a “request by the Office of the Purchasing Agent for approval of an award on the basis of best proposal meeting requirements and that the County Judge execute an agreement with Elevate Strategies LLC once received for targeted community vaccine outreach for Harris County for one (1) initial year with three (3) one-year renewal options (210042).” The votes of the four commissioners and Judge Lina Hidalgo (“Hidalgo”) are noted on the staff report. All voted yes, except for Commissioners R. Jack Cagle, who voted no.

The second page of the staff report states it is a supplemental item for Covid-10. It states it is in reference to Job No. 210042. It asks the members of the Harris County Commissioners Court to please approve on basis of best proposal meeting requirements and for County Judge to execute the agreement once received for Targeted Community Vaccine Outreach for Harris County with vendor Elevate. It states it was evaluated by evaluation committee and Purchasing. It states that “the County Attorney’s Office is preparing an Agreement for these services. The award is subject to execution of the Agreement.” The second page is signed by Dopslauf.

The third page of the staff report states on the top that this page is confidential until approved by commissioners court and the agreement is executed. It is titled Request for Proposals for Targeted Community Vaccine Outreach for Harris County. It states that four proposals were received from four vendors:

1. Elevate Strategies LLC (“Elevate”),
2. The University of Texas Health Science Center at Houston (“UTHSC-H”),
3. National Association of Latino Elected and Appointed Officials Educational Fund (“NALEO”), and
4. Kickin Ass Takin Names, LLC DBA Texas Tool Belt.

The third page of the staff report indicates that a best and final offer was only received from Elevate. It states the evaluation committee consisted of representatives from the County Judge’s Office, Public Health Services, and a representative from Purchasing. It states that after review of the proposals, vendor presentations, and best and final offers, the evaluation committee selected Elevate on the basis of best proposal meeting requirements and needs of Harris County. It goes on to say that “Although Elevate Strategies LLC received the second highest score, they were considered the best proposal due to their firm understanding of the requirements and the provision of a strong submission overall.” It then states that “the remaining vendors were eliminated due to the following reasons: NALEO’s proposal is focused on Latino communities rather than a whole-County approach and is primarily focused on marketing rather than direct community outreach. Although UTHSC-H received the highest score and the data analytics capabilities of UTHSC-H are high quality, the community outreach work they have provide for other projects such as Harris SAVES has not been shown to be successful. Texas Tool Belt’s proposal matches up broadly with the scope of this project; however, their proposal is missing some level of emphasis on the data analysis and targeting component of this project.” It states that the amount of the contract is \$10,973,000. It ends by stating that this project was a Request for Proposal and so evaluation and cost information is confidential until agreement is executed. After which all response may become available for public review.

I have viewed a contract titled Agreement between Harris County and Elevate signed by Felicity Pereyra (“Pereyra”), Hidalgo, and Harris County Assistant County Attorney Manasi Tahiliani on July 27, 2021. The contract is for the provision of targeted vaccine community outreach services to Harris County in accordance with the Vaccine Outreach RFP.

I have reviewed official State of Texas records related to Elevate. I have viewed Elevate’s certificate of formation filed on August 9, 2019, which indicates that Pereyra is the registered agent and manager of Elevate. I have also viewed Elevate’s Texas Franchise Tax Public Information Report filed February 20, 2020, and Pereyra is listed as the sole manager. I have also reviewed Elevate’s proposal submitted to the evaluation committee for the Vaccine Outreach RFP on March 8, 2021. Pereyra is listed as the Founder and her email is given as felicity@elevatestrategiesllc.com. The proposal is signed by her with a date of March 8, 2021, and she is listed as the authorized representative of Elevate with a company address of 216 Marshall #11 Houston, Texas 77006. The total proposal amount from Elevate on the March 8, 2021 proposal is \$19,343,500. I have also viewed a best and final offer submitted for the Vaccine Outreach RFP by Elevate on May 11, 2021. Pereyra is again listed as the founder of Elevate and the same email is given. The total proposal cost

on the best and final offer submitted by Elevate is given as \$10,973,000.00.

I have also reviewed Harris County business records that are transcripts of text messages between individuals employed in the County Judge's Office. I have reviewed the transcript of a series of text messages between Triantaphyllis, Nader, and Joe Madden ("Madden") from January 5, 2021 through January 7, 2021. The Phone Directory of the Office of Harris County Judge, with an address of 1001 Preston, Suite 911, Houston TX 77002, that was revised on February 8, 2021, gives Joe Madden's title as Chief of Staff & Senior Strategist. In the text messages, Nader, Triantaphyllis, and Madden discuss hiring Pereyra to work with them, but it is unclear in exactly what capacity. According to the text messages, on January 7, 2021, they decide to send a proposed scope of work for Pereyra to Hidalgo for review. They then discuss adding an additional aspect to her work. At 6:49 p.m. on January 7, 2021, Triantaphyllis texts Nader and Madden "Maybe we can add it as a data-driven part of her work." After Nader agrees, Triantaphyllis texts "OK, let me try tossing something in the Google Doc while this wraps up for another 85 minutes. Just note you'll need to re-send the draft to her." Nader responds with a thumbs up. Triantaphyllis then texts Madden and Nader "Wordy as hell but: Development and oversee a data-driven, strategic approach to leveraging promotoras and other credible community organizational and individual partners for vaccine outreach activities." Triantaphyllis then texts a link to both Nader and Madden – <https://docs.google.com/document/d/1d2VH4nljEY8NlKi9NfOdwxmUXLUN493WlcMUuBpVcOA/edit>. I know from experience that links beginning with docs.google.com are links to Google Doc documents. Triantaphyllis then texts "penultimate bullet. Just toss her the link this next time once you're good, Wallis." Nader responds "Okay."

I have reviewed the transcript of a series of texts made on January 12, 2021 between Triantaphyllis and Nader. On January 12, 2021 at 4:58 p.m. Triantaphyllis texts Nader another Google Doc link: https://docs.google.com/document/d/12HyQxftacM_pEWttwqKcsD_q2OEGgRq8lHqQ3XHUzM_o/edit?usp=sharing. He then texts "OK, I got her to agree with this scope. I made a copy (the above link) so that we can have the old doc (with her edits) for reference. So go ahead and sent it to Felicity so we can see what her thoughts are on \$\$\$." Nader then responds at 4:59 p.m. on January 12, 2021 with a hang loose emoji.

I have reviewed the transcript of a series of text messages between Triantaphyllis and Chang Chiu ("Chiu") on January 12, 2021, beginning at 5:27 p.m. According to Chiu's biography for the Office of Fair Housing and Equality Opportunity of HUD, Chiu served as a Senior Policy Advisor for Hidalgo and led policy development on, among other things, the Census 2020 project. In the messages, Triantaphyllis asks for a copy of the portions of the scope for the Census 2020 project, one of which was completed by Pereyra. Triantaphyllis then texts Chiu that "JLH wants to try something like it for vaccine equity outreach." Based on reviewing numerous text messages and emails, I believe JLH to stand for Hidalgo. Later, at 8:59 p.m. on January 12, 2021, Triantaphyllis texts Chiu "can you help me understand this? I had Chris put this together based on the scopes of the two documents: <https://docs.google.com/document/d/1yOU4D8lE4XHyLnlNJMqBVB8gaM2weW8TNsOreobNu9Q/edit?usp=sharing>. But it kind of looks like all the substance comes from the second document (unless Chris pulled the wrong stuff from the first document). Regardless, my main questions are: 1: If I just show her the stuff starting on page 2, is that comprehensive to give her an understanding of

Civis's and Felicity's roles? And if not, what other info is needed?" He states that his guess "is Felicity for Task 1 and Civis for Task 2, and then others for Tasks 3 and 4. ("I'll probably show her all four tasks in the end, but would be good to know.)" Chang Chiu responds by stating "I'd take out Chris's 1st page. And start with the 2nd. The ideal thing for what JLH is probably looking for is a combination of all 4 tasks. Without knowing all the details of what she wants, I'd think you'd want a vendor who can do a little bit of data analysis, messaging, and outreach ---- all with the goal of reaching the target community for equity. So I think it makes sense to show her all 4 tasks. Keep in mind that these RFPs got kind of scrambled. We wanted someone like Felicity from the beginning of the Census campaign, but she got sidelined because of CAG. So if JLH was impressed by what Felicity did at the end of the Census campaign, a lot of that was her working hand in hand with Civis to use the data analytics to pump out direct outreach in mail, digital, phone banking in target communities. Outreach Strategists did the coordinating among all 4 vendors – a lot of work, but maybe not what's needed for the vaccine outreach."

I have reviewed the transcript of a series of text messages between Triantaphyllis and Ashley San Miguel (San Miguel) from January 12, 2021. According to the Harris County Online Phone Directory, Ashely San Miguel is the Director of Administration at 1001 Preston, Suite 911, Houston 77002. On January 12th, 2021, at 6:29 p.m. San Miguel texts Triantaphyllis stating that he was to send Hidalgo and Rafael Lemaitre ("Lemaitre") "the scope of work for felicity and for CVID during the census." According to the Harris County Online Phone Directory, Lemaitre is the Communications Director & Senior Advisor located at 1001 Preston, Suite 911, Houston, 77002. On January 13th, 2021, at 8:51 a.m. Triantaphyllis texts back "Sent, cc'ed y'all." He then says he is locked out of his email, but that this is what he would send if he could and then sends the same link he sent Chang Chiu on January 12th, 2021: <https://docs.google.com/document/d/1yOU4D8IE4XHyLnINJMqBVB8gaM2weW8TNsOreobNu9Q/edit?usp=sharing>. He states that "Task 1 is what Felicity did. Task 2 is what Civis did. Tasks 3 and 4 were done by other people but are probably still relevant."

I have received numerous Harris County business records, including emails involving individuals employed in the County Judge's Office. I have viewed an email dated January 13, 2021, at 6:28 a.m. The email is listed as From: Nader, Wallis (County Judge's Office) [Wallis.Nader@cjo.hctx.net]. The email is listed as To: felicity@elevatestrategieisllc.com. The email is CC'ed to Triantaphyllis, Alex (County Judge's Office) [Alex.Triantphyllis]. The subject is "Covid-19 Data and Community Outreach Scope". There is a PDF attachment to the email titled "Scope of Work". The body of the email states, in part, "Let us know your thoughts and proposed budget after you've had a chance to review. Alex (copied) or I would be happy to discuss further by phone if that would be helpful." I have reviewed a copy of the PDF attachment to the email. The document "Scope of Work" contains two paragraphs that describes plans for strategic community outreach via a vaccine media campaign that is in development. One paragraph states: "Develop and oversee a data-driven, best practices —driven, strategic community outreach to reach communities and tear down barriers toward equitable distribution of vaccines and other HCPH COVID-19 services, in coordination with the communications team to build on the vaccine media campaign they are developing."

I have viewed an email sent on January 13th, 2021, at 9:59 a.m. from Pereyra to Triantaphyllis and Nader. The email, in part, states "I'm going to take a deeper look here but am also connecting

with my good friend who is running COVID intelligence for NYC just to round out my approach. Does EOD Friday work for y'all to receive proposal?" I have viewed another email sent on January 14th, 2021, 3:45 p.m. from Pereyra to Nader and Triantaphyllis. The email states "I do have some follow up questions that will help clarify the approach here. Any chance y'all are available at any point tomorrow?" I have reviewed a response email from January 14th, 2021 at 4:00 p.m. where Triantaphyllis emails Pereyra's stating he is available for a call before 10:30 a.m. and after 2 p.m. and gives his phone number as 832 314 7398.

I have viewed the transcript of a text message chain between Nader and Triantaphyllis from January 14, 2021. At 4:06 p.m. on January 14, 2021, Nader texts Triantaphyllis asking if he wants to speak with Pereyra or if she should do it, or both of them. Triantaphyllis responds that he should do it in case she asks about money.

I have viewed the transcript of a text message chain from January 14, 2021, between Hidalgo, Triantaphyllis, and Madden. On January 14, 2021, at 8:03 p.m. Hidalgo texts Triantaphyllis and Madden that she "took a stab at the scope document in the census doc. What I don't know is – whether these folks will be in charge of the data or whether Felicity can do the disparities data too – whether these folks will be in charge of operational advice, for example whether we need to have roving teams or something like that. Or if that's something that Texas policy lab and you guys and public health figure out." At 8:47 p.m. Hidalgo then sends the same link Triantaphyllis sent on January 12, 2021 to San Miguel: <https://docs.google.com/document/d/1yOU4D8IE4XHyLnINJMqBVB8gaM2weW8TNsOreobNu9Q/edit>.

I have viewed the transcript of a text message chain from January 14, 2021. On January 14, 2021, at 6:55 p.m. Nader texts Triantaphyllis asking "what's the scope she's referring to? Is she drafting a scope of work?" Triantaphyllis responds at 9:18 p.m. that he made her and that it was "for the thing she was trying to add to Felicity's scope relating to engaging community groups and stuff. She's looking for like a Census-style approach." At 9:19 p.m., Triantaphyllis texts "Probably good for campaign purpose in her mind." At 9:20 p.m., Triantaphyllis texts "But anyway, if she has some intricate picture in her head, I said F it, let's let her define it and not make more crap up later." Nader responds at 9:28 p.m. with a hang loose emoji.

I have also reviewed Elevate business records including email communications. In those records, I reviewed an email sent from: Felicity Pereyra [felicity@elevatestrategiesllc.com], to: Poonam Benakatti [poonambenakatti@gmail.com]. Poonam Benakatti is listed as the Chief of Staff in the Elevate proposal I reviewed from March 8, 2021. The email is listed as sent on January 14, 2021 at 11:38 p.m. In the body of the email, Felicity Pereyra states "Judge Hidalgo's office in Harris County just reached out to me about 1) taking over COVID 19 intelligence and analytics and 2) managing a community outreach campaign to push us close to herd immunity. They also reached out to me to do redistricting too."

I have reviewed the transcript of a text message chain from January 15, 2021. On January 15, 2021, at 10:36 a.m. Triantaphyllis texts Dunn stating "Felicity Pereyra (the person who may do the data work per the scope doc you helped put together – here's the latest version: https://docs.google.com/documents/d/12HyQxftacM_pEWttwqKcsD_q2OEGgRq8IHqQ3XHUZM

o/edit) may reach out to you with questions about how we do the COVID data work.”).

I have reviewed an email sent from Triantaphyllis, Alex (County Judge’s Office) [Alex.Triantaphyllis@cjo.hctx.net.] to Felicity Pereyra [felicity@elevatestrategiesllc.com]. The email is sent on January 15, 2021 at 4:01 p.m. The subject of the email is “Scope.” The email has a PDF attachment titled COVID-19 Data Scope of Work_01.12.21.pdf. I have also reviewed another email sent minutes later that is also from Triantaphyllis to Pereyra. The email is sent on January 15, 2021 at 4:05 p.m. The subject of the email is listed as “Equity / community engagement.” The email has two Word document attachments, one titled Initial equity strategy for vaccines.docx; and another titled Vaccine-related community engagement scope.docx.

I have reviewed the documents attached to the emails sent by Triantaphyllis to Pereyra on January 15, 2021. The document named vaccine-related community engagement scope.docx contains a document titled “Community engagement.” It contains four subsections split up into four different tasks. Task 1 is titled Community Outreach Strategy management and Oversight and states “The work under this task will result in a comprehensive strategic plan for the county’s overall Hard-to-Reach-Community Vaccine Outreach campaign, as well as oversight over the implementation of this plan, once developed.” The document continues to outline a plan to build a campaign to get people in hard to reach communities vaccinated through messaging, marketing, door to door campaigning, and outreach through local non-profits. It is broken up into four tasks: : 1) Community Outreach Strategy Management and Oversight 2) Task 2 – Vaccine Adoption Data – Analysis, Mapping, and Reporting 3) Task 3 – Support Vaccine Adoption Messaging and Marketing 4) Task 4 - Community-based engagement.

I have compared the document named vaccine-related community engagement scope.docx to the Scope of Services contained on page 23 through 25 on RFP 21/0042 Targeted Community Vaccine Outreach. While there are differences between the documents, they are substantially the same.

I have reviewed an email sent by Pereyra to Dunn on January 15, 2021 at 7:46 p.m. The subject line is COVID 19 data infra. In the body of the email, she states that she spoke with Triantaphyllis that morning about potentially joining the team to “help add more capacity to the COVID DATA analysis & CJO briefing process.” She asks Dunn if he has any time for a phone conversation to talk about “underlying infrastructure, data pipelines, pain points, etc., regarding the current process.” I have reviewed follow-up emails to this email. After discussion, Pereyra and Dunn agree to speak on Monday, January 18, 2021 at 4:00 p.m., and Dunn accepts a calendar invitation from felicity@elevatestrategiesllc.com for that date and time.

I have reviewed the transcript of a text message conversation from January 19, 2021 between Nader and Triantaphyllis. On January 19th, 2021 at 12:24 P.M., Triantaphyllis texted Nader that they “need to figure out how to mission creep Felicity’s work to include the random updates, if possible. Also, I sent her an updated version of the scope since I must have communicated incorrectly about which one to send. I sent her this one, which was not split across data and community engagement: https://docs.google.com/documents/d/12HyQxftacM_pEWttwqKcsD_q2OEGgRq8IHqQ3XHUzM o/edit?usp=sharing.”

I have reviewed the transcript of a text message conversation from January 19, 2021 between Madden and Triantaphyllis. Triantaphyllis sent Madden a text message at 7:01 p.m. on January 19, 2021, stating “This thing is a monster: <https://docs.google.com/document/d/1yOU4D8IE4XHyLnlNJMqBVB8gaM2weW8TNsOreobNu9Q/edit>. Thoughts? I kind of just want to ask Felicity to go find one or more vendors to do this and then let JLH run wild with it. It’s a ton of stuff we could go ahead and do now and other stuff we probably shouldn’t bother wasting our time trying, but she’s probably going to wan [sic] to move ahead full bore, efficiency be damned.” Madden responded at 8:30 p.m. on the same date, “Yeah please hand this off to a vendor so we don’t have to do it.”

I have reviewed the transcript of a text message conversation from January 22, 2021 between Triantaphyllis and Madden. At 11:17 a.m. on January 22, 2021, Triantaphyllis texted Madden “This bad boy is done: https://docs.google.com/document/d/1yOU4D8IE4XHyLnlNJMqBVB8gaM2weW*TNsOreobNu9Q/edit. Thoughts on: A. Sending this to procurement to advertise it and having CC approve it B. Skipping formal Purchasing as long as we get 3 bids and use the \$50k limit (unlikely to say under, though) or the emergency powers – Separately: 1. Asking Felicity (if we close her on the data stuff) for ideas on who can do this 2. My sending it around to handful of people/groups 3. Just sticking with A above, which makes this moot. And if A above, try to somehow jam this on today’s supp?” Madden responds at 11:38 a.m. stating “A but dewight doesn’t move that fast, so 2/9 court.”

I have reviewed an email from January 22, 2021, at 12:11 p.m. from Triantaphyllis to Dopslauf, with Dunn cc’ed. Triantaphyllis tells Dopslauf that he wants to “put out an RFP for expedited response, review, and selection ASAP.” The email was sent with an attachment named Vaccine-related community engagement scope (1).docx. The word document is titled Scope for vaccine-related community engagement. I have reviewed that word document. The document titled vaccine-related community engagement is substantially the same document as the word document titled vaccine-related community engagement.scope.docx previously emailed to Felicity Pereyra on January 15th, 2021.

I have reviewed an email from January 25, 2021 at 10:53 a.m. from Dopslauf responding to Triantaphyllis’ 2:15 p.m. email on January 22, 2021. Dopslauf gives a span of dates going from February 5th, 2021 through March 22nd, 2021 as being the shortest timeframe for the potential RFP if Purchasing’s guidelines are followed. He states that if a shorter timeframe is needed, then it would have to be an emergency under COVID to reduce the process.

I have reviewed an email from January 25, 2021, at 4:46 p.m. where Dunn replies to Dopslauf’s email from 10:53 a.m. on January 25, 2021, with Triantaphyllis cc’ed, stating “we can work with this timeline. We’ll be in touch soon about a staffer from HCPH who will join the committee as well. The Committee should be HCPH and CJO. Thanks for your help on this.”

I have reviewed an email chain between Triantaphyllis and Dopslauf from January 27th, 2021. Dopslauf emailed Triantaphyllis asking for a title of the RFP he is requesting. Triantaphyllis responded with an email stating “How about ‘Target Community Vaccine Outreach’.”

I have reviewed an email sent on January 29, 2021, at 8:06 a.m., by Dunn to Triantaphyllis

via Google Docs. The subject line is: Target Community Vaccine Outreach RFP. 1.29.21 – Invitation to edit. The email contains a link to a Google Doc document titled Target Community Vaccine Outreach RFP. 1.29.21 – Invitation to edit.

I have viewed an email sent on February 1st, 2021, at 11:32 a.m. by Dunn to Triantaphyllis via Google Docs with the subject line Targeted Community Vaccine Outreach RFP 1.29.21. In the body of the email, Dunn has added three actions items to the Google Doc document titled Targeted Community Vaccine Outreach RFP. 1.29.21. The action items are all assigned to @alex.triantaphyllis@cjo.hctx.net. The three action items all appear to come from Dunn. The first action item is titled “Evaluation Criteria” and states “these are boilerplate so we should suggest changes.” The second action item is titled “Firms Requirements” and states “these reflect the changes I suggested.” The third action item is titled “The anticipated contract term under this RFP is for one (1) year with a maximum of three (3) one (1) year renewal options.”

I have viewed an email sent on February 2, 2021 at 9:20 a.m. from Dunn to Triantaphyllis via Google Docs with the subject line Targeted Community Vaccine Outreach RFP 1.29.21. The body of the email indicates three action items have been resolved related to the document.

I have viewed an email sent on February 2, 2021 at 9:23 a.m. from Dunn to Dopslauf, Triantaphyllis, Lofton, and Kemi Salu. The subject line is: Re: Potential RFP related to COVID-19 vaccination. There is an attachment, which is a Google Doc titled Targeted Community Vaccine Outreach RFP.1.29.21_CJO.docx. The body of the email states: “DeWight, our suggested edits are attached.”

I have viewed the transcript of a text message conversation between Dunn and Triantaphyllis from February 4, 2021. Triantaphyllis texted Aaron Dunn at 3:47 p.m. “Is the RFP out? Want to tell Purchasing to send out the link to the RFP to Felicity and plus maybe others.” Dunn responded at 3:49 p.m., “No tomorrow. So there’s still time.” Triantaphyllis responded at 3:56 p.m. “Have them send it to: Felicity Pereyra (felicity@elevatestrategiesllc.com) Frances Valdez (frances@houstoninaction.org) Shekira Dennis (shekira@next-wave.co).

I have viewed an email from February 24, 2021, from Venables, Shawn (Purchasing) <Shawn.Venables@pur.hctx.net> at 6:29 A.m. sent to Triantaphyllis and Dunn. The subject of the email is “FW: 210042 – Targeted Community Vaccine Outreach for Harris County – Confidentiality Form for your signature/return.” There is a word document titled 210042 – PHS and CJO – G5.docx attached. The email states “You have been identified as an Evaluation Committee member for Job No. 21/0042 for Targeted Community Vaccine Outreach for Harris County. Please review the attached memo, along with the Code of Ethics, and sign/return the attached Memorandum to me at your earliest convenience. The proposals are due on Tuesday, 3/8/21 by 2:00 p.m. Once I’ve received all of the signed memo’s, I’ll transmit the proposals received on 3/8 to each of the Committee members as soon as they are received.”

I have reviewed the transcript of a text message conversation between Dunn and Triantaphyllis from February 24, 2021. On February 24, 2021, at 7:35 a.m. Triantaphyllis texted Dunn asking “why is Shawn saying they’re due 3.8?” Dunn responded at 7:40 a.m. stating “Just got this from shawn: es, [sic] I will send Alex a Confidentiality form this morning. I wanted to let you

know that the specifications for this job were advertised on time, but were not made available on the Harris County BuySpeed Online for vendors to download until this past Friday. Therefore, I have extended the due date to March 8th, 2021. If you have questions, I'll be glad to discuss with you." Alex Triantaphyllis responded at 8:26 a.m. stating "Jesus." Dunn responded at 8:27 a.m. stating "yeah wtf." Triantaphyllis stated at 8:27 a.m. "These people are extraordinarily incompetent." Dunn stated at 8:27 a.m. "looks like they fucked up." Based upon review of a calendar, the Friday before February 24, 2021, would be February 19, 2021, thus February 19, 2021 would be the first date a vendor could download the Vaccine Outreach RFP.

I have reviewed the transcript of a text message conversation between Dunn and Triantaphyllis made later on February 24, 2021. At 9:15 a.m. Dunn sent a text to Triantaphyllis stating "Ok well – I'm also very concerned that we haven't gotten any submissions yet. Do you have a list of potential vendors that Shawn can send out, that Shawn can send the project to." Triantaphyllis responded at 9:16 a.m. "yeah. The person probably didn't reach out to the 3 we mentioned. Can you draft up an email that you or I can send out to those 3 groups plus any others I think of in the meantime, for DeWight's review before you fire it off? I'm skipping Shawn. But yeah, I sent you 3 before. Felicity and two others." Dunn responded "Sure, but I was under the impression that we can't contact them directly, but yeah I'll do that." Triantaphyllis responded "We did for surveillance you'll recall, with DeWight's approval."

I have reviewed an email from February 24, 2021, at 10:26 a.m. from Dunn to Dopslauf with Triantaphyllis and Venables cc'ed. The subject line was "Draft email to potential vendors." In the body, Dunn stated that they had drafted an email to send to potential vendors and wanted to make sure it followed procurement rules before it was sent out. The potential recipients were listed as: 1) Felicity Pereyra (felicty@elevatestrategiesllc.com) 2) Frances Valdez (frances@houstoninaction.org) 3) Shekira Dennis (shekira@next-wave.co) 4) Paula Cuccaro (Paula.M.Cuccaro@uth.tmc.edu). The draft email stated: "To whom it may concern, Harris County is currently seeking bids for vendors to implement a targeted COVID-19 vaccine outreach effort, with the goal of ensuring vaccination uptake throughout Harris County, especially vulnerable and hard-to-reach communities. The selected vendor will create and oversee a community outreach strategy, analyze and report on vaccine adoption data, support ongoing messaging and marketing activities, and conduct community-based outreach and engagement. Interested vendors can find the full RFP at <https://bids.hctx.net/bso/external/bidDetail.sdo?bidId=21%2F0042&parentUrl=activeBids>. Bids on this Request for Proposals are being accepted through March 8th, 2021. Any questions about the RFP or application process can be emailed to shawn.venables@pur.hcxt.net."

I have reviewed an email from February 25, 2021 at 8:43 p.m., sent by Pereyra to Emilio Tamez. In the body of the email, Pereyra states she had just been invited to bid for Harris County's large COVID-19 outreach program (campaign) to decreased vaccine hesitancy. She stated that she has "really solid relationships in house and I feel really good about my chances in landing the project (they asked me to design the program beforehand but then were told to go to RFP), so I'm just starting to build out a team."

I have reviewed transcripts of text messages sent between Dunn, Nader, and Triantaphyllis sent and received during the time the evaluation of the Vaccine Outreach RFP responders was

happening. On April 13, 2021, on a text message between Triantaphyllis, Dunn, and Nader, Triantaphyllis asked “status of vaccine outreach RFP?” Dunn replied that there was one more meeting with a vendor and that they “are going to have to put together a modified scope for one of the proposals to bring down the price.” On April 20, 2021, Triantaphyllis texted Nader and stated “This vaccine outreach thing is getting ridiculous. We need to slam the door shut on UT and move on.” In a text between Dunn, Nader, and Triantaphyllis on May 7, 2021, Dunn asked Triantaphyllis if he could “make the outreach RFP meeting that’s happening now?” Triantaphyllis replied “No. Take it away. And don’t let UT get it.”

I have reviewed a memorandum from Dopslauf dated February 16, 2021, with the subject of “Request for Proposals (RFP) for Targeted Community Vaccine Outreach for Harris County – Job No. 21/0042,” that was signed via electronic signature on February 23, 2021, by Dunn. Directly above the signature line, the memorandum reads “Additionally, I have read the attached “Harris County Purchasing Code of Ethics,” extracted from the Harris County Purchasing Policy and Procedures Manual, and agree to conduct myself in accordance with that code of ethics. The Harris County Purchasing Policy and Procedures Manual section 1.4 Code of Ethics is attached to the third page of the memorandum. The last paragraph of the attached section of the code of ethics states, “In the event an outside consultant or contractor submits a bid or proposal on a project, of which the consultant or contract was a previous contributor, other than an open forum, then the bids or proposals from that consultant or contractor shall be disqualified on the basis of conflict of interest.”

I have viewed an identical memorandum from Dopslauf dated February 16, 2021, with the subject of “Request for Proposals (RFP) for Targeted Community Vaccine Outreach for Harris County – Job No. 21/0042, signed via electronic signature by Triantaphyllis on February 24, 2021.

I have viewed an identical memorandum from Dopslauf dated February 16, 2021, with the subject of “Request for Proposals (RFP) for Targeted Community Vaccine Outreach for Harris County – Job No. 21/0042, signed via electronic signature by Nader on March 10, 2021.

On February 3, 2022, I interviewed Dunn. Dunn confirmed that the Harris County Judge’s Office uses Google Docs to create, share, and edit documents related to the Vaccine Outreach RFP. Dunn stated that the documents are retained by Google Docs indefinitely, and that it is possible to see who has logged in and worked on a particular document. Dunn stated that the employees at the County Judge’s office use their county email address as their user name in the Google Docs application.

During the interview, Dunn stated that he created the scope of work for the Vaccine Outreach RFP. Dunn confirmed that the Microsoft Word document titled Vaccine-related community engagement scope.docx that was sent by Triantaphyllis to Pereyra, was a version of the scope of work that was used for the Vaccine Outreach RFP.

He stated that the scope of work is saved as a document in Google Docs, and that he believes that the document is still stored in Google Docs. Dunn stated that both he and Triantaphyllis revised the scope of work to create the final version that was ultimately included in the Vaccine Outreach RFP. Dunn denied knowing that Nader and Triantaphyllis had communicated with Pereyra about the

scope of work for the Vaccine Outreach RFP or shared it with her prior to the RFP being released publicly. Dunn confirmed in his opinion that would be inappropriate. He admitted to electronically signing the evaluation committee memorandum.

On February 23, 2022, I interviewed Dopslauf. Dopslauf informed me that Purchasing Department memorandum sent to Triantaphyllis, Dunn, and Nader to sign is a stock form sent by the purchasing department sent to all evaluation committee members prior to Purchasing sending out vendor response documents to the valuation committee members. He stated that the Code of Ethics section is sent attached to the memorandum for their review. He stated a signed copy from the evaluation committee member is taken by the buyer for the Purchasing Department and then the signed copy is kept by the Purchasing Department for their records. He stated that the signed copies from Triantaphyllis, Dunn, and Nader related to the Targeted Community Vaccine Outreach RFP are all currently kept in the records of the Purchasing Department of Harris County. He stated that Dunn, Nader, and Triantaphyllis had all served on at least five evaluation committees.

On February 24, 2022, I spoke with Dopslauf again. He stated that he was unaware and did not believe Venables was aware that Pereyra had helped design the scope of work for the Vaccine Outreach RFP. He stated if Pereyra did help design the scope of work, then anyone who knew that should have notified Venables. He stated that Elevate would have been subsequently disqualified. Dopslauf stated that he had seen a copy of the document Vaccine-related community engagement scope.docx that was emailed by Triantaphyllis to Pereyra on February 15, 2021. He agreed that it appeared to be substantially similar to the scope of work that was contained within the Vaccine Outreach RFP.

I reviewed records from the Harris County Judge's Office listing all of the Harris County electronic devices assigned to Dunn, Nader, and Triantaphyllis from January 1, 2019, through March 1, 2022, including Asset ID numbers, descriptions, model numbers, serial numbers, user information, wireless number account, wireless user names, IMEI, and SIM. I know from training and experience that an IMEI stands for International Mobile Equipment Identity and is a unique number for cellular devices. According to those records, the following devices:

1. a desktop PC, Dell Optiplex (Asset ID: P274338-001-007; Model Number: 5040; Serial Number: GKTKND2);
2. a laptop, Apple MacBook Pro (Model Number: A2251; Serial Number: CO2DDBHGML7J); and
3. a phone, Samsung (Model: SM-G973U; IMEI Number 356028100711374, Phone Number/Wireless Number Account: 832-314-6922)

are owned by Harris County, Texas and assigned to **Dunn** (collectively the "Dunn Electronic Devices"), and the following devices:

1. a desktop PC, Dell Optiplex (Asset ID: P274338-001-011; Model Number: 5040; Serial Number: GKSNNND2);
2. a laptop, Apple MacBook Air (Asset ID: P314657-001-001; Serial Number: FVIFY827NJK77);
3. a phone, Apple (Model: iPhone X S A1920; Phone Number/Wireless Number Account: 832-329-5992; IMEI: 356174098354411; SIM: 89011003300022895900);

4. a phone, Apple (Model: iPhone 8 Plus Space Gray 64 GB SO; Phone Number/Wireless Number Account: 713-906-2058; Device ID: 358688093339711); and

are owned by Harris County, Texas and assigned to **Nader** (collectively the “Nader Electronic Devices”), and the following devices:

1. a laptop, Dell Latitude (Asset ID: P286727-001-002; Model Number: 7480; Serial Number: D5JKFH2);
2. a laptop, Dell Latitude (Asset ID: S30193-001-002; Model Number: 5411; Serial Number: F49X8C3);
3. a phone, Samsung (Model: SM-G973U; Phone Number/Wireless Number Account: 832-314-7398; IMEI: 356028100699702); and

are owned by Harris County, Texas and assigned to **Triantaphyllis** (collectively the “Triantaphyllis Electronic Devices”).

I have reviewed numerous transcripts of text messages, sent and received from the cell phones listed above, that are relevant to my investigation. It is clear from these messages, some of which were discussed above, that Dunn, Triantaphyllis, and Nader regularly use the above listed equipment to conduct county business. Harris County Personnel Policies and Procedures (the “Policies”) state an employee has no expectation of privacy in the workplace. Paragraph 7.022 of the Policies states as follows – “Assume that what you do while on duty or using County equipment is not private.” Additionally, the Policies state specifically in section 7.01, that the Section 7 County Property and Electronic Services Policy includes “new technologies as they emerge including but not limited to, computers, emails, telephones, cell phones, tablets, voicemail, fax machines, copiers, radios and wireless devices, wire services, and on-line service, including County Wi-Fi and the Internet, that are: accessed using County computer equipment or your own, via County-paid access methods.” (emphasis as written).

I reviewed records from Harris County Universal Services. The records show that Triantaphyllis used a laptop computer with the device name HCCJ0F49X8C3 and serial number F49X8C3. The records show that on February 23rd, 2022, the device was connecting with an IP Address of 10.2.17.92 and had a current location of 1001 Preston, Houston, Harris County, Texas, which I know to be the Harris County Administration Building. I looked up the device on dell.com/support/home/en-us and identified the device as a Dell Latitude 5411.

I know based on training and experience that smart cellular phones such as the cellular phones assigned to Nader, Triantaphyllis, and Dunn are capable of a wide array of functions and services in addition to their use as cellular communication devices. They are capable of receiving, sending, or storing electronic data. I also know based on training and experienced that smartphones, laptops and computers can contain the following electronic data and are able to be recalled later through forensic analysis:

1. Photographs/videos;
2. Text or multimedia messages (SMS and MMS);
3. Call history or call logs;
4. E-mails,

5. Instant messaging, or other related forms of communication
6. Internet browsing history;
7. Global Positioning System (GPS) data;
8. Contact information including e-mail addresses, physical addresses, and phone numbers;
9. Voicemail messages or telephone recordings
10. Audio/video recordings sent or received by the device
12. Stored Documents
13. Computer files or fragments of files;
14. Tracking data and way points

I know from training and experience that photographs, videos, messages, call logs, contact lists, internet browser histories, email account information, documents, and the other above categories of electronic data stored on cellular phones, laptops, and computers, such as the ones identified here, can be used to identify the user and possessor of an electronic device on particular dates and times. This data is likely to reveal motive, absence of mistake, identity, and other material evidence related to criminal conduct.

This data evidence is usually placed in electronic storage on the cellular device, laptop, or computer and a forensic search of a device's file storage, memory, and application data can find all of the data listed above stored on an electronic device, as described above (1-14).

I also know from training and experience that people are rarely not in possession of their cellular telephone, and that the information stored on such phones often provides a digital record of their activities. As noted by the Supreme Court in *Riley v. California*, "nearly three-quarters of smart phone users report being within five feet of their phones most of the time," and that "many of the more than 90% of American adults who own a cell phone keep on their person a digital record of nearly every aspect of their lives." *Riley v. California*, 573 U.S. 373, 375 & 395 (2014), citing *Harris Interactive, 2013 Mobile Consumer Habits Study* (June 2013).

I know from training and experience that all of the electronic devices sought by this warrant are capable of being connected to the internet, using Google Docs, and downloading and storing Google Docs in an electronic format. I know from training and experience that all of the above electronic devices are capable of running messaging applications, such as Messenger, Messages, and WhatsApp, and sending, receiving, and storing text messages by using messaging applications.

I have viewed the address for the Office of Harris County Judge Lina Hidalgo on the Harris County website cjo.harriscountytexas.gov/Contact. The address is listed as 1001 Preston, Houston, Harris County, Texas. I know from experience this is the Harris County Administration Building that houses several different Harris County departments. I know from experience that employees of the Office of Harris County Judge Lina Hidalgo, including Dunn, Nader, and Triantaphyllis, usually have offices within the Harris County Administration Building. During the pandemic, many Harris County employees, including employees of Harris County Judge Lina Hidalgo worked from home and locations outside of the physical office.

I have viewed the Phone Directory located online at <https://webapps.harriscountytexas.gov/PhoneDirectory/> for the Harris County Judge's Office on

March 3, 2022. Triantaphyllis is listed as the chief of staff and his address is listed as 1001 Preston, Suite 911, Houston 77002. Nader is listed Policy Director and her address is listed as 1001 Preston, Suite 911, Houston 77002. Dunn is listed as Senior Advisor for Public Safety and Emergency Management, and his office is listed as 1001 Preston, Suite 410, Houston 77002.

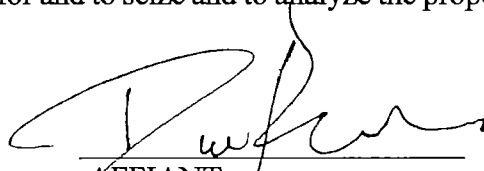
I have reviewed ten Harris County Judge's Office Phone Directories from the Harris County Judge's Office with dates ranging from January 4, 2019, through March 1, 2022. All ten Harris County Judge's Office Staff Phone Directories list the address of the Harris County Judge's Office as 1001 Preston, Suite 911, Houston, Texas, 77002, which I know to be located in Harris County, Texas. On the Harris County Judge's Office Staff Directory marked as revised on March 1, 2022, the phone number for Nader is listed as 713-906-2058, Dunn is listed as 832-314-6922, and Triantaphyllis is listed as 832-314-7398. Nader's office is listed as 908, Dunn is listed as 410-J, and Triantaphyllis is listed as 904. On the Office of Harris County Judge Phone Directory marked as revised on November 15, 2021, Nader, Dunn, and Triantaphyllis all have the same phone numbers and offices listed as the directory revised on March 1, 2022. On the Office of Harris County Judge Phone Directory marked as revised on February 8, 2021, Nader, Triantaphyllis, and Dunn all have the same number listed as the directory from March 1st, 2022, but Triantaphyllis and Nader have different offices. On the Office of Harris County Judge Phone Directory marked as revised on February 8, 2021, Triantaphyllis is listed as Deputy Chief of Staff and Nader is listed as Deputy Policy Director. In the March 1, 2022 directory, Triantaphyllis is listed as Chief of Staff and Nader is listed as Policy Director.

Therefore, I believe that within the Dunn Electronic Devices, Nader Electronic Devices, and Triantaphyllis Electronic Devices are communications and files that will show that through e-mail and phone conversations on January 13, 2021, through January 24, 2021, Dunn, Nader, and Triantaphyllis obtained non-public information due to their employment at the Harris County Judge's Office, and that the information disclosed to Pereyra pertained to an ongoing competitive situation and the release of the information harmed Harris County by providing an advantage to a competitor in a particular ongoing competitive situation, and they shared this non-public information with Pereyra aiding her in obtaining a pecuniary interest in the contract for Targeted Community Vaccine Outreach, committing misuse of official information.

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The electronic data will also show that when Dunn, Triantaphyllis, and Nader signed their memoranda on February 23, 2021, February 24, 2021, and March 10, 2021, respectively, agreeing to conduct themselves in accordance with the Purchasing Code of Ethics. Dunn, Nader, and Triantaphyllis presented their respective memorandum to Purchasing and each used their memorandum to ensure their inclusion on the evaluation committee for the Vaccine Outreach RFP. Thus, all three made and presented false statements in a governmental record and committed tampering with governmental record.

WHEREFORE, PREMISES CONSIDERED, your affiant respectfully requests that a warrant issue authorizing your affiant, or any other peace officer of Harris County, Texas, to search the contents of the Dunn Electronic Devices, Nader Electronic Devices, and Triantaphyllis Electronic Devices with the authority to search for and to seize and to analyze the property and items set out earlier in this affidavit.



AFFIANT

Sworn to and Subscribed before me on this the 10 day of March, A.D. 2022.



(signature)

Collin Grido

(print)
District Court Judge
Harris County, Texas

FILED
Marlyn Burgess
District Clerk
MAR 16 2022
Time: _____
By AK Harris County, Texas
Deputy

THE STATE OF TEXAS

§

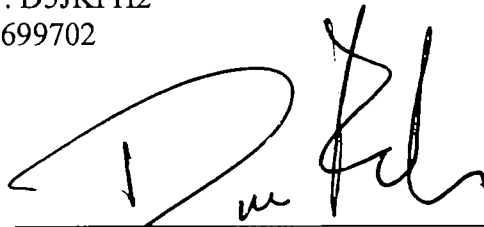
RETURN AND INVENTORY

COUNTY OF HARRIS

§

The undersigned, being a peace officer under the laws of the State of Texas, certifies that the foregoing warrant came to hand on the day it was issued and that it was executed on the 11th day of March, 2022, by making the search directed therein and seizing during the search the following described property:

- (1) An Apple MacBook Pro Serial Number: CO2DDBHGML7J
- (2) a Samsung Phone IMEI Number 356028100711374
- (3) an Apple iPhone 8 device ID: 358688093339711
- (4) a Dell Latitude laptop serial number: D5JKFH2
- (5) a Samsung phone IMEI: 356028100699702



OFFICER EXECUTING PROCESS

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