

February 16, 2022

Lori Bird  
General Counsel  
Scottsdale Unified School District  
8500 East Jackrabbit Road  
Scottsdale, Arizona 85251

RE: Scottsdale Unified School District Investigation

Dear Ms. Bird,

This letter will serve to memorialize the results of my forensic investigation of Scottsdale Unified School District's ("SUSD") electronic devices as they relate to accessing the Google Drive folder of interest.

Between November 18, 2021, and January 23, 2022, the SUSD email server and four personal computers issued to administrative employees were forensically preserved by Loehrs Forensics. Using specialized forensic software, a byte for byte search was executed throughout the SUSD email server and SUSD-issued personal devices for any activity related to the Google Drive folder of interest with unique identifier *1RFzYZlmmwucw2hv21NPCbauJ-76ujEws*. These forensic searches include:

- Allocated (non-deleted) user data such as emails, attachments, and documents saved to user-accessible areas on the computer.
- Software data such as logs (e.g., Exchange, Outlook), web browsing history (e.g., Safari, Chrome, Edge), chats (e.g., Teams, Slack), and data associated with installed third-party applications (e.g., Google Drive).
- Data temporarily cached to the device such a memory, cookies, and temporary internet files. "Cached" data refers to data automatically created by the system and software often unbeknownst to the user and inaccessible to the user without specialized knowledge and tools.
- Hidden and protected system data such as event logs, files opened and viewed, and Windows registry keys. This is data recorded by the operating system about how the device is being used.
- Deleted data such as unallocated space and lost or orphaned files that are only accessible using sophisticated forensic software. This process reconstructs all the data types described above that has been deleted by the user, software, and the system.

As a result of these searches, it is my expert opinion that no forensic evidence exists to support allegations that the email server or the personal devices were used to create, access, modify, or share the Google Drive folder with unique identifier *1RFzYZlmmwucw2hv21NPCbauJ-76ujEws* for all the reasons stated below.

#### **A) Microsoft Exchange Server**

SUSD manages a Microsoft Exchange server to host all administrative and staff email accounts (i.e., @susd.com). The forensic analysis of the exchange server revealed the following:

- The SUSD Exchange Server has been active since June 14, 2019, when the server's operating system was installed, and used through at least November 22, 2021, when the server was last written prior to being preserved by Loehrs Forensics. This forensic evidence confirms that the email server produced by SUSD contains activity within the date range of interest between July 2020 and November 2021.
- The SUSD Exchange Server contains over 4.9TB (i.e., 4,900GB) of data including over a million email messages across more than 6,200 mailboxes. These mailboxes were classified as "Administration", "School Office", "Service Account", "Technology", "Staff A-Z", and the "Archive" databases. This establishes that the Exchange Server contains a consistent volume of data for what would be expected of an email server hosting thousands of mailboxes.
- A byte for byte forensic search throughout allocated and unallocated space on SUSD's email server for all references to Google Drive folders revealed approximately 98,000 hits including email messages and email logs. This forensic evidence establishes that thousands of emails sent and received by SUSD's staff did contain links to Google Drive folders that were being shared.
- A byte for byte forensic search throughout allocated and unallocated space on SUSD's email server for all references to the specific Google Drive folder of investigative interest with unique identifier "1RFzYZlmmwucw2hv21NPCbauJ", including the 98,000 references to Google Drive folders, revealed no hits within the date range of interest. As such, no forensic evidence was located that emails were exchanged using SUSD's email server to share links to the Google Drive folder of investigative interest.

## B) Scott Menzel's MacBook Pro

SUSD issued a personal computer to administrative employee Scott Menzel. The forensic analysis of Menzel's SUSD computer revealed the following:

- The SUSD computer issued to Menzel was used from approximately January 26, 2021, when the operating system was installed and the *smenzel* user account was created, through January 21, 2022, when the computer was last used prior to being preserved by Loehrs Forensics. This forensic evidence confirms that this SUSD computer was used by Menzel and activity would exist within the date range of interest beginning January 2021 through November 2021.
- A byte for byte forensic search throughout allocated and unallocated space (i.e. deleted data) on Menzel's computer for all references to a Google Drive revealed approximately 1,294 hits including web history and emails. This forensic evidence establishes that Menzel did access Google Drive folders using the Safari and Google Chrome browsers installed on this computer and sent and received emails using this computer which contain links to Google Drive folders that were being shared.
- A byte for byte forensic search throughout allocated and unallocated space on Menzel's computer for all references to the specific Google Drive of investigative interest with unique identifier "1RFzYZlmmwucw2hv21NPCbauJ", including the 1,294 references to Google Drive folders, revealed no hits. As such, no forensic evidence was located that this SUSD computer was used to create, modify, access, or share links to the Google Drive folder of investigative interest.

## C) Zach Lindsey's HP EliteBook

SUSD issued a personal computer to administrative employee Zach Lindsey. The forensic analysis of Lindsey's SUSD computer revealed the following:

- The SUSD computer issued to Lindsey was used from approximately January 5, 2021, when the operating system was installed and the *zlindsey* user account was created, through December 17, 2021, when the computer was last written prior to being preserved by Loehrs Forensics. This forensic evidence confirms that this SUSD computer was used by Lindsey and activity would exist within the date range of interest beginning January 2021 through November 2021.

- A byte for byte forensic search throughout allocated and unallocated space (i.e. deleted data) on Lindsey's computer for all references to a Google Drive revealed approximately 8 hits including cached data from the Microsoft Edge browser. This forensic evidence establishes that Lindsey's SUSD computer has been associated with Google Drive folders.
- A byte for byte forensic search throughout allocated and unallocated space on Lindsey's computer for all references to the specific Google Drive of investigative interest with unique identifier "1RFzYZlmmwucw2hv21NPCbauJ", including the 8 references to Google Drive folders, revealed no hits. As such, no forensic evidence was located that this SUSD computer was used to create, modify, access, or share links to the Google Drive folder of investigative interest.

#### D) Julie Cienowski's HP EliteBook

SUSD issued a personal computer to administrative employee Julie Cienowski. The forensic analysis of Cienowski's SUSD computer revealed the following:

- The SUSD computer issued to Cienowski was used from approximately March 25, 2021, when the operating system was installed and the *jcieniawski* user account was created, through December 17, 2021, when the computer was last written prior to being preserved by Loehrs Forensics. This forensic evidence confirms that this SUSD computer was used by Cienowski and activity would exist within the date range of interest beginning March 2021 through November 2021.
- A byte for byte forensic search throughout allocated and unallocated space (i.e. deleted data) on Cienowski's computer for all references to a Google Drive revealed approximately 222 hits including data from the Google Chrome and Microsoft Edge browsers. This forensic evidence establishes that Cienowski did access Google Drive folders using the Internet browsers installed on this SUSD computer.
- A byte for byte forensic search throughout allocated and unallocated space on Cienowski's computer for all references to the specific Google Drive of investigative interest with unique identifier "1RFzYZlmmwucw2hv21NPCbauJ", including the 222 references to Google Drive folders, revealed no hits. As such, no forensic evidence was located that this SUSD computer was used to create, modify, access, or share links to the Google Drive folder of investigative interest.

#### E) Jann-Michael Greenburg's Microsoft Surface

SUSD issued a personal computer to administrative employee Jann-Michael Greenburg. The forensic analysis of Greenburg's SUSD computer revealed the following:

- The SUSD computer issued to Greenburg was used from approximately January 9, 2019, when the operating system was installed and the *jmgreenburg* user account was created, through December 12, 2021, when the computer was last written prior to being preserved by Loehrs Forensics. This forensic evidence confirms that this SUSD computer was used by Greenburg and that activity would exist within the date range of interest beginning January 2019 through November 2021.
- A byte for byte forensic search throughout allocated and unallocated space (i.e. deleted data) on Greenburg's computer for all references to a Google Drive revealed approximately 4 hits within system files for the Google Chrome browser. This forensic evidence suggests this SUSD computer was not actively used to access Google Drive.
- Regardless, a byte for byte forensic search was still executed throughout allocated and unallocated space on Greenburg's computer for all references to the specific Google Drive of investigative interest with unique identifier "1RFzYZlmmwucw2hv21NPCbauJ", including the 4 references to Google Drive folders. This search revealed no hits. As

such, no forensic evidence was located that this SUSD computer was used to create, modify, access, or share links to the Google Drive folder of investigative interest.

Please do not hesitate to reach out with any question or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Bush".

Michele Bush, CCE, CMFE  
Forensics Expert