## **Chart: Names of the "Unindicted Co-Conspirators" in Fulton County Georgia Indictment**

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### Just Security

August 16, 2023; updated on August 17 and 25, 2023 (updates are noted in the Chart itself and also listed below the Chart)

In a 41-count <u>indictment</u> unsealed on Monday, a Fulton County, Georgia grand jury charged former President Donald Trump and 18 other defendants with a constellation of crimes. The indictment alleges several interconnected schemes to overturn the legitimate results of Georgia's 2020 presidential election—and efforts to conceal those schemes.

The indictment also catalogs the acts of 30 unnamed "unindicted co-conspirators," who were allegedly involved in "overt acts in furtherance of the conspiracy." In the Chart below we assembled ample clues throughout the charging document to match the anonymous co-conspirators to possible identities. In many cases, the attribution is clear because the Indictment references communications sent or received by a particular individual which can be compared to communications in the publicly available record (including the final report and documents produced by the House Select Committee and in litigation). While there is not sufficient information to fully confirm all 30—and prosecutors are ethically barred from identifying unindicted co-conspirators without issuing charges—we have pieced together many of their potential identities. We also show the basis for any potential attributions in the Chart.

The Chart will be updated as more information becomes publicly available.

We welcome readers' feedback and additional information (email address).

Chart. Who are The Potential Unindicted Co-Conspirators?		
Unindicted Co-	Possible Identity	References in
Conspirator		Indictment
Individual 1	Tom Fitton	Act 1, p. 20
	Act 1 in the indictment references a 10/31/2020 discussion Individual 1 had with Trump; a <u>record</u> of which is included in the House Select Committee's document production.	

# Chart. Who are The Potential Unindicted Co-Conspirators?

Unindicted Co-	Possible Identity	References in
Conspirator	•	Indictment
Individual 2	<b>False Elector</b> Acts 79-82 in the indictment indicate that Individual 2 is one of Georgia's 16 false electors. We list each false elector who	Act 2, p. 20 Act 36, p. 28 Act 37, p. 28 Act 54, p. 32 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41
Individual 3	email Individual 3 received on 01/01/2021; a record of which is included in the House	Act 3, p. 20* Act 94, p. 44 Act 109, p. 49 *Note that Act 3 is apparently mislabeled as Act 2.
Individual 4	Individual 4 and other individuals, introducing Individual 4 to Scott Hall. The same email is accounted for in <i>Curling v.</i> <i>Raffensperger</i> and discussed during Sinners' deposition (at p. 80:4-19). Act 86 in the indictment references an email sent on 12/14/2020 by Individual 4 to Mike	Act 4, p. 20 Act 45, p. 30 Act 63, p. 36 Act 65, p.36 Act 66, p. 37 Act 67, p. 37 Act 68, p. 37 Act 71, p. 38 Act 72, p. 38 Act 73, p. 38 Act 76, p. 39 Act 77, p. 39 Act 86, p. 42

<b>Unindicted Co-</b>	Possible Identity	References in
Conspirator	•	Indictment
Individual 5	<b>Bernard Kerik</b> Act 40 in the indictment references an	Act 9, p. 22 Act 17, p. 23 Act 20, p. 24 Act 40, p. 29 Act 61, p. 35
Individual 6		

Unindicted Co-	Possible Identity	References in
Conspirator	· ·	Indictment
	legislators to discuss holding a special session of the Pennsylvania General Assembly. Waldron attended this meeting (per Rusty Bowers informal congressional interview referenced in House Select Committee final <u>report</u> , p. 313, n. 207). Waldron also <u>confirmed</u> his attendance to the Washington Post.	
Individual 7	G. Michael Brown (or else James Fitzpatrick, Shawn Flynn, Thomas Lane, Valerie	Act 18, p. 23 Act 63, p. 36 Act 77, p. 39 Act 86, p. 42
	McConahay)	net 66, p. 12
	Act 77 in the indictment alleges that Mike Roman sent an email on 12/14/2020 to Robert Sinners, Individual 7, and others, stating: "Please send me an update as soon as the State Electoral College has adjourned and all paperwork is secured."	
	The House Select Committee has the <u>email</u> , which was sent to: G. Michael Brown; James Fitzpatrick; Shawn Flynn; Thomas Lane; Valerie Phillips McConahay; Ryan Terrill; Andrew Iverson; Jesse Law; Robert Sinners.	
	Act 63 in the indictment alleges that Mike Roman sent an email on 12/12/20 to Sinners, Individual 7, and others: "I need a tracker for electors."	
	The House Select Committee has the <u>email</u> , which was sent to: G. Michael Brown; James Fitzpatrick; Shawn Flynn; Thomas Lane; Valerie Phillips McConahay; Jesse Law; Robert Sinners; Peter McGinnis	
	Given these two emails, Individual 7 could only be either Brown, Fitzpatrick, Flynn, Lane, or McConahay.	
	<b>UPDATE:</b> The evidence points most likely to Brown, who served as deputy to Roman, the	

Unindicted Co-	Possible Identity	References in
Conspirator		Indictment
	director of election day operations for Trump's campaign. The other four people in the list were responsible for single states. James Fitzpatrick (PA), Shawn Flynn (MI), Thomas Lane (NM), Valerie Phillips McConahay (NV) (House Select Committee <u>final report</u> ch 3.4 n. 76). We thank Kevin Skoglund for this insight.	
Individual 8	Identified by <u>Atlanta Journal Constitution</u> (the indictment cites a <u>Tweet</u> by Jones).	Act 23, p. 25 Act 34, p. 28 Act 35, p. 28 Act 38, p. 29 Act 68, p. 37 Act 73, p. 37 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41 Act 102, p. 46 Act 161, p. 71 Count 2, p. 72 Count 23, p. 84 Count 41, p. 97
Individual 9		Act 47, p. 31 Act 48, p. 31
	Acts 79-82 in the indictment indicate that Individual 2 is one of Georgia's 16 false	Act 74, p. 39 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41
	The House Select Committee produced the <u>email</u> which was sent to Shafer, copying the email address " <u>treasurer@gagop.com</u> ." Brannan, one of the fake electors, was the <u>Treasurer of the Georgia GOP</u> at the time. There are two other recipients of the email message, but they are both women and Individual 9 is identified in the Indictment as a man.	

Unindicted Co-	Possible Identity	References in
Conspirator		Indictment
	Identified by <u>The Daily Beast</u> . See also David Shafer congressional <u>deposition</u> (66: 18-23)	
Individual 10	Vikki Townsend Consiglio or Carolyn Fisher [Updated] Act 48 of the indictment references an email that Individuals 9, 10 and 11 received on or about 12/10/20 from Kenneth Chesebro. The description matches an <u>email</u> sent by Chesebro on that date to Joseph Brannan (separately identified as Individual 9), Vikki Townsend Consiglio, and Carolyn Fisher.	Act 48, p. 31 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41
	Identified by <u>The Hill</u> .	
Individual 11	Vikki Townsend Consiglio or Carolyn Fisher [Updated] Act 48 of the indictment references an email that Individuals 9, 10 and 11 received on or about 12/10/20 from Kenneth Chesebro. The description matches an <u>email</u> sent by Chesebro on that date to Joseph Brannan (separately identified as Individual 9), Vikki Townsend Consiglio, and Carolyn Fisher. Identified by <u>The Hill</u> .	Act 48, p. 31 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41
Individual 12	<b>False elector</b> See the entry for "Individual 2" for the list of unidentified false electors.	Act 62, p. 36 Act 79, p. 40 Act 80, p. 40 Act 81, p. 41 Act 82, p. 41
Individual 13	False elector	Act 74, p. 39 Act 79, p. 40 Act 80, p. 40
	See the entry for "Individual 2" for the list of unidentified false electors.	Act 81, p. 41

<b>Unindicted Co-</b>	Possible Identity	References in
Conspirator		Indictment
		Act 82, p. 41
Individual 14	False elector	Act 79, p. 40
individuur i i		Act 80, p. 40
		Act 81, p. 41
	See the entry for "Individual 2" for the list of unidentified false electors.	Act 82, p. 41
Individual 15	False elector	Act 79, p. 40
		Act 80, p. 40
	See the entry for "Individual 2" for the list	Act 81, p. 41
	of unidentified false electors.	Act 82, p. 41
		Act 85, p. 42
Individual 16	False elector	Act 79, p. 40
		Act 80, p. 40
	See the entry for "Individual 2" for the list	Act 81, p. 41
	of unidentified false electors.	Act 82, p. 41
Individual 17	False elector	Act 79, p. 40
		Act 80, p. 40
		Act 81, p. 41
	See the entry for "Individual 2" for the list of unidentified false electors.	Act 82, p. 41
Individual 18	False elector	Act 79, p. 40
		Act 80, p. 40
	See the entry for "Individual 10 for the list	Act 81, p. 41
	of unidentified false electors.	Act 82, p. 41
Individual 19	False elector	Act 79, p. 40
		Act 80, p. 40
	See the entry for "Individual ?" for the list	Act 81, p. 41
	See the entry for "Individual 2" for the list of unidentified false electors.	Act 82, p. 41
Individual 20		Act 90, p. 43
	Patrick Byrne or else Emily	
	Newman	
	rewman	
	Act 90 in the indictment references a	
	12/18/2020 meeting Individual 20 had with	
	Trump, Giuliani and Powell, in the White	
	House; as the House Select Committee	
	final report states, as well as Derek Lyon's	
	committee <u>deposition</u> (at p. 111:3-19) and	
	other reporting, it was Powell, Giuliani,	
	Flynn, Byrne, and Emily Newman	

		References in
Conspirator		Indictment
	advancing different "strategies and theories" during the 12/18/2020 meeting.	
	<b>Update</b> : On Aug. 16, Byrne appeared to deny that he is Individual 20 in an interview with the <u>Salt Lake Tribune</u> , and said he has no contact with the Georgia investigators before the indictment. That said, Byrne said, "Never talked to them, never heard from them, <u>but I happily</u> welcome them blaming it on me" (emphasis added). And his denial of being Individual 20 was based on a flawed premise that unindicted co-conspirators are usually cooperators ("An unindicted co- conspirator is usually cooperating with prosecutors to avoid imprisonment," Byrne said in a text message to The Tribune. "Not me.").	
Individual 21	Todd Sanders or Conan Hayes	Act 91, p. 44
	Act 91 in the indictment references an email sent by Powell that mentioned Sanders, Hayes, and Waldron; a <u>record</u> of which was obtained in <i>Curling v</i> . <i>Raffensperger</i> . Waldron is identified as Individual 6.	
Individual 22	Todd Sanders or Conan Hayes	Act 91, p. 44
	Act 91 in the indictment references an email sent by Powell that mentioned Sanders, Hayes, and Waldron; a <u>record</u> of which was obtained in <i>Curling v</i> . <i>Raffensperger</i> . Waldron is identified as Individual 6.	

<b>Unindicted Co-</b>	Possible Identity	References in
Conspirator	-	Indictment
Individual 23	Participant in phone calls with Harrison Floyd and others.	Act 115, p. 53 Act 127, p. 59
	Act 115 in the indictment references a call from Harrison Floyd to Individual 23 on 01/03/2021 at 8:11pm.	
	Act 127 in the indictment references a four-way call between Harrison Floyd, Trevian Kutti, Stephen Lee, and Individual 23 on 01/05/2021 at 12:14pm.	
Individual 24	Alex Cruce	Act 143, p. 64
	Act 143 in the indictment references Individual 24 flying into Coffee County with Scott Hall. Alex Cruce <u>admitted</u> to this during his deposition in <i>Curling v.</i> <i>Raffensperger</i> (p. 46:6-16).	
Individual 25	D'VIL D'ULI	Act 150, p. 66 Act 154, p. 67
	Act 154 in the indictment references Misty Hampton allowing Individual 25 and Individual 29 to access non-public areas of the Coffee County Board of Elections and Registration Office on 01/18/2021. Videos reported by <u>ABC News</u> show her letting in Douglas Logan and Jeff Lenberg on that date. Act 150 in the indictment references Individual 25 downloading data taken from Coffee County and stored on SullivanStrickler's ShareFile. Individual 25 downloaded data on 01/09/2021, 01/10/2021, 01/11/2021, and 01/13/2021. <u>Activity logs</u> show Logan downloading data on these days.	

Unindicted Co-	Possible Identity	References in
Conspirator	•	Indictment
Individual 26	Probably Todd Sanders, a.k.a. "Scott T." (a second time) [Update]	Act 151, p. 66
	It is important to note here that the indictment refers to Individual 26 as someone "whose identity is <u>unknown</u> to the Grand Jury" (emphasis added).	
	With advice from Kevin Skoglund, we are able to determine that it is most likely Todd Sanders (who also appears as Individual 21 or 22 above).	
	Act 151 of the indictment states that Individual 26 unlawfully accessed and downloaded the Coffee County data on January 9, 10, 11, 18, and 19, 2021.	
	Activity logs show Sanders downloaded data on these days. Additionally, the activity logs do not show Sanders downloaded the data on February 25 and 26, which Individual 27 did.	
	The Grand Jury may not have identified Sanders because he used "Scott T." as his login name (Skoglund's <u>declaration</u> (§ 59) and Doug London's <u>deposition</u> (108- 109)).	
	Note: Skoglund's <u>declaration</u> (§ 75) in <i>Curling v. Raffensperger</i> identifies six individuals who downloaded election software between 1/10/21 and 2/25/21: Doug Logan, Sanders, Hayes, James Penrose, Pospieszalski, and Pulitzer. J. Alex Halderman's <u>declaration</u> (§ 13) identifies five individuals—the same six	
	except for Pulitzer—who downloaded Coffee County data in January and February 2021.	

Unindicted Co-	Possible Identity	References in
Conspirator	·	Indictment
Individual 27	Probably Conan Hayes (a second time) <mark>[Update]</mark>	Act 152, p. 67
	It is important to note here that the indictment refers to Individual 27 as someone "whose identity is <u>unknown</u> to the Grand Jury" (emphasis added).	
	With advice from Kevin Skoglund, we are able to determine that it is most likely Conan Hayes (who also appears as Individual 21 or 22 above).	
	Act 152 of the indictment states that Individual 27 unlawfully accessed and downloaded the Coffee County data on January 10, 12, 13 and February 25 and 26.	
	Activity logs show Hayes downloaded data on these days. Additionally, the activity logs do not show Hayes downloaded the data on January 9, which Individual 26 did.	
	Note: Skoglund's declaration (§ 75) in <i>Curling v. Raffensperger</i> identifies six individuals who downloaded election software between 1/10/21 and 2/25/21: Doug Logan, Sanders, Hayes, James Penrose, Pospieszalski, and Pulitzer. J. Alex Halderman's declaration (§ 13) identifies five individuals—the same six except for Pulitzer—who downloaded Coffee County data in January and February 2021.	
Individual 28	Jim Penrose	Act 153, p. 67 Act 155, p. 67
	Act 155 in the indictment alleges that Individual 28 sent an email on 04/22/2021 to SullivanStrickler COO Paul Maggio,	

<b>Unindicted Co-</b>	Possible Identity	References in
Conspirator		Indictment
	asking him to send voting data taken from Coffee County to an attorney associated with Sidney Powell. The email was sent by Jim Penrose, and copied Stephanie Lambert, and it was accounted for in <i>Curling v. Raffensperger (see</i> Gabriel Sterling's <u>deposition</u> , at p. 286:22-25; Kevin Skoglund <u>declaration</u> , at § 77). Penrose was also the one person who downloaded all voting data from SullivanStrickler's ShareFile on 01/13/2021, according to <u>activity logs</u> (p.6), which Act 153 in the indictment alleges.	
Individual 29	Jeffrey Lenberg Act 154 in the indictment references Misty Hampton allowing two individuals to access non-public areas of the Coffee County Board of Elections and Registration Office on 01/18/2021. Videos reported on <u>by media</u> show her letting in Douglas Logan and Jeff Lenberg on that date. Because Individual 25 is likely Doug Logan, Individual 29 is likely Jeffrey Lenberg.	Act 154, p. 67
Individual 30	<b>Stefanie Lambert</b> Act 155 in the indictment alleges that Jim Penrose sent an email to SullivanStrickler COO Paul Maggio on 04/22/2021, asking "to transmit" all Coffee County data "to unindicted co-conspirator Individual 30." The email is accounted for in <i>Curling v.</i> <i>Raffensperger,</i> which indicates Stefanie Lambert was to receive the data. Penrose wrote to send the materials to "the same address as before" and "[i]nvoice Stefanie	Act 155, p. 67

Unindicted Co- Conspirator	v	References in Indictment
	FedEx package was sent to Lambert– <i>See</i> Gabriel Sterling's <u>deposition</u> , at p. 286: 22-25; Kevin Skoglund <u>declaration</u> , at §§ 77-78).	

### Updates made on August 17, 2023:

1. Individual 7: New analysis of information indicating higher likelihood of G. Michael Brown (with appreciation to Kevin Skoglund for advice)

2. Individual 9: The <u>Daily Beast</u> identified Individual 9 as then-Georgia GOP treasurer Joseph Brannan (reporting for Daily Beast by Roger Sollenberger and William Bredderman)

**3**.Individual 20: Include August 16, 2023 denial by Patrick Byrne (interview with <u>Salt Lake Tribune</u>'s Bryan Schott)

4. Individual 26: New analysis of SullivanStrickler activity logs indicating Individual 26 is Todd Sanders, a.k.a "Scott T" (with appreciation to Kevin Skoglund for advice)

5. Individual 27: New analysis of SullivanStrickler activity logs indicating Individual 27 is Conan Hayes (with appreciation to Kevin Skoglund for advice)

#### Updates made on August 25, 2023:

Individuals 10 and 11: <u>The Hill</u>'s Zach Schonfeld identified Individuals 10 and 11 as Vikki Townsend Consiglio or Carolyn Fisher based on a matching email.