

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21-cr-332-PLF
 :
 PAUL RUSSELL JOHNSON *et al.*, :
 :
 Defendants. :

AFFIDAVIT OF PAUL RUSSELL JOHNSON

Pursuant to 28 U.S.C. § 1746 and Local Rule 5.1(f), I, Paul Russell Johnson, hereby declare as follows:

1. I, Paul Russell Johnson, am over 18 years of age, and I am competent to testify.
2. I am making this affidavit with the protections of *Simmons v. United States*, and the understanding that anything in this affidavit may not thereafter be admitted against me at trial on the issue of guilt unless I makes no objection. 390 U.S. 377, 394 (1968).
3. I am married to Person-1 in this litigation.
4. I pay for two phones. I typically carry with me the phone with number X ("Phone X"). Person-1 typically carries with her with number Y ("Phone Y"). *See* Ex. 1.
5. Person-1 functions like my executive assistant. In that capacity, she has access to all my private information through Phone Y.
6. For example, Phone Y contains:
 - a. My Social Security Number;
 - b. Privileged communications with my lawyers and my son's guardians ad litem. *See* Ex. 2;
 - c. The username and password to access my medical records;

- d. The username and password to access my son's medical records, as well as emails and text messages from his counselor;
 - e. Usernames and passwords to access my personal savings account, my business checking account, and my two business loan accounts. I do not know how to access my business loan accounts through Phone X.
 - f. Username and password to access my child support account. I do not know how to access my child support account through Phone X.
7. We use software on both phones called If This Then That ("IFTTT"), which allows her to see on Phone Y any message or email that goes to Phone X. It also transcribes any voicemails left on Phone X, and allows them to be accessed from Phone Y. *See* Ex. 3.
8. My personal and business emails are permanently logged in on Phone Y. Person-1 will sometimes use Phone Y to write personal and business emails on my behalf.
9. Photos taken on Phone X back up to the cloud and can be accessed from Phone Y.
10. When Phone X is broken, I carry with me and use Phone Y.
11. I own a safe is 55 inches tall, 29 inches wide, and 20 inches deep and is located in the bedroom of my home.
12. Because my family and I had recently moved to a new home, I was storing various items in the safe until we could fully unpack our things.
13. The four walkie-talkies that the FBI agents seized on April 13, 2021 were inside of the safe.
14. I always keep the safe locked unless I need to remove something from it because the door on it will swing open and block the path into my closet. *See* Ex. 4, IMG-0458.

15. The FBI agents could not have obtained access to the safe's contents, including the four walkie-talkies, without unlocking the safe.

16. I did not consent to law enforcement unlocking my safe on April 13, 2021.

I declare under penalty of perjury that the statements above are true.

Date: December 9, 2021

Respectfully submitted,

/s/ Paul Russell Johnson

Paul Russell Johnson



Sworn and subscribed to before me on this 10 day of December 2021.



My commission expires 10/31/2025

KATELIN R SELLERS
NOTARY PUBLIC
REGISTRATION # 7753607
COMMONWEALTH OF VIRGINIA
COMMISSION EXPIRES
OCTOBER 31, 2025

EXHIBIT 1

EXHIBIT 2



Kobie (YouMail)

6:20 PM

Missed Call from Kobie at [REDACTED] 0481

[REDACTED] 0481 called [REDACTED] 630...

Inbox



EXHIBIT 3

IFTTT

🔍 Filter

All (10) Created by me (3)

Connect multiple accounts

**Automatically log every call
you make on your Android
phone to a Google
spreadsheet**

by kev

Connected ☒

👤 73k



**Automatically log the calls
you receive to your Android
phone to a Google**

Create

Explore



EXHIBIT 4

