

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KONNECH, INC.,

§

Plaintiff,

§

Civil Action No. 4:22-cv-03096

§

v.

§

TRUE THE VOTE, INC., *et al.*,

§

§

Defendants.

§

§

§

**SUPPLEMENTAL SUBMISSION FOR REPLY IN SUPPORT OF MOTION FOR  
LEAVE TO INSPECT**

Having just received the attached Affidavit of Grant Bradley, and in the interests of a more complete record, Defendants hereby supplement their Reply with the attached Exhibit H, Affidavit of Grant Bradley.

Respectfully Submitted,

GREGOR | WYNNE | ARNEY, PLLC

By: /s/ Michael J. Wynne  
Michael J. Wynne

Texas State Bar No. 0078529  
SDTX No. 0018569  
Cameron Powell  
DC Bar No. 459020  
909 Fannin Street, Suite 3800  
Houston, Texas 77010  
Telephone: (281) 450-7403  
[mwynne@gwafirm.com](mailto:mwynne@gwafirm.com)  
[cpowell@gwafirm.com](mailto:cpowell@gwafirm.com)

**ATTORNEYS FOR DEFENDANTS TRUE THE  
VOTE, INC., CATHERINE ENGELBRECHT,  
AND GREGG PHILLIPS**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of April 2023, this document was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notifications of the filing to all attorneys of record.

By: /s/ Michael J. Wynne  
Michael J. Wynne

## **EXHIBIT H**

STATE OF MICHIGAN  
COUNTY OF INGHAM

§  
§  
§

**AFFIDAVIT OF GRANT BRADLEY**

Before me, the undersigned notary, on this day personally appeared Grant Bradley, whose identity is known to me, who under oath states as follows:

1. I make this Affidavit on personal knowledge, except as to matters stated upon information and belief, and as to those matters, I testify to the best of my knowledge, information and belief.

2. On December 22, 2022, I filed a Verified Complaint and Jury Demand (“Complaint”) against Konnech, Inc. in Michigan state court. I understand the Complaint was attached as Exhibit C to Defendants’ Opposed Emergency Motion for Leave to Inspect Property of Plaintiff to Prevent Further Spoliation in the case of *Konnech, Inc. v. True the Vote, Inc., Gregg Philips, and Catherine Engelbrecht*, Case No. 4:22-CV-3096, in the United States District Court for the Southern District of Texas, Houston Division (hereinafter, the “True the Vote” case).

3. I am not involved in the True the Vote case, however, I was asked by one of the attorneys in that case to execute this Affidavit as an alternative to being deposed or otherwise becoming immediately involved.

4. If subpoenaed, I would be available to testify at trial to the allegations I made in my Complaint, some of which I understand were quoted by Defendants in their Motion, and other facts, including all of the following:

a. Shortly after I started my employment with Konnech, Eugene Yu approached me about making a campaign contribution to Michigan Secretary of State Jocelyn Benson's campaign in his name, and said that Konnech would reimburse me for. I recognized the request to be a violation of Michigan Campaign Finance Law and rejected it.

b. In what appeared to be in violation of its contracts with U.S.-based customers, Konnech provided programmers in China private data of U.S.-based election workers, to include social security numbers and other identifying

information. I witnessed customers' data (specifically poll-watcher information) being made accessible to foreign nationals in China. *See* Complaint, ¶3;

c. Konnech's election logistics software was (and may still be) substantially developed by developers, designers and coders who (to the best of my knowledge, information and belief), are all Chinese nationals based out of Wuhan, China. *See* Complaint, ¶15;

d. Konnech initially identified these Chinese nationals as employees of that company, but upon information and belief, in response to political pressure to sever ties with China, Konnech, having no intention of severing the relationship with the Chinese nationals, hired them back as independent contractors and assigned to them the exact same responsibilities they held as employees. *See* Complaint, ¶16.

e. Based on my review of the users in the apps that Konnech used for collaborative development (which information I had as part of the performance of my duties for the company), coding, and design (DingTalk, ZenTao), Konnech appeared to employ at least 80 and perhaps around 100 Chinese nationals to work on its elections software for American clients.

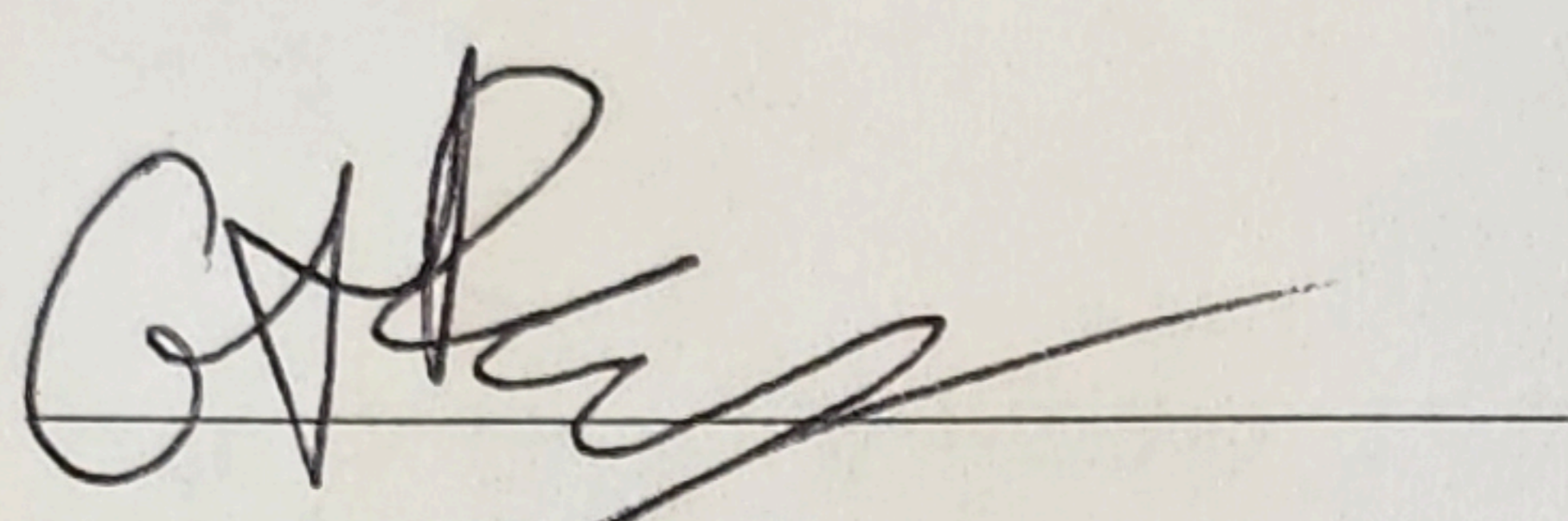
f. The standard process Konnech used to onboard China-based programmers was to create customer environments for the programmers by uploading files containing all of the American customers' poll workers' information, polling locations, and other data to DingTalk or Jira, where the leaders from the Chinese team would have access to Jira, and the entire Chinese team would have access to DingTalk.

g. During my employment, on or after October 4, 2022 I was instructed by my superiors to say outwardly to customers that poll worker data was not stored overseas, was not available to foreign nationals, and that we had no idea why Eugene Yu had been arrested (that is, for storing data about American poll workers on servers in China). My superiors who instructed me in these regards, and I, knew these statements were false. Specifically, Eugene Yu had previously told me that Konnech used Chinese nationals to work on Konnech's software and

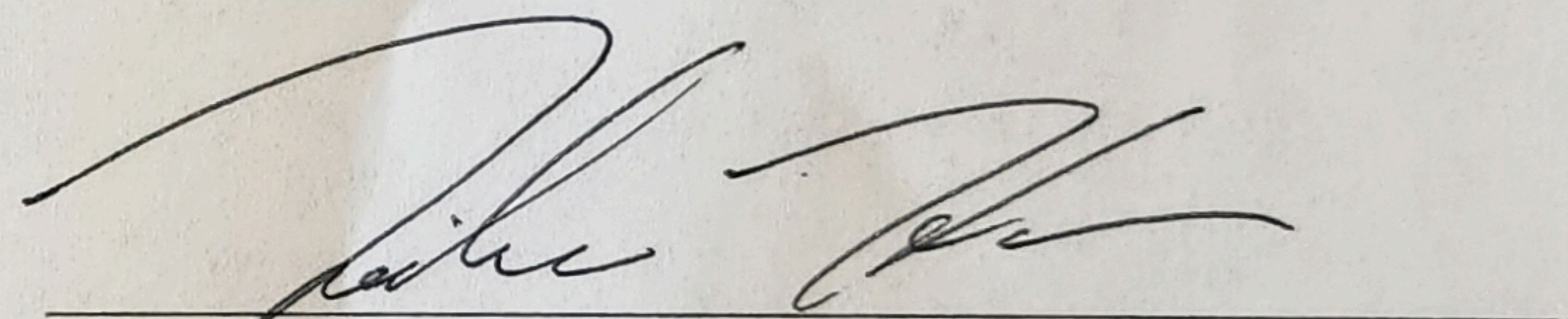
coding and claimed "everyone" did it, including companies like Microsoft and Apple. He told me not to "worry about" it. I told my superiors that I would not comply with these instructions, and I refused to make these or any other representations to customers (or anyone else) that I knew or thought were untrue.

I certify under penalty of perjury that the foregoing is true and correct.

Further Affiant Sayeth Not.

  
Grant Bradley

Subscribed to and sworn before me on this 5<sup>th</sup> day of April, 2023.

  
Notary Public in and for the state of Michigan

NICHOLAS HERSON  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF INGHAM  
MY COMMISSION EXPIRES Nov 30, 2025  
ACTING IN COUNTY OF Ingham

