

# SWORN STATEMENT

For use of this form, see AR 190-45; the proponent agency is PMG.

## PRIVACY ACT STATEMENT

**AUTHORITY:** Title 10, USC Section 301; Title 5, USC Section 2951; E.O. 9397 Social Security Number (SSN).  
**PRINCIPAL PURPOSE:** To document potential criminal activity involving the U.S. Army, and to allow Army officials to maintain discipline, law and order through investigation of complaints and incidents.  
**ROUTINE USES:** Information provided may be further disclosed to federal, state, local, and foreign government law enforcement agencies, prosecutors, courts, child protective services, victims, witnesses, the Department of Veterans Affairs, and the Office of Personnel Management. Information provided may be used for determinations regarding judicial or non-judicial punishment, other administrative disciplinary actions, security clearances, recruitment, retention, placement, and other personnel actions.  
**DISCLOSURE:** Disclosure of your SSN and other information is voluntary.

1. LOCATION Hedgesville, WV	2. DATE (YYYYMMDD) 20221024	3. TIME 1248	4. FILE NUMBER
5. LAST NAME, FIRST NAME, MIDDLE NAME Cain, Dennis, Nathan	6. SSN	7. GRADE/STATUS	
8. ORGANIZATION OR ADDRESS Cain & Associate LLC			

9. I, Dennis Nathan Cain, WANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH:  
We, Cain and Associates LLC, were contracted to assist the Los Angeles District Attorneys office Bureau of Investigation in the examination and analysis of data obtained through a search warrant related to California vs. Eugene Wei Yu, case number BA509784 of a US company named Konnech, an election logistic software company (<https://www.konnech.com>). The cyber forensics services we provided were network enumeration & packet capture, live host capture to search, find, & extract, and data examination and analysis.

PollChief is another name Konnech operates under (<https://www.pollchief.com> redirects to <https://www.konnech.com>). According to PollChief's website, their former name was LJ Connection LLC.

The data we saw indicated the following:

- US persons and non-US persons appearing to be located in People Republic of China(PRC), associated with Konnech, had shared information, including but not limited to, personally identifying information (PII) of election workers, registered voters, election equipment, and election judges (hereby referred to as "Election Related Data") of at least 6 separate US counties.
- Konnech appears to be employing non-US persons to perform coding/programming/software development work on election worker management systems. Located both inside and outside the United States.
- Many of these employees appeared to be Chinese nationals based on social media profiles, listed phone numbers, and listed locations in the data we observed.
- All Konnech employees and Chinese developers were at one time given privileged access to these systems, this almost certainly gave them access to US persons PII due to a misconfiguration allowing them to change their own role to "superuser".
- Konnech automatically imported, as well as linked their websites to Scytl, a Spanish Government funded company, which has been involved in many controversies to include election voting fraud.
- A Konnech employee, listed and the company's CTO, Luis Nabergoi possibly a citizen of Spain, has ties directly to Scytl.
- Konnech employees appear to have shared election related data through, from, and on Chinese servers/applications which are stored for up to 180 days.
- Observed organizational structure that Konnech may be connected with:
  - Wuhan Yiqing Technology Co. Ltd.,
  - Jinhua R&D Center
  - Wuhan R&D Center
- These companies appear to be linked to and subsidized by the PRC government as indicated by PRC government documents recovered and review by our team.
- Data was obtained through JIRA, DingTalk, ScreenCast, GitHub, OSINT Tools, and Company Websites.
- Along with this sworn statement please see the attached additional redacted reports. Un-redacted versions of these reports may be obtained for investigative purposes through a written request to Cain & Associates. Access to the evidence should be requested through LA County DA's office.

10. EXHIBIT	11. INITIALS OF PERSON MAKING STATEMENT	Page 1 of 3
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ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT OF \_\_\_\_\_ TAKEN AT \_\_\_\_\_ DATED \_\_\_\_\_"  
THE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT, AND PAGE NUMBER MUST BE INDICATED.

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STATEMENT OF Dennis Nathan Cain TAKEN AT Hedgesville, WV DATED 20221024

9. STATEMENT (*Continued*)

INITIALS OF PERSON MAKING STATEMENT

**AFFIDAVIT**

I, Dennis Nathan Cain, HAVE READ OR HAVE HAD READ TO ME THIS STATEMENT WHICH BEGINS ON PAGE 1, AND ENDS ON PAGE 3. I FULLY UNDERSTAND THE CONTENTS OF THE ENTIRE STATEMENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL CORRECTIONS AND HAVE INITIALED THE BOTTOM OF EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT FREELY WITHOUT HOPE OF BENEFIT OR REWARD, WITHOUT THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL INFLUENCE, OR UNLAWFUL INDUCEMENT.

\_\_\_\_\_  
*(Signature of Person Making Statement)*

Subscribed and sworn to before me, a person authorized by law to administer oaths, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at Hedgesville, WV.

\_\_\_\_\_  
*(Signature of Person Administering Oath)*

\_\_\_\_\_  
*(Typed Name of Person Administering Oath)*

\_\_\_\_\_  
*(Authority To Administer Oaths)*

WITNESSES:

\_\_\_\_\_  
\_\_\_\_\_

ORGANIZATION OR ADDRESS

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ORGANIZATION OR ADDRESS