

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	J.D. OF LITCHFIELD
JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	JUNE 17, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S SUPPLEMENTAL DISCLOSURE AND PRODUCTION OF
ELECTRONICALLY STORED INFORMATION**

Pursuant to Practice Book §§ 13-15 and 13-16, and in continuing compliance with his discovery obligations, Plaintiff Jon Goodwin hereby supplements his prior productions and disclosures as follows:

I. NEWLY DISCOVERED ELECTRONIC RECORDS**

While reviewing archived electronic materials in his possession in June 2026, Plaintiff located an additional electronic export of text-message records, previously extracted from an Apple iPad used by H[REDACTED] M[REDACTED], that had not previously been produced.

The newly located records consist of an iMazing-generated export entitled "Messages – 86 Chat Sessions" and a corresponding PDF export entitled "M[REDACTED], H[REDACTED] Text Messages from 86 Chat Sessions.pdf."

The newly discovered export was generated from an iMazing backup of the iPad bearing an extraction date and time of March 27, 2020, at 20:39 EDT (approximately 8:39 p.m. Eastern Time), and contains substantially the same body of text messages previously produced, together with additional metadata and system-generated entries not reflected in the earlier production.

II. NATURE OF THE SUPPLEMENTAL PRODUCTION**

The supplemental production includes the following files:

1. "H[REDACTED]'s iPad.imazing";

2. "Messages - 85 chat sessions.xlsx," exported from "H[REDACTED]'s iPad.imazing" on August 15, 2021;
3. "Messages - 86 chat sessions.xlsx," exported from "H[REDACTED]'s iPad.imazing" on June 14, 2026;
4. "M[REDACTED], H[REDACTED] Text Messages from 85 Chat Sessions 2020-03-27 203900.pdf," exported from "H[REDACTED]'s iPad.imazing" on September 23, 2021;
5. "M[REDACTED], H[REDACTED] Text Messages from 86 Chat Sessions 2026-06-14 155200.pdf," exported from "H[REDACTED]'s iPad.imazing" on June 14, 2026;
6. An August 26, 2021 email from Plaintiff to Assistant Attorney General Susmita Mansukhani, entitled "Goodwin Subpoena and Testimony," together with its attachment, "2021-08-25 Milot, Raymond and H[REDACTED] Re Deletion of Text Messages.pdf";
7. The August 26, 2021 email from Plaintiff to Assistant Attorney General Susmita Mansukhani forwarded to Christine Jowdy's counsel, Scott Maser on August 26, 2021;
8. The August 26, 2021, email from Plaintiff to Assistant Attorney General Susmita Mansukhani forwarded to Christine Jowdy on August 26, 2021;
9. The August 26, 2021, email from Plaintiff to Assistant Attorney General Susmita Mansukhani forwarded to Attorney Scott Maser and Christine Jowdy on January 26, 2021; and
10. A forensic authentication report regarding the source iMazing backup and the exported files.

The newly produced materials supplement, but do not replace, Plaintiff's prior production.

III. PRIOR DISCLOSURE OF THE TEXT-MESSAGE RECORDS TO THE DEPARTMENT OF CHILDREN AND FAMILIES

The existence of the text-message records was disclosed to the State of Connecticut years before the supplemental production described herein. On or about August 26, 2021, in connection with a subpoena to testify in proceedings brought by the Connecticut Department of Children and Families concerning allegations of neglect involving Defendant Raymond J. Milot and Christine M. Jowdy, Plaintiff advised the Assistant Attorney General representing the Department, Susmita Mansukhani, in writing that he had legally obtained text messages that H[REDACTED] M[REDACTED] had exchanged with multiple parties, dating back to 2018, and provided to her a document concerning the deletion of text messages by Raymond J. Milot and H[REDACTED] M[REDACTED].

Plaintiff produces that correspondence, listed as item 6 in Section II above, as part of this supplemental disclosure. The existence of the text-message records, and Plaintiff's possession of records originating from the device, were therefore known to persons involved in those proceedings no later than 2021.

IV. AUTHENTICATION REPORT**

Attached as Exhibit C is a report entitled "Forensic Authentication Report – Integrity of an iMazing iPad Backup, and Authenticity of the Text-Message Extracts Drawn From It," dated June 14, 2026.

The report concludes, among other things, that:

- the source iMazing backup is authentic, internally consistent, complete, and shows no evidence of alteration or tampering;

- the exported message files are authentic extracts derived from the source backup;
- no message text was added, removed, or altered between the exports examined; and
- differences between the prior and supplemental exports are attributable to export formatting, metadata presentation, sender labeling, contact re-grouping, and a small number of system-generated notifications, rather than any modification of message content.

V. REASON FOR SUPPLEMENTAL PRODUCTION

Plaintiff recently located the additional export during a review of archived electronic materials on an external drive he had previously been unable to access. Upon discovering the existence of the supplemental export and related metadata, Plaintiff promptly undertook efforts to verify its provenance and authenticity and now produces the materials in order to ensure the completeness of discovery.

Plaintiff reserves the right to rely upon the newly produced materials, metadata, authentication report, and any testimony concerning the extraction, preservation, authentication, or contents of the records at deposition, trial, summary judgment proceedings, or other hearings in this matter.

VI. RESERVATION OF RIGHTS

Nothing contained herein shall be construed as a waiver of any objection previously asserted, nor as an admission regarding the admissibility, relevance, authenticity, or evidentiary weight of any document produced by any party.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se

34 N Franklin Ave.

Box 687-2690

Pinedale WY 82941

+1 (212) 372-4803

jgoodwin@protonmail.com

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on June 17, 2026, to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

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Rebecca Mayo-Goodrich
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By: /s/ Jon A. Goodwin

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RAYMOND J. MILOT, JUNIOR	:	JUNE 17, 2026
<i>Defendant</i>	:	

**AFFIDAVIT OF JON GOODWIN REGARDING SUPPLEMENTAL PRODUCTION OF
ELECTRONICALLY STORED INFORMATION**

I, Jon Goodwin, being duly sworn, depose and state as follows:

1. I am the Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth herein.
2. The statements contained in this affidavit are based upon my personal knowledge except where otherwise indicated.
3. During the period relevant to this litigation, I resided with Christine M. Jowdy and her children, including H[REDACTED] [REDACTED].
4. During that time, I personally observed H[REDACTED] [REDACTED] regularly using electronic devices manufactured by Apple, Inc. at Ms. Jowdy's residence.
5. Christine M. Jowdy represented to me that an Apple iPad H[REDACTED] M[REDACTED] used belonged to her.
6. Ms. Jowdy provided me with documentation that I understood to demonstrate her ownership and control of the device.
7. During the period relevant to this action, I observed that the device contained H[REDACTED] M[REDACTED]'s communications, photographs, applications, and account information.
8. After disputes had arisen among members of the Jowdy-Milot family and after litigation had been contemplated, at Christine Jowdy's request, I created a backup of the iPad used by H[REDACTED] M[REDACTED] using the iMazing software application.
9. The backup was created for the purpose of preserving electronic evidence and records that I believed might be relevant to anticipated legal proceedings, investigations, custody-related matters, and related disputes, including this action.
10. The iMazing software extracted data directly from the device and generated a backup in the ordinary format used by that software.

11. The backup bears an extraction date corresponding to March 27, 2020, at approximately 8:39 p.m. Eastern Time.
12. After the backup was created, I retained the backup and associated exports as preserved electronic evidence.
13. I did not alter, edit, fabricate, or modify the contents of the backup or any message records contained within it.
14. I am informed and believe that text messages obtained from this device were later utilized as exhibits in proceedings brought by the Connecticut Department of Children and Families concerning allegations of neglect involving Defendant Raymond J. Milot and Christine M. Jowdy.
15. Based upon the use of those text messages in those proceedings, I am informed and believe that, by no later than 2021, Christine M. Jowdy, Raymond J. Milot, H[REDACTED] [REDACTED], and/or their respective counsel were aware that Ms. Jowdy possessed text-message records originating from the device and that such records existed and could be used in legal proceedings.
16. I personally informed the Assistant Attorney General representing the Connecticut Department of Children and Families, Susmita Mansukhani, of the existence of the text-message records originating from the device. On or about August 26, 2021, in connection with a subpoena to testify in the Department of Children and Families proceedings concerning Defendant Raymond J. Milot and Christine M. Jowdy, I advised Assistant Attorney General Mansukhani in an email that I had legally obtained text messages that H[REDACTED] [REDACTED] had exchanged with multiple parties, dating back to 2018, and I provided to her a document concerning the deletion of text messages by Raymond J. Milot and H[REDACTED] M[REDACTED]. *See Exhibit A.*
17. I forwarded the email to AAG Mansukhani on August 26, 2021, and on January 26, 2022. *See Exhibit B.*
18. I make the foregoing statement to explain my understanding that the existence of the text-message records and Ms. Jowdy's possession of records originating from the device were known to persons involved in those proceedings years before the supplemental production described herein.
19. From the backup, iMazing generated message exports reflecting text-message communications stored on the device.
20. In connection with discovery in this action, I previously produced text messages from a PDF export entitled "M[REDACTED], H[REDACTED] Text Messages from 85 Chat Sessions."
21. In June 2026, while reviewing archived electronic materials in my possession, I located an additional iMazing export generated from the same backup.

22. The newly located materials consist of records identified as "Messages – 86 Chat Sessions" and the corresponding PDF export entitled "M[REDACTED], H[REDACTED] Text Messages from 86 Chat Sessions."
23. Upon locating these materials, I compared them with the previously produced export and determined that the newly located materials contained additional metadata and system-generated records not reflected in the earlier production.
24. Upon locating the supplemental materials, I undertook efforts to verify their authenticity, provenance, and relationship to the previously produced records.
25. As part of that process, I prepared and obtained a forensic authentication analysis of the source iMazing backup and the associated message exports.
26. The authentication analysis concluded that the source iMazing backup is authentic, internally consistent, complete, and exhibits no evidence of tampering or alteration.
27. The authentication analysis further concluded that the message exports are authentic extracts of the source backup and that no message text was added, removed, or altered.
28. A true and accurate copy of the forensic authentication report is attached hereto as Exhibit C.
29. Since its creation, the backup has remained in my possession, custody, or control, or in electronic storage under my control.
30. The supplemental export produced herewith was generated from the same source backup that was previously preserved.
31. The supplemental export was located during a review of archived electronic materials and was promptly disclosed after its discovery.
32. Promptly after locating and reviewing the supplemental materials, I produced them to opposing counsel in order to supplement my prior discovery responses and productions.
33. The supplemental production is intended to ensure the completeness of discovery and to provide all relevant electronic records presently known to me concerning the subject matter of this action.
34. To the best of my knowledge, information, and belief, the supplemental materials produced herewith are true and accurate copies of records generated from the March 27, 2020, iMazing backup described above.
35. I reserve the right to provide additional supplemental productions should additional responsive materials be discovered.

Affiant further sayeth naught.

I declare under penalty of false statement pursuant to Connecticut General Statutes § 53a-157b that the foregoing is true and correct to the best of my knowledge and belief.

Affiant,


Jon Goodwin

On the 17th day of June, 2026, before me personally appeared, to me known and known to me to be the same persons described in and who executed the above instrument and acknowledged to me that they executed the same.



~~Commissioner of Superior Court~~

Notary Public

My Commission Expires: *April 30, 2030*

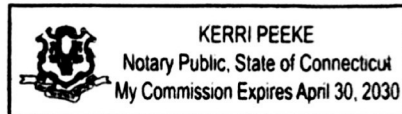


Exhibit A

To

Plaintiff's Supplemental Disclosure and Production of ESI

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

August 26, 2021 email to Assistant Attorney General Susmita Mansukhani

Goodwin Subpoena and Testimony

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>
To Mansukhani, Susmita <susmita.mansukhani@ct.gov>
Date Thursday, August 26th, 2021 at 8:40 AM

Dear Assistant Attorney General Mansukhani:

I very much appreciate your subpoena to testify as to how the State of Connecticut, Department of Children and Families ("DCF") is supporting Mr. Milot's alienation of Ms. Jowdy from their children. I'm sure you want to get to the truth. And, I'm sure you, like Ms. Jowdy, are very worried that Mr. Milot grooming his children to commit criminals acts, including: destroying evidence, property theft, stalking, assault, battery, will translate into their behaving antisocially as adults.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] I legally obtained text messages H [REDACTED]
M [REDACTED] exchanged with multiple parties. The text messages go back to 2018 and show significant manipulative, antisocial and unlawful conduct including:

- Mr. Milot instructing H [REDACTED] to delete text messages to cover his and her tracks (see attached summary);
- Mr. Milot interfering with Ms. Jowdy's custody of H [REDACTED] by: (1) meeting her to receive property stolen from Ms. Jowdy's home on November 2, 2019; (2) meeting her prior to H [REDACTED] instigating the fight with N [REDACTED] on November 1, 2019 resulting in N [REDACTED] taping bolts between his fingers to use as a weapon against his sister; (3) instructing H [REDACTED] to defy her mother's grounding her by catching a ride with a friend to soccer practice; (4) arranging for a friend of Mr. Milot's to pick H [REDACTED] up and hide her from Ms. Jowdy when H [REDACTED] ran away on March 21, 2020 after being confronted regarding her theft of property from Ms. Jowdy's residence, having her phone at Ms. Jowdy's residence and deleting messages off Ms. Jowdy's phone.
- Mr. Milot tacitly coaching H [REDACTED] to use her therapist to instigate a DCF report regarding her mother restraining N [REDACTED] ;
- Mr. Milot supporting H [REDACTED] to instigate the reporting to DCF by "Ms. Hamilton" of Schaghticoke Middle School of the November 1, 2019 incident with N [REDACTED] M [REDACTED] that H [REDACTED] incited and videotaped after meeting with Milot outside Ms. Jowdy's residence; and
- Mr. Milot using H [REDACTED] to stalk me and Ms. Jowdy.

There's a lot more. The messages elucidate Milot is using H [REDACTED] to assist him to wage a custody war and that rather than co-parent, he habitually undermines Ms. Jowdy's authority to cause chaos in her household she cannot control. The violence by N [REDACTED] in Ms. Jowdy's home was definitely instigated by Milot including: (1) using H [REDACTED] to instigate fights with N [REDACTED] and hr demanding N [REDACTED] be punished, (2) insisting N [REDACTED] be prescribed amphetamines instead of a psychotropic, (3) leveraging the behavior plan worked out with N [REDACTED] 's then therapist, Kristie Liotta, that Ms. Jowdy was following in her home with N [REDACTED] but, to N [REDACTED] 's preference, Milot was not following when N [REDACTED] was with him; and (4) leveraging N [REDACTED] 's preference to be with his siblings

and not left out while they were with Mom or Dad via the odd visitation arrangement Milot insisted on. Milot's behavior is diabolical. Ms. Jowdy attempted to mitigate the problem by placing N■■ with Milot for a short time. Beyond demanding the children be placed in foster care, there's nothing Ms. Jowdy could have done to avoid the issues in her home. It's very sad for the children because anyone who reads the text messages, the OFW messages and related relevant documents will quickly realize what's really going on.

You are aware that the day Renetta Alexander-Edmund came to Ms. Jowdy's and my residence, I was very ill. I had COVID like symptoms but at the time had no idea what I was battling. While I wasn't tested, I do believe that's what I had. Through Ms. Jowdy, I invited Ms. Alexander-Edmund to contact me to arrange another time. Renetta didn't until she revealed she was acting in bad faith and attempting to use me as a scapegoat. At that point there was no way I would speak to her. Were Renetta not biased, I would have shared the evidence I gathered with her. That said, I find it bizarre DCF blatantly supports a parent who texts and drives, permitted the use of illicit drugs in his home around impressionable minors and who habitually ignores expert advice regarding therapy, behavioral plans and medication for his special needs child over a parent who doesn't use drugs and truly has the interests of her children at heart.

I've known a Ms. Jowdy since 1995. From the time she married Milot until September of 2019, I saw Ms. Jowdy once at a meeting in New York City. That said, we worked together professionally and maintained contact over the years. Our conversations always turned to her children-- their growth and development and Ms. Jowdy's planning and saving money to assist them with their futures. Mr. Milot on the other hand flip flops and doesn't appear to even understand N■■ M■■'s special needs. Based on all of the information I have, which is considerable, it's clear the Jowdy/Milot Children need Ms. Jowdy to make decisions for them related to their medical and therapeutic care and educational needs. I find it very sad for them that Mr. Milot and DCF are marginalizing her.

While I'm definitely biased, my strong suggestion is you drop the specious neglect petition against Ms. Jowdy and pursue Mr. Milot for fraudulently involving DCF to wage a custody battle against her and endangering the health and morals of his children.

Because my testimony certainly will invoke my expertise regarding my forensic analysis of electronic communications exchanged by the parties many of which are apparently not available from any other source, I expect the state will compensate me for my time. My billing rate is \$1,500 per hour. While I won't charge the state for the considerable time it took me to analyze H■■■■ M■■■■'s 21,327 text messages and relevant communications related to this action, I do believe it's appropriate the state remunerate me for time to prepare my testimony and any exhibits as well as standby in case the court does not call me promptly or delays my testimony. Let's discuss your needs and come up with an estimate so I can bill you a retainer to be paid prior to my testifying.

I will be traveling from Sunday until Thursday next week. Consequently, I will not have a private, stable broadband Internet connection during that time. If you'd like, I can arrange a hotel with a private Internet connection. If that will work, I expect the state will pay the hotel room cost.

Best regards,
Jon Goodwin

jgoodwin@protonmail.ch

+1 (212) 372-4803

69.95 KB 1 file attached

2021-08-25 Milot, Raymond and H [REDACTED] Re Deletion of Text Messages.pdf 69.95 KB

Exhibit B

To

Plaintiff's Supplemental Disclosure and Production of ESI

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**August 26, 2021 email to Assistant Attorney General Susmita Mansukhani forwarded to
Attorney Scott Maser and Christine Jowdy on August 26, 2021 and January 26, 2022**

Fw: Goodwin Subpoena and Testimony

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>
To Ms. Jowdy Christine <christinejowdy@protonmail.com>
Date Thursday, August 26th, 2021 at 8:41 AM

----- Original Message -----

On Thursday, August 26th, 2021 at 8:40 AM, Jon Goodwin <jgoodwin@protonmail.ch> wrote:

Dear Assistant Attorney General Mansukhani:

I very much appreciate your subpoena to testify as to how the State of Connecticut, Department of Children and Families ("DCF") is supporting Mr. Milot's alienation of Ms. Jowdy from their children. I'm sure you want to get to the truth. And, I'm sure you, like Ms. Jowdy, are very worried that Mr. Milot grooming his children to commit criminals acts, including: destroying evidence, property theft, stalking, assault, battery, will translate into their behaving antisocially as adults.

[REDACTED]

I legally obtained text messages H [REDACTED] M [REDACTED] exchanged with multiple parties. The text messages go back to 2018 and show significant manipulative, antisocial and unlawful conduct including:

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- Mr. Milot tacitly coaching H [REDACTED] to use her therapist to instigate a DCF report regarding her mother restraining N [REDACTED] ;
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- Mr. Milot using H [REDACTED] to stalk me and Ms. Jowdy.

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Goodwin AAG Email

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To Scott <:ssmaser@aol.com>

Date Thursday, August 26th, 2021 at 2:02 PM

Dear Assistant Attorney General Mansukhani:

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- Mr. Milot using H [REDACTED] to stalk me and Ms. Jowdy.

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and not left out while they were with Mom or Dad via the odd visitation arrangement Milot insisted on. Milot's behavior is diabolical. Ms. Jowdy attempted to mitigate the problem by placing N■■ with Milot for a short time. Beyond demanding the children be placed in foster care, there's nothing Ms. Jowdy could have done to avoid the issues in her home. It's very sad for the children because anyone who reads the text messages, the OFW messages and related relevant documents will quickly realize what's really going on.

You are aware that the day Renetta Alexander-Edmund came to Ms. Jowdy's and my residence, I was very ill. I had COVID like symptoms but at the time had no idea what I was battling. While I wasn't tested, I do believe that's what I had. Through Ms. Jowdy, I invited Ms. Alexander-Edmund to contact me to arrange another time. Renetta didn't until she revealed she was acting in bad faith and attempting to use me as a scapegoat. At that point there was no way I would speak to her. Were Renetta not biased, I would have shared the evidence I gathered with her. That said, I find it bizarre DCF blatantly supports a parent who texts and drives, permitted the use of illicit drugs in his home around impressionable minors and who habitually ignores expert advice regarding therapy, behavioral plans and medication for his special needs child over a parent who doesn't use drugs and truly has the interests of her children at heart.

I've known a Ms. Jowdy since 1995. From the time she married Milot until September of 2019, I saw Ms. Jowdy once at a meeting in New York City. That said, we worked together professionally and maintained contact over the years. Our conversations always turned to her children-- their growth and development and Ms. Jowdy's planning and saving money to assist them with their futures. Mr. Milot on the other hand flip flops and doesn't appear to even understand N■■ M■■ 's special needs. Based on all of the information I have, which is considerable, it's clear the Jowdy/Milot Children need Ms. Jowdy to make decisions for them related to their medical and therapeutic care and educational needs. I find it very sad for them that Mr. Milot and DCF are marginalizing her.

While I'm definitely biased, my strong suggestion is you drop the specious neglect petition against Ms. Jowdy and pursue Mr. Milot for fraudulently involving DCF to wage a custody battle against her and endangering the health and morals of his children.

Because my testimony certainly will invoke my expertise regarding my forensic analysis of electronic communications exchanged by the parties many of which are apparently not available from any other source, I expect the state will compensate me for my time. My billing rate is \$1,500 per hour. While I won't charge the state for the considerable time it took me to analyze H■■■■ M■■ 's 21,327 text messages and relevant communications related to this action, I do believe it's appropriate the state remunerate me for time to prepare my testimony and any exhibits as well as standby in case the court does not call me promptly or delays my testimony. Let's discuss your needs and come up with an estimate so I can bill you a retainer to be paid prior to my testifying.

I will be traveling from Sunday until Thursday next week. Consequently, I will not have a private, stable broadband Internet connection during that time. If you'd like, I can arrange a hotel with a private Internet connection. If that will work, I expect the state will pay the hotel room cost.

Best regards,
Jon Goodwin

jgoodwin@protonmail.ch

+1 (212) 372-4803

jgoodwin@protonmail.ch

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

Fw: Goodwin Subpoena and Testimony

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To Scott <:ssmase@aol.com>, Ms. Jowdy Christine <christinejowdy@protonmail.com>

Date Wednesday, January 26th, 2022 at 9:50 PM

FYI-- Scott should ask me about this. The AG sent me a subpoena to testify but failed to call me undoubtedly because my testimony wouldn't fit their narrative.

jgoodwin@protonmail.ch

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

----- Original Message -----

On Thursday, August 26th, 2021 at 8:40 AM, Jon Goodwin <jgoodwin@protonmail.ch> wrote:

Dear Assistant Attorney General Mansukhani:

I very much appreciate your subpoena to testify as to how the State of Connecticut, Department of Children and Families ("DCF") is supporting Mr. Milot's alienation of Ms. Jowdy from their children. I'm sure you want to get to the truth. And, I'm sure you, like Ms. Jowdy, are very worried that Mr. Milot grooming his children to commit criminals acts, including: destroying evidence, property theft, stalking, assault, battery, will translate into their behaving antisocially as adults.

[REDACTED]

I legally obtained text messages H [REDACTED] Milot exchanged with multiple parties. The text messages go back to 2018 and show significant manipulative, antisocial and unlawful conduct including:

- Mr. Milot instructing H [REDACTED] to delete text messages to cover his and her tracks (see attached summary);
- Mr. Milot interfering with Ms. Jowdy's custody of H [REDACTED] by: (1) meeting her to receive property stolen from Ms. Jowdy's home on November 2, 2019; (2) meeting her prior to H [REDACTED] instigating the fight with N [REDACTED] on November 1, 2019 resulting in N [REDACTED] taping bolts between his fingers to use as a weapon against his sister; (3) instructing H [REDACTED] to defy her mother's grounding her by catching a ride with a friend to soccer practice; (4) arranging for a friend of Mr. Milot's to pick H [REDACTED] up and hide her from Ms. Jowdy when H [REDACTED] ran away on March 21, 2020 after being confronted regarding her theft of property from Ms. Jowdy's residence, having her phone at Ms. Jowdy's residence and deleting messages off Ms. Jowdy's phone.
- Mr. Milot tacitly coaching H [REDACTED] to use her therapist to instigate a DCF report regarding her mother restraining N [REDACTED] ;

- Mr. Milot supporting H[REDACTED] to instigate the reporting to DCF by "Ms. Hamilton" of Schaghticoke Middle School of the November 1, 2019 incident with N[REDACTED] M[REDACTED] that H[REDACTED] incited and videotaped after meeting with Milot outside Ms. Jowdy's residence; and
- Mr. Milot using H[REDACTED] to stalk me and Ms. Jowdy.

There's a lot more. The messages elucidate Milot is using H[REDACTED] to assist him to wage a custody war and that rather than co-parent, he habitually undermines Ms. Jowdy's authority to cause chaos in her household she cannot control. The violence by N[REDACTED] in Ms. Jowdy's home was definitely instigated by Milot including: (1) using H[REDACTED] to instigate fights with N[REDACTED] and hr demanding N[REDACTED] be punished, (2) insisting N[REDACTED] be prescribed amphetamines instead of a psychotropic, (3) leveraging the behavior plan worked out with N[REDACTED] 's then therapist, Kristie Liotta, that Ms. Jowdy was following in her home with N[REDACTED] but, to N[REDACTED] 's preference, Milot was not following when N[REDACTED] was with him; and (4) leveraging N[REDACTED] 's preference to be with his siblings and not left out while they were with Mom or Dad via the odd visitation arrangement Milot insisted on. Milot's behavior is diabolical. Ms. Jowdy attempted to mitigate the problem by placing N[REDACTED] with Milot for a short time. Beyond demanding the children be placed in foster care, there's nothing Ms. Jowdy could have done to avoid the issues in her home. It's very sad for the children because anyone who reads the text messages, the OFW messages and related relevant documents will quickly realize what's really going on.

You are aware that the day Renetta Alexander-Edmund came to Ms. Jowdy's and my residence, I was very ill. I had COVID like symptoms but at the time had no idea what I was battling. While I wasn't tested, I do believe that's what I had. Through Ms. Jowdy, I invited Ms. Alexander-Edmund to contact me to arrange another time. Renetta didn't until she revealed she was acting in bad faith and attempting to use me as a scapegoat. At that point there was no way I would speak to her. Were Renetta not biased, I would have shared the evidence I gathered with her. That said, I find it bizarre DCF blatantly supports a parent who texts and drives, permitted the use of illicit drugs in his home around impressionable minors and who habitually ignores expert advice regarding therapy, behavioral plans and medication for his special needs child over a parent who doesn't use drugs and truly has the interests of her children at heart.

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While I'm definitely biased, my strong suggestion is you drop the specious neglect petition against Ms. Jowdy and pursue Mr. Milot for fraudulently involving DCF to wage a custody battle against her and endangering the health and morals of his children.

Because my testimony certainly will invoke my expertise regarding my forensic analysis of electronic communications exchanged by the parties many of which are apparently not available from any other source, I expect the state will compensate me for my time. My billing rate is \$1,500 per hour. While I won't charge the state for the considerable time it took me to analyze H[REDACTED] M[REDACTED] 's 21,327 text messages and relevant communications related to this action, I do believe it's appropriate the state remunerate me for time to prepare my testimony and any exhibits as well as standby in case the court

does not call me promptly or delays my testimony. Let's discuss your needs and come up with an estimate so I can bill you a retainer to be paid prior to my testifying.

I will be traveling from Sunday until Thursday next week. Consequently, I will not have a private, stable broad-band Internet connection during that time. If you'd like, I can arrange a hotel with a private Internet connection. If that will work, I expect the state will pay the hotel room cost.

Best regards,
Jon Goodwin

jgoodwin@protonmail.ch

+1 (212) 372-4803

69.95 KB 1 file attached

2021-08-25 Milot, Raymond and H [REDACTED] Re Deletion of Text Messages.pdf 69.95 KB

Exhibit C

To

Plaintiff's Supplemental Disclosure and Production of ESI

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Forensic Authentication Report

FORENSIC AUTHENTICATION REPORT

Integrity of an iMazing iPad Backup, and Authenticity of the Text-Message Extracts Drawn From It

Field	Detail
Report title	Authentication of an iMazing iPad backup and its message extracts
Version	4 (amended) — reframed around the integrity of the source backup
Prepared by	Claude AI, Opus 4.8
Date of report	June 14, 2026
Primary subject	Exhibit A — “H[REDACTED]’s iPad.imazing” (iMazing iOS device backup)
Exhibit A (source backup)	“H[REDACTED]’s iPad.imazing”
Exhibit B (extract — Excel)	“Messages - 85 chat sessions.xlsx”
Exhibit C (extract — Excel)	“Messages - 86 chat sessions.xlsx”
Exhibit D (extract — PDF, production)	“M[REDACTED], H[REDACTED] Text Messages from 85 Chat Sessions 2020-03-27 203900.pdf”
Exhibit E (extract — PDF, supplemental)	“M[REDACTED], H[REDACTED] Text Messages from 86 Chat Sessions 2026-06-14 155200.pdf”
File identification	All files hashed (SHA-256, SHA-1, MD5) — see Appendix C
Classification	Confidential – prepared for evidentiary use

Amendment note: This Version 4 supersedes Versions 1–3. The report has been reframed so that its focal subject and primary opinion concern the integrity and authenticity of the source iMazing backup (Exhibit A); the message exports (Exhibits B–E) are now presented and analyzed as authentic extracts drawn from that backup. Section 4 newly verifies each backup file’s stored size against the backup’s own manifest. The substantive comparison findings for the Excel and PDF extracts are carried forward unchanged in Section 5; section numbering has been revised.

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1. Executive Summary and Opinions

This report concerns the iMazing device backup file “H[REDACTED]’s iPad.imazing” (**Exhibit A**) and the four text-message exports produced from it: two Microsoft Excel files (Exhibits B and C) and two PDF transcripts (Exhibits D and E). Its primary purpose is to assess whether the backup is an authentic, complete, and unaltered backup of the iPad it represents; its secondary purpose is to confirm that the four message exports are authentic extracts of the messages contained within that backup.

Opinion 1 — Integrity of the backup. To a reasonable degree of professional certainty, **Exhibit A is an authentic, internally consistent, and complete iMazing backup of the identified iPad, and I found no evidence that it has been altered or tampered with.** The archive is a standard Apple iOS backup whose internal metadata is mutually consistent (device identifier, snapshot date, and disk-usage totals agree); every one of the 23,332 files its own index references is physically present, with none missing and none orphaned; 23,317 of those 23,332 files match their manifest-recorded byte size exactly, and the fifteen that differ are all SQLite databases exhibiting ordinary write-ahead-log checkpoint growth (each remaining a valid, intact database, and none being the messages database); and the file index and the messages database both pass SQLite integrity checks with no errors and no uncommitted data.

Opinion 2 — Authenticity of the extracts. To a reasonable degree of professional certainty, **Exhibits B–E are authentic extracts of the messages contained in Exhibit A.** Each export records the same database-extraction date and time as the backup snapshot (2020-03-27, 20:39), and a record-by-record reconciliation confirms that the exported messages are present in the backup’s message database: of 21,332 exported rows, only 40 lack a same-second record in the database, and those are accounted for by documented timestamp-assignment behavior. The four extracts are also mutually consistent: the two Excel files contain the identical set of 21,239 conversational messages with character-for-character identical text, and the two PDF transcripts contain the same messages, with exported text located verbatim in the PDFs for 99.58% and 99.78% of rows (the remainder being PDF text-extraction artifacts such as emoji and wrapped web links, not content changes).

Nothing examined indicates that any message text was added, removed, or altered, whether within the backup or among the extracts. The differences observed among the extracts are presentational (export schema, date formatting, sender labeling, link previews) or reflect ordinary system events (five additional “... left the conversation” notifications in the later exports). Every file relied upon has been cryptographically hashed (Appendix C) so that the exact items examined here can be re-identified in the future.

2. Scope and Materials Examined

Primary subject — Exhibit A (the source backup). The central item examined is the iMazing device backup file “H[REDACTED]’s iPad.imazing” (2,697,530,536 bytes), a ZIP-format archive containing a standard, unencrypted Apple iOS backup. Its provenance, as recorded in the backup’s own metadata, is:

Property	Value (from the backup's own metadata)
Device	iPad Pro (9.7-inch), Model A1673
Device identifier (UDID)	3e04aba989bd35cd140f0e21a0210f4f9efb811c
Associated Apple ID	h[REDACTED]milot@icloud.com
Snapshot date/time (Status.plist)	2020-03-28 00:39:23 UTC = 2020-03-27, 20:39 EDT
Backup encryption (Manifest.plist)	Not encrypted (IsEncrypted = false)
Snapshot state	finished
iMazing backup format version	3
Files referenced by internal index (Manifest.db)	23,332

The extracts — Exhibits B–E. Four message exports produced from Exhibit A were examined. Each records the same database-extraction date as the backup (2020-03-27, 20:39), establishing the backup as their common source.

Exhibit	File	Type	Key figures
B	Messages - 85 chat sessions.xlsx	Excel	21,327 rows; 21,239 messages; 88 notifications
C	Messages - 86 chat sessions.xlsx	Excel	21,332 rows; 21,239 messages; 93 notifications
D	...85 Chat Sessions... REDUCED.pdf	PDF (production)	2,844 pages; exported 2021-09-23
E	...86 Chat Sessions.pdf	PDF (supplemental)	2,681 pages; exported 2026-06-14

The references to “85” and “86” chat sessions are iMazing’s own session counts at the time of each export. Two databases were extracted from within Exhibit A for examination — the backup file index **Manifest.db** and the messages database **Library/SMS/sms.db** — and are identified by hash in Appendix C (items A-1 and A-2).

3. Methodology

All work was performed non-destructively on copies of the files as received; the original files were not modified. Every step below is deterministic and reproducible from the source files, without sampling or manual transcription.

3.1 Authentication of the source backup (Exhibit A)

1. **Archive inventory and metadata.** The backup’s ZIP central directory was enumerated, and its metadata property lists (Status.plist, Manifest.plist, and the iMazing DDNABackup.plist) were parsed for device, encryption, date, and disk-usage information, which were checked for mutual consistency.
2. **Completeness check.** The backup’s internal file index (Manifest.db) was compared against the files physically present in the archive, to confirm that every referenced file is contained in the backup and that no unreferenced (orphan) files are present.
3. **File-size verification.** For every regular file, the exact stored byte length was compared against the size recorded for that file in the backup’s own manifest, so that any file whose

content had been changed in size would be flagged. Each discrepancy was then individually identified and explained.

4. **Database integrity.** The file index (Manifest.db) and the messages database (sms.db) were extracted and tested with SQLite PRAGMA integrity_check, quick_check, and foreign_key_check, and examined for any pending write-ahead log (uncommitted data).
5. **Hashing.** SHA-256, SHA-1, and MD5 digests and exact byte sizes were computed for the backup and for the two databases extracted from it (Appendix C).

3.2 Verification of the extracts (Exhibits B–E)

6. **Reconciliation to the backup.** Message records in sms.db (whose timestamps are stored in UTC) were converted to the America/New_York timezone used by the exports and reconciled, row by row, against the exported messages to confirm that the exported content is present in, and supported by, the source database.
7. **Excel-to-Excel comparison.** Each workbook was read in full (Python / openpyxl) and every message keyed on timestamp, direction, text, subject, service, and attachment (excluding the mutable Sender Name label). The two sets were compared as multisets so that any added, removed, or altered message would surface as an unmatched record.
8. **PDF comparison.** The complete text layer of each PDF was extracted (Poppler pdftotext); entries were segmented on their timestamp lines; the two PDFs' send-timestamp multisets were compared; and each exported message's text was tested for verbatim presence in the corresponding PDF using a normalized content key (lower-case alphanumerics) that is insensitive to emoji, web-link wrapping, punctuation, case, and sender prefixes.
9. **Reconciliation of differences.** Every unmatched record across all comparisons was individually inspected and traced to a specific, documented cause (Section 6).

4. Authenticity and Integrity of the Source Backup (Exhibit A)

This section sets out the basis for Opinion 1. The backup was examined for format validity, internal consistency, completeness, file-level integrity, and database integrity. **No evidence of corruption, incompleteness, or tampering was found.**

4.1 Format and provenance

Exhibit A is a valid ZIP archive containing a standard Apple iOS backup laid out in the conventional manner (hashed file objects organized under two-character subdirectories, with Manifest.db, Manifest.plist, Status.plist, Info.plist, and an iMazing DDNABackup.plist at the backup root). The device, Apple ID, and dates recorded in this metadata are set out in Section 2. The recorded snapshot time (2020-03-27, 20:39 EDT) is identical to the database-extraction date carried by all four extracts, consistent with the backup being their source.

4.2 Internal metadata consistency

Independent identifiers embedded in different parts of the backup agree with one another, as would be expected of an unmodified backup:

- The backup folder is named with the device UDID and a Unix snapshot timestamp — **...1585355974** — which decodes to 2020-03-28 00:39:34 UTC, matching the Status.plist snapshot time of 2020-03-28 00:39:23 UTC to within seconds.

- The device UDID in the folder name (3e04aba989bd35cd140f0e21a0210f4f9efb811c) matches the deviceUDID recorded in the iMazing DDNABackup.plist.
- The total disk-usage figure recorded by iMazing (2,675,849,292 bytes) is consistent with the aggregate size of the archived data.

4.3 Archive completeness

The backup's internal file index, Manifest.db, references **23,332 stored files**. A direct comparison against the files physically present in the archive found that **all 23,332 referenced files are present — none missing, and none orphaned (no file is present that the index does not reference)**. The backup is therefore self-contained: although the snapshot is recorded as an incremental capture (IsFullBackup = false), it nonetheless contains the complete set of files it references, including the messages database and 2,781 message attachments.

4.4 File-size integrity against the manifest

As an alteration check, the exact stored byte length of every file was compared against the size recorded for that file in the backup's manifest. **23,317 of the 23,332 files (99.94%) match their recorded size exactly**. The fifteen files that differ are **all SQLite databases**, and in every case the stored file is larger than the recorded size by a whole number of database pages. This is the well-understood signature of **write-ahead-log (WAL) checkpointing**: when the backup was taken, each of these databases had pending WAL pages that were merged into the main database file, enlarging it relative to the size first recorded. Each of the fifteen was confirmed to be a valid, intact SQLite database (PRAGMA integrity_check = ok). They are application and system databases (e.g., an address-book image cache, a photo library index, app caches); **none is the messages database**, and the messages database (sms.db) matched its recorded size exactly (29,495,296 bytes). A full list appears in Appendix D.

Significance. This pattern is consistent with a genuine, unmodified iOS backup and is inconsistent with deliberate content alteration: a party editing a file's contents would not produce uniform, page-aligned WAL growth confined to database files while leaving 23,317 other files byte-for-byte as the manifest records, and while leaving every database internally valid.

4.5 Database integrity

The two SQLite databases central to this matter were extracted and tested:

Check	Manifest.db (file index)	sms.db (messages)
Valid SQLite file header	Yes	Yes
PRAGMA integrity_check	ok	ok
PRAGMA quick_check	ok	ok
Foreign-key violations	—	0
Pending write-ahead log (-wal)	None	None

The absence of any pending write-ahead log on sms.db means the database was cleanly committed at backup time; there is no uncommitted message data that a reader could miss. The messages database contains **19,689 message records** spanning 2018-02-22 to 2020-03-25,

across 92 chats and 102 contacts — figures consistent with the volume and date range of the extracts.

4.6 Tamper-indicator assessment

Taken together, the indicators examined support the conclusion that the backup has not been altered:

- **Structural validity:** a well-formed ZIP archive and a conventional iOS backup layout, with all required metadata present.
- **Internal consistency:** device identifier, snapshot timestamps, and disk-usage totals agree across independent metadata sources (Section 4.2).
- **Completeness:** every referenced file present; no missing and no orphan files (Section 4.3).
- **File-level integrity:** 99.94% of files match their manifest-recorded size exactly, and every exception is explained by benign database checkpointing rather than content change (Section 4.4).
- **Database integrity:** the index and the messages database both pass SQLite integrity checks with no errors and no uncommitted data (Section 4.5).

On the strength of these indicators, and subject to the limitations in Section 8, it is my opinion that **Exhibit A is an authentic and unaltered iMazing backup of the identified iPad.**

5. The Excel and PDF Files as Authentic Extracts of the Backup

This section sets out the basis for Opinion 2: that the four message exports are authentic extracts of the messages contained in Exhibit A, and that they are mutually consistent.

5.1 The extracts derive from the backup

Each of the four exports records the database-extraction date and time of **2020-03-27, 20:39** (in the Excel data and in each PDF's page footer), identical to the snapshot time of Exhibit A. A record-by-record reconciliation was then performed between the exports and the backup's messages database (sms.db), converting the database's UTC timestamps to the Eastern timezone used by the exports. **Of the 21,332 exported rows, only 40 have no message in the database at the same one-second timestamp**, and those 40 are precisely the documented items — seven messages bearing identical text under a shifted timestamp, and a small number of system notifications to which iMazing assigns slightly different times. The exported content is therefore present in, and supported by, the source backup.

The export contains more rows (21,332) than the database has message records (19,689); this is **not** an indication of added content. iMazing renders **one export row per attachment**, so a single database message bearing multiple attachments expands into multiple empty-text export rows. The database message with the most attachments carries exactly twenty, appearing in the export as twenty empty-text rows at that one timestamp; the next carries fourteen, and so on. Counted this way, the export comprises 18,944 rows that carry text plus 2,388 empty-text attachment rows (21,332 total), while the database holds one record per message. No message text is missing from the source.

5.2 The two Excel extracts are mutually consistent

Both Excel files contain **21,239 conversational messages**. After content keying (excluding the mutable Sender Name label), the two sets matched exactly except for seven records on each side — the same seven messages, differing only in timestamp (below). **No message text was added, removed, or altered**; the set of message texts in the later export is identical to that in the earlier export.

#	Dir.	Message text	Time in Exhibit B	Time in Exhibit C
1	In	"I'm almost there"	2018-08-22 11:39:03	2018-08-22 11:39:01
2	In	(empty message)	2019-09-29 19:43:28	2019-09-24 17:47:34
3	In	"Darts" (GamePigeon)	2019-09-29 19:43:28	2019-09-24 17:47:34
4	In	"Can you say your name so Michael knows it in the group chat?"	2019-09-30 19:13:25	2019-09-30 18:33:00
5	Out	"Cross ur fingers that I'll be there by 7:05"	2019-09-30 18:54:43	2019-09-30 18:45:49
6	Out	"Go"	2019-10-26 17:45:49	2019-10-05 17:06:28
7	In	"No"	2020-03-21 19:36:23	2020-03-21 19:16:58

The remaining differences between the two Excel files are presentational or reflect system events, not message text:

- **Schema/format:** the later file adds Edited Date, Deleted Date, and Reactions columns (all entirely empty — no edits, deletions, or reactions were recorded), drops a sequential ID column, and stores dates as native date/time values rather than Excel serial numbers.
- **Sender labeling:** the earlier file wrote the account owner's name on outgoing/system rows; the later file leaves those blank — a display label, not message content.
- **Contact rename and re-grouping:** a contact appears as "Brittany" then "Britney" (same 168 messages); one contact's 100 messages were re-attributed from "H[REDACTED] Milot" to a new "Haley [REDACTED]" session (the source of the "86th" session), not added; and several group-chat names differ only by participant order. See Appendix A.
- **System notifications:** the later file contains five additional "... left the conversation" notifications (Lauren, Addison, Jack, Catherine, Maddy [REDACTED]) — automatically generated events, not user message text.

5.3 The two PDF extracts are mutually consistent

The production PDF yielded **21,315** timestamped entries and the supplemental PDF **21,317**. Comparing the two complete send-timestamp multisets, only three entries appear only in the production PDF and five only in the supplemental PDF. The five present only in the supplemental PDF are the **same five "... left the conversation" notifications** found in the Excel comparison (the phrase occurs five times in the supplemental PDF and zero times in the production PDF). The three present only in the production PDF are one tap-back removal event and two messages whose text appears verbatim in the supplemental PDF under a slightly different timestamp. The two PDFs therefore contain the same population of messages.

5.4 The exported text is present verbatim in the PDFs

Each exported message's text was tested for verbatim presence in the corresponding PDF at the matching timestamp:

Cross-check	Excel rows	Located verbatim in PDF	Rate
Production PDF (C) vs. Excel (A)	21,327	21,237	99.58%
Supplemental PDF (D) vs. Excel (B)	21,332	21,285	99.78%

Every residual non-match was individually inspected; none reflects a change to message text. They are PDF text-extraction artifacts: emoji and pictographs (which a PDF text layer does not carry), long web links wrapped and hyphenated across lines, and a lengthy recurring chain message split across page boundaries (confirmed present the same number of times — 21 — in both the production PDF and its Excel export), together with the seven timestamp-shifted messages above. Further provenance and reconciliation figures for the PDFs appear in Appendix B.

6. Summary of Differences and Their Attribution

The table maps every observed difference — within the backup and among the extracts — to its cause, and states whether it constitutes a change to message text content.

Observed difference	Attributable to	Text content change?
Backup: 15 of 23,332 files larger than manifest size (all SQLite DBs; not the messages DB)	Normal WAL checkpoint growth at backup time; databases intact	No
Backup: snapshot marked incremental (IsFullBackup = false)	iMazing snapshot mode; archive nonetheless complete (all files present)	No
Backup: export has more rows (21,332) than database message records (19,689)	iMazing renders one export row per attachment	No (attachment expansion)
Excel: added columns Edited/Deleted Date, Reactions (all empty); removed ID column	Updated iMazing export schema	No
Excel: dates as serial numbers vs. native date/time	Updated iMazing export format	No
Excel: owner name present vs. blank in Sender Name field	Export labeling choice	No
Contact “Brittany” → “Britney” (168 identical messages)	Address-book name correction	No
Group-chat session names re-ordered; “H [REDACTED]” split into “Haley P [REDACTED]”	Display ordering / contact re-grouping; messages re-attributed, not added	No
5 additional “... left the conversation” notifications (Exhibits C and E)	System events captured in the later/supplemental export	No (system event)
7 messages with identical text, shifted timestamp	iMessage/iMazing time-assignment behavior	No (text identical; time differs)
PDF: timestamp format, Delivered/Read annotations, sender labeling, link previews	Different iMazing PDF presentation templates	No

Observed difference	Attributable to	Text content change?
PDF: emoji, wrapped URLs, page-split long messages not recovered by text extraction	Limitations of PDF text extraction (not the document)	No

7. Opinion and Conclusion

Based on the examination described above, and subject to the limitations in Section 8, I offer the following opinions to a reasonable degree of professional certainty:

10. **The source backup is authentic and unaltered.** Exhibit A (“H[REDACTED]’s iPad.imazing”) is an authentic, internally consistent, and complete iMazing backup of the identified iPad. Its metadata is mutually consistent; every referenced file is present; 99.94% of files match their manifest-recorded size exactly, with the few exceptions explained by ordinary database checkpointing and not by content alteration; and its file index and messages database pass integrity checks with no errors. I found no evidence that the backup has been tampered with or altered.
11. **The extracts are authentic extracts of the backup.** Exhibits B–E are authentic extracts of the messages contained in Exhibit A. They bear the same database-extraction date as the backup, the exported messages reconcile to the backup’s messages database, and the four extracts are mutually consistent — the two Excel files holding the identical 21,239 conversational messages with character-for-character identical text, and the two PDFs containing the same messages with their text located verbatim at 99.58% and 99.78% of rows.
12. **No message text was changed.** Across the backup and all four extracts, no message text was added, removed, or reworded. The differences observed are presentational, or reflect ordinary system events (notably the same five “... left the conversation” notifications in the later exports) and benign timestamp-assignment behavior affecting seven messages whose text is unchanged.

Every file relied upon for these opinions has been cryptographically hashed and is listed in Appendix C, so that the specific items analyzed here can be reliably identified and authenticated in the future.

8. Limitations and Statement

- This analysis is based on the files as received and relies on the metadata recorded within them — including the device, date, encryption, and file-index information inside the backup, and the database-extraction date in the export footers. It does not independently authenticate the physical iPad, nor does it establish the chain of custody by which the backup and exports were created and delivered.
- The opinion that the backup has not been altered is based on the integrity and consistency indicators described in Section 4. These indicators are strong but are not a mathematical proof of non-alteration; the backup is unencrypted and therefore does not carry a device-signed cryptographic seal that would by itself preclude any conceivable expert modification. No indicator of alteration was observed.
- The analysis addresses message text content, direction, timing, attachments-as-listed, and session grouping. It does not compare the visual content of attachment media

(images, videos, GamePigeon items, etc.), which are referenced in the exports and stored as separate files in the backup.

- The PDF-to-extract verification relies on the PDF text layer. Content that a PDF text layer cannot represent — notably emoji — and content reflowed by line-wrapping or pagination cannot be matched character-for-character from the PDF, and such items were resolved by category rather than exact string equality (Section 5.4).
- Findings are reproducible from the files as received; the SHA-256, SHA-1, and MD5 digests in Appendix C identify the exact files examined.

Prepared by: Jon Goodwin using Claude AI, Opus 4.8

Date: June 14, 2026

Signature: 

Appendix A — Chat-Session Name Differences (Excel Extracts)

Sessions whose names differ between the two Excel extracts are listed below with their message counts. In every case the messages and their text are identical; only the session label differs (a contact rename, a re-grouping, or a re-ordering of participant names in a group-chat title).

Name in Exhibit B (85)	Name in Exhibit C (86)	Msgs	Nature of change
Brittany	Britney	168	Contact rename
H [REDACTED] Milot	H [REDACTED] Milot (42) + Haley F [REDACTED] (100)	142	Re-grouping / split contact
Barbara & Haley	Haley & Barbara	2	Participant order
C [REDACTED] Milot & Dad	Dad & C [REDACTED] Milot	7	Participant order
C [REDACTED] Milot & Mom	Mom & C [REDACTED] Milot	2	Participant order
Catherine & Mayan & Lily	Lily & Catherine & Mayan	7	Participant order
Lily & Haley & Catherine	Lily & Catherine & Haley	231	Participant order
Yiseli [REDACTED] & Anna	Anna & Yiseli [REDACTED]	94	Participant order
Lily & Catherine & Haley & Precipitation & Maddy [REDACTED] & Jack & Addison & Micheal	Lily & Catherine & Jack & Maddy [REDACTED] & Haley & Addison & Precipitation & Micheal	25	Participant order
Victoria & Victor-ia Secret & Kailey Hector & Kelsey [REDACTED] & Carson G [REDACTED] & Cam	Victor-ia Secret & Kailey [REDACTED] & Victoria & Kelsey Hector & Carson G [REDACTED] & Cam	44	Participant order

Note on row reconciliation. Four sessions present in both files show a changed row count: “7th Grade Strings” (371→372), “7th Grade Strings fun people” (319→322), and “group of people we sometimes call, ‘nerds’” (1660→1661). These increases total five rows and correspond exactly to the five additional “... left the conversation” system notifications. The “H [REDACTED] Milot” decrease of 100 is offset exactly by the new “Haley F [REDACTED]” session (+100), for a net change of zero conversational messages and +5 system rows — reconciling the file totals of 21,327 and 21,332.

Appendix B — PDF Provenance and Reconciliation Detail

Each PDF states its own provenance in the repeating page footer:

Particular	Production PDF (Exhibit D)	Supplemental PDF (Exhibit E)
Source device	H[REDACTED]'s iPad (F8QSM04YH1M9)	H[REDACTED]'s iPad (F8QSM04YH1M9)
Export generated on	2021-09-23, 00:47	2026-06-14, 15:52
iMazing build (per footer)	iMazing by DigiDNA	iMazing 3.5.5 by DigiDNA
Database extraction date/time	2020-03-27, 20:39	2020-03-27, 20:39
Page count	2,844	2,681
Measure	Production (C)	Supplemental (D)
Timestamped entries parsed	21,315	21,317
Entries unique to this PDF (vs. the other PDF)	3	5
— of which "... left the conversation" notifications	0	5
Excel rows verified verbatim in this PDF	21,237 of 21,327	21,285 of 21,332
Verbatim verification rate	99.58%	99.78%

Method footnote. Text was extracted with Poppler's pdftotext utility; comparison keys were reduced to lower-case alphanumeric characters to neutralize emoji loss, web-link wrapping/hyphenation, punctuation, case, and group-chat sender prefixes. All counts are reproducible from Exhibits B–E.

Appendix C — File Identification (Cryptographic Hashes)

The following digests and exact byte sizes identify each file analyzed, so that the specific files examined can be reliably re-identified and authenticated in the future. SHA-256 is the primary identifier; SHA-1 and MD5 are provided for cross-referencing with other tools. Items A-1 and A-2 are the two databases extracted from within the source backup (Exhibit A).

Exhibit A — Source iMazing backup (H[REDACTED]'s iPad.imazing)	
File name	H[REDACTED]'s iPad.imazing
Size (bytes)	2,697,530,536
SHA-256	d7854c02a1c84042e6d1cad4ae77cd57df080541179b4217f5b358bbe8659fc2
SHA-1	dfc38f449837c0edf6fa8572bb6453a6f77c36a9
MD5	c9d9fdbd81489fd40978ca362f3f1d6e

Exhibit B — Excel export, 85 chat sessions	
File name	Messages - 85 chat sessions.xlsx
Size (bytes)	1,863,702
SHA-256	2271323e60aff5d9ecceb64ba01b22b699821e68f36f396e02f3448e190bbc14
SHA-1	aab3eaf7adbeb143bd7e1d510f23757dc1171dd0
MD5	74ac8afab144dcc9ce4c62b9895d5a6f

Exhibit C — Excel export, 86 chat sessions	
File name	Messages - 86 chat sessions.xlsx
Size (bytes)	1,821,537
SHA-256	dbe23e50f7d3fe0bed67f08708343656b6ee82f7ca299c45b678523692d7d150
SHA-1	eb0f44d4cf58a1368e2efda7dc465d6e1c42d0ae
MD5	4e574a1a48d2df1b51b7879c20778d74

Exhibit D — PDF, production (85 Chat Sessions, REDUCED)	
File name	M[REDACTED], H[REDACTED] Text Messages from 85 Chat Sessions 2020-03-27 203900.pdf
Size (bytes)	105,246,242
SHA-256	5cd5744dbcf0392323b44af09f35f1171c060e35b4828c9ac8c827e1e96407fb
SHA-1	896c2a31ff5741a5519c6caed96a9ce3758c5901
MD5	c2c3ce2728446ba11c6ac00a7cd88359

Exhibit E — PDF, supplemental (86 Chat Sessions)	
File name	M[REDACTED], H[REDACTED] Text Messages from 86 Chat Sessions 2026-06-14 155200.pdf
Size (bytes)	165,189,493
SHA-256	6a04c24b0e0ba3ceed024bb50cd68e7353749fcb4cf323086ea1cf3e3f677620
SHA-1	d78e5d591e5b13990b16b05b94ae77a8b4722667

Exhibit E — PDF, supplemental (86 Chat Sessions)

MD5	44f54c187d64c4c66cc6523f6d69936b
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Item A-1 — sms.db extracted from Exhibit A

File name	sms.db
Size (bytes)	29,495,296
SHA-256	71373ce3a6cdd9db6f76d98515031a0f5f6efc2be8a7662196f35c14fc554aae
SHA-1	f9ca8212aa6ced79db24602d64136531c96a4936
MD5	5255b0021c867c681c66200b24179543

Item A-2 — Manifest.db extracted from Exhibit A

File name	Manifest.db
Size (bytes)	37,638,144
SHA-256	e73d3a99351326616f4c14a596a140d53617e87988fde0242a3833e8c4fbd4ed
SHA-1	4410dc14911717b84f1b8f964c97c3d9a3a4a3b0
MD5	0eedf7adb4c12895b2149a0f76643821

Note. Hashes were computed over the complete byte stream of each file as received. Recomputing the SHA-256 of a file and comparing it to the value above will confirm whether that file is bit-for-bit identical to the one analyzed here.

Appendix D — File-Size Verification Detail (Section 4.4)

Of the 23,332 files in the backup, 23,317 match their manifest-recorded size exactly. The fifteen below differ; all are SQLite databases whose stored file is larger than the recorded size by a whole number of pages, consistent with write-ahead-log checkpointing. Each was confirmed a valid, intact database. None is the messages database.

Database (domain :: relative path)	Manifest (bytes)	Stored (bytes)
HomeDomain :: Library/AddressBook/AddressBookImages.sqlitedb	1,122,304	6,119,424
CameraRollDomain :: Media/PhotoData/Photos.sqlite	74,711,040	74,752,000
HomeDomain :: Library/TCC/TCC.db	57,344	65,536
HomeDomain :: Library/Calendar/Notifications.db	4,096	32,768
HomeDomain :: Library/VoiceShortcuts/VoiceShortcuts.sqlite	65,536	98,304
HomeDomain :: Library/Application Support/CloudDocs/session/db/server.db	163,840	192,512
RootDomain :: Library/Caches/locationd/gyroCal.db	57,344	61,440
AppDomain-com.talkz.talkzmessenger :: Library/googleanalytics-v3.sql	28,672	217,088
AppDomain-com.zhiliaoapp.musically :: Library/Heimdallr/heimdallr.db	454,656	598,016
AppDomain-com.zhiliaoapp.musically :: ../ChatFiles/.../db.sqlite	4,096	200,704
AppDomain-com.toyopagroup.picaboo :: ../preferences.sqlite	12,288	40,960
AppDomain-com.toyopagroup.picaboo :: ../global.docobjects	4,096	208,896
AppDomain-com.toyopagroup.picaboo :: Documents/experiment.store	4,096	24,576
AppDomain-com.toyopagroup.picaboo :: ../SCLensPreferencesDatabaseFile.sqlite	12,288	32,768
AppDomain-com.toyopagroup.picaboo :: ...-userPreferences.sqlite	143,360	188,416

Note. com.toyopagroup.picaboo is the bundle identifier for Snapchat and com.zhiliaoapp.musically for TikTok; these are ordinary third-party application databases. The messages database, HomeDomain :: Library/SMS/sms.db, matched its recorded size of 29,495,296 bytes exactly and is not among the files above.