CASE NO.:

COURT OF APPEAL, STATE OF CALIFORNIA
FOURTH APPELLATE DISTRICT,
DIVISION THREE

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, and DAVID CURLEE,

Petitioners,

-vs-

SUPERIOR COURT OF THE STATE OF CALIFORNIA,

COUNTY OF ORANGE,

Respondent.

CITY OF FULLERTON,

Real Party in Interest.

EMERGENCY STAY REQUESTED TO VACATE PRIOR RESTRAINT

Granted in Response to the Real Party In Interest's
Ex Parte Application for a Temporary Restraining Order
Case No. 30-2019-01107063-CU-NP-CJC
The Honorable Thomas A. Delaney, Judge - (657) 622–5224

PETITION FOR ALTERNATIVE AND PEREMPTORY WRITS OF MANDAMUS, PROHIBITION, AND REVIEW MEMORANDUM IN SUPPORT OF PETITION; APPENDIX OF SUPPORTING EXHIBITS

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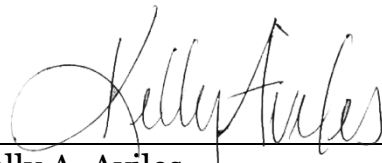
CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

PURSUANT TO CALIFORNIA RULES OF COURT, RULE 8.208

Petitioners Friends for Fullerton's Future, Joshua Ferguson, and David Curlee are not aware of any other entity or person that has a financial or other interest in the outcome of the proceedings that Petitioners reasonably believes the justices should consider in determining whether to disqualify themselves under canon 3E of the Code of Judicial Ethics.

DATED: October 30, 2019

LAW OFFICES OF KELLY A. AVILES



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TO THE HONORABLE PRESIDING JUSTICE AND ASSOCIATE JUSTICES OF THE COURT OF APPEAL OF THE STATE OF CALIFORNIA, FOURTH APPELLATE DISTRICT, DIVISION THREE:

Defendants Friends for Fullerton's Future, Joshua Ferguson, and David Curlee respectfully request that this Court intervene immediately to vacate an unconstitutional prior restraint issued by Respondent Orange County Superior Court ("Trial Court") in response to an *Ex Parte* Application filed by Real Party in Interest City of Fullerton.

The City's requested relief and the Trial Court's temporary restraining order violate the basic constitutional proscription against government censorship of the press. It is well-established that an "order enjoining publication…is *a classic prior restraint*," and is "*presumptively invalid*." (*South Coast Newspapers v. Superior Court* (2000) 85 Cal.App.4th 866, 869-870 (emphasis added).) As this Court explained in issuing a peremptory writ dissolving a similar prior restraint against a newspaper, "[e]very moment's continuance of [such an order] amounts to a flagrant, indefensible, and continuing violation of the First Amendment." (*Freedom Communications v. Superior Court* (2008) 167 Cal.App.4th 150, 153.) The Trial Court's order cannot stand, and should be vacated immediately.

INTRODUCTION

Defendant Friends for Fullerton's Future maintains a website, https://www.fullertonsfuture.org/, (the "Blog"), which is dedicated to covering news, politics, police activity, and government affairs in

the City of Fullerton. The Blog has many contributors, including Defendants Joshua Ferguson and David Curlee, as well as others who post anonymously, likely out of fear of retaliation by the City or its police department. Over the years, the Blog has uncovered and reported on numerous instances of questionable conduct by those in power in the City. Some of its reporting has led to investigations, resignations, and legal charges, and many of its stories have been picked up by other, larger media publications.[1]

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[1] For example, the Blog's investigation and reporting on City Manager Joe Felz auto accident led to DUI charges and a plea for reckless driving (https://www.fullertonsfuture.org/2016/city-manager-felz-involved-in-potential-dui-accident-after-election-night-celebration/; https://ocweekly.com/fullerton-city-manager-involved-in-post-election-party-car-crash-smelled-of-alcohol-7663250-2/); https://voiceofoc.org/ 2017/12/former-fullerton-city-manager-pleads-guilty-to-reckless-driving-in-2016-election-night-car-crash/; https://losangeles.cbslocal.com/2017/03/03/former-fullerton-city-manager-charged-with-dui-months-after-he-was-accused-of-getting-special-treatment/) and the termination of Fullerton Sergeant Jeff Corbett for covering up the Felz incident (*see* https://www.fullertonsfuture.org/2018/complaint-against-officers-involved-in-felz-dui-coverup-sustained/); charges against a City Council candidate and Mayor's wife Paulette Chaffee (https://www.fullertonsfuture.org/2018/is-doug-chaffee-under-investigation/; https://www.ocregister.com/2018/10/17/ fullerton-city-council-candidate-withdraws-after-allegations-of-sign-theft-and-carpetbagging/); the resignation of Police Chief David Hendricks and Police Captain Thomas Oliveras (https://www.fullertonsfuture.org/2018/trouble-at-the-police-department/); https://www.fullertonsfuture.org/2018/this-is-why-chief-hendricks-resigned/); criminal investigations into a political candidate for voter fraud (https://www.ocregister.com/2010/03/19/blogger-asks-da-to-investigate-sidhus-address/); exposure of an officer arrested for theft in Florida (https://www.fullertonsfuture.org/2011/fullerton-cop-arrested-for-stealing-ipad-at-tsa-checkpoint/); and conflicts at the District Attorney's office which led an ADA to be put on admin leave

Over the past few years, Mr. Ferguson and Mr. Curlee have made a number of California Public Records Act ("CPRA") requests seeking information in the course of their reporting for the Blog. (Klein Decl., ¶ 13.) To disclose documents responsive to various CPRA Requests, including those made by Defendants, the City uses Dropbox, a file hosting platform that allows users to store and share files. (Klein Decl., ¶ 7.) The City sent links to the City's Dropbox, www.CityOfFullerton.com/outbox, to Mr. Ferguson, Mr. Curlee, and others, (Klein Decl., ¶¶ 11; Exs. A, E.) The City now claims that the Dropbox account contained thousands of documents it did not intend to publicly disclose, despite the fact that many of the folders were identified with the Defendant's names, initials, or email address. (Klein Decl., ¶¶ 16, 17). The City filed this lawsuit claiming the Blog illegally accessed documents contained on the City's Dropbox account, demanding the return of the documents and a restraint on the Blog from publishing any documents that were obtained from the City's Dropbox account.[2]

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and under investigation (https://www.fullertonsfuture.org/2019/a-different-flory-problem/).

[2] While the City claims the documents it placed in its Dropbox account that are now subject to the TRO, were confidential, documents pertaining to the conduct of the public's business are presumptively public and disclosable under the CPRA. (*Sander v. State Bar* (2013) 58 Cal.4th 300, 323 [CPRA "establishes a presumptive right of access to any record created or maintained by a public agency that relates in any way to the business of the public agency..."].) Even if the some of the documents contained in the City's Dropbox account did contain confidential and/or arguably exempt information, it is the City's burden to point to the particular documents and justify why they are exempt from disclosure. (Govt' Code § 6255 ["[t]he agency shall justify withholding any record by

On an *ex parte* basis, without the notice required by California Rules of Court Rule 3.1203 and over the objections of Defendants' counsel, the Trial Court issued a temporary restraining order prohibiting the "[s]elling, publishing, distributing, disclosing or otherwise using any of the information or documents obtained from the City Dropbox folders" and "[c]onspiring with third parties to sell, publish, distribute, disclose or otherwise use any of the information or documents obtained from the City Dropbox folders", as well as a mandatory preservation order of documents and data "until such time as they may be examined as part of the litigation and the Court determines whether they should be permanently destroyed under Court-appointed supervision." (Ex. K pp. 5-6.)

While the party challenging the superior court's temporary restraining order has the burden showing of an abuse of discretion (*Biosense Webster, Inc. v. Superior Court* (2006) 135 Cal.App.4th 827, 834), the restrained party need only show that the superior court abused its discretion as to one of the two factors. (*Teachers Ins. & Annuity Assn. v. Furlotti* (1999) 70 Cal.App.4th 1487, 1493.) But here, the Trial Court abused its discretion as to both factors. The balance of harms weighs squarely against the prior

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demonstrating that the record in question is exempt under express provisions of this chapter or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record"]; *see also San Gabriel Tribune v. Sup. Ct.* (1983) 143 Cal. App.3d 762, 773 ["the burden of showing that nondisclosure is justified is on the agency seeking to withhold the requested record..."]; *CBS Broadcasting, Inc. v. Sup. Ct.* (2001) 91 Cal.App.4th 892, 908 ["the burden of proof is on the proponent of nondisclosure..."].)

restraint issued by the Court and there is no chance that the City can prevail because this is a classic SLAPP - the conduct that the City seeks to restrain and penalize is protected newsgathering.

A request for a prior restraint comes "with a heavy presumption against its constitutional validity." (*Organization for a Better Austin v. Keefe* (1971) 402 U.S. 415, 419; *see also Freedom Communications,* 167 Cal.App.4th at 154 [holding prior restraint is a "most extraordinary remedy that may be used only in exceptional cases"].) A court may not issue even a temporary prior restraint unless the restriction is necessary "to further a state interest of the highest order," (*Smith*, 443 U.S. at 102), and the publication "threaten[s] an interest more fundamental than the First Amendment itself." (*Procter & Gamble,* 78 F.3d at 227.)

Notwithstanding this established caselaw, the Trial Court found that the City's claims of confidentiality and of attorney/client privilege outweighed Defendants' First Amendment protections – a clear abuse of discretion. (Ex. L., pp. 6, 25.) (*Hurvitz,* 84 Cal.App.4th at 1243 [""[r]espondent can point to no case where any court in the nation has held that a threatened violation of the patient/physician privilege or ***any other privilege*** justifies a prior restraint of speech"].)

In attempting to justify the restraint, the Court noted it was concerned about how the documents were obtained (Ex. L., pp. 27-28, 30), improperly punishing Defendants for invoking First Amendment and Shield Law protections (Cal. Const., Art. I, § 2; Evid. Code § 1070), not revealing its source for published reports

about the documents, and for refusing to confirm what it would publish in the future. (Ex. L., pp. 11, 20-21.)

The trial court made no finding that the City was likely to prevail on the merits, nor could it. The City's lawsuit is a SLAPP, filed against the small publisher in retaliation for it publishing information unflattering to the City and for it suing the City for violating the CPRA. The City's lawsuit arises out of protected activity - filing a CPRA request, newsgathering, reporting on issues of public interest, the exercise of its right to Petition in filing the CPRA lawsuit—conduct protected by Section 425.16(e).

The City claims that criminal conduct is exempt from the SLAPP statute, but as the trial court noted (Ex. L., p. 24), exempt criminal conduct must be "admitted or undisputed" to defeat an anti-SLAPP motion which is certainly not the case here. (*See* e.g., *Flatley v. Mauro* (2006) 39 Cal.4th 299, 320 [holding that in the "narrow circumstance" where either the defendant concedes the illegality of its conduct or the illegality is conclusively shown by the evidence, the motion must be denied" but that if "a factual dispute exists about the legitimacy of the defendant's conduct, it cannot be resolved within the first step"]; *City of Montebello v. Vasquez* (2016) 1 Cal.5th 409, 424 ["conduct must be illegal *as a matter of law* to defeat a defendant's showing of protected activity"].)

Further, the underlying acts the City complains about are not criminal. The City uses an impermissibly overbroad interpretation of the Federal Computer Fraud and Abuse Act (18 U.S.C. § 1030, *et seq*.) and its California counterpart, the Comprehensive Computer Data Access and Fraud Act (Pen. Code § 502 *et seq*.), to allege that

the Blog "exceeded authorized access" to the City's Dropbox account. But "where access is open to the general public, the CFAA 'without authorization' concept is inapplicable." *hiQ Labs, Inc. v. LinkedIn Corporation* (9th Cir. 2019) 938 F.3d 985, 1000. Here, the City's frequent publication of its Dropbox link and the lack of any password protection is fatal to its claim.

Therefore, Defendants respectfully asks this Court to grant this writ, immediately dissolve the temporary restraining order, and stay the trial court proceedings pending this Court's ruling on this matter.

PETITION FOR EXTRAORDINARY WRIT OF MANDATE, PROHIBITION, AND/OR OTHER APPROPRIATE RELIEF

I. Jurisdiction and Timeliness of Petition.

1. This petition arises out of a temporary restraining order issued by Judge Thomas A. Delaney of the Orange County Superior Court, Case No. 30-2019-01107063-CU-NP-CJC, entitled *City of Fullerton v. Friends for Fullerton's Future, et al.,* issuing a prior restraint against the Defendant's from publishing documents the City claims are confidential.

2. On October 24, 2019, the City filed its lawsuit and filed an *ex parte* application for a temporary restraining order, which was heard on October 25, 2019.

3. On October 25, 2019, the Trial Court, issued a temporary restraining order, in part, issuing a mandatory preservation order of documents and data "until such time as they may be examined as part of the litigation and the Court determines whether they should be permanently destroyed under Court-appointed supervision," "[s]elling, publishing, distributing,

disclosing or otherwise using any of the information or documents obtained from the City Dropbox folders," or "[c]onspiring with third parties to sell, publish, distribute, disclose or otherwise use any of the information or documents obtained from the City Drop box folders." (Ex. K pp. 5-6.)

4. There is no statutory time limit for filing this writ petition, and this writ is being filed well within the 60-day filing period applicable to appeals. (*Labor & Workforce Dev. Agency v Superior Court* (2018) 19 Cal.App.5th 12, 24; *Cal W. Nurseries, Inc. v Superior Court* (2005) 129 Cal.App.4th 1170, 1173.)

II. <u>Absence of Other Remedies</u>.

5. Petitioner has no plain, speedy, and adequate remedy, other than the relief sought in this Petition.

6. While the issuance of a temporary restraining order is an appealable order, here an appeal is not a speedy or adequate remedy.

7. As this Court explained in issuing a peremptory writ dissolving another prior restraint against a newspaper, "[e]very moment's continuance of [such an order] amounts to a flagrant, indefensible, and continuing violation of the First Amendment." (*Freedom Communications,* 167 Cal.App.4th at 153.)

III. <u>Evidence and Authenticity of Exhibits</u>.

8. The exhibits accompanying this Petition are true and correct copies of the original documents they purport to be. All exhibits are incorporated herein by reference as if fully set forth in this Petition.

9. A copy of the temporary restraining order is attached to the Notice of Ruling on the City's *Ex Parte* Application, and is included as Exhibit K.

10. A true and correct copy of the reporter's transcript of the hearing on the City's Ex Parte Application held on October 25, 2018, is included as Exhibit L.

IV. Parties and Beneficial Interest of Petitioners.

11. Petitioners Friends for Fullerton's Future, Joshua Ferguson, and David Curlee were the Defendants in the action before the Superior Court.

12. The City also sued Christopher Tennyson, someone who has no connection to the Blog.

13. As of the date of this Petition, Defendants are informed and believe and on that basis allege that none of the defendants have been served with the Complaint or the Temporary Restraining Order.

14. Respondent Superior Court of California, County of Orange, is a duly-qualified superior court exercising its judicial powers in connection with the proceeding below.

15. Real Party in Interest City of Fullerton is the Plaintiff in the Trial Court. The County is a "local agency" as defined by Government Code, section 6252(a), and is, therefore, subject to the California Public Records Act.

V. Statement of Facts.

16. Defendant Friends for Fullerton's Future maintains a website, https://www.fullertonsfuture.org/, (the "Blog"), which is dedicated to covering news, politics, police activity, and government affairs in the City of Fullerton. The Blog has many contributors, including Defendants Joshua Ferguson and David Curlee.

17. Over the past few years, Mr. Ferguson and Mr. Curlee submitted a number of CPRA requests to the City seeking information in the course of their reporting for the Blog. (Klein

Decl., ¶ 13.) To disclose documents responsive to various CPRA Requests, including those made by Defendants, the City places the public records in Dropbox, a file hosting platform that allows users to store and share files. (Klein Decl., ¶ 7.)

18. The City sent links to its Dropbox account to Mr. Ferguson, Mr. Curlee, and other members of the public. The City's main Dropbox account was located at www.CityOfFullerton.com/outbox. While the City sometimes provided links to specific folders within Dropbox account, it also provided the link to its main Dropbox account. (Klein Decl., ¶ 11; Exs. A-E.) In fact, Petitioners are informed and believe, and on that basis allege, that the City frequently gave out the link to its general Dropbox account indiscriminately to numerous members of the public, including to the Blog, on multiple occasions.[3] (Klein Decl., ¶ 11; Ex. E.)

19. Defendants are informed and believe, and on that basis allege, that the City's Dropbox account, www.CityOfFullerton.com/outbox, and any folders therein, contained no password protection.

20. Occasionally, the City's Dropbox account contained .zip files (a form of compression allowing large files to be compressed, sent via email or otherwise transferred over the internet, and then "unzipped"/decompressed for viewing by the recipient). Petitioner is informed and believes, and on that basis alleges, that on numerous occasions, the City disclosed to members of the public that generic passwords, such as Fullerton! Or Full3rtOn!, could be used to unzip

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[3] While the link to the City's Dropbox account is no longer "live" and was presumably deactivated prior to this lawsuit, clicking on the link still directs to a Dropbox-based website.(https://www.dropbox.com/sh/sozl29ka9ruft5f/AAAlF09tTMU0AksBvdrwOJlsa?dl=0). The City's factual claims only relate to access of its Dropbox account, ***not*** to the City's computer network.

any files, but that no password was required to access or download any of the files. (See e.g., Klein Decl., ¶¶ 11; Exs. A, E.)

21. The City now claims that the Dropbox account contained thousands of documents that the City did not intend to release for public disclosure. The City alleges that Defendants accessed and downloaded records contained on the City's Dropbox account, www.CityofFullerton.com/outbox and points to a handful of Blog posts reporting on records that the City claims were in its Dropbox account. (Strebe Decl., ¶¶ 76-80, 84.) The City alleges that the Defendants should have known that the documents the City placed in the Dropbox account were not intended for public disclosure despite the fact that the City's account folders used Defendant's names, initials, or email address as part of the folder's name. (Klein Decl., ¶ ¶ 16, 17.)

22. On or about June 13, 2019, at 8:45 p.m, Gregory Palmer, the contract City Prosecutor (who is employed by Jones & Mayer, the firm that also acts as the contract City Attorney for the City and represents the City in this action), sent a cease and desist letter to Joshua Ferguson on behalf of the City of Fullerton and/or its police department. (Lindsay Decl., Ex. A.) The letter complained that the Blog had published "confidential" documents and demanded that the Blog remove the confidential documents from the website, refrain from posting any other confidential documents "illegally" obtained by the Blog, return all the confidential documents to the City, and delete any electronic copies of confidential documents in the Blog's possession.

23. On or about July 11, 2019, the City of Fullerton sent correspondence to Kelly Aviles, attorney for the Blog. (Lindsay Decl., Ex. C.) The letter claimed that the Blog was in unlawful

possession of records obtained from the City's "Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson or any of [the Blog's] agents or associates through an emailed link, including but not limited to records contained in a folder named "pr1919 – Josh Ferguson." (*Id.*) The letter also claimed that many confidential documents were posted on the Blog.

24. On July 31, 2019, Ms. Aviles responded to the City, denying the City's allegations and advising the City of the Blog's Shield Law and First Amendment protections. (Lindsay Decl., Ex. D.)

25. The City made no attempt to respond or contact the Defendants or Ms. Aviles after July 31, 2019.

26. On or about October 10, 2019, Mr. Ferguson, filed a lawsuit against the City for its failure to comply with the CPRA, including improperly withholding numerous records related to police and employee misconduct. (Orange County Superior Court, Case No. 30-2019-01103679-CU-WM-CJC.) The lawsuit was served on October 17, 2019.

27. In retaliation for Mr. Ferguson's CPRA lawsuit and to silence the Blog, on October 24, 2019, the City filed this lawsuit, claiming the Defendants stole City documents and hacked the City's servers, using an impermissibly overbroad interpretation that accessing the City's Dropbox account constituted a violation of the Federal Computer Fraud and Abuse Act and its California counterpart, the Comprehensive Computer Data Access and Fraud Act.

28. Despite the failure to comply with California Rules of Court, Rule 3.1203, at approximately 11:30 p.m. on October 24,

2019, the City gave approximately two hours' notice to Kelly Aviles of an *ex parte* application for a temporary restraining order which it claimed was to be heard at 1:30 p.m. However, when Ms. Aviles arrived at the Orange County Courthouse, the matter had not been scheduled and the Trial Court informed the parties that it would be unable to hear the *ex parte* until October 25, 2019 at 1:30 p.m, which still did not comply with the notice requirements of Rule 3.1203.

29. Defendants filed their Opposition to the *Ex Parte* Application (Ex. J.) on October 25 and Ms. Aviles appeared for the hearing.

30. Following argument, on October 25, 2019, the Honorable Thomas A. Delaney, presiding in Respondent Court issued a temporary restraining order prohibiting the "[s]elling, publishing, distributing, disclosing or otherwise using any of the information or documents obtained from the City Dropbox folders" and "[c]onspiring with third parties to sell, publish, distribute, disclose or otherwise use any of the information or documents obtained from the City Dropbox folders", as well as a mandatory preservation order of documents and data "until such time as they may be examined as part of the litigation and the Court determines whether they should be permanently destroyed under Court-appointed supervision." (Ex. K pp. 5-6.)

31. The Court also issued an Order to Show Cause as to why a preliminary injunction should not issue, which is set for November 21, 2019, at 9:00 a.m.

VI. <u>Standard of Review & Burden of Proof</u>.

32. On appeal, the party challenging the superior court's temporary restraining order has the burden showing of an abuse of discretion. (*Biosense,* 135 Cal.App.4th at 834.) The restrained party

need only show that the superior court abused its discretion as to one of the two factors. (*Teachers Ins. & Annuity Assn. v. Furlotti,* 70 Cal.App.4th at 1493.)

33. Where the grant or denial of a preliminary injunction is dependent upon the interpretation and application of a statute or constitutional law and the matter is purely a question of law, appellate courts conduct a broader review. (*Jamison v. Department of Transp.* (2016) 4 Cal.App.5th 356, 362; *Garamendi v. Executive Life Ins. Co.* (1993) 17 Cal.App.4th 504, 512.)

34. "[W]here a Federal right has been denied as the result of a factual finding ... or where a conclusion of law as to a Federal right and a finding of fact are so intermingled as to make it necessary, in order to pass upon the Federal question, to analyze the facts ... [t]he reviewing court must independently review the record to determine whether it supports the requisite factual findings with convincing clarity." (*DVD Copy Control Ass'n Inc. v. Bunner* (2004) 116 Cal.App.4th 241, 250 (internal quotes, citations and brackets omitted).)

35. Even where the question of law is not entirely determinative of the likelihood of plaintiff's success on the merits, "it may be appropriate for the appellate court to express its opinion in order to clarify or narrow the issues for trial." (*Carsten v. City of Del Mar* (1992) 8 Cal.App.4th 1642, 1650.)

36. When a restraining order is alleged to infringe on constitutional rights of expression, the facts and statements germane to the First Amendment challenge are reviewed de novo. Whether an injunction passes constitutional muster is a question of law considered de novo. (*Parisi v. Mazzaferro* (2016) 5 Cal.App.5th 1219, 1226-1227.)

VII. Prayer for Relief.

WHEREFORE, Petitioners Friends For Fullerton's Future, Joshua Ferguson, and David Curlee request that this Court grant relief as follows:

1. Issue an immediate, emergency stay of the temporary restraining order;

2. Issue an alternative and peremptory writ of mandamus, or other appropriate relief, directing Respondent Superior Court of California, County of Orange to:

   a. dissolve the temporary restraining order;

   b. desist or refrain from further proceedings in the action or matter specified therein, until further order of this Court, and;

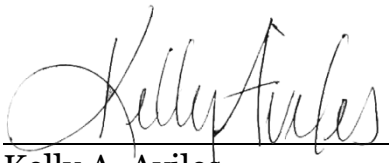
   c. to show cause before this Court as to why it should not enter an order against the City and in favor of Defendants in this matter.

3. Grant Petitioner its reasonable attorneys' fees and costs of suit pursuant to Code of Civil Procedure section 1021.5, and/or Rule 8.278 of the California Rules of Court; and,

4. Order other such relief as may be just and proper.

DATED: October 30, 2019

LAW OFFICES OF KELLY A. AVILES



Kelly A. Aviles
Attorney for Petitioners
FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, AND DAVID CURLEE

VERIFICATION

I, Joshua Ferguson, am a Defendant in the above-entitled action or proceeding. I have read the foregoing **PETITION FOR EXTRAORDINARY WRIT** and know the contents thereof, and I certify that the same is true and correct of my own knowledge, except as to those matters which are therein stated upon my information and belief, and as to those matters I believe them to be true.

This Verification was executed on October 30, 2019, at Fullerton, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Joshua Ferguson

VERIFICATION

I, David Curlee, am a Defendant in the above-entitled action or proceeding. I have read the foregoing **PETITION FOR EXTRAORDINARY WRIT** and know the contents thereof, and I certify that the same is true and correct of my own knowledge, except as to those matters which are therein stated upon my information and belief, and as to those matters I believe them to be true.

This Verification was executed on October 30, 2019, at Fullerton, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

David Curlee

MEMORANDUM OF POINTS AND AUTHORITIES

A. The Temporary Restraining Order is an Unconstitutional Prior Restraint.

As the United States Supreme Court repeatedly has recognized, prior restraints constitute "the most serious and the least tolerable infringement on First Amendment rights." (*Nebraska Press Ass'n v. Stuart* (1976) 427 U.S. 539, 559.) At its core, the prior-restraint doctrine expresses a constitutional aversion to government censorship of the press. The Supreme Court has explained that prior restraints against speech must be held to a stricter standard than even post-publication criminal penalties because:

> a free society prefers to punish the few who abuse rights of speech after they break the law than to throttle them and all others beforehand. It is always difficult to know in advance what an individual will say, and the line between legitimate and illegitimate speech is often so finely drawn that the risks of freewheeling censorship are formidable.

(Southeastern Promotions v. Conrad (1975) 420 U.S. 546, 559.)

When the government, including the judiciary, censors the press, it harms the "main purpose" of the First Amendment, which is "to prevent all such previous restraints upon publications as [have] been practiced by other governments." (*Nebraska Press,* 427 U.S. at 557.) It is widely agreed that "[t]here is, indeed, something peculiarly totalitarian about government systems of prior restraint." (R. Smolla, Smolla & Nimmer on Freedom of Speech § 15:10 (2004).) The Supreme Court has "learned...from what we view as the unhappy experiences of other nations where government has been allowed to meddle in the internal editorial affairs of newspapers." (*Nebraska Press,* 427 U.S. at 560.) This core principle

is critical here; "the history and language of the First Amendment support the view that the press must be left free to publish news, whatever the source, without censorship, injunctions, or prior restraints." (*New York Times,* 403 U.S. at 717 (Black, J., concurring).)

The Court has declared that prior restraints may be justified, if at all, only in the most exceptional circumstances, such as to limit dissemination of information about troop movements in wartime, (*Near v. Minnesota* (1931) 283 U.S. 697, 716), or to "suppress[ ] information that would set in motion a nuclear holocaust." (*New York Times,* 403 U.S. at 726 (Brennan, J., concurring).) Similarly, in granting an emergency stay of a prior restraint against a news organization, Justice Blackmun declared that such orders are a "most extraordinary remedy" that may be used "only where the evil that would result from the reportage is both great and certain and cannot be militated by less intrusive measures." (*CBS v. Davis* (1994) 510 U.S. 1315, 1317 (1994) (Blackmun, J., in chambers).) Absent a "clear and present danger," (*Nebraska Press*, 427 U.S. at 563) to a "state interest of the highest order," (*Smith v. Daily Mail Publishing Co*. (1979) 443 U.S. 97, 102), such restraints cannot be upheld.

To date, those circumstances have remained purely hypothetical[4]; the Supreme Court without exception has

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[4] Courts have yet to identify an interest that would satisfy the "state interest of the highest order" standard. As one commentator has explained, "*Florida Star* itself raised the presumptive level [of this standard] beyond realistic reach." (J. Mintz, The Remains of Privacy's Disclosure Tort, 55 Md. L. Rev. 425, 455 (1996).)

invalidated prior restraints, even where substantial interests would be impaired by the publication sought to be enjoined. (*Procter & Gamble Co. v. Bankers Trust Co.* (6th Cir. 1996) 78 F.3d 219, 227 [Supreme Court "has never upheld a prior restraint, even faced with the competing interest of national security or the Sixth Amendment right to a fair trial"]*; accord South Coast Newspapers, Inc. v. Superior Court* (2000) 85 Cal. App. 4th 866, 870 [court observed that it was "unaware of any case, in either federal or state court, that has upheld a prior restraint under the *Nebraska Press* criteria"]. *See also Near*, 283 U.S. at 716-718 [invalidating prior restraint against defamatory and racist publication that allegedly disturbed the "public peace"]; *Nebraska Press*, 427 U.S. at 556-561 [invalidating prior restraint against publication of information about criminal defendant's confession, despite alleged risk to Sixth Amendment rights]; *New York Times*, 403 U.S. at 714 [invalidating prior restraint against publication of the "Pentagon Papers," despite the government's argument that disclosure of that information posed a "grave and immediate danger" to national security].)

California's state constitutional guarantee of free speech and free press is “more protective, definitive and inclusive of rights to expression of speech than their federal counterparts.” (*San Diego Unified Port Dist. v. U.S. Citizens Patrol* (1998) 63 Cal.App.4th 964, 970, (internal quotes omitted). As a consequence, the burden on a party seeking a prior restraint in this state is even more onerous and may be insurmountable.

More than a century ago, the California Supreme Court explained the breadth of the state's protection of speech and press rights:

> The wording of [Article I, section 2(a)] is terse and vigorous, and its meaning so plain that construction is not needed. The right of the citizen to freely ... publish his sentiments is unlimited[.] ... He shall have no censor over him...,but he shall be held accountable to the law for...what he publishes.

(Dailey v. Superior Court (1896) 112 Cal.94, 97.)

Not surprisingly, California courts have also uniformly struck down prior restrains, which the California Supreme Court has denounced as "the most severe method of intellectual suppression known in moden times." (*Flack v. Municipal Court* (1967) 66 Cal.2d 981, 988 n.5. *See, e.g., KCST-TV Channel 39 v. Municipal Court* (1988) 201 Cal.App.3d 143, 144-145 [refusing to restrain publication of information that was lawfully obtained, noting that "long-standing Supreme Court precedent establishes the court's prohibitory order is an unconstitutional prior restraint violating the First Amendment"]; *KGTV Channel 10 v. Superior Court* (1994) 26 Cal.App.4th 1673, 1677 [striking down order barring press from publishing photographs of criminal defendants as an unconstitutional prior restraint]; *Freedom Communications,* 167 Cal.App.4th at 151 [finding that order preventing a news organization from publishing lawfully obtained information was "unconstitutional under both the United States and California Constitutions," and, consequently, "must immediately fall"].)

Most recently, the court of appeal granted an anti-SLAPP motion after a union tried to clawback and stop the publication

documents about police officers, which the union claimed were confidential and could not be released under various protective statutes. (*ALADS,* 239 Cal.App.4th at 820.) The court summed up its decision affirming the trial court's grating of the anti-SLAPP motion:

> [The union] has cited no case permitting the kind of injunction it seeks here, to restrain a newspaper from publishing news articles on a matter of public concern....because there is no such case. For more than 100 years, federal and state courts have refused to allow the subjects of potential news reports to stop journalists from publishing reports about them. (*Providence Journal, supra*, 820 F.2d at pp. 1348–1349 ["In its nearly two centuries of existence, the Supreme Court has never upheld a prior restraint on pure speech"; the Supreme Court has never upheld a prior restraint on the publication of news.])

(Id., at 824.) The Trial Court's order here, restricting the disclosure of information by the Blog, is no different. It is a prior restraint that the is presumptively unconstitutional and must be rejected.

B. <u>Prior Restraints Are Presumptively Unconstitutional</u>.

While the party challenging the superior court's temporary restraining order has the burden showing of an abuse of discretion, (*Biosense,* 135 Cal.App.4th at 834), a prior restraint comes "with a heavy presumption against its constitutional validity." (*Organization for a Better Austin v. Keefe* (1971) 402 U.S. 415, 419; *see also Freedom Communications,* 167 Cal. App. 4th at 154 [holding prior restraint is a "most extraordinary remedy that may be used only in exceptional cases"].) A court may not issue even a temporary prior restraint unless the restriction is necessary "to further a state interest of the highest order," (*Smith*, 443 U.S. at 102), and the publication

"threaten[s] an interest more fundamental than the First Amendment itself." (*Procter & Gamble,* 78 F.3d at 227.)

This is an extremely strict standard. The court must find evidence of a "clear and present danger" of harm to a paramount state interest; "speculati[on]" or "factors unknown and unknowable" never will justify a prior restraint. (*Nebraska Press,* 427 U.S. at 563.) Thus, for example, "[i]t is not enough for a court to decide that [some right] may be affected by the exercise of free speech." (*Hurvitz*, 84 Cal. App. 4th at 1241.) Instead, the proponent of the restraint bears "the burden of producing evidence to establish the prejudice." (*Ibid.*)

Here, this exacting standard was not close to met in this case for a variety of reasons.

C. <u>The Conduct The City's Complaint Is Based on Is Not Criminal</u>.

After being warned that attempting to restrain a news organization from publishing information it lawfully obtained would constitute a prior restraint and a SLAPP (Lindsay Decl., Ex. D), the City decided to allege that the Blog's conduct was unlawful in a blatant attempt to try to avoid the application of the long line of cases that preclude the City's requested relief in this action. Yet, the conduct the City complains of is not criminal. Recent case law demonstrates that the City's theory that accessing its publicly available Dropbox and files inadvertently made available to the public is "hacking" or "stealing" cannot stand scrutiny.

The Computer Fraud and Abuse Act ("CFAA")[5] has been the subject of much scrutiny, specifically for the concerns it raises for

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[5] The City also alleges a violation of the state equivalent, the Comprehensive Computer Data Access and Fraud Act, which

journalists.[6] Section 1030(a)(2)(c) of the CFAA prohibits the "intentional [] accesses [of[a computer without authorization or exceeds authorized access" to obtain "information from any protected computer" (defined as one "used in or affecting interstate or foreign commerce or communication.") The legislative history is clear that the CFAA was designed to criminalize "hacking——the circumvention of technological access barriers…." *U.S. v. Nosal* (9th Cir. 2012) 676 F.3d 854, 863 ("*Nosal I*"). But here, accessing the City's publicly-accessible Dropbox account that it failed to secure by even the most basic protections – such as a password – could never be considered "hacking" under the CFAA.

This was confirmed in *hiQ Labs,* 938 F.3d at 1000, where the court held that "where access is open to the general public, the CFAA 'without authorization' concept is inapplicable." Similarly, in

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ultimately suffers from the same problems. Thus, they are analyzed here together.

[6] See Electronic Frontier Foundation, *Prominent Security Researchers, Academics, and Lawyers Demand Congress Reform the CFAA and Support Aaron's Law* (Aug. 2, 2013), available at https://www.eff.org/deeplinks/2013/08/letter; Electronic Frontier Foundation, *Accessing Publicly Available Information on the Internet Is Not a Crime* (Dec. 11, 2017), available at https://www.eff.org/deeplinks/2017/12/eff-court-accessing-publicly-available-information-internet-not-crime; Wired, *Hacker Lexicon: What is the Computer Fraud and Abuse Act* (Nov. 11, 2014) available at https://www.wired.com/2014/11/hacker-lexicon-computer-fraud-abuse-act/; ACLU; *Data Journalism and the Computer Fraud and Abuse Act: Tips for Moving Forward in an Uncertain Landscape,* available at https://www.aclu.org/sites/default/files/field_document/data_journalism_and_the_computer_fraud_and_abuse_act-_tips_for_moving_forward_in_an_uncertain_landscape.pdf.

In *LVRC Holdings LLC v. Brekka* (9th Cir. 2009) 581 F.3d 1127, 1135, the Court held that "without authorization" under the CFAA "when the person has not received permission to use the computer for any purpose (such as when a hacker accesses someone's computer without any permission), or when the employer has rescinded permission to access the computer and the defendant uses the computer anyway." Without some barrier to entry, however, everyone is "authorized" to access data. (*See, e.g., Pulte Homes, Inc. v. Laborer's Int'l Union of N. Am.* (6th Cir. 2011) 648 F.3d 295, 304 [public presumptively authorized to access "unprotected website"]; *Craigslist, Inc. v. 3Taps, Inc.* (N.D. Cal. 2013) 964 F.Supp.2d 1178, 1182 (Craigslist II") [making information publicly available on website gives everyone "authorization" to view it under the CFAA].)

This is fatal to the City's claims here. Since the City provided public access to its Dropbox outbox, regardless of whether the information located within the account was uploaded by the City unintentionally or even negligently, the CFAA cannot be violated. (*See* Klein Decl. ¶ 11 ["[t]here were a few instances where the City inadvertently sent PRA requesters a link to the City's entire Dropbox account"]; Ex. E [giving Defendant Curlee access to the City's entire Dropbox account[7]].) This is confirmed by the City's declaration. "The only way to initiate access [to its Dropbox] is to obtain a link from someone who has authorized access. Once a user has initiated access to a Dropbox folder, various access control rights may be configured to control what files are exposed to anonymous users."

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[7] While the City claims that it did not send Mr. Ferguson or the Blog a link to the www.CityofFullerton.com/outbox, the City acknowledges that it knew Mr. Curlee was working with the Blog when making his requests. (Klein Decl., ¶ 13.)

(Strebe Decl., ¶ 22.) Thus, under the City's own reasoning, if Defendants did obtain documents from the City's Dropbox account, a claim that the evidence does not demonstrate, it could have only been by being sent a link from someone who had authorized access or because the folders themselves were not configured in a way to limit access.

While the City claims that it did not give express permission to access each and every file its entire Dropbox account, it certainly did nothing to restrict access. Thus, the conduct that the City complains of is no more criminal than clicking through the City's website, finding confidential information, and downloading it, regardless of whether the City sent links to each page or file.

Thus, under the current case law, the only way that the City could now bring a claim under the CFAA is for it to have "revoked access" *Facebook, Inc. v. Power Ventures, Inc.* (9th Cir. 2016) 844 F.3d 1058, 1067 ["a defendant can run afoul of the CFAA when he or she has no permission to access a computer or when such permission has been revoked explicitly."] But here, the first time that the City ever "revoked" access to its Dropbox account was in its July 11, 2019 correspondence. The City's lawsuit makes no claims that there was any access after that date.

Even more fatal to the City's claims is that the documents that were in its Dropbox account, which are now subject to the TRO, were public records, relating to the conduct of the public's business, and are therefore presumptively public and disclosable under the CPRA (*Sander v. State Bar*, 58 Cal.4th at 323 [CPRA "establishes a presumptive right of access to any record created or maintained by a public agency that relates in any way to the business of the public agency..."].) The idea that anyone should have known that

documents that were not password protected, presumptively disclosable, and housed on the City's Dropbox account that the City frequently disclosed to the public and used to disseminate public information in response to CPRA requests, were not disclosable is ludicrous and cannot make for the basis of any criminal charges, lest all the public be criminalized.

D. A Prior Restraint Is Not Justified Even Where Information Is Confidential Or Obtained Illegally By A Third Party And Disclosed To The Press.

Despite the City's claims, there is a long line of cases from the Supreme Court which have held that the constitutional presumption against prior restraints applies regardless of whether the information is confidential or obtained illegally. In the landmark *New York Times* case, the Supreme Court rejected a prior restraint to prevent the newspaper's publication of the Pentagon Papers, even though the Court acknowledged that it was a "classified study" the disclosure of which was not authorized. (403 U.S. at 714; *see also Bridges v. California* (1941) 314 U.S. 252, 265–66, 271 [Supreme Court reversing contempt for publishing source's telegrams commenting on public court proceedings, finding that the First Amendment's protections for freedom of the press "were intended to give to liberty of the press, as to the other liberties, the broadest scope that could be countenanced in an orderly society"]; *Miami Herald Publ'g Co. v. Tornillo* (1971) 418 U.S. 241, 258 (1971) ["The choice of material to go into a newspaper...and treatment of public issues and public officials—whether fair or unfair—constitute the exercise of editorial control and judgment. It has yet to be demonstrated how governmental regulation of this crucial process can be exercised consistent with First Amendment guarantees of a free press as they

have evolved to this time"]; *Cox Broadcasting Corp. v. Cohn* (1975) 420 U.S. 469 [1st Amend. protected reporter who published rape victim's name in violation of state criminal statute]; *Oklahoma Publishing Co. v. District Court* (1977) 430 U.S. 308 [reversing injunction which prevented the reporting of the name or likeness of a juvenile criminal defendant, in spite of a state law that required juvenile proceedings to be held in private]; *Landmark Communications v. Va.* (1978) 435 U.S. 829, at 831-32 [invalidating newspaper's punishment for publishing information from confidential judicial disciplinary proceedings]; *Smith v. Daily Mail Publishing,* 443 U.S. 97 [invalidating state law that criminalized publication of juvenile murder suspect's name without court permission]; *Florida Star,* 491 U.S. at 524 [1st Amend. protected newspaper that published rape victim's, which violated state criminal statute]; *Bartnicki v. Vopper* (2001) 532 U.S. 514, 517, 535 [1st Amendment protected journalists who reported contents of illegally intercepted telephone conversations even though they knew "or at least had reason to know" the interceptions were unlawful because bargaining negotiations between school board and union were matters of public concern].)

Relying on this unbroken line of United States Supreme Court authorities and the broader state constitutional guarantee of free speech,[8] California courts have also held that the constitutional presumption against prior restraints applies regardless of whether the information is confidential or obtained illegally. In *Nicholson v.*

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[8] *See, e.g., Gilbert v. National Enquirer, Inc.* (1996) 43 Cal.App.4th 1135, 1144, "the California Constitution provides an even broader guarantee of the right of free speech and the press than does the First Amendment."]

McClatchy Newspapers (1986) 177 Cal.App.3d 509, 521, the plaintiff alleged that the newspapers' reporting of the fact that the State Bar had found him unqualified for appointment to the bench, which was required to be kept confidential under the Government Code, violated his right of privacy. (*Ibid.*) In ruling for the newspapers, the court of appeal recognized both the plaintiff's expectation of confidentiality and that someone undoubtedly "acted in violation of this law in disclosing the evaluation to the media defendants." (*Id.* at 516.) But, the court said, "the First Amendment protects the ordinary news-gathering techniques of reporters and ***those techniques cannot be stripped of their constitutional shield by calling them tortious***." (*Id.* at 513, (emphasis added); *see also Gilbert v. National Enquirer, Inc.*, 43 Cal.App.4th at 1148 [prior restraint was not permitted to prevent publication of defamatory statements or disclosure of matters protected by the right of privacy, even though such publication and disclosure might be actionable in tort. "While the government may desire to keep some proceedings confidential and may impose the duty upon participants to maintain confidentiality, it may not impose criminal or civil liability upon the press for obtaining and publishing newsworthy information through routine reporting techniques." (*Id.* at 519–520.)

Most recently, in *ALADS,* 239 Cal.App.4th at 826-827, the court of appeal upheld a trial court ruling which granted an anti-SLAPP motion. The Los Angeles Times received information about the qualifications of police officers, including information about past instances of misconduct, records which arguably may be withheld from public disclosure pursuant to certain statutes. (*Ibid.*) The union claimed that the Los Angeles Times had obtained the records "through criminal means." But the court found that the union "ha[d]

not distinguished, and cannot distinguish, the 'wealth of both State and Federal case law, discussing the protection journalists and the press enjoy under the First Amendment where there have been allegations that published or disclosed content had been illegally obtained.'" (*Id.* at 819.)

In *Florida Star*, the Supreme Court explained that it is the responsibility of the government to deal with the fallout from its failure to protect confidential information:

> Where, as here, the government has failed to police itself in disseminating information, it is clear under *Cox Broadcasting*, *Oklahoma Publishing*, and *Landmark Communications* that the imposition of damages against the press for its subsequent publication can hardly be said to be a narrowly tailored means of safeguarding anonymity. Once the government has placed such information in the public domain, "reliance must rest upon the judgment of those who decide what to publish or broadcast."

(*Id.* at 538 (citations omitted); *see also Ashcraft v. Conoco* (2000) 218 F.3d 288, 303 ["No citizen is responsible, upon pain of criminal and civil sanction, for ensuring that the internal procedures designed to protect the legitimate confidences of government are respected"].)

As Justice Stewart once explained, the "government cannot take it upon itself to decide what a newspaper may and may not publish," and that although "government may deny access to information and punish its theft, government may not prohibit or punish the publication of that information once it falls into the hands of the press, unless the need for secrecy is manifestly overwhelming." (*Landmark Communications*, 435 U.S. at 849 (Stewart, J., concurring).)

As these cases demonstrate, whether information is released by mistake, obtained in violation of criminal or civil statutes, or even stolen by a third party, courts have consistently held that both pre-publication restraints and post-publication sanctions violate the First Amendment, absent exceptional circumstances. Here, the Blog did nothing improper, much less illegal, to obtain the information at issue here and its publication of that information cannot be lawfully restrained.[9]

The City argues that these First Amendment protections do not apply to criminal conduct. While no one argues that the press has some special immunity from criminal conduct, merely alleging, in civil court, that information was obtained in a criminal manner, is severely insufficient to justify a prior restraint. And any attempt to criminalize routine newsgathering, such as going to a public agency's website, would run afoul of the First Amendment. (*See* e.g. *ALADS,* 239 Cal.App.4th at 826-827 [court held that injunction was a prior restraint even where union claimed reporter stole confidential investigation files or received stolen property]; *Nicholson v. McClatchy Newspapers,* 177 Cal.App.3d 509, 521 [rejecting allegations of that newspapers criminally conspired to unlawfully

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[9] Contrary to the City's argument, the Blog has no burden to demonstrate how it got access to any information it published. That information is protected by the Shield Law. (Cal. Const., Art. I, § 2.) Any inference that the invocation of one's Constitutional rights is akin to suggesting that there should be a negative inference from a criminal defendant's decision not to testify, which is clearly erroneous. Moreover, that burden of proof in this case and the burden to meet the high showing necessary for any TRO, sits squarely on the shoulders of the City.

obtain confidential information]; *New York Times*, 403 U.S. at 730-731, 733 (conc. opn. of White, J.) [noting that even if conduct may be punished criminally, publication may not be restrained despite the damage it would do to national security "because of the concededly extraordinary protection against prior restraints enjoyed by the press under our constitutional system"].)

Yet another insurmountable hurdle to the City's request – the City can provide no admissible evidence of what the Blog or its reporters actually have in their possession. Instead, the City asks this Court to enjoin the Blog from publishing any records it *might* have in its possession. But the *mere possibility* that a party's interest *could* be impacted could never be sufficient to satisfy the strict constitutional requirements for a prior restraint. (*Nebraska Press*, 427 U.S. at 563.) It is not enough for a court to decide that some right *may* be affected by the exercise of free speech. (*Hurvitz*, 84 Cal.App.4th at 1241.) Because there is *no* evidence whatsoever of what information the Blog may or may not have or may or may not publish, the City cannot show there is any threat.

Attempts to obtain this information from Defendants, such as the City's request to appoint a "third-party forensic expert to examine the computers, servers, and storage media within Defendant's possession, custody or control, or within the possession, custody or control of any members, employees, writers, volunteers, agents, and any persons action in concert with them....," which was correctly denied by the Trial Court, would violate the Shield Law. (Cal. Const., Art. I, § 2,; Evid. Code § 1070].)

The purpose of the Shield Law (is to keep newspersons from becoming agents of discovery, to maintain their neutrality and objectivity, and "to protect [their] ability to gather and report the news." (*Id.* at 806, fn. 20.) This protection "reflects a strong interest in the Legislature and the people of this state to afford newspersons the highest possible level of protection from compelled disclosure of confidential sources and confidential information." (*Playboy Enterprises, Inc. v. Superior Court* (1984) 154 Cal.App.3d 14, 27.) "[N]othing in the shield law's language or history to suggest the immunity from contempt is qualified such that it can be overcome by a [civil litigant's] showing of need for unpublished information[.]" (*Miller v. Superior Court* (1999) 21 Cal.4th 883, 890.) Nor can a journalist lose his or her shield law immunity against being compelled to disclose how information came into the journalist's possession merely by reporting some of the information obtained. (*In re Jack Howard* (1955) 136 Cal.App.2d 816, 818-19.)

In addition to the constitutional and statutory protections offered by California's Shield Law, journalists have a qualified testimonial privilege that derives from the First Amendment to the United States Constitution. The Ninth Circuit has expressly recognized a qualified privilege, grounded in the First Amendment, permitting journalists to resist the disclosure of unpublished information obtained during the course of newsgathering activities:

> Rooted in the First Amendment, the privilege is a recognition that society's interest in protecting the integrity of the newsgathering process, and in ensuring the free flow of information to the public, is an interest of sufficient social importance to justify some

> incidental sacrifice of sources of facts needed in the administration of justice.

Shoen v. Shoen (*"Shoen I")* (9th Cir. 1993) 5 F.3d 1289, 1292 (internal quotations and citation omitted); see also *Mitchell* v. Superoir Court (1984) 37 Cal.3d 268, 274-84. Likewise, the California Supreme Court expressly has recognized a qualified journalists' privilege arising from the First Amendment. (*See*.)

E. Privilege, Privacy, Or Even Competing Constitutional Rights Are Insufficient To Justify The Extraordinary Remedy Of A Prior Restraint.

The City argued that while the First Amendment is a high priority, "the attorney-client privilege ... has even higher priority in our jurisprudence." (Ex. L., p. 6.) While the Trial Court apparently agreed (Ex. L., p. 25), it is clear that the law does not. California has already dealt squarely with this issue.

In a case where the trial court issued an order barring the disclosure of information protected by the patient/physician privilege, which the trial court found would have violated the patients' rights of "privacy and dignity," the court of appeal found that sparing citizens from embarrassment, shame, or even intrusions into their privacy has never been held to outweigh the guarantees of free speech in our federal and state Constitutions. (*Hurvitz,* 84 Cal.App.4th at 1244.) "Respondent can point to no case where any court in the nation has held that a threatened violation of the patient/physician privilege or ***any other privilege*** justifies a prior restraint of speech." (*Id.* at 1243.) The court recognized that while there are "statutes prohibiting health care providers from disclosing confidential health care information," "they cannot support a prior restraint on speech." *Ibid.*

The Supreme Court has also made clear that merely "[d]esignating the conduct as an invasion of privacy" does not warrant a prior restraint. (*Organization for a Better Austin*, 402 U.S. at 419-420 [rejecting claim that privacy interests justified restraint against distribution of leaflets].) Courts have also denied requests for prior restraints even when competing constitutional rights are at stake. (*See, e.g.*, *Nebraska Press,* 427 U.S. at 556-561 [Supreme Court struck down a prior restraint that barred the media from publishing information about a defendant's alleged confession in a highly-publicized mass-murder case in rural Nebraska, rejecting the argument that the potential prejudice to the defendant's Sixth Amendment right to a fair trial trumped the press' First Amendment right to be free of government censorship]; *United States v. Salameh* (2d Cir. 1993) 992 F.2d 445, 446 ["[a] prior restraint on constitutionally protected expression, even one that is intended to protect a defendant's Sixth Amendment right to trial before an impartial jury, normally carries a heavy presumption against its constitutional validity"]; *Providence Journal,* 820 F.2d 1342, 1345, modified on reh'g en banc, 820 F.2d 1354 (1st Cir. 1987), cert. dismissed on other grounds, *United States v. Providence Journal Co.* (1988) 485 U.S. 693 [reversing "temporary restraining order barring publication of [FBI] logs and memoranda" to protect surveilled citizen's Fourth Amendment rights...].)

The interests asserted by the City pale in comparison to those already rejected by our courts as insufficient to support a prior restraint.

F. **The Requested Relief Is Ineffective Since The Information Has Already Been Published or Made Public By The City.**

While the City claims that the documents that were in its Dropbox account, which are now subject to the TRO, were confidential, documents pertaining to the conduct of the public's business are presumptively public and disclosable under the CPRA (*Sander v. State Bar* (2013) 58 Cal.4th 300, 323 [CPRA "establishes a presumptive right of access to any record created or maintained by a public agency that relates in any way to the business of the public agency…"].) Others have already been published on the Blog. (Strebe Decl., ¶¶ 76-80, 84.)

Even if the some of the documents contained on the City's Dropbox account have not been publicly disclosed and contain confidential or nondisclosable information, it is the City's burden to point to the particular nondisclosable documents and justify why they are exempt from disclosure. (Govt' Code § 6255 ["[t]he agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this chapter or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record"]; *see also San Gabriel Tribune v. Sup. Ct.* (1983) 143 Cal. App.3d 762, 773 ["the burden of showing that nondisclosure is justified is on the agency seeking to withhold the requested record…"]; *CBS Broadcasting, Inc. v. Sup. Ct.* (2001) 91 Cal.App.4th 892, 908 ["the burden of proof is on the proponent of nondisclosure…"].) The City's declarations fall far short of this burden and address the documents contained in the Dropbox in only the most generalized manner.

Prior restraints are particularly inappropriate where, as here, the information sought to be suppressed already has been made available to the public. Simply put, once "the cat is out of the bag," any request to restrain publication or to seal the information is "ineffective" in advancing the countervailing compelling interest in secrecy. As the Second District explained when it denied a request for a prior restraint in *Hurvitz*, 84 Cal.App.4th at 1245, "neither the state nor the federal Constitution permits the court to lock the barn door after the horse is gone." (See also *In re Charlotte Observer* (4th Cir. 1990) 921 F.2d 47 [vacating injunction as an impermissible prior restraint, noting that "[o]nce announced to the world," "the cat [was] out of the bag" and "the information lost its secret characteristic, an aspect that could not be restored by the issuance of an injunction"]; *Bank Julius Baer & Co. Ltd. v. WikiLeaks* (N.D. Cal 2008) 535 F.Supp.2d 980, 985 [refusing to enjoin further publication of bank records and related documents that had been posted on defendant's website]; *Kamakana v. City and County of Honolulu* (9th Cir. 2006) 447 F.3d 1172, 1184 [because "many names or references for which the United States sought redaction were either already publicly available or were available in other documents being produced" to the press, government could not meet its burden of showing the information could remain confidential].)

Whether the genie is out of the bottle, the cat is out of the bag, or the chicken has flown the coop, an injunction could no longer protect the interest that the City seeks to protect, even if it were worthy of such an extraordinary remedy.

G. <u>This Is A SLAPP Lawsuit</u>.

The restraining order should have been denied because the City cannot prevail in this action because its meritless Complaint amounts to a retaliatory strategic lawsuit against public participation, and is prohibited by Code of Civil Procedure, section 425.6.

At the first prong, "the critical consideration is whether the cause of action is based on the defendant's protected free speech or petitioning activity." (*Navellier v. Sletten* (2002) 29 Cal.4th 82, 89.) A party meets this burden by demonstrating that the act underlying the claim fits one of the categories spelled out in section 425.16(e). (*Braun v. Chronicle Publ'g Co.* (1997) 52 Cal.App.4th 1036, 1043.)

Section 425.16(e) defines an "act in furtherance of a person's right of petition or free speech under the United States or California Constitution in connection with a public issue" to include:

> (1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law,
>
> (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law,
>
> (3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or
>
> (4) any other conduct in furtherance of the exercise of the constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.

Here, the City's claims all arise from protected activity. The act of filing a CPRA request, newsgathering, reporting on issues of public interest, the exercise of its right to Petition in filing the CPRA lawsuit are all protected by Section 425.16(e). *(See e.g. Lieberman v. KCOP Television* (2003) 110 Cal.App.4th 156, 162, 166 (2003) [SLAPP statute broadly applies to claims arising from allegedly tortious television newsgathering activities; "conduct" within the meaning of the SLAPP statute "is not limited to the exercise of [the] right of free speech, but to all conduct in furtherance of the exercise of the right of free speech"]; *Lafayette Morehouse v. Chronicle Publ. Co.* (1995) 37 Cal.App.4th 855, 864 [anti-SLAPP statute protected a newspaper and its reporters in a lawsuit "based on [their] news reporting activities"]; *Braun*, *supra*, 52 Cal.App.4th at 1043-45 [applying anti-SLAPP statute to media defendants; affirming order striking claims arising from articles about a state investigation]; *Sipple v. Found. for Nat'l Progress* (1999) 71 Cal.App.4th 226, 240 [granting anti-SLAPP motion as to libel claim arising from article about custody dispute); *Briggs v. Eden Council for Hope and Opportunity* (1999) 19 Cal.4th 1106, 1117 [citing with approval Lafayette court's holding that statute applies to media defendants]; *Thomas v. Los Angeles Times Communs., LLC* (2002) 189 F.Supp.2d 1005, 1013-1015 [striking lawsuit asserting claims of defamation based on article that raised questions about plaintiffs alleged World War II activities].

Once it is determined that the subject matter of litigation arises out of the Blog's protected activity, the City must show a probability of prevailing on its claim. In this case, for all the reasons

set forth above, the City could never meet its burden because the relief it seeks is an unconstitutional prior restraint and an order to identify and confiscate journalists' unpublished and source material. (*ALADS*, 239 Cal.App.4th at 821 [finding that no determination as to whether the complaint adequately alleged a cause of action for invasion of privacy under the California Constitution "because the injunction plaintiffs seek would be an unconstitutional prior restraint"].) There is no authority, either in this state or in the nation, that would allow a government agency to stop the press from publishing information it lawfully obtained. (*Id.* at 819 [noting the wealth of both State and Federal case law, discussing the protection journalists and the press enjoy under the First Amendment where there have been allegations that published or disclosed content had been illegally obtained by the source].)

In order to avoid the obvious application of the anti-SLAPP statute, the City alleges that the Defendants have committed criminal acts – a serious and completely unfounded legal claim. However, the mere allegation of illegal activity is wholly insufficient to defeat an anti-SLAPP motion. If mere allegations of criminal conduct were sufficient to overcome these fundamental protections or an anti-SLAPP motion, allegations of criminal conduct would be in every complaint. But case law undermines such a result.

While illegal conduct has been long held to fall outside of protected speech, to defeat an anti-SLAPP motion, the criminal illegality must be conceded or the evidence must be "uncontroverted and conclusive" to trigger an exemption from anti-SLAPP because "to find otherwise would eviscerate the anti-SLAPP

statute's protections because the plaintiff could preclude the statute's application simply by alleging criminal conduct by the defendant." (*Safari Club International v. Rudolph* (9th Cir. 2017) 845 F.3d 1250, 1259.)

In *Flatley v. Mauro* (2006) 39 Cal.4th 299, 320, the California Supreme Court first confirmed that the protections of the anti-SLAPP statute are not applicable when "the defendant concedes, or the evidence conclusively establishes, that the assuredly protected speech or petition activity was illegal as a matter of law." (*Id.* at 320.) While the Flatley court ultimately held that the conduct in that case was uncontested and illegal as a matter of law, it emphasized that the holding was "based on the specific and extreme circumstances" of the case and differentiated between illegal conduct which can be proven as a matter of law "either through defendant's concession or by uncontroverted and conclusive evidence" and contested allegations of illegal conduct. (*Id.* at 332.)

Recently, the California Supreme Court affirmed addressed the issue again, finding allegations of illegal conduct insufficient to overcome the first prong of the anti-SLAPP statute. (*City of Montebello v. Vasquez* (2016) 1 Cal.5th 409, 424.) "We made it clear in *Flatley* that conduct must be illegal *as a matter of law* to defeat a defendant's showing of protected activity. The defendant must concede the point, or the evidence conclusively demonstrate it, for a claim of illegality to defeat an anti-SLAPP motion at the first step." (*Id.*)[10]

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[10] Numerous appellate cases have applied this principle, finding that mere allegations of illegal activity are insufficient to deny an

However, this case does not involve a situation where the allegations of illegal conduct are uncontested. Despite the City's claims, Defendants have vigorously contested the City's baseless and unfounded allegations from the outset.[11] (Lindsay Decl., Ex. D.) The Blog has never even conceded that it accessed the Dropbox files at

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otherwise meritorious motion to strike. (*See, e.g., Zucchet v. Galardi* (2014) 229 Cal.App.4th 1466, 1477–1480, [exemption not satisfied because the allegedly false testimony and statements to federal authorities were "still very much in dispute"]; *Reed v. Gallagher* (2016) 248 Cal.App.4th 841, 853 [claim of violation of Pen. Code § 115.2 was insufficient because no proof of intent to deceive or evidence of malice]; *Hansen v. California Dept. of Corrections and Rehabilitation* (2008) 171 Cal. App. 4th 1537, 1542 [allegations that defendant was involved in a "web of lies" that resulted in the search of the plaintiff's home was insufficient]; *Cabral v. Martins* (2009) 177 Cal.App.4th 471, 482 [attorney's modification of an estate plan that allegedly assisted in the evasion of child support was "neither inherently criminal nor otherwise outside the scope of normal, routine legal services" to bar the defendant's use of the anti-SLAPP statute]; *M.F. Farming, Co. v. Couch Distributing Co.* (2012) 207 Cal. App. 4th 180, 195–197 (disavowed in part, on other grounds, in *Baral v. Schnitt* (2016) 1 Cal.5th 376, 396, fn. 11) [submitting allegedly fraudulent plans to a city in connection with permitting process did not trigger illegality exemption and bar use of the anti-SLAPP statute]; *Dwight R. v. Christy B.* (2013) 212 Cal.App.4th 697, 711–713 [allegation that therapist conspired to falsify evidence insufficient because the therapist did not concede that she engaged in any unlawful activity nor was there any uncontroverted evidence that her activities were unlawful as a matter of law].)

[11] Moreover, much of the City's substantive claims in this lawsuit are based on nothing more than information and belief. (*See*, e.g., Ex. A, ¶¶ 3-6, 30, 32, 36, 41, 42, 71, 76.)

issue or that it has any confidential records in its possession.[12] The City cannot rule out the multitude of other possible ways in which the Blog came to publish the handful of records that the City claims were amongst the thousands in its public-facing Dropbox account. For example, it cannot show that the documents were not obtained by a third-party from the Dropbox account, and then given to the Blog, nor can it rule out that someone from the City or the City Attorney's office leaked the documents to the Blog. Some of the documents were communications with third parties, such as the draft settlement agreement which would have presumably been sent to counsel for the opposing party. Thus, people outside of the City in possession of the documents could have provided them to the Blog.

The documents that were in its Dropbox account are presumptively public and disclosable under the CPRA and the City's "evidence" claiming otherwise is speculative, contains inadmissible legal opinions, and is based on various *post hoc ergo propter hoc* ("after this, therefore because of this") fallacies that could never "conclusively establish" illegality, even if one could find that accessing a link provided by the City could ever be considered "illegal" activity, a dubious claim in its own right.

H. <u>Conclusion.</u>

The basic purpose of the First Amendment is to prevent the government from imposing prior restraints against the press.

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[12] Except of course, for the records that were published in connection with the Blog's reporting, which the City claims are confidential and the Blog disputes. In fact, that dispute is part of the basis of Mr. Ferguson's CPRA lawsuit against the City, filed two weeks before the City retaliated with this lawsuit.

"Regardless of how beneficent-sounding the purposes of controlling the press might be," the Court has "remain[ed] intensely skeptical about those measures that would allow government to insinuate itself into the editorial rooms of this Nation's press." (*Nebraska Press*, 427 U.S. at 560-561.)

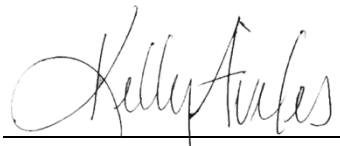
Consistent with that principle, over the last 75 years, the United States Supreme Court repeatedly has struck down prior restraints that limited the press' right to report about court proceedings. The Court has made clear that a prior restraint may be contemplated only in the rarest circumstances, such as where necessary to prevent the dissemination of information about troop movements during wartime, *Near*, 283 U.S. at 716, or to "suppress[] information that would set in motion a nuclear holocaust." (*New York Times*, 403 U.S. at 726 (Brennan, J., concurring).)

This case does not come close to presenting such extraordinary circumstances. Thus, the City cannot prevail as a matter of law, regardless of how the records were originally obtained. The restraining order is flatly unconstitutional and Petitioners, therefore, respectfully request this Court issue an immediate, emergency stay of the temporary restraining order and the pending Trial Court proceedings, and to issue an alternative and peremptory writ of mandamus or other appropriate relief directing Respondent Superior Court of California, County of Orange to (1) dissolve the temporary restraining order; (2) to desist or refrain from further proceedings in the action until further order from this Court;

(3) and to show cause before this Court as to why it should not enter an order against the City and in favor of Defendants in this matter.

DATED: October 30, 2019

LAW OFFICES OF KELLY A. AVILES



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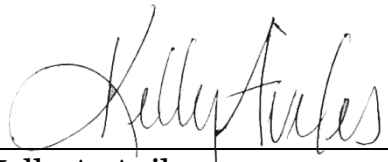
FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, and DAVID CURLEE

CERTIFICATE OF WORD COUNT

I, Kelly A. Aviles, am counsel in this matter and I hereby certify, that this Writ Petition contains 11,164 words, including footnotes, excluding tables, the cover information, the Certificate of Interested Entities or Persons, this Certificate of Word Count, and the attached orders, according to the computer program count used to produce this brief. Therefore, the number of words in the Petition complies with California Rules of Court, Rules 8.204(c)(1) and 8.486(a)(6).

DATED: October 30, 2019

LAW OFFICES OF KELLY A. AVILES



Kelly A. Aviles
Attorney for Petitioners
FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, and DAVID CURLEE

Exhibit A

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 2

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EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC
Judge Thomas A. Delaney

COMPLAINT FOR:

1) **VIOLATION OF COMPREHENSIVE COMPUTER DATA ACCESS AND FRAUD ACT (CAL. PEN. CODE § 502 *et seq.*);**

2) **VIOLATION OF THE COMPUTER FRAUD AND ABUSE ACT (18 U.S.C. § 1030 *et seq.*);**

3) **VIOLATION OF CAL. GOV'T CODE § 6204 *et. seq.*;**

4) **CONVERSION;**

5) **TRESPASS TO CHATTELS; AND**

6) **CONSPIRACY**

The CITY OF FULLERTON, a municipal corporation, ("the City") brings this Complaint against FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, an individual, DAVID CURLEE, an individual, CHRISTOPHER TENNYSON, an individual, and Does ONE through TWENTY (collectively "Defendants"), and hereby alleges as follows:

PRELIMINARY AND GENERAL ALLEGATIONS

1. Plaintiff City of Fullerton was and is a municipal corporation duly organized and existing under and by virtue of the laws of the State of California, and located in the County of Orange.

2. Upon information and belief, Defendant Friends for Fullerton's Future (the "Blog") is an internet blog accessible at the following Internet address: https://www.fullertonsfuture.org/. The Blog is registered to George and Tony Bushala, to an address in Fullerton, California, and the mailing address listed on the Blog's website is a P.O. Box located in Fullerton, California.

3. Plaintiff is informed and believes that Defendant JOSHUA FERGUSON is an individual who has at all times material to this action been one of the authors of the Blog and has been listed as the primary contact for the Blog.

4. Plaintiff is informed and believes that Defendant DAVID CURLEE is an individual who has at all times material to this action been one of the authors of the Blog.

5. Plaintiff is informed and believes that Defendant CHRISTOPHER TENNYSON is a co-worker of Joshua Ferguson at Fullerton Cameras, who assisted Mr. Ferguson with accessing and downloading documents from the City's Dropbox account, without the City's permission, consent or authority

6. Plaintiff is informed and believes that other writers for the Blog include: Travis Kiger, Lonnie Machin, and Joe Sipowicz.

7. The true names and capacities of DOES 1 to 20 are currently unknown to Plaintiff, who therefore sues such Defendants by their fictitious names, and will amend this Complaint to show their true names and capacities as such time as they are ascertained. Upon information and

belief, DOES 1 to 20 are adult individuals who are employed by, work for, assist, volunteer or are otherwise involved in the furtherance of the activities of the Blog, and conspired with the Defendants named herein, in order to accomplish the acts outlined in this Complaint.

8. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, at all times herein-mentioned, have done business in or reside in the City of Fullerton, in the County of Orange, in the State of California, and that all of the Defendants' actions alleged herein have occurred, been carried out, been furthered, or resulted in injury within the City of Fullerton in the County of Orange.

FACTUAL BACKGROUND

9. On or about June 13, 2019, the City of Fullerton became aware that certain of its privileged and confidential information had been published without its permission on the Blog.

10. The confidential information that was accessed, downloaded and published without permission relates to various topics, including but not limited to privileged or otherwise exempted communications relating to the City of Fullerton Police Department's internal investigations of law enforcement agents as well as communications and draft agreements relating to the terminations and resignations of several law enforcement agents and non-sworn former employees. The Blog has published privileged and confidential material damaging to the reputation and goodwill of the City and its officials, employees and former employees, with the apparent intent to mislead and incite the public.

11. Upon learning about the publication of excerpts from privileged and confidential documents, the City of Fullerton began an extensive investigation into the nature and scope of the incident, including the method by which the Blog and its authors had obtained the privileged and confidential material. During its investigation of the incident, the City of Fullerton determined the privileged and confidential City documents accessed, downloaded, and posted by Defendants without the City's permission or authorization originated from specific folders within the City's file sharing account ("Dropbox") intended for attorney review prior to any potential production in response to Public Records Act (PRA) requests made by Defendants, including Defendants Joshua

Ferguson and David Curlee. The primary source from which the documents that were published on the Blog beginning on or about June 5, 2019 were extracted was a Dropbox zip file stored in the City's Dropbox account named "pr1919-Joshua Ferguson.zip" (the Subject File). The Subject File housed approximately 11,000 emails plus attachments that were culled by a City Information Technology (IT) employee, with assistance from one of the City's attorneys, and were collected together for attorney review for purposes of responding to a PRA request made by Defendant Joshua Ferguson.

12. The PRA request made by Mr. Ferguson to the City that is at issue is one of many he has submitted to the City. The particular request at issue (PRR 19-19) was extremely expansive and sought all emails referencing any of the following eight (8) search terms: "Record Retention," "Police Records," "Retention," "Personnel Files," "Deleted Records," "Oversight," "Personnel Records," and "Limitations," without any limitation in scope as to date or custodian. The original request would have entailed searching across the email boxes of approximately 500 City officials and employees. When City IT first tested Mr. Ferguson's requested search terms against one individual's email box, the search terms returned approximately 25,000 emails plus attachments, for that one individual alone.

13. Because of the extreme breadth of Mr. Ferguson's request and the immensity of the potentially responsive documents returned by Mr. Ferguson's requested terms, the City Clerk's office asked Mr. Ferguson to narrow his request. Even after narrowing his initial request from approximately 500 City users to approximately 20 persons, the searches run by City IT using Mr. Ferguson's requested narrowed search terms against the requested individuals' emails still returned approximately 11,000 emails plus attachments. These 11,000+ records were comprised of records that were only *potentially* responsive to Mr. Ferguson's request and included:

(a) Records that were likely *not* of interest to Mr. Ferguson but were brought in as false positives by the breadth of the requested search terms;[1]

[1] For example, one of Mr. Ferguson's requested search terms was "Brady," which given the other requested search terms related to police records probably refers to the Brady doctrine, a pretrial discovery rule established by *Brady v. Maryland*, 373 U.S. 83 (1963) that requires the prosecution to turn over all exculpatory evidence to a defendant in a criminal case. However, running the search term against a body of documents would necessarily bring in all documents that make any reference to "Brady," including references to individuals, streets, buildings and other entities and objects with the word "Brady" as part of its name. Such documents would be considered "false positives," as they are

(b) Records that were expressly exempted from disclosure under the Public Records Act, including but not limited to: (i) preliminary drafts, notes, or interagency or intra-agency memoranda not retained by the public agency in the ordinary course of business, Cal. Gov't Code § 6254(a); (ii) records pertaining to pending litigation to which the public agency is a party, or to claims made pursuant to Division 3.6 (commencing with Section 810), Cal. Gov't Code § 6254(b); (iii) personnel, medical or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy, Cal. Gov't Code § 6254(c); and (iv) law enforcement investigative records, Cal. Gov't Code § 6254(f);

(c) Records exempted from disclosure pursuant to other applicable federal and state law provisions, Cal. Gov't Code § 6254(k), including: (i) attorney-client privileged records, Cal. Evid. Code § 950 et seq.; *Roberts v. City of Palmdale*, 5 Cal. 4th 363 (1993); (ii) attorney work product, Cal. Civ. Proc. Code § 2018.010 et seq.; (iii) peace officer personnel records, Cal. Pen. Code § 832.7 et seq.; and (iv) confidential City Council closed session information, Cal. Gov't Code § 54963;[2] and

(d) Documents that would need to be redacted for information subject to third party privacy rights (such as social security numbers, driver's license numbers, and dates of birth, as well as phone numbers, street addresses, and/or email addresses of certain individuals) prior to production, see, e.g., Cal. Gov't Code §§ 6254.2, 6254.4, 6254.16, 6254.21, 6254.29; Cal. Pen. Code § 841.5(a).

14. Upon information and belief, these documents were placed by a City IT employee in a Dropbox zip file containing the 11,000+ emails (plus attachments) that was only shared among four (4) City employees/agents, including (1) the City IT employee who created the Dropbox folder in question; (2) the IT Manager; (3) a City Clerk employee who was assisting in the preparation of the City's response to Mr. Ferguson's PRA request No. PR 19-19; and (4) a Deputy City Attorney

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technically responsive to the search term request, but not substantively responsive to the request.

[2] Such privileged and confidential documents included communications between City employees and the City's attorneys (from both the City Attorney's office as well as retained outside counsel) relating to a plethora of sensitive subject matters, including employee separations and discipline, investigations, proposed settlement agreement terms, as well as legal advice concerning PRA responses.

who was reviewing the records in the context of assisting the City with its response to Mr. Ferguson's PRA request.

15. Based on the nature of the search terms requested (e.g., "Personnel Records," "Personnel Files" and "Police Records"), the 11,000+ records contained in the Subject File necessarily included highly confidential and privileged emails and attachments relating to sensitive subject matters such as ongoing personnel investigations, Police Department internal investigations, as well as information subject to third party privacy and protected from disclosure (e.g., social security numbers, driver's license numbers, health records, California Public Employees Retirement System data, and other personal, confidential and private information).

16. Because of the overbreadth and immensity of the 11,000+ records returned from Mr. Ferguson's narrowed search terms, on May 24, 2019, the City Clerk asked that Mr. Ferguson further narrow his request, informing him that a review and redaction of the 11,000+ records returned by his revised request would require over 100 hours of attorney time at an hourly rate of $199.83 (roughly $20,000) to review those records for responsiveness, the applicability of various exemptions and privileges, and to apply any necessary redactions of private information. That same day, Mr. Ferguson responded that he would consult with his attorney about the City's request that he narrow his PRA request and would "get back" to the City regarding the matter.

17. Neither Mr. Ferguson nor his attorney followed up with the City regarding further narrowing of the PRA request. That is because Mr. Ferguson and his associates had already been knowingly and systematically accessing and downloading folders and files from the City's Dropbox account without the City's knowledge, consent or authorization since the end of 2017, including not only the Subject File, but many other folders and files that were clearly intended for attorney review and not for production to outside third parties. In fact, Mr. Ferguson and his associates had already downloaded the Subject file on May 10, 2019.

18. Mr. Ferguson and his associates utilized methods to mask their identity and computer locations in order to cover up their unauthorized accesses into and downloads from the City's Dropbox account. Specifically, they used anonymizing Virtual Private Networks (VPNs) and The Onion Router (TOR) to mask their IP addresses and make it appear as if they were

accessing and downloading folders and files through mostly foreign exit nodes.

a. Mr. Ferguson's early accesses into and downloads from the City's Dropbox were characterized by (1) the logging of the email addresses tied to the Dropbox accounts he used to download the City's documents;[3] and (2) his use of a foreign VPN service through foreign exit nodes (primarily located in Europe).

b. Starting on November 6, 2018, Mr. Ferguson actively logged out of his Dropbox account or disabled the automatic disclosure function of his web browser's persistent information (cookies), which resulted in his accesses and downloads no longer recording his email addresses. Many of these later unidentified VPN accesses and downloads through foreign exit nodes can be attributed to PureVPN, the specific foreign VPN service used by Mr. Ferguson, as reflected on the activity log for the City's Dropbox account.

c. On January 16, 2019, Defendant Christopher Tennyson, Mr. Ferguson's co-worker at Fullerton Cameras, accessed and downloaded a Dropbox file named "PRRS01152019_JF" without the City's permission or authorization. Such file was not produced to him and the City had not authorized it to be produced or forwarded to him. This folder contained PST files for attorney review only.[4]

d. Beginning roughly in May 2018, unidentified user(s) began using a TOR service to access the City's Dropbox account routinely up until June 21, 2019 when the City closed its Dropbox account entirely. These TOR accesses were through mostly foreign exit nodes. The City believes one if not all of these TOR accesses and downloads

[3] The activity log reflecting all events associated with individual folders and files added to the City's Drobox account shows accesses and downloads associated with the following of Mr. Feguson's email addresses: "joshua@joshua ferguson.com," "joshua@thehourlystruggle.com," and "info@fullertoncameras.com." Mr. Ferguson is the co-host of The Hourly Struggle Podcast associated with "thehourlystruggle.com" domain name. See https://twitter.com/ hourlystruggle?lang=en.

[4] PST files are generated by the City's IT department through a search run against the City's emails using certain search terms and other parameters such as date scope and user limitations. PST files are the native email storage format used by Microsoft Outlook email client and they can also be generated from a Microsoft Exchange email server by running search terms and other parameters such as date scope and user limitations against an email server. PST files are databases with their own folder hierarchy and may contain up to millions of email messages, attachments, and other data such as notes or calendar items within a single computer file. PST files can only be opened within Outlook or using other special software. An ordinary consumer would not know how to open a PST file. Double clicking on a PST file would not open it even with Outlook installed.

can be attributed to Mr. Ferguson's associate, Defendant David Curlee, another writer for the Blog. This is based on the fact that the only third party access and download of one of the Dropbox files produced by the City to Defendant Curlee (and no other third parties) ("PRR Pro Card 5-29-19.zip") was only accessed by a TOR user through a foreign exit node, and not by Defendant Curlee using a non-anonymized method of access, thereby raising the unmistakable inference that Defendant Curlee was the TOR user.

e. The unidentified accesses and downloads using foreign VPN and/or TOR services through mostly European exit nodes can also be attributed to Mr. Ferguson, Mr. Curlee (and possibly their other associates) as (1) there is no evidence tying any other users to the use of a foreign VPN or TOR service; (2) the odds that European citizens using VPN or TOR services to mask their IP addresses to search through records posted to the Dropbox account of a small city like Fullerton, California is infinitesimally small, if not non-existent; and (3) the fact that many of the unidentified accesses and downloads utilized PureVPN, the same foreign VPN service Mr. Ferguson used during his early accesses into and downloads from the Dropbox account when his email addresses were still associated with his use of PureVPN in his effort to anonymize his identity.

19. Some of the additional Dropbox folders and files the City has reason to believe Defendants accessed and downloaded without the City's permission or authority, utilizing anonymizing VPN or TOR services include, but are not limited to:

"(Addendum No. 1 Plans).zip"
"1_Laguna Lake Files"
"129 W Commonwealth – Graphics"
"1310 Sorrento Pl"
"19-135 Datathehourlystruggle.com"
"52588 BID"
"56019 Fiber"
"ACUSA_H21 Leases"
"ACUSA_PRR.zip"
"Airport Database/Fullerton Municipal Airport.mdb"
"AxonPRR.zip"
"CE_PRR_KC.zip"
"Citywide Bicycle \u0026 Ped. Improvement Project"
"COF_CADD_PACKAGE-REV-2015-08"
"council_20180430.zip"
"Drainage Master Plan/1996 Boyle/COF_comprehensive master plan of drainage_1996.pdf"

"Dukes"
"FD_20180430.zip"
"Hillcrest Park"
"JF_PRR_2.zip"
"JF_PRR20181012.zip"
"JF_PRR_PD.zip"
"KCCPRR - Redacted.zip"
"Keith Cangiarella PRR Responsive E-mails.zip"
"Kevin/COF_Kevin.docx"
"Lease Files.zip"
"Lucity"
"NARCOTICS"
"Police"
"PRR 18-225 Replogle Responsive E-mails.pdf"
"PPR_18_326_Curlee.zip"
"PR19-171VD_1_2.zip"
"pr1919 - Josh Ferguson.zip"
"PRR_1600_2.7z"
"PRR_19-134_data@thehourlystruggle.com.zip"
"PRR Accela 8-17-17"
"PRR_AIR20180604.zip"
"PRR_CE.zip"
"PPR_Cox.zip"
"PRR_JF_20181002.zip"
"PRR Pro Card 5-29-19.zip"
"PRRS01082019"
"PRRS01082019.zip"
"PRRS01092019.zip"
"PRRS01092019_all.zip"
"PRRS01152019_JF.zip"
"Public Records Request"
"Vernoica Duarte PRR"
"Veronica Duarte - Air Combat"
"Veronica Duarte.zip"
"VM.zip"
"Water"

20. Of the above-listed Dropbox folders and files downloaded without the City's authority, the following folders contained PST files that were intended for attorney review only:

"ACUSA_PRR.zip"
"council_20180430.zip"
"HL_PRR"
"JF_PRR_2"
"JF_PRR20181012"
"pr1919 - Josh Ferguson"
"PRR_19-134_data@thehourlystruggle.com"
"PR19-171VD_1_2.zip"
"PPR_Cox.zip"
"PRR_JF_20181002"
"PRRS01082019.zip"
"PRRS01092019.zip"
"PRRS01092019_all.zip"

"PRRS01152019_JF.zip"
"PRRS02042019_VD.zip"
"PRRS02042019_VD_2.zip"
"Tiger_Signal_PRR.zip"

21. Beginning on or about June 5, 2019, despite having received an email from the City Clerk on May 24, 2019 indicating that his request was still too overbroad and burdensome for the City to respond to without Defendant Ferguson further narrowing his request, Defendants began to post on the Blog excerpts and information from the City's privileged and confidential records they had taken from the Subject File (and other such files) created only for attorney review. The City has determined that many of the City's privileged and confidential emails and documents posted on the Blog were taken from the Subject File containing the 11,000+ emails and attachments. Most, if not all, of the privileged and confidential City documents posted to the Blog fall under one or more of the Public Records Act exemptions noted above, and included clearly privileged attorney-client privileged communications, as well as sensitive and confidential records relating to ongoing personnel investigations, Police Department internal investigations, and the like, none of which were provided to the Defendants by the City. These records, posted without the City's permission or authorization, were of a nature that would never have been provided by the City to the Defendants or any other third parties in response to a PRA request, and could only have been obtained by the Defendants without the City's permission or authorization. From the City's prior responses to Defendants' numerous prior PRA requests submitted to the City, Defendants were well aware of the various exemptions to the PRA established by law in California applicable to confidential and privileged City records. Nevertheless, after knowingly accessing the City's Dropbox account files and folders, without the City's consent or permission, Defendants posted and published confidential and privileged City records on the Blog

22. On June 13, 2019, the City sent a letter to the Blog's representative, Defendant Joshua Ferguson, demanding that the Blog (1) remove the City's confidential documents from the Blog; (2) refrain from posting any other confidential City documents obtained without authorization; (3) immediately return all confidential City documents in Defendants' possession; and (4) immediately delete all electronic copies of confidential City documents in Defendants'

possession.

23. On June 14, 2019, Mr. Ferguson responded that The Friends for Fullerton's Future is represented by counsel and asked that any future correspondence be addressed to its counsel. Said counsel erroneously claimed that Mr. Ferguson obtained the confidential City documents through legal means, but made no effort to establish how Defendant Ferguson came into possession of the privileged and confidential documents he and his associates posted on the Blog.

24. On July 11, 2019, the City sent another cease and desist letter to legal counsel for Mr. Ferguson and the Blog, specifically invoking California Government Code § 6204(a)(2) to seek the return of any and all folders and files obtained from the City of Fullerton's Dropbox account that were not directly provided by the City to Mr. Ferguson or any of the Blog's agents or associates, including but not limited to the Subject File "pr1919 – Joshua Ferguson." (See Exhibit A).

25. Again, instead of complying with the City's demands, Defendants instead knowingly continued to post additional excerpts and information from privileged and confidential City records taken from the City's Dropbox folders and files without its permission or authorization.

26. As a result of the Defendants' actions, the City and its employees and officials have been injured through (1) the invasion of privacy caused by the unauthorized disclosure of privileged, confidential and private information, in violation of HIPAA, exemptions under the Public Records Act and other applicable federal and state laws; and (2) the damage to their reputation stemming from Defendants' false allegations published on the Blog relating to such unauthorized disclosure of confidential, private and privileged material.

27. Without an order (1) instructing Defendants to remove the inappropriately published privileged and confidential City documents from their Blog and (2) enjoining and preventing Defendants from publishing further information derived from clearly privileged and confidential communications between the City's employees and its attorneys and other confidential City documents exempted from disclosure under the Public Records Act, the City will continue to be subjected to great and immediate irreparable harm to the privacy and reputation of its employees and officials, and the invasion of its attorney/client relationships.

28. The City has been harmed by the Defendants' conduct and has suffered damages in excess of $5,000, including but not limited to the following: (1) the continuing costs connected with the investigation of the source, nature and scope of the theft of the City's confidential and privileged records; and (2) the continuing costs of pursuing this action against the Defendants to prevent further publication of privileged and confidential records and information taken from the City's Dropbox account without authorization and to recover the records taken. The City anticipates will also face the costs of notifying each person whose confidential information has been improperly and illegally accessed by the Defendants, in violation of their right to privacy, and may also face the following future damages: (1) the costs of defending any data breach claims brought by any person whose confidential information was improperly and illegally accessed by the Defendants; and (2) the costs of defending any claims from current and former employees stemming from the unauthorized release and/or publication of their confidential information.

FIRST CAUSE OF ACTION

Comprehensive Computer Data Access and Fraud Act (CCDAFA)

Cal. Penal Code § 502 *et seq.*

(Against All Defendants)

29. Plaintiff incorporates herein by reference each of the allegations in each and all of the preceding paragraphs of this Complaint as though fully set forth herein.

30. Plaintiff is informed and believes that Defendants knowingly, improperly, unlawfully and wrongfully, and with the intent to defraud and harm the City, accessed the City's protected data from its Dropbox account, and without the City's permission downloaded the City's confidential emails and attachments through their improper and unauthorized access of the City's Dropbox account folders and files established for attorney review. Defendants knew or had reason to know that these folders and files were not intended for them and that they did not have permission to access such files, which clearly were for review by the City's attorneys.

31. The records and/or emails in question include, but are not limited to, the following Dropbox folders and files containing PST files for attorney review identified to date:

"ACUSA_PRR.zip"

"council_20180430.zip"
"HL_PRR"
"JF_PRR_2"
"JF_PRR20181012"
"pr1919 - Josh Ferguson" (the Subject File)
"PRR_19-134_data@thehourlystruggle.com"
"PR19-171VD_1_2.zip"
"PPR_Cox.zip"
"PRR_JF_20181002"
"PRRS01082019.zip"
"PRRS01092019.zip"
"PRRS01092019_all.zip"
"PRRS01152019_JF.zip"
"PRRS02042019_VD.zip"
"PRRS02042019_VD_2.zip"
"Tiger_Signal_PRR.zip"

32. Upon information and belief, the privileged and confidential emails and/or records belonging to the City of Fullerton continue to be improperly, unlawfully, and wrongfully held by Defendants even after receiving notice of such unlawful possession and written demand that they return the materials to the Plaintiff.

33. Defendants continue to improperly, unlawfully, wrongfully and without authorization, post and publish the privileged and confidential City documents and information that are not subject to public disclosure under various privileges and exemptions to production under the Public Records Act.

34. The City has been harmed by the Defendants' conduct and has suffered damages in excess of $5,000, including but not limited to the following: (1) the continuing costs connected with the investigation of the source, nature and scope of the theft of the City's confidential and privileged records; and (2) the continuing costs of pursuing this action against the Defendants to prevent further publication of privileged and confidential records and information taken from the City's Dropbox account without authorization and to recover the records taken. The City anticipates will also face the costs of notifying each person whose confidential information has been improperly and illegally accessed by the Defendants, in violation of their right to privacy, and may also face the following future damages: (1) the costs of defending any data breach claims brought by any person whose confidential information was improperly and illegally accessed by the Defendants; and (2) the costs of defending any claims from current and former employees

stemming from the unauthorized release and/or publication of their confidential information.

35. In addition, as a result of the Defendants' actions, the Defendants' conduct has caused City employees and officials to suffer injury and damage due to the invasion of their privacy, in violation of HIPAA and other applicable federal and state laws as well as damage to their reputation stemming from the Defendants' false allegations published on the Blog based on the illegally obtained documents and materials.

36. Plaintiff is informed and believes, and based thereon alleges, that Defendants acted with malice, oppression and/or fraud, with a conscious disregard for the rights of the City's employees, former employees and other third parties whose private data and information Defendants stole and published in a public forum.

37. Accordingly, punitive damages should be awarded against Defendants in an amount sufficient to punish and deter them (and other such persons engaged in the conspiracy) from committing such wrongful and malicious acts in the future.

38. Defendants' conduct was a substantial factor in causing the City's harm.

SECOND CAUSE OF ACTION

Federal Computer Fraud and Abuse Act (CFAA) - 18 U.S.C. § 1030 et seq.

(Against All Defendants)

39. Plaintiff incorporates herein by reference each and all of the allegations in the preceding paragraphs of this Complaint as though fully set forth herein.

40. Defendants have willfully violated the Computer Fraud and Abuse Act, 18 U.S.C. § 1030(a)(2)(C), by intentionally accessing the City's Dropbox account, which was used for interstate commerce and communication, without or in excess of the City's authorization.

41. On information and belief, after gaining unauthorized access to the City's Dropbox account, Defendants downloaded privileged and confidential materials intended for review by the City's attorneys and never produced to the Defendants, without the City's authority. This information included the records and emails contained in the Dropbox folders and files identified at Paragraph 32 above, among other yet to be identified additional folders and files.

42. Upon information and belief, the emails and records belonging to the City of

Fullerton continue to be improperly, unlawfully and wrongfully held and used by the Defendants.

43. Defendants continue to improperly, unlawfully, wrongfully and without authorization, post and publish the privileged and confidential City documents that are not subject to public disclosure under various privileges and exemptions under the Public Records Act.

44. The City has been harmed by the Defendants' conduct and has suffered damages in excess of $5,000, including but not limited to the following: (1) the continuing costs connected with the investigation of the source, nature and scope of the theft of the City's confidential and privileged records; and (2) the continuing costs of pursuing this action against the Defendants to prevent further publication of privileged and confidential records and information taken from the City's Dropbox account without authorization and to recover the records taken. The City anticipates will also face the costs of notifying each person whose confidential information has been improperly and illegally accessed by the Defendants, in violation of their right to privacy, and may also face the following future damages: (1) the costs of defending any data breach claims brought by any person whose confidential information was improperly and illegally accessed by the Defendants; and (2) the costs of defending any claims from current and former employees stemming from the unauthorized release and/or publication of their confidential information.

45. In addition, as a result of the Defendants' actions, the Defendants' conduct has caused City employees and officials to suffer injury and damages due to the invasion of their privacy, in violation of HIPAA and other applicable federal and state laws as well as damage to their reputation stemming from the Defendants' false allegations published on the Blog based on the illegally obtained documents and materials.

46. Defendants' conduct was a substantial factor in causing the City's harm.

47. Pursuant to 18 U.S.C. § 1030(g), Plaintiff is entitled to injunctive relief, compensatory damages, and other equitable relief.

48. Plaintiff has suffered irreparable and incalculable harm and injuries resulting from Defendants' conduct, which harm will continue unless Defendants are enjoined from further unauthorized use and publication of Plaintiff's privileged and confidential records. Plaintiff has no adequate remedy at law.

THIRD CAUSE OF ACTION

VIOLATION OF CAL. GOV'T CODE § 6204 et seq.

(Against All Defendants)

49. Plaintiff incorporates herein by reference each and all of the allegations in the preceding paragraphs of this Complaint as though fully set forth herein.

50. Plaintiff has reasonable grounds to believe that records and emails, including privileged and confidential records and emails, belonging to the City of Fullerton are in the possession of Defendants, who are not authorized by law to possess such records and/or emails.

51. The records in question consist of various Dropbox folders and files containing PST files gathered for attorney review, which in turn included privileged and confidential emails and attachments, and which include those Dropbox folders and files identified at Paragraph 32 above as well as other additional yet to be identified folders and files.

52. On July 11, 2019, Plaintiff issued a written notice to Defendants pursuant to California Government Code § 6204.2, *et seq*. demanding that they: (a) return the aforementioned records to the City or (2) respond in writing explaining why the records do not belong to the City. The written notice further advised the Defendants that the City would take legal action to recover the records if Defendants failed to respond in writing within 20 days. (See Exhibit A).

53. Plaintiff City of Fullerton is the rightful owner of the emails and/or records in question and Plaintiff is therefore entitled to the sole possession of the property.

54. Defendants improperly, unlawfully, and/or wrongfully took possession and/or came into possession of the emails and/or records through the improper access of the Dropbox account established by the City of Fullerton.

55. Pursuant to California Government Code § 6204.2(d), Plaintiff asks that the Court enter an order that Defendants surrender the records at issue (as identified at Paragraph 32) to the City, pending the Court's decision on the Plaintiff's petition. Such order is necessary to protect the City's privileged and confidential records from "destruction, alteration, transfer, conveyance, or alienation by the Defendants"

FOURTH CAUSE OF ACTION

Conversion

(Against All Defendants)

56. The City incorporates herein by reference each and all of the allegations in the preceding paragraphs of this Complaint as though fully set forth here.

57. The City owned privileged and confidential data stored in its private Dropbox account, including Dropbox folders and files containing privileged and confidential emails and records containing material subject to the attorney-client privilege, third parties' right to privacy and other applicable privileges and exemptions under the Public Records Act. Such data is the exclusive property of the City, and the City has an exclusive right to the possession of such property.

58. Defendants substantially interfered with the City's property by knowingly, intentionally, willfully, and maliciously accessing, copying, downloading, and taking possession of said property; by distributing and publishing said property; and by refusing to return the said property after the City demanded its return.

59. The City at no time consented, expressly or impliedly, to any copying, downloading, removal, retention, publication and/or distribution of said property.

60. The City has been harmed by the Defendants' conduct and has incurred, and is continuing to incur, damages and losses due to the illegal and wrongful conduct of the Defendants.

61. Plaintiff is informed and believes, and based thereon alleges, that Defendants acted with malice, oppression and/or fraud, with a conscious disregard for the rights of the City's employees, former employees and other third parties whose private data and information Defendants stole and published in a public forum.

62. Accordingly, punitive damages should be awarded against Defendants in an amount sufficient to punish and deter them (and other such persons engaged in the conspiracy) from committing such wrongful and malicious acts in the future.

63. Defendants' conduct was a substantial factor in causing the City's harm.

FIFTH CAUSE OF ACTION

TRESPASS TO CHATTELS

(Against All Defendants)

64. Plaintiff incorporates herein by reference each and all of the allegations in the preceding paragraphs of this Complaint as though fully set forth here.

65. The City owned confidential data stored in its private Dropbox account, including confidential emails and records containing information subject to third parties' right to privacy. Such data is the exclusive property of the City, and the City has an exclusive right to the possession of such property.

66. Defendants substantially interfered with the City's property by knowingly, intentionally, willfully, and maliciously accessing, copying, downloading, and taking possession of said property; by distributing and publishing said property; and by refusing to return said property after the City demanded its return.

67. The City at no time consented, expressly or impliedly, to any copying, downloading, removal, retention, and/or distribution of said property.

68. The City has been harmed by the Defendants' conduct and has incurred, and is continuing to incur, damages and losses due to the illegal and wrongful conduct of the Defendants.

69. Defendants' conduct was a substantial factor in causing the City's harm.

SIXTH CAUSE OF ACTION

CONSPIRACY

(Against All Defendants)

70. Plaintiff incorporates herein by reference each and all of the allegations in the preceding paragraphs of this Complaint as though fully set forth here.

71. Plaintiff is informed and thereon alleges that sometime between December 28, 2017 and June 21,2019, Defendants did knowingly and willfully conspire and agree among themselves to: (1) knowingly access and/or download certain files and folders within the City's Dropbox account which they knew or had reason to know contained privileged and confidential information, without the City's permission; and (2) use and publish such privileged and confidential information

wrongfully and illegally obtained from the City's Dropbox account on The Blog.

72. Plaintiff had no reason to know of the Defendants' access and unauthorized download of such files and folders until they began publishing excerpts from documents taken from those files and folders on their Blog on or about June 13, 2019.

73. In furtherance of said conspiracy, the Defendants knowingly trespassed onto private folders and files within the City's Dropbox account which they had no permission to access or download, and substantially interfered with the City's property by knowingly, intentionally, willfully and maliciously accessing, copying, downloading and taking possession of said property and by refusing to return said property after the City demanded its return.

74. All of the actions of Defendants set forth in the preceding paragraphs incorporated herein were in violation of the Plaintiff's rights and committed in furtherance of the aforementioned conspiracies and agreements. Moreover, each of the Defendants lent aid and encouraged and knowingly ratified and adopted the acts of the other.

75. The City has been harmed by the Defendants' conduct and has incurred, and is continuing to incur, damages and losses due to the illegal and wrongful conduct of the Defendants.

76. Plaintiff is informed and believes, and based thereon alleges, that Defendants acted with malice, oppression and/or fraud, with a conscious disregard for the rights of the City's employees, former employees and other third parties whose private data and information Defendants stole and published in a public form. Accordingly, punitive damages should be awarded against Defendants in an amount sufficient to punish and deter them (and other such persons engaged in the conspiracy) from committing such wrongful and malicious acts in the future.

77. Defendants' conduct was a substantial factor in causing the City's harm.

PRAYER

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

1. For an order declaring that: Defendants, according to proof, (i) knowingly accessed the City's Dropbox account without the City's consent, and (ii) downloaded the City's

privileged and confidential documents contained therein and published information and excerpts from such documents, without the City's permission or authorization.

2. For an order enjoining and restraining the Defendants and their officers, agents, servants, employees, assigns, and those acting in active concert or participation with them as follows:

a. Restraining them from accessing the City's private computer networks, Dropbox account and/or servers without the City's authorization;

b. Restraining them from removing, copying, extracting or downloading any information or data from the City's computer networks, Dropbox account and/or servers without the City's authorization;

c. Restraining them from engaging in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of the City's computer networks, Dropbox account and/or servers;

d. Restraining them from selling, publishing, distributing or otherwise using any property or information obtained from the City's computer networks, Dropbox account and/or servers without the City's authorization;

e. Ordering Defendants to permanently delete any privileged or confidential City documents obtained from the City's Dropbox account without express authority from any and all Blogs, websites, social media posts and/or publications within their possession, custody or control; and

f. Ordering Defendants to permanently delete, under Court-appointed supervision, any City documents obtained without the City's express authority from any and all computers, servers and storage media (e.g., hard drives, flash drives, thumb drives, CD-ROMs, DVD-ROMs, etc.) under their possession, custody or control;

3. For an award of compensatory damages to the City in an amount to be determined, including but not limited to all damages and losses suffered by the City as a result of the unauthorized access, theft and subsequent publication of the City's privileged and confidential documents and the City's response thereto and remediation efforts related thereto;

4. For an award of any statutory damages to the Plaintiff available under applicable laws;

5. For an award of punitive damages to the Plaintiff available under applicable laws by way of punishment and in an amount sufficient to punish and set an example of Defendants;

6. For an award of reasonable costs and attorneys' fees available under applicable laws; and

7. For an award of such other relief as the Court deems proper, necessary or just.

Dated: October 24, 2019

JONES & MAYER

By: Kimberly Hall Barlow

Kimberly Hall Barlow
Bruce A. Lindsay
Monica Choi Arredondo
Attorneys for Defendant
CITY OF FULLERTON

EXHIBIT A

From:	Gregory P. Palmer
To:	team@fullertonsfuture.org; joshua@joshuaferguson.com
Cc:	KDomer@cityoffullerton.com; GretchenB@cityoffullerton.com; Richard D. Jones; Ivy M. Tsai
Subject:	Cease and Desist
Date:	Thursday, June 13, 2019 8:45:46 PM

Joshua Ferguson
Friends for Fullerton

Re: **Cease and Desist – City of Fullerton Police Department**

Dear Mr. Ferguson,

It has come to the attention of the City of Fullerton that you have recently published on your website documents which have clearly and undoubtedly been sourced from the confidential personnel files of several current and/or former Fullerton Police Officers. The State of California has statutorily recognized this right of confidentiality. (See Penal Code §§ 832.5, 832.7 and 832.8.) Any disclosure of such confidential records is strictly limited and must be authorized by a court order from a Superior Court judge. (See Evidence Code §§ 1043-1047; Pitchess v. Superior Court(1974) 11 Cal.3d 531 and its progeny.) Indeed, the Fullerton Police Department has an affirmative duty to resist attempts at unauthorized disclosure and the officers who are the subject of such records expect their right of privacy will be respected. (See Craig v. Municipal Court for the Inglewood Judicial District et al. (1979) 100 Cal.App.3d 69.) Finally, the improper disclosure of such records is prosecutable as a misdemeanor violation of law under Government Code section 1222 (See Attorney General Opinion, 82 Op. Att'y Gen. 246 (1999).) Any person facilitating the illegal disclosure of such documents in violation of the law may be prosecuted as either a principal in that crime or as an aider and abettor.

For all these reasons the City of Fullerton demands you immediately:

1. Remove these Confidential Documents from Your Blog within one hour of your receipt of this e-mailed cease and desist letter;

2. Refrain from posting any other Confidential Documents illegally obtained to Your Blog in the future:

3. That you immediately send to our office within 24 hours all Confidential Documents you and your employees have in your possession. You are also instructed not to make any copies of the Confidential Documents in any form (including but not limited to electronic, imaged, hard copies, etc.)

3. That you immediately delete all electronic copies of the Confidential Documents in your and your employees' possession.

Your failure to follow these instructions can result in legal action being taken against Friends for Fullerton's Future wherein the City will seek all necessary legal remedies.

We require your immediate compliance with this cease and desist letter. **Notify the undersigned of your compliance with the above within 24 hours of your receipt of this correspondence.**

Thank you for your prompt attention to this matter.

Gregory P. Palmer

City Prosecutor
City of Fullerton

Sent from my iPhone

J & M
JONES & MAYER

ATTORNEYS AT LAW

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July 11, 2019

Kelly Aviles, Esq.
LAW OFFICES OF KELLY AVILES
1502 Foothill Blvd, #103-140
La Verne, CA 91750

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Friends for Fullerton's Future Blog

Dear Ms. Aviles:

As legal counsel for the City of Fullerton, I write, pursuant to California Government Code section 6204 *et seq*., to notify you, as legal counsel to the owner(s) and/or operator(s) of the Friends for Fullerton's Future (FFFF) blog, that the City of Fullerton has reasonable grounds to believe that owner(s) and/or operator(s) of the FFFF blog are in unlawful possession of records belonging to the City of Fullerton. The records were taken and used by FFFF blog owner(s) and/or operator(s) without the City's authorization and fall within the definition of "record" under California Government Code Section 6204(a)(2), as well as the definition of "public records" under California Government Code § 6252(e), and are described as follows:

> Any and all records obtained from the City of Fullerton's Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson or any of FFFF's agents or associates through an emailed link, including, but not limited to, records contained in a folder named "pr1919 - Josh Ferguson."

Therefore, pursuant to Governmentt Code section 6204, within twenty (20) calendar days of receiving this notice, the owner(s) and/or operator(s) of the Friends for Fullerton's Future blog are hereby directed to either:

(1) Return the above-referenced records to the City of Fullerton, as previously requested; or

(2) Respond in writing and declare why the above-referenced records do not belong to the City of Fullerton. If the owner(s) and/or operator(s) of the Friends for Fullerton's Future blog do not deliver the above-described records, or do not respond adequately to this notice and its demand within the required time, we will immediately thereafter petition the Superior Court of Orange County for an order requiring the return of these records.

Cal. Gov't Code § 6204(b).

We further note that the FFFF blog has posted many of the confidential City documents after receipt of our office's June 13, 2019 cease-and-desist email. (A copy of that email is enclosed herein). Many, if not all, of the confidential City records posted to the FFFF blog are explicitly exempted from disclosure under the California Public Records Act, would not have been provided to Mr. Ferguson or FFFF agents or associates in response to a Public Records Act request, and could only have been obtained without the City's express authorization. Such records posted to the FFFF blog are confidential and exempt from disclosure pursuant to the following authorities:

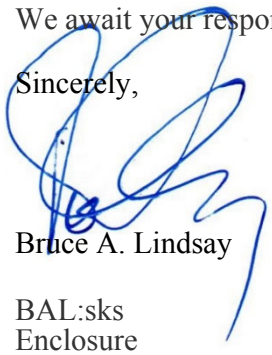
- "Preliminary drafts, notes, or interagency or intra-agency memoranda that are not retained by the public agency in the ordinary course of business, if the public interest in withholding those records clearly outweighs the public interest in disclosure." Cal. Gov't Code § 6254(a);
- "Records pertaining to pending litigation to which the public agency is a party, or to claims made pursuant to Division 3.6 (commencing with Section 810), until the pending litigation or claim has been finally adjudicated or otherwise settled." Cal. Gov't Code § 6254(b);
- "Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy." Cal. Gov't Code § 6254(c);
- Law enforcement investigative records. Cal. Gov't Code § 6254(f); and
- "Records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege." Cal. Gov't Code § 6254(k), which includes the following privileges:
    - Attorney-client privileged records. Cal. Evid. Code 950 et seq.; Roberts v. City of Palmdale, 5 Cal. 4th 363 (1993);
    - Attorney work product. Cal. Civ. Proc. Code § 2018.010 et seq.;
    - Peace officer personnel records. Cal. Penal Code § 832.7 et seq.; and
    - Confidential closed session information. Cal. Gov't Code § 54963.

FFFF's unauthorized access and misuse of the City's clearly privileged and exempted documents constitute a violation of California Penal Code section 502, which grants civil remedies (including compensatory damages, attorney's fees and potential punitive damages) to any persons or entities injured by any violations thereof. See Cal. Pen. Code § 502(c), (e).

As such, unless FFFF complies with the demands set forth in the City's June 13, 2019 cease and desist letter within 24 hours, the City will have no choice but to pursue all criminal and civil remedies available to it under the law.

We await your response.

Sincerely,



Bruce A. Lindsay

BAL:sks
Enclosure
cc: Gary S. Kranker, Esq.
Monica Choi Arredondo, Esq.
Ivy M. Tsai, Esq.

Exhibit B

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 4

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CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC
Judge Thomas A. Delaney

PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED; MEMORANDUM OF POINTS AND AUTHORITIES

[Filed Concurrently with: Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; Declaration of Kimberly Hall Barlow; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

***EX PARTE* APPLICATION**

PLEASE TAKE NOTICE that on Thursday, October 24, 2019, at 1:30 p.m. in the Civil Clerk's Office of the above-entitled Court located at 700 Civic Center Drive West, Santa Ana, California, Plaintiff City of Fullerton (the City) will appear to be assigned a case number, courtroom and hearing date and time for its Ex Parte Application for a Temporary Restraining Order and an Order to Show Cause Why a Preliminary Injunction Should Not Be Issued, pursuant to California Civil Procedure Code § 527, California Rules of Court 3.1150 and 3.2100-3.1207, and the procedures set forth in the Orange County Superior Court's website, at https://www.occourts.org/directory/civil/how-do-i/schedule-ex-parte-hearing.html.

The City will apply, on an *ex parte* basis, for (1) a temporary restraining order restraining certain activities of the Friends for Fullerton's Future Blog ("the Blog"), Joshua Ferguson, David Curlee and Christopher Tennyson (collectively "Defendants"), as well as all members, employees, writers, volunteers, agents, and all persons acting on their behalf or in concert with them, and (2) an order to show cause why a preliminary injunction should not be issued in this action.

The City seeks immediate ex parte relief because the City and its employees, former employees, and other third parties (whose private information is in the wrongful possession of the Defendants) (collectively hereafter referred to as "the Injured Parties") will suffer immediate and irreparable injury, loss and damage before the matter can be fully heard and adjudicated. Without the Court's immediate intervention, Defendants will continue to share, use and publish illegally obtained privileged and confidential information on their Friends for Fullerton's Future Blog (https://www.fullertonsfuture.org/contact/), which will cause additional and continuing injury, loss and damage to the City and its employees, former employees and agents whose information is being published by the Blog.

This application is based upon this notice; the attached memorandum of points and authorities; the Declarations of Matthew Strebe, Mea Klein, Steve Lee, Bruce A. Lindsay, and Kimberly Hall Barlow; and upon such further argument or evidence as may be presented at the hearing on this Application.

On October 24, 2019, before 10:00 a.m., consistent with the procedure set forth in the Court's

website at https://www.occourts.org/directory/civil/how-do-i/schedule-ex-parte-hearing.html, the City gave notice of its ex parte application via an Email sent to all known Email addresses associated with Defendants Friends for Fullerton's Future, Joshua Ferguson, David Curlee, and Christopher Tennyson, as well as to counsel for the Blog and Mr. Ferguson (Kelly Aviles). (Declaration of Kimberly Hall Barlow, at ¶ 3 & Exh. "A").

Dated: October 24, 2019

JONES & MAYER

By: Kimberly Hall Barlow

Kimberly Hall Barlow
Bruce A. Lindsay
Monica Choi Arredondo
Attorneys for Defendant
CITY OF FULLERTON

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MEMORANDUM AND POINTS OF AUTHORITIES

I. INTRODUCTION

Plaintiff is compelled to file this action and bring this *ex parte* application for a temporary restraining order ("TRO") to prevent the irreparable damage that will ensue if Defendants continue to publish privileged and confidential documents or emails belonging to the City of Fullerton (the City), which they obtained, took and downloaded from folders within the City's private Dropbox file sharing account without the City's authorization. Through such unauthorized access, taking, copying and use of the City's privileged and confidential data, Defendants violated the California Comprehensive Data Access and Fraud Act (CDFA), Cal. Pen. Code § 502 and the federal Computer Fraud and Abuse Act (CFAA), 18 U.S.C. § 1030.

As set forth below, ex parte relief is necessary because exigent circumstances exist in that Defendants are continuing to publish privileged and confidential documents and information wrongfully taken from the City's Dropbox account. Moreover, grounds exist for issuing a TRO against Defendants because the City can establish that (1) it will likely prevail on the merits of its claims against Defendants; and (2) the interim harm to it without the TRO outweighs any harm Defendants would suffer if the TRO is issued.

The City therefore requests that the Court temporarily restrain and enjoin Defendants and their agents, servants, employees, successors, assigns and all persons in active concert or participation with them from further using the City's privileged and confidential documents wrongfully obtained from the City's Dropbox account, as set forth in detail in the City's [Proposed] Order. In addition, the City requests that the Court order Defendants to immediately identify, locate, gather and segregate all copies of the privileged and confidential records identified at Appendix A to the City's [Proposed] Order.

II. FACTUAL BACKGROUND

On or about June 13, 2019, the City of Fullerton became aware that privileged and confidential documents had been published without its permission on the Friends for Fullerton's Future Blog (https://www.fullertonsfuture.org/) ("the Blog"). (Declaration of Bruce A. Lindsay ("Lindsay Dec."), ¶ 3 & Exh. A). The privileged and confidential information primarily relates to the City's internal investigations of law enforcement agents, terminations/resignations of employees and personnel

matters. (See Declaration of Matthew Strebe ("Strebe Dec."), ¶¶ 75-84).

On June 13, 2019, the City Prosecutor sent Joshua Ferguson and the Blog a cease and desist letter asking them to immediately remove the confidential documents posted to the Blog; refrain from posting any other confidential documents illegally obtained by the Blog; return all confidential documents illegally obtained by the Blog; and delete all electronic copies of any confidential documents illegally obtained by the Blog. (Lindsay Dec., ¶ 3 & Exh. "A").

On July 11, 2019, the City Attorney's office sent counsel for Mr. Ferguson and the Blog a follow-up cease and desist letter, specifically invoking Government Code section 6204 et seq. and Penal Code section 502(c), (e). (*Id.* ¶ 5 & Exh. "C"). The July 11, 2019 letter identified the records to be returned to the City as follows: "Any and all records obtained from the City of Fullerton's Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson or any of FFFF's agents or associates through an emailed link, including but not limited to records contained in a folder named 'pr1919 – Josh Ferguson.'" (*Id.*) The letter also asked the Blog to (1) return the documents contained in said Dropbox folder within 20 days; or (2) respond in writing explaining why the identified records do not belong to the City of Fullerton. Many of the documents contained in the referenced Dropbox folder were exempted from disclosure under the PRA. (*Id.*)

On July 31, 2019, Ms. Aviles responded. In her letter, she (1) denied the documents were unlawfully obtained; (2) claimed the description of the documents was unclear; and (3) claimed the information published was protected by the California Shield Law and the First Amendment-based Reporter's Privilege. (*Id.* ¶ 6 & Exh. "D").

After discovering the data breach by the Defendants, the City retained a forensic computer analyst to analyze materials related to Defendants' unauthorized access into the City's Dropbox file sharing account, including the Dropbox activity log reflecting the creation, deletion and modification of folders and files stored within the City's Dropbox account, as well as all accesses and downloads of those folders and files, among other materials. (Strebe Dec. ¶¶ 13-14). (See Strebe Dec., ¶¶ 20-22 and Klein Dec., ¶¶ 7, 10-11, 14-17, 20, 22 for background information regarding the Dropbox third-party file sharing service and the City's private Dropbox account).

During its investigation, the City of Fullerton determined the privileged and confidential City

documents accessed, downloaded, and posted by Defendants without the City's authorization originated from Dropbox folders containing PST files intended for attorney review before responding to various Public Records Act (PRA) requests made by various individuals, including Defendants Joshua Ferguson and David Curlee. (Strebe Dec., ¶ 69-74; Klein Dec. ¶ 10).[1]

The primary source from which the documents published on the Blog beginning on or about June 5, 2019 were extracted was a Dropbox zip file named "pr1919-Joshua Ferguson.zip" ("the Subject File"). The Subject File housed approximately 11,000+ emails plus attachments that were culled by a City Information Technology (IT) employee, with assistance from one of the City's attorneys, and were collected for attorney review to respond to Defendant Ferguson's Public Records Request (PRR) No. 19-19. (*Id.*, ¶ 69; Klein Dec., ¶¶ 17-21 & Exh. I). Based on the nature of the search terms requested (e.g., "Personnel Records," "Personnel Files" and "Police Records"), the 11,000+ records in the Subject File necessarily included private, confidential and privileged information about City staff that made legal review absolutely necessary. (Klein Dec., ¶¶ 17, 20).

Because of the immensity of the 11,000+ records returned from Ferguson's search terms, on May 24, 2019, the City Clerk asked him to further narrow his request, informing him that a review and redaction of the 11,000+ records would require over 100 hours of attorney time at a cost of roughly $20,000 to review records for responsiveness, applicability of exemptions and privileges, and to make necessary redactions. That same day, Ferguson responded that he would consult with his attorney about the City's request and would "get back" to the City regarding the matter. (Klein Dec., ¶ 21 & Exh. I). Because the City did not produce any records in response to Ferguson's PRR No. 19-19, and because the Subject File "pr1919-Joshua Ferguson.zip" contained PST files intended for attorney review, Ferguson should have known the Subject File contained in the City's Dropbox account was not intended for him. (*Id.*; Strebe Dec., ¶ 71-72).

Neither Ferguson nor his attorney followed up with the City regarding further narrowing PRR

[1] PST files are the native email storage format used by Microsoft Outlook email client and they can also be generated from a Microsoft Exchange email server by running search terms and other parameters such as date scope and user limitations against an email server. PST files are databases with their own folder hierarchy and may contain up to millions of email messages, attachments, and other data within a single computer file. PST files can only be opened within Outlook or using special software. An ordinary consumer would not know how to open a PST file. Double clicking on a PST file would not open it even with Outlook installed. (Strebe Dec., p. 20, at fn. 6.

No. 19-19 because Defendants had already been knowingly and systematically accessing and downloading folders and files from the City's Dropbox account without the City's knowledge or authorization since the end of 2017 -- not only the Subject File, but many others clearly intended for attorney review and not for production to third parties. In fact, Ferguson and his associates downloaded the Subject file on May 10, 2019. (Strebe Dec., ¶¶ 41-68). Defendants utilized methods to mask their identity and locations to cover up their unauthorized access into and downloads from the City's Dropbox account. Specifically, they used anonymizing Virtual Private Networks (VPNs) and The Onion Router (TOR) to mask their IP addresses and make it appear as if they were accessing and downloading folders and files through mostly foreign exit nodes. (*Id.*)

The subject of the City's TRO request are the Dropbox folders and zip files that contain privileged and confidential PST files downloaded by Defendants, and are listed at Exhibit A to the City's Proposed Order and at Paragraph 67 of the Strebe Declaration. (Strebe Dec., ¶ 67).

Despite the City's cease and desist letters, Defendants continue to publish the privileged and confidential information obtained through unauthorized access to its private Dropbox account, including whole documents and excerpts from documents that are clearly attorney-client privileged communications and/or private and confidential personnel-related records. (Strebe Dec., ¶¶ 75-84; Klein Dec., ¶ 24; RJN).

Due to the data breach issues addressed above, the City retained Glass Box Technology ("Glass Box") to audit, assess and consult on the security of the City's IT, including its local area networks (LANs), work stations, servers and data storage. (Declaration of Steve Lee, ¶ 2). Because Glass Box's initial assessment of the City's computer network and related systems identified certain areas of vulnerabilities to internal and external cyber attacks, data theft and hacking, it recommended that the City defer filing this lawsuit until such measures could be implemented, as the lawsuit would have signaled the City's vulnerabilities to would-be hackers. (*Id.* ¶¶ 5-7).

III. LEGAL ANALYSIS

A. *Ex Parte* Relief is Warranted Under the Circumstances

1. The City and its Employees, Former Employees and Third Parties Will Suffer Irreparable Harm If Ex Parte Relief Is Not Granted

Ex parte relief may be granted where the applicant can show "irreparable harm" or "immediate danger" absent the granting of such relief. Cal.R.Ct. 3.1202(c). Here, the Injured Parties whose privileged and confidential records and information are in the unauthorized possession of the Defendants face both "irreparable harm" and "immediate danger" if ex parte relief is not granted. Their privileged and confidential information have already been published on the Blog by the Defendants, and additional privileged and confidential information in Defendants' unlawful possession may continue to be published by the Defendants. The Blog has posted excerpts of numerous privileged and confidential documents unlawfully obtained from the City's Dropbox file sharing account from June 11, 2019 to September 17, 2019. (Strebe Dec., at ¶¶ 75-84, for examples of Blog posts reflecting excerpts from privileged and confidential City documents, which included privileged attorney-client communications, a *draft* settlement agreement and records pertaining to confidential personnel matters).[2] Most or all of the documents posted by Defendants are exempted from disclosure under the PRA. *See, e.g.*, Cal. Gov't Code § 6254(a) (preliminary drafts, notes, or interagency or intra-agency memoranda not retained by the public agency in the ordinary course of business); Cal. Gov't Code § 6254(c) (personnel, medical or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy); Cal. Gov't Code § 6254(f) (law enforcement investigative records); Cal. Gov't Code § 6254(k) (records exempted from disclosure pursuant to federal and state law provisions, such as the attorney-client privilege, attorney work product doctrine, peace officer personnel records, etc.).

Defendants have refused to return the privileged and confidential documents requested by the City; Defendants are free to continue posting the unlawfully obtained documents at any time. As such, Injured Parties continue to face the imminent threat of public disclosure of their privileged and private

[2] The California Supreme Court has held that the attorney-client privilege applies to governmental bodies just as it does to private citizens. *See Roberts v. City of Palmdale*, 5 Cal.4th 363, 371 (1993) ("[P]ublic agencies face the same hard realities as other civil litigants."). "[T]he privilege applies not only to communications made in anticipation of litigation, but also to legal advice when no litigation is threatened." *Id.* at 371.

information. Mere monetary damages awarded after final resolution of this action will not adequately compensate the Injured Parties. (Lindsay Dec., ¶¶ 6, 8-9 & Exh. D).

2. The Procedural Requirements for Ex Parte Applications under California Rules of Court Have Been Met

As set forth more fully in the attached Declaration of Kimberly Hall Barlow, consistent with the guidelines of California Rule of Court 3.1202 and 3.1203, the City gave written notice of its Ex Parte Application via email to all parties, including counsel for Defendants Friends for Fullerton's Future and Joshua Ferguson, as well as to all Email addresses known to be associated with Defendants. (See Declaration of Kimberly Hall Barlow, ¶¶ 2-3 & Exh. A thereto).

Extraordinary circumstances justify the shortened notice provided to Defendants, consistent with Cal.R.Ct. 3.1204(c) and the Court's procedure for filing ex parte application with the initial filing of the Complaint. (See https://www.occourts.org/directory/civil/how-do-i/schedule-ex-parte-hearing.html). Additional notice to Defendants would increase the risk of Defendants publishing more privileged and confidential records in violation of Injured Parties' rights. Defendants have continually published excerpts and information from the confidential records in violation of laws, as well as the Injured Parties' right to privacy. (See Lindsay Dec., ¶ 9; Strebe Dec., ¶¶ 75-84).

Indeed, on October 10, 2019, Defendant Ferguson filed a Petition for Writ of Mandate against the City (Case No. 30-2019-01103679-CU-WM –CJC), attaching additional privileged and exempted records to the Writ, including a copy of a *draft* settlement agreement the City would not ordinarily produce in response to a PRA request and would not have knowingly produced to Ferguson. (Klein Dec., ¶ 24; Request for Judicial Notice ("RJN")).

B. The Court Should Issue a Temporary Restraining Order Against the Defendants

A TRO may issue when "[i]t appears from the facts shown by affidavits or by the verified complaint that great or irreparable injury will result to the applicant before the matter can be heard on notice . . . ." Cal. Civ. Proc. Code § 527(c)(1). The Court should grant the TRO where (1) Plaintiff will likely prevail on the merits at trial, and (2) the interim harm to the Plaintiff without the TRO outweighs the likely harm to the defendant if the order is issued. *Church of Christ in Hollywood v. Super. Ct.*, 99 Cal.App.4th 1244, 1251 (2002). These two factors balance each other out, such that "[t]he more likely

it is that plaintiffs will ultimately prevail, the less severe must be the harm that they allege will occur if the injunction does not issue." *Right Site Coalition v. L.A. Unif. Sch. Dist.*, 160 Cal.App.4th 336, 338-39 (2008). As a result, "if the party seeking the injunction can make a sufficiently strong showing of likelihood of success on the merits" or "that the balance of harms tips in [the party's] favor," the trial court has discretion to issue the injunction. *Common Cause v. Bd. of Supervisors*, 49 Cal.3d 432, 441-42 (1989).

The issuance of a TRO does not determine the merits. All that is determined is whether the TRO is necessary to maintain the status quo pending the noticed hearing on the application for preliminary injunction. *Landmark Holding Grp. v. Super. Ct.*, 193 Cal.App.3d 525, 528 (1987). The Court should grant a TRO in this action because: (1) Plaintiff is likely to succeed on the merits of its claims; and (2) the likely harm the City and other Injured Parties will continue to suffer if a TRO is not granted outweighs any potential harm to Defendants.

1. The City of Fullerton is Likely to Prevail Against the Defendants

Because the information belonging to the City was accessed improperly and without authorization, Plaintiffs are likely to prevail on the merits in this action. The City's first through fifth causes of action are all premised on trespass-type statutes and/or theories of liability. The evidence establishes that Defendants (1) accessed folders within the City's Dropbox account containing privileged and confidential documents intended for the City's attorneys' review, without or in excess of authority, and/or (2) conspired to do so. (Strebe Dec.). As the City is likely to prevail on one of its causes of action, sufficient grounds for granting the requested TRO exists. *See eBay, Inc. v. Bidder's Edge, Inc.*, 100 F.Supp.2d 1058, 1069 (N.D. Cal.2000) (applying California law).

a) Cal. Pen. Code § 502 (CDAFA) and 18 U.S.C. § 1310 (CFAA)

California Penal Code section 502, the Comprehensive Computer Data Access and Fraud Act (CDAFA), allows the owner of a "computer, computer system, computer network, computer program, or data who suffers damage or loss by reason of a violation" of any provision of section 502(c) of the statute to bring a private civil action against the violators. Cal. Pen. Code § 502(e)(1). One is liable for violating CDAFA by "[k]nowingly accesses and without permission *takes, copies, or makes use of* any data from a computer, computer system, or computer network, or takes or copies any supporting

documentation, whether existing or residing internal or external to a computer, computer system, or computer network." Cal. Pen. Code § 502(c)(2) (emphasis added).

Similarly, the Federal Computer Fraud and Abuse Act (CFAA) allows a civil action to be brought against "[w]hoever intentionally accesses a computer without authorization or exceeds authorized access, and thereby obtains information from a protected computer," or "conspires to commit or attempts to commit" such an act, violates the Act. 18 U.S.C. § 1310(a)(2)(C), (b).

(1) Defendants Violated CDAFA and the CFAA by Knowingly Accessing Dropbox Folders and Files Not Produced to them

Penal Code § 502(c) does not require a plaintiff to establish "unauthorized access." It merely requires *knowing* access." *United States v. Christensen*, 828 F.3d 763, 789 (9th Cir. 2016) (emphasis added); *Gilbert v. City of Sunnyvale*, 130 Cal.App.4th 1264 (2005) (officer who "knowingly accessed" DMV record and without permission disclosed information violated CDAFA). What makes access unlawful under CDAFA is one without permission takes, copies, or makes use of computer data. Cal. Pen. Code § 502(c)(2). A plain reading of the statute demonstrates its focus on unauthorized taking or use of information. *See Christensen*, 828 F.3d at 789.

The term "knowingly accesses" within Penal Code section 502(c) includes "logging into a database *with a valid password* and subsequently taking, copying, or using the information in the database improperly." *Id.* (emphasis added); *see also Facebook, Inc. v. Power Ventures, Inc.*, 844 F.3d 1058 (9th Cir. 2015) ("knowing access" includes access through log-in credentials voluntarily provided by third parties); *Satmodo, LLC v. Whenever Communs., LLC*, 2017 U.S. Dist. LEXIS 203469, at *13-14 (S.D.Cal. Dec. 8, 2017) (allowing § 502(c)(5) claim based on access gained through using valid password, used to improperly produce invalid clicks on plaintiff's paid advertisements to increase defendant's revenues); *NovelPoster v. Javitch Canfield Grp.*, 140 F.Supp.3d 954, 967 (N.D.Cal.2014) (denying motion to dismiss section 502 claim against individual who "used technically-operable log-in information to access portions of a computer system which the individual knew he was not permitted to access"); *DocMagic, Inc. v. Ellie Mae, Inc.*, 745 F.Supp.2d 1119 (N.D.Cal. 2010) (defendant's repeated unauthorized access into plaintiff's servers using others' license keys and log-in credentials satisfied CFAA). Thus, even if Defendants can show they obtained links to the specific Dropbox folders

and files at issue from a City agent or a third party, CDAFA only requires "knowing access" and liability still attaches so long as Defendants took, copied and used the data without permission.

Similarly, the CFAA "provides two ways of committing the crime of improperly accessing a protected computer: (1) obtaining access without authorization; and (2) obtaining access with authorization but then using that access improperly." *Musacchio v. United States*, 136 S.Ct.709, 713 (2016); *Wec Carolina Energy Solutions LLC v. Miller*, 687 F.3d 199 (4th Cir. 2012).

Thus, Defendants' access into Dropbox folders not directly produced to them constituted knowing access under CDAFA, even if they can prove they obtained links and passwords to those folders from the City or a third party. *See, e.g.*, *Power Ventures, Inc.*, 844 F.3d 1058 (9th Cir. 2015). Moreover, assuming Defendants can establish they had authority to access the Dropbox folders containing the privileged PST files, they violated the CFAA by exceeding the scope of any such access by downloading the files without the City's permission. *See Musacchio*, 136 S.Ct.at 713.

(2) Defendants Violated CDAFA and the CFAA by Taking, Copying and Using Data Contained in Dropbox Folders and Files Not Produced to them

Once they gained unauthorized access into folders within the City's Dropbox account containing privileged and confidential PST files not produced to them, Defendants took, downloaded and copied thousands of documents from those privileged and confidential folders and files without permission. Defendants had reason to know the PST files were not intended for them since they were not produced directly to them and since the City did not produce PST files in response to their PRA requests. (See Strebe Dec., ¶¶ 69-74 & Exh. A; Klein Dec., ¶¶ 12, 16). Defendants thereafter used such privileged and confidential documents by publishing them on their Blog. (Strebe Dec., ¶¶ 75-84). By "tak[ing], cop[ying] and mak[ing] use of" the City's Dropbox folders and files containing privileged and confidential PST files not produced to them, without the City's permission, Defendants violated CDAFA. *See* Cal. Pen. Code § 502(c)(2); *see also DocMagic, Inc.*, 745 F.Supp.2d at 1151 ("Penal Code section 502 prohibits knowing access, followed by unauthorized (i.e., 'without permission') taking, copying, or use of data . . . .") (citation omitted). Defendants also violated the CFAA by "obtain[ing] . . . information from a[] protected computer," "without authorization." 18 U.S.C. § 1030(a)(2)(C).

(3) Defendants Violated CDAFA and CFAA by Causing the City to Sustain Damages Resulting from their Actions

In addition to "any other civil remedy available," CDAFA allows owner of the data who suffers damage or loss by reason of the violation to "bring a civil action against the violator for compensatory damages and injunctive relief or other equitable relief." Cal. Pen. Code § 502(e)(1). Recoverable compensatory damages includes "any expenditure reasonably and necessarily incurred by the owner or lessee to verify that a computer system, computer network, computer program, or data was or was not altered, damaged, or deleted by the access." *Id.* Similarly, the CFAA allows one who suffers damage or loss as a result of a violation to recover "compensatory damages and injunctive relief or other equitable relief" if the defendant's conduct results in an aggregate loss of "at least $5,000 in value" "during any 1-year period." *Id.* § 1030(g) (citing *id.* § (c)(4)(A)(i)(1)).

As a result of the Defendants' unlawful actions, the City has suffered recoverable damages well over $5,000, under Penal Code section 502(e) and 18 U.S.C. § 1030(g). Such damages include: (1) continuing costs connected with investigating the source, nature and scope of theft of the City's confidential and privileged records; and (2) costs of pursuing this action against Defendants to prevent further publication of privileged and confidential records taken from the City's Dropbox account without authorization and to recover the records taken. (Lindsay Dec., ¶ 7). The City also anticipates incurring costs associated with notifying each person whose confidential information was illegally accessed by Defendants, in violation of their right to privacy, and may also face future damages related to: (1) costs of defending data breach claims brought by person(s) whose confidential information was illegally accessed; and (2) costs of defending claims from others stemming from the unauthorized release and/or publication of their confidential information. (*Id.*); *see also Success Factors, Inc. v Softscape, Inc.* 544 F.Supp.2d 975 (N.D. Cal.2008) (plaintiff could meet $5,000 required for CFAA where it incurred costs investigating identity of offender and how offender accessed protected information). As such, based on the evidence to date, the City has demonstrated a probability of prevailing on the merits of its claims.

b) Cal. Gov't Code § 6204.2

California Government Code section 6204.2 allows a local agency to petition the court for an

order requiring the return of any records belonging to it from a defendant who has "receive[d] a written notice and demand" for the return of such records, where the defendant "does not respond to the notice and demand within the "required time, or does not adequately demonstrate that the record does not belong to the local agency." Cal. Gov't Code § 6204.2(b). Section 6204.2(d) also allows the Court to "issue any order necessary to protect the record from destruction, alteration, transfer, conveyance, or alienation by the person, organization, or institution in possession of the record, and may order the record to be surrendered into the custody of the local agency pending the court's decision on the petition." Cal. Gov't Code § 6204.2(d).

As established above, Defendants possess City's privileged and confidential records they obtained by unlawfully accessing, downloading and using folders within the City's Dropbox account to which they were not given lawful access. In response to the City's cease and desist correspondence, Defendants failed to explain how they acquired the privileged and confidential documents posted on their Blog, instead asserting defenses based on the California Shield Law and First Amendment rights. (Lindsay, ¶ 6 & Exh. D). The evidence presented shows Defendants downloaded and copied privileged PST files from multiple folders and zip files in the City's Dropbox account, without the City's permission. (Strebe Dec., ¶¶ 69-74 & Exh. A; Klein Dec. ¶¶ 12, 16). The City has shown likelihood of success on its Government Code § 6204.2 claim.

c) Trespass to Chattels

Trespass to chattels lies where an intentional interference with possession of personal property has proximately caused injury. *Thrifty-Tel v. Bezenek*, 46 Cal.App.4th 1559 (1996). Similar to the CDAFA and the CFAA, in order to prevail on a claim for trespass to chattels based on accessing a computer system, the plaintiff must establish: (1) defendant intentionally and without authorization interfered with plaintiff's possessory interest in the computer system; and (2) defendant's unauthorized use proximately resulted in damage to plaintiff. *See Thrifty-Tel*, 46 Cal.App.4th at 1566. The interference does not have to be substantial; any intermeddling with or use of another's personal property is sufficient to establish a cause of action for trespass to chattel. *See eBay, Inc.*, 100 F.Supp.2d at 1070-71 (80,000 to 100,0000 daily queries against eBay's systems held sufficient for finding of trespass to chattels; even though queries represented negligible load on eBay's systems; contrary

finding would bring eBay's computer systems to a halt through aggregate queries run by others). Defendants interfered with the City's possessory interest over its Dropbox folders containing confidential PST files intended for attorney review by downloading, copying, and using the information contained therein by publishing them on their Blog, all without the City's permission. (See Strebe Dec., ¶¶ 69-74 & Exh. A; Klein Dec., ¶¶ 12, 16). As a result of Defendants' actions, the City has been forced to incur costs of investigating the source, nature and scope of Defendants' theft of the City's confidential and privileged records and the pursuit of this action to prevent further publication of (and recover) the City's wrongfully taken records. (Lindsay Dec., ¶ 7). As such, the City has shown a likelihood of success on its trespass to chattels claim.

d) The Defendants' First Amendment Rights Do Not Confer upon them the Right to Obtain Records or Information through Illegal Means

Contrary to Defendants' suggestion, members of the media do not have an absolute First Amendment privilege to commit torts or violate criminal laws in the name of news gathering. *See, e.g., Dietemann v. Time, Inc.*, 449 F.2d 245, 249 (9th Cir. 1971) (undercover reporters' use of lies to enter private residence and hidden cameras and recording devices to record suspected "quack" doctor not protected under First Amendment). "The First Amendment has never been construed to accord newsmen immunity from torts or crimes committed during the course of newsgathering. *The First Amendment is not a license to trespass, to steal or to intrude by electronic means into the precincts of another's home or office*. It does not become such a license simply because the person subjected to intrusion is reasonably suspected of committing a crime. . . . [T]here is no First Amendment interest in protecting news media from calculated misdeeds." *Id.* at 249-50 (emphasis added) (citing *Time, Inc. v. Hill*, 385 U.S. 374, 389-90 (1967)).

California law is clear that persons engaging in news gathering are not permitted to violate applicable laws in the process. *See, e.g., Shulman v. Grp. W Prods., Inc.*, 18 Cal.4th 200, 239 (1998) (holding members of news media do not enjoy constitutional privilege to eavesdrop in violation of Penal § 632 "or otherwise to intrude tortiously on private places, conversations or information."); *Marin Indep. J. v. Muni. Ct.*, 12 Cal.App.4th 1712 (1993) (trial court's seizure of reporter's film did not violate First Amendment; photographs were obtained unlawfully, in deliberate violation of the trial court's

order barring photographs and videorecording of the criminal proceedings).

Each of the cases cited by Defendants' attorney in response to the City's July 31, 2019 cease and desist letter is inapposite because each involved situations where members of the media obtained the published confidential information through lawful means from a third party who perpetrated a tort or crime to obtain the information. (See Lindsay Dec., ¶ 6 & Exh. D).[3] *Ass'n for L.A. Dep. Sheriffs v. L.A. Times Commc'ns. LLC*, 239 Cal.App.4th 808, 811-12 (2015) is also inapposite for the same reason. In that case, the L.A. Times obtained confidential and private employment applications obtained by an employee rather than the reporter himself. *Id.*

Here, in contrast, Defendants themselves violated CDAFA and the CFAA and tortiously trespassed into City's Dropbox account by accessing, downloading and using PST files contained in folders not produced to them. (See Strebe Dec., ¶¶ 69-74 & Exh. A; Klein Dec., ¶¶ 12, 16).

2. The Harm Suffered by the City and Third Parties Affected by Defendants' Actions Outweigh Any Harm Defendants May Face

A TRO is warranted here because the interim harm to the City without the TRO outweighs the likely harm to Defendants if the order is issued. *See Church of Christ in Hollywood*, 99 Cal.App.4th at 1251. The City and all Injured Parties have suffered, and will continue to suffer, significant harm as a result of violation of their privacy rights. Many of the privileged emails contained in the PST files Defendants unlawfully downloaded concern police and personnel matters subject to heightened privacy concerns, given the nature of the search terms requested (e.g., "Police Records," "Personnel Files," and "Personnel Records."). In fact, the documents Defendants posted included attorney-client privileged communications, an excerpt from a privileged closed session memo, a privileged draft separation agreement, human resources disciplinary records, and a confidential insurance claim document, among others. (*See* Strebe Dec., ¶¶ 75-84). The City has the same interest as any citizen in protecting

[3] *See Bartnicki v. Hopper*, 532 U.S. 514, 535 (2001) (First Amendment defense affirmed where radio show host did not illegally record the private conversation replayed on radio show); *Oklahoma Publishing Co. v. Dist. Ct.*, 430 U.S. 308, 309-11 (1977) (order enjoining news media from publishing name or photograph of 11 year old charged with murder in pending juvenile proceeding violated First Amendment where information was already public); *Smith v. Daily Mail Publ. Co.*, 443 U.S. 97, 104 (1979) (First Amendment violated where newspaper indicted for publishing name of juvenile lawfully obtained from eyewitnesses and monitoring of police band radio frequency); *Florida Star v. B.J.F.*, 491 U.S. 524, 533-537, 546 (1989) (First Amendment violated where damages imposed on paper for publishing name of assault victim lawfully obtained from Police Department's website); *Braun v. Chronicle Publishing Co.*, 52 Cal.App.4th 1036, 1050 (1997) (case did not involve improperly or illegally obtained documents or information).

communications with its attorneys. *City of Palmdale*, 5 Cal.4th at 371. Defendants were well aware the documents they were posting were attorney-client privileged based on their knowledge of the City's attorneys from their monitoring of City business.

Given Defendants' continued publication of privileged and confidential City documents, only injunctive relief can address the harm the City faces from Defendants' conduct. Mere money damages would not fairly compensate the City for its loss because Defendants' conduct is likely to continue. (In fact, Defendant Ferguson just recently attached privileged and confidential City documents obtained from the Dropbox folders containing privileged and confidential PST files he illegally downloaded to the Petition for Writ of Mandate he recently filed against the City on October 10, 2019. (See Klein Dec., ¶ 24; RJN).

In contrast, Defendants will suffer no harm by being enjoined from further illegal disclosures of privileged and confidential records and information they illegally took from the City, as they never had rights to access them in the first place. The City's requested TRO is narrowly tailored to preclude Defendants from using and publishing only materials they unlawfully obtained from the City's privileged and confidential PST files not directly produced to them. Defendants are free to continue publishing information they obtained through other legitimate means. *See, e.g.*, *Wolfson v. Lewis*, 924 F.Supp.1413, 1434-35 (E.D. Penn. 1996) (news reporters not irreparably harmed by injunction narrowly tailored to preclude their harassing, hounding, following, intruding, frightening, terrorizing or ambushing of plaintiff and his wife and children; such an injunction allowed them to continue using legal newsgathering means). As discussed above, Defendants' First Amendment freedoms do not outweigh the City's rights where they engaged in illegal or tortious conduct to obtain the information they seek to publish. (See supra, Part III.B.1.d., at pp. 12-13).

3. Injunctive Relief May Be Granted to Prevent the Disclosure of Confidential Materials

Injunctive relief may be issued to protect the right to privacy, such as the statutory confidentiality and privacy rights that adhere to police and other personnel records contained within the Dropbox folders and files accessed, taken and copied by Defendants without the City's permission. *See Robbins v. Super. Ct.*, 38 Cal.3d 199, 212-13 (1985). Injunctive relief is commonly ordered to prevent

disclosure of confidential documents or information that employees have improperly taken from their employers, for example. *See Ready Link Healthcare v. Cotton*, 126 Cal.App.4th 1006, 1014 (2005); *ABBA Rubber Co. v. Seaquist*, 235 Cal.App.3d 1, 8 (1991) (enjoining former employee from "divulging, making known or making any use of confidential information from employer). As such, it is appropriate for the Court to enjoin Defendants from further disclosing or publishing the documents at issue.

C. The Court Should Enter An Order to Show Cause Why a Preliminary Injunction Should Not Be Issued

The City requests a full hearing on a Preliminary Injunction for the same reasons and under the same authorities as set forth in support of the requested TRO, and requests that an Order to Show Cause be issued consistent with California Rule of Court 3.1150(a). The City requests a full hearing on a Preliminary Injunction for the same reasons and under the same authorities as set forth in support of the TRO, and requests that an Order to Show Cause be issued along with the TRO.

As with a Temporary Restraining Order, when granting a preliminary injunction the Court weighs two interrelated factors: (1) the likelihood the moving party will prevail on the merits; and (2) the relative interim harm to the parties from the issuance or non-issuance of the injunction. *Whyte v. Shlage Lock Co.* (2002) 101 Cal.App.4th 1443, 1449. As shown in the Declarations submitted herewith, and as will be shown at the hearing on a preliminary injunction, sufficient grounds exist for both the TRO and a preliminary injunction.

IV. CONCLUSION

For the foregoing reasons, the City respectfully requests that the Court grant this *ex parte* application and enter the requested temporary restraining order and schedule an order to show cause why a preliminary injunction should not be issued in this action.

Dated: October 24, 2019

JONES & MAYER

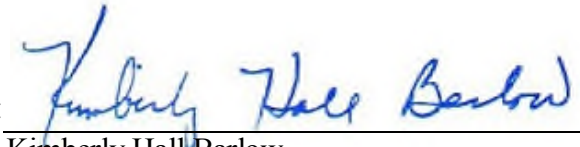
By: 

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Exhibit C

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

Judge Thomas A. Delaney

CITY OF FULLERTON,

Petitioner,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, and DOES 1 to 50, Inclusive,

Respondents.

Case No. 30-2019-01107063-CU-NP-CJC

DECLARATION OF MATTHEW STREBE IN SUPPORT OF CITY OF FULLERTON'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed concurrently with: Memorandum of Points and Authorities; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; Declaration of Kimberly Hall Barlow; Request for Judicial Notice; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

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DECLARATION OF MATTHEW STREBE

I. INTRODUCTION

I, MATTHEW STREBE, hereby declare as follows:

1. I am an adult over the age of eighteen and I have personal knowledge of the facts contained in this declaration. I could testify to these facts in a court of law if called upon to do so.

2. I make this declaration in support of Plaintiff City of Fullerton's (City) Ex Parte Application for a Temporary Restraining Order and Order to Show Cause Why a Preliminary Junction Should Not Be Issued. Based on my forensic analysis of the Activity Log for the City's Dropbox account, as well as other corroborating evidence set forth below, I have reached the conclusion that Joshua Ferguson and his accomplices (including other authors associated with the Friends for Fullerton's Future Blog (hereinafter, "The Blog"):

a. knowingly accessed multiple folders and files within the City's Dropbox account containing materials they knew to be privileged and confidential, and

b. improperly used excerpts and information from those privileged and confidential materials, without the City's permission, by posting and publishing them on The Blog.

II. QUALIFICATIONS AND BACKGROUND

3. I am the Chief Executive Officer of Connetic, an Information Technology (IT) Managed Services Provider. I founded Connetic in 1996 to provide good-practice IT processes that were previously available only to large companies in order to provide such processes to small and medium-sized enterprises. Connetic manages thousands of users across heterogeneous environments for its customers throughout the United States, Europe and Asia. These services consist of routine "Helpdesk," On-site Support, Network Operations, Security Operations, IT Implementation Project Management and Strategic Decision Support.

4. Based on my experience and under my direction, Connetic developed a computerized network security audit practice that was then called "ethical hacking" and which has evolved now into the practice known as penetration testing and vulnerability scanning. This process

is designed to attempt to attack or hack a customer's network from the internet to expose any vulnerabilities their system may have.

5. Connetic regularly runs annual security audits for mid-sized companies under my direction to assist them in remaining secure from both external (i.e., third-party) and internal (i.e., employees) cybersecurity threats. Having developed this security audit practice over the course of twenty years, I have a deep insight into the hacking methods and the defenses that are necessary to secure target businesses. Our security audits include: security configuration audit and assessment; vulnerability scanning; penetration testing; post-breach forensic analysis and remediation, if needed; proper configuration reporting; and security configuration remediation or consultation.

6. Connetic also performs forensic data breach analysis and response consultation. I personally have performed emergency data breach and cybersecurity incident responses, developed data breach reports and performed remediation on over 20 occasions.

7. I developed the risk model used to perform IT security risk assessments which provides an actuarial analysis of a company's risk of network vulnerability and exposure based on their size, industry, exposure to customer information and exposure to regulatory requirements.

8. I also routinely provide consultation for software developers in the development of secure code for various purposes, including cryptography software, secure network protocols, Internet-of-Things ("IoT") devices and cybersecurity devices. I currently sit on the Board of Advisors for a cybersecurity startup (UBIQ Security) and consult Xiltrix on its IoT and cloud security.

9. I began my career in networking in 1989 while serving in the U.S. Navy. I was educated and trained in the practice of Electronic Warfare dealing with the reception, detection, localization and jamming of enemy radars. It was during this time that I designed, installed and administered the first modern computer network on the warship USS Worden CG-18.

10. In addition to my practical work in the field of network management services and cybersecurity, I have written eighteen books that have sold millions of copies worldwide in over thirty languages, covering IT certification, computer and network security, cybersecurity and hacking, advanced systems administration and the business of network consulting.

11. I am the inventor and software architect of the "No Transmit" protocol ("NOTX") which is a patented broad-spectrum cyber-defense technology specifically designed to respect and enable network neutrality by creating a secure mechanism for end-users to request that internet service providers ("ISPs") perform firewalling on their behalf. This technology is presently licensed to a major U.S. defense contractor.

12. In my capacity as a forensic computer analyst, I have been retained as an expert witness and consultant in cases involving significant data breaches that occurred to the networks of Anthem, Premera, Facebook and Equifax, as well as other companies in the defense, financial and retail industries. I was qualified as an expert and testified in the field of forensic computer analysis in the Facebook data breach litigation, *Echavarria, et al. v. Facebook, Inc.*, Lead Case No. C 18-05982 WHA (N.D. Cal.). I also provided deposition testimony and expert reports that were accepted by the courts in the following cases, before they were settled: *In re: Anthem Inc. Data Breach Litig.*, Case No. 5:15--md--02617 (N.D. Cal.), and *In re Premera Blue Cross Customer Data Security Breach Litig.*, Case No. 3:15-md-02633 (D. Or.).

13. In the instant matter, I was requested by the City of Fullerton to determine: (a) what actions, if any, were taken by Mr. Joshua Ferguson, or anyone acting in concert with him, in accessing and downloading certain privileged and private City documents stored in the City's Dropbox account, without or beyond the scope of the City's authorization and (b) whether information posted on The Blog was obtained by Mr. Ferguson himself (or others participating with him) from the City's Dropbox account, without the authorization, permission or consent of the City.

14. As part of my investigation of this matter, I have reviewed the following materials:

a. The City's Dropbox (file sharing) account activity log showing information regarding files and folders stored in the account, including information regarding the creation, deletion and modification of folders and files stored on the account, as well as access and download of those folders and files;

b. Certain communications between City staff and Joshua Ferguson and/or The Hourly Struggle (a podcast talk show hosted by Mr. Ferguson), regarding

Mr. Ferguson's Public Records Act (PRA) requests;

c. Certain communications between City staff and David Curlee, regarding Mr. Curlee's PRA requests. (Mr. Curlee also writes for The Blog and appears to cooperate with Mr. Ferguson in obtaining information from the City through PRA requests);

d. The Friends for Fullerton's Future Blog;

e. Common Internet databases used to research Internet Provider (IP) addresses appearing in the City's Dropbox account activity logs;

f. Certain zip files from the City's Dropbox account containing PST files; and

g. The Declaration of Mea Klein, regarding the use of the City of Fullerton's Dropbox account and PRA requests made by Mr. Ferguson and his accomplices.

III. TECHNOLOGY OVERVIEW

A. Identity and Access Management (Authentication)

15. Identity and Access Management, also routinely referred to as Authentication and Access Control, is the set of techniques used in the computer industry to control who may access data on computing systems.

16. Most computer users are familiar with the common Username and Password authentication method and may falsely assume that it constitutes all forms of authentication. It does not. In the last decade, actual access control mechanisms became available to control access within a computer or on a network such as the Internet based on various other mechanisms, so that some files could be accessed while others remained protected from use or disclosure. For example, access control may now be based on the use of a particular accessing computer and the sharing of an exact web link provided by email (referred to as an invitation). Multiple factors of authentication exist and can be chosen to fit the user's computer network system.

17. It is clear from the history of access management that the mechanisms used are both constrained by the technology available and by the particular purpose to which an information system is put. Just as the commons have public spaces, private spaces, and invitation-only spaces,

so does the commons of the Internet. Authorization by invitation remains the standard definition.

18. The mechanism of access enforcement is not relevant to the concept of authorization. Authorization retains its basis in obtaining permission from relevant authorities (such as the system or data custodians) irrespective of any access control mechanism which may or may not be in place. This principle is enforced throughout the law: An unlocked door is not a defense to burglary.

19. Similarly, a homeowner's invitation into a person's living room does not constitute authorization to rifle through their bedroom drawers searching for valuables, irrespective of whether the bedroom door was locked. An invitation into a private home, for an event at a particular time period does not constitute an ongoing invitation to enter the home forevermore.

B. <u>Dropbox</u>

20. Dropbox is a third-party file sharing service. The service operates through a convenient "web link sharing" methodology, where the sharer uploads a file to Dropbox, and the Dropbox service provides a unique "link" back, which can be shared with anyone via email. This mechanism constitutes a specific invitation to access a specific file or folder of files.

21. The receiver can then click the link to initiate a web download of the contents of the file. Importantly, permission to access the file is provided by the sharing of the link.

22. Access to a shared Dropbox account link may occur whether a person has logged into Dropbox or not. If the requester has a Dropbox account and has accessed it from the computer they are working on, Dropbox will log them in automatically and will thereby have information about the user's email address when the user clicks on a Dropbox account link. If the user/requester logs out, or does not have a Dropbox account, or takes other measures designed to anonymize their identity, Dropbox will provide the link to the requested file without requiring the user/requester to log in. Dropbox assumes that anonymous users have authorization based on knowledge of the unique and unguessable link value contained in the original email invitation. Importantly, Dropbox links to files and folders cannot be guessed: The only way to initiate access is to obtain a link from someone who has authorized access. Once a user has initiated access to a Dropbox folder, various access control rights may be configured to control what files are exposed to anonymous users. In

the case of anonymous access, Dropbox will log the user's access with an empty username field value. However, Dropbox maintains activity logs that enable a forensic computer analyst to determine the access method and route into a file, even if the user is attempting to conceal their identity. Each entry in a Dropbox account activity log shows the following:

a. Date and time: The exact date and time that an action took place;

b. Member: The member that initiated the action;

c. Activity: Details of the event itself; and

d. Location: The location from which the user initiated the action, and the Internet protocol (IP) address of the machine they were on.

C. <u>Anonymizing Virtual Private Networks (VPNs)</u>

23. VPNs encapsulate and encrypt IP addresses in such a way as to create a direct, encrypted path between two networks. They work by encapsulating any Internet traffic into an existing connection between VPN endpoints and encrypting it. The path between those two endpoints is then obscured to the traffic within the encapsulated tunnel.

24. VPNs are used for many purposes, but when accessing a public service such as Dropbox, they are used primarily to obscure the actual originating IP address and to anonymize the user's connection. This obscurity occurs because the VPN traffic appears to originate from the far end of the VPN tunnel (the exit node), and its actual origin is obscured by the VPN provider service.

25. Hackers, cybersecurity analysts and even some journalists routinely use VPNs in order to obscure their source address in activity log files when there is a strong possibility of an investigation involving the site they are accessing. In each of these cases, whether legitimate or illegitimate, the use of anonymizing VPNs is an intentional act knowingly seeking to cover one's tracks while accessing certain websites or networks.

26. VPNs are commercial services operated by commercial businesses, and as such, governments can subpoena records and logs to trace VPN connections. For this reason, they are generally not used for outright illegal activities, but are used to obscure identity from entities that are not law enforcement, such as streaming services, spouses, employers, etc.

27. Most VPN providers who exist specifically to anonymize VPN connections operate

multiple points-of-presence ("POPs") in many countries and randomly choose (or allow the user to choose) the exit POP for their VPN customers with the specific goal of making their access difficult to trace.

28. For instance, as of May 2019, the VPN provider PureVPN, ran 2,058 remote VPN servers in over 140 countries worldwide, with the largest number of servers in the United States (98 servers), Germany (67 servers), United Kingdom (56 servers), Australia (26 servers), Canada (20 servers), Netherlands (15 servers), and France (14 servers).[1]

D. The Onion Router (TOR)

29. TOR is a distributed network of anonymizing proxy web relays developed originally by the U.S. Government for the purpose of hiding the identity of intelligence assets from foreign governments on the Internet. It has been widely adopted since then by cybercriminals, activists, journalists, hackers, and cybersecurity analysts to hide their location and identity information.

30. TOR is used specifically (and only) for obscuring the originating IP address of a web browser. Unlike VPNs, which can be used to obscure any kind of IP traffic, TOR is specific to web traffic and must be used with a specialty web browser specifically designed for TOR. Although experts can force various types of traffic over TOR by hiding it within web traffic, this use case is exceptionally rare and not trivially accomplishable by non-experts.

31. TOR's use is limited mostly to hackers and those with an interest in remaining completely anonymous on the Internet. There are no known methods to reveal the origin of a TOR browsing session, and as such it is immune to government subpoena power and law enforcement generally. As such, most access to the "dark web" is performed via TOR, and TOR carries most of the illicit traffic on the web. TOR can also be used by journalists, spies, and intelligence agencies to transfer information without revealing its source.

IV. FORENSIC ANALYSIS

32. I am informed that the City of Fullerton used a Dropbox account from June 15, 2016 to June 21, 2019, to share large files both internally and externally. Beginning at the end of 2017,

[1] (See https://www.purevpn.com/pages/server.php).

the City also began using its Dropbox account both (1) to house collections of documents *potentially* responsive to a Public Records Act (PRA) request for attorney review, and (2) to produce responses to third parties for larger requests for actual disclosure of documents made pursuant to the PRA, Government Code section 6250 et seq. (See Declaration of Mea Klein ("Klein Dec."), filed concurrently herewith, at ¶ 7).

33. Of the 117,417 events captured on the City's Dropbox account activity log over the three-year period from June 15, 2016 to June 21, 2019, 5,534 events (roughly 5%) were registered to foreign IP addresses associated with anonymizing VPN or TOR services using mostly foreign exit nodes. The remaining 111,882 of the events (roughly 95%) were performed by identified, logged in Dropbox users and authenticated non-randomized local and foreign access. (True and correct excerpts from the activity log for the City's Dropbox account, showing all "foreign" access to the account, is attached hereto as Exhibit A. A majority of the foreign accesses were the result of the use of a VPN or TOR service to mask the user's identity).

34. While it is routine for Dropbox to allow unidentified connections, typical users will routinely be logged in because of the behind-the-scenes default behavior of the Dropbox service, unless a user actively affirmatively logs out before clicking on a link, or uses a web-browser's "Privacy Mode" to prevent the automatic disclosure of web browser persistent information (cookies) which Dropbox uses to automatically log users in to its services. (See supra ¶ 21).

A. <u>Four Distinct Patterns of Foreign Access Appear on the Dropbox Activity Log</u>

35. In my review of the City's Dropbox activity log, there appear to be four distinct patterns of foreign access which are specific both in their technique and technology.

36. First, from April 18, 2017 to May 7, 2017, Cedric Villacencio (a Network Specialist who worked for the City of Fullerton from March 2013 to June 2017) accessed the City's Dropbox account while traveling in the Philippines. (See https://www.linkedin.com/in/cedric-villavicencio-0136942/). Mr. Villacencio's access was characterized by a linear, non-random pattern of access limited in time scope and mostly associated with mobile phone service providers. This was consistent with an individual who accessed the Dropbox account while traveling to a foreign country, rather than the use of a VPN or TOR service, in which event the POP locations would be

randomized. (See Exhibit A, at pp. 1-2). None of the Philippines IP addresses attributed to Mr. Villacencio align with known TOR or VPN exit nodes. (True and correct copies of the IP address details for the Philippine IP addresses on the activity log are attached as Exhibit B); and

37. Second, on August 23, 2017, a user accessed the City's Dropbox from Ahmedabad, India. As this access also followed a linear non-random pattern of access associated with a mobile phone service provider, this event was likely an authorized user accessing the Dropbox while traveling. (See Exhibit A, p. 2. A true and correct copy of the IP address details for the Indian IP addresses on the activity log is attached as Exhibit C).

38. Third, Joshua Ferguson began accessing the Dropbox account on December 28, 2017 via a VPN service, through mostly foreign exit nodes. At first, Mr. Ferguson accessed the Dropbox account while logged in, and after November 6, 2018, he accessed the account without logging in. (See infra ¶¶ 35-37).

39. Fourth, beginning in May of 2018, a TOR user (likely Mr. Curlee and/or one or more of Mr. Ferguson's other associates) began accessing the Dropbox account routinely through June 21, 2019, through mostly foreign exit nodes. (See infra ¶¶ 40, 46). TOR use is characterized by exit nodes being identifiable as TOR nodes, with all access points being anonymous, which is the default for TOR browsers, and the sudden randomness of exit node selection.

B. Mr. Ferguson and his Associates Knowingly Accessed the City's Dropbox Account and Took Materials they Knew to be Confidential and Privileged

40. The City's Dropbox activity log shows that Mr. Ferguson accessed the City's Dropbox account in three ways: (1) from December 28, 2017 to November 6, 2018, he accessed the account and downloaded files while logged in with his personal email addresses "joshua@joshuaferguson.com" and "joshua@thehourlystruggle.com;"[2]; (2) on December 29, 2017, he also accessed it and downloaded files while logged in with his work email address "info@fullertoncameras.com;"[3] and (3) from November 6, 2018 on, he accessed it without an email

[2] I am informed this email address is associated with Mr. Ferguson's Podcast "The Hourly Struggle."

[3] Mr. Ferguson works as a Salesman/Photographer at Fullerton Cameras and the email address there is "info@fullertoncameras.com." (See http://fullertoncameras.com/sample-page/). He likely downloaded files using a work computer that day.

login, while using a foreign VPN service to mask his identity and location. (A true and correct copy of excerpts from the City's Dropbox activity log showing all instances where Mr. Ferguson accessed the City's Dropbox account while logged in with one of his email addresses is attached hereto as Exhibit D).

1. Mr. Ferguson's Early Logged In Access Establishes He Used a VPN Service through Primarily Foreign Exit Nodes

41. Mr. Ferguson's personal and podcast email addresses appear on the activity log for the City's Dropbox account for his points of access and downloads dated from December 28, 2017 to November 6, 2018, which means he neglected to log out of his Dropbox accounts before accessing the City's Dropbox account during that time period. He must have previously logged into Dropbox using the same computer and did not realize, at that time, that it would result in Dropbox logging him in behind the scenes and recording his email address. (See supra ¶ 21).

42. Although Mr. Ferguson resides in California, the City's Dropbox activity log shows he accessed the account through both domestic and foreign IP addresses while logged in with his personal email addresses. A number of the foreign IP addresses are associated with a foreign VPN service: PureVPN. The other foreign exit nodes Mr. Ferguson used to access the City's Dropbox account while logged in are more generally associated with Internet carriers and data centers of the type PureVPN is a tenant. (True and correct copies of the IP address details for the above-referenced IP addresses registered to PureVPN are attached hereto as Exhibit E. True and correct copies of IP address details for the above-referenced Secure Internet LLC and AltusHost B.V. IP addresses are attached hereto as Exhibit F. A true and correct copy of a listing of some of the hosting providers utilized by PureVPN, including Secure Internet LLC and AltusHost B.V. is attached as Exhibit G).

43. On December 28, 2017, Mr. Ferguson downloaded a zip file named "ACUSA_PRR.zip," through an Oslo, Norway IP address (172.94.70.88) registered to Secure Internet LLC, which is associated with PureVPN. (See Exhibit D, p. 1);

44. On December 29, 2017, Mr. Ferguson downloaded the same folder, as well as a folder named "Pro-Card," through a Fullerton, California IP address registered to Charter/Spectrum (2605:e000:87d1: 3200:15c8: 723:e88:9b6e). (See Exhibit D, pp. 1-3; https://whatismyip

address.com/ip/ 2605: e000:87d1:3200:15c8:723:e88:9);

45. On December 30, 2017, he downloaded the same folder through two Oslo, Norway IP addresses (141.101.146.243 and 172.94.70.32). (See Exhibit D, p. 3). The 141.101.146.243 IP address is registered to PureVPN, and the 172.94.70.32 IP address is registered to Secure Internet LLC, which is associated with PureVPN. (See Exhibit E, pp. 1-3; Exhibit F, pp. 1-4);

46. On March 29, 2018, Mr. Ferguson downloaded the folders and zip files named "PRR_CE.zip," "Vernoica Duarte PRR" [sic], "Lucity," "Dukes," and "(Addendum No. 1 Plans).zip" through an Oslo, Norway IP address that is registered to PureVPN (141.101.146.225). (See Exhibit A, pp. 3-4; Exhibit E, pp. 1-3);

47. On October 26, 2018, he accessed the Dropbox account through a Netherlandic IP address (213.5.69.31) registered to AltusHost B.V., which is associated with PureVPN. (See Exhibit A, p. 4; Exhibit F, pp. 11-13);

48. On October 27 and 30, 2018, Mr. Ferguson accessed the Dropbox account through two Amsterdam, Netherlands IP addresses (185.2.31.200 and 185.2.29.211) registered to AltusHost B.V., which is associated with PureVPN. (See Exhibit A, p. 5; Exhibit F, pp. 5-10); and

49. On November 6, 2018, he accessed the account and downloaded the zip file "PPR_Cox.zip" through two Amsterdam, Netherlands IP addresses (188.72.82.15 and 188.72.82.73) registered to PureVPN. (See Exhibit A at p. 5; Exhibit E, at pp. 4-6).

50. On December 29, 2017, Mr. Ferguson accessed the City's Dropbox account from his work computer, as evidenced by the appearance of his work email address on the activity log for the City's Dropbox account. From his work computer, he downloaded the following folder and zip files that day: "ACUSA_PRR.zip," "51022 Malvern," and "Pro-Card.zip." (Exhibit D, pp. 1-2). Mr. Ferguson did not have the City's permission to access these Dropbox folders and files, as none of them had been produced to him, though the "Pro-Card.zip" file had been produced to Mr. Curlee. (Mea Klein Dec., ¶¶ 14-15 & Exhs. A-E thereto).

2. The Remaining Unidentified Foreign VPN Access to the City's Dropbox Account Can Also be Attributed to Mr. Ferguson

51. Evidence that Mr. Ferguson uses a foreign VPN service to obscure and mask his IP

address explains the significant number of foreign VPN origination IP addresses appearing on the City's Dropbox account activity log. Understanding that VPN service providers choose random exit POPs for their users explains the multiple and various foreign POPs on the City's Dropbox activity log.

52. A review of the City's Dropbox account activity log reveals that the account was accessed through the following foreign POP exit nodes between December 28, 2017 and June 21, 2019, using either a VPN or TOR service to mask the user's identity:

Country	City	Region
AT = Austria	Unknown	Unknown
CH = Switzerland	Hunenberg	Zug
CH = Switzerland	Unknown	Unknown
CH = Switzerland	Zurich	Zurich
BE = Belgium	Bruges	Flanders
DE = Germany	Berlin	Land Berlin
DE = Germany	Dusseldorf	North Rhine-Westphalia
DE = Germany	Frankfurt	Hesse
DE = Germany	Heidelberg	Baden-Werttemberg Region
DE = Germany	Kleve	North Rhine-Westphalia
DE = Germany	Murg	Baden-Werttemberg Region
DE = Germany	Rostock	Mecklenburg-Vorpommern
DE = Germany	Unknown	Unknown
DK = Denmark	Unknown	Unknown
ES = Spain	Unknown	Unknown
FR = France	Labege	Occitanie
FR = France	Longessaigne	Auvergne-Rhone-Alpes
FR = France	Paris	Ile-de-France
FR = France	Unknown	Unknown
GB = Great Britain	London	England
GB = Great Britain	Unknown	Unknown
HU = Hungary	Budapest	Budapest
ID = Indonesia	Unknown	Unknown
IE = Ireland	Unknown	Unknown
IS = Israel	Unknown	Unknown
LR = Liberia	Unknown	Unknown
LT = Lithuania	Unknown	Unknown
LV = Luxembourg	Unknown	Unknown
MD = Moldova	Chisinau	Chisinau Municipality
NL = Netherlands	Amsterdam	North Holland
NL = Netherlands	Haarlem	North Holland
NL = Netherlands	Unknown	Unknown
NO = Norway	Oslo	Oslo County
NO = Norway	Unknown	Unknown
PL = Poland	Katowice	Silesia
PR = Puerto Rico	San Juan	Unknown
RO = Romania	Bucharest	Bucuresti
RO =Romania	Timi»ôoara	Judetul Timis
RU = Russian Federation	Krasnodar	Krasnodarskiy Kray
RU = Russian Federation	Tambov	Tambovskaya Oblast'
RU = Russian Federation	Unknown	Unknown

Country	City	Region
RU = Russian Federation	Voronezh	Voronezhskaya Oblast'
SC = Seychelles	Unknown	Unknown
SE = Sweden	Gothenburg	Vastra Gotaland
SE = Sweden	Norrtaelje	Stockholm
SE = Sweden	Stockholm	Stockholm
SE = Sweden	Unknown	Unknown
SK = Slovak Republic	Unknown	Unknown
UA = Ukraine	Unknown	Unknown

(See Exhibit A).

53. In addition, there were a number of accesses and downloads with exit nodes attributed to "Unknown" country codes. Upon further research, these access points from "Unknown" country codes are actually registered to various TOR exit nodes, most of them European.

54. Even though many of the access points associated with a foreign IP address show no user identity, some of these IP addresses source from PureVPN, the same foreign VPN provider Mr. Ferguson used to access the City's Dropbox while logged in on December 28 and 30, 2017, March 29, 2018, and October 26 and 27, 2018.

55. For instance, PureVPN is associated with the foreign IP addresses used to access the City's Dropbox account on October 7, 12, and 23, 2018, November 8 and 19, 2018, December 4, 6, 10, and 12, 2018, March 6, 2019, April 19, 2019, May 11, 2019, and June 4, 7, 11 and 13, 2019, without a login. (See Exhibit A, at pp. 5-6, 16-17, 22, 26, 28, 32-35, 60, 69-70, 73 and 81-84, showing access to City's Dropbox account by the following PureVPN IP addresses: 141.101.146.7, 141.101.146.22, 141.101.146.33, 141.101.146.56, 141.101.146.77, 141.101.146.83, 141.101.146.87, 141.101.146.99, 141.101.146.111, 141.101.146.119, 188.72.82.46, 188.72.82.49, 188.72.82.57, 188.72.82.78, 188.72.82.80 and 188.72.82.107; Exhibit E).

56. PureVPN is also associated with the foreign IP addresses used to access the City's Dropbox account on March 29, 2018, September 27, 2018, October 1, 2018, October 2, 2018, October 9, 2018, October 13, 2018, October 18, 2018, October 19, 2018, October 22, 2018, December 28, 2018, January 10, 2019, January 22, 2019, March 25, 2019, April 30, 2019, and May 20, 2019, without a login. (See Exhibit A, at pp. 6, 15-16, 19, 21, 38, 43-44, 51, 63, 71 and 77, showing access to the City's Dropbox account by the following PureVPN ISP addresses:

185.2.29.184, 185.2.29.205, 185.2.31.218, 185.2.31.254, 213.5.69.8, 213.5.69.19, 213.5.69.49, 213.5.69.150, 213.5.69.160, 213.5.69.181, 213.5.69.184, and 213.5.69.185; Exhibit F, pp. 5-13; Exhibit G).

57. These foreign IP addresses associated with PureVPN can be attributed to Mr. Ferguson, as he used the same PureVPN service to access the City's Dropbox on December 30, 2017, March 29, 2018, and October 26 and 27, 2018. (See supra ¶ 37). It is unlikely that another individual would use the same foreign VPN provider as Mr. Ferguson, with the access coming remotely from the same Oslo and Amsterdam POPs he used on December 28, 2017, December 30, 2017, and March 29, 2018 is extremely remote. It is also unlikely that a European citizen would use a masked VPN IP address to search through records posted on the City's Dropbox account. As such, the unidentified foreign VPN access entries using the same PureVPN service used by Mr. Ferguson can also be attributed to Mr. Ferguson. (See Exhibits A, D-G).

3. Mr. Ferguson and Mr. Curlee Even Accessed Folders Actually Produced to them by the City through Foreign VPN and TOR Services

58. I am informed the City produced two Dropbox folders to Mr. Ferguson: (1) a folder with the link https://www.dropbox.com/sh/7w3qxzsem5dy30o/AAAPeXjh_JmChAOs8d66TUfTa?dl=0 produced to him on December 12, 2018, in response to his PRR No. 18-442; and (2) a folder named "19-135 Datathehourlystruggle.com" produced to him on April 9, 2019, in response to his PRR No. 19-135. (See Klein Dec., ¶¶ 14c, 14d & Exhs. C & D thereto). The City did not give Mr. Ferguson authority to access any other Dropbox folders in its account, nor did it authorize Mr. Ferguson to share the links to these folders with any other parties. (See Klein Dec. ¶ 15). As can be seen from the structure of the Dropbox link, it is not possible to guess a valid Dropbox link value, and the random number generator Dropbox uses to produce them is designed to require longer than the present lifetime of the Universe to iterate through all possible values. A file may only be accessed by the sharing of an invitation link to a specific file or folder within the Dropbox account, or a link to the parent folder at the top of the Dropbox account (which gives a user access to *all* files and folders contained within the entire Dropbox account).

59. The City also produced three Dropbox folders and zip files to Mr. Ferguson's

associate, Mr. Curlee: (1) a zip file named "Pro-Card.zip" produced to him on September 26, 2017 in response to his PRR No. 17-387; (2) a zip file named "PPR_18_326_Curlee.zip" produced to him on November 27, 2018, in response to his PRR No. 18-326; and (3) a folder named "PRR Pro Card 5-29-19" produced to him on June 6, 2019 in response to his PRR No. 19-235. (See Klein Dec., ¶ 14a, 14b, 14e & Exhs. A, B & E thereto). The City did not give Mr. Curlee permission to access any other Dropbox folders in its account, nor did it give Mr. Curlee permission to share the links to these files and folders with any other third parties. (See Klein Dec. ¶ 15).

60. The City's Dropbox activity log also shows that the following files specifically produced to Mr. Ferguson and Mr. Curlee (and no other third parties) were downloaded via a TOR service or foreign VPN provider through mostly European POPs, providing further evidence that the foreign VPN and TOR accesses to the City's Dropbox account are associated with Mr. Ferguson, Mr. Curlee and their associates:

61. "PPR_18_326_Curlee.zip": This Dropbox zip file was produced to Mr. Curlee on November 27, 2018, in response to his PRR No. 18-326, (see Klein Dec., ¶ 14b & Ex. B thereto), and was thereafter accessed and downloaded by unidentified users on November 28, 2018 through France, then later the same day through the Netherlands, utilizing the same PureVPN service used by Mr. Ferguson. Interestingly, no access or download of this file occurred from within the United States even though it was produced to Mr. Curlee, a resident of the United States, providing further evidence that the unidentified users who accessed this file were none other than Mr. Ferguson and Mr. Curlee. (See Exhibit A, at p. 30; Klein Dec., ¶ 14b & Exh. B);

62. "19-135 Datathehourlystruggle.com": This Dropbox folder was produced to Mr. Ferguson on April 9, 2019, in response to his PRR No. 19-135, (see Klein Dec., ¶ 14d & Exh. D thereto), and was thereafter downloaded and accessed by unidentified users through Amsterdam, Netherlands on June 10, 2019 and Sweden on June 14, 2019. (See Exhibit A, at pp. 83, 84); and

63. "PRR Pro Card 5-29-19.zip": This Dropbox zip file was produced to Mr. Curlee on June 6, 2019, in response to his PRR No. 19-235, (see Klein Dec. ¶ 14e & Exh. E thereto), and was thereafter downloaded by an unidentified user utilizing TOR to mask his identity. There was no other third-party access to this folder, leading to the inescapable conclusion that the TOR user was

none other than Mr. Curlee himself. (See Exhibit A, at p. 82. (True and correct excerpts from the City's Dropbox activity log reflecting all activity associated with the "PRR Pro Card 5-29-19.zip" file, as well as a true and correct copy of the IP address details identifying the IP address 178.175.132.214 as a TOR exit node are attached hereto as Exhibit H).

64. That Mr. Ferguson and Mr. Curlee accessed even those folders produced to them through VPN and TOR anonymizing services through foreign exit nodes is further evidence not only that they use VPN and TOR services to mask their identities, but that the other unidentified VPN and TOR access and downloads appearing on the activity log can also be attributed to them.

4. The Utilization of Dropbox's "Synchronized" Download Feature through a Foreign VPN Service Further Links Mr. Ferguson to the Unidentified Foreign VPN Access Points

65. A unique feature of Dropbox is that a single file can be "synchronized" in multiple chunks, with each chunk constituting a separate download. The resulting file can be reconstructed by the Dropbox client on their local computer. This can occur when a Dropbox file is downloaded through a VPN provider with multiple national POPs. As such, the following Dropbox zip files downloaded with this "synchronized" method in multiple chunks, without the City's permission or authority can be attributed to a user utilizing a foreign VPN service, i.e., Mr. Ferguson:

a. "PRR_JF_20181002.zip": This zip file was downloaded in multiple chunks, through Chicago, La Mirada, the Netherlands, and Germany, within minutes of one another, on October 2, 2018. (See Exhibit A, at pp. 16).

b. "JF_PRR20181012.zip": Similarly, this zip file came through La Mirada, Norway, Netherlands, Liberia, France and Switzerland during the same download session on October 13, 2018. (See Exhibit A, at pp. 18-20).

c. "JF_PRR_2.zip": This zip file was downloaded in three chunks on October 30, 2018, through Switzerland, Slovakia and Los Angeles, within minutes of each other. (See Exhibit A, at pp. 23-24).

d. "Pr1919 – Josh Ferguson.zip" (The Subject File): This zip file was downloaded through Liberia on May 10, 2019, then again in multiple chunks on May 13, 2018, through the Netherlands, La Mirada and Fullerton, at

slightly different times. (See Exhibit A, at pp. 73-74).

5. The Overall Pattern of Access Also Links Mr. Ferguson and his Associates' Connection to the Unidentified VPN and TOR Accesses and Downloads

66. Based on the pattern of the VPN and TOR access to the Dropbox, including the dates and types of access, exit POPs used, folders and files taken (many of which specifically referenced Mr. Ferguson, his initials or Mr. Curlee),[4] and the fact that many of the same files were downloaded and related to subjects of interest to The Blog, (see infra Part IV.C., at pp. 23-25), the VPN and TOR users were almost certainly Mr. Ferguson, Mr. Curlee (and possibly additional associates). No other identified individuals accessing the City's Dropbox account besides Mr. Ferguson and his associates were attempting to obscure their identity by using an anonymizing VPN or TOR service through foreign exit nodes. (See Exhibit A). Furthermore, certain PRR files produced only to Mr. Curlee were downloaded only by TOR and VPN users through foreign exit nodes. (See supra ¶ 46).

67. Between December 19, 2017 and June 10, 2019 TOR and foreign VPN users downloaded the following folders and files via foreign exit nodes (primarily through Europe), with the vast majority occurring on and after March 29, 2018:

/File requests/Outbox/(Addendum No. 1 Plans).zip
/File requests/Outbox/1_Laguna Lake Files
/File requests/Outbox/129 W Commonwealth - Graphics
/File requests/Outbox/1310 Sorrento Pl
/File requests/Outbox/19-135 Datathehourlystruggle.com
/File requests/Outbox/52588 BID
/File requests/Outbox/56019 Fiber
/File requests/Outbox/ACUSA_H21 Leases
/File requests/Outbox/ACUSA_PRR.zip
/File requests/Outbox/Airport Database/Fullerton Municipal Airport.mdb
/File requests/Outbox/AxonPRR.zip
/File requests/Outbox/CE_PRR_KC.zip
/File requests/Outbox/Citywide Bicycle \u0026 Ped. Improvement Project
/File requests/Outbox/COF_CADD_PACKAGE-REV-2015-08
/File requests/Outbox/council_20180430.zip
/File requests/Outbox/Drainage Master Plan/1996 Boyle/COF_comprehensive master plan of drainage_1996.pdf
/File requests/Outbox/Dukes
/File requests/Outbox/FD_20180430.zip
/File requests/Outbox/Hillcrest Park
/File requests/Outbox/JF_PRR_2.zip

[4] The "JF," "Ferguson" and "thehourlystruggle" in these folder and file names refer to Mr. Ferguson. (Klein Dec., p. 8, at fn.3).

/File requests/Outbox/JF_PRR20181012.zip
/File requests/Outbox/JF_PRR_PD.zip
/File requests/Outbox/KCCPRR - Redacted.zip
/File requests/Outbox/Keith Cangiarella PRR Responsive E-mails.zip
/File requests/Outbox/Kevin/COF_Kevin.docx
/File requests/Outbox/Lease Files.zip
/File requests/Outbox/Lucity
/File requests/Outbox/NARCOTICS
/File requests/Outbox/Police
/File requests/Outbox/PRR 18-225 Replogle Responsive E-mails.pdf
/File requests/Outbox/PPR_18_326_Curlee.zip
/File requests/Outbox/PR19-171VD_1_2.zip
/File requests/Outbox/pr1919 - Josh Ferguson.zip
/File requests/Outbox/PRR_1600_2.7z
/File requests/Outbox/PRR_19-134_data@thehourlystruggle.com.zip
/File requests/Outbox/PRR Accela 8-17-17
/File requests/Outbox/PRR_AIR20180604.zip
/File requests/Outbox/PRR_CE.zip
/File requests/Outbox/PPR_Cox.zip
/File requests/Outbox/PRR_JF_20181002.zip
/File requests/Outbox/PRR Pro Card 5-29-19.zip
/File requests/Outbox/PRRS01082019
/File requests/Outbox/PRRS01082019.zip
/File requests/Outbox/PRRS01092019.zip
/File requests/Outbox/PRRS01092019_all.zip
/File requests/Outbox/PRRS01152019_JF.zip
/File requests/Outbox/Public Records Request
/File requests/Outbox/Vernoica Duarte PRR [sic]
/File requests/Outbox/Veronica Duarte - Air Combat
/File requests/Outbox/Veronica Duarte.zip
/File requests/Outbox/VM.zip
/File requests/Outbox/Water

(See Exhibit D).

68. It should be noted that there were also additional folders and zip files downloaded by TOR user(s) with exit nodes registered with "Unknown" country codes. The TOR user(s) with "Unknown" country codes downloaded some of the same Dropbox folders and zip files downloaded by the VPN and TOR users with specific foreign country codes listed above. The unique folders and zip files downloaded by the TOR user(s) with "Unknown" country codes include the following:

/File requests/Outbox/Downtown Parking Management/Downtown Parking.pdf's/ Kiosk Sign (Attachment 2).pdf/File requests/Outbox/HL_PRR
/File requests/Outbox/PR19-188VD.zip
/File requests/Outbox/PrePlans.PDF
/File requests/Outbox/PRRS02042019_VD.zip
/File requests/Outbox/PRRS02042019_VD_2.zip
/File requests/Outbox/PRSueMcGraw.zip

/File requests/Outbox/Tiger_Signal_PRR.zip

6. The Subject File ("pr1919—Joshua Ferguson.zip") and Many Others Taken by Mr. Ferguson and His Associates Were Privileged and Intended for Attorney's Eyes Only

69. I understand that the primary City Dropbox zip file at issue is named "pr1919 – Josh Ferguson.zip" (the "Subject File"). The Subject File was added to the City's Dropbox account on May 7, 2019 and contained PST files that included over 11,000 emails (not including attachments). These PST files were collected using very broad search terms that Mr. Ferguson requested the City to run in response to a Public Records Act request that he first made on January 2, 2019. The requested search terms ("Record Retention," "Police Records," "Retention," "Personnel Files," "Deleted Records," "Oversight," "Personnel Records," and "Limitations") were to be run across the email boxes of 20 top level City employees and officials, without any date limitations. (Klein Dec., ¶¶ 17-20 & Exhs. E & F thereto).[5] I understand that these PST files were generated by a city IT technician using the search terms only, and without regard to the contents of the bodies of the email messages. (Klein Dec. ¶ 10).

70. Because the requested search terms were certain to yield privileged and confidential information relating to personnel matters, it is my understanding that attorney review would be required before any production could be made. (See Klein Dec., ¶ 20). Shortly after the City's IT department added the Subject File to the City's Dropbox account (on May 7, 2019), and before the City advised Mr. Ferguson it would need him to further narrow his request before a production could be made (on May 24, 2019), Mr. Ferguson had already accessed the Subject File and downloaded its contents via his European VPN service (on May 10, 2019). (See Klein Dec., ¶¶ 17, 21; see also supra ¶ 48d). However, Mr. Ferguson was clearly on notice that the City had not authorized, permitted or consented for him to view, download or use the Subject File and its contents, which were clearly intended for attorney review only, as he never received a link to the Subject File. (See Klein Dec., ¶¶ 17-21 & Exhs. F-H thereto).

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[5] Mr. Ferguson's request initially asked that the search terms be run across the email boxes of all City employees and officials (approximately 500 individuals). (*See* Klein Dec., ¶ 19).

71. The Subject File is a compressed zip file containing the following 48 PST files:

pr1919JF_from_al.pst	pr1919JF_from_tw (1).pst	pr1919JF_to_jf.pst
pr1919JF_from_at_to_jb.pst	pr1919JF_from_wk.pst	pr1919JF_to_kn.pst
pr1919JF_from_dh_to_ls.pst	pr1919JF_from_yv.pst	pr1919JF_to_jr (1).pst
pr1919JF_from_gb.pst	pr1919JF_to_al.pst	pr1919JF_to_jr.pst
pr1919JF_from_gm_to_kd.pst	pr1919JF_to_at.pst	pr1919JF_to_js.pst
pr1919JF_from_jb.pst	pr1919JF_to_bw.pst	pr1919JF_to_mo_1 (1).pst
pr1919JF_from_jb_to_at.pst	pr1919JF_to_db.pst	pr1919JF_to_mo_1.pst
pr1919JF_from_jf.pst	pr1919JF_to_dc.pst	pr1919JF_to_mo_2 (1).pst
pr1919JF_from_jr (1).pst	pr1919JF_to_dh.pst	pr1919JF_to_mo_2.pst
pr1919JF_from_jr.pst	pr1919JF_to_dq.pst	pr1919JF_to_rd.pst
pr1919JF_from_kd_to_gm (1).pst	pr1919JF_to_ea.pst	pr1919JF_to_tw (1).pst
pr1919JF_from_kd_to_gm.pst	pr1919JF_to_gb_1.pst	pr1919JF_to_tw.pst
pr1919JF_from_ls_to_dh.pst	pr1919JF_to_gb_2.pst	pr1919JF_to_wk.pst
pr1919JF_from_mo.pst	pr1919JF_to_gs.pst	pr1919JF_to_yv_1.pst
pr1919JF_from_rd.pst	pr1919JF_to_hc.pst	pr1919JF_to_yv_2.pst
pr1919JF_from_tw.pst	pr1919JF_to_jb.pst	pr1919JF_to_yv_3.pst

72. Each of these files is a PST file[6] that in turn contains dozens, hundreds or thousands of email messages in the Microsoft Outlook email client format. (The PST file "pr1919JF_to_gb_1," for example, contains 2,256 emails plus attachments). The PST files contain email messages or attachments containing one or more of the search terms requested by Mr. Ferguson. The email messages contained in these PST files were collected for review by the City's attorneys for the purpose of (1) identifying responsive records and (2) identifying records and information exempted from public disclosure under the Public Records Act (such as attorney-client privileged communications and drafts, private employee information, etc.). (See Klein Dec., ¶¶ 10c, 10d, 12, 16, 20).

73. Other folders containing PST files, which were never produced to any third parties, were similarly added to the City's Dropbox account for attorney review only, including but not limited to:

- "ACUSA_PRR.zip,"
- "JF_PRR_2,"
- "JF_PRR20181012,"
- "pr1919 - Josh Ferguson,"

[6] PST files are the native email storage format used by Microsoft Outlook email client and they can also be generated from a Microsoft Exchange email server by running search terms and other parameters such as date scope and user limitations against an email server. PST files are databases with their own folder hierarchy and may contain up to millions of email messages, attachments, and other data such as notes or calendar items within a single computer file. PST files can only be opened within Outlook or using other special software. An ordinary consumer would not know how to open a PST file. Double clicking on a PST file would not open it even with Outlook installed.

- "PRR_JF_20181002,"
- "PRRS01152019_JF,"[7]
- "PRR_19-134_data@thehourlystruggle.com," and
- "Tiger_Signal_PRR.zip"

(See Klein Dec., ¶ 16).

74. Mr. Ferguson and/or his associates downloaded each of these Dropbox folders and zip files containing PST files intended for the City's attorney to review and not for third parties, along with other folders and zip files. (See supra, ¶¶ 37, 38, 48, 49 & Exhibit A).

7. Mr. Ferguson and his Associates Inappropriately Used and Published Privileged and Confidential City Records on their Blog Posts, without the City's Permission

75. I have reviewed postings from The Blog and I have compared various materials that have been posted relating to City personnel and issues with the Subject File and other City Dropbox folders containing PST files created for attorney review. The City document excerpts published on the Blog by Mr. Ferguson and his associates since May 2019 correspond exactly with Dropbox folders containing PST files that were clearly intended for the City's attorneys and therefore highly likely to contain privileged information. Examples are numerous and include the following:

76. *Blog Post*: "Fullerton Police Cut A Deal to Bypass the Law" published on June 11th, 2019 at: https://www.fullertonsfuture.org/2019/fullerton-police-cut-a-deal-to-bypass-the-law/. *Confidential document published*: Privileged draft employee separation agreement. *Source document*: Privileged email entitled "Fwd: Hamel," between the Chief of Police, Gretchen Beatty and outside legal counsel Arthur Hartinger and Julie Hokanson of Public Law Group. *Taken from*: PST file "pr1919JF_to_gb_2" contained within the Subject File;

77. *Blog Post*: "So What Did Lieutenant Kathryn Hamel Do?" published on June 13, 2019 at: https://www.fullertonsfuture.org/2019/so-what-did-lieutenant-katheryn-hamel-do/. *Confidential document published*: Privileged email regarding PD Internal affairs and confidential settlement communications; privileged draft settlement agreement. *Source documents*: Confidential

[7] It should also be noted that Mr. Ferguson's co-worker from Fullerton Cameras, Chris Tennyson, also accessed and downloaded this file on January 16, 2019. That zip file had not been produced to Mr. Tennyson, Mr. Ferguson or any of his other associates, and it contained PST files intended for the City's attorneys. (A true and correct copy of excerpts from the activity log for the City's Dropbox account showing Mr. Tennyson's logged in access and download are attached hereto as Exhibit I; see also Klein Dec. ¶ 16).

email entitled "Confidential Settlement Communications" from City's outside counsel Arthur Hartinger of Public Law Group." *Taken from*: PST file "pr1919JF_to_rd.pst" contained within the Subject File;

78. *Blog Post*: "What Happened to Officer Christopher Wren" published on June 13, 2019, at https://www.fullertonsfuture.org/2019/what-happened-to-officer-christopher-wren/. *Confidential document published*: Human resources disciplinary documents. *Source documents*: PDF entitled "Wren Letter of Discipline," attached to email entitled "Wren Documents-FU020(067)." *Taken from*: PST file "pr1919JF_to_gb_2.pst" contained within the Subject File.

79. *Blog Post*: "Parks Employee Cost Fullerton 40K" published on June 20, 2019 at: https://www.fullertonsfuture.org/2019/parks-employee-cost-fullerton-40k/. - *Confidential documents published*: Confidential insurance claim document and Privileged draft Closed Session Memo re anticipated litigation. *Source documents*: Email entitled "Anticipated Litigation - Cody Carter/Allstate Insurance" and attachments thereto. *Taken from*: PST file "pr1919JF_to_gb_2" contained within the Subject File;

80. *Blog Post*: "Fight A Paramedic, Win A $100K" published on June 27, 2019 at https://www.fullertonsfuture.org/2019/fight-a-paramedic-win-a-100k/. *Confidential document published*: Privileged email containing confidential human resources information. *Source documents*: Email entitled "RE_ Draft Chief Announcement [AALRR-Cerritos.005868.00014]," between City Manager, PR consultants and outside counsel Irma Rodriguez Moisa of Atkinson, Andelson, Loya, Ruud & Romo (AALRR). *Taken from*: PST file "pr1919JF_to_gb_2" contained within the Subject File;

81. These privileged and confidential documents taken from the Dropbox Subject File "pr1919 – Joshua Ferguson.zip" were posted after May 10, 2019 (Mr. Ferguson's first download of the Subject File) and significantly, after May 24, 2019 (when the City put Mr. Ferguson on clear notice that it was not ready to provide any materials to him in response to his request because of the breadth of his request and the cost and time it would take to perform a legal review of the search results to remove any private, confidential and privileged materials). (See Klein Dec. ¶ 21 & Exhs. G & H thereto).

82. These examples are not intended to be exhaustive; they are merely the recent blog articles I checked and whose content I searched against the contents of the Subject File, which was intended for the City's attorneys and was obtained, downloaded and used by Mr. Ferguson without the City's permission or authorization. The Subject File was not produced to either Mr. Ferguson, his associates, or any other third parties. (See Klein Dec., ¶¶ 10c, 12, 14, 16, 20).

83. Mr. Ferguson and his accomplices did not just take and publish privileged and confidential documents from the Subject File, however. They also knowingly accessed, downloaded and used other Dropbox zip files containing PST files for attorney's eyes only, without the City's permission or authority. (See supra ¶ 55; Klein Dec., ¶ 16).

84. An example of a Blog post that published excerpts from a clearly privileged email taken from a City Dropbox zip file other than the Subject File includes the July 8, 2019 post "Is Fullerton PD Illegally Destroying Records?" published at https://www.fullertonsfuture.org/2019/is-fullerton-pd-illegally-destroying-records. The privileged email excerpted in that post came from an email entitled "RE: Records Request" between the Chief of Police, City Manager and Deputy City Attorney Ivy Tsai, which was taken from the PST files "AUTO_PST" and "SIGNAL_PRR" contained within the "Tiger_Signal_PRR.zip" file. This Dropbox file was also not produced to either Mr. Ferguson, his associates or any other third parties. (Klein Dec. ¶ 10c, 12, 14, 16 & n. 3).

85. An unidentified TOR user downloaded the "Tiger_Signal_PRR.zip" Dropbox file on September 26, 2018, through France and Michigan. Another unidentified user utilizing PureVPN (the same VPN service utilized by Mr. Ferguson) downloaded the file later that same day, through the Netherlands and Los Angeles. An unidentified user accessed the file through Victoria, Seychelles, on September 27, 2018. (True and correct copies of excerpts from the Dropbox activity log showing all activity for the Dropbox file "Tiger_Signal_PRR.zip," as well as the IP address details for the above-referenced accesses and downloads are attached as Exhibit J).[8]

[8] The French IP address that accessed and downloaded this file that day is registered to Nos-Oignons, a French TOR service. (See https://nos-oignons.net/%C3%80_propos/index.en.html). "Les oignons" means "the onions" in French. See https://translate.google.com/.

V. CONCLUSION

86. The evidence from the City's Dropbox activity log, together with the history and nature of the PRA requests made by Mr. Ferguson and his associates (and the City's responses thereto), and the contents of the City's Dropbox folders and files, establish that Mr. Ferguson and his associates: (1) knowingly accessed confidential, private and privileged material posted to the City's Dropbox account solely for its attorneys' review, using a foreign VPN and TOR service to anonymize their activities, and (2) used such confidential, private and privileged material without the City's authorization, consent or permission by posting and publishing said materials on The Blog.

87. My analysis may change before trial if additional information from any of the parties-in-suit or their experts becomes available. I, therefore, reserve the right to supplement my declaration accordingly.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of October 2019 at Carlsbad, California.

Matthew Strebe

EXHIBIT A

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2017-04-18T05:35:32+00:00	Devices	Mobile device IP changed	130.105.216.62	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-19T11:01:55+00:00	Devices	Mobile device IP changed	202.128.53.168	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-19T15:16:04+00:00	Devices	Mobile device IP changed	130.105.216.62	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-20T05:41:24+00:00	Devices	Mobile device IP changed	58.69.192.179	PH	Lapu-Lapu City	Central Visayas		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-21T08:35:34+00:00	Devices	Mobile device IP changed	58.69.192.179	PH	Lapu-Lapu City	Central Visayas		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-22T13:36:58+00:00	Devices	Mobile device IP changed	112.198.101.24	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-22T15:43:24+00:00	Devices	Mobile device IP changed	130.105.200.140	PH	Makati City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-22T22:47:14+00:00	Devices	Mobile device IP changed	130.105.200.140	PH	Makati City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-23T13:07:06+00:00	Devices	Mobile device IP changed	130.105.200.134	PH	Makati City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-24T11:43:05+00:00	Devices	Mobile device IP changed	144.48.201.18	PH	Unknown	Unknown		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-24T11:43:05+00:00	Devices	Mobile device IP changed	144.48.201.18	PH	Unknown	Unknown		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-26T04:22:14+00:00	Devices	Mobile device IP changed	112.198.78.84	PH	San Miguel	Central Luzon		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-26T16:12:54+00:00	Devices	Mobile device IP changed	130.105.200.15	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-27T15:59:25+00:00	Devices	Mobile device IP changed	130.105.217.39	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-28T08:59:24+00:00	Devices	Mobile device IP changed	130.105.216.30	PH	San Miguel	Central Luzon		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-28T15:51:55+00:00	Devices	Mobile device IP changed	130.105.201.250	PH	Central	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-04-30T08:51:47+00:00	Devices	Mobile device IP changed	124.106.19.250	PH	Bule	Calabarzon		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-01T10:42:13+00:00	Devices	Mobile device IP changed	130.105.217.233	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-01T22:04:54+00:00	Devices	Mobile device IP changed	130.105.217.233	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-02T09:12:36+00:00	Devices	Mobile device IP changed	130.105.217.13	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-02T16:28:43+00:00	Devices	Mobile device IP changed	130.105.217.13	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-03T01:15:36+00:00	Devices	Mobile device IP changed	112.209.42.151	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-03T05:44:52+00:00	Devices	Mobile device IP changed	130.105.217.13	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-03T12:46:43+00:00	Devices	Mobile device IP changed	130.105.201.137	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-03T16:30:22+00:00	Devices	Mobile device IP changed	130.105.201.137	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-04T00:16:13+00:00	Devices	Mobile device IP changed	130.105.201.137	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-04T02:38:58+00:00	Devices	Mobile device IP changed	130.105.201.137	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-04T05:54:09+00:00	Devices	Mobile device IP changed	112.198.77.14	PH	San Juan	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2017-05-05T06:08:00+00:00	Devices	Mobile device IP changed	130.105.201.40	PH	Quezon City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-05T16:03:29+00:00	Devices	Mobile device IP changed	130.105.201.49	PH	Manila	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-06T16:49:26+00:00	Devices	Mobile device IP changed	130.105.200.139	PH	Makati City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-05-07T10:50:12+00:00	Devices	Mobile device IP changed	130.105.201.200	PH	Mandaluyong City	Metro Manila		Cedric Villavicencio	cedricv@cityoffullerton.com	{"platform": "Mobile", "app_id": 48, "host_id": 255781133, "name": "Dropbox for Android"}
2017-08-23T10:42:21+00:00	Sharing	Opened a link (non-team member)	2405:204:838c:f003:8179:b3a5:ae53:e218	IN	Ahmedabad	Gujarat	Jio			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Accela 8-17-17", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR Accela 8-17-17**", "is_dir": true}
2017-08-23T10:45:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2405:204:838c:f003:8179:b3a5:ae53:e218	IN	Ahmedabad	Gujarat	Jio			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Accela 8-17-17", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR Accela 8-17-17**", "is_dir": true}
2017-12-28T20:41:00+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	172.94.70.88	NO	Oslo	Oslo County	Secure Internet LLC (PureVPN)	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_PRR.zip**", "is_dir": false}
2017-12-30T19:42:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	172.94.70.32	NO	Oslo	Oslo County	Secure Internet LLC (PureVPN)	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_PRR.zip**", "is_dir": false}
2017-12-30T20:03:57+00:00	Sharing	Opened a link (non-team member)	2a03:2880:30:afdc:face:b00c:0:8000	IE	Unknown	Unknown	Facebook - Ireland			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-30T20:03:59+00:00	Sharing	Opened a link (non-team member)	2a03:2880:11:6ff7:face:b00c:0:8000	IE	Unknown	Unknown	Facebook - Ireland			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2017-12-30T20:58:18+00:00	Sharing	Opened a link (non-team member)	141.101.146.243	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-30T20:59:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.243	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "**ACUSA_PRR.zip**", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_PRR.zip**", "is_dir": false}
2018-01-01T22:15:29+00:00	Sharing	Opened a link (non-team member)	167.114.118.4	CA	Montreal	Quebec	OVH			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-01-01T22:16:03+00:00	Sharing	Opened a link (non-team member)	167.114.118.4	CA	Montreal	Quebec	OVH			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-01-01T22:20:27+00:00	Sharing	Opened a link (non-team member)	92.63.100.80	RU	Unknown	Unknown	Cjsc The First (Russian Hosting)			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-01-01T22:21:11+00:00	Sharing	Opened a link (non-team member)	92.63.100.80	RU	Unknown	Unknown	Cjsc The First (Russian Hosting)			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-01-01T22:24:43+00:00	Sharing	Opened a link (non-team member)	185.38.14.215	NL	Unknown	Unknown	YISP B.V.			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-01-01T22:25:34+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.38.14.215	NL	Unknown	Unknown	YISP B.V.			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2018-01-01T22:25:49+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.38.14.215	NL	Unknown	Unknown	YISP B.V.			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2018-01-01T22:30:03+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	37.220.35.202	NL	Unknown	Unknown	YISP B.V.			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2018-01-26T23:36:01+00:00	Sharing	Opened a link (non-team member)	51.15.63.229	NL	Haarlem	North Holland	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-02-10T03:00:48+00:00	Sharing	Opened a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-02-10T03:01:13+00:00	Sharing	Opened a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "COF_CADD_PACKAGE-REV-2015-08", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/COF_CADD_PACKAGE-REV-2015-08", "is_dir": true}
2018-02-10T03:01:28+00:00	Sharing	Opened a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Hillcrest Park", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Hillcrest Park", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-02-10T03:01:51+00:00	Sharing	Opened a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "OCFCD Submittal_7262017", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Hillcrest Park/OCFCD Submittal_7262017**", "is_dir": true}
2018-02-14T00:08:37+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:2048::2	MD	Unknown	Unknown	Trabia Network			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-02-14T00:10:31+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:2048::2	MD	Unknown	Unknown	Trabia Network			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Public Records Request", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Public Records Request**", "is_dir": true}
2018-02-14T00:10:52+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:2048::2	MD	Unknown	Unknown	Trabia Network			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Citywide Bicycle \u0026 Ped. Improvement Project", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Citywide Bicycle \u0026 Ped. Improvement Project**", "is_dir": true}
2018-02-22T01:21:04+00:00	Sharing	Opened a link (non-team member)	62.210.71.205	FR	Unknown	Unknown	Free SAS			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:09:16+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:09:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "**PRR_CE.zip**", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_CE.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-03-29T20:10:09+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Vernoica Duarte PRR", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Vernoica Duarte PRR**", "is_dir": true}
2018-03-29T20:10:16+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:10:23+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Lucity", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Lucity**", "is_dir": true}
2018-03-29T20:10:28+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:10:33+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Dukes", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Dukes**", "is_dir": true}
2018-03-29T20:10:37+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:11:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	PureVPN	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "(Addendum No. 1 Plans).zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**(Addendum No. 1 Plans).zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-03-29T20:50:10+00:00	Sharing	Opened a link (non-team member)	213.5.69.181	NL	Unknown	Unknown	AltusHost			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:52:48+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	213.5.69.181	NL	Unknown	Unknown	AltusHost			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_CE.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR_CE.zip", "is_dir": false}
2018-03-29T21:04:42+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	46.243.146.41	LB	Beirut	Beyrouth	PureVPN			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_CE.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR_CE.zip", "is_dir": false}
2018-03-29T21:40:32+00:00	Sharing	Opened a link (non-team member)	46.243.146.41	LB	Beirut	Beyrouth	PureVPN			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T21:40:46+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	46.243.146.41	LB	Beirut	Beyrouth	PureVPN			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_CE.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR_CE.zip", "is_dir": false}
2018-04-12T21:52:02+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-12T21:56:16+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-12T21:57:15+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-04-12T21:58:07+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T21:58:17+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T21:59:26+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:00:44+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:01:19+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:02:15+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:07:46+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:08:54+00:00	Sharing	Opened a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-04-12T22:10:06+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:12:30+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-12T22:17:52+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.90.244.23	DE	Frankfurt am Main	Hesse	Savvii HQ (Managed WordPress Blog Software			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-13T00:58:46+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T00:59:35+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T01:00:32+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T01:02:01+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-13T01:02:41+00:00	Sharing	Opened a link (non-team member)	185.217.95.199	NL	Unknown	Unknown	Abelohost BV			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-04-13T01:06:02+00:00	Sharing	Opened a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T01:08:36+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T01:10:02+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-04-13T01:11:08+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	51.15.86.162	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-04-13T01:15:58+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	163.172.67.180	FR	Unknown	Unknown	Free SAS			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/CE_PRR_KC.zip", "is_dir": false}
2018-05-01T21:54:44+00:00	Sharing	Opened a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-05-01T21:55:26+00:00	Sharing	Opened a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-05-01T21:55:48+00:00	Sharing	Opened a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-05-01T21:56:59+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-05-01T21:57:37+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "CE_PRR_KC.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**CE_PRR_KC.zip**", "is_dir": false}
2018-05-01T21:58:03+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "council_20180430.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**council_20180430.zip**", "is_dir": false}
2018-05-01T21:58:37+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "FD_20180430.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**FD_20180430.zip**", "is_dir": false}
2018-05-01T21:59:08+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "KCCPRR - Redacted.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**KCCPRR - Redacted.zip**", "is_dir": false}
2018-05-01T21:59:30+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.50.191.250	CH	Unknown	Unknown	TOR			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Keith Cangiarella PRR Responsive E-mails.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Keith Cangiarella PRR Responsive E-mails.zip**", "is_dir": false}
2018-05-01T22:00:56+00:00	Sharing	Opened a link (non-team member)	51.15.88.249	NL	Unknown	Unknown	Scaleway			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-05-01T22:05:55+00:00	Sharing	Opened a link (non-team member)	185.212.149.72	FI	Helsinki	Uusimaa				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-05-01T22:08:13+00:00	Sharing	Opened a link (non-team member)	5.79.86.15	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-06T21:43:38+00:00	Sharing	Opened a link (non-team member)	93.115.95.201	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-06T21:43:39+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-06T21:44:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_AIR20180604.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_AIR20180604.zip**", "is_dir": false}
2018-06-14T15:58:13+00:00	Sharing	Opened a link (non-team member)	93.115.95.206	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-14T16:01:42+00:00	Sharing	Opened a link (non-team member)	2a00:801:4f:2105:21a:4aff:fea5:ad02	SE	Stockholm	Stockholm				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-14T16:04:38+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-06-14T17:43:32+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	212.47.227.114	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "VM.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/VM.zip", "is_dir": false}
2018-06-14T18:59:40+00:00	Sharing	Opened a link (non-team member)	2001:41d0:302:2000::158b	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-14T19:47:28+00:00	Sharing	Opened a link (non-team member)	93.115.95.204	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-06-14T19:49:16+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a03:4000:21:435::dead:beef	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "VM.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/VM.zip", "is_dir": false}
2018-06-14T21:26:33+00:00	Sharing	Opened a link (non-team member)	91.235.129.94	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Water", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Water", "is_dir": true}
2018-07-26T23:44:44+00:00	Sharing	Opened a link (non-team member)	2a00:801:4f:2105:21a:4aff:fea5:ad02	SE	Stockholm	Stockholm				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-07-26T23:45:43+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-08-23T20:48:53+00:00	Sharing	Opened a link (non-team member)	188.72.80.90	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-08-23T20:50:16+00:00	Sharing	Opened a link (non-team member)	188.72.80.90	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-13T19:55:42+00:00	Sharing	Opened a link (non-team member)	2001:9a8:0:5b::5	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-13T19:56:17+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:9a8:0:5b::5	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-13T19:56:29+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:9a8:0:5b::5	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_1600_2.7z", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_1600_2.7z**", "is_dir": false}
2018-09-13T20:15:45+00:00	Sharing	Opened a link (non-team member)	2001:4ba0:cafe:5e4::1	DE	Rostock	Mecklenburg-Vorpommern				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-13T21:29:46+00:00	Sharing	Opened a link (non-team member)	2001:4ba0:cafe:b1d::1	DE	Rostock	Mecklenburg-Vorpommern				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_1600_2.7z", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_1600_2.7z**", "is_dir": false}
2018-09-13T21:30:11+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:4ba0:cafe:b1d::1	DE	Rostock	Mecklenburg-Vorpommern				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_1600_2.7z", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_1600_2.7z**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-09-16T00:37:25+00:00	Sharing	Opened a link (non-team member)	46.243.239.119	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Veronica Duarte - Air Combat", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Veronica Duarte - Air Combat**", "is_dir": true}
2018-09-26T18:16:07+00:00	Sharing	Opened a link (non-team member)	92.63.103.241	RU	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-26T18:31:47+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-09-27T19:29:35+00:00	Sharing	Opened a link (non-team member)	213.5.69.49	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-01T04:20:21+00:00	Sharing	Opened a link (non-team member)	213.5.69.185	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-01T18:56:15+00:00	Sharing	Opened a link (non-team member)	172.94.19.71	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-02T21:08:23+00:00	Sharing	Opened a link (non-team member)	185.2.29.205	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-02T21:08:43+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.2.29.205	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR_PD.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**JF_PRR_PD.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-02T21:09:59+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	185.2.29.205	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_JF_20181002.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_JF_20181002.zip**", "is_dir": false}
2018-10-02T21:18:52+00:00	Sharing	Opened a link (non-team member)	195.201.21.137	DE	Berlin	Land Berlin				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-02T21:19:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	195.201.21.137	DE	Berlin	Land Berlin				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_JF_20181002.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_JF_20181002.zip**", "is_dir": false}
2018-10-02T21:25:14+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-07T00:01:50+00:00	Sharing	Opened a link (non-team member)	188.72.82.107	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-09T00:07:22+00:00	Sharing	Opened a link (non-team member)	185.2.31.254	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-10T04:47:22+00:00	Sharing	Opened a link (non-team member)	206.123.147.16	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-11T22:31:01+00:00	Sharing	Opened a link (non-team member)	206.123.147.30	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-11T23:37:56+00:00	Sharing	Opened a link (non-team member)	206.123.147.30	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-12T00:06:23+00:00	Sharing	Opened a link (non-team member)	206.123.147.30	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-12T00:13:21+00:00	Sharing	Opened a link (non-team member)	206.123.147.30	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-12T01:01:23+00:00	Sharing	Opened a link (non-team member)	206.123.147.30	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-12T09:24:20+00:00	Sharing	Opened a link (non-team member)	141.101.146.7	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T02:21:36+00:00	Sharing	Opened a link (non-team member)	188.72.80.103	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T02:21:47+00:00	Sharing	Opened a link (non-team member)	188.72.80.103	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-13T02:22:04+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.80.103	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}
2018-10-13T05:56:02+00:00	Sharing	Opened a link (non-team member)	217.170.199.85	NO	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T05:56:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	217.170.199.85	NO	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}
2018-10-13T06:51:37+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T06:52:12+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T06:52:59+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T06:53:36+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-13T06:54:41+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T06:55:03+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T06:55:42+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**JF_PRR20181012.zip**", "is_dir": false}
2018-10-13T17:03:51+00:00	Sharing	Opened a link (non-team member)	206.123.147.12	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T17:03:55+00:00	Sharing	Opened a link (non-team member)	206.123.147.12	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-13T17:04:19+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	206.123.147.12	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**JF_PRR20181012.zip**", "is_dir": false}
2018-10-13T21:30:22+00:00	Sharing	Opened a link (non-team member)	213.5.69.160	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-14T02:11:41+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	163.172.67.180	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}
2018-10-14T02:11:50+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	163.172.67.180	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}
2018-10-14T02:12:30+00:00	Sharing	Opened a link (non-team member)	163.172.67.180	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-14T02:12:34+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-14T02:13:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR20181012.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR20181012.zip", "is_dir": false}
2018-10-14T05:06:52+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-14T06:12:28+00:00	Sharing	Opened a link (non-team member)	185.24.218.179	PL	Katowice	Silesia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-14T06:40:57+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-16T23:08:55+00:00	Sharing	Opened a link (non-team member)	172.94.19.106	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-17T00:13:37+00:00	Sharing	Opened a link (non-team member)	172.94.19.106	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-18T22:14:22+00:00	Sharing	Opened a link (non-team member)	185.2.31.218	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-19T00:23:41+00:00	Sharing	Opened a link (non-team member)	185.2.31.218	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-22T19:09:05+00:00	Sharing	Opened a link (non-team member)	185.100.87.129	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-22T19:29:03+00:00	Sharing	Opened a link (non-team member)	213.5.69.19	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-22T22:20:17+00:00	Sharing	Opened a link (non-team member)	46.183.217.198	LV	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-23T16:48:16+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-23T19:32:37+00:00	Sharing	Opened a link (non-team member)	188.72.82.78	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-24T05:17:53+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-25T04:26:11+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-25T04:26:29+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-25T04:27:05+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "COF_comprehensive master plan of drainage_1996.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Drainage Master Plan/1996 Boyle/COF_comprehensive master plan of drainage_1996.pdf**", "is_dir": false}
2018-10-26T18:44:04+00:00	Sharing	Opened a link (non-team member)	213.5.69.31	NL	Unknown	Unknown		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-27T19:22:33+00:00	Sharing	Opened a link (non-team member)	185.2.31.200	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-27T22:56:51+00:00	Sharing	Opened a link (non-team member)	185.2.31.200	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:28:02+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:29:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:30:38+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:32:56+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR_2.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR_2.zip", "is_dir": false}
2018-10-30T21:33:27+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:33:44+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-30T21:34:25+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:34:41+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:36:10+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	81.17.27.138	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "JF_PRR_2.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/JF_PRR_2.zip", "is_dir": false}
2018-10-30T21:42:16+00:00	Sharing	Opened a link (non-team member)	2001:41d0:302:2000::158b	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:51:07+00:00	Sharing	Opened a link (non-team member)	2001:41d0:302:2000::158b	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T21:54:52+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T22:45:54+00:00	Sharing	Opened a link (non-team member)	185.56.80.242	SC	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T23:12:41+00:00	Sharing	Opened a link (non-team member)	185.2.29.211	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-10-31T18:21:35+00:00	Sharing	Opened a link (non-team member)	2a06:e80:1::10	SC	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-31T18:36:50+00:00	Sharing	Opened a link (non-team member)	179.43.134.156	CH	Zurich	Zurich				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-01T06:51:26+00:00	Sharing	Opened a link (non-team member)	51.38.69.128	GB	London	England				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-01T21:28:02+00:00	Sharing	Opened a link (non-team member)	93.115.86.8	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T03:14:55+00:00	Sharing	Opened a link (non-team member)	188.72.82.15	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T08:26:22+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T21:05:18+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T21:44:14+00:00	Sharing	Opened a link (non-team member)	188.72.82.73	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-06T21:44:50+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.82.73	NL	Amsterdam	North Holland		joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PPR_Cox.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PPR_Cox.zip**", "is_dir": false}
2018-11-06T22:46:16+00:00	Sharing	Opened a link (non-team member)	93.115.86.4	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-08T23:47:44+00:00	Sharing	Opened a link (non-team member)	188.72.82.57	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-08T23:48:34+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.82.57	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Lease Files.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Lease Files.zip**", "is_dir": false}
2018-11-10T18:42:44+00:00	Sharing	Opened a link (non-team member)	46.243.239.41	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-12T19:59:26+00:00	Sharing	Opened a link (non-team member)	188.72.80.50	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-13T21:41:17+00:00	Sharing	Opened a link (non-team member)	2001:985:7aa4::2	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-13T21:41:53+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2001:985:7aa4::2	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "GO 2018-66979 HITDA 48.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**NARCOTICS/GO 2018-66979 HITDA 48.pdf**", "is_dir": false}
2018-11-15T23:20:46+00:00	Sharing	Opened a link (non-team member)	93.115.86.9	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-15T23:21:39+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	93.115.86.9	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Request 2819 Officer_Activity - Original.xlsm", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Police/Request 2819 Officer_Activity - Original.xlsm**", "is_dir": false}
2018-11-15T23:22:05+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	93.115.86.9	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Request 2819 Officer Activity - Empty.xlsx", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Police/Request 2819 Officer Activity - Empty.xlsx**", "is_dir": false}
2018-11-16T04:29:53+00:00	Sharing	Opened a link (non-team member)	188.72.80.93	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-16T04:30:27+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.80.93	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "NARCOTICS", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**NARCOTICS**", "is_dir": true}
2018-11-16T20:29:39+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-16T21:51:00+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-16T21:54:00+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR 18-225 Replogle Responsive E-mails.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR 18-225 Replogle Responsive E-mails.pdf**", "is_dir": false}
2018-11-17T03:48:45+00:00	Sharing	Opened a link (non-team member)	188.72.80.85	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-17T03:51:12+00:00	Sharing	Opened a link (non-team member)	188.72.80.85	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-17T05:42:14+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::20	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-18T20:35:35+00:00	Sharing	Opened a link (non-team member)	188.72.80.83	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-19T20:19:40+00:00	Sharing	Opened a link (non-team member)	188.72.82.80	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-20T00:56:28+00:00	Sharing	Opened a link (non-team member)	93.115.86.8	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-20T21:17:36+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-24T06:34:04+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-24T22:10:51+00:00	Sharing	Opened a link (non-team member)	2a06:3000::120:3	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-26T21:14:33+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::13	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-27T21:24:40+00:00	Sharing	Opened a link (non-team member)	188.72.80.117	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-27T21:25:40+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.80.117	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Request 2819 Officer_Activity - Original.xlsm", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Police/Request 2819 Officer_Activity - Original.xlsm**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-27T21:25:58+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.80.117	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Request 2819 Officer Activity - Empty.xlsx", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Police/Request 2819 Officer Activity - Empty.xlsx**", "is_dir": false}
2018-11-27T22:56:01+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-28T00:42:22+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2300::11:c07	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-28T00:47:52+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2300::11:c07	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-28T01:01:42+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	217.182.244.60	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PPR_18_326_Curlee.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PPR_18_326_Curlee.zip**", "is_dir": false}
2018-11-28T01:24:03+00:00	Sharing	Opened a link (non-team member)	188.72.80.24	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-28T01:25:23+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.80.24	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PPR_18_326_Curlee.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PPR_18_326_Curlee.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-11-28T01:37:32+00:00	Sharing	Opened a link (non-team member)	188.72.80.24	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-29T00:14:14+00:00	Sharing	Opened a link (non-team member)	91.219.236.171	HU	Budapest	Budapest				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-29T19:41:46+00:00	Sharing	Opened a link (non-team member)	46.243.239.6	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-29T20:00:43+00:00	Sharing	Opened a link (non-team member)	2a00:c98:2030:a03e:2::a10	DE	Kleve	North Rhine-Westphalia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-29T21:38:23+00:00	Sharing	Opened a link (non-team member)	188.72.80.18	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-29T22:04:55+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-30T01:33:40+00:00	Sharing	Opened a link (non-team member)	188.72.80.44	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-30T03:11:02+00:00	Sharing	Opened a link (non-team member)	188.72.80.44	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-01T19:32:57+00:00	Sharing	Opened a link (non-team member)	46.243.239.94	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-03T23:36:12+00:00	Sharing	Opened a link (non-team member)	188.72.80.99	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-03T23:42:07+00:00	Sharing	Opened a link (non-team member)	163.172.132.199	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-04T04:40:45+00:00	Sharing	Opened a link (non-team member)	188.72.80.99	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-04T17:51:54+00:00	Sharing	Opened a link (non-team member)	2a06:3000::120:3	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-04T19:24:35+00:00	Sharing	Opened a link (non-team member)	188.72.82.46	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-04T21:27:10+00:00	Sharing	Opened a link (non-team member)	188.72.82.46	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-04T22:21:16+00:00	Sharing	Opened a link (non-team member)	188.72.80.49	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-05T18:54:19+00:00	Sharing	Opened a link (non-team member)	2605:e200:d111:1:225:90ff:fe24:3f9e	CA	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-06T19:52:26+00:00	Sharing	Opened a link (non-team member)	2001:678:7dc:134::dead:beef	RU	Krasnodar	Krasnodarskiy Kray				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-06T19:53:12+00:00	Sharing	Opened a link (non-team member)	2001:678:7dc:134::dead:beef	RU	Krasnodar	Krasnodarskiy Kray				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "1,2,3, conduit-pullbox-fiber APPROVED w comments.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**56019 Fiber/Submittals/1,2,3, conduit-pullbox-fiber APPROVED w comments.pdf**", "is_dir": false}
2018-12-06T20:08:54+00:00	Sharing	Opened a link (non-team member)	188.72.82.49	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-10T20:03:35+00:00	Sharing	Opened a link (non-team member)	141.101.146.77	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-10T22:10:30+00:00	Sharing	Opened a link (non-team member)	37.230.184.30	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-11T23:25:22+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:104:ae16:2dff:fe8c:6530	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "129 W Commonwealth - Graphics", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**129 W Commonwealth - Graphics**", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-11T23:29:10+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:106:f24d:a2ff:fe73:1544	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "1310 Sorrento Pl", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**1310 Sorrento Pl**", "is_dir": true}
2018-12-11T23:34:25+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:106:f24d:a2ff:fe73:1544	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix B", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix B**", "is_dir": true}
2018-12-12T00:48:40+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:104:ae16:2dff:fe8c:6530	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix A", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix A**", "is_dir": true}
2018-12-12T00:57:15+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:106:f24d:a2ff:fe73:1544	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix C", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix C**", "is_dir": true}
2018-12-12T01:04:29+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:105:3617:ebff:fee3:fe4f	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix D", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix D**", "is_dir": true}
2018-12-12T02:40:14+00:00	Sharing	Opened a link (non-team member)	141.101.146.33	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-12T02:40:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.33	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR 18-225 Replogle Responsive E-mails.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR 18-225 Replogle Responsive E-mails.pdf**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-12T02:42:16+00:00	Sharing	Opened a link (non-team member)	141.101.146.33	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix B", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix B**", "is_dir": true}
2018-12-12T21:39:59+00:00	Sharing	Opened a link (non-team member)	91.219.236.171	HU	Budapest	Budapest				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-13T15:21:03+00:00	Sharing	Opened a link (non-team member)	2a00:4ce0:4:106:f24d:a2ff:fe73:1544	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Appendix E", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**52588 BID/Appendix E**", "is_dir": true}
2018-12-15T00:35:13+00:00	Sharing	Opened a link (non-team member)	2001:bc8:472c:7a0c::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-17T05:07:36+00:00	Sharing	Opened a link (non-team member)	85.202.163.127	BE	Bruges	Flanders				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-17T18:05:08+00:00	Sharing	Opened a link (non-team member)	185.200.119.105	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-17T20:16:13+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-18T21:02:13+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-18T21:04:27+00:00	Sharing	Opened a link (non-team member)	62.210.71.205	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-19T05:11:27+00:00	Sharing	Opened a link (non-team member)	2a02:25b0:aaaa:aaaa:bfc5:605:d754:0	RU	Tambov	Tambovskaya Oblast'				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-20T21:49:55+00:00	Sharing	Opened a link (non-team member)	158.174.122.218	SE	Norrtaelje	Stockholm				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-21T20:28:22+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "1_Laguna Lake Files", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/1_Laguna Lake Files", "is_dir":
2018-12-21T20:28:27+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-22T02:03:49+00:00	Sharing	Opened a link (non-team member)	2a06:d380:0:3700::62	DK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-22T08:00:32+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:caff:71::e4da	MD	Chisinau	Chi»ôinƒÉu Municipality				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-22T20:30:37+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-23T08:17:20+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-26T22:36:29+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-26T22:38:11+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-26T22:42:12+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-27T18:26:27+00:00	Sharing	Opened a link (non-team member)	206.123.147.114	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-27T23:54:29+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-28T20:07:41+00:00	Sharing	Opened a link (non-team member)	91.219.236.189	HU	Budapest	Budapest				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2018-12-28T21:35:02+00:00	Sharing	Opened a link (non-team member)	104.218.63.75	CA	Burnaby	British Columbia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-28T23:52:22+00:00	Sharing	Opened a link (non-team member)	213.5.69.8	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-29T17:25:26+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-12-29T23:08:55+00:00	Sharing	Opened a link (non-team member)	91.250.241.241	ES	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-02T19:27:44+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-02T19:28:02+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-02T19:28:19+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-02T21:28:15+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-03T09:40:43+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-04T01:38:44+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-04T01:40:21+00:00	Sharing	Opened a link (non-team member)	195.189.96.147	LT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-05T17:58:36+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-05T23:30:57+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-06T08:14:40+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-07T16:29:39+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-07T19:01:05+00:00	Sharing	Opened a link (non-team member)	193.107.85.62	IS	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-07T19:38:47+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::8	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-07T23:31:37+00:00	Sharing	Opened a link (non-team member)	2001:41d0:52:500::51a	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-07T23:52:47+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2000::2317	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-08T01:45:55+00:00	Sharing	Opened a link (non-team member)	185.200.119.105	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-08T21:58:11+00:00	Sharing	Opened a link (non-team member)	185.34.33.2	FR	Longessaigne	Auvergne-Rhone-Alpes				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-08T23:33:10+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-08T23:44:43+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T00:36:04+00:00	Sharing	Opened a link (non-team member)	51.15.234.90	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-09T00:36:42+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	51.15.234.90	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Veronica Duarte.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Veronica Duarte.zip**", "is_dir": false}
2019-01-09T04:32:13+00:00	Sharing	Opened a link (non-team member)	85.202.163.127	BE	Bruges	Flanders				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T04:32:31+00:00	Sharing	Opened a link (non-team member)	85.202.163.127	BE	Bruges	Flanders				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019.zip**", "is_dir": false}
2019-01-09T04:32:47+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	85.202.163.127	BE	Bruges	Flanders				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019.zip**", "is_dir": false}
2019-01-09T06:33:13+00:00	Sharing	Opened a link (non-team member)	2a02:25b0:aaaa:aaaa:bfc5:605:d754:0	RU	Tambov	Tambovskaya Oblast'				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T17:28:00+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T17:28:18+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.pst", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019/PRRS01082019.pst**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-09T17:28:37+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.pst", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRRS01082019/PRRS01082019.pst", "is_dir": false}
2019-01-09T17:34:51+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T17:42:52+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:11d0:aff0::2932	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T17:55:03+00:00	Sharing	Opened a link (non-team member)	37.187.96.78	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File
2019-01-09T18:55:35+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T18:55:54+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRRS01082019.zip", "is_dir": false}
2019-01-09T19:07:09+00:00	Sharing	Opened a link (non-team member)	195.189.96.147	LT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-09T19:12:08+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T19:12:36+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019**", "is_dir": true}
2019-01-09T19:57:35+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T20:02:56+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T20:09:51+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T20:13:01+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-09T23:30:23+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-10T00:40:32+00:00	Sharing	Opened a link (non-team member)	185.2.29.184	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-10T00:55:01+00:00	Sharing	Opened a link (non-team member)	185.2.29.184	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-10T19:01:57+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-10T19:02:43+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019.zip**", "is_dir": false}
2019-01-10T19:02:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019.zip**", "is_dir": false}
2019-01-10T20:53:38+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-10T20:57:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01092019_all.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01092019_all.zip**", "is_dir": false}
2019-01-10T20:58:10+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01092019_all.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01092019_all.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-11T03:24:20+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-12T21:52:26+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-12T21:57:33+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "COF_Kevin.docx", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Kevin/COF_Kevin.docx**", "is_dir": false}
2019-01-13T04:20:57+00:00	Sharing	Opened a link (non-team member)	91.250.241.241	ES	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T01:38:49+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T01:39:22+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01092019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01092019.zip**", "is_dir": false}
2019-01-15T01:39:46+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01082019.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01082019.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-15T05:15:05+00:00	Sharing	Opened a link (non-team member)	2a06:3000::120:3	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T22:48:20+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::20	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T22:56:25+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T22:56:48+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-15T22:56:51+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-15T23:04:34+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-15T23:04:47+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-15T23:04:52+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-15T23:04:58+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-15T23:05:02+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-16T00:45:45+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-16T05:29:28+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4728:8400::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-16T22:25:11+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	144.217.161.119	CA	Beauharnois	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-01-16T23:22:19+00:00	Sharing	Opened a link (non-team member)	198.40.54.178	CN	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-16T23:23:56+00:00	Sharing	Opened a link (non-team member)	198.40.54.178	CN	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-16T23:25:16+00:00	Sharing	Opened a link (non-team member)	198.40.54.178	CN	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-17T00:09:24+00:00	Sharing	Opened a link (non-team member)	2a06:d380:0:3700::62	DK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-17T01:04:36+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-17T09:05:11+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-17T18:47:18+00:00	Sharing	Opened a link (non-team member)	185.200.119.105	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-17T19:43:23+00:00	Sharing	Opened a link (non-team member)	185.200.119.105	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T00:07:44+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-18T00:08:05+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Fullerton Municipal Airport.mdb", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Airport Database/**Fullerton Municipal Airport.mdb**", "is_dir": false}
2019-01-18T00:28:01+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::9	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T18:52:56+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:caff:127::e359	MD	Chisinau	Chi»ôinƒÉu Municipality				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T19:06:46+00:00	Sharing	Opened a link (non-team member)	2a00:1dc0:caff:14e::9ecd	MD	Chisinau	Chi»ôinƒÉu Municipality				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T20:51:11+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T20:59:10+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-18T21:39:43+00:00	Sharing	Opened a link (non-team member)	2a01:4f9:c010:8fb::bee	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-18T21:48:34+00:00	Sharing	Opened a link (non-team member)	2a01:4f9:c010:8fb::bee	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-19T06:42:24+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T18:30:33+00:00	Sharing	Opened a link (non-team member)	37.230.184.67	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T20:46:40+00:00	Sharing	Opened a link (non-team member)	2001:985:7aa4::2	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T21:08:46+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T21:14:36+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T21:59:02+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T22:36:29+00:00	Sharing	Opened a link (non-team member)	2001:bc8:3c96:200::74	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-21T23:15:24+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T23:56:12+00:00	Sharing	Opened a link (non-team member)	104.218.63.73	CA	Burnaby	British Columbia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-21T23:57:57+00:00	Sharing	Opened a link (non-team member)	104.218.63.73	CA	Burnaby	British Columbia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-22T01:07:11+00:00	Sharing	Opened a link (non-team member)	213.5.69.184	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-23T05:19:23+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-24T07:03:39+00:00	Sharing	Opened a link (non-team member)	185.169.197.106	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-24T07:50:47+00:00	Sharing	Opened a link (non-team member)	2001:41d0:1008:26d8::150	FR	Labege	Occitanie				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-24T07:52:29+00:00	Sharing	Opened a link (non-team member)	2001:41d0:1008:26d8::150	FR	Labege	Occitanie				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-24T21:52:47+00:00	Sharing	Opened a link (non-team member)	2a02:418:6017::148	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-24T21:55:07+00:00	Sharing	Opened a link (non-team member)	2a02:418:6017::148	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-24T23:50:16+00:00	Sharing	Opened a link (non-team member)	185.234.217.241	IE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-25T07:03:04+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-30T16:27:50+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-30T22:11:14+00:00	Sharing	Opened a link (non-team member)	213.226.68.31	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-30T22:16:14+00:00	Sharing	Opened a link (non-team member)	213.226.68.31	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-30T22:18:48+00:00	Sharing	Opened a link (non-team member)	213.226.68.31	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-01-31T17:45:28+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:2::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-04T17:45:57+00:00	Sharing	Opened a link (non-team member)	51.75.66.250	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-04T22:17:26+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-05T00:31:19+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::18	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-05T00:38:48+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::18	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-05T05:42:42+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-05T20:51:19+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-06T18:19:49+00:00	Sharing	Opened a link (non-team member)	2a02:27ab:0:2::5e2	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-02-06T23:25:04+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::20	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T05:51:45+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T08:26:03+00:00	Sharing	Opened a link (non-team member)	81.17.27.130	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T08:34:29+00:00	Sharing	Opened a link (non-team member)	81.17.27.130	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T21:37:54+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::4	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T22:31:35+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T23:02:07+00:00	Sharing	Opened a link (non-team member)	2001:bc8:472c:7a0c::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-07T23:04:30+00:00	Sharing	Opened a link (non-team member)	2001:bc8:472c:7a0c::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-02-08T00:36:59+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-08T02:05:48+00:00	Sharing	Opened a link (non-team member)	37.230.184.70	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-08T19:19:01+00:00	Sharing	Opened a link (non-team member)	2a01:4f8:140:4014:13a6:61ae:b83e:e260	DE	Heidelberg	Baden-Wv°rttemberg Region				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-09T01:02:32+00:00	Sharing	Opened a link (non-team member)	37.187.96.78	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-13T07:22:49+00:00	Sharing	Opened a link (non-team member)	198.73.51.73	CA	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-13T17:14:46+00:00	Sharing	Opened a link (non-team member)	103.236.201.27	ID	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-13T21:44:07+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::17	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-13T23:42:34+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::17	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-02-14T05:21:36+00:00	Sharing	Opened a link (non-team member)	104.218.63.73	CA	Burnaby	British Columbia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-15T00:39:06+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:1::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-15T16:45:59+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::9	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-15T21:43:15+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-15T21:43:16+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-16T06:41:34+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-16T21:39:14+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-19T16:39:02+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-02-19T19:50:03+00:00	Sharing	Opened a link (non-team member)	37.230.184.124	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-19T23:35:29+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-20T00:04:03+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-20T17:09:18+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-20T21:47:40+00:00	Sharing	Opened a link (non-team member)	2a03:b0c0:3:d0::d9a:3001	DE	Frankfurt am Main	Hesse				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-21T00:30:13+00:00	Sharing	Opened a link (non-team member)	212.47.226.52	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-21T00:30:14+00:00	Sharing	Opened a link (non-team member)	212.47.226.52	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-21T17:11:53+00:00	Sharing	Opened a link (non-team member)	212.47.248.66	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-02-21T19:07:40+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-21T22:56:44+00:00	Sharing	Opened a link (non-team member)	51.75.253.147	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-23T18:39:15+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::13	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-24T02:13:22+00:00	Sharing	Opened a link (non-team member)	2a0c:b807:8000:c93a:ff51:90ac:0:153a	UA	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-26T19:08:14+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-26T19:08:50+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-27T00:09:18+00:00	Sharing	Opened a link (non-team member)	190.164.230.184	CL	ViV±a del Mar	Region de Valparaiso				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-02-28T16:35:08+00:00	Sharing	Opened a link (non-team member)	185.220.101.52	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-01T20:24:14+00:00	Sharing	Opened a link (non-team member)	185.220.101.52	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-01T22:34:07+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::13	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-02T06:25:15+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::20	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-02T16:39:38+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-04T00:15:13+00:00	Sharing	Opened a link (non-team member)	2a02:418:6017::148	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-04T22:25:34+00:00	Sharing	Opened a link (non-team member)	51.15.128.3	FR	Paris	Vélé-de-France				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-05T19:42:04+00:00	Sharing	Opened a link (non-team member)	37.230.184.23	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-05T19:42:14+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	37.230.184.23	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "AxonPRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**AxonPRR.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-06T00:28:28+00:00	Sharing	Opened a link (non-team member)	141.101.146.22	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-06T00:49:07+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4728:1203::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-07T18:30:02+00:00	Sharing	Opened a link (non-team member)	37.230.184.29	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-07T23:55:30+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-09T00:16:40+00:00	Sharing	Opened a link (non-team member)	51.15.252.1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-09T17:51:48+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-11T16:23:55+00:00	Sharing	Opened a link (non-team member)	51.15.128.3	FR	Paris	Vélе-de-France				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-11T21:41:10+00:00	Sharing	Opened a link (non-team member)	2a02:418:6017::148	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-12T17:18:12+00:00	Sharing	Opened a link (non-team member)	51.15.252.1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-13T01:14:11+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-13T18:23:59+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::20	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-14T17:13:59+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-14T17:22:57+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-14T18:05:41+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::17	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-14T20:43:06+00:00	Sharing	Opened a link (non-team member)	37.230.184.102	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-15T05:55:45+00:00	Sharing	Opened a link (non-team member)	51.75.253.147	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-16T07:51:11+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-18T19:23:05+00:00	Sharing	Opened a link (non-team member)	51.15.252.1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-19T17:27:22+00:00	Sharing	Opened a link (non-team member)	81.17.27.134	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-19T17:33:22+00:00	Sharing	Opened a link (non-team member)	81.17.27.134	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-20T23:06:58+00:00	Sharing	Opened a link (non-team member)	192.99.247.1	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-21T01:41:05+00:00	Sharing	Opened a link (non-team member)	2a0c:b807:8000:c93a:ff51:90ac:0:1b88	UA	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-21T20:41:21+00:00	Sharing	Opened a link (non-team member)	212.47.226.52	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-21T20:57:03+00:00	Sharing	Opened a link (non-team member)	37.230.184.113	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-25T20:22:21+00:00	Sharing	Opened a link (non-team member)	213.5.69.8	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-26T04:57:12+00:00	Sharing	Opened a link (non-team member)	185.10.68.148	SC	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-27T05:22:15+00:00	Sharing	Opened a link (non-team member)	104.37.2.46	PR	San Juan	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-27T05:22:39+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	104.37.2.46	PR	San Juan	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_19-134_data@thehourlystruggle.com.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_19-134_data@thehourlystruggle.com.zip**", "is_dir": false}
2019-03-28T16:26:26+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::1a	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-28T23:39:09+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-03-30T22:53:05+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4728:1203::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-03-31T21:14:01+00:00	Sharing	Opened a link (non-team member)	185.255.112.148	CH	Zurich	Zurich				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-01T19:46:22+00:00	Sharing	Opened a link (non-team member)	185.220.101.54	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-01T19:46:28+00:00	Sharing	Opened a link (non-team member)	185.220.101.54	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-01T20:53:21+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-01T21:29:48+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-02T23:31:20+00:00	Sharing	Opened a link (non-team member)	37.230.184.25	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-03T05:45:24+00:00	Sharing	Opened a link (non-team member)	5.3.163.124	RU	Voronezh	Voronezhskaya Oblast'				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-03T19:08:09+00:00	Sharing	Opened a link (non-team member)	2a02:418:6017::148	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-03T19:48:55+00:00	Sharing	Opened a link (non-team member)	2001:985:7aa4::2	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-04T18:55:32+00:00	Sharing	Opened a link (non-team member)	185.234.219.111	IE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-04T20:08:35+00:00	Sharing	Opened a link (non-team member)	185.200.119.105	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-04T22:55:33+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-05T00:02:45+00:00	Sharing	Opened a link (non-team member)	51.15.128.3	FR	Paris	Vélе-de-France				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-05T18:40:29+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-05T19:53:37+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-08T22:37:22+00:00	Sharing	Opened a link (non-team member)	37.230.184.73	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-11T15:47:13+00:00	Sharing	Opened a link (non-team member)	2001:41d0:1008:26d8::150	FR	Labege	Occitanie				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T16:30:29+00:00	Sharing	Opened a link (non-team member)	51.15.56.18	NL	Haarlem	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T19:34:54+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T19:37:55+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T23:28:59+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T23:38:20+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-11T23:38:44+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-12T15:25:08+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::17	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

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Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-12T16:55:48+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4728:1203::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-12T19:08:27+00:00	Sharing	Opened a link (non-team member)	2001:920:198c:83c:6368:537d:f8b4:5555	DE	Dvºsseldorf	North Rhine-Westphalia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-12T20:10:37+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-13T00:41:35+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-13T17:42:39+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-14T06:34:32+00:00	Sharing	Opened a link (non-team member)	2a06:3000::120:3	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-15T16:01:43+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::6	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-15T18:09:55+00:00	Sharing	Opened a link (non-team member)	185.147.237.8	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-15T19:32:15+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-16T03:05:00+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-16T22:28:46+00:00	Sharing	Opened a link (non-team member)	2400:8902::f03c:91ff:fe6b:3903	JP	Tokyo	Tokyo				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-16T23:15:17+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::20	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-17T19:28:18+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::a	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-17T21:29:50+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-18T17:21:57+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-19T00:34:16+00:00	Sharing	Opened a link (non-team member)	2a03:b0c0:2:d0::db1:4001	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-19T00:46:48+00:00	Sharing	Opened a link (non-team member)	213.5.70.231	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-19T00:49:33+00:00	Sharing	Opened a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-19T00:49:41+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PR19-171VD_1_2.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PR19-171VD_1_2.zip**", "is_dir": false}
2019-04-19T00:50:12+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "2017 (12-07-17) Fullerton Municipal Airport Fixed Base Operator Lease - Han.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_H21 Leases/2017 (12-07-17) Fullerton Municipal Airport Fixed Base Operator Lease - Han.pdf**", "is_dir": false}
2019-04-19T00:50:19+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "2011 (06-01-11) FBO Lease Agreement - Air Combat USA.pdf", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_H21 Leases/2011 (06-01-11) FBO Lease Agreement - Air Combat USA.pdf**", "is_dir": false}
2019-04-19T00:50:25+00:00	Sharing	Opened a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_H21 Leases", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_H21 Leases**", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-19T00:50:34+00:00	Sharing	Opened a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-19T16:38:30+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-20T23:31:32+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::19	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-22T17:22:17+00:00	Sharing	Opened a link (non-team member)	2001:bf0:666::666	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-22T22:52:13+00:00	Sharing	Opened a link (non-team member)	185.232.64.119	RO	Timi»ôoara	Judetul Timis				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-23T16:54:21+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-25T03:50:31+00:00	Sharing	Opened a link (non-team member)	163.172.12.160	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-25T03:55:02+00:00	Sharing	Opened a link (non-team member)	163.172.12.160	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-04-25T20:20:26+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:1::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-26T00:51:34+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-27T05:19:21+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-28T17:00:48+00:00	Sharing	Opened a link (non-team member)	2a06:3000::120:60	GB	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-30T00:18:33+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-30T22:51:22+00:00	Sharing	Opened a link (non-team member)	213.5.69.150	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-04-30T23:24:10+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-01T18:23:42+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-02T20:33:51+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-06T22:24:56+00:00	Sharing	Opened a link (non-team member)	185.100.87.129	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-08T19:56:09+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-08T21:00:47+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-08T21:01:19+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-10T18:36:22+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::20	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-10T21:47:43+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-10T21:56:52+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-10T22:00:59+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-10T22:01:11+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "pr1919 - Josh Ferguson.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**pr1919 - Josh Ferguson.zip**", "is_dir": false}
2019-05-11T18:55:28+00:00	Sharing	Opened a link (non-team member)	141.101.146.119	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-11T20:04:28+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-13T00:23:11+00:00	Sharing	Opened a link (non-team member)	2620:132:300c:c01d::8	CA	Winnipeg	Manitoba				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-13T01:04:11+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4728:310d::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-13T23:10:02+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-13T23:11:07+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_19-134_data@thehourlystruggle.com.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_19-134_data@thehourlystruggle.com.zip**", "is_dir": false}
2019-05-13T23:36:36+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-13T23:36:44+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "pr1919 - Josh Ferguson.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**pr1919 - Josh Ferguson.zip**", "is_dir": false}
2019-05-13T23:36:47+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_19-134_data@thehourlystruggle.com.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_19-134_data@thehourlystruggle.com.zip**", "is_dir": false}
2019-05-13T23:36:52+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "pr1919 - Josh Ferguson.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**pr1919 - Josh Ferguson.zip**", "is_dir": false}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-13T23:36:58+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_19-134_data@thehourlystruggle.com.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_19-134_data@thehourlystruggle.com.zip**", "is_dir": false}
2019-05-14T22:54:16+00:00	Sharing	Opened a link (non-team member)	2a02:ec0:209:10::4	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-15T05:28:56+00:00	Sharing	Opened a link (non-team member)	185.100.87.129	RO	Bucharest	Bucuresti				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-15T18:13:39+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::16	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-15T18:13:44+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::16	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-15T23:53:01+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2000::2317	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-16T05:14:43+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-16T05:24:32+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-16T20:02:28+00:00	Sharing	Opened a link (non-team member)	2001:41d0:404:200::1124	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-16T20:07:09+00:00	Sharing	Opened a link (non-team member)	2001:41d0:404:200::1124	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-16T20:31:15+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-16T20:39:04+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::8	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-17T00:50:42+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-17T00:50:50+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-17T01:29:51+00:00	Sharing	Opened a link (non-team member)	2001:41d0:302:2200::4673	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-17T18:38:30+00:00	Sharing	Opened a link (non-team member)	2605:e200:d111:1:225:90ff:fe24:3f9e	CA	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-17T21:30:40+00:00	Sharing	Opened a link (non-team member)	2a00:1768:1001:21::32a3:201a	NL	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-18T21:50:09+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2300::11:c07	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-19T02:09:11+00:00	Sharing	Opened a link (non-team member)	193.187.91.88	SE	Gothenburg	Vv§stra Gvðtaland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-20T05:04:43+00:00	Sharing	Opened a link (non-team member)	185.2.29.184	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-21T05:34:02+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-21T16:59:58+00:00	Sharing	Opened a link (non-team member)	2001:41d0:302:2200::4673	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-22T17:23:34+00:00	Sharing	Opened a link (non-team member)	2a00:1298:8011:212::165	SK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-23T17:51:35+00:00	Sharing	Opened a link (non-team member)	2001:41d0:52:100::112a	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-23T18:16:38+00:00	Sharing	Opened a link (non-team member)	2001:bc8:472c:d10c::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-24T23:20:05+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-25T01:51:24+00:00	Sharing	Opened a link (non-team member)	2001:678:a40:7001:2::c ccc	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-26T04:54:42+00:00	Sharing	Opened a link (non-team member)	195.181.174.163	DE	Frankfurt am Main	Hesse				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-27T18:12:41+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::13	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-28T20:50:27+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-28T20:53:46+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-05-29T17:16:37+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::18	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-29T17:16:44+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::18	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-29T19:27:40+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-29T20:14:56+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-30T00:51:57+00:00	Sharing	Opened a link (non-team member)	2a03:b0c0:2:d0::db1:4001	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-30T17:26:24+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-05-30T21:59:55+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::19	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-01T01:40:16+00:00	Sharing	Opened a link (non-team member)	2c0f:f930:0:3::221	LR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-01T17:05:20+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-01T17:06:11+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T04:51:38+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::13	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T15:50:55+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c::25	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T18:12:25+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T18:18:57+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::7	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T23:28:48+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:439c::110	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-03T23:37:27+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:439c::110	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-04T01:16:55+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2000::2317	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-04T02:58:47+00:00	Sharing	Opened a link (non-team member)	141.101.146.83	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-05T04:37:11+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:1259::	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-05T05:32:41+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:2::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-05T16:32:05+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-05T23:48:19+00:00	Sharing	Opened a link (non-team member)	2001:bf0:666::666	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-05T23:48:24+00:00	Sharing	Opened a link (non-team member)	2001:bf0:666::666	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T23:15:42+00:00	Sharing	Opened a link (non-team member)	178.175.132.214	Unknown	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-06T23:16:46+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	178.175.132.214	Unknown	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Pro Card 5-29-19.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR Pro Card 5-29-19.zip**", "is_dir": false}
2019-06-07T00:00:45+00:00	Sharing	Opened a link (non-team member)	141.101.146.87	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-07T00:01:13+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.87	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_19-134_data@thehourlystruggle.com.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_19-134_data@thehourlystruggle.com.zip**", "is_dir": false}
2019-06-07T00:07:03+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.87	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}
2019-06-07T18:21:24+00:00	Sharing	Opened a link (non-team member)	141.101.146.56	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-07T21:07:21+00:00	Sharing	Opened a link (non-team member)	2a06:d380:0:3700::63	DK	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-08T00:34:06+00:00	Sharing	Opened a link (non-team member)	2001:67c:2608::1	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-08T20:04:47+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::6	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-10T23:22:14+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-10T23:22:47+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "19-135 Datathehourlystruggle.com", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**19-135 Datathehourlystruggle.com**", "is_dir": true}
2019-06-10T23:27:20+00:00	Sharing	Opened a link (non-team member)	95.174.67.59	NL	Amsterdam	North Holland				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-11T18:55:04+00:00	Sharing	Opened a link (non-team member)	141.101.146.99	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-12T04:57:46+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::15	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-12T21:39:16+00:00	Sharing	Opened a link (non-team member)	2001:bc8:4700:2300::4:21b	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-13T01:43:44+00:00	Sharing	Opened a link (non-team member)	141.101.146.111	NO	Oslo	Oslo County				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-13T02:22:16+00:00	Sharing	Opened a link (non-team member)	176.10.99.200	CH	Hunenberg	Zug				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-13T07:00:21+00:00	Sharing	Opened a link (non-team member)	2001:920:198c:83c:636 8:537d:f8b4:5555	DE	DVºsseldorf	North Rhine-Westphalia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-13T19:02:59+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::1a	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-13T22:05:19+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::14	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-14T08:20:46+00:00	Sharing	Opened a link (non-team member)	2001:67c:289c:3::77	SE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "19-135 Datathehourlystruggle.com", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**19-135 Datathehourlystruggle.com**", "is_dir": true}
2019-06-15T04:34:41+00:00	Sharing	Opened a link (non-team member)	2a00:c98:2030:a03e:2:: a10	DE	Kleve	North Rhine-Westphalia				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-15T18:57:52+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:2::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-16T03:53:37+00:00	Sharing	Opened a link (non-team member)	2001:620:20d0::24	CH	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-17T19:44:05+00:00	Sharing	Opened a link (non-team member)	2001:4ba0:fff9:160:dead:beef:ca1f:1337	DE	Murg	Baden-Wºrttemberg Region				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-17T20:17:07+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::16	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-17T22:31:04+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c1::4	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-17T23:24:03+00:00	Sharing	Opened a link (non-team member)	2a03:e600:100::12	AT	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-20T01:01:12+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:1::1	DE	Unknown	Unknown	tor			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-21T06:26:43+00:00	Sharing	Opened a link (non-team member)	2a0b:f4c0:16c:1::1	DE	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-21T18:06:07+00:00	Sharing	Opened a link (non-team member)	2001:41d0:404:200::1124	FR	Unknown	Unknown				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Foreign Access to Dropbox

Time	Event category	Event type	IP address	Country	City	Region		Name	Email	Info
2019-06-21T21:28:46+00:00	Sharing	Opened a link (non-team member)	2607:5300:203:1259::	CA	Montreal	Quebec				{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

EXHIBIT B

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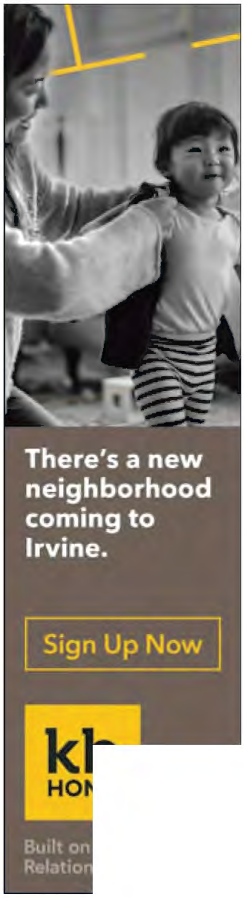

IP Details for 58.69.192.179

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

58.69.192.179 Lookup IP Address

Details for 58.69.192.179

IP: 58.69.192.179
Decimal: 977649843
Hostname: 58.69.192.179.static.pldt.net
ASN: 9299
ISP: Philippine Long Distance Telephone
Organization: Philippine Long Distance Telephone
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Province of Surigao del Norte
City: Surigao City
Latitude: 9.7839 (9° 47′ 2.04″ N)
Longitude: 125.4889 (125° 29′ 20.04″ E)
Postal Code: 8400

Geolocation Map

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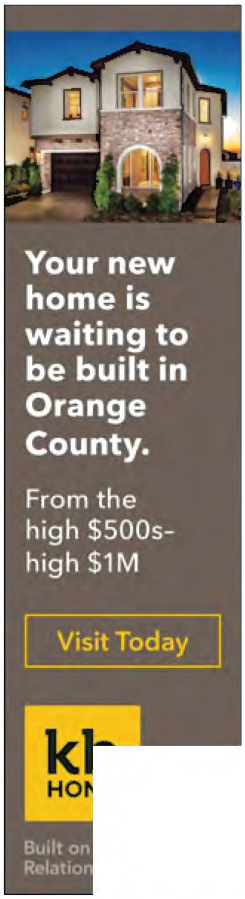

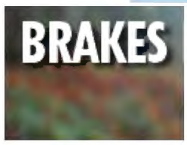

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IP Details for 112.198.77.14

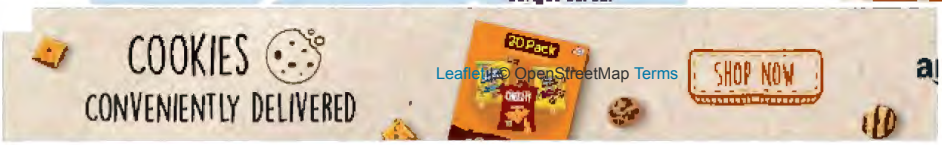
This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

112.198.77.14 Lookup IP Address

Details for 112.198.77.14

IP: 112.198.77.14
Decimal: 1892044046
Hostname: sjn.httpint2.globe.com.ph
ASN: 4775
ISP: Globe Mobile
Organization: Globe Mobile
Services: None detected
Type: Wireless Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: San Juan
Latitude: 14.5954 (14° 35′ 43.44″ N)
Longitude: 121.0258 (121° 1′ 32.88″ E)
Postal Code: 0410

Geolocation Map



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IP Details for 112.198.78.84

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

112.198.78.84 Lookup IP Address

Details for 112.198.78.84

IP: 112.198.78.84
Decimal: 1892044372
Hostname: sjn.httpint.globe.com.ph
ASN: 4775
ISP: Globe Mobile
Organization: Globe Mobile
Services: None detected
Type: Wireless Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5502 (14° 33′ 0.72″ N)
Longitude: 121.0401 (121° 2′ 24.36″ E)
Postal Code: 1214

Geolocation Map

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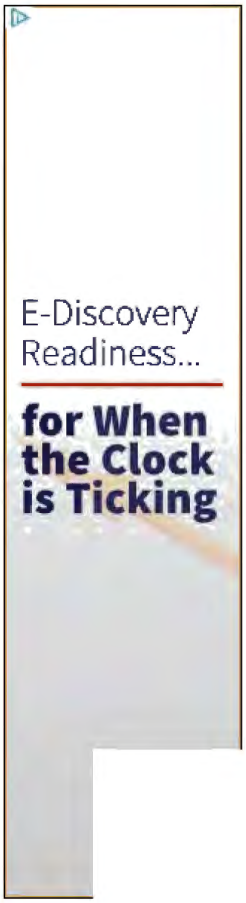

IP Details for 112.198.101.24

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

112.198.101.24 Lookup IP Address

Details for 112.198.101.24

IP: 112.198.101.24
Decimal: 1892050200
Hostname: tlc.httpint.globe.com.ph
ASN: 132199
ISP: Globe Mobile
Organization: Globe Mobile
Services: None detected
Type: Wireless Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Quezon City
Latitude: 14.6477 (14° 38′ 51.72″ N)
Longitude: 121.0493 (121° 2′ 57.48″ E)
Postal Code: 0860

Geolocation Map

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IP Details for 112.209.42.151

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

112.209.42.151 Lookup IP Address

Details for 112.209.42.151

IP: 112.209.42.151
Decimal: 1892756119
Hostname: 112.209.42.151.pldt.net
ASN: 9299
ISP: Philippine Long Distance Telephone
Organization: Philippine Long Distance Telephone
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Pasig
Latitude: 14.5732 (14° 34′ 23.52″ N)
Longitude: 121.0697 (121° 4′ 10.92″ E)
Postal Code: 1600

Geolocation Map

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How To Spot Someone Unfaithful

TruthFinder OPEN

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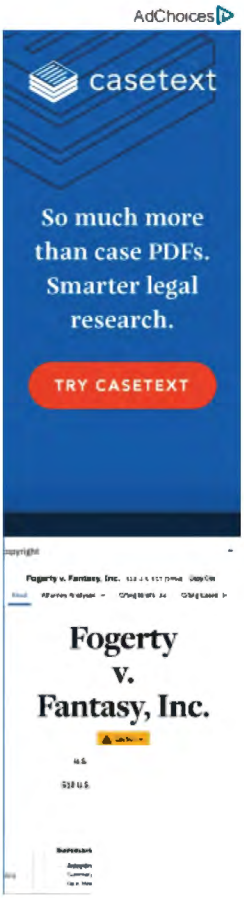

IP Details for 124.106.19.250

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

124.106.19.250 Lookup IP Address

Details for 124.106.19.250

IP: 124.106.19.250
Decimal: 2087326714
Hostname: 124.106.19.250
ASN: 9299
ISP: Philippine Long Distance Telephone
Organization: Philippine Long Distance Telephone
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5683 (14° 34′ 5.88″ N)
Longitude: 121.0478 (121° 2′ 52.08″ E)
Postal Code: 1214

Geolocation Map

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IP Details for 130.105.200.15

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.200.15 Lookup IP Address

Details for 130.105.200.15

IP: 130.105.200.15
Decimal: 2187970575
Hostname: 130.105.200.15
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5477 (14° 32′ 51.72″ N)
Longitude: 121.0613 (121° 3′ 40.68″ E)
Postal Code: 1217

Geolocation Map

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IP Details for 130.105.200.134

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.200.134 Lookup IP Address

Details for 130.105.200.134

IP: 130.105.200.134
Decimal: 2187970694
Hostname: 130.105.200.134
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5477 (14° 32′ 51.72″ N)
Longitude: 121.0613 (121° 3′ 40.68″ E)
Postal Code: 1217

Save 85% Save 57% Save 60%
Save 80% Save 44% Save 83%

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IP Details for 130.105.200.139

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.200.139 Lookup IP Address

Details for 130.105.200.139

IP: 130.105.200.139
Decimal: 2187970699
Hostname: 130.105.200.139
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5477 (14° 32′ 51.72″ N)
Longitude: 121.0613 (121° 3′ 40.68″ E)
Postal Code: 1217

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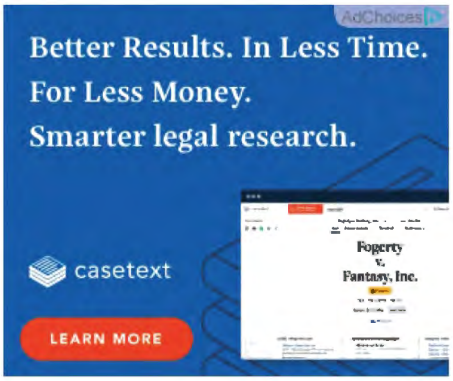
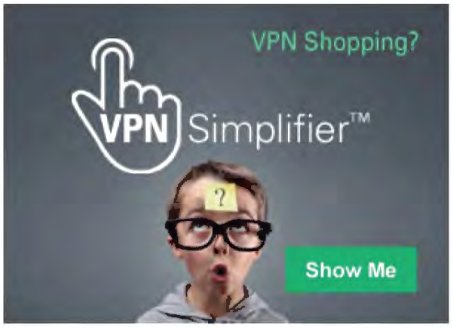
WiFiBlastShop.com





WhatIsMyIPAddress.com

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IP Details for 130.105.200.140

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

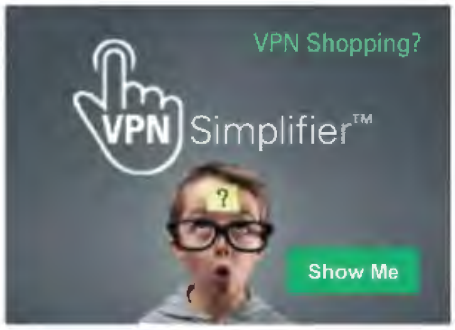
130.105.200.140 Lookup IP Address

Details for 130.105.200.140

IP: 130.105.200.140
Decimal: 2187970700
Hostname: 130.105.200.140
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5477 (14° 32′ 51.72″ N)
Longitude: 121.0613 (121° 3′ 40.68″ E)
Postal Code: 1217

Geolocation Map

Leaflet | © OpenStreetMap



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IP Details for 130.105.201.40

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.201.40 Lookup IP Address

Details for 130.105.201.40

IP: 130.105.201.40
Decimal: 2187970856
Hostname: 130.105.201.40
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Manila
Latitude: 14.6019 (14° 36′ 6.84″ N)
Longitude: 120.9896 (120° 59′ 22.56″ E)
Postal Code: 1006

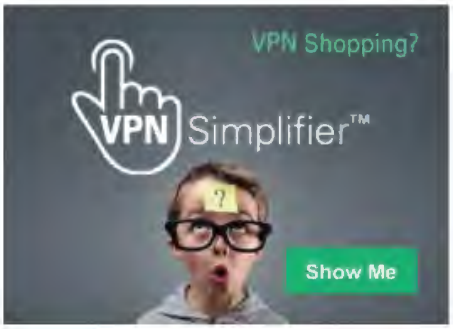
Geolocation Map

Leaflet | © OpenStreetMap Terms

Ad

Date Asian Women Near You

Date Asian Singles Near U OPEN



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The all-new Galaxy A50
Made for real moments
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IP Details for 130.105.201.49

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.201.49 Lookup IP Address

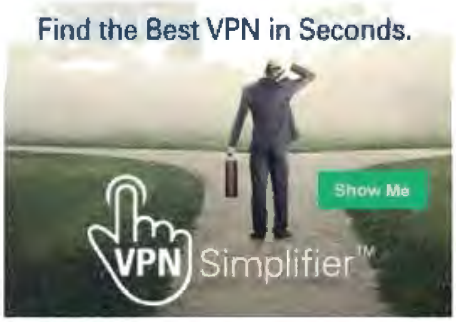
Details for 130.105.201.49

IP: 130.105.201.49
Decimal: 2187970865
Hostname: 130.105.201.49
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Manila
Latitude: 14.6019 (14° 36′ 6.84″ N)
Longitude: 120.9896 (120° 59′ 22.56″ E)
Postal Code: 1006

Geolocation Map

Leaflet | © OpenStreetMap Terms

The all-new Galaxy A50
Made for real moments
$349.99



The all-new Galaxy A50
Made for real moments

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IP Details for 130.105.201.137

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130.105.201.137 Lookup IP Address

Date Asian Women Near You
Date Asian Singles Near U OPEN

Details for 130.105.201.137

IP: 130.105.201.137
Decimal: 2187970953
Hostname: 130.105.201.137
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Manila
Latitude: 14.6019 (14° 36′ 6.84″ N)
Longitude: 120.9896 (120° 59′ 22.56″ E)
Postal Code: 1006

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Geolocation Map

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IP Details for 130.105.201.200

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.201.200 Lookup IP Address

Details for 130.105.201.200

IP: 130.105.201.200
Decimal: 2187971016
Hostname: 130.105.201.200
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Manila
Latitude: 14.6019 (14° 36′ 6.84″ N)
Longitude: 120.9896 (120° 59′ 22.56″ E)
Postal Code: 1006

Geolocation Map

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IP Details for 130.105.201.250

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.201.250 Lookup IP Address

Details for 130.105.201.250

IP: 130.105.201.250
Decimal: 2187971066
Hostname: 130.105.201.250
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Manila
Latitude: 14.6019 (14° 36′ 6.84″ N)
Longitude: 120.9896 (120° 59′ 22.56″ E)
Postal Code: 1006

Geolocation Map

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PROGRESSIVE
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Your quote, your way
Connect with Flo on Messenger
Get a Quote

FIND THE BEST VPN IN SECONDS.
VPN Simplifier™
Show Me

Get more green
Save when you bundle

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IP Details for 130.105.216.30

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.216.30 Lookup IP Address

Details for 130.105.216.30

IP: 130.105.216.30
Decimal: 2187974686
Hostname: 130.105.216.30
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Quezon City
Latitude: 14.6284 (14° 37′ 42.24″ N)
Longitude: 121.0462 (121° 2′ 46.32″ E)
Postal Code: 1109

Geolocation Map

Leaflet | © OpenStreetMap Terms

Battery lasts
Unbelievable battery for unbelievable times
The all-new Galaxy A50
Made for real moments
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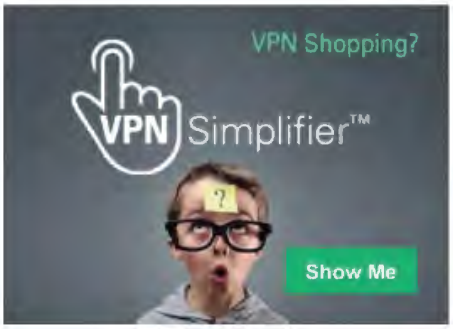

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IP Details for 130.105.216.62

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

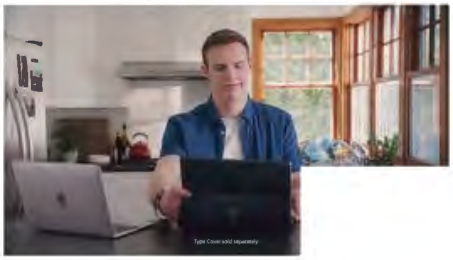
130.105.216.62 Lookup IP Address

Details for 130.105.216.62

IP: 130.105.216.62
Decimal: 2187974718
Hostname: 130.105.216.62
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Makati City
Latitude: 14.5504 (14° 33′ 1.44″ N)
Longitude: 121.0602 (121° 3′ 36.72″ E)
Postal Code: 1211

Geolocation Map

Leaflet | © OpenStreetMap Terms



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IP Details for 130.105.217.13

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.217.13 Lookup IP Address

Details for 130.105.217.13

IP: 130.105.217.13
Decimal: 2187974925
Hostname: 130.105.217.13
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Mandaluyong City
Latitude: 14.5834 (14° 35′ 0.24″ N)
Longitude: 121.0367 (121° 2′ 12.12″ E)
Postal Code: 1550

Geolocation Map

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Five Easy Steps to Window and Door Replacement
We'll guide you through each step of the process to make your replacement project a success.
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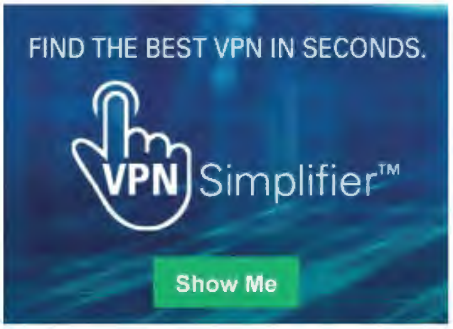

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IP Details for 130.105.217.39

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.217.39 Lookup IP Address

Details for 130.105.217.39

IP: 130.105.217.39
Decimal: 2187974951
Hostname: 130.105.217.39
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Mandaluyong City
Latitude: 14.5834 (14° 35′ 0.24″ N)
Longitude: 121.0367 (121° 2′ 12.12″ E)
Postal Code: 1550

Geolocation Map

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IP Details for 130.105.217.233

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

130.105.217.233 Lookup IP Address

Details for 130.105.217.233

IP: 130.105.217.233
Decimal: 2187975145
Hostname: 130.105.217.233
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Mandaluyong City
Latitude: 14.5834 (14° 35′ 0.24″ N)
Longitude: 121.0367 (121° 2′ 12.12″ E)
Postal Code: 1550

Geolocation Map

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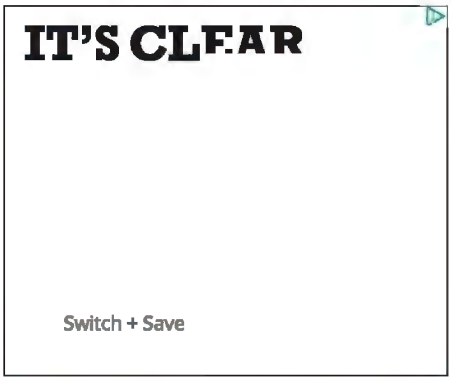

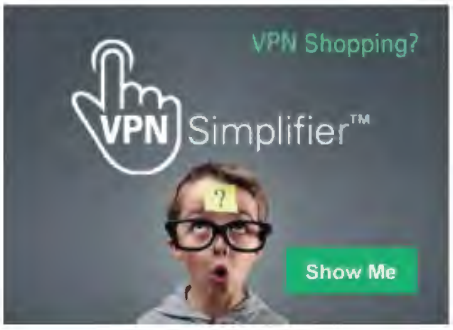

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IP Address|Searc Search

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MY IP IP LOOKUP HIDE MY IP VPNS TOOLS LEARN

IP Details for 144.48.201.18

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

144.48.201.18 Lookup IP Address

Details for 144.48.201.18

IP: 144.48.201.18
Decimal: 2419116306
Hostname: 144.48.201.18
ASN: 58757
ISP: Ace Wireless Network Phils.
Organization: Ace Wireless Network Phils.
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Bohol
City: Dao
Latitude: 9.5723 (9° 34′ 20.28″ N)
Longitude: 123.806 (123° 48′ 21.60″ E)

Geolocation Map

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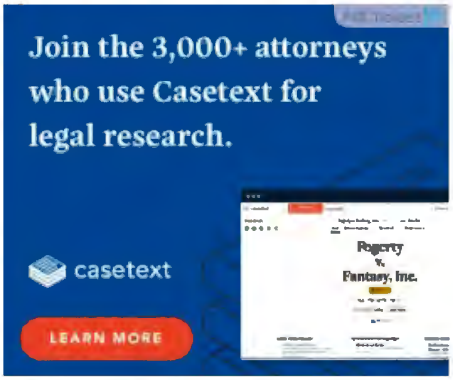

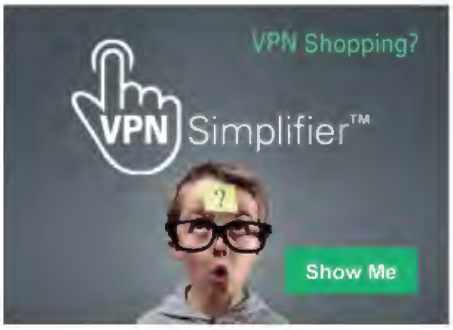

User Comments About 144.48.201.18

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IP Details for 202.128.53.168

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

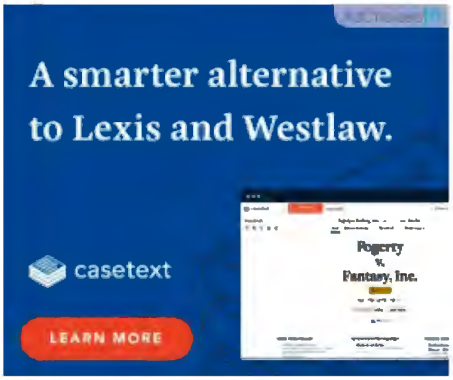
202.128.53.168 Lookup IP Address

Details for 202.128.53.168

IP: 202.128.53.168
Decimal: 3397399976
Hostname: 202.128.53.168
ASN: 23944
ISP: Sky Cable
Organization: Sky Cable
Services: None detected
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Continent: Asia
Country: Philippines
State/Region: Metro Manila
City: Quezon City
Latitude: 14.621 (14° 37′ 15.60″ N)
Longitude: 121.0459 (121° 2′ 45.24″ E)
Postal Code: 1111

Geolocation Map

Leaflet | © OpenStreetMap Terms



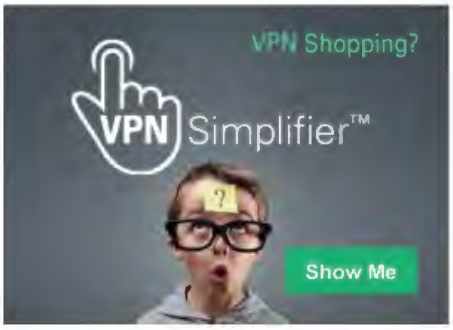


EXHIBIT C

MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 2405:204:838c:f003:8179:b3a5:ae53:e218 –

20 September 2019, 09:38:56

IP Address v6:	IPv6 2405:204:838c:f003:8179:b3a5:ae53:e218
IP Location:	India, Gujarat, Jalalpur
IP Reverse DNS (Host):	2405:204:838c:f003:8179:b3a5:ae53:e218
IP Owner:	**Reliance Jio Infocomm Limited**
Owner IPv6 Range:	2405:200:: - 2405:207:ffff:ffff:ffff:ffff:ffff:ffff
No. of IP in Range:	633,825,300,114,114,700,748,351,602,688 ipv6 addresses
Owner Address:	Reliance Jio Infocomm Ltd Ghansoli India
Owner Country:	India
Owner Phone:	+91-44770000, +919867564147, +912279670000
Owner Website:	www.ril.com
Owner CIDR:	2405:200::/29

Reverse IP Lookup / Information on IP (2405:204:838c:f003:8179:b3a5:ae53:e218) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites
Web Browser/s on this IP:	Unknown
OS on this IP:	Unknown
ASN:	AS55836

Whois Original Data on IP 2405:204:838c:f003:8179:b3a5:ae53:e218 –

[hide/show]

Information from whois://whois.arin.net:43

% Information related to '2405:200::/29'

inet6num:	2405:200::/29
netname:	RELIANCEJIO-IN
descr:	Reliance Jio Infocomm Limited
country:	IN
org:	ORG-RJIL1-AP
admin-c:	RJIL1-AP

tech-c:	RJIL1-AP
mnt-by:	APNIC-HM
mnt-lower:	MAINT-IN-RELIANCEJIO
mnt-routes:	MAINT-IN-RELIANCEJIO
mnt-irt:	IRT-RELIANCEJIO-IN
status:	ALLOCATED PORTABLE
remarks:	To report network abuse, please contact mnt-irt
remarks:	For troubleshooting, please contact tech-c and admin-c
remarks:	Report invalid contact via www.apnic.net/invalidcontact
last-modified:	2017-09-26T23:29:11Z
source:	APNIC
irt:	IRT-RELIANCEJIO-IN
address:	Reliance JIO INFOCOMM LTD GHANSOLI INDIA
e-mail:	ip.abuse@ril.com
abuse-mailbox:	ip.abuse@ril.com
admin-c:	IBSP1-AP
tech-c:	IBSP1-AP
auth:	# Filtered
mnt-by:	MAINT-IN-RELIANCEJIO
last-modified:	2016-03-09T23:57:53Z
source:	APNIC
organisation:	ORG-RJIL1-AP
org-name:	Reliance Jio Infocomm Limited
country:	IN
address:	Reliance Coporate IT park LTD
address:	Ghansoli NaviMumbai
phone:	+912279670000
fax-no:	+912279610099
e-mail:	ip.management@ril.com
mnt-ref:	APNIC-HM
mnt-by:	APNIC-HM
last-modified:	2017-11-15T12:56:20Z
source:	APNIC
role:	Reliance Jio Infocomm Limited
address:	Reliance JIO INFOCOMM LTD GHANSOLI INDIA
country:	IN
phone:	+91-44770000
e-mail:	ip.management@ril.com

admin-c:	RJIL1-AP
tech-c:	RJIL1-AP
nic-hdl:	RJIL1-AP
mnt-by:	MAINT-IN-RELIANCEJIO
last-modified:	2016-03-09T23:55:07Z
source:	APNIC

% Information related to '2405:204:e000::0/36AS55836'

route6:	2405:204:e000::0/36
descr:	Route Set JIO IPV6 Madhyapradesh/CG Circle LTE USER Pool
origin:	AS55836
country:	IN
mnt-lower:	MAINT-IN-RELIANCEJIO
mnt-routes:	MAINT-IN-RELIANCEJIO
mnt-by:	MAINT-IN-RELIANCEJIO
notify:	Ip.abuse@ril.com
last-modified:	2016-03-30T14:05:50Z
source:	APNIC

Friday 20 September 2019, 09:38:56

« 2405::f04a:d200:e86b:6959:b424:b933 2405:204:838c:f003:8179:b3a5:ae53:e218 2405:e40:1:101::1 »

Quick access to this page: https://myip.ms/2405:204:838c:f003:8179:b3a5:ae53:e218

Home GoUrl.io - Bitcoin Gateway API Countries World Hosting Files / Reports Sitemap

Spelling Error? Select it and press Ctrl + Enter gourl.io

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Bitcoin: 1FzxJBxy3fJDv5PLGqbdN9TrQ79LE9UEtB Litecoin: LRpJFfCJqZBBFiSTaTewq5mLWJTF7G29yX
Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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EXHIBIT D

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2017-12-28T20:41:00+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	172.94.70.88	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2017-12-29T03:59:06+00:00	Sharing	Opened a link (non-team member)	2605:e000:87d1:3200:15c8:723:e88:9b6e	US	Fullerton	California	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T03:59:45+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2605:e000:87d1:3200:15c8:723:e88:9b6e	US	Fullerton	California	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2017-12-29T04:18:53+00:00	Sharing	Opened a link (non-team member)	2605:e000:87d1:3200:15c8:723:e88:9b6e	US	Fullerton	California	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T04:19:07+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2605:e000:87d1:3200:15c8:723:e88:9b6e	US	Fullerton	California	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2017-12-29T18:39:30+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T18:40:09+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2017-12-29T18:47:17+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "51022 Malvern", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/51022 Malvern", "is_dir": true}
2017-12-29T18:47:23+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T18:57:45+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T18:58:02+00:00	Sharing	Added a file/folder to their Dropbox from a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2017-12-29T19:14:46+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-29T19:16:36+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Pro-Card", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Pro-Card", "is_dir": true}
2017-12-29T19:16:39+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Pro-Card", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Pro-Card/Pro-Card", "is_dir": true}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2017-12-29T19:17:36+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2600:1700:d560:6950:f466:1787:6873:dc69	US	Fullerton	California	info@fullertoncameras.com	info@fullertoncameras.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_PRR.zip**", "is_dir": false}
2017-12-30T19:42:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	172.94.70.32	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/ACUSA_PRR.zip", "is_dir": false}
2017-12-30T20:58:18+00:00	Sharing	Opened a link (non-team member)	141.101.146.243	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2017-12-30T20:59:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.243	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "ACUSA_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**ACUSA_PRR.zip**", "is_dir": false}
2018-03-29T20:09:16+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:09:38+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR_CE.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRR_CE.zip**", "is_dir": false}
2018-03-29T20:10:09+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Vernoica Duarte PRR", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Vernoica Duarte PRR**", "is_dir": true}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2018-03-29T20:10:16+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:10:23+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Lucity", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Lucity**", "is_dir": true}
2018-03-29T20:10:28+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:10:33+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Dukes", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**Dukes**", "is_dir": true}
2018-03-29T20:10:37+00:00	Sharing	Opened a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-03-29T20:11:55+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.146.225	NO	Oslo	Oslo County	joshua@joshuaferguson.com	joshua@joshuaferguson.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "(Addendum No. 1 Plans).zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**(Addendum No. 1 Plans).zip**", "is_dir": false}
2018-10-26T18:44:04+00:00	Sharing	Opened a link (non-team member)	213.5.69.31	NL	Unknown	Unknown	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2018-10-27T19:22:33+00:00	Sharing	Opened a link (non-team member)	185.2.31.200	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-27T22:56:51+00:00	Sharing	Opened a link (non-team member)	185.2.31.200	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-10-30T23:12:41+00:00	Sharing	Opened a link (non-team member)	185.2.29.211	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T03:14:55+00:00	Sharing	Opened a link (non-team member)	188.72.82.15	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T21:44:14+00:00	Sharing	Opened a link (non-team member)	188.72.82.73	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2018-11-06T21:44:50+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	188.72.82.73	NL	Amsterdam	North Holland	joshua@thehourlystruggle.com	joshua@thehourlystruggle.com	{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PPR_Cox.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PPR_Cox.zip**", "is_dir": false}

EXHIBIT E

MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 141.101.146.225 –

16 September 2019, 02:32:23

IP Address:	141.101.146.225
IP Location:	Netherlands, Oslo County, Oslo
IP Reverse DNS (Host):	141.101.146.225
IP Owner:	**Gz Systems Limited**
Owner IP Range:	141.101.146.0 - 141.101.146.255 (256 ip)
Owner Address:	8Th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
Owner Country:	Norway
Owner Phone:	+85281254857
Owner CIDR:	141.101.146.0/24
Whois Record Created:	19 Aug 2019

Reverse IP Lookup / Information on IP (141.101.146.225) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Google Chrome 65
OS on this IP:	Windows 10 x64 Edition
Browser Agent/s on this IP:	Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/65.0.3325.162 Safari/537.36
ASN:	AS205227 , AS201011 , AS56495 , AS203629 , AS58272 , AS33891 , AS60954 , AS9009

Parent Owner Information on IP 141.101.146.225 –

Parent IP Owner:	**Leadertelecom B.v**
Parent Owner IP Range:	141.101.128.0 - 141.101.255.255 (32,768 ip)
Parent Owner Address:	Leadertelecom B.v, Zekeringstraat 17 A, 1014 Bm, Amsterdam, Netherlands
Parent Owner Country:	Netherlands

Parent Owner Phone:	+310208908077, +31207640722
Parent Owner Website:	www.leadertelecom.ru
Parent Owner CIDR:	141.101.128.0/17
Whois Record Created:	09 Jan 2019

Whois Original Data on IP 141.101.146.225 – [hide/show]

WHOIS - Gz Systems Limited | **WHOIS - Leadertelecom B.v**

Whois Original Data - Gz Systems Limited, IP Address: 141.101.146.225 [141.101.146.0 - 141.101.146.255]

Information from whois://whois.ripe.net:43

% Information related to '141.101.146.0 - 141.101.146.255'

inetnum:	141.101.146.0 - 141.101.146.255
netname:	PureVPN-NET
country:	NO
admin-c:	UG860-RIPE
tech-c:	UG860-RIPE
status:	ASSIGNED PA
mnt-by:	LeadertelecomBV-mnt
created:	2017-06-20T06:45:51Z
last-modified:	2019-08-19T08:30:57Z
source:	RIPE
person:	Uzair Gadit
address:	8th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
phone:	+85281254857
nic-hdl:	UG860-RIPE
mnt-by:	leadertelecombv-mnt
created:	2014-06-06T08:12:50Z
last-modified:	2019-06-24T09:54:46Z
source:	RIPE # Filtered

% Information related to '141.101.146.0/24AS203629'

route:	141.101.146.0/24
descr:	GZ Systems Limited
origin:	AS203629
mnt-by:	LeadertelecomBV-mnt
mnt-by:	no-terrahost-1-mnt
created:	2019-08-19T15:13:07Z

last-modified:	2019-08-19T15:13:07Z
source:	RIPE

Monday 16 September 2019, 02:32:23

Known User Web Browsers on IP - 141.101.146.225

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	141.101.146.225	Netherlands	Windows 10 x64 Edition	Google Chrome 65		27 Mar 2018, 04:53

Total: **1** record

«« 141.101.145.0 – Prev IP Range « 141.101.146.224 141.101.146.225 141.101.146.226 » Next IP Range – 141.101.147.0 »»

Quick access to this page: https://myip.ms/141.101.146.225

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Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 188.72.82.15 –

16 September 2019, 02:12:38

IP Address:	188.72.82.15
IP Location:	Netherlands, North Holland, Amsterdam
IP Reverse DNS (Host):	188.72.82.15
IP Owner:	**Gz Systems Limited**
Owner IP Range:	188.72.82.0 - 188.72.82.255 (256 ip)
Owner Address:	8Th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
Owner Country:	Netherlands
Owner Phone:	+85281254857
Owner CIDR:	188.72.82.0/24
Whois Record Created:	31 Jan 2019

Reverse IP Lookup / Information on IP (188.72.82.15) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Unknown
OS on this IP:	Unknown
ASN:	AS205227 , AS201011 , AS56495 , AS3223 , AS58272 , AS33891 , AS60954 , AS49367 , AS9009 , AS51167 , AS51430

Parent Owner Information on IP 188.72.82.15 –

Parent IP Owner:	**Leadertelecom B.v**
Parent Owner IP Range:	188.72.80.0 - 188.72.127.255 (12,288 ip)
Parent Owner Address:	Leadertelecom B.v, Zekeringstraat 17 A, 1014 Bm, Amsterdam, Netherlands
Parent Owner Country:	Netherlands
Parent Owner Phone:	+310208908077, +31207640722

Parent Owner Website:	www.leadertelecom.ru
Parent Owner CIDR:	188.72.80.0/20, 188.72.96.0/19
Whois Record Created:	09 Jan 2019

Whois Original Data on IP 188.72.82.15 – [hide/show]

WHOIS - Gz Systems Limited | **WHOIS - Leadertelecom B.v**

Whois Original Data - Gz Systems Limited, IP Address: 188.72.82.15 [188.72.82.0 - 188.72.82.255]

Information from whois://whois.ripe.net:43

% Information related to '188.72.82.0 - 188.72.82.255'

inetnum:	188.72.82.0 - 188.72.82.255
netname:	PureVPN-NET
descr:	GZ Systems Limited - Colocation in New York
country:	NL
admin-c:	UG860-RIPE
tech-c:	UG860-RIPE
status:	ASSIGNED PA
mnt-routes:	CORE-BACKBONE
mnt-by:	LeadertelecomBV-mnt
created:	2017-06-20T06:19:30Z
last-modified:	2017-07-17T07:39:39Z
source:	RIPE
person:	Uzair Gadit
address:	8th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
phone:	+85281254857
nic-hdl:	UG860-RIPE
mnt-by:	leadertelecombv-mnt
created:	2014-06-06T08:12:50Z
last-modified:	2017-05-04T07:14:40Z
source:	RIPE # Filtered

% Information related to '188.72.82.0/24AS201011'

route:	188.72.82.0/24
descr:	PureVPN
origin:	AS201011
mnt-by:	CORE-BACKBONE
created:	2019-01-31T08:03:26Z

last-modified:	2019-01-31T08:03:26Z
source:	RIPE

% Information related to '188.72.82.0/24AS33891'

route:	188.72.82.0/24
descr:	PureVPN
origin:	AS33891
mnt-by:	CORE-BACKBONE
created:	2017-06-23T14:23:24Z
last-modified:	2017-06-23T14:23:24Z
source:	RIPE

Monday 16 September 2019, 02:12:38

«« 188.72.81.0 – Prev IP Range « 188.72.82.14 188.72.82.15 188.72.82.16 » Next IP Range – 188.72.83.0 »»

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MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 172.94.70.88 –

18 September 2019, 11:39:03

IP Address:	172.94.70.88
IP Location:	USA, Oslo County, Oslo
IP Reverse DNS (Host):	172.94.70.88
IP Owner:	**Secure Internet Llc**
Owner IP Range:	172.94.0.0 - 172.94.127.255 (32,768 ip)
Owner Address:	10685-B Hazelhurst Dr. #14783, Houston, Tx 77043 Usa, Houston, TX, 77043, US
Owner Country:	USA
Owner Phone:	+1-217-651-4225
Owner Website:	www.systeam.pk, www.purevpn.com
Owner CIDR:	172.94.0.0/17
Whois Record Created:	21 Sep 2015
Whois Record Updated:	12 Jun 2018

Reverse IP Lookup / Information on IP (172.94.70.88) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Firefox 52
OS on this IP:	Windows 7 x64 Edition
Browser Agent/s on this IP:	Mozilla/5.0 (Windows NT 6.1; Win64; x64; rv:52.0) Gecko/20100101 Firefox/52.0
ASN:	AS15003 , AS174 , AS21859 , AS29073 , AS3223 , AS32489 , AS35908 , AS36351 , AS39324 , AS46407 , AS53889 , AS54600 , AS57814

Whois Original Data on IP 172.94.70.88 – [hide/show]

Information from whois://whois.arin.net:43

NetRange:	172.94.9.0 - 172.94.9.255
CIDR:	172.94.9.0/24
NetName:	INTERNET-SECURITY---GB
NetHandle:	NET-172-94-9-0-1
Parent:	INTERNET-SHIELD-16 (NET-172-94-0-0-1)
NetType:	Reassigned
OriginAS:	AS29073
Organization:	Internet Security - GB (ISG-91)
RegDate:	2015-09-21
Updated:	2018-06-12
Ref:	https://rdap.arin.net/registry/ip/172.94.9.0
OrgName:	Internet Security - GB
OrgId:	ISG-91
Address:	89 Bricks Lane
Address:	Shoreditch
City:	London
StateProv:	LONDON
PostalCode:	
Country:	GB
RegDate:	2015-09-21
Updated:	2015-09-21
Ref:	https://rdap.arin.net/registry/entity/ISG-91
OrgAbuseHandle:	NOC32087-ARIN
OrgAbuseName:	Network Operations Center
OrgAbusePhone:	+12176514225
OrgAbuseEmail:	admin@pointtoserver.com
OrgAbuseRef:	https://rdap.arin.net/registry/entity/NOC32087-ARIN
OrgTechHandle:	NOC32087-ARIN
OrgTechName:	Network Operations Center
OrgTechPhone:	+12176514225
OrgTechEmail:	admin@pointtoserver.com
OrgTechRef:	https://rdap.arin.net/registry/entity/NOC32087-ARIN
NetRange:	172.94.0.0 - 172.94.127.255
CIDR:	172.94.0.0/17
NetName:	INTERNET-SHIELD-16
NetHandle:	NET-172-94-0-0-1
Parent:	NET172 (NET-172-0-0-0-0)
NetType:	Direct Allocation

OriginAS:	
Organization:	Secure Internet LLC (SIL-69)
RegDate:	2015-06-02
Updated:	2015-06-02
Ref:	https://rdap.arin.net/registry/ip/172.94.0.0
OrgName:	Secure Internet LLC
OrgId:	SIL-69
Address:	10685-B Hazelhurst Dr. #14783
Address:	Houston, TX 77043 USA
City:	Houston
StateProv:	TX
PostalCode:	77043
Country:	US
RegDate:	2013-01-17
Updated:	2017-01-28
Ref:	https://rdap.arin.net/registry/entity/SIL-69
OrgTechHandle:	GADIT3-ARIN
OrgTechName:	Gadit, Uzair
OrgTechPhone:	+1-217-651-4225
OrgTechEmail:	admin@pointtoserver.com
OrgTechRef:	https://rdap.arin.net/registry/entity/GADIT3-ARIN
OrgAbuseHandle:	GADIT3-ARIN
OrgAbuseName:	Gadit, Uzair
OrgAbusePhone:	+1-217-651-4225
OrgAbuseEmail:	admin@pointtoserver.com
OrgAbuseRef:	https://rdap.arin.net/registry/entity/GADIT3-ARIN
OrgNOCHandle:	GADIT3-ARIN
OrgNOCName:	Gadit, Uzair
OrgNOCPhone:	+1-217-651-4225
OrgNOCEmail:	admin@pointtoserver.com
OrgNOCRef:	https://rdap.arin.net/registry/entity/GADIT3-ARIN

Wednesday 18 September 2019, 11:39:03

Known User Web Browsers on IP - 172.94.70.88

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	172.94.70.88	Sweden	Windows 7 x64 Edition	Firefox 52		23 Apr 2017, 17:01

Total: **1** record

«« 172.93.255.0 – Prev IP Range « 172.94.70.87 172.94.70.88 172.94.70.89 » Next IP Range – 172.94.128.0 »»

Quick access to this page: https://myip.ms/172.94.70.88

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Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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Hosting Info, Websites & IP Database

Whois IP Live Results for 185.2.29.184 –

16 September 2019, 02:17:38

IP Address:	185.2.29.184
IP Location:	Netherlands, North Holland, Amsterdam
IP Reverse DNS (Host):	nld-net-ip.as51430.net
IP Owner:	AltusHost **Altushost B.V**
Owner IP Range:	185.2.29.0 - 185.2.30.255 (512 ip)
Owner Address:	Altushost B.v, Beechavenue 129, 1119 Rb, Schiphol-Rijk, Netherlands
Owner Country:	Netherlands
Owner Phone:	+31 208 084 444
Owner Website:	www.altushost.com
Owner CIDR:	185.2.29.0/24, 185.2.30.0/24
Whois Record Created:	17 May 2017

Reverse IP Lookup / Information on IP (185.2.29.184) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	**5 live websites used this IP (185.2.29.184) Before -** • oktamam.com (#224,928) used IP on 14 July 2015 • green-top.org (#3,842,203) used IP on 12 April 2015 • ramysabry.ws (#4,573,762) used IP on 30 September 2014 • hajjajj.com (#1,024,905) used IP on 03 September 2014 *... ... ... Found: 5 websites ... ... more »*
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Firefox 67 Google Chrome 71
OS on this IP:	Windows 10 Windows 10 x64 Edition Windows 7 x64 Edition
Browser Agent/s on this IP:	Mozilla/5.0 (Windows NT 6.1; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/71.0.3 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/71.0. *... ... ... Found: 4 different web browsers ... ... more »*
ASN:	AS51430 , AS60778

Whois Original Data on IP 185.2.29.184 - [hide/show]

Information from whois://whois.ripe.net:43

% Information related to '185.2.29.0 - 185.2.30.255'

inetnum:	185.2.29.0 - 185.2.30.255
netname:	NL-AH-NET
descr:	AltusHost B.V
descr:	Netherlands
remarks:	INFRA-AW
country:	NL
admin-c:	AHNL-RIPE
tech-c:	AHNL-RIPE
status:	ASSIGNED PA
mnt-by:	MNT-AHBV
mnt-by:	MNT-AHBV
mnt-lower:	MNT-AHBV
mnt-routes:	MNT-AHBV
created:	2012-10-19T15:26:21Z
last-modified:	2019-02-19T11:36:15Z
source:	RIPE
role:	IP Administration
address:	AltusHost B.V
address:	Kingsfordweg 151
address:	1043 GR Amsterdam
address:	The Netherlands
phone:	+31 20 808 44 44
fax-no:	+31 20 808 44 45
abuse-mailbox:	abuse@as51430.net
remarks:	* For spam/abuse/security issues please contact abuse@as51430.net
nic-hdl:	AHNL-RIPE
mnt-by:	MNT-AHBV
created:	2017-05-17T08:54:51Z
last-modified:	2017-05-17T08:55:58Z
source:	RIPE # Filtered

% Information related to '185.2.30.0/24AS51430'

route:	185.2.30.0/24
descr:	ALTUSHOST B.V
origin:	AS51430

mnt-by:	ALTUSHOST-MNT
created:	2012-10-19T15:27:40Z
last-modified:	2013-05-18T21:16:27Z
source:	RIPE

Monday 16 September 2019, 02:17:38

Known User Web Browsers on IP - 185.2.29.184

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	185.2.29.184	Netherlands	Windows 10 x64 Edition	Firefox 67		02 Jun 2019, 17:12
2	185.2.29.184	Netherlands	Windows 10	Google Chrome 71		08 Jan 2019, 18:49
3	185.2.29.184	Netherlands	Windows 10 x64 Edition	Google Chrome 71		23 Dec 2018, 23:53
4	185.2.29.184	Netherlands	Windows 7 x64 Edition	Google Chrome 71		20 Dec 2018, 22:38

Total: **4** records

Websites IP Address Change History for IP - 185.2.29.184

No	Website	Old IP Address was	Host was	Date when site was using this IP	World Site Popular Rating was
1		185.2.29.184	nld-net-ip.as51430.net	31 Jul 2015	**# 5,833,671**
2	istanbulestetik.com.tr	185.2.29.184	nld-net-ip.as51430.net	30 Jul 2015	**# 1,702,642**
3		185.2.29.184	hosted-by.altushost.com	24 Jul 2015	**# 2,569,895**
4		185.2.29.184	nld-net-ip.as51430.net	16 Jul 2015	**# 2,077,457**
5	oktamam.com	185.2.29.184	nld-net-ip.as51430.net	14 Jul 2015	**# 224,928**

Total: **11** records *(show first 5 records only)* View All Records »

«« 185.2.28.0 – Prev IP Range « 185.2.29.183 185.2.29.184 185.2.29.185 » Next IP Range – 185.2.31.0 »»

Quick access to this page: https://myip.ms/185.2.29.184

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Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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Whois IP Live Results for 185.2.31.200 –

16 September 2019, 02:19:06

IP Address:	185.2.31.200
IP Location:	Netherlands, North Holland, Amsterdam
IP Reverse DNS (Host):	nld-net-ip.as51430.net
IP Owner:	**Altushost B.V**
Owner IP Range:	185.2.31.0 - 185.2.31.255 (256 ip)
Owner Address:	Altushost B.v, Beechavenue 129, 1119 Rb, Schiphol-Rijk, Netherlands
Owner Country:	Netherlands
Owner Phone:	+31 208 084 444
Owner Website:	www.altushost.com
Owner CIDR:	185.2.31.0/24
Whois Record Created:	17 May 2017

Reverse IP Lookup / Information on IP (185.2.31.200) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Firefox 27
OS on this IP:	Windows XP
Browser Agent/s on this IP:	Mozilla/5.0 (Windows NT 5.1; rv:27.0) Gecko/20100101 Firefox/27.0
ASN:	AS51430 , AS60778

Whois Original Data on IP 185.2.31.200 – [hide/show]

Information from whois://whois.ripe.net:43

```
% Information related to '185.2.31.0 - 185.2.31.255'

inetnum:        185.2.31.0 - 185.2.31.255
```

netname:	ALTUSHOST-NET
descr:	AltusHost B.V
remarks:	INFRA-AW
country:	NL
admin-c:	AHNL-RIPE
tech-c:	AHNL-RIPE
status:	ASSIGNED PA
mnt-by:	ALTUSHOST-MNT
mnt-by:	ALTUSHOST-MNT
mnt-lower:	ALTUSHOST-MNT
mnt-routes:	ALTUSHOST-MNT
created:	2012-10-19T15:32:34Z
last-modified:	2017-05-17T09:48:37Z
source:	RIPE
role:	IP Administration
address:	AltusHost B.V
address:	Kingsfordweg 151
address:	1043 GR Amsterdam
address:	The Netherlands
phone:	+31 20 808 44 44
fax-no:	+31 20 808 44 45
abuse-mailbox:	abuse@as51430.net
remarks:	* For spam/abuse/security issues please contact abuse@as51430.net
nic-hdl:	AHNL-RIPE
mnt-by:	MNT-AHBV
created:	2017-05-17T08:54:51Z
last-modified:	2017-05-17T08:55:58Z
source:	RIPE # Filtered

% Information related to '185.2.31.0/24AS51430'

route:	185.2.31.0/24
descr:	ALTUSHOST B.V
origin:	AS51430
mnt-by:	ALTUSHOST-MNT
created:	2012-10-19T15:33:08Z
last-modified:	2013-05-18T21:17:17Z
source:	RIPE

Monday 16 September 2019, 02:19:06

Known User Web Browsers on IP - 185.2.31.200

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	185.2.31.200	Netherlands	Windows XP	Firefox 27		08 Oct 2014, 04:06

Total: **1** record

«« 185.2.30.0 – Prev IP Range « 185.2.31.199 185.2.31.200 185.2.31.201 » Next IP Range – 185.2.32.0 »»

Quick access to this page: https://myip.ms/185.2.31.200

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Whois IP Live Results for 213.5.69.8 –

16 September 2019, 02:21:39

IP Address:	213.5.69.8
IP Location:	Netherlands
IP Reverse DNS (Host):	nld-net-ip.as51430.net
IP Owner:	**Altushost B.V**
Owner IP Range:	213.5.64.0 - 213.5.71.255 (2,048 ip)
Owner Address:	Altushost B.v, Beechavenue 129, 1119 Rb, Schiphol-Rijk, Netherlands
Owner Country:	Netherlands
Owner Phone:	+31 208 084 444
Owner Website:	www.altushost.com
Owner CIDR:	213.5.64.0/21
Whois Record Created:	17 May 2017

Reverse IP Lookup / Information on IP (213.5.69.8) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Firefox 27 Firefox 63 Safari 11.1
OS on this IP:	Mac OS X 10.13.4 Windows 10 x64 Edition Windows XP
Browser Agent/s on this IP:	Mozilla/5.0 (Windows NT 5.1; rv:27.0) Gecko/20100101 Firefox/27.0 Mozilla/5.0 (Macintosh; Intel Mac OS X 10_13_4) AppleWebKit/605.1.15 (KHTML, like Gecko) Vers *... ... ... Found: 3 different web browsers ... ... more »*
ASN:	AS51430 , AS60778

Whois Original Data on IP 213.5.69.8 – [hide/show]

Information from whois://whois.ripe.net:43

% Information related to '213.5.64.0 - 213.5.71.255'

inetnum:	213.5.64.0 - 213.5.71.255
netname:	ALTUSHOST
remarks:	Dedicated and VPS
country:	NL
org:	ORG-AI49-RIPE
admin-c:	AHNL-RIPE
tech-c:	AHNL-RIPE
status:	ASSIGNED PI
mnt-by:	RIPE-NCC-END-MNT
mnt-by:	ALTUSHOST-MNT
mnt-routes:	ALTUSHOST-MNT
mnt-domains:	ALTUSHOST-MNT
created:	2009-10-07T13:02:43Z
last-modified:	2017-05-17T09:43:25Z
source:	RIPE
organisation:	ORG-AI49-RIPE
org-name:	AltusHost B.V
org-type:	LIR
address:	Kingsfordweg 151, 9 etage
address:	1043GR
address:	Amsterdam
address:	NETHERLANDS
phone:	+31208084444
fax-no:	+31208084445
admin-c:	DF5486-RIPE
admin-c:	NT1142-RIPE
mnt-ref:	RIPE-NCC-HM-MNT
mnt-ref:	MNT-AHBV
mnt-ref:	MNT-AHBV
mnt-by:	RIPE-NCC-HM-MNT
mnt-by:	MNT-AHBV
abuse-c:	AB27925-RIPE
created:	2010-07-15T13:01:32Z
last-modified:	2018-10-04T14:53:32Z
source:	RIPE # Filtered
role:	IP Administration
address:	AltusHost B.V
address:	Kingsfordweg 151

address:	1043 GR Amsterdam
address:	The Netherlands
phone:	+31 20 808 44 44
fax-no:	+31 20 808 44 45
abuse-mailbox:	abuse@as51430.net
remarks:	* For spam/abuse/security issues please contact abuse@as51430.net
nic-hdl:	AHNL-RIPE
mnt-by:	MNT-AHBV
created:	2017-05-17T08:54:51Z
last-modified:	2017-05-17T08:55:58Z
source:	RIPE # Filtered

% Information related to '213.5.64.0/21AS51430'

route:	213.5.64.0/21
descr:	ALTUSHOST B.V
origin:	AS51430
mnt-by:	ALTUSHOST-MNT
created:	2012-04-06T19:22:41Z
last-modified:	2013-05-18T22:14:15Z
source:	RIPE

Monday 16 September 2019, 02:21:39

Known User Web Browsers on IP - 213.5.69.8

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	213.5.69.8	Netherlands	Windows 10 x64 Edition	Firefox 63		12 Dec 2018, 17:25
2	213.5.69.8	Netherlands	Mac OS X 10.13.4	Safari 11.1		22 Nov 2018, 10:11
3	213.5.69.8	Netherlands	Windows XP	Firefox 27		03 Nov 2014, 02:17

Total: **3** records

«« 213.5.63.0 – Prev IP Range « 213.5.69.7 213.5.69.8 213.5.69.9 » Next IP Range – 213.5.72.0 »»

Quick access to this page: https://myip.ms/213.5.69.8

Home GoUrl.io - Bitcoin Gateway API Countries World Hosting Files / Reports Sitemap

SUPPORT US - if you like this website and wish to support further development of myip.ms -

Bitcoin: 1FzxJBxy3fJDv5PLGqbdN9TrQ79LE9UEtB Litecoin: LRpJFfCJqZBBFiSTaTewq5mLWJTF7G29yX

Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

EXHIBIT G

Rate, review and compare VPN service : VPN Service providers comparison site

PureVPN SERVERS' NETWORK - Which datacenter they're using

Follow @vpn_providers 284 followers

Return to VPN Reviews

Best VPN | Best VPN Software | P2P/Torrent Traffic | Best Cheapest VPN service | Best Anonymous VPN | Best SmartDNS | Residential VPNs | Best Encrypted VPN | Best VPN For Hulu

VPN services

IPVanish is the best value for your money and is highly recommended - **Premium VPN Service providers recommended**

- **IPVanish** 5/5 - IPVanish review
- **Hidemyass** 5/5 - Hidemyass review
- **Private Internet Access** 5/5 - PIA review
- **PureVPN** 5/5 - PureVPN review
- **OverPlay** 4/5
- **Perfect-Privacy** 4/5
- **IAPS** 4/5
- **AirVPN** 4/5 - AirVPN review
- **LiquidVPN** 4/5
- **NordVPN** 4/5 - NordVPN review
- **VPN.AC** 3/5 -

PureVPN Network - PureVPN Infrastructure

Unlike all the other VPNs whose servers we have tested with the OpenVPN protocol, when we tested the ISP used by PureVPN we tried the SSTP protocol.

Why? OpenVPN is not integrated into PureVPN's connection programme, so we chose the best protocol they offer. Note that the SSTP developed by Windows is equivalent to OpenVPN in quality.

PureVPN uses **Data center IP Addresses**. PureVPN is based on good ISPs like AltusHost and Secure Internet LLC

Country	Location	Adress	Hosting provider
Argentina	Buenos Aires	• ar1-sstp.pointtoserver.com	Digital Energy Technologies Chile SpA
Australia	Brisbane	• au1-sstp.pointtoserver.com	Digital Pacific Information Technology
Belgium	Brussels	• be1-sstp.pointtoserver.com	AltusHost B.V

Types of VPN protocols

OpenVPN *vs* SSTP *vs* IKEv2. Protocol IKEv2 along with OpenVPN and SSTP are the most interesting. Each one has its advantages. This section will help to decide upon the ones that better suits with own requirements.

- **OpenVPN** Highly configurable - use a wide range of encryption algorithms
- **SSTP** Can bypass most firewalls
- **IKEv2** The main advantage of IKEv2 is its MOBIKE option

VPN Resources

VPN.AC review
- **IbVPN** 3/5 - IbVPN review
- **AceVPN** 3/5 - AceVPN review
- **Mullvad** 3/5 - Mullvad review
- **Proxy.SH** 3/5
- **ExpressVPN** 3/5 - ExpressVPN review
- **CactusVPN** 2/5 - CactusVPN review
- **SecurityKiss** 2/5 - SecurityKiss review
- **Astrill** 2/5 - Astrill review
- **SlickVPN** 2/5 - SlickVPN review
- **StrongVPN** 2/5
- **HideIpVPN** 2/5
- **VPNTunnel** 1/5
- **BoxPN** 1/5 - BoxPN review
- **TuVPN** 1/5 - TuVPN review
- **VikingVPN** 1/5

Best Encrypted VPN

Best Encrypted VPN

VPN uses encryption to provide data confidentiality. The length of the encryption key is an important security parameter.

Brasil	AOL	• br1-sstp.pointtoserver.com	Digital Energy Technologies Chile SpA
Bulgaria	Sofia	• bg1-sstp.pointtoserver.com • bg2-sstp.pointtoserver.com	B2 Net Solutions
Canada	Quebec Vancouver	• ca3-sstp.pointtoserver.com • ca1-sstp.pointtoserver.com • ca2-sstp.pointtoserver.com	Netelligent Hosting Services
Chile	Santiago	• cl1-sstp.pointtoserver.com	Digital Energy Technologies Chile SpA
China	Dulan	• cn1-sstp.pointtoserver.com	Virtuzo
Costa Rica	Heredia	• cr1-sstp.pointtoserver.com	B2 Net Solutions
Czech Republic	Brno	• cz1-sstp.pointtoserver.com	Master Internet s.r.o
Denmark	Denmark	• dk1-sstp.pointtoserver.com	AltusHost B.V
Egypt	Cairo	• eg1-sstp.pointtoserver.com	B2 Net Solutions
France	Paris	• fr1-sstp.pointtoserver.com	GHOSTnet GmbH

The following sections provide additional information about VPN

- **Data Center VPN's versus Residential VPN's versus Tier-1 VPN's** Different kinds of VPN Servers
- **Explanation of VPN IP Types** Different kinds of IP Addresses
- **Glossary of security terms** Terms Used In VPNs
- **Advantages and benefits of VPN service** VPN Benefits
- **Countries and online services that block VPNs** VPN Blocking
- **The best free VPN services of 2015** Best Free VPN service
- **The Ultimate list of VPN services** List of VPN Providers

How to Check and see if your VPN Connection is Secure

The first thing you should actually check is simply your IP address. Make sure that the location is not your home location, and

- **Private Internet Access** PIA lets you decide on how you want your VPN traffic to be encrypted. AES-128 or AES-256 or Blowfish
- **HideMyAss** HMA! offers the standard BF-CBC (Blowfish) with a 128 bit key
- **VPN.AC** Up to AES 256-bit encryption with Elliptic Curve and/or 4096-bit RSA authentication

Best Logless VPN

Best Logless VPN

No Logs VPN Provider. A VPN can protect your privacy then it is important that it keeps no logs of your activities

- **IPVanish** No Logs. New feature since April 2014
- **Private Internet Access** One of PIA's biggest selling points is that it does not log anything
- **NordVPN** NordVPN doesn't save or keep logs

Anonymity and Privacy

Germany	Munich	• de1-sstp.pointtoserver.com	Dynaceron LLC
Hong Kong	Fanling	• hk1-sstp.pointtoserver.com	Secure Internet LLC
Hungary	Budapest	• hu1-sstp.pointtoserver.com	B2 Net Solutions
Iceland	Reykjavik	• is1-sstp.pointtoserver.com	Secure Internet LLC
Indonesia	Jakarta	• idn1-sstp.pointtoserver.com	Agarto Sdn Bhd
Ireland	Dublin	• ie1-sstp.pointtoserver.com	Blacknight Internet Solutions Ltd
Italy	Milan	• it1-sstp.pointtoserver.com	Seflow S.N.C. Di Marco Brame' & C
Japan	Tokyo	• jp1-sstp.pointtoserver.com	Secure Internet LLC
Latvia	Riga	• lv1-sstp.pointtoserver.com	B2 Net Solutions
Luxembourg	Luxembourg	• lu1-sstp.pointtoserver.com	AltusHost B.V
Malaysia	Kuala Lumpur	•	

that its your VPN providers server.

- **WhatismyIPAdress** Find what is your IP address

Probably one of the most important ones aside from the VPN begin connected. A DNS leak happens when your request to a primary DNS happens outside the VPN. In this case your ISP knows what site you want to visit. Click TEST and see if your connection is safe

Test My DNS

Test to ensure that your machine is not able to submit requests to IPv6 Networks.

Ipv6 test

How to Make Your VPN Even More Secure

Mexico	Mexico	• mx1-sstp.pointtoserver.com	Digital Energy Technologies Chile SpA
Netherlands	Amsterdam	• nl1-sstp.pointtoserver.com	AltusHost B.V
New Zealand	Auckland	• nz1-sstp.pointtoserver.com	Secure Internet LLC
Norway	Oslo	• no1-sstp.pointtoserver.com	AltusHost B.V
Panama	Panama City	•	
Philippines	Buting	• vlap-ph1-sstp.pointtoserver.com	Secure Internet LLC
Poland	Gdansk	• pl1-sstp.pointtoserver.com	CIS NEPHAX
Romania	Bucharest	• ro1-sstp.pointtoserver.com	LeaderTelecom B.V
Russia	Moscow	•	
Singapore	Singapore	• sg1-sstp.pointtoserver.com	Voxel Dot Net
South Africa	Benoni	• sa1-sstp.pointtoserver.com	NetStack-AS
South Korea	Seoul	• kr1-sstp.pointtoserver.com	Secure Internet LLC

The Best Anonymous VPN

A VPN doesn't make you anonymous, but does greatly increase your privacy. Using a VPN is key to being anonymous (from a technical point of view) but don't forget the other aspects like the payment as well as precautions with email addresses and personal data when registering.

- **Private Internet Access** accepts Bitcoin, no logs, shared IP addresses
- **IPVanish** no logs, shared IP addresses
- **LiquidVPN** accepts Bitcoin, no logs, shared IP addresses, offers a Modulating IP Addresses and Warrant Canary

Best VPN For Avoiding Censorship

Best VPN For Avoiding Censorship

Depending on where you live in the world,

- **Ways To Secure Your Privacy If VPN Fails** VPN Kill Switch

VPN Setup

Tutorial to configure your connection

- **VPN on NAS Synology** Synology NAS
- **Force Vuze to only load Torrents through VPN** Set up the VPN on Vuze
- **How to BitTorrent download on Android** uTorrent & IPVanish on Android
- **How To Set Up A VPN In A VPS** Setup OpenVPN on VPS

you might be currently experiencing Internet censorship restrictions for political reasons or otherwise. A VPN is essential for bypass censorship restrictions and have unfiltered access to the Internet

- **IPVanish** Get around internet censorship blocks, completely bypassing firewalls in countries like China, by simply connecting to the IPVanish's servers
- **Private Internet Access** To bypass censorship PIA is a top quality solution because it uses a high encryption level and can avoid firewalls using its option "Local Port"
- **PureVPN** If there is a firewall that operates with deep-packet inspection, the firewall will not be able to monitor the transport packets from the SSTP VPN tunnel thanks to the fact that SSTP uses the HTTPS protocol

Best VPN for Bypassing Chinese Firewall

Sweden	Stockholm	•	
Switzerland	Bern	•	
Taiwan	Taipei	• tw1-sstp.pointtoserver.com	Secure Internet LLC
Thailand	Bangkok	• kr1-sstp.pointtoserver.com	Secure Internet LLC
Turkey	Istanbul	• tr1-sstp.pointtoserver.com	Radore Veri Merkezi Hizmetleri A.S
UK	London Maidenhead	• uk1-sstp.pointtoserver.com • uk2-sstp.pointtoserver.com • uk7-sstp.pointtoserver.com	• GS Systems Ltd • UK2 - Ltd • Iomart Hosting Limited
Ukraine	Kiev	• ua1-sstp.pointtoserver.com	B2 Net Solutions
USA	Atlanta Chicago Los Angeles New Jersey New York Miami	• us1-sstp.pointtoserver.com • us2-sstp.pointtoserver.com • us10-sstp.pointtoserver.com • us14-sstp.pointtoserver.com	• QuadraNet • Webair Internet Development Company • Nobis Technology Group, LLC • SingleHop

	Phoenix Washington		
Vietnam	Hanoi	• vlap-vn1-sstp.pointtoserver.com	Secure Internet LLC

The Best VPN For China

China is one of the World's heavily censored countries. The Great Firewall of China blocks Google+, Facebook, Youtube and Twitter. People in China have to use a VPN but only those that offer SSTP or OpenVPN (TCP will work well)

- **PureVPN** is one of the rare VPNs to offer a special installation format for China.
- **VPN.AC** VPN.AC can circumvent county blocks like the great wall of China. VPN.AC has Xor obfuscation for openvpn and can use TCP port 443 to mask that it looks like regular SSL traffic
- **AceVPN**'s Stealth VPN works in countries like China

Best VPN by numbers of countries

Best VPN server locations

VPN with Most IP VPN Addresses. This

EXHIBIT H

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2019-06-06T22:18:32+00:00	Files	Added files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAfFw", "host_id": 54021431056}
2019-06-06T22:31:49+00:00	Files	Deleted files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAfFw", "host_id": 54021431056}
2019-06-06T22:33:22+00:00	Files	Added files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAfGA", "host_id": 54021431056}
2019-06-06T22:33:40+00:00	Files	Deleted files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAfGA", "host_id": 54021431056}
2019-06-06T22:35:10+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:35:26+00:00	Files	Added files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAfGQ", "host_id": 54021431056}
2019-06-06T22:35:30+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:38:20+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:48:30+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2019-06-06T22:50:30+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:52:19+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:53:16+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Pro Card 5-29-19.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false}
2019-06-06T22:54:42+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T22:54:50+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Pro Card 5-29-19.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false}
2019-06-06T22:57:21+00:00	Sharing	Opened a link (non-team member)	74.62.244.66	US	Fullerton	California			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpleQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2019-06-06T23:15:42+00:00	Sharing	Opened a link (non-team member)	178.175.132.214	Unknown	Unknown	Unknown			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-06-06T23:16:46+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	178.175.132.214	Unknown	Unknown	Unknown			{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "PRR Pro Card 5-29-19.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/PRR Pro Card 5-29-19.zip", "is_dir": false}

WhatIsMyIPAddress.com

AS SEEN ON: PCWorld, Business Insider, the guardian, CNN, USA TODAY, DIGITAL TRENDS, cnet, HUFFPOST, The Washington Post, KrebsonSecurity, FOX Business, CBS NEWS

IP Address|Searc Search

About | Press | Contact

MY IP IP LOOKUP HIDE MY IP VPNS TOOLS LEARN

IP Details for 178.175.132.214

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

178.175.132.214 Lookup IP Address

Details for 178.175.132.214

IP: 178.175.132.214
Decimal: 2997847254
Hostname: 178-175-132-214.static.as43289.net
ASN: 43289
ISP: trabia network
Organization: trabia network
Services: Confirmed proxy server, Tor exit node, Recently reported forum spam source. (453)
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Country:

Geolocation Map

User Comments About 178.175.132.214

No comments. Be the first to add one.

Enter up to 500 characters in your comment about this IP address.

If you have a question contact support or post in the community.

EXHIBIT I

Access by Chris Tennyson ("christennyson@gmail.com")

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2019-01-16T23:34:19+00:00	Sharing	Opened a link (non-team member)	2600:1700:d560:6950:ac52:35e9:ad62:9ec3	US	Fullerton	California	christennyson@gmail.com/ AT&T	christennyson@gmail.com	{"file_obj_id": "4cefSjLh5SUAAAAAAAAACQ", "base_name": "Outbox", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox", "is_dir": true}
2019-01-16T23:34:23+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	2600:1700:d560:6950:ac52:35e9:ad62:9ec3	US	Fullerton	California	christennyson@gmail.com/ AT&T	christennyson@gmail.com	{"file_obj_id": "4cefSjLh5SUAAAAAAAAACQ", "base_name": "PRRS01152019_JF.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/**PRRS01152019_JF.zip**", "is_dir": false}

EXHIBIT J

Tiger_Signal_PRR.zip

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2018-09-26T15:44:12+00:00	Files	Added files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/outbox/Tiger_Signal_PRR.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAUgg", "host_id": 42914893232}
2018-09-26T16:49:24+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	178.20.55.16	Unknown	Unknown	Unknown	TOR, France		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T16:50:21+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	178.20.55.16	Unknown	Unknown	Unknown	TOR, France		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T16:50:51+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	178.20.55.16	Unknown	Unknown	Unknown	TOR, France		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T16:51:47+00:00	Sharing	Opened a link (non-team member)	178.20.55.16	Unknown	Unknown	Unknown	TOR, France		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T16:56:30+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	35.0.127.52	Unknown	Unknown	Unknown	TOR, Michigan		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T16:56:42+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	35.0.127.52	Unknown	Unknown	Unknown	TOR, Michigan		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-26T22:40:50+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	141.101.153.123	US	Los Angeles	California	PureVPN		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}

Tiger_Signal_PRR.zip

Time	Event category	Event type	IP address	Country	City	Region	Name	Email	Info
2018-09-27T00:05:52+00:00	Sharing	Opened a link (non-team member)	196.17.100.89	US	Chicago	Illinois	Seychelles, Victoria		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-27T00:05:53+00:00	Sharing	Opened a link (non-team member)	196.17.100.36	US	Chicago	Illinois	Seychelles, Victoria		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-27T00:05:54+00:00	Sharing	Opened a link (non-team member)	76.79.196.58	US	La Mirada	California	Jones & Mayer		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2018-09-27T00:06:28+00:00	Sharing	Downloaded a file/folder from a link (non-team member)	76.79.196.58	US	La Mirada	California	Jones & Mayer		{"file_obj_id": "4cefSjLn5SUAAAAAAAAACQ", "base_name": "Tiger_Signal_PRR.zip", "link_owner_name": "Fullerton City Dropbox", "link_owner_member_id": "dbmid:AAA8npDJjpIeQmcl3cRcT7ct9YvfCnP0oec", "link_owner_email": "pctech@cityoffullerton.com", "link_owner_id": 152515371, "path": "/File requests/Outbox/Tiger_Signal_PRR.zip", "is_dir": false}
2019-01-04T00:52:28+00:00	Files	Deleted files	74.62.244.66	US	Fullerton	California	Fullerton City Dropbox	pctech@cityoffullerton.com	{"path": "/file requests/outbox/Tiger_Signal_PRR.zip", "is_dir": false, "file_id": "4cefSjLn5SUAAAAAAAAUgg", "host_id": 47201254512}

MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 178.20.55.16 –

18 September 2019, 15:39:00

IP Address:	178.20.55.16
IP Location:	France, Auvergne-Rhone-Alpes, Aime
IP Reverse DNS (Host):	marcuse-1.nos-oignons.net
IP Owner:	**Nos - Oignons**
Owner IP Range:	178.20.55.16 - 178.20.55.19 (4 ip)
Owner Address:	105 Route Des Pommiers, 74370 Saint Martin Bellevue, France
Owner Country:	France
Owner Phone:	+33972429604
Owner Website:	www.nos-oignons.net
Owner CIDR:	178.20.55.16/30
Whois Record Created:	03 Nov 2013

Reverse IP Lookup / Information on IP (178.20.55.16) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Amigo Android Webkit 4 Chrome 19 Chromium 14 Chromium 53 Chromium 55 Chromium 63 Chromium 65 Chromium 8 Firefox 10 ... ... [see all]
OS on this IP:	Android Android 2.3.7 Android 4.0.4 Android 4.1.2 Android 4.2.2 Android 4.4.2 Android 5.0 ... ... [see all]
Browser Agent/s on this IP:	Mozilla/5.0 (Linux; U; Android 2.3.7; en-us; Huawei u8650 Build/GRK39F; CyanogenMod-7.2.0) Ap Mozilla/5.0 (X11; Ubuntu; Linux i686; rv:18.0) Gecko/20100101 Firefox/18.0 *... ... ... Found: 201 different web browsers ... ... more »*
ASN:	AS29075 , AS197422 , AS50618

Parent Owner Information on IP 178.20.55.16 –

Parent IP Owner:	**Ielo - Liazo Deploiement Fibre**
Parent Owner IP Range:	178.20.48.0 - 178.20.55.255 (2,048 ip)
Parent Owner Address:	Comptabilité Fournisseurs, 50 Ter Rue De Malte, 75020, Paris, France
Parent Owner Country:	France
Parent Owner Phone:	+33182288280
Parent Owner CIDR:	178.20.48.0/21
Whois Record Created:	16 Jan 2011

Whois Original Data on IP 178.20.55.16 – [hide/show]

WHOIS - Nos - **Oign**ons | **WHOIS - Ielo - Liazo Deploiement Fibre**

Whois Original Data - **Nos - Oignons**, IP Address: 178.20.55.16 [178.20.55.16 - 178.20.55.19]

Information from whois://whois.ripe.net:43

% Information related to '178.20.55.16 - 178.20.55.19'

inetnum:	178.20.55.16 - 178.20.55.19
netname:	FR-LIAZO-20100216
descr:	NOS-OIGNONS IPTRANSIT CUSTOMER
country:	fr
admin-c:	NOAC1-RIPE
tech-c:	NOTC1-RIPE
org:	ORG-NO16-RIPE
status:	ASSIGNED PA
mnt-by:	MNT-LIAZO
created:	2010-05-28T18:34:37Z
last-modified:	2013-11-03T18:18:07Z
source:	RIPE
organisation:	ORG-NO16-RIPE
org-name:	NOS-OIGNONS
org-type:	OTHER
address:	105 route des Pommiers
address:	74370 Saint Martin Bellevue
address:	France
phone:	+33972429604
fax-no:	+33972429606
mnt-ref:	MNT-LIAZO
mnt-by:	MNT-LIAZO

abuse-c:	NOAC1-RIPE
created:	2013-11-03T18:08:35Z
last-modified:	2013-11-03T18:08:35Z
source:	RIPE # Filtered
role:	NOS OIGNONS administrative contact
abuse-mailbox:	abuse@nos-oignons.net
address:	Centre UBIDOCA, 7585
address:	105 route des Pommiers
address:	74370 Saint Martin Bellevue
address:	France
fax-no:	+33972429606
phone:	+33972429604
admin-c:	NC3619-RIPE
admin-c:	CR6366-RIPE
nic-hdl:	NOAC1-RIPE
mnt-by:	MNT-LIAZO
created:	2013-10-13T12:16:58Z
last-modified:	2013-11-03T19:27:06Z
source:	RIPE # Filtered
role:	NOS OIGNONS technical contact
abuse-mailbox:	abuse@nos-oignons.net
address:	Centre UBIDOCA, 7585
address:	105 route des Pommiers
address:	74370 Saint Martin Bellevue
address:	France
fax-no:	+33972429606
phone:	+33972429604
admin-c:	NC3619-RIPE
admin-c:	CR6366-RIPE
nic-hdl:	NOTC1-RIPE
mnt-by:	MNT-LIAZO
created:	2013-11-03T18:16:34Z
last-modified:	2013-11-03T19:27:28Z
source:	RIPE # Filtered

% Information related to '178.20.48.0/21AS50618'

route:	178.20.48.0/21
descr:	Liazo main network
origin:	AS50618

mnt-by:	MNT-LIAZO
created:	2011-01-16T22:27:36Z
last-modified:	2011-01-16T22:27:36Z
source:	RIPE

Wednesday 18 September 2019, 15:39:00

Known User Web Browsers on IP - 178.20.55.16

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	178.20.55.16	France	Ubuntu x64	Firefox 68		21 Jul 2019, 09:37
2	178.20.55.16	France	Windows 7	Firefox 60		12 Apr 2019, 10:40
3	178.20.55.16	France	Windows 10 x64 Edition	Firefox 66		04 Apr 2019, 06:13
4	178.20.55.16	France	GNU/Linux x64	Google Chrome 71		28 Mar 2019, 07:27
5	178.20.55.16	France	Windows 7	Amigo		24 Mar 2019, 05:17
6	178.20.55.16	France	Windows 8	Google Chrome 33		13 Mar 2019, 05:11
7	178.20.55.16	France	Mac OS X 10.14.1	Google Chrome 71		27 Dec 2018, 10:10
8	178.20.55.16	France	Windows 7 x64 Edition	Google Chrome 68		24 Dec 2018, 00:06
9	178.20.55.16	France	Mac OS X 10.14	Firefox 65		20 Dec 2018, 12:04
10	178.20.55.16	France	Windows 10 x64 Edition	Opera 56		19 Dec 2018, 17:17

Total: **367** records *(show first 10 records only)* View All Records »

«« 178.20.55.0 – Prev IP Range « 178.20.55.15 178.20.55.16 178.20.55.17 » Next IP Range – 178.20.55.20 »»

Quick access to this page: https://myip.ms/178.20.55.16

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Bitcoin: 1FzxJBxy3fJDv5PLGqbdN9TrQ79LE9UEtB Litecoin: LRpJFfCJqZBBFiSTaTewq5mLWJTF7G29yX
Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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IP Details for 178.20.55.16

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

178.20.55.16 Lookup IP Address

Details for 178.20.55.16

IP: 178.20.55.16
Decimal: 2987669264
Hostname: marcuse-1.nos-oignons.net
ASN: 50618
ISP: Ielo-liazo Services SAS
Organization: Ielo-liazo Services SAS
Services: Confirmed proxy server, Tor exit node, Recently reported forum spam source. (697)
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Country:

Geolocation Map

Ad

Get Spectrum Today

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Ad

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Spectrum OPEN

User Comments About 178.20.55.16

Tor exit node, Recently reported forum spam source. - 2014-11-26

Brute force attack. - 2016-03-13

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Rescue by LogMeIn OPEN

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Hosting Info, Websites & IP Database

Whois IP Live Results for 35.0.127.52 –

18 September 2019, 15:41:35

IP Address:	35.0.127.52
IP Location:	USA, Michigan, Ann Arbor
IP Reverse DNS (Host):	tor-exit.eecs.umich.edu
IP Owner:	Merit Network Inc
Owner IP Range:	35.0.0.0 - 35.127.255.255 (8,388,608 ip)
Owner Address:	1000 Oakbrook Drive, Suite 200, Ann Arbor, MI, 48104, US
Owner Country:	USA
Owner Phone:	+1-734-527-5717
Owner Website:	www.merit.edu
Owner CIDR:	35.0.0.0/9
Whois Record Created:	08 Dec 2009
Whois Record Updated:	28 Jan 2017

Reverse IP Lookup / Information on IP (35.0.127.52) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Amigo Android Webkit 4 Chromium 25 Chromium 40 Chromium 41 Chromium 53 Chromium 65 Chromium 69 CoolNovo 2 Firefox 10 ... ... [see all]
OS on this IP:	Android Android 4.1.2 Android 4.2.2 Android 4.3 Android 4.4.2 Android 5.0 Android 5.0.1 ... ... [see all] Windows
Browser Agent/s on this IP:	Mozilla/5.0 (Windows; U; Windows NT 5.2; en-US; rv:2.0b7pre) Gecko/20100929 Firefox/4.0b7pre ... ... *Found: 253 different web browsers ... ... more »*

Whois Original Data on IP 35.0.127.52 – [hide/show]

Information from whois://whois.arin.net:43

NetRange:	35.0.0.0 - 35.127.255.255
CIDR:	35.0.0.0/9
NetName:	MICH-1
NetHandle:	NET-35-0-0-0-1
Parent:	NET35 (NET-35-0-0-0-0)
NetType:	Direct Allocation
OriginAS:	
Organization:	Merit Network Inc. (MICH-Z)
RegDate:	1994-04-01
Updated:	2015-09-18
Ref:	https://rdap.arin.net/registry/ip/35.0.0.0
OrgName:	Merit Network Inc
OrgId:	MICH-Z
Address:	1000 Oakbrook Drive, Suite 200
City:	Ann Arbor
StateProv:	MI
PostalCode:	48104
Country:	US
RegDate:	2009-12-08
Updated:	2017-01-28
Ref:	https://rdap.arin.net/registry/entity/MICH-Z
OrgAbuseHandle:	NETWO26-ARIN
OrgAbuseName:	Network Abuse
OrgAbusePhone:	+1-734-527-5740
OrgAbuseEmail:	abuse@merit.edu
OrgAbuseRef:	https://rdap.arin.net/registry/entity/NETWO26-ARIN
OrgTechHandle:	MERIT-ARIN
OrgTechName:	Merit Operations
OrgTechPhone:	+1-734-527-5717
OrgTechEmail:	operations@merit.edu
OrgTechRef:	https://rdap.arin.net/registry/entity/MERIT-ARIN

Wednesday 18 September 2019, 15:41:35

Known User Web Browsers on IP - 35.0.127.52

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawle Bot	Latest Site Visit Date
1	35.0.127.52	USA	Windows 8.1 x64 Edition	Pale Moon 24.7		15 Sep 2019, 05:12
2	35.0.127.52	USA	Windows 7	Firefox 60		08 Sep 2019, 07:12
3	35.0.127.52	USA	Mac OS X 10.8.7	Google Chrome 33		02 Sep 2019, 05:11
4	35.0.127.52	USA	Mac OS X 10.14	Firefox 68		29 Aug 2019, 02:55
5	35.0.127.52	USA	Ubuntu x64	Firefox 64		28 Aug 2019, 21:39
6	35.0.127.52	USA	Windows Vista	Internet Explorer 9		27 Aug 2019, 05:55
7	35.0.127.52	USA	Windows 7	Yandex Browser 14.4		20 Aug 2019, 05:52
8	35.0.127.52	USA	Windows 7 x64 Edition	Google Chrome 29		17 Aug 2019, 05:47
9	35.0.127.52	USA	Windows 7 x64 Edition	Google Chrome 20		14 Aug 2019, 05:24
10	35.0.127.52	USA	Windows Vista x64 Edition	Google Chrome 30		13 Aug 2019, 05:43

Total: **586** records *(show first 10 records only)* View All Records »

«« 34.255.255.0 – Prev IP Range « 35.0.127.51 35.0.127.52 35.0.127.53 » Next IP Range – 35.128.0.0 »»

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Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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IP Details for 35.0.127.52

This information should not be used for emergency purposes, trying to find someone's exact physical address, or other purposes that would require 100% accuracy.

35.0.127.52 Lookup IP Address

Details for 35.0.127.52

IP: 35.0.127.52
Decimal: 587235124
Hostname: tor-exit.eecs.umich.edu
ASN: 237
ISP: University of Michigan
Organization: University of Michigan
Services: Confirmed proxy server, Tor exit node, Recently reported forum spam source. (5595)
Type: Broadband
Assignment: Likely Static IP
Blacklist: Click to Check Blacklist Status
Country:

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Geolocation Map

User Comments About 35.0.127.52

Sending 1000's of requests to ucp.php?mode=login&redirect=.index.phpsida22c7ca4de722c82d94f0c659d19d21a&sid=a22c7ca4de722c82d94f0c659d19d21a on our forums. *- 2015-08-19*

MYIP.MS
Hosting Info, Websites & IP Database

Whois IP Live Results for 141.101.153.123 –

18 September 2019, 15:43:41

IP Address:	141.101.153.123
IP Location:	Netherlands, California, Los Angeles
IP Reverse DNS (Host):	141.101.153.123
IP Owner:	**Purevpn**
Owner IP Range:	141.101.153.0 - 141.101.153.255 (256 ip)
Owner Address:	8Th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
Owner Country:	USA
Owner Phone:	+85281254857
Owner CIDR:	141.101.153.0/24
Whois Record Created:	13 Sep 2019

Reverse IP Lookup / Information on IP (141.101.153.123) –

IP Blacklist Check: Submit IPv4/v6 to Blacklist	Not Listed in Blacklist
Websites on this IP Now:	No websites All websites in this IP Range »
Websites on this IP Before:	No websites
Not Working Websites on IP:	No websites
Nameservers on this IP:	No nameservers
Web Browser/s on this IP:	Unknown
OS on this IP:	Unknown
ASN:	AS205227 , AS58272 , AS56495 , AS60954 , AS9009

Parent Owner Information on IP 141.101.153.123 –

Parent IP Owner:	**Leadertelecom B.v**
Parent Owner IP Range:	141.101.128.0 - 141.101.255.255 (32,768 ip)
Parent Owner Address:	Leadertelecom B.v, Zekeringstraat 17 A, 1014 Bm, Amsterdam, Netherlands
Parent Owner Country:	Netherlands
Parent Owner Phone:	+310208908077, +31207640722

Parent Owner Website:	www.leadertelecom.ru
Parent Owner CIDR:	141.101.128.0/17
Whois Record Created:	09 Jan 2019

Whois Original Data on IP 141.101.153.123 – [hide/show]

WHOIS - Purevpn **WHOIS - Leadertelecom B.v**

Whois Original Data - **Purevpn**, IP Address: 141.101.153.123 [141.101.153.0 - 141.101.153.255]

Information from whois://whois.ripe.net:43

% Information related to '141.101.153.0 - 141.101.153.255'

inetnum:	141.101.153.0 - 141.101.153.255
netname:	PureVPN-NET
country:	US
admin-c:	UG860-RIPE
tech-c:	UG860-RIPE
status:	ASSIGNED PA
mnt-by:	LeadertelecomBV-mnt
created:	2019-09-13T10:17:19Z
last-modified:	2019-09-13T10:17:19Z
source:	RIPE
person:	Uzair Gadit
address:	8th Floor Gloucester Tower, The Landmark, Queens Road Central Hong Kong
phone:	+85281254857
nic-hdl:	UG860-RIPE
mnt-by:	leadertelecombv-mnt
created:	2014-06-06T08:12:50Z
last-modified:	2019-06-24T09:54:46Z
source:	RIPE # Filtered

% Information related to '141.101.153.0/24AS58272'

route:	141.101.153.0/24
origin:	AS58272
mnt-by:	LeadertelecomBV-mnt
created:	2019-09-09T10:59:26Z
last-modified:	2019-09-09T10:59:26Z
source:	RIPE

Wednesday 18 September 2019, 15:43:41

«« 141.101.152.0 – Prev IP Range « 141.101.153.122 141.101.153.123 141.101.153.124 » Next IP Range – 141.101.154.0 »»

Quick access to this page: https://myip.ms/141.101.153.123

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Dash: XsJvyrSfQW5UFcCnpGKi1aNFprLhmJWgkJ Dogecoin: DNoxuJq61bYLMFFRCSUZHDZeV71b6Ybref

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Hosting Info, Websites & IP Database

«« 196.15.255.0 « 196.17.99.255 - Prev IP Range Next IP Range - 196.17.101.0 » 196.20.0.0 »»

18 September 2019, 13:34:01

Current IP Range:	**196.17.100.0 - 196.17.100.255**
IP Range Location:	Seychelles, English River, Victoria
IP Owner:	**Network And Information Technology Limited**
Owner Full IP Range:	196.16.0.0 - 196.19.255.255
Owner Address:	Unit 117, Orion Mall, Palm Street, Victoria, Mahe, Seychelles, Victoria
Owner Country:	Seychelles
Owner Phone:	+27 12 44 46000, tel:+27-12-444-6000
All Owner IP Ranges:	196.16.0.0 - 196.19.255.255
All Owner CIDR:	196.16.0.0/14
All Owner IP Reverse DNS (Host)s:	196.18.61.200

⇓ Hide Whois Additional Information from whois://whois.afrinic.net ⇓

196.17.100.0 - 196.17.100.255 - IP Range Owner

Information from whois://whois.afrinic.net:43

% Information related to '196.16.0.0 - 196.19.255.255'

inetnum:	196.16.0.0 - 196.19.255.255
netname:	NITL-BLK
descr:	Unit 117, Orion Mall, Palm Street
descr:	Victoria, Mahe
descr:	Seychelles
country:	SC
org:	ORG-IA41-AFRINIC
admin-c:	NAIT1-AFRINIC
tech-c:	NAIT1-AFRINIC
status:	ASSIGNED PI
mnt-by:	AFRINIC-HM-MNT
mnt-lower:	TF-196-16-0-0-196-19-255-255-MNT
mnt-domains:	TF-196-16-0-0-196-19-255-255-MNT
source:	AFRINIC # Filtered
parent:	196.0.0.0 - 196.255.255.255
organisation:	ORG-IA41-AFRINIC
org-name:	Network and Information Technology Limited
org-type:	MEMBER-ONLY
country:	SC
address:	Unit 117, Orion Mall, Palm Street
address:	Victoria, Mahe
address:	Seychelles
address:	Victoria

phone:	tel:+27-12-444-6000
fax-no:	tel:+27-12-444-6001
admin-c:	NAIT1-AFRINIC
tech-c:	NAIT1-AFRINIC
mnt-ref:	AFRINIC-HM-MNT
mnt-ref:	TF-196-16-0-0-196-19-255-255-MNT
mnt-by:	AFRINIC-HM-MNT
source:	AFRINIC # Filtered
person:	Network and Information Technology Administrator
address:	Unit 117, Orion Mall, Palm Street
address:	Victoria, Mahe
address:	Seychelles (SC)
phone:	tel:+1-646-665-1367
nic-hdl:	NAIT1-AFRINIC
remarks:	Announcements allowed by: AS46261 and AS263812
mnt-by:	MNT-NETWORKANDINFORMATIONTECHNOLOGY
source:	AFRINIC # Filtered

Wednesday 18 September 2019, 13:34:01

Hide Information

Known user IP addresses between IP: 196.17.100.0 - 196.17.100.255

No	IP Address	Country	OS on this IP	Web Browser on this IP	Crawler Bot	Latest Site Visit Date
1	196.17.100.4	Seychelles	Unknown	Unknown		07 Jan 2019, 22:25
2	196.17.100.115	Seychelles	Unknown	Unknown		02 Jan 2019, 16:31
3	196.17.100.27	Seychelles	Unknown	Unknown		02 Jan 2019, 16:31
4	196.17.100.179	Seychelles	Unknown	Unknown		02 Jan 2019, 14:51
5	196.17.100.147	Seychelles	Unknown	Unknown		28 Dec 2018, 12:41
6	196.17.100.119	Seychelles	Unknown	Unknown		19 Dec 2018, 18:34
7	196.17.100.51	Seychelles	Unknown	Unknown		19 Dec 2018, 18:34
8	196.17.100.76	Seychelles	Unknown	Unknown		18 Dec 2018, 15:38
9	196.17.100.78	Seychelles	Unknown	Unknown		12 Dec 2018, 16:34
10	196.17.100.106	Seychelles	Unknown	Unknown		12 Dec 2018, 16:32

Total: **14** records *(show first 10 records only)* All Records »

List of All IP addresses in range - 196.17.100.0 - 196.17.100.255

196.17.100.0	196.17.100.1	196.17.100.2	196.17.100.3	196.17.100.4	196.17.100.5
196.17.100.6	196.17.100.7	196.17.100.8	196.17.100.9	196.17.100.10	196.17.100.11
196.17.100.12	196.17.100.13	196.17.100.14	196.17.100.15	196.17.100.16	196.17.100.17
196.17.100.18	196.17.100.19	196.17.100.20	196.17.100.21	196.17.100.22	196.17.100.23
196.17.100.24	196.17.100.25	196.17.100.26	196.17.100.27	196.17.100.28	196.17.100.29

196.17.100.30	196.17.100.31	196.17.100.32	196.17.100.33	196.17.100.34	196.17.100.35
196.17.100.36	196.17.100.37	196.17.100.38	196.17.100.39	196.17.100.40	196.17.100.41
196.17.100.42	196.17.100.43	196.17.100.44	196.17.100.45	196.17.100.46	196.17.100.47
196.17.100.48	196.17.100.49	196.17.100.50	196.17.100.51	196.17.100.52	196.17.100.53
196.17.100.54	196.17.100.55	196.17.100.56	196.17.100.57	196.17.100.58	196.17.100.59
196.17.100.60	196.17.100.61	196.17.100.62	196.17.100.63	196.17.100.64	196.17.100.65
196.17.100.66	196.17.100.67	196.17.100.68	196.17.100.69	196.17.100.70	196.17.100.71
196.17.100.72	196.17.100.73	196.17.100.74	196.17.100.75	196.17.100.76	196.17.100.77
196.17.100.78	196.17.100.79	196.17.100.80	196.17.100.81	196.17.100.82	196.17.100.83
196.17.100.84	196.17.100.85	196.17.100.86	196.17.100.87	196.17.100.88	196.17.100.89
196.17.100.90	196.17.100.91	196.17.100.92	196.17.100.93	196.17.100.94	196.17.100.95
196.17.100.96	196.17.100.97	196.17.100.98	196.17.100.99	196.17.100.100	196.17.100.101
196.17.100.102	196.17.100.103	196.17.100.104	196.17.100.105	196.17.100.106	196.17.100.107
196.17.100.108	196.17.100.109	196.17.100.110	196.17.100.111	196.17.100.112	196.17.100.113
196.17.100.114	196.17.100.115	196.17.100.116	196.17.100.117	196.17.100.118	196.17.100.119
196.17.100.120	196.17.100.121	196.17.100.122	196.17.100.123	196.17.100.124	196.17.100.125
196.17.100.126	196.17.100.127	196.17.100.128	196.17.100.129	196.17.100.130	196.17.100.131
196.17.100.132	196.17.100.133	196.17.100.134	196.17.100.135	196.17.100.136	196.17.100.137
196.17.100.138	196.17.100.139	196.17.100.140	196.17.100.141	196.17.100.142	196.17.100.143
196.17.100.144	196.17.100.145	196.17.100.146	196.17.100.147	196.17.100.148	196.17.100.149
196.17.100.150	196.17.100.151	196.17.100.152	196.17.100.153	196.17.100.154	196.17.100.155
196.17.100.156	196.17.100.157	196.17.100.158	196.17.100.159	196.17.100.160	196.17.100.161
196.17.100.162	196.17.100.163	196.17.100.164	196.17.100.165	196.17.100.166	196.17.100.167
196.17.100.168	196.17.100.169	196.17.100.170	196.17.100.171	196.17.100.172	196.17.100.173
196.17.100.174	196.17.100.175	196.17.100.176	196.17.100.177	196.17.100.178	196.17.100.179
196.17.100.180	196.17.100.181	196.17.100.182	196.17.100.183	196.17.100.184	196.17.100.185
196.17.100.186	196.17.100.187	196.17.100.188	196.17.100.189	196.17.100.190	196.17.100.191
196.17.100.192	196.17.100.193	196.17.100.194	196.17.100.195	196.17.100.196	196.17.100.197
196.17.100.198	196.17.100.199	196.17.100.200	196.17.100.201	196.17.100.202	196.17.100.203
196.17.100.204	196.17.100.205	196.17.100.206	196.17.100.207	196.17.100.208	196.17.100.209
196.17.100.210	196.17.100.211	196.17.100.212	196.17.100.213	196.17.100.214	196.17.100.215
196.17.100.216	196.17.100.217	196.17.100.218	196.17.100.219	196.17.100.220	196.17.100.221
196.17.100.222	196.17.100.223	196.17.100.224	196.17.100.225	196.17.100.226	196.17.100.227
196.17.100.228	196.17.100.229	196.17.100.230	196.17.100.231	196.17.100.232	196.17.100.233
196.17.100.234	196.17.100.235	196.17.100.236	196.17.100.237	196.17.100.238	196.17.100.239
196.17.100.240	196.17.100.241	196.17.100.242	196.17.100.243	196.17.100.244	196.17.100.245
196.17.100.246	196.17.100.247	196.17.100.248	196.17.100.249	196.17.100.250	196.17.100.251
196.17.100.252	196.17.100.253	196.17.100.254	196.17.100.255		

«« 196.15.255.0 « 196.17.99.255 - Prev IP Range Next IP Range - 196.17.101.0 » 196.20.0.0 »»

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Exhibit D

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

Judge Thomas A. Delaney

THE CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON and DOES 1 through 60,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC

DECLARATION OF MEA KLEIN IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; Declaration of Kimberly Hall Barlow; Request for Judicial Notice; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

DECLARATION OF MEAH KLEIN

I, Mea Klein, state and declare:

1. I am an adult, over the age of eighteen years, and I can truthfully testify to the following information of my own personal knowledge and belief.

2. I am the Assistant City Clerk for the City of Fullerton. I have held my position for 10 years. Prior to my current position, I was employed as the Deputy City Clerk at the City of Fullerton for one year and as a Clerical with the department for two years prior to that.

3. My educational background consists of some college courses after graduating from high school.

4. My duties in my present position involve assisting with the preparation of the City Council agendas; processing resolutions, minutes and ordinances; performing normal clerical duties (phones, counter work, filing, ordering supplies, paying invoices, processing petty cash deposits); receiving and logging claims and summons; processing bond information; logging and filing vehicle titles and registrations for all city vehicles; receiving and logging incoming proof of insurance documentation for massage businesses; working with American Legal to codify the city's ordinances; as well as overseeing the collection of City documents that are responsive to Public Records Act ("PRA") requests received by the City and the ultimate production of responsive documents after they have been reviewed by the City's legal counsel for applicable privileges and exemptions, where appropriate. I have been involved in responding to PRA requests and the production of responsive public documents to PRA requesters since 2006.

5. When the City receives a PRA request, the City Clerk's Office handles the initial intake of the PRA request; assigns a PRA number to the request; and assigns individuals with the responsibility of collecting materials in response to the request depending on the subject matter of the request. Certain departments within the City handle their own responses to PRA requests, notably the Fire Department and the Police Department. In those cases where the ultimate response is made at the Police Department level, I coordinate the timing of the response with the Police

Department to ensure a timely response is made. The Fire Department handles the intake and response to PRA requests that seek Fire Department documents. The Fire Department logs their public records responses separately. If I receive the initial PRA request directly, or if the Fire Department is included in a PRA asking for information from multiple departments, I will notate it and assign it a number on my log sheet.

6. For requests that do not generate a high volume of responsive documents, the City typically produces responsive documents via emails attaching PDF or other file attachments.

7. Because some of the PRA requests the City received in recent years called for the collection of voluminous potentially responsive public records, the City began using a cloud-based internet sharing service called Dropbox to collect and to produce responsive public records to PRA requesters, at the end of 2017, for those requests that generated large numbers of potentially responsive documents. The type of PRA requests that typically generated the volume of responsive documents that would necessitate a production via a Dropbox folder generally involved requests for emails and email attachments containing certain requested search terms. Generally, between the end of 2017 and June 2019, the City created Dropbox folders to house: (1) potentially responsive documents in response to PRA requests, for attorney review; and (2) documents ready to be produced in response to a PRA request.

8. When the City Clerk's Office handles the collection and production for a particular PRA request, it takes the following steps: (1) the office communicates with the requester if the request is too vague or too broad, asking the requester to narrow or clarify the request; (2) it collects potentially responsive documents from relevant individuals and departments; (3) when necessary, it works with the City's legal counsel to determine whether any potentially responsive documents contain information subject to applicable privileges and exemptions under the Public Records Act (Cal. Gov't Code § 6250 et seq.) that should be withheld or redacted, such as emails and other records, and applies any necessary redactions; and (4) once review has been completed for responsiveness and applicable privileges and exemptions, it either (a) produces the responsive documents to the requester, (b) informs the requester if no responsive records are available, or (c) informs the requester the request must be further narrowed if the request is still too broad.

9. Based on my involvement in responding to PRA requests for the City and my interaction with the City's legal counsel, I am aware that document collection by the City in response to PRA requests can, and often does, result in documents being collected that contain private, confidential and privileged information and communications that are not proper for, nor required to be, produced by the City to a requester. As such, the City needs its legal counsel to review the collection – unless it is too burdensome due to the size of the collection – in order to remove or redact confidential, private or privileged information that is not subject to production under the Public Records Act. This includes such confidential information as social security and driver's license numbers and other private information relating to City staff, internal personnel matters and files, closed session reports to the City Council, and privileged communications of City staff and officials with the City's legal counsel.

10. As mentioned, PRA requests asking that certain search terms be run against the City's email server were the most common type of PRA requests that necessitated the use of Dropbox for both (1) storing potentially responsive documents for attorney review; and (2) storing final responsive documents ready for production. When the City received a PRA request for email search terms, the following steps were followed:

a. If the request for email search terms was too vague or broad to be run as requested, the City typically asked the requester to clarify or narrow the request;

b. If the email search term request was intelligible and capable of being run, the City's IT department performed the search(es) and reported back to the City Clerk's Office and legal counsel on the volume of the potentially responsive documents returned by the requested search terms. I am informed that if the volume of the returned emails was too high (e.g., over 5,000 to 10,000 emails[1] (not including attachments)), the City typically: (1) advised the requester that the requested search terms were overbroad and yielded too many potentially responsive documents as worded; and (2) invited the requester to either

[1] The volume of emails (not including attachments) considered too high to review depended on the scope of the requested search terms. If the requested search terms included terms likely to bring in a high volume of privileged or privacy protected documents (e.g., "retention" or "personnel"), even a lower volume of 5,000 would have been too burdensome to review, as a review of that many emails plus attachments would necessarily require extensive attorney time for review.

narrow the scope of the request or pay for the employee and/or attorney time necessary to run the requested searches and to review the potentially responsive documents for applicable privileges and exemptions;

c. Once the requested search terms were narrowed and defined enough to be run by the City's Information Technology (IT) department, IT created a Dropbox subfolder containing the results of the requested search terms in the form of PST files, and shared the link with the City's legal counsel, for purposes of reviewing the potentially responsive documents for responsiveness and applicable privileges and exemptions;

d. The City's legal counsel would then look at the volume and population of the potentially responsive documents and estimate the number of hours it would take to review and redact the documents for production.

e. If the volume of the potentially responsive documents and the cost to review and produce the records was reasonable, the City's counsel reviewed and redacted the potentially responsive documents and authorized the City to produce any responsive records not subject to an applicable privilege or exemption under the Public Records Act. If the volume of the responsive records was too high to send via email, the City's IT department created a Dropbox subfolder and corresponding link to that subfolder for emailing to the requester. If the volume of the responsive records was low enough to be sent via email, the City Clerk's Office would typically send the responsive records via email.

11. There were a few occasions where the City inadvertently sent PRA requesters a link to the City's entire Dropbox account, but in each such instance, the PRA requester was provided the name of the specific subfolder containing the responsive documents. In this manner, the City gave the requester permission to access information contained within the specific Dropbox folder referenced in the City's response to their PRA request. (*See, e.g.*, infra, ¶ 13 & Exh. D).

12. I have never given permission or authorization to a PRA requester to do either of the following: (1) to access a file containing the City's initial collection of potentially responsive documents, in PST format, prior to review and approval for production by the City's legal counsel nor (2) to access any file other than the specific file folder that I have identified for them as

responsive to their PRA request.

13. Since December 2017 I have handled the numerous PRA requests that have been made by (1) Joshua Ferguson, which have been submitted both under his personal email address (joshua@joshuaferguson.com) and the email address associated with his podcast called The Hourly Struggle (data@thehourlystruggle.com) and (2) three persons I understand to be associated with Mr. Ferguson, his podcast, or with his internet blog called Friends For Fullerton's Future ("The Blog"), including David Curlee, Sean Paden and Travis Kiger ("his associates.") Among them, they have made approximately 80 PRA requests to the City from January 1, 2017 to the present, and I have handled almost all of their PRA requests.[2] Mr. Ferguson and his associates' roles as authors of the Blog can be verified at the following links:

(a) https://www.fullertonsfuture.org/author/joshua-ferguson/;

(b) https://www.fullertonsfuture.org/author/david-curlee/;

(c) https://www.fullertonsfuture.org/author/sean-paden/; and

(d) https://www.fullertonsfuture.org/author/travis-kiger/.

14. In preparing to provide this declaration, I have reviewed all available email correspondence between the City and Mr. Ferguson and his associates that provided Dropbox links in response to their PRA requests. These consist of two emails sent to Mr. Ferguson and three emails sent to Mr. Curlee that contained Dropbox links to files containing documents responsive to their PRA requests:

a. A true and correct copy of my email to Mr. Curlee dated September 26, 2017, producing a link to a Dropbox subfolder named "Pro-Card.zip" in response to his Public Records Request (PRR) No. 17-387 is attached hereto as Exhibit A;

b. A true and correct copy of my email to David Curlee dated November 27, 2018, producing a link to a Dropbox subfolder in response to PRR No. 18-326 is attached hereto as Exhibit B;

c. A true and correct copy of Matt Foulkes' email to Joshua Ferguson's podcast

[2] Specifically, Mr. Ferguson and his associates submitted 18 PRA requests to the City in 2017, 31 in 2018, and 31 so far in 2019.

email address dated December 12, 2018, producing a link to a Dropbox subfolder in response to PRR No. 18-442 is attached hereto as Exhibit C. (I was a cc recipient of this email);

d. A true and correct copy of my email to Joshua Ferguson's podcast email address (data@thehourlystruggle.com) dated April 9, 2019, producing a link to a Dropbox subfolder in response to PRR No. 19-135 is attached hereto as Exhibit D; and

e. A true and correct copy of Margot Cronce's email to David Curlee dated June 6, 2019, producing a link to the Dropbox outbox in response to PRR No. 19-235 is attached hereto as Exhibit E. In that email, Ms. Cronce provided the name of the specific subfolder containing the documents responsive to Mr. Curlee's request: "PRR Pro Card 5-29-19." (I was a cc recipient of this email).

15. At no time have I granted Mr. Ferguson permission to access file folders on the City's Dropbox account other than the two Dropbox subfolders noted above that were produced to him on December 12, 2018 and April 9, 2019. At no time has the City granted Mr. Curlee permission to access Dropbox subfolders on the City's Dropbox account other than the three subfolders noted above produced to him on September 26, 2017, November 27, 2018 and June 6, 2019. At no time has the City granted either Mr. Ferguson or Mr. Curlee permission to share the above-referenced Dropbox folders produced to them with any other third parties. In my review of emails between the City and Mr. Ferguson or his associates, I have not seen any indication that any other member of the City's staff granted permission to Mr. Ferguson or his associates to access file folders on the City's Dropbox other than file folders they were sent direct links to or specific subfolders they were told contained documents responsive to their PRA requests.

16. The following Dropbox folders and zip files contained PST files within them:

"ACUSA_PRR.zip,"
"JF_PRR_2,"
"JF_PRR20181012,"
"pr1919 - Josh Ferguson,"
"PRR_19-134_data@thehourlystruggle.com,"
"PRR_JF_20181002,"
"PRRS01152019_JF," and

"Tiger_Signal_PRR.zip."[3]

These files were not produced to Mr. Ferguson, and he was not granted permission to access them because these folders were created to store potentially responsive documents collected by IT in PST format, for review by the City's legal counsel prior to production of any documents or responsive materials to Mr. Ferguson.

17. The Dropbox file that is the primary subject of this lawsuit, "pr 1919 – Josh Ferguson" was created by the City's IT Department for the purpose of collecting emails and attachments potentially responsive to a PRA request made by Mr. Ferguson on January 2, 2019 that included very broad search terms, including "Record Retention," "Police Records," "Retention," "Personnel Files," "Deleted Records," "Oversight," "Personnel Records," and "Limitations." The request was not limited as to specific employee emails to search nor as to date scope. (A true and correct copy of Mr. Ferguson's PRA request dated January 2, 2019 is attached hereto as Exhibit F). The file "pr 1919 – Josh Ferguson" was posted to the City's Dropbox account on May 7, 2019 for attorney review.

18. Because of the breadth of Mr. Ferguson's January 2, 2019 PRA request, the City Clerk's Office contacted Mr. Ferguson to ask that he narrow the scope of his search request to specific employees or officials, a specific time frame, and as to search terms. For instance, the City advised him that his requested search term "oversight" would bring in non-responsive emails pertaining to the Oversight Board. (A true and correct copy of the City Clerk's (Lucinda Williams) email to Mr. Ferguson dated January 3, 2019 is attached hereto as Exhibit G. I was a copied recipient of that email).

19. Thereafter, Mr. Ferguson agreed to limit the search to emails of members of the City Council, the City Manager, all Department heads and their secretaries and assistants, narrowing the scope of the request from 500 City employees or officials to 20 City employees or officials.

20. Even with this limitation, however, the search yielded over 11,000 emails (not

[3] The City's IT department uses formulaic file names when it places records in folders and files within its Dropbox account. For instance, the term "PRR" refers to records gathered in response to a public records request and the requester's name or initials is often used within the folder or file name. In the case of Mr. Ferguson, the City often included his initials "JF" or "Ferguson" or "data@thehourlystruggle.com.zip" in the names of those folders and files placed in Dropbox containing documents potentially responsive to one of his many PRA requests.

including attachments). I am aware that the IT department uploaded the 11,000 emails plus attachments in PST format to a folder within the City's Dropbox account for review by Deputy City Attorney Ivy Tsai. While legal review of the collected documents was always the practice of the City, because the search terms included "police records," "personnel files," "oversight" "record retention" and "personnel records" the search not only yielded a collection of more than 11,000 emails plus attachments, but was also certain to contain private, confidential and privileged information about City staff that made legal review absolutely necessary. See Cal. Gov't Code § 6254(c) (exempting personnel records from disclosure under the Public Records Act due to privacy rights and concerns).

21. I was not in the office at the time, but on May 24, 2019, I received the attached copy of an email from City Clerk Lucinda Williams to Mr. Ferguson, explaining to him that: (a) his request was unduly burdensome due to the size of the data that his broad search terms had generated; and (b) the collection likely contained private, confidential and privileged material, which required over 100 hours of review by legal counsel at an hourly rate of $199.83 and which had not been undertaken due to the burden it would cause the City. (A true and correct copy of the City Clerk's email to Mr. Ferguson dated May 24, 2019 is attached hereto as Exhibit H. I was a copied recipient of that email). Mr. Ferguson replied that he would consult with his attorney and get back to Ms. Williams. (A true and correct copy of Mr. Ferguson's email response to Ms. Williams dated May 24, 2019 is attached hereto as Exhibit I). The City did not hear back from Mr. Ferguson regarding this request after that.

22. Ms. Williams's email did not give Mr. Ferguson permission to access any file on the City's Dropbox account. It did the opposite by informing him that his request yielded over 11,000 emails (not counting attachments) and required extensive review by the City's legal counsel before any documents could be produced to him.

23. The folder named "ACUSA_PRR.zip" was created as a response to PRR No. 17-172 made by Air Combat USA, Inc. and was not produced to Mr. Ferguson or any of his associates.

///

///

24. Defendant Joshua Ferguson recently filed a Petition for Writ of Mandate against the City of Fullerton on October 10, 2019 (Orange County Superior Court Case No. 30-2019-01103679-CU-WM-CJC). The City was served with a copy of the Writ on October 17, 2019. Attached as Exhibit E to the Writ is a copy of a privileged and confidential draft settlement agreement. The City does not generally produce draft settlement agreements in response to Public Records Act requests, as such documents are considered to be privileged and/or otherwise exempt from the Public Records Act. The City would not have produced such a document to Ferguson. See Cal. Gov't Code § 6254(a), (c).

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of October 2019 at Fullerton, California.

Mea Klein

EXHIBIT A

From: Mea Klein
To: David Curlee (dcurlee@gmail.com)
Subject: Response to Public Record Request
Date: Tuesday, September 26, 2017 3:30:40 PM

Hi David,

Below is the link for the Procurement Card Statements and Reconciliation Logs.

Password: Fullerton!

https://www.dropbox.com/sh/sozl29ka9ruft5f/AAAlF09tTMUoAksBvdrwOJlsa?dl=0&preview=Pro-Card.zip

Thank you

Mea Klein
Assistant City Clerk
City of Fullerton
714-738-6571

EXHIBIT B

From:	Mea Klein
To:	David Curlee (dcurlee@gmail.com)
Subject:	18-326 Response to Records Request
Date:	Tuesday, November 27, 2018 4:47:08 PM
Attachments:	image003.jpg

Hi David,

The e-mails you requested are available at the following link:
https://www.dropbox.com/sh/sozl29ka9ruft5f/AAACCqJKQq1MuaJ4CpmXFJI5a/PPR_18_326_Curlee.zip?dl=0

Certain e-mails are being redacted to withhold only personal cell phone numbers pursuant to Government Code section 6255. Those e-mails will be produced to you no later than November 29, 2018.

Have a nice evening!

Mea Klein
Assistant City Clerk
City of Fullerton
714-738-6571

images[6]

EXHIBIT C

From:	Matt Foulkes
To:	"data@thehourlystruggle.com"
Cc:	Mea Klein
Subject:	RE: PRR 11 December 2018 - RESPONSE
Date:	Wednesday, December 12, 2018 4:15:51 PM

Good afternoon – The files that you have requested exceed the maximum limit for e-mailing so I have placed them in a Dropbox. They can be accessed from the link below. Please let me know if you have trouble opening the files.

https://www.dropbox.com/sh/7w3qxzsem5dy30o/AAAPeXjh_JmChAOs8d66TUfTa?dl=0

Sincerely,

Matt Foulkes

Planning Manager | Community Development Department

City of Fullerton

714.738.6878

MattF@cityoffullerton.com

From: data@thehourlystruggle.com [mailto:data@thehourlystruggle.com]

Sent: Tuesday, December 11, 2018 4:18 PM

To: Mea Klein

Cc: Lucinda M. Williams ; Matt Foulkes

Subject: PRR 11 December 2018

The following is a public records request pursuant to Govt. Code §6250, et seq.

In each instance, I am requesting electronic files in original formats. Please send the files to data@thehourlystruggle.com.

1. A list of all noise studies performed in the Downtown Fullerton area consisting of the special plan area, the transportation center, the C-3 zone and all other areas commonly referenced as “downtown", when they were performed and the results therein including reports provided by consultants.

Thank you for your time.

EXHIBIT D

Monica Choi Arredondo

From: Mea Klein <MeaK@ci.fullerton.ca.us>
Sent: Tuesday, April 9, 2019 5:29 PM
To: 'data@thehourlystruggle.com'
Subject: Response to Records Request 19-135 - Florentine's

Please click on the link below to find a response to your records request.

Other records are still being reviewed and will be sent next week.

https://www.dropbox.com/sh/sozl29ka9ruft5f/AAAlF09tTMUoAksBvdrwOJlsa?dl=0

See: 19-135 Datathehourlystruggle.com

Thank you!

Mea Klein
Assistant City Clerk
City of Fullerton
714-738-6571

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

EXHIBIT E

From: Margot Cronce
To: David Curlee
Cc: Claire Moynihan; Mea Klein; Susana Barrios
Subject: RE: Pro-card statements
Date: Thursday, June 6, 2019 4:10:46 PM
Importance: High

Hi David,
The zipped file for the pro card statements has been placed in the drop box.
The **file name** is: **PRR Pro Card 5-29-19**
Here's the **link: http://cityoffullerton.com/outbox**

The **password** to unzip the file is: **Full3rt0n!**
Please let me know if you have any problems retrieving the file.
Thank you,
Margot Cronce I Purchasing Manager I City of Fullerton
303 W. Commonwealth Avenue I Fullerton CA 92832
Ph: 714/738-6535 I Fax: 714/738-3168 I margotc@cityoffullerton.com

From: David Curlee [mailto:dcurlee@gmail.com]
Sent: Tuesday, June 04, 2019 10:41 AM
To: Margot Cronce
Cc: Claire Moynihan
Subject: Re: Pro-card statements

Yes, the statements and spreadsheets first. If you could put them on the Dropbox like the last time, that would be great.
Dave

On Tue, Jun 4, 2019, 10:37 AM Margot Cronce <MargotC@ci.fullerton.ca.us> wrote:

> Hi David,
> We're working on your request. Do you initially want to review the statements and the spreadsheets?
> We can pull any specific backup you would like to see after you have a chance to review them.
> Thanks,
> **Margot Cronce I Purchasing Manager I City of Fullerton**
> **303 W. Commonwealth Avenue I Fullerton CA 92832**
> **Ph: 714/738-6535 I Fax: 714/738-3168 I margotc@cityoffullerton.com**
>
> **From:** Michael O'Kelly
> **Sent:** Thursday, May 30, 2019 1:00 PM
> **To:** Margot Cronce <MargotC@ci.fullerton.ca.us>; Claire Moynihan <CMoynihan@cityoffullerton.com>
> **Subject:** Fwd: Pro-card statements
>
> FYI
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** David Curlee <dcurlee@gmail.com>
> > **Date:** May 30, 2019 at 10:49:34 AM PDT
> > **To:** "Michael O'Kelly" <mokelly@cityoffullerton.com>
> > **Subject: Re: Pro-card statements**
> >
> > Hi Mike,
> > Maybe you can ride Metrolink to Commerce and Uber from there?
> > Julia was able to get ahold of statements with the card numbers already redacted by US Bank, like this one. I'd like to see the same format, if available.
> > Thanks,
> > Dave
> >
> > Screen Shot 05-30-19 at 10.45 AM.GIF
>
> On Wed, May 29, 2019 at 7:46 PM Michael O'Kelly <mokelly@cityoffullerton.com> wrote:
>
> > Hi David,
> > Thanks, the new job is a great opportunity for me from a career perspective. I'll have to figure out a living situation closer to work since the Metrolink isn't really viable!
> >
> > I spoke to our Procurement Manager and while the statements have been scanned, she mentioned that there could be some credit card account number info that needs review/redacting first. I'll get back to you tomorrow with an idea of how that might impact providing you the info. It may mean that we'll need to do a few months of statements at a time or something, but we'll see and get it figured out.
> > Thanks, Mike
> >
> > Sent from my iPhone
> >
> > > On May 29, 2019, at 11:48 AM, David Curlee <dcurlee@gmail.com> wrote:
> > >

> Hi Mike,
>
> Congratulations on your new job. Hope it's a good move for you, though I don't envy your longer commute.
>
> Several months ago, you said you could put pro-card statements on the Dropbox for download. I'd really appreciate that. One year of statements ok?
>
> Thanks,
> David

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

EXHIBIT F

From:	joshua@joshuaferguson.com
To:	Mea Klein
Cc:	Lucinda M. Williams; Kenneth Domer
Subject:	02 January 2019 Records Request - Retention
Date:	Wednesday, January 2, 2019 9:59:31 PM

The following is a public records request pursuant to Govt. Code §6250, et seq.

In each instance, I am requesting electronic files. If the size of the requested items is prohibitive for e-mailing purposes, please provide the items on a CD or DVD disc, which I will pay for, if necessary. Otherwise, please send the files to joshua@joshuaferguson.com.

1. Any and all emails and texts from city connected, issued or employee used devices which include any of the phrases: “Record Retention”, ”Police Records”, “Retention”, “Personnel Files”, “Deleted Records”, “Oversight”, “Personnel Records”, “Limitations".

Please provide any portion of this request as the items become available.

Thank you for your time,

Joshua Ferguson

EXHIBIT G

From: Lucinda M. Williams
To: joshua@joshuaferguson.com
Cc: Mea Klein
Subject: RE: 02 January 2019 Records Request - Retention - Lucindas email to req.
Date: Thursday, January 3, 2019 2:22:28 PM

Happy New Year and thank you for your public records request.
You have made a very broad request in that the City of Fullerton has over 500 current employees and with the scope of your request being "any" of the provided terms, we likely have thousands, if not tens of thousands, of emails containing those search terms. A good deal of those emails would have no relation to what it appears you're interested in given all of the search terms provided. For example, a search for emails and texts containing "oversight" would generate all emails and texts pertaining to the Oversight Board, which does not appear to be the records you seek.
If you would please narrow your request and provide names of the employees whose emails you seek, the time frame and/or subject matter, we can conduct a more focused search and provide responsive records to you in a more timely manner.
If you have any questions, please don't hesitate to contact me.
Thank you!

From: joshua@joshuaferguson.com [mailto:joshua@joshuaferguson.com]
Sent: Wednesday, January 02, 2019 9:59 PM
To: Mea Klein
Cc: Lucinda M. Williams ; Kenneth Domer
Subject: 02 January 2019 Records Request - Retention
The following is a public records request pursuant to Govt. Code §6250, et seq.

In each instance, I am requesting electronic files. If the size of the requested items is prohibitive for e-mailing purposes, please provide the items on a CD or DVD disc, which I will pay for, if necessary. Otherwise, please send the files to joshua@joshuaferguson.com.

1. Any and all emails and texts from city connected, issued or employee used devices which include any of the phrases: "Record Retention", "Police Records", "Retention", "Personnel Files", "Deleted Records", "Oversight", "Personnel Records", "Limitations".
Please provide any portion of this request as the items become available.

Thank you for your time,

Joshua Ferguson

EXHIBIT H

From:	LucindaW@ci.fullerton.ca.us
To:	data@thehourlystruggle.com
Cc:	MeaK@ci.fullerton.ca.us
Subject:	FW: 19-208 Joshua Ferguson
Date:	Friday, May 24, 2019 4:59:48 PM
Attachments:	Fullerton Records Request - 14 May 2019.msg Re Fullerton Records Request - 14 May 2019.msg
Importance:	High

Mr. Ferguson,

This email is in response to your public records requests numbered 19-208 and 19-19, wherein you seek emails containing various search terms with no date range. Upon request for clarification, you narrowed the requested emails to those of the City Council, City Manager, department heads, and their assistants and secretaries. The City has attempted to fulfill PRR 19-19 and has found that it is overly burdensome pursuant to Government Code section 6255 (see American Civil Liberties Union Foundation v. Deukmejian, 32 Cal. 3d 440 (1982)). Due to the number of individual search terms and persons whose emails you seek, IT staff ran a number of email searches in an attempt to capture all potentially responsive emails and was able to isolate approximately 11,000 emails but cannot confirm whether this represents all potential responsive emails. Even having figured out how to best run the search, it is estimated that the IT search alone for this type of request would take approximately 4 hours of staff time at the fully burdened rate of $61.80/hr. Although your requests seem to relate to specific subject matters, because you seek emails containing any one of the various specified search terms, numerous emails are captured in a search, and the emails may relate personnel matters, attorney-client privileged matters, or other confidential information, requiring attorney time to review the emails prior to production, at an hourly rate of $199.83. Such review can be quick or lengthy depending on the nature of the emails, including attachments, but even a very quick review of 11,000 emails would conservatively require over 100 hours of attorney time.

It also does not appear that receiving a voluminous number of unrelated emails containing one of the specified search terms would meet the intent of your request, but we ask for clarification from you. We are more able to provide you with the emails you seek if you limit the number of individuals (each one is a separate search) and clarify if you seek emails relating to a certain subject matter rather than fulfilling any one of a number of search terms. Our intent in providing this information is to facilitate your records requests so that we are able to identify and produce responsive records.

EXHIBIT I

From: data@thehourlystruggle.com
To: Lucinda M. Williams
Cc: Mea Klein
Subject: Re: 19-208 Joshua Ferguson
Date: Friday, May 24, 2019 5:26:42 PM

I will consult with my attorney and be in touch.

On May 24, 2019, at 16:59, Lucinda M. Williams <LucindaW@ci.fullerton.ca.us> wrote:

> Mr. Ferguson,
>
> This email is in response to your public records requests numbered 19-208 and 19-19, wherein you seek emails containing various search terms with no date range. Upon request for clarification, you narrowed the requested emails to those of the City Council, City Manager, department heads, and their assistants and secretaries. The City has attempted to fulfill PRR 19-19 and has found that it is overly burdensome pursuant to Government Code section 6255 (see American Civil Liberties Union Foundation v. Deukmejian, 32 Cal. 3d 440 (1982)). Due to the number of individual search terms and persons whose emails you seek, IT staff ran a number of email searches in an attempt to capture all potentially responsive emails and was able to isolate approximately 11,000 emails but cannot confirm whether this represents all potential responsive emails. Even having figured out how to best run the search, it is estimated that the IT search alone for this type of request would take approximately 4 hours of staff time at the fully burdened rate of $61.80/hr. Although your requests seem to relate to specific subject matters, because you seek emails containing any one of the various specified search terms, numerous emails are captured in a search, and the emails may relate personnel matters, attorney-client privileged matters, or other confidential information, requiring attorney time to review the emails prior to production, at an hourly rate of $199.83. Such review can be quick or lengthy depending on the nature of the emails, including attachments, but even a very quick review of 11,000 emails would conservatively require over 100 hours of attorney time.
>
> It also does not appear that receiving a voluminous number of unrelated emails containing one of the specified search terms would meet the intent of your request, but we ask for clarification from you. We are more able to provide you with the emails you seek if you limit the number of individuals (each one is a separate search) and clarify if you seek emails relating to a certain subject matter rather than fulfilling any one of a number of search terms. Our intent in providing this information is to facilitate your records requests so that we are able to identify and produce responsive records.
>
> This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail.

Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

<mime-attachment>

<mime-attachment>

Exhibit E

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 7

JONES & MAYER
Kimberly Hall Barlow, Esq. SBN 149902
khb@jones-mayer.com
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bal@jones-mayer.com
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mca@jones-mayer.com3777 North Harbor Boulevard
Fullerton, CA 92835
Telephone: (714) 446-1400
Facsimile: (714) 446-1448

Attorneys for Plaintiff
CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

Judge Thomas A. Delaney

THE CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON and DOES 1 through 60,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC

DECLARATION OF STEVE LEE IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Bruce A. Lindsay; Declaration of Kimberly Hall Barlow; Request for Judicial Notice; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

DECLARATION OF STEVE LEE

I, Steve Lee, state and declare:

1. I am an adult, over the age of eighteen years, and I can truthfully testify to the following information of my own personal knowledge and belief.

2. I have been the Managing Partner and Founder of Glass Box Technology ("Glass Box") since 2012. Glass Box has been retained by the City of Fullerton ("the City") to audit, assess and consult on the security of the City's Information Technology, including its local area networks (LANs), work stations, servers and data storage. Glass Box offers customizable network, storage, security, and server solutions designed to meet the needs of the industries and customers it serves.

3. My education, employment and experience in the field of computer technology include: over 30 years of experience in sales management and IT for various IT and telecommunications companies, including MCI Telecommunications, Internap Network Services and Brocade Networks.

4. Marty Miller, Chief Information Officer (CIO) for Glass Box, is overseeing the City of Fullerton project and the measures needed to effectuate the necessary fixes. He has nearly 20 years of experience in the IT industry, and managed IT in such companies as Ingram Micro, Inc., Prospect Medical Systems, St. Joseph's Health System, Children's Hospital of Los Angeles (where he served as Vice President and CIO from 2012 to 2014, Chief Technology Officer from 2008 to 2012 and Director of Infrastructure Services from 2006 to 2008), Advanced ICU Care, T2 Tech Group, and Envision Health Technology Advisors. While at Children's Hospital of Los Angeles, Marty was named among 2014's Top 20 Most Innovative Midmarket CIOs.

5. During Glass Box's initial assessment of the City's computer network and related systems, Marty and I identified certain areas of vulnerabilities that leave the City vulnerable to internal and external cyber attacks, data theft and hacking.

6. We recommended that the City initiate multiple measures to secure its computer network in order to remove the vulnerabilities within it. We estimated that these measures would

take approximately thirty days to install and/or incorporate, which meant that the City's network would not be secured and protected against internal and external cyber attacks, data theft and hacking for that period of time.

7. As such, Marty and I recommended that the City not do anything that would potentially alert hackers to its vulnerabilities. This included holding off on instituting its lawsuit to recover data stolen from its Dropbox file sharing account and notifying individuals affected by the Dropbox data breach until these vulnerabilities could be addressed and fixed. Of course, such a lawsuit would be a matter of public record and, given the subject matter and the parties involved, could very likely attract the attention of the media.

8. Filing a lawsuit and sending out notifications of the data breach before fixing the vulnerabilities would have left the City open to cyber attacks by hackers who would be alerted to the vulnerabilities within the City's computer system. Marty and I strongly believe that such a lawsuit, filed before fixes were in place, would be a signal to would-be hackers that the City is vulnerable to cyber attacks and hacking, as it would be a matter of public record.

9. If hackers had engaged in any such attacks against the City's network prior to Glass Box being able to fix the City's network vulnerabilities, it could have had disastrous and costly results for the City. Hackers have been known to utilize ransomware and have commandeered entire computer networks pending payment by the victim. For example, hackers incapacitated the computer network of the Orange County Transportation Authority for two and a half days in 2016, costing that agency $660,000 in damages. (See https://www.ocregister.com/2016/08/05/cyberattack-cost-octa-660000-to-fix-held-servers-for-ransom/). The Montebello Unified School District was also hacked on July 11 of this year. Some IT functions were still not restored as of the second week of school on September 6. (See https://schurrscroll.com/2019/09/06/district-computers-hacked/). These type of actions against the City should be avoided to the fullest extent possible.

9. For this reason, we believe that it would have been very unwise, if not careless, for the City to file and prosecute its lawsuit against Friends for Fullerton's Future and the other defendants before the vulnerabilities within the City's computer network could be fixed, which

resulted in a delay of approximately one month in initiation of this lawsuit.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 23th day of October 2019 at Laguna Beach, California.

Steve Lee

Exhibit F

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 6

JONES & MAYER
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Attorneys for Defendant
CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC
Judge Thomas A. Delaney

DECLARATION OF BRUCE A. LINDSAY IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Kimberly Hall Barlow; Request for Judicial Notice; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

DECLARATION OF BRUCE A. LINDSAY

I, Bruce A. Lindsay, Esq., declare:

1. I am an attorney at law authorized to practice law before all of the courts of the State of California, and am an attorney with the law firm of Jones & Mayer, which is the City Attorney for the City of Fullerton (the City) and is counsel of record for the City in the above-captioned matter. I make this Declaration in support of Plaintiff's Ex Parte Application for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued. I am familiar with the files and records in this matter. If called as a witness, I could and would competently testify to the following, as I have personal knowledge of the facts as set forth herein below.

2. Pursuant to this Court's procedure for seeking ex parte relief concurrently with filing a complaint, the City brings its ex parte application for a Temporary Restraining Order as the Defendants in the lawsuit are unlawfully in possession of confidential, private and privileged City documents that they knowingly accessed, took, copied, and otherwise used data from the City's non-public Dropbox account without the City's permission. Defendants also knowingly and without permission provided or assisted in providing a means for, or caused, other co-conspirators to do the same. The Defendants are using confidential, private and privileged materials and information gathered from such materials in the form of Blog postings on the Blog "Friends for Fullerton's Future."

3. I am aware from my review of the records of our office, that on June 13, 2019, City Prosecutor Gregory P. Palmer of Jones & Mayer sent Joshua Ferguson and the Blog a cease and desist letter asking them to remove the confidential documents posted to the Blog; that they refrain from posting any other confidential documents illegally obtained by the Blog; that they immediately return all confidential documents illegally obtained by the Blog; and that they immediately delete all electronic copies of any confidential documents illegally obtained by the Blog. (A true and correct copy of Mr. Palmer's June 13, 2019 email to Mr. Ferguson and the Blog is attached hereto as Exhibit "A").

4. On June 14, 2019, Defendant Ferguson responded to the City's June 13, 2019 cease and desist email by referring the City to the Blog's attorney, Kelly Aviles. (A true and correct copy of Ferguson's email response is attached hereto as Exhibit "B").

5. On July 11, 2019, I sent Kelly Aviles, counsel for Mr. Ferguson and the Blog a follow-up cease and desist letter, specifically invoking Government Code section 6204, *et seq*. and Penal Code section 502(c) and (e). The July 11, 2019 letter also identified the records to be returned to the City as follows: "Any and all records obtained from the City of Fullerton's Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson or any of FFFF's agents or associates through an emailed link, including, but not limited to, records contained in a folder named "pr1919 – Josh Ferguson." The letter also asked Mr. Ferguson and the Blog to: (1) return the documents contained in said Dropbox folder within 20 days; or (2) respond in writing explaining why the identified records do not belong to the City of Fullerton. Many of the documents contained in the referenced Dropbox folder were exempted from disclosure under the Public Records Act because of their confidential, private and/or privileged nature. (A true and correct copy of my July 11, 2019 letter to Ms. Aviles is attached hereto as Exhibit "C").

6. On July 31, 2019, Ms. Aviles responded on behalf of Mr. Ferguson and the Blog. In her letter, Ms. Aviles: (1) denied that the documents at issue were unlawfully obtained; (2) claimed the description of the documents at issue was unclear; and (3) claimed the information published was protected by the California Shield Law and the First Amendment-based Reporter's Privilege. (A true and correct copy of Ms. Aviles's July 31, 2019 letter is attached hereto as Exhibit "D").

7. As the concurrently filed declaration of Matthew Strebe establishes, Mr. Ferguson routinely accessed City documents in its Dropbox account, commencing December 28, 2017, at first using his own computer and eventually using anonymizing internet services to mask his identity. Mr. Strebe was able to determine that Mr. Ferguson used European anonymizing services as he accessed files on the City's Dropbox account. The declaration of Mea Klein establishes that Mr. Ferguson was not given permission by the City to access the files that he was accessing on the City's Dropbox with the exception of two files that she identifies in her declaration. The other files

that he has accessed, as identified in Mr. Strebe's declaration, have also been without the permission of the City and are each a violation of Penal Code section 502.

8. The City has already incurred well over $5,000 in damages, including but not limited to the following: (1) the continuing costs connected with the investigation of the source, nature and scope of the theft of the City's confidential and privileged records; and (2) the continuing costs of pursuing this action against the Defendants to prevent further publication of privileged and confidential records and information taken from the City's Dropbox account without authorization and to recover the records taken. The City anticipates will also face the costs of notifying each person whose confidential information has been improperly and illegally accessed by the Defendants, in violation of their right to privacy, and may also face the following future damages: (1) the costs of defending any data breach claims brought by any person whose confidential information was improperly and illegally accessed by the Defendants; and (2) the costs of defending any claims from current and former employees stemming from the unauthorized release and/or publication of their confidential information.

9. The City and its current and former employees and other third parties whose privileged and confidential records and information were stolen by and are in the unauthorized possession of the Defendants face both "irreparable harm" and "immediate danger" if ex parte relief is not granted. Some of their privileged and confidential information has already been published on the Blog by the Defendants, and additional privileged and confidential information in Defendants' unlawful possession may continue to be published by the Defendants, if they are not immediately restrained from doing so. The Blog has posted excerpts of numerous privileged and confidential documents unlawfully obtained from the City's Dropbox file sharing account from June 11, 2019 to September 17, 2019. (See the concurrently filed Declaration of Matthew Strebe, at ¶¶ 75-84, for examples of Blog posts reflecting excerpts from privileged and confidential City documents taken from the City's Dropbox account). Since Defendants have refused to return the materials that they have taken from the City's Dropbox account, Defendants can continue posting copies of the unlawfully obtained documents at any time unless this Court issues the requested Temporary Restraining Order and thereafter enjoins them from publishing such information. As

such, the City and its current and former employees and other third parties continue to face the imminent threat of public disclosure of their privileged and private information. Mere monetary damages awarded after final resolution of this action will not adequately compensate the City and its current and former employees and other third parties for their damages.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of October 2019 at Fullerton, California.

Bruce A. Lindsay

EXHIBIT A

From:	Gregory P. Palmer
To:	team@fullertonsfuture.org; joshua@joshuaferguson.com
Cc:	KDomer@cityoffullerton.com; GretchenB@cityoffullerton.com; Richard D. Jones; Ivy M. Tsai
Subject:	Cease and Desist
Date:	Thursday, June 13, 2019 8:45:46 PM

Joshua Ferguson
Friends for Fullerton

Re: **Cease and Desist – City of Fullerton Police Department**

Dear Mr. Ferguson,

It has come to the attention of the City of Fullerton that you have recently published on your website documents which have clearly and undoubtedly been sourced from the confidential personnel files of several current and/or former Fullerton Police Officers. The State of California has statutorily recognized this right of confidentiality. (See Penal Code §§ 832.5, 832.7 and 832.8.) Any disclosure of such confidential records is strictly limited and must be authorized by a court order from a Superior Court judge. (See Evidence Code §§ 1043-1047; Pitchess v. Superior Court(1974) 11 Cal.3d 531 and its progeny.) Indeed, the Fullerton Police Department has an affirmative duty to resist attempts at unauthorized disclosure and the officers who are the subject of such records expect their right of privacy will be respected. (See Craig v. Municipal Court for the Inglewood Judicial District et al. (1979) 100 Cal.App.3d 69.) Finally, the improper disclosure of such records is prosecutable as a misdemeanor violation of law under Government Code section 1222 (See Attorney General Opinion, 82 Op. Att'y Gen. 246 (1999).) Any person facilitating the illegal disclosure of such documents in violation of the law may be prosecuted as either a principal in that crime or as an aider and abettor.

For all these reasons the City of Fullerton demands you immediately:

1. Remove these Confidential Documents from Your Blog within one hour of your receipt of this e-mailed cease and desist letter;

2. Refrain from posting any other Confidential Documents illegally obtained to Your Blog in the future:

3. That you immediately send to our office within 24 hours all Confidential Documents you and your employees have in your possession. You are also instructed not to make any copies of the Confidential Documents in any form (including but not limited to electronic, imaged, hard copies, etc.)

3. That you immediately delete all electronic copies of the Confidential Documents in your and your employees' possession.

Your failure to follow these instructions can result in legal action being taken against Friends for Fullerton's Future wherein the City will seek all necessary legal remedies.

We require your immediate compliance with this cease and desist letter. **Notify the undersigned of your compliance with the above within 24 hours of your receipt of this correspondence.**

Thank you for your prompt attention to this matter.

Gregory P. Palmer

City Prosecutor
City of Fullerton

Sent from my iPhone

EXHIBIT B

From:	Joshua Ferguson
To:	Gregory P. Palmer
Cc:	team@fullertonsfuture.org; KDomer@cityoffullerton.com; GretchenB@cityoffullerton.com; Richard D. Jones; Ivy M. Tsai; Kelly Aviles
Subject:	Re: Cease and Desist
Date:	Friday, June 14, 2019 1:05:39 PM

Hello,

The News Organization known as The Friends for Fullerton's Future is represented by council.

Please direct any future correspondence regarding such matters to Kelly Aviles.

Thank you.

On Jun 13, 2019, at 20:45, Gregory P. Palmer <gpp@jones-mayer.com> wrote:

> Joshua Ferguson
>
> Friends for Fullerton
>
> Re: Cease and Desist – City of Fullerton Police Department
>
> Dear Mr. Ferguson,
>
> It has come to the attention of the City of Fullerton that you have recently published on your website documents which have clearly and undoubtedly been sourced from the confidential personnel files of several current and/or former Fullerton Police Officers. The State of California has statutorily recognized this right of confidentiality. (See Penal Code §§ 832.5, 832.7 and 832.8.) Any disclosure of such confidential records is strictly limited and must be authorized by a court order from a Superior Court judge. (See Evidence Code §§ 1043-1047; Pitchess v. Superior Court(1974) 11 Cal.3d 531 and its progeny.) Indeed, the Fullerton Police Department has an affirmative duty to resist attempts at unauthorized disclosure and the officers who are the subject of such records expect their right of privacy will be respected. (See Craig v. Municipal Court for the Inglewood Judicial District et al. (1979) 100 Cal.App.3d 69.) Finally, the improper disclosure of such records is prosecutable as a misdemeanor violation of law under Government Code section 1222 (See Attorney General Opinion, 82 Op. Att'y Gen. 246 (1999).) Any person facilitating the illegal disclosure of such documents in violation of the law may be prosecuted as either a principal in that crime or as an aider and abettor.

For all these reasons the City of Fullerton demands you immediately:

1. Remove these Confidential Documents from Your Blog within one hour of your receipt of this e-mailed cease and desist letter;

2. Refrain from posting any other Confidential Documents illegally obtained to Your Blog in the future:

3. That you immediately send to our office within 24 hours all Confidential Documents you and your employees have in your possession. You are also instructed not to make any copies of the Confidential Documents in any form (including but not limited to electronic, imaged, hard copies, etc.)

3. That you immediately delete all electronic copies of the Confidential Documents in your and your employees' possession.

Your failure to follow these instructions can result in legal action being taken against Friends for Fullerton's Future wherein the City will seek all necessary legal remedies.

We require your immediate compliance with this cease and desist letter. Notify the undersigned of your compliance with the above within 24 hours of your receipt of this correspondence.

Thank you for your prompt attention to this matter.

Gregory P. Palmer

City Prosecutor

City of Fullerton

Sent from my iPhone

This electronic transmission, and any documents attached hereto, may contain confidential and/or legally privileged information. The information is intended only for use by the recipient named above. If you have received this electronic message in error, please notify the sender and delete the electronic message. Any disclosure, copying, distribution, or use of the contents of information received in error is strictly prohibited.

EXHIBIT C

J & M
JONES & MAYER

ATTORNEYS AT LAW

3777 NORTH HARBOR BOULEVARD • FULLERTON, CALIFORNIA 92835
(714) 446-1400 • (562) 697-1751 • FAX (714) 446-1448

Richard D. Jones*
Partners
Martin J. Mayer (1941-2017)
Kimberly Hall Barlow
James R. Touchstone
Thomas P. Duarte
Richard L. Adams II
Christian L. Bettenhausen
Ryan R. Jones

Associates
Monica Choi Arredondo
Melissa M. Ballard
Baron J. Bettenhausen
Jamaar Boyd-Weatherby
Paul R. Coble
Keith F. Collins
David R. Demurjian
Michael Q. Do
Veronica R. Donovan
Kathya M. Firlik
Russell A. Hildebrand
Crystal V. Hodgson
Krista MacNevin Jee**
Gary S. Kranker
Bruce A. Lindsay
Gregory P. Palmer
Scott E. Porter
Harold W. Potter
Tarquin Preziosi
Carrie A. Raven
Jeffrey N. Redd
Brittany E. Roberto
Denise L. Rocawich
Ivy M. Tsai
Carmen Vasquez

Of Counsel
Michael R. Capizzi
Harold DeGraw
Dean J. Pucci
Steven N. Skolnik
Wendy S. Stockton
Peter E. Tracy

*a Professional Law Corporation
**Appellate Specialist

Consultant
Mervin D. Feinstein

July 11, 2019

Kelly Aviles, Esq.
LAW OFFICES OF KELLY AVILES
1502 Foothill Blvd, #103-140
La Verne, CA 91750

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Friends for Fullerton's Future Blog

Dear Ms. Aviles:

As legal counsel for the City of Fullerton, I write, pursuant to California Government Code section 6204 *et seq*., to notify you, as legal counsel to the owner(s) and/or operator(s) of the Friends for Fullerton's Future (FFFF) blog, that the City of Fullerton has reasonable grounds to believe that owner(s) and/or operator(s) of the FFFF blog are in unlawful possession of records belonging to the City of Fullerton. The records were taken and used by FFFF blog owner(s) and/or operator(s) without the City's authorization and fall within the definition of "record" under California Government Code Section 6204(a)(2), as well as the definition of "public records" under California Government Code § 6252(e), and are described as follows:

> Any and all records obtained from the City of Fullerton's Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson or any of FFFF's agents or associates through an emailed link, including, but not limited to, records contained in a folder named "pr1919 - Josh Ferguson."

Therefore, pursuant to Governmentt Code section 6204, within twenty (20) calendar days of receiving this notice, the owner(s) and/or operator(s) of the Friends for Fullerton's Future blog are hereby directed to either:

(1) Return the above-referenced records to the City of Fullerton, as previously requested; or

(2) Respond in writing and declare why the above-referenced records do not belong to the City of Fullerton. If the owner(s) and/or operator(s) of the Friends for Fullerton's Future blog do not deliver the above-described records, or do not respond adequately to this notice and its demand within the required time, we will immediately thereafter petition the Superior Court of Orange County for an order requiring the return of these records.

Cal. Gov't Code § 6204(b).

We further note that the FFFF blog has posted many of the confidential City documents after receipt of our office's June 13, 2019 cease-and-desist email. (A copy of that email is enclosed herein). Many, if not all, of the confidential City records posted to the FFFF blog are explicitly exempted from disclosure under the California Public Records Act, would not have been provided to Mr. Ferguson or FFFF agents or associates in response to a Public Records Act request, and could only have been obtained without the City's express authorization. Such records posted to the FFFF blog are confidential and exempt from disclosure pursuant to the following authorities:

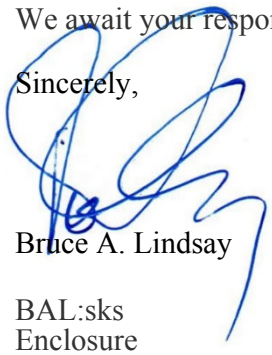
- "Preliminary drafts, notes, or interagency or intra-agency memoranda that are not retained by the public agency in the ordinary course of business, if the public interest in withholding those records clearly outweighs the public interest in disclosure." Cal. Gov't Code § 6254(a);
- "Records pertaining to pending litigation to which the public agency is a party, or to claims made pursuant to Division 3.6 (commencing with Section 810), until the pending litigation or claim has been finally adjudicated or otherwise settled." Cal. Gov't Code § 6254(b);
- "Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy." Cal. Gov't Code § 6254(c);
- Law enforcement investigative records. Cal. Gov't Code § 6254(f); and
- "Records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege." Cal. Gov't Code § 6254(k), which includes the following privileges:
    - Attorney-client privileged records. Cal. Evid. Code 950 et seq.; Roberts v. City of Palmdale, 5 Cal. 4th 363 (1993);
    - Attorney work product. Cal. Civ. Proc. Code § 2018.010 et seq.;
    - Peace officer personnel records. Cal. Penal Code § 832.7 et seq.; and
    - Confidential closed session information. Cal. Gov't Code § 54963.

FFFF's unauthorized access and misuse of the City's clearly privileged and exempted documents constitute a violation of California Penal Code section 502, which grants civil remedies (including compensatory damages, attorney's fees and potential punitive damages) to any persons or entities injured by any violations thereof. See Cal. Pen. Code § 502(c), (e).

As such, unless FFFF complies with the demands set forth in the City's June 13, 2019 cease and desist letter within 24 hours, the City will have no choice but to pursue all criminal and civil remedies available to it under the law.

We await your response.

Sincerely,



Bruce A. Lindsay

BAL:sks
Enclosure
cc: Gary S. Kranker, Esq.
Monica Choi Arredondo, Esq.
Ivy M. Tsai, Esq.

EXHIBIT D

July 31, 2019

via email to bal@jones-mayer.com

Bruce A. Lindsay
JONES & MAYER
3777 North Harbor Blvd.
Fullerton, CA 92835

Dear Mr. Lindsay:

I have been retained in response to your firm's correspondence dated July 11, 2019, regarding the Friends for Fullerton's Future ("Friends") blog and records that were published on the blog that you allege, without any factual support, were taken and are now in the unlawful possession of the owner or owners and/or operator or operators of the blog. Your letter demands that these unnamed individuals return the records or respond in writing and declare why the records do not belong to the City of Fullerton.

First and foremost, your allegations that the blog or anyone connected with the blog has acted unlawfully is offensive and unfounded. To allege otherwise is nothing more than an attempt to smear the blog in retailation for its reporting on the City of Fullerton.

Second, your correspondence vaguely describes the records at issue as as "any and all records obtained from the City of Fullerton's Dropbox account (https://cityoffullerton.com/outbox) that were not directly provided by the City to Joshua Ferguson and or any of FFFF's agents or associates through an emailed link, including but not limited to records contained in a folder named "pr1919 – Josh Ferguson." While you later refer to allegedly confidential documents posted on the blog, you do not cite to any post or specifiy which documents you are referring to. From this discription, I am entirely unclear as to what documents are even at issue.

Third, regardless of what information or documents that the blog, its reporters, operators, or owners may have (if any), it would be defined as "unpublished information" obtained during the course of its reporting on the City of Fullerton. As such, the information is absolutely protected by the California Shield Law and the First Amendment-based Reporter's Privilege.

1502 Foothill Boulevard, Suite 103-140 • La Verne, California 91750
Phone: (909) 991-7560 • Fax: (909) 991-7594 • Email: kaviles@opengovlaw.com

The California Constitution mandates that a journalist does not need to disclose a confidential source or unpublished information. The Shield Law, as set forth in California Constitution, article I, section 2, provides in pertinent part:

> (b) a publisher, editor, reporter, or other person connected with or employed upon a newspaper, magazine, or other periodical publication, or by a press association or wire service, or any person who has been so connected or employed, shall not be adjudged in contempt by a judicial...body having the power to issue subpoenas for refusing to disclose the source of any information procured while so connected or employed for publication in a newspaper ...or for refusing to disclose any unpublished information obtained or prepared in gathering, receiving or processing of information for communication to the public.
>
> As used in this subdivision, "unpublished information" includes information not disseminated to the public by the person from whom disclosure is sought, whether or not related information has been disseminated and includes, but is not limited to, all notes, out takes, photographs, tapes or other data of whatever sort not itself disseminated to the public through a medium of communication whether or not published information based upon or related to such material has been disseminated. (Cal. Const., art. I, § 2, emphasis added; see also, Evid. Code, § 1070 [constitutional provision adopted in response to court rulings attempting to limit the scope of Evidence Code section 1070].)

"Stated more simply, article I, section 2(b) protects a newsperson from being adjudged in contempt for refusing to disclose either: (1) unpublished information, or (2) the source of information, whether published or unpublished." Delaney v. Superior Court (1990) 50 Cal.3d 785, 796-97. The purpose of the Shield Law is "to protect the newsperson's ability to gather and report the news," Id. at 806, fn. 20.

The California Supreme Court has reaffirmed the broad protections afforded to news reporters under the California Shield Law.

> The shield law is, by its own terms,...*absolute* rather than qualified in immunizing a newsperson from contempt for revealing unpublished information obtained in the news gathering process. As we have explained: 'Since contempt is the only effective remedy against a non-party witness, the California enactments [art. I, section 2(b) and Evidence Code section 1070] grant such witnesses *virtually absolute protection* against compelled disclosure.' [Citation.] We implicitly reached the same conclusion in *Delaney, supra,* 50 Cal.3d 785, 268 Cal.Rptr. 753, 789 P.2d 934, in which we held that a criminal defendant's federal constitutional right to a fair trial may in some cases overcome a claim of immunity under the state shield law. *(Id.* at p. 805,268 Cal.Rptr. 753, 789 P.2d 934.) If the shield law itself

> provided for a balancing approach, i.e., a qualified immunity, there would have been no need for us to tum to the federal Constitution.... We find nothing in the shield law's language of history to suggest the immunity from contempt is qualified such that it can be overcome by a showing of need for unpublished information within the scope of the shield law." *(New York Times v. Superior Court* (1990) 51 Cal.3d 453, 461, fn. omitted.)

Miller v. Superior Court (1999) 21 Cal.4th 883, 890-91.

The immunity contained in California's Shield Law is absolute for purposes of any civil proceeding. Id. at 901. Therefore, any documents or information relevant to this case which Friends has not already published (assuming that any such documents or information exist) would be defined as "unpublished information" within the scope of the Shield Law, and therefore, protected from disclosure.

Independently, you cannot satisfy the stringent requirements to overcome the reporter's privilege, which is derived from the First Amendment and the common law. Both the Ninth Circuit and the California Supreme Court have recognized that a qualified First Amendment privilege protects against the compelled disclosure of information from journalists. Shoen v. Shoen (9th Cir. 1994) 5 F.3d 1289, 1293 ("Shoen I"); Mitchell v. Superior Court (1984) 37 Cal. 3d 268, 274. As the Ninth Circuit emphasized, the federal constitutional standard must be rigorous to "ensure that compelled disclosure is the exception, not the rule. ... Indeed, if the privilege does not prevail in all but the most exceptional cases, its value will be substantially diminished." Shoen v. Shoen (9th Cir. 1995) 48 F. 3d 412, 416 ("Shoen II").

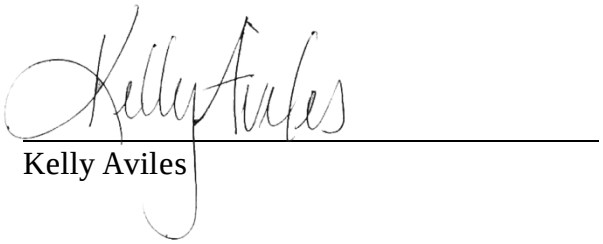
Additionally, the use of information received by the media is fully protected by the First Amendment, as the Supreme Court has held on many occasions. See, e.g., Bartnicki v.Vopper (2001) 532 U.S. 514, 535; Oklahoma Publishing Co. v. District Court (1977) 430 U.S. 308, 309-311; Smith v. Daily Mail Publ. Co. (1979) 443 U.S. 97, 104; Florida Star v. B.J.F. (1989) 491 U.S. 524, 533-537, 546; Braun v. Chronicle Publishing Co. (1997) 52 Cal. App. 4th 1036, 1050 (absolute privilege for reporting on government proceedings and records applies to newspaper report on confidential audit).

Any attempt to force the return of unpublished materials or information is an unconstitutional prior restraint. See Nebraska Press Ass'n v. Stuart (1976) 427 U.S. 539, 559. See also Cohen v. Cowles Media Co. (1991) 501 U.S. 663, 668-69 ("if a newspaper lawfully obtains truthful information about a matter of public significance then state officials may not constitutionally punish publication of the information, absent a need to further a state interest of the highest order....") Last year, the California Court of Appeal upheld this principle and rejected an attempt to prohibit the Los Angeles Times from publishing records it received, despite a claim that those records were confidential. Association for Los Angeles Deputy Sheriffs v. Los Angeles Times Communications LLC (2015) 239 Cal.App.4th 808 (review denied Nov. 18, 2015.) Even the union's claim that the records were illegally obtained by whoever provided them to The Times could not

prevent The Times from reporting on the information its reporters had received. Id. at 818-20. The Court upheld The Times' anti-SLAPP motion, and the union ended up having to reimburse The Times for almost $140,000 in legal fees. Last year, in Monterey County Superior Court, the City of Greenfield attempted a similar lawsuit to recover attorney/client privileged memos. The Court granted our offices' anti-SLAPP motion, resulting in the recovery of attorneys' fees and costs from the City of Greenfield. City of Greenfield v. Monterey County Weekly Newspaper, et al., Case No. 18CV003107.

In summary, because your demand lacks any factual or legal support, Friends will not be taking any of the actions you request. We reserve all our rights, contentions, defenses, legal theories, and remedies, including recovery of our attorneys' fees and costs in any proceeding, should the City move forward in its attempt to silence Friends.

Sincerely,



Kelly Aviles

Exhibit G

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 5

JONES & MAYER
Kimberly Hall Barlow, Esq. SBN 149902
khb@jones-mayer.com
Bruce A. Lindsay, Esq., SBN 102794
bal@jones-mayer.com
Monica Choi Arredondo, Esq., SBN 215847
mca@jones-mayer.com
3777 North Harbor Boulevard
Fullerton, CA 92835
Telephone: (714) 446-1400
Facsimile: (714) 446-1448

Attorneys for Defendant
CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC
Judge Thomas A. Delaney

DECLARATION OF KIMBERLY HALL BARLOW IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; Request for Judicial Notice; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

DECLARATION OF KIMBERLY HALL BARLOW

I, Kimberly Hall Barlow, Esq., declare:

1. I am an attorney at law authorized to practice law before all of the courts of the State of California, and am an attorney with the law firm of Jones & Mayer, which is the City Attorney for the City of Fullerton (the City) and is counsel of record for the City in the above-captioned matter. I make this Declaration in support of Plaintiff's Ex Parte Application for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued. I am familiar with the files and records in this matter. If called as a witness, I could and would competently testify thereto, as I have personal knowledge of the facts as set forth herein below.

2. Pursuant to Rule 3.1202(a), the other parties to this action are listed below. Because Kelly Aviles has been previously identified as counsel for Mr. Ferguson and the Friends for Fullerton's Future Blog, I also included Ms. Aviles in the notice.

a. Plaintiff, City of Fullerton, represented by Kimberly Hall Barlow, Bruce A. Lindsay and Monica Choi Arredondo of JONES & MAYER, 3777 N. Harbor Boulevard, Fullerton, CA 92835, Telephone: 714-446-1400, Facsimile: 714-446-1448, Emails: khb@jones-mayer.com, bal@jones-mayer.com, and mca@jones-mayer.com;

b. Attorney for Defendants Friends for Fullerton's Future and Joshua Ferguson, Kelly Aviles, Esq., LAW OFFICES OF KELLY AVILES, 1502 Foothill Blvd, Suite #103-140, La Verne, CA 91750, Telephone: (909) 991-7560, Email: aviles@opengovlaw.com;

c. Defendant Friends for Fullerton's Future ("the Blog"), PO Box 6250, Fullerton, CA 92834, Email: team@fullertonsfuture.org;

d. Defendant Joshua Ferguson, 201 W. Wilshire Avenue, Apt. D, Fullerton, CA 92832-1862, Telephone: (714) 441.2443, Emails: joshua@joshuaferguson.com, joshua@thehourlystruggle.com, data@thehourlystruggle.com, and info@fullertoncameras.com;

e. Defendant David Curlee, 156 Marion Blvd., Fullerton, CA 92835-3525, Telephone: (714) 871-9738, Email: dcurlee@gmail.com, david@altamontpress.com.

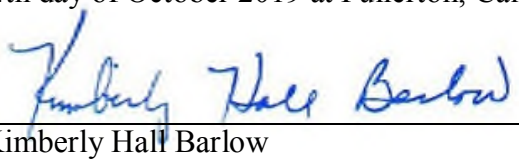
f. Defendant Christopher Tennyson, 1013 W. Malvern Avenue, Fullerton, CA 92833-2427, Telephone: (714) 870-0759, Email: christennyson@gmail.com and info@fullertoncameras.com.

3. On Thursday, October 24, 2019, before 10:00 a.m., I provided proper ex parte notice to the above parties, via all known Email addresses listed above, advising them that on the same day, October 24, 2019, at 1:30 p.m. in the Civil Clerk's Office of the Orange County Superior Court, located at 700 Civic Center Drive West, Santa Ana, California, the City would apply ex parte for a Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued. (Attached hereto as Exhibit "A" is a true and correct copy of the ex parte notices sent to the above parties via Email).

4. On Thursday, October 24, 2019, at 11:35 a.m. I called Ms. Aviles at her office phone number listed above to attempt to ascertain whether Ms. Aviles was planning to appear in Court to oppose the Ex Parte application. I got Ms. Aviles voicemail. I left Ms. Aviles a message reiterating that we had sent notice to her office earlier in the day and asked her to contact me to let me know if she was going to appear in Court to oppose the application. I left my name, my client's name and my phone number in the message.

5. As of the filing of the City's Ex Parte Application, none of the parties responded that they would appear Thursday, October 24, 2019, at 1:30 p.m. at the Civil Clerk's Office, to receive the assignment of the City's case number, courtroom and hearing time for the City's Ex Parte Application.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of October 2019 at Fullerton, California.



Kimberly Hall Barlow

EXHIBIT A

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JONES & MAYER

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Krista MacNevin Jee**
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Bruce A. Lindsay
Gregory P. Palmer
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October 24, 2019

VIA EMAIL

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Re: *City of Fullerton v. Friends for Fullerton's Future, et al.*
Orange County Superior Court Case No. _____ (to be assigned)

Dear Ms. Aviles:

Please take notice that Plaintiff City of Fullerton (the City) will be appearing **today, October 24, 2019, at 1:30 p.m.** at the Civil Clerk's Office of the Orange County Superior Court, located at Central Justice Center, 700 Civic Center Drive West, Santa Ana, California, to be assigned a case number, courtroom and hearing time for its Ex Parte Application for a Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued.

Pursuant to the procedure set forth in the Orange County Superior Court's directive for filing an ex parte application with the initial filing of the Complaint, set forth on the court's website, the City will be e-filing and serving its Complaint and Ex Parte Application no later

than 12:00 p.m. today, and will appear at 1:30 p.m. today at the Civil Clerk's Office for its assignment of the case number, courtroom and time for hearing the Ex Parte Application. (See https://www.occourts.org/directory/civil/how-do-i/schedule-ex-parte-hearing.html. A screenshot of the procedures found at this link is enclosed herein). Please be guided accordingly.

Specifically, the City will seek the following ex parte relief:

(1) A Temporary Restraining Order asking the Court to temporarily enjoin Defendants Friends for Fullerton's Future, Joshua Ferguson, David Curlee and Christopher Tennyson, and those acting in concert with them, from (a) deleting certain City documents at issue (i.e., to preserve such documents); (b) further accessing or attempting to access private City computer networks, File Sharing accounts (and folders contained within them), and servers, without the City's authorization; (c) downloading any information or data from private City computer networks, File Sharing accounts (and folders contained within them), and servers, without the City's authorization; (d) engaging in any activity that disrupts, interferes or impairs the performance or functionality of private City computer networks, File Sharing accounts (and folders contained within them), and servers; and (e) publishing further information or documents obtained from the City's Dropbox folders and files listed at Exhibit B, without the City's permission; and

(2) For the Court to appoint a third party forensic expert to examine the computers, servers, and storage media (e.g., hard drives, flash drives, thumb drives, CD-ROMs, DVD-ROMs, etc.) within Defendants' possession, custody or control, or within the possession, custody or control of any members, employees, writers, volunteers, agents, and any persons acting on their behalf or in concert with them, for all copies of the PST files listed at Exhibit A, for segregation and to be held in the Court's custody until final resolution of this matter.

(3) The issuance of an Order to Show Cause Why a Preliminary Injunction Should Not Be Issued and setting the date for the hearing thereof.

See Exhibit A for a listing of the documents at issue that are to be preserved during the pendency of the litigation.

Pursuant to California Rule of Court 3.1204(a), please advise this office if you plan to appear at the Civil Clerk's Office of the Orange County Superior Court at 1:30 p.m. today and at the hearing on the City's Ex Parte Application.

Sincerely,

Kimberly Hall Barlow

KHB:sks
cc: Gary S. Kranker, Esq.
Bruce A. Lindsay, Esq.
Monica Choi Arredondo, Esq.

EXHIBIT A

Dropbox Folders and Files at Issue and to Be Segregated and Preserved

"(Addendum No. 1 Plans).zip" "1_Laguna Lake Files" "129 W Commonwealth – Graphics" "1310 Sorrento Pl" "52588 BID" "56019 Fiber" "ACUSA_H21 Leases" "ACUSA_PRR.zip" "Airport Database/Fullerton Municipal Airport.mdb" "AxonPRR.zip" "CE_PRR_KC.zip" "Citywide Bicycle \u0026 Ped. Improvement Project" "COF_CADD_PACKAGE-REV-2015-08" "council_20180430.zip" "Drainage Master Plan/1996 Boyle/COF_ comprehensive master plan of drainage_1996.pdf" "Dukes" "FD_20180430.zip" "Hillcrest Park" "JF_PRR_2.zip" "JF_PRR20181012.zip" "JF_PRR_PD.zip" "KCCPRR - Redacted.zip" "Keith Cangiarella PRR Responsive E-mails.zip" "Kevin/COF_Kevin.docx" "Lease Files.zip" "Lucity" "NARCOTICS"	"Police" "PRR 18-225 Replogle Responsive E-mails.pdf" "PPR_18_326_Curlee.zip" "PR19-171VD_1_2.zip" "pr1919 - Josh Ferguson.zip" "PRR_1600_2.7z" "PRR_19-134_data@thehourlystruggle.com.zip" "PRR Accela 8-17-17" "PRR_AIR20180604.zip" "PRR_CE.zip" "PPR_Cox.zip" "PRR_JF_20181002.zip" "PRRS01082019" "PRRS01082019.zip" "PRRS01092019.zip" "PRRS01092019_all.zip" "PRRS01152019_JF.zip" "Public Records Request" "Vernoica Duarte PRR" [sic] "Veronica Duarte - Air Combat" "Veronica Duarte.zip" "VM.zip" "Water" and ***Any other Folders or Files downloaded from the City's Dropbox account containing PST files.**

DIVISIONS

- Civil
- Collaborative Courts
- Collections
- Court Reporter Interpreter Services
- Criminal
- Family Court Services
- Family
- Grand Jury
- Jury Services
- Juvenile
- Probate/Mental Health
- Small Claims
- Traffic & Infractions

HOW DO I SCHEDULE AN EX PARTE HEARING WITH FILING OF COMPLAINT?

UNLIMITED CIVIL

Giving Notice

The moving party gives notice to the opposing party to appear in the Civil Clerk's Office, Central Justice Center, 700 Civic Center Drive West, Santa Ana at 1:30 p.m. and to check with the clerk for the assigned courtroom.

Filing

The complaint and ex parte application must be eFiled and fees paid no later than 1:15 pm (same day).

Appearance

All parties should report to the Civil Clerk's Office, Central Justice Center, 700 Civic Center Drive West, Santa Ana and check with the clerk to determine where the ex parte is to be heard.

LIMITED CIVIL

Giving Notice

The moving party gives notice to the opposing party to appear. For days, times, departments, and other filing requirements, go to Limited Civil Calendar Schedule & Requirements.

Filing

The complaint and ex parte application must be eFiled and fees paid prior to the ex parte hearing.

© 2019 Superior Court of Orange County

Exhibit H

Electronically Received by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 13

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No.

[PROPOSED] ORDER GRANTING PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; and Declaration of Kimberly Hall Barlow

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

[PROPOSED] ORDER

Plaintiff City of Fullerton's ("the City") Ex Parte Application for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued came on regularly for hearing on October 24, 2019, at 1:30 p.m. in Department ____ of this Court, before the Honorable _____.

Having considered all papers submitted in support of and in opposition to the City's Ex Parte Application, the admissible evidence submitted by the parties in connection with the City's Ex Parte Application, and the arguments made by counsel, and good cause having been shown,

IT IS HEREBY ORDERED THAT the City's Ex Parte Application is hereby **GRANTED** as follows:

(1) Defendants and their officers, agents, servants, employees, assigns, and all those acting in active concert or participation with them are hereby temporarily restrained from doing any of the following:

(a) Deleting, altering, destroying or removing any of the privileged and confidential City Dropbox folders and files listed at Exhibit A, or the documents contained therein, saved in any computers, servers, and storage media (e.g., hard drives, flash drives, thumb drives, CD-ROMs, DVD-ROMs, etc.), or existing in hard copy form, under the possession, custody or control of the Defendants and/or any third parties who may have acted in concert with the Defendants or with whom the Defendants may have shared such documents and data. Such documents and data shall be preserved until such time as they may be examined as part of the litigation and the Court determines whether they should be permanently destroyed under Court-appointed supervision. Defendants and all third parties who may have acted in concert with them are under a mandatory preservation order prohibiting them from destroying the records at issue in this litigation, as listed in Exhibit A, pending hearing on the City's Order to Show Cause;

(b) Deleting, altering, destroying or removing any written communications or memorialization of communications concerning the documents and data described at Paragraph (1)(a) above.

(c) Deleting, altering, destroying or removing any summaries of the documents and data described at Paragraph (1)(a) above;

(d) Further accessing or attempting to access the City's private computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(e) Conspiring with any third parties to access or attempt to access the City's private computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(f) Removing, copying, extracting or downloading any information or data from the City's computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(g) Conspiring with any third parties to remove, copy, extract or download any information or data from the City's computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(h) Engaging in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of the City's computer networks, the City's File Sharing accounts, and/or City servers; and

(i) Conspiring with any third parties to engage in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of the City's computer networks, the City's File Sharing accounts, and/or City servers;

(j) Selling, publishing, distributing, disclosing or otherwise using any of the information or documents obtained from the City Dropbox folders and files listed at Exhibit A, without the City's permission, or a valid court order; and

(k) Conspiring with third parties to sell, publish, distribute, disclose or otherwise use any of the information or documents obtained from the City Dropbox folders and files listed at Exhibit A, without the City's permission, or a valid court order;

(2) The Court will appoint a third party forensic expert to examine the computers, servers, and storage media (e.g., hard drives, flash drives, thumb drives, CD-ROMs, DVD-ROMs,

etc.) within Defendants' possession, custody or control, or within the possession, custody or control of any members, employees, writers, volunteers, agents, and any persons acting on their behalf or in concert with them, for all copies of the PST files listed at Exhibit A, for segregation and to be held in the Court's custody until final resolution of this matter. Each side will be permitted to make up to three (3) recommendations for a court-appointed third party forensic expert, to be submitted on or before _____, 2019; and

(3) An Order to Show Cause Why a Preliminary Injunction Should Not Be Issued is set for _____, 2019, at _____. Defendants shall appear at such time, to show cause why the preliminary injunctive relief sought in the City's Ex Parte Application for Temporary Restraining Order should not be granted. The briefing schedule shall be as follows:

(a) Plaintiff shall file any supplemental brief in support of its motion for preliminary injunction by _____, at _____ p.m.;

(b) Defendants shall file their opposition by _____, at _____ p.m.;

(c) Plaintiffs shall file their reply by _____, at _____ p.m.

This Order does not apply to the lawful access to the City's public website (https://www.cityoffullerton.com) or any of the public social media accounts of the City or any of its Departments or to documents intentionally produced in response to a Public Records Act request.

IT IS SO ORDERED.

Dated: _____, 2019

_____
JUDGE OF THE SUPERIOR COURT

EXHIBIT A

Dropbox Folders and Files at Issue

"(Addendum No. 1 Plans).zip"	"Lucity"
"1_Laguna Lake Files"	"NARCOTICS"
"129 W Commonwealth – Graphics"	"Police"
"1310 Sorrento Pl"	"PRR 18-225 Replogle Responsive E-mails.pdf"
"52588 BID"	"PPR_18_326_Curlee.zip"
"56019 Fiber"	"PR19-171VD_1_2.zip"
"ACUSA_H21 Leases"	"pr1919 - Josh Ferguson.zip"
"ACUSA_PRR.zip"	"PRR_1600_2.7z"
"Airport Database/Fullerton Municipal Airport.mdb"	"PRR_19-134_data@thehourlystruggle.com.zip"
"AxonPRR.zip"	"PRR Accela 8-17-17"
"CE_PRR_KC.zip"	"PRR_AIR20180604.zip"
"Citywide Bicycle \u0026 Ped. Improvement Project"	"PRR_CE.zip"
"COF_CADD_PACKAGE-REV-2015-08"	"PPR_Cox.zip"
"council_20180430.zip"	"PRR_JF_20181002.zip"
"Drainage Master Plan/1996 Boyle/COF_ comprehensive master plan of drainage_1996.pdf"	"PRRS01082019"
	"PRRS01082019.zip"
"Dukes"	"PRRS01092019.zip"
"FD_20180430.zip"	"PRRS01092019_all.zip"
"Hillcrest Park"	"PRRS01152019_JF.zip"
"JF_PRR_2.zip"	"Public Records Request"
"JF_PRR20181012.zip"	"Vernoica Duarte PRR" [sic]
"JF_PRR_PD.zip"	"Veronica Duarte - Air Combat"
"KCCPRR - Redacted.zip"	"Veronica Duarte.zip"
"Keith Cangiarella PRR Responsive E-mails.zip"	"VM.zip"
"Kevin/COF_Kevin.docx"	"Water"
"Lease Files.zip"	

Exhibit I

Electronically Filed by Superior Court of California, County of Orange, 10/24/2019 12:27:31 PM.
DAVID H. YAMASAKI, Clerk of the Court By Robert Renison, Deputy Clerk. 30-2019-01107063-CU-NP-CJC ROA # 10

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Attorneys for Defendant
CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON,

Plaintiff,

vs.

FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2019-01107063-CU-NP-CJC

Judge Thomas A. Delaney

REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; Declaration of Kimberly Hall Barlow; and [Proposed] Order]

Date: October 24, 2019
Time: 1:30 p.m.
Dept.: Orange County Superior Court
Civil Clerk's Office
CENTRAL JUSTICE CENTER
700 Civic Center Drive West
Santa Ana, CA 92701

TO THE HONORABLE COURT, DEFENDANTS AND THEIR COUNSEL OF RECORD:

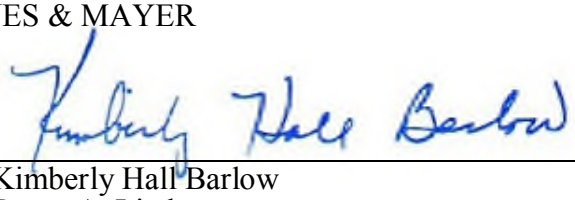
Pursuant to California Evidence Code sections 452(d) and 453, Plaintiff hereby respectfully request that this Court take judicial notice of the following document in support of its Ex Parte Application for a Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued.

- Petition for Writ of Mandate, Injunctive Relief for Violations of the California Public Records Act with Exhibits A through M, filed in *Joshua Ferguson v. City of Fullerton*, Orange County Superior Court Case No. 30-2019-01103679-CU-WM –CJC.

Under section 452(d) of the California Evidence Code, courts may take judicial notice of any of "[r]ecords of (1) any court of this state or (2) any court of record of the United States or of any state of the United States," Cal. Evid. Code § 452(d). As such, the City respectfully requests that the Court take judicial notice of the Petition for Writ of Mandate under Evidence Code referenced above, pursuant to sections and Evidence Code sections 452(d) and 453.

Dated: October 24, 2019

JONES & MAYER

By: 

Kimberly Hall Barlow
Bruce A. Lindsay
Monica Choi Arredondo
Attorneys for Defendant
CITY OF FULLERTON

Exhibit J

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kaviles@opengovlaw.com

Attorneys for Defendants
FRIENDS FOR FULLERTON'S FUTURE,
JOSHUA FERGUSON, and DAVID CURLEE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CITY OF FULLERTON, Plaintiff, v. FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, and CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive, Defendants,	Case No.: 30-2019-01107063-CU-NP-CJC *Assigned to the Hon. Thomas A. Delaney* **OPPOSITION TO PLAINTIFF'S *EX PARTE* APPLICATION FOR AN UNCONSTITUTIONAL PRIOR RESTRAINT** Date: October 24, 2019 Time: 1:30 p.m. Dept.: C24

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OPPOSITION TO MOTION FOR UNCONSTITUTIONAL PRIOR RESTRAINT

I. INTRODUCTION

Defendant Friends for Fullerton's Future, is a website/blog dedicated to covering news, politics, and government affairs in the City of Fullerton ("City"). Two weeks ago, Joshua Ferguson, a frequent contributor to the blog, filed a lawsuit against the City for its repeated obstruction of the disclosure of public records, including numerous records related to police and employee misconduct. (Orange County Superior Court, Case No. 30-2019-01103679-CU-WM-CJC.) Yesterday, in an attempt to silence the blog and in retaliation for Mr. Ferguson's recent lawsuit, the City sued the blog, Mr. Ferguson, and David Curlee, who has also posted on the blog in the past.[1]

The City also noticed this *ex parte* application without complying with the notice requirements in California Rule of Court 3.1203, which provides that "[a] party seeking an *ex parte* order must notify all parties no later than 10:00 a.m. the court day before the *ex parte* appearance, absent a showing of exceptional circumstances that justify a shorter time for notice." The City has not complied with this notice requirement and has made no showing of any exceptional circumstances, nor could this showing be made since the City has been in possession of the information that it claims justifies this *ex parte* application for over four months. (Complaint, Exs. A-B.) The City's claims that it needed to wait to secure its network does not suffice – the City's allegations relate to access of its Dropbox, not its network. Moreover, the Lee declaration states that it advised the City wait until the network was secure to file this lawsuit, which it estimated was 30 days. The declaration notably does not state when it was retained or when it so advised, but given that the City has known about the basic issue underlying this lawsuit since **at least** June, or over 120 days, this argument does not hold water.

The lawsuit seeks to restrain the publication from using documents the City claims were disclosed without authorization, and obtain an order to "remove the inappropriately

[1] The City also sued one Christopher Tennyson, someone not connected with the blog in any way. The only allegation made against him is for the crime of working in the same camera store as Mr. Ferguson.

published…City documents from their Blog," and ultimately require the blog to destroy any records it may have that the City deems it is not "authorized" to possess. (See Proposed Order, p. 2, at (1)(k); Complaint, p. 10, at 27; p. 19, at 2.(d), (e), (f).). This request is an unconstitutional prior restraint. (See *Alexander v. United States* (1993) 509 U.S. 544, 550 [an order prohibiting the press from publishing a news article is a "classic example[s] of prior restraint"].)

Prior restraints violate both the California and United States Constitutions and have been struck down by our courts time and time again. (*Association for Los Angeles Deputy Sheriffs v. Los Angeles Times Communications LLC* (2015) 239 Cal.App.4th 808, 824 ("*ALADS*") ["[f]or more than 100 years, federal and state courts have refused to allow the subjects of potential news reports to stop journalists from publishing reports about them"]; *see also In re Providence Journal Co.* (1st Cir. 1986) 820 F.2d 1342, 1348–1349 [noting that in its nearly two centuries of existence, the Supreme Court has never upheld a prior restraint on the publication of news].) "In the First Amendment the Founding Fathers gave the free press the protection it must have to fulfill its essential role in our democracy. The press was to serve the governed, not the governors." (*New York Times Co. v. United States* (1971) 403 U.S. 713, 717 ("*New York Times*").)

As the Supreme Court repeatedly has made clear, courts may not enjoin or punish the publication of public records, even when those records reveal allegedly confidential information. (*See, e.g.*, *Florida Star v. B.J.F.* (1989) 491 U.S. 524, 537 [reversing judgment against newspaper that published name of rape victim inadvertently disclosed in police report]; *ALADS*, 813, 821-823 [similar demand to return confidential records was an unconstitutional prior restraint subject to anti-SLAPP motion]; *FMC Corp. v. Capital Cities/ABC.* (7th Cir. 1990) 915 F.2d 300, 301 [applying California law, Seventh Circuit rejected demand that ABC news return all copies of documents that plaintiff alleged were "stolen" from it; court held that ABC was "free to retain copies of any of…documents in its possession (and to disseminate any information contained in them) in the name of the First Amendment"].)

Here, any order that operates to punish or prevent the publication or dissemination of information that the Blog has lawfully obtained is a prior restraint that is presumptively unconstitutional. The City has made no showing - nor could it - satisfying the strict constitutional burdens for orders like the one the City seeks here, that effectively operate as prior restraints on speech. The City's interest in preserving allegedly confidential information and information it claims violates the privacy of third parties does not come close to justifying the extraordinary remedy of a prior restraint. (*See Hurvitz v. Hoefflin* (2000) 84 Cal.App.4th 1232, 1243 [prior restraint on speech cannot be justified by allegations of a "threatened violation of the physician-patient privilege, *or any other privilege*" (emphasis added)].)

The City's request that this Court appoint a "third-party forensic expert to examine the computers, servers, and storage media within Defendant's possession, custody or control, or within the possession, custody or control of any members, employees, writers, volunteers, agents, and any persons action in concert with them…" is just as problematic. (Proposed Order, p. 2-3.) This overbroad request is prohibited by the Shield Law, which protects journalists from disclosing unpublished information or sources of information obtained in the course of gathering and reporting on the news. (*Delaney v. Superior Court* (1990) 50 Cal.3d 785, 796-97.) The federal Reporter's Privilege provides independent protection from the City's overreach. The California Supreme Court has recognized that this First Amendment-based protection applies in state court, as a complement to the state's Shield Law. (*See New York Times Co. v. Superior Court* (1990) 51 Cal.3d 453, 469 (Mosk, J., concurring and dissenting); *Mitchell v. Superior Court* (1984) 37 Cal.3d 268, 277-79.) Under the qualified federal privilege, a party cannot compel a journalist to provide testimonial information or produce notes and related materials unless the party first demonstrates that the information sought "goes to the heart" of the case, is "non-cumulative," and the party "has exhausted all alternative sources of obtaining the needed information." (*Mitchell*, 37 Cal.3d at 280, 282; *Shoen v. Shoen* (9th Cir. 1995) 48 F.3d 412, 416 ("*Shoen II*").) The Ninth Circuit has emphasized that the federal constitutional standard must be rigorous to "ensure that compelled disclosure is the

exception, not the rule. ... Indeed, if the privilege does not prevail in all but the most exceptional cases, its value will be substantially diminished." (*Shoen II*, 48 F.3d at 416.).

If the Constitutional issues underlying the City's *ex parte* application were not enough, the City's lawsuit is also a Strategic Lawsuit Against Public Participation - a SLAPP. The claims arise from a multitude of protected activity – the filing of a public records request (a constitutional right that underlies our democratic system of governance), newsgathering, reporting on issues of great public concern, and filing a petition to compel the disclosure of records. Had the Defendants been provided with proper notice of this *ex parte*, a Special Motion to Strike under Code of Civil Procedure, section 425.16, (anti-SLAPP motion) would have already been filed, setting forth the wealth of authorities that support Defendants' position – precisely why the City attempted to avoid proper notice.

While the City has previously articulated the position that the Blog is not a news organization and warrants no protections, this is incorrect. (*See O'Grady v. Sup.Ct. (Apple Computer, Inc.)* (2006) 139 Cal.App.4th 1423, 1457 [noting that it could think of no workable test or principle that would distinguish 'legitimate' from 'illegitimate' news" and "decline[d] the implicit invitation to embroil ourselves in questions of what constitutes "legitimate journalism"]; *People v. Von Villas* (1992) 10 Cal.App.4th 201, 231-32 [applying shield law protections to freelance writer].)

Finally, the arguments are factually unsupported. The City's declarations are objectionable[2] - filled with logical fallacies, unwarranted and unsupported conclusions, and baseless allegations that cannot be properly addressed on an *ex parte* basis, especially one without proper notice. Essentially, the City argues that it has determined that the Defendants are criminals because they accessed a Dropbox link sent by the City to Mr. Ferguson with his name on it. (*Ex Parte* App., p. 3.) The declarations make numerous

[2] Defendants intend to file objections to the City's declarations for a variety of reasons, but have not yet had the opportunity to do so given the length of the declarations and the City's lack of notice.

allegations that someone using a VPN or a TOR (both ways in which to make one's self unidentifiable online[3]) accessed files through the City's Dropbox account that the City did not intend to be public. Despite the fact that the declarations explain that a person using a VPN or TOR cannot be identified, they make the outrageous leap that it was Joshua Ferguson or "his accomplices." The City has merely complied a bunch of technical information into its declarations, hoping that this Court will not understand that there is no actual evidence that the people it has named in this lawsuit have anything to do with accessing the files it claims were confidential, even though they were apparently maintained in such a careless manner that completely undermines the claim that the information is confidential. The City provides no factual support for its requested relief. For example, the documents that the City claims are confidential and that were posted on the Blog could have been leaked by any number of people. No can the City demonstrate what files the Blog has, if any, in its possession, undermining any threat of publication in the future and the need for any restraining order, much less one issued on an emergency basis.

Given the City's questionable "evidence," untenable legal theories, and the immense weight of the rights at issue, Defendants respectfully request that this Court deny the City's *ex parte* application in its entirety and postpone any further action on this case until after Defendants' Anti-SLAPP motion can be heard.

II. ARGUMENT

A. The City Seeks An Unconstitutional Prior Restraint.

As the United States Supreme Court repeatedly has recognized, prior restraints constitute "the most serious and the least tolerable infringement on First Amendment rights." (*Nebraska Press Ass'n v. Stuart* (1976) 427 U.S. 539, 559.) At its core, the prior-restraint doctrine expresses a constitutional aversion to government censorship of the

[3] See https://www.pcmag.com/roundup/296955/the-best-vpn-services for an article describing the importance of internet security and why people need VPNs. Spoiler alert: it's not because they are hackers.

press. The Supreme Court has explained that prior restraints against speech must be held to a stricter standard than even post-publication criminal penalties because:

> a free society prefers to punish the few who abuse rights of speech after they break the law than to throttle them and all others beforehand. It is always difficult to know in advance what an individual will say, and the line between legitimate and illegitimate speech is often so finely drawn that the risks of freewheeling censorship are formidable.

(Southeastern Promotions v. Conrad (1975) 420 U.S. 546, 559.)

When the government, including the judiciary, censors the press, it harms the "main purpose" of the First Amendment, which is "to prevent all such previous restraints upon publications as [have] been practiced by other governments." (*Nebraska Press,* 427 U.S. at 557.) It is widely agreed that "[t]here is, indeed, something peculiarly totalitarian about government systems of prior restraint." (R. Smolla, Smolla & Nimmer on Freedom of Speech § 15:10 (2004).) The Supreme Court has "learned...from what we view as the unhappy experiences of other nations where government has been allowed to meddle in the internal editorial affairs of newspapers." (*Nebraska Press,* 427 U.S. at 560.) This core principle is critical here; "the history and language of the First Amendment support the view that the press must be left free to publish news, whatever the source, without censorship, injunctions, or prior restraints." (*New York Times,* 403 U.S. at 717 (Black, J., concurring).)

Because prior restraints are so antithetical to the First Amendment, they are "presumptively unconstitutional." (*Id.* (emphasis added).) The Court has declared that prior restraints may be justified, if at all, only in the most exceptional circumstances, such as to limit dissemination of information about troop movements in wartime, *Near v. Minnesota* (1931) 283 U.S. 697, 716, or to "suppress[ ] information that would set in motion a nuclear holocaust." (*New York Times,* 403 U.S. at 726 (Brennan, J., concurring).) Similarly, in granting an emergency stay of a prior restraint against a news organization, Justice Blackmun declared that such orders are a "most extraordinary remedy" that may be used "only where the evil that would result from the reportage is both great and certain and cannot be militated by less intrusive measures." (*CBS v. Davis* (1994) 510 U.S. 1315, 1317 (1994) (Blackmun, J., in chambers).) Absent a "clear and

present danger," (*Nebraska Press*, 427 U.S. at 563) to a "state interest of the highest order," (*Smith v. Daily Mail Publishing Co.* (1979) 443 U.S. 97, 102), such restraints cannot be upheld.

To date, those circumstances have remained purely hypothetical[4]; the Court without exception has invalidated prior restraints, even where substantial interests would be impaired by the publication sought to be enjoined. (*See, e.g.*, *Near*, 283 U.S. at 716-718 [invalidating prior restraint against defamatory and racist publication that allegedly disturbed the "public peace"]; *Nebraska Press*, 427 U.S. at 556-561 [invalidating prior restraint against publication of information about criminal defendant's confession, despite alleged risk to Sixth Amendment rights]; *New York Times*, 403 U.S. at 714 [invalidating prior restraint against publication of the "Pentagon Papers," despite the government's argument that disclosure of that information posed a "grave and immediate danger" to national security.] In fact, the Court "has never upheld a prior restraint, even faced with the competing interest of national security or the Sixth Amendment right to a fair trial." *Procter & Gamble Co. v. Bankers Trust Co.* (6th Cir. 1996) 78 F.3d 219, 227; *accord South Coast Newspapers, Inc. v. Superior Court* (2000) 85 Cal. App. 4th 866, 870 [court observed that it was "unaware of any case, in either federal or state court, that has upheld a prior restraint under the *Nebraska Press* criteria"].)

California's state constitutional guarantee of free speech and free press "is more definitive and inclusive than the First Amendment"; as a consequence, the burden on a party seeking a prior restraint in this state is even more onerous and may be insurmountable. (*In re Marriage of Candiotti* (1995) 34 Cal. App. 4th 718, 724.) More than a century ago, the California Supreme Court explained the breadth of the state's protection of speech and press rights:

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[4] Courts have yet to identify an interest that would satisfy the "state interest of the highest order" standard. As one commentator has explained, "*Florida Star* itself raised the presumptive level [of this standard] beyond realistic reach." (J. Mintz, The Remains of Privacy's Disclosure Tort, 55 Md. L. Rev. 425, 455 (1996).)

> The wording of [Article I, section 2(a)] is terse and vigorous, and its meaning so plain that construction is not needed. The right of the citizen to freely ... publish his sentiments is unlimited[.] ... He shall have no censor over him...,but he shall be held accountable to the law for...what he publishes.

(Dailey v. Superior Court (1896) 112 Cal.94, 97.)

Not surprisingly, California courts have also uniformly struck down prior restrains, which the California Supreme Court has denounced as "the most severe method of intellectual suppression known in modem times." (*Flack v. Municipal Court* (1967) 66 Cal.2d 981, 988 n.5. *See, e.g., KCST-TV Channel 39 v. Municipal Court* (1988) 201 Cal.App.3d 143, 144-145 [refusing to restrain publication of information that was lawfully obtained, noting that "long-standing Supreme Court precedent establishes the court's prohibitory order is an unconstitutional prior restraint violating the First Amendment"]; *KGTV Channel 10 v. Superior Court* (1994) 26 Cal.App.4th 1673, 1677 [striking down order barring press from publishing photographs of criminal defendants as an unconstitutional prior restraint]; *Freedom Communications v. Superior Court* (2008) 167 Cal.App.4th 150, 251 [finding that order preventing a news organization from publishing lawfully obtained information was "unconstitutional under both the United States and California Constitutions," and, consequently, "must immediately fall"].)

Most recently, in a nearly identical situation, the court of appeal granted an anti-SLAPP motion after a union tried to clawback and stop the publication documents about police officers, which the union claimed were confidential and could not be released under various protective statutes. (*ALADS,* 239 Cal.App.4th at 920.) The court summed up its decision affirming the trial court's grating of the anti-SLAPP motion:

> [The union] has cited no case permitting the kind of injunction it seeks here, to restrain a newspaper from publishing news articles on a matter of public concern....because there is no such case. For more than 100 years, federal and state courts have refused to allow the subjects of potential news reports to stop journalists from publishing reports about them. (*Providence Journal, supra*, 820 F.2d at pp. 1348–1349 ["In its nearly two centuries of existence, the Supreme Court has never upheld a prior restraint on pure speech"; the Supreme Court has never upheld a prior restraint on the publication of news.])

(Id., at 824.) The request by the City in this case is no different. It is a prior restraint that the is presumptively unconstitutional and must be rejected.

B. <u>Prior Restraints Are Presumptively Unconstitutional</u>.

As the cases cited in the preceding section shows, a request for a prior restraint comes "with a heavy presumption against its constitutional validity." (*Organization for a Better Austin v. Keefe* (1971) 402 U.S. 415, 419; *see also Freedom Communications,* 167 Cal. App. 4th at 154 [holding prior restraint is a "most extraordinary remedy that may be used only in exceptional cases"].) A court may not issue even a temporary prior restraint unless the restriction is necessary "to further a state interest of the highest order," (*Smith*, 443 U.S. at 102), and the publication "threaten[s] an interest more fundamental than the First Amendment itself." (*Procter & Gamble,* 78 F.3d at 227.)

This is an extremely strict standard. The court must find evidence of a "clear and present danger" of harm to a paramount state interest; "speculati[on]" or "factors unknown and unknowable" never will justify a prior restraint. (*Nebraska Press,* 427 U.S. at 563.) Thus, for example, "[i]t is not enough for a court to decide that the fair trial may be affected by the exercise of free speech." (*Hurvitz*, 84 Cal. App. 4th at 1241.) Instead, the proponent of the restraint bears "the burden of producing evidence to establish the prejudice." (*Ibid.*) The City did not come close to meeting this standard, nor could it.

C. <u>A Prior Restraint Is Not Justified Even Where Information Is Confidential Or Obtained Illegally By A Third Party And Disclosed To The Press</u>.

There is a long line of cases from the Supreme Court which have held that the constitutional presumption against prior restraints applies regardless of whether the information is confidential or obtained illegally. In the landmark *New York Times* case, the Supreme Court rejected a prior restraint to prevent the newspaper's publication of the Pentagon Papers, even though the Court acknowledged that it was a "classified study" the disclosure of which was not authorized. 403 U.S. at 714. (*See also Cox Broadcasting Corp. v. Cohn* (1975) 420 U.S. 469 [1st Amend. protected reporter who published rape victim's name in violation of state criminal statute]; *Oklahoma Publishing Co. v. District Court* (1977) 430 U.S. 308 [reversing injunction which prevented the reporting of the name or likeness of a juvenile criminal defendant, in spite of a state law that required juvenile proceedings to be held in private]; *Landmark Communications v. Va.* (1978) 435 U.S.

829, at 831-32 [invalidating newspaper's punishment for publishing information from confidential judicial disciplinary proceedings]; *Smith v. Daily Mail Publishing,* 443 U.S. 97 [invalidating state law that criminalized publication of juvenile murder suspect's name without court permission]; *Florida Star,* 491 U.S. 524 [1st Amend. protected newspaper that published rape victim's, which violated state criminal statute]; *Bartnicki v. Vopper* (2001) 532 U.S. 514, 517, 535 [1st Amendment protected journalists who reported contents of illegally intercepted telephone conversations even though they knew "or at least had reason to know" the interceptions were unlawful because bargaining negotiations between school board and union were matters of public concern].)

Relying on this unbroken line of United States Supreme Court authorities and the broader state constitutional guarantee of free speech,[5] California courts have also held that the constitutional presumption against prior restraints applies regardless of whether the information is confidential or obtained illegally. In *Nicholson v. McClatchy Newspapers* (1986) 177 Cal.App.3d 509, 521, the plaintiff alleged that the newspapers' reporting of the fact that the State Bar had found him unqualified for appointment to the bench, which was required to be kept confidential under the Government Code, violated his right of privacy. (*Ibid.*) In ruling for the newspapers, the court of appeal recognized both the plaintiff's expectation of confidentiality and that someone undoubtedly "acted in violation of this law in disclosing the evaluation to the media defendants." (*Id.* at 516.) But, the court said, "the First Amendment protects the ordinary news-gathering techniques of reporters and those techniques cannot be stripped of their constitutional shield by calling them tortious." (*Id.* at 513.) The court stated that ordinary news-gathering techniques "of course, include asking persons questions, including those with confidential or restricted information." (*Id.* at 519.) "While the government may desire to keep some proceedings confidential and may impose the duty upon participants to maintain confidentiality, it may

[5] *See, e.g., Gilbert v. National Enquirer, Inc.* (1996) 43 Cal. App. 4th 1135, 1144, "the California Constitution provides an even broader guarantee of the right of free speech and the press than does the First Amendment."]

not impose criminal or civil liability upon the press for obtaining and publishing newsworthy information through routine reporting techniques." (*Id.* at 519–520.)

Most recently, in *ALADS,* 239 Cal.App.4th at 826-827, the court of appeal upheld a trial court ruling which granted an anti-SLAPP motion in circumstances very similar to this case. The Los Angeles Times received information about the qualifications of police officers, including information about past instances of misconduct, records which arguably may be withheld from public disclosure pursuant to certain statutes. (*Ibid.*) With no evidence of wrongdoing, the union claimed that the Los Angeles Times had obtained the records "through criminal means." But the court found that the union "ha[d] not distinguished, and cannot distinguish, the 'wealth of both State and Federal case law, discussing the protection journalists and the press enjoy under the First Amendment where there have been allegations that published or disclosed content had been illegally obtained.'" (*Id.* at 819.)

In *Florida Star*, the Supreme Court explained that it is the responsibility of the government to deal with the fallout from its failure to protect confidential information:

> Where, as here, the government has failed to police itself in disseminating information, it is clear under *Cox Broadcasting*, *Oklahoma Publishing*, and *Landmark Communications* that the imposition of damages against the press for its subsequent publication can hardly be said to be a narrowly tailored means of safeguarding anonymity. Once the government has placed such information in the public domain, 'reliance must rest upon the judgment of those who decide what to publish or broadcast.

(*Id.* at 538 (citations omitted); *see also Ashcraft v. Conoco* (2000) 218 F.3d 288, 303 ["No citizen is responsible, upon pain of criminal and civil sanction, for ensuring that the internal procedures designed to protect the legitimate confidences of government are respected"].)

As Justice Stewart once explained, the "government cannot take it upon itself to decide what a newspaper may and may not publish," and that although "*government may deny access to information and punish its theft, government may not prohibit or punish the publication of that information once it falls into the hands of the press*, unless the

need for secrecy is manifestly overwhelming." (*Landmark Communications*, 435 U.S. at 849 (Stewart, J., concurring) (emphasis added).)

As these cases demonstrate, whether information is released by mistake, obtained in violation of criminal or civil statutes, or even stolen by a third party, courts have consistently held that both pre-publication restraints and post-publication sanctions violate the First Amendment, absent exceptional circumstances. Here, the Blog did nothing improper, much less illegal, to obtain the information at issue here and its publication of that information cannot be lawfully restrained.[6]

D. <u>Privilege, Privacy, Or Even Competing Constitutional Rights Are Insufficient To Justify The Extraordinary Remedy Of A Prior Restraint</u>.

The City argues the documents at issue contain privileges and confidential information in an attempt to justify its presumptively unconstitutional request. These justifications have all been previously rejected.

In a case where the trial court issued an order barring the disclosure of information protected by the patient/physician privilege, which the trial court found would have violated the patients' rights of "privacy and dignity," the court of appeal found that sparing citizens from embarrassment, shame, or even intrusions into their privacy has never been held to outweigh the guarantees of free speech in our federal and state Constitutions. *Hurvitz,* 84 Cal.App.4th at 1244. The court also noted that "[r]espondent can point to no case where any court in the nation has held that a threatened violation of the patient/physician privilege or any other privilege justifies a prior restraint of speech." *Id.* at 1243. The court recognized that while there are "statutes prohibiting health care providers from disclosing confidential health care information," "they cannot support a prior restraint on speech." *Ibid.*

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[6] Contrary to the City's argument, the Blog has no burden to demonstrate how it got access to any information it published. That information is protected by the Shield Law. Any inference that the invocation of one's Constitutional rights is akin to suggesting that there should be a negative inference from a criminal defendant's decision not to testify, which is clearly erroneous. Moreover, that burden of proof in this case and the burden to meet the high showing necessary for any TRO, sits squarely on the shoulders of the City.

The Supreme Court has also made clear that merely "[d]esignating the conduct as an invasion of privacy" does not warrant a prior restraint. (*Organization for a Better Austin*, 402 U.S. at 419-420 [rejecting claim that privacy interests justified restraint against distribution of leaflets].)

Courts have also denied requests for prior restraints even when competing constitutional rights are at stake. (*See, e.g.*, *United States v. McKenzie* (5th Cir. 1984) 735 F.2d 907, 910 [describing prior proceedings in which an order enjoining CBS from airing a segment of "60 Minutes" involving an ongoing criminal case was stayed as an unconstitutional prior restraint]; *United States v. Salameh* (2d Cir. 1993) 992 F.2d 445, 446 ["[a] prior restraint on constitutionally protected expression, even one that is intended to protect a defendant's Sixth Amendment right to trial before an impartial jury, normally carries a heavy presumption against its constitutional validity"]; *Menendez v. Fox Broadcasting* (C.D. Cal. April 19, 1994) 22 Med. L. Rep. 1702, 1703 [denying request to enjoin docudrama about highly-publicized murders while retrial of defendants was pending]; *Providence Journal,* 820 F.2d 1342, 1345, modified on reh'g en banc, 820 F.2d 1354 (1st Cir. 1987), cert. dismissed on other grounds, *United States v. Providence Journal Co.* (1988) 485 U.S. 693 [reversing "temporary restraining order barring publication of [FBI] logs and memoranda" to protect surveilled citizen's Fourth Amendment rights...].)

Nebraska Press highlights the extraordinarily heavy constitutional presumption against prior restraints that prevent the press from disseminating information about criminal proceedings. In that case, the Supreme Court struck down a prior restraint that barred the media from publishing information about a defendant's alleged confession in a highly-publicized mass-murder case in rural Nebraska, rejecting the argument that the potential prejudice to the defendant's Sixth Amendment right to a fair trial trumped the press' First Amendment right to be free of government censorship. (427 U.S. at 556-561.) If the defendant's fair-trial rights did not justify a prior restraint in those circumstances – the imminent disclosure of highly inculpatory information about an emotionally-charged

crime in a county with a relatively small jury pool – then the presumption against such orders is virtually insurmountable.

E. <u>An Order Compelling Return Lawfully Acquired Documents Is Itself A Prior Restraint</u>.

The constitutional prohibition against prior restraints extends to requests for court orders to review or confiscate editorial materials, just as it does to direct orders forbidding publication. For example, in *FMC Corp.,* 915 F.2d 300, 301, the Seventh Circuit applied California law in addressing a claim that an ABC news report featured stolen documents. The court held that ABC was "free to retain copies of any of ... documents in its possession (and to disseminate any information contained in them) in the name of the First Amendment." (*Ibid.*; *see also Goldblum v. NBC* 584 (9th Cir. 1978) F.2d 904, 907 [vacating order requiring NBC to submit film for prebroadcast review because "[t]he order to produce the film in aid of a frivolous application for a prior restraint suffers the constitutional deficiencies of the application for an injunction"]; *Council of the City of New Orleans v. Washington* (La. App. 2009) 13 So.3d 662 [vacating judgment compelling return, and restraining publication, of privileged records that agency had released pursuant to a public records request, when records were widely disseminated over a ninety-day period].)

Here, too, the Blog is entitled to retain copies of the records it acquired in the course of its newsgathering.

F. <u>The City Provides No Evidence Supporting Its Unconstitutional Request</u>.

Yet another insurmountable hurdle to the City's request – the City can provide no admissible evidence of what the Blog or its reporters actually have in their possession. Instead, the City asks this Court to enjoin the Blog from publishing any records it *might* have in its possession. But the *mere possibility* that a party's interest *could* be impacted could never be sufficient to satisfy the strict constitutional requirements for a prior restraint. (*Nebraska Press*, 427 U.S. at 563.) It is not enough for a court to decide that some right *may* be affected by the exercise of free speech. (*Hurvitz*, 84 Cal.App.4th at

1241.) Because there is *no* evidence whatsoever of what information the Blog may or may not have, the City cannot show there is any threat.

G. **The Requested Relief Is Ineffective Since The Information Has Already Been Published.**

Prior restraints are particularly inappropriate where, as here, the information sought to be suppressed already has been made available to the public. Simply put, once "the cat is out of the bag," any request to restrain publication or to seal the information is "ineffective" in advancing the countervailing compelling interest in secrecy. As this Second District explained when it denied a request for a prior restraint in *Hurvitz*, 84 Cal. App. 4th at 1245, "neither the state nor the federal Constitution permits the court to lock the barn door after the horse is gone."

The Fourth Circuit's decision in *In re Charlotte Observer* (4th Cir. 1990) 921 F.2d 47 is instructive. There, the district court enjoined two reporters from publishing the name of the target of an ongoing grand jury investigation after it was inadvertently disclosed in open court in violation of confidentiality laws. Id. at 49-50. The appellate court vacated the injunction as an impermissible prior restraint, noting that "[o]nce announced to the world," "the cat [was] out of the bag" and "the information lost its secret characteristic, an aspect that could not be restored by the issuance of an injunction." (*Id.* at 50; *see also Bank Julius Baer & Co. Ltd. v. WikiLeaks* (N.D. Cal 2008) 535 F.Supp.2d 980, 985 [refusing to enjoin further publication of bank records and related documents that had been posted on defendant's website]; *In re Continental Illinois Securities Litig*. (7th Cir. 1984) 732 F.2d 1302, 1312-13 [references and scattered quotes made public were sufficient to support public access; it did not matter that entire report was not read aloud in court); *Kamakana v. City and County of Honolulu* (9th Cir. 2006) 447 F.3d 1172, 1184 [because "many names or references for which the United States sought redaction were either already publicly available or were available in other documents being produced" to the press, government could not meet its burden of showing the information could remain confidential].)

Whether the genie is out of the bottle, the cat is out of the bag, or the chicken has flown the coop, an injunction could no longer protect the interest that the City seeks to protect, even if it were worthy of such an extraordinary remedy. The publication of information that the City asks this Court to restrain has already occurred. Since no injunction can change that, the City's requested relief would be ineffective and should be denied.

H. <u>The City's Requested Restraining Order Violates the Shield Law.</u>

The City's request that this Court appoint a "third-party forensic expert to examine the computers, servers, and storage media within Defendant's possession, custody or control, or within the possession, custody or control of any members, employees, writers, volunteers, agents, and any persons action in concert with them…" violates the Shield Law and the First Amendment based Reporter's Privilege. (Proposed Order, p. 2-3.)

The Shield Law provides in pertinent part:

> (b) a publisher, editor, reporter, or other person connected with or employed upon a newspaper, magazine, or other periodical publication, or by a press association or wire service, or any person who has been so connected or employed, *shall not be adjudged in contempt by a judicial…body having the power to issue subpoenas* for refusing to disclose the source of any information procured while so connected or employed for publication in a newspaper *…or for refusing to disclose any unpublished information obtained or prepared in gathering, receiving or processing of information for communication to the public.*
>
> As used in this subdivision, "unpublished information" includes information not disseminated to the public by the person from whom disclosure is sought, whether or not related information has been disseminated and includes, but is not limited to, all notes, out takes, photographs, tapes or other data of whatever sort not itself disseminated to the public through a medium of communication whether or not published information based upon or related to such material has been disseminated.

(Cal. Const., Art. I, § 2, emphasis added; *see also* Evid. Code § 1070 [constitutional provision adopted in response to court rulings attempting to limit the scope of Evidence Code section 1070].)

The purpose of the Shield Law (Cal. Const., Art I, Sect. 2., Cal. Evidence Code 1070) is to keep newspersons from becoming agents of discovery, to maintain their neutrality and objectivity, and "to protect [their] ability to gather and report the news." (*Id.* at 806,

fn. 20.) This protection "reflects a strong interest in the Legislature and the people of this state to afford newspersons the highest possible level of protection from compelled disclosure of confidential sources and confidential information." (*Playboy Enterprises, Inc. v. Superior Court* (1984) 154 Cal.App.3d 14, 27.) "[N]othing in the shield law's language or history to suggest the immunity from contempt is qualified such that it can be overcome by a [civil litigant's] showing of need for unpublished information[.]" (*Miller v. Superior Court* (1999) 21 Cal.4th 883, 890.) Nor can a journalist lose his or her shield law immunity against being compelled to disclose how information came into the journalist's possession merely by reporting some of the information obtained. (*In re Jack Howard* (1955) 136 Cal.App.2d 816, 818-19.)

The shield law is, by its own terms, *absolute* rather than qualified in immunizing a newsperson from contempt for revealing [sic] unpublished information obtained in the news gathering process." (*Miller v. Superior Court* (1999) 21 Cal.4th 883, 890-91.) The immunity contained in California's Shield Law is absolute in a civil lawsuit. (*Id.* at 901.)

In addition to the constitutional and statutory protections offered by California's Shield Law, journalists have a qualified testimonial privilege that derives from the First Amendment to the United States Constitution. The Ninth Circuit has expressly recognized a qualified privilege, grounded in the First Amendment, permitting journalists to resist the disclosure of unpublished information obtained during the course of newsgathering activities:

> Rooted in the First Amendment, the privilege is a recognition that society's interest in protecting the integrity of the newsgathering process, and in ensuring the free flow of information to the public, is an interest of sufficient social importance to justify some incidental sacrifice of sources of facts needed in the administration of justice.

Shoen v. Shoen ("*Shoen I*") (9th Cir. 1993) 5 F.3d 1289, 1292 (internal quotations and citation omitted.) Likewise, the California Supreme Court expressly has recognized a qualified journalists' privilege arising from the First Amendment. (*See Mitchell*, 37 Cal. 3d at 274-84.)

In *Shoen I*, the Ninth Circuit Court of Appeals explained that it, along with eight other federal circuits, had established a "qualified privilege for journalists" under the First Amendment against compelled disclosure. (*Shoen I*, 5 F.3d at 1292 & n.5.) The court also held that this qualified federal privilege applies even to non-confidential information. (*Id.*) at 1295. In *Shoen II* (on appeal after remand), the Ninth Circuit set forth the stringent test that a party seeking disclosure must satisfy:

> where information sought is non-confidential, a civil litigant is entitled to requested discovery notwithstanding a valid assertion of the journalist's privilege by a nonparty only upon a showing that the requested material is (1) unavailable despite exhaustion of all reasonable alternative sources; (2) non-cumulative; ***and*** (3) clearly relevant to an important issue in this case.

(*Shoen II*, 48 F.3d at 416 (emphasis added).)

The City makes no attempt to even address these prongs.

I. <u>This Is A SLAPP Lawsuit</u>.

The City's egregious and meritless Complaint amounts to a retaliatory strategic lawsuit against public participation, and is prohibited by Code of Civil Procedure, section 425.6.

At the first prong, "the critical consideration is whether the cause of action is based on the defendant's protected free speech or petitioning activity." (*Navellier v. Sletten* (2002) 29 Cal.4th 82, 89.) A party meets this burden by demonstrating that the act underlying the claim fits one of the categories spelled out in section 425.16(e). (*Braun v. Chronicle Publ'g Co.* (1997) 52 Cal.App.4th 1036, 1043.)

Section 425.16(e) defines an "act in furtherance of a person's right of petition or free speech under the United States or California Constitution in connection with a public issue" to include:

> (1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law,
>
> (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law,

(3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or

(4) any other conduct in furtherance of the exercise of the constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.

At the first prong, "the critical consideration is whether the cause of action is based on the defendant's protected free speech or petitioning activity." (*Navellier,* 29 Cal.4th at 89.) A party meets this burden by demonstrating that the act underlying the claim fits one of the categories spelled out in section 425.16(e). *Braun v. Chronicle Publ'g Co.,* 52 Cal.App.4th at 1043.

Here, the City's claims all arise from protected activity. The act of filing a CPRA request, newsgathering, reporting on issues of public interest, the exercise of its right to Petition in filing the CPRA lawsuit are all protected by Section 425.16(e). *(See e.g. Lieberman v. KCOP Television* (2003) 110 Cal.App.4th 156, 162, 166 (2003) [SLAPP statute broadly applies to claims arising from allegedly tortious television newsgathering activities; "conduct" within the meaning of the SLAPP statute "is not limited to the exercise of [the] right of free speech, but to all conduct in furtherance of the exercise of the right of free speech"]; *Lafayette Morehouse v. Chronicle Publ. Co.* (1995) 37 Cal.App.4th 855, 864 [anti-SLAPP statute protected a newspaper and its reporters in a lawsuit "based on [their] news reporting activities"]; *Braun, supra,* 52 Cal.App.4th at 1043-45 [applying anti-SLAPP statute to media defendants; affirming order striking claims arising from articles about a state investigation]; *Sipple v. Found. for Nat'l Progress* (1999) 71 Cal.App.4th 226, 240 [granting anti-SLAPP motion as to libel claim arising from article about custody dispute); *Briggs v. Eden Council for Hope and Opportunity* (1999) 19 Cal.4th 1106, 1117 [citing with approval Lafayette court's holding that statute applies to media defendants]; *Thomas v. Los Angeles Times Communs., LLC* (2002) 189 F.Supp.2d 1005, 1013-1015 [striking lawsuit asserting claims of defamation based on article that raised questions about plaintiffs alleged World War II activities].

Once it is determined that the subject matter of litigation arises out of the Blog's protected activity, the City must show a probability of prevailing on its claim. In this case,

for all the reasons set forth above, the City could never meet its burden because the relief it seeks is an unconstitutional prior restraint and an order to identify and confiscate journalists' unpublished and source material. There is no authority, either in this state or in the nation, that would allow a government agency to stop the press from publishing information it lawfully obtained. (*ALADS,* 239 Cal.App.4th at 819 [noting the wealth of both State and Federal case law, discussing the protection journalists and the press enjoy under the First Amendment where there have been allegations that published or disclosed content had been illegally obtained by the source].)

In order to avoid the obvious application of the anti-SLAPP statute, the City alleges that the Defendants' have committed criminal acts – a serious and completely unfounded legal claim. However, the mere allegation of illegal activity is wholly insufficient to defeat an anti-SLAPP motion. If mere allegations of criminal conduct were sufficient to overcome these fundamental protections or an anti-SLAPP motion, allegations of criminal conduct would be in every complaint. But case law undermines such a result.

While illegal conduct has been long held to fall outside of protected speech, to defeat an anti-SLAPP motion, the criminal illegality must be conceded or the evidence must be "uncontroverted and conclusive" to trigger an exemption from anti-SLAPP because "to find otherwise would eviscerate the anti-SLAPP statute's protections because the plaintiff could preclude the statute's application simply by alleging criminal conduct by the defendant. (*Safari Club International v. Rudolph* (9th Cir. 2017) 845 F.3d 1250, 1259.)

In *Flatley v. Mauro* (2006) 39 Cal.4th 299, 320, the California Supreme Court first confirmed that the protections of the anti-SLAPP statute are not applicable when "the defendant concedes, or the evidence conclusively establishes, that the assuredly protected speech or petition activity was illegal as a matter of law." (*Id.* at 320.) While the Flatley court ultimately held that the conduct in that case was uncontested and illegal as a matter of law, it emphasized that the holding was "based on the specific and extreme circumstances" of the case. (*Id.* at 332.)

In *Flatley*, the Court differentiated between illegal conduct which can be proven as a matter of law "either through defendant's concession or by uncontroverted and conclusive evidence" and contested allegations of illegal conduct.

In cases where the illegal conduct is ***uncontested***, it is a preliminary question relevant to analysis of the first prong of an anti-SLAPP motion. "In such a narrow circumstance, where either the defendant concedes the illegality of its conduct or the illegality is conclusively shown by the evidence, the motion must be denied." (*Id.* (citing *Paul for Council v. Hanyecz* (2001) 85 Cal.App.4th 1356, 1365.)

However, this case does not involve a situation where the allegations of illegal conduct are uncontested. In fact, at every stage, Defendants have vigorously disputed that there was anything improper or illegal. In such a case, the California Supreme Court specifically held that the narrow exception cannot be resolved in the first step. "If... a factual dispute exists about the legitimacy of the defendant's conduct, it cannot be resolved within the first step but must be raised by the plaintiff in connection with the plaintiff's burden to show a probability of prevailing on the merits." (*Flatley*, at 316.)

In so ruling, the Court in *Flatley* relied on *Paul for Council,* 85 Cal.App.4th at, 1367-1368. In *Paul for Council*, an appellate court denied an anti-SLAPP motion but noted it was only because the defendants conceded the illegal nature of their activities, as a matter of law. (*Id.* at 1367.) The court the court then explicitly cautioned that if, "unlike the case here" illegality cannot be demonstrated as a matter of law, "then the claimed illegitimacy of the defendant's acts is an issue which the plaintiff must raise *and* support in the context of the discharge of the plaintiff's burden to provide a prima facie showing of the merits of the plaintiff's case....[T]his is an *additional* burden which the plaintiff must address." (*Id.* at 1367-1368.)[7]

---

[7] The cases following *Paul for Council* have unanimously headed this warning, overwhelmingly finding that mere allegations of illegal activity are insufficient to deny an otherwise meritorious motion to strike. (*See, e.g., Zucchet v. Galardi* (2014) 229 Cal.App.4th 1466, 1477–1480, [exemption not satisfied because the allegedly false testimony and statements to federal authorities were "still very much in dispute"]; *Reed v. Gallagher* (2016) 248 Cal.App.4th 841, 853 [claim of violation of Pen. Code § 115.2 was insufficient because no proof of intent to deceive or evidence of malice]; *Hansen v. California Dept. of Corrections and Rehabilitation* (2008) 171 Cal. App. 4th 1537, 1542 [allegations that defendant was involved in a "web of lies" that resulted in the search of

The proper analysis was once again confirmed by the California Supreme Court in the recent decision, *City of Montebello v. Vasquez* (2016) 1 Cal.5th 409, 424, a case conveniently ignored by the County, which held that contested allegations of illegal conduct were insufficient to overcome the first prong of the anti-SLAPP statute.

The City sued three of its former council members and a former city administrator, claiming they violated Government Code section 1090, by voting on a waste hauling contract in which they held a financial interest. (*Id.* at 412-413.) The defendants moved to strike the complaint under the anti-SLAPP statute, claiming that voting on the contract constituted protected activity. (*Id.)* In response, the City made the same claim that the County asserts here: that the anti-SLAPP statute does not apply because the allegations in the litigation were based on illegal conduct, which is not protected speech. (*Id.* at 424.)

However, the California Supreme Court found the "assertion of illegality" to be "premature." (*Id.)* "The first step of the anti-SLAPP analysis is limited to whether a claim arises from protected activity. We made it clear in *Flatley* that conduct must be illegal *as a matter of law* to defeat a defendant's showing of protected activity. The defendant must concede the point, or the evidence conclusively demonstrate it, for a claim of illegality to defeat an anti-SLAPP motion at the first step." (*Id.*) The Court noted that "defendants vigorously dispute [the allegations of criminal wrongdoing], both as a matter of law and a question of fact" and that when a "factual dispute exists about the legitimacy of the defendant's conduct, it cannot be resolved within the first step.... Instead, it must be

---

the plaintiff's home was insufficient]; *Cabral v. Martins* (2009) 177 Cal.App.4th 471, 482 [attorney's modification of an estate plan that allegedly assisted in the evasion of child support was "neither inherently criminal nor otherwise outside the scope of normal, routine legal services" to bar the defendant's use of the anti-SLAPP statute]; *M.F. Farming, Co. v. Couch Distributing Co.* (2012) 207 Cal. App. 4th 180, 195–197 (disavowed in part, on other grounds, in *Baral v. Schnitt* (2016) 1 Cal.5th 376, 396, fn. 11) [submitting allegedly fraudulent plans to a city in connection with permitting process did not trigger illegality exemption and bar use of the anti-SLAPP statute]; *Dwight R. v. Christy B.* (2013) 212 Cal.App.4th 697, 711–713 [allegation that therapist conspired to falsify evidence insufficient because the therapist did not concede that she engaged in any unlawful activity nor was there any uncontroverted evidence that her activities were unlawful as a matter of law].)

raised by the County "in connection with [its] burden to show a probability of prevailing on the merits." (*Id.*)

Such is the case here. Despite the City's claims, Defendants vigorously contest the City's baseless and unfounded allegations.

III. CONCLUSION

The basic purpose of the First Amendment is to prevent the government from imposing prior restraints against the press. "Regardless of how beneficent-sounding the purposes of controlling the press might be," the Court has "remain[ed] intensely skeptical about those measures that would allow government to insinuate itself into the editorial rooms of this Nation's press." (*Nebraska Press*, 427 U.S. at 560-561.)

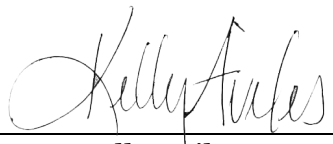
Consistent with that principle, over the last 75 years, the United States Supreme Court repeatedly has struck down prior restraints that limited the press' right to report about court proceedings. The Court has made clear that a prior restraint may be contemplated only in the rarest circumstances, such as where necessary to prevent the dissemination of information about troop movements during wartime, *Near*, 283 U.S. at 716, or to "suppress[] information that would set in motion a nuclear holocaust." (*New York Times*, 403 U.S. at 726 (Brennan, J., concurring).)

This case does not come close to presenting such extraordinary circumstances. Thus, the City cannot prevail as a matter of law, regardless of how the records were originally obtained. The City's requests are flatly unconstitutional in and Defendants, therefore, respectfully request this Court denying the City's request in its entirely.

Respectfully submitted,

DATED: October 25, 2019

LAW OFFICES OF KELLY AVILES



By: _____

Kelly Aviles
Attorney for Defendants
FRIENDS FOR FULLERTON'S FUTURE,
JOSHUA FERGUSON, and DAVID CURLEE

Exhibit K

JONES & MAYER
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Attorneys for Defendant
CITY OF FULLERTON

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON, Plaintiff, vs. FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive, Defendants.	Case No. 30-2019-01107063-CU-NP-CJC *Assigned for all purposes to:* *Judge Thomas A. Delaney, Department C24* **NOTICE OF RULING GRANTING PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 25, 2019, at 1:30 p.m. in Department C24 of this Court, Plaintiff City of Fullerton's Ex Parte Application to Ex Parte Application for a Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued was GRANTED. A true and correct copy of the Temporary Restraining Order entered by the Court is attached hereto as Exhibit "A."

Dated: October 25, 2019

JONES & MAYER

By: _____

Kimberly Hall Barlow
Bruce A. Lindsay
Monica Choi Arredondo
Attorneys for Defendant
CITY OF FULLERTON

EXHIBIT A

EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE SECTION 6103

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

OCT 25 2019

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

CITY OF FULLERTON, Plaintiff, vs. FRIENDS FOR FULLERTON'S FUTURE, JOSHUA FERGUSON, DAVID CURLEE, CHRISTOPHER TENNYSON, and DOES 1 through 20, inclusive, Defendants.	Case No. 30-2019-01107063-CU-NP-CJC *Assigned to the Hon. Thomas A. Delaney* **ORDER GRANTING PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED** *[Filed Concurrently with: Memorandum of Points and Authorities; Declaration of Matthew Strebe; Declaration of Mea Klein; Declaration of Steve Lee; Declaration of Bruce A. Lindsay; and Declaration of Kimberly Hall Barlow* Date: October 25, 2019 Time: 1:30 p.m. Dept.: C24

[PROPOSED] ORDER

Plaintiff City of Fullerton's ("the City") Ex Parte Application for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Be Issued came on regularly for hearing on October 25, 2019, at 1:30 p.m. in Department C24 of this Court, before the Honorable Thomas A. Delaney.

Having considered all papers submitted in support of and in opposition to the City's Ex Parte Application, the admissible evidence submitted by the parties in connection with the City's Ex Parte Application, and the arguments made by counsel, and good cause having been shown,

IT IS HEREBY ORDERED THAT the City's Ex Parte Application is hereby **GRANTED** as follows:

(1) Defendants and their officers, agents, servants, employees, assigns, and all those acting in active concert or participation with them are hereby temporarily restrained from doing any of the following:

(a) Deleting, altering, destroying or removing any of the privileged and confidential City Dropbox folders and files listed at Exhibit A, or the documents contained therein, saved in any computers, servers, and storage media (e.g., hard drives, flash drives, thumb drives, CD-ROMs, DVD-ROMs, etc.), or existing in hard copy form, under the possession, custody or control of the Defendants and/or any third parties who may have acted in concert with the Defendants or with whom the Defendants may have shared such documents and data. Such documents and data shall be preserved until such time as they may be examined as part of the litigation and the Court determines whether they should be permanently destroyed under Court-appointed supervision. Defendants and all third parties who may have acted in concert with them are under a mandatory preservation order prohibiting them from destroying the records at issue in this litigation, as listed in Exhibit A, pending hearing on the City's Order to Show Cause;

(b) Deleting, altering, destroying or removing any written communications or memorialization of communications concerning the documents and data described at Paragraph (1)(a) above.

(c) Deleting, altering, destroying or removing any summaries of the documents and data described at Paragraph (1)(a) above;

(d) Further accessing or attempting to access the City's private computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(e) Conspiring with any third parties to access or attempt to access the City's private computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(f) Removing, copying, extracting or downloading any information or data from the City's computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(g) Conspiring with any third parties to remove, copy, extract or download any information or data from the City's computer networks, private folders stored in any City File Sharing accounts, and/or City servers, without the City's authorization;

(h) Engaging in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of the City's computer networks, the City's File Sharing accounts, and/or City servers; and

(i) Conspiring with any third parties to engage in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of the City's computer networks, the City's File Sharing accounts, and/or City servers;

(j) Selling, publishing, distributing, disclosing or otherwise using any of the information or documents obtained from the City Dropbox folders and files listed at Exhibit A, without the City's permission, or a valid court order; and

(k) Conspiring with third parties to sell, publish, distribute, disclose or otherwise use any of the information or documents obtained from the City Dropbox folders and files listed at Exhibit A, without the City's permission, or a valid court order; and

(2) An Order to Show Cause Why a Preliminary Injunction Should Not Be Issued is set for November 21, 2019, at 9:00 a.m. in Department C24. Defendants shall appear at such time,

to show cause why the preliminary injunctive relief sought in the City's Ex Parte Application for Temporary Restraining Order should not be granted. The briefing schedule shall be as follows:

(a) Plaintiff's Ex Parte Application and supporting papers are deemed the moving papers.

(b) Plaintiff shall file any supplemental brief in support of its motion for preliminary injunction by November 1, 2019, and served on counsel and the Court by electronic mail by 5:00 p.m. that same day;

(c) Defendants shall file their opposition by November 8, 2019, and served on counsel and the Court by electronic mail by 5:00 p.m. that same day;

(d) Plaintiffs shall file their reply by November 14, 2019, and served on counsel and the Court by electronic mail by 5:00 p.m. that same day.

This Order does not apply to the lawful access to the City's public website (https://www.cityoffullerton.com) or any of the public social media accounts of the City or any of its Departments or to documents intentionally produced in response to a Public Records Act request.

IT IS SO ORDERED.

Dated: October 25, 2019

Hon. Thomas A. Delaney
JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

STATE OF CALIFORNIA)

COUNTY OF ORANGE) ss.

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 3777 North Harbor Blvd. Fullerton, California 92835. On October 25, 2019, I served the foregoing document described as **NOTICE OF RULING GRANTING PLAINTIFF'S EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED**, on each interested party listed below:

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XX (VIA ELECTRONIC SERVICE) I served the documents by electronically transmitting the document(s) listed above to the e-mail address(es) of the person(s) set forth.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. Executed on October 25, 2019, at Fullerton, California.

Monica Choi Arredondo

Exhibit L

SUPERIOR COURT CALIFORNIA
COUNTY OF ORANGE CENTRAL JUSTICE CENTER
DEPARTMENT C-24 HON. THOMAS A. DELANEY, JUDGE

CITY OF FULLERTON,	)	
	)	
Plaintiff,	)	
	)	
VS.	)	NO.
	)	30-2019-01107063
FRIENDS FOR FULLERTON'S FUTURE;	)	
JOSHUA FERGUSON; DAVID CURLEE;	)	
CHRISTOPHER TENNYSON; and DOES 1	)	
through 20, inclusive,	)	
	)	
Defendants.	)	
_____	)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Date and Time: Friday, October 25, 2019
3:10 p.m. - 3:35 p.m.

Location: Orange County Superior Court
700 Civic Center Drive
Department C-24
Santa Ana, California

Reporter: Jay M. Bullard
CSR No. 3455
Official Court Reporter Pro Tempore

Job No. 17253

APPEARANCES:

FOR THE PLAINTIFF: JONES & MAYER
BY: KIMBERLY HALL BARLOW, ESQ.
BY: MONICA CHOI ARREDONDO, ESQ.
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FOR THE DEFENDANTS: LAW OFFICES OF KELLY A. AVILES
BY: KELLY A. AVILES, ESQ.
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La Verne, Ca 91750
(909)991-7560
kaviles@opengovlaw.com

Santa Ana, California - Friday, October 25, 2019

Afternoon Session

(The following proceedings were had in open court:)

THE COURT: All right. We're on the record in the City of Fullerton vs. Friends For Fullerton's Future, et al. Counsel, please state your appearances.

MS. BARLOW: Good afternoon, Your Honor. Kimberly Hall Barlow, Jones & Mayer, on behalf of Plaintiff City of Fullerton.

THE COURT: Ms. Barlow.

MS. ARREDONDO: Good afternoon, Your Honor. Monica Choi Arredondo from Jones & Mayer on behalf of Plaintiff City of Fullerton.

THE COURT: Good morning.

MS. AVILES: Good afternoon, Your Honor. Kelly Aviles on behalf of Defendant Friends For Fullerton's Future, Joshua Ferguson and David Curlee.

THE COURT: Ms. Aviles, good afternoon.

MS. AVILES: Good afternoon.

THE COURT: I think I said good morning twice.

MS. AVILES: I haven't had my coffee yet, so it's still kind of dragging.

THE COURT: You're late.

Okay. I've read the papers. That's a stack, as you know. Here is where I'm at. There's a real question in my mind on the evidence as to how these documents were

obtained. For that reason alone, I'm not sure that the Plaintiff has met its burden of proof that they're likely to succeed on the merits. I also have an issue with irreparable harm, given that this issue has been going on since June.

I understand the City has undertaken a number of efforts, including at least two cease and desist letters since that time. And, frankly, to some extent, I have to credit them, I suppose, for not rushing to the court. But now here we are in October, and they're seeking what does I think, to some extent, at least, raise constitutional questions on the First Amendment.

So what I propose to do -- and I recognize I think I read we're dealing with some potential attorney-client privilege issues, which always catch my attention, not unlike private documents, financial or otherwise. So I recognize there are some issues with some of these documents.

Again, I have a real question in mind that I don't think we can resolve today about how these documents were obtained. I understand that the Defendant is making the point that it doesn't matter how they're obtained. I'm not sure that's true or not, but that supports, to me -- I'm not sure that that's accurate under the law, I should say, but that supports my tentative decision to deny the temporary restraining order but grant a motion for preliminary injunction, which I would set for early December so that we

can set this up a little bit more properly and I can consider the arguments more fully.

I don't think I can issue a temporary restraining order, not only based on the evidence and my reading of the papers so far, but also because I am concerned that it would be a restraint on freedom of speech under the First Amendment.

So that's where I'm at right now. Ms. Barlow, Ms. Choi, who's going to argue?

MS. BARLOW: I will, Your Honor. Thank you.

THE COURT: Ms. Barlow.

MS. BARLOW: I want to say something that may sound funny, Your Honor, but this case has nothing to do with the First Amendment. They can say whatever they want to say about Fullerton. Anything they lawfully acquire, they can publish.

What we're here for is because they stole documents that belong to the City. Not only were they documents that belonged to the City, they were a zip file -- several zip files, actually, specifically compiled by city staff for the city attorney to review, full of confidential documents, draft settlement agreements, emails between counsel, private personnel records and legal strategies about how to deal with those. Thousands and thousands and thousands of files in a particular format that they couldn't possibly get any other way but the way that we've

1 demonstrated they downloaded them.
2 Now, I think we've offered some pretty
3 compelling evidence, Your Honor, and particularly if you look
4 at Exhibit D of Mr. Strebe's declaration, and even on the
5 first page of Exhibit D, the ACUSA_PRR.zip. That was a
6 File -- a folder put together for attorney review. It was
7 not produced to anyone voluntarily. It was not released to
8 any of the defendants.
9 So when Ms. Aviles said oh, we're speculating
10 because Mr. Ferguson accessed the link that we sent him for
11 documents he asked for, that that means he stole these other
12 records. That's not the case at all. He stole these
13 records. It's right there, his name.
14 THE COURT: You're saying exhibit --
15 MS. BARLOW: His IP address.
16 THE COURT: -- Exhibit D to whose declaration?
17 MS. BARLOW: It's Mr. Strebe. That would be the
18 forensic expert, Your Honor.
19 THE COURT: Got it.
20 MS. BARLOW: On the very first page it shows
21 Mr. Ferguson himself accessing through Dropbox, the city's
22 Dropbox and downloading and accessing a confidential
23 attorney-client privileged zip file containing PST files that
24 would never be produced in that format to anyone else. And
25 it goes on and on and on.
26 I think Mr. Strebe -- of course, we can't prove

with 100 percent certainty -- even a criminal court doesn't require 100 percent certainty -- that Mr. Ferguson stole a specific piece of paper at a specific time. We can't do that. But we can prove that Mr. Ferguson and Mr. Curlee -- I'm sorry, what's the other one? Mr. Tennyson, who also worked at the camera shop, that they accessed the city's private Dropbox from their place of employment and downloaded documents onto that computer system. Again, documents intended solely for review by the city's attorney.

So this is not about them being a newspaper. This is about theft. This is about stealing. All of the cases on this say, well, we're not going to enjoin the release or publication of documents that they got from some third party that behaved improperly, but none of them say it's okay for you to steal documents and then put the First Amendment shield in front of you and say I get to do whatever I want with what I stole.

So, if Mr. Ferguson, instead of accessing unlawfully the city's Dropbox, had come into my office for a deposition, say, and asked where the restroom was, was directed to the restroom, and instead he walked into a storeroom, according to Ms. Aviles, all he has to do is walk over and grab an attorney-client privilege folder out of that storage unit or storage office, walk out the door with it, and he can publish whatever he wants with impunity. And not only that, she's going to sue us anti-SLAPP, which won't work

because the cases are pretty clear that there is no anti-SLAPP defense to hacking, Malin vs. Singer, 217 Cal App 4th 1283 from 2003.

You don't get to hack into a computer system, steal documents and information, publish it and say oh, it's all good because I'm a reporter. That's just not how it works.

As far as the irreparable harm, Your Honor, I think the Court's point about the attorney-client privilege I think -- the First Amendment has high priority in our jurisprudence, absolutely. The attorney-client privilege, in my view, Your Honor, has even higher priority in our jurisprudence, and the reason for that is because that relationship is so critical. The client has to be able to be honest with the attorney or there's no point to having a judicial system at all.

So Ms. Aviles says No. No. No. No, we don't care what's in them. Once they have them in their hand, they get to publish whatever they want. Ms. Klein's declaration and Mr. Strebe's declaration make 100 percent clear that Mr. Ferguson and his cohorts unlawfully downloaded private, privileged documents. There's no getting around that.

So I understand the Court's concern, but I want to point out if the Court takes a really close look at our request at what we've asked for in the restraining order, the primary things that we've asked for are to keep them from

1 trying now to hide their criminal activity by deleting
2 documents, removing them, transferring them to someone else,
3 transforming their form, removing their communications with
4 each other about their theft and their access to these
5 documents, accessing or attempting to access the city's
6 private computer systems and networks, conspiring with others
7 to do so, removing or copying or extracting or downloading
8 any further information. That's what we're asking for
9 primarily, Your Honor.
10 It happened that in this case, because they've
11 already stolen things, they now have in their possession
12 confidential and privileged documents. And Ms. Aviles'
13 argument, prior restraint, gives them until December, Your
14 Honor -- we have a hearing on preliminary injunction -- to go
15 through all 11,000 documents in that single file, and all the
16 other thousands in the others, and publish whatever they want
17 with impunity. And I can't protect my client -- my privilege
18 with my client. I can't protect the privacy of my police
19 officers and other employees who are protected by California
20 law and federal law in their personnel records, in their
21 private medical information which may be contained in those
22 files, in their private medical information about their
23 families and why they may need to take a leave or why they
24 engaged in certain conduct.
25 The possible harm, Your Honor, is to thousands
26 of people in thousands of ways. And the fundamental problem

1 is they haven't offered a single shred of evidence, other
2 than Ms. Aviles saying so, that they, quote, unquote,
3 "lawfully" obtained these records. There's not a declaration
4 that they got it from a third party or they got it from an
5 unnamed employee, no. Not a single piece of evidence, Your
6 Honor, in the face of an extensive forensic analysis.
7 We didn't come in in June, Your Honor, because
8 we hadn't done that forensic analysis. We didn't have
9 evidence in June, other than that they published the paper.
10 At that time we didn't know where they got them. But that's
11 what led to the discovery of this problem and led to the
12 forensic investigation that brought us here today.
13 So for Ms. Aviles to say oh, they waited, they
14 waited all this time, he's still publishing protected
15 information filed with this very court last week -- no. On
16 the 10th, pretty close to last week, served to the city on
17 the 17th, and it included a confidential draft of a personnel
18 employee's settlement agreement with counsel's comments
19 clearly notated on the side. Now, the comment itself was
20 deleted, but there's highlighted areas with a notation
21 that -- one of the attorneys made a notation there.
22 And these PST files, I think, Your Honor, it
23 makes it clear from Mr. Strebe's declaration, they're
24 manipulatable. So they can take this information that they
25 stole and that they're holding and they can change it, put
26 fake information in there and then publish it for all the

1 world to see. And what is the remedy for that exactly?
2 There isn't one.
3 And for Ms. Aviles to say I've got to go get a
4 criminal conviction before this Court can constrain them from
5 further taking advantage of their unlawful criminal conduct,
6 criminalized both by the federal government and the state
7 government.
8 And there's several cases, and we cited them,
9 Your Honor, that says you don't get to take advantage,
10 newspaper, or whatever you want to call yourself, blog, of
11 criminal misconduct that you, yourself, perpetuated. Not
12 some third party that you didn't have any control over, you,
13 yourself. And that's what we're here about today, Your
14 Honor.
15 THE COURT: All right. Thank you, Ms. Barlow.
16 So, Ms. Aviles, I do have -- I do recognize
17 there may be a dispute, and I recognize the short period of
18 time you've had to oppose this, which is probably some of
19 your explanation for not providing much more evidence to
20 support your position that these documents have not been
21 stolen. I know part of your argument is it doesn't matter.
22 MS. AVILES: Another part of our argument is that it's
23 protected by the California Shield Law and the reporter's
24 privilege.
25 THE COURT: Please don't interrupt me.
26 MS. AVILES: I apologize, Your Honor.

1 THE COURT: It's okay. The other problem is I do see
2 substantial harm because particularly with regard to the
3 plaintiff -- the attorney-client privileged information
4 that's been represented. I think there's also some competing
5 harm when it comes to the First Amendment, but I've got a
6 question about that and whether it applies, which is why I am
7 willing to grant a preliminary injunction hearing in the near
8 future, and we'll talk about that. But the real question
9 here is: What do I do with the TRO? And what's the harm in
10 me having you -- and I do think, to the extent I was
11 considering -- or I am considering granting a TRO, I think --
12 for all of its language, I think the proposed TRO is narrow
13 enough to address the issues.
14 So go ahead. What do you say?
15 MS. AVILES: Okay. Let me address first whether
16 they've said that this is not a prior restraint. Can you
17 imagine what it would be like if the only thing you had to do
18 was come in and make some allegation of criminal conduct and
19 that would stop the presses? That's not the way our system
20 of government works. It's not the way the First Amendment
21 works.
22 You can -- there is no question that if someone
23 were to commit an unlawful act -- let's say I broke into the
24 city's offices and I stole files. That certainly is an
25 unlawful act. But the case law says that the government may
26 not prohibit the publication of information once it falls

1 into the hands of the press, but it may deny access to
2 information, it may punish its staff, but it cannot stop the
3 publication of it.
4 And when we're talking about competing values,
5 there is no question that the First Amendment is the highest
6 of values that we place here in this country. While I'm an
7 attorney, I certainly have a special place in my heart for
8 attorney-client privilege, but the courts have said -- we
9 cited in Hurvitz, it was doctor-patient privilege, and the
10 court said a doctor-patient privilege, nor any other
11 privilege, could come close to meeting this requirement. In
12 fact, in the history of our country, there has never been a
13 prior restraint that's been upheld for any reason.
14 So we're talking about things like the
15 possibility -- courts have discussed maybe the possibility of
16 troop movement in wartime. Even things, for example, like
17 national security.
18 When you go to the seminal case, The New York
19 Times vs. United States, that case was about the Pentagon
20 papers, national security. In all of those cases, and in a
21 number of others that I cited in my brief and we can talk
22 about, there is always this allegation of criminal conduct.
23 You got the information -- the agency obtained the
24 information illegally, the newspaper, the journalist obtained
25 it illegally. That comes through in a wide variety of claims
26 about criminal misconduct, receiving stolen goods,

1 eavesdropping, publishing information in violation of a
2 criminal statute. There is a case it was unlawful to publish
3 the name of a rape victim. There was a criminal statute.
4 The court struck that down.
5 All without question because the prohibition on
6 restraining speech is so harmful to our values that things
7 just don't -- nothing has come close to meeting that yet.
8 And certainly this has already been addressed by our cases.
9 For example, in the recent case in the Second
10 District, Association for Los Angeles Deputy Sheriffs, that
11 was information that The Times had obtained. They alleged
12 The Times obtained it illegally. And the court said you
13 can't just go around making allegations of criminal activity
14 and that would support a prior restraint. That would just
15 lead to more people making allegations of criminal activity.
16 If you then go to the other problems they have.
17 We don't have the burden to prove where these documents came
18 from, the ones that have been published. And they've just
19 made these statements that there are others without facts.
20 The fact, for example, if you go through, and I
21 did, and I don't know anything really about IT. So I talked
22 to a few people very late last night about the declarations
23 and what they actually showed. So it's very interesting to
24 me, because they go through the security -- the person who's
25 talking about security and their forensic analysis, says,
26 well, there were files, and they were obtained by someone who

1 was using a virtual private network or this TOR, which I'm
2 not sure what it is, but apparently it also blocks your
3 identity, and, therefore, it must be Mr. Ferguson. It's got
4 to be.
5 But by its very declaration, if you can't
6 identify the person who is behind the virtual private
7 network, be it Russian Bots, be it who knows, but you can't
8 then have any kind of chain of custody to a particular
9 individual, no matter how much you want it to be that person.
10 That's not even getting into these extremely
11 questionable claims about whether this could -- the conduct
12 they're even alleging could violate the law. They're saying
13 we sent somebody a Dropbox link. We gave them a password.
14 They accessed the Dropbox link. They accessed the password,
15 and then they took documents in a folder with their name on
16 it that didn't belong to them.
17 Can you imagine if in all of your cases -- I'm
18 sure you have a lot -- where there are some inadvertent
19 disclosures in discovery to attorneys? So, if you get a
20 document -- and attorneys have a much different standard, you
21 know. We would have to notify the other side. We would have
22 to return it. Other people do not have that responsibility.
23 So can you imagine if every time somebody sent
24 a document inadvertently to another party, that they looked
25 at it and then they were somehow criminally liable because
26 they exceeded their authorization? It's such a questionable

1 claim.
2 And in just my little bit of time that I've had
3 to prepare for this, there are a number of discussions online
4 about this statute and its applicability to journalists and
5 whether it's constitutional. So I think there's very serious
6 claims about the underlying questions as well that we haven't
7 even had time to get into.
8 Finally -- maybe not finally. This is also a
9 SLAPP. So there is a lot of case law on SLAPP actions. This
10 is clearly protected activity. Everything they talk about in
11 their papers rises from protected activity. So making a
12 public records request is a protected activity. Reporting on
13 that, newsgathering, reviewing documents to publish, filing a
14 lawsuit to compel disclosure, all of those things are
15 protected activities.
16 So the burden would then switch to them to show
17 that this was -- they were likely to prevail on the merits.
18 For a lot of the reasons I've already mentioned about the
19 other cause of action, it's nearly impossible.
20 So the question then becomes does the
21 exemption -- there is an exemption that says criminal conduct
22 isn't covered by the SLAPP statute. But then guess what
23 happens? Everybody alleges criminal conduct.
24 So the courts went back and said you don't get
25 to just allege criminal conduct in order to invoke that
26 exemption. There has to be an admission of criminal conduct.

1 It cannot just be a mere claim that's disputed. And we've
2 cited those, even though it's not our anti-SLAPP motion,
3 which we expect to be filed Monday. We've cited those cases.
4 So we can undermine this claim that somehow just saying
5 something's criminal is enough to bring somebody into court
6 and go through their records.
7 The next problem is their request asks for some
8 kind of forensic auditor to go through our records. That's
9 absolutely prohibited by the California Constitution and the
10 Shield Law. The Shield Law does not let a third party come
11 in to review a newspaper's material.
12 I can only imagine if Donald Trump had some
13 idea that this claim could even be made here because it's
14 amazing. Even with all the questionable issues we've had
15 around First Amendment in the past few years, seriously, this
16 takes it even further.
17 So I'm troubled that this isn't more of a
18 concern for the city, and the city has turned around and
19 retaliated against my client. Even the first -- even the
20 letters were retaliatory. Even yesterday counsel said if you
21 just give us back the records, we'll drop this whole thing.
22 I mean, it's clearly punitive in nature. And the press is
23 not supposed to be punished like that. And allowing a
24 government agency to do so, just raises the most serious of
25 questions. And I think that warrants at least a noticed
26 motion and time to bring forth the evidence in front of this

1 Court that would further undermine their claim.
2 The last thing is that you're right, there is
3 no -- you can't create your own urgency. So, for example, in
4 their declaration, the Lee declaration that talks about we
5 advised the city that there is a breach in their network.
6 Let's forget about the fact that their network is not
7 Dropbox. Dropbox is a whole separate software program. It
8 has nothing to do with one or the other. But, even if at one
9 point you said well, you should really secure your network,
10 and that's going to take about 30 days. It's been 120 days.
11 They still sat on that.
12 THE COURT: I'm not sure I agree with that. They've
13 been sending you letters or sending your client letters.
14 MS. AVILES: The last letter was in July, Your Honor,
15 in the beginning of July. The first letter was in June, June
16 24th, I believe, and the second letter followed I believe ten
17 days after that, so there's been nothing.
18 In that letter -- when I responded to that
19 letter, I said you haven't identified any documents. Even if
20 I was to go back and say hey, client, do you have these
21 documents? How would I know what they're even talking about?
22 I have no idea.
23 The one thing they pointed out in their initial
24 correspondence was a folder with his name on it. It's kind
25 of laughable that they could then come into court and say
26 wow, you opened the folder that had your name on it and now

1 you're a criminal. It's just -- it's just such a low
2 standard for such a big infringement. And that's the concern
3 that I have here about not letting all of the evidence come
4 to light and attempting to sneak this in.
5 I have a great story. Yesterday I was in
6 appellate court, and the appellate court had my phone, and I
7 walked out at 12:30 and turned it on and found out they were
8 coming in at 1:30. I got no notice of this. And the only
9 reason to try to sneak it in like that is to avoid a full
10 airing of the evidence. To avoid giving us time to bring in
11 a declaration from another forensic expert explaining the
12 gaps and the holes and the logical fallacies that are in the
13 forensic analysis that the city has provided.
14 We can also talk about the fact that they're
15 claiming now that because we filed a lawsuit, that that's
16 what triggered this, that there was some document in our
17 lawsuit.
18 The documents that are in our lawsuit were
19 published months ago on the blog. They're not new documents.
20 They're not documents that the city didn't know were in my
21 client's -- on my client's blog. These are documents that
22 have been around forever. And the city conveniently didn't
23 say when the last time something was published that they
24 believed was improperly obtained.
25 They also -- and I'm not sure about why. If
26 this is a Dropbox -- they haven't made any allegations that

1 my clients did anything to their computer network. So if
2 this was a Dropbox account, and you thought somebody was
3 improperly accessing your Dropbox account, what would be the
4 first thing you'd do? You'd just close your Dropbox account.
5 You'd just change the security on your Dropbox account.
6 Maybe you open a new Dropbox account if you were really
7 concerned.
8 So I don't know whether City did that or not,
9 but it's suspicious to me that there's nothing in there about
10 why that couldn't have been done immediately and rectified
11 all their problems.
12 The security expert said don't -- if you take
13 their word for it, don't come to court until you've got your
14 network secured. Well, presumably, if we're here, their
15 problems are secured, and my client couldn't access any
16 further information even if that was what he was doing in the
17 first place. Even if he were hacking into their system, they
18 now believe their system is secured, their Dropbox account
19 must be secured. There is no further risk that needs to be
20 enjoined here.
21 THE COURT: Is it true that this material has already
22 been disseminated so it's a moot issue?
23 MS. AVILES: Yes, it's been disseminated on the
24 website for months, Your Honor.
25 THE COURT: All of it?
26 MS. AVILES: I don't know, Your Honor. I specifically

1 don't know. With my newspaper clients, I try not to ask
2 because then there could be some issue about me being a
3 witness and representing hem.
4 I don't know, and it's not my business whether
5 they have disseminated all the information they have or not.
6 But I do know that there's been -- as far as I know, there's
7 been nothing new.
8 Last night I asked if we could continue this
9 until Monday because I had an appointment for my son in Los
10 Angeles. They would not continue it to Monday because --
11 MS. BARLOW: I'm out of town Monday.
12 MS. AVILES: I asked for Tuesday.
13 -- Because we were going to publish everything.
14 Nothing was published last night. They haven't pointed to
15 any harm that's happened since my clients were alerted to
16 this.
17 It's just -- their concerns are so skeptical --
18 or speculative that, given the weight of the issues involved
19 and the very serious rights that are involved, it just -- I'm
20 not sure how you could fashion an order that would comply
21 with the Constitution in this case.
22 THE COURT: All right. Ms. Barlow, I didn't
23 appreciate the comment that you made during Ms. Aviles'
24 comments. I know that you care deeply about your case.
25 Clearly she does, too. And I care mostly about the process
26 that we are going to undertake, so I ask that you never do

1 that again in this courtroom.
2 MS. BARLOW: I apologize, Your Honor.
3 THE COURT: I'm going to give you a schedule for
4 preliminary injunction. I don't know that I can grant at
5 this point a TRO based on what I have before me, so I'm still
6 sort of back where I am before.
7 With that, just so you know, and I'll give you
8 the briefing schedule later, but because of the concerns I
9 have for both the documents that are out there, whether they
10 have been produced or not, the documents at issue, including
11 attorney-client privilege documents and any First Amendment
12 issues -- I know you dispute that there are any. Based on
13 what I've seen so far, I think there are some. They need to
14 be filtered out. I would put the hearing sooner than I
15 anticipated, and it would be on November 21st. That gives
16 you both plenty of time to fully brief the motion for
17 preliminary injunction.
18 That said, I want to hear from you one more
19 time on the TRO, whether I should grant it. And I don't
20 think I would grant either the TRO or the preliminary
21 injunction issue on paragraph number two, on the forensic
22 examiners, but that I would welcome briefing on that in terms
23 of the motion for the preliminary injunction and whether I
24 should order that as part of that. Go ahead.
25 MS. BARLOW: All right. Thank you, Your Honor.
26 First, I want to go back to the assertion that Ms. Aviles

1 made that we just came in here with a bald allegation of
2 criminal conduct.
3 THE COURT: There's evidence. You've shown me
4 evidence.
5 MS. BARLOW: Lots of evidence, Your Honor.
6 THE COURT: I'm not sure it's persuasive yet, that's
7 why I am doing the preliminary injunction. I heard that, and
8 I agree with where you're at.
9 MS. BARLOW: All the cases counsel have cited to,
10 every single one of them, whether the materials were stolen
11 or not, the person who was being enjoined wasn't the thief.
12 This is that case. The Marin County case, Your Honor, Marin
13 Independent Journal vs. Municipal Court, is a case involving
14 a prior restraint. A photographer took a photograph in a
15 courtroom without permission, and the judge had her camera
16 and her film seized. And the court of appeal upheld it,
17 because it was in direct violation of the law and a court
18 order.
19 So she's wrong when she says there's no case
20 out there that says that. And, in fact, the United States
21 Supreme Court said in the -- which case is it? This is my
22 bad. I took it out. One second, Your Honor. Bartnicki vs.
23 Vopper, I believe. If the Court needs the citation on that.
24 THE COURT: Please.
25 MS. BARLOW: That is 532 US 514, 2001. The court's
26 opinion -- I'm looking for the pin cite, Your Honor. It's

1 hard to find in the lawyer's edition. "Our holding, of
2 course, does not apply to punishing parties for obtaining the
3 relevant information unlawfully. It would be frivolous to
4 assert, and no one does in these cases" -- except we are
5 hearing it today -- "that the First Amendment in the interest
6 of securing news or otherwise confers a license on either the
7 reporter or his news sources to violate valid criminal laws.
8 Although stealing documents or private wiretapping could
9 provide newsworthy information, neither reporter, nor source,
10 is immune from conviction for such conduct."
11 The court didn't rule on the specific issue
12 because it wasn't before it. In that case it was not the
13 newspaper which had stolen the information, and there was a
14 concession to that fact.
15 For counsel to argue incorrectly that he has to
16 admit that he stole it before this Court can enjoin the
17 activity is wrong.
18 THE COURT: It has to be undisputed -- admitted or
19 undisputed in the context of an anti-SLAPP motion.
20 MS. BARLOW: Well, this isn't an anti-SLAPP motion,
21 Your Honor.
22 THE COURT: Understood.
23 MS. BARLOW: And the cases say not just if it's
24 undisputed or if it has been -- where is it? With competence
25 I think is what the word was, that it has been established
26 competently. Not beyond dispute, not beyond a reasonable

1 doubt, but through competent, admissible evidence.
2 Now, it may seem like not evidence, the fact
3 that they even downloaded documents through their same secret
4 places with the same identifiers and the same VPN and the
5 same routers of even the documents that were produced
6 voluntarily to them. That just seems too coincidental to be
7 possibly coincidental. It just isn't.
8 And again, Your Honor, this is not about
9 publication, although we certainly would not like to have
10 those privileged documents published, and by no means have
11 they all been published. Thousands of documents have been
12 taken. They've published a few so far. And we have an
13 example of one where they changed it before they published it
14 different from the version that they attached to their
15 Complaint. They manipulated it.
16 The ALADS case, again, there was no evidence in
17 that case that the documents had been taken by the news
18 reporter in that case, so it's distinguishable. And again I
19 cite the Court to the Malin vs. Singer case on the issue of
20 SLAPP not protecting what is at issue here, which is hacking,
21 stealing, taking that which does not belong to you.
22 THE COURT: Well, it's a combination for me, and isn't
23 it in the law a combination of not only how it was obtained,
24 but what it is? If we're talking about private information
25 of other individuals who are not present here today or
26 attorney-client privileged information of anybody, and it

1 happens to be where there's evidence that it was stolen,
2 doesn't it require both? If we're talking about information
3 that makes no difference to anybody, it doesn't matter, but
4 if we're talking about this type of information that may have
5 been obtained illegally, and there's evidence of that -- I'm
6 not making any findings today, because I don't need to, and I
7 don't have enough to make findings, other than that there is
8 evidence that these documents were obtained illegally.
9 MS. BARLOW: If I may, Your Honor, with respect to the
10 order. Even if the Court doesn't grant the order for them to
11 give the documents back to us or appoint a third party
12 forensic specialist, please, Your Honor, they will with
13 certainty, given that they illegally accessed -- and no, a
14 misrepresentation by Ms. Aviles. We did not give them the
15 password to these files or our Dropbox. We did not do that.
16 So that's false, absolutely false.
17 He didn't just happen upon this file that had
18 his name on it. He went looking for it. And it was a file
19 that he already had been told had too many documents in it
20 and would he narrow the scope of his request so that we could
21 actually respond. So he knew it wasn't for him.
22 But the restraining order also asks for
23 prevention of them destroying evidence and destroying and
24 hiding the documents and passing them on to others, Your
25 Honor. And please, at a minimum, give us that.
26 THE COURT: All right. Give me a few minutes. What

are the chances that you can email me your drafts?

MS. BARLOW: We'll have it done in a minute, Your Honor.

THE COURT: All right. When I leave the bench, I'm going to take this under submission for a few minutes. I'm going to tinker with the proposed order that you're going to email to Ms. Stiltz, and I'll get you the ruling. I'll come back out and give you the ruling and sign the order.

MS. ARREDONDO: Can I get the email address?

THE COURT: You can get it in one second, as soon as I leave the bench.

MS. AVILES: Thank you, Your Honor.

MS. BARLOW: Thank you, Your Honor.

MS. ARREDONDO: Thank you, Your Honor.

(Recess)

THE COURT: We're back on the record in the City of Fullerton vs. Friends For Fullerton's Future.

So I am granting the temporary restraining order along with the OSC, the hearing on the OSC re preliminary injunction. My concerns are balanced as I see it, anyway. You may both disagree with that.

But the reality is I'm concerned about how these documents were taken -- or obtained I will say and what they are, but I'm also concerned about any potential First Amendment issues, particularly with regard to prior constraints. And additional work needs to be done by the

1 parties, and particularly this Court, to determine where the
2 law lies in terms of what's going to happen with these
3 documents, and that's why my initial plan was to set this in
4 December, but I moved it to February 21st.
5 MS. BARLOW: I'm sorry, Your Honor, November?
6 THE COURT: November 21st.
7 MS. BARLOW: Thank you.
8 THE COURT: At 8:30 a.m. With any supplemental -- the
9 ex parte is going to be deemed the moving papers. If the
10 Plaintiff wants to supplement them, that is due by next
11 Friday, November 1st, with service upon opposing counsel and
12 the Court by 5:00 p.m. electronically. Any opposition will
13 be due the following Friday, November 8th, with electronic or
14 email service upon counsel and the Court by 5:00 p.m.
15 You'll get an email that you're to use for this
16 purpose only from the court when I leave the bench. A reply
17 will be due on November 14th also served by electronic mail
18 to counsel and the Court by 5:00 p.m. The hearing is going
19 to be on Thursday, November 21st in this department at 8:30
20 a.m. And that's all contained in the order.
21 I understand and forgot to mention, Ms. Aviles,
22 that in your papers you indicated you wanted to file an
23 anti-SLAPP. The anti-SLAPP will be heard on the same date
24 and time, November 21st at 8:30 a.m. And it makes sense to
25 me to have the same briefing schedule for that with the same
26 manner of service. November 1st it will be due. You said

you are going to file it tomorrow. You now have to November 1st to file that.

MS. AVILES: That's much appreciated.

THE COURT: The opposition will be due by November 8th, same manner of electronic service, same time. The reply will be due November 14th, the same manner of service, the same time, the hearing at the same date, time and location. That part is not in the order. So I would need -- I'll just have you give notice of that, since that's really not before me, but you've made that request and for court efficiency, and because they're related, I want them heard at the same time.

MS. AVILES: Great.

THE COURT: So you're going to give notice of my order.

MS. AVILES: As to the anti-SLAPP only?

THE COURT: Only, correct.

MS. AVILES: Okay.

THE COURT: Everything else is going to be contained in the order you're going to get before you leave here today.

THE CLERK: Reservation number?

THE COURT: For the anti-SLAPP.

THE CLERK: For November 21st at 8:30 in department C24, reservation number 73155880.

MS. AVILES: 73155880.

THE CLERK: Yes.

MS. AVILES: Thank you.

THE COURT: Anything else right now?

MS. BARLOW: No, Your Honor.

MS. AVILES: Your Honor, I wasn't clear about the scope of the restraining order. Are you granting it as requested?

THE COURT: No. I took out paragraph number two, which is I believe the request for --

MS. BARLOW: Appointment of a forensic specialist.

THE COURT: Yes. We're not going to do that, at least not yet. If you want to brief that and put it before me, that's fine.

MS. AVILES: There is another issue in one. I know some of them are just about -- are retention of any records that might be within the definition, but there's also publishing. I think that squarely falls within a prior restraint.

THE COURT: That's part of my ruling, so that's going to remain.

MS. AVILES: Can I -- okay.

THE COURT: All right? Thank you very much. Appreciate the efforts.

MS. AVILES: Thank you, Your Honor.

MS. BARLOW: Thank you, Your Honor.

THE COURT: We're off the record.

(Adjournment)

STATE OF CALIFORNIA)
) ss.
COUNTY OF ORANGE)

I, Jay M. Bullard, CSR No. 3455, Official Court Reporter Pro Tempore, do hereby certify that the within and foregoing reporter's transcript, is a full, true, and correct transcript of my shorthand notes thereof, and a full, true, and correct statement of the testimony and proceedings had in said cause.

Dated: October 28, 2019

_____
Jay M. Bullard, CSR #3455

Official Court Reporter

Pro Tempore

PROOF OF SERVICE

I reside or work within in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1502 Foothill Blvd., Suite 103-140, La Verne, CA 91750.

On **October 31, 2019**, I served the foregoing documents described as **PETITION FOR ALTERNATIVE AND PEREMPTORY WRITS OF MANDAMUS, PROHIBITION, AND REVIEW MEMORANDUM IN SUPPORT OF PETITION; APPENDIX OF SUPPORTING EXHIBITS** on the parties in this action as listed in the attached service list by the following means:

Service List

Kimberley Hall Barlow
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3777 North Harbor Blvd.
Fullerton, CA 92835
Email: *khb@jones-mayer.com*
Phone: (714) 446-1400
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Honorable. Thomas A. Delaney
Judge, Dept C24
Orange County Superior Court
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Santa Ana, CA 92701
Phone: (657) 622–5224
Attorneys for Plaintiff CITY OF FULLERTON

Electronic Service

In accordance with Code of Civil Procedure sections 1010.6 and 1013, California Rules of Court, Rule 2.251, an order of the court, and/or an agreement of the parties, I caused the documents to be sent to the person at the email address listed below via email or via an electronic filing provider. After transmission, I did not receive, within a reasonable period of time, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: October 31, 2019 /s/Albert D. Aviles
Albert D. Aviles