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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**JONATHAN LEE COX**

and

**STANLEY EVAN COX,**

Defendants.

**Docket No. 23-CR-133-J**

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**Government's Notice of Intent to Offer Expert Testimony**

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The United States of America hereby submits its notice of intent to offer expert testimony. Fed. R. Crim. P. 16(a)(1)(G). The United States reserves the right to further supplement this notice. Fed. R. Crim. P. 16(a)(1)(G)(vi), (c).

***DUSTIN KIRSCH***

***Qualifications:*** Dustin Kirsch is an Investigator with the Wyoming Game & Fish Department. Investigator Kirsch conducted the Cellebrite dump of the Defendants' cellular devices in this matter. A curriculum vitae and/or resume detailing Investigator Kirsch's qualifications—

including past expert testimony and publications, if any—will be provided to this Court and counsel for the Defendants promptly after the document is made available to the government.

***Summary of Testimony:*** Investigator Kirsch will testify about his role in the investigation in this case and the opinions he has reached based on his investigation. Investigator Kirsch is expected to testify regarding information obtained from the Defendants' cellular telephone using specialized digital forensic acquisition, examination software, and tools. Investigator Kirsch may also provide foundation testimony to establish that the data extracted from the cellular telephone accurately reflects the contents of the cellular telephone. Investigator Kirsch may testify as to facts in his personal knowledge regarding assistance provided in the use of specialized hardware and software, including cellular telephone extraction software to extract data from the Defendants' cellular telephones. He is expected to provide lay testimony that the extraction hardware and software copies data from cellular telephones.

Investigator Kirsch may further testify regarding his investigation, preservation, and retrieval of digital information, cloud storage accounts, messaging applications, social media accounts, and email accounts as well as the cellular telephone seized from the Defendants. Investigator Kirsch will testify regarding the procedures he used to preserve and analyze the cellular telephone seized from the Defendants, and will testify to the opinions and conclusions he reached based on his investigation. Investigator Kirsch will provide percipient and opinion testimony as to the forensic download and extraction of digital information from the Defendants' cellular telephones seized during the investigation of this case. Investigator Kirsch will testify regarding the investigation, preservation, and retrieval of digital information from cellular telephones seized. Investigator Kirsch will testify regarding the procedures used to preserve the data contained on the seized digital devices, the process of extraction of the data from the devices

using specific software, and the analysis of the devices. Specifically, Investigator Kirsch will set forth the findings of the forensic examination of cellular telephone and the various files that were discovered during the examinations, and will render an opinion consistently with his report and other information that was provided discovery, including that the Defendants operated the cellular telephones.

*/s/ Signature Pending*  
**Investigator Aaron Kirsch**

**DATED** this 21st day of November 2023.

Respectfully submitted,

NICHOLAS VASSALLO  
United States Attorney

By:           */s/ Michael J. Elmore*            
MICHAEL J. ELMORE  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2023, the foregoing was electronically filed and thereby served on defense counsel via CM/ECF.

          */s/ Hunter J. Davila*            
For the United States Attorney's Office