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EXHIBIT A:
Order Granting
Summary Judgment
(June 18, 2019)

FILED
06-18-2019
CIRCUIT COURT
DANE COUNTY, WI
2018CV003122

DATE SIGNED: June 18, 2019

Electronically signed by Frank D Remington
Circuit Court Judge

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

LEONARD POZNER,
 Plaintiff

vs.

Case No. 18CV3122

JAMES FETZER,
MIKE PALECEK,
WRONGS WITHOUT WREMEDIES, LLC,
 Defendants.

Order Granting Plaintiff’s Motion For Summary Judgment

This Court having considered the following:

On April 30, 2019, Plaintiff filed a Motion for Summary Judgment and supporting materials (Docs. 101-106, 117-122), that Defendant Fetzer and Defendant Palecek defamed Plaintiff by publishing the following statements in the 2016 edition of NOBODY DIED AT SANDY HOOK:

- “Noah Pozner’s death certificate is a fake, which we have proven on a dozen or more grounds.”
- “[Mr. Pozner] sent her a death certificate, which turned out to be a fabrication.”
- “As many Sandy Hook researchers are aware, the very document Pozner circulated in 2014, with its inconsistent tones, fonts, and clear digital manipulation, was clearly a forgery.”

Plaintiff's Motion additionally sought Summary Judgment that Defendant Fetzer defamed Plaintiff by publishing the following statement from a 2018 blog post:

- "It [N.P.'s death certificate] turned out to be a fabrication, with the bottom half of a real death certificate and the top half of a fake, with no file number and the wrong estimated time of death at 11 AM, when 'officially' the shooting took place between 9:35-9:40 that morning."

Defendant Fetzer filed a Response and supporting materials (Docs. 176-184, 190-191, 193, 195-198) which Mr. Palecek sought to join (Docs. 210-212). Plaintiff filed a Reply (Doc. 206) on June 12, 2019.

Defendant Fetzer filed a Motion for Summary Judgment and supporting materials (Docs. 100, 136-137). Plaintiff filed a Response and supporting materials (Docs. 169-172) and Defendant Fetzer filed a Reply on June 12 (Doc. 207). The parties filed associated motions to strike certain evidence and responses thereto (Docs. 185-186 (Defendant Fetzer's motions), 202-205 (Plaintiff's motions)). The Court thereafter heard oral argument on June 17, 2019.

NOW IT IS HEREBY ORDERED that for the reasons stated on the record at the June 17, 2019 hearing:

Defendant Palecek's Verified Motion for Extension to File Response is denied;

Defendant Palecek's Response to Plaintiff's MSJ and Cross-Motion for Summary Judgment is denied;

Defendant Fetzer's Motion to Strike Green Affidavit is denied;

Defendant Fetzer's Motion to Strike Friedman and Sinelnikov Affidavits is denied;

Defendant Fetzer's Motion for Summary Judgment is denied; and

Plaintiff's Motion for Summary Judgment is granted. The amount of Mr. Pozner's damages remains at issue for trial.

Ordered on this 18th day of June, 2019.

EXHIBIT B:
Crime Scene Photo of
Leonard Pozner
(May 2, 2017)

THE GUARDIAN

Interview

Sandy Hook father Leonard Pozner on death threats: 'I never imagined I'd have to fight for my child's legacy'

Hadley Freeman

May 2, 2017

Noah was the youngest victim killed in the 2012 school massacre. His parent talks about dealing with the conspiracy theorists and hoaxers who have taunted him ever since.



Leonard Pozner with his son Noah who died at Sandy Hook in 2012.

Photograph: Courtesy Leonard Pozner

<https://www.theguardian.com/us-news/2017/may/02/sandy-hook-school-hoax-massacre-conspiracists-victim-father>

EXHIBIT C:
Drill L-366 on CT FEMA Schedule
(December 14, 2012)

10/2/2017

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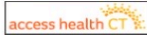
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- Disaster Recovery
- FirstNet
- Hazard Mitigation
- Interoperable Communications
- Public Information
- Legal
- Citizens Corps Advisory Council/CERT/MRC

State Offices: Early Release Late Openings/Closures



Event Search

Calendar: All Calendars

Event Title: FEMA L366

OK

Search Results

Date	Time	Event Title
1/18/2011	8 AM - 5 PM	FEMA / Water Environment Federation Water Sector Interdependencies Training January 18-19, 2011
11/17/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
11/27/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
12/3/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
12/6/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
12/14/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
12/17/2012	9 AM - 4 PM	FEMA L-366 Planning for the Needs of Children in Disasters
11/2/2015	1 PM - 5 PM	FEMA Courses: AWR-317 REP Core Concepts and MGT-445 REP Plan Review

Sandy Hook Elementary, 18 mi. away @9:35am

[Return to the Calendar](#)

10/2/2017

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- FirstNet
- Hazard Mitigation
- Interoperable Communications
- Public Information
- Legal
- Citizens Corps Advisory Council/CERT/MRC

Dec 14, 2012

FEMA L-366 Planning for the Needs of Children in Disasters

The goal of the course is to enable participants to improve their community's mitigation and emergency operations plan specifically regarding the needs of children. The course will provide them with the information needed to address the unique needs of children prior to, during and following disasters. It will also provide them guidance and direction on how to form coalitions and how to become advocates for the unique needs of children in all aspects of emergency management.

After completing this course, participants will be able to:

- Articulate the importance of providing for the needs of children in disasters in your community's current emergency management plan.
- Explain what is required to keep children safe in emergencies and why those needs are unique.
- Explain the assumptions, concept of operations, organization and assignment of responsibilities that address the unique needs of children prior to, during and following disasters.
- Explain the planning components necessary to address the unique needs of children prior to, during and following disasters
- Incorporate the unique needs of children in disasters into Emergency Operations Plans
- Identify stakeholders and organizations that can assist in preparing for the needs of children in disasters.
- Initiate steps to form coalitions and build teams that have a stake in keeping children safe in disasters

The target audience for this course is local and state emergency managers and planners, Child Services Agencies, NGO's, Child Care Providers, Schools, and Faith-based Organizations.

1. As of October 1, 2012 anyone applying for FEMA courses must obtain a FEMA Student Identification (SID) number. For more information and to obtain a SID go to: <https://crt.dhs.gov/femasid/>

You will need this number to complete the course application form (119-25-1) that will be filled out at the beginning of the class. FEMA certificates will be mailed to participants after completion of this course.

2. Class size is limited to 30. Please sign up as soon as possible to guarantee a spot in the class of your choice.

3. There are no prerequisites for this class.

4. There is no cost for the class and lunch is on your own.

Please watch this short video on how to setup an account.

<http://www.ct.gov/demhs/files/demhs/training/registration.html>

Location: 2800 Main Street, Bridgeport, CT
This event is 37 miles from you (06457).

9 AM - 4 PM

Contact: Christopher Ackley
Email: christopher.ackley@ct.gov
Phone: (203)-696-2640

5 of 40 seats still available

Last day to register: 12/13/2012

Sorry, you may not register for this event.

Input your zip code to calculate the distance to the event:

[Go Back](#)

[DEMHS Calendar of Events](#)

State Offices: Early Release
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BULLETIN



The image shows a Google Maps interface with a sidebar on the left and a main map area on the right. The sidebar contains the following information:

- Origin: 2800 Main St, Bridgeport, CT 06606
- Destination: 12 Dickenson Dr, Sandy Hook, CT 06482
- Buttons: Add destination, Leave now, OPTIONS
- Feature: Send directions to your phone
- Route 1: via CT-25 N (Fastest route, the usual traffic) - 37 min, 19.4 miles
- Route 2: via Main St - 42 min, 17.4 miles
- Route 3: via CT-59 N - 41 min, 20.1 miles

The main map area shows a blue route starting at 2800 Main Street in Bridgeport and ending at 12 Dickenson Drive in Sandy Hook. The route passes through Danbury, Bethel, Redding, and Milford. A satellite inset is visible in the bottom left of the map area. The bottom status bar includes the Google logo, map data (©2017 Google), location (United States), and a scale bar (2 mi).

EXHIBIT D:
Site Activation Call-down
Drill Exercise Plan
(Publishing Date 10/08/12)

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Mass Casualty Drill

Emergency Response For
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Site Activation Call-down Drill Exercise Plan

[MASS CASUALTY DRILL]

Exercise Date: 12/14/12

Publishing Date: 10/08/12

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FINAL

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PREFACE

National Preparedness is sponsored by FEMA and the Department of Homeland Security. This Exercise Plan was produced with input, advice, and assistance from the National Incident Management System (NIMS) exercise planning team, which followed the guidance set forth in the Federal Emergency Management Agency (FEMA), Homeland Security Exercise and Evaluation Program (HSEEP).

The Plan gives officials, observers, media personnel, and players from participating organizations the information necessary to observe or participate in an all hazards preparedness exercise focusing on participants' emergency response plans, policies, and procedures as they pertain to specific scenarios. The information in this document is current as of the date of publication, 10/08/2012, and is subject to change as dictated by the National Incident Management System exercise planning team.

The Preparation for Mass Casualty is a *classified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the **exclusive** use of exercise planners, controllers, and evaluators, but players may view other materials deemed necessary to their performance. The Exercise may be viewed by all exercise participants, *but the Controller and Evaluator (C/E) Handbook is a restricted document intended for controllers and evaluators only.*

All exercise participants should use appropriate guidelines to ensure the **proper control of information** within their areas of expertise and to protect this material in accordance with current jurisdictional directives. Public release of exercise materials to third parties is at the discretion of The Federal Emergency Management Agency and the Preparation for Mass Casualty exercise planning team.

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**Exercise Plan
Mass Casualty Drill****Emergency Response For
Mass Casualties Involving Children****HANDLING INSTRUCTIONS**

1. The title of this document is *Mass Casualty Drill Involving Children Exercise Plan (ExPlan)*.
2. The information gathered in this ExPlan is *For Official Use Only (FOUO)* and should be handled as sensitive information not to be disclosed. This document should be safeguarded, handled, transmitted, and stored in accordance with appropriate security directives. Reproduction of this document, in whole or in part, without prior approval from The Department of Homeland Security is prohibited.
3. At a minimum, the attached materials will be disseminated only on a need-to-know basis and when unattended, will be stored in a locked container or area offering sufficient protection against theft, compromise, inadvertent access, and unauthorized disclosure.
4. For more information, please consult the following points of contact (POCs):

Agency POC:

Tom Romano
Federal Emergency Management Agency
860-256-0844 (office)
thomas.romano@ct.gov

Exercise Director:

Not Available

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Exercise Plan
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Mass Casualties Involving Children**CHAPTER 1: GENERAL INFORMATION****Introduction**

The Preparation for Mass Casualty is a drill designed to establish a learning environment for players to exercise emergency response plans, policies, and procedures as they pertain to a mass casualty incident involving children. A drill is used to validate a single specific operations or function of a single agency/organization and can be used to practice/maintain skills.

This Exercise Plan (ExPlan) was produced at the direction of the Department of Homeland Security with the input, advice, and assistance of the Preparation for Mass Casualty planners.

Confidentiality

The Preparation for Mass Casualty is a *classified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the exclusive use of exercise planners, controllers, and evaluators, but players may view other materials deemed necessary to their performance. This ExPlan may be viewed by all exercise participants, *but the Controller and Evaluator (C/E) Handbook is a restricted document intended for controllers and evaluators only.*

All exercise participants should use appropriate guidelines to ensure the proper control of information within their areas of expertise and protect this material in accordance with current Department of Homeland Security directives. Public release of exercise materials to third parties is at the discretion of the Department of Homeland Security and the Federal Emergency Management Agency and the Preparation for Mass Casualty Planning Team.

Purpose

The purpose of this exercise is to evaluate player actions against current response plans and capabilities for a mass casualty incident response.

Target Capabilities

The National Planning Scenarios and the establishment of the National Preparedness Priorities have steered the focus of homeland security toward a capabilities-based planning approach. Capabilities-based planning focuses on planning under uncertainty, since the next danger or disaster can never be forecast with complete accuracy. Therefore, capabilities-based planning takes an all-hazards approach to planning and preparation which builds capabilities that can be applied to a wide variety of incidents. States and Urban Areas use capabilities-based planning to identify a baseline assessment of their homeland security efforts by comparing their current capabilities against the Target Capabilities List (TCL) and the critical tasks of the Universal Task List (UTL). This approach identifies gaps in current capabilities and focuses efforts on identifying and developing priority capabilities and tasks for the jurisdiction. These priority capabilities are articulated in the jurisdiction's homeland security strategy and Multi-Year Training and Exercise Plan, of which this exercise is a component of.

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The capabilities listed below have been selected by the Preparation for Mass Casualty planning team from the priority capabilities identified in the Federal Emergency Management Agency's Multi-Year Training and Exercise Plan. These capabilities provide the foundation for development of the exercise objectives and scenario, as the purpose of this exercise is to measure and validate performance of these capabilities and their associated critical tasks.

CORE CAPABILITY RESEARCH INITIATIVE

The *LLIS.gov* team strives to provide useful and pertinent information to the whole community. In order to deliver relevant lessons learned and innovative practices to our users, the *LLIS.gov* team is focusing its research on Core Capabilities, as defined in the [National Preparedness Goal](#). The *LLIS.gov* team uses the results of State Preparedness Reports (SPRs) to identify the capabilities states have self-assessed as both high-priority and low-proficiency.

The *LLIS.gov* team has already conducted research on [Mass Care Services](#), [Cybersecurity](#), and [Community Resilience](#), and will soon begin research on Housing. The goal of this research is to gather lessons learned, innovative practices, and resources from subject matter experts at all levels of government, NGOs, and the private sector and share them with the whole community. Click on the pages below to view the gathered resources, and please consider contributing your expertise.

List The Target Capabilities To Be Exercised:

- Mass Prophylaxis
- Mass Death of Children at a School by Firearms
- Suicide or Apprehension of Unknown Shooter
- Use of Media for Evaluation
- Use of Media for Information Distribution

Exercise Objectives

The Preparation for Mass Casualty exercise planning team selected objectives that focus on evaluating emergency response procedures, identifying areas for improvement, and achieving a collaborative attitude. This exercise will focus on the following objectives:

This is a list of sample objectives that apply to this exercise. Drills traditionally have 1 to 3 specific objectives.

Site Call-Down. Ability to contact and ensure facilities are available for emergency response functions.

1. Measure the time needed for the jurisdiction to contact owners or managers of Emergency Dispensing Sites during a mass casualty or incident involving children, in accordance with MOUs.

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**Exercise Plan
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2. Measure the time needed for the jurisdiction to receive access confirmation from owners or managers of Emergency Dispensing Sites during a mass casualty incident involving children, in accordance with MOUs.
3. Measure the percentage of sites that are available for use during a mass casualty incident involving children, in accordance with MOUs.

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CHAPTER 2: EXERCISE LOGISTICS

Exercise Summary

General

The Preparation for Mass Casualty is designed to establish a learning environment for players to exercise their plans and procedures for responding to an incident involving children as casualties. The Preparation for Mass Casualty will be conducted on 12/13/12, beginning at 8:00 am. Exercise play is scheduled until the Exercise Director/Controller determines that the exercise objectives have been met. Everyone must sign in with controller upon arrival.

Assumptions and Site Call-Down Instructions

This section contains the basic instructions on how to conduct this drill using both a manual and automated call-down system. These assumptions and instructions are derived from specific CDC guidance and should result in the necessary output for data collection.

For more details, please see: Chan, Edward, et al. Working Paper: Operational Assessments for SNS Readiness. Santa Monica: RAND Health, 2008.

Assumptions constitute the implied factual foundation for the exercise and, hence, are assumed to be present before the start of the exercise. The following general assumptions apply to the Preparation for Mass Casualty:

- *Site call-down list to be tested.* Jurisdictions have different lists of sites that would be called in an emergency. Example site call-down lists include EDSs and warehouse locations. Site call-down lists should be kept up-to-date, readily accessible, and usable. Jurisdictions should select one or more of these lists for use during this site call-down drill.
- *No-notice/no-availability drill.* To collect the best possible performance metrics, site call-down drills should not involve prior notice to those being called; however, **the drills need not require actually making the site available for use** by the health department.
- *No-notice.* Given that the purpose of the assessment is to estimate the percentage of the sites on the calling list that are reachable and available on a given day, we recommend the drill be conducted on a no-notice basis. At most, only the players who are required to initiate the site call-down procedure should be notified of the drill, but even they need not be warned beforehand. If using an automated calling system, only players who must activate the automated system need to be notified.
- *No site activation required.* To reduce the burden associated with gathering performance metrics, **sites on the call-down list are not required to actually make their site available for use** by the health department.
- **It is critical that this message is conveyed to the contacts receiving the site activation call.**

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- *Calling equipment.* Players should have access to all calling equipment and any call response monitoring technology that would be used during a real emergency in order to track the call responses received.
- *Automated calling system.* Jurisdictions using automated calling systems should collaborate with the provider of their calling system to perform the site call-down drill.
- *Manual calling system.* Jurisdictions using manual calling systems should run the drill using the same equipment and facilities that would be used during a real emergency. If this is not practical, the drill should be conducted using equipment and facilities that are as similar as possible.
- *Response method.* Jurisdictions should determine the method by which sites on the call-down list will acknowledge receipt of the call-down message and report their ability to make their site available.

Automated calling system

- *If an automated response function is available.* Sites on the call-down list should follow the instructions of the automated calling system to acknowledge receipt of the call-down message and report whether or not they are able to make their site available. Typically, persons called can enter a number on their phone after a prompt.
- *If an automated response function is not available.* Upon being called, sites on the call-down list should acknowledge receipt of the call-down message and report their ability to make their site available. The response can be in the form of an e-mail, phone call, or text message to a phone number specially designated for this purpose. Another option is to set up a call center to receive responses. Only responses received within a predetermined amount of time should be recorded for use in the performance metrics.

Manual calling system

- During successful phone calls, the caller can manually record receipt of the call-down message and the ability of each site on the call-down list to make their site available.
- *Protocol for non-respondent follow up.* For the purposes of this drill, the following non-responses indicate that the site on the call-down list has *not* acknowledged receipt of the call-down message:
 - Busy signal
 - No answer
 - Voicemail
 - Wrong person answering but correct person is unavailable
 - Wrong number.

Jurisdictions should determine the protocol for how callers or automated calling systems should handle non-responses.

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The following are the categories of participants involved in this exercise; for purposes of this call-down drill, participants include the following:

- **Players.** Players are the personnel who do the calling during the exercise. The players in the exercise should be the people who would do the calling in a real emergency.
- **Exercise Director/Controller/Evaluator.** This position has the overall responsibility for planning, coordinating, and overseeing all exercise functions. He/she monitors the status of play and the achievement of the exercise design objectives.

They declare when the drill starts and ends and manage the flow of the drill. This is the only participant who will provide information or direction to the players. However, because the drill focuses on the collection of time-based metrics, they should *not* intervene in timed activities while the drill is in progress.

He/she is responsible for timing the overall drill, gathering individual call data collection sheets, computing metrics, and taking notes to identify areas for improvement.

For an automated calling system. He/she should remain unobtrusive and not intervene with player action.

For a manual calling system. He/she should not intervene with player action. Ideally, the evaluator should be able to listen in on the calls that the players make

Exercise Tools**Controller and Evaluator Handbook**

The Preparation for Mass Casualty C/E Handbook is designed to help exercise controllers and evaluators conduct and evaluate an effective exercise. This handbook also enables controllers and evaluators to understand their roles and responsibilities in exercise execution and evaluation. Should a player, observer, or media representative find an unattended handbook, it should be provided to the nearest controller or evaluator.

Master Scenario Events List

The MSEL outlines benchmarks, as well as injects that drive exercise play. It also details realistic input to the exercise players as well as information expected to emanate from simulated organizations (i.e., those nonparticipating organizations, agencies, and individuals who would usually respond to the situation). For the purpose of this drill, the MSEL will not contain injects, but will instead only contain anticipated actions of the players.

Exercise Implementation**Exercise Play**

Exercise play will begin at 8:00 am on December 13th 2012. Play will proceed according to the events outlined in the MSEL, in accordance with established plans and procedures. The exercise

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will conclude upon the completion of operations and attainment of the exercise objectives, as determined by the Exercise Director/Controller. The exercise is expected to end at 11:59 pm on 12/13/12 and be evaluated on 12/14/12 as a real-time event.

Exercise Rules

The following are the general rules that govern exercise play:

- Real-world emergency actions take priority over exercise actions.
- Exercise participants will comply with real-world response procedures, unless otherwise directed by control staff.
- All communications (written, radio, telephone, etc.) made during the exercise will begin and end with the phrase, *“This is a drill.”*

Accident Reporting and Real Emergencies

Due to the nature of this drill, it is not anticipated that any accidents will occur, however, if an accident or real world emergency does occur, the participant is to immediately stop exercise play and attend to the accident or real-world emergency as necessary and notify the Exercise Director/Controller as soon as possible. If a real emergency occurs that affects the entire exercise, the exercise may be suspended or terminated at the discretion of the Exercise Director/Controller.

Communications Plan**Exercise Start, Suspension, and Termination Instructions**

The exercise is scheduled to run until the Exercise Director/Controller determines that the exercise objectives have been met.

All spoken and written communication will start and end with the statement, “THIS IS A DRILL.”

Player Communication

Players will use routine, in-place agency communication systems. Additional communication assets may be made available as the exercise progresses. The need to maintain capability for a real-world response may preclude the use of certain communication channels or systems that would usually be available for an actual emergency incident. In no instance will exercise communication interfere with real-world emergency communications.

See [Appendix B: Standard Script for Calls](#) for an outline of the recommended script for calling.

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Exercise Plan
Mass Casualty DrillEmergency Response For
Mass Casualties Involving Children**CHAPTER 3: PLAYER GUIDELINES****Player Instructions****Before the Exercise**

- Participants should be familiar with the appropriate emergency plans, procedures, and exercise support documents.

During the Exercise

- Respond to the exercise events and information as if the emergency were real, unless otherwise directed by an exercise controller.
- All exercise communication will begin and end with the phrase “**This is a drill.**” This is a precaution taken so anyone overhearing the conversation will not mistake the exercise play for a real-world emergency.

Data Collection

Data collection responsibilities depend on the calling system used. For an **Automated Calling System**, the drill **evaluator** is responsible for all data collection and analysis. Most Automated Calling Systems have the capacity to generate reports detailing the results of the call-down. The drill evaluator is responsible for extrapolating the following information from the report:

1. *Recording the drill information*, including date and location of drill, number of players, etc. (see Excel-based data collection spreadsheet).
2. *Recording the following process time stamps (to the hour and minute):*
 - a. When the automated system begins contacting sites on the call-down list
 - b. When the automated system completes contacting sites on the call-down list
 - c. When all sites have acknowledged receipt of the call-down message and reported their ability to make their site available by a pre-determined target time, or a predetermined amount of time has passed.
3. *Computing the performance metrics after the drill.*

For jurisdictions using a **Manual Calling System**, the players will record data that must be collected by the evaluators in the post-exercise period. The **players (callers)** are responsible for:

1. *Recording the following time stamps (to the hour and minute):*
 - a. When the player begins contacting sites on the call-down list
 - b. When the player completes contacting sites on the call-down list
2. *Recording for each site on the call-down list:*
 - a. Whether the site acknowledged receipt of the call-down message
 - b. Whether the site reported being able to make their site available by the target time

The drill **evaluator** is responsible for:

1. *Recording the drill information*, including date and location of drill, number of players, etc. (see Excel-based data collection spreadsheet).
2. *Gathering the data collection spreadsheets from each player.*

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3. Computing the performance metrics after the drill.

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Mass Casualties Involving Children**CHAPTER 4: EVALUATION AND POST-EXERCISE ACTIVITIES****Exercise Documentation**

The goal of the drill is to comprehensively exercise and evaluate the Department of Homeland Security and the Federal Emergency Management Agency's plans and capabilities as they pertain to a potential mass casualty incident involving children. After the exercise, data collected by controllers, evaluators, and players will be used to identify strengths and areas for improvement in the context of the exercise design objectives.

Exercise Evaluation Guides

DHS has developed Exercise Evaluation Guides (EEGs) that identify expected activities for evaluation, provide consistency across exercises, and link individual tasks to disciplines and expected outcomes. The EEGs selected by the Preparation for Mass Casualty trusted agents are contained in the evaluator materials packet along with the C/E Handbook. Supplemental evaluation material designed for the drill may also be used.

Data Collection Spreadsheet and Scoring Metrics

The Centers for Disease Control and Prevention (CDC) and the RAND Corporation have developed a data collection spreadsheet and scoring metrics computation spreadsheet, for assessing site call-down capability.

After Action Report

The AAR is the culmination of the Preparation for Mass Casualty. It is a written report outlining the strengths and areas for improvement identified during the exercise. The AAR will include the timeline, executive summary, scenario description, mission outcomes, and capability analysis. The AAR will be drafted by a core group of individuals from the exercise planning team.

After Action Conference and Improvement Plan

The improvement process represents the comprehensive, continuing preparedness effort of which the drill is a part. The lessons learned and recommendations from the AAR will be incorporated into an Improvement Plan (IP). The *After Action Conference* is a forum for jurisdiction officials to hear the results of the evaluation analysis, validate the findings and recommendations in the draft AAR, and begin development of the IP. The *IP* identifies how recommendations will be addressed, including what actions will be taken, who is responsible, and the timeline for completion. It is created by key stakeholders from the Preparation for Mass Casualty participating agency officials during the After Action Conference.

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APPENDIX A: PARTICIPATING AGENCIES

Table A.1 Participating Agencies

Participating Agencies	
Federal (if applicable)	
State (if applicable)	
[Jurisdiction A]	
[Jurisdiction B] (if applicable)	

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Mass Casualties Involving Children**APPENDIX B: STANDARD SCRIPT FOR CALLS**

Callers and automated calling systems should use a standard script to ensure accuracy and consistency of messages and to ensure that time estimates taken from the drill reflect the pace of activity in a true emergency.

The script should: **1)** clearly state that this is a drill; **2)** assess ability to make their site available (**by a hypothetical time**); and **3)** in the case of a calling tree, provide instructions for further calls.

The 'hypothetical time' should reflect a realistic approximation of the time needed to prepare a host facility for the receipt of response staff and supplies.

Sample Call-Down Script

- This is a site call-down drill being conducted by the Department of Homeland Security and the Federal Emergency Management Agency. Your site is on the Department of Homeland Security's list of facilities that may be used in an emergency. If this were a real emergency, you would be asked to make your site available for use by the Department of Homeland Security's health department.
- Again, *this is only a drill*. There is no need for you to make your site available as a result of this call.

EXHIBIT E:
Affidavit of Brian Davidson, P.I.
(October 28, 2022)

STATE OF TEXAS

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*
*

COUNTY OF HARRIS, TX

AFFIDAVIT

My name is Brian Davidson. I am a licensed Private Investigator in the State of Texas. My date of birth is 06/25/1973. My address is 8022 Bayside Dr. Beach City, TX 77523. My telephone number is 832 304 3577. Today's date is 10/28/2022. I make the following affidavit of my own free will. I have not been promised anything in exchange for completing this affidavit.

I wish to state the following:

I am a private investigator currently residing in the Houston, TX area. I am licensed by the Texas Department of Public Safety Private Security Board and my license number is A17936.

In March of 2022 I began studying the Connecticut State Police files related to the Sandy Hook School shooting which has been published online at <https://cspsandyhookreport.ct.gov/>. My main area of interest has been the primary scene photographs which were taken at the Sandy Hook Elementary school after the December 14th 2012 massacre. The photographs in the file were provided by the Connecticut Department of Emergency Services and Public Protection.

I was first attracted to the file when I was asked to do an analysis of a photograph that was taken at the scene shortly after the shooting. The peculiar thing that caught my interest about the photograph in question was how the photograph ended up first being used on a Hearst Media server shortly after the shooting even though it was an official crime scene

photograph taken by an official crime scene investigator. Why would a crime scene investigator on an open investigation provide photographs to the media?

The first thing I do when beginning an analysis is to study the metadata related to the crime scene photographs to make sure that the evidence is authentic and that it hasn't been tampered with in any way. To my dismay I found that all metadata had been stripped from ALL the evidence provided at this website maintained by the Connecticut State Police. After further research I found that the photographs originated from digital cameras that clearly had the capability of preserving the metadata. The lack of metadata was highly unusual and virtually guaranteed that the evidence provided to the public cannot be used as official material in a courtroom setting because the original images and documents have been modified by the deletion of the data. I have never encountered any actual case where photographs or original material was purposely stripped from the files. Therefore, I found myself in unusual territory in relation to this event. Again, the very fact that all metadata had been removed is highly unusual.

The cover letter for the public investigation and signed by Commissioner Reuben Bradford provided to the public states on page 2 the following:

CFS 1200704559 is the primary investigation, which has been conducted by the Western District Major Crime Squad (WDMCS) from Troop A in Southbury in conjunction with State's Attorney Stephen Sedensky III of the Judicial District of Danbury. They have been supported by WDMCS detectives from each Troop in the district, as well as by Major Crimes detectives from across the state, the Federal Bureau of Investigation, the Bureau of Alcohol, Tobacco, Firearms and Explosives, the U.S. Attorney's Office for the District of Connecticut, Newtown Police Department, and numerous other federal, state and local law enforcement agencies too numerous to list.

A17936 [27-10-2022, 16:56:35]

[chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://csp sandyhookrepor...

The letter goes on to state:

While the wide range of information contained in these reports is presumed to be public, there are many statutes and regulations at both the state and federal levels that either prohibit disclosure, or allow withholding, of certain subsets of information. Each redaction throughout the report is marked with a two-digit code which corresponds to the legal basis supporting it as noted on the attached index. While this coding system makes clear the foundation of each redaction, several types of information that have been withheld warrant additional explanation.

1. Throughout this report, the names and contextually identifying information of involved children have been withheld. This contextual information includes descriptions or images of children, their clothing and their belongings and references to their family members as examples. While the names of the deceased victims are well known, certain facts pertaining to the individual children are not, and the identities of surviving children are not generally known. Consistent with certain permissive exemptions of the Freedom of Information Act and the constitutional rights of crime victims we have chosen to withhold that information.

A17936 [27-10-2022, 16:58:36]
[chrome-extension://efaldnbnmnnibpcajpcglclefindmkaj/https://cpsandyhookrepor...]

In my experience, there is no statute which would warrant the stripping of metadata from original evidence prior to the publishing of this information. The fact that these documents cannot be verified is cause for concern to say the least. There are various theories related to the crime in question which may lead a serious crime researcher to believe that events did not take place as portrayed in the media. For the purposes of this affidavit, I am simply going to point out some examples of difficult scenarios related to the evidence.

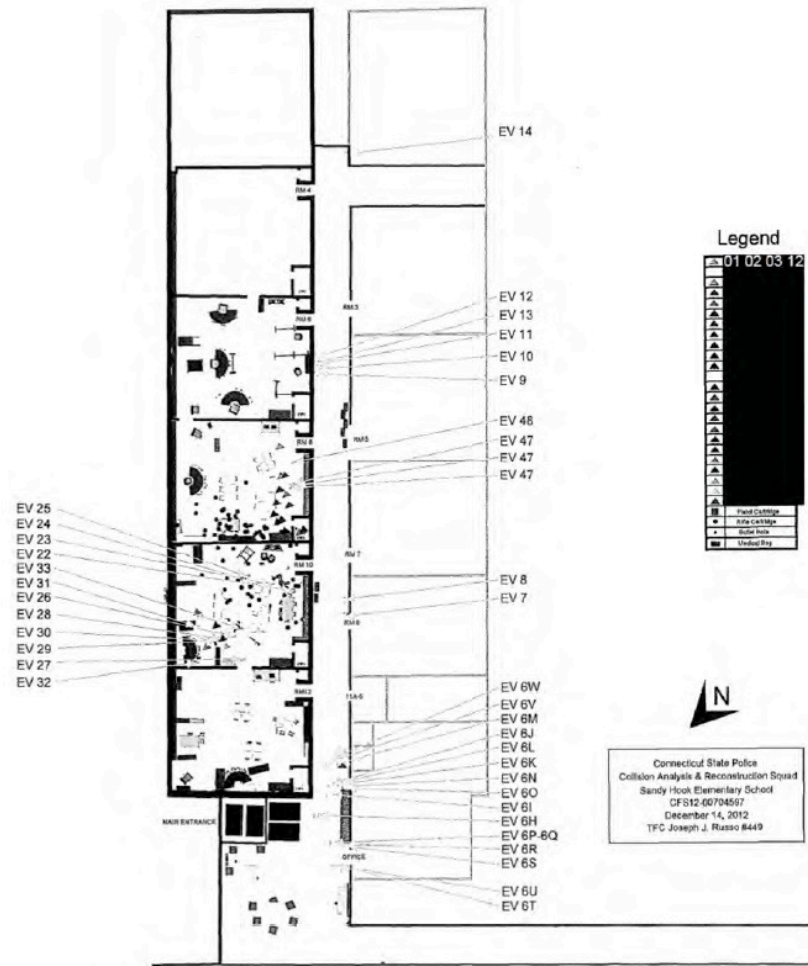
As a professional and independent researcher, I have studied the available crime scene photography and find many reasons to believe that the event did not take place as portrayed. In a mass casualty shooting blood spatter and pooling would be evident as it is described in reports, however the photographic evidence from the crime scene strains credibility. Therefore, I simply do not believe that the extraordinary lack of blood depicted at the crime scene is possible given the circumstances. I am not an expert in blood spatter or how it would pool under these circumstances. I do believe that as long as a human heart is pumping blood will continue to pump from

the wounds due to the fact that the heart is creating blood pressure in the body of the victim.

All exhibits related to this affidavit are contained in a public Google Drive file located at this url:

https://drive.google.com/drive/folders/1twYmluyTFRI_DJ15pEs9oqF8Eizaumpd?usp=sharing

Here is a visualization of the map of the crime scene as depicted in the provided reports. MapReport_ExhibitA.pdf page 5.



Above you will see a map of the inside of the school showing the main entrance and the relative position of the classrooms. It is my understanding that the shooter entered the main entrance of the school shooting, the shooter then turned to the left proceeding down the hallway passing room 12 on the left

and entering room 10. The shooter then proceeds to room 8 then returns to room 10 where a suicidal headwound results in death.

The search and seizure affidavit contains the following description of events: (SearchAndSeizureAffidavit_ExhibitB.pdf Page 4)

3. That on Friday, 12/14/12, at approximately 0935 hours, Newtown Police Department received a 911 call from a caller at the Sandy Hook Elementary School, 12 Dickinson Drive in Newtown, CT. The caller reported that an active shooting situation was occurring at the Sandy Hook Elementary School.
4. That as a result of the 911 call, numerous law enforcement personnel including members from the Newtown Police Department and the Connecticut State Police responded to Sandy Hook Elementary School, in Newtown. Upon arrival, law enforcement personnel conducted a search of the interior and exterior of the school. Investigators located CT registration 872YEO, a 2010, black colored Honda Civic unoccupied and parked in the fire lane directly in front of the school. A shotgun was noted in plain view to be in the interior of the vehicle. The registered owner for the Honda Civic is Nancy Lanza, DOB 09/06/60, 36 Yogananda Street in Sandy Hook, CT.
5. That as investigators entered the school numerous school children and school personnel were located deceased from apparent gunshot wounds in the first three classrooms located off the main hallway, adjacent to the school's front entrance. That investigators also located a teenaged white male dressed in military style clothing, wearing a bullet proof vest lying deceased on the floor in the middle classroom. That the deceased male was in possession of several handguns as well as a military style assault weapon. That the deceased male has been tentatively identified as Adam Lanza, DOB 04/22/92, who resides at 36 Yogananda Street in Sandy Hook, CT.

The Scene Report contains the following statement (SceneReport_ExhibitC.pdf Page 4)

At the conclusion of the scene processing it was known that eighteen (18) children, four (4) teachers and two (2) administrators were deceased within the school and two (2) children were pronounced deceased at Danbury Hospital. Two (2) other adults (teacher/administrator) were injured and treated at nearby hospitals where they survived their injuries. Also known is that a total of one hundred and fifty four (154) expended 5.56 mm (.223 caliber) bullet casings were recovered from the school to include the patio area adjacent to the front lobby of the school. Two (2) expended 10mm bullet casings were recovered from within the school. Three (3) firearms were recovered from within the school to include a semi-automatic "Bushmaster" .223 caliber rifle, a Glock 10mm pistol and a Sig Sauer P226, 9 mm pistol. Additionally, three hundred and fifty three (353) live rounds of assorted ammunition were also recovered within the school. [NOTE: this information does not include evidence seized by CDMC Van Squad which begins with Exhibit #500].

The same report contains this statement:

On Friday 12/14/2012, into the early morning hours of Saturday 12/15/2012, members of the WDMC Van Squad and the OCME began the processing efforts to document, identify and remove the bodies of the twenty four (24) victims and one (1) shooter from within the school.

The victims were first identified by assigning them a numeric number 3 thru 26. 01 02 03 12 [REDACTED] and number 27 was assigned to the shooter). Then an assigned "OCME case number" was written on a tag with their previously assigned numeric and was placed on each victim. Photographic and written scene documentation was completed capturing clothing worn, location of victim, and assigned "OCME number" with identifying photographs of the victim. (NOTE: Prior to processing, the victims were observed to have "triage tags" previously laid upon their bodies by EMS personnel denoting their deceased status).

Once documentation was complete, the victims were placed into a body bag with their associated OCME case number written on the bag while their OCME tag was left on the ground in the place the victim was found. Each victim was carried out of the school and into a large military-style portable tent located within the north parking lot of the school in close proximity to the front lobby. Each victim was then processed by the OCME in an effort to make a positive identification of each victim, using school photographs and clothing descriptions provided by the parents of the children yet to be accounted for. On Saturday, 12/15/2012, all of the victims were transported from the scene to the OCME in Farmington, Connecticut, for an autopsy at a later time.

Page 10 contains this statement

Only three (3) areas had damage consistent with having been forcibly entered: (1) The front (north) window adjacent to the west side of the front lobby doors was broken with a large hole visible. (2) Classroom #3 interior door between Classroom #3 and Classroom #5 was observed to be forcibly entered to gain access into Classroom #5 with the words "Breach" written on the door. Classroom #5 hallway door was locked and not breached. (3) The north window on the south-east exterior side door was reportedly breached by police to gain entry through this door from this side of the building. This door was located between classroom #46 and classroom #48 and provided access into the east hallway. Police reports indicate that this door was breached by Newtown Police Officer Seabrook. (Refer to Det. Lukienchuk's Nexgen Report #29085).

Page 11 contains this statement