



1 Group was managed by Markus Kuhn when Markus was a student at the University of Erlangen  
2 in Germany. While Chris was living in Germany , he and I exchanged email messages and  
3 exchanged software concerning D2MAC-Eurocrypt (Canal+/TV1000) and Videocrypt  
4 (Sky/Filmnet) systems. Chris went back to the United States but we continued our email  
5 correspondence. Chris began to study the Videoguard system (version P1) utilized by DirecTV  
6 in the United States to protect its satellite TV signals. Chris asked me for some source code I  
7 had written concerning the DES encryption algorithm and associated tables.

8           3.       In 1997 Chris contacted me and requested that I put him in contact with  
9 people who were able to analyze smart cards. I introduced Chris to Vesselin Ivanov Nedeltchev  
10 (“Vesco”) and gave Vesco’s phone number to Chris. Vesco is an engineer I had met in Geneva  
11 who had studied smart cards and their associated security systems. I also met Vesco in mid-2001  
12 in Geneva when he came to see me specifically to discuss questions related to the security  
13 encryption of access control systems and at that time I understood Vesco was working directly  
14 for Reuven Hasak of NDS.

15           4.       Very shortly after its publication on the DR7 website, I became aware that  
16 the Canal+ smart card code was available for downloading from the DR7 website. I downloaded  
17 that smart card code from the DR7 website and examined that binary code and the text files  
18 included with it. The text document indicated that the code associated with the EEPROM had  
19 been lost during the extraction process but indicated that the rest of the data from the user-ROM  
20 was included in the file. I examined that binary code and determined that the code present at the  
21 2000 address was missing.

22           5.       Knowing that Chris Tarnovsky knew Al Menart because I had introduced  
23 the two of them in 1996 and knowing that Al Menart was the Webmaster of DR7, I asked Chris  
24 Tarnovsky if he could obtain the [missing] code present at the 2000 address from Al Menart. By  
25 an email exchange from Chris Tarnovsky, Chris sent me an 8kb binary file that he claimed  
26 contained the requested code extracted from the Canal+ smart card. Attached as Exhibit A to  
27 this declaration is a copy of the email I received from Chris Tarnovsky (using the alias of Arthur  
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