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SUDO SECURITY GROUP, INC.

8
9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF SAN FRANCISCO

11 6x7 NETWORKS, LLC, a Delaware limited
12 liability company,

13 Plaintiff,

14 v.

15 SUDO SECURITY GROUP, INC., a Delaware
corporation doing business as Guardian; STEVE
16 RUSSELL, an individual; SEAN SNYDER, an
individual; and DOES 1 through 100 inclusive,

17 Defendants.

18 SUDO SECURITY GROUP, INC., a Delaware
19 corporation,

20 Cross-Complainant,

21 v.

22 6x7 NETWORKS, LLC, a Delaware limited
liability company, and BENJAMIN CANNON,
23 an individual,

24 Cross-Defendants.

Case No. CGC-19-581498

**DECLARATION OF ANDREW WATTERS
REGARDING 6X7 NETWORKS, LLC AND
BENJAMIN CANNON'S MOTION TO
QUASH DEPOSITION SUBPOENA TO
ANDREW WATTERS FOR PRODUCTION
OF DOCUMENTS AND/OR FOR
PROTECTIVE ORDER**

Date: February 26, 2021
Time: 9:00 a.m.
Dept: 301

Action Filed: December 13, 2019
Trial Date: None Set

1 I, Andrew Watters, declare:

2 1. I am an individual above the age of 18 years of age and a non-party to the above action. I
3 have personal knowledge of the following facts and if called as witness, I would and could competently
4 testify to the truth of these facts.

5 2. This declaration does not respond to most of Ms. Cannon's irrelevant comments and
6 lamentations, but there is one thing I do need to correct due to her blatantly false testimony.

7 3. I did not "almost immediately" render legal services to Ms. Cannon or 6x7 after
8 "approaching" them as a service provider in Spring 2018. Ms. Cannon had posted an ad on Craigslist in
9 Spring 2018 soliciting telecom customers and asking for help in finding other customers for her
10 supposed datacenter. I needed a cabinet in a datacenter for a software project, and Ms. Cannon's
11 representations made it sound like a good deal both as a customer and a finder of business opportunities.
12 This ended up being absolutely a fraud and a scam because Ms. Cannon *had not even occupied the*
13 *building yet*, which it turns out *she was squatting in*. So the datacenter did not even exist, but she was
14 representing that she had the datacenter and that it had numerous features that were desirable to me.

15 4. It was only through Ms. Cannon's fraud that I ever became connected with this company
16 in the first place, which was *essentially solely as a customer* until November 2019. At that point, I
17 signed a sales agreement to help find customers for 6x7 in return for a commission. Ms. Cannon and I
18 did have occasional conversations from 2018 to 2019 about random technical subjects such as research
19 and development, inventions, and similar non-legal topics. These conversations occurred whenever Ms.
20 Cannon had the urge to call me, which was rare because she does not normally return calls or voicemails
21 when people want to talk to her. I did not render legal advice to Ms. Cannon or 6x7 until *June 2020*,
22 although I did assist Ms. Cannon with her false SAM registration in late May 2020 (I did not know it
23 was false at the time). I was careful to note in these conversations and the one May 2020 meeting that I
24 was not yet Ms. Cannon's or the company's attorney, nor would I ever agree to do any legal work pro
25 bono for a telecom company. I later discovered that Ms. Cannon already had a lawyer, in any case—
26 Marc Indeglia, Esq. (6x7's attorney on the complaint in this case). These informal conversations with
27 Ms. Cannon continued sporadically until June 1, 2020, when I did agree to an employment relationship
28

1 with 6x7 as Chief Legal Officer, which was a 42-day long position that ended with my resignation due
2 to the approximately \$15,000 in wage theft by 6x7 and Ms. Cannon and her other bad behavior.

3 5. I had executed a channel sales agreement with 6x7 Networks, LLC on or about
4 November 17, 2019. My arrangement as a sales representative concluded on July 12, 2020 along with
5 the legal work. The sales agreement was not an employment relationship, rather I was an independent
6 contractor, and Ms. Cannon steadfastly denied that she ever had any employees in any case.

7 6. I became employed as counsel to 6x7 Networks, LLC on June 2, 2020, retroactive to
8 June 1, 2020. My employment as counsel to 6x7 Networks, LLC concluded on July 12, 2020 with my
9 resignation. I was paid nothing for my work, and Ms. Cannon continued to fraudulently charge my
10 credit card for datacenter space even after I canceled those services due to her fraud.


11 7. My blog post about 6x7 -- <https://www.andrewwatters.com/6x7/> -- has resulted in
12 numerous contacts from the telecom community and the San Francisco club scene thanking me for
13 exposing Ms. Cannon as a liar, cheat, and fraud. I was scratching the surface with my online post, and I
14 have since connected with other victims of Ms. Cannon's fraud.

15 8. Other than the foregoing, I had no employment relationship with 6x7 Networks, LLC at
16 any time or in any other capacity. In June/July 2020, I agreed to handle two ancillary personal matters
17 of Ms. Cannon that furthered the interests of the LLC, such as a settlement with a bond company and a
18 personal health-related matter, but that was the extent of my legal work. Most of the work of the day-to-
19 day part-time position was sales-related, such as nearly daily conference calls where I spoke about my
20 leads and reported on business opportunities, as did the other employees.

21 9. I am a 15-year lawyer with 18 trials and 3 JAMS arbitrations, for a total of 21
22 proceedings litigated to judgment. In my opinion, the information in my possession will likely result in
23 the resolution of this action by way of summary judgment in favor of Defendant. The information is
24 critical to Defendant's defenses, and I've previously complained to 6x7's defense counsel on the cross
25 complaint that they are enabling Ms. Cannon's shamelessly fraudulent conduct as well as her crimes,
26 including but not limited to wire fraud, theft, wage theft, and major fraud against the United States. This
27 is a case that cries out for a resolution, and the documents that 6x7 is trying to suppress are critical to
28

1 that resolution. I would propose a third party referee to review the legal file to see what if anything is
2 privileged; I don't think the non-legal portion of the file is privileged at all, or at least to the extent
3 requiring the whole subpoena to be quashed. But of course I will comply with whatever the Court
4 orders me to do.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing is
6 true and correct. Executed on February 11, 2021, at San Mateo, California.

7 

8 _____
9 Andrew Watters

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