

NORTH CAROLINA  
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
19 CVS 8163

STEVEN MCRAE, )  
)  
Plaintiff, )  
)  
v. )  
)  
KYLE RUSSELL CURTIS, )  
)  
Defendant. )  
)  
)

**DECLARATION OF MEGAN JOYCE**

I, Megan Joyce, being duly sworn, state as follows:

1. I am over the age of 18 and am competent to make this declaration.
2. I am employed as a legal assistant at Revolution Law Group.
3. I understand that the Defendant has submitted certain redacted credit card statements in this case as proof of address.
4. I was asked to review those credit card statements, specifically the bar code above the mailing address on each statement.
5. I researched the barcodes on the United States Postal Service website. Specifically, the USPS defines the Intelligent Mail Barcode as “a 65-bar Postal Service™ barcode used to sort and track letters and flats. It allows mailers to use a single barcode to participate in multiple Postal Service programs simultaneously, expands mailers’ ability to track individual mailpieces, and provides greater mail stream visibility.” This definition can be found here: <https://postalpro.usps.com/mailing/intelligent-mail-barcode>.
6. The USPS website has a barcode Decoder/Encoder service that allows the user to input the 65-digit barcode into the decoder, which will translate the information contained in the

barcode. The Decoder/Encoder can be found at this link: <https://postalpro.usps.com/ppro-tools/encoder-decoder>.

7. I examined the two credit card statements submitted by the Defendant. These were filed twice by Defendant: ECF No. 20 at 13-14, and ECF 31.1 at 11-12. Copies of the two statements are attached as Exhibit A.

8. Using the decoder on the USPS website, I was able to enter the 65-character barcode string and have it decoded. Printouts from the website after the barcodes were entered, including the barcode, the barcode character string, and the decoded information, are attached as Exhibit B.

9. As shown in Exhibit B, the two barcodes correspond to a Delivery Point Zip Code of 27313, which does not match the Zip Code of 28263 printed in the address field.

10. Zip Code 27313 is the zip code for Pleasant Garden, North Carolina.

11. Zip Code 27313 is also the zip code that was used when the summons and complaint were sent by certified mail. (ECF No. 7.)

12. In addition, when studying the address on the statements in Exhibit A, it appears to be in two different fonts. The name is printed in all capital letters in one font, while the address is in title case letters in a different font.

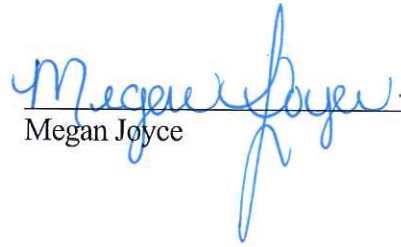
a. The “C” in Curtis does not match the “C” in Charlotte.

b. The “R” in Curtis does not match the “R” in Road.

13. It appears from these facts that the statements attached as Exhibit A were altered.

Pursuant to Emergency Directive 5, I affirm, under penalties for perjury, that the foregoing representations are true.

This the 8<sup>th</sup> day of September, 2020

  
Megan Joyce

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed with the North Carolina Business Court through its electronic filing system, which will cause a copy to be served electronically on all counsel of record listed below:

Scottie Forbes Lee  
ELLIS & WINTERS LLP  
PO Box 2752  
Greensboro, NC 27402  
*Attorney for Defendant*

This the 9th day of September, 2020.

**REVOLUTION LAW GROUP**

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