

User:

Client:

Search: Criminal Party Search Name google All Courts Page: 1 sort: cs_date_filed

Party Name	Court	Case	Date Filed	Date Closed
1 Google HTC Black Cell Phone, S/N: HT9CXP806843 (dft)	casdce	<u>3:2013-mj-01535</u>	04/18/2013	04/18/2013
2 Google Inc. Email Account of Grannpaz11@gmail.com (dft)	mddce	<u>1:2013-mj-00609</u>	04/11/2013	
		6:2013-mj-06059	03/19/2013	06/04/2013
4 Google, Inc., email account zhoujielun1990@gmail.com (dft)	mddce	<u>8:2013-mj-00326</u>	03/18/2013	
5 Google, Inc., email account RESQ78@GMAIL.COM (dft)	mddce	<u>8:2013-mj-00327</u>	03/18/2013	
6 Google accounts jizzdoner at gmail.com and user name Poppy Seed (dft)		<u>3:2013-mj-00912</u>	03/07/2013	03/07/2013
7 Google Gmail (dft)			02/14/2013	06/11/2013
8 Google Account hspspf@gmail.com (dft)		<u>1:2013-mj-00015</u>	02/13/2013	03/07/2013
9 Google Email Accounts (dft)			12/20/2012	
10 Google account jizzdoner at gmail.com (dft)			12/03/2012	12/03/2012
11 Google user name Poppy Seed (dft)			12/03/2012	12/03/2012
12 Google, Inc., Custodian of Records, 1600 Amphitheatre Parkway, Mountain View, CA 94043 (dft)	caedce	<u>1:2012-sw-00345</u>	11/20/2012	12/17/2012
13 Google, Inc. (dft)		6:2012-mj-06218	11/14/2012	01/29/2013
14 Google, Inc. (dft)		<u>6:2012-mj-06221</u>	11/14/2012	
15 Google Account Name mikemartin80@gmail.com (dft)	wawdce	2 <u>3:2012-mj-05182</u>	10/23/2012	03/20/2013
16 GOOGLE ACCOUNT: BUNNY0977@GMAIL.COM (dft)		2:2012-mj-01263	08/29/2012	
17 Google Inc. 1600 Amphitheatre Parkway Mountain View, California 94043 (dft)	caedce	<u>2:2012-sw-00449</u>	08/16/2012	
 18 Google, Inc. (mov) 19 Google, Inc., located at 1600 Ampitheatre Parkway, Mountain View, CA (dft) 		8:2012-cr-00319 1:2012-mj-00462	08/07/2012 06/29/2012	02/25/2013 10/09/2012



User:

Client:

Search: Criminal Party Search Name google All Courts Page: 2 sort: cs_date_filed

Party Name	Court	Case	Date Filed	Date Closed
	court	Case	Date Flied	Date Closed
55 Google, Inc. (dft)	tradce	1:2011-mj-00486	06/29/2011	10/04/2012
56 Google (dft)	nhdce	1:2011-mj-00043	06/09/2011	06/23/2012
57 Google Account (dft)		1:2011-mj-00376	05/18/2011	12/06/2011
58 Google, Inc. (ip)	ridce	1:2011-cr-00082	05/11/2011	01/16/2013
59 Google, Inc., 1600 Amphitheatre			04/12/2011	04/28/2011
Parkway, Mountain View, CA 94043 (dft)				
60 Google Inc. (dft)	txwdce	1:2011-mj-00206	03/21/2011	12/06/2011
61 Google, Inc. (dft)	codce	1:2011-sw-05039	01/27/2011	02/09/2011
62 Google Inc (ip)	wawdce	2:2010-cr-00328	11/03/2010	06/22/2012
63 Google Inc (ip)	wawdce	2:2010-cr-00328	11/03/2010	02/10/2012
64 Google Inc (ip)	wawdce	2:2010-cr-00328	11/03/2010	
65 Google 1600 Ampitheatre	mddce	1:2010-mj-02641	08/05/2010	
Parkway Mountain View, CA				
94043 for information and				
records pertaining to email accounts				
aboveaverageskater@gmail.com	2			
and Lavishlifeent77@gmail.com	,			
(dft)				
66 Google, Inc. (dft)	codce	1:2010-sw-05239	05/20/2010	06/17/2010
67 Google Inc. (intpp)	ordce	3:2010-cr-00196	05/18/2010	10/26/2011
68 Google Inc. (intpp)	ordce	3:2010-cr-00196	05/18/2010	08/22/2012
69 Google Inc. (intpp)	ordce	<u>3:2010-cr-00196</u>	05/18/2010	02/06/2013
70 Google Inc. (intpp)	ordce	3:2010-cr-00196	05/18/2010	02/06/2013
71 Google Inc. (intpp)	ordce	3:2010-cr-00196	05/18/2010	02/06/2013
72 Google, Inc. (dft)		<u>1:2010-mj-00355</u>	04/30/2010	04/26/2013
73 Google, Inc. (dft)	codce	<u>1:2010-sw-05163</u>	04/05/2010	04/05/2011
74 GOOGLE, 1600 Amphitheatre	mddce	<u>1:2010-mj-00384</u>	02/01/2010	
Parkway, Mountain View, CA 94043, for information and				
records pertaining to email				
account rickjank@gmail.com (dft)			
75 Google Account (dft)		2:2010-mj-00036	01/29/2010	03/15/2010
76 Google Legal Investigations	casdce	2:2010-mj-08078	01/25/2010	02/18/2010
Support, GMail (dft)				
77 Google Legal Investigations	ncwdce	1:2010-mj-00003	01/25/2010	01/26/2010
Support (dft)				
78 Google Legal Investigations Support (dft)	ncwdce	<u>3:2009-mj-00295</u>	12/09/2009	12/29/2009
79 Google, Incorporated, One 1600		1:2009-mj-00111	11/19/2009	11/19/2009
Amphitheatre Parkway, Mountain				
View, California, 94043 (dft)		4.0000	44400000	04/00/00/00
80 Google, Inc. (dft)		<u>1:2009-mj-00097</u>	11/10/2009	01/20/2010
81 Google, Inc. (dft)	casoce	<u>3:2009-mj-02855</u>	09/28/2009	10/05/2009



User:

Client:

Search: Criminal Party Search Name google All Courts Page: 3 sort: cs_date_filed

Party Name	<u>Court</u>	Case	Date Filed	Date Closed
109 Google Gmail Email Account kollegafor at gmail.com (dft)	casdce	<u>3:2007-mj-02029</u>	08/23/2007	08/23/2007
110 GOOGLE email account (dft)	ncwdce	<u>3:2007-mj-00128</u>	06/26/2007	
111 Google, Inc. (dft) 112 GOOGLE, INC. 1600 AMPHITHEATER PARKWAY BUILDING 47 MOUNTAIN VIEW, CA 94043 (dft)	codce dcdce	<u>1:2006-sw-05146</u> <u>1:2006-mj-00290</u>	09/06/2006 06/22/2006	10/03/2006
 113 Google, Inc. (dft) 114 Google Mail (dft) 115 Google/Gmail 1600 Amphitheater Parkway, Mountain View, CA 94043 (dft) 	txndce	3:2006-mj-01185 4:2005-mj-00189 1:2005-sw-00228	06/21/2006 09/28/2005 08/10/2005	07/19/2006 09/28/2005
116 Google (dft) 117 Google Hello Account (dft) 118 GOOGLE INC. 1600 AMPHITHEATRE PARKWAY MOUNTAIN VIEW, CALIFORNIA (dft)	wawdce	5:2005-cr-00322 2:2005-mj-00295 2:2005-mj-00223	07/20/2005 06/13/2005 02/25/2005	05/18/2007 06/23/2005
119 GOOGLE INC. 1600 AMPHITHEATRE PARKWAY MOUNTAIN VIEW, CALIFORNIA (dft)	paedce	2:2005-mj-00032	01/12/2005	

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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AUSA Freitas

Crim. No. 13. 3:

LOGGED

IN THE MATTER OF THE SEARCH OF THE UNITED STATES OF AMERICA) FOR A SEARCH WARRANT FOR THE) **GOOGLE, INC. ACCOUNT** ZHOUJIELUN1990@GMAIL.COM

AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT

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)

I, Douglas Macfarlane, your Affiant, being duly sworn, depose and hereby state that I am a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

BACKGROUND OF AFFIANT

1. 1 am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and have been so employed since April, 1996. 1 am currently assigned to the Major Case Coordination Unit ("MCCU"), Violent Crimes Against Children Section, FBI in Linthicum, Maryland. As such, I am currently assigned to investigate, among other things, crimes relating to the online, sexual exploitation of children including the trafficking and possession of child pornography. The MCCU is responsible for enforcing federal criminal statutes involving the sexual exploitation of children under Title 18, United States Code, Chapters 110 and 109A.

2. As a SA of the FBI, I have received specialized training in the investigation of child pornography and the sexual exploitation of children. I have observed and reviewed numerous examples of child pornography in various media formats, including computer-based formats. I have received particularized training in the investigation of computer-related crimes, Usenet, peer-to-peer computer networking, web-based bulletin boards and online (i.e. Internet-

based) crimes against children.

3. This affidavit is made in support of applications for a search warrant for information associated with a certain account that is stored at a premises owned, maintained, controlled, or operated by Google Inc., an electronic communications / Internet service provider headquartered at 1600 Amphitheatre Parkway, Mountain View, California 94043. The information to be searched is described in the following paragraphs and in Attachment B. This affidavit is made in support of an application for a search warrant under Title 18, U.S.C. § 2252A (use of a computer in or affecting interstate commerce to possess, receive, or distribute child pornography), to require Google Inc. to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the electronic account of zhoujielun1990@gmail.com, more particularly described in Attachment A.

4. This affidavit is requesting authority to search the electronic account described in Attachment A and seize all items listed in Attachment B as instrumentalities, fruits, or evidence of crime. Electronic accounts such as those maintained by Google Inc. can contain stored electronic information including previously saved email conversations and instant message conversations along with any data files attached to these saved communications.

5. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause to believe that evidence, fruits, or instrumentalities of the violations of Title 18, U.S.C. § 2252A including, but not limited to, the items described on Attachment B, which is attached hereto and incorporated herein by reference, are presently located at the premises described on Attachment A, which is

also attached hereto and incorporated herein by reference.

STATUTORY AUTHORITY

6. This investigation concerns alleged violations of Title 18, U.S.C. § 2252A:

a. 18 U.S.C. § 2252A prohibits a person from knowingly transporting, receiving, distributing, reproducing for distribution, and possessing any child pornography, as defined in 18 U.S.C. §2256(8), when such child pornography was either mailed or shipped or transported in interstate or foreign commerce by any means, or in or affecting interstate or foreign commerce by any means, including by computer, or when such child pornography was produced using materials that had traveled in interstate or foreign commerce.

PROBABLE CAUSE

7. In or about October 2012, the MCCU received information from the Taiwan Police regarding the child pornography website, www.zhenyouge.com. Your Affiant subsequently reviewed this information which included screen shots of the website taken by the Taiwan Police and learned the following:

(a) The website www.zhenyouge.com was a message board type of website where users can post messages for other users to view, similar to an online bulletin board. Users can also attach image files to the messages they post.

(b) The website was written almost entirely in the Chinese language. On the main page of the website were Chinese characters on the top left side of the screen that the Taiwan Police had translated to mean "the court to appreciate child pornography."

(c) There were other sections of the message board that were labeled (as

translated) "Picture of young girls," "Video of young girls," "Picture of young girls," and "Video of young boys." For both the boys and girls picture sections, there were instructions written in Chinese as to the rules of the section including

(as translated) a statement that the ages of the pictures posted to these sections had depict children between the ages of 5 to 14 years old.

(d) Users needed to pay in order to access the child pornography on the website. The website instructs users to first create a free screen name. Next, the user is instructed to purchase a Chinese prepaid phone card from separate websites and then provide that phone card information to the administrators of the www.zhenyouge.com website. Once the Taiwan Police, while acting in an undercover capacity, followed these instructions, they were able to access the child pornography.

(e) The Taiwan Police had conducted internet record checks and found that the website was hosted on a server located in Los Angeles, California.

8. From November 1 to November 8, 2012, while acting in an undercover capacity, your Affiant logged onto the Internet from the FBI office in Linthicum, Maryland, and visited the website www.zhenyouge.com. After creating a user name, your Affiant viewed the same sections with the same headings as provided in the screenshots by the Taiwan Police.

9. Your Affiant followed the instructions and purchased a "Shen Zhou" phone card from a separate website. After providing this information to the administrator of the www.zhenyouge.com website, your Affiant observed that his profile now displayed the letters "VIP" on it. Your Affiant was also provided access to view and download images and videos of child pornography.

10. On November 5, 2012, your Affiant viewed a post made by a user with the name

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"es54" dated September 18, 2012. Attached to the post were several images of child pornography including one image file with a file name of "034149kv9dxsdijs741xi.jpg." This picture file depicted a pre-pubescent Asian female performing oral sex on an adult male.

11. On November 6, 2012, your Affiant viewed a post made by a user with the name "cjh180" dated October 11, 2012. Attached to the post were several images of child pornography including one picture with a file name of "115952vvvzhmptq3st0q3h.jpg." This file was an image depicting a close-up view of the penis of a pre-pubescent boy with adult hands touching it.

12. In the videos sections of the website, no actual video files were attached to the message posts. Instead, links to another website, www.rayfile.com, were posted. Users were instructed to use the links to download child pornography from www.rayfile.com.

13. On November 7, 2012, your Affiant viewed a post made by a user with the name "zhenximeitian" dated September, 19, 2012. Attached to the post was a link to www.rayfile.com. After visiting that website, your Affiant downloaded a video using the download link. The video was titled "unknown.wmv" and depicted a pre-pubescent Asian female performing oral sex on an adult male.

14. On November 8, 2012, your Affiant viewed a post made by a user with the name "ganyjs218" dated September, 15, 2012. Attached to the post was a link to www.rayfile.com.
Your Affiant accessed the link and downloaded a video file. The video was titled "unknown [1].avi" and depicted an approximately pubescent Asian male performing oral sex on an adult male.

15. On October 24, 2012, a publically available site provided information that the

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website www.zhenyouge.com resolved to IP address 64.56.69.18. Further checks showed that this website is hosted by a webhost company named Perfect International, 801 S. Grand Avenue #1024, Los Angeles, California 90017.

16. Based upon this and other information, the Honorable U.S. Magistrate Judge William Connolly, District of Maryland, signed a federal search warrant dated December 3, 2012, to search the contents of the website www.zhenyouge.com from its webhost company, Perfect International. Unfortunately, when the computer hard drive containing this website data was received by the FBI from Perfect International, Inc., the hard drive was found to be damaged. No data could be recovered. However, the screen shots and child pornography downloaded by your Affiant from his undercover computer in Linthicum, Maryland still remain.

17. As a part of the response to the above-mentioned search warrant, Perfect International, Inc. (through their attorney, the Law Firm of Doo and Chong), provided the following information on the customer who had rented the server space for www.zhenyouge.com:

Name:	Jielun Zhou
Email:	zhoujielun1990@gmail.com
State Date:	July 26, 2012
Last Renewal:	October 26, 2012

18. Pursuant to follow up questions posed by your Affiant, Perfect International, Inc.(again, through their attorney) provided the following additional information regarding JielunZhou:

a. All communication with the Jielun Zhou was done via the email address zhoujielun1990@gmail.com.

b. The communication through email was regarding payments and some technical support matters.

CONCLUSION

19. Based on the foregoing, I respectfully submit that there is probable cause that Google, Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043, maintains evidence in the account described in Attachment A to this affidavit of a violation of 18 U.S.C. § 2252A. This evidence, listed in Attachment B to this affidavit, which is incorporated herein by reference, is contraband, the fruits of crime, or things otherwise criminally possessed, or property which is or has been used as the means of committing the foregoing offenses.

20. Therefore, I respectfully request that the attached warrant be issued authorizing the search and seizure of the items listed in Attachment B.

Douglas Macfarlane

Special Agent, FBI

Subscribed and sworn to before me on February 15th, 2013.

HONORABLE JILLYNK. SCHULZE UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

ITEMS TO BE SEIZED AND SEARCHED

This warrant applies to information associated with the electronic account:

zhoujielun1990@gmail.com; which is stored at premises owned, maintained, controlled, or operated by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043

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ATTACHMENT B

SPECIFIC ITEMS TO BE SEIZED

I. Information to be disclosed by Google Inc.

Google Inc. is required to disclose the following information to the government for each account or identifier listed in Attachment A:

1. The contents of all e-mails and instant messages stored in the account, including copies of e-mail and instant messages sent to and from the account, e-mail and instant message drafts, the source and destination e-mails and messages sent addresses associated with each e-mail and message, the date and time at which each e-mail and instant message was sent, and the size and length of each e-mail and instant message, attachments, including visual depictions of children clothed, partially clothed or engaged in sexually explicit conduct pursuant to 18 U.S.C. § 2256;

2. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the types of service utilized, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

3. All records or other information stored by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

4. All records pertaining to communications between

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zhoujielun1990@gmail.com and any person regarding these accounts, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence or instrumentalities of violations of Title 18, U.S.C. § 2252A involving electronic account zhoujielun1990@gmail.com, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

1. Communications to/from the electronic account zhoujielun1990@gmail.com or other electronic data (such as unsent communication drafts) contained in zhoujielun1990@gmail.com that demonstrate violations of Title 18, U.S.C. § 2252A.

2. Records relating to who created, used, or communicated with the account or identifier, including records about their identities and whereabouts.