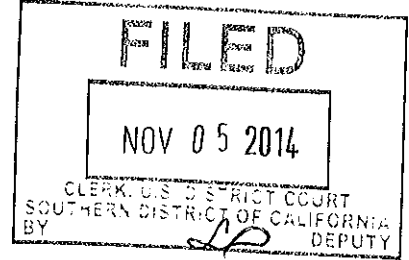


STJ  
11/4/14  
x 8248

# UNITED STATES DISTRICT COURT

for the  
Southern District of California



In the Matter of the Search of  
*(Briefly describe the property to be searched  
or identify the person by name and address)*

Facebook

Case No.

14 MJ 3762

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:  
See Attachment A

located in the Northern District of California, there is now concealed *(identify the person or describe the property to be seized)*:  
See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, U.S.C. section 1591	Child sex trafficking

The application is based on these facts:  
See attached affidavit.

- Continued on the attached sheet.
- Delayed notice of 30 days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Applicant's signature*

Christopher Haughey, Special Deputy US Marshal

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11-5-14

*Judge's signature*

City and state: San Diego, California

Jill L. Burkhardt, United States Magistrate Judge

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT

IN THE MATTER OF THE SEARCH OF  
FACEBOOK

Case No. \_\_\_\_\_

14 MJ 3762

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Chris Haughey, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook user ID that is stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user IDs

www.facebook.com/?sk=ff#!/trapwallacetrippymane;

www.facebook.com/#!/TINYBAMBINOBXTCH;

www.facebook.com/#!/Kfr3zh;

www.facebook.com/#!/sabrinaa.red; and

www.facebook.com/#!/chloe.mcclure.792

2. I am a peace officer employed by the San Diego Police Department (SDPD) and have been so employed for over 7 years. During my tenure as a Police Officer and Detective I have worked in areas of the city that are challenged with

1 prostitution and commercial sexual exploitation. I have worked in an undercover and  
2 investigative capacity in vice, narcotics and auto theft for over three years. I am  
3 currently assigned to the Vice Human Trafficking Unit and have been so assigned  
4 since November 2013. I am dually sworn as a US Special Deputy Marshal and  
5 assigned to the Innocence Lost Task Force (I.L.T.F). During my investigative  
6 experiences I have been involved in or assisted in over 50 pimping and human  
7 trafficking investigations and have operated in an undercover capacity interacting with  
8 pimps, prostitutes and customers of prostitution. The interviews and arrests I have  
9 made with prostitutes, victims, pimps and customers have educated me to their tactics,  
10 jargon and methods of operating here locally as well as the challenges facing victims  
11 of commercial sexual exploitation. Additionally, I spent approximately ten years  
12 working with victims of sexual exploitation as an employee of a nongovernmental  
13 organization (NGO). As part of my current duties, I investigate criminal violations  
14 relating to human trafficking and child exploitation including 18 U.S.C. §1591 (a) and  
15 (b), sex trafficking of a minor, 18 U.S.C. § 2251, sexual exploitation of children, and  
16 18 U.S.C. § 2252(a)(4), possession of matters containing images of minors engaged in  
17 sexually explicit conduct, 18 U.S.C. § 2421 and 18 U.S.C. §2423(a), transportation of  
18 a minor to engage in prostitution.

19 3. The facts in this affidavit come from my personal observations, my  
20 training and experience, and information obtained from other agents and Detectives,  
21 witnesses, a review of computers, cellular phones or other digital media, and/or a  
22 review of documents and phone records obtained from or regarding DORAN  
23 HORTON and the discussed minor females ("MF1" and "MF2"). This affidavit is  
24 intended to show merely that there is sufficient probable cause for the requested  
25 warrant and does not set forth all of my knowledge about this matter.

26 4. Based on my training and experience and the facts as set forth in this  
27 affidavit, there is probable cause to believe that violations of Title 18, United States  
28

1 Code, Sections 1591 (sex trafficking of minors) have been committed by DORAN  
2 HORTON.

3 5. There is also probable cause to search the location/entity described in  
4 Attachment A for evidence of these crimes and contraband or fruits of these crimes, as  
5 described in Attachment B.

#### 6 PROBABLE CAUSE

7 6. On or about September 30, 2014, the victim, (17 year-old minor female,  
8 hereinafter referred to as "MF"), was arrested for prostitution by a San Diego Police  
9 Department detective during an undercover detail. MF agreed to perform a sex act in  
10 exchange for money and acted in furtherance of the agreement.

11 7. I immediately contacted MF following her arrest. She asked me, "Why  
12 am I being arrested? I am only doing what he told me to do." MF told me that a person  
13 with a Facebook account labeled "Oso Montana" met her online and told her to  
14 engage in commercial sex acts. Specifically, he told her to walk a street commonly  
15 used by prostitutes, get into cars that honked, and do whatever the occupant(s) of the  
16 vehicle wanted her to do, in exchange for money.

17 8. I accessed Facebook and showed the Facebook account labeled "Oso  
18 Montana" ([www.facebook.com/?sk=ff#!/trapwallacetrippymane](http://www.facebook.com/?sk=ff#!/trapwallacetrippymane)) to MF. She said that  
19 was "his" Facebook account. MF stated the true name of the individual portrayed in  
20 the Facebook account was "Dorian" or "Doran" or "something like that." Based on the  
21 profile photograph and content of the account, another detective identified the account  
22 as belonging to Doran HORTON. I showed MF a photograph of HORTON and she  
23 positively identified him as "Oso Montana."

24 9. We conducted another search on Facebook and located the Facebook  
25 account "Lucky Lootgo Getta" ([www.facebook.com/#!/TINYBAMBINOBXTCH](http://www.facebook.com/#!/TINYBAMBINOBXTCH)).  
26 The last posting on this account was from August 31, 2014. The account was used  
27 throughout 2013 and the photographs in the public photo section depict HORTON and  
28

1 are some of the same photos used on his current Facebook account, "Oso Montana".  
2 Many of the photographs are of cash, HORTON holding cash, and clothing or  
3 screenshots with the word "trap". In some of the postings by "Lucky Lootgo Getta"  
4 he talks about "hoes" and "Bitches" and making money. Through my experience and  
5 training, I know that the words "trap," "hoes," and "bitches" are frequently used by  
6 pimps and traffickers to refer to prostitutes and acts of prostitution. The birthday  
7 information is listed on this Facebook account as 02-24-1989. This is HORTON's  
8 birthday. Additionally, in one of the postings they refer to "lucky Lootgo Getta" as  
9 "Doran". Many of the friends for "Lucky Lootgo Getta" are the same friends for "Oso  
10 Montana". "Lucky Lootgo Getta" is also a supporter and featured with "Mad House  
11 Entertainment". This is the entertainment or rap group HORTON is a part of and raps  
12 with. Based on the birthday, photographs and postings, it appears this is also  
13 HORTON's Facebook page. Based on my experience with Trafficking investigations,  
14 it is common for traffickers and pimps to have multiple Facebook pages.

15 10. In subsequent statements, MF stated she met HORTON on Facebook, as  
16 "Oso Montana" and knew him because another girl in her group home was being  
17 pimped by him. During the Facebook conversation HORTON talked to MF about  
18 "chasing bandz" and "trap". Based on my training and experience with human  
19 trafficking investigations, I know "chasing bandz" refers to making money from  
20 prostitution acts. I also know the term "trap" refers to the act of prostitution.

21 11. MF said that she and HORTON met in person on September 27, 2014.  
22 She said that HORTON took away her cell phone and purse and refused to return  
23 them to her. She said that over the next three days, HORTON gave her alcohol and an  
24 unknown narcotic, had sexual intercourse with her, and for a few hours locked her in  
25 his garage.

26 12. MF said that on September 30, 2014, HORTON walked her to El Cajon  
27 Boulevard and told her to walk up and down the street and get in the cars that honked.  
28

1 HORTON told MF she was to charge \$60 for a "blow job" and \$100 for "everything".  
2 Based on my training and experience, I know the term "blow job" refers to oral  
3 copulation and the term "everything", when used in prostitution negotiations refers to  
4 sex and oral copulation.

5 13. MF provided me with her password and log on information to her  
6 Facebook account ([www.facebook.com/#!/Kfr3zh](http://www.facebook.com/#!/Kfr3zh)). She gave me consent to go  
7 through her account. When I did so, I saw messages between her and "Oso Montana"  
8 (Facebook account) consistent with what she had told me.

9 14. Following my interview with MF, other detectives and I conducted an  
10 undercover Facebook enticement investigation with HORTON ("Oso Montana").  
11 During this investigation, HORTON was contacted by an undercover detective who  
12 represented herself to him as an adult female. During the course of their interaction, he  
13 gave her direction on how to prostitute and what to charge. He and the undercover  
14 agreed that he would receive some of the proceeds of her prostitution. During his  
15 enticement of the undercover, he used the same terms he used with MF, such as  
16 "Bandz" and "Trap".

17 15. On October 23, 2014 HORTON was arrested for pandering and  
18 attempted pimping when he showed up to a hotel to meet with the undercover  
19 detective. I advised HORTON of his Miranda rights, which he then waived.

20 16. During HORTON's statement, he told me and another detective that his  
21 Facebook account was "Oso Montana," that he knew MF, and that he was with her on  
22 El Cajon Boulevard before she was arrested. He admitted to sending the Facebook  
23 messages to MF and knowing she was seventeen years old. He stated he only wanted  
24 money from MF, but denied being her pimp. HORTON stated he and MF were sort of  
25 like boyfriend and girlfriend. He stated he got into an argument with MF before she  
26 was arrested. HORTON said he has had lots of these types of conversations with other  
27 females on Facebook. HORTON said everyone has their hustles and he just wants  
28



1 money. HORTON said “chasing Bandz” means making money and “trap” or  
2 “trapping” means to prostitute.

3 17. During HORTON’s statement, I told him another unnamed female,  
4 (MF2) posted on her Facebook page ([www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792)) that  
5 “Oso Montana is my nigga”. Based on my training and experience and previous  
6 investigations, I know MF2 was referring to “Oso Montana” as being her man or her  
7 pimp.

8 18. HORTON identified MF2 by name, and said he believed she may have  
9 posted that comment, but denied knowing her.

10 19. On August 6, 2014 MF2 posted on her Facebook page  
11 ([www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792)) that she was in Las Vegas. I conducted an  
12 internet search using the phone number MF2 uses for her Facebook account. I found a  
13 prostitution related advertisement featuring MF2 in Las Vegas.

14 20. On August 11, 2014 MF2 posted on her Facebook page  
15 ([www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792)) “I will always be his main” and put “Oso  
16 Montana” next to her post. Based on my training and experience, I know the term  
17 “main” when used in this context can refer to being the number one earner for a pimp.

18 21. During HORTON’s statement, he told me a female named “Sabrinaa  
19 Red” ([www.facebook.com/#!/sabrinaa.red](http://www.facebook.com/#!/sabrinaa.red)) was arrested for prostitution in National  
20 City. He essentially said they talked on Facebook about “making bandz” on El Cajon  
21 Boulevard. HORTON said “Sabrinaa Red” talked to him about going to LA, but he  
22 never “pimped” on her.

23 22. I electronically notified Facebook that I wanted the account content of  
24 [www.facebook.com/?sk=ff#!/trapwallacetrippymane](http://www.facebook.com/?sk=ff#!/trapwallacetrippymane),  
25 [www.facebook.com/#!/TINYBAMBINOBXTCH](http://www.facebook.com/#!/TINYBAMBINOBXTCH), [www.facebook.com/#!/Kfr3zh](http://www.facebook.com/#!/Kfr3zh),  
26 [www.facebook.com/#!/sabrinaa.red](http://www.facebook.com/#!/sabrinaa.red) and [www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792)  
27 preserved pending the execution of a search warrant.

**BACKGROUND ON THE BUSINESS OF PROSTITUTION**

1  
2 23. Through my training, experience, and consultation with other law  
3 enforcement officers, I have learned that:

4 a. Individuals involved in illicit commercial sex maintain records,  
5 including electronic files, related to their illicit business on computers and computer  
6 servers hosting internet applications such as electronic mail (email) and personal  
7 social networking web pages;

8 b. Individuals involved in illicit commercial sex often solicit clients  
9 through electronic advertisements and other media, such as Craig's List and  
10 backpage.com;

11 c. Individuals involved in illicit commercial sex maintain records of  
12 correspondence relating to client contact information as well as travel and lodging  
13 arrangements involved in such illegal activity;

14 d. Individuals involved in illicit commercial sex maintain documents  
15 and files containing names of associates and/or coconspirators involved in  
16 prostitution;

17 e. Individuals involved in illicit commercial sex maintain financial  
18 records, bank statements, money orders, money order receipts, and cash that are  
19 evidence of payments made in conjunction with prostitution;

20 f. Individuals involved in illicit commercial sex often maintain  
21 documents showing possession, dominion, and/or control of premises paid for by  
22 proceeds of prostitution, including utility statements, telephone statements,  
23 correspondence and rental or lease agreements relating to the premises to be searched;

24 g. Individuals involved in illicit commercial sex commonly earn  
25 income in the form of cash and try to legitimize these profits. In order to do this,  
26 subjects frequently attempt to secrete, transfer, and conceal the money by means,  
27 including, but not limited to: placing assets in names other than their own to avoid  
28



1 detection while maintaining control; laundering the money through what appears to be  
2 legitimate businesses; hiding money in their homes, safes, and safety deposit boxes; or  
3 using the money to buy assets which are difficult to trace. Records of these and other  
4 types of transactions are often found at the residence and business fronts of  
5 individuals involved in illicit commercial sex;

6 h. Individuals involved in illicit commercial sex often operate  
7 business fronts which may appear to be legitimate, but are in fact vehicles used to  
8 conduct and promote prostitution business while avoiding detection or apprehension  
9 by law enforcement;

10 i. Many individuals involved in illicit commercial sex accept major  
11 credit cards, with the name of the business front/payee being reflected on a credit card  
12 statement as a generic entity;

13 j. Individuals involved in illicit commercial sex can keep and  
14 maintain large amounts of bulk United States currency at their residences and business  
15 fronts. Such funds are often used for everyday expenditures and to maintain and  
16 finance their ongoing illegal activity. Additionally, individuals involved in illicit  
17 commercial sex often amass and maintain assets at their residences and or business  
18 fronts which were generated by their illegal activity, or purchased with the cash  
19 earned from said illegal activity;

20 k. Individuals involved in illicit commercial sex use cellular  
21 telephones, personal digital assistants (PDAs), desktop and notebook computers and  
22 maintain these items on their person and/or in their residences and/or business fronts.  
23 Individuals involved in illicit commercial sex use cellular telephones, personal digital  
24 assistants (PDAs), and notebook computers to increase their mobility, coordinate  
25 illicit activities, and to provide pimps and prostitutes with instant access to phone  
26 calls, voice messages, text messages, instant messaging (IM) and internet based  
27 correspondence. These electronic devices allow individuals involved in illicit  
28

1 commercial sex to maintain contact with other pimps, prostitutes, complicit  
2 businesses, and clients. These electronic devices contain wire and electronic data  
3 concerning telephonic contact records, text messages, and electronic mail messages  
4 with co-conspirators and clients, as well as telephone books containing contact  
5 information for co-conspirators and clients. Individuals involved in illicit commercial  
6 sex also utilize digital cameras, cellular telephones, personal digital assistants (PDAs),  
7 desktop and notebook computers with photograph and video capabilities to take  
8 photographs and videos of themselves as well as other coconspirators for the purpose  
9 of electronic advertising and promotion of prostitution. Moreover, I know that digital  
10 evidence can be stored on a variety of systems and storage devices including: hard  
11 disk drives, floppy disk, CD ROMS, DVD ROMS, magnetic tapes, magneto optical  
12 cartridges, personal digital assistants, pagers, money chips, thumb drives, flash drives,  
13 and portable hard drives;

14 1. Individuals involved in illicit commercial sex often drive vehicles,  
15 sometimes rented, leased, or registered in the names of other people, to transport  
16 themselves and coconspirators, inter and intra state, to pre-arranged meetings with  
17 clients to engage in prostitution. These same individuals often get other persons to  
18 rent hotel rooms, pay for online postings or other items to avoid detection.

19 24. Based upon my experience and training, and the experience and training  
20 of other agents with whom I have communicated, the evidence of illegal activity  
21 described above in paragraphs "a" through "i" is maintained by individuals involved  
22 in illicit commercial sex in the residence and vehicles that they and their associates  
23 live in and operate as well as on online accounts such as Facebook, and electronic  
24 mail accounts supported by email providers such as Yahoo!, AOL, and Apple.

25 **PRIOR ATTEMPTS TO OBTAIN DATA**

26 25. The United States has not attempted to obtain this data by other means.

27 //

**GENUINE RISKS OF DESTRUCTION**

1  
2 26. Based upon my experience and training, and the experience and training  
3 of other agents with whom I have communicated, electronically stored data can be  
4 permanently deleted or modified by users possessing basic computer skills.

**FACEBOOK**

5  
6 27. Facebook owns and operates a free-access social networking website of  
7 the same name that can be accessed at <http://www.facebook.com>. Facebook allows its  
8 users to establish accounts with Facebook, and users can then use their accounts to  
9 share written news, photographs, videos, and other information with other Facebook  
10 users, and sometimes with the general public.

11 28. Facebook asks users to provide basic contact and personal identifying  
12 information to Facebook, either during the registration process or thereafter. This  
13 information may include the user's full name, birth date, gender, contact e-mail  
14 addresses, Facebook passwords, Facebook security questions and answers (for  
15 password retrieval), physical address (including city, state, and zip code), telephone  
16 numbers, screen names, websites, and other personal identifiers. Facebook also  
17 assigns a user identification number to each account.

18 29. Facebook users may join one or more groups or networks to connect and  
19 interact with other users who are members of the same group or network. Facebook  
20 assigns a group identification number to each group. A Facebook user can also  
21 connect directly with individual Facebook users by sending each user a "Friend  
22 Request." If the recipient of a "Friend Request" accepts the request, then the two  
23 users will become "Friends" for purposes of Facebook and can exchange  
24 communications or view information about each other. Each Facebook user's account  
25 includes a list of that user's "Friends" and a "News Feed," which highlights  
26 information about the user's "Friends," such as profile changes, upcoming events, and  
27 birthdays.

1 30. Facebook users can select different levels of privacy for the  
2 communications and information associated with their Facebook accounts. By  
3 adjusting these privacy settings, a Facebook user can make information available only  
4 to himself or herself, to particular Facebook users, or to anyone with access to the  
5 Internet, including people who are not Facebook users. A Facebook user can also  
6 create “lists” of Facebook friends to facilitate the application of these privacy settings.  
7 Facebook accounts also include other account settings that users can adjust to control,  
8 for example, the types of notifications they receive from Facebook.

9 31. Facebook users can create profiles that include photographs, lists of  
10 personal interests, and other information. Facebook users can also post “status”  
11 updates about their whereabouts and actions, as well as links to videos, photographs,  
12 articles, and other items available elsewhere on the Internet. Facebook users can also  
13 post information about upcoming “events,” such as social occasions, by listing the  
14 event’s time, location, host, and guest list. In addition, Facebook users can “check in”  
15 to particular locations or add their geographic locations to their Facebook posts,  
16 thereby revealing their geographic locations at particular dates and times. A particular  
17 user’s profile page also includes a “Wall,” which is a space where the user and his or  
18 her “Friends” can post messages, attachments, and links that will typically be visible  
19 to anyone who can view the user’s profile.

20 32. Facebook allows users to upload photos and videos. It also provides  
21 users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a  
22 user is tagged in a photo or video, he or she receives a notification of the tag and a link  
23 to see the photo or video. For Facebook’s purposes, the photos and videos associated  
24 with a user’s account will include all photos and videos uploaded by that user that  
25 have not been deleted, as well as all photos and videos uploaded by any user that have  
26 that user tagged in them.

1 33. Facebook users can exchange private messages on Facebook with other  
2 users. These messages, which are similar to e-mail messages, are sent to the  
3 recipient's "Inbox" on Facebook, which also stores copies of messages sent by the  
4 recipient, as well as other information. Facebook users can also post comments on the  
5 Facebook profiles of other users or on their own profiles; such comments are typically  
6 associated with a specific posting or item on the profile. In addition, Facebook has a  
7 Chat feature that allows users to send and receive instant messages through Facebook.  
8 These chat communications are stored in the chat history for the account. Facebook  
9 also has a Video Calling feature, and although Facebook does not record the calls  
10 themselves, it does keep records of the date of each call.

11 34. If a Facebook user does not want to interact with another user on  
12 Facebook, the first user can "block" the second user from seeing his or her account.

13 35. Facebook has a "like" feature that allows users to give positive feedback  
14 or connect to particular pages. Facebook users can "like" Facebook posts or updates,  
15 as well as webpages or content on third-party (i.e., non-Facebook) websites.  
16 Facebook users can also become "fans" of particular Facebook pages.

17 36. Facebook has a search function that enables its users to search Facebook  
18 for keywords, usernames, or pages, among other things.

19 37. Each Facebook account has an activity log, which is a list of the user's  
20 posts and other Facebook activities from the inception of the account to the present.  
21 The activity log includes stories and photos that the user has been tagged in, as well as  
22 connections made through the account, such as "liking" a Facebook page or adding  
23 someone as a friend. The activity log is visible to the user but cannot be viewed by  
24 people who visit the user's Facebook page.

25 38. Facebook Notes is a blogging feature available to Facebook users, and it  
26 enables users to write and post notes or personal web logs ("blogs"), or to import their  
27 blogs from other services, such as Xanga, LiveJournal, and Blogger.  
28

1 39. The Facebook Gifts feature allows users to send virtual “gifts” to their  
2 friends that appear as icons on the recipient’s profile page. Gifts cost money to  
3 purchase, and a personalized message can be attached to each gift. Facebook users  
4 can also send each other “pokes,” which are free and simply result in a notification to  
5 the recipient that he or she has been “poked” by the sender.

6 40. Facebook also has a Marketplace feature, which allows users to post free  
7 classified ads. Users can post items for sale, housing, jobs, and other items on the  
8 Marketplace.

9 41. In addition to the applications described above, Facebook also provides  
10 its users with access to thousands of other applications on the Facebook platform.  
11 When a Facebook user accesses or uses one of these applications, an update about that  
12 the user’s access or use of that application may appear on the user’s profile page.

13 42. Some Facebook pages are affiliated with groups of users, rather than one  
14 individual user. Membership in the group is monitored and regulated by the  
15 administrator or head of the group, who can invite new members and reject or accept  
16 requests by users to enter. Facebook can identify all users who are currently  
17 registered to a particular group and can identify the administrator and/or creator of the  
18 group. Facebook uses the term “Group Contact Info” to describe the contact  
19 information for the group’s creator and/or administrator, as well as a PDF of the  
20 current status of the group profile page.

21 43. Facebook uses the term “Neoprint” to describe an expanded view of a  
22 given user profile. The “Neoprint” for a given user can include the following  
23 information from the user’s profile: profile contact information; News Feed  
24 information; status updates; links to videos, photographs, articles, and other items;  
25 Notes; Wall postings; friend lists, including the friends’ Facebook user identification  
26 numbers; groups and networks of which the user is a member, including the groups’  
27 Facebook group identification numbers; future and past event postings; rejected  
28



1 “Friend” requests; comments; gifts; pokes; tags; and information about the user’s  
2 access and use of Facebook applications.

3 44. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or  
4 IP address. These logs may contain information about the actions taken by the user ID  
5 or IP address on Facebook, including information about the type of action, the date  
6 and time of the action, and the user ID and IP address associated with the action. For  
7 example, if a user views a Facebook profile, that user’s IP log would reflect the fact  
8 that the user viewed the profile, and would show when and from what IP address the  
9 user did so.

10 45. Social networking providers like Facebook typically retain additional  
11 information about their users’ accounts, such as information about the length of  
12 service (including start date), the types of service utilized, and the means and source  
13 of any payments associated with the service (including any credit card or bank  
14 account number). In some cases, Facebook users may communicate directly with  
15 Facebook about issues relating to their accounts, such as technical problems, billing  
16 inquiries, or complaints from other users. Social networking providers like Facebook  
17 typically retain records about such communications, including records of contacts  
18 between the user and the provider’s support services, as well as records of any actions  
19 taken by the provider or user as a result of the communications.

20 46. Therefore, the computers of Facebook are likely to contain all the  
21 material described above, including stored electronic communications and information  
22 concerning subscribers and their use of Facebook, such as account access information,  
23 transaction information, and other account information.

#### 24 **PROCEDURES FOR ELECTRONICALLY STORED INFORMATION**

25 47. Law enforcement agents and investigative support personnel are trained  
26 and experienced in identifying communications relevant to the crimes under  
27 investigation. The personnel of Facebook are not. It would be inappropriate and  
28

1 impractical for federal agents to search the vast computer network of Facebook for the  
2 relevant accounts and then to analyze the contents of those accounts on the premises  
3 of Facebook. The impact on Facebook's business would be severe.

4 48. Therefore, I request authority to seize all content, including electronic  
5 mail and attachments, stored instant messages, stored voice messages, photographs  
6 and any other content from the Facebook accounts, as described in Attachment B. In  
7 order to accomplish the objective of the search warrant with a minimum of  
8 interference with the business activities of Facebook, to protect the rights of the  
9 subject of the investigation and to effectively pursue this investigation, authority is  
10 sought to allow Facebook to make a digital copy of the entire contents of the accounts  
11 subject to seizure. That copy will be provided to me or to any authorized federal  
12 agent. The copy will be forensically imaged and the image will then be analyzed to  
13 identify communications and other data subject to seizure pursuant to Attachment B.  
14 Relevant data will be copied to separate media. The original media will be sealed and  
15 maintained to establish authenticity, if necessary.

16 49. Analyzing the data to be provided by Facebook may require special  
17 technical skills, equipment and software. It also can be very time-consuming.  
18 Searching by keywords, for example, often yields many thousands of "hits," each of  
19 which must be reviewed in its context by the examiner to determine whether the data  
20 is within the scope of the warrant. Merely finding a relevant "hit" does not end the  
21 review process. Certain file formats do not lend themselves to keyword searches.  
22 Keywords search text. Many common electronic mail, database and spreadsheet  
23 applications, which files may have been attached to electronic mail, do not store data  
24 as searchable text. The data is saved in a proprietary non-text format. And, as the  
25 volume of storage allotted by service providers increases, the time it takes to properly  
26 analyze recovered data increases dramatically.

1           50. Based on the foregoing, searching the recovered data for the information  
2 subject to seizure pursuant to this warrant may require a range of data analysis  
3 techniques and may take weeks or even months. Keywords need to be modified  
4 continuously based upon the results obtained. The personnel conducting the  
5 examination will complete the analysis within ninety (90) days of receipt of the data  
6 from the service provider, absent further application to this court.

7           51. Based upon my experience and training, and the experience and training  
8 of other agents with whom I have communicated, it is necessary to review and seize  
9 all electronic mails that identify any users of the subject account(s) and any electronic  
10 mails sent or received in temporal proximity to incriminating electronic mails that  
11 provide context to the incriminating mails.

12           52. All forensic analysis of the imaged data will employ search protocols  
13 directed exclusively to the identification and extraction of data within the scope of this  
14 warrant.

15           **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

16           53. I anticipate executing this warrant under the Electronic Communications  
17 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by  
18 using the warrant to require Facebook to disclose to the government copies of the  
19 records and other information (including the content of communications) particularly  
20 described in Section I of Attachment B. Upon receipt of the information described in  
21 Section I of Attachment B, government-authorized persons will review that  
22 information to locate the items described in Section II of Attachment B.

23           **CONCLUSION**

24           54. This Court has jurisdiction to issue the requested warrant because it is “a  
25 court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§  
26 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the  
27  
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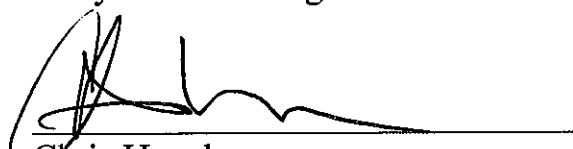
1 United States . . . that – has jurisdiction over the offense being investigated.” 18  
2 U.S.C. § 2711(3)(A)(i).

3 55. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement  
4 officer is not required for the service or execution of this warrant.


5 56. Based on the forgoing, I request that the Court issue the proposed search  
6 warrant. Because the warrant will be executed by Facebook who will then compile  
7 the requested records at a time convenient to it, there exists reasonable cause to permit  
8 the execution of the requested warrant at any time in the day or night.

9 **REQUEST FOR SEALING AND PRECLUSION OF NOTICE**

10 57. This is an ongoing investigation of which the targets are unaware of the  
11 investigative tools relied upon by law enforcement. It is very likely, based upon the  
12 above, that evidence of the crimes under investigation exists on computers or mobile  
13 devices subject to the control of the target or associates. There is reason to believe,  
14 based on the above, that premature disclosure of the existence of the warrant will  
15 result in destruction or tampering with that evidence and seriously jeopardize the  
16 success of the investigation. Accordingly, it is requested that this warrant and its  
17 related materials be sealed until further order of the Court or with disclosure permitted  
18 to defendant’s counsel pursuant to an early disclosure agreement or Rule 16, Fed. R.  
19 Crim. P.

20   
21 Chris Haughey  
22 Special Deputy U.S. Marshal

23 SUBSCRIBED and SWORN  
24 before me this 5<sup>th</sup> day of November 2014

25   
26 THE HONORABLE JILL L. BURKHARDT  
27 UNITED STATES MAGISTRATE JUDGE  
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ATTACHMENT A  
PROPERTY/ENTITY TO BE SEARCHED

Facebook is an Internet service provider with its primary computer information systems and other electronic communications and storage systems, records and data located at 1601 Willow Road in Menlo Park, California 94025.

ATTACHMENT B  
ITEMS TO BE SEIZED

I. Service of Warrant

The officer executing the warrant shall permit Facebook, as custodian of the computer files described in Section II below, to locate the files and copy them onto removable electronic storage media and deliver the same to the officer.

II. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed:

[www.facebook.com/?sk=ff#!/trapwallacetrippymane](http://www.facebook.com/?sk=ff#!/trapwallacetrippymane) and,

[www.facebook.com/#!/TINYBAMBINOBTCH](http://www.facebook.com/#!/TINYBAMBINOBTCH) and,

[www.facebook.com/#!/Kfr3zh](http://www.facebook.com/#!/Kfr3zh) and,

[www.facebook.com/#!/sabrinaa.red](http://www.facebook.com/#!/sabrinaa.red) and,

[www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792)

(a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;



1 (d) All profile information; News Feed information; status updates; links to  
2 videos, photographs, articles, and other items; Notes; Wall postings; friend lists,  
3 including the friends' Facebook user identification numbers; groups and networks of  
4 which the user is a member, including the groups' Facebook group identification  
5 numbers; future and past event postings; rejected "Friend" requests; comments; gifts;  
6 pokes; tags; and information about the user's access and use of Facebook applications;

7 (e) All other records of communications and messages made or received by  
8 the user, including all private messages, chat history, video calling history, and  
9 pending "Friend" requests;

10 (f) All "check ins" and other location information;

11 (g) All IP logs, including all records of the IP addresses that logged into the  
12 account;

13 (h) All records of the account's usage of the "Like" feature, including all  
14 Facebook posts and all non-Facebook webpage's and content that the user has "liked";

15 (i) All information about the Facebook pages that the account is or was a  
16 "fan" of;

17 (j) All past and present lists of friends created by the account;

18 (k) All records of Facebook searches performed by the account;

19 (l) All information about the user's access and use of Facebook  
20 Marketplace;

21 (m) The types of service utilized by the user;

22 (n) The length of service (including start date) and the means and source of  
23 any payments associated with the service (including any credit card or bank account  
24 number);

25 (o) All privacy settings and other account settings, including privacy settings  
26 for individual Facebook posts and activities, and all records showing which Facebook  
27 users have been blocked by the account;

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1 (p) All records pertaining to communications between Facebook and any  
2 person regarding the user or the user's Facebook account, including contacts with  
3 support services and records of actions taken.

4 III. Information to be seized by the government

5 The search of the data supplied by Facebook pursuant to this warrant will be  
6 conducted as provided in the "Procedures for Electronically Stored Information" of  
7 the affidavit submitted in support of this search warrant and will be limited to private  
8 user communications and attachments, stored user files, and identifying information  
9 that constitutes fruits, evidence and instrumentalities of violations of Title 18, United  
10 States Code, Sections 1591 (sex trafficking of minors), have been committed by  
11 DORAN HORTON, including, for each user ID identified below:

12 [www.facebook.com/?sk=ff#!/trapwallacetrippymane](http://www.facebook.com/?sk=ff#!/trapwallacetrippymane) and,

13 [www.facebook.com/#!/TINYBAMBINOBXTCH](http://www.facebook.com/#!/TINYBAMBINOBXTCH) and,

14 [www.facebook.com/#!/Kfr3zh](http://www.facebook.com/#!/Kfr3zh) and,

15 [www.facebook.com/#!/sabrinaa.red](http://www.facebook.com/#!/sabrinaa.red) and,

16 [www.facebook.com/#!/chloe.mcclure.792](http://www.facebook.com/#!/chloe.mcclure.792) and

17 information pertaining to the following matters:

18 (a) sex trafficking, prostitution or pimping;

19 (b) information on backpage.com or other websites used to post prostitution  
20 ads or any and all photographs and/or communication corroborating prostitution acts  
21 and/or locations;

22 (d) Communications between HORTON and other suspected minors or  
23 suspects regarding sex trafficking, prostitution or pimping activities;

24 (e) Communications between the user IDs identified above and others that  
25 show discussion of age in relation to sex trafficking, prostitution or pimping activities;

26 (f) Communications between the user IDs identified above and others that  
27 show the past, current or future education, employment, residence or location;

1 (g) Any dates, times and geographic locations that the users IDs identified  
2 above were active on their Facebook accounts;

3 (h) Any photographs posted on Facebook page of the user IDs identified  
4 above which identify the account holders and any co-conspirators or aiders and  
5 abettors involved with sex trafficking, prostitution or pimping;

6 (i) Records relating to who created, used, or communicated with the user  
7 IDs above, including records about their identities and whereabouts.

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1 CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS  
2 RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)

3 I, \_\_\_\_\_, attest, under penalties of perjury  
4 under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the  
5 information contained in this declaration is true and correct. I am employed by  
6 Facebook, and my official title is \_\_\_\_\_. I am a  
7 custodian of records for Facebook. I state that each of the records attached hereto is  
8 the original record or a true duplicate of the original record in the custody of  
9 Facebook, and that I am the custodian of the attached records consisting of  
10 \_\_\_\_\_ (pages/CDs/kilobytes). I further state that:

11 a. all records attached to this certificate were made at or near the time  
12 of the occurrence of the matter set forth, by, or from information transmitted by, a  
13 person with knowledge of those matters;

14 b. such records were kept in the ordinary course of a regularly  
15 conducted business activity of Facebook; and

16 c. such records were made by Facebook as a regular practice.

17 I further state that this certification is intended to satisfy Rule 902(11) of the  
18 Federal Rules of Evidence.

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20 Date Signature  
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