

UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America
v.

DESMOND BABLOO SINGH

Case No. 1:20-mj-3132 TMD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of ... in the county of ... in the ... District of Maryland, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Includes entries for 18 U.S.C. §§ 2261A(2); 1030(a)(5) (A); 1028A; 1038(a)(1); 1958 and various offenses like Cyberstalking, Intentional Damage to a Protected Computer, etc.

This criminal complaint is based on these facts:

See affidavit.

Continued on the attached sheet.

Handwritten signature of William B. Jones

Complainant's signature

SA William B. Jones, HSI

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 12/14/2020

Handwritten signature of Thomas M. DiGirolamo

Judge's signature

City and state: Baltimore, Maryland

Hon. Thomas M. DiGirolamo, U.S.M.J.

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
and SEARCH WARRANTS

Your affiant, William Jones, a Special Agent with Homeland Security, Homeland Security Investigations having been duly sworn, deposes and states as follows:

1. Your affiant is a Special Agent (SA) with the U. S. Department of Homeland Security, Homeland Security Investigations (HSI), and has been so since March 2019. Your affiant is currently assigned to the Transnational Cyber Crimes Team (TCCT) investigating unlawful acts and violations of federal law with a nexus to the surface web, deep web, or the dark web. Previously, your affiant was assigned to the Document and Benefit Fraud Task Force (DBFTF), investigating unlawful acts and violations of federal immigration and customs law, specifically the investigation and enforcement of the Immigration and Nationality Act, relating to identity and immigration benefit fraud. Your affiant is a graduate of the Criminal Investigator Training Program (CITP) and the HSI Special Agent Training (HSISAT) program located at the Federal Law Enforcement Training Center (FLETC). Prior to becoming a Special Agent, your affiant was employed for four years at the National Security Agency (NSA) as a uniformed police officer. During your affiant's employment at the NSA, your affiant was assigned to the Emergency Response Team (ERT) and the Weapons of Mass Destruction (WMD) Response Team. Your affiant has also functioned as a Paramedic for over 20 years in both the civilian and military arenas. Your affiant graduated with a Bachelor of Science in Biology in 2001.

2. As a federal agent, your Affiant is authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. While employed as a Special Agent, your Affiant has participated, assisted, and led investigations. In the course of those investigations, your Affiant has conducted surveillance,

executed searches, questioned witnesses, utilized search and arrest warrants, and gathered intelligence through various other means. Your Affiant is familiar with the immigration, customs, and other federal statutes such as, but not limited to, violations of Title 18 of the United States Code. As an HSI Special Agent, your Affiant is charged, among other things, enforcing the immigration, customs, and other federal statutes such as, but not limited to the Target Offenses described below.

PERSON TO BE ARRESTED

4. Your Affiant is submitting this affidavit in support of a criminal complaint and arrest warrant for **DESMOND BABLOO SINGH (“SINGH”)**, born June 2001, for violations of 18 U.S.C. §§ 2261A(2) (Cyberstalking), 1030(a)(5)(A) (Intentional Damage to a Protected Computer), 1028A (Aggravated Identity Theft), 1038(a)(1) (False Information and Hoaxes) and 1958 (Murder for Hire) (the **TARGET OFFESNES**). These statutes are further described below.

ACCOUNTS TO BE SEARCHED

5. This Affidavit is also submitted in support of applications for search warrants, pursuant to 18 U.S.C. § 2261A(2)(B) to search the contents of the following electronic accounts:

- a. **Instagram Accounts:** Records and information associated with the following Instagram accounts associated with the 69 Instagram account identifiers, described in Attachment A1, stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a business headquartered at 1601 Willow Road, Menlo Park, CA 94025. Information specific to these accounts can be found in the table set forth in paragraph 37.
- b. **Tiktok Accounts:** Records and information associated with the following Tiktok accounts, described in Attachment A2, stored at premises owned, maintained,

controlled or operated by ByteDance, a business with offices located at 10010 Venice Blvd #301, Culver City, CA 90232:

- i. [REDACTED] Information specific to this account can be found in paragraphs 40-41, below; and,
 - ii. [REDACTED] Information specific to this account can be found in paragraph 61, below;
- c. **Google Accounts:** Records and information associated with the following Google accounts, described in Attachment A3, stored at premises owned, maintained, controlled or operated by Google LLC, a business with offices located at 1600 Amphitheatre Parkway, Mountain View, California, 94043
- i. [REDACTED] Information specific to this account can be found in paragraph 47, below;
 - ii. [REDACTED] Information specific to this account can be found in paragraphs 47 and 63, below;
 - iii. [REDACTED] Information specific to this account can be found in paragraph 59, below;
 - iv. [REDACTED] Information specific to this account can be found in paragraphs 48-49 and 55-56, below; and,
 - v. [REDACTED] Information specific to this account can be found in paragraphs 58-59, below;
- d. **Snapchat Accounts:** Records and information associated with the Snapchat accounts listed below, described in Attachment A4, which are stored at premises

owned, maintained, controlled by Snap, Inc., a business headquartered at 2772 Donald Douglas Loop North, Santa Monica CA, 90405.

- i. [REDACTED] Information specific to this account can be found in paragraph 63, below;
 - ii. [REDACTED] Information specific to this account can be found in paragraph 63, below;
 - iii. [REDACTED] Information specific to this account can be found in paragraph 63, below; and,
 - iv. [REDACTED] Information specific to this account can be found in paragraph 63, below;
- e. **TextNow Account:** Information and records stored at premises controlled by TextNow, Inc. a with offices located at 1 Sutter Street, Suite 800, San Francisco, CA, 94104, United States, relating to the account assigned [REDACTED] registered on July 21, 2020, with associated email [REDACTED], described in Attachment A5. Information specific to this account can be found in paragraphs 54-55, below;
- f. **Apple Accounts:** Records and information stored at premises owned, maintained, controlled, or operated by Apple, Inc., a business headquartered at 1 Infinite Loop, Cupertino, CA 95014, and associated with the following Apple accounts, described in Attachment A6:
- i. [REDACTED]
Information specific to this account can be found in paragraph 30, below;
and,

ii. [REDACTED]

Information specific to this account can be found in paragraph 30, below;

- g. **AT&T Wireless Account:** Records and location information stored at premises owned, maintained, controlled, or operated by AT&T Corporation, a wireless telephone service provider headquartered at 11760 U.S. Highway 1, North Palm Beach, FL 33408, and associated with the cellular telephone assigned call number [REDACTED] with International Mobile Subscriber Identity / Electronic Serial Number [REDACTED] with listed subscriber(s) “BAB LOO” (the “**TARGET PHONE**”) described in Attachment A7. Information specific to this account can be found in paragraphs 29-30, 38, 47, 49, 59, and 61, below;

collectively, the **TARGET ACCOUNTS**.

6. Because the warrant for location information relating to the **TARGET PHONE** seeks the prospective collection of information, including cell-site location information, that may fall within the statutory definitions of information collected by a “pen register” and/or “trap and trace device,” *see* 18 U.S.C. § 3127(3) & (4), the requested warrant is designed to also comply with the Pen Register Act. *See* 18 U.S.C. §§ 3121-3127. The requested warrant therefore includes all the information required to be included in an order pursuant to that statute. *See* 18 U.S.C. § 3123(b)(1).

7. As set forth below, there is probable cause to believe that a search of the **TARGET ACCOUNTS** may uncover the evidence, fruits, and/or instrumentalities of violations of the **TARGET OFFENSES**.

8. Your Affiant has personally participated in this investigation and has witnessed many of the facts and circumstances described herein. Your Affiant has also received information

from other federal and local law enforcement and intelligence officials relating to this investigation. The information set forth in this affidavit is based on your Affiant's observations and review of documents, or reliable information provided to your Affiant by other law enforcement personnel. Your Affiant is setting forth only those facts and circumstances necessary to establish probable cause for the issuance of the requested search warrants. However, your Affiant has not omitted any fact which might tend to defeat a finding of probable cause. Unless otherwise indicated, all written and oral statements referred to herein are set forth in substance and in part, rather than verbatim.

THE TARGET OFFENSES

9. **Cyberstalking (18 U.S.C. § 2261A(2))**: “Whoever . . . with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate, uses . . . any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that . . . places that person in reasonable fear of the death of or serious bodily injury to a person . . . or, causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person . . . shall be punished . . . ” with a fine or imprisonment for not more than five years.

10. **Intentional Damage to a Protected Computer (18 U.S.C. §§ 1030(a)(5)(A))** “Whoever . . . knowingly causes the transmission of a program, information, code, or command, and as a result of such conduct, intentionally causes damage without authorization to a protected computer. . . shall be punished” with a fine or imprisonment for not more than ten years, or both.

11. **Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1))**: “Whoever, during and in relation to any felony violation enumerated in subsection (c) [including 18 U.S.C. § 1030],

knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person shall, in addition to the punishment provided for such felony, be sentenced to a term of imprisonment of 2 years,” to be served consecutive to any other sentence.

12. **False Information and Hoaxes (18 U.S.C. § 1038(a)(1))**: “Whoever engages in any conduct with intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of . . . [*inter alia*, 18 U.S.C. § 844(i), Malicious Destruction of Property by Explosives], shall—be fined under this title or imprisoned not more than 5 years, or both”

13. **Murder for Hire (18 U.S.C. § 1958)**: “Whoever . . . uses or causes another (including the intended victim) to use the mail or any facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, or who conspires to do so, shall be fined under this title or imprisoned for not more than ten years, or both”

TERMS/DEFINITIONS

SWATTING

14. “Swatting” refers to a criminal harassment tactic whereby a person places a false call to emergency services such as a bomb threat or hostage situation to trigger a police force and/or a special weapons and tactics (“SWAT”) team response to a specific address—thereby causing a life-threatening situation.

INSTAGRAM

15. Instagram, frequently referred to as “IG” or “Insta,” is a photo and video sharing social networking service owned by Facebook, Inc. The application (app) allows users to upload media that can be edited with filters and organized by hashtags and geographical tagging. Posts can be shared publicly or with pre-approved followers. Users can browse other users’ content by tags and locations and view trending content. Instagram also allows users to send direct messages (DMs) to other users.

SNAPCHAT

16. Snapchat is a multimedia messaging app developed by Snap, Inc. One of the principal features of Snapchat is when users post pictures and messages, they are usually only available for a short time before they become inaccessible to their recipients. The app has evolved from originally focusing on person-to-person photo sharing to presently featuring users’ “Stories” of 24 hours of chronological content. Snapchat also allows users to keep photos in a “my eyes only” space, which lets them keep their photos in a password-protected space. Snapchat has also reportedly incorporated limited use of end-to-end encryption, with plans to broaden its use in the future.

TIKTOK

17. TikTok is a video-sharing social networking service owned by ByteDance. It is used to create short music, lip-sync, dance, comedy, and talent videos of 3 to 15 seconds, and short looping videos of 3 to 60 seconds. Videos can be shared or stored publicly or privately. The TikTok app allows users to interact with each other through comments to videos, direct messages, and live chats.

GOOGLE

18. Google provides numerous free services to users with a Google account. Some of these services include, Gmail, YouTube, Voice, Blogger, Google+, Android, Photos, Drive, Location History, and Search and Browsing History. Gmail is a web-based email service. YouTube is a free video sharing website that allows users upload, view and share videos. Voice is Google's calling, voicemail transcription, and text messaging service. Blogger is Google's free weblog publishing tool for sharing text, photos, and video. Google+ is a forum to share photos, videos, and other information with other users. Android is Google's open source operating system used for mobile devices. Photos stores images for a broad range of Google products. Drive is Google's online storage service for a wide range of file types.

TEXTNOW

19. TextNow is an application which provides free telephone and texting service via WiFi that can be utilized via phone, tablet or computer. When users activate a TextNow account they are provided a telephone number that allows for phone calls, free texting, access to a voicemail account, group texting, and conference calling. In my training, knowledge, and experience, TextNow retains the content of text messages sent or received by its users.

APPLE ACCOUNTS

20. Apple Inc. ("Apple") is an American multinational corporation that designs, develops, and sells consumer electronics, computer software and personal computers, including the iPhone, a "smart phone" with the capability to function as a telephone, image and video recording device, and includes many, if not all of, the capabilities of a desktop computer.

21. Apple, Inc., provides users with the ability to store files, photographs, and messages, on a drive that is housed on data servers not located on the users device. The user can

capture the data on their computer or mobile device, then upload or sync the data to servers owned and operated by Apple, Inc. Once the data is uploaded or synched the user can remove the data from their computer or mobile device, but still be able to access data from any computer by logging onto their iCloud account. Apple, Inc., provides users with 5GB of free space upon signing up for iCloud services; however, the user can upgrade to as many as multiple terabytes of storage space for a monthly fee. Apple also provides its users with email addresses at the domains @icloud.com, @mac.com and @me.com.

22. “iMessage” is an Apple propriety messaging platform which allows users of Apple devices to share text, image and video communications. Using the Messages application on any Apple device that uses Apple iOS, such as an iPhone, or Mac OS X, a user can send an iMessage to any other iOS or Mac OS X device. Further, iMessages sent from one Apple device can appear on all other Apple devices that are associated with the same Apple ID, and have activated the Messages application on that device. An iMessage is sent and received based on an Apple ID, but can also be sent based on the user’s telephone number, if a telephone number is associated with that device. If an iMessage is sent, the message uses an Internet data connection, whether that connection is provided by the mobile telephone service provider or a Wi-Fi hotspot. If a data connection is not available to the Apple device, or the Apple device is sending a message to a non-Apple device, the Messages application will default to traditional SMS if possible for delivery of the message.

DOXING/DOXBIN

23. Doxing, or document tracing, is the malicious targeting of an individual or organization by publicly broadcasting the individual or organization’s personally identifiable information (PII). Doxing is used to perpetrate harassment or violence against a target.

24. Doxbin is a document sharing and publishing website for text-based information where users are invited to publish personally identifiable information or “dox” of any person of interest.

PROBABLE CAUSE

Background¹

25. Desmond Babloo SINGH, born June 2001, is believed to currently reside in or around Queens, New York. As a child, SINGH was a resident of Maryland, before relocating to Texas.

26. The individual referred to in this affidavit as “Jane Doe” resides with her family in Maryland when she is not attending college in New York. In approximately 2013-2014, when Jane Doe was a middle school student, she was a friend of SINGH’s older sister during one school year. At the end of the school year, SINGH’s family relocated to Texas. Jane Doe was not close friends with SINGH’s sister, and they did not stay in touch after the SINGH family moved.

27. Jane Doe has never met SINGH in person, and has never been in any sort of relationship with SINGH. Jane Doe only knows SINGH as the younger brother of an old friend from middle school.

28. Around the time the SINGH family moved to Texas, SINGH sent Jane Doe requests to follow her on multiple social media platforms, and Jane Doe granted the requests. Between 2014 and February 14, 2020, Jane Doe engaged in only a handful of brief messaging conversations with

¹ Much of the information set forth herein was obtained from the victim, including through interviews with state and federal law enforcement officers. Her statements are corroborated by the many messages and other communications she provided to investigators, and through a review of the publicly available websites and social media accounts that were still active and able to be reviewed by investigators.

SINGH. She stated that she occasionally received strange and sometimes offensive messages from SINGH. Jane Doe ignored most of SINGH's messages.

29. In approximately November 2019, Jane Doe exchanged messages with SINGH about living in New York. These included Apple iMessages, screenshots of which Jane Doe has provided to investigators, between SINGH and Jane Doe, with SINGH using the phone number

30. According to information provided by AT&T, [REDACTED] is assigned to "BAB LOO" at the Texas address known to belong to SINGH's parents. The number is assigned to a device with the associated [REDACTED]. According to information provided by Apple, that device is an Apple iPhone 11, purchased April 27, 2020. The device is associated with two Apple accounts, [REDACTED] and

[REDACTED] The iTunes subscriber listed with each account is "Desmond Singh."

31. On February 14, 2020, SINGH sent an Instagram story to Jane Doe from his account with the username [REDACTED] consisting of text and an image of a necklace. The message read:

I GOT YOU THIS VIVIENNE WESTOOD NECKLACE AND KISSER THE GIRAFFE [IT'S STILL ON ITS WAY] AND I GO TO LIM [I ONLY APPLIED THERE AND FIT] BUT IM TAKING THE SEMESTER OFF BECAUSE I REALLY AM WORKING FOR FEDEX AND CBA WITH SCHOOL RIGHT NOW BECAUSE I GENUINELY DESPISE EVERYONE THERE AND I DIDN'T GET INTO FIT PROBABLY BECAUSE MY FALL GRADES WERE STILL PROCESSING AND THEY WERE MOST LIKELY STILL LOOKING AT MY HIGH SCHOOL GRADES BUT I HAD A 3.1 AND MY ESSAY WAS REALLY GOOD SO IDK BUT I'M APPLYING AGAIN FOR SOPHOMORE YEAR AND I'M STAYING WITH ONE OF MY FRIENDS IN LI UNTIL I GET AN APT IN MANHATTAN WHICH SHOULD BE IN LIKE A COUPLE WEEKS OR SO I'M

FLYING BACK TO AUSTIN TODAY AND COMING BACK ON WEDNESDAY I COULD LITERALLY COME TO MANHATTAN EVERY DAY WHENEVER YOU WANT ME TO I DON'T CARE IF IT'S 5AM AND YOU WANT TO SEE ME FOR ABSOLUTELY NO REASON IT WOULD TAKE ME AN HOUR AT THE MOST BUT ANYWAYS I LOVE YOU. DID YOU SEE THE PARAGRAPH IF NOT HERE IS THE LINK AGAIN, [link to privatebin.net webpage] I LOVE YOU SO MUCH THERE IS LITERALLY NOTHING I CAN SAY TO TRULY EMPHASIZE IT. I DON'T WANT TO DOUBLE TEXT YOU I HONESTLY DON'T KNOW WHAT'S GOING ON AND I'M REALLY SCARED AND CONFUSED AND HAVE BEEN FOR THE PAST 6 MONTHS.

I REMOVED EVERYONE FROM MY CLOSE FRIENDS EXCEPT YOU ONLY YOU CAN SEE THIS.

32. The story linked to a paragraph posted on privatebin.net, a text-sharing website. In the text, SINGH further professed his love for Jane Doe:

 This document will expire in 23 hours.

nothing i can say could truly emphasize how much of an insanely talented, powerful, beautiful, intelligent, and perfect human being you are. Two quotes that I feel like most corresponds with how I feel about you by Sylvia Plath "I too want to be important. By being different. And these girls are all the same." and "When you give someone your whole heart and he doesn't want it, you cannot take it back. It's gone forever." I work with so much effort into doing things that could potentially impress you. I like you more and more every day. The only thing that kept me motivated throughout high school was the thought of potentially having the chance of going out with you. Every meticulous detail about you, your straight dark brown hair, your brown/green eyes, your demeanor, your talent, your sense of humor, and everything else is the epitome of perfection.

33. Jane Doe rejected SINGH's romantic advances, stating that she was not interested in a relationship with him. Jane Doe asked SINGH not to contact her any further.

SINGH Harasses and Threatens Jane Doe

34. As set forth in detail below, beginning on approximately April 18, 2020, and continuing through at least November 24, 2020, SINGH has used more than one hundred different social media, electronic communication, and phone accounts to send Jane Doe harassing and unsolicited messages.

35. These messages include express and implied threats of death and bodily injury, sexualized violence, and racial slurs. SINGH has accessed several of Jane Doe's electronic accounts without authorization, changing her passwords to lock her out of her accounts and posting offensive images and statements to her accounts without authorization. SINGH obtained personal images that had been privately stored in Jane Doe's Snapchat account. These images were later posted on social media accounts used to harass Jane Doe, and sent via text message to Jane Doe and her family members.

36. SINGH has "doxed" Jane Doe on a number of occasions, publicly posting her address, phone number, and electronic accounts, and encouraged others to harass the victim. SINGH publicly posted personally identifying information of Jane Doe's family members. SINGH has also sent harassing messages and posted messages attacking an ex-boyfriend of Jane Doe, who, based on SINGH's messages, SINGH apparently views as a romantic rival. SINGH has "swatted" Jane Doe, causing a police response to her Baltimore County residence in response to a bomb threat email. SINGH has solicited others online to rape, murder, and decapitate Jane Doe in exchange for Bitcoin. SINGH's course of conduct has caused Jane Doe substantial emotional distress and fear for her life and safety.

SINGH's Social Media Harassment and Threats Against Jane Doe

37. On or about April 18, 2020, Jane Doe noticed the first harassing Instagram account. The account was created with a photo of Jane Doe, and a caption stating "Desmond's #1 fan." Over the ensuing months, Jane Doe was inundated with harassing and threatening posts and messages from at least 69 different Instagram accounts. Many of the accounts had usernames incorporating part or all of Jane Doe's true name. Some of the account names included racial slurs. Many of the posts and messages included images of Jane Doe, including personal images that had been stored in one of her accounts. The images shared by the accounts also included violent and disturbing images with photographs of Jane Doe and her family members superimposed on them. The posts and messages include threats of violence and death, including sexualized violence, and racial slurs. Some of the accounts appeared to target or impersonate the childhood friend of Jane Doe's that SINGH apparently perceived as a romantic rival. Jane Doe provided investigators access to the messages she received and accounts she viewed. They are summarized in the chart below:

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
1	██████████	Bio is Jane Doe's name and "Only purpose is to copy people and destroy my fat body." Posts include direction to others to contact Jane Doe's other accounts, and images of Jane Doe's face superimposed over other bodies and a toy dinosaur.
2	██████████	Profile pic is an altered image of Jane Doe. Bio is a link to a website containing Jane Doe's personal information. Posts include images of Jane Doe.
3	████████████████████	Account name is the street address of Jane Doe's Baltimore County residence.
4	████████████████████	Posted "Actual Broke Kid Beta keep ur head down g if I see u on the streets it's on sight u better pray im out this jawn as soon as possible"
5	██████████	Messaged "hello I have 1k+ 2012 accs that are hard to get banned they're just going to keep coming enjoy. 3 new today just for you."

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
6	[REDACTED]	Messaged “doing something special for ur birthday guess”
7	[REDACTED]	Messaged “you’re a spic” “Happy birthday Ugly Genetically Mutated Spic Facial Features Scum”
8	[REDACTED]	Posted “bitch is going out with an alien LOL + imaging being bullied for being overweight in 2020 and a spic. ” Private images of Jane Doe “[Jane Doe’s Name] throwing party at [Jane Doe’s Street Address] tomorrow guys” Phone numbers and an email address associated with Jane Doe and her family.
9	[REDACTED]	Posts include Jane Doe’s name, birthdate, residence address, parents’ names, and claims she is obsessed with and stalking the user. Posted images include altered and personal images of Jane Doe.
10	[REDACTED]	Bio is “Hey guys it’s [Jane Doe] the stalker spic [pride flag emoji] [Mexican flag emoji] throwing party at [Jane Doe’s residence address]”
11	[REDACTED]	Profile picture is text reading “[Jane Doe] IS A STALKER ”. Bio is Jane Doe’s name followed by “Party @ [Jane Doe’s Baltimore County address].” Posts include numerous altered images of Jane Doe, racial slurs, and other attacks.
12	[REDACTED]	Profile picture is an image of Jane Doe. Bio is “Throwing party at [Jane Doe’s Baltimore County address].” Posts include a photograph of a stack of printed versions of harassing posts apparently held by someone walking on the street. Messages to Jane Doe include “Hello do you even exist my god you’re a clown you’re life is ruined and there’s more coming ugly gorl”
13	[REDACTED]	Profile picture is an altered image of Jane Doe. Bio is Jane Doe’s name and Baltimore County address. Posted images include personal images of Jane Doe.
14	[REDACTED]	Images of Jane Doe and the message “ugly cross eyed bitch”
15	[REDACTED]	Posts include altered and personal images of Jane Doe and the message “Ugly Fuck. You’re gonna let this thing live???” and “waste of life” “[Jane Doe] is a stalker and needs to be put down!!!! [Jane Doe] everyone!!!!!!!!!!”
16	[REDACTED]	Posts include altered and personal images of Jane Doe and the message “Ugly Fuck. You’re gonna let this thing live???”

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
17	[REDACTED]	Messaged "if u really were going out with someone and he's just casually sitting there doing nothing about all this shit I'm doing than that also process that he's a beta"
18	[REDACTED]	Profile picture is of a partially nude woman bound and lying in a cage. Bio is "Masochistic Submissive Ashtray I like to copy other people." Images include the toy dinosaur picture that Jane Doe's face is superimposed on in posts on other accounts.
19	[REDACTED]	Profile picture is an image of Jane Doe. Bio is "[Jane Doe's birth date]-6/6/2020," implying that is the date of her death.
20	[REDACTED]	Posted images are of Jane Doe's face superimposed on other bodies with messages including "Waste of life" and "Fat Spic Whore Used Victim"
21	[REDACTED]	Profile pic is an altered image of Jane Doe. Bio includes "I WANNA AMPUTATE MY LEG." Posts include an image of Jane Doe's face superimposed over the body of a man in a tuxedo, along with a Mexican flag and the text "KILLED IN COLD BLOOD"
22	[REDACTED]	Image of woman's body lying on the floor with another person performing chest compressions on them. An image that appears to be Jane Doe's mother is edited onto the body's face. The message reads "HELPPPP GUYS MY MOM" Image of woman with Jane Doe's face edited onto it labeled "Fat Spic Whore Used Victim"
23	[REDACTED]	Messaged "happy early birthday ur accounts are gone forever [Jane Doe]" "i hope your entire poverty stricken bloodline dies of brain cancer"
24	[REDACTED]	Profile picture is an image of a person with Jane Doe's face superimposed on another body, as are the posted images.
25	[REDACTED]	Profile picture is a drawing with Jane Doe's face superimposed. Bio states "new account [Jane Doe's name] PLAY WITH HER EMOTIONS." Posts include direction to others to contact Jane Doe's other accounts, and images of Jane Doe's face superimposed over other bodies.
26	[REDACTED]	Posts include direction to others to contact Jane Doe's other accounts and images of Jane Doe with a racial slur superimposed.

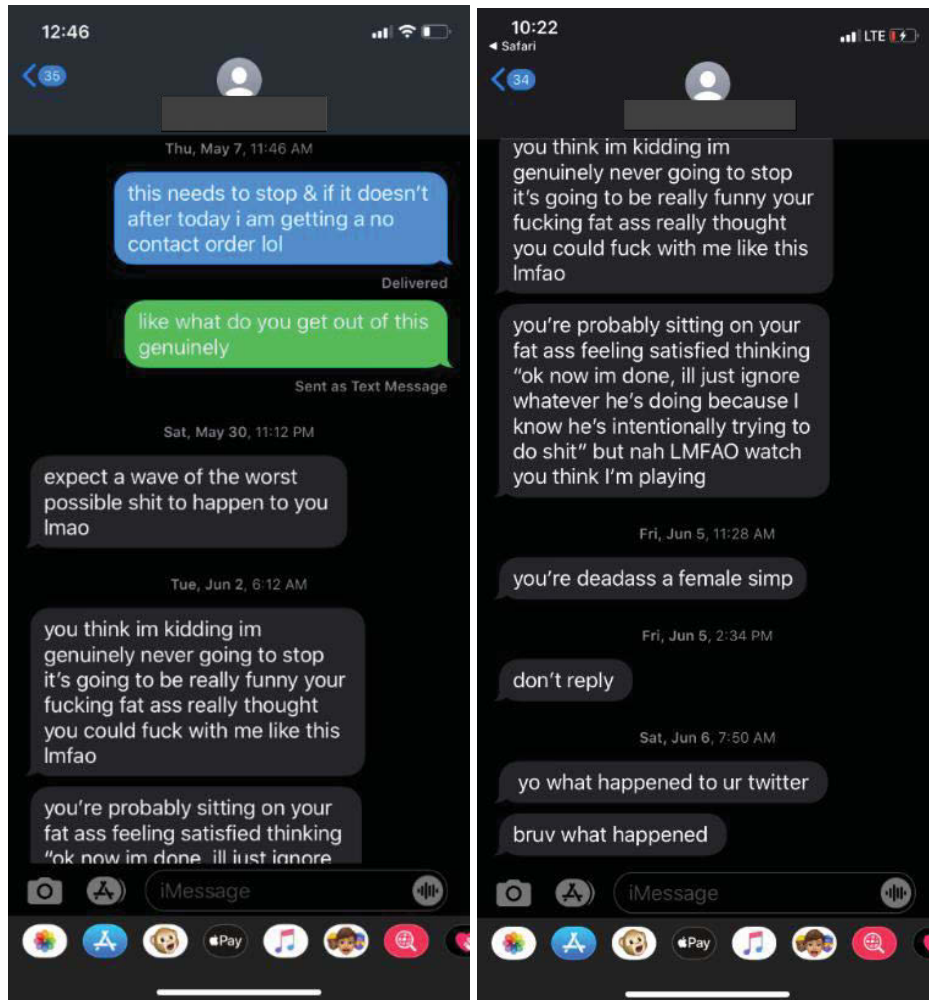
#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
27	[REDACTED]	Apparent link to a website with personal images of Jane Doe with the text "The Ugliest Bitch on Earth." Messages including "what do you have nothing" "why are you obsessed with me boring" "surprise just for you very soon"
28	[REDACTED]	Profile pic is an image of Jane Doe apparently crying. Bio is "Spiccy stalker following me on the subway." Posts include personal and altered images of Jane Doe.
29	[REDACTED]	Unsolicited image sent to Jane Doe blurred by Instagram to protect from unwanted content.
30	[REDACTED]	Profile pic is an altered image of Jane Doe. Messages include personal images of Jane Doe and a link to a website containing Jane Doe's personal information.
31	[REDACTED]	Wrote "You are in debt to me Slave Admit it Loser You're a fucking loser"
32	[REDACTED]	Altered image of Jane Doe followed by "ugly fuck" "you're done" "more?"
33	[REDACTED]	Image of a number of bodies hanging from nooses on a tree with Jane Doe and others' faces superimposed on the bodies.
34	[REDACTED]	Profile pic is an image of Jane Doe. Posted pictures include a list of other Instagram accounts used to harass Jane Doe with a message asking users to follow all of their other accounts.
35	[REDACTED]	Image of a partially nude woman with another face superimposed onto it.
36	[REDACTED]	Profile picture is an image of Jane Doe. Bio is a New York address. Messages include a reference to the address, followed by "are u home rn"
37	[REDACTED]	Messaged "im fuckin [Instagram user account] rn we laughing at that pic of u and the screenies of ur accs being deleted"
38	[REDACTED]	Images include Jane Doe's face superimposed over various drawings and bodies, including a partially nude woman and a woman kneeling in front of a man. One post asks users to contact Jane Doe on one of her social media accounts.
39	[REDACTED]	Bio is "All the smelly arabs [sick emoji, 7 bomb emojis]" Posts include images of young man shown in several other accounts used to message Jane Doe and text reading "restraining order needed"

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
40	[REDACTED]	Profile image is of a young man with the text "Waste of life." Posted images include altered images of the same young man and multiple references to Jane Doe claiming she is a stalker..
41	[REDACTED]	SINGH's primary account used to communicate with Jane Doe before and after harassment began in April 2020. Used to send the 2/14/20 message professing love for Jane Doe.
42	[REDACTED]	Posts include images altered to include Jane Doe's face and the phrases "KILLED IN COLD BLOOD" and "Fat Spic Whore Used Victim" One post is of a family dressed in black mourning at a graveside, with a picture of Jane Doe's mother superimposed over the family's mother.
43	[REDACTED]	Bio is "Hiding in Baltimore Currently Scared to Fight Desmond." Messages to Jane Doe include "spic facial features u look like ur mom and that's not a compliment"
44	[REDACTED]	Messaged "ugly obese spic and dirt poor obsolete arab"
45	[REDACTED]	Messaged "ugly obese spic and dirt poor obsolete arab"
46	[REDACTED]	Messaged "spic facial features u look like ur mom and that's not a compliment" "doing something special for ur birthday"
47	[REDACTED]	Profile pic is an image of a Jane Doe's ex-boyfriend. One of the posted images is of a woman sweeping a floor with Jane Doe's face superimposed on her body.
48	[REDACTED]	Posts include images of bodies and dinosaurs with Jane Doe's face superimposed on them and an image of Jane Doe with a superimposed image of a man with a syringe in his neck and blood on his face and a caption reading "I CAN'T STOP EATING"
49	[REDACTED]	Drawings of a nude woman kneeling in front of a man in a suit, with Jane Doe's face superimposed on the woman.
50	[REDACTED]	Profile pic is an altered image of Jane Doe. Bio includes "I WANNA AMPUTATE MY LEG." Posts include an image of Jane Doe's face superimposed over the body of a man in a tuxedo, along with a Mexican flag and the text "KILLED IN COLD BLOOD"

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
51	[REDACTED]	Image of a female in the profile picture and posts. The bio refers to a person as a "smelly arab," and the bio and posts reference needing a restraining order.
52	[REDACTED]	Profile pic is an image of Jane Doe. Bio includes a Mexican flag and "Disposable." Posts include images of Jane Doe.
53	[REDACTED]	Posts include a message posing as Jane Doe's ex-boyfriend stating they are suicidal. Includes a phone number and social media accounts and requests users to "please help please"
54	[REDACTED]	Bio name is listed as Jane Doe, and links to her other social media handles. Posts include "I love to follow people I have never talked to in real life on the subway and dickride them over the internet because I have nothing better to do with my life"
55	[REDACTED]	Lengthy paragraph claiming to be written by Jane Doe and including an altered image of Jane Doe as its avatar. Lengthy personal attacks on Jane Doe, and claims that Jane Doe is stalking people on the subway and should be taken advantage of. The message includes several of Jane Doe's social media accounts and her phone number, and encourages readers to contact her.
56	[REDACTED]	Posted messages include several of Jane Doe's social media accounts and claims that she is stalking the poster, as well as references to Jane Doe's high school.
57	[REDACTED]	Profile picture is an image of a person with Jane Doe's face superimposed. Bio is "Broke Spic NEED LIPOSUCTION ASAP." Posted images include images of Jane Doe and racial slurs.
58	[REDACTED]	Instagram image sent to Jane Doe blurred by Instagram because she had not chosen to open it. "31k people saw it how do u feel"
59	[REDACTED]	Posts include claims that Jane Doe is a stalker and asking others to contact her other social media accounts. They include Jane Doe's social media handles and phone number.
60	[REDACTED]	Posts include claims that Jane Doe is a stalker and asking others to contact her other social media accounts. They include Jane Doe's social media handles and phone number.

#	INSTAGRAM USERNAME (DISPLAY NAME)	ACCOUNT SUMMARY AND SELECTED CONTENT
61	[REDACTED]	Profile pic is an altered image of Jane Doe. Bio includes "I WANNA AMPUTATE MY LEG." Posts include an image of Jane Doe's face superimposed over the body of a man in a tuxedo, along with a Mexican flag and the text "KILLED IN COLD BLOOD"
62	[REDACTED]	Bio claiming to be Jane Doe's new account including a profile picture of Jane Doe. Posts include claims that Jane Doe is a stalker and asking others to contact her other social media accounts, as well as images of Jane Doe's face superimposed on other people's bodies.
63	[REDACTED]	Bio is the name of Jane Doe's ex-boyfriend. Posted image is an image apparently of Jane Doe's ex-boyfriend that appears on several of the other accounts used to harass Jane Doe.
64	[REDACTED]	Messaged "yo ur obsolete"
65	[REDACTED]	Messaged "u enjoying the twitter bots? Expect to get suspended in like a couple days and u rig to get disabled too + more" "u don't know me lmao i have connections and ur just a harmless fat bitch"
66	[REDACTED]	Profile picture is an image of Jane Doe. Posted images of Jane Doe including racial slurs.
67	[REDACTED]	Profile picture is an image of Jane Doe. Posted images include text claiming the Jane Doe has been harassing and following the poster. Posts include images with Jane Doe's face superimposed over other bodies.
68	[REDACTED]	Profile picture is an image of Jane Doe. Bio "Fat and Mexican low tier basic girl self hating loser"
69	[REDACTED]	Bio lists name as Jane Doe and the description "physical and mental abuse victims"

38. After the harassment began on April 18, 2020, SINGH continued to send threatening text messages to Jane Doe from his AT&T Wireless number, [REDACTED] including the following:



39. Between in or about June 3 and 20, 2020, the Twitter account [REDACTED] was used to send several tweets, including posting an image of a man's body with Jane Doe's face superimposed on it. The account posted several messages denigrating Jane Doe.

40. Jane Doe provided law enforcement officers a screenshot of the TikTok account [REDACTED] which displayed a video showing a photo of Jane Doe's face with the caption "[Jane Doe] Is A Female Simp!!"² On July 19, 2020, Jane Doe received a message on TikTok from

² The term "simp" has been used in recent times, commonly on social media, in a demeaning manner, to describe a person—usually a heterosexual male—who devotes attention to a person (usually of romantic interest) but receives nothing in return.

██████████ The message included an image of Jane Doe and a caption stating Jane Doe was obsessed with the sender and claims Jane Doe was following him on the subway.

41. On June 21, 2020, the Twitter account ██████████ was used to post a TikTok video, posted by the TikTok user ██████████. The TikTok video includes images of Jane Doe, including images of a body apparently being tortured with Jane Doe's face superimposed on it.

42. The Twitter account ██████████ was also used to send harassing messages about Jane Doe. The account's display name is "[JANE DOE] IS OBSESSED]." The account's publicly visible tweets and replies include many of the same images and racial slurs posted by the harassing Instagram accounts. These include a June 29, 2020, post of an image of Jane Doe and her mother's faces with the caption "spic facial feature moodboard."

43. SINGH's known Twitter account, ██████████ was used to post images of Jane Doe and message the victim as well. Jane Doe provided an image of the message (without an available datestamp), stating "this bitch [Jane Doe's social media handles] is legit OBSESSED with me and has been since 2014, she keeps texting me paragraphs and literally FOLLOWED me on the subway multiple times. it's so pathetic and weird, female simps do exist. Imfao." Images of this tweet, and the number of impressions it received, were also sent to Jane Doe's Instagram account by the Instagram accounts used to harass her.

44. On July 13, 2020, Jane Doe petitioned for and obtained an interim peace order with the District Court of Maryland for Baltimore County, seeking protection from stalking by SINGH. On July 13, 2020, Jane Doe also filed an application for a statement of charges with the District Court of Maryland for Baltimore County. On July 24, 2020, the District Court of Maryland for Baltimore County entered a temporary peace order against SINGH. Law enforcement officers were

unable to locate SINGH to serve him with court documents, and he did not appear at scheduled temporary or final peace order hearings.

July 20, 2020, Swatting

45. On July 19, 2020, less than a week after Jane Doe petitioned for a peace order against SINGH, Jane Doe received an Instagram follow request from the account [REDACTED]. The account [REDACTED] included pictures of Jane Doe's house, her ex-boyfriend's house, and information doxing Jane Doe. The account included a message stating "[Jane Doe] throwing a Party At [Jane Doe's Baltimore County Residence Address] tomorrow guys."

46. According to information provided by Instagram, the account [REDACTED] was created on July 19, 2020, with a registered email address of [REDACTED].

47. According to information provided by Google, the account [REDACTED] was created on May 7, 2016 and has a recovery email of [REDACTED] and a contact phone number of [REDACTED], known to belong to SINGH.

48. On the evening of July 19, 2020, Jane Doe received notice by email that her Snapchat account had been accessed by the user of an iPhone 11. According to information provided by Snapchat, between 7:38 p.m. July 19, 2020, and 12:21 a.m. July 20, 2020, Jane Doe's Snapchat account was accessed by IP addresses assigned to AT&T Wireless. According to public databases, each of these IP addresses was located in the New York, New York, area. At the time, Jane Doe was located in Maryland. Jane Doe then received notice from Snapchat that the email address for her account had been changed to [REDACTED].

49. According to information provided by Google, [REDACTED] was created on June 13, 2020, with a recovery SMS number of [REDACTED] SINGH's AT&T Wireless number.

50. On July 20, 2020, at approximately 6:28 a.m., a Baltimore County employee received an email from the address [REDACTED]. The email read: "PLEASE INVESTIGATE [JANE DOE'S BALTIMORE COUNTY ADDRESS] POSSIBLE BOMB SEND OFFICERS ASAP!!!!DO NOT HAVE ACCESS TO PHONE THIS IS THE ONLY POLICE EMAIL I CAN FIND!!!" At approximately 7:00 a.m., Baltimore County Police responded to Jane Doe's residence.

51. Upon receiving the call for service, Baltimore County police units were dispatched and staged at a nearby area. Multiple police resources including Bomb Squad, and K9 units were placed on stand-by during this incident. Officers determined there was no real threat or hazards at the location and it was determined to be a "swatting" incident.

52. Jane Doe's father advised responding officers that he and his wife were expecting someone to arrive to their house in reference to the "party" that was posted on Instagram. Jane Doe's father stated that neither he, his wife, nor Jane Doe have ever met SINGH. Jane Doe further advised she was in contact with SINGH's mother, in an effort to stop the harassment. Jane Doe believed SINGH was living in New York, but only had a Texas address for him.

53. Baltimore County police contacted the Temple Police Department in Texas and requested an officer to respond to SINGH's known Texas address. Temple officers made contact with SINGH's parents, who stated that SINGH was attending college in New York, however, he was currently not enrolled in school due to the COVID-19 pandemic. SINGH's parents believe their son is homeless and expressed that they were very worried about him.

54. The day after the swatting, July 21, 2020, at approximately 7:40 a.m. hours, Jane Doe received a text message from [REDACTED] stating “you’re getting swatted” and “ur dads SSN [XXX-XX-XXXX].”³ The messages also included images from Jane Doe’s private Snapchat account.

55. The phone number [REDACTED] is owned by TextNow. Beginning at approximately 7:39 a.m. on July 21, 2020, the number was assigned to a user with the registered email address [REDACTED]. The IP address used to register the account was an AT&T Wireless address that, according to open source databases, was located in New York.

56. According to information provided by Google, the [REDACTED] account has an account recovery SMS number of [REDACTED] SINGH’s AT&T Wireless number.

OnUniverse Website

57. At approximately 12:00 pm, on July 25, 2020, Jane Doe received an Instagram direct message from [REDACTED]. The message provided a link to a website at the domain onuniverse.com, a platform for designing websites using mobile devices. The site included images of Jane Doe, including personal images, and the “dox” or personally identifiable information about Jane Doe and her family. The site also included links to image files hosted on the image hosting site Imgur.

58. According to information provided by Imgur, the account used to post the images of Jane Doe, Account ID [REDACTED] was created on May 5, 2018 with the username [REDACTED] and the contact email address [REDACTED].

³ In response to a subpoena seeking subscriber records (and not the content of any communications), TextNow produced copies of the contents of text messages sent by the user. The government is not relying on these records, and is seeking a search warrant out of an abundance of caution. The contents of the messages cited herein were obtained from Jane Doe.

59. According to information provided by Google, the [REDACTED] account was created on February 12, 2016 and the account recovery email is [REDACTED] and the recovery SMS number is [REDACTED], SINGH's AT&T Wireless number.

Murder for Hire Solicitation

60. On October 10, 2020, Jane Doe contacted BCoPD after being made aware of a public group chat on the Telegram messenger app. In the group chat, named [REDACTED] a user with the Telegram identifier "desmond" solicited individuals to "swat Jane Doe," and to rape and decapitate her. A portion of the messages from the group chat follow:

TELEGRAM USER	TIME	MESSAGE
desmond	14:29	I'm gunna kill [Jane Doe]
desmond	14:29	guys anyone want to swat [Jane Doe]
desmond	14:30	[Jane Doe] deserves death
desmond	14:31	I don't like that bitch
desmond	14:32	[in response to message "why did u make multiple instagram account..."] Cuz she's a bitch
desmond	14:40	Who can I pay to break into [Jane Doe] house and rape her
[REDACTED]	14:56	desmond send me the money ill take care of her
desmond	14:56	You got her addy
[REDACTED]	14:56	i still have her dox
desmond	14:56	I want her dead and decapitated
[REDACTED]	14:56	send me the money
desmond	14:56	You will cut her head
[REDACTED]	14:57	and ill make sure she gonna die
desmond	14:57	Let me go get [REDACTED]'s credit card. She my mom
[REDACTED]	14:58	via btc dummy
desmond	17:33	KILL [JANE DOE]

Additional TikTok Harassment and Hacking

61. On July 23, 2020, Jane Doe received a private message via Instagram containing a link to a harassing TikTok video [REDACTED]. According to information provided by TikTok, the video was posted by the account [REDACTED]. The account was created on October 1, 2019, with a subscriber email address of [REDACTED] and a phone number of [REDACTED] SINGH's AT&T Wireless account.

62. On November 24, 2020, Jane Doe informed your affiant that her TikTok account had been hacked the previous day. After her TikTok account was hacked, several photographs of SINGH were uploaded to the account with the caption "omg he's so hot !!!" Jane Doe took screen shots of the pictures as well as the security alerts notifying her that her TikTok account was accessed by an unrecognized iPhone 11 at approximately 1:37 a.m. on November 23, 2020.

Snapchat Accounts

63. According to information provided by Snapchat, the following Snapchat accounts are active, and associated with email addresses used in conjunction with other accounts used to send threatening and harassing messages to Jane Doe:

SNAPCHAT ACCOUNT	EMAIL
[REDACTED]	

LOCATION INFORMATION RELATING TO THE TARGET PHONE

64. Based on the facts set forth in this affidavit, there is probable cause to believe that SINGH has committed the **TARGET OFFENSES**, and this affidavit is filed, in part, in support of a Criminal Complaint and the issuance of a warrant for SINGH's arrest. There is also probable cause to believe that the location information described in Attachment B7 will assist law

enforcement in arresting SINGH, who is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4).

65. In my training and experience, I have learned that AT&T is a company that provides cellular telephone access to the general public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as “tower/face information” or “cell tower/sector records.” Cell-site data identifies the “cell towers” (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the “sector” (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data provides an approximate location of the cellular telephone but is typically less precise than other types of location information, such as E-911 Phase II data or Global Positioning Device (“GPS”) data.

66. Based on my training and experience, I know that AT&T can collect cell-site data about the target phone. I also know that wireless providers such as AT&T typically collect and retain cell-site data pertaining to cellular phones to which they provide service in their normal course of business in order to use this information for various business-related purposes.

67. Based on my training and experience, I know that AT&T also collects per-call measurement data, which AT&T also refers to as the “Network Event Location System” (NELOS). NELOS data estimates the approximate distance of the cellular device from a cellular tower based

on the speed with which signals travel between the device and the tower. This information can be used to estimate an approximate location range that is more precise than typical cell-site data.

68. Based on my training and experience, I know that wireless providers such as AT&T typically collect and retain information about their subscribers in their normal course of business. This information can include basic personal information about the subscriber, such as name and address, and the method(s) of payment (such as credit card account number) provided by the subscriber to pay for wireless telephone service. I also know that wireless providers such as AT&T typically collect and retain information about their subscribers' use of the wireless service, such as records about calls or other communications sent or received by a particular phone and other transactional records, in their normal course of business. In my training and experience, this information may constitute evidence of the crimes under investigation because the information can be used to identify the **TARGET PHONE**'s user or users and may assist in the identification of co-conspirators and/or victims.

CONCLUSION

69. Based on the above described information, I submit that there is probable cause to believe that, between April 18, 2020 and the Present, in the District of Maryland and elsewhere, DESMOND BABLOO SINGH committed the following offenses in violation of the listed statutes, on or about the listed dates:

COUNT	OFFENSE	DATE	SUMMARY
1	Cyberstalking (18 U.S.C. § 2261A(2))	4/18/2020 through 11/24/2020	
2	Intentional Damage to a Protected Computer (18 U.S.C. § 1030(a)(5)(A))	7/19/2020	Hacking of Jane Doe's Snapchat
3	Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1))	7/19/2020	Use of Jane Doe's Snapchat Credentials

COUNT	OFFENSE	DATE	SUMMARY
4	False Information and Hoaxes (18 U.S.C. § 1038(a)(1))	7/20/2020	Swatting of Jane Doe's Residence
5	Murder for Hire (18 U.S.C. § 1958)	10/10/2020	Solicitation of Jane Doe's Murder
6	Intentional Damage to a Protected Computer (18 U.S.C. § 1030(a)(5)(A))	11/24/2020	Hacking of Jane Doe's TikTok
7	Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1))	11/24/2020	Use of Jane Doe's TikTok Credentials

70. I respectfully request that the Court issue a criminal complaint and arrest warrant for SINGH for these offenses.

71. Based on the foregoing information, I have probable cause to believe that contraband, and evidence, fruits, and instrumentalities of violations of the **TARGET OFFENSES**, as set forth herein and in Attachments B1 through B6 are currently located in the **TARGET ACCOUNTS**, more fully described in Attachments A1 through A6. I therefore respectfully request that a search warrant be issued authorizing a search of the **TARGET ACCOUNTS** for the items described above and in Attachments B1 through B6, and authorizing the seizure and examination of any such items found therein.

72. I anticipate executing the warrants to search the **TARGET ACCOUNTS** pursuant to the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), by using the warrants to require those internet service providers to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachments B1 through B6. Upon receipt of that information, government-authorized persons will review that information to locate the items described in Section II of Attachments B1 through B6.

73. Given the facts set forth above, I have probable cause to believe the records described in Attachment B7 will help uncover the location of SINGH, the person to be arrested,

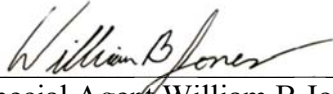
as well as evidence of the aforementioned federal crimes, namely the location of the **TARGET PHONE**.

74. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41.


75. I further request that the Court direct AT&T Corporation to disclose to the government any information described in Section I of Attachment B7 that is within its possession, custody, or control.

76. I further request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to delay notice until 30 days after the collection authorized by the warrant has been completed. There is reasonable cause to believe that providing immediate notification of the warrant may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice to the subscriber or user of the Target Cell Phone would seriously jeopardize the ongoing investigation, as such a disclosure would give that person an opportunity to destroy evidence, change patterns of behavior, notify confederates, and flee from prosecution. *See* 18 U.S.C. § 3103a(b)(1). As further specified in Attachment B, which is incorporated into the warrant, the proposed search warrant does not authorize the seizure of any tangible property. *See* 18 U.S.C. § 3103a(b)(2). Moreover, to the extent that the warrant authorizes the seizure of any wire or electronic communication (as defined in 18 U.S.C. § 2510) or any stored wire or electronic information, there is reasonable necessity for the seizure for the reasons set forth above. *See* 18 U.S.C. § 3103a(b)(2).

77. Because the warrants will be served on the providers of the **TARGET ACCOUNTS**, who will then compile the requested records at a time convenient to them, reasonable cause exists to permit the execution of the requested warrants at any time in the day or night.


Special Agent William B Jones
Homeland Security Investigations

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1, 4(d) and 41(d)(3) this 14 day of December, 2020.


Honorable Thomas M. DiGirolamo
United States Magistrate Judge