

**FILED****UNITED STATES DISTRICT COURT**

for the

Eastern District of California

JUL 23 2013

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY                       
DEPUTY CLERK

United States of America )

v. )

JOLENE CHAN )

Case No. )

213 - MJ - 0222 - KJN

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 November 2011 - July 2013 in the county of Sacramento in the  
Eastern District of California, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

Distribution of Marijuana

21 U.S.C. § 843

Unlawful Use of the Mails

21 U.S.C. §§ 846 and 841(a)(1)

Conspiracy to Distribute Marijuana

31 U.S.C. § 5324(b)(2)

Avoid Currency Transaction Reporting Requirement

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF UNITED STATES POSTAL INSPECTOR ROXANNE LEMAIRE

☒ Continued on the attached sheet.  
Complainant's signature

Postal Inspector Roxanne LeMaire

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/23/2013  
Judge's signatureCity and state: Sacramento, California

Magistrate Judge Kendall J. Newman

Printed name and title

**Affidavit of Postal Inspector Roxanne LeMaire**

I, Roxanne LeMaire, being duly sworn, hereby depose and state:

**Purpose**

1. This Affidavit is made in support of search warrants for:
  - a. **3390 Penryn Road<sup>1</sup>**, Loomis, California, as further described in Attachment A-1, the residence of Matthew Gillum.
  - b. **808 Trimble Drive**, Roseville, California, as further described in Attachment A-2, the residence of Jolene Chan.
2. This Affidavit is also made in support of arrest warrants for:
  - a. **Matthew Luke GILLUM** (Counts 1, 2, 3, 4, and 5)
  - b. **Jolene CHAN** (Counts 1, 2, 3, and 4)

**COUNT ONE:** Distribution of Marijuana, in violation of 21 U.S.C. § 841(a)(1)

**COUNT TWO:** Unlawful Use of the Mails, in violation of 21 U.S.C. § 843

**COUNT THREE:** Conspiracy to Distribute Marijuana, in violation of 21 U.S.C. §§ 846 and 841(a)(1)

**COUNT FOUR:** Avoid Currency Transaction Reporting Requirement, in violation of 31 U.S.C. § 5324(b)(2) (*November 26, 2011 cash transaction*)

**COUNT FIVE:** Avoid Currency Transaction Reporting Requirement, in violation of 31 U.S.C. § 5324(b)(2) (*February 27, 2013 cash transaction*)

**Agent Background**

3. I have been a Postal Inspector since February 2006. I am currently assigned to the Sacramento Domicile, San Francisco Division, of the United States Postal Inspection

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<sup>1</sup> A prior federal search warrant related to this case was executed at 3390 Penryn Road, Loomis, California on March 20, 2013 (2:13-SW-0174-DAD). The results of that search warrant are discussed below.

Service. My current assignment is to investigate the unlawful transportation of contraband, including controlled substances and proceeds of the sale of controlled substances, through the United States Mail. I attended the United States Postal Inspection Service Basic Inspector Training in Potomac, Maryland. Additionally, I have completed a forty-hour Prohibited Mailings Narcotics training program through the United States Postal Inspection Service. Through my training, experience, and interaction with other experienced Postal Inspectors, Task Force Officers, and other drug investigators, I have become familiar with the methods employed by drug traffickers to smuggle, safeguard, store, transport, and distribute drugs; to collect and conceal drug-related proceeds; and to communicate with other participants to accomplish such objectives. I have received specialized training in narcotics investigation matters including, but not limited to, drug interdiction, drug detection, money laundering techniques and schemes, and drug identification from the Postal Inspection Service.

4. I have participated in at least ten investigations targeting individuals and organizations trafficking heroin, cocaine, marijuana, methamphetamine, and other controlled substances. During the course of these ten investigations, I have become familiar with the manner in which drug traffickers use the mail to conduct their illegal operations. I have written at least 200 search warrants related to parcel interdiction efforts.
5. I am a "Federal law enforcement officer" within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant.
6. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

### **Statement of Probable Cause**

#### ***Initiation of the Investigation***

7. In August 2012, an investigation was initiated into multiple Express Mail packages being sent into the Sacramento region which contained large sums of US currency. In September 2012, during a routine review of Express Mail, multiple packages were identified which had been mailed to PO Boxes and addressed to fictitious business names, such as Granite Cove Property Management, American Sound Concepts, B & C Boundry Designs, and Boundless Limits Designs. Through investigation, it was determined that these different PO Boxes were controlled by GILLUM and his associate

BLANKS. GILLUM, BLANKS, and others opened at least fourteen PO Boxes in the greater Sacramento area using fictitious business names. To date, the Postal Inspection Service has identified over 400 Express Mail parcels associated with the GILLUM Drug Trafficking Organization ("GILLUM DTO") which were mailed into the Sacramento region from approximately sixteen different states.

8. In December 2012, a controlled delivery was conducted with a package mailed from Granite Bay, CA to New Jersey. The recipient cooperated with New Jersey Postal Inspectors and provided information regarding the purchase of marijuana on the internet. The recipient provided information that the sales were conducted through the Silk Road website. This website has become a popular clearinghouse for drug transaction due to the anonymous nature of the website. Users of the website have anonymous "handles" or nicknames that they use to interact with other users. Interactions on the website take place via encrypted email. In this particular instance, the New Jersey recipient stated he has been doing business with "sourdiesalman" for approximately six months, and that recently the name had changed to nevertellonme@tormail.org. The recipient stated he mailed \$12,600 to a PO Box in California in exchange for five pounds of marijuana. The recipient confirmed that he mailed the currency via USPS and he always mailed it to a PO Box, with a fictitious business name located in California. The recipient advised that there were three different PO Boxes he had previously mailed to, however, he could only recall one specific address: "Card Collectables, PO Box 288, Orangevale, CA."

***Connection between GILLUM and Post Office Boxes***

9. Wednesday March 20, 2013, law enforcement agents observed BLANKS pick up a United States Postal Service parcel from the Rocklin Post Office. Shortly after exiting the Post Office, BLANKS was approached by law enforcement officers. BLANKS agreed to be interviewed by law enforcement officers. BLANKS was informed that he was not under arrest and that he was free to leave. BLANKS voluntary consented to meet with law enforcement officers.
10. BLANKS told law enforcement officers that he met GILLUM at a party during the summer of 2012. BLANKS told GILLUM that he was out of work and GILLUM offered BLANKS an opportunity to make money. Initially, GILLUM paid BLANKS \$60 per day to pick up postal parcels from various post offices in the Sacramento area. BLANKS opened three post office boxes in his own name. BLANKS was given the keys to other PO Boxes opened in the names of others. Each day, BLANKS checked PO Boxes in Antelope, Citrus Heights, and Folsom. BLANKS stopped checking these PO Boxes after postal inspectors seized parcels bound for these PO Boxes. Subsequently, new PO Boxes were opened by others in fictitious business names. BLANKS then began to travel each



day to three different post offices - Rocklin, Orangevale, and Loomis - and check each of the PO Boxes for parcels. He retrieved the parcels and delivered them to GILLUM.

11. Subsequently, after BLANKS had established a rapport with GILLUM, GILLUM authorized BLANKS to open the parcels. GILLUM gave BLANKS a raise and began paying him \$100 per day. Each of the parcels opened by BLANKS contained cash that had been shipped from various locations in the Midwest and east coast. BLANKS said that the cash often smelled like marijuana.
12. After picking up parcels, BLANKS would return home. BLANKS would open the parcels and count the cash inside the parcels and put it into a safe that BLANKS had in his apartment at 1751 E. Roseville Parkway, Roseville, California. The safe was opened using an electronic keypad. BLANKS stated that GILLUM had a key to BLANKS's apartment and knew the combination to open the safe. GILLUM arrived at BLANKS's apartment at various times and removed the cash from the safe. At other times, BLANKS delivered parcels and cash to GILLUM.
13. BLANKS stated that GILLUM lived at 3390 Penryn Road, Loomis, California. BLANKS delivered cash parcels to GILLUM at the Penryn Road address. On a previous occasion when Blanks made a money delivery to GILLUM at the Penryn Road address, BLANKS observed processed and packaged marijuana inside of the residence.

#### ***Prior Execution of Residential Search Warrants***

14. On March 20, 2013, at approximately 12:59 p.m., law enforcement officers were preparing to execute a federal search warrant (2:13-SW-0152-DAD) at BLANKS's apartment on 1751 E. Roseville Parkway when they observed GILLUM begin to exit from BLANKS's apartment. At the time, GILLUM was carrying a backpack. A subsequent search of the backpack determined that it contained \$8,400 in US currency.
15. On March 20, 2013, a federal search warrant (2:13-SW-174-DAD) was executed on GILLUM's residence at 3390 Penryn Road, Loomis, CA<sup>2</sup>. During the execution of the

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<sup>2</sup> GILLUM was detained during the execution of the search warrant at 1751 E. Roseville Parkway. GILLUM was released from custody prior to the execution of the search warrant at 3390 Penryn Road. Although GILLUM was released from custody in Roseville, GILLUM was subsequently found by law enforcement at 3390 Penryn Road. GILLUM was observed entering the Penryn house approximately three minutes before entry was made. As law enforcement agents approached the residence, GILLUM and two other males came from around the corner of the house with their hands in the air. GILLUM was in a t-shirt and his underwear and his roommate, David Minter, was in jeans with no shirt. While handcuffing Gillum, law enforcement officers noted that GILLUM's underwear were wet and he was asked where his pants were and GILLUM stated he was not answering any questions. Neither GILLUM nor Minter had shoes on and their feet appeared wet and dirty. On the north side of the residence, there is a creek that runs along the side of the house. While searching the creek and the grounds, law enforcement observed fresh foot prints on the ground on the side of the creek bed. Law enforcement officers found two cellular telephones

search warrant, numerous documents were located which discussed mailing parcels, surveillance and counter-surveillance measures, and information related to Silk Road. GILLUM had a list of handle names used on Silk Road, which have been linked through investigation and interviews to GILLUM.

- a. During the execution of the search warrant, numerous documents were located which discussed mailing parcels, surveillance and counter-surveillance measures and surveillance classes, as well as names of who attended the surveillance classes. There was information related to Silk Road website, to include the handle names being used via Tormail network. There was a list of the fictitious business names and PO Boxes information, notes to set up PO Boxes and how to print mailing labels. There were also multiple receipts for jewelry items purchased at Tiffany and Company, which show all items were paid for in cash, including a diamond engagement ring for \$105,887.50.

#### ***BLANKS Interview***

16. On May 8, 2013, the United States entered into a non-prosecution agreement with BLANKS. Under the agreement, the United States will not prosecute BLANKS for conduct committed during the course of his involvement with the GILLUM DTO. In return, BLANKS agreed to fully cooperate in the investigation of the GILLUM DTO.
17. On May 8, 2013, BLANKS was interviewed by law enforcement agents. BLANKS reiterated the information that he had previously provided to law enforcement during his March 20, 2013 statement. Additionally, BLANKS provided further detail regarding his involvement in the GILLUM DTO. BLANKS admitted that the GILLUM DTO is a marijuana trafficking organization. The GILLUM DTO receives orders for marijuana on the Silk Road website. Individuals wishing to purchase drugs would ship money to a PO Box controlled by BLANKS. After receiving the money, the DTO would then ship the desired amount of drugs to the individual purchaser. Blanks reported on average there were 5-6 parcels a day which he picked up. Blanks said there were days where there would be no parcels and days where there would be 10-12 parcels. Blanks stated the average parcel had \$3,000-4,000, but some parcels had \$12,000-\$30,000.

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near the creek, one in good condition and one that had been destroyed. Inside the residence, an empty rifle case and a box of AR-15 magazines were located, yet there were no firearms located. Inside the master bedroom, all the dresser drawer were opened and a jewelry box appeared to have been emptied. During a later interview of BLANKS, BLANKS stated that he observed a text message sent from GILLUM using another DTO member's phone to Minter advising Minter to get rid of everything. Law enforcement agents that executed the search warrant at 3390 Penryn Road believe that GILLUM was in the process of concealing and destroying evidence at the time the search warrant was executed.

18. BLANKS said that his job each day was to retrieve parcels from the various PO Boxes throughout the Sacramento region. Once he returned to his house he would open each parcel. Inside each parcel would be cash and a Silk Road username. Sometimes, the parcels contained notes asking for specific strains of marijuana. After opening all of the parcels, BLANKS would send an email to four encrypted email accounts: theworldisours@tormail.org, wearealltogether@tormail.org, happydude@tormail.org, and nevertellonme@tormail.org. The email would summarize the day's take, specifically noting the Silk Road username and the amount of cash received from that username. BLANKS stated that theworldisours@tormail.org was controlled by GILLUM, wearealltogether@tormail.org was controlled by CHAN, happydude@tormail.org was controlled by another DTO member, and nevertellonme@tormail.org was a group account that a variety of DTO members had access to. After BLANKS was stopped by law enforcement on March 20, 2013, BLANKS deleted all emails to and from his encrypted tormail.org account and believes that other members of the DTO did the same after he told them about being stopped by law enforcement.
19. BLANKS stated that GILLUM organized a surveillance course for members of the DTO. BLANKS stated that one of the purposes of the surveillance course was to monitor BLANKS on his trips to the various post offices to ensure that BLANKS was not being followed by law enforcement. The surveillance course was conducted in December 2012. The surveillance course was a private course set up specifically for members of the GILLUM DTO. The course lasted one week and cost \$13,000. GILLUM gave BLANKS \$13,000 in cash to pay for the course. BLANKS deposited the \$13,000 into his bank account and obtained a cashier's check made out to "Surveillance Ops." A currency transaction report was filed by the bank on BLANKS's account because of the large cash transaction. BLANKS said that GILLUM, CHAN, and five others participated in the course. The course was taught by "Ricky." In January 2013, GILLUM organized another private course, this time focused on "counter-surveillance." The same individuals attended the second course with the addition of two more DTO members.
20. BLANKS stated that GILLUM concocted a cover story that all of the participants were to adhere to during the training course. Pursuant to the cover story, all of the DTO members were supposed to be employees of IT firm that protected companies from hackers.
21. BLANKS stated that he did not communicate directly with GILLUM after he was stopped by law enforcement on March 20, 2013. Instead, BLANKS communicated with GILLUM through another member of the DTO. BLANKS learned from the DTO member that after GILLUM was detained on March 20, 2013, GILLUM immediately alerted all members of the DTO that he had been detained and that GILLUM's house had been searched by law enforcement.



22. BLANKS stated that he was responsible for updating the software used by the DTO on a weekly basis. When BLANKS updated the software on the USB drive used by CHAN, he saw a mailing label template. BLANKS also stated he saw trash bags full of marijuana at CHAN's residence.

***GILLUM's Use of Email***

23. Documentation seized during the search warrants and subsequent investigation determined that GILLUM was using at least two separate email accounts: mattland2006@yahoo.com and mattlandforever@gmail.com.
24. Business registration documents indicated that GILLUM used both the mattland2006@yahoo.com and the mattlandforever@gmail.com addresses to setup a business named, "Environmental Impact Solutions, Inc." Based upon my training and experience, I know that individuals trafficking controlled substances or proceeds from controlled substances will often use fictitious names in an effort to remain anonymous.
25. During this investigation, law enforcement have identified at least ten separate fictitious business names that have been used by GILLUM and members of the GILLUM DTO for the purposes of disguising the names and identities of people shipping and receiving parcels through the United States mail.
26. Interdiction of parcels associated with GILLUM and bearing fictitious business names have resulted in the seizure of over \$200,000 in cash.
27. On April 11, 2013, federal search warrants were authorized for GILLUM's mattlandforever@gmail.com (2:13-SW-0233-EFB) and mattland2006@yahoo.com (2:13-SW-0234-EFB) email accounts. On April 16, 2013, Yahoo sent a compact disc which contained over 7,000 emails related to email account mattland2006@yahoo.com. On May 16, 2013, Google sent a compact disc which contained over 200 emails related to account mattlandforever@gmail.com.

***GILLUM's mattland2006@yahoo.com Email Account***

28. Upon reviewing the emails related to account mattland2006@yahoo.com seized pursuant to the search warrant, investigators discovered that there were emails from a UPS Store, located at 2351 Sunset Blvd Ste 170, Rocklin, CA 95765 regarding twenty-seven additional, previously unknown, Express Mail parcels GILLUM received at a mailbox at the UPS Store. Included within these emails from the UPS store were tracking numbers for UPS and USPS parcels received. These emails were dated between August 2, 2011



and June 2, 2012. A July 2, 2012 email indicated that the mailbox service agreement had expired.

29. On July 2, 2011, GILLUM received the following email that reflected an exchange on Facebook between GILLUM and Joe Hildreth:

**Subject:** Joe Hildreth sent you a message on Facebook...  
**From:** "Facebook" <fbmessage+2ja\_c626@facebookmail.com>  
**Date:** Sat, 2 Jul 2011 21:23:51 -0700  
**To:** Matt Gillum <mattland2006@yahoo.com>



**Joe Hildreth**

340 parallel ave Pittsburgh PA 15210 sorry i lost my Internet but I'm still down if u are

Conversation History



**Matt Gillum**

4:03pm Apr 1

ok what is your address



**Joe Hildreth**

8:44am Apr 1

Surprise me



**Matt Gillum**

12:40pm Mar 31

ok so how about 1 a week or as long as it takes you. I can get you top quality stuff for 21-32. what are your favorite strains.



**Joe Hildreth**

5:23am Mar 31

3pds in 1 mth



**Matt Gillum**

10:49am Mar 27

Ya I know you live across the country bro its not like I could sell weed in cali. Everyone grows it here. If I know what you want I can have it dropped for you

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30. On August 21, 2012, GILLUM received the following order confirmation email related to the purchase of a vacuum sealer and vacuum bags for \$1,196.82:

**Subject:** WestonSupply.com Order Confirmation  
**From:** support@westonproducts.com  
**Date:** 21 Aug 2012 11:09:43 -0700  
**To:** mattland2006@yahoo.com

		FOLLOW US:	CustomerID# 14799
		    	
<p>Thank you for your order. Your order number is 15795, placed 08/21/2012 at 02:08PM.</p>			
<b>Bill To:</b> Matthew Gillum 15855 Mc Elroy RD Meadow Vista, CA 95722 US 9162244485 mattland2006@yahoo.com		<b>Ship To:</b> Matthew Gillum 5340 Parkford Circle Granite Bay, CA 95746 US 9162244485	
<b>Payment Info:</b> <b>Credit Card:</b> Visa Matthew Gillum *****4833		<b>Shipping Method:</b> UPS Ground	
<b>Order Details:</b>			
<b>Code</b>	<b>Item</b>	<b>Qty Price</b>	<b>Grand Total</b>
65-0101	Weston Vacuum Sealer - PRO 2100 (White)	1 \$409.99	\$409.99
30-0008-W	Commercial Grade Vacuum Bags - 8 in x 50 ft Roll	1 \$0.00	\$0.00
30-0015-W	Commercial Grade Vacuum Bags - 15 in x 50 ft Roll	25 \$27.99	\$699.75
			Subtotal: \$1,109.74
			Tax: \$0.00
			Shipping Cost: \$87.08
			Grand Total: \$1,196.82
<p>Thank you for shopping at WestonSupply.com! Visit us again at <a href="http://www.westonsupply.com/">http://www.westonsupply.com/</a></p>			

31. Based on my training and experience, I know that individuals shipping controlled substances through the mail often use vacuum-sealed bags in an attempt to prevent the escape of odors associated with the controlled substance to avoid detection by law enforcement.

***GILLUM's mattlandforever@gmail.com Email Account***

32. On June 27, 2011, GILLUM received an email from peterstricklandco@gmail.com. The subject line of the email was "early" and the text of the email read only "1000." Attached to the email were three photographs of processed marijuana. Below is one of the photographs that appears to show processed marijuana in a plastic bag.



***Surveillance and Counter-Surveillance Courses***

33. On November 3, 2012, GILLUM (at his mattlandforever@gmail.com account) received an email from Ricky Ansbro (ricky@surveillanceops.com). The email included a price quote. The "5 Day Basic S3 Course" was listed at \$1400 per student and included "mobile surveillance techniques" and "the use and identification of Counter Surveillance." The "10 Day Advanced S3 Course" was listed at \$3400 per student and included "Develop and perfect the use of Cover Stories, Cover for Action," and "Learn and utilize disguise changes."
- a. On November 17, 2012, GILLUM sent an email to Ansbro laying out a cover story that GILLUM appears to have created as a pretext for taking the course. Additionally, GILLUM described to Ansbro the individuals that would be participating in the surveillance course. BLANKS was described as a "hacker"

who would "determine the origin of the network breach." CHAN was described as a member of the "surveillance team." GILLUM was the "CEO."

- b. On December 4, 2012, GILLUM forwarded the November 17, 2012 cover story email to CHAN (embracelovexoxo@gmail.com), BLANKS (graysonblanks@hotmail.com), and other DTO members. GILLUM introduced the email by writing: "This is what I told our instructor for our cover story so please go over it and become familiar with it so we don't blow our cover."
- c. On January 22, 2013, GILLUM forwarded a January 23-27 surveillance course syllabus to CHAN, BLANKS, and other DTO members. The body of the email read: "Hey everyone here is the course syllabus for the class that we are starting tomorrow. The address of where we are meeting is on the last page."
  - i. On January 22, 2013, at 11:23 a.m., GILLUM sent separate text messages to CHAN, BLANKS, and three other DTO members. Each text message read: "I sent the syllabus out to your normal emails."
  - ii. Based on my training and experience and the interviews with BLANKS, I believe that GILLUM's statement that he sent the syllabus to their "normal emails" is to distinguish between the encrypted tormail.org accounts that the GILLUM DTO uses for overtly drug trafficking related email activity.

***Purchase of Tiffany & Co. Jewelry***

- 34. I interviewed Tiffany & Co. employee Matt Robusto regarding jewelry purchased by GILLUM at Tiffany & Co. Robusto stated he was the sales associate who sold GILLUM three rings. He is also aware that GILLUM had purchased at least one other item of jewelry from a different sales associate in the past.
- 35. Robusto reported he first met GILLUM in late 2011, but only knew GILLUM by his first name, "Matt." On November 26, 2011, GILLUM came to Tiffany's & Co. stating he was looking for a promise ring for his pregnant girlfriend. Robusto advised that he showed GILLUM several rings and GILLUM picked out a ring close to \$16,000. Robusto stated GILLUM asked if he had to provide his personal information for the purchase of the ring if he purchased with cash. GILLUM was advised he would need to provide the information for such a sale. GILLUM told Robusto he would return with the money and another person to complete the form.



36. Robusto stated GILLUM returned with \$16,000 in 100 dollar bills, and the first count was conducted in the office on the sales room floor, then the money was sent to the back for the second count. During the second count, Robusto stated an Asian female, Jolene CHAN, arrived at the store to complete the information needed for the IRS Form 8300 currency reporting form. Once the form was complete, Robusto stated GILLUM paid CHAN \$100 and CHAN left the store. Shortly after CHAN exited, the second count was completed and the ring was wrapped and given to GILLUM. He then left the store.
37. On February 27, 2013, GILLUM purchased another diamond ring from Tiffany and Co. for \$105,887.50 in cash. Because the transaction involved more than \$10,000 in cash, Tiffany and Co. again required GILLUM to fill out an IRS Form 8300 currency transaction report. No Form 8300 was filled under GILLUM's name. Instead, GILLUM again used a nominee to fill out the paperwork. GILLUM paid for the ring using 100 dollar bills that were contained within a paper bag, however, the IRS Form 8300 for the purchase was filled out in the name of Allison Cullen.
38. On April 30, 2013, Allison Cullen was interviewed regarding the purchase of a diamond ring at Tiffany and Co. and the IRS Form 8300 which was completed with Cullen's identifying information. Cullen admitted she met with GILLUM at Tiffany & Co. in the Roseville Galleria Mall, while he was purchasing an engagement ring for his girlfriend, Brittany Woo. Cullen claimed GILLUM sent her a text message requesting that she meet him at Tiffany & Co. Cullen stated she completed paperwork at Tiffany & Co., but claimed that she thought the paperwork was for Tiffany & Co. VIP and perks program. Cullen stated she was asked her name, address, and her social security number for the paperwork.
39. Cullen was shown a copy of the receipt she signed and admitted it was her signature. Cullen reported she did not look at the receipt when she signed it and was not aware of the purchase price, (\$105,887.50), she just knew there was a lot of cash. Cullen admitted GILLUM paid her \$100 to complete the IRS Form 8300 for the purchase of the engagement ring.

***Cullen Interview***

40. Cullen stated that she was friends with CHAN. Cullen reported that CHAN admitted to working for GILLUM and that CHAN packaged and shipped marijuana. During visits to CHAN's apartment<sup>3</sup>, Cullen saw packaged marijuana. CHAN also brought Cullen to a separate apartment rented by GILLUM, that was used to process and package marijuana. Cullen did not remember the address of GILLUM's apartment<sup>4</sup>. Cullen is not sure of the

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<sup>3</sup> The apartment referred to here is a prior residence used by CHAN, not 808 Trimble Drive.

<sup>4</sup> The apartment referred to here is a prior apartment used by GILLUM that has since been vacated.

amount of marijuana she saw, but said it appeared to be pounds of marijuana, not just small amounts. Cullen stated the marijuana was packaged in vacuum-sealed bags or in large plastic storage containers. Cullen stated the marijuana was packaged in vacuum-sealed bags and placed in a box, which was inside the mailing box, or mailed inside the plastic container.

41. CHAN told Cullen that CHAN's job was mailing parcels via United States Postal Service. Cullen admitted to being with CHAN on several occasions while CHAN mailed parcels. Cullen said CHAN stated the orders were always conducted through a website, but they did not discuss which website. Cullen claimed she has never heard of Silk Road. Cullen reported CHAN mailed parcels from the Orangevale Post Office. Cullen stated the parcels she observed being mailed were sent via Priority Mail and they were addressed to east coast addresses.
42. Eventually, CHAN asked Cullen if Cullen wanted to do the same thing CHAN did to make money. Cullen accepted the offer and began working for CHAN. Cullen stated she mailed parcels for approximately six-to-eight weeks, and would mail parcels three times a week, most the time she mailed two parcels at once. Cullen stated that CHAN paid Cullen \$400 a week to mail parcels. Cullen reported CHAN always had cash on hand, and CHAN always paid when they went to dinner and did other activities. Cullen stated CHAN would provide the parcel to be mailed to Cullen. Prior to receiving the box, marijuana would already be packed in the box and the shipping information completed. CHAN provided the money to pay for the postage, which Cullen stated ranged anywhere from \$30.00 to \$100.00. Cullen admitted she assisted in packaging the marijuana one time, at GILLUM's apartment, but stated she was not good at it, so they did not request her assistance again.

#### ***Recent Surveillance***

43. On June 11, 2013, law enforcement conducted surveillance at the residence at 3390 Penryn Road. Law enforcement observed GILLUM at the residence and then observed GILLUM leave the residence in a black Toyota Tundra. On July 22, 2013, law enforcement conducted surveillance of the residence and observed the same vehicles parked at the residence as on June 11, 2013.
44. On July 20, 2013, law enforcement surveillance confirmed that CHAN spent the night at 808 Trimble Way.

## **Training and Experience**

### ***Narcotics Trafficking***

45. Based on my training and experience I know that narcotics traffickers frequently own, maintain, and/or use automobiles under their control to transport their narcotics and/or drug proceeds to locations from which they conduct their trafficking operations. I know they will often use these vehicles to deliver quantities of narcotics and/or drug proceeds to other persons involved with the scheme of mailing narcotics and receiving drug proceeds through the United States Mail.
46. Based on my training and experience, I know that persons involved in narcotics trafficking must involve themselves in a conspiratorial scheme involving many persons, from the source of drug supply through sub-distributors to the ultimate consumer. Therefore, I know that members involved with the mailing of narcotics and/or drug proceeds will maintain, at their residences and businesses, personal accounting records of money that they owe for the purchases of these above mentioned narcotics and that which is owed to them from the illicit sales of these narcotics. Narcotics traffickers often provide these narcotics to their customers and "runners/couriers" on credit and they will keep accurate accounting records indicating the people who owe them money for this above mentioned narcotics. These records are commonly called "pay/owe" sheets. Additionally, I know that narcotics traffickers will maintain at their residences documents listing the other members of the DTO and that those documents will include telephone records, personal address books, personal correspondence and photographs depicting members of the DTO, and recordation of narcotics sales listing members of the DTO.
47. Based on my training and experience, I know that persons who sell narcotics purchase it in bulk quantities, and often maintain their supply at their residence as inventory for their customers. The seller then weighs out smaller amounts using a scale or other accurate measuring device. The seller then places these smaller amounts into plastic baggies, plastic packets, vacuum-sealed bags, or other containers that the narcotics trafficker eventually resells for profit. The narcotics trafficker does this process in the privacy of his own home and/or other secure locations to prevent being detected by law enforcement officers/Agents and/or to prevent robbery to rival DTOs.
48. Based on my training and experience, I know that narcotics traffickers often possess firearms such as handguns, short-barreled shotguns and various types of assault rifles, and other weapons to protect their narcotics supply and illegally obtained currency from rival narcotics traffickers and narcotics users.

49. Based on my training and experience, I know that narcotics traffickers often use computers and other electronic storage devices to store information related to their drug trafficking activities, including: pay/owe sheets, lists of suppliers, lists of buyers, and information related to other individuals involved in the drug trafficking activities.
50. Based on my training and experience, I know that persons who reside or are staying in a particular residence will often have in that residence documents or indicia which list their name and address. Documents such as personal telephone, address books, utility company receipts, keys, personal letters, and other articles of personal property would tend to establish residency. I know from experience that these residences also can provide evidence of child endangerment, by having narcotics, firearms, and paraphernalia present and accessible to children.
51. I have investigated a number of narcotics traffickers. I know that it requires an organized hierarchy of both superiors and subordinates to traffic. I know that persons who traffic narcotics often maintain one or more residences solely to accommodate the sales of narcotics. The narcotics trafficker will attempt to minimize the amount of people who know the locations of these houses and/or apartments units. Commonly the narcotics trafficker will utilize one of the houses and/or apartments to accommodate the sale of these described narcotics to his/her customers and the other residences will be utilized as a safe house location for the bulk quantity of his/her narcotics in addition to the larger quantities of profits the trafficker receives from he/her illicit trafficking of these narcotics. This method of operation will prevent the seizure of the large amounts of their narcotics and profits of the sales in the event the primary residence is entered and searched by law enforcement.
52. Based on my training and experience I know that narcotics traffickers utilize their cellular and landline phones in residences to facilitate their narcotics trafficking. Therefore, I believe that any incoming telephone calls received while executing this search warrant will involve drug transactions and will disclose negotiations in language as it being sought in this Affidavit. I request that this search warrant authorize the interception and/or recording of incoming telephone calls during the service of this search warrant as I believe many of these calls will be prospective customers attempting to place orders for marijuana. I believe these calls will constitute evidence of persons involved in the trafficking of the above mentioned narcotics.
53. Based on my training and experience, I believe that the listed paraphernalia (see Attachment B) is used in the illegal preparation, packaging, and sale of marijuana. It is my experience that the proceeds from illegal narcotics transactions are commonly retained on the premises, rather than deposited elsewhere, and thus, I request that the



search warrant additionally issue for all occupants discovered on the premises during the service of this warrant and all wallets, purses, billfolds, moveable or stationary banks or safes, any storage areas connected to the residence or any other receptacles where money or contraband may be hidden.

54. Based on my training and experience and the information supplied in this affidavit, it is my expert opinion that the items described in Attachment B, are currently located at the above designated premises, and, on the persons, or in the vehicles described herein.

### ***Money Laundering***

55. Based on conversations with other law enforcement officer and on my training and experience I am familiar with the methods and practices used by individuals and organizations involved in illicit activities that generate large amounts of income. The methods and schemes used by these individuals to dispose of the currency are collectively called money laundering. I am familiar with the methods and practices used by individuals and organizations involved in illicit activities that generate large amounts of income. These methods include cash purchases, conducting cash transactions in amounts less than \$10,000 to avoid reporting requirements, the use of aliases and nominees, the use of businesses as "fronts" in an attempt to legitimize and conceal their activities, the use of wire remitter companies to convert currency into wire transfers below reporting requirements, the use of money orders and cashier's checks to avoid depositing currency into bank accounts, structuring transactions to avoid currency reporting forms, the use of "off-shore" banking in an attempt to break the paper trail and the use of bank safe deposit boxes to conceal and secure their proceeds, to name but a few of the methods.
56. I have also had extensive experience in debriefing defendants, participant witnesses, informants, and other persons who have personal experience and knowledge of the amassing, converting, transporting, distributing and concealing the proceeds from illegal activities.
57. From my background and experience I know that individuals, including persons engaged in illicit activities, such as narcotics trafficking and/or money laundering, normally maintain records of their financial activity, such as receipts for expenditures by cash and check, bank records, tax returns, escrow files and other financial documents, in their personal residences, place of business, rented storage units, vehicles, or other places under their control. These records may be in the form of written notes and correspondence, receipts, negotiated instruments, contracts, bank records, tax documents and other records. Furthermore, individuals engaged in an income-producing business

keep records of the financial activities of the business for numerous reasons and often use accountants to complete financial statements and tax returns for their business and personal tax returns.

58. From my background and experience I know that individuals, including persons engaged in illicit activities and/or money laundering, often maintain such records for long periods of time, particularly when they are involved in ongoing criminal conduct over a long period of time. Based on my experience and review of *United States v. Greany*, 929 F.2d 523 (9th Cir. 1991), where there is a long-term or ongoing criminal business or where the evidence is of a nature that would be kept long after the criminal activity has ceased (e.g., financial records), the passage of long periods of time will not make the evidence supporting the issuance of a warrant stale.
59. There are many reasons why individuals, including criminal offenders, maintain evidence for long periods of time. The evidence may be necessary business records which must be kept for information reporting purposes, such as for state and Federal tax returns, loan applications, to produce profit-and-loss statements and balance sheets and for "parent" company reporting. The evidence may also be innocuous at first glance (e.g., financial, credit card and banking documents, travel documents, receipts, documents reflecting purchases of assets, personal calendars, telephone and address directories, check books, videotapes and photographs, utility records, ownership records, letters and notes, tax returns and financial records, escrow files, telephone and pager bills, keys to safe deposit boxes, packaging materials) but have significance and relevance when considered in light of other evidence. The individual, including the criminal offender, may no longer realize he/she still possesses the evidence or may believe law enforcement could not obtain a search warrant to seize the evidence.
60. Your affiant is aware that the proceeds generated from both legal and illegal activities may be spent many years after the activity has stopped. Thus, records reflecting income and expenditures for the time period spanning the activity and those years immediately following the end of this activity are essential to any financial investigation.
61. Often, the method of distribution generates records of events as well. These records can be in the form of bills of lading, contracts, air waybills, delivery receipts, billings, manifests, log books, fuel receipts, motel/hotel receipts, travel records, credit card charges and other related business documents.
62. Individuals who amass proceeds from illegal activities routinely attempt to further that conduct and/or conceal the existence and source of their funds by engaging in financial transactions with domestic and foreign institutions, and others, through all manner of

financial instruments, including cash, cashier's checks, money drafts, traveler's checks, wire transfers, money orders, etc. Records of such instruments are routinely maintained at the individual's residence or place of business.

63. The net worth/source and application of funds analyses show that a person's known expenditures and/or accumulation of assets substantially exceed his/her legitimate or reported sources of income to prove that the person is engaged in either illegal or unreported money generating activities, such as narcotics trafficking or unreported business sales. The net worth analysis compares an individual's net worth (cost value of total assets minus total liabilities) at a time just before he/she has commenced his/her purported criminal or unreported enterprise, to his/her net worth at the approximate time of his/her arrest. The source and application of funds analysis focuses on an individual's expenditures during the time period of the purported illegal or unreported income generating activities and compares such expenditures with his legitimate or reported sources of income. Both analyses require evaluation of bank records, credit records, loan records, escrow files, documents evidencing ownership of assets, and other documents evidencing the financial profile of the individual during the course of the purported illegal or unreported income generating activity, as well as a short time period prior to the illegal or unreported activity (e.g., one year). Other than assisting in the net worth/source and application of funds analyses, a financial profile of an individual prior to the purported criminal or unreported income generating activity evidences changes in lifestyle, asset accumulation, and expenditures between the time period prior to the illegal or unreported activity and the time period of the illegal or unreported activity that are consistent with a person generating income from illegal or unreported income generating activities (e.g., narcotics trafficking, real estate investing), as compared to a person earning income from legitimate or reported sources. Evidence of an individual's expenditures, asset accumulation, financial life-style, net worth/source and application of funds analyses, and underlying financial documents necessary for such analyses are admissible evidence under Federal case law in narcotic trafficking and money laundering cases. Thus the need for such documents to be taken during the execution of a search warrant.

#### ***Computers and Electronic Storage***

64. As described above and in Attachments B, this Affidavit and Application seeks permission to search and seize records that might be found on the premises, in whatever form they are found. I submit that if a computer or electronic medium is found on the premises, there is probable cause to believe those records will be stored in that computer or electronic media, for at least the following reasons:



- a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a hard drive, deleted or viewed via the Internet. Electronic files downloaded to a hard drive can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using readily-available forensics tools. This is so because when a person "deletes" a file on a home computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data.
  - b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space-that is, in space on the hard drive that is not currently being used by an active file-for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a "swap" or "recovery" file.
65. In this case, the warrant application requests permission to search and seize computers and electronic information storage for information related to the use of the computer to facilitate drug trafficking via the Silk Road website; information related to the purchase, tracking, and receipt of United States Postal Service mail parcels; information related to communication between GILLUM, CHAN, BLANKS, and others – including sources of drug supply, co-conspirators, and narcotics customers. These things constitute both evidence of crime, contraband, and facilitating property. This Affidavit also requests permission to seize the computer hardware that may contain those things if it becomes necessary for reasons of practicality to remove the hardware and conduct a search off-site.
66. Based upon my knowledge, training and experience, I know that searching for information stored in computers often requires agents to seize most or all electronic storage devices to be searched later by a qualified computer expert in a laboratory or other controlled environment. This is often necessary to ensure the accuracy and completeness of such data, and to prevent the loss of the data either from accidental or intentional destruction. Additionally, to properly examine those storage devices in a laboratory setting, it is often necessary that some computer equipment, peripherals, instructions, and software be seized and examined in the laboratory setting.
67. Searching computer systems for the evidence described in Attachment B may require a range of data analysis techniques. In some cases, it is possible for agents to conduct carefully targeted searches that can locate evidence without requiring a time-consuming manual search through unrelated materials that may be commingled with criminal evidence. In other cases, however, such techniques may not yield the evidence described



in the warrant. Criminals can mislabel or hide files and directories, encode communications to avoid using key words, attempt to delete files to evade detection, or take other steps designed to frustrate law enforcement searches for information. These steps may require agents to conduct more extensive searches, such as scanning areas of the disk not allocated to listed files, or peruse every file briefly to determine whether it falls within the scope of the warrant. In light of these difficulties, your affiant intends to use whatever data analysis techniques appear necessary to locate and retrieve the evidence described in Attachment B.

### ***Forensic Computer Evidence***

68. As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic evidence that establishes how computers were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any electronic storage medium in the because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.
- b. Forensic evidence on a computer or storage medium can also indicate who has used or controlled the computer or storage medium. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, registry information, configuration files, user profiles, e-mail, e-mail address books, “chat,” instant messaging logs, photographs, the presence or absence of malware, and correspondence (and the data associated with the foregoing, such as file creation and last-accessed dates) may be evidence of who used or controlled the computer or storage medium at a relevant time.

- c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a computer was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.
- f. I know that when an individual uses a computer to conduct narcotics transactions over the internet, the individual's computer will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain: data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.

### *Nature of Computer Examination*

69. Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or otherwise copying storage media that reasonably appear to contain some or all of the evidence described in the warrant, and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted scans

of the entire medium, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.


### **Request to Seal**

70. This Affidavit contains information regarding potential targets, which if unsealed may jeopardize the very information sought to be gained by these search warrants and arrest warrants. In light of the on-going nature of the investigation, and the likelihood that notice to GILLUM or CHAN or GILLUM DTO members may cause them to destroy evidence, flee from prosecution, and notify confederates, your Affiant requests that this Affidavit and the resulting Search Warrants and Arrest Warrants be sealed on the Court's docketing system, with the exception of copies utilized by law enforcement officers participating in the investigation and a copy of the Search Warrant and an inventory of any items seized that will be left at the locations of the execution of the Search Warrants.

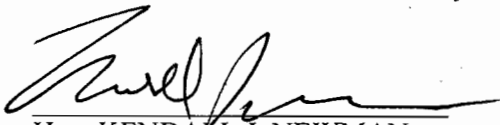
### **Conclusion**

71. I hereby request that search warrants be issued based upon the aforementioned facts, commanding the immediate search of the persons, premises and vehicles above designated for the property or things above described and that such property. And that arrest warrants be issued for GILLUM and CHAN.

I swear, under the penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

  
ROXANNE LeMAIRE  
United States Postal Inspector

Sworn and Subscribed to me on July 23, 2013,

  
Hon. KENDALL J. NEWMAN  
United States Magistrate Judge

Approved as to form:

  
JUSTIN L. LEE  
Assistant United States Attorney

**Attachment A-1**

*Location to be Searched: 3390 Penryn Road, Loomis, California*

The premises to be searched is 3390 Penryn Road, Loomis CA, which is located within a small gated residential area on the south side of Penryn Road east of Interstate 80 in Loomis California. A decorative rock structure outside the perimeter gate contains three of the residential mail boxes, one of which indicates "3 3 9 0." The residence to be searched is at the far southwest end of the only driveway leading into the property. The single family, single-story wood-panel-sided residence is beige in color with white trim and a brown composite roof. A secondary matching guest-home type residence is located to the west of the residence. Both structures face the southwest.

This search warrant authorizes the search of the main residential structure, the secondary guest home, and all vehicles and persons found on the property. Also to be searched are any outbuildings, curtilage, garages, sheds, or storage locations associated with this property.

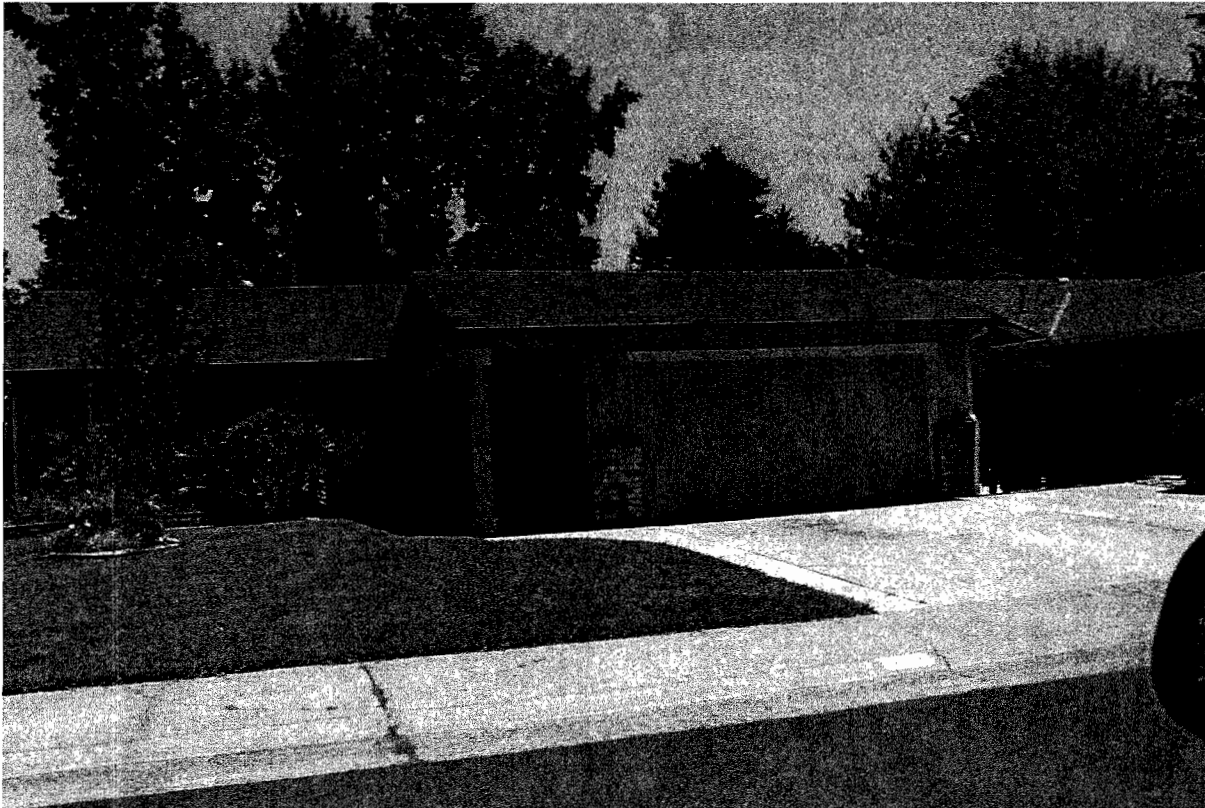




**Attachment A-2**

*Location to be Searched: 808 Trimble Way, Roseville, California*

The premises to be searched: is located on the east side of Trimble Way, south of Coloma Way in Roseville, CA. The single-family, single-story residence is a wood-sided house painted yellow with a three foot brick facade, white trim, and a black composite shingle roof. The front of the residence and the front door face west with the attached garage to the south end of the house. The numbers "8 0 8" are gold in color on the north west corner of the garage and face the street.



**Attachment B**

*Items to be Seized*

1. Marijuana in various forms, including growing plants, harvested plants or stalks, or drying, dried, or processed marijuana.
2. Equipment and tools associated with and used for the cultivation (both indoors and out), use, storage, transportation, processing, protection or distribution of marijuana, such as:
  - a. Irrigation devices, garden hoses, water buckets, five gallon buckets, ground timing devices, electronic watering devices, aerators, PVC pipe, water storage drums, water tanks, hose filter fittings, valves, water pumps, lights, timers, power packs, generators, ballasts, power cords, extension cords, generators, air conditioning units, fans, heat pumps, shovels, rakes, brush clearing equipment, handsaws, pruning shears, hand-held sprayers, in-line fertilizer/water tanks, herbicides, starter pots, planter pots, grow pots, alligator clips, baggies, rolling papers, cigarette packs, small medicine containers, glass and plastic vials, rolled up papers for holding seeds, sifters, scales and other weighing devices, compression devices, drying screens, paper bags, pouches, backpacks, burlap bags, plastic storage containers, boxes, chests, coolers, storage trailers, together with the receipts for these items;
  - b. Books and/or magazines for growing marijuana, such as: High Times, Marijuana Growers Guides, Sinsemillia Tips, Marijuana Potency, Marijuana Botany, Marijuana, and other marijuana publications.
3. Cocaine, bath salts, or any other controlled substances and/or contraband.
4. Items tending to identify the location where controlled substances and other evidence of narcotics trafficking may be found, to include records and keys for vehicles, storage facilities, residences, businesses, post office boxes and safe deposit boxes.
5. United States Postal Service express mail or priority mail packages or packaging material. Any information, documentation, or packaging related to the sending or receiving of parcels through the United States Postal Service or any other freight shipper, including UPS, FedEx, and DHL.
6. United States and foreign currency over \$1,000.

- a. Items used in the packaging of currency for consolidation and transportation, such as large quantities of rubber bands, currency wrappers or bands, duct or wrapping tape, plastic sealing machines, and money counting machines.
7. Items in excess of \$2,000.00 in value tending to establish substantial income from narcotics trafficking, to include money orders, cashier's checks, certified checks, gold, silver, jewels, negotiable securities, certificates of deposit, documents evidencing the purchase of expensive assets, real property, bank statements, canceled checks, credit card statements, business records, which includes general ledgers, general journals, cash receipts and disbursement journals, sales journals or other books of account, receipts, and other items evidencing the obtaining, secreting transfer, concealment and expenditures of large sums of currency.
8. Narcotics or money ledgers, narcotics distribution or customer lists, narcotics supplier lists, correspondence, notation logs, receipts, journals, books, pay and owe sheets, records and other documents noting the price, quantity, date and/or times when narcotics were purchased, possessed, transferred, distributed, sold or concealed.
9. Cellular telephones, digital media devices, answering machines and tapes, and other communication devices.
10. Personal telephone and address books and listings, letters, cables, telegrams, telephone bills, photographs, film, undeveloped film, audio and video tapes, personal notes and other items reflecting names, addresses, telephone numbers, communications, with associates in narcotic trafficking activities, all incoming telephone calls – (searching officers are allowed to answer the phone, without revealing their true identity, and converse with callers who appear to be calling in regard to the conspiracy).
11. Items evidencing the receipt of income from any source including Forms W-2, 1098 and 1099, Federal and state income tax records and work papers, employment records, pay stubs, social security statements, business receipts, business books and records, journals and ledgers, receipts, invoices, sales of assets, real estate sale and purchase records, escrow records, brokerage records, investment account statements, stock certificates, receipts documenting purchase and sale of stocks, contracts, purchase orders, estate records, loan records, letters of credit, notes payable and receivable, IOU's and other recordation of debts comprising evidence of loans and expenses, checks, passbooks and deposit receipts, check registers and checkbooks, insurance documents, money orders, cashier's checks, bank and money drafts, wire transfer records, bank statements and account records, safety deposit keys and records, money wrappers, money containers, copies of any Currency Transaction Reports (CTRs), bank notification requirements for



CTRs, schedules of currency activities, published reference material on the subject of money laundering.

12. Items evidencing the obtaining, secreting, transfer, and/or concealment of assets and the obtaining, secreting, transfer, concealment and/or expenditure of money to include business books and records, invoices, receipts, records of real estate or securities transactions, escrow files, vehicle and vessel purchase records, loan statements, records reflecting the purchase of assets.
13. Items relating to loans and the obtaining of funds from lending institutions or private parties including loan applications, credit reports, verification of rental status documents, correspondence to or from lending institutions, occupancy documents, verification of employment documents, accountant verification documents, income verification documents.
14. Items evidencing any landlord-tenant or leaser-leaseholder relationship including rental or lease applications, "walk through" documents, receipt books, rental ledgers, property descriptions, documents relating to rental income and expenses, landlord books, correspondence, credit reports, eviction records.
15. Records, items, and documents reflecting travel for the purpose of participating in narcotics trafficking, including airline tickets, credit card receipts, travel vouchers, hotel and restaurant receipts, canceled checks, maps and written directions to locations.
16. Personal calendars, diaries, address and/or telephone books and listings, rolodex indices and papers reflecting names, addresses, telephone numbers, pager numbers, fax numbers and/or telex numbers, telephone bills, cellular telephones, correspondence of the subjects of the investigation and their criminal associates, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists;
17. Handguns, shotguns, rifles, explosives, and other firearms/incendiary devices and ammunition.
18. Computers, software, peripheral data storage devices, routers, modems, and network equipment used to connect computers to the Internet, that contain information related to the above listed items, and all other equipment/material/programs needed to review the contents of the computer. Law enforcement shall be allowed to take the computer and related material for off-site inspection and allowed 120 days from the day of the search to image or copy the computer or related material. Thereafter, law enforcement officials



shall be able to access such image or copy as they would any other item of seized evidence without time limitation.

- a. As used above, the terms "records" and "information" includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).
- b. The term "computer" includes all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook computers, mobile phones, tablets, server computers, and network hardware.
- c. The term "storage medium" includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.