

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

IN THE MATTER OF THE )  
SEARCH WARRANT FOR )  
PROPERTY LOCATED IN THE )  
LINCOLN POLICE )  
DEPARTMENT PROPERTY )  
UNIT, 575 SOUTH 10<sup>TH</sup> )  
STREET, LINCOLN, )  
LANCASTER COUNTY, NE )  
Q2407771 )

CR24-1

SEARCH WARRANT  
RETURN

CLERK OF THE  
DISTRICT COURT

2024 MAY 24 PM 2:57

LANCASTER COUNTY

STATE OF NEBRASKA )  
COUNTY OF LANCASTER )

ss.

The undersigned states that he/she received the search warrant issued herein on the 7th day of May, 2024 and that he/she executed the same on the 13th day of May, 2024 seized the property/person described in the inventory filed herein and by delivering a copy of the said order for said property/person at the place from which the property/person was taken.

DATE this 17<sup>th</sup> day of May, 2024.

Joanna Dimas  
Deputy Joanna Dimas

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of May, 2024.

Diane L. Kegley  
Notary Public

C4002865



229

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

IN THE MATTER OF THE )  
SEARCH WARRANT FOR )  
PROPERTY LOCATED IN THE )  
LINCOLN POLICE DEPARTMENT )  
PROPERTY UNIT, 575 SOUTH )  
10<sup>TH</sup> STREET, LINCOLN, )  
LANCASTER COUNTY, NE )  
Q2407771 )

INVENTORY

CLERK OF THE  
DISTRICT COURT

2024 MAY 24 PM 2:58

LANCASTER COUNTY

STATE OF NEBRASKA )  
 ) ss.  
County of Lancaster )

Deputy Joanna Dimas being first duly sworn upon oath, deposes and states the following is an inventory of property seized by virtue of the warrant issued herein:

- o Cellular file extraction

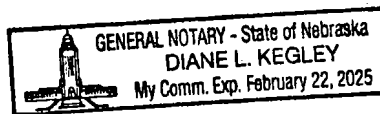
DATED this 17<sup>th</sup> day of May, 2024.

Joanna Dimas  
Deputy Joanna Dimas

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of May, 2024.

Diane L. Kegley  
Notary Public

C4002865



RECEIPT

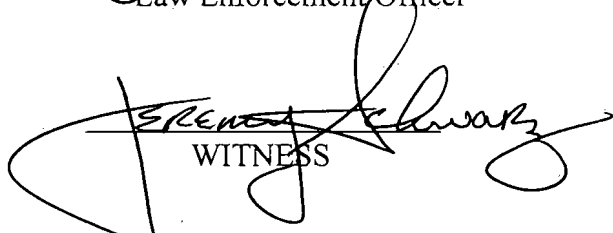
The undersigned hereby acknowledges receipt of the following described property seized from a blue Google smartphone, located in the custody of the Lincoln Police Department Property Unit, labeled with Property Number Q2407771 and case number C4002865, Lancaster County, Nebraska:

Cellular file extraction

LANCASTER COUNTY  
2024 MAY 24 PM 2:58  
CLERK OF THE  
DISTRICT COURT

DATED this 13<sup>th</sup> day of May, 2024.

  
Law Enforcement Officer

  
WITNESS

C40002865

CLERK OF THE  
DISTRICT COURT

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA            )  
  )            ss.     SEARCH WARRANT  
COUNTY OF LANCASTER        )

TO: Joanna Dimas, a Deputy Sheriff with the Lancaster County Sheriff's Office, Lancaster County, Nebraska, and any and all law enforcement officers.

WHEREAS, Joanna Dimas, has filed an Affidavit before the undersigned Judge of the County Court of Lancaster County, Nebraska, a copy of which affidavit is attached hereto and made a part hereof; the court finds that the facts set forth in said Affidavit are true, and that those facts do constitute grounds and probable cause for the issuance of a Search Warrant.

THEREFORE, you are commanded to search the following devices in the custody of the Lincoln Police Department Property Unit, 575 South 10<sup>th</sup>, Lincoln, Lancaster County, Nebraska:

- 1. Blue Google Smartphone, labeled with Property Number Q2407771 and Case Number C4002865

**Evidence to be searched for includes:**

- a. Evidence of other accounts associated with this device including email addresses, social media accounts, messaging "app" accounts, and other accounts that may be accessed through the digital device that will aid in determining the possessor/user of the device;
- b. Evidence of use of the device to communicate with others about the aforementioned crime(s), via email, chat sessions, instant messages, text messages, app communications, social media, internet usage, and other similar digital communications;

- c. Photographs, images, videos, documents, and related data created, accessed, read, modified, received, stored, sent, moved, deleted or otherwise manipulated;
- d. Evidence of use of the device to conduct internet searches relating to narcotics, narcotics sales and purchases, and child abuse;
- e. Information that can be used to calculate the position of the device, including location data; GPS satellite data; GPS coordinates for routes and destination queries; application data or usage information and related location information; IP logs or similar internet connection information; and images created, accessed or modified, together with their metadata and EXIF tags;
- f. Evidence of the identity of the person in possession of the device(s) and the associated times and dates. Such evidence may be found in digital communications, photos and video and associated metadata, IP logs, documents, social media activity, and similar data;
- g. Records linking the suspect, co-conspirators, victims, and/or witnesses to a certain screen name, handle, email address, social media identity, etc.;
- h. Records showing a relationship with suspects, co-conspirators, victims, witnesses, and/or locations, etc.;
- i. Names, nicknames, account ID's, phone numbers, or addresses of specific persons;
- j. Records showing a relationships to particular areas or locations associated with narcotics, narcotics sales and purchases and child abuse;
- k. Photographs, images, videos, documents that contain or are evidence of narcotics, narcotics sales and purchases and child abuse;
- l. Evidence of purchases, such as items used in planning or facilitating the sale or purchase of narcotics, use of narcotics and child abuse;
- m. Internet research history conducted while planning, executing, or covering up the sale or purchase of narcotics, use of narcotics or child abuse;

n. Any live and deleted user attribution data including user accounts, e-mail accounts, passwords, PIN codes, patterns, account names, user names, screen names, remote data storage accounts, documents, files, calendars, metadata, recycle bin files, and any other information and evidence that may demonstrate attribution to a particular user or users;

o. Any live and deleted applications, programs, or software, used to facilitate the creation, storage, display, or transmission of digital visual recordings and the logs and data associated with the applications, programs or software, and any device backup files;

p. Any live and deleted audio or visual recording files including files bearing file extensions jpg, jpeg, png, gif, tif, wav, aiff, mp3, mp4, avi, mpg, mpeg, flv, mp4, mov, and wmv along with any descriptive metadata within or associated with the visual recording files, which may include date and time the recording was created, the device used to create the recording and location the recording was made;

q. Any live and deleted passwords, password files, keys, encryption codes, or other information necessary to access the digital device, software or data stored on the digital device;

r. Any live and deleted records, documents, programs, applications, information, or materials created, modified, or stored in any form on the digital devices listed in this affidavit, that show the actual users of the computers or digital devices including web browser history; temporary Internet files; cookies, bookmarked or favorite web pages; e-mail addresses used from the computer; MAC IDs and/or Internet Protocol addresses used by the computer; e-mails, instant messages, text messages (SMS/MMS), application data and other electronic communications; address books; contact lists; records of social networking and online service usage; calendar entries, notes, journals, and any software that would allow others to control the digital device such as viruses, Trojan horses, malware, and other forms of malicious software.

This Court, being duly advised that the examination of digital devices is a lengthy process requiring special steps to ensure the integrity of the electronic evidence, finds it may not be possible to complete a return for the Court within the 10 days normally required by the Court.

Given under my hand and seal this 7 day of May, 2024.



  
\_\_\_\_\_  
JUDGE OF THE COUNTY COURT

  
\_\_\_\_\_  
Printed Name of County Court Judg

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA )
) ss. SEARCH WARRANT AFFIDAVIT
COUNTY OF LANCASTER )

Joanna Dimas, being first duly sworn upon oath deposes and states that she is an Investigator for the Lancaster County Sheriff's Office, Lancaster County, Nebraska. Your AFFIANT further states she is currently involved in the investigation of possession of a controlled substance, Nebraska Revised Statute 28-416 and child abuse, Nebraska Revised Statute 28-707 occurring at 14541 Bailie Street, Waverly, Lancaster County, Nebraska. As part of the investigation, your AFFIANT has consulted with other law enforcement and reviewed case reports. Your AFFIANT states as follows:

The item to be searched for digital evidence is particularly described as:

- 1. Blue Google Smartphone, labeled with Property Number Q2407771 and Case Number C4002865

The item to be searched is in the custody of the Lincoln Police Department Property Unit, 575 South 10th, Lincoln, Lancaster County, Nebraska. The item to be searched shall be delivered to the Electronic Evidence Unit, located at 605 South 10th, Lincoln, Lancaster County, Nebraska for digital forensic processing and analysis. The Electronic Evidence Unit forensic examiners may designate additional forensic services, as deemed necessary, to complete the analysis. Once examination and analysis has been completed, the listed evidence shall be returned to the Lincoln Police Department Property Unit, where it will be held until any final disposition by the Court.

RELEVANT FACTS

On November 24th, 2023, Deputies with the Lancaster County Sheriff's Office responded to a domestic violence incident at 14541 Bailie Street, Waverly, Lancaster County, NE involving a weapon that was fired. Abby Erdmann stated her boyfriend, Joaquin Garcia attempted to assault her and bit her on her left leg.



When Garcia's brother, Javier Garcia, attempted to intervene, Garcia retrieved a firearm and fired a shot in the direction of Javier's head. Erdmann and Garcia's minor children, A.G., a 13-year-old female and Z.G., a 3-year-old female, were present during this incident. A search warrant was authored and executed at the residence. Deputies located approximately 1.50 grams of suspected cocaine and multiple firearms. Garcia was arrested and lodged at the Lancaster County Adult Detention Facility where he remains in custody.

On January 2nd, 2024, Deputies with the Lancaster County Sheriff's Office went to 14541 Bailie Street, Waverly, Lancaster County NE, to locate Erdmann on an active arrest warrant. Erdmann was at her residence with 3 other adults that were observed actively using narcotics through a lower bedroom window. Deputies seized approximately 1.60 grams of suspected methamphetamine, a 1ML syringe and a clear, bulbous pipe with suspected narcotics residue. These items were tested at the Nebraska State Laboratory and On March 17th, 2024, were all confirmed to be methamphetamine. One of the males, Russell Runyan, also had an active arrest warrant out of Douglas County.

The Department of Health and Human Services Division of Child and Family Services opened a case to attempt to support Erdmann and her two children. CFS Molly Kincaid has been assigned to this family. Erdmann's older sister, Lacie Nordstrom, agreed to take temporary custody of A.G. and Erdmann's mother, Stacy Erdmann, agreed to take temporary custody of Z.G. Lacie has attempted to get medical and dental care as well as therapy for A.G. but Erdmann has not signed the paperwork for Stacey to obtain these things on behalf of A.G. Erdmann was going to Stacy's residence to stay with Z.G. to stay with her while Stacy worked. Kincaid was helping Erdmann get Z.G. into early childhood education programs but Erdmann again would not follow through on meetings or paperwork to make this happen. Stacy also reported that Erdmann would come and go at all hours, including the middle of the night, and would take Z.G. with her. Erdmann would justify this by saying that she was working with Health and Human Services voluntarily and could do with them what she chose. On February 14th, 2024, Erdmann took Z.G. from Stacy's home and has never brought her back since.

On April 15th, 2024, Kincaid went to Erdmann's home to attempt a safety plan check. Kincaid told your Affiant that Erdmann drove onto Bailie Street and saw her state marked vehicle parked near the residence. Erdmann then appeared to pick up speed and pull into the garage. Erdmann closed the garage and did not answer the door or phone calls from Kincaid. Deputy Sturdy, an employee of the Lancaster County Sheriff's Office, currently assigned to the Patrol Unit, responded to Erdmann's home. Deputies knocked on the door and attempted to call Erdmann at this time. Deputies waited on location for approximately 30 minutes to try to contact Erdmann and check the welfare of Z.G. Erdmann never answered the door or returned any phone calls.

On April 16th, 2024, Kincaid reported to your Affiant that Erdmann is no longer cooperating with the open case. Erdmann has missed appointments, doesn't answer her phone or return phone calls and is not answering her door. Kincaid has also received a report of Z.G. living in filth and not being cared for by Erdmann. Your Affiant then spoke with Stacy Erdmann. Stacy reports that on April 10th, 2024, she had attempted to reach Erdmann by phone for several days. After not receiving a response and Erdmann missing another appointment, Stacy went to 14541 Bailie Street, Waverly, Lancaster County, NE. Stacy knocked on the door for several minutes and did not get an answer. Stacy knew the garage code and opened the door. Stacy located Erdmann's pick up inside of the garage and entered the residence. Stacy told your Affiant that the residence was a complete mess. Stacy observed items completely covering and blocking the stairway of the split-level entrance. Inside of the kitchen the countertops were covered with open and sticky foods, including items that should have been refrigerated. At one-point Z.G. picked up a half gallon of milk from the countertop and drank out of it. Stacy also told Kincaid that she saw dog urine and feces in the home. Stacy eventually left the residence and took 2 totes of clothing home with her to wash so that Z.G. could access and sleep in her bed. Stacy said she is unsure if Erdmann is using methamphetamine again, however Stacy is aware that Erdmann is allowing her friend and previous narcotics dealer to spend time at the those. Russell Runyan has also been in and out of Erdmann's home and has 2 active arrest warrants for theft by shoplifting, criminal trespass and possession of a controlled substance. Stacy also informed Erdmann that the landlord intends to evict her and Z.G. will have nowhere to live. Erdmann refuses to believe this is happening and told Stacy she has no intention of moving out.

Erdmann intends to have her friend move in and help pay rent. Z.G. has not been seen by Health and Human Services, law enforcement or family since Stacy was at the home.

On April 16th, 2024, your Affiant spoke with Lacie Nordstrom who is caring for Erdmann's daughter A.G and is also Erdmann's sister. Nordstrom has been unable to place A.G. into therapy at this time as Erdmann is not attempting to get A.G. back nor will she sign temporary paperwork to allow Nordstrom to do so. Nordstrom is afraid that when school is out in May A.G. will go back to Erdmann and will again be physically and emotionally neglected. Nordstrom believes that Erdmann is actively using methamphetamine due to the people that Erdmann is allowing to go in and out of her home.

Your Affiant spoke with the landlord and partial owner of 14541 Bailie Street, Waverly, Lancaster County, NE, Gregory Heller on April 16th, 2024. Heller stated that Erdmann has stopped paying rent or communicating with him in any way. Heller said that his attorney has drafted paperwork for a legal eviction and the process has already started. All of these things are documented under the child abuse case number C4002828.

On April 16<sup>th</sup>, 2024, your Affiant authored a search warrant for 14541 Bailie Street, Waverly, Lancaster County, NE and it was signed by Judge Zimmerman. Investigators with the Lancaster County Sheriff's Office were authorized to search for Z.G. and check her welfare as well as, narcotics, narcotics paraphernalia, and observe and document the conditions of the residence. The search warrant executed the warrant on or about 2:32 PM CST. Seth Saltzman was located in the basement of the residence along with Z.G. On a coffee table in the basement was a crystalline substance that pretested positive for methamphetamine and a straw, commonly used for 'snorting' narcotics. This box was easily accessible to Z.G. Abby Erdmann was upstairs and in the master bedroom a purse was found containing Erdmann's Nebraska driver's license and two glass pipes with burnt residue that pretested positive for the presence of methamphetamine. Erdmann was cited and lodged for possession of a controlled substance, a violation of N.R.S. 28-416 and cited for child abuse, a violation of N.R.S. 28-707 under case number C4002865. An affidavit for temporary custody

was completed and Z.G. was taken into the custody of the Department of Child and Family services.

On April 17<sup>th</sup>, 2024, your affiant was contacted by Lacie Nordstrom, who has currently custody of by A.G. and Z.G. Nordstrom said that Erdmann left her phone with Z.G. While Z.G. was unlocking the phone to continue playing with it Nordstrom became aware of messages in the phone. Nordstrom read messages sent by Erdmann on April 15<sup>th</sup> to 'Beaver', whom Nordstrom knows to be Zachery Dillon, discussing her knowledge of her caseworker waiting outside for two hours and that law enforcement was also at her residence and Erdmann was not going to answer the door or phone. Nordstrom also viewed multiple images of pornography and videos made and sent by Erdmann engaged in sexual acts with other adults. Nordstrom was concerned as Z.G. knows how to unlock the phone and uses the phone on a regular basis and would be available to view these messages at any time without Erdmann's knowledge. Nordstrom noted another message from 'Chance' stating that Erdmann owed him money and that he is going to come after her for it. Nordstrom believes this is in reference to Erdmann's ongoing purchase and use of methamphetamine, as Erdmann does not have a job and has not worked for a period of years. After Nordstrom turned the phone over to your affiant, Erdmann became upset and told Nordstrom that she should have lied to law enforcement about the phone.

Your affiant arranged for A.G. to participate in a forensic interview at BraveBe Child Advocacy Center, 5025 Garland Street, Lincoln, Lancaster County, NE on April 19<sup>th</sup>, 2024. During the interview A.G. stated she was aware that her mom, Erdmann, was arrested for narcotics and believed that it was methamphetamine. A.G. said she had opened a container in the garage once and found marijuana in it. A.G. and Z.G.'s hair follicles were tested to determine their contact with narcotics. A.G.'s test was negative however she has been living with Nordstrom since January 2024. Z.G. had been living with Erdmann and tested positive for methamphetamine and amphetamine.

#### **INVESTIGATOR BACKGROUND**

Your AFFIANT is a certified law enforcement officer in the State of Nebraska with 2 of experience investigating crimes including, but not limited to child abuse

and neglect, child sexual assault and child sexual abuse material, narcotics investigation, domestic violence and adult sexual assault. Your AFFIANT is an Investigator assigned to the Lancaster County Sheriff's Office's Criminal Division and has received training and experience in technologically based investigative tools, including cellular devices. Through such training and experience, your affiant understands the capabilities of cellular devices and the valuable information contained within pertaining to criminal investigations. Furthermore, most people possess cellular telephones and other connected devices (tablets, watches, laptops, etc.) used to communicate electronically. It can be generally recognized that cellular devices tend to accompany their users everywhere, and thus, it may be inferred that a suspect's cellular phone accompanied the suspect at the time of the crime.

Your AFFIANT knows based on her training and experiences that people who are involved in possession of a controlled substance use cellular devices and computers to facilitate the planning, execution of the activity, and transactions of drug sales or transactions. Cellular devices and computers with messaging capabilities are also the primary means for those who are involved in illegal activity to communicate with each other to arrange narcotic deals, money transfers, weapon transfers, thefts, and other forms of illegal activity.

Your AFFIANT also knows that cellular devices and computers can also be used in the sales and purchase of illegal narcotics. These devices can contain data in memory such as email, communications applications, text messages, calendar events, contacts, photographs, video of illegal narcotics transactions and call records of both the source of narcotics, and any customers.

Your AFFIANT knows from her training and experiences that dedicated GPS devices store large amounts of data. Location data including waypoints, search history, home location and routes of travel all are stored on the device. GPS devices record location points while powered on, and this data is also stored on the device. GPS devices can also be used as removable media, with the capability of storing any digital data. GPS devices record location points while powered on, and this data is also stored on the device.

Your AFFIANT knows from her training and experiences that SIM cards, or Subscriber Identification Module, are used in GSM cellular networks. SIM cards can contain subscriber identification numbers, text messages, and contacts, among other identifying information.

Your AFFIANT knows from her training and experiences that images and data captured on cellular devices or tablets are easily transferred. Data or data files can be transferred from device to device via storage cards, and wireless technologies. Data can also be transferred to computers via data cables or wireless technology.

Your AFFIANT knows that cellular devices and tablets can contain data in memory such as email, text messages, calendar events, contacts, photographs, videos, and call records.

Your AFFIANT also knows from her training and experiences that cellular devices, especially 'smart phones', and tablets can access the internet in the same capacity as a desktop computer. Smart phones and tablets have internet web browsers, email clients, and software to enable the same functionality as a traditional desktop or laptop computer.

Your AFFIANT knows from her training and experience those cellular devices, especially 'smart phones' and tablet devices using the Android and Apple iOS operating systems, create and store GPS (Global Positioning System) data. This data can be stored for the lifetime of the phone or tablet.

Your AFFIANT also has knowledge in the forensic analysis of computers, cellular devices, and other digital media. Your AFFIANT advises that the examination of computer files, documenting the examination, and making evidentiary and discovery copies of evidence found on a computer and storage devices is a lengthy, technical process. It is necessary to determine that no security devices are in place, which causes the destruction of evidence during the search. In some cases, it is impossible to even conduct a search without expert technical assistance.

Electronic device data search protocols are exacting procedures designed to protect the integrity of the evidence and to recover even “hidden”, erased, compressed, password-protected, or encrypted files. Using these procedures, it is also possible to recover evidence from “slack space” and/or “unallocated space” of the storage media. The data in these areas is not controlled by the user of a computer and can exist on a computer for extended periods of time. In theory, it can exist for several years. It is possible that evidence is contained within the data stored in the slack space and/or unallocated space.

Your AFFIANT also advises the Court that technical expertise is necessary to complete examination of electronic evidence. Because of the possibility that files may be hidden, or codes put in place to prevent the retrieval of data, it may become necessary to request assistance of an individual/s who are not commissioned law enforcement officers but who are trained and/or learned in the retrieval of data stored in a computer or related devices.

Your AFFIANT also advises that an examination requires all peripheral devices, software and documentation, printed and handwritten, be seized since it would be impossible without examination to determine that it is standard, commercially available software and/or hardware. In some instances, it is necessary to have the software used to create data files and records in order to read the files and records. In addition, without examination, it is impossible to determine that the disks purporting to contain standard commercially available software program has not been used to store records instead.

Your AFFIANT knows digital data can be found in numerous locations and formats. Evidence can be embedded into unlikely files for the type of evidence, such as a photo included in a document or converted into a PDF file or other format to conceal their existence. Information on devices and media can be stored in random order; with deceptive file names; hidden from normal view; encrypted or password protected; and stored within applications on cellular devices.

Your AFFIANT knows, as with other types of evidence, the context, location, and data surrounding information in the device data is often necessary to understand whether evidence falls within the scope of the warrant. This type of information

will be important to the forensic examiner's ability to piece together and recognize evidence of criminal activity.

Your AFFIANT advises that it has been recognized by the Nebraska Supreme Court that law enforcement cannot predict where evidence of a crime will be located in a cellular device, or call records, or in what format, such as texts, videos, photographs, emails, or applications. And it has been further stated that there is no way for law enforcement to know where in the digital information associated with cell phones it will find evidence of the specified crime. Consequently, a brief examination of all electronic data associated with a cell phone is usually necessary to find where the information to be seized is located, and such examination is reasonable under the Fourth Amendment.

No wire communications or electronic communications will be intercepted. There is no reason to believe that any of the computers operate in any way as a server of an electronic bulletin board service. As such, the provisions of the Wire and Electronic Communications Interception Act would not apply. Should information of this type be discovered, it would be set aside, unopened.

There is no indication that there is any "work product" or "documentary" material stored on the computers with the purpose of disseminating to the public a newspaper, broadcast, or other similar form of public communication. Should officers become aware of any such materials, they shall be returned as quickly as circumstances permit.

Furthermore, your AFFIANT advises that the examination of an electronic device is a lengthy process requiring special steps to ensure the integrity of the electronic evidence. Therefore, your AFFIANT would like to advise the Court that it may not be possible to complete a return to the Court within the 10 days normally required by the Courts.

Your AFFIANT believes that the information presented to her is factual and that there is reason to believe that the below-mentioned property has location and communication data, along with other evidence related to this case.



The above does constitute grounds of probable cause for the issuance of a Search Warrant for the following device:

1. Blue Google Smartphone, labeled with Property Number Q2407771 and Case Number C4002865.

**Evidence to be searched for includes:**

- a. Evidence of other accounts associated with this device including email addresses, social media accounts, messaging “app” accounts, and other accounts that may be accessed through the digital device that will aid in determining the possessor/user of the device;
- b. Evidence of use of the device to communicate with others about the aforementioned crime(s), via email, chat sessions, instant messages, text messages, app communications, social media, internet usage, and other similar digital communications;
- c. Photographs, images, videos, documents, and related data created, accessed, read, modified, received, stored, sent, moved, deleted or otherwise manipulated;
- d. Evidence of use of the device to conduct internet searches relating to narcotics, narcotics sales and purchases, and child abuse;
- e. Information that can be used to calculate the position of the device, including location data; GPS satellite data; GPS coordinates for routes and destination queries; application data or usage information and related location information; IP logs or similar internet connection information; and images created, accessed or modified, together with their metadata and EXIF tags;
- f. Evidence of the identity of the person in possession of the device(s) and the associated times and dates. Such evidence may be found in digital communications, photos and video and associated metadata, IP logs, documents, social media activity, and similar data;
- g. Records linking the suspect, co-conspirators, victims, and/or witnesses to a certain screen name, handle, email address, social media identity, etc.;
- h. Records showing a relationship with suspects, co-conspirators, victims, witnesses, and/or locations, etc.;
- i. Names, nicknames, account ID’s, phone numbers, or addresses of specific persons;

j. Records showing a relationships to particular areas or locations associated with narcotics, narcotics sales and purchases and child abuse;

k. Photographs, images, videos, documents that contain or are evidence of narcotics, narcotics sales and purchases and child abuse;

l. Evidence of purchases, such as items used in planning or facilitating the sale or purchase of narcotics, use of narcotics and child abuse;

m. Internet research history conducted while planning, executing, or covering up the sale or purchase of narcotics, use of narcotics or child abuse;

n. Any live and deleted user attribution data including user accounts, e-mail accounts, passwords, PIN codes, patterns, account names, user names, screen names, remote data storage accounts, documents, files, calendars, metadata, recycle bin files, and any other information and evidence that may demonstrate attribution to a particular user or users;

o. Any live and deleted applications, programs, or software, used to facilitate the creation, storage, display, or transmission of digital visual recordings and the logs and data associated with the applications, programs or software, and any device backup files;

p. Any live and deleted audio or visual recording files including files bearing file extensions jpg, jpeg, png, gif, tif, wav, aiff, mp3, mp4, avi, mpg, mpeg, flv, mp4, mov, and wmv along with any descriptive metadata within or associated with the visual recording files, which may include date and time the recording was created, the device used to create the recording and location the recording was made;

q. Any live and deleted passwords, password files, keys, encryption codes, or other information necessary to access the digital device, software or data stored on the digital device;

r. Any live and deleted records, documents, programs, applications, information, or materials created, modified, or stored in any form on the digital devices listed in this affidavit, that show the actual users of the computers or digital devices including web browser history; temporary Internet files; cookies, bookmarked or favorite web pages; e-mail addresses used from the computer; MAC IDs and/or Internet Protocol addresses used by the computer; e-mails, instant messages, text messages (SMS/MMS), application data and other electronic communications; address books; contact lists; records of social networking and online service usage; calendar entries, notes, journals, and any

software that would allow others to control the digital device such as viruses, Trojan horses, malware, and other forms of malicious software.

Your AFFIANT would also like to advise the court that the examination of digital devices is a lengthy process requiring special steps to ensure the integrity of the electronic evidence. Therefore, it may not be possible to complete a return for the court within the 10 days normally required by the court.

Further AFFIANT saith not;

Dated this 7 day of May, 2024.



Joanna Dimas  
Joanna Dimas, AFFIANT

SUBSCRIBED to in my presence and sworn to before me this 7 day of May, 2024.

[Signature]  
JUDGE OF THE COUNTY COURT

Josiah Davis  
Printed Name of County Court Judge