

LPD Case Number: C4-030568

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

CR 24-1

IN THE MATTER OF THE SEARCH WARRANT
OF THE DESCRIBED PREMISES OF
SNAPCHAT, INC. CUSTODIAN OF RECORDS
2772 DONALD DOUGLAS LOOP NORTH
SANTA MONICA, CALIFORNIA 90405

SEARCH WARRANT RETURN

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

The undersigned states that he received the Search Warrant issued herein on the 9th day of May, 2024, and that he executed the same on the 17th day of May, 2024, by seizing the property described in the Inventory filed herein and by delivering a copy of the Search Warrant for the said property at the place from which the property is taken.

[Signature]

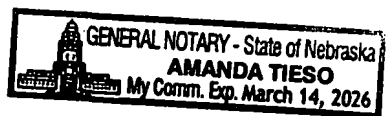
Inv. Joseph Villamonte #1700

SUBSCRIBED to in my presence and sworn to before me this 22 day of May, 2024.

[Signature]

Notary Public

LANCASTER COUNTY
2024 MAY 23 PM 2:48
CLERK OF THE
DISTRICT COURT



Warrant Return & Inventory



002181777D02

2240

[Signature]

RECEIPT

The undersigned hereby acknowledges receipt of the following described property seized from Snapchat, Inc. Custodian of Records, 2772 Donald Douglas Loop North, Santa Monica, California 90405 :

Production-251348861-2024051716-3c22a1d4_delivery.zip

LANCASTER COUNTY
2024 MAY 23 PM 2:59
CLERK OF THE
DISTRICT COURT

DATED this 17th day of May, 2024.



Law Enforcement Officer



WITNESS

IN THE COUNTY OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA

)

) ss. SEARCH WARRANT

COUNTY OF LANCASTER

)

CLERK OF THE DISTRICT COURT

2024 MAY 23 PM 2:59

LANCASTER COUNTY

TO: Joe Villamonte, an Investigator with the Lincoln Police Department, Lancaster County, Nebraska, and any and all law enforcement officers.

WHEREAS, Joe Villamonte has filed an Affidavit before the undersigned Judge of the County Court of Lancaster County, Nebraska, and said written Affidavit, having been duly considered, 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.

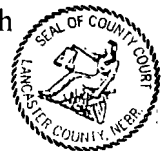
Pursuant to Neb. Rev. Stat. 86-2,108, the Court finds that the records which are the subject of this search warrant are material and relevant to a legitimate law enforcement ongoing investigation. Snap Inc. is ordered NOT to notify any other person of the existence of this search warrant, including the user of the account, or release any information related to this search warrant, as there is reason to believe that notification or other disclosure would impede this ongoing investigation or otherwise cause an adverse result, as defined by law. This notice or disclosure restriction shall be for a period not to exceed 90 days.

THEREFORE, you are commanded to search the places(s) listed in Attachment A to seize the listed property, as well as search the property for the digital evidence listed in Attachment B.

Service Provider shall send the information electronically via email at **LPD1700@LINCOLN.NE.GOV** or to **JOE VILLAMONTE #1700** at the Lincoln Police Department, 575 S 10th Street, Lincoln, NE, 68508.

This search warrant shall be executed and returned within ten (10) days to a Clerk of the Lancaster District Court, Nebraska. In the event records are not received from the Service Provider within ten (10) days, your Affiant requests authorization to returned the search warrant within ten (10) days of receipt of the records.

Given under my hand and seal this 1 day of May, 2024.



Judge of the County Court

Printed Name of Judge

ATTACHMENT A

Property to Be Searched

This warrant is directed to Snap Inc. – 2772 Donald Douglas Loop North, Santa Monica, CA 90405.

Service via (Snap Inc.) Law Enforcement Request System (LERS) on-line via:
<https://less.snapchat.com/login>

This warrant applies to records associated with specific Snapchat accounts associated with: Username: **daelin_400k**

with preserved data associated to Snap Inc. case number/preservation ID **6810d8b797**.

ATTACHMENT B

Particular Things to be Seized

To the extent that the information described in Attachment A is within the possession, custody, or control of Snap Inc. regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available, or have been preserved.

Snap Inc. is requested to disclose the following records for each identifier listed in Attachment A for the time frame of **March 12th, 2024 at 0001 hours to April 12th, 2024 at 2359 hours**, specifically for the following items:

1. Contact information showing names, telephone numbers, addresses, or any other personal information relating to contacts stored within the Snapchat Account/ Snapchat Messenger, as well as similar data that has been deleted from the Snapchat Account but may still be extracted from the Snapchat servers;
2. Records reflecting outgoing, incoming, and missed calls/messages showing Snapchat video/voice/text communications, as well as similar data that has been deleted from the Snapchat Account but may still be extracted from the Snapchat servers;
3. Incoming, outgoing, and “draft” messages, picture messages, video messages, and incoming and outgoing e-mails detailing Snapchat Account data communications, as well as similar data that has been deleted from the Snapchat Account but may still be extracted from the Snapchat server;
4. Still photographs, video clips, and audio clips from Snapchat or Snapchat Messenger, as well as similar data that has been deleted from Snapchat or Snapchat Messenger but may still be extracted from the Snapchat server;
5. All information held by Snap, Inc. to include, but is not limited to, Basic Subscriber Information collected when a user creates a new Snapchat account, alters information at a later date, or otherwise interacts with the Service, Basic subscriber information that may include Snapchat username, Email address, Phone number, Snapchat user vanity name, Snapchat account creation date and IP address, Timestamp and IP address of account logins and logouts and any Logs of Previous Snaps, Stories, and Chats Snapchat for Snaps, Story content, and Memories content, the IP address when the account was established, associated user name(s), associated e-mail address(es), verification telephone number(s), device identification numbers such as Unique Device Identification (UDID), International Mobile Equipment Identifier (IMEI), Mobile Equipment Identifier (MEID), Google Play Store and/or Apple App Store account information and all other account information that may be associated with this account after it has been identified.

6. Evidence of who used, owned, or controlled the Snapchat Account at the time the things described in this warrant were created, edited, or deleted, to include account numbers, account login names/identities, and passwords associated with the Snapchat Account
7. Waypoints saved GPS locations, or any electronic information stored on the Snapchat Account that may relate to recent trips or points of interest.
8. All precision location information associated with users account to include GPS, wireless networks, cell towers, Bluetooth, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses.
9. Any other items that are contraband and are fruits of, have been used in the commission of, or may constitute evidence of this crime;
10. Records of any Snapchat accounts that are linked to the Account by machine cookies (meaning all Snapchat user IDs that logged into Snapchat by the same machine as the Account);
11. "My AI" chat box communications content, including recorded interactions with the AI, actions taken by the AI on behalf of the Target accounts, and stored conversations with the "My AI" service and User location information shared with "My AI" chatbot.

IN THE COUNTY COURT OF LANCASTER COUNTY, NEBRASKA

2024 MAY 23 PM 3:00

LANCASTER COUNTY

CLERK OF THE DISTRICT COURT

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

Joe Villamonte, being first duly sworn upon oath deposes and states that he is an Investigator for the Lincoln Police Department, Lincoln, Lancaster County, Nebraska. AFFIANT states he is currently involved in the investigation of a **DEL/POSS W/INTENT TO DELIVER (HAZ DRUG) - 28-416(1)(A)** occurring on 04-12-2024, at 620 South 17th Street #1B, Lincoln, Lancaster County Nebraska. AFFIANT has reviewed case reports regarding this investigation prepared by other involved Law Enforcement Officers.

Affiant's Background

Your affiant has been a police officer for the Lincoln Police Department since 2012. Since 2012 Affiant has been investigating misdemeanor and felony crimes with the Lincoln Police Department to include homicide, burglary, robbery, assault, weapon offences, narcotics, sexual assault, human trafficking, child enticement, and pornography. Your Affiant has training and experience in conducting criminal investigations.

This Affidavit is submitted in support of a search warrant. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, your Affiant not set forth every fact known to me regarding this investigation. The statements contained in this Affidavit are based in part on the investigation that your Affiant has conducted, and information provided to your Affiant by other law enforcement officers verbally, and through written reports.

Case Facts

On 07-08-2021, Lincoln Police Officers responded to a shooting at 2721 South 66th Place in which officers located two shooting victims, Daelin Collins (DOB 03-13-1997), and Katherin Stitt (DOB 06-07-2000). During the investigation, Collins two Apple iPhones were seized, and search warrants were obtained for both phones by Lincoln Police Investigator Cronin #1347. During a search of the phones by your Affiant, numerous chat messages were observed where Collins is involved in the sale of numerous controlled substances including marijuana, controlled pills, and cocaine. Your

Affiant also observed numerous pictures of firearms on the devices as well as pictures of controlled substances.

Over the course of the next two years multiple police contacts with Collins occurred. During three of those contacts, Collins was found in possession of marijuana, showing a continued pattern of marijuana possession.

On 05-29-2021, Lincoln Police Officer Walters #1885 conducted a traffic stop in the 900 Block of Q Street and contacted Collins as the driver of the vehicle during the stop. Officer Walters noted an odor of marijuana coming from within the vehicle, and Collins admitted there was marijuana in the vehicle. Officer Walters located 65.2 grams of marijuana during a search of the vehicle, and Collins was cited and released.

On 09-03-2023, Lincoln Police Officer Neelly contacted Collins on a traffic stop in the 1800 Block of O Street. During the stop, Officer Neelly noted an odor of marijuana coming from within the vehicle. Officer Neelly located approximately 7 grams of marijuana and Collins was cited and released.

On 11-01-2023, Lincoln Police Officer Neelly contacted Collins on a traffic stop in the 1800 Block of A Street. During the stop, Officer Neelly noted the odor of marijuana coming from within the vehicle. During a search of the vehicle and occupants, Officer Neelly located 8.3 grams of marijuana inside of Collin's coat pocket and a digital scale in the vehicle. Collins was cited and released.

On 01-11-2024, the Lincoln Police Department received an anonymous Crimestoppers complaint involving Collins selling narcotics. The complaint states Collins lives at 620 South 17th Street #1B and drives a black Nissan vehicle with A&R paper auto tags. The complaint states Collins sells cocaine and marijuana with people coming to the apartment all night long.

In February 2024, the Nebraska Department of Health and Human Services received an intake involving Collins, his minor child, and the living conditions at 620 South 17th Street #1B. The complaint is from an unknown female who states they observed Collins minor child inside of the residence with access to firearms and cocaine that were on a kitchen table in the residence. The reporting person also stated Collins sells narcotics and described dirty living conditions for the child. On 02-29-2024, Lincoln Police Officers were radioed to the residence to assist DHHS with removal of the minor child from the apartment.

Beginning in March 2024, your Affiant began to conduct social media surveillance on Collins' known Snapchat account under username 'daelin_400k'. Your Affiant has observed Collins in selfie style photographs and videos while monitoring the account, verifying the account belongs to Collins. On 03-13-2024, your Affiant observed Collins post a photograph of himself in a vehicle with the caption of 'We outside with t early'. Your Affiant knows through extensive investigative experience involving social media narcotic sales that people posting this terminology to social media are referring them to be mobile selling their controlled substances. On 03-13-2024, your Affiant

photograph to his social media account with the caption of 'outside with it !! hit da lines' and two cell phone emojis. Your Affiant knows the investigative experience that Collins is advertising he is mobile with controlled substances and to contact him via phone to purchase the controlled substances.

On 04-02-2024, your Affiant observed Collins post a photograph to social media in a vehicle the caption of two cell phone emojis an arrow pointing to the cell phones. Your Affiant knows through investigative experience that Collin's is wanting people viewing the post to contact him via phone to purchase controlled substances. On 04-03-2024, your Affiant observed Collins post a photograph to social media of a large bud of marijuana. Your Affiant knows through investigative experience that people commonly post photographs of the controlled substances they have for sale or that they are using. These social media posts are consistent with the behavior from 2021 to 2023 which resulted in traffic stops during which Collins was in possession of marijuana.

Your Affiant has conducted a utility check from Lincoln Electrical Services and found Collins to have an LES account at 620 South 17th Street #1B with a move in date of 01-21-2023. Your Affiant and other Lincoln Police Investigators have conducted surveillance at the residence and have observed Collins exiting the building and for his black 2014 Nissan Altima with no license plates to be parked outside of the building.

On 04-11-2024, Investigators were conducting surveillance on 620 South 17th Street and Collins vehicle. Investigators observed Collins exit the north door of the building and enter the driver's side of his vehicle. Investigators then observed a male walk to the vehicle on foot and enter the front passenger side of the vehicle. The male exited the vehicle approximately 5 minutes later and left in another vehicle that was parked in a nearby parking lot. Collins then left the complex in his vehicle. Your Affiant knows through training and extensive narcotic investigative experience that short term contact in vehicles as well as residence's such as this are indicators of narcotic sales.

On 04-12-2024, Lincoln Police Investigators obtained a residential and vehicle search warrant for Collins residence and vehicle as part of an ongoing narcotic investigation at 620 S 17th St. #1B. Investigators contacted Collins leaving the residence in his vehicle and detained him at approximately 1200 hours. During a search of Collins vehicle, Lincoln Police Investigator Salcedo #1778 located a digital scale behind the front passenger seat.

Investigators contacted Mariah Sanchez (DOB 11-20-1997) inside of 620 S 17th St. #1B who claimed she had a backpack that said 'PINK' on it and a purse but stated she did not live at the residence and had only stayed the night. Your Affiant conducted a search of the backpack and located a snort tube, drug paraphernalia, and a small pink bag with a white crystal-like substance inside. Lincoln Police Investigator Meyer #1716 conducted a search of her purse and located a small bag containing .6 grams of a crystal-like substance. The purse did contain items with Sanchez's name on it.

During a search of the residence, investigators located 16 3.5-gram bags of cannabis flower, 27 self-seal bags containing 3.9 grams of marijuana each, 6.5 grams of cocaine, digital scales, packaging, and \$918 grams of U.S. currency. Investigators know through training and extensive narcotic investigative experience that all of these items located together are indicators of a narcotics dealing operation. Investigators also located an empty handgun magazine and a laser sight, but no firearm was located.

Lincoln Police Sergeant Sorensen #1540 conducted a pretest on the suspected cocaine located in Collin's residence with a positive result for cocaine at 1314 hours. Investigator Meyer conducted a pretest of the substance located in Sanchez's purse with a positive result for amphetamines at 1402 hours. Collins and Sanchez were cited and lodged at the Lancaster County Jail for felony offenses.

Account Preservation

A Preservation Request was served on 04-16-2024 via email to Snapchat, Inc. Snapchat responded with a confirmation email and assigned the preserved data with Snapchat case number **6810d8b797** Snapchat will preserve the data for a period of 90 days and will extend the preservation upon request.

Snapchat Specific Facts

Your AFFIANT knows through their own experiences and those of other Law Enforcement Officers that Snap, Inc. owns and operates a free-access social networking, electronic commerce, and cloud services application(s) of the same name that can be accessed using the Snapchat mobile application(s). Snapchat allows its users to establish accounts with Snapchat, and users can then use their accounts to post "Snaps", "Stories", "Memories", and send and receive "Chats".

"Snaps" are when a user takes a photo or video using their camera phone in real-time and then selects which of their friends to send the message to. Unless the sender or recipient opts to save the photo or video, the message will be deleted from their devices (after the content is sent in the case of the sender and after it's opened in the case of the recipient). Users are able to save a photo or video they've taken locally to their device or to Memories, which is Snapchat's cloud-storage service.

“Stories” are when a user adds photo or video Snaps to their “Story.” Depending on the user’s privacy settings, the photos and videos added to a Story can be viewed by either all “Snapchatters” or just the user’s friends for up to 24 hours. Stories can also be saved in “Memories”.

“Memories” is Snapchat’s cloud-storage service. Users can save their sent or unsent Snaps, posted Stories, and photos and videos from their phone’s photo gallery in Memories. A user can also edit and send Snaps and create Stories from these Memories. Snaps, Stories, and other photos and videos saved in Memories are backed up by us and may remain in Memories until deleted by the user.

Using “Chat” a user can type messages, send photos, videos, audio notes, and video notes to friends within the Snapchat app using the Chat feature. A user sends a Chat message to a friend, and once it is viewed by both parties – and both parties swipe away from the Chat screen – the message will be cleared. Within the Snapchat app itself, a user can opt to save part of the Chat by tapping on the message that they want to keep. The user can clear the message by tapping it again.

“Voice” A user can also make voice and video chats using the Snapchat platform. Video chats can be one-on-one or with a group. Snap chat retains records of these contacts but does not retain content.

“Location” Snapchat users can also share their Live Location with select contacts or all of their friends. This option doesn’t include people who’ve added the user as a friend, but who the user hasn’t added back. Live Location data is shared with the chosen friends even while a user is in Ghost Mode. Users can opt out of Live Location at any time without prompting a notification to your friends. When Live Location sharing is enabled, the device’s precise location data is collected and shared with the selected friends even when the user has the Snapchat app closed.

“AI” Snapchat has added an AI feature. My AI is a chatbot currently available to Snapchatters. In a chat conversation, My AI can answer trivia questions, offer advice, help plan a trip, or make other suggestions. My AI is powered by OpenAI’s ChatGPT technology, with additional safety enhancements and controls unique to Snapchat.

Your AFFIANT is aware through research, documentation, prior training and experience, and/or the experience of other investigators that Snapchat collects and stores personally identifying information on their users. This information consists of user supplied information that can be used to identify the user and/or account creator of a Snapchat account.

This information may include, but is not limited to Basic Subscriber Information collected when a user creates a new Snapchat account, alters information at a later date, or otherwise interacts with the Service, Basic subscriber information may include: Snapchat username, Email address, Phone number, Snapchat user vanity name, Snapchat account creation date and IP address, Timestamp and IP address of account logins and logouts.

This information may also include Logs of Previous Snaps, Stories, and Chats Snapchat retains logs for the last 31 days of Snaps sent and received, for 24 hours of posted Stories, and for any unopened Chats or those saved by a sender or recipient. The logs may contain meta-data about the Snaps, Stories, and Chats, but not the content. Your AFFIANT knows in certain limited circumstances it may be possible for us to retrieve the content of sent Snaps. Story content may be available for up to 24 hours, or until deleted by a user. Your AFFIANT knows Memories content may be available until deleted by a user.

Machine Cookies

Snap Inc. also uses “cookies” to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data stored from the user’s web browser or device, identifiers associated with the user’s device, and other software, are used for similar purposes. “Cookies” are defined in this context as small pieces of text used to store information on web browsers. Companies use “cookies” for the following purposes: Authentication; Security, Site and Product Integrity; Advertising, Recommendations, Insights and Measurement; Site Features and Services; Performance; Analytics and Research, Records of any user accounts that are linked to the Account by machine cookies (meaning all Snapchat user IDs that logged into Snapchat by the same machine as the Account, identifying multiple accounts utilizing similar machines);

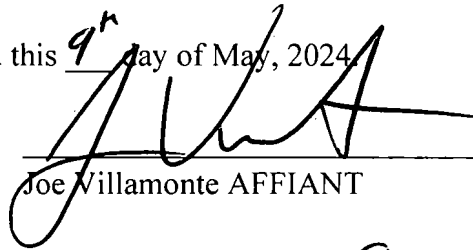
Your Affiant requests authorization to search for and seize the listed items in Attachment A and B, hereby attached and incorporated by reference.

Service Provider shall send the information electronically via email at **LPD1700@LINCOLN.NE.GOV** or to **JOE VILLAMONTE #1700** at the Lincoln Police Department, 575 S 10th Street, Lincoln, NE, 68508.

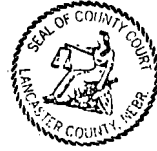
This search warrant shall be executed and returned within ten (10) days to a Clerk of the Lancaster District Court, Nebraska. In the event records are not received from the Service Provider within ten (10) days, your Affiant requests authorization to returned the search warrant within ten (10) days of receipt of the records.

Further AFFIANT saith not;

Dated this 9th day of May, 2024.

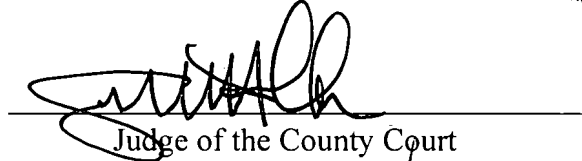


Joe Villamonte AFFIANT

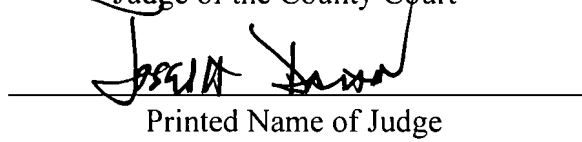


SUBSCRIBED to in my presence and sworn to before me this 9 day of

May, 2024.



Judge of the County Court



Printed Name of Judge