

FOR EXTRADITION

IN THE TRIAL COURT OF CRIM JUSTICE CTR (LAC) JUDICIAL DISTRICT DPT:
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

ARREST WARRANT - FELONY
CASE NO.: BA464483 01
VIOLATION

NAME OF DEFENDANT : SARID, SAHAR

RESIDENCE ADDRESS
CITY/STATE/ZIP



DATE: 07/01/12
CODE: ~~CT02~~ 524
~~CT03~~ 530.5(A)
~~CT04~~ 524
~~CT05~~ 530.5(A)
LOCATION: LA

PC
PC
PC
PC

BUSINESS ADDRESS
CITY/STATE/ZIP

SEX M HAIR BRO EYES BRO HT. 507 WT. 160 RACE W

DATE OF BIRTH :



OPERATORS LIC. NO. :



OTHER DESCRIPTION
BKG. NO. -
VEH.LIC.NO.

ST VEH. YEAR MAKE MODEL STYLE COLOR

THE PEOPLE OF THE STATE OF CALIFORNIA, TO ANY PEACE OFFICER OF THE STATE:
A VERIFIED COMPLAINT WAS MADE BEFORE ME ON THIS DATE THAT THE OFFENSE SET FORTH
ABOVE WAS COMMITTED, AND ACCUSING THE DEFENDANT, NAMED AND DESCRIBED ABOVE.
YOU ARE ORDERED TO ARREST THE DEFENDANT FORTHWITH AND BRING HIM BEFORE ME, OR
IN THE CASE OF MY ABSENCE OR INABILITY TO ACT, BEFORE THE NEAREST OR MOST
ACCESSIBLE MAGISTRATE IN THIS COUNTY.

() MAY BE SERVED AT NIGHT (840PC)

DEFENDANT IS TO BE ADMITTED TO BAIL
(815P.C.) IN THE AMOUNT OF \$1,860,000.00

() BAIL MAY BE FORFEITED

() MANDATORY APPEARANCE REQUIRED.

() DEFENDANT MAY BE RELEASED ON SIGNED
PROMISE TO APPEAR (818/853.6PC.)

INITIALS FOR RELEASE _____

SIGNATURE OF MAGISTRATE
FOR NIGHT SERVICE

3000 LASD - DETECTIVE DIVISION,
AGENCY ORI NO. RESPONSIBLE LEA

3700 LASD - HQ SPEC INVESTIG BU
AGENCY ORI NO. LEA FILING COMPLAINT

LOCAL PD:

SuDL

N. CA. COMP CRIMES TASK FORCE



(COURT SEAL)

Alison M. Estrada 5/10/2018
MAGISTRATE CLERK DATE

Alison M. Estrada
SIGNATURE (X) MAGISTRATE PURGE DATE
() DEPUTY CLERK



THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED IS A FULL, TRUE
AND CORRECT COPY OF THE ORIGINAL ON FILE AND OF RECORD IN MY OFFICE.
SHERRI R. CARTER, EXECUTIVE OFFICER/CLERK OF THE SUPERIOR COURT OF
THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES.

Attested: 5/10/18 BY [Signature] DEPUTY
Diara Reyes

FOR EXTRADITION

IN THE TRIAL COURT OF CRIM JUSTICE CTR (LAC) JUDICIAL DISTRICT DPT:
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

ARREST WARRANT - FELONY
CASE NO.: BA464483 02
VIOLATION

NAME OF DEFENDANT : BHAVNANIE, KISHORE

DATE: 07/01/12

RESIDENCE ADDRESS [REDACTED]
CITY/STATE/ZIP [REDACTED]

CODE: ~~CTD2~~ 524
~~CTD3~~ 530.5(A)
~~CTD4~~ 524
~~CTD5~~ 530.5(A)

PC
PC
PC
PC

BUSINESS ADDRESS
CITY/STATE/ZIP

LOCATION: LA

SEX M HAIR BLK EYES BRO HT. 505 WT. 190 RACE W

DATE OF BIRTH : [REDACTED] OPERATORS LIC. NO.: [REDACTED]

OTHER DESCRIPTION

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Alison M. Estrada

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() DEPUTY CLERK

LOCAL PD: Su DL
[REDACTED]

(COURT SEAL)

N. Ca. COMP CRIMES TASKFORCE
[REDACTED]



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Attested: 5/10/18 [Signature] DEPUTY
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FOR EXTRADITION

IN THE TRIAL COURT OF CRIM JUSTICE CTR (LAC) JUDICIAL DISTRICT DPT:
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

ARREST WARRANT - FELONY
CASE NO.: BA464483 03
VIOLATION

NAME OF DEFENDANT : KEESSEE, THOMAS

DATE: 07/01/12

RESIDENCE ADDRESS
CITY/STATE/ZIP

CODE: *CTD2* 524
CTD3 530.5(A)
CTD4 524
CTD5 530.5(A)

PC
PC
PC
PC

BUSINESS ADDRESS
CITY/STATE/ZIP

LOCATION: LA

SEX M HAIR BLN EYES GRN HT. 600 WT. 170 RACE W

DATE OF BIRTH : [REDACTED] OPERATORS LIC. NO.: [REDACTED]

OTHER DESCRIPTION

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INITIALS FOR RELEASE _____

SIGNATURE OF MAGISTRATE
FOR NIGHT SERVICE

Alison M. Estrada 5/10/2018

MAGISTRATE CLERK DATE

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AGENCY ORI NO. RESPONSIBLE LEA

3700 LASD - HQ SPEC INVESTIG BU

AGENCY ORI NO. LEA FILING COMPLAINT

Alison M. Estrada

SIGNATURE (X) MAGISTRATE PURGE DATE
() DEPUTY CLERK

LOCAL PD:

(COURT SEAL)

S-DL
N. CA. COMP CRIMES TASK FORCE



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Attested: 5/10/18 [Signature] DEPUTY
Digna Rojas

FOR EXTRADITION

IN THE TRIAL COURT OF CRIM JUSTICE CTR (LAC) JUDICIAL DISTRICT DPT:
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

ARREST WARRANT - FELONY
CASE NO.: BA464483 04
VIOLATION

NAME OF DEFENDANT : USDAN, DAVID

RESIDENCE ADDRESS [REDACTED]
CITY/STATE/ZIP

DATE: 07/01/12

CODE: *OTAV* 520
870 530.5(A)
870 520

PC
PC
PC

BUSINESS ADDRESS
CITY/STATE/ZIP

871 530.5(A)
LOCATION: LA

SEX M HAIR BRO EYES BRO HT. 508 WT. 145 RACE W

DATE OF BIRTH : [REDACTED] OPERATORS LIC. NO. : [REDACTED]

OTHER DESCRIPTION

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() MAY BE SERVED AT NIGHT (840PC)

DEFENDANT IS TO BE ADMITTED TO BAIL
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SIGNATURE OF MAGISTRATE
FOR NIGHT SERVICE

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LOCAL PD:

(COURT SEAL)

S=DL
[REDACTED]
N. CA. COMP CRIMES TASK FORCE
[REDACTED]



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Attested 5/10/18 BY *[Signature]* DEPUTY
Diana Reyes

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

FILED
2010 MAY 10 AM 8:52
CENTRAL DISTRICT COURT
LOS ANGELES SUPERIOR COURT

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

SAHAR SARID (██████████), KISHORE
BHAVNANIE (██████████), THOMAS KEESEE
(██████████), and DAVID USDAN (██████████),

Defendants.

Case No. BA464483

DECLARATION OF INSPECTOR SARA
DELANEY IN SUPPORT OF ARREST
WARRANTS

INTRODUCTION

The undersigned, ██████████ declares that she is an Inspector with the Northern California Computer Crimes Task Force. She has conducted an investigation of the web domain Mugshots.com under HT16-094. This investigation showed that between the dates of January 15, 2014 and January 26, 2017, Mugshots.com extorted at least 175 individuals, with billing addresses in the State of California, totaling approximately \$64,737, for the removal of booking photos containing personal identification information. In total, Mugshots.com extorted at least 5,703 individuals, throughout the United States totaling approximately \$2,422,924, for the removal of booking photos. Inspector ██████████ interviewed 18 California residents who have been victims of the Mugshots.com website. Five of those victims reside in Los Angeles County.

This declaration is in support of Arrest Warrants for Sahar Sarid, Kishore Bhavnanie, Thomas Keese, and David Usdan.

AFFIANT'S EXPERTISE

Your affiant, [REDACTED] is a District Attorney Inspector employed by the Marin County District Attorney's Office since November 2008.

Prior to my employment with the Marin County District Attorney's Office, I was a police officer for a Municipal Police Department in Orange County from July 1982 through November 2008. When I left the agency, I held the position of Sergeant in the Special Investigations Unit. This unit was primarily responsible for the investigation of narcotics, vice, gang-related crimes, and other investigations of a sensitive and/or political nature as assigned by the Chief of Police.

My investigative experience started when I was assigned to the Investigations Bureau from December 1989 to June 1991. During that time, I worked the Economic Crime detail and conducted over 200 investigations involving counterfeit credit cards, embezzlements, checks, and other types of "paper" crimes. I prepared and executed over 20 fraud-related search warrants while working this detail. Between 1993 and 1994, I worked in the Narcotics Unit, where I prepared and executed approximately 20 narcotics-related search warrants. In September 1997, I was reassigned to the Economic Crime/Property Division of the Investigations Bureau and later reassigned to the Robbery/Homicide Detail. During this time, I prepared and executed approximately 90 search warrants. Fourteen of the 90 search warrants pertained to three unrelated homicides.

I authored a State Wiretap Affidavit in June of 2001, which resulted in the apprehension of a suspect wanted for homicide and robbery. In August 2001, I was promoted to Sergeant and transferred to Patrol.

In April 2006, I was assigned to supervise the Special Investigations Unit. I supervised four officers and approved approximately 15 search warrants. I conducted an extensive money-laundering investigation on a narcotics seizure, which lead to the suspect being charged with 20 counts of money laundering.

I received certain Peace Officer Standards and Training (P.O.S.T.)-approved training that focused on and/or included investigation. This training included, but was not limited to, the following: Officer Safety/Field Tactics (40 hours), Hostage Negotiations (32 hours), Advanced Hostage Negotiations (20 hours), Traffic Accident Investigation (40 hours), Skid mark Analysis (40 hours), Questioned Documents (38 hours), Basic Narcotics (80 hours), Homicide Investigation (40 hours), Officer-Involved

Shooting Investigation (32 hours), Basic Narcotics (80 hours), Drug Abuse Recognition (8 hours), Supervisory Course (80 hours), Internal Affairs Investigation (24 hours), Racial Profiling Trainer Course (24 hours), Terrorism-Emergency Response (16 hours), Basic Asset Seizure (32 hours), Asset Forfeiture in Financial Investigations (32 hours), Gang Investigative Techniques (8 hours), Narcotics Supervisor Course (40 hours), and Drug Asset Forfeiture Update (15 hours).

As a District Attorney Inspector with the Marin County District Attorney's Office, my duties and responsibilities include, but are not limited to, the investigation of real estate fraud, financial elder abuse, child abduction, and political corruption. During this time, I have written and executed approximately 85 search warrants that primarily involved financial investigations. Additional P.O.S.T.-approved training I have received included Investigation and Trial Preparation (80 hours), Real Estate Fraud Investigations (32 hours), Public Records Act (16 hours), Social Media (16 hours).

Additionally, I was assigned to the North Bay Bank Secrecy Act Task Force (NBBSATF), Oakland Field Office, San Rafael, California. My duties and responsibilities as a part-time federal Task Force Officer (TFO) with the Internal Revenue Service-Criminal Investigation (IRS-CI) were to investigate possible criminal violations of the Money Laundering Control Act of 1986, Title 18 United States Code Sections 1956 and 1957 (18 USC §§ 1956 and 1957), and various sections of Title 31. When assigned to the Task Force, I received training in Bank Secrecy Act Investigation (24 hours), Money Service Business Investigation (24 hours), and Bank Secrecy Act Reports Review (24 hours). In the course of my assignment with the NBBSATF, I have conducted or have been involved in numerous investigations of alleged criminal violations, which have included: money laundering (18 USC §§ 1956 and 1957); operating an unlicensed money transmitting business (18 USC § 1960); structuring (31 USC § 5324(a)); Form 8300 violations (31 USC § 5324(b)(1)); Reports on Exporting and Importing Monetary Instruments (31 USC § 5316); and Conspiracy (18 USC § 371).

In August, 2016, I was selected as a Detective for the Northern California Computer Crimes Task Force (NC3TF). In preparation for this assignment, in January of 2016, I completed a course in Computer Crimes and High Tech Investigations (CCI), conducted by the California Department of Justice, (36 hours) and in April of 2016, I completed a course in Computer Crime Pre-search conducted by the California Department of Justice, (16 hours).

The NC3TF is one of five multi-jurisdictional High Tech Task Forces established by the State of California High Technology Theft Apprehension and Prosecution Program (Pen. Code §13848). My role,

and that of NC3TF, is to investigate computer-related crimes, such as large-scale identity theft, phishing schemes, network intrusions, computer hacking, counterfeiting and piracy, theft of trade secrets, theft of high tech-related equipment, telecommunications fraud, cyber stalking, cyber extortion, and intellectual property theft. NC3TF also conducts comprehensive forensic investigations of high tech equipment for evidence of crimes against persons, including murders, attempted murders, and assaults with deadly weapons, criminal street gangs, robberies, sexual assaults, child pornography, property crimes, fraud, and identity theft.

Throughout my career, I have participated in the execution of state and federal search warrants involving the seizure of contraband and records relating to the concealment of assets and proceeds from fraud, and the execution of consensual searches of records. These records have included, but were not limited to, telephone bills, personal telephone books, e-mails, photographs, and letters that have identified co-conspirators and others involved in the fraud, records pertaining to the purchase of real and personal property, bank records, escrow records, credit card records, tax returns, business books and records, and computer hardware and software.

Unless stated otherwise, I have personal knowledge of the matters set forth in this affidavit. To the extent that any information in this affidavit is not within my personal knowledge, it was made known to me through my own review of the documents discussed in this affidavit, and through reliable law enforcement sources, including discussions with other law enforcement agents. While this affidavit does not contain every piece of evidence discovered to date, it does not omit evidence that would defeat the probable cause established herein.

I received my Bachelor of Arts Degree in Psychology from California State College at Fullerton. While continuing to work as a police officer, I earned my law degree, graduating cum laude from Western State College of Law and hold a Juris Doctorate Degree. During my course work, I took classes in Criminal Law, Criminal Procedure, and Advanced Criminal Procedure. I was awarded the American Jurisprudence award for Legal Writing I and for Evidence II. I am an active member of the State Bar.

I have read the California District Attorneys Association Search Warrant Manual, 11th Edition.

FACTS ESTABLISHING PROBABLE CAUSE

Jesse T.

California resident Jesse T. complained to the NC3TF he was a victim of the website domain, Mugshots.com. This complaint was assigned to your affiant as case HT16-094. Jesse T. was interviewed and an investigation was initiated.

On September 6, 2016, I interviewed Jesse T., a resident of Sonoma County. On September 2, 2013, Jesse T. was arrested and booked into the Sonoma County Jail where he was photographed and his fingerprints were taken. He was released on September 14, 2013, and was not charged with a crime. His arrest was considered a detention only.

After his arrest, Jesse T. applied for jobs in the electrical field, construction, manufacturing, and labor. Jesse T. estimates he put in 100 applications but received zero response. He never received return calls or emails, or requests for interviews.

On September 1, 2014, Jesse T. was contacted by a friend, who told him she was searching for him online. She told him she did not know what to think when she saw he had been arrested, and thought he might be in prison. Jesse T. was astounded and embarrassed and asked her what she was talking about. She told him to Google his name. When he did, he saw the arrest information from September 2, 2013 had been posted on Mugshots.com, listing his full name, address, gender, and the charge for which he was arrested. There was no information on the website indicating he was not charged or convicted of the crime and the arrest was considered a detention only.

On the Mugshots.com website, Jesse T. saw there was link to unpublisharrest.com. When he clicked on the link, a page opened that read he must pay a minimum of \$399 to have his information removed. He called the (800)810-3965 number listed on the page and a man told him he needed to pay the \$399. When Jesse T. told him this was illegal, the man laughed and hung up. Jesse T. called back to explain he had proof clearing him of the charges and the man hung up again.

On July 23, 2016, Jesse T. called the number (800) 810-3965 on the unpublisharrest.com website three times. Each time, the call went to a recording. After the third call, at 8:08 a.m., his home phone rang and he saw the caller identification on the phone was unlisted. He turned on his recorder and answered. Jesse T. played for me the following message:

Jessie T.: Hello

Unknown male: -this third time tell you fucking bitch we'll never answer your calls again you've been permanently published faggot bitch.

Jessie T.: Hey I'd like my stuff removed.

Call ended.

Jesse T. said because his information has been posted, he has been unable to get work. Some of his family and friends have found the arrest information, and have asked Jesse T. about it, causing him embarrassment and shame. He started a relationship two years ago and after two days of talking, and everything going well, she suddenly stopped talking to him. Jesse T. believes it is because she ran an internet search and saw he had been arrested. Jesse T. said he has been humiliated and it has ruined any reputation he may have had. The interview concluded.

I ran Jesse T. through the California Law Enforcement Telecommunications System (CLETS). From his Department of Motor Vehicles printout, I saw he had a former address in Santa Rosa. From the Department of Justice criminal history printout, I saw on September 2, 2013, Jesse T. showed an arrest by the Santa Rosa Police Department. The printout showed the disposition for the arrest was "detention only -lack of sufficient evidence."

Pulling up the website, of Jessie T.'s full name showed a mugshots identification number and Jessie T.'s former address in Santa Rosa.

S. Shaw

On November 14, 2016, I interviewed S. Shaw who told me her booking photo posted on Mugshots.com was from a drug arrest in Arkansas in November of 2005. She was convicted and served her time. In September of 2012, she learned her booking photo had been posted on Mugshots.com when she was setting up a play date for her daughter with a classmate. The classmate's mother Googled Shaw and saw her booking photo. The mother told Shaw her daughter was not going to play with the daughter of a drug dealer, and they did not belong at the same school.

Shaw was livid and Googled herself. When she found her booking photo on Mugshots.com, she called the number on the page and asked to have it removed. She spoke with a man who told her they would remove the booking photo if she paid the fee. Shaw hung up and started doing her own research. She saw other people had posted they had paid Mugshots.com to remove their booking photos, but the same photo would then be posted on similar websites. Shaw went on the website on a later date to see how much it would cost to remove the booking photo, but she did not have the money.

Shaw said she believes she has lost jobs because of the photo. She has applied for several jobs and has not received second interviews. At one job, a coworker told her she saw her booking photo but did not tell the employer. Shaw said it is "scary" because it is hanging over her head.

Shaw said she is still with the father of her daughter, and he is aware of the conviction. Having her booking photo on line is still a strain because other people have located her photo and it is an embarrassment for herself, her spouse and his family.

Rosa S.

On September 28, 2017, I interviewed Rosa S., a resident of Ventura County. Rosa S. said she was formerly married to Tony C. and they had two children. Her now adult son has the same name as his father. In 1998, her husband went to jail for a night, but was not charged with a crime, and did not have a criminal history. In 2002, he committed suicide.

As Rosa S. was telling her story, she became emotional and started crying. At times, it was difficult to understand her. One reason she was so upset was because her former husband was not alive to be able to defend himself. When an internet search is run on her son's name, the first link that comes up is the booking photo of her former husband, Tony C.

Rosa S. called Mugshots.com to tell them the Tony C. died several years ago. When she asked to have the photo removed because her husband was dead and the posting was painful for her children, she was told she would have to pay to have it removed. When I asked if the amount was \$399, she said she thought it was more. Rosa S. said what Mugshots is doing is very ugly, and they are profiting from people's pain.

After the phone call, I went to Mugshots.com and located a booking photo in the name of Tony C. Rosa S. confirmed it was her dead husband.

Other California residents were interviewed, including five residents of Los Angeles County.

David G.

On August 5, 2017, I met with David G., a resident in Los Angeles County. David G. was arrested in 2003 Utah on a rape charge. He was convicted and served 9 years in prison. From the Utah Supreme Court's opinion, the accuser lied about material facts during her testimony and his charges were overturned. David G. was released in 2012.

Within a few months of his release from prison, David G. learned through an internet search that his booking photo was posted on Mugshots.com. The photo was not from his original arrest, but from a

prison photo and had his image, date of birth and arrest charges. Sometime in 2012 or 2013, David G. contacted Mugshots.com to tell them his conviction had been overturned. He spoke with a male who seemed pleasant, and was not threatening or difficult. They would not take off the photo without his paying the fee. In 2016, David G. contacted Mugshots.com and paid \$500 to have his photo removed.

David G. does not have direct evidence if the posting of his photo has affected any of his relationships, but from the time he knew his photo was on the internet, until he paid to have it removed, he said he lived in fear. David G. started a business when he was released from prison, and he was afraid if clients saw the posting, it would ruin his business. He was also afraid it would destroy any personal relationships he was hoping to begin.

Chris I.

On August 6, 2017, I met with Chris I., a resident of Los Angeles County. Chris I. had attended an out of state university where he majored in economics. On April 25, 2014, he attended a fraternity event at a bar with other college students. The police were called and ordered the students to leave. When the students were not leaving fast enough, the police began to randomly arrest students for trespassing. The police officer who arrested Chris I. added additional charges of disorderly conduct and resisting arrest. Chris I. retained an attorney and the surveillance video from the bar was obtained. The video showed Chris I. was not guilty of the crimes for which he had been arrested, and the charges against him were dropped.

After he graduated, Chris I. was going on with his life when he received a text from a friend, with a picture of his booking photo from the 2014 arrest. Chris I. Googled his name and found his booking photo posted on the Mugshots.com website. He was in the middle of the interview process with several financial entities, and he realized why he was not getting call backs or second interviews. Chris I. was upset his booking photo was plastered on a website along with the booking photos of rapists and murderers. When he called the Mugshots.com website, Chris I. said he got emotional and told them they were unethical.

In March of 2016, Chris I. had been to two interviews through Northwestern Mutual, and was hoping to get hired. When he did not get a call back for a third interview, he decided to pay the website to have his photo removed.

On March 22, 2016, Chris I. went to the Mugshots.com website and clicked on the third party service to have his photo unpublished. He called the Mugshots.com (800) number and tried to explain his charges had been dropped, and he was not a threat to the community as others posted on the website. He paid the \$399 fee to have his photo removed.

Doug R.

On August 23, 2017, I interviewed Douglas R. a resident of Los Angeles County. Doug R. said he was at a Walmart in Florida in 2015, and was wrongly accused of shoplifting. He was arrested and his booking photo was taken, but charges were never filed. Walmart later sent a letter to Doug R. in apology. Within 72 hours of the arrest, Doug R. discovered his booking photo had been published on Mugshots.com and on other booking photo websites.

Doug R. works in the entertainment industry as an actor and writer, and has a public internet identity. As an actor, Doug R. is always auditioning for roles and he is concerned he may have been denied some jobs because those making casting decisions saw his photo on the internet. Several of his family members and friends have seen the photo and asked him about it.

When Doug R. researched Mugshots.com, he discovered the only way to remove the photo was to pay to have it taken down. On October 20, 2015, Doug R. paid \$399 to Mugshots.com. In total, he spent over \$4,000 to remove the photo from several different websites. Doug R. said he did not speak with anyone at Mugshots.com because everything was internet based.

K.H.

On May 25, 2017, I interviewed K.H. by phone. Approximately 3 to 4 years ago, K.H. learned his information was posted on Mugshots.com when his wife Googled his name and told him. Although K.H.'s booking photo had not been posted, his arrest information had been posted, which he said was not accurate. He did not give the website permission to post his personal information.

K.H. said he has only had one contact with law enforcement resulting in a theft arrest that occurred in Clark County, Nevada on July 12, 2013. He was not charged and did not have to appear in front of a judge or go to court. The arrest should not be on his record.

When K.H. called Mugshots.com he believes he spoke with a woman. He was told the information was a public record and in order to have the arrest information removed, he would have to pay by Western Union, cashier's check or credit card. He does not have the money to pay. He has called them more than once, but they will not remove his information without his paying.

K.H. has been unable to find employment for the last two years and believes the Mugshots.com posting may be responsible. He recently obtained his real estate license, and believes the posting has prevented him from obtaining clients to list their properties. Because of his unusual name, the Mugshots.com arrest information pops up first when an internet search is run. K.H. said he has submitted over 100 employment applications but has not been able to find a job.

On June 3, 2017, I ran an internet search on the K.H.'s name. The name was posted on Google's opening page in the #6 position. K.H.'s full name, age, race, sex and arrest charges as well as the date of arrest was posted on the Mugshots.com website.

Sam T.

On August 4, I met with Sam T., a resident of Los Angeles County. On July 15, 2012, Sam T. was arrested in Arizona for causing a disturbance at an airport, but was not charged. Sam T. first learned he was posted on Mugshots.com when a friend told him. At the time, Sam T. was a student at an engineering college. He was at a networking event when his professor asked him about the arrest in front of another professor and other students. Sam T. said this caused him physical stress and he was treated differently because of it. Eventually, he sought psychological counseling.

On July 6, 2015, Sam T. paid \$399 to Mugshots.com to have his photo removed. He showed me his Wells Fargo bank statement with the transaction and said he was broke at the time and the payment took a third of his money.

An additional 8 victims in other California counties were located and interviewed.

INVESTIGATION

Mugshots.com is a website that publishes the names, booking photographs, arrest information, and the personal identifying information (PII) of individuals who have been arrested. The booking photographs, arrest information, and PII, are posted on Mugshots.com without the permission, consent, or knowledge of the victims. The purpose of displaying the booking photographs and associated information is to expose or impute the individual displayed has committed a crime, without confirming if the allegation is, in fact, true. Many individuals who have been arrested may want to keep the arrest and charges confidential or secret. Some individuals have been falsely arrested through mistaken identity or law enforcement error. Other individuals may have had the charges against them dropped, dismissed, or disposed without a conviction. Mugshots.com continually exposes confidential information by publishing the information on the website, and demands a fee, generally \$399.00 per posting, for the information to be removed, in violation of California Penal Code Section 518, extortion, a felony.

Until recently, Mugshots.com used a takedown website, Unpublisharrest.com, to process the requests of victims seeking to have their booking photographs and associated information removed. Use of "takedown" websites is a practice used by those involved in posting reputation-damaging material in an attempt to shield themselves from legal consequences and to use freedom of speech theories in justifying

the activity. The domain posting the information, in this case Mugshots.com, holds itself out as a separate entity from the takedown website that monetizes the removal of information, in this case Unpublishtarrest.com. The motive behind posting the damaging material is financial gain, and requires, at minimum, a contractual relationship between the posting website and the takedown website(s). Often the two websites are actually owned and/or operated by the same individual(s).

Mugshots.com and Unpublishtarrest.com conduct business in the State of California, but both appear unauthorized to do so. Queries of the California Secretary of State indicate no businesses registered in those names as required by Section 2105(a) of the California Corporations Code. Mugshots.com solicits customers in California by posting booking photos and arrest information related to arrests by California law enforcement agencies. The booking photos have commercial value and are being used for a commercial purpose as indicated by the profit made by the website. Mugshots.com derives additional revenues through paid advertising on the website.

As of January 1, 2015, California Civil Code Section 1798.91.1, Subdivision (b) makes it unlawful for “any person engaged in publishing or otherwise disseminating a booking photograph through a print or electronic medium to solicit, require, or accept the payment of a fee or other consideration from a subject individual to remove, correct, modify, or to refrain from publishing or otherwise disseminating that booking photograph.” By posting the booking photograph online, and requiring a fee to have it removed, the owners and operators of Mugshots.com and Unpublishtarrest.com are operating their websites for an unlawful purpose.

California Penal Code Section 530.5 defines identify theft, stating: “Every person who willfully obtains personal identifying information . . . of another person, and uses that information for any unlawful purpose. . . without the consent of that person, is guilty of a public offense”. Section 530.55 identifies a “person” as a natural person, firm, company, corporation or any other legal entity. The section defines “personal identifying information” as any “name, address . . . or other unique physical representation.” Because Mugshots.com and Unpublishtarrest.com have used, and continue to use, the booking photographs and PII of individuals for purposes of selling the service of removing the photographs and information, the owners are in violation of California Penal Code Section 530.5, identity theft, a felony.

In 2012, Attorney Scott Ciolek filed a putative class action lawsuit against Mugshots.com and other booking photo websites. Ciolek was unable to locate the owners of Mugshots.com to serve them. Ciolek provided me with a list of other California residents who had contacted him, reporting they were also

victims of Mugshots.com. During the course of this investigation, I interviewed 17 additional victims who had been victimized by the Mugshots.com website.

On December 16, 2016, the Judge Sharon Lueras of the Sacramento County Superior Court, authorized search warrants for Google Inc., DreamHost LLC, PeopleFindersDAAs Inc., IFN.COM Inc. (DBA: TollFreeForwarding.com), and Amazon Technologies Inc. Records obtained from these entities identify Thomas KEESEE and Kishore BHAVNANIE as operating and profiting from the Mugshots.com website and the takedown websites Unpublisharrest.com and Unpublish.com. The records also identified financial accounts and additional e-mail addresses associated with the business.

On February 21, 2017, the Judge Sharon Lueras of the Sacramento County Superior Court, authorized search warrants for Google Inc., Yahoo! Inc., Amazon Technologies Inc., Comcast Cable Communications, and TransUnion Credit Bureau. Records obtained from these entities and from court records identify Sahar SARID as an additional owner, who was also profiting from MUGSHOTS.COM.

On April 14, 2017 the Judge Sharon Lueras of the Sacramento County Superior Court, authorized search warrants for Bank of America, Google Inc., and Yahoo! Inc. These records bank records and e-mails furthered this investigation.

The owners and operators of Mugshots.com have attempted to conceal their identities by listing the business address in Nevis, West Indies, registering their domain name in Belize, and using a website hosting company in Australia.

Mugshots.com was initially formed as a Limited Liability Company in Delaware on July 7, 2011, but was dissolved on March 27, 2012, by attorney Marc Epstein. Unpublish.com was formed in Wyoming and filed through the Florida Secretary of State as a Foreign Limited Liability Company in 2013, with correspondence to be directed to Marc Epstein. Epstein resigned on December 1, 2013.

The Mugshots.com website changed the takedown website from Unpublish.com to Unpublisharrest.com. Unpublisharrest.com was filed in Wyoming in 2012 by Hammermill & Masterson as a Limited Liability Company, and later in Florida as a Foreign Limited Liability Company. The managing member was listed as Thomas KEESEE. The State of Wyoming shows the status as dissolved on March 21, 2014 and the State of Florida shows the status as inactive with a withdrawal date of March 20, 2014.

By using entities outside of the United States, and by hiding behind dissolved or inactive limited liability companies, the owners avoid service of process by those who have been injured through their business practices, giving their victims no recourse to seek damages.

Sahar SARID, Kishore BHAVNANIE, and Thomas KEESEE, the owners/operators of Mugshots.com, all use one or more legal entities with no apparent tie to Mugshots.com to share in the profits, and to transfer funds out of the United States to offshore financial accounts. These entities are used in an attempt to shield them from accountability, civil judgment, and criminal prosecution.

Public Access to Court Electronic Records (PACER) records show that many of the subjects under criminal investigation in this case are currently defendants in a class action lawsuit filed in the Circuit Court of Cook County, Illinois, Chancery Division, as case No. 1:16-cv-02076. Defendants listed include Thomas KEESEE, Marc Epstein, Mugshots.com LLC, Unpublish LLC, Hammermill & Masterson LLC, and Sahar SARID.

Sahar SARID

A public database search for Sahar SARID indicates that his date of birth is [REDACTED] and he is assigned Social Security Number [REDACTED]. His current address is listed as [REDACTED].

The PACER records reveal that on August 24, 2016, the first amended complaint for case No. 1:16-cv-02076 was filed. The complaint alleges Sahar SARID founded the Mugshots.com website in 2008, and retained Marc Epstein as his attorney. In 2011, Mugshots.com began to receive negative media attention, and SARID sold the company to "Michael Robertson" through eBay. Either Robertson does not exist, or he is a straw person making no decisions in the company. Despite the eBay sale, SARID retained ownership of Mugshots.com, and in 2011, conspired with others to create the takedown website, hiring Thomas KEESEE, the owner of Hammermill & Masterson LLC, to operate the sales and customer service. The takedown website later transitioned to Unpublisharrest.com.

In his Motion to Dismiss the First Amended Complaint by Defendant Sahar SARID, SARID did not challenge the allegations he is the owner of Mugshots.com.

Hammermill & Masterson bank account records produced by Wells Fargo Bank reveal that from June 16, 2016 through February 16, 2017, numerous payments were made to a business account, DigiCard LLC, at Bank of America. The payments totaled \$245,398.98, and averaged \$27,266.55 per month.

A public database search via Texas Comptroller indicated that DigiCard LLC was formed in Texas in 2003 by Manager Shunit Sarid, SARID's sister, with a Texas Taxpayer number of [REDACTED]. Public database records indicate the business address of DigiCard, LLC to be SARID's residence, [REDACTED]. On Shunit Sarid's public index check, a possible employer of NTI-Digi Card LLC is listed as of 2016. Bank records show NTI-Digi Card LLC has a TIN of [REDACTED].

The Sarid family appears to profit from the Mugshots.com domain. Sahar SARID is the owner, and his mother Aliza Sarid handles some of the financial transactions as indicated by e-mail records produced by Google Inc. and Yahoo! Inc. Profits generated from the Unpublishtarrest.com website are transferred into the Hammermill & Masterson account, and then laundered through DigiCard LLC. This would indicate Sahar SARID is continuing to profit from the Mugshots.com business.

Thomas KEESEE

A public database search for "Thomas KEESEE" lists one "Thomas Herbert KEESEE" with a date of birth of [REDACTED], assigned Social Security Number [REDACTED]. A current address of [REDACTED] is listed. Law enforcement database queries reveal KEESEE has a criminal history in the State of Florida as well as the State of Illinois.

Bank account records produced by Wells Fargo Bank, show Thomas KEESEE is the only signer on the Hammermill & Masterson, LLC account. This account facilitates the business of the websites, indicated by payments to the employees who answer the phones, payments for retaining attorneys, and payment of phone bills for the (800) number on the takedown website. This account also receives money from merchant vendors who process the credit cards of victims who pay to have their booking photos removed.

E-mail records produced by Google Inc. and Yahoo! Inc. indicate Thomas KEESEE uses an alias of "Chase Johnson" as he manages the daily operations of the takedown website via two (2) e-mail accounts, unpublishtarrest@gmail.com and unpublishtarrest@yahoo.com. When sending e-mail to "Chase Johnson", co-conspirators will sometimes refer to him as "Tom". One (1) e-mail from Cleansearch.net on March 27,

2015, reads, "Chase, we have protected your identity for a year. This is our server the domain Thomaskeesee.com points to . . ."

KEESEEE gives direction and provides a script for the two or three employees answering the (800) number the victims call. Bank account records produced by Wells Fargo Bank indicate KEESEEE is paying employees in cash and show checks written out to cash by KEESEEE with notations in the memo line reading "payroll", often with the employee's name. KEESEEE's payments to his employees are in cash and in round dollar amounts. This indicates KEESEEE is likely attempting to evade state and federal taxes as well as various state and federal employment regulations.

E-mail records produced by Google Inc. indicate the employees also use aliases. While no e-mail correspondence was located with anyone named "Jean Houser", KEESEEE wrote payroll checks to cash with that name in the memo line until June of 2013. Also in June of 2013, based on review of e-mail records, an employee using the alias "Melanie Jones", who controlled the unpublisharrest4@gmail.com account, was terminated. This indicates that "Melanie Jones" was an alias for employee Jean Houser. Records indicate other employees to be using aliases of "Jay Thomas" at unpublisharrest2@gmail.com, and "Eric Howard"/"Tony Howard"/"Derek Howard" at unpublisharrest9@gmail.com.

Kishore BHAVNANIE

A database search of public records for "Kishore BHAVNANIE" lists one Kishore BHAVNANIE, date of birth [REDACTED], with an assigned Social Security Number of [REDACTED]. A current address of [REDACTED] is listed.

Bank records for DigiCard, LLC show funds transfers to Kishore BHAVNANIE at Wells Fargo Bank totaling \$643,752. The DigiCard records show \$201,010 wired to Adrianna Consultants, an account at Wells Fargo Bank. The Secretary of State database in Pennsylvania showed Adrianna Consultants was incorporated on August 28, 2015. Kishore BHAVNANIE was listed as the only incorporator, and the business address was listed as [REDACTED], BHAVNANIE residence address.

Kishore BHAVNANIE used the alias of "Bravia Stoli" on the account records produced by DreamHost in response to the search warrant. A search of publicly available Internet Protocol (IP) address information indicates the IP addressed associated with the account originated in or around Lehigh County, Pennsylvania, where BHAVNANIE's was known to be residing at the time.

Kishore BHAVNANIE also uses the alias of "Jeff Eskaycee" as indicated by the e-mail of jeff@[REDACTED].com used on the account records that were produced by IFN.COM in response to a search warrant. A search of publicly available IP address information indicates the IP address associated with the account originated in or around Lehigh County, PA, where BHAVNANIE's was known to be residing at the time. This e-mail was later changed to [REDACTED]@[REDACTED].

Google records indicate BHAVNANIE also uses the e-mail address of [REDACTED]@gmail.com. BHAVNANIE created the account and made the initial payments to DreamHost, the web hosting company that hosts the domain UNPUBLISHARREST.COM. Records also indicated a second e-mail associated address, [REDACTED]@gmail.com, during the initial setup of the DreamHost account.

Google account records for [REDACTED]@gmail.com indicate the name of the subscriber is "Bravia Stoli", with a recovery e-mail of [REDACTED]@gmail.com. A search of publicly available IP address information indicates the IP address (24.115.236.222) for this email account originated in or around Lehigh County, PA, where BHAVNANIE's was known to be residing at the time.

Google account records for [REDACTED]@gmail.com indicate the name of the subscriber is "[REDACTED]" with the same recovery e-mail address of [REDACTED]@gmail.com and a phone number of ([REDACTED]) [REDACTED]. A public records query for this number indicates it is associated with "Aliza Sarid".

E-mail records produced by Google, Inc. in response to a search warrant shows additional e-mail addresses for Kishore BHAVNANIE as [REDACTED]@gmail.com and [REDACTED]@gmail.com.

E-mail records produced by Google Inc. indicate that the individual operating the [REDACTED]@gmail.com account is actively involved in the maintenance of the Mugshots.com website. As Thomas KEESEE and his employees' process orders from victims paying to have their booking photos removed, an e-mail was sent to [REDACTED]@gmail.com, advising of the payment and requesting the victim's posting on Mugshots.com be removed.

Based on the totality of the account data and e-mail records, I believe BHAVNANIE was responsible for the removal of arrest postings on Mugshots.com, which victims have paid to be taken down.

BHAVNANIE may still be responsible for these removals.

David USDAN

E-mail records produced by Google Inc. in response to search warrants, reveal email exchanges between Thomas KEESEE and David USDAN. USDAN is an employee of Mugshots.com and tasked with answering victim phone calls for the (800) phone number and processing orders for the removal of listings on the site via e-mail. This includes processing credit card transactions, handling charge-backs, and resolving transaction issues along with the guidance of KEESEE, his supervisor.

On June 16, 2013, using an e-mail address of unpublisharrest9@gmail.com, new employee USDAN confirmed to KEESEE that he had set up this address with an alias of "Tony Howard." He confirmed his full name as "David USDAN" and address of "[REDACTED]" In an e-mail sent on January 20, 2017, USDAN gave his social security number as [REDACTED]. On January 19, 2017, USDAN provided a new address of [REDACTED]. A search of the Town of Harwinton Assessor's Office database on April 2, 2018, lists USDAN as the current owner of [REDACTED]. Bank records produced by Wells Fargo Bank for Hammermill & Masterson accounts reveal that KEESEE paid USDAN by writing checks for cash with "Usdan payroll" or "Usdan" in the memo line.

A database search of public records for the social security number provided by USDAN returns to David USDAN, with a date of birth of [REDACTED], and a current address of [REDACTED]. A prior address is shown as [REDACTED].

E-mail records produced by Google Inc. indicate that on January 31, 2017, KEESEE and USDAN were involved in an argument which resulted in KEESEE firing him. On February 1, 2017, e-mails were exchanged where KEESEE and USDAN agreed USDAN should end his employment with Mugshots.com. KEESEE requested USDAN delete all "e-mails from all folders, all accounts...including sent files...your #9 account should be bare. In both our best interests."

On February 6, 2017, USDAN sent an e-mail to KEESEE, addressed to "Mr. KEESEE", stating that he was still receiving eight (8) to ten (10) e-mails per day related to Mugshots.com posting removal.

On February 8, 2017, USDAN e-mailed KEESEE that he may receive a call from the Connecticut Unemployment Office to verify USDAN had been laid off due to restructuring of the business. USDAN stated "Don't worry, I didn't mention anything about MS or Unpublish (I know better than that)."

On March 2, 2017, an e-mail shows that USDAN had been rehired by KEESEE, and USDAN was checking his login and password for the unpublisharrest9@gmail.com e-mail address.

YMXA, LLC

YMXA, LLC was identified as the payment processor for the credit card transactions of individuals who paid to have Mugshots.com booking photos removed. A payment processor is a company, often a third party, appointed by a merchant to handle transactions from various channels such as credit cards and debit cards for merchant acquiring banks.

Hammermill & Masterson account records received from the search warrant revealed that YMXA, LLC had made deposits into the Hammermill & Masterson account totaling \$35,535 from a Wells Fargo Bank account (No. [REDACTED]). Additionally, there were several cashier checks totaling \$106,409 deposited into the Hammermill & Masterson account and with remitters listed on the cashier checks of Joshua Allen or Benjamin Avilla. Several other cashier checks from Wells Fargo Bank were deposited with no listed remitter but originated from Wells Fargo branches in the Orange County and San Diego area.

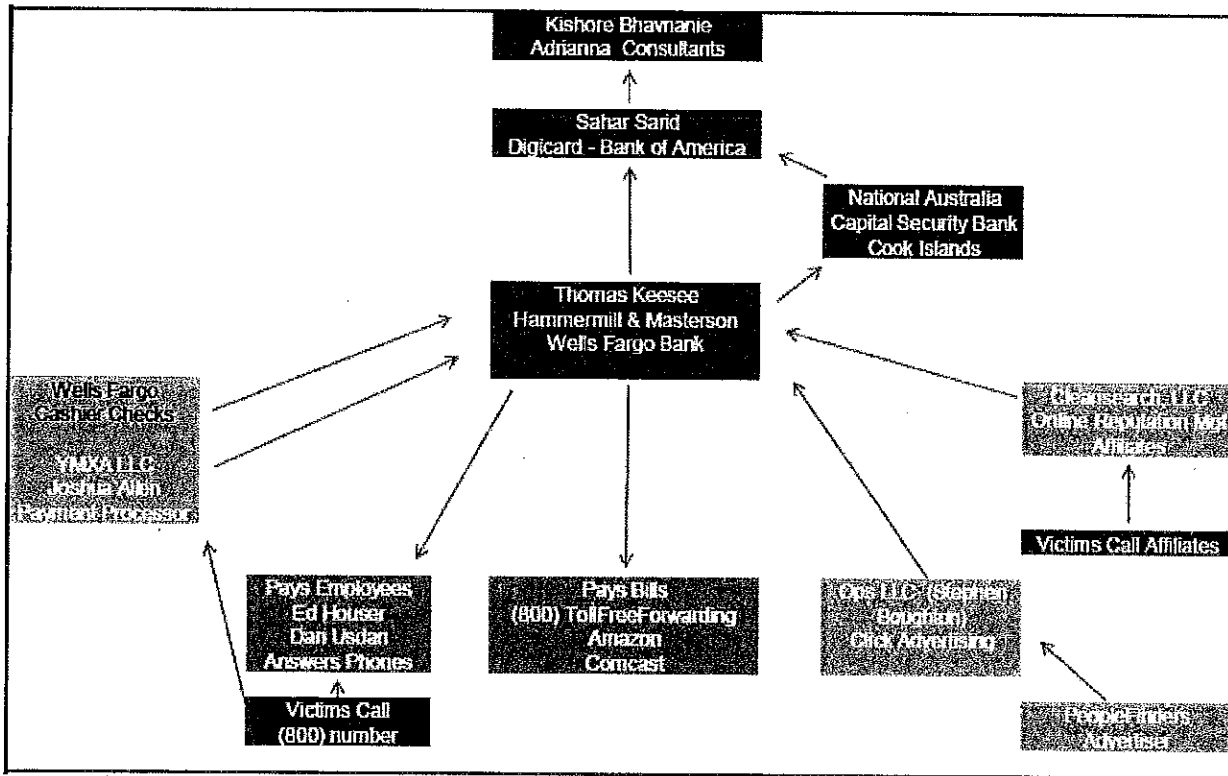
E-mail records for Unpublisharrest@yahoo.com obtained by search warrant revealed several transaction receipts from support@payscout.com documenting credit card transactions processed by YMXA. Based on these records, 58 victims were initially identified as having conducted credit card transactions with YMXA to remove their booking photos from Mugshots.com.

On August 15, 2017 the Judge Sharon Luceras of the Sacramento County Superior Court, authorized search warrants for Wells Fargo Bank, Payscout Partners, Inc., and Google, Inc.

On January 24, 2018, Payscout Partners, Inc. provided transaction records for payments processed through "YMXA" accounts for the removal of Mugshots.com postings. The records revealed the following between the dates of January 15, 2014 and January 26, 2017:

YMXA processed the payments of approximately 175 individuals, with billing addresses in the State of California, totaling approximately \$64,737, for the removal of Mugshots.com postings. In total, between the dates of January 15, 2014 and January 26, 2017, YMXA processed the payments of approximately 5,703 individuals, totaling approximately \$2,422,924, for the removal of booking photos on the Mugshots.com website.

Based on information received as a result of the search warrants, Mugshots.com is believed to be operating as displayed below in Diagram 1:



The Hammermill & Masterson account receives money from click advertising through companies such as 360 Ops LLC, which is associated with Stephen (Bart) Boughton. Click advertising is an internet advertising model used to direct traffic to websites, in which an advertiser pays a publisher when the ad is clicked. Rather than sending funds directly from the business account, Stephen Boughton has personally wired \$498,138 into the Hammermill & Masterson account. The wiring of funds through personal wires rather than between business accounts is indicative of money laundering.

The Hammermill & Masterson account also receives payments from affiliates such as Cleansearch.org, who charge consumers to remove various forms of negative information posted on the internet. Cleansearch.org transfers funds to Hammermill & Masterson using cashier's checks, also indicative of money laundering.

The Hammermill & Masterson account transfers funds to DigiCard LLC, and to NTI DigiCard, both Bank of America accounts. Bank records for these accounts reveal the account owners are Sahar SARID, SARID's mother, Aliza SARID, and SARID's sister, Shunit Sarid. These records confirmed the money originated from the Hammermill & Masterson account.

The records reviewed from the Hammermill & Masterson account show wires in excess of \$954,175 were sent to the National Australia Capital Security Bank, which is located in the Cook Islands. The records reviewed from the DigiCard LLC account show wires in excess of \$833,368 were received from the National Australia Capital Security Bank, which is located in the Cook Islands. Email records reveal that when a wire was sent from the Hammermill & Masterson account, KEESEE would also send an E-MAIL to SARID informing him of the wire amount. This indicates payments are being made to SARID by KEESEE from the profits derived from Mugshots.com operations.

DigiCard account records show outgoing transfers to Kishore BHAVNANIE, or to BHAVNANIE's entity, Adrianna Consultants. From an e-mail communication on November 14, 2016, from one of BHAVNANIE's e-mail accounts, BHAVNANIE identified himself as "Kishore (Jeff) BHAVNANIE, the tech guy for DigiCard." This indicates payments are being made to BHAVNANIE from KEESEE via SARID from the profits derived from Mugshots.com operations.

CONCLUSION

Mugshots.com constitutes a business permeated with fraud. A physical business address cannot be located, there is no Board of Directors, and the entities used to transfer the profits between the owners, Hammermill & Masterson LLC (Thomas KEESEE), DigiCard LLC (Sahar SARID), and Adriana Consultants LLC (Kishore BHAVNANIE) appear to have no obvious relation to and are not listed on the Mugshots.com website. As of May 2, 2018, the website purports that it is "Owned and Operated by: JULKISUUDESSA, Nevis, West Indies" yet Attorney Scott Ciolek was unable to serve JULKISUUDESSA in the West Indies during a class action lawsuit he filed in 2012. Additionally, none of the bank records produced pursuant to search warrants indicates profits being routed to the West Indies, nor do any email records indicate any daily operations conducted in West Indies.

Thomas KEESEE, who runs the operations of Mugshots.com via email and voice over internet phones (VOIP), utilizes an alias of "Chase Johnson" and he requires his employees to use aliases as well. He pays his employees in cash. The above-listed facts show a concerted effort to conceal involvement in felonious criminal activity and protect criminal proceeds generated via MUGSHOTS.COM by KEESEE,

SARID, BHAVNANIE, and their employee David USDAN, and to avoid criminal prosecution and civil liability.

Because the Mugshots.com website is online and operational as of May 2, 2018, I have probable cause to believe that the website continues to yield a profit for SARID, BHAVNANIE and KEESEE, and that USDAN is paid from that profit for his role in the operation of the business.

Based on the above-listed facts, as well as my training and experience, and the evidence set forth in this affidavit, I have probable cause to believe that Sahar SARID, Thomas KEESEE, Kishore BHAVNANIE, and David USDAN are in violation of conspiracy to commit extortion, use of personal identifying information for unlawful purposes and money laundering to conceal their profits.

The relevant identifying information for the listed victims is contained in the Confidential Attachment. Declarant requests that the "Confidential Attachment" be ordered sealed pursuant to California Rules of Court 243.1(d) in order to protect the confidential personal information of the individuals.

I, Inspector [REDACTED], hereby request a Warrant of Arrest be issued for the arrest of SAHAR SARID, good cause being shown therefore, for the crimes of California Penal Code section 182 – Conspiracy to Commit a Felony; Penal Code section 520 – Extortion; California Penal Code section 524—Attempted Extortion;; California Penal Code section 530.5(a)—Identity Theft; and California Penal Code section 186.10(a)—Money Laundering.

Sahar Sarid is described as a male, Caucasian, 5-7, 160 lbs., brown hair, brown eyes, Florida Drivers License [REDACTED] last known address: [REDACTED]

This declaration references and incorporates the felony complaint, reports and documents attached.



LAW ENFORCEMENT:

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 5-8-2018

S-DL

JUDICIAL OFFICER:

Approved Disapproved

Bail: 1,860,000 Date: 5-10-18

Alison M. Estrada

Signature Alison M. Estrada

I, Inspector [REDACTED], hereby request a Warrant of Arrest be issued for the arrest of KISHORE BHAVNANIE, good cause being shown therefore, for the crimes of California Penal Code section 182 – Conspiracy to Commit a Felony; Penal Code section 520 – Extortion; California Penal Code section 524—Attempted Extortion,; California Penal Code section 530.5(a)—Identity Theft; and California Penal Code section 186.10(a)—Money Laundering.

Kishore Vidya Bhavnanie described as a male, Caucasian, 5-5, 190 lbs., black hair, brown eyes, Pennsylvania Drivers License [REDACTED], last known address: [REDACTED]

This declaration references and incorporates the felony complaint, reports and documents attached.



LAW ENFORCEMENT:

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 5-8-2018

S-DL

JUDICIAL OFFICER:

X Approved ___ Disapproved

Bail: 1,860,000 Date: 5/10/18

Alison M. Estrada

Signature **Alison M. Estrada**

I, Inspector [REDACTED], hereby request a Warrant of Arrest be issued for the arrest of THOMAS KEESEE, good cause being shown therefore, for the crimes of California Penal Code section 182 – Conspiracy to Commit a Felony; Penal Code section 520 – Extortion; California Penal Code section 524—Attempted Extortion; California Penal Code section 530.5(a)—Identity Theft; and California Penal Code section 186.10(a)—Money Laundering.

Thomas Herbert Keesee is described as a male, Caucasian, 6-0, 170 lbs., blond hair, green eyes, Florida Drivers license [REDACTED], last known address: [REDACTED]



This declaration references and incorporates the felony complaint, reports and documents attached.

LAW ENFORCEMENT:

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 5-8-2018

DL

JUDICIAL OFFICER:

Approved Disapproved

Bail: 1,860,000 Date: 5-10-18

Alison M. Estrada

Signature Alison M. Estrada

I, Inspector [REDACTED], hereby request a Warrant of Arrest be issued for the arrest of DAVID USDAN, good cause being shown therefore, for the crimes of California Penal Code section 182 –Conspiracy to Commit a Felony; Penal Code section 520 – Extortion; California Penal Code section 524—Attempted Extortion,; and California Penal Code section 530.5(a)—Identity Theft.

David M. Usdan is described as a male, Caucasian, CT drivers license # [REDACTED] last known address:
[REDACTED]

This declaration references and incorporates the felony complaint, reports and documents attached.



THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED IS A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE AND OF RECORD IN MY OFFICE. SHEPHERD R. CARTER, EXECUTIVE OFFICER/CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES.

Attested: 5/10/18

BY [Signature] DEPUTY
Rafael Reyes



LAW ENFORCEMENT:

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 5-8-2018

[Signature]

JUDICIAL OFFICER:

Approved Disapproved

Bail: \$150,000 Date: _____

[Signature]

Signature Alison M. Estrada