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F.#2017R01392

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
CERTAIN URLS THAT IS STORED AT
PREMISES CONTROLLED BY GOOGLE,
INC.

**APPLICATION FOR A
SEARCH WARRANT FOR
INFORMATION IN
POSSESSION OF A PROVIDER**

Case No. **18 W 1048**

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, LAWRENCE SCHMUTZ, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with the YouTube and Google Inc. (“Google”) uniform resource locators (“URLs”) further described in attachment A that is stored at premises controlled by Google, a service provider headquartered at 1600 Amphitheater Parkway, Mountain View, CA 94043. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I

of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Joint Terrorism Task Force (“JTTF”). I have been an agent for approximately nine years. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical and electronic surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information regarding a variety of crimes. I am familiar with the facts and circumstances set forth below from my personal review of records, documents and other physical evidence obtained during this investigation, and from communications and information provided to me by fellow agents and other government personnel with knowledge related to this investigation.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 842(a)(3)(A) (transportation of explosive materials) and 18 U.S.C. § 2332a(a)(2) (use of a weapon of mass destruction) have been committed by Victor Kingsley. Indeed, a grand jury in the Eastern District of New York has returned an indictment charging Kingsley with these crimes. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband or fruits of these crimes further described in Attachments B.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

6. On or about July 28, 2017 at approximately 4:15 p.m., the owner of the residence at 145-23 222nd Street, Jamaica, New York (the “222nd Street address”) was outside the residence and opened a cylinder-shaped package inside of a plastic bag that he found by the mailbox of the residence. Upon opening, the package exploded. The destructive device (the “July 2017 device”) was a switch-activated device, which is triggered when an unwitting person attempts to open the package. The explosion resulted in extensive burns to the owner, who was then taken to the hospital. On August 1, 2017, the owner died as a result of his injuries.

7. After the explosion, agents recovered the remains of the package. The address label was still visible. The package was addressed to an individual who, at the time, was a New York City Police Department (“NYPD”) officer (hereinafter referred to as “Police Officer 1”) at “14523 222nd St Jamaica, NY Springfield Gardens, NY.” The sender was listed as an individual who is a retired NYPD Sergeant (hereinafter referred to as the “Sergeant”) at “2820 Snyder Ave, Brooklyn, NY 11226.” The return address listed is the address for the NYPD 67th Precinct in Brooklyn, New York. Police Officer 1 worked at the 67th Precinct from approximately 2014 to 2016. The Sergeant was previously assigned to

the 67th Precinct from approximately 2003 to 2015. The Sergeant retired in 2015 and was out of the country at the time of the explosion.

8. At the time of the explosion, Police Officer 1 did not live at the 222nd Street address. NYPD officers interviewed Police Officer 1, who stated that he has never lived at the 222nd Street address, and he does not know anyone who lives at the 222nd Street address. Even though Police Officer 1 has never lived at the 222nd Street address, there are multiple websites that link Police Officer 1 to the 222nd Street address. Whitepages.com provides multiple addresses for Police Officer 1's name in New York. One of the provided addresses is the address 145-23 222nd Street, Springfield Gardens, NY 11413. A review of whitepages.com on February 16, 2018 shows that it listed two entries for Police Officer 1's name residing in New York, one of which was the 222nd Street address.

9. Records obtained from whitepages.com showed fourteen searches for Police Officer 1's name between December 1, 2016 and July 31, 2017. Of those fourteen searches, nine of the searches occurred on or about December 8, 2016 and December 9, 2016. There were three Internet Protocol ("IP") addresses associated with these searches: 98.116.26.208, 98.116.21.86 and 98.116.26.48 (collectively, the "98 IP addresses"). Less than fifteen minutes after the final December 9, 2016 whitepages.com search from IP address 98.116.26.48 IP, the user of the same IP address logged into the Facebook page for "Vei King." The vanity name for the Facebook account is "The God Named King," and the registered email address for the account is "thegodnamedking@yahoo.com." Records obtained from Yahoo show that this email account is registered to Victor Kingsley at zip code 11203.

10. Records obtained from Verizon show that, at the time of the above searches, the 98 IP addresses were associated with the customer “Besorene Kingsley” located at 152 E 43rd Street, Brooklyn, New York 11203 (the “43rd Street address”). Records obtained from New York State show that Besorene Kingsley is the mother of Victor C. Kingsley. Records obtained from the New York Department of Motor Vehicles show that both Victor Kingsley and Besorene Kingsley reside at the 43rd Street address. In addition, postal money orders obtained from the Federal Reserve Bank dated August 17, 2017, December 20, 2017 and January 18, 2018, provide the 43rd Street address as Victor Kingsley’s address. The 43rd Street address is within the confines of NYPD 67th Precinct.

11. A review of NYPD records revealed that on January 5, 2014, Victor Kingsley was arrested in the vicinity of Linden Boulevard and East 43rd Street in Brooklyn, New York, which is the intersection located approximately 400 feet north of the 43rd Street address. Victor Kingsley was arrested for criminal possession of a weapon, obstruction of governmental administration, disorderly conduct and resisting arrest. The arrest records indicate that the arresting officer was an officer assigned to the 67th precinct (hereinafter referred to as “Police Officer 2”), and the supervising officer for the arrest was the Sergeant, the same individual listed as the sender of the July 2017 device. In addition to Police Officer 2, three other police officers from the 67th Precinct were involved in the arrest of Kingsley and were present at the scene of his arrest. Ultimately, all charges against Kingsley were dismissed.

12. As set forth above, the Sergeant was assigned to the 67th Precinct from September 4, 2003 until his retirement, on or about July 21, 2015. Police Officer 1 was a

police officer assigned to the 67th Precinct from May 16, 2014 to December 7, 2016. Prior to the Sergeant's retirement, Police Officer 1 was assigned to the Conditions Unit, and the Sergeant was his supervisor. The Conditions Unit is generally responsible for focusing on the criminal activity that is the most significant issue within the precinct. The Conditions Unit partners with other NYPD groups within the precinct, such as the Anticrime Unit or the Warrant Squad. Based on my training and experience, conversations with other law enforcement officers and involvement in the investigation, I know that officers assigned to the Conditions Unit, as part of their duties and responsibilities, patrol the neighborhood, interact with individuals within the precinct and execute arrests based on probable cause. After leaving the Conditions Unit, Police Officer 1 became a member of the Strategic Enforcement Team ("SET") within the 67th Precinct. Police Officer 2 and the three other police officers involved in Kingsley's arrest were also members of the SET team when Police Officer 1 joined.

13. The July 2017 device was a switch-activated device. The device consisted of, among other things, a 9-volt Energizer battery, a battery case holder, an initiator and a clothespin with screws in it. The device was contained in a mailing tube that was approximately five inches in diameter and twelve inches long. According to a NYPD laboratory report, the device contained a mix of potassium chlorate and aluminum metal. Based on my training and experience and conversations with bomb technician experts, I have learned that potassium chlorate and aluminum metal, when mixed together, create an incendiary flash powder that can be used for destructive devices.

14. According to records obtained from Amazon, prior to the explosion, on or about February 2, 2017, Victor Kingsley placed an order for “5lb Eckart German Blackhead 5413 H Super Aluminum Powder 3 Micron.” The substance ordered is consistent with the aluminum metal powder that was found in the July 2017 device. On or about April 22, 2017, Victor Kingsley placed an order on Amazon for a “BILUSOCN Profession 12cue 433MHZ Wireless remote control Fireworks firing system.” A review of this product on Amazon shows that it contains initiators that are consistent with the kind used in the July 2017 device. On or about May 3, 2017, Victor Kingsley placed an order on Amazon for a “Tape Logic TLP5026KHD Jumbo Mailing Tubes, 5”x26”, Kraft (Pack of 15).” The mailing tubes are the same color and diameter of the mailing tube used for the July 2017 device. Although the tube ordered is longer than the one used in the July 2017 device, the tube ordered is capable of being cut to a length of 12 inches. On or about July 3, 2017, Victor Kingsley placed an order on Amazon for an “Actopus 6PCS 9V Battery Box Pack Holder With ON/OFF Power Switch Toggle.” The battery pack holder is consistent with the battery pack holder used in the July 2017 device.

15. Amazon records further show that, on or about September 12, 2017, after the July explosion, Victor Kingsley placed another order on Amazon for “5lb Eckart German Blackhead 5413 H Super Aluminum Powder 3 Micron.” On or about February 7, 2018, Victor Kingsley placed an order on Amazon for “4 Pcs 9V Battery Case Holder with Cover Storage Case Holder with ON/OFF Switch for 6F22.”

16. In addition, records obtained from Alpha Chemicals show that on or about April 29, 2011, Victor Kingsley placed an order for ten pounds of aluminum powder

and thirty pounds of red iron oxide. Based on my training and experience, I know that red iron oxide and aluminum powder can be combined to create thermite, an incendiary material. Records obtained from Thunder Valley show that on or about February 7, 2017, Victor Kingsley placed an order for fifteen pounds of potassium perchlorate. As discussed above, the explosive material contained in the July 2017 device was a mix of potassium perchlorate and aluminum metal. On or about September 20, 2017, after the explosion, Victor Kingsley placed another order from Thunder Valley. Kingsley ordered ten pounds of potassium perchlorate.

17. On or about February 27, 2018, the Honorable Vera M. Scanlon, United States Magistrate Judge, issued a warrant for the arrest of Victor Kingsley for using a weapon of mass destruction resulting in death, in violation of 18 U.S.C. § 2332a, and the unlawful transportation of explosive devices, in violation of 18 U.S.C. § 842(a)(3). On February 28, 2018, agents arrested Victor Kingsley at his residence, the 43rd Street address in Brooklyn. Agents then conducted a search of the residence pursuant to a search warrant. During the search, agents found, among other things, a torn up mailing label, which had the same recipient and sender as the package containing the July 2017 device. Agents also found a number of fully assembled and partially assembled devices, including one device that appeared upon initial inspection to be almost identical to the July 2017 device. The listed recipient was Police Officer 2's wife, using her maiden name, and the sender was "Kohl's Department Stores." An open source search shows that Kohl's is listed as the registry for Police Officer 2 and his now-wife's wedding. Agents found approximately forty pounds of powder that, based on its physical appearance and initial field testing, is believed to be a low-

explosive pyrotechnic, which is commonly referred to as flash powder. Agents also found approximately twenty pounds of what is believed, based on its physical appearance and initial field testing, to be thermite, which is a mixture of iron oxide and aluminum and is an incendiary material.

18. Additionally, two computers were seized from Victor Kingsley's bedroom during the search of the residence. A forensic analysis of these computers revealed that an individual accessing the computers frequently viewed online videos through both YouTube and Google. Among searches conducted and/or videos viewed included the following:

- “Wireless Ignitor”
- “Wireless Remote Controlled Fireworks Ignitor”
- “Ultimate DIY cellphone Detonator”
- “cellphone ignitor”
- “lighting thermite remotely”
- “50 lbs of black powder”

The URLs listed in Attachment A were all found on the computers described above, which were seized from Kingsley's bedroom. The URLs contain phrases that could provide evidence regarding Kingsley's construction of the explosive devices. For example, two of the URLs appear to contain the phrases “self+hardening +steel” and “20hardening%20liquid%20metal.” Based on my training and experience, I believe that the content of the videos shows that Kingsley was researching properties of elements that could be utilized in explosive devices.

19. Based on my training and experience and the investigation to date, I believe the content of the requested URLs will contain information that constitutes fruits, contraband, evidence and instrumentalities of violations of 18 U.S.C. § 842(a)(3)(A) (transportation of explosive materials) and 18 U.S.C. § 2332a(a)(2) (use of a weapon of mass destruction).

BACKGROUND CONCERNING YOUTUBE AND GOOGLE

20. In my training and experience, I have learned that Google provides a variety of on-line services to the public. These services include YouTube, an Internet forum that allows users to share, search for, view and comment on video content. From my review of publicly available information provided by Google about YouTube, including Google's "Privacy Policy," in addition to my training and experience, I am aware of the following about YouTube and about the information collected and retained by Google in connection with that service.

21. Users can access YouTube through the YouTube website or by using a special electronic application ("app") that allows users to access the service through a mobile device.

22. Anyone can watch videos on YouTube. However, a Google account is necessary to take advantage of YouTube's customizable features. For example, a Google account enables users to "like" videos, save their favorite videos, subscribe to video channels, save videos to watch later, maintain a history of videos they've watched, and flag videos. YouTube can also personalize video recommendations based on a user's video preferences and subscriptions. All of this information is maintained by YouTube in a user's private profile.

23. A Google account is a single account that permits access to all of Google's services, including YouTube. Subscribers obtain a Google account by registering with Google. During the registration process, Google asks subscribers to provide basic personal information. Such information can include the subscriber's full name, physical address, telephone or SMS numbers and other identifiers, alternative or recovery email addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number). In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users. Based on my training and experience, even if subscribers insert false information to conceal their identity, I know that this information often provide clues to their identity, location or illicit activities.

24. In order to upload or comment on a video, Google requires users to create a YouTube "channel." In other words, without a channel, users have no public presence on YouTube. Although Google accounts do not come with a YouTube channel by default, users with a Google account can choose to create one. To do so, Google requires the user to input the name of the channel, identify a channel category, and agree to the terms of use. When a user uploads a video, Google asks for a variety of information, including a category, title, description, "tag" (for keyword searches), and location. Therefore, for every video that is posted on YouTube, Google maintains account information and associated records about the user that posted the video, in addition to the video itself.

25. A video uploaded to YouTube is public by default. This means that anyone can view the video by visiting YouTube. However, a user can also change the privacy settings to permit only certain users to view a video. A user can do this by "linking" their

YouTube account with Google+, a social networking service provided by Google. The user can then select the email addresses or profiles of other Google+ users with whom the video will be shared. A user can also make a video “unlisted,” which means that only those with a link to the video can view it. Unlisted videos are not visible to others who visit the channel page and generally do not show up in YouTube’s search results.

26. As part of its business model, Google also collects a variety of data on YouTube videos. This includes information for each time a video was watched; the comments and shares of a video; the demographics of viewers; and the sources of traffic to the videos (i.e., the source webpages and links that a viewer used to land on the video).

27. Further, Google typically retains certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via Google’s website), and other log files that reflect usage of the account. In addition, Google often has records of the Internet Protocol address (“IP address”) used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the account.

28. In addition, Google collects device-specific information (such as a user’s hardware model, operating system version, unique device identifiers, and mobile network information including phone number), which it may associate with a user’s Google account. Google states that it may also collect and process information about a user’s location, based on

information including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points and cell towers.

29. In my training and experience, in some cases, account users will communicate directly with a service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. Google typically retains records about such communications, including records of contacts between the user and Google's support services, as well records of any actions taken by Google or a user as a result of the communications. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

30. As explained herein, information stored in connection with a YouTube video and Google account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, the information stored in connection with an account can indicate who has used or controlled the account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, communications, contact lists, and content uploaded or shared (and the data associated with the foregoing, such as date and time) may indicate who used or controlled the account at a relevant time.

31. Further, information maintained by the provider can show how and when the account was accessed or used. For example, providers typically log the Internet Protocol (IP) addresses from which users access the account along with the time and date. By determining the

physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. This geographic and timeline information may tend to either inculcate or exculpate the account owner. Additionally, information stored at the user's account may further indicate the geographic location of the account user at a particular time (e.g., location information integrated into an image or video). Last, stored electronic data may provide relevant insight into the account owner's state of mind as it relates to the offense under investigation. For example, information in the account may indicate the owner's motive and intent to commit a crime (e.g., communications relating to the crime), or consciousness of guilt (e.g., deleting communications in an effort to conceal them from law enforcement).

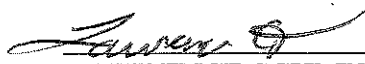
32. Therefore, the computers of Google are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of YouTube, such as account access information, transaction information, and other account information.

CONCLUSION

33. Based on the forgoing, I request that the Court issue the proposed search warrant. Because the warrant will be served on Google who will then compile the

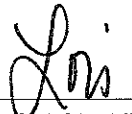
requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,



LAWRENCE SCHMUTZ
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on 11/1, 2018

 s/Lois Bloom
HONORAE
UNITED STATES
EASTERN DISTRICT OF
NEW YORK

GE

ATTACHMENT A

Property To Be Searched

This warrant applies to information associated with the following URLs that is stored at premises controlled by Google, a company that is headquartered in Mountain View, CA.

<http://www.youtube.com/watch?v=%s>

<https://www.youtube.com/yts/jsbin/www-pagead-id-vfl54-Mnx/www-pagead-id.js>

<https://www.youtube.com/watch?v=7XSH0buX1DU>

[http://www.youtube.com/channel/uc-9-kytw8zkzndhj6fgpwq\[tab\]11](http://www.youtube.com/channel/uc-9-kytw8zkzndhj6fgpwq[tab]11)

https://www.youtube.com/yts/jsbin/www-en_US-vfl9sx-7V/results.js

<https://www.youtube.com/watch?v=mAMxEARy9d4>

<https://www.youtube.com/watch?v=J3eRROPvxxI>

<https://www.youtube.com/watch?v=Zfk6zJkAU-k>

<https://www.youtube.com/watch?v=fFTsroJ3yvI>

<https://www.youtube.com/watch?v=qgeFbw3WrTE>

<https://www.youtube.com/watch?v=9LjEcp-MCBE>

<https://www.youtube.com/watch?v=8fKcK8F1gVs>

<https://www.youtube.com/watch?v=NIvOvU1XbIE>

<https://www.youtube.com/watch?v=WDm2Js6co8U>

<https://www.youtube.com/watch?v=QaisiD9ekCQ>

<https://www.youtube.com/watch?v=x4Fw2MB6Pac>

<https://www.youtube.com/watch?v=g1-SEJUc8uM>

https://www.youtube.com/api/stats/playback?ns=yt&el=detailpage&cpn=tASWFBjFdykCvzt&docid=nflpbsTV_3Y&ver=2&referrer=https%3A%2F%2Fwww.youtube.com%2Fresults%3Fsearch_query%3Dsms%2Bpro%2Bsetup&cmt=0.01&plid=AAVmQ-nxqjJQsmjE&ei=NJCWWqzjNMiuhwbqJaYDg&fmt=244&fs=0&rt=1.004&of=GC6OCn1ITVgpgJyrp2hYjw&euri&lact=1062&cl=187164786&mos=0&vm=CAEQABgE&volume=12&c=WEB&cver=1.20180227&cplayer=UNIPLAYER&cbr=Chrome&cbrver=64.0.3282.186&cos=Windows&cosver=10.0&hl=en_US&cr=US&len=1350.721&fexp=23708904%2C2370890

https://www.youtube.com/api/stats/playback?ns=yt&el=detailpage&cpn=FWF4uOGWPYEp1YX6&docid=nflpbsTV_3Y&ver=2&referrer=https%3A%2F%2Fwww.youtube.com%2Fresults%3Fsearch_query%3Dsms%2Bpro%2Bsetup&cmt=0.02&plid=AAVmQ-nxqjJQsmjE&ei=NJCWWqzjNMiuhwbqJaYDg&fmt=244&fs=0&rt=0.88&of=GC6OCn1ITVgpgJyrp2hYjw&euri&lact=894&cl=187164786&mos=0&vm=CAEQABgE&volume=12&c=WEB&cver=1.20180227&cplayer=UNIPLAYER&cbr=Chrome&cbrver=64.0.3282.186&cos=Windows&cosver=10.0&hl=en_US&cr=US&len=1350.721&fexp=23708904%2C23708906

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<http://www.youtube.com/watch?v=3kuPkc7D35U>

<http://www.youtube.com/watch?v=IuJJRd1hMow>

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<http://www.youtube.com/watch?v=IuJJRd1hMow>

http://www.google.com/search?client=firefox-a&rls=org.mozilla%3Aen-US%3Aofficial&channel=s&hl=en&source=hp&biw=1280&bih=541&q=youtube&btnG=Google+Search#pq=pure+lye&hl=en&sugexp=ppwl&cp=5&gs_id=2u&xhr=t&q=puresteel+paladin&pf=p&sclient=psy-ab&safe=off&client=firefox-a&rls=org.mozilla:en-US%3Aofficial&channel=s&source=hp&pbx=1&oq=pures&aq=0&aqi=g4&aql=&gs_sm=&gs_upl=&bav=on.2,or.r_gc.r_pw.,cf.osb&fp=b5182ba715b1e6af&biw=1280&bih=541

http://www.google.com/search?client=firefox-a&rls=org.mozilla%3Aen-US%3Aofficial&channel=s&hl=en&source=hp&biw=1280&bih=541&q=youtube&btnG=Google+Search#sclient=psy-ab&hl=en&safe=off&client=firefox-a&rls=org.mozilla:en-US%3Aofficial&channel=s&biw=1280&bih=541&source=hp&q=pure%20sodium%20hydroxid e&pbx=1&oq=&aq=&aqi=&aql=&gs_sm=&gs_upl=&bav=on.2,or.r_gc.r_pw.,cf.osb&fp=b5182ba715b1e6af&pf=p&pdl=500

<http://www.youtube.com/watch?v=KBRMap3ZIuk>

ATTACHMENT B

Particular Things To Be Seized

I. Information to be disclosed by Google (the “Provider”)

To the extent that videos or information described in Attachment A is within the possession, custody, or control of the Provider, including any videos or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following information to the government, for each URL listed in Attachment A; the content associated with each URL.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of 18 U.S.C. § 842(a)(3)(A) (transportation of explosive materials) and 18 U.S.C. § 2332a(a)(2) (use of a weapon of mass destruction), those violations involving Victor Kingsley occurring after April 1, 2011, including, for the URLs listed on Attachment A, information pertaining to the following matters:

- (a) Evidence related to any orders, purchases, inquiries or research related to chemicals, explosive materials or other components utilized to create an explosive device, explosive materials or any other weapon;
- (b) Evidence related to explosive materials, devices or any other weapons, including any manuals, instructions or videos concerning how to create explosive materials;
- (c) Evidence related to Police Officers 1 and 2, the Sergeant, the officers involved in Kingsley's 2014 arrest, their family members, any other individuals involved in Kingsley's criminal case, the 67th Precinct or any other police officers, including but not limited to any attempts to gain personal information related to any of these individuals;
- (d) Evidence related to whitepages.com or any other evidence related to obtaining address or other personal information, including information for Police Officers 1 and 2, the Sergeant, the officers involved in Kingsley's 2014 arrest, their family members, any other individuals involved in Kingsley's criminal case or any other police officers;

- (e) Evidence related to any preparatory steps taken in furtherance of the scheme to use a destructive device or other type of weapon of mass destruction;
- (f) Evidence related to the selection of targets or obtaining information related to those targets in furtherance of the scheme;

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
BUSINESS RECORDS PURSUANT TO FEDERAL RULE
OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Google, and my official title is _____. I am a custodian of records for Google. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Google, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Google; and
- c. such records were made by Google as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature