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STATE OF MINNESOTA, COUNTY OF HENNEPIN

DISTRICT COURT

**APPLICATION FOR SEARCH WARRANT**

I, Carter Staaf, a licensed peace officer in the State of Minnesota, make an application to this Court for a warrant to search the premises described below, for the property and thing(s) described below.

I know the content of this application and affirm that the statements contained in this application are true based on my own knowledge, or are believed to be true.

I believe that the following described property and thing(s), namely:

**This warrant is directed to Google LLC, headquartered at 1600 Amphitheatre Parkway, Mountain View, California, and applies to (1) GPS, WiFi, Bluetooth or cellular sourced location history data generated from devices that reported a location within the geographical region bounded by the following latitudinal and longitudinal coordinates, dates, and times (“Initial Search Parameters”) and (2) if requested at a later time identifying information for Google Accounts associated with the responsive location history data:**

**Google shall query location history data based on the Initial Search Parameters.**

**For each location point recorded within the Initial Search Parameters, Google shall produce anonymized information specifying the corresponding unique device ID, timestamp, coordinates, display radius, and data source, if available (the “Anonymized List”).**

**Law enforcement shall review the Anonymized List to remove devices that are not relevant to the investigation, for example, devices that were not in the location for a sufficient period of time. If additional location information for a given device ID is needed in order to determine whether that device is relevant to the investigation, law enforcement may request that Google provide additional location coordinates for the Time Period that fall outside of the Target Location. These contextual location coordinates may assist law enforcement in identifying devices that were located outside the Target Location, were not within the Target Location for a long enough period of time, were moving through the Target Location in a manner inconsistent with the facts of the underlying case, or otherwise are not relevant to the investigation.**

**For those device IDs identified as relevant pursuant to the process described above, law enforcement may request that Google Provide identifying information, as defined in 18**

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U.S.C. § 2703(c)(2), for the Google Account associated with each identified device ID.

**Search Parameters**

**Target Location #1 date and time: 01/20/2018 2130hrs - 2300 hrs (Central time)**

**Target Location #1:**

**Geographical area identified as a polygon defined by the following latitude/longitude coordinates and connected by straight lines:**

**Point #1 44.863174° -93.458614°**

**Point #2 44.863206° -93.457757°**

**Point #3 44.862726° -93.457739°**

**Point #4 44.862720° -93.458631°**

is or are at the premises described as:

**1600 Google Amphitheatre parkway, Mountain View, California**

This search is of records held by an out-of-state corporation, Google LLC, doing business in city or township of Eden Prairie, County of Hennepin, State of Minnesota.

I apply for a search warrant on the following grounds:

- The property or things above-described constitutes evidence which tends to show a crime has been committed, or tends to show that a particular person has committed a crime.

The facts establishing the grounds for issuance of a search warrant are as follows:

Your affiant, Carter Staaf, is a Police Detective employed by the Eden Prairie Police Department and is authorized to make application for this search warrant. Your affiant has been employed as a Police Officer in the State of Minnesota for 22 years and currently holds a Police Officer License issued by the Minnesota POST Board. Your affiant is currently assigned to the Criminal Investigative Division. Your affiant has experience with the preparation and execution of search warrants for a variety of crimes and has written, executed and assisted with the execution of search warrants in the past. Your affiant is familiar with the elements necessary to make reasonable searches and seizures.

During the course of his employment as a law enforcement officer, your affiant has conducted and participated in numerous criminal investigations including, but not limited to:

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Sex Trafficking, Criminal Sexual Conduct, Burglary, Armed Robbery, Homicide and other felony and misdemeanor crimes. Your affiant has been involved in numerous investigations that involve data recovered from mobile devices.

This affidavit is based on an investigation conducted by members of the Eden Prairie Police Department your affiant's knowledge of the matters contained in this affidavit is based upon his personal knowledge and information provided by other law enforcement officers/agents. An unknown adult male is currently under investigation for Aggravated Robbery.

On 01-20-2019 at approximately 2235 hours Eden Prairie Police Dispatch received a 9-1-1 call from (J.G.) who reported he had been robbed at gunpoint at Buca Restaurant, 7711 Mitchell Road, Eden Prairie, Hennepin County, Minnesota.

Eden Prairie Police Officers responded to Buca and learned that at approximately 2200 hours the manager (J.G.) went to the second level office of the restaurant to conduct closing business. The restaurant had closed at 2100 hours and some late customers had left. All other employees had left with the exception of two who were cleaning in the seating area. The doors had been locked with the exception to a door that lead to the dumpster which had been propped open.

While (J.G.) was in the office he had the door closed and locked as part of routine. He counted money and reconciled receipts for the evening. When he was finished he placed the money into the safe, unlocked the door and began to walk out of the office.

Immediately upon opening the office door (J.G.) was met by a masked gunman. The suspect displayed a small frame pistol and told (J.G.) to get back into the office. (J.G.) told officers that once in the office the suspect instructed him to open the safe. (J.G.) was told that if he complied he would not be hurt.

(J.G.) opened the safe for the suspect. The suspect told (J.G.) to lean over a chair in the office. The suspect applied restraints to (J.G.'S.) hands and covered his eyes. The suspect took a large amount of cash out of the safe while (J.G.) was tied up. The suspect then left office with (J.G.) still tied up.

(J.G.) was able to free himself from the restraints and called 9-1-1 from his cell phone. (J.G.) looked out a window to the parking lot and saw what he believed to be a smaller style SUV leave the parking lot out onto Martin Drive.

During the course of the investigation, officers learned that neither employee cleaning in the restaurant were aware that (J.G.) had been robbed in the office. The suspect had a neoprene ski mask and hooded sweatshirt the covered his face and head. The suspects clothing was baggy and dark.

Offices discovered footprints in the fresh snow that lead from an office roof access door

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across the roof to the south. The footprints ended at the edge of the roof near a tree that was very close to the building. There were broken branches in the tree and a set of fresh tire tracks in the snow leading away from the building.

Officers searched the building and surrounding area. They located a neoprene ski mask and gloves discarded into a marsh area east of Martin Drive. Your affiant reviewed video from a neighboring apartment complex. At approximately 2227 hours the video showed what appeared to be a newer model sedan travel Martin Drive. The vehicle did not have its lights as it drove away. Near the area where the ski mask was recovered the vehicle's brake lights came on and it speed depleted briefly. The vehicle then turned its lights on and left towards Mitchell Road.

Your affiant met with Buca Management and learned that they found two suspicious items in the chef's office. According to the chef there was a pair of sunglasses and bolt cutters left in his office. There were no employees that would have reason to enter the chef's office.

Your affiant knows from previous experience and training that often times a suspect would hide or stowaway in a building in order to commit a crime later. The chef's office was directly between the manager's office and the roof access door. Your affiant believed that if a suspect were to stowaway they might access their mobile device either to communicate with an accomplice or pass time while waiting. There are no identified suspects in this case.

Based on your affiant's training and experience, he has learned that Google collects and retains location data to provide location based services such as advertising and searches. This location data is derived from cellular phones, tablets, and other computers. The data being provided by the issuance of this warrant is anonymized and is referred to as a Google Device ID. Each device that provides information to Google is assigned an anonymous Google Device ID by Google. The information requested with this warrant is similar that that of a "tower dump" from a cell phone provider but is more restrictive in the sense that it is anonymous. Google is only providing "Device ID" information. There is no way for your affiant to identify the related user of the device with this information alone. Once the data has been received from Google, your affiant will process the data to identify any "Device Id(s)" that are related to the specific crime being investigated.

Your affiant will then review the Anonymized List of Device IDs returned from Google and will remove devices that are not relevant to the investigation. If additional location information for a given Device ID is needed in order to determine whether that device is relevant to the investigation, law enforcement may request subscriber information related to those Device IDs. The subscriber information returned by Google is typically a Google (gmail) account identifier.

Once your affiant has identified Device IDs that can be articulated as being related to the investigation additional warrants will be completed in order to obtain content, including

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additional location information, from those accounts.

For those Device IDs identified as relevant pursuant to the process described above, your affiant may request that Google Provide identifying information, as defined in 18 U.S.C. § 2703(c)(2), for the Google Account associated with each identified device ID.

This search warrant is made pursuant to: 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), 2703(c)(1)(A) and 2703(c)(2) and there is probable cause to believe that the described record or other information pertaining to the business transactions of Google, 1600 Amphitheatre Parkway Mountain View, CA 94043 is relevant to a legitimate law enforcement inquiry and evidence of the crime of criminal sexual conduct as defined in Minnesota State Statute.

**PROPERTY TO BE SEARCHED** – This warrant is directed to Google LLC, which is headquarter at 1600 Google Amphitheatre parkway, Mountain View, California, and applies to –

1. - GPS, WiFi or Bluetooth, and/or cell tower sourced location history data generated from devices that reported a location within the geographical region bounded by the following latitudinal and longitudinal coordinates, dates, and times listed below.
2. - For each location point recorded within the Initial Search Parameters, Google shall produce anonymized information specifying the corresponding unique device ID, timestamp, coordinates, display radius, and data source, if available (the “Anonymized List”).

*Target Location* Date and Time: 01/20/2019 between 2130 hours and 2300 hours Central Standard Time.

*Target Location:*

Geographical area identified as a polygon defined by the following latitude/longitude and connected by straight lines:

Point #1 44.863174° -93.458614°

Point #2 44.863206° -93.457757°

Point #3 44.862726° -93.457739°

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Point #4 44.862720° -93.458631°

**(End of Page)**

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I request a search warrant be issued, commanding Carter Staaf, Det. Peterson, peace officers of the State of Minnesota, and any other authorized person, to enter and search between the hours of 7 a.m. and 8 p.m. to search the above described premises for the described property and thing(s), and to seize and keep said property and thing(s) in custody until dealt with according to law.

**I declare under penalty of perjury that everything stated in this document is true and correct.**

**Applicant: Carter Staaf**

Eden Prairie Police Dept

Electronically Signed

01/28/2019 9:32 AM

Hennepin County, Minnesota

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STATE OF MINNESOTA, COUNTY OF HENNEPIN

DISTRICT COURT

**SEARCH WARRANT**

TO: CARTER STAAF, DET. PETERSON PEACE OFFICERS OF THE STATE OF MINNESOTA.

WHEREAS, Carter StAAF has this day on oath made an application to this Court for a warrant to search the following described premises :

**1600 Google Amphitheatre parkway, Mountain View, California**

This search is of records held by an out-of-state corporation, Google LLC, doing business in city or township of Eden Prairie, State of Minnesota for the following described property and thing(s):

**This warrant is directed to Google LLC, headquartered at 1600 Amphitheatre Parkway, Mountain View, California, and applies to (1) GPS, WiFi, Bluetooth or cellular sourced location history data generated from devices that reported a location within the geographical region bounded by the following latitudinal and longitudinal coordinates, dates, and times (“Initial Search Parameters”) and (2) if requested at a later time identifying information for Google Accounts associated with the responsive location history data:**

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**Search Parameters**

***Target Location #1*** date and time: 01/20/2018 2130hrs - 2300 hrs (Central time)

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**Point #4 44.862720° -93.458631°**

WHEREAS, the application of Carter Staaf was duly presented and read by the Court, and being fully advised in the premises.

NOW, THEREFORE, the Court finds that probable cause exists for the issuance of a search warrant upon the following ground(s):

- The property or things above-described constitutes evidence which tends to show a crime has been committed, or tends to show that a particular person has committed a crime.

The court further finds that probable cause exists to believe that the above-described property and thing(s) is or are at the above-described premises

**(End of Page)**

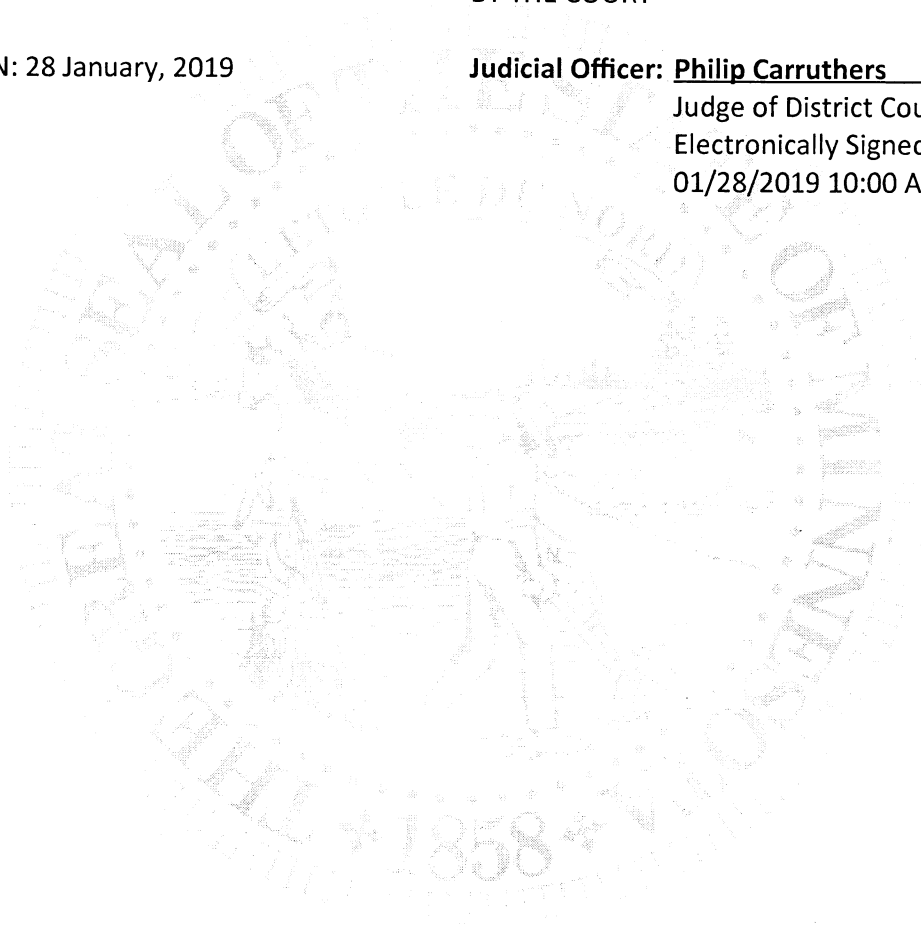
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NOW, THEREFORE, you Carter Staaf, Det. Peterson, peace officers of the State of Minnesota, and any other authorized person, are hereby commanded to enter and search between the hours of 7 a.m. and 8 p.m., to search the above-described premises, for the described property and thing(s), and to seize and keep said property and thing(s) in custody until dealt with according to law.

BY THE COURT

ISSUED ON: 28 January, 2019

**Judicial Officer: Philip Carruthers**  
Judge of District Court  
Electronically Signed  
01/28/2019 10:00 AM



STATE OF MINNESOTA, COUNTY OF Hennepin

DISTRICT COURT

**RECEIPT, INVENTORY AND RETURN**

I, Det. Carter Staaf, received the attached search warrant issued by the Honorable Phillip Carruthers, on 01/28/2019, and have executed it as follows:

Pursuant to the warrant, on 01/28/2019, at 10:30 o'clock am, I searched the following described in the search warrant.

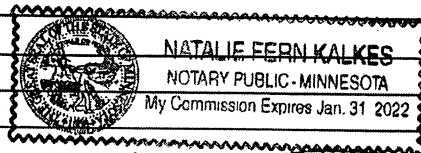
- Premises
- Motor Vehicle
- Person
- Device

I have left a true and correct copy of the search warrant (~~with~~ ~~in~~) (at)

Google LLC, 1600 Amphitheatre Parkway, Mountain View, California

I took into custody the property and things listed below: (attach and identify additional sheets if necessary)

Digital anonymized device location history to be returned at a latter date.



*Natalie Kalkes*

**Check the appropriate:**

- I left a receipt for the property and things listed above with a copy of the warrant.
- None of the items set forth in the search warrant was found.
- I shall retain or deliver custody of said property as directed by court order.

"I declare under penalty of perjury that everything I have stated in this document is true and correct." Minn. Stat. 358.116.

(Signature) \_\_\_\_\_ Date: 01/28/2019  
County: Hennepin State: MN

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