

**LAW ENFORCEMENT SENSITIVE**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal No.: 13-274 (RC)
	:	
v.	:	
	:	
SHANTIA HASSANSHAH,	:	<i>Ex Parte</i> Pursuant to Court Order
	:	Filed Under Seal
Defendant.	:	
	:	

**DECLARATION OF ROBERT PATTERSON**

1. I am an Assistant Special Agent in Charge at the United States Drug Enforcement Administration (“DEA”), which is a component of the Department of Justice. I have held this position for 8 years. Based on my current role within DEA, I am familiar with the database that is described below. This declaration is based on my personal knowledge and on information that has been provided to me in my official capacity.

2. I make this declaration in response to this Court’s December 1, 2014 Order directing the government to “provide the Court with an *ex parte* declaration summarizing the contours of the law enforcement database used by Homeland Security Investigations to discover Hassanshahi’s phone number, including any limitations on how and when the database may be used.” I understand that the phone number referenced in the Court’s Order as “Hassanshahi’s phone number” is 818-971-9512 (hereinafter, “the 818 number”).

3. As described in the previously filed, public affidavit of Joshua J. Akronowitz, Government investigators learned that there was reason to believe that Iranian telephone number 982144406457 (hereinafter, “the Iranian number”) was relevant to an ongoing federal criminal investigation. The Iranian number was queried in a federal law enforcement database [REDACTED] [REDACTED] the database indicated that a call had been placed from the 818 number to the Iranian number.

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4. This database [REDACTED] consisted of telecommunications metadata obtained from United States telecommunications service providers pursuant to administrative subpoenas served upon the service providers under the provisions of 21 U.S.C. § 876. This metadata related to international telephone calls originating in the United States and calling [REDACTED] designated foreign countries, one of which was Iran, that were determined to have a demonstrated nexus to international drug trafficking and related criminal activities. This metadata consisted exclusively of the initiating telephone number; the receiving telephone number; the date, time, and duration of the call; and the method by which the call was billed. No subscriber information or other personal identifying information was included in this database. No communication content was included in this database.

5. As noted, this database was a federal law enforcement database. It could be used to query a telephone number where federal law enforcement officials had a reasonable articulable suspicion that the telephone number at issue was related to an ongoing federal criminal investigation. The Iranian number was determined to meet this standard based on specific information indicating that the Iranian number was being used for the purpose of importing technological goods to Iran in violation of United States law.

6. Use of the [REDACTED] database [REDACTED] that returned the 818 number was suspended in September 2013.<sup>1</sup> This database [REDACTED] is no longer being queried for

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<sup>1</sup> [REDACTED]

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investigatory purposes, and information is no longer being collected in bulk pursuant to 21 U.S.C. § 876.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to be 'R. Patterson', written over a horizontal line.

Robert Patterson  
Assistant Special Agent in Charge  
U.S. Drug Enforcement Administration