

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of )  
(Briefly describe the property to be searched )  
or identify the person by name and address) ) Case No. 21-889M(NJ)  
Location Information for Three Instagram )  
Accounts )  
)

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_  
(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before June 28, 2021 (not to exceed 14 days)

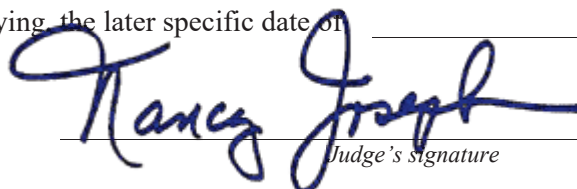
☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Nancy Joseph, U.S. Magistrate Judge  
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for \_\_\_\_\_ days (not to exceed 30) ☐ until, the facts justifying the later specific date of \_\_\_\_\_.

Date and time issued: June 14, 2021 @ 3:00 p.m.City and state: Milwaukee, Wisconsin


Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
<b>Certification</b>		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information associated with the following Instagram accounts, that is stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California:

- (1) Instagram account under the name “bigboomsologang”, Instagram ID # 32787502970,  
<https://www.instagram.com/bigboomsologang/>
- (2) Instagram account under the name “\_teshae”, Instagram ID # 25863395891;  
[https://www.instagram.com/\\_teshae/](https://www.instagram.com/_teshae/)
- (3) Instagram account under the name “shawn\_broke2rich”; Instagram ID# 7068849355;  
[https://www.instagram.com/shawn\\_broke2rich/](https://www.instagram.com/shawn_broke2rich/).

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Instagram, whose parent company is Facebook, Inc. (the “Provider”)**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc., Facebook Inc. is required to disclose the following information to the government, for the Accounts listed in Attachment A, all physical location data collected by Facebook Inc. for the user of the account, including any data collected by Facebook Inc.’s location services via the user’s mobile phone or other device, on a real-time or near-real time basis. Facebook Inc. is required to provide any such data they collect, regardless of the time of day.

#### **II. Information to be seized by the government**

All data disclosed by the Provider pursuant to this warrant. This data shall be made accessible by the Provider to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) on a continuous basis, day or night, and/or emailed to Special Agent Richard E. Connors at [Richard.ConnorsIII@atf.gov](mailto:Richard.ConnorsIII@atf.gov).

#### **III. Time for production by provider**

The Provider shall begin producing the information required by this warrant within 7 days of the date of service of the warrant.

#### **IV. Duration of production**

The Provider shall produce the information required by this attachment for a period of 30 days from the date of issuance of this warrant unless notified sooner to cease.

## UNITED STATES DISTRICT COURT

for the  
Eastern District of WisconsinIn the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)Location Information for Three Instagram  
AccountsCase No.  
21-889M(NJ)

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the \_\_\_\_\_ District of \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. 371, 922(g)(1), and 922(o).	conspiracy to violate the laws of the United States, unlawful possession of a firearm by a prohibited person, and unlawful possession of a machinegun

The application is based on these facts:

See the attached affidavit.

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

RICHARD CONNORS

Digitally signed by RICHARD CONNORS  
Date: 2021.06.14 14:32:25 -05'00'

Applicant's signature

Richard E. Connors, Special Agent (ATF)

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
 \_\_\_\_\_ telephone \_\_\_\_\_ (specify reliable electronic means).

Date: 06/14/2021

City and state: Milwaukee, Wisconsin

Honorable Nancy Joseph, U.S. Magistrate Judge

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

I, Richard E. Connors, 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 certain Instagram accounts (“Target Accounts”) that are stored at premises owned, maintained, controlled, or operated by Facebook Inc. (“Facebook”), an electronic communications service and/or remote computing service provider headquartered at 1601 Willow Road in Menlo Park, California. 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 Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID. The Target Accounts are described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B. I am seeking real-time location information for the Target Accounts from Facebook, Inc.

2. I am employed as a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) assigned to the Milwaukee Field Office since October 2015. I have been employed as a full-time law enforcement officer for approximately five years. I have received training at the Federal Law Enforcement Training Center in Glynco, Georgia. I attended the Criminal Investigator Training Program, as well as the ATF’s Special Agent Training Program. I have received training in the investigation of unlawful possession of firearms, unlawful transfer of firearms, and unlawful dealing in firearms without a license. Prior to becoming a Special Agent with the ATF, I received two bachelor’s degrees from Northern Illinois University in the fields of Sociology and International Relations. I have

received a master's degree from Northern Illinois University in the field of American Government.

3. I have received training in the investigation of firearm and drug trafficking. Based on my training, experience, and participation in firearm trafficking investigations, I know or have observed the following:

- a. I have utilized informants to investigate firearm and drug trafficking. Through informant interviews and debriefings of individuals involved in those offenses, I have learned about the manner in which individuals and organizations distribute these items in Wisconsin and elsewhere;
- b. I have also relied on informants to obtain firearms (as opposed to licensed gun dealers) and controlled substances from individuals, known as a controlled purchase;
- c. I have experience conducting street surveillance of individuals engaged in firearm and drug trafficking. I have participated in the execution of numerous search warrants where drugs, firearms, ammunition, and magazines have been seized;
- d. I am familiar with the language utilized over the telephone to discuss firearm and drug trafficking, and know that the language is often limited, guarded, and coded;
- e. I know that firearm and drug traffickers often use electronic equipment to conduct these operations; and
- f. I know that firearm and drug traffickers often use proceeds to purchase assets such as vehicles, property, jewelry, and narcotics. I also know that

firearm and drug traffickers often use nominees to purchase or title these assets to avoid scrutiny from law enforcement officials. I also know that firearm and drug traffickers may keep photographs of these items on electronic devices.

4. I have participated in multiple firearm and drug trafficking investigations that involved the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these devices. On many occasions, this electronic data has provided evidence of the crimes being investigated and corroborated information already known or suspected by law enforcement.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. 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.

6. Based on the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 371 (conspiracy to violate the laws of the United States), 18 U.S.C. § 922(g)(1) (unlawful possession of a firearm by a prohibited person), and 18 U.S.C. § 922(o) (unlawful possession of a machinegun) have been committed, are being committed, and will be committed by Larry G. HAMILTON (DOB: 07/22/1991), Teshae HANNA (DOB: 09/23/1999), and Quishawn HANNA (DOB: 10/10/2000) among others. There is also probable cause to believe that the location information described in Attachment B will constitute evidence of these criminal violations, and will lead to the identification of individuals who are engaged in the commission of these offenses.



### **TARGET ACCOUNTS TO BE LOCATED**

- Instagram account under the name “bigboomsologang”, Instagram ID 32787502970,  
<https://www.instagram.com/bigboomsologang/>
- Instagram account under the name “\_teshae”, Instagram ID 25863395891;  
[https://www.instagram.com/\\_teshae/](https://www.instagram.com/_teshae/)
- Instagram account under the name “shawn\_broke2rich”; Instagram ID 7068849355;  
[https://www.instagram.com/shawn\\_broke2rich/](https://www.instagram.com/shawn_broke2rich/)

### **JURISDICTION**

7. The court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

### **PROBABALE CAUSE**

8. Since February 2021, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Milwaukee Police Department (MPD), Federal Bureau of Investigation (FBI), and Drug Enforcement Administration (DEA) have been investigating members of the Wild 100’s, a violent street gang in Milwaukee, also known as the Shark Gang, including Larry G. HAMILTON, Teshae HANNA, and Quishawn HANNA.

9. In the summer of 2020, the Wild 100’s and Ghetto Boys Clique (GBC), another violent street gang in Milwaukee, also known as the Swindle Gang, were engaged in a bloody feud. Since July 2020, case agents have identified at least 20 separate incidents of firearms offenses and crimes of violence tied to the Wild 100’s and GBC. I have provided a summary of

the relevant incidents below based upon a review of police reports, information provided by confidential sources, and a review of publicly available social media posts.

10. On January 26, 2019, a shooting occurred in the area of 2461 North 33<sup>rd</sup> Street, Milwaukee, Wisconsin, resulting in the death of Lawrence “Lowski” Hamilton, a known member of the Wild 100’s, and multiple gunshot wounds to his brother Larry G. Hamilton (DOB: 07/22/1991). Sometime after the funeral, the grave of Lawrence Hamilton was desecrated by members of the GBC. Based on my training and experience, I know that desecrating a grave or memorial is a common way to disrespect a rival gang member and the gang itself. In a later shooting incident, Ramon Savage, another Wild 100’s member, told officers of the Milwaukee Police Department that the desecration of Lawrence Hamilton’s grave and memorial ignited the bloody feud between the Wild 100’s and GBC.

11. On July 23, 2020, officers of the Milwaukee Police Department responded to numerous shots fired near a playground at Maple Tree Elementary School, located at 6644 North 107<sup>th</sup> Street, Milwaukee, Wisconsin. Officers recovered 123 casings on scene in various calibers. This appeared to be celebratory gunfire, because no one was injured and several individuals, including Wild 100’s members, were suspected of discharging firearms into the air. Quishawn M. Hanna (DOB: 10/10/2000) was interviewed on scene by officers. Quishawn Hanna told officers that people were there to celebrate the anniversary of Lawrence Hamilton’s death, and people started shooting. This appears to actually have been on or about the birthday of Larry G. Hamilton.

12. On September 30, 2020, officers of the Milwaukee Police Department responded to a shooting at the funeral of Braxton Taylor, a GBC member. Seven victims suffered gunshot wounds. Witnesses said that members of the Wild 100’s were posting to social media around the

time of the funeral, suggesting that they may have been involved in the shooting. Later that day there were two other shootings, one at Braxton Taylor's memorial near 21<sup>st</sup> Street and Center Street, where a woman suffered a gunshot wound to the head, and the other where Quimain E. Townsend (DOB: 03/13/1991) and Ramon Savage (DOB: 06/13/1995), Wild 100's members, suffered gunshot wounds. Wild 100's members are suspects in the funeral home shooting, and GBC members are suspects in the shooting at Braxton Taylor's memorial and the shootings of Townsend and Savage.

13. In March 2021, case agents obtained law enforcement reports about Teshae Hanna's prior arrests, which revealed that he was arrested on an outstanding bench warrant on November 24, 2020, which led to the recovery of heroin, cocaine, and a firearm. On November 18, 2020, the Dane County Sheriff's Department entered a bench warrant for the arrest of Teshae Hanna for failing to appear for Dane County Case No. 2020CF000928, which charges Teshae Hanna with committing an armed robbery. On November 24, 2020, law enforcement officers assigned to the Milwaukee Police Department's SID and Tactical Enforcement Unit (TEU) responded to the address of 1109 North 18<sup>th</sup> Street, Apartment No. 910, Milwaukee, Wisconsin to locate Teshae Hanna.

14. During the investigation, law enforcement officers contacted the lessee of the apartment at the front door. While standing at the front door of Apartment No. 910, law enforcement officers observed Teshae Hanna standing in the bedroom wearing only underwear and attempting to get dressed. Law enforcement officers then entered the apartment and arrested Teshae Hanna. During the arrest and while in the bedroom, Teshae Hanna asked the officers to grab his jacket, shoes, money, and three cellular phones.

15. Police Officer Jose Viera spoke to the lessee of the Apartment No. 910, and the lessee provided law enforcement officers with consent to search the apartment. During the search, law enforcement officers located a clear plastic bag which contained suspected heroin and a plastic bag which contained suspected cocaine on the floor in the bedroom. Officers also located a silver-over-black Kahr Model CW40 .40 caliber semi-automatic handgun bearing serial number FF1315 underneath the mattress in the same bedroom. An officer later performed a field test on the suspected heroin, which tested positive for opiates and fentanyl for a total weight of 1.0 gram, and a field test on the suspected cocaine, which tested positive for cocaine with a total weight of 3.0 grams. Based upon training, experience, and the investigation to date, including the weight of the cocaine base and the lack of instruments used to ingest it, case agents believe that the cocaine base recovered from the bedroom where Teshae Hanna was arrested was for street-level distribution and not personal use.

16. Officers also located a white Apple iPhone on the floor in the same bedroom. I am aware that the bedroom where the suspected drugs, firearm, and white Apple iPhone were located in was the same as the bedroom in which Teshae Hanna was arrested and where his clothing, money, and three cellular phones were located.

17. On November 28, 2020, Teshae Hanna was charged in Milwaukee County Case Number 2020CF004203 with possession of a firearm after being adjudicated delinquent, bail jumping, possession with intent to distribute cocaine, and possession of narcotic drugs.

18. On March 14, 2021, I received a screenshot of the Instagram profile “\_teshae” (Instagram ID 25863395891, [https://www.instagram.com/\\_teshae](https://www.instagram.com/_teshae)) from the publicly viewable content on that day. An Instagram story is a short clip a user can post to his or her page, which is then removed after a given amount of time. The Instagram page has a URL of

[https://www.instagram.com/\\_teshae/](https://www.instagram.com/_teshae/). This page appears to belong to Teshae K. Hanna (DOB: 09/23/1999), in that case agents compared the photos from the publicly viewable content for “\_teshae” to a booking photo of Teshae Hanna, and the two appear consistent.

19. The screenshot taken on March 14, 2021 from the “\_teshae” Instagram page depicted eight firearms lying on a wood floor. Three of the firearms appear to be Glock handguns with conversion devices affixed to the back plate of the handgun. These conversion devices convert a semi-automatic firearm into a fully-automatic firearm, allowing the firearm to fire multiple rounds of ammunition with a single pull of the trigger, consistent with definition of a “machinegun” as defined in 18 U.S.C. § 921(a)(23) and 26 U.S.C. § 5845(b).



20. On March 15, 2021, officers of the Milwaukee Police Department on routine patrol observed Teshae Hanna run from a stopped black Toyota RAV4, while holding a black Glock pistol, toward the McDonalds located at 7112 North 76<sup>th</sup> Street, Milwaukee, Wisconsin. When Teshae Hanna returned to the vehicle, he did not appear to have a firearm. Officers then located Raymond J. Colon (DOB: 05/17/2000), who was dead, in the front seat of the black Toyota RAV4.

21. Officers recovered a Glock pistol bearing serial number XMW834 with an attached conversion device, which converts the firearm from semi-automatic to fully-automatic, from the trashcan.

22. During an interview with officers, Teshae Hanna said that they had been shot at by people in a vehicle, who had been following them. Teshae Hanna was injured in this shooting. Officers obtained surveillance video from the McDonalds, which showed Teshae Hanna discard the Glock pistol bearing serial number XMW834 in a trashcan outside of the McDonalds.

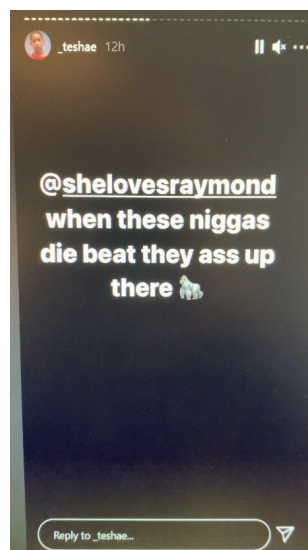
23. On March 18, 2021, case agents obtained a photograph of the Glock pistol bearing serial number XMW834 with the attached conversion device, which had been recovered from the McDonalds trashcan on March 15, 2021. The Glock pistol with the conversion device is consistent with the Glock handguns with conversion devices posted to the Instagram account “\_teshae” on March 14, 2021. A photograph of the Glock handgun with the conversion device recovered on March 15, 2021 is provided below.





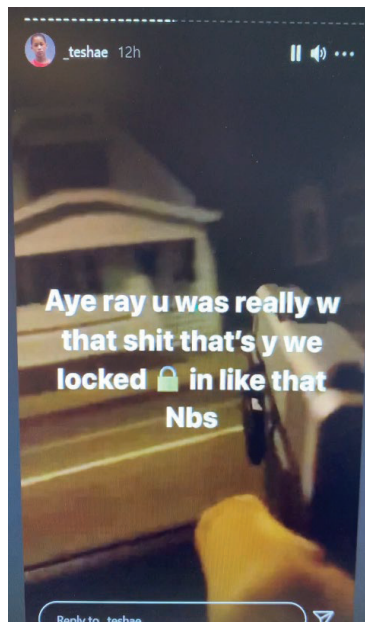
24. On March 16, 2021, Officer Michael Fasulo of the Milwaukee Police Department test fired the Glock pistol bearing serial number XMW834 with the attached conversion device. Officer Fasulo observed the conversion device attached to the rear back plate of the firearm, consistent with a machinegun. Officer Fasulo loaded two unfired cartridges into the firearm and conducted a single pull of the trigger. Both cartridges discharged with the single pull of the trigger—in accordance with the definition of a “machinegun” as defined in 18 U.S.C. § 921(a)(23) and 26 U.S.C. § 5845(b).

25. Another video from story of Instagram profile “\_teshae” depicts a two-tone silver-and-black handgun with a light and a green laser beam affixed to the firearm. Teshae Hanna posted a photo to this Instagram story stating: “I took a head shot so my opps got to receive the same treatment it’s only right (100 emoji; hand emoji).” The next post states: “@shelovesraymond when these niggas die beat they ass up there (gorilla emoji).” I know from debriefs of informants and viewing social media posts that the term “opps” refers to the opposition or the rival gang. Members of both the Wild 100’s and GBC use the term “opps” to refer to rivals. The 100 emoji refers to the Wild 100’s.





26. The next video in the series depicts a person, who appears to be Teshae Hanna, pointing the above-described firearm at houses which I believe are in Milwaukee, because Teshae Hanna's posts in prior videos in the story refer to locations in Milwaukee and the resemblance of the homes to those on the north and south side of Milwaukee. In the video, a green laser is hitting the siding of the houses. A screen shot from the video is posted below.



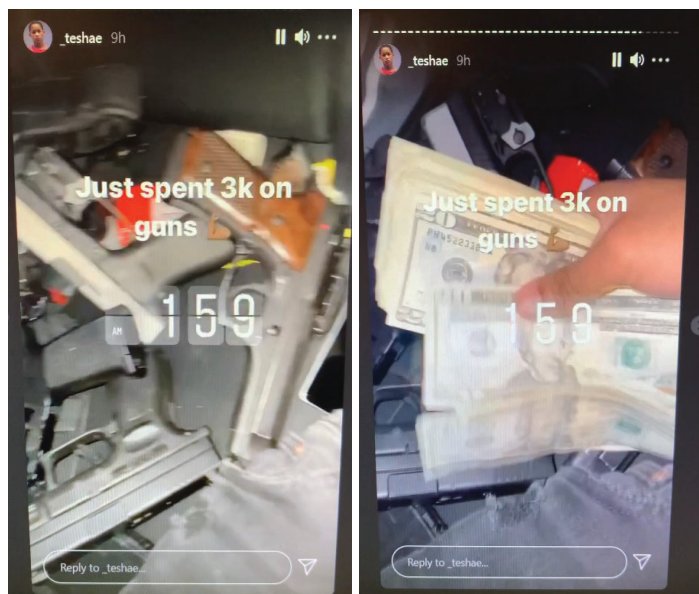
27. The following video has the caption “@shelovesraymond I shed tears bout u lilbro (crying emoji) I’ll do 100+ Nbs cause I know u a do the same.” Based on my training and experience, I believe that Hanna was referring to his willingness to serve 100 years in prison for retribution for Colon’s death.

28. At approximately 1:07 a.m. on March 24, 2021, Hanna posted a video on the Instagram profile “\_teshae” depicting himself near the ATM at the U.S Bank located at 7500 Good Hope Road, Milwaukee, Wisconsin 53223. In the video, Hanna proceeds to remove a debit card with the sticker still intact from the ATM. Hanna says in substance: “We on 76 getting a

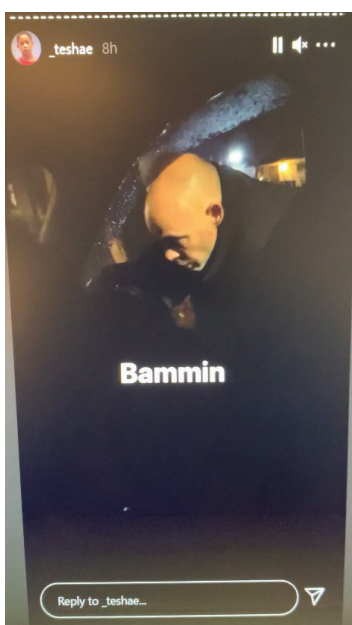
thousand right now.” The next video in the story has the caption “4K(money emoji).” The person in the video begins to fan out a large amount of United States currency.



29. The next video in the sequence has the caption: “Just spent 3K on guns (flex emoji) 1:59AM.” Teshae Hanna proceeds to drop multiple denominations of U.S. currency onto the suspected firearms. I observed what appeared to be three separate handguns and one suspected AR-15 style rifle in the video. Based on the videos observed, Hanna appeared to obtain money from an unknown debit account for the purpose of acquiring firearms.

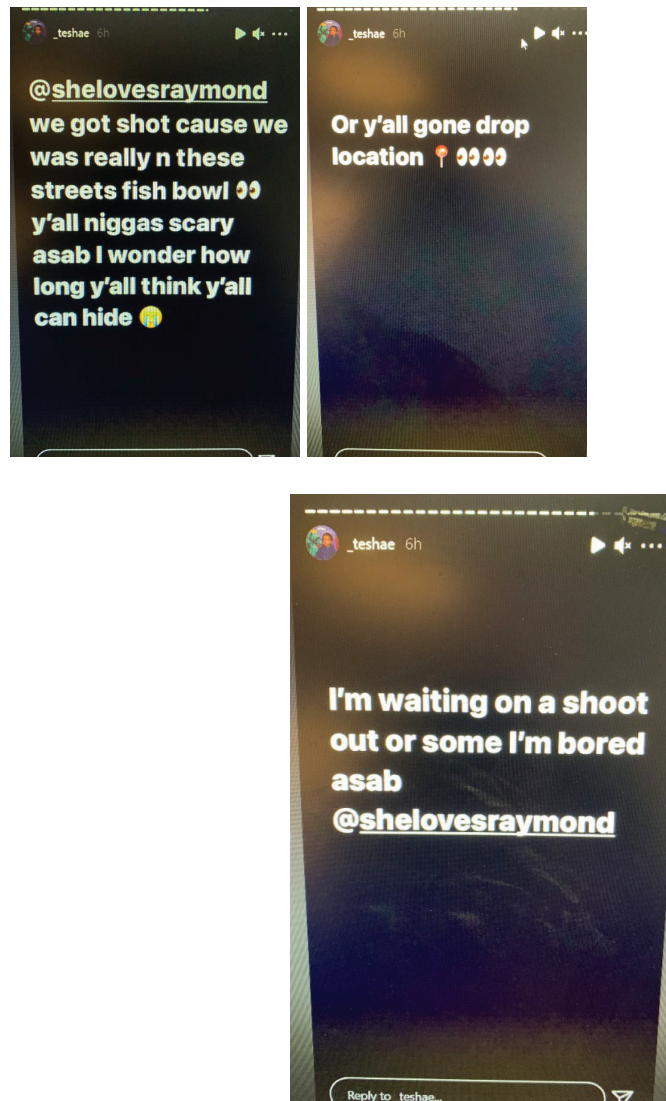


30. The last video in the sequence displays an unknown white male leaning into the passenger-side window of the vehicle Teshae Hanna is occupying. The caption on the video is “bammin.”

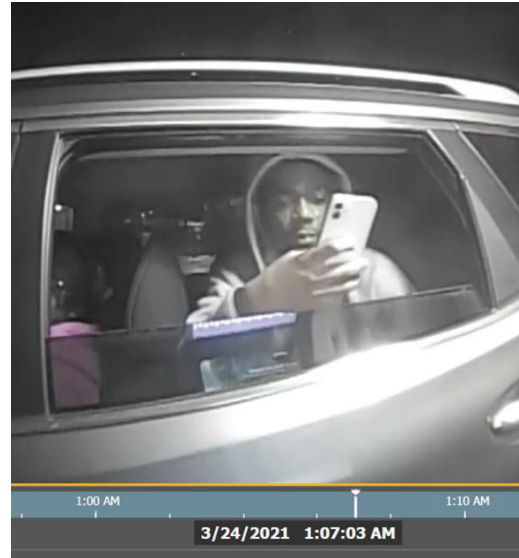


31. On March 30, 2021, I observed a post on the story of the Instagram profile “\_teshae” stating: “@shelovesraymond we got shot cause we was really n these streets fish bowl (eye ball emoji) y’all niggas scary asab I wonder how long y’all think y’all can hide (crying

emoji).” In the following post, Hanna states: “or yall gone drop location (pin drop emoji; eye ball emoji).” The final post says: “I’m waiting on a shoot out or some I’m bored asab @shelovesraymond.”



32. On April 12, 2021, Special Agent Ryan Arnold received U.S. Bank records of surveillance video from the ATM located at 7500 West Good Hope Road, Milwaukee, Wisconsin 53223. The video shows Teshae Hanna accessing the ATM and removing United States currency. It appears this is the same transaction Hanna posted about on his Instagram account. This transaction contains the timestamp of March 24, 2021 at 1:06 a.m.



33. On April 6, 2021, I observed the Instagram profile “\_teshae” was going “live.” A “live” video displays the user in real-time and individuals can join the conversation and comment or join the “live” video and also appear in real-time. This video was observed publicly, and I was able to view it by just having an Instagram profile. The other account which joined “\_teshae” was the Instagram profile “shawn\_broke2rich”; Instagram ID# 7068849355; [https://www.instagram.com/shawn\\_broke2rich/](https://www.instagram.com/shawn_broke2rich/). I am aware that the Instagram profile “shawn\_broke2rich” is used by Quishawn Hanna. Case agents compared the photos from the publicly viewable content for Instagram profile “shawn\_broke2rich” to a booking photo of Quishawn Hanna, and the two appear consistent.

34. In the live video posted on April 6, 2021 at approximately 1:56 p.m., I observed Teshae Hanna and Quishawn Hanna talking. Quishawn Hanna says: “I aint gonna show the switches on the live though I ain’t gone lie.” Based upon training, experience, and the investigation to date, case agents are aware that the term “switch” refers to a conversion device for a firearm, which converts the firearm from semi-automatic to fully-automatic. These conversion devices in themselves are classified as “machineguns” as defined in 18 U.S.C. §

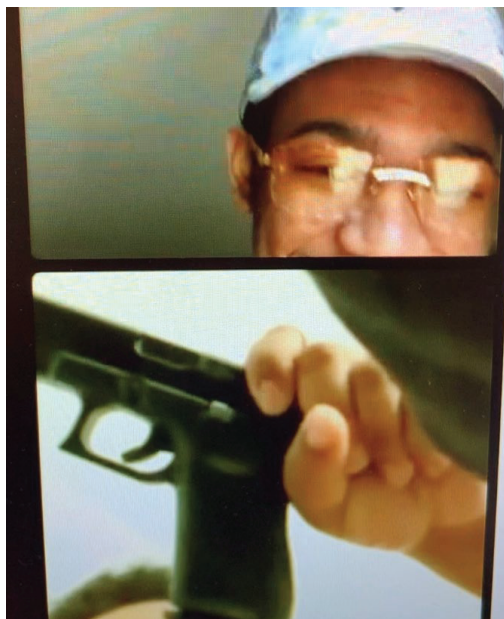


921(a)(23) and 26 U.S.C. § 5845(b). Quishawn Hanna appears to know that a person cannot possess a “machinegun” without meeting the registration requirements of the National Firearms Act.

35. Quishawn Hanna then displayed what appeared to be multiple firearms throughout the video, including a handgun and an AR-15 style rifle with a drum magazine capable of holding over 50 rounds of ammunition. Teshae Hanna displayed two handguns and pointed them directly at the camera numerous times. At approximately 1:01 in the video, Teshae Hanna states: “Niggas shot me in my head and killed my nigga Ray. That shit was just too funny, my nigga. Now the whole 40<sup>th</sup> grieving all because lil Keyon wanna talk shit bitch.” I believe that Teshae Hanna is referring to the homicide and shooting that occurred on March 15, 2021.

36. At approximately 3:00 in the video, Teshae Hanna states: “You see this weak ass gun before Quishawn Sig Sauer,” Teshae Hanna then displayed what appeared to be a Sig Sauer handgun. Quishawn Hanna states: “That motherfucker weak. We only do Glizzy’s only.” Based on my training and experience, I know that the street term “Glizzy” refers to a Glock firearm. Teshae Hanna proceeded to display what appeared to be a Springfield XD handgun and stated: “What about this? You don’t fuck with the XD.” Quishawn Hanna replies: “I’m the one that gave you that.” At approximately 3:50 in the video, Quishawn Hanna displays what appeared to be a Glock handgun with his hand covering the backplate of the firearm, this is the part of the firearm where individuals affix the conversion device to convert the firearm to a fully-automatic firearm. Quishawn Hanna states: “I aint gone show that.” Teshae Hanna replies: “Yea, yea, get that off the camera.” Quishawn Hanna states: “You show the back man motherfucker prolly go federal,” and Teshae Hanna replies: “yeah the feds be knocking on yo door lil bro.” Below is a

screenshot of Quishawn Hanna holding the Glock pistol with his hand covering where a conversion device ear would be affixed to the firearm.



37. Based upon Teshae Hanna and Quishawn Hanna's comments regarding not showing the portion of the firearm where a conversion device would be affixed and the comments regarding "going federal," I believe that Teshae Hanna and Quishawn Hanna are aware that possession of unregistered fully-automatic firearms are illegal. Case agents have also recovered fully-automatic Glock handguns from other Wild 100's members in the past.

38. At approximately 5:18 in the video, Teshae Hanna states: "Now I'm doing the same thing to them, nigga. Go have that funeral, lil bitch. Fuck you talking about fuck you mean nigga now nobody play with motherfuckin Teshae, nigga, or team Wild hunnits, nigga. We really where it's at. We got money, grave diggers. We got a lot of more money than the other niggas, and we grave diggers, and we get down that's the thing about our hood, nigga. We ain't to be played with nigga."

39. In March 2021, case agents located an Instagram account under the name “bigboomsologang,” Instagram ID 32787502970, <https://www.instagram.com/bigboomsologang/>. Case agents obtained and compared a booking photograph of Larry G. HAMILTON (DOB: 07/22/1991) to the photos on the publicly viewable part of the aforementioned Instagram page. Case agents believe based upon a review of the photographs, including “selfies,” of the person using the “bigboomsologang” Instagram page and HAMILTON’s booking photo that HAMILTON, an identified member of Wild 100’s, is the user of the Instagram profile “bigboomsologang.”

40. According to publicly available court records, HAMILTON has a prior felony conviction for burglary in Milwaukee County Case No. 2010CF005453 and a prior felony conviction for burglary in Milwaukee County Case No. 2011CF002979. HAMILTON also has a prior felony conviction for unlawful possession of a firearm by a prohibited person in Case No. 14-CR-169 (E.D. Wis.).

41. On April 1, 2021, case agents reviewed the below post that was posted to the publicly viewable portion of the Instagram profile “bigboomsologang” dated August 3, 2020, which depicts HAMILTON holding an AR-style pistol.





42. On April 1, 2021, case agents also viewed the below post that was posted to the publicly viewable portion of the Instagram profile “bigboomsologang” dated September 8, 2020, which showed HAMILTON holding an apparent AR-style rifle with a similar sight as the photo directly above.



43. On April 1, 2021, case agents also reviewed the below post that was posted to the publicly viewable portion of the Instagram profile “bigboomsologang” dated September 17, 2020, which depicts HAMILTON with an AR-15-style rifle slung from his neck.



44. On April 9, 2021, this Court issued a warrant for historical records and information for the Target Accounts in Case No. 21-MJ-084. Case agents have begun reviewing those materials. However, one of the warrant returns for the Target Accounts contained approximately 69,000 pages of records and information.

45. Case agents identified the following records of note on HAMILTON’s Instagram profile. On January 18, 2021, HAMILTON’s Instagram profile and Teshae HANNA’s Instagram profile “\_teshae” had the following conversation, after which the two profiles exchanged “live calls” not captured in Instagram warrant returns:

January 18, 2021: \_teshae: Who got heat for sell

January 24, 2021: Bigboomsologang: Yo this one ready.

I am aware that “heat” is a terminology for a firearm, and the conversation is indicative of firearm trafficking.

46. On January 11, 2021, HAMILTON’s Instagram profile communicated with the Instagram profile “goldhuncho,” the known profile for Chazz D. WHITE (DOB: 11/14/1990), another member of the Wild 100’s. In that conversation, the two discuss Maurice RITTMAN (DOB: 03/06/1993) getting his “dreak caught up.” I know that “drake” is terminology for an AK-47 style pistol. The two refer to RITTMAN using his alias “Foe block.”

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2021-01-11 19:43:00 UTC  
**Body** My cousin just got that I’m trying to buy it from em

**Author** goldhuncho (Instagram: 31578210968)  
**Sent** 2021-01-11 19:43:10 UTC  
**Body** He snapped

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2021-01-11 20:11:06 UTC  
**Body** Nbs

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2021-01-11 20:11:40 UTC  
**Body** We need that I’m trying to pay him top dolla rn rn for it

**Author** goldhuncho (Instagram: 31578210968)  
**Sent** 2021-01-11 20:48:50 UTC  
**Body** He ain’t tryna let it go

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2021-01-11 21:11:52 UTC  
**Body** Hell naw foe block got his dreak caught up

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2021-01-12 19:16:55 UTC  
**Body** □□□□□□stg I’m bout to roll that nigga up rn  
**Share** **Date Created** Unknown

I am aware that on December 18, 2020, officers of the Milwaukee Police Department recovered an AK-47 style pistol from a vehicle that RITTMAN was driving.

47. On September 20, 2020, HAMILTON's Instagram profile and Instagram profile "youngbboss2" discussed the sale and trade of firearms in the post below:

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 20:54:33 UTC  
**Body** N I need couple dollars n poket spent last on this shit to get back

**Author** youngbboss2 (Instagram: 18982236866)  
**Sent** 2020-09-20 20:54:35 UTC  
**Body** Let me see I will let you know

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 20:54:41 UTC  
**Body** Bet

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 21:11:38 UTC  
**Body** Or give me like 500 n a hand heat for the chopp

**Author** youngbboss2 (Instagram: 18982236866)  
**Sent** 2020-09-20 21:16:24 UTC  
**Body** Where the fuck you get that from

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 21:18:02 UTC  
**Body** I bought it 1500

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 21:18:13 UTC  
**Body** Wya

**Author** youngbboss2 (Instagram: 18982236866)  
**Sent** 2020-09-20 21:19:17 UTC  
**Body** 262 343 3838

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-20 22:35:31 UTC  
**Body** 4147456565 call me

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-21 00:40:31 UTC  
**Body** Yo wya

**Author** bigboomsologang (Instagram: 32787502970)  
**Sent** 2020-09-21 22:25:01 UTC  
**Body** Yo Wtw

I am aware that the term "hand heat" refers to a handgun and the term "Chopp" can refer to an AK or AR-style rifle. On September 19, 2020, a photo was posted of HAMILTON holding a suspected AR-15 style rifle:

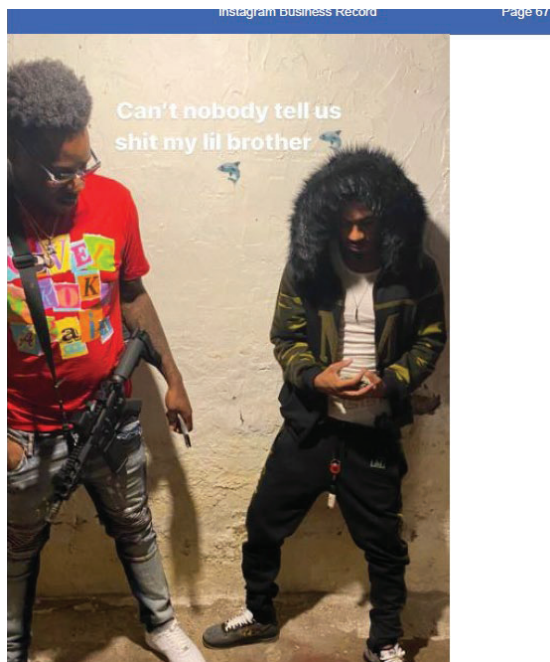




Photo ID 2401989710726913269

Another photo was posted on September 17, 2020 and depicts HAMILTON in possession of a suspected AR-15 style rifle.





The photograph below was posted on September 10, 2020 and depicts HAMILTON with a suspected drum magazine protruding from his front pocket.



48. On August 28, 2020, the following photo was posted to HAMILTON's

Instagram story.



It should be noted that an emoji with the mouth zipped shut is covering the backplate of a suspected Glock handgun. I am aware that several Wild 100's members have been caught with Glock handguns with a conversion device attached to convert semi-automatic firearms into fully-automatic firearms. Those conversion devices are commonly attached in the area covered by the emoji.

49. On August 4, 2020, a photo was posted of HAMILTON holding what appears to be a suspected AR-15 style rifle.



Photo ID 2367961182771748092  
Id 2367961182771748092  
Taken 2020-08-04 01:03:12 UTC

50. In the warrant return for Quishawn HANNA's Instagram profile "shawn\_broke2rich," case agents identified multiple conversations about Glock switches, conversion devices to convert a semi-automatic firearm into a fully-automatic firearm.

51. On September 18, 2020, an Instagram user communicates with Quishawn HANNA's Instagram profile "shawn\_broke2rich" asking about acquiring a Glock auto conversion device. Instagram profile "shawn\_broke2rich" references an individual nicknamed "Meechi," who investigators believe refers to Demetrius EXUM (DOB: 02/14/2001), a member of the Wild 100's.



**Author** \_atm\_atm\_atm\_atm (Instagram: 35404420781)  
**Sent** 2020-09-18 02:08:38 UTC  
**Body** U got a switch  
**Share** **Date Created** Unknown

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2020-09-18 02:22:50 UTC  
**Body** Them bitches around

**Author** \_atm\_atm\_atm\_atm (Instagram: 35404420781)  
**Sent** 2020-09-18 03:14:12 UTC  
**Body** Sale me one

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2020-09-18 03:15:54 UTC  
**Body** Gotta go to the city

**Author** \_atm\_atm\_atm\_atm (Instagram: 35404420781)  
**Sent** 2020-09-18 03:16:24 UTC  
**Body** How much let's go tomorrow

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2020-09-18 03:16:52 UTC  
**Body** Meechi know he told me about it

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2020-09-20 05:04:31 UTC

Quishawn HANNA's Instagram profile "shawn\_broke2rich" discusses coordinating a transfer of a "switch," referring to a Glock conversion device, between the Instagram user and "Meechi."

52. On February 19, 2021, the below conversation occurs where an Instagram account user asks the Instagram profile "shawn\_broke2rich" about purchasing a Glock auto conversion device.

**Author** maxinecarter\_ (Instagram: 409706419)  
**Sent** 2021-01-17 23:02:36 UTC  
**Body** Shawn

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-01-17 23:04:13 UTC  
**Body** Yea

**Author** maxinecarter\_ (Instagram: 409706419)  
**Sent** 2021-02-19 21:05:19 UTC  
**Body** Wnaaa buy a switch  
**Share** **Date Created** Unknown

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-02-19 21:13:29 UTC  
**Body** Video call started

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-02-19 21:13:47 UTC  
**Body** Video call ended

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-02-19 21:13:55 UTC  
**Body** Wats yo number

**Author** maxinecarter\_ (Instagram: 409706419)  
**Sent** 2021-02-19 21:14:15 UTC  
**Body** 4149403305

53. On March 6, 2021, the below conversation takes place between the page for Quishawn HANNA’s Instagram profile “shawn\_broke2rich” and an account with the name “forevalicereecekidd.” The account asks Quishawn HANNA for a “switch.”

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-06 00:25:05 UTC  
**Body** Wats good

**Author** forevalivereecekidd\_ (Instagram: 3423168416)  
**Sent** 2021-03-06 00:25:44 UTC  
**Body** Find me a switch for my glock

**Author** forevalivereecekidd\_ (Instagram: 3423168416)  
**Sent** 2021-03-10 12:13:32 UTC  
**Body** []  
**Share** **Date Created** Unknown  
**Url** [https://instagram.com/stories/shawn\\_broke2rich/2526233624358865999](https://instagram.com/stories/shawn_broke2rich/2526233624358865999)

54. On March 7, 2021, the profile for Teshae HANNA (\_teshae) asks the profile for Quishawn HANNA (shawn\_broke2rich) to “Bring me the choppa,” a street term for an AR or AK-style rifle.

**Author** \_teshae (Instagram: 25863395891)  
**Sent** 2021-03-07 00:20:51 UTC  
**Body** Bring me the choppa  
**Share** **Date Created** Unknown  
**Url** [https://instagram.com/stories/shawn\\_broke2rich/2523763959493567230](https://instagram.com/stories/shawn_broke2rich/2523763959493567230)

55. On March 17, 2021, Quishawn HANNA’s Instagram profile “shawn\_broke2rich” asks the Instagram profile “officialliberianpekin” if the individual has a Glock auto conversion device for sale.

**Current** 2021-04-21 18:57:36 UTC  
**Participants** officialliberianpekin (Instagram: 5900915278)  
shawn\_broke2rich (Instagram: 7068849355)

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-17 14:53:54 UTC  
**Body** You got switch for sale

**Author** officialliberianpekin (Instagram: 5900915278)  
**Sent** 2021-03-17 14:56:38 UTC  
**Body** Yea I’m on the E to Chicago rn though to sell some whatever I got left or if I have any left after ima hit you as soon as I’m back

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-17 15:02:53 UTC  
**Body** Ok

56. On March 29, 2021, an Instagram user asks Quishawn HANNA’s Instagram profile “shawn\_broke2rich” for a Glock auto conversion device. Quishawn HANNA states “Cant.” A video chat then began, which is not captured in the social media warrant return.

**Author** ghramcracker\_ (Instagram: 905643039)  
**Sent** 2021-03-29 22:48:16 UTC  
**Body** Let me kno if tryna sell switch I'll give u extra  
**Share** **Date Created** Unknown  
**Uri** [https://instagram.com/stories/shawn\\_broke2rich/2540384903972757642](https://instagram.com/stories/shawn_broke2rich/2540384903972757642)

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-30 01:08:24 UTC  
**Body** Cant🔪

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-30 23:45:52 UTC  
**Body** Wat happened  
**Share** **Date Created** Unknown

**Author** ghramcracker\_ (Instagram: 905643039)  
**Sent** 2021-03-30 23:46:40 UTC  
**Body** Finna call u

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-31 01:31:22 UTC  
**Body** Video call started

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-03-31 01:31:36 UTC  
**Body** Video call ended

**Author** shawn\_broke2rich (Instagram: 7068849355)  
**Sent** 2021-04-01 00:47:38 UTC  
**Body** Go put that shit ina crib  
**Share** **Date Created** Unknown

57. Lastly, law enforcement observed a recent social media post concerning the illegal possession of suspected automatic weapons by Quishawn HANNA. On or about the night of May 21, 2021, the Teshae HANNA's Instagram profile "\_teshae" reposted a screenshot from Quishawn HANNA's Instagram profile "shawn\_broke2rich" to the publicly viewable story for Teshae HANNA. In this post by Quishawn HANNA, a suspected Glock handgun is observed with an apparent Glock conversion device, which converts the firearm from semi-automatic to fully-automatic. The caption for the post reads: "I cant wait to switch a nigga up (emoji)". Quishawn HANNA appears to refer to the Glock conversion device when making this post to signify to other individuals he is armed with a fully automatic firearm.



58. Based on the evidence as set forth in this affidavit, case agents are aware that the subjects and targets of this investigation have used different means of Instagram communication (Instagram messenger) and private Instagram messaging on the Target Accounts to obtain, transfer, and discuss the use and possession of firearms, including converting firearms from semi-automatic to fully automatic machineguns.

59. I have been consistently live-tracking and reviewing social media accounts, including the Target Accounts, for approximately five months. In that timeframe, I have observed known Wild 100's members consistently post, brag, and tag each other in firearms activity, including federal firearms offenses, at least once a week. I have observed Teshae Hanna, Quishawn Hanna, and Larry G. Hamilton discuss the sale and possession of firearms, including firearms with conversion devices, through the Target Accounts. An Instagram location warrant

would assist investigators in tracking, locating, and identifying locations where these items may be kept and stored.

60. I also know these individuals use cellular phones to post on the Target Accounts, based on the prior warrant returns, the perspective and location of photos posted, and live videos. Quishawn Hanna, Teshae Hanna, and Larry G. Hamilton have displayed a transient lifestyle, in that they do not maintain a regular residence in Milwaukee. The location information sought will allow investigators to identify the locations where the targets are storing the firearms in question.

61. Based on the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 371 (conspiracy to violate the laws of the United States), 18 U.S.C. § 922(g)(1) (unlawful possession of a firearm by a prohibited person), and 18 U.S.C. § 922(o) (unlawful possession of a machinegun) have been committed, are being committed, and will be committed by Larry G. HAMILTON (DOB: 07/22/1991), Teshae HANNA (DOB: 09/23/1999), and Quishawn HANNA (DOB: 10/10/2000) among others. There is also probable cause to believe that the location information described in Attachment B will constitute evidence of these criminal violations, and will lead to the identification of individuals who are engaged in the commission of these offenses.

#### **BACKGROUND CONCERNING INSTAGRAM**

62. Instagram is a service owned by Facebook, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts, like the target account(s) listed in Attachment A, through which users can share messages, multimedia, and other information with other Instagram users and the general public.

63. Facebook collects basic contact and personal identifying information from users during the Instagram registration process. This information, which can later be changed by the user, may include the user's full name, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, credit card or bank account number, and other personal identifiers. Facebook keeps records of changes made to this information.

64. Facebook also collects and retains information about how each user accesses and uses Instagram. This includes information about the Internet Protocol ("IP") addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations. Facebook records this information in real-time and is capable of providing this information in real-time.

65. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if "added" to the primary account, can switch between the associated accounts on a device without having to repeatedly log-in and log-out.

66. Instagram users can also connect their Instagram and Facebook accounts to utilize certain cross-platform features, and multiple Instagram accounts can be connected to a single Facebook account. Instagram accounts can also be connected to certain third-party websites and mobile apps for similar functionality. For example, an Instagram user can "tweet" an image uploaded to Instagram to a connected Twitter account or post it to a connected Facebook account, or transfer an image from Instagram to a connected image printing service. Facebook maintains records of changed Instagram usernames, associated Instagram accounts, and previous

and current connections with accounts on Facebook and third-party websites and mobile apps.

67. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a “close friends list” for targeting certain communications and activities to a subset of followers.

68. Users have several ways to search for friends and associates to follow on Instagram, such as by allowing Facebook to access the contact lists on their devices to identify which contacts are Instagram users. Facebook retains this contact data unless deleted by the user and periodically syncs with the user’s devices to capture changes and additions. Users can similarly allow Facebook to search an associated Facebook account for friends who are also Instagram users. Users can also manually search for friends or associates.

69. Each Instagram user has a profile page where certain content they create and share (“posts”) can be viewed either by the general public or only the user’s followers, depending on privacy settings. Users can customize their profile by adding their name, a photo, a short biography (“Bio”), and a website address.

70. One of Instagram’s primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or stored on their devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of other users (“tag”), or add a location. These appear as posts on the user’s profile. Users can remove posts from their profiles by deleting or archiving them. Archived posts can be



reposted because, unlike deleted posts, they remain on Facebook's servers.

71. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are tagged in a post by its creator or mentioned in a comment (users can "mention" others by adding their username to a comment followed by "@"). An Instagram post created by one user may appear on the profiles or feeds of other users depending on a number of factors, including privacy settings and which users were tagged or mentioned.

72. An Instagram "story" is similar to a post but can be viewed by other users for only 24 hours. Stories are automatically saved to the creator's "Stories Archive" and remain on Facebook's servers unless manually deleted. The usernames of those who viewed a story are visible to the story's creator until 48 hours after the story was posted.

73. Instagram allows users to broadcast live video from their profiles. Viewers can like and add comments to the video while it is live, but the video and any user interactions are removed from Instagram upon completion unless the creator chooses to send the video to IGTV, Instagram's long-form video app.

74. Instagram Direct, Instagram's messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, videos, profiles, and other information. Participants to a group conversation can name the group and send invitations to others to join. Instagram users can send individual or group messages with "disappearing" photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can't view their disappearing messages after they are sent but do have access to each message's status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat

with each other directly or in groups.

75. Instagram offers services such as Instagram Checkout and Facebook Pay for users to make purchases, donate money, and conduct other financial transactions within the Instagram platform as well as on Facebook and other associated websites and apps. Instagram collects and retains payment information, billing records, and transactional and other information when these services are utilized.

76. Instagram has a search function which allows users to search for accounts by username, user activity by location, and user activity by hashtag. Hashtags, which are topical words or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be “followed” to generate related updates from Instagram. Facebook retains records of a user’s search history and followed hashtags.

77. Facebook collects and retains location information relating to the use of an Instagram account, including user-entered location tags and location information used by Facebook to personalize and target advertisements.

78. Facebook uses information it gathers from its platforms and other sources about the demographics, interests, actions, and connections of its users to select and personalize ads, offers, and other sponsored content. Facebook maintains related records for Instagram users, including information about their perceived ad topic preferences, interactions with ads, and advertising identifiers. This data can provide insights into a user’s identity and activities, and it can also reveal potential sources of additional evidence.

79. In some cases, Instagram users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such

communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

80. For each Instagram user, Facebook collects and retains the content and other records described above, sometimes even after it is changed by the user (including usernames, phone numbers, email addresses, full names, privacy settings, email addresses, and profile bios and links).

81. In my training and experience, evidence of who was using Instagram and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish 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.

82. For example, the stored communications and files connected to an Instagram account may provide direct evidence of the offenses under investigation. Based on my training and experience, instant messages, emails, voicemails, photos, and videos, including those from the Target Accounts discussed above, are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation.

83. In addition, the user's account activity, logs, stored electronic communications, and other data retained by Facebook 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, subscriber information, email and messaging logs, documents, and photos and videos (and the data associated with the foregoing, such as geo-

location, date and time) may be evidence of who used or controlled the account at a relevant time. As an example, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

84. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

85. Therefore, Facebook's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Instagram. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

### **CONCLUSION**

86. Based on the foregoing, I request that the Court issue the proposed search warrant.

87. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Facebook. Because the warrant will be served on Facebook, 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.

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information associated with the following Instagram accounts, that is stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California:

- (1) Instagram account under the name “bigboomsologang”, Instagram ID # 32787502970,  
<https://www.instagram.com/bigboomsologang/>
- (2) Instagram account under the name “\_teshae”, Instagram ID # 25863395891;  
[https://www.instagram.com/\\_teshae/](https://www.instagram.com/_teshae/)
- (3) Instagram account under the name “shawn\_broke2rich”; Instagram ID# 7068849355;  
[https://www.instagram.com/shawn\\_broke2rich/](https://www.instagram.com/shawn_broke2rich/).

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Instagram, whose parent company is Facebook, Inc. (the “Provider”)**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc., Facebook Inc. is required to disclose the following information to the government, for the Accounts listed in Attachment A, all physical location data collected by Facebook Inc. for the user of the account, including any data collected by Facebook Inc.’s location services via the user’s mobile phone or other device, on a real-time or near-real time basis. Facebook Inc. is required to provide any such data they collect, regardless of the time of day.

#### **II. Information to be seized by the government**

All data disclosed by the Provider pursuant to this warrant. This data shall be made accessible by the Provider to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) on a continuous basis, day or night, and/or emailed to Special Agent Richard E. Connors at [Richard.ConnorsIII@atf.gov](mailto:Richard.ConnorsIII@atf.gov).

#### **III. Time for production by provider**

The Provider shall begin producing the information required by this warrant within 7 days of the date of service of the warrant.

#### **IV. Duration of production**

The Provider shall produce the information required by this attachment for a period of 30 days from the date of issuance of this warrant unless notified sooner to cease.