**Affidavit in support of Search Warrant Application.**

I Alexander Woods, Analyst for the Department of Homeland Security (DHS) Being Duly sworn, depose and say:

1. I am currently assigned to the Louisiana Tech Division of Homeland Security. My duties include analyzing and investigating cyber crimes.

This affidavit is in support of the application for a warrant authorizing GOOGLE INC (“Google”) to provide law enforcement with any and all means of gaining access, including log in and password information, password reset or manufacturer reset code (“PUK”), in order to obtain the complete contents of hard drive held by Peter Falken.

1. The items requested to be seized to be seized are as follows:
2. All communication and data records between Falken and the Chinese Government. Any proprietary information obtained from Raymond Martin concerning Nethken Corporation, specifically information related to the AIDAN communication system. All information that pertains to the AIDAN satellite.

**Factual Background**

1. This case involves Peter Falken and Raymond Martin. Raymond Martin and Peter Falken have conspired to compromise and bring down an American surveillance satellite that was subsequently captured by the Chinese Government or its agents.
2. Peter Falken is an agent on loan to DHS from the NSA. Falken is part of the Cyber-Crime Joint Task Force and was a former Senior Information Specialist, Data Analyst, and Digital Forensics Specialist for the NSA. Currently works as an Information Counter-Intelligence Specialist for the NSA.
3. Through our investigation, we have determined that Raymond Martin conspired to bring down the AIDAN Satellite. Further investigation revealed that Raymond is working with Peter Falken for financial gain.
4. During the last programming of the communications board, Raymond Martin inserted a bug in the programming. We strongly believe that bug caused the subsequent failure and loss of the AIDAN Satellite.
5. Agent Falken lied to investigators during an FBI interview. Falken lied to the FBI about his whereabouts during the day in question, Thursday, July 26, 2012. We strongly believe that through his contacts with the NSA, he served as an intermediary between the Chinese Government and Raymond Martin at Nethken Corporation.
6. The need for this search warrant arose once we were able to ascertain that Peter Falken lied to investigators and is in fact working for the Chinese Government. Obtaining email content from Google, per insurance of the warrant, will allow law enforcement to gain access to contents of email relevant to this case.
7. Due to the nature and sensitivity of the investigation, it is requested that neither Falken nor Martin be notified by any means of communication regarding the information being requested by or provided to law enforcement.

Dated: July 27, 2012 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Alexander N. Woods Analyst Department of Homeland Security

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1. I am currently assigned to the Louisiana Tech Division of Homeland Security. My duties include analyzing and investigating cyber crimes.

This affidavit is in support of the application for a warrant authorizing GOOGLE INC (“Google”) to provide and law enforcement with any and all means of means of gaining access, including log in and password information, password reset or manufacturer reset code (“PUK”), in order to obtain the complete contents of email account(s) held by Peter Falken.

2.The items requested to be seized are as follows:

1. All content in his email including access to all email account(s) and password(s).

**Factual Background**

1. This case involves Peter Falken and Raymond Martin. Raymond Martin and Peter Falken have conspired to compromise and bring down an American surveillance satellite that was subsequently captured by the Chinese Government or its agents.
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