Affidavit in Support of Search Warrant Application

I, Brendan Hardin, Agent of the Department of Homeland Security (DHS) depose and say:

1. I am currently assigned to the Cyber Crimes Division of the DHS where my duties include investigating cybercrimes.
2. This affidavit is in support of an application for a warrant authorizing KIT to provide law enforcement with all and any means of gaining access, including all login and password information as well as any reset codes and manufacturer codes for the email server for KIT to gain access to specific email accounts of suspect employees. Additionally, I am requesting that an exact copy of the email server be created including the metadata for complete search of server traffic, including metadata, headers, send and receive information, subject, and message text, which will require hardware removal from the premises to be searched
   1. The items requested for search and seizure include.
      1. Email subscriber information including all information provided to begin an email account, not excluding reset password information as well as email addresses and passwords.
      2. The internal contacts list, including non-company addresses, which are stored within the email servers. This requested list includes all contacts to be searched as well as any copies of the list that exist in physical as well as any lists which exist as backups. This request is for all contacts that are included in all lists and is inclusive of all contacts.
      3. All metadata associated with the email server and any communication internally within KIT as well as all metadata associated with external communication. This aforementioned metadata does not exclude any headers or packets that were a part of the process of email transfer between the initial sender and the final intended recipient.
      4. All message content is also requested from the email servers. This content request includes all attachments. Attachments are defined as any file other than the text of the email that is added to the message, this includes all .jpg, .txt, .exe, .doc, and all other file types and extensions.
      5. All emails associated sent to KIT, including all metadata and attachments as previously defined.

I request search and seizure of these materials because there is strong evidence that KIT’s emails contain numerous other pieces of evidence that are important to establish a complete case. Khalid Mehmet, an employee of KIT who played a major role in the creation of the AI, also worked on other AI control mechanisms has the ability and motivation to take control of the MQ-10. Evidence from the contract that Mehmet signed, as well as the information in his biography, documents regarding his employment at CERN, and documents about his current occupation in Turkey reveal that he is a major suspect. Khalid Mehmet, as shown by his contract with the KIT to work on AI controls, was able to retain all files associated with the project. The files that Mehmet created for KIT are AI control mechanisms that give him the ability to take control of one of the MQ-10 drones. These drones were involved in the attack on Turkey, and the emails to be seized and searched have a strong potential to help the investigation.