

**Subject:** RE:

**From:** BRONWYN SEARS (States Attorney) <bronwyn.sears@cookcountyil.gov>

**Date:** 6/11/2013 4:12 PM

**To:** [REDACTED] <[REDACTED]@chicagopolice.org>

**CC:** "DANIEL MALONEY (States Attorney)" <daniel.maloney@cookcountyil.gov>

Jim--

Everything you've asked for is all part of our standard Pen order. (The advantage of working [REDACTED] huh)

Bronwyn P. Sears

[REDACTED]  
2650 S. California, 14 B 20

Chicago, Illinois

773-674-2872

773-674-2259 (fax)

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**From:** [REDACTED] <[REDACTED]@chicagopolice.org>

**Sent:** Tuesday, June 11, 2013 2:09 PM

**To:** BRONWYN SEARS (States Attorney)

**Cc:** DANIEL MALONEY (States Attorney)

**Subject:**

Thanks for all your help. [REDACTED]

Thanks  
[REDACTED]

FW: triggerfish language we use

**Subject:** FW: triggerfish language we use  
**From:** Summerville, Martin T. <martin.summerville@chicagopolice.org>  
**Date:** 6/7/2013 5:00 PM  
**To:** Costa, Jack J. <jack.costa@chicagopolice.org>

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**From:** Baker, Stephen (USAILN) [Stephen.Baker@usdoj.gov]  
**Sent:** Friday, June 07, 2013 4:28 PM  
**To:** Summerville, Martin T.  
**Subject:** triggerfish language we use

Stephen P. Baker  
Assistant U.S. Attorney  
United States Attorney's Office  
Northern District of Illinois  
312.353.1598  
stephen.baker@usdoj.gov

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— Attachments: —



triggerfish.wpd

71.5 KB

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA FOR AN  
ORDER RELATING TO TELEPHONES USED  
[REDACTED]

UNDER SEAL

No. [REDACTED]

James F. Holderman  
Chief Judge

APPLICATION FOR AN ORDER RELATING TO ANY CELLULAR TELEPHONES USED  
[REDACTED]

Rajnath Laud, an attorney of the United States Department of Justice, hereby applies to  
the Court for an order relating to any cellular telephone used by [REDACTED]

By this Application, the government requests that this Court enter an  
Order granting the following relief:

Authorizing investigating agents to use a pen register, in the form of a digital  
analyzer device (hereinafter "digital analyzer device"), [REDACTED]  
[REDACTED]

In support of this Application, applicant states the following:

### Authority to Seek Orders

1. Applicant is an "Attorney for the government" as defined by Federal Rule of Criminal Procedure 1(b)(1)(B) and, therefore, may apply for orders requesting the specified relief pursuant to 18 U.S.C. § 3122 (pen registers and trap-and-trace devices), 18 U.S.C. § 2703 (records concerning wire and electronic communications), and Federal Rule of Criminal Procedure 41 (search warrants).

### Factual Background

2. As more fully described in the attached Affidavit of [REDACTED]

[REDACTED]

3. Also as more fully described in the attached affidavit of [REDACTED]

[REDACTED], there is evidence that [REDACTED] has committed and is committing the Subject Offenses; that [REDACTED] and that the use of a digital analyzer device [REDACTED] will result in evidence of the commission of the Subject Offenses.

Request for Authorization to Use a Digital Analyzer Device

4. Applicant requests, pursuant to Rule 41 of the Federal Rules of Criminal Procedure<sup>1</sup> and Title 18, United States Code, Section 3127(3),<sup>2</sup> that this Court's order authorize

[REDACTED] to employ a digital

analyzer device, [REDACTED] with respect to any cellular telephone being used

by [REDACTED] for a period of 30 days, [REDACTED]

5. As set forth in the affidavit of [REDACTED], a digital analyzer device [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Applicant requests that this Court's order authorize [REDACTED]

[REDACTED] to use a digital analyzer device, [REDACTED]

[REDACTED]

[REDACTED] As discussed in the attached Affidavit, there is probable cause to believe that

[REDACTED]

[REDACTED] There is also probable cause to believe that the identification of [REDACTED] telephone(s) will lead to the discovery of evidence concerning the Subject Offenses.

7. Applicant requests that this Court's order, authorizing the use of a digital analyzer device with respect to any cellular telephone being used by [REDACTED]

[REDACTED]

8. Applicant further requests that this Court order that its Order and this Application be sealed until further notice of this Court, except that copies of the Order, in full or redacted form, may be served on law enforcement officers assisting in the investigation as necessary to effectuate this Court's Orders.

9. Pursuant to Rule 41(f)(3) and Title 18, United States Code, Section 3103a(b), the government further requests permission to delay notification of execution of any Order requested in this Application until June 4, 2013. As set forth in the Affidavit, providing immediate notification of the execution of the Order may have an adverse result as defined at Title 18, United States Code, Section 2705(a)(2), namely flight from prosecution, destruction of or tampering with evidence, and otherwise seriously jeopardizing an investigation. Moreover, as set forth in the Affidavit, the facts of this case justify a period of delay in excess of 30 days, and there is reasonable necessity for the seizure of the requested location information.

10. Applicant further requests that execution of any warrant issued with respect to the use of a digital analyzer device be authorized at any time of the day or night, good cause having been shown.

11. Applicant further requests that the government be ordered to commence execution of the use of a digital analyzer device within 10 days, and that any warrant issued in this matter shall be returned to this Court.

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

Executed on: [REDACTED]

---

RAJNATH LAUD  
Assistant U.S. Attorney  
219 South Dearborn St., Rm. 500  
Chicago, Illinois 60604



STATE OF ILLINOIS )

)

ss

COUNTY OF COOK )

AFFIDAVIT

I, [REDACTED], being duly sworn, state as follows:

**Background of Affiant**

12. I am a task force officer with [REDACTED]  
and have been so employed since approximately 2009. [REDACTED]  
[REDACTED]

**Basis and Purpose of Affidavit**

13. The information in this Affidavit is based on interviews of witnesses, my own observations and actions, information received from other law enforcement agents, my experience and training, and the experience of other agents.

14. This Affidavit is submitted for the limited purposes of establishing probable cause to believe that a criminal offense has been committed and that information relating to the use of any cellular telephone by [REDACTED] will lead to relevant and material information in the investigation of allegations that [REDACTED]

15. Because of the limited purpose of this Affidavit, I have not included all of the facts known to me or other law enforcement officers about the investigation.

**The Subject Phones**

16. The telephone phones that are the subject of the attached application are any cellular telephone used by [REDACTED]

17. As further set forth below, there is reason to believe that the cellular telephones being used by [REDACTED]

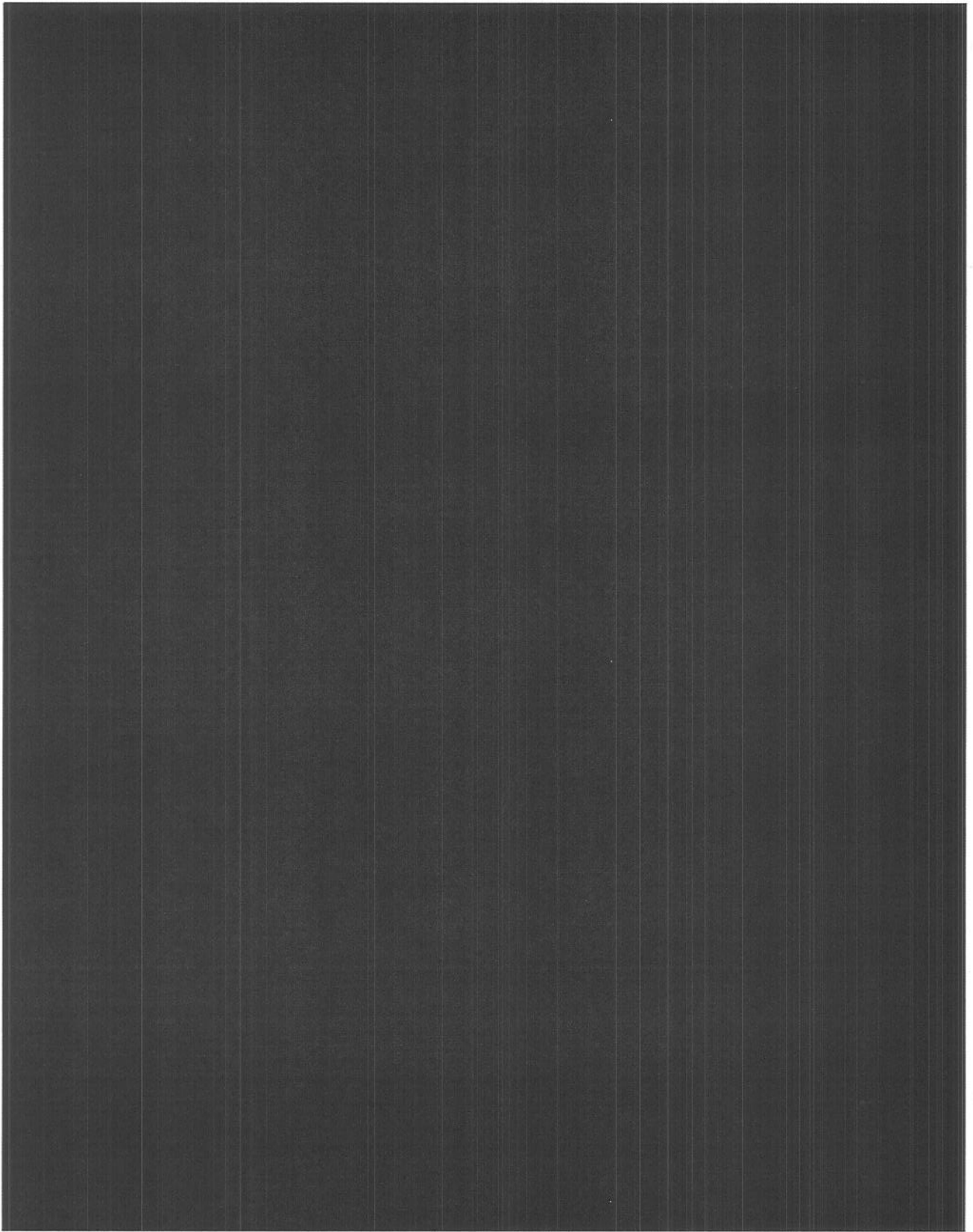
[REDACTED] and that information concerning [REDACTED] use of cellular telephones will provide evidence of the Subject Offenses. There is also evidence that [REDACTED]

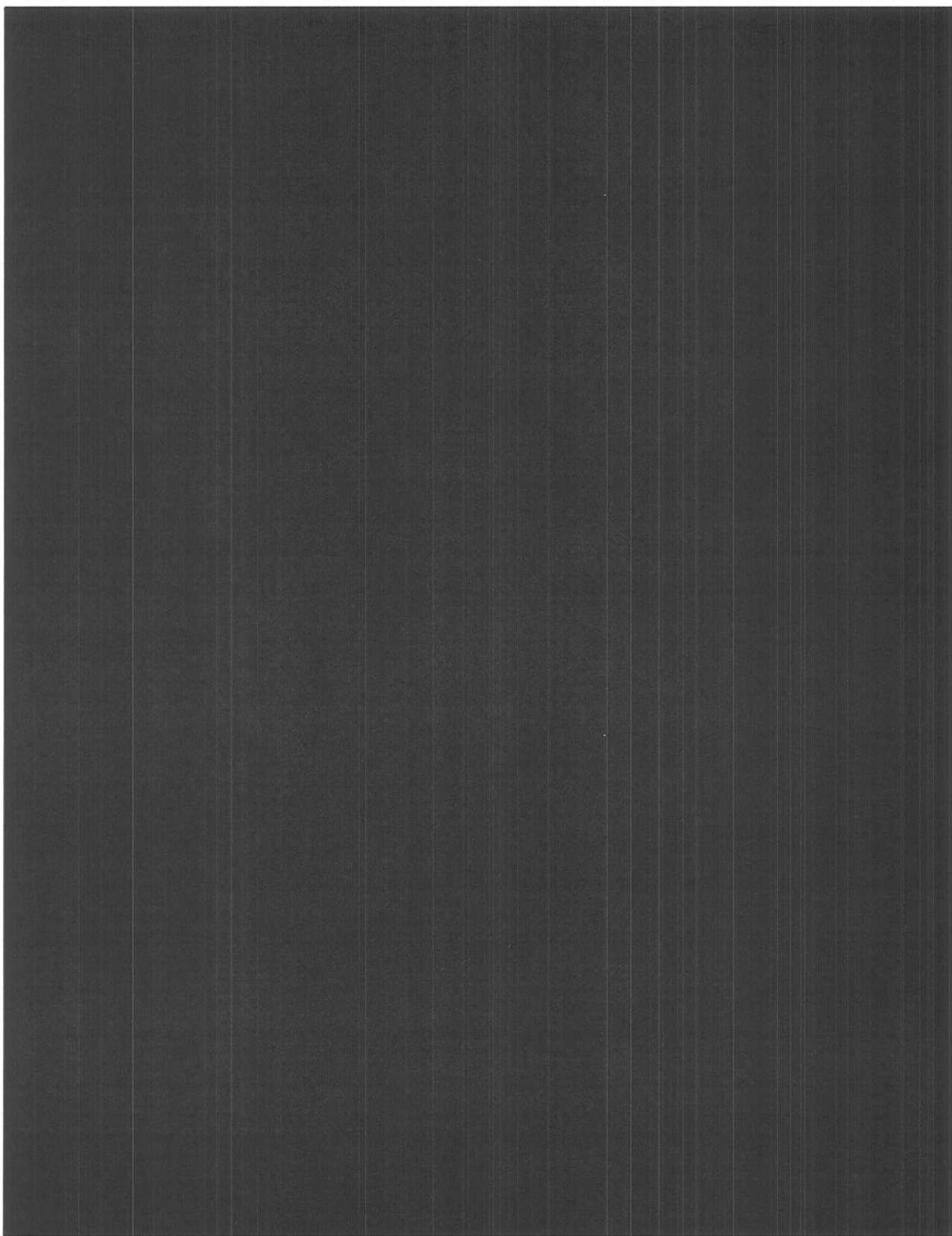
[REDACTED] has committed and is committing the Subject Offenses; that [REDACTED]

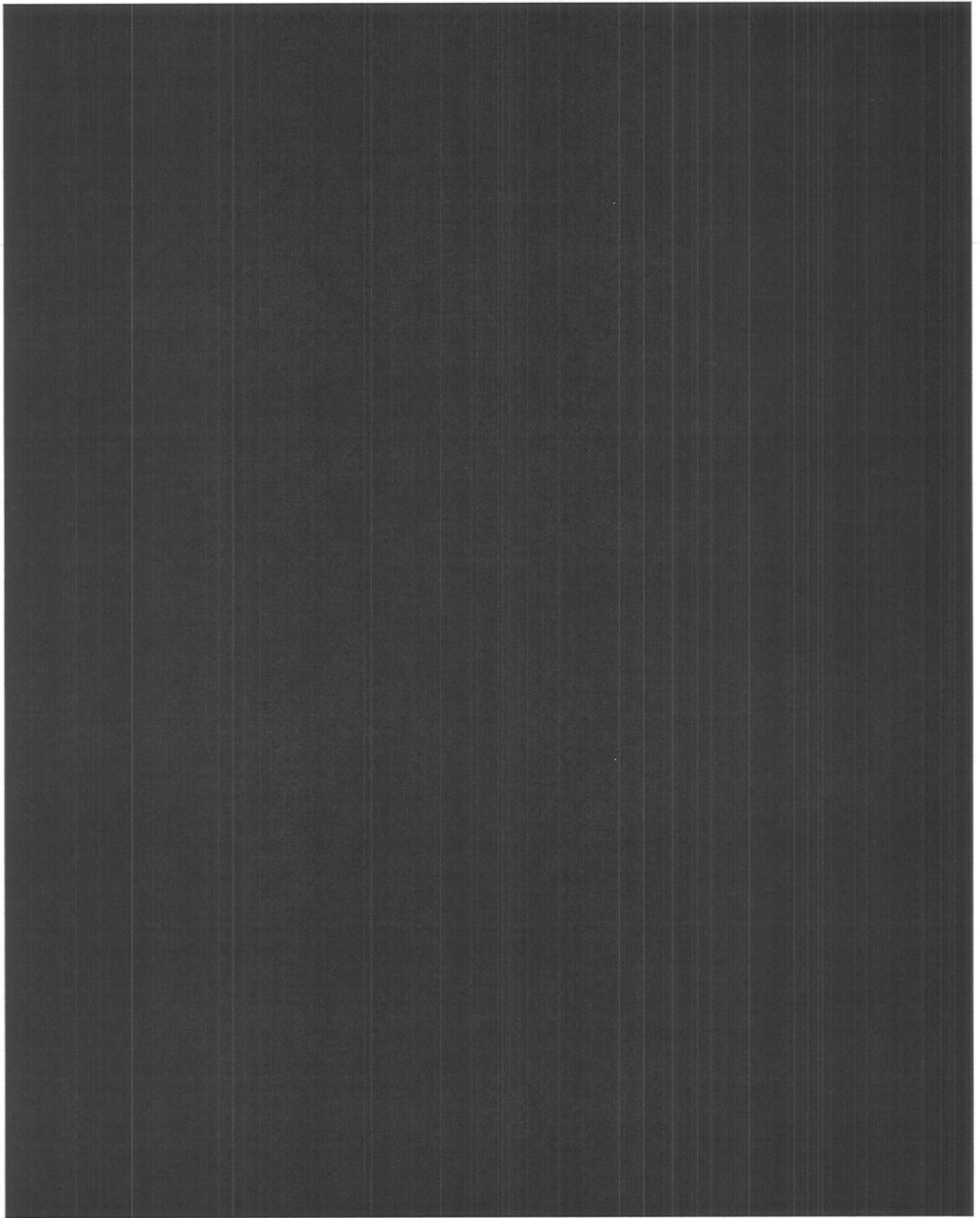
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

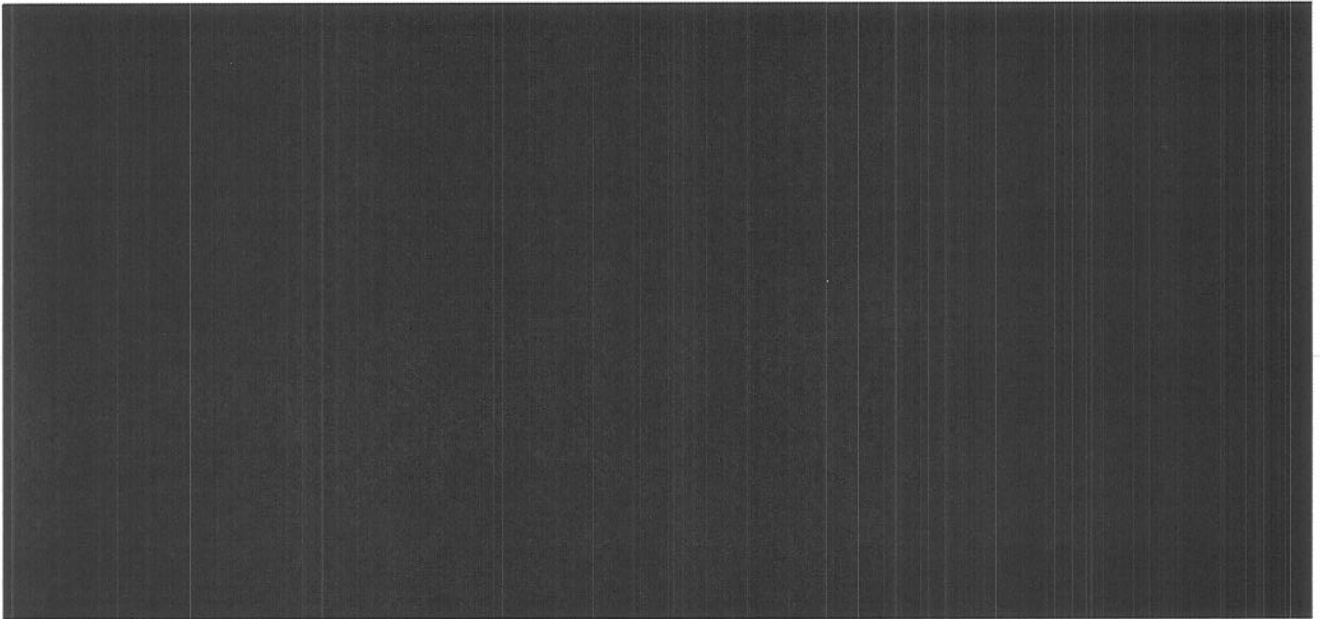
#### Background of the Investigation

[REDACTED]

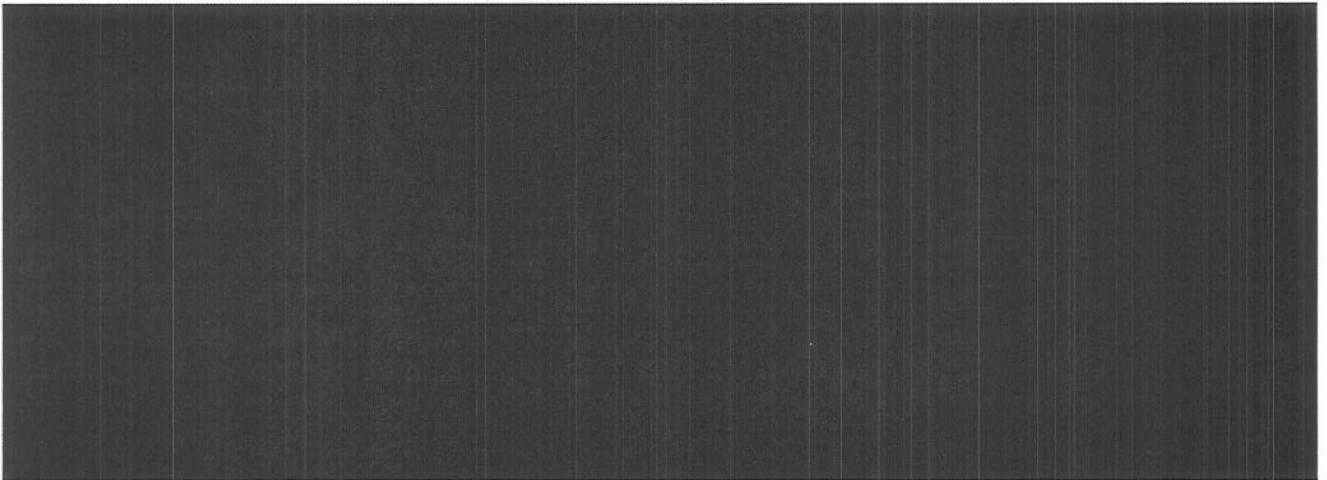








Planned Investigation





Request for Authorization to Use a Digital Analyzer Device

30. The attached application requests, pursuant to Rule 41 of the Federal Rules of Criminal Procedure and Title 18, United States Code, Section 3127(3), that this Court's order authorize [REDACTED] to use a pen register, in the form of a digital analyzer device (hereinafter "digital analyzer device") [REDACTED]

[REDACTED], for a period of 30 days [REDACTED]

[REDACTED]

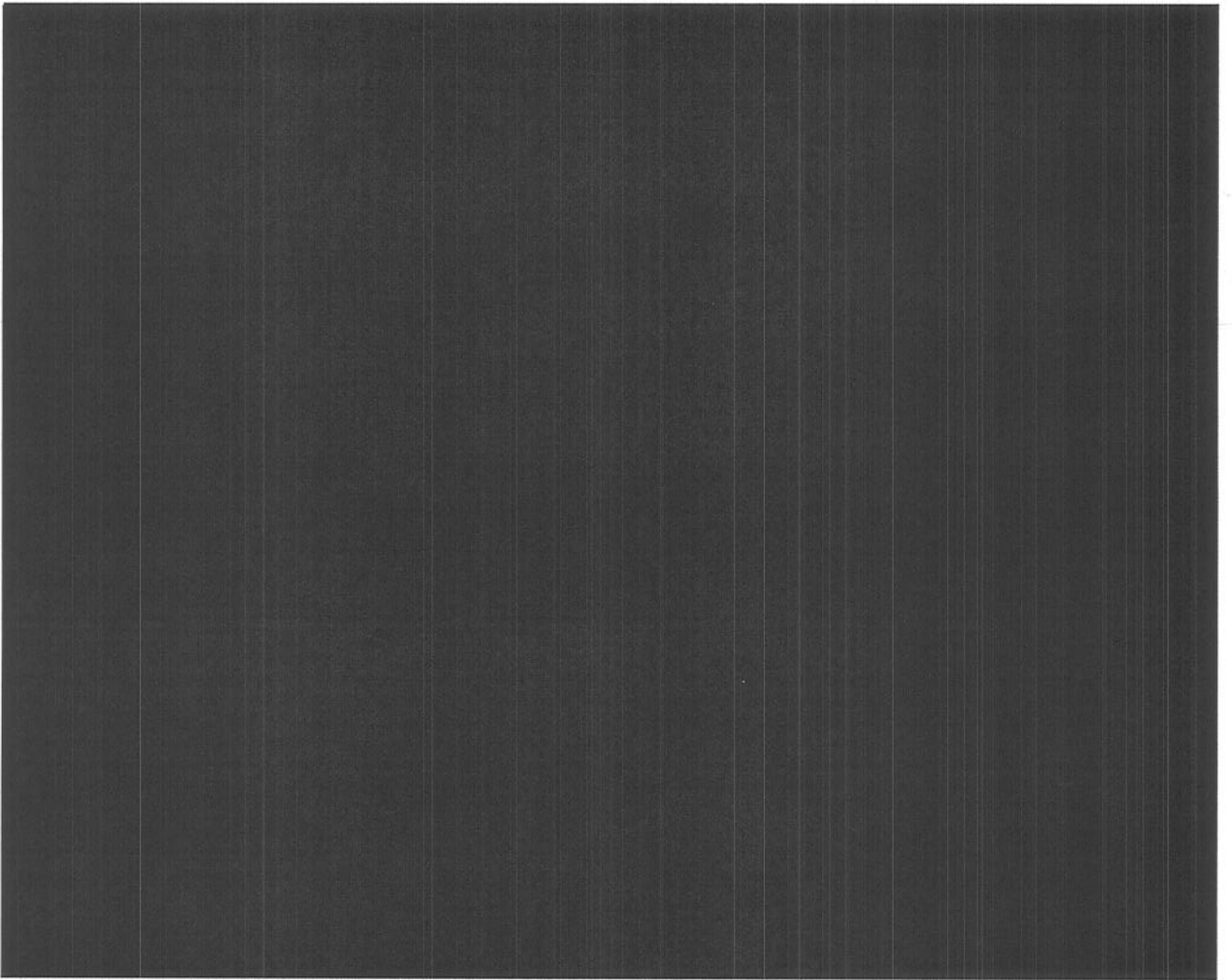
32. As explained immediately below, I believe there is probable cause to believe that

[REDACTED] are committing the Subject Offenses and  
that [REDACTED]

[REDACTED] [REDACTED]  
[REDACTED]

[REDACTED]





37. Providing immediate notification of the execution of any warrant requested in the attached application may have an adverse result as defined at Title 18, United States Code, Section 2705(a)(2), namely flight from prosecution, destruction of or tampering with evidence, and otherwise seriously jeopardizing an investigation, in that the investigation is currently covert in nature. Moreover, the facts of this case justify a period of delay in excess of 30 days, and as set forth above, there is reasonable necessity for the seizure of digital analyzer information related to cellular telephones used by [REDACTED]

FURTHER AFFIANT SAYETH NOT.

\_\_\_\_\_  
Subscribed and sworn to before me  
on this [REDACTED]

\_\_\_\_\_  
NOTARY PUBLIC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA FOR AN  
ORDER RELATING TO TELEPHONES USED  
[REDACTED]

UNDER SEAL  
[REDACTED]

James F. Holderman  
Chief Judge

RETURN AND CERTIFICATION

Date and time that monitoring of digital analyzer device commenced:

Period during which monitoring of digital analyzer device was conducted:

I swear that the foregoing is a true and accurate account of the date and time that monitoring of digital analyzer device commenced and the period during which the monitoring occurred.

\_\_\_\_\_  
\*\*\*AgentType\*\*\* [REDACTED]

Subscribed, sworn to, and returned before me this date: \_\_\_\_\_

\_\_\_\_\_  
Date

\_\_\_\_\_  
JAMES F. HOLDERMAN  
Chief Judge  
United States District Court  
Northern District of Illinois

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA FOR AN  
ORDER RELATING TO TELEPHONES USED [REDACTED]  
[REDACTED]

UNDER SEAL  
[REDACTED]

James F. Holderman  
Chief Judge

ORDER

THIS MATTER has come before the Court pursuant to an application by Rajnath  
Laud, an attorney for the government, which application relates to any cellular telephone used  
by [REDACTED]

In its Application, the government requests that this Court enter an order  
granting the following relief; and

Authorizing investigating agents to use a pen register, in the form of a digital  
analyzer device (hereinafter "digital analyzer device"), [REDACTED]  
[REDACTED]

Upon consideration of the government's Application:

IT IS ORDERED, pursuant to Title 18, United States Code, Section 3123 and Rule 41  
of the Federal Rules of Criminal Procedure, [REDACTED]

[REDACTED] may employ digital analyzer technology,

[REDACTED] with respect to any and all cellular telephones used by [REDACTED]

[REDACTED] at any time of the day or night, [REDACTED]

[REDACTED]

[REDACTED] The authority to employ a digital analyzer device

includes authorization for agents and employees of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IT IS FURTHER ORDERED that the government shall commence execution of this Order with respect to digital analyzer technology within 10 days.

IT IS FURTHER ORDERED that within 10 days after the termination of the execution of this Order with respect to digital analyzer technology, the government return this Order to the judge designated in this Order, together with an inventory advising this Court of the date and time that acquisition use of digital analyzer technology was first initiated and the period during which it was utilized.

IT IS FURTHER ORDERED that this Court's orders and the application be sealed until further notice of this Court, except that copies of the Order to Service Provider, in full or

redacted form, may be served by law enforcement officers assisting in the investigation, as necessary to effectuate this Court's Order.

IT IS FURTHER ORDERED that pursuant to Rule 41(f)(3) and Title 18, United States Code, Section 3103a(b), the government may delay notification of the execution of any Order issued in this matter regarding the cellular telephone being used by [REDACTED] until [REDACTED]

ENTERED:

\_\_\_\_\_  
HOLDERMAN

\_\_\_\_\_  
JAMES F.

Chief Judge  
United States District Court  
Northern District of Illinois

DATED: \_\_\_\_\_

FW: triggerfish language we use

**Subject:** FW: triggerfish language we use  
**From:** Summerville, Martin T. <martin.summerville@chicagopolice.org>  
**Date:** 6/7/2013 5:00 PM  
**To:** Costa, Jack J. <jack.costa@chicagopolice.org>

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**From:** Baker, Stephen (USAILN) [Stephen.Baker@usdoj.gov]  
**Sent:** Friday, June 07, 2013 4:28 PM  
**To:** Summerville, Martin T.  
**Subject:** triggerfish language we use

Stephen P. Baker  
Assistant U.S. Attorney  
United States Attorney's Office  
Northern District of Illinois  
312.353.1598  
stephen.baker@usdoj.gov

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-- Attachments:

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71.5 KB

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA FOR AN  
ORDER RELATING TO TELEPHONES USED  
[REDACTED]

UNDER SEAL

No. [REDACTED]

James F. Holderman  
Chief Judge

APPLICATION FOR AN ORDER RELATING TO ANY CELLULAR TELEPHONES USED

[REDACTED]  
[REDACTED] an attorney of the United States Department of Justice, hereby applies to  
the Court for an order relating to any cellular telephone used by [REDACTED]

By this Application, the government requests that this Court enter an  
Order granting the following relief:

Authorizing investigating agents to use a pen register, in the form of a digital  
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### Factual Background

2. As more fully described in the attached Affidavit of [REDACTED]

[REDACTED] are investigating allegations that [REDACTED]

3. Also as more fully described in the attached affidavit of [REDACTED]

[REDACTED], there is evidence that [REDACTED] has committed and is committing the Subject Offenses; that [REDACTED]

**Request for Authorization to Use a Digital Analyzer Device**

4. Applicant requests, pursuant to Rule 41 of the Federal Rules of Criminal Procedure<sup>1</sup> and Title 18, United States Code, Section 3127(3),<sup>2</sup> that this Court's order authorize

[REDACTED], to employ a digital

analyzer device [REDACTED] with respect to any cellular telephone being used

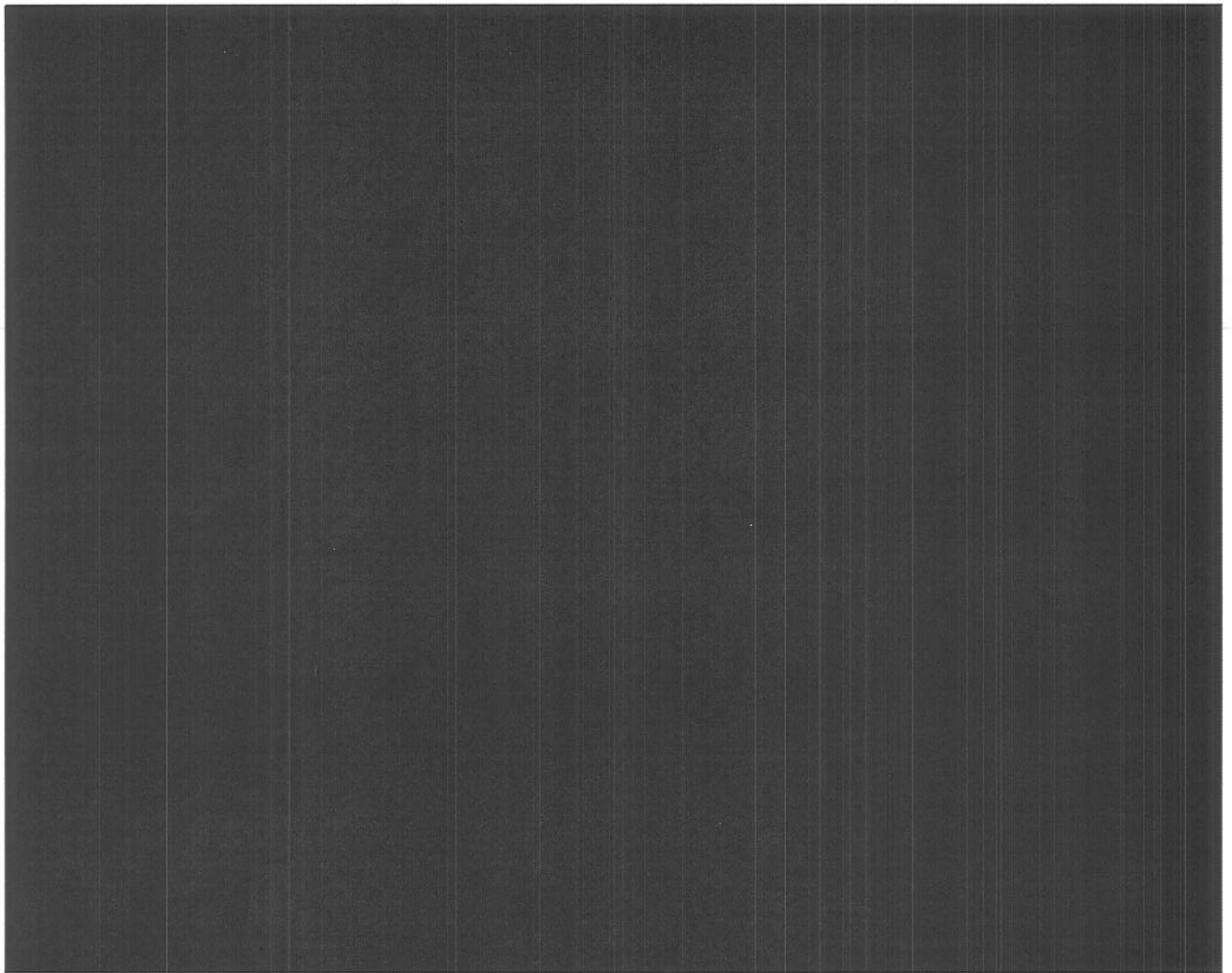
[REDACTED] for a period of 30 days [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



6. Applicant requests that this Court's order authorize [REDACTED]

[REDACTED] to use a digital analyzer device, [REDACTED]

[REDACTED] to [REDACTED]

[REDACTED] As discussed in the attached Affidavit, there is probable cause to believe that