19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA
WARRANT NUMBER: 17-94670

AFFIDAVIT FOR SEARCH WARRANT

I, Reese Jenkins , an Investigator with the Baton Rouge Police Department, Affiant, now submits to the undersigned Judge authorized to issue warrants in criminal cases, and makes this affidavit, under oath, in support of the issuance of a search warrant, to search the following described item:

Iphone with black case phone #[redacted]

Which is owned by or currently under the control of:

BRPD Homicide

EBR4354624

Affiant requests the issuance of a search warrant and to seize and examine electronic data including, but not limited to:

1. **Any voice messages, text message, phone numbers, pictures, GPS, and other electronic data and or media contained within the hardware, or cellular operating system of the cellular phone that identifies the owner and or possessor of the cellular phone.**
2. **Any and all voice messages, text messages, phone numbers, pictures, GPS, and other electronic data and or media contained within the hardware, software, and or microprocessors of the cellular phone related to the below listed crimes.**
3. **Any Voice messages, text message, phone numbers, pictures, GPS, and other electronic data and or media contained within the Mini Secure Digital (MiniSD), MultiMedia Card Mobile (MMCmobile), or any other types of card slots support removable memory cards or specialized peripherals, such as an SDIO Wi-Fi card and or cellular operating system related to the below listed crimes.**
4. **Any photographs, text messages, phone logs, or GPS information located within the internal memory of the cellular phone related to the below listed crimes.**
5. **Any and all hidden, erased, compressed, password protected, and/or encrypted files as they relate to the below listed crimes.**
6. **Photographs of the interior and exterior of the cellular phone**
7. **DNA swabs both interior and exterior of the cellular phone**
8. **Latent prints of both interior and exterior of the cellular phone**
9. **Any and all voice messages, text message, phone numbers, pictures, GPS, and other electronic data**

and or media contained within Wireless communications such as infrared (i.e., IrDA) or Bluetooth that may be built in the device related to the below listed crimes.

10. **Personal Information Management (PIM) applications that includes phonebook and date book facilities, and a means to synchronize PIM information with a desktop computer.**

Which are believed to contain evidence of the crime(s) of:

1 Count of 14:30.1--Second Degree Murder-- (FELONY)

Affiant advises the court; that dependent upon scheduling and technical issues, the examination of the aforementioned electronic data may be extended beyond the 10 day limitation typically placed upon execution of a search warrant and that electronic data exceeding the scope of the items to be searched for will be "imaged" and may be viewed during the technical search for the item enumerated above.

Affiant says that he has probable cause to believe that the above-listed information to be seized are now concealed and located within the above-described electronic device, based upon the following facts:

On Sept 12, 2017, at 2232 hours, Uniform Patrol was dispatched to 3400 block of Florida Blvd, in reference to a deceased b/m in the roadway. It appeared as he sustained several fatal gunshot wounds. Homicide detectives learned from eye witness accounts that a w/m subject wearing dark clothing exited a small red 4 door vehicle and approached the victim at a bus stop. The white male subject then fired a handgun at the victim several times shooting the victim which caused his death. The white male subject then re-entered the same red vehicle and fled the scene.
On Sept 14, 2017, at 2308 hours, Uniform Patrol responded to a shooting victim at 3014 Alaska Street. During the investigation detectives learned that a w/m subject operating a red vehicle that matches the description for the homicide that occurred on September 12, exited the vehicle and shot the b/m victim. The subject was described wearing dark clothing on both incidents and driving a red car.
Detectives then canvased the area on both homicides for video surveillance and discovered video of a w/m subject operating a red vehicle. This vehicle appeared to be a red Ford Focus, 4 door, and a w/m subject was operating the vehicle. The vehicle on video was in the immediate area during the same time frame of the first homicide. In additional the w/m subject was observed on video removing the license plate from the vehicle during this period. Detectives also observed in the video footage that the vehicle had a noticeable dent in the driver's side rear bumper. It also had a decal of an American flag just left of the license plate.
On 9-16-17, at approx 1500 hours, Uniform Patrol Officers observed a red Ford Focus bearing La license plate # ZNA068 at the Hammond Aire shopping center 9000 Airline Hwy, that matched the description of the suspect's vehicle and conducted a traffic stop. The white male subject who was operating the vehicle was detained for questioning. Homicide Detectives arrived shortly thereafter and observed that the vehicle was a positive match to that of the video surveillance of the first homicide.

Once the Defendant was detained he was advised of his Miranda rights. He was also found to be in possession of a black IPHONE with a black case. The Defendant gave Detectives his phone number of [redacted]
During post Miranda questioning the subject placed himself in the area of Alaska street at the same time of th

reported homicide, (Donald Smart). Detectives spoke with the Suspect's parents who informed us that the suspect had bought a 9mm handgun and kept it in his room in a case. They also stated that they within the last 2 weeks they observed 9mm ammunition in the suspects room. During post Miranda questioning the suspect stated that he in fact had a handgun but that he had thrown it away. The subject advised that he always keeps his cellular phone on him.

NOTE: There were 9mm casings found at both mentioned homicides. The shell casings from both homicides were ballistically compared and found to be from the same firearm.

Detectives assert that cellular phones are used for assortment of of personal information, including GPS location, communications, internet searches, Photographs, video Etc. Which is the information inside the cellular phone may collaborate or contradict the subjects statements he provided post Miranda to detectives.

As described in this affidavit, computer hardware, software, and data are instrumentalities and evidence in the commission of this crime. Based on my training and experience, I know that searching and seizing information from computers requires all electronic storage devices (along with related peripherals) to be searched later by qualified computer experts in a controlled environment. A search of computer records will need to be conducted off-site. An off-site search is necessary because computer storage devices (like cell phone memory and memory cards) can store the equivalent of thousands of pages of information. Additionally, a suspect may try to conceal criminal evidence; he/she might store it in random order with deceptive file names. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending upon the volume of data stored, and it would be impractical to attempt this kind of data search on site. Further, searching computer systems, including cell phones, for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data. Data search procedures are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden", erased, compressed, password protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap") a controlled environment is essential to its complete and accurate analysis. Based on my training and experience and consultation with technical computer experts, many system storage devices require particular input/output devices in order to read the data on the system. It is important that the analyst be able to properly retrieve the evidence listed above. In addition, the analyst needs the relevant system software (operating systems, interfaces, and hardware drivers) any applications software which may have been used to create the data (whether stored on hard drives or on external media), as well as all related instruction manuals or other documentation and data security devices.

The electronic device(s) was (were) collected as evidence due to possible information that is believed to be stored on the electronic devices supporting the aforementioned charges. Information believed to be on the electronic devices consists of contact lists, call log, open/unopened SMS/Text & MMS open/unopened email, open/unopened voicemails, notes, documents, photographs, video, applications and/or any other forms of electronic information. The device is to be searched under the conditions and according to the protocols established by the agency for such computer forensic examination.

Reese Jenkins

Reese Jenkins
Baton Rouge Police Department

Sworn to and subscribed before me, this 16 day of 9 , 2017 at 10:57:04 in EAST BATON ROUGE Parish, Louisiana.

Trudy M White

Trudy M White

Judge, Judge