\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*INSTRUCTIONS\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

-This search warrant mask is specifically for the search of Instagram for all data associated with the identified account name, pen registry and location data

-There is RED text below that needs to be changed based on the needs of your search warrant.

-There is BLUE text below which is provided for information to the reader about what is being requested and why. Make sure you read this information and understand it since you are putting it your search warrant. You may need to adjust some of the wording or content in these areas to the specifics of your case.

- After the warrant is finalized, highlight all of the text by selecting CTRL+A and then change all text to black

-It would be a good idea to delete this section before printing/sending your warrant to get signed.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*PLEASE DELETE\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

Case No:

COUNTY OF LARIMER ) IN THE COMBINED COURT

 ) SS

STATE OF COLORADO )

**AFFIDAVIT FOR SEARCH WARRANT AND EX PARTE COURT ORDER AUTHORIZING USE/INSTALLATION OF A PEN REGISTER AND TRAP AND TRACE DEVICE, GEOGRAPHICAL LOCATION INFORMATION, AND AUTHORIZING RELEASE OF SUBSCRIBER INFORMATION**

BEFORE THE HONORABLE \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 JUDGE / MAGISTRATE

Affiant, YOUR NAME HERE, a commissioned law enforcement officer, being duly sworn, deposes and states that I have probable cause to believe that at the place or business entity known or described as:

**Meta Platforms, Inc.** (parent company for Instagram)

**1 Meta Way**

**Menlo Park, CA 94025**

**Served via Instagram Law Enforcement Portal at:**

**https://facebook.com/records**

The following records, data, or information for Instagram user identified by username(s): INSTAGRAM ID between the dates of DATE OF INTEREST through DATE OF INTEREST for evidence of the crimes CRIMINAL OFFENSE:

* All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Instagram passwords, Instagram security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;
* Additional Instagram accounts that were registered to the email address and/or phone number(s) utilized to establish the account;
* All Accounts associated by device or cookie: to include User ID, subscriber name, cellphone number and email address.
* All devices(s) used and otherwise associated with the subscriber’s account – ESN, ICCID, IMSI, IMEI and MAC address numbers and activation dates;
* All activity logs for the account and all other documents showing the user’s posts, stories and other Instagram activities;
* All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them and any associated metadata [camera make, model, capture date and time, capture latitude and longitude, etc.] and original sized image associated with those images and videos;
* All profile information; news feed information; status updates; links to videos, photographs, articles, and other items; notes; wall postings; friend lists, including past and present friends along with the associated friends’ Instagram user identification numbers; groups and networks of which the user is a member, including the groups’ Instagram identification number(s) and Instagram identification number(s) of all group or network members; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Instagram applications;
* All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending “Friend” requests;
* All “check ins” and any other location information, including location history data;
* All Future and Past “events” the user responded to;
* All IP logs and associated port IDs, including all records of the IP addresses that logged into the account;
* All records of the account’s usage of the “Like” and “Follow” features, including all Instagram posts and all non-Instagram webpages and content that the user has “liked” and/or “followed”;
* All records of the account’s usage of the “Share” feature, including all Instagram posts and all non-Instagram webpages and content that the user has “shared”;
* All information about the Instagram pages that the account is or was a “fan” of;
* All records of Instagram searches performed by the account;
* The types of service(s) utilized by the user, the length of service(s) (including start date), and the means and source of any payments associated with the service(s) (including any credit card or bank account number);
* All privacy settings and other account settings, including privacy settings for individual Instagram posts and activities, and all records showing which Instagram users have been blocked by the account;
* All records pertaining to communications between Instagram and any person regarding the user or the user’s Instagram account, including contacts with support services and records of actions taken.
* All records including all above listed information of any Facebook account linked to or associated to the listed Instagram account.

For which a search warrant and court order may be issued upon one or more of the grounds set forth in 18 U.S.C. §2703 (Stored Communications), 18 U.S.C. §§3122 and 3123 (Pen Register and Trap and Trace), C.R.S. §16-3-301 (Search Warrant), §16-3-301.1 (Production of Records), §16-3-303.5 (Location Tracking), and Crim. P. 41 (Search Warrant), namely that this property is stolen or embezzled, or is designed or intended for use as a means of committing a criminal offense, or is or has been used as a means of committing a criminal offense, or the possession of which is illegal or would be material evidence in a subsequent criminal prosecution in this state or another state or federal court, or the seizure of which is expressly required, authorized or permitted by any statute of this state or the United States, or which is kept, stored, maintained, transported, sold, dispensed, or possessed in violation of a statute of this state, under circumstances involving a serious threat to public safety or order or to public health; or which would aid in the detection of the whereabouts of or in the apprehension of a person for whom a lawful arrest warrant is outstanding.

The facts establishing grounds for issuance of a search warrant and showing probable cause to believe that they exist are as follows:

**Electronic Definitions**

“Internet” means a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are physically located in the same state.

“Computers”, “digital media storage”, or “digital storage devices” may be used interchangeably, and are intended to include any physical object upon which computer data can be recorded as well as all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices capable of performing logical, arithmetic, or storage functions, including desktop and laptop computers, mobile phones, tablets, server computers, game consoles, network hardware, hard disk drives, RAM, floppy disks, flash memory, CDs, DVDs, and other magnetic or optical storage media.

Internet Service Providers “ISP’s” or Electronic Service Providers “ESP’s” are commercial organizations that are in business to provide individuals and businesses access to the Internet. ISPs provide a range of functions for their customers including access to the Internet, web hosting, email, remote storage, and co-location of computers and other communications equipment. ISPs can offer a range of options in providing access to the Internet including telephone based dial-up, broadband based access via digital subscriber line (DSL) or cable television, dedicated circuits, or satellite based subscription. ISPs typically charge a fee based upon the type of connection and volume of data, called bandwidth, that the connection supports. Many ISPs assign each subscriber an account name – a user name or screen name, an “email address,” an email mailbox, and a personal password selected by the subscriber. By using a computer equipped with a telephone or cable modem, the subscriber can establish communication with an ISP over a telephone line or through a cable system, and can access the Internet by using his or her account name and personal password.

“Internet Protocol Address” or “IP address”: Every computer or device on the Internet is referenced by a unique Internet Protocol address the same way every telephone has a unique telephone number. An IP address is a series of numbers separated by periods; an example of an IP address is 192.168.10.102. Each time an individual accesses the Internet, the computer from which that individual initiates access is assigned an IP address. A central authority provides each ISP a limited block of IP addresses for use by that ISP’s customers or subscribers. Most ISPs employ dynamic IP addressing, that is they allocate any unused IP address at the time of initiation of an Internet session each time a customer or subscriber accesses the Internet. A dynamic IP address is reserved by an ISP to be shared among a group of computers over a period of time. The ISP logs the date, time and duration of the Internet session for each IP address and can identify the user of that IP address for such a session from these records. Typically, users who sporadically access the Internet via a dial-up modem will be assigned an IP address from a pool of IP addresses for the duration of each dial-up session. Once the session ends, the IP address is available for the next customer. On the other hand, some ISPs, including most cable providers, employ static IP addressing, that is a customer or subscriber’s computer is assigned one IP address that is used to identify each and every Internet session initiated through that computer. In other words, a static IP address is an IP address that does not change over a period of time and is typically assigned to a specific computer. A modem is an electronic device that allows one computer to communicate with another.

Social Media: In general, social media may be defined as websites and applications that enable users to create and share content or to participate in social networking.

IMEI: IMEI (International Mobile Equipment Identity) is a unique identification number that identifies mobile devices.

IMSI: An international mobile subscriber identity (IMSI) is a unique number, usually fifteen digits, associated with Global System for Mobile Communications (GSM) and Universal Mobile Telecommunications System (UMTS) network mobile phone users. The IMSI is a unique number identifying a GSM subscriber.

Cookie: A cookie is a small amount of data generated by a website and saved by your web browser. Its purpose is to remember information about you, similar to a preference file created by a software application. One purpose of a cookie is to save log in and password information for an account. It also serves the purpose of saving user preferences for a site, such as a search engine saving a search or a news website saving a certain font you prefer.

BACKGROUND OF AFFIANT

STATEMENT OF PROBABLE CAUSE REGARDING CRIME BEING INVESTIGATED – OR IF FOR FUGITIVE PURPOSES, EXISTENCE OF OUTSTANDING WARRANT – AND PC TO BELIEVE THE INSTAGRAM ACCOUNT LISTED IS AN ACCOUNT THAT COULD LEAD TO MATERIAL EVIDENCE OR A FUGITIVE MIXED WITH THE BELOW PARAGRAPHS

Your Affiant is aware from prior experience that nearly all user-initiated Instagram activity, including the posting of images, status updates, the sending of messages, etc., is associated with an Internet Protocol (IP) address. This IP address would assist your affiant in finding the geographic location from which any messages made by the subject were posted, to include if these messages are sent with a mobile device. Your Affiant is also aware mobile devices connected to a Instagram account can sometimes store location data associated with the device’s Instagram activity. Your Affiant believes obtaining the records requested in this affidavit will help identify from which mobile or wireless networks the subject, or anyone with access to his Instagram profile, is in fact accessing that profile. This information would help identify his current location, establish a pattern of movement while on the run, identify anyone he may be staying with or associating with, aid in his apprehension, and further the investigation named in this affidavit.

Your Affiant knows from information from other officers and experience that Instagram honors Pen Register/Trap and Trace Orders for a Instagram profile. Information the company could forward Your Affiant could include IP address logs, “message headers,” login activity, and location information associated with any device used to log into Instagram.com. Instagram can provide such information to Your Affiant via Your Affiant’s given email address on an as-needed basis, depending on the facts of a given case.

Your Affiant believes that message headers (NOT message content), all Internet Protocol (IP) address logs, last known locations, location histories, and the installation of a pen register and trap and trace device on the subject accounts will assist in locating the subject. The information requested in this affidavit is necessary and relevant to the investigation and will assist in locating the subject.

In the experience of Your Affiant, the message headers (NOT message content), all Internet Protocol (IP) address logs, last known locations, location histories, and the installation of a pen register and trap and trace device has yielded information in past investigations that is relevant and material to criminal/fugitive investigations. Such information included leads relating to the general location of the subject account holder, and the names of family members, associates and other individuals who can assist in the apprehension of the subject, or identities of anyone who may aid in the flight and/or harboring of the subject. Your Affiant further states that, based upon his training and experience, one method to identify associates is to obtain account information for messages made to and from the subject accounts and then conduct an investigation related to those names and addresses. Based upon the subscriber information, Your Affiant would then direct other investigators to monitor the addresses and determine if the subject is present or if the associates may lead investigators to the subject.

Your Affiant further advises the Court that the general geographic location of the subject derived from message headers (NOT message content), all Internet Protocol (IP) address logs, last known locations, and location histories can be used to corroborate the observations of surveillance agents. More specifically, surveillance agents can compare observations of the general area in which the subject accounts are accessed to determine if the subject is in the area.

**Description on How Instagram Works**

Instagram is owned and operated by Meta Platforms, Inc.and is a social media networking website that can be accessed at http://www.instagram.com. Instagram allows its users to establish accounts and use them to share written comments, photographs, videos, and other information with other Instagram users, and with the general public should they choose. Users can access Instagram through the internet or through applications on mobile smart phones, tablets, or computers.

Instagram requires users to provide basic contact information to Instagram, either during the registration process or thereafter. This information may include the user's full name, birth date, contact e-mail address, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Instagram also assigns a unique user ID generated by Instagram. A user ID is different than a username. An Instagram username is often refenced to as a "handle". Instagram users, usernames or handles, define their profile address and may be in any configuration. The username or handle does not have to relate to the user’s actual name. When an Instagram user refers to their handle on social media, including different social media platforms like Instagram, he or she will type "@" before their username/handle to designate that this is how other Instagram users can find them on the Instagram platform. Handles or usernames are searchable by other Instagram users as opposed to the unique user numerical ID created by Instagram at the time of the account creation. Unlike user numerical ID' s, handles or usernames can be changed during the existence of the same account.

Instagram users can select different levels of privacy for the communications and information associated with their Instagram accounts. By adjusting these privacy settings, an Instagram user can make information available only to themselves, to particular Instagram users, to all Instagram users, or to anyone with access to the Internet, including people who are not Instagram users. Instagram accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Instagram. Someone can have multiple Instagram accounts which have public and private handles.

Instagram users may join one or more groups or networks to collect and interact with other users who are members of the same group or network. An Instagram user can also connect directly with individual Instagram users by sending another user a "follow request". If the recipient of a " follow request" accepts the request or uses an account setting that automatically accepts all requests, then the two users will become linked for purposes of Instagram and can exchange communications or view information about each other. Using "Instagram Direct" allows users to send photos and videos to only a specific user or group of users. Each Instagram users account includes a list of accounts that the user "follows," a list of "followers" who see updates from the user, and a feed which provides updates from the accounts the user "follows", such as new photos, videos, or comments from those users. Instagram users can also comment on or "favorite" photos and videos of other users.

Instagram users can create profiles that include photographs, lists of personal interests, employment information, educational institution affiliation, residential information and other personal information. Instagram users can also post "status" updates about their whereabouts and actions, as well as links to videos and photographs. Instagram allows users to easily post the same pictures and videos to their other social networking accounts such as Facebook, Twitter, Tumblr, and Flickr.

Instagram users can upload an unlimited number of photographs and videos. Instagram encourages users to categorize and label their phots and videos with "hashtags" so that other users with similar interest can find them. Instagram also allows users to label their photos and videos with location tagging, or "geo-tagging" to show where the photos or videos were taken. For Instagram's purposes, a user's "photo print" includes all photos uploaded by the user that have not been deleted, as well as all photos uploaded by any user that have that particular user "tagged in them". In addition to Instagram storing digital photographs, each photo uploaded by a user contains metadata which is stored separately by Instagram. Metadata is defined by the Meriam-Webster Dictionary as, "data that provides information about other data". In particular, metadata associated with digital images and photographs, provides information on its file type, date and time the file as created or modified, the computer software utilized to create or modify the image, as well as the computer hardware used to create the digital image or photograph, including the device serial number, make, model, photographic settings and global positioning system (GPS) coordinates.

Instagram users can exchange private messages on Instagram with other users through "Instagram Direct." These messages, which are similar to SMS or iMessage mobile-to-mobile text messages, are sent to the recipient on Instagram. Meta Platforms, Inc., the parent company of Instagram, also stores copies of messages sent by the recipient, as well as other information. Instagram users can also post comments on the Instagram posts of other users or on their own posts; such comments are typically associated with a specific postings or item on the profile - referred to as comments or "favorites." These messages most often involve exchange of photographic images, GIFs, or video files but can include text words as well. Messages can include emoji's and Bitmojis. Just like with the SMS text messages and Facebook messenger messages, users can have threads with just one other user or can have threads with multiple users at the same time, akin to a mass email thread or group text message on mobile-to-mobile SMS or iMessage text messages.

Instagram retains "Neoprint" data regarding a user which can include the following information from the user's profile: profile contact information; feed information; status updates; links to videos, photographs, and other items; lists of those accounts the user follows, follower lists, including the Follower's Instagram user ID; groups and networks of which the user in a member, including the groups' , Instagram group ID; future and past postings; rejected "follower" requests; comments; tags; and information about the user's access and use of the Instagram applications.

Instagram also retains Internet Protocol ("IP") logs for a given users ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Instagram, including information about the type of action, the date and time of action, and the user ID and IP address associated with the action. For example, if a user views an Instagram profile, that users' IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

Social networking providers like Instagram typically retain additional information about their user's account, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account numbers). In some cases, Instagram users may communicate directly with the Instagram about issues relating to their account, such as technical problems, billing inquiries, or complaints from the other users. Social networking providers like Instagram typically retain records about such communications, including records of contacts between the users and the provider' s support services, as well records of any actions taken by the provider or user as a result of the communications.

**Your Affiant further advises this Court that the installation and use of a pen register and trap and trace device on the subject account will in no way allow the active, real-time monitoring of any content or conversation(s).**

1. IT IS REQUESTED that a pen register be installed by the internet service/social media provider on the subject accounts, to register subject accounts, to record message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories, for a period of sixty (60) days from the date the warrant is served upon Meta Platforms, Inc., or until such time as the investigation is completed, whichever comes first.
2. IT IS REQUESTED that the internet service/social media provider, pursuant to probable cause, shall provide, on an ongoing (**NOT real-time**) basis, the following information relating to the subject accounts: message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories, beginning from the date the warrant is served upon Meta Platforms, Inc., and continuing for the sixty (60) day time period, or until the investigation is completed, whichever comes first.
3. IT IS REQUESTED that the internet service/social media provider shall authorize and provide YOUR NAME HEREongoing (**NOT real-time**) access to the following information relating to the subject accounts: message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories related to the pen register/trap and trace device, some of which is only available to such authorized users, **sent to** YOUR NAME HERE **daily (once every 15 minutes) via the email address** YOUR EMAIL ADDRESS**, beginning from the date the warrant is served on Meta Platforms, Inc. and continuing for the sixty (60) day time period, or until the investigation is completed, whichever comes first.**
4. IT IS REQUESTED the internet service/social media provider furnish all physical location data, to include GPS if available, collected the provider for the user of the account, including any data collected by its location services via the user's mobile phone or other device, on a real-time or near-real time basis. The provider is required to provide any such data they collect, regardless of the time of day.
5. IT IS REQUESTED, pursuant to 18 U.S.C. § 2703, that the internet service/social media provider shall furnish to law enforcement information including message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories, unobtrusively and with minimum interference with the services that are accorded the persons whose transmissions are the subject of the pen register and trap and trace device.
6. IT IS REQUESTED, pursuant to Crim. P. 41 and §16-3-304(2), that this Court seal the affidavit and search warrant and court order for production of records until the filing of charges based on this law enforcement criminal investigation. The affidavit establishes grounds to believe that disclosure at this time of the affidavit and search warrant and court order for production of records would be contrary to the public interest. Such order for sealing does not apply to representatives of law enforcement agencies, and District Attorney’s Offices.
7. IT IS REQUESTED, so as not to disrupt this ongoing investigation, Your Affiant also requests that this Court order Meta Platforms, Inc.(parent company for Instagram) NOT to take adverse action against the subject accounts, such as disabling or terminating the accounts, because of this warrant.
8. IT IS REQUESTED, pursuant to 18 U.S.C. §3123(d) and 18 U.S.C. §2705(b)(1)-(5), and Crim. P. 41 and §16-3-304(2), that Meta Platforms, Inc.(parent company for Instagram) be ordered **NOT to disclose the existence of this search warrant and court order to the subscriber for a period of one year**, unless otherwise ordered by a court of competent jurisdiction. Based on the information set forth in this affidavit, notification of the warrant may have an adverse result, as defined in 18 USC §2705(b)(1)-(5), i.e., disclosure may endanger the life or physical safety of an individual; allow flight from prosecution; allow destruction of or tampering with evidence; allow intimidation of potential witnesses; and/or would otherwise seriously jeopardize an investigation or unduly delay a trial.

I believe the above facts to be true from official LAW ENFORCEMENT AGENGY records, conversations with fellow officers, personal observations and interviews. I am a YOUR TITLE with the LAW ENFORCEMENT AGENGY. I have been trained at the State, and local levels with regard to my duties. I am authorized by law to execute search warrants in the County of Larimer and State of Colorado.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

AFFIANT

This affidavit was sworn to and subscribed by telephone this DATE day of MONTH 20\*\* at \_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

JUDGE / MAGISTRATE

Case No.

COUNTY OF LARIMER ) IN THE COMBINED COURT

 ) SS

STATE OF COLORADO )

**SEARCH WARRANT AND EX PARTE COURT ORDER AUTHORIZING USE/INSTALLATION OF A PEN REGISTER AND TRAP AND TRACE DEVICE, GEOGRAPHICAL LOCATION INFORMATION, AND AUTHORIZING RELEASE OF SUBSCRIBER INFORMATION**

Before the Honorable \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Judge / Magistrate

The Court, upon review of an affidavit filed by YOUR NAME HERE which is incorporated by reference, in support of the issuance of this order, hereby orders the production of the following records, for which there is probable cause to believe are in the actual or constructive possession or control of the business entity known or described as:

**Meta Platforms, Inc.** (parent company for Instagram)(internet service/social media provider)

**1 Meta Way**

**Menlo Park, CA 94025**

**Served via Instagram Law Enforcement Portal at:**

**https://facebook.com/records**

This Court also finds that there is probable cause to issue this Search Warrant and also for an Ex Parte Order authorizing use/installation of a pen register and trap and trace device, and authorizing release of subscriber and/or location information pursuant to the provisions of 18 U.S.C. §2703 (Stored Communications), 18 U.S.C. §§3122 and 3123 (Pen Register and Trap and Trace), C.R.S. §16-3-301 (Search Warrant), §16-3-301.1 (Production of Records), §16-3-303.5 (Location Tracking), and Crim. P. 41 (Search Warrant), namely that this property is stolen or embezzled, or is designed or intended for use as a means of committing a criminal offense, or is or has been used as a means of committing a criminal offense, or the possession of which is illegal, or would be material evidence in a subsequent criminal prosecution in this state or another state or federal court, or the seizure of which is expressly required, authorized or permitted by any statute of this state or the United States, or which is kept, stored, maintained, transported, sold, dispensed, or possessed in violation of a statute of this state, under circumstances involving a serious threat to public safety or order or to public health, or which would aid in the detection of the whereabouts of or in the apprehension of a person for whom a lawful arrest warrant is outstanding.

IT IS ORDERED that the internet service/social media provider provide the following records, data, information and technical assistance:

The following records, data, or information for Instagram user identified by username(s): INSTAGRAM ID between the dates of DATE OF INTEREST through DATE OF INTEREST for evidence of the crimes CRIMINAL OFFENSE:

* All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Instagram passwords, Instagram security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;
* Additional Instagram accounts that were registered to the email address and/or phone number(s) utilized to establish the account;
* All Accounts associated by device or cookie: to include User ID, subscriber name, cellphone number and email address.
* All devices(s) used and otherwise associated with the subscriber’s account – ESN, ICCID, IMSI, IMEI and MAC address numbers and activation dates;
* All activity logs for the account and all other documents showing the user’s posts, stories and other Instagram activities;
* All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them and any associated metadata [camera make, model, capture date and time, capture latitude and longitude, etc.] and original sized image associated with those images and videos;
* All profile information; news feed information; status updates; links to videos, photographs, articles, and other items; notes; wall postings; friend lists, including past and present friends along with the associated friends’ Instagram user identification numbers; groups and networks of which the user is a member, including the groups’ Instagram identification number(s) and Instagram identification number(s) of all group or network members; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Instagram applications;
* All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending “Friend” requests;
* All “check ins” and any other location information, including location history data;
* All Future and Past “events” the user responded to;
* All IP logs and associated port IDs, including all records of the IP addresses that logged into the account;
* All records of the account’s usage of the “Like” and “Follow” features, including all Instagram posts and all non-Instagram webpages and content that the user has “liked” and/or “followed”;
* All records of the account’s usage of the “Share” feature, including all Instagram posts and all non-Instagram webpages and content that the user has “shared”;
* All information about the Instagram pages that the account is or was a “fan” of;
* All records of Instagram searches performed by the account;
* The types of service(s) utilized by the user, the length of service(s) (including start date), and the means and source of any payments associated with the service(s) (including any credit card or bank account number);
* All privacy settings and other account settings, including privacy settings for individual Instagram posts and activities, and all records showing which Instagram users have been blocked by the account;
* All records pertaining to communications between Instagram and any person regarding the user or the user’s Instagram account, including contacts with support services and records of actions taken.
* All records including all above listed information of any Facebook account linked to or associated to the listed Instagram account.

Pursuant to §16-3-301.1, C.R.S., a criminal investigator or peace officer is hereby authorized to serve this order during normal business hours of the above-named business entity, and to receive the records during normal business hours of the business entity. Service shall issue in the same manner as a summons in a civil action or by personal service on a manager or supervisor of the business entity or through any electronic or other means established and utilized by the business to receive service of process. This order must be served within 14 days after the date it is issued.

The business entity is ORDERED to produce the above described records to the affiant or his/her designee within thirty-five (35) days of service.

The records should be provided to:

YOUR NAME, BADGE NUMBER

LAW ENFORCEMENT AGENGY

YOUR ADDRESS

YOUR PHONE NUMBER

EMAIL

The business entity shall also provide a notarized attestation of accuracy that the records produced represent complete and accurate copies of all records identified in this order that are in the actual or constructive control of the business entity. If the business entity does not produce all records identified in this order, it shall identify the records not produced. Failure to comply with this order shall support a finding of contempt of court.

Upon receiving the records from the business entity, the peace officer named herein shall file a return and inventory with the court indicating the records that have been received and the date and time upon which the records were received. The peace officer named herein may also file the original of the attestation of accuracy with the court.

IT IS FURTHER ORDERED:

1. That a pen register be installed on the subject accounts by the internet service/social media provider, to register subject accounts, to record message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories, for a period of sixty (60) days from the date the warrant is served upon Meta Platforms, Inc. (hereinafter known as the “sixty (60) day time period”), or until such time as the investigation is completed, whichever comes first.
2. The internet service/social media provider, pursuant to probable cause, shall provide, on an ongoing (**NOT real-time**) basis, message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories relating to the subject accounts, beginning from the date the warrant is served on Meta Platforms, Inc., and continuing for the sixty (60) day time period, or until the investigation is completed, whichever comes first.
3. The internet service/social media provider shall authorize and provide YOUR NAME HERE ongoing (**NOT real-time**) access to the following information relating to the subject accounts: message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories related to the pen register/trap and trace device, some of which is only available to such authorized users, **sent to** YOUR NAME HERE **daily (once every 15 minutes) via the email address** YOUR EMAIL ADDRESS**, beginning from the date the warrant is served on Meta Platforms, Inc., and continuing for the sixty (60) day time period, or until the investigation is completed, whichever comes first.**
4. The internet service/social media provider shall provide all physical location data, to include GPS if available, collected the provider for the user of the account, including any data collected by its location services via the user's mobile phone or other device, on a real-time or near-real time basis. The provider is required to provide any such data they collect, regardless of the time of day.
5. The internet service/social media provider shall furnish law enforcement information including message headers (**NOT message content**), all Internet Protocol (IP) address logs, last known locations, and location histories, unobtrusively and with minimum interference with the services that are accorded the persons whose transmissions are the subject of the pen register and trap and trace device.
6. That this Search Warrant and Order and application be **SEALED** until the filing of charges based on this law enforcement criminal investigation, that the identity of any target(s) of the underlying criminal investigation may be redacted from any copy of this Order to be served on any service provider or other person. After charges are filed, disclosure of this Search Warrant and Order and application is governed by Crim. P. 55.1.
7. Meta Platforms, Inc.(parent company for Instagram) NOT take adverse action against the subject accounts, such as disabling or terminating the accounts, because of this warrant.
8. Pursuant to 18 U.S.C. §3123(d) and 18 U.S.C. §2705(b)(1)-(5), and Crim. P. 41 and §16-3-304(2), that Meta Platforms, Inc.(parent company for Instagram), **NOT disclose the existence of this search warrant and court order to the subscriber for a period of one year**, unless otherwise ordered by a court of competent jurisdiction, as notification of the warrant may have an adverse result, as defined in 18 USC §2705(b)(1)-(5), i.e., disclosure may endanger the life or physical safety of an individual; allow flight from prosecution; allow destruction of or tampering with evidence; allow intimidation of potential witnesses; and/or would otherwise seriously jeopardize an investigation or unduly delay a trial.

THE INFORMATION SO ORDERED in items 1-5 above is related to the active and ongoing criminal investigation by YOUR AGENCY and in accordance with 18 U.S.C. §2703, 18 U.S.C. §§3122 and 3123, and C.R.S. §16-3-301, the records and information requested are or have been used as a means of committing a criminal offense or would be material evidence in a subsequent criminal prosecution in this state, another state, or federal court; the seizure of which is expressly required, authorized, or permitted by statute; or that would aid in the detection of the whereabouts of or in the apprehension of a person for whom a lawful arrest order is outstanding.

Based upon the affidavit of the above-named Affiant, which is incorporated by reference, I am satisfied that there is probable cause to believe there is a legal basis and also legal authority for the issuance of this Search Warrant and Ex Parte Order. You are therefore authorized to execute this Search Warrant and Ex Parte Order according to these terms and as otherwise permitted by law.

Dated this **\_\_\_\_\_day of \_\_\_\_\_\_\_\_\_ 20\_\_**, at \_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

JUDGE / MAGISTRATE