

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

JAN 08 2020

STATE OF OKLAHOMA

RICK WARREN
COURT CLERK

01

IN THE MATTER OF THE SEARCH WARRANT
FOR THE T-MOBILE WIRELESS RECORDS OF
CELLULAR TELEPHONE NUMBER 405/600-4018

) Case No. SW-2020-29
)
)

AFFIDAVIT FOR SEARCH WARRANT

State of Oklahoma
County of OKLAHOMA

)
) ss

NOW COMES The State of Oklahoma, by and through Agent Meghan Bowman, an Agent with the Oklahoma State Bureau of Investigation, and being duly sworn upon oath, states as follows:

Your affiant is Meghan Bowman, a certified and commissioned peace officer in and for the state of Oklahoma. Your affiant is currently employed as a Special Agent for the Oklahoma State Bureau of Investigation. Your affiant has been in law enforcement for over 4 years, primarily working major crime related investigations. Your affiant's training and education has included a Bachelor's Degree in Accounting from the University of Oklahoma, the State of Oklahoma's Basic Peace Officer Academy, and the OSBI Agent's Academy. Your affiant is aware of what probable cause is required to request a search warrant.

Your affiant, on behalf of the Oklahoma State Bureau of Investigation, respectfully applies to this court for an Order requiring T-Mobile to furnish to your affiant the following information concerning T-Mobile account 405/600-4018:

Any and all call detail records from September 1, 2011 through October 31, 2011, but not limited to:

- a) Any and all stored communications or files
- b) Call detail records, including push-to-talk, attempted and direct connected call detail records (including, but not limited to: incoming and outgoing call

- information of phone numbers, call duration, and voip detail including ip address)
- c) Incoming and outgoing SMS, MMS, or any other text messaging detail including phone numbers, content, pictures, videos, and subscriber assigned contact name if available
 - d) T-Mobile Cloud content, to include text messages, videos, pictures including those that are sexual in nature, contact list, calendar, downloads from the internet, etc.
 - e) IP address history
 - f) Cell site tower and sector hits
 - g) All available subscriber information
 - h) Device IMEI and serial number
 - i) Any account registration information provided by user at account initiation and retained by T-Mobile, to include information received prior September 1, 2011 and currently retained

Your affiant further requests this court to order T-Mobile to provide any technical assistance requested by your affiant, DIANE HOGUE, an Analyst with the Oklahoma State Bureau of Investigation, or any other employee of the Oklahoma State Bureau of Investigation.

Your affiant further states that the above described property may be found and is now being kept, possessed, or concealed at the following location:

T-Mobile Legal Compliance
ATTN: GAVIN PINCHBACK, Director, Law Enforcement Relations Group
4 Sylvan Way
Parsippany, New Jersey 07054
Phone: 866/537-0911
Fax: 973/292-8697

Further, your affiant states, in support of this application and for showing that there is probable cause for the issuance of a search warrant; and that the requested records and information are relevant and material to an ongoing criminal investigation, as follows:

On October 13, 2011, the body of CARINA SAUNDERS was found behind a homeland store in Bethany, Oklahoma County, Oklahoma. Her death was ruled a homicide by the Oklahoma Medical Examiner's Office.

In April of 2013, the Oklahoma State Bureau of Investigation was requested to investigate the death. On January 30, 2019, your affiant was assigned the case. Your affiant reviewed the materials in the case, performed interviews, and investigative activities.

On June 3, 2016, OSBI Special Agent JIM ELY interviewed KATHRYN BLOODWORTH. BLOODWORTH was SAUNDERS relative. SAUNDERS lived with BLOODWORTH during September of 2011. SAUNDERS used BLOODWORTH'S cellular telephone to communicate with SAUNDERS' friends during September until SAUNDERS left BLOODWORTH'S home on September 28, 2011. BLOODWORTH did not have contact with SAUNDERS after leaving her home.

On October 9, 2011, BLOODWORTH received text messages from a guy named SAVAGE. During the conversation, SAVAGE stated, "I'm going to bury you next to Carina." BLOODWORTH became concerned that something had happened to SAUNDERS. On October 10, 2011, BLOODWORTH and SAUNDERS' mother, MARJORIE QUEEN, made a missing persons report to the Oklahoma City Police Department.

On November 7, 2019, Your Affiant watched the interview of RC REID and Bethany Police Department Detectives. REID admitted to receiving a call from SAUNDERS after she had been reported missing. SAUNDERS used a blocked phone number to call REID. SAUNDERS stated she was fine and was hanging with some people. When REID asked who, SAUNDERS said she had to go and hung up the phone.

REID'S telephone number was 405/600-4018. Through law enforcement tools, your Affiant learned 405/600-4018 was a T-Mobile phone number.

THAT, the statements in this Affidavit are based on information obtained from REID and related investigative activities. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, fruits, and instrumentalities of the violation of Murder, Oklahoma Statute Title 21 Section 1114.

Based on my training and experience, I know that pictures and video files can remain indefinitely on digital storage devices or in online "cloud" storage accounts until deleted or overwritten. I also know a suspect may try to conceal criminal evidence, and he or she might store criminal evidence 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 on volume of data stored.

WHEREFORE, your affiant asks that a search warrant be issued according to law directed to any Sheriff, Police Officer, OSBI Agent, or law enforcement officer in Oklahoma County, Oklahoma, commanding that he or she search the property/account identified hereon, and detain the same as provided by law, and make written return

thereof according to law, and that T-Mobile make all listed items available to said officers.

FURTHER AFFIANT SAYETH NOT.

Meghan Bruman
Affiant

SUBSCRIBED AND SWORN to before me this 8th day of Nov, 2015

At 11 hours,

[Signature]
Judge of the District Court