

UNITED STATES DISTRICT COURT

EASTERN

DISTRICT OF

NORTH CAROLINA

FILED

JUL 27 2009

BY DENNIS P. IAVARONE, CLERK  
US DISTRICT COURT, EDNC  
DEP CLK

In the Matter of the Search of  
(Name, address or brief description of person, property or premises to be

APPLICATION AND AFFIDAVIT  
FOR SEARCH WARRANT

Hysen Sherifi, et al  
1320 E Steinbeck Drive, Raleigh, NC

Case Number: 5:09-mj-1622

I, Michael A. Greer being duly sworn depose and say:

I am a Special Agent of the Federal Bureau of Investigation and have reason to believe  
Official Title

that  on the person of or  on the property or premises known as (name, description and/or location)

As described in Attachment A.

in the Eastern District of North Carolina

there is now concealed a certain person or property, namely (describe the person or property to be seized)

Items described in Attachment B.

which is (state one or more bases for search and seizure set forth under Rule 41(b) of the Federal Rules of Criminal Procedure)

Evidence of a crime

concerning a violation of Title 18 United States code, Section(s) 2339A, 956(a), 924(c)

The facts to support a finding of probable cause are as follows:

As described in attached affidavit.

Continued on the attached sheet and made a part hereof:

Yes  No

Michael A. Greer  
Signature of Affiant

Sworn to before me and subscribed in my presence,

25 July 2009  
Date

at

Raleigh, NC  
City and State

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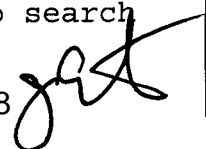
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT

I, MICHAEL A. GREER, being duly sworn depose, say, and provide the following information (obtained by me unless otherwise noted):

(1) I am a Special Agent with the Federal Bureau of Investigation (FBI) and was assigned to the Washington Field Office of the FBI from May, 1999 through September, 2005. In September, 2005, I was transferred to the Charlotte Division of the FBI and assigned to the Raleigh Resident Agency (RRA). As a Special Agent of the FBI, I am authorized to investigate crimes involving terrorism, computer fraud, wire fraud and conspiracies to commit those crimes. I have a Bachelor of Science Degree in Computer Information Systems, and approximately seven years of professional experience as a computer programmer in private industry. Additionally, I have received special training in the FBI relevant to the investigation of terrorism and computer related crimes.

(2) I am familiar with the information contained in this affidavit from information provided to me in the form of written and oral reports and discussions with other agents of the FBI, computer experts, and public source information available on the Internet.

(3) This affidavit is being made in support of an application for a search warrant granting authority to search



1 persons and places as set forth in detail on Attachment A and  
2 listed below:

3 a. 1320 E Steinbeck Drive, Raleigh, NC 27609, an  
4 apartment used at times as a residence by Mr. Hysen Sherifi.

5 (4) This affidavit also requests the authority to  
6 seize the items of evidence described in Attachment B of this  
7 application. The information contained in this affidavit is  
8 based on my knowledge, on information provided to me by  
9 witnesses, by law enforcement officials, and on documents I  
10 have reviewed in connection with this investigation.

11 (5) Because the purpose of this affidavit is to set  
12 forth only the facts necessary to establish probable cause  
13 for the issuance of a search warrant, I have not described  
14 all of the relevant facts and circumstances of which I am  
15 aware. In addition, when I rely on statements made by  
16 others, such statements are set forth in part and in  
17 substance unless otherwise indicated.

18  
19 PROBABLE CAUSE

20 (6) Since 2005, the FBI has been conducting an on-  
21 going Counterterrorism Investigation of Daniel Patrick Boyd,  
22 a.k.a. Saifullah, and others who have shown over time to  
23 follow and promote radical Islamic ideology and have  
24 knowingly, willfully, and unlawfully conspired to provide  
25 material support and resources in violation of Title 18  
26 U.S.C. Section 2339A, in preparation for and carrying out a  
27 violation of Title 18 U.S.C. Section 956(a), conspiracy to  
28 kill, kidnap, maim, or injure persons in a foreign country,

1 and 924(c), possession of firearms or ammunition in  
2 furtherance of a violent crime.

3 (7) During the on-going investigation, the FBI has  
4 employed several confidential human sources (CHS), conducted  
5 several types of surveillance, issued several Grand Jury  
6 Subpoenas and conducted several interviews of Daniel Patrick  
7 Boyd, his associates and other established sources.

8 (8) In 2005 an FBI CHS (CHS 1) witnessed Boyd  
9 encourage foreign-born Muslims to return to their home  
10 countries and fight jihad (holy war) against the oppressors  
11 of Islamic rule. Boyd requested that CHS 1 make copies of  
12 "Join the Caravan" written by Abdullah Azzam, and distribute  
13 them to "brothers" in the masjid (Note: "Join the Caravan"  
14 is a document that encourages jihad and deems it obligatory  
15 for all Muslims). Boyd related to CHS 1 that he met Azzam  
16 while living in Pakistan and fighting in Afghanistan in the  
17 late 1980s. Boyd also admitted to CHS 1 that he received  
18 training in the camps established by Usama Bin Laden during  
19 that time.

20 (9) In March 2006, CHS 1 was informed by a non-  
21 cooperating witness that Boyd traveled with one of his sons  
22 to Israel/Palestine in order to expose his son to "real  
23 Muslims" and to fight jihad.

24 (10) In June 2006, Boyd traveled again to Jordan  
25 and Israel/Palestine for what he told CHS 1 was to meet  
26 friends and "brothers."

27 (11) In October 2006, Ziyad Yaghi, a young Muslim  
28 from the Raleigh area who had befriended Boyd, traveled to

1 Jordan. Investigation revealed that during Yaghi's trip to  
2 Jordan he made several telephone calls to Boyd. (12) On  
3 October 21, 2006, the investigation began to reveal Boyd's  
4 systematic purchasing of firearms and ammunition. An  
5 established source revealed that Boyd purchased a Century  
6 Arms C91 Sporter, .308 rifle. On November 9, 2006, Boyd  
7 purchased a Bushmaster M4A3 5.56 assault rifle as well as a  
8 100 round magazine. On November 28, 2006, Boyd purchased a  
9 Ruger Ranch mini 14, 5.56 rifle. On February 13, 2007, Boyd  
10 purchased a CIA 7.62 x 39 rifle. On March 13, 2007, Boyd  
11 purchased a Ruger mini 14. On April 12, 2007 Boyd purchased  
12 a Springfield XD-45.

13 (13) In January 2007, physical surveillance  
14 observed Ziyad Yaghi, who returned from Jordan in December,  
15 2006, traveling to Boyd's residence, 134 Lakeside Circle,  
16 Willow Spring, North Carolina.

17 (14) In February 2007, Boyd purchased airline  
18 tickets for himself and two of his sons to travel to  
19 Israel/Palestine in June 2007.

20 (15) In March, 2007, physical surveillance observed  
21 Ziyad Yaghi and Mohammad Omar Hassan meeting with Boyd at a  
22 Durham, North Carolina masjid.

23 (16) Toll records for April 02, 2007 show 19 calls  
24 made by and between Yaghi, Hassan and Hollywood Travel.  
25 Shortly after the last call tickets were purchased for Yaghi  
26 and Hassan to travel to Israel. Boyd previously stated that  
27 he intended to travel to Jerusalem in June, 2007 to locate  
28 and support the mujihadin (Muslim fighters engaged in jihad)

1 and, if possible, fight jihad. Boyd further stated that his  
2 "kityeb," (Arabic for platoon) would travel separately to  
3 avoid detection and meet in Jerusalem.

4 (17) Sometime during the spring/summer of 2008  
5 Hysen Sherifi met Daniel Boyd and the two became friends.

6 (18) On May 9, 2008, physical surveillance observed  
7 Hysen Sherifi going to Daniel Boyd's halal grocery store, The  
8 Blackstone Market, 230 Forest Hills Drive, Garner, NC.

9 (19) On June 7, 2008, physical surveillance  
10 observed Hysen Sherifi drive his vehicle to two different  
11 Bank of America ATM machines and attempt to withdraw money.  
12 After the second Bank of America ATM stop, Sherifi drove to  
13 the Blackstone Market and met with Daniel Boyd. The two were  
14 observed talking and hugging. Grand Jury records for  
15 Sherifi's bank account indicate that he withdrew \$500 on June  
16 7, 2008. It is believed that Sherifi gave the \$500 to Boyd.

17 (20) On June 17, 2008, Hysen Sherifi told CHS 1  
18 that he gave money to Daniel Boyd for the "sake of Allah."  
19 CHS 1 took this to mean for the sake of jihad. On the same  
20 day CHS 1 observed Boyd demonstrate to Sherifi how to use a  
21 Kalishnikov Rifle (AK-47).

22 (21) On June 20, 2008, while in the Blackstone  
23 Market, Sherifi and another FBI CHS (CHS 2) observed Boyd put  
24 his finger to his lips signaling for CHS 2 to be quiet. At  
25 the same time Boyd held up a yellow sheet of paper with the  
26 words "Don't talk about anything you don't want them to hear.  
27 They are listening" written on it.

28 (22) On July 16, 2008, Sherifi asked CHS 1 for a

1 copy of "Join the Caravan."

2 (23) On July 28, 2008, CHS 1 rode with Daniel Boyd,  
3 Dylan Boyd and Sherifi to Washington, D.C., to visit Boyd's  
4 mother. En route, Sherifi explained he would be leaving for  
5 Kosovo the coming week, that he intended to stay there for  
6 two months, wait for an e-mail, then travel elsewhere. Based  
7 upon Sherifi's statement regarding waiting for an E-mail and  
8 traveling elsewhere the FBI believes that Sherifi's intent  
9 was to travel to Kosovo and stay there until he was told  
10 where to go fight jihad.

11 (24) On July 30, 2008, CHS 1 rode with Sherifi and  
12 his father to the airport for Sherifi's flight. Sherifi  
13 explained he planned to travel to Syria, Russia, and  
14 Chechnya. Sherifi's father was upset that he was going to  
15 Kosovo, and told CHS 1 that Sherifi got "crazy" when he  
16 became deeper in the religion.

17 (25) On September 11, 2008, Boyd told CHS 1 that he  
18 had heard from Sherifi in Kosovo, and that Sherifi had told  
19 him the "way to go is safe." Boyd said Sherifi is headed to  
20 Syria to meet with the Emirs, and Boyd had requested Sherifi  
21 ask the Emirs if they need men, or money, and that Boyd was  
22 ready to help.

23 (26) On November 3, 2008, Boyd told CHS 1 that he  
24 had heard from Sherifi and that Sherifi had requested Boyd  
25 tell all the brothers salaam, and this meant Sherifi was  
26 moving on. Boyd wished his son Zak were with Sherifi. Boyd  
27 then commented that something would happen here in America,  
28 by an American who knows the way of the American people.

1 (27) On January 30, 2009, Sherifi told another FBI  
2 CHS (CHS 3) in Kosovo that jihad is good and that if you  
3 can't commit jihad yourself you get the same benefit by  
4 supporting it with money or other actions.

5 (28) On February 7, 2009, Sherifi told CHS 3 that  
6 he was going to send CHS 3 more books on Islam and jihad and  
7 that one of the books was "44 Ways to Help the Mujihadin" by  
8 Anwar Aleki. Sherifi translated the book and put it on a  
9 website and he told CHS 3 that translating is one of the 44  
10 ways to help the Mujihadin.

11 (29) On February 11, 2009, Sherifi asked CHS 3 if  
12 he knew how to make bombs and then stated that he tried to  
13 learn from the Internet how to make bombs. On the same day  
14 Sherifi told CHS 3 he was working on translating Muslim  
15 documents from English to Albanian on his computer.

16 (30) On March 4, 2009, CHS 1 told Daniel Boyd that  
17 Hysen Sherifi contacted him and said that the brothers in  
18 Kosovo need money and men. Daniel Boyd replied to CHS 1 that  
19 it is difficult here now because they are watching everything  
20 that he does to include his family and friends' actions.  
21 Daniel Boyd explained how to open an account here and send  
22 Sherifi the debit card to draw out the money there.

23 (31) On March 31, 2009, CHS 1 told Daniel Boyd that  
24 Hysen Sherifi would be returning to the United States soon.  
25 Daniel Boyd told CHS 1 that it is good he is returning  
26 because they will be able to set up the bank account to help  
27 the mujihadin. Boyd continued to say that Sherifi could set  
28 up the account because the FBI are not watching him.



1 (32) On March 19, 2009, Sherifi called CHS 3 and  
2 told CHS 3 that he was going to the U.S. from Vienna and that  
3 he would be picked up by "the brother." Sherifi told CHS 3  
4 that it would be a good opportunity to meet the "brother" and  
5 the he would call and give CHS 3 a U.S. phone number once he  
6 got settled in.

7 (33) On April 5, 2009, physical surveillance  
8 observed Sherifi inside Dulles Airport in Dulles, Virginia  
9 after arriving from overseas. Sherifi left with Zak Boyd and  
10 CHS 1 and drove back to North Carolina. Upon his arrival in  
11 North Carolina Sherifi moved back into his parents home at  
12 7833 Foxwood Drive, Raleigh, NC 27615. Sherifi also began  
13 driving one of his family's vehicles, a 1995 Acura Integra,  
14 white, two door sedan, NC license tag RRE-5788, VIN  
15 JH4DC4364SS003411. Physical surveillance observed Sherifi in  
16 the White Acura on numerous occasions between April and July,  
17 2009, and it appeared to be his primary mode of  
18 transportation while in North Carolina.

19 (34) On April 8, 2009, CHS 1 picked up Sherifi and  
20 took him to an apartment at 1320 E Steinbeck Drive, Raleigh,  
21 NC. Sherifi got on the computer in the apartment and showed  
22 CHS 1 pictures of "Sadulleh" and "Rajab" (individuals Sherifi  
23 knows in Kosovo) and maps of Kosovo. Sherifi also told CHS 1  
24 about an Imam he knows from Kosovo who is currently in Egypt  
25 studying and will return to Kosovo in several months.

26 (35) On April 13, 2009, Daniel Boyd discussed with  
27 CHS 1 how to send money to Hysen Sherifi in Kosovo. Daniel  
28 Boyd told CHS 1 they have to be careful because if money is

1 put in the bank here and is taken out in Kosovo it would be a  
2 problem here. Daniel Boyd told CHS 1 that cash could be put  
3 into the account the old way, in an envelope at an ATM making  
4 sure to stay off camera.

5 (36) On April 23, 2009, CHS 1 met Sherifi at the  
6 apartment at 1320 E Steinbeck Drive, Raleigh, NC. When CHS 1  
7 arrived at the apartment Sherifi was on the computer.  
8 Sherifi and CHS 1 spoke about meeting Daniel Boyd and setting  
9 up a new bank account needed to get money to Kosovo. Sherifi  
10 told CHS 1 that he already had a Bank of America account.  
11 The conversation changed to the topic of Chechnya and Sherifi  
12 stated there was no easy way to get there. Sherifi said he  
13 knows a guy who is currently in Egypt that knows the way to  
14 Chechnya and that this individual would be returning to  
15 Kosovo for Ramadan.

16 (37) On April 25, 2009, Daniel Boyd and Zakariya  
17 Boyd removed multiple firearms from an armoire in the Boyds'  
18 house. The weapons were given to CHS 1, CHS 2, and Hysen  
19 Sherifi to handle. Daniel Boyd explained the names of each  
20 weapon and their caliber. Daniel Boyd told CHS 2 he was  
21 "trying to charge him up." Daniel Boyd told CHS 1 that they  
22 have to be careful about shooting these weapons because  
23 "they'll think we are making jihadi camp...we are." Daniel  
24 Boyd told them that they need to learn about these weapons  
25 first, then they can go one by one and shoot. Daniel Boyd  
26 told the group he wished he could go overseas but it is very  
27 hard to get there. Boyd continued to say jihad could be  
28 here.

1 (38) On April 25, 2009, Daniel Boyd told CHS 1 that  
2 there are two ready to go and that he had them covered.

3 (39) On April 26, 2009, CHS 2 traveled to Daniel  
4 Boyd's home. Daniel Boyd told CHS 2 that he and his family  
5 are leaving this year and asked CHS 2 to go with him. Daniel  
6 Boyd continued to tell CHS 2 that they may not make it  
7 overseas because it is so hard to get there. Boyd told CHS 2  
8 that maybe if they can't make it overseas they can all meet  
9 in D.C. and take out as many as they can.

10 (40) On April 29, 2009, CHS 1 spoke to Sherifi on  
11 the telephone and Sherifi told CHS 1 that he and Jasmin  
12 Smajic are getting food and heading to the apartment at 1320  
13 E Steinbeck Road, Raleigh, NC to spend the night.

14 (41) On May 1, 2009, Daniel Boyd told CHS 1 that  
15 Zakariya Boyd and Hysen Sherifi are the two guys ready to go.  
16 Daniel Boyd told CHS 1 that Sherifi will go to Kosovo first  
17 and Zakariya Boyd would follow two to three weeks later.  
18 Daniel Boyd continued to tell CHS 1 that if the kuffar (non-  
19 believers) will not let him leave he will go to Washington  
20 and shoot as many kuffar as he can.

21 (42) On May 6, 2009, CHS 1 met Sherifi and Smajic  
22 at the apartment at 1320 E Steinbeck Drive, Raleigh, NC.  
23 Sherifi spoke to CHS 1 about the money that a brother from  
24 the North Raleigh Masjid wanted to give to him. They then  
25 discussed how to get the money overseas. Smajic suggested  
26 buying gold jewelry here and then selling it there.

27 (43) On May 7, 2009, Daniel Boyd told CHS 1 that he  
28 was waiting confirmation as to where Zakariya Boyd and Hysen

1 Sherifi will go. Daniel Boyd told CHS 1 that he has not had  
2 contact yet.

3 (44) On May 16, 2009, Daniel Boyd told CHS 1 he has  
4 money in his home and when a brother goes he gives them money  
5 for the mujihadin.

6 (45) On May 17, 2009, CHS 1 received a telephone  
7 call from Sherifi's father. Sherifi's father told CHS 1 that  
8 Hysen Sherifi had been fighting with the entire family and he  
9 had left the house in his vehicle. Later that same day CHS 1  
10 received a telephone call from Hysen Sherifi. Sherifi told  
11 CHS 1 that he wanted nothing to do with his family and asked  
12 CHS 1 if he could stay at the apartment at 1320 E Steinbeck  
13 Drive, Raleigh, NC, until he returned to Kosovo. CHS 1 told  
14 Sherifi that he could stay at the apartment as long as he  
15 wanted. At this time Sherifi began living at the apartment  
16 at 1320 E Steinbeck Drive, Raleigh, NC. At the time of this  
17 writing, Sherifi's parents are believed to be out of the  
18 country and he concomitantly has not stayed at the apartment.

19 (46) On May 20, 2009, CHS 3 spoke with Sherifi on  
20 the telephone and Sherifi told CHS 3 that he is now living in  
21 an apartment in North Carolina (Note: the apartment Sherifi  
22 is referencing is the apartment at 1320 E Steinbeck Drive,  
23 Raleigh, NC). During this same conversation Sherifi told CHS  
24 3 that there is a brother in North Carolina who promised to  
25 give Sherifi \$20,000. That individual wanted Sherifi to let  
26 him know before he went back to Kosovo so he could give  
27 Sherifi the money. The \$20,000 is to be used to help the  
28 brothers in Kosovo.



1 (47) Through the end of May, 2009, Sherifi's first  
2 two weeks living in the apartment, there was not an  
3 indication such funds, weapons, or evidence of criminal  
4 activity might be found.

5 (48) On June 10, 2009, CHS 1, CHS 2, Boyd, Zak  
6 Boyd, Sherifi, and a minor son of Boyd's traveled to rural  
7 acreage in Caswell County, North Carolina and practiced  
8 military tactics and the use of weapons with Boyd's sniper  
9 and assault rifles and live ammunition. Boyd explained each  
10 weapon as they were demonstrated, noting its best use and  
11 where most commonly used.

12 (49) On June 18, 2009, CHS 3 spoke to Sherifi on  
13 the telephone and asked Sherifi if he had received the  
14 \$20,000 from the brother who promised it to him. Sherifi  
15 replied that he had not gotten the money yet and that the  
16 brother wanted him to use it for business. Sherifi then told  
17 CHS 3 that he would use the money for "Allah" and asked CHS 3  
18 if he gets what he means (The CHS believed this to be a  
19 reference to using the money for jihad).

20 (50) On July 7, 2009, CHS 1, CHS 2, Boyd, Zak Boyd,  
21 SHERIFI, and a minor daughter of Boyd's, returned to the  
22 Caswell County acreage for more training. In this session,  
23 they did some general shooting and weaponry training, then  
24 Boyd had the others do some "bounding." Bounding is a  
25 military maneuver in which a point man is placed to provide  
26 cover fire, as fellow soldiers "bound" forward to take his  
27 place and provide cover, in leap frog fashion. Again during  
28 this exercise, the defendants were using live ammunition.

1           (51) Hysen Sherifi is scheduled to fly back to  
2 Kosovo on July 30, 2009.

3           (52) In summary, based upon the aforementioned  
4 facts, it is reasonable to believe that Hysen Sherifi is  
5 involved in a conspiracy with others to provide material  
6 support to terrorists and to kill persons overseas. Sherifi  
7 has shown that he supports jihad through many activities  
8 including translating videos on his computer in Kosovo,  
9 attempting to raise money both in Kosovo and in the U.S., and  
10 by training with firearms. As evidenced by physical  
11 surveillance and interaction with FBI CHSs it is apparent  
12 that Hysen Sherifi has maintained an ongoing presence in the  
13 apartment at 1320 E Steinbeck Drive, Raleigh, NC and that  
14 there is at least one computer in that residence and that he  
15 has used that computer to communicate with and about the  
16 conspiracy.


17           (53) Based upon my training, experience and contact  
18 with FBI Special Agents experienced in international  
19 terrorism investigations, individuals who travel overseas and  
20 attempt to gain entry into such areas will create, maintain,  
21 and possess documents of their ideology, training, planning,  
22 objectives, associates, and communications and will keep this  
23 information in both written and electronic format.

24           (54) Sherifi moved into the apartment at 1320 E  
25 Steinbeck Drive, NC on May 17, 2009. Based on the foregoing,  
26 there is probable cause to believe that evidence will be  
27 found at 1320 E Steinbeck Drive, Raleigh, NC, regarding  
28 criminal violations of Title 18, U.S. Code 2339A, conspiracy

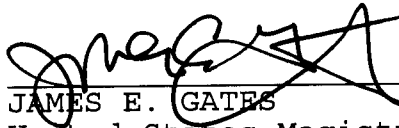
1 conspiracy to contribute material support to a terrorists,  
2 and Title 18, U.S. Code 956(a), conspiracy to kill, kidnap,  
3 maim, or injure persons, damage property in a foreign  
4 country, and 924(c), possession of firearms or ammunition in  
5 furtherance of a violent crime.

6 (55) Accordingly, Affiant respectfully requests  
7 that the Court issue a search warrant authorizing the search  
8 at 1320 E Steinbeck Drive, Raleigh, NC, for the documents,  
9 records and things more fully described in Attachment B.

10 (56) It is further requested that this Court issue  
11 an order pursuant to which this Application and the  
12 supporting Affidavit and documents related to the application  
13 for the Government be filed under seal. This information to  
14 be seized is relevant to an on-going, non-public  
15 investigation.

16  
17  
18  
19  
20   
21 Michael A. Greer  
22 Special Agent  
23 Federal Bureau of Investigation

24 Subscribed and sworn to before me this 25 day of July,  
25 2009.

26   
27 JAMES E. GATES  
28 United States Magistrate Judge

Attachment A

Description of location(s) to be searched:

1320 E Steinbeck Drive, Raleigh, NC 27609, is an apartment in the Tree Top Apartment complex on Steinbeck Drive. 1320 E is in a building inside the second entrance to the Tree Top Apartment complex and is located toward the end of the parking lot. 1320 E is an upstairs apartment and faces the front of the unit.

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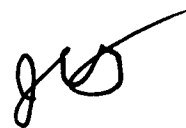


**ATTACHMENT B**  
**DESCRIPTION OF ITEMS TO BE SEIZED**

Based on the facts as recited in the attached affidavit, your Affiant has probable cause to believe that the following items containing or constituting evidence, fruits and instrumentalities of violations of Title 18, United States Code 2339A, 956(a), and 924(c), are at the location described in Attachment A.

Items sought to be seized include, but are not limited to the following, but seizure is permitted only to the extent such items constitute or contain evidence, fruits and instrumentalities of violations of the described crimes:

1. Any and all records, documents and materials. The term "records," "documents," and "materials" include all of the following items of evidence in whatever form and by whatever means such records, documents or materials, their drafts, or their modifications may have been created or stored, including, but not limited to, any handmade form (such as writing or drawing with any implement on any surface, directly or indirectly); any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, photocopies); any mechanical form (such as phonograph records, printing or typing); any electrical, electronic or magnetic form (such as tape recordings, cassettes, compact discs or any information on an electronic or magnetic storage device, such as floppy diskettes, hard drives, CD-ROMs, DVDs, optical discs, printer buffers, smart cards, memory calculators, electronic dialers, Bernoulli drives or electronic notebook, as well as printouts or readouts from any magnetic storage device).
  - a. Any and all past or present telephone books, Rolodex indices, calenders, telephone bills, appointment books, and other documents reflecting appointment and/or names, addresses and/or telephone numbers.
  - b. Any and all notes, markings, papers, paper scraps, partial documents, fax records, electronic mail, or other materials.
  - c. Identification documents, including but not limited to documents and other evidence that indicate ownership, occupancy, residency and associations.
  - d. Any and all financial and bank statements and records, money drafts, letters of credit, cashier's checks, safe deposit keys, statements of accounts, returned or cancelled checks, checkbooks and stubs, duplicates and copies of checks, deposit items, savings books, and passbooks, and similar bank and financial records.
2. Any computer, computer system and related peripherals; tapes, cassettes, cartridges, streaming tape, commercial software and hardware, computer disks, disk drives, modems, tape drives, disk application programs, data disks, system



disk operating systems, magnetic media floppy disks, hardware and software operating manuals, tape systems and hard drive and other computer related operation equipment, computer photographs, Graphic Interchange formats and/or photographs, undeveloped photographic film, slides, and other visual depictions of such Graphic Interchange formats (including, but not limited to, JPG, GIF, TIF, AVI, and MPEG), and any electronic data storage devices including, but not limited to hardware, software, diskettes, backup tapes, CD-ROMS, DVD, Flash memory devices, and other storage mediums; any input/output peripheral devices, including but not limited to passwords, data security devices and related documentation, and any hardware/software manuals

3. Any and all firearms, ammunition, explosives, explosive components and accessories, including but not limited to, hand guns, long guns, ammunition, ammunition containers, optics, magazines, and firearm accessories.
4. Any and all photographs, books, videos, and literature that advocates violent jihad, depicts potential co-conspirators or criminal associations, and depicts potential targets.
5. Currency.
6. Cellular telephones and SIM cards (cellular phone memory chip).

