



12/30/19

Assistant U.S. Attorney [REDACTED]
USAO
[REDACTED]
[REDACTED]

Re: Grand Jury Subpoena dated October 23, 2019 (Google Ref. No. 3011708)

Dear Assistant U.S. Attorney [REDACTED]:

Pursuant to the Grand Jury Subpoena issued in the above-referenced matter, we have conducted a diligent search for documents and information accessible on Google's systems that are responsive to your request. Our response is made in accordance with state and federal law, including the Electronic Communications Privacy Act. See 18 U.S.C. § 2701 et seq.

Accompanying this letter is responsive information to the extent reasonably accessible from our system associated with the Google account(s), [REDACTED], as specified in the Grand Jury Subpoena. We have also included a signed Certificate of Authenticity which includes a list of hash values that correspond to each file contained in the production. Google may not retain a copy of this production but does endeavor to keep a list of the files and their respective hash values. To the extent any document provided herein contains information exceeding the scope of your request, protected from disclosure or otherwise not subject to production, if at all, we have redacted such information or removed such data fields.

After a diligent search and reasonable inquiry, we have found no records for the sign-in phone number(s) [REDACTED]. The primary account identifier for most Google services is an email address, not a phone number.

Google objects and has not produced records associated with Google accounts for which you have not expressly provided an account identifier or which derive from records or other information of the subject account(s) that you seek to have Google search. Because this exceeds the scope of 18 U.S.C. § 2703(c)(2), Google requires a court order pursuant to 18 U.S.C. § 2703(d) based on specific and articulable facts showing that the account(s) linked by cookies or other identifiers is relevant and material to your investigation for the duration of the time period requested.

Please note that Google Pay service data is under the control of Google Payment Corporation. Any request for such data must be specifically addressed to Google Payment Corporation and can be served through the email address googlepayments@google.com.

For a Google Custodian of Records, we will require a subpoena and confirmation from you of the time and date of the appearance, the scope of testimony, any Google Reference



Number(s) associated with the case, and the travel for the appearance at least one week in advance in order to identify, make the appropriate plans for, and prepare a custodian for trial.

Finally, in accordance with Section 2706 of the Electronic Communications Privacy Act, Google may request reimbursement for reasonable costs incurred in processing your request.

Regards,

Jeremy Paduano
Google Legal Investigations Support



CERTIFICATE OF AUTHENTICITY

I hereby certify:

1. I am authorized to submit this affidavit on behalf of Google LLC ("Google"), located in Mountain View, California. I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.
2. I am qualified to authenticate the records because I am familiar with how the records were created, managed, stored and retrieved.
3. Google provides Internet-based services.
4. Attached is a true and correct copy of records pertaining to the Google account-holder(s) identified with account(s), [REDACTED] with Google Ref. No. 3011708 ("Document"). Accompanying this Certificate of Authenticity as Attachment A is a list of hash values corresponding to each file produced in response to the Grand Jury Subpoena.
5. The Document is a record made and retained by Google. Google servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted by the user, and this data is kept in the course of this regularly conducted activity and was made by regularly conducted activity as a regular practice of Google.
6. The Document is a true duplicate of original records that were generated by Google's electronic process or system that produces an accurate result. The accuracy of Google's electronic process and system is regularly verified by Google.
7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

_____/s_ Jeremy Paduano _____
(Signature of Records Custodian)

Date: 12/30/19

Jeremy Paduano
(Name of Records Custodian)



Attachment A: Hash Values for Production Files (Google Ref. No. 3011708)

[REDACTED].AccountInfo.txt:

MD5- 2f1935f54b7c8b246547d566c1d3ed3a

SHA512-

14ef72f03645d4ed8f52eed5ef5a8a4bc0d464c19fd843faa505c3b2eee08d0ad87e0bb37aba78b74e

d3d70b0249421c4913a8fee11b32418eb8b70a853f5602

[REDACTED].AccountInfo.txt:

MD5- b87e49d0e75a092a869179c2114fedc9

SHA512-

2df27e030822f30365c6f8fb4010e933f609abe8a01cdde09e73a2800939a49a8e8cb2474a7ba0c2f5

ed2638efe0a6ccfe3b8339c29848914d891fed83c21277