

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

**UNDER SEAL**

In the Matter of the Search of:

Case Number:

18M795

A collection of computer servers located within the offices at 121 North LaSalle Street, Room 302, Chicago, Illinois, further described in Attachment A

**SEARCH AND SEIZURE WARRANT**

To: Steven Noldin and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

**See Attachment A**

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

**See Attachment B**

**YOU ARE HEREBY COMMANDED** to execute this warrant on or before December 25, 2018 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

Date and time issued: December 11, 2018

  
\_\_\_\_\_  
*Judge's signature*

City and State: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

**Return**

Case No:	Date and Time Warrant Executed:	Copy of Warrant and Inventory Left With:
18M795	12/13/2018 3:25 P.M.	MARLA KAIDEN

Inventory made in the presence of:  
MARLA KAIDEN

Inventory of the property taken and name of any person(s) seized:  
  
SEE ATTACHED.

*Sh*

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

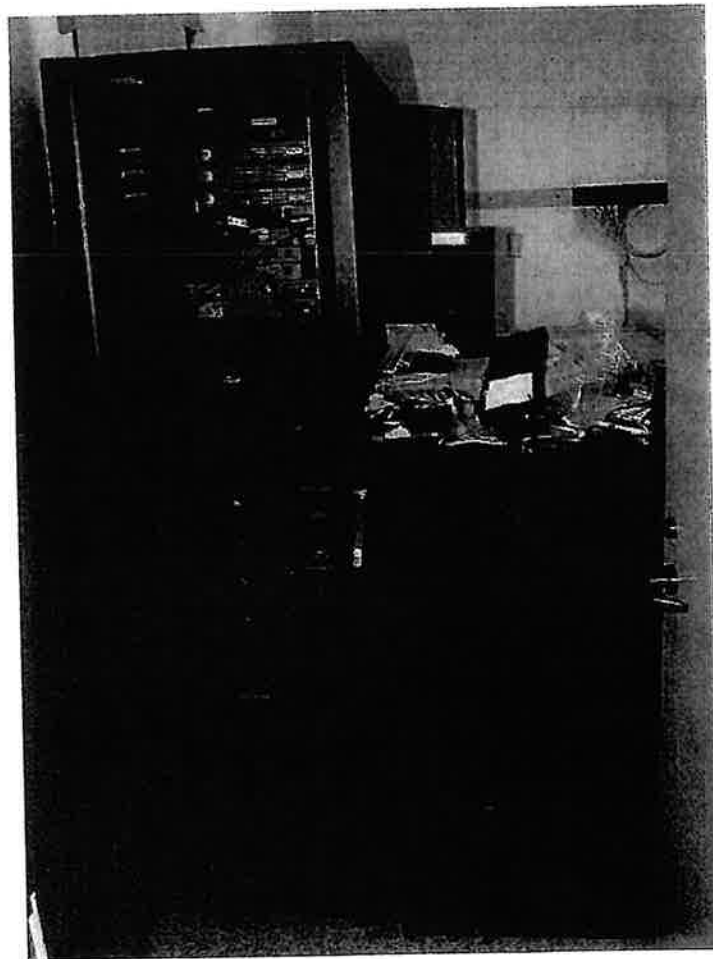
\_\_\_\_\_  
*Executing officer's signature*

\_\_\_\_\_  
*Printed name and title*

## ATTACHMENT A

### Description of Premises to Be Searched

The **Subject Servers** are a collection of rack-mounted servers, or rack servers, that are approximately four to five feet tall. The **Subject Servers** include both towers depicted in the photograph below as well as any surrounding computer hardware capable of storing computer information. A photograph of the **Subject Servers** appears below.



## ATTACHMENT B

### Items To Be Seized

Evidence, instrumentalities and fruits concerning violations of Title 18, United States Code, Sections 666, 1343, 1349, 1951, 1952, and 371, as follows:<sup>1</sup>

1. Any and all documents and communications referencing or concerning Individual A, Entity A, Entity B, Entity C, and Entity D, including but not limited to any and all communications (i) with Entity E, Entity F, Entity G, and Entity H, or their personnel about Entity B; (ii) any requests for assistance made by Individual A, Entity A, or on their behalf; and (iii) any benefits provided by Individual A, Entity A, or by others acting on their behalf, to EDWARD M. BURKE.
2. Any and all documents and communications referencing or concerning Individual D, Individual E, and Entity I, including but not limited to any and all communications: (i) with Entity H, Entity I, or their personnel about Entity J; (ii) any requests for assistance made by Individual D or by Individual E on Individual D's behalf; and (iii) any benefits provided by Individual D, Entity J, or by others acting on their behalf, to EDWARD M. BURKE.
3. Any and all documents and communications referencing or concerning Entity K, including but not limited to any and all communications: (i) concerning Individual F's potential association or employment with Entity K; (ii) concerning Entity K's operations and planned activity; and (iii) any benefits provided by Entity K, or by others acting on its behalf, to EDWARD M. BURKE or EDWARD M. BURKE's associates, including Individual F.
4. Any and all documents and communications referencing or concerning Individual G, Individual H, Entity L, Entity M, and any location commonly referred to as Entity N, including but not limited to any and all communications: (i) with Individual H, Individual I, Entity L, Entity M,

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<sup>1</sup> The individuals and entities anonymized herein are identified in paragraphs 165 and 167 of the November 21, 2018 Affidavit that is attached to the affidavit in support of this search warrant. Specifically, paragraph 165 contains a non-anonymized version of Attachment B, and paragraph 167 contains a key identifying each of the individuals and entities set forth herein. All law enforcement officers executing this warrant shall be provided with a copy of the text of these paragraphs prior to executing this warrant.

or their personnel and their affiliated companies about any location commonly referred to as Entity N; (ii) any requests for assistance made by Individual G, Individual H, Entity L, Entity M or by other individuals and entities on their behalf; and (iii) any benefits provided by Individual G, Individual H, Entity L, Entity M, or their personnel and their affiliated companies, or by others acting on their behalf, to EDWARD M. BURKE or Individual C.

5. Any and all documents and communications concerning EDWARD M. BURKE's efforts to obtain private gain for himself and others, including business for the law firm, Klafter & Burke, in exchange for or as a result of EDWARD M. BURKE taking or refraining from taking official action as an Alderman or as Chairman of the Chicago City Council's Committee on Finance.
6. Any and all documents and communications concerning EDWARD M. BURKE's efforts to obtain employment, patronage jobs or other benefits for his personal associates in exchange for or as a result of EDWARD M. BURKE taking or refraining from taking official action as an Alderman or as Chairman of the Chicago City Council's Committee on Finance.
7. Any and all documents and communications evidencing agreements to compensate any party for business or income realized by Klafter & Burke, or by any individual associated with the firm, including but not limited to EDWARD M. BURKE, including but not limited to agreements concerning referral fees, fee-splitting, fee-sharing, and consulting agreements, however styled or named.
8. Any and all documents and communications evidencing EDWARD M. BURKE's use of property and personnel of the City of Chicago to conduct or advance the business of his law firm, Klafter & Burke, and his private legal business.
9. Any and all documents and communications that identify the names, contact information, schedules and work location of the individuals who report to or work for EDWARD M. BURKE.
10. Any and all documents and communications concerning the names, addresses, telephone numbers, email addresses, and other contact or identification information of participants involved in the activities described in the above paragraphs.

11. Power cords, peripherals, and other items needed to operate any computers and servers removed from the premises pursuant to the procedures specified in the Addendum.

## ADDENDUM TO ATTACHMENT B

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

The government will return any electronic storage media removed from the premises described in Attachment A within 10 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.