# AFFIDAVIT OF SPECIAL AGENT KEVIN R. GAUL IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Kevin R. Gaul, state:

## INTRODUCTION AND AGENT BACKGROUND

- 1. I am currently employed as a Special Agent with the United States Environmental Protection Agency, Criminal Investigation Division (EPA-CID). I have worked in EPA-CID's Boston Area Office for approximately ten years. I have worked as a federal law enforcement officer for over twenty-four years, and during this time I have conducted numerous complex, multijurisdictional federal and state criminal and civil investigations involving a variety of matters. I have been extensively trained in various aspects of criminal investigation and have participated in the successful prosecutions of individuals and companies that have violated the criminal laws of the United States.
- 2. As a Special Agent of EPA-CID, I investigate criminal violations of the environmental statutes administered by the EPA, including the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136, et seq., as well as violations of Title 18 of the United States Code. I am duly authorized by 18 U.S.C. § 3063 to carry firearms, to execute and serve any warrant or other process issued under the authority of the United States, and to make arrests without warrant for any offense committed in my presence or any felony offense for which I have probable cause to believe that the person to be arrested has committed or is committing.
- 3. I am currently investigating Jiule Lin for the importation, distribution, and sale of unregistered pesticides falsely marketed as personal protection against viruses, in violation of FIFRA, 7 U.S.C. §§ 136j(a)(1)(A), 136j(a)(1)(E), and 136l(b)(1)(B), and of the criminal prohibitions against importation contrary to law, 18 U.S.C. § 545; mailing injurious articles, 18

U.S.C. § 1716; mail fraud, 18 U.S.C. §1341; wire fraud, 18 U.S.C. § 1343; and conspiracy to commit such offenses, 18 U.S.C. §§ 371 and 1349.

- 4. This affidavit is being submitted in support of an application for a warrant, under 18 U.S.C. § 2703(a) and Rule 41 of the Federal Rules of Criminal Procedure, to search and seize the eBay, Inc. ("eBay") account identified by the user name "dealslyn2018" and other data associated with this account, as described in Attachment A. There is probable cause to believe that the dealslyn2018 eBay account contains fruits, evidence, and instrumentalities of the crimes listed in paragraph 2, as described in Attachment B.
- 5. The dealslyn2018 eBay account and relevant data is maintained by eBay, which accepts service of process at 2025 Hamilton Avenue in San Jose, California and via its online law enforcement portal at https://le.corp.ebay.com/LEPortal\_CommunitiesLogin.
- 6. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit includes only those facts I believe are necessary to establish probable cause and does not include all of the facts uncovered during the investigation.

#### STATUTORY AND REGULATORY BACKGROUND

7. The Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA") regulates the production, sale, distribution, and use of pesticides in the United States. A "pesticide" is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. 7 U.S.C. § 136(u); 40 C.F.R. § 152.3. An "antimicrobial pesticide" is defined as a pesticide that is intended to disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms, or to protect inanimate objects or surfaces from contamination caused by bacteria, viruses, and other microbes. 7 U.S.C. § 136(mm). The term "pest" is

broadly defined to include, among other things, viruses, bacteria, or other microorganisms, except viruses on or in living humans. 7 U.S.C. § 136(t); 40 C.F.R. § 152.5(d).

- 8. FIFRA requires that all pesticides be registered with the EPA before they can be sold or distributed in the United States. 7 U.S.C. § 136a(a). The registration process is detailed, and applicants are required to submit a substantial amount of information to the EPA in support of a request for registration. Information that must be submitted in support of an application to register a pesticide includes the complete formula of each pesticide for which registration is sought, including the identity of its active and inert ingredients, all proposed labeling for the pesticide, and a statement of all pesticidal claims to be made for the pesticide. *See* 7 U.S.C. § 136a(c); 40 C.F.R. § 158.155.
- 9. Antimicrobial pesticides are subject to specific data requirements in order to be registered by the EPA. *See* 40 C.F.R. Part 158, Subpart W. All antimicrobial pesticide applicants for registration must ensure through testing that their product is efficacious when used in accordance with label directions and commonly accepted pest control practices. 40 C.F.R. 158.2220(a)(1). An antimicrobial pesticide that makes "public health claims" must be supported by additional product performance data required by the EPA as part of the application for registration. 40 C.F.R. 158.2220(a)(2). An antimicrobial pesticide product is considered to make a "public health claim" if the product bears a claim to control pest microorganisms that pose a threat to human health and whose presence cannot be readily observed by the user. 40 C.F.R. 158.2204(a).
- 10. Registered pesticides are given a product registration number beginning with the phrase "EPA Reg. No." 40 C.F.R. §§ 156.10(e). Pesticide-producing establishments also receive an establishment registration number designated by the phrase "EPA Est." 40 C.F.R. §§

- 156.10(f). As a condition of registration, all registered pesticides must have a label that bears both the product registration and establishment numbers. 40 C.F.R. § 156.10(a). This label also must contain several other pieces of information, such as the directions for use of the pesticide, 40 C.F.R. § 156.10(i); child hazard warnings, 40 C.F.R. § 156.66; a first aid statement, 40 C.F.R. § 156.68; precautionary statements for humans and domestic animals, 40 C.F.R. § 156.70; and environmental hazard and precautionary statements, 40 C.F.R. §§ 156.80 and 156.85. Proposed labels must be submitted to the EPA along with the application for registration. 40 C.F.R. § 152.50(e); 7 U.S.C. §§ 136a(c)(1)(C) and 136a(c)(5)(B).
- 11. The EPA maintains an online Pesticide Product and Label System containing a collection of pesticide product labels that have been accepted by the EPA under FIFRA. *See* https://iaspub.epa.gov/apex/pesticides/f?p=PPLS:1.
- 12. It is unlawful for any person in any state to distribute or sell to any other person a pesticide that has not been registered under FIFRA. 7 U.S.C. § 136j(a)(1)(A). FIFRA defines "distribute or sell" to include not only actual sale or distribution of a pesticide but also the act of offering a pesticide for sale. 7 U.S.C. § 136(gg); 40 C.F.R. § 152.3.
- 13. It is also unlawful for any person to sell or distribute to any other person a pesticide that is "misbranded." 7 U.S.C. § 136j(a)(1)(E). A pesticide is "misbranded" under FIFRA if, *inter alia*, its container does not have a label bearing the pesticide's registration number or one with labeling that bears any statement, design, or graphic representation relative to the pesticide or its ingredients which is false or misleading. 7 U.S.C. § 136(q)(1)(A).
- 14. Under FIFRA, it is a misdemeanor criminal offense to knowingly violate any provision of the statute. 7 U.S.C. § 136l(b)(1)(B).

- 15. Under 18 U.S.C. § 545, it is a federal crime to fraudulently or knowingly import or bring into the United States any merchandise contrary to law, or to receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law. This includes the importation of a pesticide not registered with the EPA.
- 16. Under 18 U.S.C. § 1716, it is a federal crime to mail poison, hazardous materials, and all other natural or artificial articles, compositions, or material which may kill or injure another, or injure the mails or other property.

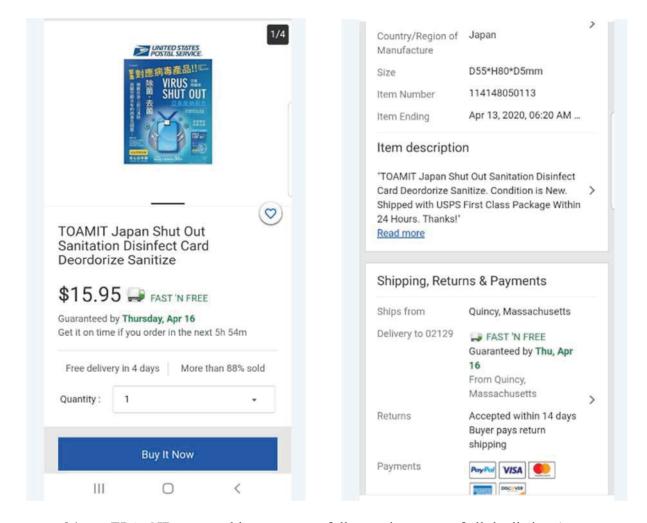
#### **EBAY**

- 17. eBay Incorporated, or eBay.com, is a global internet-based marketplace accessible at the website www.ebay.com or via an application that can be installed on computer equipment, including a tablet or a cell phone. eBay allows users to create accounts through which they may list items for sale and/or peruse listings of items for sale created by other users. eBay's marketplace also serves as a platform through which sellers and buyers can complete transactions for items listed for sale. The headquarters of eBay is located at 2025 Hamilton Avenue in San Jose, California.
- 18. eBay users, including sellers and buyers, can also send private messages to each other. These messages are only viewable by the sender, recipient, and/or eBay.
- 19. Based on my knowledge and understanding of eBay's marketplace, as well as through information obtained during the course of this investigation, sellers and buyers on eBay oftentimes exchange messages prior to and after an item is sold by the seller to the buyer.

#### PROBABLE CAUSE TO BELIEVE THAT A FEDERAL CRIME WAS COMMITTED

- 20. EPA-CID has become aware of instances around the country in which sellers using online marketplaces such as eBay are marketing and selling unregistered pesticide products or pesticidal devices that claim to offer protection against viruses, including SARS-CoV-2, the virus responsible for COVID-19.
- 21. On or about April 1, 2020, I began investigating allegations of the illegal sale of unregistered pesticide products that claim to control viruses and bacteria. I have researched listings on eBay, and I have spoken with and gathered information from agents in other EPA-CID offices who are conducting investigations involving the sale of certain "Virus Shut Out" products, as well as with an Inspector with the United States Postal Inspection Service. I am currently investigating allegations that a male subject named Jiule Lin ("LIN") has marketed and sold a product called "TOAMIT Virus Shut Out" via eBay.com.
- 22. On or about April 9, 2020, I began to investigate an eBay user identified as "dealslyn2018". I observed that eBay seller "dealslyn2018" had posted for sale a product called "TOAMIT Virus Shut Out." The eBay listing for the item stated, "TOAMIT JAPAN VIRUS SHUT OUT SANITATION DISINFECT CARD DEORDORIZE [sic] SANITIZE" product(s) item # 114148050113 imported from Japan." I also observed numerous photographs on this eBay listing of the TOAMIT Virus Shut Out items for sale. The eBay listing's "Item Description" included, "TOAMIT Japan Virus Shut Out Sanitation Disinfect Card Sanitize Disinfect Card Deodorize [sic] Sanitize. Condition is New. Shipped with USPS First Class Package Within 24 hours. Thanks!" The listing included photographs of a superimposed United States Postal Service logo atop the TOAMIT Virus Shut Out items pictured for sale. The listing indicated that shipments of the item(s) originated from Quincy, Massachusetts, and that sixteen

- (16) of these items had previously been sold.
- 23. The EPA initially captured certain images from dealslyn2018's eBay listing pages, including these images:



- 24. EPA-CID was unable to secure a full record account of all the listings' information and details because, within approximately one hour of EPA's discovery of the subject listing, eBay removed the listing from public view on the website. The disabled link to the former listing was replaced with a message reading, "This listing (114148050113) has been removed, or this item is no longer available."
- 25. I have learned that there have been other listings for products called "TOAMIT Virus Shut Out" offered for sale on eBay by a seller in Georgia and that the listings had included

claims that the product would protect the buyer or wearer of the product from viruses or bacteria, stating that the product's main ingredient was Cl02 (chlorine dioxide), and showing photographs depicting the removal of bacteria, germs, and viruses through the wearing of "TOAMIT Virus Shut Out." I learned that in connection with an investigation of that eBay seller, EPA-CID obtained evidence that a package containing "TOAMIT Virus Shut Out" products had arrived at John F. Kennedy Airport in New York before being forwarded to Georgia and on which all labeling and printing appeared only in Japanese. <sup>1</sup>

- 26. "TOAMIT Virus Shut Out" by its name makes the claim that it controls, mitigates, repels, or protects against pests, including viruses. It therefore is a pesticide as defined and regulated by FIFRA, and as such it must be registered with the EPA before it can be offered for sale, sold, or distributed in the United States.
- 27. "TOAMIT Virus Shut Out" is not registered with the EPA in accordance with FIFRA. It cannot legally be imported into the United States and may not legally be sold or distributed within the United States.
- 28. On April 9, 2020, I contacted eBay and obtained certain identity information for the eBay user "dealslyn2018." My investigation determined that eBay username dealslyn2018 has been assigned to an individual named Jiule LIN since September 14, 2017, with a contact and shipping address of 53 Hamilton Street, Quincy, Massachusetts 02170-2306. The current cellular telephone number associated with the dealslyn2018 account is \_\_\_\_\_\_\_-0836. eBay records further indicate that LIN has been an eBay user under a variety of usernames since October 2007.

<sup>&</sup>lt;sup>1</sup> EPA-CID is continuing its investigation with respect to the actual origin of these products.

- 29. According to records obtained from eBay, the transaction history associated with LIN's account indicates that the TOAMIT Virus Shut Out products were listed for sale on March 12, 2020 and March 13, 2020. Between March 12, 2020 and April 10, 2020, approximately 102 TOAMIT Virus Shut Out products were marketed and/or offered for sale via LIN's eBay account. The eBay numbers associated with the listings for these products were 114148050113 and 114147509220, and they were listed as "TOAMIT Japan Virus Shut Out Sanitation Disinfect Card Deodorize [sic] Sanitize" and "TOAMIT Japan Virus Shut Out Sanitation Disinfect Card Sanitize," respectively.
- 31. Comcast, the internet service provider for that address, has confirmed that the IP address .239 was assigned to Comcast subscriber Jiule LIN at the physical address 53 Hamilton Street in Quincy, Massachusetts during the time period of March 11, 2020 through March 14, 2020.<sup>2</sup>
- 32. Buyers in New York, Florida, Ohio, Illinois, and California purchased TOAMIT Virus Shut Out via the dealslyn2018 listings for \$15.95, \$16.95, or \$19.95 per unit. From the information currently available, it appears that eighteen total devices were sold via the dealslyn2018 listings between March 12, 2020 and April 10, 2020.

<sup>&</sup>lt;sup>2</sup> This IP address may have been assigned to the same subscriber at the same address during other periods of time; to date, EPA-CID has received IP address information only for the period from March 11, 2020 through March 14, 2020.

- 33. For each transaction, eBay's records include information about the sale, including the buyer's name, eBay user ID, and the address to which the product should be shipped. For several transactions, USPS was able to locate tracking numbers and images captured through mail processing for the packages. For example, on April 10, 2020, a purchase was made by the eBay user "nxlp," associated with an individual with the initials "S.W.," and a "ship to" location in Naperville, Illinois. A review of USPS records indicated that the package was shipped by USPS First Class mail with the tracking number 7892. A prepaid shipping label was affixed to the package listing the sender as "JIULE LIN 53 Hamilton St Quincy MA 02170-2306." According to USPS records, the package was processed through USPS's Boston Processing and Distribution Center on April 11, 2020 and delivered in Naperville, Illinois on April 13, 2020.
- 34. A review conducted by the United States Postal Inspection Service revealed that 53 Hamilton Street in Quincy, Massachusetts is a valid mailing address and that Jiule LIN receives mail at that address.
- 35. A search of the online records from the Assessor's Office of the City of Quincy,

  Massachusetts confirmed that LIN is the owner of a duplex located at 51 and 53 Hamilton Street

<sup>&</sup>lt;sup>3</sup> To protect the identity of the victim-buyer, the victim-buyer is identified by his or her initials, and redactions have been applied to the reproduction of the USPS shipping label.

<sup>&</sup>lt;sup>4</sup> Another package shipping label connected to a dealslyn2018 eBay sale, dated April 1, 2020, included a return address in Colchester, Connecticut. Though several addresses in Colchester, Connecticut appear to be, or have in the past been, associated with LIN, there is no known connection between LIN and the specific street address listed on the shipping label. Records from the Property Assessor for the City of Colchester indicate that the premises located at the return address in Colchester is a mixed-use commercial property housing several businesses and apartments.

in Quincy.<sup>5</sup>

- 36. A review of the online filings of the Massachusetts Secretary of State's Office shows that LIN is the registered Business Agent, President, Director, Treasurer, and Secretary for a business called Angel Share Wine & Spirits, Inc. The filings list the business's registered corporate address as 53 Hamilton Street, Quincy, Massachusetts.<sup>6</sup>
- 37. According to the Massachusetts Registry of Motor Vehicles ("RMV"), LIN's residential address is 53 Hamilton Street in Quincy. The date of birth listed in the RMV records matches that listed for LIN in eBay's records.
- 38. On April 13, 2020, I conducted surveillance at 53 Hamilton Street in Quincy and observed a white Toyota Highlander vehicle parked in the driveway bearing Massachusetts license plate 427. According to RMV records, license plate 427 is assigned to a 2015 white Toyota Highlander registered to Jiule LIN with a residential address of 53 Hamilton Street in Quincy.<sup>7</sup>
- 39. On May 11, 2020, a federal search warrant (20-MJ-1086-DLC) was executed at 53 Hamilton Street in Quincy. There, members of law enforcement encountered LIN and

<sup>&</sup>lt;sup>5</sup> My investigation indicates that the portion of the building comprising 51 Hamilton Street is a residence occupied by someone other than LIN.

<sup>&</sup>lt;sup>6</sup> The filings also include a registered street address for the business of 81 Schofield Avenue, Dudley, Massachusetts. Recent surveillance of 81 Schofield Avenue revealed an active liquor, wine, and beer store, as well as a U-Haul rental store at that location. The name "Angel Share Wine & Spirits" appears on the front signage.

<sup>&</sup>lt;sup>7</sup> During additional surveillance at 53 Hamilton Street on April 13, 2020, I observed a black Hyundai Tucson bearing New York license plate 512 parked at the curb. According to New York's Department of Motor Vehicles, that license plate is assigned to a 2016 black Hyundai Tucson registered to someone by the name of H Lin, with a residential address in Brooklyn, NY. During surveillance on April 30, 2020, I again observed both vehicles outside the Hamilton Street address.

recovered one remaining TOAMIT Virus Shut Out device.

40. On the same day, members of law enforcement visited addresses associated with buyers of TOAMIT Virus Shut Out devices from the dealslyn2018 eBay account, including in California, Florida, Illinois, and Ohio. Law enforcement recovered an additional seventeen devices from these buyers.

#### EBAY POSSESSES EVIDENCE, FRUITS, AND INSTRUMENTALITIES

- 41. Based on my experience and training, as well as information provided to me by others, I have probable cause to believe that the communication systems of eBay to be searched contain fruits, evidence, and instrumentalities of violations of the federal statutes listed above, as described in Attachment B.
- 42. I believe that evidence of criminal activity is likely to be found in eBay databases related to the dealslyn2018 account because, among other things, I have learned through the course of the investigation that (1) eBay allows purchasers to communicate with sellers directly; (2) communications took place using the dealslyn2018 account, on the one hand, and the eBay accounts of purchasers of the TOAMIT Virus Shut Out devices, on the other; (3) eBay communicated via its communication system with the dealslyn2018 account on or about March 1, 2020 concerning the removal of listings for TOAMIT Virus Shut Out devices that were listed for sale under the dealslyn2018 account; and (4) user-to-user eBay messages, as well as messages from eBay directly to a seller regarding prohibited items and/or removed item listings, are retained for a period of four years.

#### LEGAL AUTHORITY

43. The government may obtain both electronic communications and subscriber information by obtaining a search warrant. 18 U.S.C. §§ 2703(a), 2703(c)(1)(A).

- 44. Any court with jurisdiction over the offense(s) under investigation may issue a search warrant under 18 U.S.C. § 2703(a), regardless of the location of the Internet company whose information will be searched. 18 U.S.C. § 2703(b)(1)(A). Furthermore, unlike other search warrants, § 2703 warrants do not require an officer to be present for service or execution of the search warrant. 18 U.S.C. § 2703(g).
- 45. If the government obtains a search warrant, there is no requirement that either the government or the provider give notice to the subscriber. 18 U.S.C. §§ 2703(b)(1)(A) and (c)(3).

## FOURTEEN-DAY RULE FOR EXECUTION OF THE WARRANT

- 46. Federal Rule of Criminal Procedure 41(e)(2)(A),(B) directs the United States to execute a search warrant for electronic evidence within fourteen days of the warrant's issuance. If the Court issues this warrant, the United States will execute it not by entering the premises of eBay, as with a conventional warrant, but rather by serving a copy of the warrant on the company and awaiting its production of the requested data. This practice is approved in 18 U.S.C. § 2703(g) and is generally a prudent one because it minimizes the government's intrusion onto the Internet company's physical premises and the resulting disruption of their business practices.
- 47. Based on my training and experience, and that of other members of law enforcement, I understand that email and social media providers, as well as companies like eBay whose services include internal messaging, sometimes produce data in response to a search warrant outside the fourteen-day (formerly ten-day) period set forth in Rule 41 for execution of a warrant. I also understand that electronic communication companies sometimes produce data that was created or received after the fourteen-day deadline ("late-created data"). The United

States does not ask for this extra data or participate in its production.

- 48. Should eBay produce late-created data in response to this warrant, law enforcement personnel will seek to avoid reviewing any late-created data that was created by or received by the account-holder absent a follow-up warrant. However, I request permission to view all late-created data that was created by eBay, including subscriber, IP address, logging, and other transactional data, without a further order of the Court. This information could also be obtained by grand jury subpoena or an order under 18 U.S.C. § 2703(d), neither of which includes a fourteen-day time limit.
- 49. For these reasons, I request that the Court approve the procedures in Attachment B, which sets forth these limitations.

#### **CONCLUSION**

- 50. Based on the information described above, I have probable cause to believe that that Jiuele LIN has violated FIFRA, 7 U.S.C. §§ 136j(a)(1)(A), 136j(a)(1)(E), and 136l; and the statutory provisions against mailing injurious articles, 18 U.S.C. § 1716; importation contrary to law, 18 U.S.C. § 545; mail fraud, 18 U.S.C. § 1341; wire fraud, 18 U.S.C. § 1343; and conspiracy to commit such offenses, 18 U.S.C. §§ 371 and 1349.
- 51. Based on the information described above, there is probable cause to believe that the dealslyn2018 eBay account, as described in Attachment A, contains fruits, evidence, and instrumentalities of these crimes, as described in Attachment B.

(continued on next page)

52. The procedures for copying and reviewing the relevant records are set out in Attachment B.

Sworn to under the pains and penalties of perjury,

Kevin R. Gaul, Special Agent Environmental Protection Agency Criminal Investigations Division

Subscribed and sworn to before me on June \_\_\_\_\_\_, 2020, by telephone

Hon. Donald L. Cabell

United States Magistrate Judge

## ATTACHMENT A

## DESCRIPTION OF THE PREMISES TO BE SEARCHED

The premises to be searched are (1) the eBay account associated with the user name "dealslyn2018", (2) other user-generated data stored within this account, and (3) associated subscriber, transactional, and user connection information associated with the account, as described further in Attachment B. This information is maintained by eBay, Inc., which accepts service of process at 2025 Hamilton Avenue in San Jose, California and via its online law enforcement portal at https://le.corp.ebay.com/LEPortal CommunitiesLogin.

### **ATTACHMENT B**

### I. Search Procedure

- A. Within fourteen days of the search warrant's issue, the warrant will be served on eBay personnel, who will identify the accounts and files to be searched, as described in Section II below.
- B. The company will then create an exact electronic duplicate of these accounts and files ("the account duplicate").
  - C. The company will provide the account duplicate to law enforcement personnel.
- D. Law enforcement personnel will then search the account duplicate for the records and data to be seized, which are described in Section III below.
- E. Law enforcement personnel may review the account duplicate, even if the company produced it after fourteen days from the warrant's issue, subject to the following limitations. If the company provided data that was created after fourteen days from the warrant's issue ("late-created data"), law enforcement personnel may view all late-created data that was created by the company, including subscriber, IP address, logging, and other transactional data, without a further order of the Court. Law enforcement personnel will seek to avoid reviewing any late-created data that was created by or received by the account-holder(s), such as e-mail, absent a follow-up warrant.

## II. Accounts and Files to Be Copied by Company Personnel

- A. All data files associated with the account associated with eBay user name dealslyn2018 in the following categories:
  - 1. Biographical profile information entered by the user;
  - 2. Information regarding the user's activities on eBay;

- 3. Communications and messages published, sent, or received by the user, including messages from eBay concerning items prohibited from sale and/or removed from listing;
- B. The contents of all messages and communications, e.g., email, SMS text, etc., associated with the dealslyn2018 eBay account, including stored or preserved copies of messages and communications sent to and from the accounts, drafts, the source and destination addresses associated with each, the date and time at which each was sent, and the size and length of each message or communication;
- C. All records related to, and contents of, communications between eBay and any person regarding the dealslun2018 eBay account, including records of actions taken;
- D. All subscriber and transactional records for the dealslyn2018 eBay account and any associated accounts, including:
  - 1. Names;
  - 2. Addresses, including physical addresses, email address, and IP addresses;
  - 3. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions;
  - 4. Telephone or instrument numbers; and
  - 5. Means and source of payment;
- E. All records pertaining to devices from which the dealslyn2018 eBay account was accessed, including to the extent available device serial numbers, model type/number, IMEI, phone numbers, and MAC addresses.

## III. Records and Data to be Searched and Seized by Law Enforcement Personnel

A. Evidence, fruits, and instrumentalities of violations of Title 7 United States Code, Sections 136j(a)(1)(A), 136j(a)(1)(E), and 136l(b)(1)(B); and Title 18, United States Code,

Sections 371, 545, 1341, 1343, 1716, and 1349, occurring after January 1, 2020, including records or data relating to:

- Communications or other information relating to eBay listings designated
  with the numbers 114148050113 and 114147509220 ("TOAMIT Japan
  Virus Shut Out Sanitation Disinfect Card Deodorize [sic] Sanitize" and
  "TOAMIT Japan Virus Shut Out Sanitation Disinfect Card Sanitize");
- 2. The identity and location of any purchasers of these products;
- 3. Communications with purchasers of these products;
- 4. Computer activity in furtherance of the listing sale, and shipment of these products;
- 5. Communications with sellers or buyers of pesticides;
- 6. The identity and past or present location of the user(s) of the dealslyn2018 eBay account;
- 7. The identity, location, and ownership of any computers used to access the dealslyn2018 eBay account;
- 8. Any records pertaining to the means and source of payment for services (including any credit card or bank account number or digital money transfer information);
- 9. Evidence that may identify any co-conspirators or aiders and abettors, including records that help reveal their whereabouts;
- B. All of the subscriber, transactional, and logging records described in Section II (B).