

UNITED STATES DISTRICT COURT **FILED**

EASTERN DISTRICT OF CALIFORNIA

MAR - 2 2009

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
DEPUTY CLERK

UNITED STATES OF AMERICA
v.

GEORGE JACOBSEN
aka George Jacobsen, Jr.
2122 El Camino
Stockton, CA

CRIMINAL COMPLAINT

CASE NUMBER:
209 - MJ - 0077

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **May 2006, to the Present**, in **San Joaquin County and elsewhere**, in the Eastern District of California defendant did,

- ▶ **Transmit in Interstate or Foreign Commerce any Communication Containing any Threat to Injure the Person of Another;**
Make a Threat Concerning an Attempt or Alleged Attempt Being Made or to be Made, to Kill, Injure, or Intimidate any Individual by Means of Fire or an Explosive

in violation of Title 18, United States Code, Sections 875(c) and 844(e). I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

- ▶ **See Attached Affidavit of Special Agent Marina V. Shalfeyeva, Federal Bureau of Investigation, attached hereto and incorporated by reference.**

Continued on the attached sheet and made a part hereof.



Signature of Complainant MARINA V. SHALFEYEVA
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me, and subscribed in my presence

March 2, 2009

at Sacramento, California

Date

City and State

KIMBERLY J. MUELLER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

Name and Title of Judicial Officer

SEALED

**EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO, CALIFORNIA**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Marina V. Shalfeyeva, am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since May of 2006. Prior to my work as a Special Agent for the FBI, I was employed by private companies as a software engineer for several years. I have received specialized training at the FBI training facility, Quantico, Virginia, and as a Special Agent of the FBI, am authorized to investigate crimes in which technology and computers are used as tools to carry out a wide variety of criminal activities, including unauthorized access, fraud, forgery, money laundering, identity theft, breach of intellectual property rights, computer sabotage, crimes against children and the illegal copying of computer programs. I am currently assigned to the FBI's cyber squad of the FBI Sacramento Division and as part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 875(c) and 844(e).

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. I make this affidavit in support of the issuance of a criminal complaint and arrest warrant against George Eric Jacobsen aka George Eric Jacobsen Jr. ("Jacobsen"), DOB: 4/18/63, for violations of Title 18, United States Code, Sections 875(c) and 844(e).

4. This affidavit is based upon my personal observations, review of evidence obtained, and training and experience as a law enforcement agent, as well as my communications with other law enforcement personnel, Stockton Police officers. I have also relied on information received from investigators and employees of Microsoft.

5. I have not included in this affidavit all of the information in my possession relating to the crimes described herein. Rather, I have set forth in this affidavit only such facts as I have deemed necessary to establish probable cause to support this application for an arrest warrant and criminal complaint.

STATUTES

6. Under title 18 U.S.C. § 875(c), it is a federal crime to transmit in interstate or foreign commerce any communication containing any threat to injure the person of another.

7. Under title 18 U.S.C. § 844(e) it is a federal crime to willfully make any threat concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual by means of fire or an explosive.

SUMMARY OF RELEVANT COMPUTER AND INTERNET CONCEPTS

8. Internet Service Providers ("ISPs"): Most individuals and businesses obtain access to the Internet through businesses known as Internet Service Providers (ISPs). AOL, Comcast Communications, Microsoft (MSN), Bellsouth, Yahoo and EarthLink are some of the larger and better-known ISPs. Among other services, ISPs provide their customers with access to the Internet using telephone, cable, Digital Subscriber Lines (DSL), or other telecommunications lines. Each ISP user must establish an account much like a telephone number one often has with a telephone company. ISPs maintain records pertaining to their ISP-subscribers that typically include: the user's Internet Protocol Address ("IP") (which as further described below is assigned to subscribers each time they connect to the Internet); credit card information; billing information; account access information; e-mail transaction information; newsgroup access; posting information; account application information; and other information that records the activities of these accounts.

9. An Internet Protocol address ("IP address") is a unique numeric address used to identify and organize computers which are logged onto the Internet at any one time. An IP address is a series of numbers, each in the range of 0-255, and separated by periods (e.g., 66.53.107.138). Every computer (or group of computers using the same account) accessing the Internet must be assigned an IP address. The IP address acts much like a home or business street address, enabling Internet sites to properly route traffic and transmit e-mails to and from that computer. After an e-mail message is sent from one computer to another, the sender of the e-mail message can be traced from the receiving computer through the sender's IP address. There are two types of IP addresses: dynamic and static. A static IP address is one that is permanently assigned to a given computer on a network. ISPs often assign static IP addresses to cable and DSL customers. With dynamic IP addressing, however, each time a computer

establishes an Internet connection, that computer is assigned a different IP address. For example, each time an ISP user dials into the Internet through the ISP network and establishes an Internet connection, he or she is randomly assigned an IP address from the block of IP addresses controlled by the ISP. When the customer ends the ISP session, the temporarily assigned IP address is placed back into the pool of IP addresses available for temporary assignment to other ISP subscribers.

MSN GROUPS/TV

10. MSN Groups is a commercial community site created by Microsoft. Users can join and create groups using an MSN Passport or Windows Live ID. Members of MSN Groups can use and contribute to message boards, document folders, photo albums and list pages. Some areas may only be accessible to administrators/managers.

11. In order to post message on the MSN Group one must be a member of that site. After joining, which requires among other things an email account, the member creates a nickname for the account.

12. MSN TV (formerly WebTV) is a device that allows a client to use a television for display, rather than a computer monitor. WebTV is a device for web access. The WebTV product is an adapter that allows a television set to be connected to the Internet, primarily for web browsing and e-mail. The setup includes a web browser, cord or wireless (i.e. bluetooth or IRDA) keyboard and connection to the Internet (i.e. using modem, ADSL, cable, PLC).

PROBABLE CAUSE STATEMENT

Introduction

13. There is probable cause to believe that George Eric Jacobsen aka George Eric Jacobsen Jr. ("Jacobsen") violated federal criminal statutes by making specific threats to injure and kill Stockton police officers and their families. Jacobsen, using multiple aliases, posted threats on his MSN Group site known as Ways2KillAStocktonPoliceOfficer. Jacobsen has been identified as the author of the threatening posting by his email addresses, nicknames, IP address tracing, and other identification methods.

14. In or about 2006, Jacobsen used MSN groups to create a site known as Ways2KillAStocktonPoliceOfficer. Jacobsen, using

the nickname "981116GJ222" was the manager of this MSN Group. As the manager, Jacobsen could create and modify the MSN Group. This nickname is associated with an email account, dasgeo@hotmail.com which is a known email account of Jacobsen.

15. Additionally, according to information obtained from MSN, I know that Jacobsen used numerous nicknames such as: "75514TUD56"; "Death4Simpson"; and "981116GJ222". These nicknames were associated with email accounts used by Jacobsen: namely: "75514TUD56" is associated with the email account elcamino2122@hotmail.com. The nickname "Death4Simpson" was associated with the email account dosgeo@hotmail.com. "981116GJ222" was associated with dasgeo@hotmail.com.

16. Ways2KillAStocktonPoliceOfficer contained "links" to material on the group. Specifically, there were links entitled:

22 Ways to kill a Stockton Police Officer with your hands;

Police Officers Home Address And family info;

How to blow up a police car;

The Joy of Killing Young Republicans;

Revenge on Police officers Children at college;

10 Ways To Kill A Police Officer;

Kill a Cop; and

Stockton Police Officers Damned to Hell.

The link, "Kill a Cop" provided a web page containing the following "when the game of life makes you feel like quitting (sic) it helps a lot if you, kill a cop...kill a cop feed it turpin-tine or break its spine, crush it with your shoe...ye must kill a cop...hit him with your van, throw him at a train, make him snort cocaine, drown him in a lake, sick some TNT, up his booty, do what you must do, as long as you kill a cop".

TREATS POSTED BY JACOBSON

Threats Using Nickname "75514TUD56"

17. Facts provided below show that Jacobsen is associated with the e-mail account elcamino2122@hotmail.com and the nickname "75514TUD56" utilized to post several messages of hate on the MSN

group Ways2KillAStocktonPoliceOfficer. Subpoena results provided by MSN regarding this MSN group revealed that the e-mail account elcamino2122@hotmail.com is identified with the nickname "75514TUD56". According to the subpoena results and analysis of the above MSN group on the Internet, Jacobsen used the nickname "75514TUD56" to post the following information on the MSN group Ways2KillAStocktonPoliceOfficer.

18. Specifically, on 6/12/2006, Jacobsen created the MSN group's album called "Hit List" on this MSN group using nickname "75514TUD56". Furthermore, Jacobsen posted the following messages of hate in the album using the same nickname:

- On 6/12/2006, at 10:21:16 pm, file "pat withrow.jpg" with the caption "Pat Withrow" depicting a picture police officer with the text "In his head or his back or we hope a heart attack Home Address 550 Chablis Dr Escalon, CA 95320-9692".

- On 3/10/2007, at 9:49:24 am, file "bilde.jpg" in the album "Hit List". The file had the caption "kill this bastard" and contained a picture of a police officer. The following text was displayed above the picture: "Benjamin Torres, 409 E Alameda St Manteca, CA 95336-3934, (209)825-8975".

- On 3/16/2007, at 12:48:22 pm, file story_nyc_shoot_police_ap.jpg with the caption "Dead Pigs" in the album "Hit List" from the IP address 66.53.107.138. The picture depicted two police officers.

- On 5/28/08, a posting in "Hit List" of a picture of Chief of the Stockton Police Department, Thomas T. Morris, on the MSN group page Ways2killAStocktonPoliceOfficer.

19. On 3/16/2007, at 12:46:24 pm, Jacobsen posted a message entitled "A Good Start in New York" using nickname "75514TUD56". The message contained a description of a fatal shooting of two unarmed volunteer police officers Nicholas Todd Pekearo and Eugene Marshalik in Greenwich Village.

20. On 4/1/2007, at 3:27:43 pm, and on 4/30/2007 at 11:08:00 am, Jacobsen using the nickname "75514TUD56" posted a message with the subject: "Join Americans for the overthrow of the U.S.A. government".

21. On 4/19/2007, in the section "Stockton Police Officers Damned to Hell" of the MSN group Ways2KillAStocktonPoliceOfficer Jacobsen, using the nickname 75514TUD56, posted biographical information of several police officers of the Stockton Police

Department and descriptions of how the officers were killed. Titles of each posting regarding the police officers included the following: "Damned to Hell".

Threats using NICKNAME "981116GJ222"

22. There is further probable cause that Jacobsen used the nickname "981116GJ222" to post several threatening messages on Ways2KillASTocktonPoliceOfficer. Nickname "981116GJ222" is associated with dasgeo@hotmail.com, a known email account of Jacobsen.

23. A summary of the threats made include:

a. On 5/7/2006, at 5:58:21 pm, Jacobsen posted file "svd01.jpg" using nickname "981116GJ222" in the MSN group's album "Hit List" from the IP address 64.13.34.78. The file contained a photo of a rifle with the caption "~~~ Is grate to kill cops with ~~~" . Clearwire, LLC, Kirkland, WA, indicates that the IP address 64.13.34.78 was assigned to a Clearwire customer(s) in Clearwire's Reno-Carson City market.

b. On 5/9/2006, Jacobsen posted messages with the subject "Mayor Edward J. Chavez needs 2 Die.": "ya cool I hope that fucker dies 2" and "Die Pig".

c. On 11/14/2006 at 10:59:55 am, Jacobsen posted an image "Robert Paoletti.jpg" in the album "Hit List" from the IP address 74.60.75.195. The image had caption "Robert Paoletti" and text above the picture: "The joy of Killing this mouther fucker watching him die in slow pain". A Whois database search revealed that the IP address 74.60.75.195 corresponds to Reno, NV.

Threats using nickname "DEATH4SIMPSON"

24. Facts provided below show that Jacobsen is associated with the e-mail account dosgeo@hotmail.com and the nickname "Death4Simpson" utilized to post several threatening messages on Ways2KillASTocktonPoliceOfficer:

a. On 5/9/2006, at 10:59:30 pm, Jacobsen posted the following message utilizing nickname "Death4Simpson": "I hope someone kills that fucker" with the subject "Mayor Edward J. Chavez needs 2 Die".

///

b. On 10/4/2006, at 1:49 pm, Jacobsen posted message "Kill Foley the Fag from Florida" and "Former Rep. Mark Foley, a Florida Republican".

25. This nickname is associated with the e-mail account dosgeo@hotmail.com which is a known account of Jacobsen.

Evidence Linking Jacobsen to the Threats

Analysis of the email accounts corresponding to MSN group nicknames

26. During this investigation, I have obtained records from ISPs used by Jacobsen to send and receive email. I have determined the Jacobsen uses accounts such as elcamino2122@hotmail.com; dosgeo@hotmail.com; dasgeo@hotmail.com, and awiccan@hotmail.com among others. As set forth herein, these accounts are associated with the nicknames used by Jacobsen and were used by him to send and receive emails. I have also obtained IP information linking Jacobsen to the threatening messages and/or email accounts used to post them.

27. On April 11, 2008, a search warrant was served at MSN to obtain records regarding the following email accounts:

elcamino2122@hotmail.com
dosgeo@hotmail.com
dasgeo@hotmail.com
awiccan@hotmail.com

elcamino2122@hotmail.com related to Nickname 75514TUD56

28. MSN search warrant results for the above four e-mail accounts revealed that the IP address 74.60.71.15 was utilized to access email account elcamino2122@hotmail.com on 04/22/2008. Clearwire LLC, Kirkland, WA, provided the following information pursuant to a Grand Jury subpoena regarding this IP address 74.60.71.15. The IP address was bound to a device that accessed the Clearwire network using a Clearwire modem associated with the Clearwire customer, George Jacobsen, billing address: P.O. Box 1481, Reno, NV 89501, service address: 200 Mill Str., #503, Reno, NV 89501 and email address elcamino2122@hotmail.com.

SA Shalfeyeva determined that 200 Mill Street, Reno, NV 89501 is the address for the Lakemill Lodge. The clerk at the hotel confirmed that in 2008 Jacobsen resided at this motel for

an extended period of time and that he resided in different rooms. The clerk advised that Jacobsen was not presently at the motel.

29. MSN search warrant results for elcamino2122@hotmail.com revealed that several purchases were made on the name of Jacobsen using this email account:

a. On April 27, 2006, at 11:13:59 -0500, an email message was sent From: "Household Bank Customer Care Message Conformation" <customerarc@householdbank.com>, To: George Jacobsen <elcamino2122@hotmail.com>.

b. An attachment to the e-mail message sent from "unlistednone<elcamino2122@hotmail.com>" to "elcamino2122@hotmail.com", "Date: Sun, 12 Mar 2006 11:31:32 -0800", contained an order confirmation for purchasing a "packet 8 freedom Unlimited" on 3/11/2006, at 7:25:40 pm, "order ID: 291275000" with the billing address: George E. Jacobsen, P.O. Box 1481, Reno, NV 89505" and the shipping address: George Jacobsen, 200 Mill St., 503, Reno, NV 89501.

c. An e-mail was sent from "Renters Mail <rentersmail@assurant.com>", to "<elcamino2122@hotmail.com>" with the subject: "Insurance", and "Date: Feb 27, 2007 at 21:36:19 -0800". Message was regarding George Jacobsen's application for Renters Insurance to American Bankers Insurance Company of Florida. The insurance became effective on 03/01/07, policy number RIN0232390, and the address for Jacobsen provided in the email was 200 Mill St., suite #758, Reno, NV 89501.

d. Message dated February 27, 2007 at 21:36:19 -0800 was sent from "Renters Mail <rentersmail@assurant.com>, to elcamino2122@hotmail.com with the subject: "Insurance". Message was regarding George Jacobsen's application for Renters Insurance to American Bankers Insurance Company of Florida. The insurance became effective on 03/01/07, policy number RIN0232390, address for Jacobsen provided in the email is 200 Mill St. Suite #758, Reno, NV 89501.

e. Message sent From: Documents@GEICO.com, Elcamino2122@HOTMAIL.com, dated "26, Dec 2006, 22:14:18 GMT", subject "Your requested Document for policy 4085144493. Email attachment contained the following information: a temporary ID, Nevada evidence of required motor vehicle liability insurance, policy number 4085144493, effective date 12-27-06, year 1992, Make GMC, Model SAFARI, vehicle identification number(VIN) 1GDDM19Z1NB502987, insured: George Jacobsen, P.O. Box 1481, Reno,

NV 89505-491, Geico Indemnity Company, Box 509090, San Diego, CA 92150. According to a record check conducted by the Sacramento FBI office the above VIN number corresponds to vehicle with the license plate 2ZMP517 registered to George E Jacobsen, 5100 N HWY 99 #117, Stockton, CA 95212.

f. Message was sent from "DO NOT REPLY@registerfly.com", to "ELCamino2122@HotMail.com", subject "RegisterFly.com Payment Receipt, dated "20 Oct 2007 14:35:01 -0500". Email contained a Registerfly.com payment, "Date: 2007-10-20", "Customer Information: George Jacobsen", P.O. Box 1481, Reno, NV 89505. "Description: "Misc Goods/services", "Amount: 9.99."

g. Message was sent from "DO NOT REPLY@registerflysupport.com," to "ElCamino2122@HotMail.com", dated "20 Oct 2007 14:32:03 -0500", subject "Welcome to RegisterFly.com." The email contains the following "Geo Jac, Welcome to RegisterFly.com", "You may log into your account to Manage your domains using the following username and password", "Username: Koldun", "Password: reno2007."

h. Message was sent from shipping_desk@clearwire.com to elcamino2122@hotmail.com, dated "Tue, 26 Dec 2006 13:29:51 -0600", with subject "Clearwire Customer Return Notification". The email contained a notification that Clearwire received the modem with the serial number 0029X425SCAX00278561 returned by the email recipient.

Dasgeo@hotmail.com Related to Nickname 981116GG222

30. MSN search warrant results for dasgeo@hotmail.com revealed the following:

a. On 01/18/2007, an email message was sent from "onlinebanking@alert.bankofamerica.com", to "DASGEO@HOTMAIL.COM", with the subject "Bank of America Alert: Available balance". The message contained bank of America statement with the following information:

To: GEORGE JACOBSEN
Account: MYACCESS CHECKING ending in 1483
Date: 1/18/2007
Available Balance: \$23.32

b. MSN provided file "UserInfo.html" for the e-mail account dasgeo@hotmail.com pursuant to the search warrant. The file contained a Web TV billing information for the member ID "parent" account jakeaddie@webtv.net and the following address was specified: 5100 no hwy 99 Sp 117, Stockton, CA 95212, telephone number (209)931-3487. Subscription information was: "MTV-00052 Annual MSN TV Narrowband Unlimited (\$199.95/year) - purchased 05/15/2008" and subscriber accounts were: Elcamino2122@hotmail.com, jakeaddie@webtv.net, dasgeo@hotmail.com, elcamino2122@msn.com, jakeaddie@msn.com.

Dosgeo@hotmail Related to Nickname Death4Simpson

31. MSN search warrant results for dosgeo@hotmail.com revealed the following:

a. MSN provided the following information pursuant to the search warrant regarding the e-mail account dosgeo@hotmail.com. The e-mails below reveal that Jacobsen is associated with the e-mail account dosgeo@hotmail.com and with the nickname "Death4Simpson":

b. An e-mail was sent from "7757721617.mms.att.net", to dosgeo@hotmail.com", dated June 7, 2007, "01:29:50 -0400", with the subject: "Multimedia message". The email contained an attachment with a picture that resembled Jacobsen. Database records check conducted by the Sacramento FBI office revealed that in the sexual offender registry information section the above number 775-772-1617 is the telephone number for George Eric Jacobsen, a sexual offender, date of birth 04/18/1963, 200 Mill Str, 758, Reno, NV 89501."

c. An e-mail was sent from "BuyExtras.com Support Team <support@buyextras.com>", to "dosgeo@hotmail.com", with the subject "BuyExtras.com - order no. 81784". The message indicated that a "USB to Ethernet 10/100 Mbps Network Adapter(Bulk)" was shipped to George Jacobsen, P.O. Box 1481, Reno, NV 89505 and the bill was sent to George Jacobsen at the same address, order number was 81784 and order date was 08/03/2006.

d. An e-mail was sent from "<service@microsoft.com>", to "<dosgeo@hotmail.com>", with the subject "Microsoft Order in Process - Order number: 01112010585784", and dated June 24, 2006, "21:26:33 -0700". Message indicated that "George Erich Jacobsen", P.O. Box 1481, Reno, NV 89505, ordered "Windows XP Professional x64 Trial Software Kit" on June 24, 2006, and the

product was shipped to "George Jacobsen Jacobsen", 200 Mill St., Reno, NV 89501.

32. San Joaquin County Superior Court records indicate that the civil case number CV017593 was filed on 06/07/2002 with plaintiff George Erich Jacobsen and defendant Marvin L. Simpson. Facts shown above indicate that Jacobsen used nickname "Death4Simpson".

33. The search warrant results regarding several e-mail accounts provided by MSN revealed that the IP address 74.60.73.29 was utilized to access e-mail address dosgeo@hotmail.com on 2/7/2008. Clearwire LLC, Kirkland, WA, provided the following information pursuant to a Grand Jury subpoena regarding this IP address 74.60.73.29: the IP address was bound to a device that accessed the Clearwire network using a Clearwire modem associated with the Clearwire customer, George Jacobsen, billing address: P.O. Box 1481, Reno, NV 89501, service address: 200 Mill Str., #503, Reno, NV 89501 and email address elcamino2122@hotmail.com.

Addresses Associated with Jacobsen

34. California Department of Motor Vehicles confirmed the registered address of George Eric Jacobsen to be 2122 El Camino Ave, Stockton, CA 95209. This physical address is the basis for the email account elcamino2122@hotmail.com. According to a database records check conducted by the Sacramento FBI, Jacobsen is the owner of this residence. Detective Scott Graviette, Stockton Police Department, also informed that Jacobsen's neighbor at this location confirmed that Jacobsen resides there. Postal Inspector, Michael Chavez, advised that the residence has been vacant for approximately one and a half years.

*MSJ
current*

35. Database records check conducted by Sacramento FBI revealed that the following address was also associated with Jacobsen: 5100 North Hwy 99, Space 117, Stockton, CA 95212. On June 30, 2008, Detective Graviette observed Jacobsen walking into this residence. On July 9, 2008, Detective Graviette drove by the residence and observed Jacobsen inside the house looking through the window. A vehicle with Nevada license plate 646VCM was also seen by Stockton police officers parked at 5100 North Hwy 99, Space 117, Stockton, CA. Detective Graviette recorded the license plate number and subsequently learned that the registered owner of that vehicle is Jacobsen. Postal Inspector, Michael Chavez, advised that Adelaide Caruso receives mail at 5100 North Hwy 99, Space 117, Stockton, CA. Pursuant to the search warrant regarding the e-mail account dasgeo@hotmail.com

associated with Jacobsen, MSN provided records containing a Web TV billing information for member ID "Parent" account jakeaddie@webtv.net. The following address was specified for this Web TV account: "Name": "Addie Caruso", "Address": "5100 no hwy 99 sp 117, Stockton, CA 95212", telephone number: "(209)931-3487". "Subscription": "Annual MSN TV Narrowband Unlimited (\$199.95/year)-Purchased 2008-05-15", "Subscriber Accounts": "Elcamino2122@hotmail.com, jakeaddie@webtv.net, dasgeo@hotmail.com, elcamino2122@msn.com, and jakeaddie@msn.com".

36. Database records check also revealed that the following address was associated with Jacobsen: 5100 N Hwy 99, Space 116, Stockton, CA 95212. Postal Inspector, Michael Chavez, advised that "Geo Jacobson" and "Comp 4 Less" receive mail at 5100 North Hwy 99, Space 116, Stockton, CA.

37. Subpoena results obtained from Clearwire, LLC regarding IP addresses 74.60.71.15 and 74.60.73.29 revealed that the address P.O. Box 1481, Reno, NV is associated with Jacobsen. Search warrant records regarding email accounts elcamino2122@hotmail.com and dosgeo@hotmail.com provided by MSN specified this address as the billing address for Jacobsen. Database records check also revealed that the following address was associated with Jacobsen: P.O. Box 1481, Reno, NV 89505. According to Postal Inspector Michael Chavez, P.O. Box 1481, Reno, NV 89505 was opened on 8/26/2005. The following name is associated with the P.O. Box: George Jacobsen, Utah drivers permit #173601907, 135 or 136 2nd street, #503, Reno, NV 89501.

38. Search warrant records regarding email accounts elcamino2122@hotmail.com and dosgeo@hotmail.com revealed the following shipping address for George Jacobsen: 200 Mill St., 503, Reno, NV 89501. In June, 2008, Clearwire, LLC provided records pursuant to a Grand Jury subpoena indicating that IP address 74.60.71.15 used to access email account elcamino2122@hotmail.com was bound via DHCP exclusively to a device that accessed the Clearwire network using customer premises equipment (CPE, AKA "Clearwire modem"). The equipment is associated with the account of George Jacobsen and the service address: 200 Mill Street, #503, Reno, NV 89501. On June 17, 2008, SA Shalfeyeva contacted motel Lakemill Lodge over the phone. The motel is located at 200 Mill Street, Reno, NV 89501, and asked a motel clerk if Jacobsen was at the motel. The clerk advised that Jacobsen was not presently at the motel, and that he left and has not come back yet. The clerk advised that Jacobsen is not staying in room 503 anymore, but staying in room number 750. On July 18, 2008, SA Michael P. Brewer confirmed that Jacobsen is staying in the motel Lakemill Lodge, at 220 Mill

Street, #750, Reno, NV. A manager at Lakemill Lodge advised that Jacobsen has been living at the motel for several years and paid his rent until July 29, 2008.

Threats Posted on Ways2killastocktonpoliceofficer Using Other Nicknames

39. Furthermore, the following analysis of the subpoena results provided by MSN regarding the MSN group Ways2KillASTocktonPoliceOfficer shows Jacobsen's connection to several e-mail addresses and nicknames provided below and utilized to post messages of hate on the MSN group Ways2KillASTocktonPoliceOfficer:

a. A message under the subject "Death 2 Judge Hammerstone and spd officer Simpson" was posted on 10/10/2006, at 10:44:54 am by an individual using the nickname "604851jQ52" associated with the email address "georussia@hotmail.com". Subpoena results provided by MSN regarding the e-mail account georussia@hotmail.com revealed that "Personal information" for this e-mail account contained "first name": "geo" and "last name": "jacobsen".

b. On 5/9/2007, at 8:36:58, an individual with the nickname "Wiccan-Warlock" and email address "awiccan@hotmail.com" posted a message with the message subject: "Death Order for Jeff Cristofani, 41 of Tracy, CA". Among other information, the message body contained the following: "Police officer guilty three counts of oral copulation with boy younger than 18". The subpoena results obtained from MSN regarding the email address awiccan@hotmail.com revealed that the IP address 74.60.73.29 provided for this email account was utilized on 08/03/2007 at 2:41:14 pm(PDT). According to the subpoena results regarding the email address dasgeo@hotmail.com associated with Jacobsen, the same IP address 74.60.73.29 was utilized on 08/03/2007 at 2:43:19 pm(PDT).

c. On 7/31/2006, at 7:46:44 am, an individual with the nickname "332821BW38" and email address biloxiwarlock@hotmail.com posted message with the message subject: "Mayor Edward J. Chavez needs 2 Die". The message body included the following: "Kill that sicko". According to subpoena results provided by MSN regarding the MSN group Ways2KillASTocktonPoliceOfficer for biloxiwarlock@hotmail.com, the IP address 66.233.133.142 was utilized on 04/2/2007 at 22:01:00. The same IP address 66.233.133.142 was utilized on the same date, 04/2/2007, at 22:09:58, according to the subpoena results provided by MSN for the e-mail account

datlv@hotmail.co.uk. Passport data for the email account datlv@hotmail.co.uk contains the following personal information: first name "Clint" and last name "Kitchen". According to the information received from MSN pursuant to the search warrant regarding four e-mail accounts described above, PG&E bills were sent to "Clint J Kitchen" to the email address elcamino2122@hotmail.com associated with Jacobsen. Specifically, an e-mail message was sent from "<support@netgram.com>", to "<elcamino2122@hotmail.com>", "Date: Tue, 04 Apr 2006 00:49:16 -0400", with the subject: "Postal Mail Document Proof - 119433.PDF". The message contained file "p127306-s12178-r66096_doc.pdf" in the attachment with a document containing names George E Jacobsen and Clint J. Kitchen. The document contained PG&E bill and a back rent due note. So, the e-mail account biloxiwarlock@hotmail.com utilized by the individual who posted the hate message described above is associated with the e-mail account datlv@hotmail.co.uk and correspondingly with the e-mail account elcamino2122@hotmail.com identified with Jacobsen.

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Based on reviewing documents
Clint Kitchen is the name used by Jacobsen.

(C)

d. The following analysis shows Jacobsen's connection to the following e-mail accounts utilized by members of the MSN group Ways2KillASTocktonPoliceOfficer. Grand Jury subpoena and search warrant results provided by MSN revealed that IP address 74.60.73.29 was used to access the following e-mail accounts associated with Jacobsen: dasgeo@hotmail.com, dosgeo@hotmail.com, elcamino2122@hotmail.com. The same IP address was also used to access the following email accounts utilized by members of MSN group Ways2KillASTocktonPoliceOfficer: awiccan@hotmail.com, daswarlock2122@hotmail.com, daswarlock2@hotmail.com, iceloard@hotmail.com, jakeaddie@webtv.net and stocktonwolf@hotmail.com.

e. Furthermore, Grand Jury subpoena results provided by MSN regarding MSN group Ways2KillASTocktonPoliceOfficer revealed that IP address 64.13.33.0 was used to access e-mail account elcamino2122@hotmail.com associated with Jacobsen. This IP address was also used to access the following e-mail account associated with members of this MSN group:

- BiloxiWarlock@hotmail.com
- bostonVicarwarlock@hotmail.com
- datlv@hotmail.co.uk
- Icwarlock@hotmail.com
- Marbles_Von_kot@hotmail.com
- Parkwoods_apocuary@hotmail.com
- protowarlock@hotmail.com
- Rev_George_E_Jacobsen3Rd@hotmail.com

Sorcerergott@hotmail.com
Sorcererofprovo@hotmail.com
Vicaroferie@hotmail.com
warlockcock7@hotmail.com
WichitaSorcerer@hotmail.com
wichitaWarlock@hotmail.com
WolfWarlock@hotmail.com.

Threats Posted On The MSN Group STOCKTONCITYWATCH

40. Your affiant conducted an Internet search and observed that Jacobsen utilizing nickname "75514TUD56" posted several messages of hate on the MSN group STOCKTONCITYWATCH. The same nickname "75514TUD56" was associated with Jacobsen and was used to post hate messages described above on the MSN group Ways2KillAStocktonPoliceOfficer. The messages are provided below:

a. On 07/09/2005 at 3:04 pm, an individual with the nickname "75514TUD56" posted a message with the following subject "Death to stockton police officer Simpson".

b. On 2/23/2008 at 6:22 am, an individual with the nickname "75514TUD56" responded the following to a message with the subject: "Edward Chavez assassination fund": "Make cheeks out to the Eca Fund 1455 De Maisonneuve Blvd. W., GM-606, Montreal, Quebec H3G 1M8, Canada".

c. On 5/24/2008 at 11:55 pm, an individual with the nickname "75514TUD56", responded the following to a message with the subject: "Its time to kill Thomas T. Morris": "A steel baseball Bat ?"

41. On 5/3/2006 at 8:09 am, an individual with the nickname "24864JH456", responded the following to a message with the subject: "Death to stockton police officer Simpson": "slit his thought from ear 2 ear". According to the Grand Jury subpoena results provided by MSN regarding MSN group Ways2KillAStocktonPoliceOfficer, this nickname "24864JH456" is associated with the email account warlockcock7@hotmail.com. As shown above, this e-mail address was accessed from the same IP address as the e-mail address elcamino2122@hotmail.com associated with Jacobsen.

42. On 4/29/2003 at 3:12 pm, an individual with the nickname "Geo. E. J." posted a message with the following

subject: "The Damned: May Mark Be !" The message informed that Stockton police officer Mark Bloom died on April 27, 2003.

Interstate Commerce

43. Subpoena results obtained from MSN on January 20, 2009 indicate that MSN Groups servers were located in Washington from January 1, 2006 to at least January 20, 2009. The known addresses for Jacobsen are 2122 El Calmino Avenue, Stockton, CA 95209; 5100 N. Highway 99 116, Stockton, CA 95212; 5100 N. Highway 99 117, Stockton, CA 95212 200 Mill St. Suite #758, Reno, NV 89501.

44. Based on aforementioned factual information, your affiant respectfully submits that there is probable cause to believe George Eric Jacobsen has violated Title 18 U.S.C. Sections 875(c) and 844(e) and respectfully requests that an arrest warrant and criminal complaint be issued.

SEALING REQUEST

45. I respectfully request that this Affidavit and Application and Search Warrant be sealed until the execution of the search warrant. Disclosure of the search warrant affidavit at this time would seriously jeopardize the ongoing investigation as the targets would not otherwise be aware of the scope of this warrant or that their activities are currently the subject of an ongoing investigation. Disclosure at this time would provide the targets with the opportunity to destroy evidence, change patterns of behavior, notify other confederates, or allow confederates to flee.

46. Further, the investigation in this matter is continuing, and disclosing the affidavit's contents prior to execution will likely preclude or impede the agents and

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investigators working on this matter from investigating new criminal activity or leads.

mshej

Marina Shalfeyeva
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me
this 2nd day of March 2009

Kimberly A. Mueller

HON. KIMBERLY A. MUELLER
UNITED STATES MAGISTRATE JUDGE

Approved as to form and content

Robin Taylor

AUSA Robin Taylor