

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
County of Santa Barbara  
2 By: RONALD J. ZONEN (State Bar No. 85094)  
Senior Deputy District Attorney  
3 J. GORDON AUCHINCLOSS (State Bar No. 150251)  
Senior Deputy District Attorney  
4 GERALD McC. FRANKLIN (State Bar No. 40171)  
Senior Deputy District Attorney  
5 1112 Santa Barbara Street  
Santa Barbara, CA 93101  
6 Telephone: (805) 568-2300  
FAX: (805) 568-2398  
7

**FILED**  
SUPERIOR COURT of CALIFORNIA  
COUNTY of SANTA BARBARA

SEP 28 2004

GARY M. BLAIR, Executive Officer  
By *Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SANTA BARBARA**  
10 **SANTA MARIA DIVISION**

11  
12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 v.

15 **MICHAEL JOE JACKSON,**

16 Defendant.  
17

No. 1133603

**REDACTED**  
**COPIES OF**  
**SEARCH WARRANT NOS.**  
**SW 5141 through 5152**

18  
19 Attached are redacted copies of the following search warrants:

20 American Express (warrant no. SW 5141), Citicorp Credit Services

21 (SW 5142), Bank of America (SW 5143), Bergdorf

22 Goodman/Nieman Marcus (SW 5144), Capital One Bank (SW

23 5145), Chevron/Standard Oil (SW 5146), Federated Dept. Stores

24 (Bloomingdales/Macys) (SW 5147), Bank One/First USA Bank (SW

25 5148), Fleet Credit Card Svcs (SW 5149), MBNA America (SW

26 5150), GE Consumer Card Svcs (Mobil) (SW 5151), and Nordstroms

27 Card Svcs (SW 5152).  
28

////

1 DATED: September 27, 2004

2 THOMAS W. SNEDDON, JR.  
3 District Attorney

4 By: 

5 Gerald McC. Franklin, Senior Deputy

6 Attorneys for Plaintiff

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO ( X )

**(SEARCH WARRANT)**

**THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA:** proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony.

**YOU ARE THEREFORE COMMANDED TO SEARCH:** American Express, Attn: Custodian of Records, 888 South Figueroa Street #1770, Los Angeles, CA 90017.

**For the following:** Refer to attachment "A"

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney J. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO ( X )

Judge of the Santa Barbara Superior Court, Santa Maria Division

[illegible]

- [illegible]

[illegible][illegible]



STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner  
(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** CT Corporation System (acting as the registered agent for Citicorp Credit Services, Inc., USA) 818 West Seventh Street, Los Angeles, CA 90017.

For the following: Refer to attachment "A"

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this **23rd day of September, 2004**, at **1:25** **AM**/P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney J. Melville  
(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

## ATTACHMENT "A"

1. Documentation held by Citicorp Credit Services Inc., USA c/o CT Corporation System pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by, or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by Citicorp Credit Services Inc., USA c/o CT Corporation System, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to Citicorp Credit Services Inc., USA c/o CT Corporation System including bank names, account numbers and if possible, any captured images of checks sent to Citicorp Credit Services Inc., USA c/o CT Corporation System, [REDACTED]. If the account holder/ user did not send monies to Citicorp Credit Services Inc., USA c/o CT Corporation System during [REDACTED], then the requested payment information should be for the next closest date.

### Account numbers:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Bank of America, Legal Process/ subpoena compliance, 1000 West Temple Street, Los Angeles, California 90012, Mail code CA9-705-05-19. For the following:

1. Documentation held by Bank of America pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below-listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by Bank of America, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to Bank of America including bank names, account numbers and if possible, any captured images of checks sent to Bank of America, during [REDACTED]. If the account holder/ user did not send monies to Bank of America during [REDACTED] then the requested payment information should be for the next closest date.

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 AM/P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney S. Melville

(Signature of Magistrate)

Judge of the Santa Barbara Superior Court, Santa Maria Division

NIGHT SEARCH APPROVED: YES ( ) NO (X)

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Bergdorf Goodman/ Nieman Marcus, Randy Vines/ Attn: Custodian of Records, 1201 Elm Street, Suite 1900, Dallas, TX 75270.

For the following: Refer to attachment "A"

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this **23rd day of September, 2004**, at **1:25 A.M./P.M.** Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division



## ATTACHMENT "A"

1. Documentation held by **Bergdorf Goodman/ Nieman Marcus** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by, or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Bergdorf Goodman/ Nieman Marcus**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and including [REDACTED] **mjfacts.com**. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Bergdorf Goodman/ Nieman Marcus** including bank names, account numbers and if possible, any captured images of checks sent to **Bergdorf Goodman/ Nieman Marcus**, during [REDACTED]. If the account holder/ user did not send monies to **Bergdorf Goodman/ Nieman Marcus** during [REDACTED], then the requested payment information should be for the next closest date.

**Account numbers:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/s/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony.

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Capital One Bank Attn: DARE, 11011 W. Broad Street, Glenn Ellen, VA 23260

For the following:

1. Documentation held by Capital One Bank pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by Capital One Bank, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and including [REDACTED] 03. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to Capital One Bank including bank names, account numbers and if possible, any captured images of checks sent to Capital One Bank, during [REDACTED]. If the account holder/ user did not send monies to Capital One Bank during [REDACTED], then the requested payment information should be for the next closest date.

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 AM/P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/s/ Rodney S. Melville

(Signature of Magistrate)

Judge of the Santa Barbara Superior Court, Santa Maria Division

NIGHT SEARCH APPROVED: YES ( ) NO (X)

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
 SANTA BARBARA JUDICIAL DISTRICT  
**SEARCH WARRANT AND AFFIDAVIT  
 (AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Chevron/ Standard Oil CA, Attn Legal Compliance. P.O. Box 5010, Concord, CA 94524

For the following:

1. Documentation held by **Chevron** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Chevron**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and including [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Chevron** including bank names, account numbers and if possible, any captured images of checks sent to **Chevron**, during [REDACTED]. If the account holder/ user did not send monies to **Chevron** [REDACTED], then the requested payment information should be for the next closest date.

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division



STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Federated Department Stores (Bloomingdale's/ Macys) FACS Group, Department C, P.O. Box 8053, Mason, OH 45040, Fax: 513-573-2898

For the following: Refer to attachment "A"

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)


Judge of the Santa Barbara Superior Court, Santa Maria Division



**ATTACHMENT "A"**

1. Documentation held by **Federated Department Stores (Macy's / Bloomingdales)** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by, or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Federated Department Stores (Macy's / Bloomingdales)**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Federated Department Stores (Macy's / Bloomingdales)** including bank names, account numbers and if possible, any captured images of checks sent to **Federated Department Stores (Macy's / Bloomingdales)**, during [REDACTED]. If the account holder/ user did not send monies to **Federated Department Stores (Macy's / Bloomingdales)** during [REDACTED], then the requested payment information should be for the next closest date.

**Account numbers:**



STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ **Craig Bonner**

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony.

**YOU ARE THEREFORE COMMANDED TO SEARCH:** **Bank One/First USA Bank Attn: Terri Richardson/ Custodian of Records, 800 Brookedge Blvd., Westerville, OH 43081-9747**

For the following:

1. Documentation held by **Bank One/First USA Bank** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Bank One/ First USA Bank**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Bank One/ First USA Bank** including bank names, account numbers and if possible, any captured images of checks sent to **Bank One/ First USA Bank**, [REDACTED]. If the account holder/ user did not send monies to **Bank One/ First USA Bank**, [REDACTED], then the requested payment information should be for the next closest date.

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this **23rd day of September, 2004**, at **1:28 A.M./P.M.** Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ **Rodney S. Melville**

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
 SANTA BARBARA JUDICIAL DISTRICT  
**SEARCH WARRANT AND AFFIDAVIT**  
**(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/s/ **Craig Bonner**

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony.

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Fleet Credit Card Services, Attn Custodian of Records, 680 Blair Mill Road, Horsham, PA 19044

For the following:

1. Documentation held by **Fleet Credit Card Services** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Fleet Credit Card Services**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Fleet Credit Card Services** including bank names, account numbers and if possible, any captured images of checks sent to **Fleet Credit Card Services**, during [REDACTED]. If the account holder/ user did not send monies to **Fleet Credit Card Services** during [REDACTED], then the requested payment information should be for the next closest date.

1. [REDACTED]

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:25 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/s/ **Rodney S. Melville**

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division



STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/s/ **Craig Bonner**

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** MBNA America, Attn: Law Department/ Custodian of Records, 1100 North King Street, Wilmington, DE 19850.

For the following:

1. Documentation held by MBNA America pertaining to any personal, business, and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by MBNA America, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to MBNA America including bank names, account numbers and if possible, any captured images of checks sent to MBNA America, during [REDACTED]. If the account holder/ user did not send monies to MBNA America during [REDACTED], then the requested payment information should be for the next closest date.

1. [REDACTED]

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:28 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/s/ **Rodney S. Melville**

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division



STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
 SANTA BARBARA JUDICIAL DISTRICT  
**SEARCH WARRANT AND AFFIDAVIT**  
**(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/S/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

**YOU ARE THEREFORE COMMANDED TO SEARCH:** GE Consumer Card Services (Mobil Gas card), Attn: Custodian of Records, PO Box 8406, Mason, OH 45040

For the following:

1. Documentation held by Mobil Credit Card/ GE Consumer Card Services pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by Mobil Credit Card/ GE Consumer Card Services, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question between and [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to Mobil Credit Card/ GE Consumer Card Services including bank names, account numbers and if possible, any captured images of checks sent to Mobil Credit Card/ GE Consumer Card Services, during [REDACTED]. If the account holder/ user did not send monies to Mobil Credit Card/ GE Consumer Card Services during [REDACTED], then the requested payment information should be for the next closest date.

1. [REDACTED]

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 23rd day of September, 2004, at 1:30 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/S/ Rodney S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

Warrant page 1

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA  
SANTA BARBARA JUDICIAL DISTRICT**SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/s/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ( ) NO (X)

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony.

**YOU ARE THEREFORE COMMANDED TO SEARCH:** Nordstroms Card Services, Attn: Custodian of Records, P.O. Box 6589, Inglewood, CO 80155.

For the following: Refer to attachment "A"

**AND TO SEIZE IT IF FOUND** and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this **23rd day of September, 2004**, at **1:25 AM**/P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/s/ Rodney S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES ( ) NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

## ATTACHMENT "A"

1. Documentation held by **Nordstroms** pertaining to any personal, business and corporate credit, loan or banking account/s associated with the below listed account number and/ or held by, or associated with the below described person/s, including copies of application forms, current account holder/ business information and any other information/ documentation held by **Nordstroms**, which could be used to accurately identify the person(s) who own and/ or use the accounts in question (such as lists of authorized users).
2. Copies of detailed account statements, which document activity (including all purchases, payments, deposits, withdrawals and transfers of money) involving the below listed/ described account/s in question [REDACTED]. The indicated detail should include any dates, times and locations associated with transactions.
3. Information pertaining to the means by which the account holder/ user paid funds to **Nordstroms** including bank names, account numbers and if possible, any captured images of checks sent to **Nordstroms**, [REDACTED]. If the account holder/ user did not send monies to **Nordstroms** [REDACTED], then the requested payment information should be for the next closest date.

### **Account numbers:**

[REDACTED]

[REDACTED]

[REDACTED]

**STATEMENT OF PROBABLE CAUSE****Identification and Expertise of Affiant:**

Your Affiant, Craig Bonner has been regularly employed by the Santa Barbara County Sheriff's Department for over ten years. Your Affiant has worked as a peace officer in the State of California for the same period. During this time period, your Affiant has investigated hundreds of various offenses including murder, robbery, burglary, theft, assault, narcotic and drug violations, sex crimes, physical and sexual child abuse, and traffic investigations. As the result of these investigations, your Affiant has made hundreds of arrests for the various crimes.

Your Affiant attended a level two and three reserve police academy at Allan Hancock College. Your Affiant also attended the basic law enforcement training academy while employed by the Santa Barbara County Sheriff's Department. Your Affiant possesses the Basic and Intermediate P.O.S.T. Certificates, and regularly attends in-service training. Your Affiant attended a 28 hour training seminar on the investigation of property and financial crimes. This seminar included instruction blocks on credit card fraud, Identity Theft and Internet fraud. I have also attended a 32 hour Internet Crimes class and a 36 hour High Technology and Computer Crimes Investigation class. Since assuming my current assignment as a detective, I have personally investigated in excess of one hundred property/ financial crime cases.

Your Affiant is currently assigned to the Criminal Investigations Division, as a detective, and have acted and received the information set forth in this declaration in that capacity.

**Statement of Probable Cause:****Synopsis:**

Your Affiant is attempting to obtain documentation which can be used

**Background:**

Your affiant has read the search warrant and affidavit executed on November 17, 2003, in support of a search warrant (No. SW8844686) for Neverland Ranch, the residence of [REDACTED] (Los Angeles County) and the office of Bradley Miller, a private investigator in Beverly Hills, California and is incorporating this information within this statement of probable cause by this reference. Additionally, SBSO investigators have authored a number of search warrants subsequent to the above mentioned warrants. Your affiant personally authored, assisted in the authoring of, or read each of the statements of probable cause for the subsequent warrants. Your affiant wishes to incorporate the information contained within the probable cause statements for these earlier warrants into this current statement of probable cause by this reference.

**New information:**

Your affiant recently authored search warrants for the three main credit reporting agencies; Equifax, Transunion and Experian. The warrants required the credit reporting agencies to provide information pertaining to credit accounts associated [REDACTED]. The warrants were reviewed and signed by Judge



Rodney Melville on 08-20-2004. The search warrants were assigned control numbers as follows: Transunion - 5118, Experian - 5119 and Equifax - 5120. Your affiant served the warrants on the respective companies.

As of 09-13-2004, your affiant finished receiving the requested materials from each of the three credit reporting agencies. Your affiant analyzed the information contained within the reports and determined what accounts were associated with each of the involved parties / conspirators. Your affiant took this one step further and determined which accounts were active during, or near (within a couple months) [REDACTED]. Your affiant prepared a list of credit issuing agencies, their contact address and telephone numbers (when provided), the account number in question and the person whom the account was associated with. This list is attached to this report as Attachment I. The list includes credit card companies, banks which issue credit cards, and department stores which issue credit.

Additionally, while conducting a search of [REDACTED], SBSO investigators located an [REDACTED]. The contact entry listed an American [REDACTED].

One of the means by which criminal investigators can establish an individual's whereabouts during a given time period is by analyzing the individual's banking and credit card activity during the time in question. Bank and credit card statements usually list the date and location of transactions on the account. For example, when an individual uses an ATM card to deposit or withdraw monies from a bank, the account statement will list date and location (at minimum the city) of the ATM used by the individual. Similarly, when an individual uses a credit card to make a purchase, the account statement will detail the date and location where the purchase was made. SBSO investigators would like to use this banking and credit account activity data, in conjunction with telephone toll records, [REDACTED].

Furthermore, in reviewing the above noted credit reports, your affiant [REDACTED].

[REDACTED] will provide investigators with information pertinent to this investigation. In speaking with the various credit issuing companies listed on Attachment I, your affiant learned many of the companies can provide documentation (such as copies of checks) pertaining to the means by which the party in question paid their debts to the credit issuing company. Your affiant is therefore asking the credit issuing agencies be compelled to release information pertaining to the means by which the account holder paid his / her debts to the company [REDACTED] (or the closest date if no payments were made in these two months). Your affiant will use this information to identify banking institutions where [REDACTED].

[REDACTED] Your affiant will then seek search warrants compelling the banking institutions to release information pertaining to activity in the target accounts [REDACTED].

It is your affiant's training and experience that credit issuing companies and banks will not release credit and banking documentation pertaining to an individual, or a business entity, unless directed to do so by a court order. Your affiant contacted each of the banks / credit issuing companies listed on Attachment I and obtained information about serving each company with a search warrant. It should be noted most of the companies requested the warrants be sent to the addresses, which were different than those listed on the credit reports and Attachment I.

#### Warrant Mechanics:

Your Affiant commenced the actual physical mechanics of preparing this affidavit and attached search warrant at 10:30 A.M. on September 20, 2004; and your affiant affixed his signature under oath to this affidavit before the undersigned magistrate at the time and date attested by said magistrate; the elapsed time reflected herein has been diligently utilized by your affiant in the mechanics of physically preparing these documents, located and consulted with Deputy District Attorney Gerald Franklin of the County of Santa Barbara, in reference to the aforementioned preparation; locating the appropriate magistrate; and transporting these documents to the magistrate for his official action in connection therewith.



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com