

IN THE CIRCUIT COURT THIRD JUDICIAL CIRCUIT MADISON COUNTY, ILLINOIS

CLERK OF CIRCUIT COURT #31
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOISCOMPLAINT FOR SEARCH WARRANT

Warrant to search the following described item(s):

18MR500117

Detective Jeffrey Donahey, COMPLAINANT, now appears before the undersigned Judge of the Circuit Court of the Third Judicial Circuit of Illinois, and requests the issuance of a Search

Data within computers and/or servers located at the Madison County Administration building located at 157 N. Main St. in Edwardsville, Illinois, 62025 and the Madison County Sheriff's Office, 405 Randle St., Edwardsville, Illinois 62025, which includes the browsing of accounts associated to Robert Dorman, Doug Hulme, Steve Adler to include folder/directory structure within the servers, to also include browsing of user activity and user associated logs (logs includes, file activity logs, logins, IP logs, associated hardware and MAC address logs, etc.), browsing of any virtual environment activity to also include snapshots, any email associated logs or associated email accounts, any internet related activity reports and with respect to the aforementioned browsing activity also allow the designee conducting the browsing to video, screenshot, capture, export, or digitally seize any files of evidentiary value

and make return thereof according to law, the following property or things:

any or all photographs, digital images, videos, documents, e-mails, databases, internet related files, which may contain information about any activity conducted or used in the commission of or which may constitute evidence of the offense(s) in connection with which this warrant is issued, being a 720 ILCS 5/17-51 Computer Tampering, 720 ILCS 5/33-1 Bribery, 720 ILCS 5/14 Violation of Article 14: Eavesdropping Statute and 720 ILCS 5/33-3 Official Misconduct.

The following facts having been sworn to by Complainant in support of the issuance of this Warrant. (See attached Affidavit, which is, in its entirety, made a part of this Complaint for search warrant by incorporation, and express reference.)

WHEREFORE, your Complainant requests that the Court issue a Search Warrant directing a

search for and seizure of the property described above at the premises described above.

	Och. Jeff Sona key #227
20	Subscribed and sworn to before me on this
	Judge Judge

JAN 2 5 2018

STATE OF ILLINOIS)	
)	SS
COUNTY OF MADISON)	

CLERK OF CIRCUIT COURT #31
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

18mR500117

AFFIDAVIT

- I, Detective Jeffrey Donahey, do hereby state and affirm as follows:
- 1. I have been a sworn peace officer in this State since 1996. I am employed as a Detective with the Granite City Police Department. I have received training related to cellular phone forensics.
- 2. The statements contained in this affidavit are either based upon my investigation, information reported to me, information provided by other investigators, other personnel specially trained in the seizure and analysis of computers and electronic media, and on my experience and training as an Officer with the Granite City Police Department. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.
- 3. It is my belief that any number of items sought in this affidavit may be found which were stored electronically. Based on my experience and training, I know that electronic files can be easily moved from one computer or electronic storage medium to another. Therefore, electronic files downloaded to or created on one computer can be copied on or transferred to any other computer or storage medium at the same location. In addition, based upon my experience and training, I know that searching computerized information for evidence of crimes often requires investigators to seize most or all computer equipment. This is true based on the following:
 - a. Volume of evidence: Electronic media and storage devices such as hard disks, CD-ROMs, DVDs, diskettes, tapes and laser disks can store the equivalent of thousands of pages of information. Additionally, a suspect may try to conceal criminal evidence by storing it in random order with deceptive file names. This may require searching authorities to examine all of the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks to months, depending on the volume of data stored. It would also be impractical to attempt this type of data search on site.
 - b. Technical requirements: Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert and examiner is qualified to analyze the system and it's data. In any event, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password protected, or encrypted files. Since computer evidence is vulnerable to inadvertent or intentional modification or destruction (either from external sources or from destructive code

- embedded in the system such as a "booby traps"), a controlled environment is essential to its complete and accurate analysis.
- c. The analysis of electronically stored data, whether performed on site or in a laboratory or other controlled environment, may entail any or all of several different techniques. Such techniques may include, but shall not be limited to, surveying various file "directories or folders" and the individual files they contain (analogous to looking at the outside of a file cabinet for the pertinent files, in order to locate the evidence and instrumentalities authorized for seizure by the warrant); "opening" or reading the first few "pages" of such files in order to determine their precise contents; "scanning" storage areas to discover and possibly recover recently deleted data; scanning storage areas for deliberately hidden files; or performing electronic "keyword" searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are intimately related to the subject matter of the investigation.
- d. In order to search a server efficiently and without disruption of service or critical infrastructure, one must be versed on the technical layout and mapping structure of a server and its configuration. Traditional methods of imaging and/or capturing files from a server may not be beneficial and could be destructive to the owner of said property. Furthermore, servers exist to provide individuals and entities a valuable asset for a vast array of computer needs; therefore, it is imperative to exercise due caution while conducting file browsing upon servers. Due to the sensitivity of this infrastructure and to avoid any disruption of service, assistance from a technical expert versed on the specific network is needed.
- Electronic files downloaded to a hard drive can be stored for years at little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily available forensic tools. When a person "deletes" a file on a computer, the data contained in the files does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space, that is, in space on the hard drive that is not allocated to an active file or that is unused after a file has been allocated to set a block of storage space for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a "swap" or "recovery" file. Similarly, files that have been viewed via the Internet are automatically downloaded into a temporary Internet directory or "cache". The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with ore recently viewed Internet pages. Thus, the ability to retrieve residue of an electronic rile from a hard drive depends less on when the files downloaded or viewed that on a particular user's operating system, storage capacity, and computer habits.
- 4. On January 4th, 2018, I was notified of a complaint from the State's Attorney's Office regarding possible illegal activity including violations of 720 ILCS 5/17-51 Computer Tampering, 720 ILCS 5/33-1 Bribery, 720 ILCS 5/14 Violation of Article 14: Eavesdropping Statute and 720 ILCS 5/33-3 Official Misconduct. Specifically, I was informed that two individuals identified Lisa Ciampoli and Chris Slusser provided Grand Jury testimony relating the aforementioned charges. Both individuals are elected officials and associated to the Republican Party.

- 5. Lisa Ciampoli provided information surrounding improper activity when she filed petitions for precinct committee person while at the front desk of the County Clerk's Office. She indicated that seconds after she arrived at the counter, and individual by the name of Robert Dorman confronted her and interfered with her filing of the petition. She provided details that Dorman's father was also running for the same position against her that she was filing paperwork for. Robert Dorman is employed as the Madison County Information Technology (IT) director and was appointed by the Chairman of the County Board, Kurt Prenzler sometime around December of 2016. During her encounter with Dorman, Dorman tried to swipe the paperwork out of her hands. This information was corroborated by video surveillance footage from Madison County cameras. In addition, she was suspicious about how Dorman knew she was filing the paperwork at that time and believed he was monitoring her whereabouts on Madison County cameras during working hours within the administration building. A subsequent FOIA (Freedom of Information Act) request was filed by Dorman's father for this video footage. Lisa Ciampoli is an elected official and serves as a Madison County Board member.
- 6. Chris Slusser, the elected Madison County Treasurer, testified that in February of 2017 a Madison County employee by the name of Doug Hulme bragged about having evidence of a circuit judge using county resources for political fundraising. Doug Hulme is employed as the Madison County Administrator and was appointed by Kurt Prenzler. When Slusser confronted Hulme on how he obtained this evidence, he alluded that they have access to everyone's emails and performed keyword searches and found them. He touted about saying how they had enough evidence to force this judge to resign. Slusser indicated that this activity made him feel uncomfortable. He subsequently reported this to the Federal Bureau of Investigation. Hulme also said sometime around April 2017 that they were going to install new printers and copiers throughout the departments and Rob Dorman will be able to monitor the internal hard drives to see what everyone is printing. Hulme also made a comment about having GPS devices on all county vehicles so Dorman can monitor them. Slusser was also told about an incident involving Deb Detmers who was the deputy chief of staff for Congressman John Shimkus wanted to schedule a meeting with Kurt Prenzler for a position in his administration. She was supposed to have lunch with Prenzler; however, upon arrival was met by Hulme and Steve Adler. Steve Adler has served in many different positions in Madison County government since Prenzler has been elected to office and is no longer employed in Madison County Government. Hulme and Adler offered her the job on the condition that Congressman Shimkus submit Don Weber's name for the United States Attorney.
- 7. Acting on the aforementioned information, it was apparent that the information was gleaned from reading digital correspondence in the form of emails through Madison County Government servers. The investigation began to surround the infrastructure and history of the Madison County computer servers. It also created the appearance that unauthorized access to Madison County emails accounts were also done without proper authority or in excess of the authority granted to him/her.
- 8. It was determined the best course of action without compromising the integrity of the investigation would be to interview individuals who were familiar with the network

and/or servers. Due caution was exercised not to alert current employees of the IT staff; therefore, previous employees were interviewed that were familiar with the network due to the sensitive nature of the case.

- 9. Thomas Hall, who served as the System Administrator over the network until around June of 2017, reported suspicious actions on behalf of Robert Dorman and orders that he was given by Robert Dorman. Specifically, Hall indicated that when Dorman was appointed at the director of IT, he was told to give Steve Adler and Doug Hulme full access to all email accounts of any employee within the county. He said this was never a past practice. He indicated that he was given hand written notes in the form of "index" cards from Dorman to pull emails account from the dates of their inception until the date requested for Frank Miles, Timothy Renick, Jeff Kochan, Barry Harris, Dave Stricklin, Joe Parente, and Alan Dunstan (phonetic spelling and pronunciation). These individuals were all employed or previously employed in Madison County Government. Steve Adler left Madison County government sometime around May of 2017. Typical protocol would be to deactivate the email account and access to the network according to Hall and past practice; however, Dorman told him to keep it active which he found highly unusual. He was also told to coordinate and/or instruct Hulme and Alder how to operate the mail store server application and show them how to use it.
- 10. Kyle Kielty who also served as the system engineer over the network until around June of 2017, gave similar accounts to Thomas Hall's statement indicating that he had knowledge of Dorman giving index card to Hall to pull email accounts. He also indicated he installed the mail store server application on Hulme's and Adler's computer and showed them how to use it.
- 11. Jeff Kochan was also interviewed and served as the deputy director of IT until around June of 2017. He was also handed index cards by Rob Dorman and ordered to obtain full email accounts. One name was Matt Jones (phonetic spelling and pronunciation). Kochan said he was also asked to pull emails from other individuals at the direction of Robert Dorman within Madison County Government but couldn't recall their names. Kochan indicated that he observed a web history audit of Jennifer Zolzer's activity on Dorman's computer. Kochan advised that he later spoke to Zolzer and confirmed that no one in the Auditors Office to include Madison County Auditor Rick Faccin never requested a web history search of her activities. Kochan also corroborated Hall's statement about keeping Adler's account open and active which violated standard procedure.
- 12. Additional interviews were conducted, to include a current employee of the Madison County Information Technology staff, who told investigators that he currently has full administrative domain rights and is familiar with the network. The employee advised that he can remotely access the network and provide account related information.
- 13. Information can be gleaned from within the network through directory and file structure browsing, account related logs and server logs to indicate whether or not certain accounts are still active and what activity is occurring within the accounts. It can also serve as a tool to determine the location of a specific computer and the office that it may reside

within. In addition, by logs and viewing the architecture within the network may also serve to determine which individual was associated to specific files, data, or computers. Emails previously accessed as indicated by witnesses commonly contain juvenile information, privileged information, legal, and/or law enforcement sensitive information thereby establishing proper ownership of such information prohibited by law and should not be distributed or accessed by individuals without proper authority.

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Subscribed and sworn to before me on this _	day of _	5AN.	2018
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IN THE CIRCUIT COURT THIRD JUDICIAL CIRCUIT MADISON COUNTY, ILLINOIS

18MR500117

SEARCH WARRANT

ALL PEACE OFFICERS OF THE STATE OF ILLINOIS, SPECIAL AGENTS OF THE UNITED STATES GOVERNMENT, AGENTS OF THE FEDERAL BUREAU OF INVESTIGATION, or ANY DESIGNEE DIRECTED FROM A PEACE OFFICER AND/OR FEDERAL SPECIAL AGENT:

This day, Detective Jeffrey Donahey, having subscribed and sworn to Complaint for Search Warrant, I have under oath examined the Complainant, and am satisfied that probable cause exists.

THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF ILLINOIS, I command that you search the following described item(s):

Data within computers and/or servers located at the Madison County Administration building located at 157 N. Main St. in Edwardsville, Illinois, 62025 and the Madison County Sheriff's Office, 405 Randle St., Edwardsville, Illinois 62025, which includes the browsing of accounts associated to Robert Dorman, Doug Hulme, Steve Adler to include folder/directory structure within the servers, to also include browsing of user activity and user associated logs (logs includes, file activity logs, logins, IP logs, associated hardware and MAC address logs, etc.), browsing of any virtual environment activity to also include snapshots, any email associated logs or associated email accounts, any internet related activity reports and with respect to the aforementioned browsing activity also allow the designee conducting the browsing to video, screenshot, capture, export, or digitally seize any files of evidentiary value

and there to seize, secure, analyze, tabulate and make return thereof according to law, the following property or things:

any or all photographs, digital images, videos, documents, e-mails, databases, internet related files, which may contain information about any activity conducted or used in the commission of or which may constitute evidence of the offense(s) in connection with which this warrant is issued, being a 720 ILCS 5/17-51 Computer Tampering, 720 ILCS 5/33-1 Bribery, 720 ILCS 5/14 Violation of Article 14: Eavesdropping Statute and 720 ILCS 5/33-3 Official Misconduct

The following facts have been sworn to by Complainant in support of the issuance of this Warrant. (See attached Complaint for Search Warrant, which is made a part of this Search Warrant by incorporation and express reference).

ISSUED AT MADIS	ON COUNTY, ILLING	IS, UNDER MY H	IAND	THIS		
S DAY OF	JAN		AT	THE	HOUR	OF
9:42 P.M.						

JUDGE

RETURN

SS

STATE OF ILLINOIS)

COUNTY OF MADISON



CLERK OF CIRCUIT COURT #31 THIRD JUDICIAL CIRCUIT MADISON COUNTY, ILLINOIS

18 MR 500117

I, Detective Jeff Donahey, have executed the within Search Warrant by searching the within described item(s) located on the Madison County network server located at the address of 157 N. Main St. and 405 Randle St., Edwardsville, Illinois, this 5th day of January, 2018, at the approximately time of 10:00 p.m., and seizing the following property, to-wit:

See attached records of computer hardware information and log file information and by leaving a duplicate copy of the within Search Warrant with the property owner, Kurt Prenzler;

all in accordance with the provisions of Article 8 of the

Code of Criminal Procedure of 1963.

Affiant

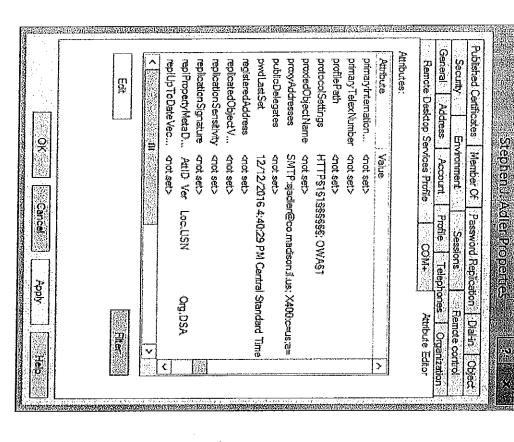
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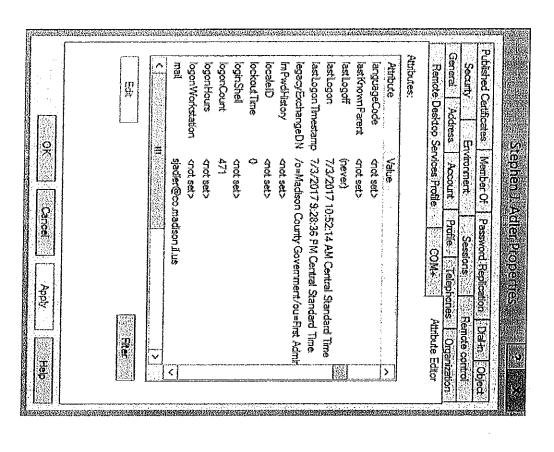
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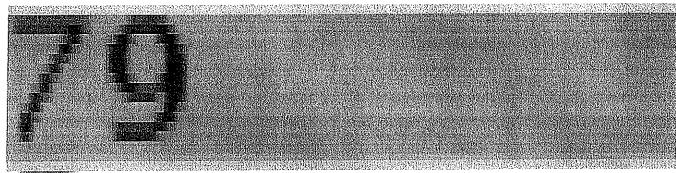
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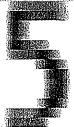
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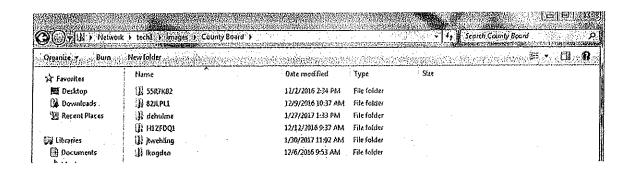


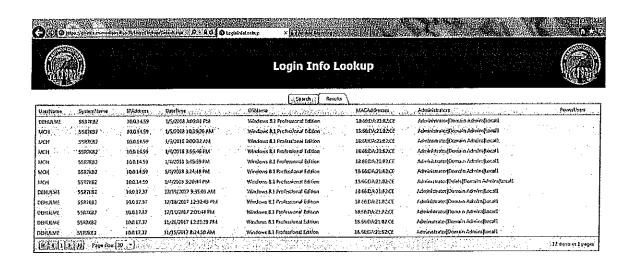


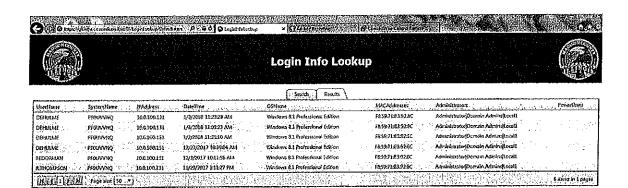


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