

Maricopa County Superior Court
County of Maricopa, State of Arizona

Search Warrant

Warrant # SW 2015-016791

To Any Peace Officer in the State of Arizona:

Proof by affidavit having been made this day before me by Special Agent Madison MacDonald #402, that there is probable cause to believe that the hereinafter described property or persons, presently located within the hereinafter described location, is connected with the commission of the following public offenses:

1. A.R.S. § 13-2308 [Participating in or assisting a criminal syndicate];
2. A.R.S. § 13-2310 [Fraudulent Schemes & Artifices];
3. A.R.S. § 13-2312 [Illegal Control of an Enterprise, and/or Conducting an Enterprise];
4. A.R.S. § 13-2317 [Money laundering]; and
5. A.R.S. § 13-1802 [Theft].

You are therefore commanded in the (x) daytime, () or in the night according to A.R.S. 13-3917 to make a search:

1. On the premises and curtilage known as: 6841 W. Catalina Dr., Phoenix, Arizona, more particularly described as follows:
 - A brown, one story residence located on the south side of W. Catalina Dr., in which the main entrance faces in a northerly direction; the residential number 6841 appear affixed to the top of the carport to the west of the main entrance.
2. On the premises and curtilage known as: 4307 N. 21st Dr., Unit #3, Phoenix, Arizona, more particularly described as follows:
 - A small residential apartment/condominium located on the eastside of North 21st Drive, in which the main entrance faces in a western direction; number 3 appears to the north of the front door of the main entrance. This apartment/condominium is located on the second floor of a two story complex.
3. On the following vehicles, more particularly described as follows:

- A 2001 black in color Chevrolet Tahoe, bearing Arizona license plate [REDACTED] VIN 1GNEK13T6LR [REDACTED] registered to Courtney Jermaine Hamilton 6841 W. Catalina Dr. Phoenix, AZ 85033.
 - A 2000 white in color Lincoln Navigator, bearing Arizona Freedom license plate [REDACTED] VIN 5L MFU28A2 [REDACTED] registered to Courtney Jermaine Hamilton 6841 W. Catalina Dr. Phoenix, AZ 85033.
4. On the person of Courtney Jermaine Hamilton, a black male with a date of birth [REDACTED] who is approximately 6'02" and 300 lbs., has brown eyes and black hair, who is known to reside at 6841 W. Catalina Dr., in Phoenix, Arizona.
5. In/on the digital media/storage device described as:
- Volatile electronic data (Random Access Memory and dynamic cache repositories) related to desktop computers, laptop computers, server-based computers, and mobile devices which are powered on at the time seized, for information including but not limited to hardware identification, user account information, recorded passwords, network connections, running applications and processes; captured to government removable media via specialized acquisition software, to be examined and analyzed at a later date by forensic expert(s).
 - Persistent electronic data storage devices and consoles related to desktop computers, laptop computers, server-based computers, and mobile devices, including but not limited to any and all internal hard drives, external hard drives, USB flash drives, cellular mobile devices, wireless access point (Wi-Fi) capable mobile devices, digital camera/camcorder memory and removable media cards, magnetic tape cartridges, optical disks, legacy floppy drives, and embedded systems such as personal multimedia players, DVR systems, navigation systems, and video game consoles, to be examined and analyzed at a later date by forensic expert(s).
 - Stored electronic communications and subscriber information stored on local media and/or remote and/or "cloud" storage media sites and commercial Internet Service Providers, including but not limited to:
 - Subscriber information related to the Internet Service Providers (ISPs) for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton;
 - Text Message streams and/or logs (SMS and/or MMS);
 - Stored and/or archived email messages;
 - Chat logs and/or instant message (IM) conversation streams and/or logs;
 - Attached, linked, embedded, or saved files (documents, pictures, videos, audio files, etc.);
 - Contact lists, friend lists, follower lists, subscriber lists, and/or address books;
 - Registered associated domain names and assigned IP address(es);
 - Shopping cart, bank statements, and/or financial transaction logs, and
 - Customer and/or affiliate captured IP logs.

In the County of Maricopa, State of Arizona, where there is certain property, persons or things, possessed or concealed, which:

1. Constitutes evidence tending to show that a public offense has been committed, or tending to show that Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton, have committed the offense(s);

that said property, persons or things are described as follows:

- Offering documents, scripts, or any other information provided to consumers pertaining to any of the above named individuals or entities, to include sales contracts, promissory notes, short term notes, loan agreements, joint venture agreements, limited partnerships, sales proposals, and stock certificates.
- Leads lists, call logs, or any documents identifying consumers, the amount they submitted, and/or what they purchased/sold any of the above named entities and sales instruments.
- Any and all correspondence between Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton, and consumers or prospective consumers in any of the above named entities and sales instruments.
- Cash, cashier's checks, checks, money orders, and any evidence of transactions.
- Bank records, including cancelled checks, receipts of deposit or withdrawal, and bank statements in the name of or under the signatory power of Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton.
- All accounting records and books of original entry, including cash receipts journals, cash disbursements journals, general journals, general ledgers, subsidiary ledgers, trial balances, accounts payable journals, accounts receivable journals, and expense records pertaining to Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton.
- All financial statements, projections, forecasts, and budgets with accompanying footnotes, explanations, assumptions, justifications, recommendations, comments, and auditor's opinions pertaining to Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton.
- Brochures, prospectuses, advertising materials, program descriptions, or other information provided to current or prospective consumers for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, and/or Courtney Jermaine Hamilton.

- Federal and State tax records, including income tax returns, Tesla Media Developments, LLC; Paradigm Unlimited Enterprises, LLC; John Evans, and/or Courtney Jermaine Hamilton.
- All documents pertaining to any of the above named entities and/or sales instruments, including letters, memos, notes, proposals, agreements, projections, estimates, and contracts.
- Videotapes, audio tapes, and/or any other form of sound or video reproduction, except radios and televisions, which relate to any of the above named entities, consumers, potential consumers, lenders, guarantors, and joint venture partners.
- Employee records or documents pertaining to independent contractors working for Tesla Media Developments, LLC; Paradigm Unlimited Enterprises, LLC; John Evans, and/or Courtney Jermaine Hamilton.
- Telephone bills, call logs, business cards, credit card bills or receipts, message books, rolodexes, handwritten notes, and appointment books for Tesla Media Developments, LLC; Paradigm Unlimited Enterprises, LLC; John Evans, and/or Courtney Jermaine Hamilton.
- Any other documents tending to show a relationship between Tesla Media Developments, LLC; Paradigm Unlimited Enterprises, LLC; John Evans, and/or Courtney Jermaine Hamilton.
- Electronic data processing and storage devices, cellular phones, smart phones, hard disk drives, computer and computer systems, including central processing units; internal and peripheral storage devices, such as fixed disks, external hard disks, floppy disk drives and diskettes; tape drives and tapes, optical storage devices or other memory storage devices; peripheral input/output devices, such as keyboards, printers, video display monitors, optical readers, and related communications devices, such as modems, facsimile machines, telephone equipment with built-in memory devices, and answering machines, together with system documentation, operating logs and documentation, software and instruction manuals. All of the above records, whether stored on paper, on magnetic media, such as tape, cassette, disk, diskette, or on memory storage devices, such as optical disks, programmable instruments, such as telephones, electronic address books, calculators, or any other storage media, together with indicia of use, ownership, possession or control of such records.
- Indicia of ownership for the residence(s) and vehicle(s).

And if you find such or any part thereof, seize it, leaving a copy of this warrant and a receipt for the property taken, and prepare a written inventory of the property seized and promptly return this warrant and list of the property seized, to the Maricopa County Superior Court and retain the seized items as required by law according to A.R.S. 13-3920.

HEREIN FAIL NOT but of this writ make due return within three (3) days of the date thereof, as law directs in A.R.S. 13-3918.

Given under my hand and dated this 20th day of Nov, 2015,

Virginia Richter
Honorable Virginia Richter

Judge

Superior

Court

Arizona Superior Court
Affidavit for Search Warrant
County of Maricopa, State of Arizona

SW No. 2015-016091

YOUR AFFIANT, MADISON MACDONALD, A PEACE OFFICER IN THE STATE OF ARIZONA, BEING DULY SWEORN, UPON OATH, DEPOSES AND SAYS:

1. From at least March 13, 2013, to present, in the County of Maricopa, State of Arizona, probable cause exists to believe that the crime of Fraudulent Schemes and Artifices, A.R.S. 13-2310, has been committed by Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and others as yet unknown.
2. From at least March 13, 2013, to present, in the County of Maricopa, State of Arizona, probable cause exists to believe that the crime of Illegal Control of an Enterprise, A.R.S. 13-2312, has been and is being committed by Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and others as yet unknown.
3. From at least March 13, 2013, to present, in the County of Maricopa, State of Arizona, probable cause exists to believe that the crime of Theft, A.R.S. 13-1802, has been and is being committed by Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and others as yet unknown.
4. From at least March 13, 2013, to present, in the County of Maricopa, State of Arizona, probable cause exists to believe that the crime of Money Laundering, A.R.S. 13-2317, has been and is being committed by Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and others as yet unknown.
5. From at least March 13, 2013, to present, in the County of Maricopa, State of Arizona, probable cause exists to believe that the crime of Participating in a Criminal Syndicate, A.R.S. 13-2308, has been and is being committed by Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and others as yet unknown.

OFFICER'S TRAINING & EXPERIENCE

I, Madison MacDonald, am a fully certified Arizona Peace Officer with over 700 hours of training. I am currently employed as a Special Agent with the Arizona Attorney General's Office Criminal Division, Special Investigations Section, where I'm assigned to a Major Fraud Unit and have been so for approximately 1 year and 8 months. During my employment, I've conducted and participated in numerous types of investigations to include fraudulent schemes

and artifices, thefts, and forgeries. I have also assisted other agents on several search warrants for vehicles, businesses, and residences.

As part of my investigative duties, I develop, obtain, record, and secure evidence and other documents, and memorialize actions and pertinent conversations, including witness and victim interviews. I initiate investigations based on complaints or inquiries from the public, review investigative files, and initiate proactive investigations. I also assist in the preparation of legal documents, which includes subpoenas, affidavits, and criminal reference reports.

Since I have been employed at the Arizona Attorney General's Office, I have expanded my expertise in fraudulent schemes and artifices investigations, by consulting with other investigators/agents and with attorneys, both within my agency and outside of my agency, as well as various training seminars.

I'm also a current member of the International Association of Financial Crimes Investigators (IAFCI). The IAFCI is a non-profit global organization of fraud investigators from law enforcement agencies, banks, and credit card companies who exchange information and training to suppress and prevent fraud worldwide.

Based upon my training, experience, and participation in investigations involving fraud and other violations of Arizona Revised Statutes Title 13, Criminal Code, and Arizona Revised Statutes Title 44, Trade and Commerce, I know the following:

1. That it is common for those that defraud consumers and others to maintain books, records, receipts, notes, ledgers, airline tickets, receipts relating to the purchase of financial instruments and/or their day to day interaction between them and financial institutions, and notations which tend to demonstrate interplay between co-conspirators, and these are maintained where they have ready access to them, such as their home, office, vehicles, or other locations.
2. That it is common for those that defraud consumers and others to secure documentation of their illicit financial transactions within their residences, businesses, vehicles, or other locations over which they maintain dominion and control of for ready access of their own accounting control and to conceal these items from law enforcement authorities.
3. That it is common for those involved in large scale fraudulent schemes to utilize electronic equipment such as computers, tablets, cellular telephones, telex machines, facsimile machines, currency counting machines, and telephone answering machines to generate, count, store and/or record this information.
4. That it is common for those that defraud consumers and others to maintain evidence pertaining to their illicit enterprise including, but not limited to currency, financial instruments, records of real estate transactions, invoices, receipts, bank statements and related records, passbooks, money drafts, letters of credit, money orders, bank drafts, bank checks, books, records, tax items, and safe deposit keys. These items are

maintained within their residences, businesses, vehicles or other locations over which they maintain dominion and control of.

5. That those individuals that conduct large scale fraudulent schemes that defraud consumers and others commonly maintain addresses or telephone numbers in books or papers which reflect names, addresses and/or telephone numbers of their co-conspirators and those individuals that the illicit enterprise has targeted.
6. That it is common for those that defraud consumers and others to maintain offshore bank accounts wherein they deposit their ill-gotten proceeds in an attempt to conceal those funds from law enforcement authorities and to prevent the seizure of those funds.
7. That it is common for those that defraud consumers and others to utilize personal computers as well as laptop or portable computers, tablets, cellular telephones, and flash drives, which can be transported, used, and stored at their residence, office, vehicles, including motorhomes, or other locations.

During the investigation into this matter, I have learned the following:

1. That from at least March 13, 2013, to present, Tesla Media Developments, LLC, and Paradigm Unlimited Enterprises, LLC, (collectively referred to as "Illegal Enterprises" hereafter") whose sole member is identified as Courtney Jermaine Hamilton, have committed the act of Fraudulent Schemes and Artifices, Illegal Control of an Enterprise, Money Laundering, Theft, and Participating in a Criminal Syndicate, pursuant to an "Advance Fee Scheme," operating under the guise of an illegitimate "Recovery Service," and is soliciting individuals located nationwide and in Canada.
 - a. That according to the Federal Bureau of Investigation (FBI) <https://www.fbi.gov/scams-safety/fraud>, "An advance fee scheme occurs when the victim pays money to someone in anticipation of receiving something of greater value—such as a loan, contract, investment, or gift—and then receives little or nothing in return."
 - b. That according to A.R.S. 44-1271 (1)(14), Recovery Service is defined as follows: "Recovery service" means any business or other practice in which a person represents or implies that the person will recover or assist in recovering for a fee any amount of money that a consumer has provided to a seller pursuant to a telephone solicitation.
2. That the Illegal Enterprises represents to consumers via telephone solicitations that the aforementioned entities will recover or assist in recovering funds from a previous failed telemarketing business venture for a fee.
3. That the Illegal Enterprises has recently conducted business under the entity name of Tesla Media Developments, LLC, (www.teslamdlo.com). That based on an open-source

database inquiry through the Arizona Corporation Commission, Tesla Media Developments, LLC, was incorporated on or about May 20, 2015, and their document number is L20068856. That Courtney J. Hamilton is listed as the Statutory Agent and Sole Member for this entity. That Tesla Media Developments, LLC, is located at 6841 W. Catalina Dr. as well as, 4307 N. 21st Dr., Ste. #3, in Phoenix, AZ. That Tesla Media Developments, LLC, maintains an account at JP Morgan Chase bank, where victims have been told to wire their monies to.

4. That the Illegal Enterprises has also been conducting business under the entity name of Paradigm Unlimited Enterprises, LLC (www.pucelle.com). That based on an open-source database inquiry through the Arizona Corporation Commission, Paradigm Unlimited Developments, LLC, was incorporated on or about September 30, 2005, and their document number is L12328328. That Courtney Hamilton is listed as the Statutory Agent and Sole Member for this entity. That Paradigm Unlimited Enterprises, LLC, is located at 4307 N. 21st Dr., Ste. #3, in Phoenix, AZ. That Paradigm Unlimited Enterprises, LLC, maintains an account at JP Morgan Chase bank and/or Bank of America, where victims have been told to wire their monies to.
5. That in at least one instance, one consumer was contacted by an individual who identified himself as John Evans who claimed to be a "legal aid" who is employed by the Arizona Attorney General's Office. John Evans further represented that the Arizona Attorney General's Office hired Tesla Media Developments' to contact consumers because of their experience in search engine optimization.
6. That according to the Arizona Attorney General's Office Human Resources Information System (HRIS), John Evans is not a current employee of the Arizona Attorney General's Office.
7. Similarly, in a second instance, another consumer was contacted by an individual who identified himself as John Evans as well. John Evans provided the consumer with a "prospectus" document that was generated using Microsoft Office Word. The prospectus document stated that the consumer's internet based business had achieved negative results and fell under the jurisdiction of the Arizona Attorney General's Office. The prospectus further states that funds have been seized as a result of "federal action" and for a small fee of \$29.47, Tesla Media Developments, LLC would be able to refund the consumer \$4,000 (see below prospectus that was emailed to the consumer).

Tesla Media Developments	
A Federal Seizure and Allocation Prospectus	
197 Montezuma Street Phoenix, AZ 85015 TeslaDiv@Yahoocom	
<u>CLIENT INFORMATION:</u>	
NAME:	[REDACTED]
PHONE:	[REDACTED]
AGENT:	John Evans
EMAIL:	[REDACTED]
PRODUCT CODE:	Smart Communication Any Program
SERV. FEE (Client Drawback)	\$1,000.00
TOTAL:	\$259.97 (US\$)

FEDERAL: During an investigation of home business activity it has been found that your account has achieved positive results during the course of an initial business you operate within Arizona. Through our unique interaction, Eye Ace Marketing has not been able to generate some degree of commission over the course of your advertising period. Through fees served at a result of federal action you are eligible for a refund of your initial advertising cost of \$1,000.00, including the initial cost of website development for a total of \$4,000.00. These funds will be deducted to you upon receipt of \$259.97 payment (legal) fees accrued to show business failure as a result of the improper implementation of your advertising program by your affiliate company.

Should you decide the receipt of your generated refund that you would like to continue utilizing the internet to generate revenue, we would like you to know that we employ advertising techniques that work well in bringing exposure of the best selling products online; our company may be able to provide you with space that that have enabled our other clients in your field to see some degree of success. One of our representatives would walk you through the process and make sure you are caught up what it takes to keep the ball rolling. We look forward to a long and prosperous relationship. Thank You and Good Luck!

J.W.E.
Tesla Media Developments, LLC
John W. Evans, Sr. Web Analyst
(602) 819-5400 ext. 17 Sun-Sat

8. That metadata contained within the "Federal Seizure and Allocation Prospectus" specifically referencing the Arizona Attorney General's Office indicates that the origin of the document was last saved by "cj hamilton" on November 9, 2015, at 1516 hours. Upon information and belief, it is believed the above referenced initials stand for Courtney Jermaine Hamilton.
9. That at least 1 complaint was filed with the Better Business Bureau relating to Paradigm Unlimited Enterprises, LLC, on October 13, 2014, and that there were at least 23 complaints filed with the Better Business Bureau relating to Tesla Media Developments, LLC, ranging in dates from March 18, 2013, to August 11, 2015.

11. That Tesla Media Developments, LLC, and Paradigm Unlimited Enterprises, LLC, lists telephone number (623) 849-8660, for their entity's phone number on prospectuses mailed to consumers. According to an inquiry using the TLOxp database, results indicate a "100%" match for a landline associated with Tesla Media Developments, LLC, located at 6841 W. Catalina Dr., Phoenix, AZ 85033.
12. That Courtney Jermaine Hamilton's Arizona driver's license number [REDACTED] lists his residential address as 6841 W. Catalina Dr., Phoenix, AZ 85033.
13. That on May 16, 2014, the domain name Puelle.com was created using the domain registrar and web hosting company Tucowsdomain.com; however, this domain is no longer an active website.
14. That Whois.net (Whois) lets you perform a domain search and search the Whois database for relevant information on domain registration and availability. A Whois lookup identifies the administrator contact information, billing contact, and the technical contact for each domain name listing in the Whois database.
15. That the Whois database indicates the registrant for the Puelle.com domain is Courtney Hamilton 6841 W. Catalina Dr. Phoenix, "CA" (believed to be a typo for "AZ"), as well as the administrative contact and technical contact for this particular domain. The email associated with this domain is paradigmunlimited@yahoo.com.
16. That on June 8, 2015, the domain name Teslamdlc.com was created using the domain registrar and web hosting company Tucowsdomain.com; however, the registrant information is currently private because the website and registrant account is active.
17. That upon review of a digital archive from August 1, 2014, for Puelle.com, using open database source Archive.org (a/k/a "The WayBack Machine"), the Puelle.com website and the current website for Teslamdlc.com, are both generic in nature and appear to contain near identical information relating to content and images contained on the websites. Additionally, both websites indicate that the Illegal Enterprises were allegedly established in 1989; both websites identify the Illegal Enterprises initiative as a "Corporate Consulting Firm, best known for selling advertising to corporations...," and both websites identify affiliate programs with Walmart, BestBuy, and Lowes, as well as links for "Pay per Click," "Google Certified Partner," "Amazon," and "Domain Sale or Transfer," etc.

18. That an employee identified as "John Evans" of Tesla Media Developments, LLC, has made material misrepresentations as to their company's affiliation to the Arizona Attorney General's Office.
19. That from previous training and experience, it is common for those who engage consumers telephonically to use aliases or a "phone name" to conceal their true identity from consumers (e.g. John Evans).
20. That Courtney Jermaine Hamilton, Tesla Media Developments, LLC, nor Paradigm Unlimited Enterprises, LLC, are registered as state approved vendors through the Arizona Department of Administration's State Procurement Office (ADAO-SPO). Similarly, they are not listed in the state procurement system ProcureAZ.gov; nor are they listed in the state accounting system Arizona Financial Information System (AFIS); nor has the Arizona Attorney General's Office ever entered into a contract with Courtney Jermaine Hamilton, Tesla Media Developments, LLC, or Paradigm Unlimited Enterprises, LLC.
21. That Tesla Media Developments, LLC, and Paradigm Unlimited Enterprises, LLC, contact consumers using cellular telephone number (623) 455-1137, and, in at least one instance, this particular phone number is listed on a prospectus emailed to a consumer and the prospectus identified this phone number as the entity's phone number.
22. That on Tuesday, November 17, 2015, surveillance was conducted at 6841 W. Catalina Dr., Phoenix, AZ, to confirm Tesla Media Developments' location. A black Chevrolet Tahoe was observed bearing Arizona License plate [REDACTED] in the carport of the said business location as well as a white Lincoln Navigator bearing Arizona Freedom License plate [REDACTED] in the driveway. The Lincoln Navigator had a "For Sale by Owner 623-455-1137" sign posted on the rear window, as well. These vehicles are registered to Courtney Jermaine Hamilton 6841 W. Catalina Dr., Phoenix, AZ 85033.
23. That according to an Arizona Department of Economic Security wage inquiry Courtney Jermaine Hamilton does not report any current earned wages for the past 3 years.

Based on the above, your affiant has probable cause to believe that:

Said business records and documents are currently located at Paradigm Unlimited Enterprises, LLC, located at 4307 N. 21st Dr. Ste #3, in the City of Phoenix, County of Maricopa, and State of Arizona, more particularly described as follows:

- A small residential apartment/condominium located on the eastside of North 21st Drive, in which the main entrance faces in a western direction; number 3 appears to the north of the front door of the main entrance. This apartment/condominium is located on the second floor of a two story complex.

And in Tesla Media Developments, LLC, located at 6841 W. Catalina Dr., in the City of Phoenix, County of Maricopa, and State of Arizona, more particularly described as follows:

- A brown, one story residence located on the south side of W. Catalina Dr., in which the main entrance faces in a northerly direction; the residential number 6841 appear affixed to the top of the carport to the west of the main entrance.

And in two vehicles described as follows:

1. A 2001 black in color Chevrolet Tahoe, bearing Arizona license plate [REDACTED] VIN: 1GNEK1316 [REDACTED] registered to Courtney Jermaine Hamilton 6841 W. Catalina Dr. Phoenix, AZ 85033.
2. A 2000 white in color Lincoln Navigator, bearing Arizona Freedom license plate [REDACTED] VIN: 5LMFU28A2Y [REDACTED] registered to Courtney Jermaine Hamilton 6841 W. Catalina Dr. Phoenix, AZ 85033.

And, they possess or conceal certain property or things, which consists of any item or constitutes any evidence which tends to show that the above-described public offenses have been committed or tends to show that a particular person has committed said offenses.

The said property or things are described as follows:

1. Offering documents, scripts, or any other information provided to consumers pertaining to any of the above named individuals or entities, to include sales contracts, promissory notes, short term notes, loan agreements, joint venture agreements, limited partnerships, sales proposals, and stock certificates.
2. Leads lists, call logs, or any documents identifying consumers, the amount they submitted, and/or what they purchased/sold any of the above named entities and sales instruments.
3. Any and all correspondence between Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton, and consumers or prospective consumers in any of the above named entities and sales instruments.
4. Cash, cashier's checks, checks, money orders, and any evidence of transactions.
5. Bank records, including cancelled checks, receipts of deposit or withdrawal, and bank statements in the name of or under the signatory power of Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton.
6. All accounting records and books of original entry, including cash receipts journals, cash disbursements journals, general journals, general ledgers, subsidiary ledgers, trial balances, accounts payable journals, accounts receivable journals, and expense records pertaining to Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC,

John Evans and/or Courtney Jermaine Hamilton.

7. All financial statements, projections, forecasts, and budgets with accompanying footnotes, explanations, assumptions, justifications, recommendations, comments, and auditor's opinions pertaining to Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton.
8. Brochures, prospectuses, advertising materials, program descriptions, or other information provided to current or prospective consumers for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton.
9. Federal and State tax records, including income tax returns, for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, John Evans and employees of the aforementioned entities.
10. All documents pertaining to any of the above named entities and/or sales instruments, including letters, memos, notes, proposals, agreements, projections, estimates, and contracts.
11. Videotapes, audio tapes, and/or any other form of sound or video reproduction, except radios and televisions, which relate to any of the above named entities, consumers, potential consumers, lenders, guarantors, and joint venture partners.
12. Employee records or documents pertaining to independent contractors working for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton.
13. Telephone bills, call logs, business cards, credit card bills or receipts, message books, rolodexes, handwritten notes, and appointment books for Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans and/or Courtney Jermaine Hamilton.
14. Any other documents tending to show a relationship between Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, John Evans, Courtney Jermaine Hamilton, and buyer/consumers, potential buyer/consumers, lenders, guarantors, any financial institutions, and joint venture partners.
15. Electronic data processing and storage devices, computer and computer systems, including central processing units, internal and peripheral storage devices, such as fixed disks, external hard disks, floppy disk drives and diskettes, tape drives and tapes, optical storage devices or other memory storage devices; peripheral input/output devices, such as keyboards, printers, video display monitors, optical readers, and related communications devices, such as modems, facsimile machines, telephone equipment with built-in memory devices, and answering machines, together with system documentation, operating logs.

and documentation, software and instruction manuals. All of the above records, whether stored on paper, on magnetic media, such as tape, cassette, disk, diskette, or on memory storage devices, such as optical disks; programmable instruments, such as telephones, electronic address books, calculators, or any other storage media, together with indicia of use, ownership, possession or control of such records.

THE CURRENT INVESTIGATION

On November 5, 2013, the Arizona Attorney General's Consumer Protection and Advocacy (AGO CPA) Section referred to the AGO Special Investigations Section (AGO SIS) a request for criminal investigation regarding suspect Courtney Jermaine Hamilton and his entities, Paradigm Unlimited Enterprises, LLC and Tesla Media Development, LLC, for operating as **Illegal Enterprises** and engaging in a fraudulent "Advance Fee Scheme" operating under the guise of a "Recovery Service" located in Maricopa County.

At least one alleged employee identified as John Evans, as well as other possible unknown employees of Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, used the aforementioned entities to contact individuals throughout the United States and Canada, who have been previously victimized by what appear to be prior telemarketing scams. When victims are contacted, the **Illegal Enterprises** offer their assistance to help recover victim monies for a small "legal fee" ranging from approximately \$100-\$800; i.e., advance fee scheme where victims pay money upfront in order to receive something of greater value in return.

Monies are then typically transferred via wire and/or direct deposited into a JP Morgan Chase Bank account. Complaints filed with our office generally state that they are unable to contact the business as soon as they complete the payment, in addition to not receiving any recovery funds. Based on the complaints received, the alleged acts are ongoing and continuous with an unknown total dollar loss.

In addition, our office was also provided with various "prospectuses" sent to consumers, which refers to the **Illegal Enterprises** as Tesla Media Developments, LLC and/or Paradigm Unlimited Enterprises, LLC. The prospectuses are utilized by telephonic sellers to entice individuals, in part, as follows:

First, a material misrepresentation is made by the telephonic seller, identified as John Evans, as to where, or, what entity he is calling from, and, in at least two reported instances, the caller states they are Arizona State Registered Vendors contracted by the Arizona Attorney General's Office.

In one instance, John Evans claimed to be a "legal aid" who is employed by the Arizona Attorney General's Office. John Evans further represented that the Arizona Attorney General's Office hired Tesla Media Developments' to contact consumers because of their (the **Illegal Enterprises**) experience in search engine optimization; however, according to the Arizona Attorney General's Office Human Resources Information System (HRIS), John Evans is not a current employee of the Arizona Attorney General's Office.

Furthermore, per Arizona Attorney General's Office Senior Procurement Specialist, Cindy Palmer, Courtney Jerome Hamilton, Tesla Media Developments, LLC, nor Paradigm Unlimited Enterprises, LLC, are registered as state approved vendors through the Arizona Department of Administration State Procurement Office (ADOA-SPO). Similarly, they are not listed on the state procurement system ProcureAZ.gov, the state accounting system Arizona Financial Information System (AFIS), nor has the Arizona Attorney General's Office ever entered into a contract with Courtney Jerome Hamilton, Tesla Media Developments, LLC, and/or Paradigm Unlimited Enterprises, LLC.

Second, the telephone seller explains the reason for making contact; below is an example as stated on Tesla Media Developments' "Federal Seizure and Allocation Prospectus":

Proposal: During an investigation of home business activity it has been found that your account has achieved negative results during the course of an internet business you operated within the Arizona's Attorney Generals jurisdiction- i.e., Ace Marketing has not been able to generate some degree of commission over the course of your advertising period. Through funds seized as a result of federal action you are eligible for a refund of your initial advertising cost of \$4,000.00 not including the initial cost of website development for a total of \$4,000.00. These funds will be released to you upon receipt of \$259.47 payment for legal fees assessed to show business failure as a result of the improper implementation of your advertising program by your affiliate company" [sic].

It is important to also note that the metadata contained within the aforementioned "Federal Seizure and Allocation Prospectus" sent by John Evans, was generated using Microsoft Office Word, and further indicates that the origin of the documents was last save by "cj hamilton" on November 9, 2015 at 12:0 hours.

An example as stated on Tesla Media Developments' "Advertising/Domain Sales and Acquisition Prospectus" is as follows:

Proposal: During our yearly audit we have found that your account has achieved negative results during the previous year. Affiliate masters has not been able to generate some degree of commission over the course of your advertising period. Through funds seized as a result of federal action you are eligible for a refund of your initial coast vacations cost of \$1,150.00. These funds will be released to you upon receipt of \$200.00 payment for legal fees assessed to show business failure of the improper implanation of your advertising program by your affiliate company" [sic].

Third, when the consumer shows interest, the telephonic seller directs the consumer to wire funding for "legal fees," following the below instructions:

- Wire monies via MoneyGram at WalMart then call John Evans with the Reference Number associated with the transfer.

- Wire monies directly to a JP Morgan Chase account ending in #5166 or to a Bank of America account ending in #6236.

Fourth, the consumer is told that their refunded monies will be wired into their personal bank accounts upon receipt of their fee within approximately 7-10 days.

Once the consumer's monies are received by the Illegal Enterprises, they do not receive a refund of monies as promised; they are unable to make contact with the Illegal Enterprises, or, they receive excuses as to the delay of funding to their personal account.

Fifth, prospectuses are generally sent to consumers as an attachment via email. Prospectuses for the two entities are similar in content and list the following contact information for the Illegal Enterprises:

Tesla Media Developments, LLC

- Chief Financial Officer, Jim Garfield and/or Griffin Wayland Jamar
- Senior Web Analyst, John Evans
- Business Location: 4307 N. 21st Dr. Suite #3, Phoenix, AZ 85015
- Phone Numbers: (623) 849-8660 and/or (623) 455-1137
- Business Hours: Monday thru Friday 0900-1700 hours
- Email: TeslaMedia@yahoo.com
- Website: teslamdllc.com

Paradigm Unlimited Enterprises, LLC

- Chief Financial Officer, Jim Garfield
- Senior Web Analyst, John Evans
- Business Location: 4307 N. 21st Dr. Suite #3, Phoenix, AZ 85015
- Phone Numbers: (623) 849-8660 and/or (623) 455-1137
- Business Hours: Monday thru Friday 0900-1700 hours
- Email: Pue.Paradigm@yahoo.com
- Website: <http://Puellc.com>

CONCLUSION

Based on complaints forwarded to the Arizona Attorney General's Office, and the Better Business Bureau, as well as interviews conducted with victims and consumers, there is probable cause to believe that Courtney Jemaine Hamilton and his entities, Tesla Media Developments, LLC, and Paradigm Unlimited Enterprises, LLC, are operating as Illegal Enterprises and are actively contacting consumers and making material misrepresentations to consumers in an attempt to defraud them of their monies. The Illegal Enterprises appear to be engaging in an "Advance Fee Scheme," where consumers are duped into providing monies upfront ("Advance

"Fee"), in order to receive something of greater value in return, when in actuality, consumers receive nothing in return.

Lastly, based upon surveillance conducted on Tuesday, November 17, 2015, the said business locations 4307 N. 21st Dr., Ste. #3 and 6841 W. Catalina Dr., in Phoenix, AZ, are residences, are nondescript, and do not have any company logos or other identifiable storefront identifiers to indicate any affiliation between the Illegal Enterprises and the Arizona Attorney General's Office.

AFFIANT STATEMENT OF FACT RELATED TO DIGITAL EVIDENCE

This affiant has consulted with law enforcement professionals who have obtained hundreds of hours of electronic forensic training as well as hundreds of hours of electronic evidence collection, preservation, examination and reporting. After conferring with these electronic forensic experts, this affiant is aware that there are accepted best practices for the collection, preservation, examination and reporting of electronic evidence. Electronic evidence sources are derived from two general categories: (1) volatile data and (2) persistent data. In both cases, accepted best practices differ depending upon the source of the data and the condition of the media.

VOLATILE DATA

Volatile data is information stored in computer memory such as Random Access Memory (RAM) or dynamic cache locations. Because volatile data is lost when the computer system is powered off, this kind of evidence must be seized while a computer system is powered on. Volatile data may contain evidence relevant to the investigation, often including but not limited to, hardware identification, user account information, network connections and traffic, and running applications and processes, all of which information can assist an investigator in determining if a suspect had access to a given device or its data at a given time. Furthermore, volatile data may contain user accounts and passwords to remote encrypted volumes or "cloud" storage media being sought pursuant to this affidavit.

PERSISTANT DATA

Persistent data is data that resides on long term storage media and is generally available even after a computer system or mobile device has been powered off. Examples of sources of persistent data include, but are not limited to, internal hard drives, external hard drives, USB flash drives, cellular mobile devices (such as phones), wireless access point (Wi-Fi) capable mobile devices (such as tablets), digital camera/camcorder memory and removable media cards, magnetic tape cartridges, optical disks (such as CD, DVD, and Blu-ray), legacy floppy drives, and embedded systems (such as personal multimedia players, DVR systems, navigation systems, and video game consoles). It is consistent with recognized best practices to seize the entire system console associated with the storage media device in the event that the native system or console is required to view the storage media or its forensic copy according to rules for best

evidence. Furthermore, persistent data found locally on seized devices may provide additional evidence of electronic evidence stored on remote "cloud" storage media being sought pursuant to this affidavit.

OPERATING SYSTEMS AND FILE SYSTEMS

These persistent storage media devices store data in various ways depending upon the installed or embedded operating system(s) and the file system(s) associated therewith. Electronic evidence can and does take the form of various file formats depending upon the software application used to create the file(s) and the kind of system on which it is stored. For example, an item of evidence containing text or graphics related to the investigation could be saved in any number of file formats compatible with various software applications which create and/or display text or graphics. Likewise, a multimedia file may be stored in a variety of formats. Any of these formats can be contained and/or compressed into any number of compound archive files. Additionally, these files can be obfuscated or deleted from the file system while leaving the raw data or remnants of the raw data elsewhere on the storage media device. Therefore, it is consistent with best practices to seize the operating system along with any and all peripheral hardware and software applications that may be required to access the electronic evidence stored on such media devices in various formats.

MOBILE DEVICES

This affiant understands the term "mobile device" to mean any electronic device which is readily portable and intended to be used for media recording, playback, and/or transmission of electronic communications via cellular or wireless networks (such as Wi-Fi, Bluetooth, or comparable technologies). Mobile devices (examples include, but are not limited to, phones, tablets, e-readers, cameras, and multimedia players) may store electronic communications including, but not limited to, text messages (SMS-Short Message Service and MMS-Multimedia Message Service), picture messages, video messages, chat messages, social media accounts, and general user-created media files in the form of persistent data described above. In addition to storing electronic evidence locally, mobile devices store electronic evidence on remote "cloud" storage media via electronic transmission of data through wireless networks. These remote "cloud" storage media locations are accessed by user created accounts accessible through the mobile device and/or other linked devices.

REMOTE "CLOUD" STORAGE

This affiant understands that many personal devices (desktop computers, laptop computers, mobile devices) provide access to user accounts in which the stored data does not reside on the local device, but rather at remote location(s) housed by commercial service providers or hosts. Inasmuch as evidence of such remote "cloud" storage exists locally on seized devices, a complete investigation requires access to electronic evidence stored on remote "cloud" storage locations. Such data constitutes "electronic communication" as governed by the Electronic Communications Privacy Act (18 U.S.C. 2510(12)). Disclosure of electronic communication is in turn governed by the Stored Communications Act (18 U.S.C. 2703) by the following

subsections: (a) disclosure of information stored less than 180 days in a remote computing service requires a warrant by a court of competent jurisdiction; (b) disclosure of all other electronic communications (more than 180 days) requires at a minimum a grand jury subpoena (or warrant); and (c) disclosure of subscriber information including name, address, telephone connection records, length and types of services utilized, mobile device numbers and/or assigned network addresses (IP-Internet Protocol addresses) and means of payment requires a court order (or warrant or grand jury subpoena) by a court of competent jurisdiction.

ENTERPRISE SYSTEMS

This affiant understands that in some enterprise environments it is impractical to shut down live network systems for the purpose of evidence acquisition without causing substantial financial loss to the enterprise organization. In such cases, the least invasive acquisition methods in accordance with best practices may be utilized to acquire digital forensic copies of that data for evidentiary purposes (i.e. without shutting down the enterprise network or system). Where practicable, the original storage media or hard drives may be copied (cloned). These cloned drives may be exchanged with the original storage media or hard drives so that the original storage media or hard drives may be seized for evidentiary purposes. Thus, the enterprise computer system may continue to function with the cloned drives in lieu of the original drives. Once the original storage media devices are seized, forensic copies will be made of those media devices in accordance with best practices for examination purposes.

ORIGINAL EVIDENCE AND BEST EVIDENCE

Rule 1002 of the Arizona Rules of Evidence states that original evidence is required for verification purposes. Rule 1003 of Arizona Rules of Evidence states that the duplicates of original evidence are admissible where authenticity of the original and duplicate are not in question. Currently accepted best practices state that electronic evidence is acquired using known and accepted forensic utilities to create a digital copy of the target media. Where applicable, the digital copy will be verified using a mathematical algorithm that provides a unique identifier of the digital forensic copy. This unique identifier is typically known as a "hash value" which can be compared to the "hash value" of the original evidence.

COLLECTION AND ANALYSIS

This affiant has reason to believe that the suspect used desktop computers, laptop computers, server-based storage, and mobile device systems as instruments of the crime and/or as a repository of evidence of the crime being investigated. Wherefore, this affiant seeks to collect the aforementioned volatile data and the persistent data associated with those electronic data storage systems. Upon seizure of electronic data storage systems relevant to this investigation, including the aforementioned volatile and persistent data, your affiant will submit a request to trained forensic examiner(s) for forensic review and analysis of seized data at a later date. Forensic review and analysis will be conducted on digital copies of the original evidence in order to preserve the original evidence in its most pristine state available. Additional forensic copies

can be produced upon request for discovery or at the discretion of the court.

GLOSSARY OF TERMS

Cache:	Specified locations on storage media where data is stored so that future requests for that data can be accessed more quickly than if the application had to go to the original source of the data.
Chat/IM:	Instant messenger services include text, video or picture based streams between two or more people in the same chat or instant message service. These chat communications are sometimes logged by the user and/or the service provider.
Clone Drive:	A bit-for-bit copy of a hard drive may be copied to another hard drive of the same or greater data capacity. Exchanging original evidence with a clone drive allows the target system to remain in operation.
Cloud Storage:	Electronic data stored on remote storage media, usually accessible through commercially available internet service providers (ISP); data may be broken up into multiple segments and stored on multiple servers in separate geographical locations. Reference to "the cloud" is likely due to this seemingly incorporeal nature of electronic data.
Hash Value:	Also known as a "hash sum" or a "hash code," this unique alpha-numeric identifier for a given set of data can be generated by running that data set through a complex mathematical algorithm. Due to the complexity of the algorithm, the hash value for a given data set cannot be replicated by a different data set. This is true no matter how slight the difference of the two data sets. These unique identifiers are used forensically to compare the data set of original evidence to the data set of a digital copy of the original evidence in order to verify the authenticity of the copy to the original.
IP Address:	(Internet Protocol Address) is a unique numerical identifier assigned to any computer device or peripheral that is attached to a computer network that uses that protocol. Data is routed from one device to another over a network and identifies intended recipients by the assigned IP address of that device. Many network systems log IP addresses of devices that communicate on that network, thereby identifying potential senders and receivers of a given transmission.
ISP:	Internet Service Providers (ISP) are commercial telecommunication companies, commercial data storage providers (examples include, but are not limited to, Carbonite, Dropbox, Google Drive, iCloud, OneDrive, SkyDrive, and Evernote), and storage-capable social media sites (examples include, but are not limited to, Facebook.com, YouTube.com, Foursquare.com, Twitter.com, Gmail, Hotmail, Yahoo!, Google+, Bebo.com, deviantART.com, Instagram.com, LinkedIn.com, Pinterest.com, 4chan.com, TinyChat.com, and Tumblr.com). There is some

cross-over among the various services listed above.

MMS: (Multimedia Message Service) messages are usually sent from phone to phone (or another mobile device), consisting of messages longer than 160 characters or messages containing pictures, video or other attached media.

RAM: (Random Access Memory) consists of computer memory chips with high speed access to computer processors for background operations including operating system functions and other software applications. RAM chips do not have a file system structure, allowing data to be written quickly to temporarily reserved locations while an application is running and then over-written by new applications when the data is no longer required. Because data stored in RAM is usually released or lost when the computer system is powered off, RAM data is referred to "volatile" data.

SMS: (Short Message Service) messages are text-based messages, usually sent from phone to phone (or another mobile device) and can typically send up to 160 characters without pictures or video.

Wi-Fi: A mode of accessing a device, a private network, or the internet from a remote machine such as a desktop computer, laptop, phone, or tablet that has a wireless connection via a set of broadband wireless networking standards.

Based on your affiant's training, expertise and experience in Major Fraud investigations, and upon the facts cited above in this affidavit, Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jerome Hamilton and others as yet unknown have committed and are committing the crimes previously cited on Page 1 of this affidavit, and that evidence of these crimes can be found in the above-described premises, curtilage, and of the above described vehicles for the herein above described property or things, and if you find the same or any part thereof, to retain such in your custody, or in the custody of the agency which you represent, as provided by A.R.S. §13-3920.

Therefore, your affiant prays and requests that a search warrant be issued for the purpose of securing, maintaining, and preserving this evidence which may otherwise be lost or destroyed, said evidence to be retained in the custody of your affiant or in the custody of the agency which affiant represents, and disposed of according to law, pursuant to A.R.S. 13-3920.

(S)

Subscribed and sworn to this 20th day of Nov 2015.

Judge of the Superior Court of Maricopa County
Honorable Virginia Richter

Arizona Superior Court
Supplemental Affidavit for Search Warrant
County of Maricopa, State of Arizona

SW No. 205 010791

YOUR AFFIANT, MADISON MACDONALD, A PEACE OFFICER IN THE STATE OF ARIZONA BEING DULY SWEORN, UPON OATH, DEPOSES AND SAYS:

This supplemental search warrant affidavit is being submitted in conjunction with the original search warrant affidavit relating to Courtney Jermaine Hamilton, Tesla Media Developments, LLC, and Paradigm Unlimited Enterprises, LLC.

That on October 5, 2015, a victim identified as [REDACTED] filed a complaint with the Arizona Attorney General's Office Consumer Protection and Advocacy Section stating that she was contacted by John Evans of Tesla Media Developments, LLC, 4307 N. 21st Dr. Ste #3, Phoenix, AZ 85015. Mr. Evans explained to [REDACTED] that she was eligible to recover funds from a previous telemarketing venture identified as Ace Marketing. Mr. Evans further explained that as a result of federal action taken against Ace Marketing, [REDACTED] was eligible for a refund; however, [REDACTED] would be required to pay a \$125.00 "fee" via wire transfer.

Upon receiving instruction from Mr. Evans, [REDACTED] deposited \$125.00 into a JP Morgan Chase account ending in 5166, which has been documented by way of deposit receipts previously provided to our office. Mr. Evans further explained to [REDACTED] that it would take approximately 7-10 days to receive the recovery funds into her personal account.

Since depositing her monies into Tesla Media Developments' account, [REDACTED] has not received any monies as promised nor has she received a return of her \$125 "fee." Additionally, [REDACTED] has not been able to reach John Evans or any employee of Tesla Media Developments, LLC, after several failed attempts via telephone.

Based on your affiant's training, expertise and experience regarding Major Fraud investigations, and based upon the facts cited above in this affidavit, Tesla Media Developments, LLC, Paradigm Unlimited Enterprises, LLC, Courtney Jermaine Hamilton, and others as yet unknown have committed and are committing the crimes previously cited on Page 1 of this affidavit, and that evidence of these crimes can be found in the above described premises, curtilage, and of the above described vehicles for the herein above described property or things, and if you find the same or any part thereof, to retain such in your custody, or in the custody of the agency which you represent, as provided by A.R.S. §13-3920.

Therefore, your affiant prays and requests that a search warrant be issued for the purpose of securing, maintaining, and preserving this evidence which may otherwise be lost or destroyed,

said evidence to be retained in the custody of your affiant or in the custody of the agency which
affiant represents, and disposed of according to law, pursuant to A.R.S. 13-3920.

(S.)

Subscribed and sworn to this 20th day of November, 2015.

Judge S. P. Richter
Judge of the Superior Court of Maricopa County

Honorable Virginia Richter