POINTS AND AUTHORITIES

The District Attorney of Alameda County Presents a Weekly Video Survey of Criminal Law Approved for Credit Toward California Criminal Law Specialization: #172-- The Alameda County District Attorney's Office is a State Bar of California Approved MCLE Provider.

Week Of	Topic	Guests	30 min
Oct. 19, 2020	Social Media Evidence, Part II	DDA Mark Jackson	General

This week's P&A is Part II of a two-part series on the Use of Social Media Evidence in Court.

Part I covered the following topics:

- **An Explanation of Social Media Evidence**
- **The Sources of Social Media Evidence**
- **The Requirements for Obtaining Social Media Evidence**

This Week's P&A, Part II, will discuss how to get Social Media Evidence Admitted in Court.

Suggestions for future shows, ideas on how to improve P&A, and other comments or criticisms should be directed to Mary Pat Dooley at (510) 272-6249, marypat.dooley@acgov.org. Technical questions should be addressed to Gilbert Leung at (510) 272-6327. Participatory students: MCLE Evaluation sheets are available on location and certificates of attendance are constructively maintained in your possession in the Ala. Co. Dist.Atty computer banks. If you wished to be added to or removed from the P&A mailing list, contact Mishel Jackson; mishel.jackson@acgov.org

Introduction of Social Media Evidence In Court

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Mr. Jackson has served as a deputy district attorney in Alameda County for nearly twenty-six years prosecuting complex white-collar, computer and intellectual property theft crimes. His extensive trial expertise includes serving as first-chair in many jury trials including numerous high-profile murder cases. Mr. Jackson served as chairman of the State Bar Criminal Law Section Executive Committee (2013-2014).

Mr. Jackson served as a Special Assistant United States Attorney in the Northern District of California for six years and authored various writings. He is a nationally recognized speaker on digital evidence, identity theft and high-technology crimes.

Mr. Jackson graduated from the University of California, Hastings College of the Law in 1994 and San Francisco State University in 1991.

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DISCLAIMER

Points of view or opinions expressed during this presentation are those of the speaker and do not represent the official position of the Alameda County District Attorney's Office.

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Agenda

1. What is Social Media?
2. Examples of SME being used in court.
3. Where and how to obtain Social Media Evidence?
4. How to admit Social Media Evidence in Court?

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1. What is Social Media Evidence?

Virtual Treasure Troves of Evidence!

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CA Labor Code §980(a)

Defines Social Media (Employer Restrictions)

(a) As used in this chapter, *"social media" means an electronic service or account, or electronic content*, including, but not limited to, videos, still photographs, blogs, video blogs, podcasts, instant and text messages, email, online services or accounts, or Internet Web site profiles or locations.

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Mark's Social Media Definition

Electronic communications online with a group of people through various types of apps & platforms!

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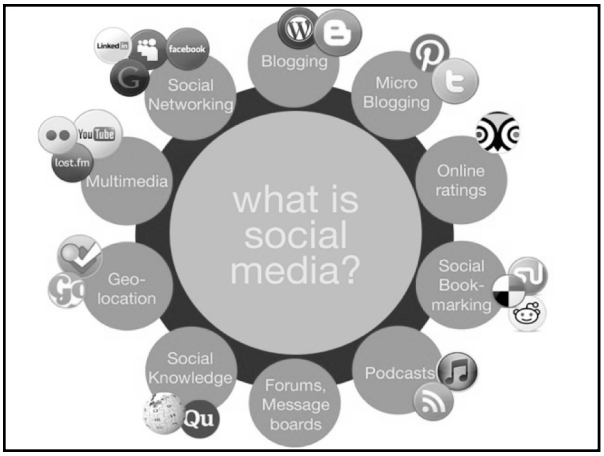

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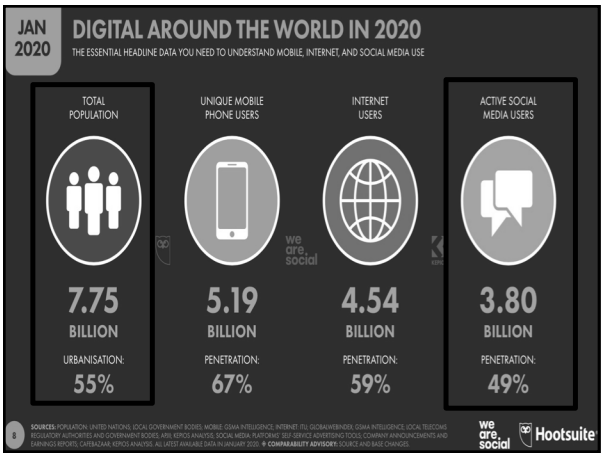

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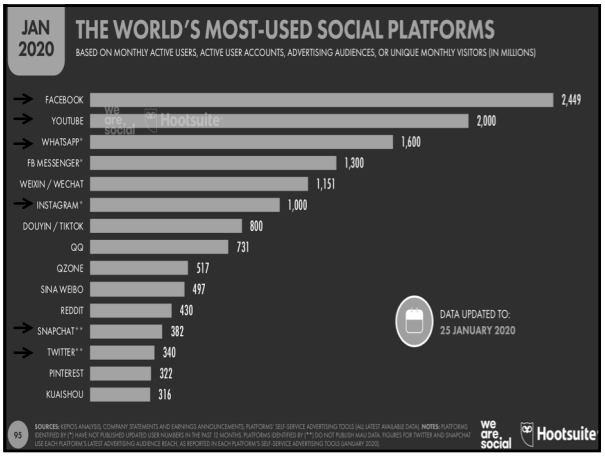

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2. Examples of cases using Social Media Evidence

Virtual Treasure Troves of Evidence!

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Social Evidence Examples

- Direct evidence of a crime or cause of action:
  - Video of D shooting V!
  - Confession – video of D bragging about the crime!
  - Photo showing D at the crime scene.
  - Facebook gang photos!
- Circumstantial evidence of a crime.
- Motive:
  - IMs proving a dispute between V & D prior to shooting.
- Credibility of witnesses:
  - Instagram photos of W w/ D establishing bias.
  - Prior consistent or inconsistent statements on SM by W.
  - Video of W in a crime.

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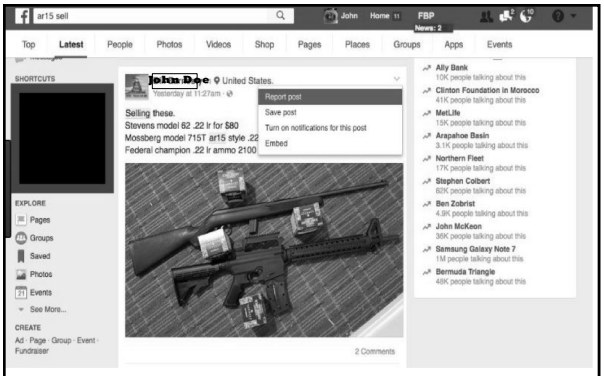

Hypothetical: John Doe lives in Fremont, CA and is a convicted felon. D is charged w/ possessing guns and selling them on the internet. DA seeks to admit FB post into evidence.

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People v. Cruz (2020) 46 Cal.App.5th 715

- D was convicted of several crimes against his ex-girlfriend including stalking and criminal threats. Numerous threats sent to V by Facebook Messenger from various fake accounts was admitted into evidence.
- Held: Prosecution established a sufficient prima facie showing that Facebook messages sent to V were actually from the defendant.
- Authenticated with a combination of Content and Witnesses:
  - V provided detailed evidence of D's stalking, vandalism, direct threats and repeated attempts to contact her.
  - FB texts included content that D had previously communicated to V.
    - D thought V was involved with Luis. Text referenced Luis.
    - Text sent a screenshot of V & Luis texts. V & D had a joint account.
    - Text mentioned V's car window being broken out. True.
    - Text references having sex with V at D's uncle's apartment. True.
    - Text w/ a photo of V's car outside her job at Home Depot prior to damage.
  - FB texts included content that D had directly communicated to V.

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Relevant California Cases

- Red Light Camera Case (Digital Evidence):
  - *People v. Goldsmith*, (2014) 59 Cal.4th 258, 259 [172 Cal.Rptr.3d 637, 326 P.3d 239] (holding that in the absence of contrary evidence, automatically generated red light camera images are presumed to be authentic).
- Social Media Cases:
  - *People* v. *Beckley*, (2010) 185 Cal.App.4th 509, 510 [110 Cal.Rptr.3d 362] (held a Myspace image should have been barred for lack of authenticating evidence).
  - *People* v. *Valdez*, (2011) 201 Cal.App.4th 1429, 1438 [135 Cal.Rptr.3d 628] (held a Myspace picture was sufficiently authenticated given messages addressed to the defendant on the page and the page being password protected).
  - *Juror Number One v. Superior Court*, (2012) 206 Cal.App.4th 854, 855 [142 Cal.Rptr.3d 151] (held the court can compel a juror to disclose Facebook posts made during jury service).

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U.S. v. Recio (4th Cir. 2018) 884 F.3d 230

- Ex-felon in possession of a gun. Facebook post quoting rap lyrics purported to be from D's account admitted.
  - FB: It's Always Tucked, Kuz I'll B Damn If My Life Get Took!
- Holding: FB post was properly authenticated. (FRE 901(B)(4))
  - Facebook account/post linked to Def by showing that:
    - (1) the user name associated with the account was Larry Recio (Def);
    - (2) An email addresses associated with the account was larryrecio20@yahoo.com;
    - (3) Over 100 photos of Recio were posted to the account, and
    - (4) One of the photos posted to D's timeline was accompanied by the text Happy Birthday Larry Recio.
  - Facebook records custodian established Business Records Foundation.
  - There was no evidence that another person accessed the Facebook account.

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U.S. v Lewisbey (7th Cir. 2016) 843 F.3d 653

- Illegal guns smuggling and sales. Texts messages from D's seized phones and Facebook posts admitted during the trial.
- Key Holding: FB posts were properly authenticated.
  - D admitted the Facebook posts were his (this alone was sufficient for authentication)
  - FB page listed D's nickname, date of birth and his place of residence (Houston) where he lived prior to Illinois.
  - The email addresses associated with the FB account corresponded to both the email linked with D's iPhone and D's former email address at the University of Kansas.
  - FB page contained more than 100 photos of D including a profile picture
  - Many of the FB photos matched photos also found on D's iPhone.
  - FB application on D's iPhone was linked to the Facebook account.
  - Messages on the FB account discussed D's trips to gun shows in Fort Wayne and Indianapolis on dates when gun shows actually occurred at these locations.

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3. Where and how do you obtain Social Media Evidence?

Virtual Treasure Troves of Evidence!

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Potential Sources of Social Media Evidence

1. Social Media Sender/Recipient's Digital Device:
- **-Desktop and laptop computers**
- **-Cellular phones (iPhone, Android, etc.)**
- **-Tablets, iPads and similar devices**
- **-Legal process required (S/W – Cal ECPA)**

2. Social Media Services Provider Network:
- **-Basic Subscriber, Transactional & Content Data**
- **-Legal process required (ECPA)**

3. Internet-based Publicly Available Information:
- **-Unlocked user accounts, internet search engines, etc.**

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Electronic Communications Privacy Act of 1986

- Title I protects wire, oral and electronic communications while in transit.
- Title II protects stored electronic communications. (Stored Communications Act, 18 U.S.C 2701)
- Both Title I & II commonly referred to as ECPA!
- Title III protects real-time communications aka wiretaps.

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- ECPA governs wire, oral and electronic communications transmitted over a network "while in transit" or "while stored after being received."
- 3 Basics Types of Data Covered:
  - Basic Subscriber Information:
    - Name, address, email, IP Address, length of service, credit card information, email address, recent login/logout IP address(es), etc.
  - Transactional Information (Non-Content):
    - Email headers, communication IP addresses, etc.
  - Content Information (The Good Stuff):
    - Text messages, videos, photos, emails, instant messages, audio recordings, etc.

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1. All subscriber information including but not limited to:
   a. Name
   b. Address
   c. Date of birth
   d. Gender
2. User Neoselect (Basic Subscriber Information) including:
   a. User Identification Number
   b. E-mail address
   c. Date and Time Stamp of account creation date
   d. Most Recent Logins
   e. Registered Mobile Number
3. User Neoprint (Expanded Subscriber Content) including:
   a. Profile Contact Information
   b. Mini-Feed
   c. Status Update History
   d. Shares
   e. Notes
   f. Wall Postings
   g. Friend Listing, with Friend's Facebook ID's
   h. Group Listing, with Facebook Group ID's
   i. Future and Past Events
   j. Video Listing, with Filename
4. User Photoprint (User Photos) including:
   a. Uploaded photographs
   b. Photographs that have the requested user tagged in them
5. Any group information
6. Any private messages, including those:
   a. Sent From user

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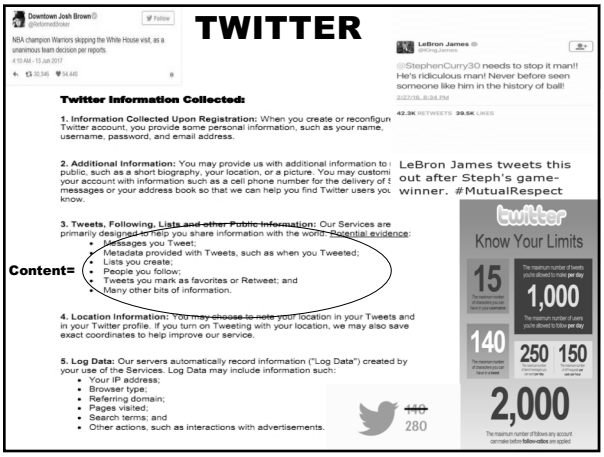

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LINKEDIN

LinkedIn Information Collected

- ***Registration information:*** name, email address, country, and password.
- ***Profile Information:*** information describing your skills, professional experiences, educational background, group memberships, etc.
- ***Contacts Information:*** your links/connections to other people.
- ***Log files, IP Addresses and information about your computer and mobile device:***
  - -Captures the URL of the site from which you came and the site to which you are going when you leave LinkedIn.
  - -Internet protocol ("IP") address of your computer (or the proxy server you use to access the World Wide Web).
  - -Your computer operating system and type of web browser you are using.
  - -Email patterns, your mobile device (including your UDID).
  - -Name of your ISP or your mobile carrier.

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ECPA – Required Legal Process

- ❖ Subpoena:
  -Basic Subscriber Information
  -Publicly Available Information (Implied Consent)
- ❖ Subpoena w/ Notice:
  Opened Email
- ❖ 2703(d) Court Order (Fed. Ct. primarily):
  Transactional Records (Non-Content)
- ❖ 2703(d) Court Order w/ Notice:
  Everything other than Unopened Emails
- ❖ Search Warrant:
  All Account/Content information

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Preservation Letter Sample: 90 days backwards

Facebook, Inc.
1601 California Avenue
Palo Alto, CA 94304
County of Santa Clara
Fax: (650) 644-3229
E-mail: subpoena@fb.com

VIA FAX to Fax: (650) 644-3229

Re: 18 USC 2703(f) Preservation Request - User Name: Kristen W; Facebook User ID: XXXXXXX and User Name: Rob L. Facebook User ID: XXXXXX

Dear Madam/Sir:

I am writing to make a formal request for the preservation of records and other evidence pursuant to 18 U.S.C. § 2703(f) pending further legal process.

You are hereby requested to preserve, for a period of 90 days, the records described below currently in your possession, including records stored on backup media, in a form that includes the complete record. You also are requested not to disclose the existence of this request to the subscriber or any other person, other than as necessary to comply with this request. If compliance with this request may result in a permanent or temporary termination of service to the accounts described below, or otherwise alert the subscriber or user of these accounts as to your actions to preserve the referenced files and records, please contact me before taking such actions.

This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request.

This preservation request applies to the following records and evidence:

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ECPA & Civil Cases

- **Stored Communications Act prohibits disclosure based on subpoenas. 18 U.S.C.A. §2702(b)(3)**
  - **Note: CA Supreme Court ruling on Public communications.**
- **Informal discovery: search and obtain publicly available posts/information.**
- **Civil Discovery Process i.e. written interrogatories, production requests, depositions, etc. seeking relevant SME. Motion to compel litigant to provide the required S.M.E may be appropriate.**
  1. **Account holder provide the requested S.M. content;**
  2. **Account holder sign consent form for electronic service provider authorizing release the information;**
     - *Juror Number One v. Superior Court,* (2012) 206 Cal.App.4th 854, 855 [142 Cal.Rptr.3d 151] (held the court can compel a juror to disclose Facebook posts made during jury service).
  3. **Username & Password for the S.M. account.**

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CA Electronic Communications Privacy Act (PC 1546.1 – Super Warrants)

- Goes beyond the Federal ECPA and increases the requirements for CA law enforcement to obtain digital evidence.
  - Fed. ECPA: A warrant for "Content" from electronic service providers/ESP
  - CAL ECPA: A warrant for "All" electronic information/digital evidence
- Warrant requirement
  - Broader coverage of digital evidence:
    - ALL devices, metadata, device location tracking, emails, text messages, geolocation data, passwords, IP addresses, etc. not just ESP content.
  - Limited exceptions: Consent, from Inmate, Emergency, Lost/stolen, etc!
- Notice requirement (Law enforcement)
  - Identified targets of the warrant or emergency request
  - Ct. ordered 90 day delayed notice
- Minimization (Scope and use of the data)
  - Must be related to the case

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4. How do you admit Social Media Evidence in court?

Virtual Treasure Troves of Evidence!


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What is "Evidence?"

Evidence means testimony, writings, material objects, or other things presented to the senses that are offered to prove the existence or nonexistence of a fact.

CA E.C. §140

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Traditional, Digital & Social Media Evidence Basics

Regardless of whether the proponent is introducing traditional or digital evidence, the foundation required for admissibility is generally the same!

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Types of Digital Evidence

- Social Media Content
- Cell Phone Date
- Computer Data Files
- Deleted Files
- Data from Slack Space
- Digital Photographs and Video
- Server Log Files
- Email
- Chat/IM/IRC Logs
- Internet History
- Web Pages
- DNS registration records
- Subscriber Records
- Forensic Reports

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Motion in limine

- Better resolved by Pre-trial Motion *in Limine.*
- Authentication- is document what it purports to be.
- Preponderance of the evidence.
- Can a reasonable juror find that it is what it purports to be.
- Essentially, what is necessary is a prima facie case.

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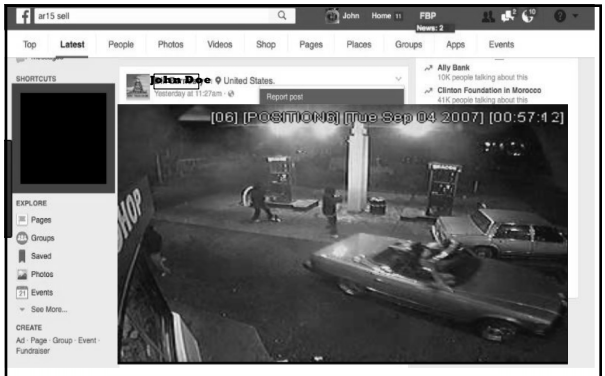

Hypothetical: John Doe shot and killed V as V was driving out off the gas station. W recorded the murder on his phone and live streamed the video to Facebook. D is charged w/ murder. DA seeks to admit FB video post!

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4 HURDLES OF ADMISSIBILITY OF EVIDENCE

1. Relevance

2. Authenticity

3. Secondary Evidence Rule

4. Hearsay

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1. Relevance

- **Relevant evidence" means evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. CA E.C. §210**
- **The court in its discretion may exclude evidence if its probative value is substantially outweighed by the prejudicial effect, undue consumption of time, confuse the issues or mislead the jury. CA E.C. §352**

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Sample Theories of Admissibility for SME

- Direct evidence of a crime or cause of action:
  - Video of D shooting V!
  - Confession – video of D bragging about the crime!
  - Photo showing D at the crime scene.
  - Facebook gang photos!
- Circumstantial evidence of a crime.
- Motive:
  - D Tweets that he took the $$$ because…..
- Credibility of witnesses:
  - Instagram photos with D
  - Prior consistent statement by W!
  - Prior inconsistent statement by W!

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2. Authentication - Proof

The proponent must produce evidence sufficient to support a finding that the item is what the proponent claims it is!

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Authentication of Writings

Be creative and think broadly!

"Nothing in this article shall be construed to limit the means by which a writing may be authenticated or proved." E.C. §1410

- **A witness to the execution of the writing (§1413)**
- **Admission of authenticity (§1414)**
- **Acted upon as authentic by party it's offered against (§1414)**
- **Handwriting (§1415-1419)**
- **Evidence of reply (§1420)**
- **Content (E.C. §1421)**

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Federal Rule of Court 901 – Authentication or Identifying Evidence

(a) In General.
To satisfy the requirement of authenticating or identifying an item of evidence, **the proponent must produce evidence sufficient to support a finding that the item is what the proponent claims it is.**

Example – (b)(4) Distinctive Characteristics and the Like. provides that circumstantial evidence, including "appearance, contents, substance, internal patters, or other distinctive characteristics of the time, taken together with all the circumstances," can help authenticate evidence.

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Social Media Evidence

A. The use of Social Media Evidence in the courtroom is a relatively new phenomenon and developing area.

B. The primary hurdle for the proponent of SME to overcome is typically Authentication.

>The SM communication came from a specific person.

C. Courts recognized the following issues:

- **Anyone can join the networking & post information.**
- **The posted information is generally not verified.**
- **Accounts & networks can be compromised/hacked.**

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Social Media Evidence

- Keys to Authentication:
  1. Establish Authorship of the SME.
     - → Proof a specific person authored the social media post.
  2. Establish the Accuracy of the SME exhibit offered in court.
     - → Proof of metadata evidence from the social media post.
- Authentication Approaches:
  - Direct Evidence
  - Circumstantial Evidence:
    - Distinctive Characteristics.
    - Non-Distinctive Characteristics.
    - A combination of any of the above approaches.

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Social Media Authentication by Direct Evidence

1. Admission by the author of the communication.
2. Testimony from a witness who observed the author make the communication.

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Authenticating the video with W!

- Showing what has been marked as P#1, do you recognize it?
- How do you recognize it?
- Did you watch it prior to court?
- What is it?
- Did you record the video?
- When?
- Where?
- Does P#1, accurately reflect what you observed at the gas station on June 1, 2020 around 10pm?

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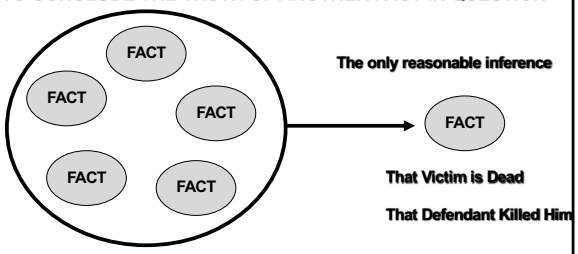
CIRCUMSTANTIAL EVIDENCE

MAY USE ONE FACT OR A GROUP OF FACTS
TO CONCLUDE THE TRUTH OF ANOTHER FACT IN QUESTION



YOU MUST ACCEPT ONLY REASONABLE CONCLUSIONS AND REJECT ANY THAT ARE UNREASONABLE

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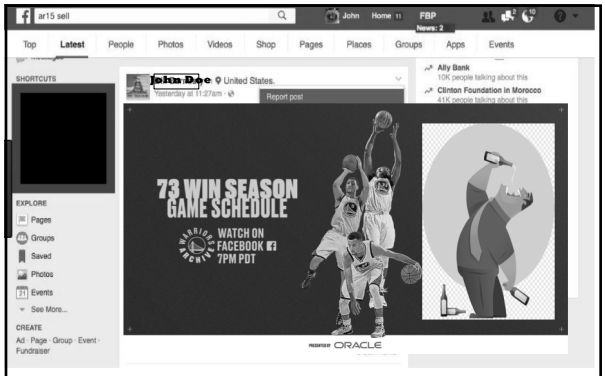

Hypothetical: John Doe celebrated his 21st birthday last night at Warriors vs Lakers game. Doe posted FB pics showing him drinking beer at the game. He was arrested for DUI while driving home. DA seeks to admit FB photos!

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Authentication by Circumstantial Evidence – Distinctive Circumstances or Characteristics

- Distinctive content (Circumstances or Characteristics) tending to identify the author of the Social Media page/post.
  - D's CDL proves his 21st birthday is today.
  - D's FB friends send Happy 21st Birthday wishes.
  - D posts having a great birthday at the Warriors game.
  - After party tonight is at the Hilton Airport.
  - Other photos on FB page of D.
- Content that is unique to alleged author, such as birthday, age, city of residency, high school attended, employer, etc.
- Alleged author's conduct after the S.M. post is consistent with the content of the prior post.
  - Leaving the Warriors game now and headed to the Hilton.
  - D is stopped driving toward the Hilton Airport.
- The content of the post contains a photo of the author.

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Authentication by Circumstantial Evidence – Distinctive Circumstances or Characteristics

- **Use of language, names, phrases, slang, emoticons ♦☻♥♣, abbreviations, punctuations, etc. unique to allege author.**
- **Evidence of security measures, such as usernames & passwords to access the S.M. website suggests control by account holder.**
- **Reply-Letter Doctrine - replies with a witness to the communication that suggests W was talking to the author.**
- **Testimony from a witness, including a police officer, with training on the social media site, who testifies about what he/she observed on the screen. In re K.B. (2015) 238 Cal.App.4th 989**
- **When an IP Address is linked to a social media post, evidence linking the author to the use of that IP Address**

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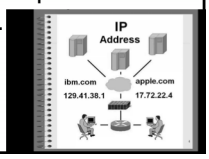
Internet Protocol Addresses

- When you make a phone call, you are calling from a phone number.
- The phone you are calling also has a phone number.
- With the Internet, every computer has a number, functionally similar to a phone number called an IP Address.
- Example = 201.34.55.109



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Social Media Authentication - Computer Expert Testimony

Computer forensic examiner testimony to establish authorship:

- **S.M.E. recovered from digital devices in possession of the alleged author tend to establish authorship.**
  - **Phone, Tablet, Computer, Etc.**
- **The S.M.E. from an IP Address linked to the alleged author through other accounts using the same IP Address like emails.**
  - **IP Address used to send FB Post: 201.34.55.109**
  - **IP Address used to access D's known email: 201.34.55.109**
- **Metadata in a photo posted on Social Media like Time & Location.**
  - **Combine w/ testimony the alleged author was at the location.**

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3. Secondary Evidence Rule – EC §1520

The content of a writing may be proved by an otherwise admissible ORIGINAL.

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EC §255 Defines Originals

Original means the writing itself or any counterpart intended to have the same effect by a person executing or issuing it. An "original" of a photograph includes the negative or any print there from.

If data is stored in a computer or similar device, any printout or other output readable by sight, shown to reflect the data accurately, is an "original."

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Digital Evidence - No Best Evidence Rule in CA

- California has rejected the best evidence rule in favor of the Secondary Evidence Rule - Evidence Code sections 1552 and 1553 *(Goldsmith)*
  - A printout of a video is presumed to be reliable unless the opponent of the evidence can show unreliability.
  - If unreliability is shown, then the burden of proof switches back to the proponent to prove reliability by a preponderance of the evidence.

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4. Hearsay Evidence

Evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter stated.

Hearsay evidence is presumed to be inadmissible. §1200 et seq.

"Statement" means (a) oral or written verbal expression or (b) nonverbal conduct of a person intended by him as a substitute for oral or written verbal expression. §225

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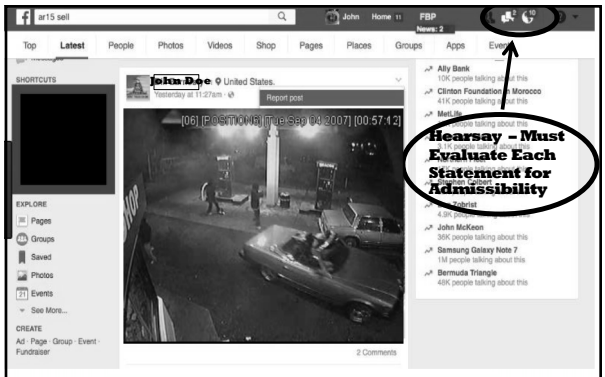

Hypothetical: John Doe shot and killed V as V was driving out off the gas station. W recorded the murder on his phone and live streamed the video to Facebook. D is charged w/ murder. DA seeks to admit FB video post!

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4. EC 1200-Hearsay Evidence

Four questions:

1. Does the evidence constitute a **statement**, as defined by EC 1200?
2. Was the statement made by an **out-of-court declarant** as defined by EC 1200?
3. Is the statement being offered to prove the **truth of its contents,** as required by EC 1200?
4. If the statement is hearsay, is it **covered by one of the exceptions** identified in EC 1220-EC 1390?

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ESP Provided Records – EC §1271 Business Records Exception

i. **Writing was made in the regular course of business**

ii. **Writing was made at or near the time of the act, condition or event**

iii. **Custodian or other qualified witness testifies to its identity and the mode of its preparation**

iv. **Sources of information and method and time of preparation were such as to indicate its trustworthiness**

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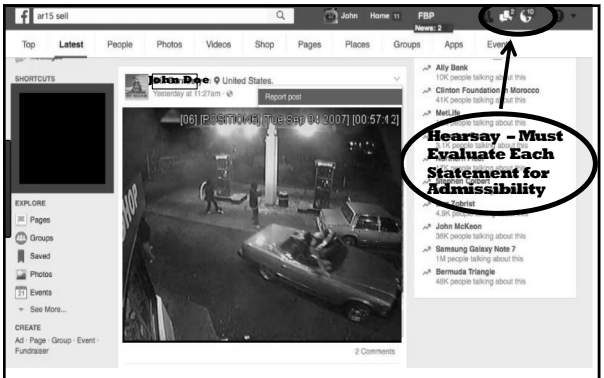

Hypothetical: John Doe shot and killed V as V was driving out off the gas station. W recorded the murder on his phone and live streamed the video to Facebook. D is charged w/ murder. DA seeks to admit FB video post!

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Common Hearsay Exceptions- Social Media Content

- Official Records
- Business Records
- Party Admission
- Adoptive Admission
- Former Testimony
- State of Mind
- Prior Consistent Statements
- Prior Inconsistent Statements
- Past Recollection Recorded
- Writing as Record of Act
- Declaration Against Interest
- Statements in Furtherance of a Conspiracy
- Published List or Directory

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SME Records obtained by Search Warrant AND Custodian of Records AFFIDAVIT

- ESP SW Custodian Authentication is now aligned w/ SDT Custodian Authentication process i.e. no live witnesses required!
- ESP & PC 1524.2(B)(4) - SW records Admitted the same as records received by Subpoena Duces Tecum
  - Amended Evidence Code sections 1561-1563.
  - No longer require live custodian W to lay foundation.
  - Now no need to re-subpoena documents received by search warrant.
  - Do not have to go to Clerk like SDT records.
- Leg. history makes clear LE does not pay for copies obtained by SW and SDT in CA.

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Metadata is NOT Hearsay b/c it is not a statement of a PERSON!

- Metadata, such as date and time, imprinted on the video is **not** hearsay.
  - Hearsay requires a statement (or conduct) of a **person**. Simply put: "The Evidence Code [§§ 175, 225] does not contemplate that a machine can make a statement." People v. *Goldsmith*
- Computer Forensic Examiners to Authenticate Evidence: Always be prepared to authenticate the metadata separate and apart from the substantive content the party is seeking to admit!

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Conclusion – Thank You!

Virtual Treasure Troves of Evidence!

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