IN THE UNITED STATES COURT OF APPEALS
FOR THE ARMED FORCES

UNITED STATES, Appellee v. Ethan R. SHIELDS Staff Sergeant (E-6) United States Marine Corps, Appellant	**REPLY BRIEF ON BEHALF OF APPELLANT** Crim. App. Dkt. No. 202100061 USCA Dkt. No. 22-0279/MC

TO THE JUDGES OF THE UNITED STATES COURT OF APPEALS FOR THE ARMED FORCES:

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Argument

A. The Government fails to account for the extremely narrow date parameter of the search authorization: December 23, 2018.

Despite that Mr. Smith's search authorization only allowed him to look for cell phone location data from one particulate date, Mr. Smith looked at the largest of 215,767 images irrespective of their date. The Government argument that Mr. Smith looked in "places that were likely to contain unparsed [meaning extracted and sorted] location data" overlooks the extremely limited scope of the search authorization.[1] Mr. Smith was only authorized to search for location data from one very specific date—not for location data from any date.

For this reason, and contrary to the Government's arguments, Mr. Smith did not "limit" or "tailor[] his search" sufficiently that a "realistic probability existed that the examiner would find responsive evidence[.]"[2] Looking at the largest of over two hundred thousand images irrespective of their dates had no realistic probability of finding materials from one particular date. The Government's arguments to the contrary defy common sense—if one had 215,767 marbles of different sizes and colors, and only a handful those marbles were blue, there would be no realistic probability that the eight or ten largest-sized marbles would be blue.

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[1] Answer at 34.

[2] Answer at 27, 32 (internal quotations omitted).

All five reasons the Government provides in its attempt to explain why sorting the images by size was permissible fail. First, the Government argues that because Mr. Smith initially found less than 2,000 materials containing location data, he "conclude[d] . . . [that] the tool had not parsed the entire device[.]"[3] But the Record does not support this assertion. As Mr. Smith testified:[4]

> Q. Was anything during your analysis causing you concern that the data was not parsed correctly?
>
> A. No. But that was a concern for every case, that you always verify.

Thus, nothing about this particular search gave Mr. Smith reason to believe the phone had improperly parsed. He only began looking at the largest of 215,767 images irrespective of their date because that was his procedure "for every case[.]"[5]

Second, the Government argues Mr. Smith "had to find relevant evidence in the 215,767 images identified on Appellant's phone."[6] But needing to find evidence does not make viewing the largest-sized images reasonable.[7]

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[3] Answer at 35 (internal quotations omitted).
[4] J.A. at 588.
[5] J.A. at 588.
[6] Answer at 33.
[7] Answer at 33.

Third, the argument that "sorting by size would bring user-generated images to the top which were more likely to contain location data" fails. Sorting by size merely replaced images on Mr. Smith's screen that were exceedingly unlikely to contain location data from December 23, 2018 with other images that were also exceedingly unlikely to contain location data from December 23, 2018. Rather than advance his search in a manner that would have actually taken him closer to his goal, sorting by size merely allowed Mr. Smith to look at increasingly-private materials.

Fourth, the Government erroneously argues that "this method would send irrelevant internet generated images, which would not contain location data, to the bottom[.]"[8] Page 561 of the Joint Appendix—which the Government cites in support of this proposition—does not provide that internet-generated images would not contain location data.[9] Mr. Smith admitted that internet-generated images could download location data to one's phone.[10] He provided common examples of websites that store location data.[11] And even if internet-generated images were less likely to contain location data than photographs from December 23, 2018, Mr. Smith did not replace the images on his screen with photographs from December 23, 2018.

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[8] Answer at 33 (citing J.A. at 561).
[9] J.A. at 561.
[10] J.A. at 571.
[11] J.A. at 571 ("[M]aybe you're using things like Yelp or maybe Hotels.com. Some of those who can run passively in the background and then when the intent that, hey, I want to do a search, stop and get a room, it is much quicker than entering your location.").

Nothing in the Record indicates that internet-generated data would have been less likely to contain location data from the pertinent date than the largest of 215,767 images irrespective of their date.

Fifth, and finally, that "he sorted by size first to save time because then the larger, relevant images 'will stay at the top'" defies common sense.[12] As the lower court held, "since his intention was to 'set a filter to only show photos with metadata that contains location data,' that would obviate the need to sort by file size at all[.]"[13]

B. The cases the Government cited do not support Mr. Smith's search.

The eight federal circuits the Government cited do not, as the Government suggests, *per se* "permit human forensic analysis of digital files when aimed at uncovering relevant evidence."[14] And they do not support Mr. Smith's departure from the search authorization's particularly narrow date parameter.

The Government quotes the Tenth Circuit out of context. It wrote, "the *Loera* court held that when searching digital devices where the evidence sought may be located in numerous places, the 'most practical way to search [often] . . . is through an item-by-item review[.]'"[15] But reading this quoted sentence in its entirety changes its meaning. The sentence actually states, "In cases like this one, where the

[12] Answer at 33.
[13] *United States v. Shields*, No. 202100061, 2022 CCA LEXIS 448, *13-14 (N-M. Ct. Crim. App. July 27, 2022).
[14] Answer at 34.
[15] Answer at 23 (quoting *United States v. Loera*, 923 F.3d 907, 920 (10th Cir. 2019)).

electronic storage device is not well-organized and the most practical way to search it is through an item-by-item review, *there may be no practical substitute* for actually looking in many (perhaps all) folders[.]"[16] The court did not suggest that the most practical way to search digital devices is to conduct a manual and full review; rather, it explained that in some cases such review is necessary.[17]

The Tenth Circuit in both *Loera* and *United States v. Burgess* upheld searches of digital devices because, in those cases, a warrant authorized the agents to look at all files in the searched devices (unlike here, where Mr. Smith could only look at material from one date).[18] The court explained that the requirement of looking from the obvious to the obscure "should be used where possible[.]"[19] The Tenth Circuit explained that in such cases:[20]

> Respect for legitimate rights to privacy . . . requires an officer executing a search warrant to first look in the most obvious places and as it becomes necessary to progressively move from the obvious to the obscure. That is the purpose of a search protocol which structures the search by requiring an analysis of the file structure, next looking for suspicious file folders, then looking for files and types of files most likely to contain the objects of the search ***by doing keyword searches***.

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[16] *Loera*, 923 F.3d at 920.
[17] *Id*.
[18] *Id.* at 922; *United States v. Burgess*, 576 F.3d 1078, 1093 (10th Cir. 2009).
[19] *Loera*, 923 F.3d at 922 (discussing *Burgess*, 576 F.3d at 1094).
[20] *Burgess*, 576 F.3d at 1094 (emphasis added). To be clear, and as discussed further below, Appellant does not argue that *ex ante* limitations need to be applied.

The Government's Sixth Circuit quote from *United States v. Richards* is also provided out of context. The Government writes that *Richards* "hold[s that] investigators can 'open the various types of files located in the computer's hard drive in order to determine whether they contain [relevant] evidence[.]'"[21] But reading the entire sentence changes its meaning. The full sentence actually states that "*[s]o long as the computer search is limited to a search for evidence explicitly authorized in the warrant,* it is reasonable for the executing officers to open the various types of files located in the computer's hard drive in order to determine whether they contain such evidence."[22] Investigators can search for digital evidence where they are authorized—not wherever they want.

Like *Loera*, *Burgess*, and *Richards*, the other federal circuit cases the Government cited only permit agents to search where authorized and reasonably necessary.[23] And the Government's analysis of *United States v. McMahon* fails for

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[21] *Compare United States v. Richards*, 659 F.3d 527, 540 (6th Cir. 2011) *with* Answer at 34 n.3.

[22] *Richards*, 659 F.3d at 540 (6th Cir. 2011) (emphasis added).

[23] *United States v. Ulbricht*, 858 F.3d 71, 102-04 (2d Cir. 2017) (upholding a search where the warrant *authorized searching all files* and the sought-evidence "permeated Ulbricht's computer"); *United States v. Stabile*, 633 F.3d 219, 239-41 (3d Cir. 2011) (upholding a search because *the sought-evidence could have reasonably existed in the folders searched*); *United States v. Mann*, 592 F.3d 779, 783 (7th Cir. 2010) (upholding a search because the warrant *necessitated looking at all images in the device*); *United States v. Williams*, 592 F.3d 511, 523 (4th Cir. 2010) (upholding a search "because *the scope of the search authorized by the warrant* included the authority to open and cursorily view each file" (emphasis added)); *United States v. Miranda*, 325 F. App'x 858, 860 (11th Cir. 2009) (upholding a search where the

the same reason.[24] In *McMahon*, the search was upheld because "The search authorization was for . . . government CD ROMs. The special agent was justified in opening the binder because it was a place where CD ROMs might reasonably be kept."[25] In contrast, sorting 215,767 images in order of their size did not take Mr. Smith to a place where an image from December 23, 2018 might reasonably be kept.

Just because investigators in some cases were authorized to search all files does not mean they can do so in every case. Unlike the agents in the numerous cases the Government cited, Mr. Smith was bound by an exceptionally narrow search authorization. This search authorization is a major distinguishing fact—a limiting principle that does not apply to those other cases. It authorized Mr. Smith to only look for material from one particular date, and nothing else.

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agent "look[ed] at files authorized to be searched *by the warrant*" (emphasis added)); *United States v. Giberson*, 527 F.3d 882, 890 (9th Cir. 2008) (upholding a search because *the warrant required looking at all images on the device*); *United States v. Wong*, 334 F.3d 831, 838 (9th Cir. 2003) (upholding a computer search because the agent was "searching the graphics files for evidence of murder, *as allowed by the warrant*" (emphasis added)); *United States v. Walser*, 275 F.3d 981, 986 (10th Cir. 2001) (upholding a search where the agent "searched for relevant records in places where such records [*authorized to be searched for by the warrant*] might logically be found").

[24] Answer at 24 n.1 (discussing *United States v. McMahon*, 58 M.J. 362, 367 (C.A.A.F. 2003)).

[25] *McMahon*, 58 M.J. at 367.

C. The Government fails to explain how the reasonableness of Mr. Smith's search evolved.

The Government agrees that Mr. Smith needed to begin in the obvious and "'as it becomes necessary to progressively move from the obvious to the obscure.'"[26] And the Government concedes that Mr. Smith "moved to obscure places[.]"[27] But the Government fails to explain what necessitated Mr. Smith's transition to the obscure when an obvious path remained available. *Loera* provides that "the reasonableness of a search evolves as the search progresses and as the searching officer learns about the files on the device that he or she is searching."[28] The Government has not shown any such evolution. It does not explain what made it reasonable to look at the largest of 215,767 images irrespective of their date given that Mr. Smith could have applied, and later intended to apply, a date filter.[29]

The Government argues that "like the agents in *Garrison*, the Examiner reasonably relied on the 'information available to [him] at the time [he] acted[.]'"[30] But the officers in *Maryland v. Garrison* accidentally walked into the wrong apartment while believing they were in a different apartment.[31] In contrast, here,

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[26] Answer at 30 (citing *Burgess*, 576 F.3d at 1094).
[27] Answer at 35 (internal quotations redacted) ("The Examiner reasonably began searching in 'obvious' places and moved to 'obscure' places").
[28] *Loera*, 923 F.3d at 920 (emphasis added).
[29] *See* Answer at 33.
[30] Answer at 29.
[31] *Maryland v. Garrison*, 480 U.S. 79, 84 (1987).

Mr. Smith knew he could have applied a date filter, intended to later apply a date filter, but disregarded this obvious next step. Instead, he began looking at the largest-sized photographs—the "[t]he sum of an individual's private life[.]"[32] Doing so was not "reasonably directed at uncovering evidence."[33]

D. The Government misunderstands why the military judge's three factual findings were clearly erroneous.

First, regarding the military judge's factual finding that there was "no evidence to suggest that Mr. Smith was rummaging," the Government summarizes Appellant's argument as "he merely disagrees with the Military Judge[.]"[34] But that is not Appellant's argument. The military judge found that there was no evidence—at all—of rummaging. This is clearly erroneous because there is (at the very least) some evidence of rummaging.[35] That the military judge failed to comprehend that there was any evidence of rummaging demonstrates that he did not properly analyze or apply this issue. Mr. Peden's testimony that "[t]he contraband "wouldn't have

[32] *Riley v. California*, 573 U.S. 373, 394 (2014).
[33] *Loera*, 923 F.3d at 917.
[34] Answer at 37; J.A. at 691-92.
[35] The search authorization itself is evidence because it provides the extremely narrow date parameter that Mr. Smith disregarded. Mr. Smith's act of sorting the images by size prior to applying a date filter is evidence that he disregarded that date parameter. Finally, Mr. Peden's testimony that Mr. Smith must have scrolled down after sorting by size is also evidence of rummaging.

been visible without scrolling down" is at the very least some evidence of rummaging.[36]

Next, the Government argues that the military judge's finding that Mr. Smith saw the contraband "[d]uring the process of trying to sort the images by size and date" was not clearly erroneous.[37] But the Government does not address the fact that Mr. Smith was not sorting the images by size and date when he saw the contraband. Mr. Smith admitted he was going to "eventually" apply a date filter, but he "wanted to look at them first, see if there were a significant amount of photos with GPS data, and start filtering from there."[38] The Government argues that Mr. Smith was not able to take his next steps, but this argument actually underscores the clearly erroneous nature of the military judge's finding.[39] If Mr. Smith had not begun taking his next steps (searching by date), then he was not in "the process" of searching by date. Unless Mr. Smith had begun "the process" of searching by date, the military judge's finding of fact must be clearly erroneous.

Finally, the Government misunderstands the third clearly erroneous finding of fact when it writes that Appellant "fails to show how the Examiner went outside

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[36] J.A. at 638.
[37] Answer at 37; J.A. at 692.
[38] J.A. at 573, 586.
[39] *Compare* Answer at 37 ("Regardless of the order of his next steps, *which he was never able to take*" (emphasis added)) *with* J.A. at 692 ("*During the process* of trying to sort the images . . . Mr. Smith saw a suspected image" (emphasis added)).

'the scope of the CASS.'"[40] The clearly erroneous factual finding is that "Mr. Smith *attempted to* stay within the scope of the CASS."[41] Sorting 215,767 images in order of their size and only planning to apply a date filter after "see[ing] . . . a significant amount of photos" was not an attempt to stay within the scope.[42]

E. The military judge only considered the *methodology* proffered by Mr. Peden, not his testimony about the Cellebrite software's *capabilities*—a critical distinction.

Just because the military judge noted the *methodology* proffered by Mr. Peden does not mean he considered the discrepancy between the experts' testimonies regarding how many images could appear in the Cellebrite table view function.[43] There is a difference between a software's capabilities and its operator's methodology; the two have different meanings. The military judge never explained the discrepancy between Mr. Smith's claim to have seen ten images on his screen

[40] Answer at 37.
[41] J.A. at 694 (emphasis added).
[42] J.A. at 586.
[43] Answer at 12, 15, 28. Appellant's Brief mistakenly noted that the military judge did not discuss Mr. Peden at all, when it should have stated that the military judge did not discuss the scrolling discrepancy provided by Mr. Peden at all. *Compare* Appellant's Br. at 18 *with* J.A. at 673-95. Regardless, Appellant's position that the military judge "did not make any findings as to whether Mr. Smith's testimony was accurate" and did not "make any findings pertaining to Mr. Smith's decision to scroll through the images" remains accurate. *Compare* Appellant's Br. at 31-32 *with* J.A. at 673-95.

with Mr. Peden's explanation that the contraband "wouldn't have been visible without scrolling down."[44]

Moreover, simply referencing Mr. Peden seventeen pages after summarily writing that the military judge "considered . . . evidence" did not place the military judge's findings and analysis on the record with regard to this issue. The Government points to *United States v. Flesher*, and correctly notes that military judges do not have to provide dissertations in their rulings. But the gap in the *Flesher* judge's analysis is similar to the one here.

In *Flesher*, the defense filed a motion for a continuance that included a request to exclude a government expert's testimony.[45] The military judge sent an e-mail stating, "Re: the Defense motion for a continuance -- As I understand the issue, Ms. Falk [the government expert] is going to testify."[46] The military judge then proceeded to explain the contents of Ms. Falk's expected testimony, assuming her testimony would occur rather than explaining its admissibility.[47] This Court held that the military judge "did not provide any findings of fact, and did not apply the law to the facts to support his decision to admit Ms. Falk's expert testimony[.]"[48] "As a result, we are left with a limited understanding of the military judge's decision-

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[44] J.A. at 638.
[45] *United States v. Flesher*, 73 M.J. 303, 307 (C.A.A.F. 2014).
[46] *Id*. at 307.
[47] *Id*.
[48] *Id*. at 312.

making process and, accordingly, we give his decisions in this case less deference than we otherwise would."[49]

The same applies here. Like *Flesher*, where the military judge named the expert at issue and denied the defense motion, so too did the military judge here. But worse than *Flesher*, where the military judge indicated that he understood the specific issue (by stating that Ms. Falk would testify), the Record here does not indicate that the military judge was aware of this particular issue (whether Mr. Smith scrolled after sorting by size).

The military judge never provided any findings or analysis with regard to whether Mr. Smith scrolled after sorting by size. He referenced Mr. Peden by writing "the methodology proffered by the Defense expert[,]" but his use of the word "methodology" indicates that he viewed Mr. Peden's testimony as merely providing an alternative means of searching the phone, rather than challenging Mr. Smith's assertion of fact as impossible and therefore untrue based on the software's capabilities.[50] In the following sentence, the military judge wrote, "The Court disagrees, since the Fourth Amendment only requires that searches be conducted in a reasonable manner"—likewise indicating that the military judge viewed Mr. Peden as providing an alternative *method* of searching rather than challenging the

[49] *Id.*
[50] *See* J.A. at 691.

capability of Mr. Smith's search.[51] And the military judge's factual findings that there was "*no evidence* to suggest that Mr. Smith was rummaging" only further shows that the military judge failed to consider this issue at all, because Mr. Peden's testimony that "[t]he contraband "wouldn't have been visible without scrolling down" is at least some evidence of rummaging.[52]

Simply put, the Record does not show the military judge's decision-making process on this limited, yet critical, issue. Even though the military judge summarily stated that he considered all evidence, the Record does not show that he understood that Mr. Smith's claim of viewing ten images was challenged by Mr. Peden as being impossible. Thus, the military judge failed to notice this issue. He must therefore be afforded less deference on this particular issue.

F. Granting relief will not create *ex ante* limitations on future digital searches.

The Government does not understand Appellant's position when it argues that "Under Appellant's proposed regime, forensic examiners would only be able to use digital tools to search in certain ways[.]"[53] Appellant does not argue that *ex ante* search limitations need to be imposed on digital searches. Digital forensic examiners do not have to apply filters in every case. Rather, they have to search reasonably, moving from the obvious to the obscure when possible. Once the necessity of

[51] J.A. at 691.
[52] J.A. at 638 (emphasis added).
[53] Answer at 33.

looking at the obscure is established, such as in the federal cases the Government points to, an examiner can begin manually looking through all materials.[54] But examiners cannot disregard extremely narrow search authorization parameters when they are able to comply with those parameters.

Filtering the images was not the only way Mr. Smith could have attempted to comply with the search authorization. He could have sorted the images by date—a different means of looking at the images than sorting by size or filtering by date.[55] While sorting by date may not have been as obvious as filtering by date, it certainly would have been a much more probable (and therefore reasonable) means of finding materials from December 23, 2018 than organizing 215,767 images irrespective of their date. But Mr. Smith did not choose these far more obvious means of abiding by the search authorization. Instead, when he began to "see if there were a significant amount of photos[,]" he set aside the obvious path ahead of him, saved it for later, and unnecessarily plunged into increasingly private materials.[56]

G. The Government must be vigilant in this digital age.

The statements of Mr. Smith, his supervisor, and the Government indicate a collective unwillingness to keep pace with the rapid evolution of technology. Mr.

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[54] *See supra* n.23.
[55] *See* J.A. at 390 (demonstrating Mr. Smith was capable of scrolling through materials in order of their date rather than in order of their size).
[56] J.A. at 586.

Smith should have renewed his certifications to operate Cellebrite twice in the four years prior to conducting his search to keep up with Cellebrite's monthly-updated software. He and his supervisor sanctioned jumping directly into the obscure before looking at the obvious. And the Government likewise argues that investigators should operate based on the speculative presumption that historic failures to properly parse may occur again. This logic cannot be the basis for skipping the obvious and going directly to the obscure. When possible, investigators should always start in obvious places rather than unnecessarily intrude in private spheres.

The Cellebrite software is "designed to protect the right[s] and privacy of individuals[.]"[57] From 2010 to 2012, Cellebrite's error rate (calculated by testing hundreds of devices) dropped from ten percent to seven and a half percent.[58] This is hardly the "frequent[] fail[ure]" that the Government would have this Court believe.[59] The Cellebrite company explained that its "anomalies were rare," and this statistic (which includes other types of errors in addition to parsing anomalies) applies to searches conducted seven years prior to the search in this case.[60] What was a "rare" anomaly on software updated monthly, which "for over a decade" had

[57] J.A. at 616-17.
[58] J.A. at 405.
[59] *Compare* J.A. at 405 *with* Answer at 35.
[60] J.A. at 405.

focused on extracting images from cell phones, must have been even rarer seven years later by the time of this search.

Four years of failing to renew Cellebrite operating certifications is a long time when considering the rapid evolution of technology in this digital age. *Loera*, the most recent federal case the Government cited (from 2019), discusses a search conducted in 2012—seven years prior to the search in this case. The Ninth Circuit in *United States v. Giberson* wrote, "We acknowledge that new technology may become readily accessible . . . to enable more efficient or pinpointed searches of computer data, and that, if so, we may be called upon to reexamine the technological rationales that underpin our Fourth Amendment jurisprudence in this technology-sensitive area of the law."[61]

Progress in this digital age requires increasing vigilance from law enforcement. *Loera*'s obvious-to-obscure when possible reasonableness approach does not need to be re-examined, and it should apply to the military and this case. A far more obvious approach was available for Mr. Smith. He could have, and he should have, looked there first. The Government relies on the outcomes of historic cases while forgetting the rationale underlying those cases. That rationale, applied today, does not sanction Mr. Smith's search—it condones it.

[61] *Giberson*, 527 F.3d at 890 (internal quotations, brackets, and citation omitted).

Mr. Smith's erroneous belief that "[m]y job is to analyze ALL DATA" threw reasonableness out the window.[62] He disregarded the search authorization's terms and the commanding officer's clearly conveyed intent. Mr. Smith's organization and its "unwritten policy of defaulting to manual review of data files, even where a search authorization contains specific search limitations[,]" stands by his deliberate behavior.[63] They do this in "every case"—irrespective of search authorization limitations.[64] This is precisely what the exclusionary rule is designed to prevent.[65] This Court's decision will set the tone for the future of digital searches across the armed forces. Fourth Amendment protections will lose meaning if the most inherently private space in the digital era—"[t]he sum of an individual's private life"—is not safeguarded.[66]

[62] J.A. at 113.
[63] *Shields*, 2022 CCA LEXIS at *15.
[64] J.A. at 588.
[65] *United States v. Conklin*, 63 M.J. 333, 340 (C.A.A.F. 2006) ("The fundamental purpose of the exclusionary rule is to deter improper law enforcement conduct.").
[66] *Riley*, 573 U.S. at 394.

Respectfully submitted.

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Certificate of Compliance

This Reply complies with the type-volume limitations of Rule 24(c) because it does not exceed 7,000 words, and complies with the typeface and style requirements of Rule 37. This Reply contains 4,315 words. Undersigned counsel used Times New Roman, 14-point type with one-inch margins on all four sides.

Certificate of Filing and Service

I certify that the foregoing was filed electronically with this Court, and that copies were electronically delivered to Deputy Director, Appellate Government Division, and to Director, Administrative Support Division, Navy-Marine Corps Appellate Review Activity, on February 9, 2023.

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