

2023 SW 000008 WCA

V.C. Chase

STATE OF FLORIDA )  
12TH JUDICIAL CIRCUIT ) SEARCH WARRANT (META/INSTAGRAM)  
COUNTY OF SARASOTA )

THIS ORDER IS ISSUED PURSUANT TO SECTION 92.605, FLORIDA STATUTES. A  
RESPONSE IS DUE WITHIN 20 BUSINESS DAYS OF RECEIPT OF THIS ORDER  
UNLESS A LONGER TIME PERIOD IS STATED HEREIN.

IN THE NAME OF THE STATE OF FLORIDA, to all and singular the Sheriffs and  
their Deputies, the Director of the Florida Highway Patrol and his Troopers, the  
Commissioner of the Florida Department of Law Enforcement and his Designees, the Director  
of the Florida Fish and Wildlife Conservation Commission and his Officers, and  
Constables, Municipal Police Officers and State Attorney's Investigators all acting within their  
jurisdiction;

WHEREAS, I have received affidavit for search warrant, on this date made before  
me by the Affiant, Detective Megan Buck prepared same in his capacity as a law  
enforcement officer; and

WHEREAS, Detective Megan Buck having been placed under oath and having  
sworn to the facts as stated therein, and having examined the said facts set forth in support  
of said application for search warrant, and the facts contained therein which are now  
incorporated herein by reference and made a part of this Warrant, and;

WHEREAS, said facts so made known to me by such affidavit as set forth, have  
caused me to certify and find that there is probable cause to believe that the laws of the  
State of Florida relative to: Video Voyeurism controlled by Florida State Statute(s)  
810.145(6)(b) have been violated by Chrisitan Ziegler (w/m, DOB: 5-27-83, SSN: [REDACTED])  
[REDACTED] and that evidence of the crime is currently located at or within;

Any and all stored electronic communications or files associated with the user accounts  
identified as User Accounts Identified by User ID(s):

1. <https://www.instagram.com/chrismziegler/>  
Username: chrismzielger

This account is under the control of:  
META PLATFORMS, Inc.  
1601 Willow Road  
Menlo Park, CA 94025

THEREFORE, the Court having found that Meta is an out-of-state corporation that  
provides electronic communication services or remote computing services to the public  
and pursuant to Florida Statutes § 92.605 and § 934.23, as well as the United States Code  
18 U.S.C. § 2703, and California Statute § 1524.2, a Judge of the Circuit Court of Florida

has jurisdiction to issue a search warrant for an Instagram account, consequently these presents are to command you, with the proper and necessary assistance, either in the day time or in the night time, as the exigencies of the situation may demand or require or on Sundays, or holidays, to enter the said Instagram account described above, and diligently search said account and seize as evidence any of the following:

**PROPERTY TO BE PROVIDED BY META, INC.**

1. Any and all stored electronic communications or files associated with the user accounts identified as User Accounts Identified by User ID(s):

1. <https://www.instagram.com/chrismziegler/>  
Username: chrismziegler

and any related accounts concerning the same account subscribers or users, since the creation of such account until the present time of this affidavit, including the content and header information of email messages and any attachments, user contact information, group contact information, IP logs, and instant messages(Instagram Messenger) to include vanish mode messages, whether drafted, sent, received, opened or unopened, read or unread, and/or forwarded, and any buddy lists or contact lists, calendars, transactional data, account passwords or identifiers, and/or any other files related to those accounts.

And any related accounts concerning the same account subscribers or users, since the creation of such account until the present time of this affidavit, including but not limited to the content and header information of email messages and any attachments, user contact information, group contact information, IP logs, and instant messages, vanish mode messages, whether drafted, sent, received, opened or unopened, read or unread, and/or forwarded, and any buddy lists or contact lists, calendars, transactional data, account passwords or identifiers, and/or any other files related to those accounts.

2. Any Neoprints linked to or associated with the above Instagram user account. A Neoprint is an expanded view of a given user profile. It contains their current profile information, and all wall postings and messages to and from the user that have not been deleted by the user.

3. Any Photoprints or videos linked to or associated with the above Instagram user account. A Photoprint is a compilation of all photos uploaded by the user that have not been deleted, along with all photos uploaded by any user that has the user tagged in them.

4. Records concerning the identity of the user of the above-listed user account(s); consisting of name, postal code, country, e-mail address, date of account creation, IP address at account sign-up, logs showing IP address, and date stamps for account accesses.

5. Journal entries, Neoprints, comments, and the contents of private messages in the above-listed user's inbox, sent mail and trash folders related to the above-listed user account(s);

6. Any images, videos, or chats within the vanish mode setting of the above account.

**YOU ARE FURTHER DIRECTED** to bring the property so seized before a court having jurisdiction to be disposed of and dealt with according to law and make return of your doings under this warrant to me or to my designated clerk, and give proper receipts for any property taken hereunder, and deliver a copy of this warrant to the person at whom directed.

**GIVEN UNDER MY HAND AND SEAL THIS DAY**

12/8/2023

DATE

A handwritten signature in black ink, appearing to read "Thomas E. K...", written over a horizontal line.

Thomas E. K...  
Circuit Judge

CIRCUIT JUDGE

SIGNATURE/ELECTRONIC SIGNATURE

IN THE CIRCUIT COURT OF THE 12<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR  
SARASOTA COUNTY, FLORIDA

APPLICATION FOR COURT ORDER/SEARCH WARRANT COMPELLING  
PRODUCTION OF META/INSTAGRAM RECORDS

In Re; A Criminal Investigation  
A user account identified by User ID:

Case No. 23-048937

1. <https://www.instagram.com/chrismziegler/>  
Username: chrismziegler

This account is under the control of:  
Meta Platforms, Inc.  
1601 Willow Road  
Menlo Park, CA 94025

BEFORE ME, a Judge of the Circuit Court, personally or by sworn attestation appeared Detective Megan L. Buck a duly sworn law enforcement officer of the Sarasota Police Department, State of Florida, who after being first properly sworn, makes application for an order compelling Meta to search for, and obtain, and to provide information and data in the above described Meta account to the applicant Detective listed above, who states under oath that he has sufficient grounds to believe and does believe that the laws of the State of Florida have been violated, to-wit:

The laws prohibiting Video Voyeurism, controlled by Florida Statute 810.145(6)(b) have been violated by the Instagram user account described below.

THE DESCRIPTION OF THE USER ACCOUNT is as follows;  
A user account identified by User ID:

1. <https://www.instagram.com/chrismziegler/>  
Username: chrismziegler

**GROUND FOR ISSUANCE:**

The following grounds for issuance of the Order Compelling Production of Instagram Records, as required by Florida Statutes exist, to-wit: the evidence sought is relevant to proving the above-described offense has been committed and such evidence is contained within the Instagram account described above. See Florida Statute 933.02(3). Meta is an out-of-state corporation that provides electronic communication services or remote computing services to the public. Your Affiant seeks to seize the below-described evidence pursuant to Florida Statute § 92.605 and § 934.23, as well as the United States Code 18 U.S.C. 2703, and California Statute § 1524.2, which compel out-of-state electronic communication service or remote computing service that provides such services to the

public to provide information requested pursuant to search warrants, court orders or subpoenas issued in the State of Florida.

**FACTS STATED IN SUPPORT OF APPLICATION:**

Your Affiant has sufficient reasonable grounds to believe that the above-named crime has been committed and that evidence in the form of electronic communication and or data held or possessed by Meta may be discovered and this detective/officer believes probable cause exists for the following reasons:

1. Your Affiant is a Detective/Officer with the Sarasota Police Department and is currently assigned to the Criminal Investigations Division. Your Affiant has been a police officer for approximately 18 years and has been assigned to the Criminal Investigations Division for 11 years. Your Affiant is charged with the responsibility of investigating crimes such as murder and all other crimes against persons or property.
2. Your affiant has been employed as a Task Force Agent with the Federal Bureau of Investigation (FBI) since February 2013, under the Child Exploitation Task Force. Your affiant is also part of the Internet Crimes Against Children Task Force (ICAC) since February 2013. As a Task Force Agent, I am authorized to investigate violations of the laws of the United States and to execute arrest and search warrants issued under the authority of the United States. The FBI Child Exploitation Task Force and the ICAC Task Force investigate the sexual exploitation of children. Your affiant has had training in investigating cases regarding the sexual exploitation of children, including conducting online investigations of the distribution and possession of child pornography through peer-to-peer networks. I have made arrests, conducted searches pertaining to these types of investigations, and testified in numerous trials regarding child pornography/child exploitation. I have attended specialized training involving computers and child exploitation. I have participated in the execution of numerous search warrants and assisted in seizing evidence of various criminal violations. Many of the search warrants I have dealt with involved the use of computers to receive, distribute, and possess child pornography.
3. The Sarasota Police Department is investigating the crime of Video Voyeurism committed by Christian Ziegler (w/m, DOB: 5-24-83, SSN: [REDACTED]). This warrant, if granted, would enable the identification of possible suspect(s) to this crime. Affiant does provide the following information to support the issuance of this warrant:
4. On 10/04/23, the victim [REDACTED] reported she had been sexually assaulted by Christian Ziegler on 10/02/23. The victim was treated and examined at Sarasota Memorial Hospital where a sexual assault kit was completed. The sexual assault occurred at the victim's apartment [REDACTED].  
[REDACTED]

5. 10/05/23, Detectives began the investigation which revealed the following. The victim and Christian Ziegler have known each other for twenty years. On 10/02/23, the victim and Christian Ziegler agreed to have a sexual encounter that included Christian's wife Bridget Ziegler. When the victim learned that Bridget could not make it, she changed her mind and canceled with Christian. On 10/02/23, the victim opened her apartment door to walk her dog and Christian was standing outside in the hallway. Christian entered the apartment, bent the victim over the bar stool, and vaginally penetrated her with his penis. The victim advised Christian did not wear a condom, and he stated "I'm leaving the same way I came in." The victim said she, Christian and Bridget were sexually involved one time over a year ago at their house. The victim stated that when Christian came over, she was not in a place to consent because it was her day off and she had been drinking Tequila all day. The victim advised she called her twin sister [REDACTED] and told her she was raped. [REDACTED] immediately went to the victim's house.
6. Detectives interviewed [REDACTED] who confirmed her sister called her and told her she was raped but did not tell her who did it. [REDACTED] said her sister (victim) was very emotional and distraught.
7. On 10/24/23, Detectives viewed the video surveillance footage from the victim's apartment complex. The video captured Christian Ziegler arriving in his gray Ford truck bearing FL., tag SRQGOP on 10/02/23, at 1429 hours. Christian immediately entered the apartment complex and is seen coming off the elevator and driving away in the parking lot at 1507 hours. Christian was wearing dark shorts and a red shirt.
8. As part of the investigation, Detectives performed a digital extraction on the victim's cell phone. Detectives located several digital messages from Christian to the victim on 10/02/23 starting at 0729 hours. In the messages, Christian told the victim to go to Instagram. The victim said Christian liked to use Instagram because he conceals the messages using vanish mode.
9. In another message he asked the victim for her address and told her they were driving around referring to him and Bridget. Christian continued sending the victim messages, but she did not respond in a timely manner. When the victim finally responded she asked who was coming. At 1412 Christian said "Prob just me this time now. Was ready at 1:30." Christian was referring to Bridget being ready at 1:30. At 1424 hours, the victim responded "Sorry I was mostly in for her" referring to Bridget.
10. On 10/27/23, Detectives learned that Christian was trying to contact the victim by sending her messages via Instagram. Detectives and the victim began communicating with Christian via controlled/recorded messages. The following is a summary of the communication:

- Victim: I'm not okay with what happened the other day between us.
- Christian: Oh. That's not good. You are my friend. Known ya for like twenty years now. Lol. Note: Christian goes on to talk about how long they have been friends.
- Victim: Yeah I know but that was not cool and you didn't bring her and then did that to me.
- Christian: She was in. Then couldn't because no response. She said in next time. But I understand. Your my friend I actually like you as a person, so sorry you got upset, but I can leave you alone if you prefer. Note: Christian then tried to change the conversation to getting his hair cut.
- Victim: I don't know if I can do that anymore after what you did to me last time it freaked me out.
- Christian: Ok. Well, sorry. Not the intention. I want you to be happy and not have drama. You have dealt with enough BS. Note: Christian again tried to change the subject by talking about getting a haircut.
- Victim: I have not been able to work since you came over.
- Christian: I am pretty loyal to my friends. Tried to call. Hard to text. How can I help?
- Victim: I really can't even talk to you right now.

During the messaging, Christian continuously asked how he could help, and the victim responded, "You caused this. You can't help me." Christian repeatedly referred to the victim as his friend in an effort to minimize the situation, he would deflect by trying to change the subject when confronted.

- Victim: I'd prefer you to tell me why you think what you did was okay?
- Christian: Where r u? Wanna meet and chat? Worried about you. You are my friend.
- Victim: Hell no not after what you did to me. Do you not understand I am terrified of you? Christian responded that he had to go soon.

Christian then began calling the victim. The calls were audio recorded.

In the first phone call the victim told Christian he hurt her when he came over. Christian said he did not think that was the case and if she was upset, he did not need her upset. Christian tried to change the subject, and the victim asked why he did that. Christian said he was not trying to start any issues, and she knows who he is. Christian asked the victim if she wanted him to leave her alone. The victim said she needed him to know that he hurt her. Christian responded by saying he would leave her alone.

In the second controlled phone call, the victim called Christian back. When he answered the phone, the victim asked him why he forced her to have sex with him when she never wanted to. Christian said he has never done that then said he had to go because some guy was giving him a hard time. Christian asked the victim if she wanted him to call her later and she said no.

In the third controlled phone call. Christian called the victim. Christian started asking the victim what she was going through. The victim told Christian he sexually assaulted her. Christian said, "Those are big words, please don't, no I didn't. You invited me in, that's it. I did not at all, and I never want you to feel that way." Christian went on to say the victim was his friend and asked her what she needed. Christian asked the victim if she needed financial help or anything else. Christian asked the victim what the issue was. The victim responded twice that he was the issue. Christian told the victim she was his friend, and he apologized for whatever is going on. Christian said he did not need any drama, and he did not want to create any issues for her, and if she was upset with him, he would leave her alone. Christian told the victim she was a good person, and he would leave her alone. The victim asked Christian to help her understand why he came over. Christian responded that he thought she wanted him to come over. The victim said no, I told you not to. Christian said that's not true. The victim asked Christian to acknowledge that he has been using her all these years. Christian said he was not going to acknowledge that, and he asked her if she was recording him. Christian said the victim was trying to get him on record saying something. Christian once again asked the victim what he could do to help her. The victim told Christian to leave her alone. End of call.

11. On 11/01/23, Detectives interviewed Bridget Ziegler. Bridget confirmed that she knew the victim through her husband. Bridget confirmed having a sexual encounter with the victim and Christian over a year ago and that it only happened one time.
12. On 11/01/23, Detectives interviewed Christian Ziegler at his residence in reference to the allegations.
13. On 11/02/23, Detectives interviewed Christian Ziegler and his attorney Derek Byrd's office. Ziegler stated he took a video of the sexual encounter with the victim on 10/02/23, the date of the alleged sexual battery. Ziegler stated the sexual encounter was consensual. Ziegler showed detectives the 2.5-minute-long video of the sexual encounter. He stated that the sexual encounter was consensual. Byrd made mention of a message (on Instagram vanish mode) between the victim and Ziegler where the victim asked him if he showed his wife the video.
14. Detectives spoke with both the victim and Ziegler's wife. The victim did not give Ziegler consent to take this video of them having sex. Neither of Ziegler's wife or the victim knew anything about this video that had been taken of the sexual encounter on 10/02/23, and neither had seen the video of this encounter.
15. Based on the above information, Affiant has reason to believe that evidence of the crime will be found within the Instagram account belonging to Christian Ziegler; Username: **chrismzieger**.



16. Instagram is a social networking website where users can post comments, share photographs and post links to news or other interesting content on the web, chat live, chat in vanish mode, and watch short-form videos. Shared content can be made publicly accessible, or it can be shared only among a select group of friends or family, or with a single person.
17. Based on the above-mentioned facts, your Affiant believes that probable cause exists to show Instagram User **chrismzieger** has utilized Instagram to commit the crime of Video Voyeurism.
18. Your Affiant believes that valuable evidence will be located within the suspect's Instagram account which will provide additional information about his criminal activity.

Because the out-of-state electronic communication service or remote computing service provider has no reasonable means to distinguish evidence of the crimes from any other records contained within the sought-after account, your Affiant seeks to compel the service provider to seize a copy of all records pertaining to the account and provide the entirety of the records to your Affiant. Once your Affiant has obtained those records, your Affiant and/or other representatives of his/her agency shall conduct an actual search of the items obtained from the out-of-state electronic communication service or remote computing service provider in order to sort the evidence of the violations articulated above and specifically sought herein, which may be intermingled with innocent or innocuous documents or records.

On the basis of the foregoing facts, Affiant believes the following evidence may be found:

#### **INFORMATION AND DATA SOUGHT BY LAW ENFORCEMENT**

#### **PROPERTY TO BE PROVIDED BY META PLATFORMS, INC.**

1. Any and all stored electronic communications or files associated with the user accounts identified as User Accounts Identified by User ID(s):

1. <https://www.instagram.com/chrismzieger/>  
User Name: chrismzieger

and any related accounts concerning the same account subscribers or users, since the creation of such account until the present time of this affidavit, including the content and header information of email messages and any attachments, user contact information, group contact information, IP logs, and instant messages(Instagram Messenger) to include vanish mode messages, whether drafted, sent, received, opened or unopened, read or unread, and/or forwarded, and any buddy lists or contact lists, calendars, transactional data, account passwords or identifiers, and/or any other files related to those accounts.

And any related accounts concerning the same account subscribers or users, since the creation of such account until the present time of this affidavit, including but not limited to the content and header information of email messages and any attachments, user contact information, group contact information, IP logs, and instant messages, vanish mode messages, whether drafted, sent, received, opened or unopened, read or unread, and/or forwarded, and any buddy lists or contact lists, calendars, transactional data, account passwords or identifiers, and/or any other files related to those accounts.

2. Any Neoprints linked to or associated with the above Instagram user account. A Neoprint is an expanded view of a given user profile. It contains their current profile information, and all wall postings and messages to and from the user that have not been deleted by the user.

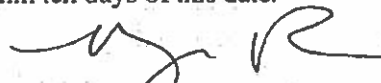
3. Any Photoprints or videos linked to or associated with the above Instagram user account. A Photoprint is a compilation of all photos uploaded by the user that have not been deleted, along with all photos uploaded by any user that has the user tagged in them.

4. Records concerning the identity of the user of the above-listed user account(s); consisting of name, postal code, country, e-mail address, date of account creation, IP address at account sign-up, logs showing IP address, and date stamps for account accesses.

5. Journal entries, Neoprints, comments, and the contents of private messages in the above-listed user's inbox, sent mail, and trash folders related to the above-listed user account(s).

6. Any images, videos, or chats within the vanish mode setting of the above account.

WHEREFORE, your Affiant respectfully requests that a Search Warrant be issued commanding all and singular the Sheriffs and their Deputies, the Director of the Florida Highway Patrol and his Troopers, the Commissioner of the Florida Department of Law Enforcement and his designees, Constables and Municipal Police Officers and State Attorney's Investigators acting within their jurisdiction, with proper and necessary assistance, to search the above described Instagram account in a manner consistent with F.S.S. § 92.605 and California Penal Code §15.24.2, by delivering said warrant via facsimile or U.S. mail to an authorized legal representative of Meta, and to seize any and all of the aforesaid property found by virtue of such Search Warrant and to list the property seized on a return and inventory, to be filed within this Judicial Circuit within ten days of this date.

  
Detective Megan Buck #1526


\_\_\_\_\_  
Affiant / Signature  
Electronic Signature

STATE OF FLORIDA     )

COUNTY OF SARASOTA )

The foregoing instrument was acknowledged before me this 8 day of December ,  
2023, by the individual whose name and signature appear above, who is personally  
known to me and who did take an oath.

Detective Amelia Wicinski #1862

  
\_\_\_\_\_  
Signature/Electronic Signature

Law Enforcement Officer

Notary Public, State of Florida

**RETURN TO SEARCH WARRANT**

RECEIVED THIS WARRANT on the 8 day of Dec,  
A.D., 20 23, and EXECUTED the same on the 8 day of Dec,  
A.D., 20 23 by READING THIS WARRANT TO, and delivering a true COPY hereof  
to one Christian Ziegler (or by leaving a  
COPY at the premises), and seizure of the item(s) described previously. Upon  
the completion of said SEIZURE, a WRITTEN INVENTORY OF THE PROPERTY  
seized was delivered to the aforementioned PERSON (or such a copy was left at the  
premises). A TRUE and CORRECT LIST of the item(s) seized is set forth in the following  
INVENTORY:

Refer to evidence sought on sw  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, Megan Buck, the officer by whom this  
WARRANT was executed, DO SWEAR that the above INVENTORY contains a TRUE  
AND DETAILED ACCOUNT of all the PROPERTY seized by me on said WARRANT.

[Signature]  
AFFIANT  
[Signature] #1770

(SEAL)

SWORN TO AND SUBSCRIBED BEFORE ME THIS THE 8 day of  
Dec, A.D., 20 23.