

Affidavit for Search and Seizure Warrant

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA
NORFOLK DIVISION

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH AND SEIZURE WARRANT

I, Special Agent Princess Osei-Adubofour, being duly sworn, depose and state as follows:

I. Background and Qualifications

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), currently assigned to the Cyber Crimes Division. I have been employed by the FBI for nine years and have received extensive training in cybercrime investigations, digital forensics, and electronic surveillance. I have participated in multiple investigations involving violations of the Computer Fraud and Abuse Act (CFAA), identity theft, wire fraud, and other cyber-related offenses.
2. This affidavit is submitted in support of a search and seizure warrant for the premises located at **3821 Crestline Drive, Norfolk, Virginia 23513**, including the residence, vehicles parked on the property, outbuildings, and any electronic devices or digital storage media found therein, as described in Attachment A.
3. As outlined below, there is **probable cause to believe** that within the above-described location exists evidence, contraband, and instrumentalities of violations of **18 U.S.C. § 1030 (Computer Fraud and Abuse Act)** and **18 U.S.C. § 1028A (Aggravated Identity Theft)**.

II. Investigation Summary

4. On June 15, 2025, the FBI received a report from **Leroy's Auto Dealership**, located in Norfolk, Virginia, regarding an unauthorized intrusion into their internal customer management system. Leroy's Auto Dealership maintains a proprietary database containing sensitive customer data including names, addresses, Social Security numbers, driver's license information, and financing applications.
5. According to the dealership's IT staff, the intrusion occurred between June 5 and June 10, 2025. During this time, an unauthorized user gained access to the dealership's internal network via a compromised employee login. Logs showed several large data exports and evidence of tampering with customer files including changes to loan application information and address data.
6. A forensic review of the dealership's server logs revealed that the unauthorized access originated from a residential IP address assigned to **Treyvon Malik Harris**, residing at **3821 Crestline Drive, Norfolk, VA**.
7. FBI investigators obtained subscriber information for the IP address through an administrative subpoena to the Internet Service Provider, Cox Communications confirming the account was registered to Harris at the Crestline Drive address.

III. Surveillance and Additional Evidence

8. FBI surveillance of 3821 Crestline Drive confirmed that Harris resides at the property. During a two-week observation period, agents observed Harris receiving multiple electronic packages from online retailers, including deliveries of external hard drives, SIM cards, and a Raspberry Pi kit (commonly used in network intrusion testing).
9. A former coworker of Harris, who wishes to remain anonymous, told investigators that Harris had recently claimed to have access to “thousands of credit files” from “a place that sells cars.” The same individual said Harris showed him screenshots of customer information, including addresses and financing terms.
10. On July 28, 2025, a known dark web marketplace listed a data dump for sale described as “Mid-Atlantic Auto Loan Applications, 2025.” Samples included real names, Social Security numbers, and vehicle financing terms that matched Leroy’s customer data. Blockchain analysis of a linked Bitcoin wallet shows recent transactions totaling over \$11,000 between June 20 and July 25, 2025.
11. Additionally, Harris’s public social media account includes photos posted on June 12, 2025, showing a high-end laptop with caption “Finally got what I need to start my *real* hustle.” The timestamp coincides with the immediate aftermath of the Leroy’s Auto breach.

IV. Items to Be Seized

12. Based on the above, there is probable cause to believe that the premises at **3821 Crestline Drive, Norfolk, VA**, contain evidence of a violation of **18 U.S.C. §§ 1030 and 1028A**, including:
 - Desktop or laptop computers
 - External storage devices (e.g., USB drives, hard drives, SD cards)
 - Mobile phones and SIM cards
 - Network equipment (e.g., routers, Raspberry Pi, wireless adapters)
 - Cryptocurrency wallets, hardware or paper storage of wallet keys
 - Documentation/digital files containing personal identifiable information (PII)
 - Notes, records, or files referencing the data breach or resale of customer data
 - Evidence of anonymization software or tools (e.g., VPNs, Tor browsers)
 - Communications, including emails, chats, or messages discussing or facilitating the intrusion

V. Conclusion

13. Based on the totality of the facts described above, I respectfully request that the Court issue a warrant authorizing the search of **3821 Crestline Drive, Norfolk, VA** and the seizure of evidence, fruits, and instrumentalities of violations of **18 U.S.C. § 1030** and **18 U.S.C. § 1028A**, as detailed in Attachment B.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Princess Osei-Adubofour

Special Agent, Federal Bureau of Investigation

Date: August 8, 2025