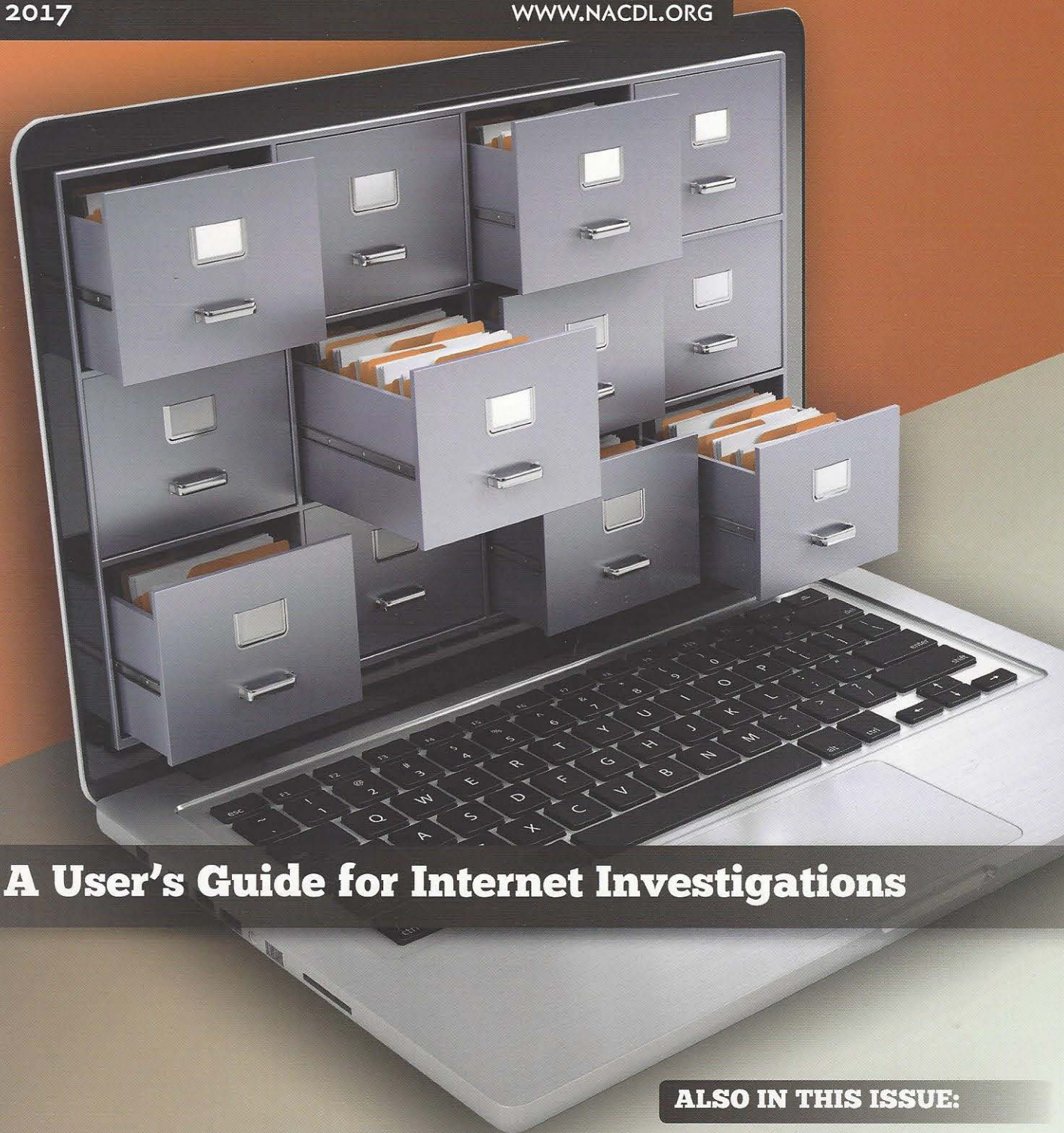


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## **A User's Guide for Internet Investigations**

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## I Know What You Did Last Summer: A User's Guide for Internet Investigations

**T**he United States saw 166 exonerations in 2016, easily breaking the previous record set in 2015.<sup>1</sup> As exonerations provide greater insight into investigative errors and oversights, counsel's mandate under *Strickland v. Washington*<sup>2</sup> to conduct a "reasonable investigation" has evolved with investigative tools and methods. These tools include the internet; a reasonable investigation surely requires deployment of tools that are literally at counsel's fingertips.<sup>3</sup>

The authors work closely with the Midwest Innocence Project and other attorneys in the investigation of prisoner claims of actual innocence, and an organized search of online sources of information has opened valuable avenues of investigation, even in cold cases.<sup>4</sup> One team asked for help finding a witness whose trail had gone cold more than a year earlier; it took only a few minutes to find a photograph the witness had uploaded to MySpace.com two hours earlier, and the photograph's digital file included GPS data placing the witness in a trailer park near Dallas, Texas. The cold trail was warm again, and the elusive witness was found. In

another case, a Google Maps camera car happened to be passing a witness' house as he was face-down in handcuffs on the hood of a police car — good information to know. Yet another case involved a claim of ineffective assistance by trial counsel whose performance suggested impairment by substance abuse. The lawyer's bankruptcy filing, found online, included a claim by an alcohol rehabilitation center for in-patient treatment. The center's bill included admission and discharge dates, establishing that trial counsel checked into rehab the same day the jury found his client guilty. These are but a few examples of useful information discovered with an organized internet investigation.

Even if an internet search does not produce dramatic new evidence, it always makes field investigation more efficient and productive. Armed with witnesses' addresses, employment, photographs, relationships, Google maps, and other information, the team can make informed choices about which witnesses to interview first, what questions need to be asked, and what potential problems await them in the field. This article describes the processes and tools that are accessible to any practitioner and can be incorporated into standard investigative practices. Used wisely, internet investigation has tremendous potential to produce useful results and increase the effectiveness and efficiency of field investigation. The benefits are significant enough to make internet research a routine part of any criminal case investigation. Further, if done properly and consistent with professional ethics, there is minimal risk of mistakes that could jeopardize an ongoing investigation, making this an ideal activity for clinical students, summer associates, and volunteers.

BY SEAN D. O'BRIEN AND QUINN C. O'BRIEN



## Preparation

Effective internet investigation begins with a case summary, including the prosecutor's theory of guilt, a description of the crime, a summary of the evidence introduced at trial by each side, the defense theory at trial, appellate opinions and judicial findings, and the evidence presently pointing to innocence. It is also helpful to create a "cast of characters," a spreadsheet that lists all known witnesses connected to the case, with known vital statistics (race, date of birth, social security number, address history and last known address), a notation indicating whether they have been interviewed by the police, trial counsel, or current team, relationship to other witnesses and the client (friend, family, employer, cell mate, etc.), and a two- or three-sentence narrative describing the witness's role in the case (e.g., "eyewitness who saw shooting from barber shop across the street and picked client from a video lineup"). Photographs of witnesses, evidence, and crime scenes are also helpful. The authors recommend the use of case management software, such as Lexis-Nexis CaseMap, to track and organize the large amounts of data that will be produced.

Because integrity of work product is essential to any investigation, counsel must observe ethical obligations that govern interaction with witnesses and the duty to protect client confidentiality and work product privilege.<sup>5</sup> For example, it is unethical to "friend" a witness on social media for the purpose of accessing information that the witness exposes only to friends or family. Counsel cannot avoid these ethical obligations by delegating functions to non-lawyer agents.<sup>6</sup> Information regarding the search and its findings falls within the work product privilege, which is best protected if the investigation remains undetected. It is important that the subject of the investigation not be tipped off that an investigator will soon appear on his doorstep; the most effective investigation relies on in-person cold calls by the investigator. Therefore, it is counter-productive to "friend" subjects on social media or interact with subjects by telephone or e-mail.<sup>7</sup> Internet investigators are merely passive observers and collectors of information that is available on the internet to any member of the public with ordinary computer skills. Defense internet investigators are not hackers, and this is not a phishing exercise. The investigation should leave no footprints and activate no alarms. Invisibility is the

objective. Familiarity with how the social media site operates is therefore important. Will the subject of the investigation be notified who has viewed his or her profile?<sup>8</sup>

Conducting an internet investigation does not require expertise in computer forensics or the architecture of the internet. Average computer skills are sufficient for this undertaking. Virtually anyone with a computer and an internet connection can be trained to do it. No expertise is necessary to find publicly accessible data. The investigation simply accesses multiple sources of data that include government sites, social media aggregators, social media sites, libraries, and schools. It is easy when one thinks about how to collect data — what information is kept, who keeps it, how it is kept, and how it might be useful to the client.

## Sources of Data

Any attempt to publish a list of links will be obsolete the day it is printed. There are books and sites available that purport to do that.<sup>9</sup> Examples of such websites are included in the endnotes of this article, but this exercise is about more than plugging names into a checklist of databases. Counsel should think creatively about potential sources of data. Keeping abreast of social media app download trends is a good start. Planning the investigation should always include venue-specific sources of data, including county assessor's offices, campaign filings, online court dockets, corporate and tax filings, recorder of deeds, and other local institutions. This article includes a discussion of a few specific sources to help counsel get started.

### Social Media Apps

Preferences for social media platforms vary with demographics, particularly age. As this article goes to print, some of the more popular social media apps and sites include the following:

- |                      |                    |                  |
|----------------------|--------------------|------------------|
| • <b>Blogspot</b>    | • <b>MySpace</b>   | • <b>Tinder</b>  |
| • <b>DeviantART</b>  | • <b>Picasa</b>    | • <b>Topix</b>   |
| • <b>Facebook</b>    | • <b>Pinterest</b> | • <b>Tumblr</b>  |
| • <b>Google+</b>     | • <b>Reddit</b>    | • <b>Twitter</b> |
| • <b>Instagram</b>   | • <b>Snapchat</b>  | • <b>YikYak</b>  |
| • <b>LiveJournal</b> | • <b>SnapFish</b>  |                  |

Apps enter and exit this list almost daily. Because social media is a rapidly changing environment, the authors periodically look for new social media apps among top downloads from the App Store.

### Finding Internet Sources: Helpful Tips

A list of links would be obsolete the day of publication due to the nature of the internet. Instead, here are tips on how to search for useful websites:

- ❖ Government (.gov and .org) sites are more reliable for public record searches than .com sites. Commercial sites often sell information that is available for free on a .gov site database.
- ❖ Remember that Google can be searched using natural language and Boolean search terms.
- ❖ Google searches can be targeted to search specific social media sites by entering "[search term]: [domain, e.g. LinkedIn.com]."
- ❖ Check the App Store for popular social media downloads to see what is trending this week.
- ❖ If the investigation hits a roadblock, Investigative Reporters and Editors, Inc., regularly updates its log of searchable internet databases on the National Institute for Computer-Assisted Reporting (NICAR) page, The NICAR Net Tour, [www.ire.org/nicar/nicar-net-tour/](http://www.ire.org/nicar/nicar-net-tour/).



## Google

Google and similar search engines are a great starting point for investigation, with emphasis on the word “start.” Searches should always go well beyond popular search engines. Google Chrome has a useful “incognito” feature that provides limited protection against cookies, advertisements, and saved browser history. Counsel should play with the “advanced” search settings to learn to refine search terms, and become familiar with Google hacks that can increase the efficiency of the investigation. Google also has advanced image search capabilities, including facial recognition software. The user can drag an image file and drop it in the Google search bar, and Google will search for that and similar images, potentially revealing a social media or other site with a similar image. Understanding the capabilities and limits of a web browser will help counsel use it to its fullest potential.

Depending on the case, counsel might start with the scene of the crime, and ask, “What can we learn about it on the internet?” Google Maps can give the location, a satellite view with reasonably high resolution, in many cases a street view, and individual residences or businesses — a virtual crime scene tour. Addresses might yield results as Google search terms, but many of the resulting links will be internet address sites that charge fees or are spam-traps. The authors discourage use of such sites; it is better to use reputable, tried-and-true web services for such purposes.<sup>10</sup>

More useful information might be available in sites that internet search engines do not crawl. The databases contained within these sites are sometimes called the Hidden Web. It sounds more sinister than it is; no hacking is involved. For example, Google may be able to find a county website, but the user must go to that website and use its internal search engine or database to find the county clerk’s marriage records database. The clerk’s database, unsearchable by Google but still available on the internet, is part of the Hidden Web.<sup>11</sup>

## Public Documents

Local government offices often have websites that are searchable for specific names, addresses, or transactions. The recorder of deeds, county clerk or county assessor may have searchable databases that allow users to search by address. From an internal site search of the address of a crime scene or witness residence, one can go to public documents that will indicate current owners, lienholders or taxpayers

associated with that parcel of real estate. If transaction documents are online, they may have other addresses and phone numbers. A local Bureau of Vital Statistics may have accessible birth certificates, marriage licenses and death certificates that may be useful to locate witnesses and determine relationships to persons, conditions, or events. A recorder of deeds may have plat maps that might make useful exhibits or reveal the history of a neighborhood, which could be especially useful in a cold case. The county assessor may also have personal property records regarding boats, cars, and aircraft that may generate useful investigative leads. Knowing what car a witness drives can indicate whether a subject is telling the truth about whether the owner of that car is at home when the investigator comes calling. Planes and boats are good clues to income level and secondary locations that a subject may frequent, and could lead to additional records that might be helpful, such as FFA flight plans relating to a particular aircraft.

Court records are nearly always fruitful sources of data for an investigator. Probate Court records may provide clues regarding civil commitments, though such filings are often legally closed to public inspection. They can also be useful when exploring the distribution of the decedent’s assets. Online dockets and pleadings in decedents’ estates will be full of names, relationships, and contact information. Civil filings may reveal financial problems, debts, divorce proceedings, or landlord/tenant disputes. Criminal records will disclose pending charges, convictions, docket entries and pleadings, but privacy laws may limit access to dismissals or acquittals. An internet search for criminal records is by no means comprehensive. It will simply indicate where the investigator will need to go to gather files when his or she is ready for field investigation.

State government sites will also be useful.<sup>12</sup> Occupational licenses and registrations may yield useful identifying information. For example, if the crime occurred in front of a barber shop or restaurant, occupational licenses, liquor permits, board of health filings, and other searchable databases may identify owners and employees to question about events. The secretary of state typically has searchable online business databases. The denial or suspension of a professional license may also come with information about the reasons for that denial or suspension, which may lead to criminal or civil court cases. The authors have prepared a partial list of such links for

Kansas City, Missouri, as an example of local web-based data that are readily accessible for free.<sup>13</sup> A little research can quickly produce a similar list of useful sites in any jurisdiction in America.

Government at all levels keeps extensive data about more than just taxes and regulations. The Department of Natural Resources keeps records about parks, natural disasters and other outdoor occurrences. Photographs taken by park rangers are also public records, and make excellent demonstrative exhibits. The National Oceanic and Atmospheric Administration (NOAA) keeps extremely detailed weather statistics, and has an archive dating back to the 1800s. Utilities keep public information about power outages and repairs, water quality, gas leaks, etc. The Environmental Protection Agency (EPA) keeps statistics on the chemical content or toxicity levels of public water sources, soil, and air. Law enforcement organizations are required by law to keep and publish extensive crime statistics. Fire and EMT services must keep public response times and locations available. Census data can reveal a subject’s race, family members, income level and neighborhood. The amount of publicly available government data is staggering; one only has to think a little creatively about where to find it.

## Public Document Aggregators

Several online services have already done much of the investigator’s work. The most widely used — and the most expensive — is Accurint, a public access document aggregator that is searchable by name, address and social security number.<sup>14</sup> It is considered the gold standard by private investigators because, where accessible, it includes utility and lease records. Lexis People Finder also aggregates public documents and is searchable by name and geographic area — town, city, and state. Each service allows the input of more data to refine results — date of birth, approximate age, social security number, etc. It can sometimes be a challenge to figure out which of multiple John Does is the John Doe connected to the investigation, and if counsel identifies the correct subject, multiple address/contact options may appear. Interpreting results can be like reading tea leaves unless the investigator has more information that helps distinguish between the target and multiple distracters. Lexis also includes a feature identifying individuals who may be related to the individual or address being searched, such as family members, landlords, or mortgage holders. Often,



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entries are linked to documents such as real estate deeds or tax assessment records. Associates, family, address history and other information can narrow results and increase the efficiency of field investigations. Searching the aggregator sites is not a substitute for searching individual government agency sites; not all licenses or registrations are captured by aggregators. Think of aggregators as secondary, or even tertiary, sources; investigators must still go to the primary source to obtain useful data.

Accurint is favored by investigators because, in addition to public documents, it accesses documents related to a subject's credit worthiness, such as utility or licensing records. Accurint is also an excellent way to investigate address history, which may indicate other jurisdictions that need to be explored for that witness, or reveal potential romantic or familial relationships when an address history is shared by more than one witness.

Like all aggregators, however, the data found is only as accurate as the person entering that data. A search within an aggregator should account for different spellings for a name, or common typos. Multiple searches may cost money, so careful thought should go into every search. And because there may be typos

and spelling errors in the original databases crawled by the aggregators, a search of the original source is always necessary. Aggregators serve as tools to show where to look for further information. Aggregators are not primary sources, and should not be treated as such.

### Court Records

Many witnesses and persons of interest have been parties to criminal and civil litigation. Sometimes simply searching case law on Westlaw or Lexis for a witness's name will produce useful results. For example, Warren McCleskey was convicted and executed on the testimony of jailhouse informant Offie Evans, who was planted in McCleskey's cell to question him in violation of *Massiah v. United States*.<sup>15</sup> A Lexis search using the term "Offie w/2 Evans" produces, in addition to the *McCleskey* litigation, two other reported opinions of cases in which the government used him as an informant to obtain convictions, and a criminal prosecution against Evans.<sup>16</sup> Such information is relevant to the credibility of a witness and the integrity and constitutionality of the government's investigation methods.

An individual's litigation history can now be searched through publicly accessible online judicial databases such as PACER and Missouri's CaseNet. Most appellate and urban judicial systems have implemented docket systems accessible on the internet for little or no cost. Often, criminal court records are kept in conjunction with the Department of Corrections, such as the Kansas inmate search engine, KASPER. Every witness should be run through that kind of database in the relevant jurisdictions. Because investigation is not a linear process, the same search for a particular witness may have to be repeated as additional information, such as aliases or old addresses, is acquired.

### Social Media

Searching social media is by far the most interesting, revealing, and entertaining part of internet investigation. People post a lot of information about themselves on the internet, and not all are smart about protecting it from public access. For example, many Facebook users are enticed by various apps to post their date of birth. Posted information often includes academic history, employment, occupation, family connections, weddings, funerals, and other important life events. The authors and their students have found Facebook entries and Tweets about the very inci-

dents that they were investigating — very useful data to have. Facebook is constantly updating its user search functions, but there are a few Facebook search hacks that remain constant; searches by any name, phone number, and e-mail address. At the time this article is written, Facebook will search for people by employment, education, home town, and current city (provided the Facebook user has made this information public).

Photographs can be quite revealing and important. In addition to the picture itself, digital camera and mobile phone uploads may include dates and GPS coordinates showing when and where the photograph was taken.<sup>17</sup> "Tagging" and facial recognition features can identify individuals who appear in the photographs. The authors recently tracked an important but elusive witness through the GPS coordinates of a post via a third-party game app that a witness had "shared" that was less than two hours old. Facebook recently began stripping posted photographs of metadata. However, users often reveal their whereabouts by "checking in" to a location. Sometimes, posted photos are searchable through Google. It is possible the user or a friend has posted the same photo to a social media site that does not strip GPS and other data. Many people will update or post to their social media accounts well before an aggregator or other database can register a change in address, often making location information gleaned from social media the most accurate and reliable. Reading friend lists can lead to other witnesses and relationships important to the case. Social media is a rich, dynamic environment.

Scouring a subject's friend list is nearly always fruitful. If a particular subject has locked down his or her social media page to limit access, information may nevertheless be accessible through social media postings, including photographs, by a friend or family member who is less careful about guarding information. News feeds, photographs, birthdays, events, etc., will intersect multiple accounts. Think about the popular movie trivia game, *Six Degrees of Kevin Bacon*.<sup>18</sup>

Facebook is the most popular social media site with 1.94 billion active users, one in four people on the entire planet.<sup>19</sup> Although Facebook is the most popular social media site, it is far from the only one.<sup>20</sup> They all operate in similar ways, and it is important to learn the parameters of each to use them effectively. For example, the popular career networking



site LinkedIn notifies account holders who has viewed their profile pages, and that notice will be triggered if the researcher is logged into LinkedIn during the search. Therefore, log out of LinkedIn and use a Google Hack to search particular social media sites quickly and efficiently.<sup>21</sup> New social media apps appear on the market frequently, so visit the app store periodically and look for the most popular downloads to make sure the search includes all the relevant sites and services. Instagram and Snapchat are two such apps, and are popular with a younger demographic.

Blogs and message boards should be included in the social media search. Neighborhood crime watch blogs may provide written accounts of the crime directly from a witness or victim. Church blogs and message boards are excellent ways to discover relationships among witnesses and to learn about local culture. Clubs and social organizations often have Facebook pages or separate websites with members' names, event announcements, or photographs.

An additional word of caution: ethical rules preclude lawyers and their agents from misrepresenting themselves in the course of an investigation. In searching social media sites, the investigator should be cautioned not to friend or follow subjects or otherwise interact with them, and never to use a false or misleading identity to conduct the search. Anonymity is appropriate in this context; leave no footprints is an appropriate and desired objective. Misleading is not. Passive observation, not hacking, is what this exercise is all about.<sup>22</sup>

### Social Media Aggregators

It is important to know that Google does not crawl everything on the internet; no search engine does. Therefore, social media aggregator sites can be very helpful to investigators. The authors' favorite is Spokeo;<sup>23</sup> it is inexpensive, and collects a surprising amount of information. One will typically find a subject's address, including a photograph and fair market value of his or her house, along with occupation, place of employment, estimated income, and associated people. Searching one's own Spokeo entry is a real education about the need to lock down personal data.

Lexis and Westlaw also both offer social media aggregators, though these search tools are relatively new and have yet to catch up to Spokeo. Also of note are blog aggregators, such as Technorati and the Huffington Post.

### Public Media

Magazines and newspapers typically have an online presence, and their content often is not accessible by Google. It is therefore important to learn what media sources exist in the relevant jurisdictions — television stations, magazines, and newspapers are all important sources of information. A thorough search will include media coverage about the case, the client, and the subject of the investigation. Counsel should learn the local print and electronic media outlets, and search using the site's own search and archive tools. Many media outlets will permit a limited number of searches without a subscription; others require registration or a paid subscription. Purchasing such a subscription for a modest fee will be worth it for an ongoing investigation.

In addition to news stories about the event, a search may turn up stories or quotes by the subjects under investigation. Small town newspapers are especially helpful. Many have some version of a police blotter that includes arrests, court filings, divorces, obituaries, or admissions and releases from local jails and hospitals. These should be searched for witnesses, attorneys, law enforcement officers, and other subjects related to the case.

Don't forget to look in the "reader comments" section of relevant articles uncovered in the search. A savvy student once discovered that the client's trial attorney had been following articles about his former client, and had been making comments on message boards. Not only were these comments a violation of privilege, but they also revealed the attorney's own failure to investigate at the trial level, providing helpful evidence in support of an ineffective assistance of counsel claim.

### Schools and Libraries

Librarians are amazing. They specialize in finding and using sources of information and are trained to be helpful. Local libraries will have back issues of newspapers, school yearbooks, current and past directories, local government documents, genealogy records, and a wealth of other resources that are useful to investigators. Such information can produce photographs, relationships, and events relevant to the client's case. When the online search is exhausted, the next stop should be the local library of the target of the investigation.

As a final note, it is important to emphasize the circular nature of the

investigation. New information often requires backtracking to repeat previous searches based on new data. If a researcher comes upon address history placing a witness in a different jurisdiction, he or she must repeat that witness's court case search in that newly discovered jurisdiction. A thorough investigation leaves no stone unturned.

### Reporting Findings

A report that is little more than a digital document dump is useless to counsel. Organizing the investigation is important. A good investigator will report findings on a flash drive in two parts. First, counsel should ask for a memo summarizing the findings in narrative form. Second, the investigator should provide a directory containing links, downloads, and screen shots or PDF prints of the investigative work product.<sup>24</sup>

The written summary is important to assess the thoroughness of the investigation and the success of the exercise. Because a thorough internet investigation will typically find a large volume of documents, photographs and other information, a complete but concise summary enables the team to get a quick overview of each witness's digital footprint.

Preserving findings is important because the internet is a dynamic place. Websites close, documents are deleted, privacy settings change, photographs are updated, files are archived, and paywalls are erected. It is therefore important to download documents and photographs and capture screenshots or PDF printouts of materials that might be relevant. A screenshot of a subject's friend list on Facebook may contain valuable investigative leads or reveal relationships that are relevant to the case. The fruits of the investigation must be preserved in a manner that has evidentiary integrity for later use.

If the investigation is conducted in a team setting, findings of each team member's investigation should be discussed in a group setting in which each investigator summarizes the results of his or her investigation. Often the discussion will reveal the existence of relationships, events, or people whose significance is not apparent until one investigator's findings are compared with another's. Brainstorming findings in this setting often spawns new case theories and identifies avenues of future investigation.

### Conclusion

Every time the authors have conducted a thorough internet investigation,



they have found significant information that was previously unknown to the lawyers representing the client. In one Kansas case, student investigators found significant evidence that helped win a new trial for Kirk Wilson, who is now free.<sup>25</sup> Students working with the Midwest Innocence Project have also conducted a number of fruitful internet searches on pending cases, and it is likely that future judgments in favor of wrongly convicted prisoners will reflect evidence developed in part through these internet investigation exercises. It is a great resource for defense teams because virtually everyone has the basic computer skills necessary to do this exercise, and it is possible to do without leaving footprints or triggering alarms. The potential to convert substantial volunteer and student time and resources to usable work product is tremendous. The authors hope that sharing their experience will allow defense teams and clinical programs to benefit from, replicate, and improve methods to better serve clients.

## Notes

1. EXONERATIONS IN 2016, THE NATIONAL REGISTRY OF EXONERATIONS, March 7, 2017, *available at* [https://www.law.umich.edu/special/exoneration/Documents/Exonerations\\_in\\_2016.pdf](https://www.law.umich.edu/special/exoneration/Documents/Exonerations_in_2016.pdf) (last visited June 11, 2017).

2. 466 U.S. 668 (1984).

3. Cyber investigation is useful preparation, not a substitute, for field investigation.

4. The authors teach Internet Investigation in a UMKC Law School practical skills course using witnesses from ongoing Midwest Innocence Project cases. A class of 30 students can contribute several hundred hours of structured, organized internet research and investigation in just a few days. Geography is irrelevant to investigation over the internet; our students' investigations have produced useful results in cases in Arkansas, Kansas, Missouri, Nebraska, and Oklahoma, and each case involved witnesses who were spread across the country. Readers interested in including internet investigation training and exercises in a clinical setting can contact the authors for a course syllabus, materials, and teaching methods.

5. ABA Model Rules of Professional Conduct that govern counsel's duty to investigate include Rule 1.1 Competence ("Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation."); Rule 1.6 Confidentiality of Information ("A lawyer shall not reveal information relating to the representation of a client ..."); Rule 4.1 Truthfulness in statements to others ("In the course of rep-

resenting a client a lawyer shall not knowingly ... make a false statement of material fact or law to a third person ..."); Rule 4.4 Respect for the rights of third persons ("A lawyer who receives a document ... relating to the representation of the lawyer's client and knows or reasonably should know that the document or electronically stored information was inadvertently sent shall promptly notify the sender."); Rule 5.3 ("a lawyer having direct supervisory authority over the nonlawyer shall make reasonable efforts to ensure that the person's conduct is compatible with the professional obligations of the lawyer"); Rule 8.4 Misconduct ("It is professional misconduct for a lawyer to ... engage in conduct involving dishonesty, fraud, deceit, or misrepresentation ...").

6. See, e.g., *Robertelli v. New Jersey Office of Atty. Ethics*, 2016 N.J. Lexis 323 (2016), authorizing disciplinary action against an attorney who instructed his paralegal to friend an adverse represented party on social media and gather nonpublic information about him.

7. This caveat includes clerks, record keepers, law enforcement personnel, witnesses — generally, we want no human contact at this stage of the investigation. "No contact" includes filling out online forms or requesting further information from a clerk or website.

8. LinkedIn, for example, notifies account holders about who has viewed their profiles. Therefore, a backdoor search is preferred. To avoid triggering the notification, log out of LinkedIn and use the Google hack "[search term]: LinkedIn.com" to view public portions of a subject's profile without leaving footprints.

9. See, e.g., Illinois Private Investigator Jonathan Lyons' site, *Internet Sleuth*, <http://www.internetsleuth.net> and the National Institute for Computer-Assisted Reporting (NICAR) page, *The NICAR Net Tour*, <https://www.ire.org/nicar/nicar-net-tour>.

10. The authors recommend Accurint, Spokeo.com, and Lexis People Finder for safe, effective spam-free investigation. Although Ancestry.com is designed for genealogy researchers, it is a rich source of data for curious investigators.

11. The "Dark Web" is similar, but does have a sinister connotation. While a web-savvy researcher may be able to search the Dark Web for information in an ethical and legal manner without cause for concern, such a search requires advanced training and skills that the authors do not cover here.

12. Wyoming is the only state without online state records; the authors have spent a lot of time in the Wyoming State Archives in Cheyenne.

13. Missouri state court dockets and

cases can be searched on CaseNet at <https://www.courts.mo.gov/casenet/base/welcome.do>. Departments of the Jackson County, Missouri, government are linked through the county website, <http://www.jacksongov.org>, with internal searchable databases. The same is true of the city of Kansas City, <http://kcmo.gov>. The *Kansas City Star* is the primary news source in Kansas City. Current and archived issues of the *Star* can be searched on its website, <http://www.kansascity.com>. The area is also served by four television stations and multiple radio stations that have websites searchable for news content. It takes only a little research to identify local sources of news and other information.

14. It is likely that a thorough internet investigation will eventually turn up a subject's Social Security number. In reporting results, it is important to protect the privacy of such information from future re-disclosures.

15. *McCleskey v. Zant*, 499 U.S. 476 (1991); *Massiah v. United States*, 377 U.S. 201 (1964).

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