Supreme Court of New Jersey

DOCKET NO. 082209

STATE OF NEW JERSEY, Plaintiff - Respondent	:	CRIMINAL ACTION
	:	On Leave to Appeal from the Superior Court of New Jersey
v.	:	
	:	Sat Below:
ROBERT ANDREWS, Defendant - Petitioner	:	Hon. Joseph L. Yannotti, P.J.A.D. Hon. Garry S. Rothstadt, J.A.D. Hon. Arnold L. Natali, J.A.D.

BRIEF ON BEHALF OF AMICUS CURIAE COUNTY PROSECUTORS ASSOCIATION OF NEW JERSEY

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STATEMENT OF PROCEDURAL HISTORY AND FACTS

The County Prosecutors Association of New Jersey (CPANJ) relies on the Statement of Procedural History and Statement of Facts as set forth in the Appellate Division opinion in State of New Jersey v. Robert Andrews, 457 N.J. Super. 14 (App. Div. 2018) (hereinafter "Andrews") decided on November 15, 2008. (See Andrews, 457 N.J. Super. at 18-22). Amicus CPANJ notes the following additions.

The Essex County Prosecutor's Office Narcotics Task Force conducted an extensive investigation into drug distribution activity in Newark that resulted in numerous arrests of members of a criminal network, including the arrest of an individual named Quincey Lowery ("Lowery"), a target of the investigation. (Pa20-21).[1]

The Defendant, a sworn law enforcement officer, assisted Lowery in his drug dealing business, in part, by alerting Lowery to pending investigations, revealing law enforcement sources and methods, exposing the existence of a wiretap(s) and exposing undercover surveillance operations while they were occurring, such as identifying undercover police vehicles and the identities of surveilling undercover narcotics detectives. (Da56, Da65, Da66, Da73, Da75, Da93, Da 94, Da101, Da 102, Da107-Da109).[2]

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[1] Pa refers to Plaintiff's Appellate Division Apendix
[2] Da refers to Defendant's Supreme Court Appendix

The Defendant told Lowery to take defensive action in the face of these investigative efforts and to alert others members of his criminal network of law enforcement's investigative actions. As a result, Lowery alerted others and destroyed his phone. (Da 66, Da67, Da69, Da80, Da 81, Da108). Defendant was on duty when some of this activity occurred and used the phone(s) at issue in connection with this activity. (Da66, Da76, Da93, Da94).

The Defendant was having financial trouble at the time and expressed his desire to sell illegal drugs. (Da62). The Defendant also told Lowery he was a member of the Grapes Street Crips gang. (Da83, Da106).

The extent to which the Defendant revealed law enforcement investigative methods to Lowery, or other criminal elements, is unknown. The number of undercover officers endangered by the Defendant, and the degree of that danger, is also unknown. The precise number of undercover vehicles compromised is likewise unknown. Some of the answers to these questions are likely on the Defendant's phone.

Additionally, substantial efforts were made to access the Defendant's phone using the most advanced technology. The ECPO used sophisticated equipment and forensic services from the Jersey City Police Department, the New York City Police Department and the Federal Bureau of Investigation in an effort to decrypt the Defendant's phone. (Da114). Seeking the passcode from the

Defendant was the last resort to execute the lawfully issued search warrant.

LEGAL ARGUMENT

POINT I

THE UNITED STATES CONSTITUTION'S FIFTH AMENDMENT RIGHT AGAINST SELF-INCRIMINATION, AND THE NEW JERSEY COUNTERPART, IS NOT A DOCTRINE THAT ALLOWS A DEFENDANT TO DEFEAT A PROPERLY ISSUED SEARCH WARRANT UNDER THE FACTS OF THIS CASE AND THE LIMITED SCOPE OF THE COURT'S ORDER

Armed with a valid warrant, law enforcement may search "persons, houses, papers and effects." U.S. Const. amend. IV; N.J. Const. Article 1, para. 7. Amicus respectfully submits, the Fifth Amendment was not intended to defeat the Fourth Amendment, or confer cell phones with immunity from a lawful court-ordered search.[3]

As stated in Riley v. California, 573 U.S. 373, 401 (2014), the constitution should not be interpreted to make cell phones and computers immune from search. As the Riley Court emphasized "[c]ell phones have become important tools in facilitating coordination and communication among members of criminal enterprises, and can

[3] Amicus cannot conjure any residence, vehicle, document, safe, vault or other "tangible thing" that is immune from search when law enforcement has a valid search warrant. With the advancement of technology, conferring search immunity over computers and cell phones would have a catastrophic impact on law enforcement's ability to investigate criminal activity.

provide valuable incriminating [and exculpating] information about [alleged] dangerous criminals." Id.

In the past, when law enforcement encountered a roadblock to the proper execution of a search warrant, the United States Supreme Court, and this Court, have authorized methods far more invasive than use of a passcode to decrypt a phone. For example, destruction of property is authorized if necessary to effectuate warrant. United States v. Ramirez, 523 U.S. 65 (1998). Forced entry of a residence is permissible when necessary to properly execute a warrant. United States v. Banks, 540 U.S. 31 (2003). This Court has authorized the use of flash bang explosive devices, under appropriate circumstances and when necessary, to properly execute a search warrant. State v. Rockford, 213 N.J. 424 (2013).

In this case, the ECPO exhausted every investigative avenue to execute the search warrant in this case. They sought assistance from other state and federal agencies with state of the art technology to execute this warrant. Without the ability to obtain the passcode, the information on this phone - and other similar computer devices - are immune from search and law enforcement will be prevented from fully, fairly and accurately investigating criminal activity. This will prevent law enforcement from uncovering inculpatory, as well as exculpatory, evidence and

prevent disclosure of evidence that may be otherwise discoverable by codefendants.[4]

A. A NON-TESTIMONIAL "ACT OF PRODUCTION" DOES NOT VIOLATE THE FIFTH AMENDMENT OR NEW JERSEY COUNTERPART

Amicus submits the passcodes to the Defendant's phone are not testimonial and therefore the Fifth Amendment, and New Jersey's counterpart, is not a bar to compelling the production of the codes. Alternatively, Amicus respectfully argues that if the passcodes are considered testimonial, production should still be compelled under the foregone conclusion exception discussed below.

Amicus respectfully submits that the compelled production of a passcode is a non-testimonial "act of production" that does not violate the Fifth Amendment or the New Jersey counterpart. The passcode is merely a jumble of numbers, or letters, typically devoid of meaning. Moreover, under the terms of the trial court's order, the State would be precluded from seeing the code if it did

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[4] This Court has rightly required the State to provide broad discovery to criminal defendants. See generally State v. Dabas, 215 N.J. 114 (2013); State v. W.B., 205 N.J. 588 (2011); R. 3:13-3(b)(1). As mentioned, there are numerous codefendants, in addition to Lowery, that were arrested in connection with this investigation. It is beyond fair dispute that the Defendant texted, messaged and otherwise communicated about the investigation using his cell phone(s). It also cannot fairly be disputed that those phones contain discovery that may be relevant to the pending codefendants. In this regard, see State of New Mexico v. Ortiz, 146 N.M. 873 (2009)(holding discoverable information on the private cell phone of a police officer must be disclosed).

have any evidential significance. Further Amicus agrees the State should be precluded at trial from referencing the passcode or defendant's knowledge of the code. It could only be used as a tool to execute a lawfully obtained search warrant. Finally, it must be stressed that the issue here is only whether the Fifth Amendment protects the passcode itself, not the content of phones.[5]

1. FEDERAL PRECEDENT

The Fifth Amendment to the United States Constitution provides that "[n]o person ... shall be compelled in any criminal case to be a witness against himself[.]" U.S. Const. amend. V. "[T]he privilege protects a person only against being incriminated by his own compelled testimony." Doe v. United States, 487 U.S. 201, 207 (1988).

In other words, the Fifth Amendment provides protection only when the communication is: (1) incriminating; (2) compelled and (3) testimonial. See Doe, 487 U.S. at 207 (holding a compelled communication that had an incriminating effect did not violate the

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[5] The Fourth Amendment protects the contents of the phone, and the defendant's privacy therein. Fisher v. United States, 425 U.S. 391, 410 (1976)(citing United States v. Nobles, 422 U.S. 225, 233 n. 7 (1975)). ("The Fifth Amendment is not the general protector of privacy as that word is not mentioned in its text and privacy is a concept directly addressed in the Fourth Amendment.").

In addition, the contents of the phone were voluntarily prepared or compiled and are not testimonial. Consequently, they do not enjoy Fifth Amendment protection. See In re Boucher, 2009 WL 424718 (D. Vermont 2009)(citing United States v. Doe, 465 U.S. 605, 611-612(1984)).

Fifth Amendment because it was not testimonial). See also United States v. Hubbell, 530 U.S. 27, 34 (2000)(holding "[t]he word 'witness' in the constitutional text limits the relevant category of compelled incriminating communications to those that are 'testimonial' in character." "The difficult question of whether a compelled communication is testimonial … often depends on the facts and circumstance of [each] particular case." Doe v. United States, 487 U.S. at 214(citing Fisher v. United States, 425 U.S. 391, 410 (1976)).

"[T]o be testimonial, an accused's communication must itself, explicitly or implicitly, relate a factual assertion or disclose information." Doe v. United States, 487 U.S. at 209-10 (citing United States v. Doe, 465 U.S. 605, 613 & n.11 (1984); Fisher v. United States, 425 U.S. at 409-10 (1976)).

The question of Fifth Amendment protection concerning an order that requires a defendant to reveal a cellular passcode appears to best fall under the "Act of Production" line of cases. The Fifth Amendment privilege against self-incrimination applies not only to verbal and written communications but also when a defendant is compelled to produce something through "[t]he act of produc[tion]." Doe v. United States, 487 U.S. at 209; Fisher, 425 U.S. at 410.

The act of production may have communicative aspects, but that communication only has Fifth Amendment protection when it is

incriminating and testimonial. Fisher, 425 U.S. at 410. Consequently, the United States Supreme Court has long recognized that many compelled acts of production are not protected under the Fifth Amendment because they are non-testimonial.

For example: compelling blood samples is not testimonial and does violate Fifth Amendment, even where the results of the sample may be incriminating (Schmerber v. California, 384 U.S. 757 (1966)); compelling a handwriting exemplar is not testimonial and does violate Fifth Amendment even where the sample may lead to incriminating evidence (Gilbert v California, 388 U.S. 263 (1967)); compelling a voice exemplar is not testimonial and does not violate the Fifth Amendment even when incriminating evidence derives from the production of the sample (United States v. Dionisio, 410 U.S. 1 (1973)); compelling person to stand in a lineup is not testimonial and does violate Fifth Amendment even if when it leads to incriminating evidence (United States v. Wade, 388 U.S. 218 (1967)); compelling a Defendant to wear particular clothing is not testimonial and does violate Fifth Amendment even when the result is incriminating (Holt v. United States, 218 U.S. 245 (1910)); compelling a Defendant to sign a consent directive for the government to obtain financial records, the contents of which are assumed to have an incriminating effect, did not violate the Fifth Amendment. Doe, 487 U.S. at 210; compelling a Defendant or his accountant to turn over tax records, the contents of which

may have an incriminating effect, did not violate the Fifth Amendment. Fisher, 425 U.S. at 402.

2. New Jersey Counterpart to the Fifth Amendment

In New Jersey, the law governing the privilege against self-incrimination "[i]s founded on a common-law and statutory—rather than a constitutional—basis." State v. Reed, 133 N.J. 237, 250 (1993); State v. Hartley, 103 N.J. 252 (1986). However, it "[g]enerally parallels federal constitutional doctrine." State v. Chew, 150 N.J. 30, 59 (1997).

Although state protection in New Jersey often mirrors federal safeguards, there have been circumstances where this Court has provided more protection than federal law. For example, this Court has provided additional safeguards where the right to counsel is implicated. In New Jersey, suspects must be informed counsel is attempting to reach them during a custodial interrogation. State v. Reed, 133 N.J. at 251. Also, this Court has granted broader protection in situations where a defendant has invoked his or her rights. In New Jersey, Miranda warnings must be re-administered as a condition of continued interrogation after the invocation of the right to remain silent. State v. Hartley, 103 N.J. at 261. New Jersey courts also carefully scrutinize any improper comments on a defendant's silence during trial. See State v. Muhammad, 182 N.J. 551 (2005); State v. Brown, 190 N.J. 144 (2007).

In the context of the "Act of Production" line of cases, the area most relevant to this analysis, New Jersey has consistently provided the same protection as federal courts under the Fifth Amendment.

In State v. King, 544 N.J. 346 (1965), for example, this Court held as follows:

> Certain types of examination or inspection are outside of the scope of the privilege because non-testimonial in character. For example, fingerprinting, photographing, examination of the body of a person for identifying characteristics, drunkometer tests and blood tests, all may be compelled since to do so does not require the witness to disclose any knowledge he might have. See also State v. Alexander, 7 N.J. 585 (1951), cert. denied 343 U.S. 908, 72 S.Ct. 638, 96 L.Ed. 1326 (1952); Bartletta v. McFeeley, 107 N.J.Eq. 141 (Ch. 1930), affirmed 109 N.J.Eq. 241 (E. & A.1931).

More recently, in State v. Green, 209 N.J. Super. 347, 353-54 (App. Div. 1986), the Appellate Division noted that our Supreme Court has followed United States Supreme Court precedent in Fifth Amendment "Act of Production" cases. For example, in State v. Dyal, 97 N.J. 229, 238 (1984) this Court held that a drunken driver arrested by police with probable cause to believe he is intoxicated has no constitutional right to prevent involuntary taking of blood sample. See also State v. Adkins, 221 N.J. 300 (2016). In State v. Hall, 93 N.J. 552, 563-564, (1983), cert. den., 464 U.S. 1008 (1983), this Court held that compelling participation in a lineup, which involves only display of evidence which is otherwise publicly visible, is constitutionally permissible. In State v. Andretta,

61 N.J. 544, 551 (1972), this Court held that a defendant may be compelled to speak for a voiceprint test.

Our lower courts have also routinely followed federal "Act of Production" cases. For example, in State v. Burke, 172 N.J. Super. 555, 557-558 (App. Div. 1980), the Court held that compelling a defendant to give blood, hair and saliva samples does not violate rights against self-incrimination. In State v. Papitsas, 80 N.J. Super. 420, 426 (App. Div. 1963), the Appellate Division held that removal of an accused's shoes to obtain evidence to link him to crime does not violate the Fifth Amendment. In State v. Carr, 124 N.J. Super. 114, 118 (Law Div. 1973) the trial court found that taking of handwriting exemplars does not violate privilege against self-incrimination.

In short, on the issue presented in this case, Amicus respectfully submits that consistent with the above precedent, this Court should not extend greater protection in New Jersey than under federal precedent interpreting the Fifth Amendment. Amicus further submits that the compelled production of a passcode is not testimonial under the Fifth Amendment or the New Jersey counterpart. The passcode is merely a tangle of numbers, or letters, usually without meaning. Under the terms of the trial court's order in this case, the State would be precluded from seeing the code even if it did have some testimonial significance. Further Amicus agrees that the State should be precluded at trial

from referencing, in any manner or for any reason, the passcode or Defendant's knowledge of the code. Its use should be limited to the effective execution of a lawfully obtained search warrant. Under these circumstances, it is difficult to see how the passcode would be testimonial and trigger constitutional protection. The passcode simply does not explicitly or implicitly, relate a factual assertion or disclose information to the government. In short, the passcode only represents the necessary means to carry out a lawful search warrant.

B. PRECEDENT THAT COMPELLING A CELL PHONE OR COMPUTER PASSCODE AND/OR FINGERPRINT IS NON-TESTIMONIAL UNDER THE FIFTH AMENDMENT

In the context of computer or phone passcodes, federal courts and state courts have likewise found the act of production was not testimonial in the context of cellular passcodes. In the case at bar, the Andrews Court found as follows:

> Here, as in Doe, the act of disclosing the passcodes to defendant's phones does not convey any implicit factual assertion about the 'existence' or 'authenticity' of the data on the device. Moreover, in its order, the trial court required defendant to disclose the passcodes in camera before they are communicated to the State. The order thus ensures that any incriminating information would not be disclosed. The order also ensures that by providing the passcodes, defendant will not be compelled to 'restate, repeat, or affirm the truth of the contents of the' devices.
>
> [Andrews, 457 N.J. Super. 14, 23 (App. Div. 2018)(citing Fisher, 425 U.S. at 409.]

From this finding alone, Amicus submits the trial court's order does not violate the Fifth Amendment because it simply does not require the production of testimonial evidence.

Other Courts have likewise found that passcodes were non-testimonial. For example a United States District Court held that the Fifth Amendment did not bar law enforcement from compelling the residents of a home to decrypt smart devices (iPhones and iPads) found in the home by using their fingerprint(s). IMO Search Warrant Application, 279 F.Supp.3d 800, 805 (N.D. Ill., E.D 2017). The court compared that act to other cases where the court permitted compelled physical characteristics, blood, handwriting, and voice. Id. The court found that although compelling a resident to use his or her fingerprint may be incriminating - because it would connect them with the device found in the home - it was not testimonial. Id.

Similarly, in Florida v. Stahl, 206 So.3d 124 (2016), the Second District Court of Appeal held that where the government provided immunity over the passcode itself, Fifth Amendment protection was not triggered. "[C]ompelling a suspect to make a nonfactual statement that facilitates the production of evidence for which the State has already obtained a warrant based upon evidence independent of the accused's statements linking [him] to the crime does not offend the privilege. Id. at 134(citing Doe, 487 U.S. at 213 n.11).

In Stahl, the defendant was charged with video voyeurism for videotaping underneath women's clothing without their consent. The court found that by providing the passcode, "Stahl would not be acknowledging the phone contains evidence … would not betray and knowledge Stahl may have about the circumstances of the offense." Id. In short, the passcode did not 'relate a factual assertion or disclose information' and therefore the Fifth Amendment did not apply. Id.

The Stahl Court also found that the Fifth Amendment did not provide greater protection to individuals that protected their phones with letter and number combinations from those that use their fingerprint as the passcode. Id. at 135. The Stahl Court also commented on the oft quoted Stevens dissent in Doe, 487 U.S. at 219, "that an accused may be 'forced to surrender a key to a strongbox containing incriminating document,' but he cannot be compelled to reveal the combination to his wall safe." Id. at 234. The Stahl Court questioned any significant difference between surrendering the location of a key and a combination. Id. at 135. More importantly, the Court recognized such a distinction is obsolete "as technology advances." Id.

Amicus agrees with the reasoning of Stahl. Compelling Andrews to disclose the passcode does not convey any information of substance to law enforcement. Andrews is not acknowledging the phone is storing evidence or the nature of that evidence. He is

not betraying any information he has about the circumstances of the offenses at issue. He is simply revealing a meaningless clutter of numbers or letters. Like a strongbox, he is simply providing the key. Whether the phone is locked via fingerprint or number code is a distinction without a difference, especially in this technological age.

C. *THE FOREGONE CONCLUSION EXCEPTION*

It is acknowledged that Courts have held that in the context of passcodes "the Act of Production" could trigger Fifth Amendment protection where the production itself acknowledges that the object exists, that it was in the defendant's possession and is authentic. Hubbell, 530 U.S. at 35.

Even under these circumstances, however, production can nonetheless be compelled under the foregone conclusion doctrine. In Andrews, the Court held that even if the Defendant made an implicit statement of fact that he possessed an iPhone, accessed the phones or set the passcode, those facts a foregone conclusions and he can nonetheless be compelled. Andrews, 457 N.J. Super. at 24. This is so because "the State has established that [the defendant] exercised possession, custody and control over the devices. Therefore the fact that defendant knows the passcodes . . . adds little or nothing to the sum total of the Government's information." Id.

The foregone conclusion doctrine was first introduced by the United States Supreme Court in Fisher, 425 U.S. at 411. The Fisher Court found that when the act of producing the information "adds little or nothing to the sum total of the Government's information" it is a foregone conclusion and can be compelled even when it has "some minimal testimonial significance." Id. For example, when an accused is required to submit a handwriting exemplar, he is admitting "his ability to write and impliedly admits the writing is his exemplar." "But in common experience, the first would be a near truism and the latter self-evident." In the Fisher case, the Court examined the question of whether the act of producing the documents at issue might reveal the "existence, location and authenticity" of the documents, but held those considerations were either foregone conclusions or not implicated. Id. at 411-413.

For the foregone conclusion principle to apply, the Government must first be able to "describe with reasonable particularity" the documents or evidence it seeks to compel. U.S. v. Hubbell, 530 U.S. at 30.

Federal Courts and state courts have applied the foregone conclusion principle in the context of compelling passcodes to cellphones and computers. In United States v. Apple Macpro Computer, the Court upheld a lower Court's decision that the Defendant was required to produce passcodes to decrypt computer devices. United States v. Apple MacPro Computer, 851 F.3d 238, 249

(3d Cir. 2017). The Court agreed with lower Court's finding that any testimonial aspects from the production of passcodes were a foregone conclusion because the foundational requirements under the doctrine were met. Id. at 238. More specifically, the government demonstrated, with reasonable particularity, the existence, possession and authenticity of the devices. Id. In Apple MacPro Computer, the government demonstrated that: (1) the government had custody of the device (existence); (2) the defendant possessed the device prior to the seizure (possession) and (3) that there was relevant evidence on the device to the crime at issue (authenticity). Id. Because the government already knew these things, the act of producing the passcode could add nothing, or very little, to sum total of the governments information.

Similarly, in United States v. Fricosu, 841 F.Supp.2d 1232 (D. Col. 2012), the Court found that where the government provided immunity over the passcode itself, and could demonstrate by a preponderance of the evidence, the location of the device and that it was possessed and used by the Defendant, the Fifth Amendment did not bar disclosure. Id. 1238. The Fricosu Court relied on the "All Writs Act"[6] in support of its decision.

[6]The All Writs Act is a United States federal statute, codified at 28 U.S.C. § 1651, which authorizes the United States federal courts to "issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law." See N.J.S.A. 2A:10-1; R. 1:10-1 and R. 1:10-2 for New Jersey comparable state authority.

Other states have also applied the foregone conclusion principle in the context of compelling passcodes to cellphones and computers. In Commonwealth v. Davis, 176 A.3d 869 (Sup. Ct. Pa. 2017), the Court held that compelling a Defendant to provide a digital password was not testimonial, and did not trigger protections afforded by the Fifth Amendment, because the passcode did not communicate facts of "a testimonial nature to the Commonwealth beyond that which [was already known]." Id. at 875. The Court held that the foundational requirements for the foregone conclusion exception were met because the Commonwealth demonstrated that the computer and passcode existed, it was in the Defendant's possession and that the "technology was self-authenticating" (i.e., if the code unlocked the device, it was authentic). Id. at 876.

In Commonwealth v. Gelfgatt, the Massachusetts Supreme Court, stated the foregone conclusion doctrine was applicable when the "act of production" loses its testimonial character because the information to be disclosed is a "foregone conclusion." Commonwealth v. Gelfgatt, 468 Mass. 512, 522 (2014). In other words, the information from the accused adds "little or nothing to the sum total of the government's information." Id. (citing Fisher, 425 U.S. at 411).

In Gelfgatt, the Defendant was an attorney that stole roughly 13 million through an elaborate mortgage fraud scheme. The Defendant was able to hide his criminal activity through the use

of multiple encrypted computers. In Gelfgatt, the Massachusetts Supreme court held that the Commonwealth could compel Defendant to produce the passcodes because they had met the foundational requirements under the foregone conclusion doctrine; namely (1) the location and existence of the evidence, (2) defendant's possession or control of the evidence and (3) the authenticity of the evidence. Id. 522-523. The Commonwealth established that the Defendant possessed the computers, used them in connection with the criminal activity and had knowledge of the passwords.

In Stahl, the court alternatively held that the State also met the elements of the foregone conclusion exception. More specifically that the State established "with reasonable particularity that the passcode existed, was within the accused's possession … and was authentic."[7] Id. at 136.

The foregone conclusion exception is likewise applicable here. Defendant's possession and use of the phones, which would presume knowledge of the passcodes, is proven by Defendant's actual possession and request for return, phone billing records, the testimony of Lowery and the forensic analysis of Lowery's phone. The passcode itself adds "little or nothing to the sum total of the government's information."

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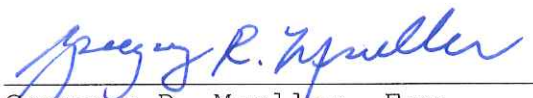
[7] As discussed above, this finding was not central to the Court's holding in Stahl because the Court had already concluded that the passcode was not testimonial and therefore not protected under the Fifth Amendment.

CONCLUSION

Amicus respectfully submits the Fifth Amendment is not a bar to the proper execution of a search warrant in this case and that additional protection under New Jersey law should not be provided under the particular facts of this case, and the limited scope of the trial Court's Order.

Respectfully submitted,

FRANCIS A. KOCH, SUSSEX COUNTY PROSECUTOR
PRESIDENT CPANJ

By: 

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Dated: July 19, 2019