

**APPENDIX 9a**

**Sample of Affidavit in Support of Search Warrant  
Following Scent Dog Sweep in School  
Warren County Prosecutor's Office  
Multijurisdictional Narcotics Task Force**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - WARREN COUNTY

CRIMINAL

STATE OF NEW JERSEY )

AFFIDAVIT

) ss.:

COUNTY OF WARREN )

TIMOTHY YOUNG, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I make this affidavit in the performance of my duties as a law enforcement officer of the State of New Jersey. I am a detective employed by the Warren County Prosecutor's Office MultiJurisdictional Narcotics Task Force. Previously I was assigned to the Trial Unit of the Prosecutor's Office. I have been employed by the Warren County Prosecutor's Office since June of 1992. I was previously employed by the office of the Public Defender's Office, Toms River, New Jersey, as an Investigator from August 1990 to March 1991. I graduated from Moravian College with a B.A. degree in 1986 and from the Ocean County Police Academy, in Lakewood, New Jersey in December 1991. During my employment with the Office of the Public Defender my duties included, but not limited to, office and

field work in preparing criminal cases for trial, report writing, serving subpoenas and testifying in criminal court.

Since my assignment to the Multi-Jurisdictional Narcotics Task Force I have worked both surface investigations as well as in an undercover capacity, including the development of informants, and gathering of intelligence information regarding the distribution of illegal drugs. I have assisted in the preparation of affidavits and search warrants and assisted in the execution of many search warrants during my career, which resulted in the successful prosecution of persons involved in the illegal trafficking of narcotic violations of the Controlled Dangerous Substance Act of the State of New Jersey.

I have attended the following seminars/schools to enhance my law enforcement training:

New Jersey Narcotic Enforcement Officers Association Seminar, Alcohol Beverage Control Enforcement, Modified Course for Investigators, Raids (High Risk Warrant Service); Street Level Narcotic Enforcement, Snitches: Confidential Informants In Drug Enforcement.

I have probable cause to believe and do believe that in the [REDACTED] County of Warren, State of New Jersey there exists evidence of the offenses of Possession of CDS, and Possession of CDS with Intent to Distribute in violation of N.J.S.A. 2c:35-10a et. seq. and N.J.S.A. 2c:35-5a(1) et seq.

2. The facts tending to establish the grounds for this

application and probable cause of my beliefs are as follows:

On March 26, 1996 the Warren County Prosecutor's Officer received information from officials at the [REDACTED] Board of Education of a possible "on going" drug use and distribution problem inside [REDACTED] involving the sale and possession of marijuana, cocaine and L.S.D.

a. On March 29, 1996 the Warren County Prosecutor's Office received an official request from the Superintendent of the [REDACTED] Board of Education to enter the school and to conduct an investigation into narcotics activity. This request included the use of specially trained narcotic detection dogs to assist in determining the existence of narcotics in school.

Arrangements were then made after authorization by appropriate school officials to have officers from the Warren County Prosecutor's Office, the [REDACTED] Police Department, the [REDACTED] Police Department and New Jersey Department of Corrections conduct an investigation of the Warren Hills Middle on March 29, 1996. This investigation would center around the student locker area, student parking area and several randomly picked classrooms. These areas were to be investigated by specially trained K-9 teams.

c. On March 29, 1996, the investigation was conducted by three K-9 teams.

Patrolman Collins and K-9 Billy

Patrolman Thomas Cicerelle and K-9 Nekko

Officer William Crampton and K-9 Yogi

(See attached qualifications of each K-9 team incorporated herein.)

K-9 Billy gave a positive indication on the below listed items:

Locker # [REDACTED] located in cafeteria area belonging to [REDACTED] [REDACTED] at 10:08 a.m.,

Locker # [REDACTED] located in cafeteria area vacant at 11:05 a.m.

Locker # [REDACTED] located in cafeteria area belonging to [REDACTED] [REDACTED] at 11:05 a.m.

K-9 Nekko gave a positive indication on the below listed items:

Locker # [REDACTED] located across from gym by room 306 blue belonging to [REDACTED] at 10:54 a.m.

Locker # [REDACTED] located between classrooms 206 and 208 belonging to [REDACTED] at 10:06 a.m.

Locker # [REDACTED] located across from gym by room 306 blue belonging to [REDACTED] at 11:10 a.m.

Based on the above, my training and experience in the field of narcotics, as well as the training and experience of the K-9 teams, I have probable cause to believe that the below listed items are being used for the storage of narcotics and associated narcotic paraphernalia including but not limited to narcotic ledgers, scales, bagging materials, ingestion devices and monies to carry on said illegal activities.

The lockers, vehicles and persons to be searched more specifically described above are described as follows:

<u>ITEM</u>	<u>OWNER</u>
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	Unassigned
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	[REDACTED]

WHEREFORE, the undersigned respectfully requests permission to search the aforementioned lockers in order to find evidence of the illegal practices of possession of controlled dangerous substance, possession with intent to distribute as described above.

WHEREFORE, the undersigned respectfully requested that (a) Search Warrant(s) be issued for:

<u>ITEMS AND DESCRIPTION</u>	<u>OWNER</u>
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	Unassigned
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	[REDACTED]
Locker # [REDACTED]	[REDACTED]

Locker # [REDACTED]

[REDACTED]

I am requesting that these search warrants be issued for the hours between 9AM and 5PM within ten days from the issuance thereof.

*Timothy Young*  
DET. TIMOTHY YOUNG

Sworn to and subscribed  
before me this 29<sup>th</sup> day  
of March, 1996

*[Signature]*  
Judge of the Superior Court  
State of New Jersey

PATROLMAN KENDALL COLLINS AND K-9 BILLY

Patrolman Kendall Collins has been a police officer with the [REDACTED] Police Department for the last seven (7) years. During which time he has been involved in over 200 narcotic investigations. He was assigned to the Warren County Prosecutor's Office Narcotics Task Force where he worked in an undercover capacity, including the development and gathering of intelligence information regarding the distribution of illegal drugs. He has been involved in over 200 investigations involving narcotics. He has attended the following schools: New Jersey State Police Academy, Driving While Intoxicated/Standardized Field Sobriety Testing, New Jersey State Police Breathalyzer, Crime Scene Investigations, Radar Operator Recertification Training, Morris County Canine Academy for Drug Detection and is a Certified Narcotic Canine Handler.

K-9 Billy graduated the Union County Sheriff's Department, K-9 Unit Basic Narcotic Detection Dog Course on July 16, 1993. He also has received training by the Roanoke County, V.A. Police Department Fall Seminar K-9 Tactics/Search and Seizure Course in October 1994 and V.P.W.D.A. Narcotics Dog Certification Obedience/Area Search/Building Search/Vehicle Search in October 1994. K-9 Billy is trained on a bi-weekly basis in the detection of narcotics. He has been involved in



70 narcotic investigations involving the search of articles, vehicle, and residents. It was during these investigations that K-9 Billy located narcotics and U.S. currency with the residual odor of narcotics. He receives in service training on a continual basis with certified instruction from the Union County Sheriff's Department to meet with the Attorney General's Guidelines.

PATROLMAN THOMAS CICERELLE AND K-9 NEKKO

Patrolman Thomas Cicerelle is a police officer with the [REDACTED] Police Department and has over seven (7) years of police experience. He has been involved in over 25 narcotics investigation. He has attended the following schools: New Jersey State Police Basic Training Academy, Evasive Driving Class, Emergency Response to Hazardous Materials, Drug Interdiction, Radar Operator Recertification, Drug Enforcement, Sexual Assault Investigation, Commercial Vehicle Inspection, Breathalyzer Operation, K-9 Decoy Seminar, Narcotic Training Seminar, Advanced Criminal Investigations, Basic Narcotic Detection Dog Course, Basic Patrol Dog Course, K-9 Tactics/Search and Seizure Seminar, Top Gun (Investigation and Prosecution of Drug Cases).

K-9 Nekko graduated the Union County Sheriff's Department K-9 Unit Basic Narcotic Detection Dog Course in July 1993. He also attended the following training: U.S.P.C.A. Narcotic Detection Dog Certification, Tuckerton Police Department Basic Patrol Dog Course, Roanoke County V.A. Police Department Fall Seminar on K-9 Tactics/Search and Seizure, U.P.W.D.A. Patrol Dog Certification and U.S.P.C.A. Patrol Dog I Certification. K-9 Nekko is trained on a bi-weekly basis in the detection of narcotics. He has been involved in 60 narcotic investigations

involving the search of articles, vehicles and residents. It was during these investigations that K-9 Nekko located narcotics and U.S. currency with the residual odor of narcotics. He receives in service training on a continual basis with certified instruction from Union County Sheriff's Department meet With the Attorney General's Guidelines.

OFFICER WILLIAM CRAMPTON AND K-9 YOGI

William G. Crampton is a Senior Correctional Officer with the New Jersey Department of Corrections. He has been a correctional officer since 1985. He is presently a K-9 handler for the Special Operations Group of the Department of Corrections and handles both a K-9 Patrol Dog and a K-9 Narcotics Dog. He graduated from the following schools: The Corrections Officer Academy, the Atlantic City Police Department K-9 Academy for a 640 Hour K-9 Patrol School. He was trained in on and off lead obedience, tracking, building searches, field searches, and all phases of criminal apprehension. He has also attended the Atlantic City Police Dept. K-9 Academy, the Union County Sheriff's Department K-9 Academy with K-9 Yogi for a 480 hour K-9 Narcotics Detection course.

K-9 Yogi has attended the Union County Sheriff's Department K-9 Academy for a 480 hour K-9 Narcotics Detection course. In this course, K-9 Yogi was introduced to and trained to detect the following narcotics: marijuana, cocaine, methamphetamine and heroin. He was trained to give an aggressive indication by scratching at the presence of the narcotic odor. Four days a week K-9 Yogi does random narcotic searches in one of the state correctional facilities, totaling approximately 320 searches.

K-9 Yogi has been nationally certified in the detection of narcotics by the US Police Canine Associations standards in 1994 and 1995. He receives in-service training on a continual basis with certified instructors from the New Jersey State Police, Philadelphia Police Department K-9 Unit and the Union County Sheriff's Department to meet the Attorney General's guidelines.