

STATE OF ILLINOIS)
) SS
COUNTY OF KANKAKEE)

**IN THE CIRCUIT COURT OF THE TWENTY-FIRST JUDICIAL CIRCUIT
KANKAKEE COUNTY, ILLINOIS**

**PETITION AND AFFIDAVIT FOR LEAVING TO PLACE, MAINTAIN, REMOVE
AND MONITOR A TRACKING DEVICE**

I, Special Agent Clayt Wolfe #9758, being first duly sworn on oath and under penalty of perjury, states as follows:

1. I am employed as, and have been employed as a police officer for over eight (8) years with the Kankakee Police Department.
 - a. Over the past five (5) years, my duties have involved the investigation of narcotics offenses.
 - b. I am presently assigned as a Special Agent with the Kankakee Area Metropolitan Enforcement Group (KAMEG), a multi-agency law enforcement unit authorized to investigate violations of Illinois drug laws.
 - c. Affiant has attended the Illinois Police Training Institute (480 hours) and is a Certified Police Officer in the State of Illinois. Affiant has attended the D.E.A. Basic Narcotics Investigation Course (80 Hours), Reid Interview and Interrogation, Advanced Undercover Techniques and Survival, GPS Tracking Device Training, Electronic Criminal Surveillance Training, and other training.
 - d. I have been involved in hundreds of narcotics investigations involving cocaine, crack cocaine, heroin, cannabis and other illegal narcotics.
 - e. In previous investigations, I have worked as an undercover officer, posing as both a purchaser and a supplier of contraband; I have conducted surveillance of drug transactions and drug-related meetings; and I have interviewed defendants and informants regarding narcotics, including methods of drug distribution, the price of contraband, witness protection and the seizure of narcotics assets.

I am currently involved in the investigation of violations of the Illinois Controlled Substances Act by XXXXXXXX (M/B D.O.B. 05/20/83) and other known and unknown individuals;

2. I am swearing this affidavit in support of the foregoing application for authorization, installation and utilization of an electronic transmitter into or onto a tan Toyota Camry having a vehicle identification number (VIN) 4T1BGXXXXXXXXX and Illinois license plate XXXXX, which is registered to XXXXXXXX at XXX S. Evergreen Ave. Kankakee, IL 60901.
3. In September of 2011, I and other members of KAMEG, began an investigation into the drug distribution of XXXXXXXX, due to having received information from a Confidential Source (C/S) that XXXXXXXX was distributing large amounts of crack cocaine.
4. On September 14th, 2011, the C/S introduced me, while working in an undercover role, to XXXXXXXX for the purpose of purchasing a half ounce of crack cocaine. During this introduction, I conducted a hand to hand drug transaction with XXXXX in which XXXXX provided me with a clear plastic bag containing approximately 14.3 grams of purported crack cocaine and I, in exchange, provided XXXXX with \$500.00 prerecorded United States Currency/Official Advanced Funds (USC/OAF). XXXXX invited me to return to him in the future to purchase larger amounts of crack cocaine. XXXXX was observed, by Agents conducting surveillance, arrive at the drug transaction driving the above described tan Toyota Camry. The crack cocaine purchased from XXXXX was later field tested, resulting in a positive test result for the presence of cocaine.
5. On September 15, 2011, I conducted an undercover drug purchase of crack cocaine from XXXXX. On this occasion, XXXX provided me with a clear plastic bag containing approximately 56.7 grams of purported crack cocaine and I, in exchange, provided XXXXX with \$1,650.00 prerecorded USC/OAF. XXXXX was observed, by Agents conducting surveillance, arrive at and depart from the drug transaction in the above described tan Toyota Camry. The crack cocaine purchased from XXXXX was later field tested, resulting in a positive test result for the presence of cocaine.

6. Illinois license plate XXXXXX is registered to XXXXXX at XXX S. Evergreen Ave. Kankakee, IL 60901, on a tan 1996 Toyota 4-door, having VIN 4T1BG12XXXXXX, according to Illinois Secretary of State records.
7. It should be noted that the C/S has previously provided law enforcement personnel with information on several occasions that have led to arrests and/or convictions.
8. XXXXXX has been identified by other sources of information as being involved with the distribution of illegal narcotics in the Kankakee County area.
9. In order to further this investigation, other KAMEG Agents and I intend to monitor the movements of XXXXXXXX vehicle. Close physical surveillance of XXXXXXXX vehicle, may result in a surveillance Agent being recognized as a Police Officer by XXXXXX or his associates and thereby jeopardize the success of the investigation.
10. I am requesting the order be in effect for the next 60 days so that I may track XXXXXXXX to his narcotics supplier and/or his customers. I anticipate that XXXXXXXX vehicle will be moved throughout Kankakee County and possibly secreted in a garage, storage facility, or in or on other private property, thereby making it impossible to follow by traditional surveillance methods. Thus, other investigative procedures appear unlikely to succeed if tried. A GPS tracking device will allow Police to conduct effective surveillance of XXXXXXXXXXXX and members of his drug distribution organization and to identify drug and drug proceeds, stash houses, and identify other co-conspirators.

PETITIONER

Subscribed and sworn to before me this 27th day of September, 2011.

JUDGE OF THE CIRCUIT COURT