

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Agency case report: IP240012653

On 2-09-2024 SW VCTF, K-9, and SWAT served a signed and valid search warrant at 3839 E. Washington St Indianapolis, In. This location is a tire/mechanic shop. The target of the investigation was William Boyd b/m dob [REDACTED]. As SWAT was in route to make entry on the building, William Boyd left the shop on foot and walked westbound to the Amoco Gas Station. Detective Carmack maintained a visual on William Boyd while SWAT made entry into the business. James Wilkerson b/m 10/11/1982 who Detective Junior knows to be the owner/manager of the shop was standing just inside the business working on a car. James Wilkerson has keys to the business and opens the doors almost daily. Upon entry SWAT took James Wilkerson into custody. Detective Carmack asked for assistance with William Boyd over the IMPD Radio. At this time William Boyd was inside of the Amoco Gas Station. Officer Hummerickhouse went into the Amoco and made contact with William Boyd. He was then taken outside and placed into handcuffs. Detective Carmack went inside the Amoco and talked to Sunny Singh who was working the counter. Mr. Singh handed Detective Carmack a plastic bag with items that William Boyd had purchased, also in that bag was a handgun. Mr. Singh stated William Boyd asked him to hold onto the bag when William Boyd saw that the Police were coming into the store. Detective Junior along with Officer Tidrow walked over to the store to speak with William Boyd. After being mirandized by Detective Junior, William Boyd admitted to having the gun and giving it to Mr. Singh. William Boyd further stated the is a 22 caliber Glock and that he had gotten it from his son. Detective Junior and Officer Tidrow then walked William Boyd back to the tire/mechanics shop to continue the search warrant.

During the initial investigation it was discovered that William Boyd was using different vehicles in the mechanics shop to hide narcotics in. The vehicles were in different phases of repair or restoration. Most of the vehicles did not have license plates on them and were definitely inoperable.

During the execution of the search warrant, a detailed search of the business was conducted, there were at least fifty empty, one pound heat sealed bags found in the shop. These bags smelled like fresh marijuana. The following items were photographed by Officer S. Tidrow and recovered by Officer J. Willey unless otherwise noted:

All firearms were transported back the VCTF/VRT officer by Officer S. Tidrow.

All property was transported back the VCTF/VRT officer by Detective E. Stevenson.

-HSE #1- In a drawer of the yellow toolbox in the northwest corner of the business the following items were found by Officer Willey and photographed by Detective Stevenson:

It should be noted that in the same toolbox documents with James Wilkerson's name on it were found.

-Two knotted plastic bags containing a white powdery substance weighing 19 grams and 10 grams of a white powdery substance Officer Willey immediately believed through his training and experience as a police officer to be suspected cocaine.

- A plastic spoon covered in suspected cocaine.

- A Ziploc bag with suspected cocaine residue.

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- A pill bottle without a prescription label containing the following pills:
- Thirty beige/brown capsules with G456 on the capsule. This is believed to be suspected Amphetamine 30mg a Schedule 2 Controlled Substance.
- Twenty-five orange round pills with E/401 on the pill. This is believed to be suspected Amphetamine 20mg a Schedule 2 Controlled Substance.
- Twenty-six blue round pills with E/111 on the pill. This is believed to be suspected Amphetamine 10mg a Schedule 2 Controlled Substance.
- Five white round pills with 10/325 on the pill. This is believed to be suspected Oxycodone 325mg/10mg a Schedule 3 Controlled Substance.
- HSE #2- A box of baking soda was found by Officer Willey and photographed by Detective Stevenson in the yellow toolbox in the northwest corner of the business. Officer Willey knows that this is a common cutting agent for people that deal in narcotics such as cocaine to make the narcotic weigh more and increase their profits.
- HSE #3- A large vacuum sealed bag with suspected marijuana residue was found by Detective Stevenson in the northwest corner of the business, in the same area as the yellow toolbox. Photographed by Detective Stevenson.
- HSE #4- Two functioning digital scales found and photographed by Detective Stevenson in the northwest corner of the business. The scales have suspected marijuana on the balances. Detective Stevenson knows through his training and experience as a police officer that people that deal in illegal narcotics such as marijuana will use scales like the ones found to weigh out the narcotic before packaging and sales.
- HSE #5- The following items containing a green leafy substance weighing a total of 262 grams were found by Detective Carmack in the trunk of the car in the northwest corner of business and photographed by Detective Stevenson. Detective Carmack knows through his training and experience as a police officer that the green leafy substance is suspected marijuana:
  - Three jars containing a suspected marijuana.
  - A plastic sandwich bag containing suspected marijuana.
  - A large Ziploc bag containing suspected marijuana.
  - A Dorito chip bag containing a knotted bag with suspected marijuana.
  - A designer marijuana bag of suspected marijuana.
- HSE #6- A vacuum sealed bag, several individual knotted plastic bags and several designer marijuana bags containing a green leafy substance weighing a total of 230 grams was found by Detective Carmack in the trunk of the car in the northwest corner of the business. The car was inoperable and appeared to have been in the shop for months. The marijuana found in the vehicle was fresh and had not been sitting in that vehicle for an extended amount of time.
- HSE #7- A bronze container containing a green leafy substance weighing approximately 7 grams was found by Detective Junior inside a backpack in William Boyd's Cadillac. Detective Junior knows through his training and experience as a police officer that the green leafy substance is suspected marijuana.
- HSE #8- A black knotted plastic bag containing a white rock like substance (rock cocaine) weighing approximately 5 grams was found by Interdiction Officer Patton in James Wilkerson's front hoodie pocket.
- ITEM #1- A black Samsung cellphone in a black case was found by Officer Willey on the street next to James Wilkerson.

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- ITEM #2- A blue smartphone in a black case was found by Officer Willey on the street next to James Wilkerson.
  - ITEM #3- James Wilkerson medication paperwork was found by Officer Willey in the right drawer of the yellow toolbox in the northwest corner of the business. It should be noted that this is the same toolbox the suspected cocaine was found in.
  - ITEM #4- A black Apple iPhone in a black case was found on William Boyd's person by Detective Junior.
  - Money #1- \$1,986 was found by Officer Patton in James Wilkerson's right front pants pocket. Detective Junior believes this money is proceeds of illegal narcotics dealings. The money was transported to the IMPD property room and held for forfeiture.
  - Money #2- \$1,142 was found by Detective Junior in William Boyd's left front pants pocket. Detective Junior believes this money is proceeds of illegal narcotics dealings. The money was transported to the IMPD property room and held for forfeiture.
  - GUN #1- A loaded black Glock 44 .22 caliber, serial number AFFW412. Loaded with four rounds in the magazine and one in the chamber. Found by Detective Carmack after talking to the clerk at the gas station. Recovered by ATF gun liaison Officer J. Willey and processed by ATF gun liaison Officer S. Tidrow.
  - GUN #2- A loaded black Glock 23 Gen 5 .40 caliber, serial number BTSM601. Loaded with 12 rounds in the magazine and 1 in the chamber. Found in a blue car on the northeast side of the business in plain view by IMPD SWAT. Collected by ATF gun liaison Officer J. Willey and processed by ATF gun liaison Officer S. Tidrow.
- William Boyd was arrested for dealing in cocaine while armed, and dealing in marijuana. James Wilkerson was arrested for SVF in possession of a handgun, dealing in cocaine, and dealing in marijuana.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

DATED: February 12, 2024

Detective K. Junior  
AFFIANT