

UNITED STATES DISTRICT COURT

for the Northern District of Florida, Tallahassee

In the Matter of the Search of An express mail parcel bearing Express Mail Number: EI 594531573 US

Case No. 4:12-MC-00055RH

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

An express mail parcel bearing EI 594531573 US

located in the Northern District of Florida, there is now concealed (identify the person or describe the property to be seized):

Controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- checked evidence of a crime; checked contraband, fruits of crime, or other items illegally possessed; checked property designed for use, intended for use, or used in committing a crime; unchecked a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section Possession w/ Intent to Distribute a controlled substance, 21 USC 841(a)(1)

Offense Description

The application is based on these facts:

See Affidavit of Christopher J. Martin

- checked Continued on the attached sheet. unchecked Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Christopher J. Martin, United States Postal Inspector Printed name and title

Sworn to before me and signed in my presence.

Date: 09/21/2012

Judge's signature

City and state: Tallahassee, Florida

Honorable Robert L. Hinkle, United States District Judge Printed name and title

File#092112U#D#F#4#1150

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AFFIDAVIT

I, Christopher J Martin, being first duly sworn on oath, depose and state the following:

1. I am a United States Postal Inspector with the United States Postal Inspection Service, assigned to Tallahassee Domicile of the Miami Division, and have been so assigned for a approximately 2 months. I have been employed as a Law Enforcement Officer for 9 years. As part of my duties, I investigate the use of the United States Mail to transport non-mailable matter, to include controlled substances such as cocaine, heroin, marijuana, and methadone in violation of Title 21, United States Code, §§ 841(a) and 846. I have participated in numerous investigations which have resulted in the arrest of individuals who have received and distributed controlled substances. I have also participated in the seizure of the illegal drugs and proceeds from the sale of illegal drugs. In the course of my investigative experience, I have personally participated in the interception of approximately 50 postal parcels containing drugs and/or currency shipments consistent with payment for controlled substances. This affidavit is made in support of an application for a search warrant to search a United States Postal Service Express Mail parcel as follows:

Sender: EJ
1964 W Tennessee St
Tallahassee, Florida 32304

Addressee: Toyia Bradshaw
20840 NW 23rd Ave
Miami, FL 33056

Express Mail Number: EI 594531573 US

Weight: 3.9 ozs

Size: 15" X 12" X 1"

This parcel will hereinafter be referred to as "suspect parcel."

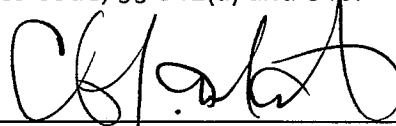
2. On September 20, 2012, at approximately 8:00PM, your Affiant located the suspect parcel, EI 594531573 US, which was received at the Tallahassee, Florida Post Office which is located at 2800 South Adams Street, Tallahassee, FL. The suspect parcel was addressed to Toyia Bradshaw, 20840 NW 23rd Ave., Miami FL 33056. The return address on the parcel was EJ, 1964 W Tennessee St., Tallahassee, FL 32304. The total cost of postage paid for this parcel was \$18.95.
3. Special Deputy U.S. Marshall Derek Terry assisted your Affiant by conducting a search of public record databases and was unable to associate the name, EJ, with the sender's address listed on the suspect parcel. Your Affiant knows from past investigations that individuals, who use the

U.S. Mail to ship controlled substances, and/or proceeds from the sale of controlled substances, will often use a fictitious name in an effort to avoid detection by law enforcement.

4. On September 20, 2012 at approximately 9:00pm, your Affiant met with Leon County Sheriff's Office Deputy Robert Wright, along with his controlled substance detection canine "Tag." Deputy Robert Wright is a trained canine handler with the Leon County Sheriff's Office with over 7 years canine handling experience. "Tag" is currently certified pursuant to guidelines established by the United States Police Canine Association (USPCA), for the detection of crack cocaine, cocaine, heroin, methamphetamines, and cannabis. Training and ultimate certification by USPCA involves required levels of successful detection by the canine during the search of vehicles and locations containing crack cocaine, cocaine, heroin, methamphetamine, and cannabis under controlled and timed controls with required levels of successful detection. Continued K9 certification requires annual re-testing. "Tag" has over eight years of experience in controlled substance detection and has been certified by the USPCA under standards as outlined above since April 2012.
5. At approximately 9:15pm on September 20, 2012, multiple other items of assorted shape and size not containing a controlled substance, and the suspect parcel addressed to Toyia Bradshaw, 20840 NW 23rd Ave., Miami FL 33056, were placed in the loading dock area of the United States Postal Plant located at 2800 S. Adams St. At approximately 9:20PM, Deputy Rob Wright observed and reported that "Tag" alerted to the parcel indicating the presence of a controlled substance in the suspect parcel addressed to Toyia Bradshaw, 20840 NW 23rd Ave., Miami FL 33056. "Tag" did not show any interest in the other items in the search area. The suspect parcel has remained in custody of postal authorities. Had the canine sniff been negative, the suspect parcel would have been continued in the mail stream for delivery with the time frame allotted for Express Mail parcels.
6. Your Affiant knows from past investigative experience, and through drug trafficking intelligence, that the United States Postal Express Mail service is frequently utilized by drug dealers for shipping illegal controlled substances, proceeds from controlled substance transactions, and is also used to send correspondence concerning drug transactions. The use of Express Mail is favored by drug dealers because of its reliability and speed, as well as the perceived reduced risk of detection of controlled substances when shipped in this manner. In addition, Express Mail allows the shipper, via the internet, to track the parcel and verify that it was delivered.
7. The sender paid \$18.95 to send the suspect parcel via Express Mail, which provides for shipment of the suspect parcel overnight. The suspect parcel was marked as "Extremely Urgent." The sender of this parcel did not list telephone numbers for either the sender or recipient. This is unusual for a parcel marked "Extremely Urgent." Based on your Affiant's experience, subjects involved in criminal activity often do not list any contact phone numbers related to a parcel. The purpose of not listing contact phone numbers is another attempt to avoid identification of the parties involved. Legitimate shippers, involved with parcels which merit the cost of expedited shipping, generally are not adverse to contact by postal authorities. As such, contact phone numbers are usually provided to ensure successful parcel delivery.

8. The sender listed EJ as the subject sending this package with an address of 1964 West Tennessee St., Tallahassee, FL 32304. Assisted by Special Deputy U.S. Marshal Derek Terry and Postal Inspector Russell J. Tabb, your affiant travelled to the address of the sender provided and determined the address to be associated with a retail facility with no residential housing.

Based upon the facts set forth in this affidavit, there is probable cause to believe that the aforementioned suspect parcel contains controlled substances, controlled substance paraphernalia, controlled substance proceeds, or correspondence concerning drug transactions. Therefore, your Affiant seeks the issuance of a search warrant, directing seizure and search of the suspect parcel and its contents for any evidence, fruits or instrumentalities thereof, related to a violation of Title 21, United States Code, §§ 841(a) and 846.



Christopher J Martin
United States Postal Inspector

Subscribed to and sworn to before me on this September 21, 2012, at Tallahassee, Florida.



HONORABLE ROBERT L. HINKLE
UNITED STATES DISTRICT JUDGE