



THE FACTS TO ESTABLISH THE GROUNDS FOR ISSUANCE OF A SEARCH WARRANT ARE:

Your affiant is a Salt Lake City police officer and has been a peace officer for over 3 1/2 years. Your affiant is currently assigned to the DEA/Metro Narcotics Task Force and investigates narcotic related offenses. Your affiant has had training in narcotic identification and in the investigation of narcotic related offenses. Affiant's specialized training includes the Utah Drug Academy, the Utah Clandestine Lab Course and the, and the Utah Narcotic Officers' Association annual training institute.

Your affiant has received information that the individuals who otherwise occupy 461 West 4800 South Unit #115 are engaging in an suspicious acitivity.

A Concerned Citizen told your affiant that he/she believes the person occupying the above unit are engaging in the storage of narcotics at the above storage unit. The Concerned Citizen stated that the persons who rent the storage unit, Lisa Bierly and Pete Bierly, come to the storage shed numerous times during the day, loading and unloading items from the Storage unit into back packs. The Bierlys have also asked the Concerned Citizen whether or not security cameras throughout the property covered Unit #115. The Concerned Citizen stated that he/she has observed furtive and secretive behavior, including the closing of the overhead doors of Unit #115 by the Bierlys when persons walk by.

Your Affiant knows through training and experience that persons engaging in the ongoing distribution of narcotics will often keep larger quantities of narcotics and/or money at a separate residence or storage shed to prevent detection. Affiant knows through training and experience that persons will often have "stash" locations where caches of narcotics and/or money are kept to prevent loss due to police activities and/or burglaries or robberies. Your affiant is also aware that it is uncommon for persons who lease storage sheds to visit them multiple times daily. Your affiant believes that this type of activity is consistent with narcotic related storage sheds he has investiatgated in the past.

Your affiant, with the assistance of DEA/Metro Task Force Detective Travis Rees and his PSD Pax, performed a Canine sniff of the above premise. Your affiant showed Detective Rees a row of consecutive storage sheds, one of which was #115. Detective Rees was unaware that the shed being investigated was #115. Detective Rees directed PSD Pax to perform a narcotics sniff on each of the storage units. Detective Rees then informed me that Pax indicated for narcotics only on storage unit #115.

Your affiant knows that both Pax and his handler Detective Travis Rees have current POST

certification for narcotics, which includes searches and sniffs on storage units. Your affiant knows that Pax has participated in excess of 100 narcotic finds. Both Detective Reese and Pax have over 500 hours of training on narcotic related searches.

Your affiant desires to enter 461 West 4800 South #115; and search for narcotics, narcotics paraphernalia and other items related to the distribution of narcotics. The paraphernalia includes such items as syringes, bent spoons, pipes or tubes used to inhale or smoke narcotics. Other related items include packaging material used to package narcotics and scales used to weigh quantities. Affiant knows from training and experience that these items are almost always found on the premises where search warrants for controlled substances have been executed.

Affiant desires to search for records of narcotic sales, residency papers and U.S. currency. Affiant knows from past experiences with narcotic investigations that persons sometimes record their sales to show dates, amounts purchased and drug indebtedness. Affiant knows from training and experience that narcotics is sold for money or stolen property.

This application for search warrant has been reviewed and approved for presentation to the court by Deputy District Attorney \_\_\_\_\_.

\_\_\_\_\_  
Detective Christopher A. Ward  
Affiant

**SUBSCRIBED AND SWORN TO BEFORE ME** this \_\_\_\_\_ day of

\_\_\_\_\_ 2000.

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Judge of the Third  
District Court