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9 Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
 12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,
 14 Plaintiff,
 15 v.
 16 JOHN DARRELL KROKOS, et al.,
 17 Defendants.

CR No. 12-00527-GW

DECLARATION OF SPECIAL AGENT JAMES
 KESSEL IN OPPOSITION TO DEFENDANT
 ZAID WAKIL'S MOTIONS TO SUPPRESS
 EVIDENCE

Hrg: March 27, 2014
 8:00 a.m.

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 20 The government, by and through its attorneys of record,
 21 Assistant United States Attorneys Timothy J. Searight and Benjamin R.
 22 Barron, hereby files a declaration of Special Agent James Kessel in
 23 opposition to two motions filed by defendant Zaid Wakil to suppress
 24 evidence. The first is a motion filed on June 30, 2013 and is

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1 entitled, "Notice of Motion and Motion by Defendant Zaid Wakil For
2 Order Suppressing Narcotics Seized From Federal Express Shipment."
3 The second is entitled, "Notice of Motion and Motion By Defendant
4 Zaid Wakil For Order Suppressing Narcotics Seized On July 18, 2011
5 From His Vehicle."

6 DATED: March 12, 2014

Respectfully submitted,

7 ANDRÉ BIROTTE JR.
8 United States Attorney

9 ROBERT E. DUGDALE
10 Assistant United States Attorney
11 Chief, Criminal Division

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TIMOTHY J. SEARIGHT
14 Assistant United States Attorney

15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA
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1 DECLARATION OF JAMES KESSEL

2 I, James Kessel, do hereby declare and state:

3 1. I am employed as a Special Agent ("SA") with Homeland
4 Security Investigations ("HSI") and have been so employed since
5 September 2009. I am currently assigned to the Ventura, California,
6 office.

7 Background of Investigation

8 2. In 2010 and 2011, I was assigned to a group of federal and
9 State officers examining the narcotics trafficking activities of John
10 Darrell Krokos ("Krokos"). In short summary, by May of 2011 the
11 investigation revealed that Krokos was a Canadian citizen primarily
12 residing in the resort town of Puerto Vallarta, Mexico. Krokos would
13 arrange with Mexico suppliers to transmit cocaine to Southern
14 California where representatives of Canadian buyers would exchange
15 cash for the cocaine, and the cocaine would be transported to Canada.

16 3. To investigate the group, a confidential source who had
17 previous contact with Krokos introduced an undercover officer to one
18 of Krokos' operatives in Los Angeles. This person was Ismael
19 Tomatani Tomatani-Guzman ("Tomatani"), who appeared to be associated
20 with Krokos' sources of supply in Mexico. The officer initially
21 posed as a buyer of drugs, but subsequently posed as a person who
22 could supply encrypted blackberry devices ("EBDs") to the group. I
23 have been informed that devices equipped with such technology cost
24 many hundreds of dollars more in Mexico than when purchased in the
25 United States. Eventually, Special Agent Rachel Burkdoll, in an
26 undercover capacity, began posing as the person who could supply
27 EBDs. After being contacted by Krokos, who was in Mexico, SA
28 Burkdoll met with Tomatani on multiple occasions in Southern

1 California to supply EBDs. The exchanges typically occurred in
2 parking lots in Southern California. Once the EBDs were introduced,
3 agents applied for and obtained orders for the wiretap interception
4 of the EBDs and other, non-encrypted devices with which the EBDs were
5 in communication. I believe that, since the EBDs had encryption
6 technology on them, Krokos felt relatively safe in communicating over
7 the devices. In fact, law enforcement had the encryption software
8 "keys" to the devices and was able to intercept communications over
9 them.

10 4. On March 25, 2011, by monitoring communications of Krokos
11 and others, agents and officers seized \$497,000 as it was moving
12 south from Los Angeles to the United States-Mexico border. On May 5,
13 2011, 19 kilograms of cocaine were seized from a "stash" location in
14 Downey, California. The person in control of the place where the
15 drugs were stored kept \$325,000 for himself, but told Krokos and
16 others that law enforcement had seized the cash.

17 5. In April, messages were intercepted between Krokos and
18 Tomatani indicating that Tomatani had another person in the Los
19 Angeles area that could provide drugs. This person was ultimately
20 determined to be Eduardo Olivares, who appeared to have his own
21 sources of supply in Mexico. Olivares was the person who ultimately
22 provided the cocaine to defendant Zaid Wakil that was seized from a
23 Federal Express shipment as described further below. On April 10,
24 2011, Krokos in Mexico contacted SA Burkdoll and asked for another
25 EBD. The next day, on April 11, 2011, SA Burkdoll, in an undercover
26 capacity, provided Tomatani with a new EBD for \$1,000 in the parking
27 lot of a Home Depot store in West Hills, California. Two days
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1 later, Tomatani began communicating with Olivares over the EBD. A
2 variety of relatively plain drug communications were intercepted over
3 Tomatani's EBD as he communicated with Olivares on the new EBD. For
4 example, on April 20, 2011, Olivares wrote to Tomatani, "Cousin says
5 he has more but only give 15 at a time." Tomatani responded, "Ok, we
6 will start with those 15. Then they will want more. That's if they
7 like it. I am leaving it the same 21.5." In this exchange, Olivares
8 was telling Tomatani that his suppliers could provide cocaine in 15
9 kilogram increments and at a price of \$21,500 per kilogram. That
10 same day, Krokos, using a monitored EBD, transmitted the cell phone
11 number for Olivares to an associate. I am aware that, on May 16,
12 2011, the Honorable Percy Anderson, United States District Judge,
13 signed an order for the wiretap interception of both the EBD and
14 cellular telephone being used by Olivares.

15 **Surveillance of Defendant And Detention of Boxes**

16 6. Almost immediately after the wiretap orders were signed, we
17 began to intercept defendant speaking with Olivares over the cell
18 phone. Defendant was a cocaine customer of Olivares' who appeared to
19 be separate from Krokos. On May 17, 2011, in an oral conversation,
20 defendant, while speaking from a telephone with an Atlanta, Georgia,
21 area code, told Olivares that he was preparing to get on a plane
22 later that day, and asked "Are we gonna be good for Wednesday?"
23 Olivares said, "Yeah, it should be good." Later in the conversation,
24 defendant said, "I may be able to do forty. I gotta count it when I
25 get there. I don't know. You know how it is." The next day, on May
26 18, 2011, shortly before 9:00 a.m., defendant called Olivares. After
27 greeting, Olivares said, "I'm heading that way like right now."

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1 Defendant said he would be waiting for Olivares. Olivares said,
2 "Yeah, when I get there right now, I'm gonna make you a key." From
3 the calls, it appeared plain that Olivares and defendant had a pre-
4 existing drug relationship with each other.

5 7. By this point in the investigation, a substantial amount of
6 information had been gathered about the movements of Olivares. There
7 were three locations where he often traveled. These were his
8 residence on Lochnivar Street in Pico Riviera, his mother's house at
9 6012 S. Budlong Street in Los Angeles, and a possible girlfriend's
10 house at 9760 White Oak Street in Chatsworth. I and agents in my
11 investigative group were also regularly receiving GPS information
12 pursuant to court orders for telephones being used by Olivares.

13 Olivares was known to drive a Pontiac GTO and a black Range Rover.
14 Shortly after 9:00 a.m. that day, Olivares was observed to leave his
15 mother's house on Budlong Street and travel in the direction of the
16 girlfriend's house in Chatsworth. At 11:35 a.m., surveillance agents
17 arrived at the Chatsworth house. They saw both the black Range Rover
18 and a tan Jeep Laredo vehicle parked there. At 11:46 a.m., defendant
19 walked out of the Chatsworth house and got into the Jeep. To my
20 knowledge, this was the first occasion on which law enforcement
21 officers in this investigation had seen defendant.

22 8. Defendant drove away from the Chatsworth house and began
23 engaging in extreme counter-surveillance driving as agents attempted
24 to follow him. Surveillance officers reported that at times he
25 accelerated to 90 miles per hour. On one occasion, he jumped two
26 raised concrete dividers in his Jeep and drove down a ramp for
27 vehicles entering the 110 freeway. I am uncertain if he did this
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1 because he detected surveillance or if he was attempting to determine
2 if surveillance was present. For a period of time, agents lost sight
3 of defendant. In the early afternoon, defendant's Jeep was found
4 again parked at the Chatsworth residence. Olivares' black Range
5 Rover was also parked there. Later in the afternoon, defendant was
6 followed to a business in Santa Clarita, "Tabig Logistics," at 26415
7 Summit Circle, Suite C, Santa Clarita, California. Later in the
8 afternoon, agents again lost sight of defendant, and he could not be
9 seen at the locations at which he had been previously seen. At 4:00
10 p.m. on May 18, 2011, surveillance was terminated.

11 9. With the license plate information from defendant's Jeep,
12 and the address and name of "Tabig Logistics," agents in my
13 investigative group were able to identify defendant as having used
14 the names "Zaid Wakil" and "Alvin Boatright." Defendant's identity
15 was confirmed through the use of a motor vehicles' photo. At some
16 point before defendant mailed the packages at the Federal Express
17 facility described below, defendant's criminal history was located.
18 The information showed that, on June 26, 1995, defendant was
19 convicted in a Pennsylvania state court of "possession of crack
20 cocaine with intent to deliver." More recent facts also came to our
21 attention. I and the agents in my investigative group became aware
22 that a vehicle stop was conducted of defendant in California in
23 November 2010 in which \$158,000 in cash was seized. In February
24 2011, that is, a few months before the facts in this declaration,
25 defendant was involved in an automobile collision in Ohio in which
26 \$1.2 million in cash was found in defendant's vehicle. A financial
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1 investigator also informed us that defendant was known to use Federal
2 Express facilities in furtherance of his activities.

3 10. Intercepts over Olivares' cellular telephone between
4 Olivares and a Spanish speaking supplier suggested that Olivares had
5 not been able to receive cocaine, or enough cocaine, on May 18, 2011.
6 On May 19, 2011 (the day on which the packages would be mailed out by
7 defendant), agents established surveillance at locations associated
8 with Olivares. At 11:16 a.m., Olivares received a call from his
9 supplier who said, "They have arrived." Olivares said, "Okay.
10 What's going to be?" The person responded, "Eighteen. A box of
11 eighteen." At 1:10 p.m., officers observed Olivares in the Range
12 Rover arrive at the Chatsworth house. At 1:26 p.m., defendant
13 arrived at the Chatsworth house in the Jeep. Although officers were
14 not in a position to see the Jeep well, at 1:48 p.m. one of the
15 surveillance officers observed substantial movement at the Jeep.
16 Although it is not certain, it is possible that at this point some or
17 all of the cocaine was transferred from Olivares to defendant's Jeep.
18 At approximately 1:57 p.m., defendant drove away from the Chatsworth
19 house in the Jeep.

20 11. Surveillance officers continued to follow defendant that
21 day. At approximately 2:35 p.m., defendant was seen to arrive at a
22 Federal Express store in Stevenson Ranch, California. A few minutes
23 later, he walked out of the store carrying two large, flat boxes. He
24 put the boxes in his Jeep and drove away. Unfortunately, at that
25 point, surveillance officers and agents lost sight of defendant.

26 12. I and agents in my investigative group worked to identify
27 the Federal Express locations in the San Fernando Valley area.

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1 Agents and officers drove-by multiple locations. At approximately
2 4:45 p.m., SA Burkdoll from my investigative group observed
3 defendant's Jeep parked at a Federal Express location at 24125 Magic
4 Mountain Parkway, Valencia, California. She went inside and observed
5 defendant mailing two large boxes (that would eventually be found to
6 contain the cocaine seized). Attached as Exhibit A are two still
7 photographs from Federal Express security video of defendant mailing
8 the packages and SA Burkdoll entering the store. While defendant was
9 inside, SA Burkdoll walked out of the Federal Express store and
10 walked by defendant's Jeep. In it she observed a food sealer which,
11 I am aware, is a device used by traffickers for the enclosing of
12 drugs to attempt to reduce the odor of the drugs. Once defendant
13 left the store, he was followed to the Tabig Logistics business. He
14 met with a female, and surveillance of defendant was discontinued.

15 13. I and SA Burkdoll returned to the Federal Express store on
16 Magic Mountain Parkway approximately one hour later and for the
17 purpose of attempting to detain the packages. We met with Federal
18 Express employees at the store whose names I did not record. We were
19 told, somewhat to our surprise, that the packages had already left
20 the store and would likely be at a Federal Express central service
21 center in North Hills, California. We travelled to this location
22 with other agents and officers. We identified ourselves as law
23 enforcement and asked to see the package mailed out at approximately
24 5:00 p.m. A Federal Express employee whose name was not recorded
25 provided myself and the other agents and officers with a large stack
26 of Federal Express shipping receipts. Knowing the names used by
27 defendant and the size of the boxes, approximately ten officers and
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1 agents began examining the shipping receipts. Eventually we located
2 a copy of the shipping receipt attached hereto as Exhibit B. As the
3 document indicates, the two boxes were being sent with a single
4 shipping receipt. The sender was identified as "Jonathan Wright,"
5 but with the same address for the Tabig Logistics business that
6 defendant had been seen visiting at 26415 Summit Circle, Suite C,
7 Santa Clarita, California. The recipient was "Zaid Wakil" at an
8 address in Monroeville, Pennsylvania. The shipping document said
9 that it was for two boxes weighing a total of 72 pounds.

10 14. We requested that Federal Express employees check the
11 location of the packages using the Federal Express tracking number
12 for the shipment. The packages were determined to be at a Federal
13 Express facility in Sun Valley, California, not far from the Bob
14 Hope/Burbank Airport. I and SA Burkdoll travelled to the facility
15 and arrived between 8:00 and 10:00 p.m. We had some difficulty
16 locating a Federal Express employee at the facility. When we did,
17 and we provided the employee with the tracking number, we were
18 informed that the packages had left the facility and would next
19 arrive at a Federal Express central facility in Indianapolis,
20 Indiana, on its way to Pennsylvania.

21 15. On May 20, 2011, I contacted Homeland Security
22 Investigations Special Agent (SA) Trent Elliott in Indianapolis and
23 informed him of the facts about the shipment. I then began working
24 with United States Customs Border Protection Inspector Robert
25 Satterley in Indianapolis to detain and examine the shipment. I
26 informed him of the facts pertaining to the shipment. I told him
27 that the boxes were expected to travel through a central Federal
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1 Express handling facility in Indianapolis, Indiana. Inspector
2 Satterley stated that he was familiar with the facility and that law
3 enforcement was sometimes called to the facility to conduct
4 inspections. Later in the day on May 20, 2011, Inspector Satterley
5 contacted me and informed me that, with the consent and assistance of
6 Federal Express employees, the Federal Express cargo airplane on
7 which the shipment was believed to be travelling was entered and,
8 after some time, the two boxes were located at approximately 3:00
9 a.m. Inspector Satterley stated that United States Customs Border
10 Protection Inspector Carl Weiler had conducted an examination of the
11 boxes with a canine, but the canine did not alert to the packages. I
12 informed Inspector Satterley that I believed that the boxes contained
13 narcotics based on information and facts gleaned over the prior two
14 days and requested that the boxes be detained while a warrant was
15 pursued. Photographs of the exterior with the Federal Express
16 mailing label affixed is attached hereto as Exhibit C.

17 **Indiana Search Warrant And Seizure of 52 Kilograms Of Cocaine**

18 16. I am aware that, on May 20, 2011, SA Burkdoll initially
19 began to prepare a federal search warrant for the boxes. By the time
20 boxes were detained and the facts concerning them were gathered, it
21 was Friday afternoon in Indianapolis, with a three-hour time
22 difference from Los Angeles. Efforts were made to locate federal
23 authorities in Indianapolis to whom a federal search warrant could be
24 presented, but no one could be located. We were told that many
25 persons were absent because it was the week of the Indianapolis 500
26 car race. I and SA Burkdoll wished to work quickly to obtain a
27 search warrant both because we were aware of the legal requirement
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1 that the shipment not be unduly delayed and because lengthy delay
2 would possibly alert the defendant to law enforcement interdiction of
3 the shipment. As the day progressed on May 20, 2011, the decision
4 was made to pursue an Indiana State search warrant. SA Elliot
5 informed me that he had contacts with the Indiana State Police
6 Department with whom he regularly worked. SA Elliot later informed
7 me that he contacted Senior Trooper Will Etter with the Indiana State
8 Police. The canine used by Trooper Etter was brought near the
9 packages. The canine alerted to the presence of narcotics. An
10 officer with the Indiana State Police, Jeffrey Segó, authored an
11 Indiana State search warrant for the boxes.

12 17. I was informed that the search warrant was approved at
13 approximately 11:00 p.m. (8:00 p.m. Pacific Standard Time) on May 20,
14 2011 by an Indiana judge. The search warrant is attached hereto as
15 Exhibit D. The two boxes were searched shortly thereafter. Each of
16 the boxes had a large Stanley Bostitch plastic tool box inside. A
17 photograph of the contents of the boxes is attached hereto as Exhibit
18 E. Each tool box contained approximately 24 plastic wrapped bundles
19 of cocaine. There were a total of 52 kilograms of cocaine seized.

20 May 29, 2011 Seizure of 11.8 Kilos of Cocaine from Defendant

21 18. Defendant was not immediately arrested after the seizure of
22 the 52 kilograms of cocaine while the investigation of defendant,
23 Olivares and others continued. Over the following weeks, further
24 evidence was gathered of Olivares' drug activity. This culminated in
25 further seizures of cocaine from defendant. Based on my role in the
26 investigation as co-case agent during the underlying investigation,
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1 including my communications with other investigators and my review of
2 reports and intercepted communications, I know the following:

3 19. On May 29, 2011, at 9:10 p.m., an Arizona police officer
4 observed defendant driving eastward through that state at 85 miles
5 per hour while driving in a Jeep Cherokee registered to himself
6 (different from the rented Jeep that he drove before). This traffic
7 stop was not requested by investigators in this case. The officers
8 impounded the car and conducted an inventory search of it, during
9 which the officers seized 11.8 kilograms of cocaine from toolboxes in
10 the trunk of the car. During the search of the car, the officers
11 found a Federal Express receipt for the packages that had been
12 seized. Defendant was arrested and released on bond.

13 20. The next night, agents intercepted a call between Olivares
14 and another unknown male ("UM"), during which Olivares stated that
15 the "black guy" (defendant) was arrested after being stopped for
16 speeding, and that O was going to help him pay the bond. The UM
17 asked, "What, why did they get him?" Olivares responded, "With what
18 I gave him." The UM asked, "Oh, with what you gave him." Olivares
19 said, "Yes, he was speeding, they stopped him." In a later call with
20 the UM, Olivares said that he had switched his telephone and provided
21 a new telephone (that would become Target Telephone No. 4 in the
22 series of wiretap orders in the investigation). In a June 1, 2011
23 call, Olivares told an unidentified female that they "snatched up one
24 of the fools that had been running with me," and that Olivares had to
25 "switch everything."

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1 **June 23, 2011 Seizure of 11 Kilos of Cocaine from Boroumand**

2 21. Agents learned from a May 31, 2011, intercepted
3 communication that Olivares was using what was later identified in
4 wiretap applications as Target Telephone No. 4. Agents obtained
5 federal wiretap authorization for that new phone. On June 21, 2011,
6 agents intercepted a call from Monsour Boroumand ("Boroumand") to
7 Olivares on Target Telephone No. 4, during which Boroumand said that
8 "they" would be in Los Angeles on Thursday and that Boroumand wanted
9 to give them "that, uh eleven." The next day, Boroumand called
10 Olivares and asked, "That's eleven [U/I], do you have it ready for
11 me?" Olivares said "yeah" and confirmed that Boroumand could "pick
12 it up." Boroumand said that he was "waiting for the guy . . . to
13 call to bring me the money."

14 22. A day later, on June 23, 2011, Olivares spoke with
15 Boroumand and said, "Come on right now," which Boroumand agreed to
16 do. Agents observed via a hidden surveillance camera that had been
17 set up at Olivares's residence (6012 Budlong residence in Los
18 Angeles) that Boroumand arrived and spent 40 minutes; agents knew
19 from prior observations over the pole camera that Olivares was there
20 at the same time. Agents watched Boroumand and Olivares meet behind
21 a gate at the Budlong location, following which Boroumand left the
22 residence with a box and drove away with it in his car. Agents
23 requested that a traffic stop be conducted on Boroumand's car, which
24 resulted in the seizure of 11 kilograms of cocaine from the box.

25 **July 18, 2011, Seizure of 18 Kilos of Cocaine from Defendant**

26 23. On July 12, 2011, agents intercepted a call between
27 defendant and Olivares, during which defendant stated "I'm leaving at
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1 1:30," to which Olivares responded, "Alright, I'll just, I'll just
2 wait for you to get back." Olivares said that "we're waiting" and
3 that "I'm trying to get it right." That same day, agents on
4 surveillance saw defendant at the 9760 White Oak, Chatsworth
5 residence (at which the May 19, 2011 drug transaction took place).

6 24. On the afternoon of July 15, Olivares spoke with both
7 Inocencio Aispuro-Lizarraga and Ubaldo Madrigal-Rosales in separate
8 calls (all quotes and paraphrasing are from statements in English or
9 translated Spanish). During a call with Aispuro, Olivares asked, "Do
10 you have any news?" to which Aispuro responded, "No, I have not
11 checked today. I am going to check to see what's up." Olivares told
12 Aispuro that he needs "eight," and Aispuro said he would call another
13 person "to see what he says." Olivares also spoke to Madrigal that
14 day and said "right now I need three-eight (38)" and Madrigal said,
15 "I can go and get that other, the others. Don't worry."

16 25. At 6:32 p.m., Olivares received a call from defendant.
17 Defendant asked Olivares to "let me get that, get that stuff off of
18 you." Olivares told defendant, "I'll grab them, but I just put them
19 away til you're ready." Defendant said that "I don't want to have...
20 nothing, I don't want to have [U/I] money and not have the stuff
21 other," and he later repeated, "I don't want to not have anything."
22 Defendant indicated that he was thinking of canceling the deal: "I
23 want to get my money. . . . 'Cause I didn't have the stuff, I wanted
24 to get my money. . . . Today is Friday, the day is gone. I can't do
25 nothing today but I got stuff to do on Monday. I can't even leave,
26 so if I got it what am I going to do? Sit around with it until
27 Monday. I can't do nothing." (Defendant said later in the

1 conversation that Olivares had been in possession of money from
2 defendant for three weeks: "You had the money since before the
3 beginning of this month, you've had it since I went to my last, the
4 last court hearing.") Defendant then asked, "How many you got for
5 me?" to which Olivares said, "I think like sixteen, something like
6 sixteen," which Olivares described as "bomb." Defendant said,
7 "Alright, bring me sixteen and then just bring me the rest of the
8 money. Can you do that?" Toward the end of the conversation,
9 Olivares said, "I'll see you later on, in a couple hours, give me a
10 couple of more hours," to which defendant responded, "Alright." In a
11 call later that night, Olivares told defendant "I'm gonna be coming
12 over in a little bit," and defendant said, "Okay."

13 26. On July 16, 2011, at 9:15 a.m., Olivares called defendant
14 and told him, "I'm about to get there right now." Defendant
15 responded, "I'm on my way." Based on this call, at 10:20 a.m.,
16 surveillance saw defendant arrive at the White Oak residence in the
17 white BMW registered in his name. At 10:46 a.m., Olivares called
18 Aispuro and said that he needed "eight," to which Aispuro responded
19 that he would "call around." That afternoon, Olivares told Madrigal,
20 "I need two zero," to which Madrigal responded "they have nine points
21 only over there." Aispuro later called Olivares later and said that
22 he (Aispuro) could get "nine." At around the same time, Olivares
23 spoke with Madrigal saying that the "guy" (defendant) had not picked
24 up "that shit" and, therefore, Olivares was not yet ready to pay
25 Madrigal.

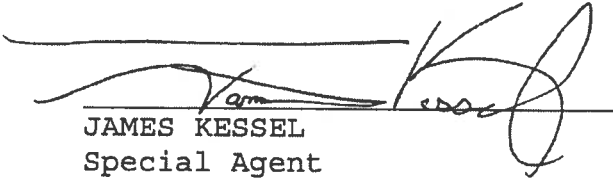
26 27. At 2:11 p.m. Olivares called defendant and said, "I got
27 somebody who is coming to meet me over there with the nine
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1 The other nine you want. And then I'm gonna get the remaining, and
2 then plus nine more." At 4:28 p.m., defendant called Olivares and
3 asked, "How long are you guys going to take, another couple hours?"
4 Olivares said, "About another hour . . . well I got two guys, the one
5 guy is going to come with the nine and then this one was supposed to
6 grab, I told him seven that's why." They agreed that defendant would
7 pick up "the other half" the next morning.

8 28. That day, agents observed defendant meeting with an
9 unidentified person who was driving a rented Ford Focus. That night,
10 believing that defendant would use the Focus to transport the cocaine
11 that defendant acquired from Olivares, an investigating DEA agent
12 placed a "slap on" tracking device on the car. Two days later, on
13 July 18, 2011, agents saw that the tracking device on the car showed
14 that it had left Los Angeles and was driving east through Arizona.
15 Agents submitted a request for an Arizona patrol officer to conduct a
16 traffic stop on the car.

17 I swear that the foregoing is true and correct under penalty of
18 perjury.

19
20 DATED: March 11, 2014

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23 JAMES KESSEL
24 Special Agent
25 Homeland Security Investigations
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CERTIFICATE OF SERVICE

I, Stella Gonzales, declare:

That I am a citizen of the United States and a resident of or employed in Los Angeles County, California; that my business address is the Office of United States Attorney, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of 18; and that I am not a party to the above-titled action;

That I am employed by the United States Attorney for the Central District of California, who is a member of the Bar of the United States District Court for the Central District of California, at whose direction the service by mail described in this Certificate was made; that on March 12, 2014, I deposited in the United States mail at the United States Courthouse in the above-titled action, in an envelope bearing the requisite postage, a copy of:

DECLARATION OF SPECIAL AGENT JAMES KESSEL IN OPPOSITION TO DEFENDANT ZAID WAKIL'S MOTIONS TO SUPPRESS EVIDENCE; EXHIBITS A - E

- Placed in a closed envelope for collection and inter-office delivery, addressed as follows:
- Placed in a sealed envelope for collection and mailing via United States mail, addressed as follows:
- By hand delivery, addressed as follows:
- By facsimile, as follows:
- By messenger, as follows:
- By Federal Express, as follows:

ZAID ABDUL WAKIL
REG # 83150-308
MDC Los Angeles
535 N Alameda Street
Los Angeles, CA 90012

at his last known address, at which place there is a delivery service by United States mail.

This Certificate is executed on March 12, 2014, at Los Angeles, California.

I certify under penalty of perjury that the foregoing is true and correct.


Stella Gonzales