

STATE OF INDIANA) IN THE ST. JOSEPH SUPERIOR COURT
) SS:) CAUSE NO. 71____-____-MC-_____
COUNTY OF ST. JOSEPH)

STATE OF INDIANA)

V.)

**Jagmeet Singh
222 E Victoria St
South Bend, IN 46614**

PROBABLE CAUSE AFFIDAVIT

Affiant swears or affirms that he believes and has good cause to believe that:

Affiant, Joseph Formato, a Police Officer with the Indiana State Excise Police Department, was involved in the investigation of Money Laundering, Legend Drug Deception, Counterfeiting and Corrupt Business Influence which occurred in South Bend, St. Joseph County, Indiana.

On October 2, 2023 a complaint was filed against the SYS Beverage Inc d/b/a Kwik Mart I located at 2603 S Michigan St, South Bend, St. Joseph County, Indiana. The complaint stated that an individual had observed a clerk provide a patron with a handful of blue pills and an energy shot. The complaint stated that the patron was charged \$30 for all items. Based on the description of the pills and having previously assisted with similar investigations, I believed the pills in question to be Viagra.

From October 2023 to November 2023, the premises was observed by officers, with no activity consistent with drug transactions observed during these times.

On January 5, 2024 officers began to conduct controlled buys of suspected illegal drugs being sold at the premises. Controlled buys were conducted on the following dates:

- January 5, 2024
- February 2, 2024
- March 1st, 2024
- March 8th, 2024

The buys conducted resulted in the purchase of blue pills with the words "Pfizer" on one side and "VGR 100" on the other. During the buys, US currency used to purchase the pills was confirmed to be stored in the cash register of the premise for the buys on February 2nd, March 1st and March 8th. The blue pills are consistent with "Viagra", which contains sildenafil, which can only be obtained by prescription.

During the buys conducted on January 5th, February 2nd, and March 1st, the clerk working at the time who sold the pills to me was later identified as Jagmeet Singh (DOB 05/18/2002).

On March 11th, 2024, a search warrant was granted for the d/b/a Kwik Mart by St. Joseph Superior Court Judge David Francisco.

On March 15, 2024, a final controlled buy was conducted prior to the execution of the granted search warrant. Jagmeet Singh was the clerk working on this day and the individual who sold me the blue pills. US currency used for this buy was documented by recording the serial number. The US currency used for this buy was placed in the cash register of the premises. The blue pill purchased on this occasion had the words “Pfizer” on one side and “VGR 100” on the other.

On March 15, 2024, at approximately 6:40PM Indiana State Excise Police Lt. Nick Canal, Sgt. Jessica Hyndman, along with Officers Joe Formato, Brant Mendenhall, Javier Arroyo, Markus Oster, Ben Fenstermaker, Tiffany Leer, Jeremy Bovee and Kaycee Sullivan executed a search warrant at the business of Discount Liquor II d/b/a Kwik Mart, located at 2603 S Michigan St., South Bend, St. Joseph County, Indiana. Officer Sullivan reports the following:

On the above-mentioned date, location and approximate time Officers Mendenall, Bovee, and I entered the business. We made contact with the male clerk after identifying ourselves verbally and by display of badges. We secured the clerk in handcuffs as the remaining officers entered the business to secure it. Clerk Jagmeet Singh was informed that we were there to execute a search warrant at the business.

Officers Mendenhall, Oster, Bovee, and I processed the business. Digital photos were taken prior to the seizing of any evidence. Officers Mendenhall and Oster seized all electronic devices, and they will be processed through the Digital Forensics Unit (DFU).

All Items seized were packaged and documented on an ESP 23 Property Receipt:

Items 1-5: UC buys prior to search warrant execution
Item 6: Total USC seized from Cash Register #1: \$1120.54
Item 7: Total USC seized from Cash Register #2: \$250.54
Item 8: One twenty-dollar bill from Cash Register #1 that was used to purchase the blue pill prior to the service of the search warrant
Item 9: One white plastic bottle containing 47 blue pills
Item 10: A plastic bag containing 438 blue pills
Item 11: 11 point of sale receipts

All evidence was transported to the District 1 Office in Bristol, IN. All evidence was packaged and submitted as evidence on March 16, 2024.

The following items were seized by Indiana State Excise Police Digital Forensics Investigator Mendenhall:

- 1 Apple iPhone 12 serial #H4YK3XAM0DXP
- POS System – item not taken – receipts printed

- 1 Dell Laptop service tag#GYDJJ72
- 1 HP laptop S/N#5CD3271XG0
- 1 DVS DVR S/N#G29774558
- 1 DVS DVR S/N#F06644361
- 1 DVS DVR S/N#D26609293
- CipherLab POS IMEI#35759080932561
- Bluebird Pidion POS

The US Currency \$20 bill (PB34513924C) I provided to Singh for the purchase of the blue pill was located in the cash register of the premises.

Interviews were conducted during the search warrant. Interviews were audio and video recorded. The following are summaries of those interviews, please refer to the recordings for a more detailed account.

Interview: Jagmeet Singh
Jagmeet Singh (DOB 05/18/2002)

Jagmeet Singh was advised of his Miranda Rights via departmental form. Jagmeet Singh stated that he understood his rights and stated he would answer questions.

Jagmeet Singh stated he has worked at the premises for 4 months. Jagmeet Singh stated that he is paid \$5000 a month working at the d/b/a Kwik Mart. Jagmeet Singh stated that he normally works 10am to 6pm, off on Sundays. Jagmeet Singh stated that his manager goes by "Bundy" and that he does not know his real name.

I showed Jagmeet Singh a picture of Kuljit Singh. Jagmeet Singh identified Kuljit Singh as the owner of the d/b/a Kwik Mart.

Jagmeet Singh would go on to say that he did not know the sale of the Viagra pills was illegal. Jagmeet Singh stated that he had sold the pills for 1 or 2 months. Jagmeet Singh stated that the pills were sold for \$10 dollars each. Jagmeet Singh stated that the money from the purchase of the pills is placed into the register at the d/b/a Kwik Mart. The pills are documented as non-taxable items (grocery). Jagmeet Singh stated that he was directed by his manager ("Bundy") to sell the pills.

During the interview Jagmeet Singh requested to speak with an attorney. The questioning was stopped.

This is a summary of the interview, please refer to the recording for a complete record.

Interview: Ravinder Singh DOB 06/16/1992

Ravinder Singh was advised of his Miranda Rights via departmental form. Ravinder Singh stated that he understood his rights and stated he would answer questions.

Ravinder Singh stated that he was a manager at the d/b/a Kwik Mart. Ravinder Singh stated that he had worked at the d/b/a Kwik Mart since 2010. Ravinder Singh stated that he is salaried and is paid \$1000 a month for each location that he manages. Ravinder Singh stated that he does not have set hours that he works. Ravinder Singh stated that he goes by the nickname "Bundy", which he more specifically stated is "Bunty". Ravinder Singh identified the owner of the d/b/a Kwik Mart as Kuljit Singh. Ravinder Singh stated that he was aware of Viagra pills being sold at the d/b/a Kwik Mart, further stating that they have been sold for the past 3 months. Ravinder Singh stated that he believed that Kuljit Singh was aware that the pills were being sold at the d/b/a Kwik Mart. Ravinder Singh stated that the pills were purchased from one individual with only the name "Sam" (later provided outside of the recorded interview). Ravinder Singh stated that "Sam" would sell the pills out of a u-haul style truck. Ravinder Singh stated that other locations were selling the pills too. Ravinder Singh stated that he buys the pills for \$3 each, with the pills being sold 1 for \$10 or 2 for \$15. Ravinder Singh was aware that the pills were illegal to sell. Ravinder Singh estimated that 250 pills are in each pack that he purchased.

This is a summary of the interview, please refer to the recording for a complete record.

I advised Jagmeet Singh and Ravinder Singh that any criminal charges would be referred to the St. Joseph County Prosecutor's Office.

Once the interviews were complete, all officers exited the premises with all items seized pursuant to the search warrant.

In regard to this investigation, I had previously been in contact with Agent Daniel Poirier of the FDA (Food and Drug Administration) regarding the pills being purchased at the d/b/a Kwik Mart starting in February of 2024. On March 19, 2024, I received information from Agent Poirier stating that the purchased pills were determined to be counterfeit by photographic examination. The examination was conducted by Viatris, a division of Pfizer. The pills were determined to be counterfeit by Neville Broad, PhD, director of Forensic Counterfeits for Viatris. A supplemental report of findings was provided to me.

On May 3rd, 2024, I began a review of the surveillance system at the SYS Beverage Inc d/b/a Kwik Mart I. Screenshots were taken on Jagmeet Singh selling the blue pills during some of the controlled buys.

Between June 27, 2024 and July 21, 2024, analysis was conducted on a sample of the blue pills seized during the investigation. The sample was found to contain Sildenafil.

On July 22, 2024, I began a review of the data contained within the cell phone possessed by Jagmeet Singh. During this review it was learned that Jagmeet Singh was not "Jagmeed" as previously documented. No additional information for the investigation has been discovered at this time.

I swear under the penalty for perjury as specified by I.C. 35-44.1-2-1, that the foregoing is true to the best of my information and belief.

/s/ Joseph Formato
AFFIANT: SGT. JOSEPH FORMATO

DETENTION CONSIDERATIONS

I: The defendant appears to be **eligible** for Criminal Rule 2.6 consideration.

II: The State has no further information concerning the Defendant's substantial risk of flight or danger to self or others.

III: The Defendant does **NOT** appear to be **eligible** for Criminal Rule 2.6 consideration and the State respectfully requests that the Court **detain the Defendant until a bail hearing** in open court, for the following reasons:

The Defendant is charged with Murder.

The Defendant is charged with Child Molesting or Child Solicitation.

Defendant is currently on pre-trial release.

Defendant is currently on parole or probation.

The Defendant is a substantial danger to self, others or the community.

The Defendant is a substantial flight risk.

The reason the State believes the Defendant is not eligible for Criminal Rule 2.6 consideration is as follows: **(Fill in details)**.

Should the Court determine that pretrial release is appropriate, the State requests that the following condition(s) be included in the terms of the Court's bond/ROR before the defendant is released from custody:

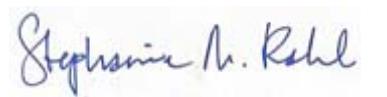
The defendant be ordered to have NO CONTACT with *[name of victim]*.

Community Corrections **shall** affix a GPS monitoring device upon the defendant, who shall be responsible for costs of the device. This GPS monitoring device shall remain until further Order of the Court.

That the Defendant post a bond no less than \$ *[amount]*.

The State has reason to believe that the defendant may be an appropriate candidate for consideration for the Behavioral Services Court (BSC). State requests a BSC Referral at the Court's discretion.

I affirm under the penalty for perjury that the foregoing representations are true.



Stephanie M. Rahl
Deputy Prosecuting Attorney