

# **EXHIBIT 15**

**AFFIDAVIT  
FOR PROBABLE CAUSE**

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STATE OF INDIANA, COUNTY OF MARION, SS:

JAMAL ABDULLAH SWEARS OR AFFIRMS THAT HE BELIEVES OR HAS GOOD CAUSE TO BELIEVE THAT; On Monday 7-12-98, at approximately 2322 hours, I was on the academy apartment's walkway, 1350 North Meridian Street speaking with the security officer, David L. Irwin, and security officer, Derald K. Cooper, when I observed African male, later identified by his Indiana State ID Card as Joseph M. Webster, date of birth [REDACTED], SSN [REDACTED] walk out from inside the apartment building. When Mr. Webster walked approximately 10 feet from us, I observed Mr. Webster reach inside his jacket and I observed a handgun fall from his person. I observed Mr. Webster bend over to pick up the weapon.

At that time, I drew my weapon from my holster and ordered Mr. Webster to back away from the weapon he dropped. Mr. Webster being argumentative and uncooperative. Mr. Webster was shouting I was making a mistake. He repeatedly shouted he had a gun permit. I observed Mr. Webster take off the black jacket with two white stripes on each sleeve and lay it behind him in the grass. I observed Mr. Webster take off his black shoulder holster and lay it beside the jacket in the grass. I placed handcuffs on Mr. Webster for my safety and security officer Irwin and security officer Coopers safety.

Through my investigation Mr. Webster was unable to produce an Indiana gun permit. Mr. Webster stated he purchased the



Don's Guns. I arrested Joseph M. Webster for carrying a handgun without a license. I read Mr. Webster Miranda warning. He stated repeatedly he understood his rights.

During a search incident to arrest, I recovered a black arch Motorola pager and a light blue pager on Mr. Webster's gym shorts. I recovered inside his right sock \$65. The Jennings firearm 380 automatic pistol, serial number 885202, I recovered it off the walkway where Mr. Webster dropped it. I recovered in the grass a black shoulder holster and a sonic enterprise LTD XXL jacket where Mr. Webster placed it.

I had A349, officer Robert Stradling, do a search incident to arrest on the jacket Mr. Webster had on, before I released it to his uncle on the scene. During Officer Stradling's search, he recovered a black audiovox handheld phone, serial number 17400779581, in the right front pocket. He recovered a clear plastic sandwich bag with a white hard substance inside the right chest pocket. During my investigation, I counted 24 small individually wrapped hard white substance and one white powdery substance, wrapped in clear plastic. Due to my training and experience as a law enforcement officer, I suspected to be cocaine. Add the additional charges of Dealing Cocaine with a firearm, Possession of Cocaine.

All evidence was transported to the property room by Officer Abdullah, narcotics placed in a heat sealed envelope and placed inside the narcotics drop box.





The suspected substance tested positive as cocaine in the amount of 4.49 grams by chemist Linda McCready.

ALL OF THE ABOVE EVENTS OCCURRED IN MARION COUNTY.

*Jamal Abdullah*

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JUDGE, FOR MARION MUNICIPAL  
OF MARION COUNTY

*[Signature]*  
\_\_\_\_\_  
DEPUTY PROSECUTING ATTORNEY  
Nineteenth Judicial Circuit

