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- 3) The defendant poses a real and present threat to the safety of any person or persons or the community; and
- 4) No conditions can mitigate the threat or risk of flight based on the following specific articulable facts:

Narrative:

- On April 24, 2026, members of the Illinois State Police Narcotics and Currency Interdiction Task Force (NARCINT) investigated a commercial motor vehicle at the Pilot Travel Center located at 3801 N. Division Street, Morris, Grundy County, Illinois. Special Agents and Inspectors with the Illinois State Police NARCINT observed and approached a white 2021 Freightliner tractor bearing California registration ZP62751 with a white 2017 Wanc trailer bearing Maine registration 5442332 at approximately 2:30 p.m.
- The tractor was registered to Khoo Wale Trans Inc., 1906 Faith Home Road, Ceres, California 95307, and the trailer was registered to Babbar Transportation, 1937 Prairie Lane, Stockton, California 95209; the tractor displayed "Khoo Wale Trans Inc, KWT, DOT# 3813097" on both sides. The tractor displayed KWT markings and DOT number 3813097.
- Initial contact was made with the occupants identified as Lovejeet Singh (driver) and Prabhjot Singh (passenger) at the fuel pumps (later relocated to a parking space for safety).
- Upon review of the bill of lading, the listed trailer seal number did not match the physical seal affixed to the trailer doors. The bill of lading listed seal number 72412909, while the trailer bore a red JJ Keller seal number 06661265.
- When asked if there was anything illegal in the truck or trailer, Lovejeet Singh replied, "I don't think so," and then provided consent to search the tractor and trailer at 2:43 p.m. on April 24, 2026.
- During the search of the tractor, agents located an open package of red JJ Keller seals matching the seal on the trailer door.
- Lovejeet Singh provided a key that unlocked the trailer's padlock. Upon opening the trailer, agents immediately observed multiple duffle bags; a certified K9 alerted to the presence of narcotic odor, and inspection revealed numerous kilogram-sized packages of suspected narcotics.
- The search yielded 80-kilogram bundles of cocaine and 30-kilogram bundles of heroin/opium, packaged in multiple bags and a plastic tote. Four bags and one plastic tote were located: gray/black roller bags each contained 25 kilograms of cocaine, black Puma bags contained 15 foil-wrapped bundles of a brown tar-like substance (heroin/opium), and a plastic tote contained 30 kilograms of cocaine, for totals of 80-kilogram bundles of cocaine and 30-kilogram bundles of heroin/opium.
- Field testing confirmed the presence of cocaine hydrochloride among the seized items, with packaged weights totaling approximately 9500 grams of cocaine and 4400 grams of heroin. Eighty bundles of white powder tested positive as cocaine HCL (packaged weight 95 kilograms), and 30 foil-wrapped bundles of brown tar-like substance weighed 44 kilograms.
- Lovejeet Singh was taken into custody. During a post-arrest interview Lovejeet Singh stated he previously drove for KWT in 2025 and had rejoined KWT for this trip. Lovejeet Singh reported that he and Prabhjot Singh met two days earlier in Ripon, California,

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where they met with Gurpreet Singh Bahia; the truck and trailer were preloaded and sealed and he did not check the contents.

- Lovejeet Singh consented to the police searching the contents of his phone and provided them with the passcode. Found on his phone were messages with Gurpreet Singh Bahia on SMS, WhatsApp, and Telegram, along with photos of a \$1 "token," a photo of Tirath Singh's California driver's license (a defendant in a different ISP NARCINT case), and a screenshot of Arwinderjit Singh's Nebraska arrest for 242 pounds of cocaine. Prior to searching his phone, Lovejeet Singh said he did not know what cocaine was. Lovejeet had no explanation for why these were in his photo album and advised he did not personally know either of them.
- Communications showed Gurpreet Singh Bahia provided Lovejeet Singh with addresses in Bluffton, Indiana and Michigan; according to information relayed from the separate interview of Prabhjot Singh, Gurpreet Singh Bahia advised that the delivery was delayed until Monday, April 27, 2026, and asked how far they were from Bluffton, Indiana, which prompted Lovejeet Singh to plan to refuel at the Pilot before traveling there.
- Based on the totality of the circumstances—including Lovejeet Singh's operation and control of the commercial vehicle, his possession of the key to the locked trailer, the presence of matching replacement seals in the tractor, the trailer's mismatched seal, the K9 alert, the seizure of large quantities of cocaine and heroin/opium, and the incriminating communications and images on Lovejeet Singh's phones—there is probable cause to believe that Lovejeet Singh committed the offenses of controlled substance trafficking, possession of a controlled substance with intent to deliver, and possession of a controlled substance.

Section 725 ILCS 5/110-5 factors:

(1) the nature and circumstances of the offense charged;

See the narrative.

(2) the weight of the evidence against the defendant, except that the court may consider the admissibility of any evidence sought to be excluded;

The weight of the evidence against the defendant is high.

(3) the history and characteristics of the defendant, including:

(A) the defendant's character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past relating to drug or alcohol abuse, conduct, history criminal history, and record concerning appearance at court proceedings; and

(B) whether, at the time of the current offense or arrest, the defendant was on probation, parole, or on other release pending trial, sentencing, appeal, or completion of sentence for an offense under federal law, or the law of this or any other state;

Defendant's criminal history:

8613835601, Alien inadmissibility under Section 212, Unknown severity, Yuma, Arizona (CBP-OBP Station HQS).

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(4) the nature and seriousness of the real and present threat to the safety of any person or persons or the community, based on the specific articulable facts of the case, that would be posed by the defendant's release, if applicable, as required under paragraph (7.5) of Section 4 of the Rights of Crime Victims and Witnesses Act;

Releasing the defendant would create a real and present threat to the safety of any person or persons or the community. The defendant possessed a gargantuan amount of cocaine (9500 grams) packaged for distribution. Drug overdoses are one of the leading causes of injury death in adults. He is not a resident of Illinois and has no association with the state beyond his arrest. He is not a citizen of the United States and is subject to deportation. He is facing a sentence of 30 – 120 years on one of his charges. He has no motivation to return and appear before this court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

(5) the nature and seriousness of the risk of obstructing or attempting to obstruct the criminal justice process that would be posed by the defendant's release, if applicable;

Releasing the defendant would create a real and present threat to the safety of any person or persons or the community. The defendant possessed a gargantuan amount of cocaine (9500 grams) packaged for distribution. Drug overdoses are one of the leading causes of injury death in adults. He is not a resident of Illinois and has no association with the state beyond his arrest. He is not a citizen of the United States and is subject to deportation. He is facing a sentence of 30 – 120 years on one of his charges. He has no motivation to return and appear before this court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

Section 725 ILCS 5/110-10(b) factors:

(0.05) Not depart this State without leave of the court;

Releasing the defendant would create a real and present threat to the safety of any person or persons or the community. The defendant possessed a gargantuan amount of cocaine (9500 grams) packaged for distribution. Drug overdoses are one of the leading causes of injury death in adults. He is not a resident of Illinois and has no association with the state beyond his arrest. He is not a citizen of the United States and is subject to deportation. He is facing a sentence of 30 – 120 years on one of his charges. He has no motivation to return and appear before this court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

(1) Report to or appear in person before such person or agency as the court may direct;

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court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

- (2) **Refrain from possessing a firearm or other dangerous weapon;**

Unknown.

- (3) **Refrain from approaching or communicating with particular persons or classes of persons;**

Unknown.

- (4) **Refrain from going to certain described geographic areas or premises;**

Releasing the defendant would create a real and present threat to the safety of any person or persons or the community. The defendant possessed a gargantuan amount of cocaine (9500 grams) packaged for distribution. Drug overdoses are one of the leading causes of injury death in adults. He is not a resident of Illinois and has no association with the state beyond his arrest. He is not a citizen of the United States and is subject to deportation. He is facing a sentence of 30 – 120 years on one of his charges. He has no motivation to return and appear before this court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

- (5) **Be placed under direct supervision of the Pretrial Services Agency, Probation Department or Court Services Department in a pretrial home supervision capacity with or without the use of an approved electronic monitoring device subject to Article 8A of Chapter V of the Unified Code of Corrections;**

Releasing the defendant would create a real and present threat to the safety of any person or persons or the community. The defendant possessed a gargantuan amount of cocaine (9500 grams) packaged for distribution. Drug overdoses are one of the leading causes of injury death in adults. He is not a resident of Illinois and has no association with the state beyond his arrest. He is not a citizen of the United States and is subject to deportation. He is facing a sentence of 30 – 120 years on one of his charges. He has no motivation to return and appear before this court if released, every reason to flee the state and/or country, and is unlikely to follow any conditions that include his future appearance if he is released from custody.

- (6) **For persons charged with violating Section 11-501 of the Illinois Vehicle Code, refrain from operating a motor vehicle not equipped with an ignition interlock device, as defined in Section 1-129.1 of the Illinois Vehicle Code, pursuant to the rules promulgated by the Secretary of State for the installation of ignition interlock devices. Under this condition the court may allow a defendant who is not self-employed to operate a vehicle owned by the defendant's employer that is not equipped with an ignition interlock device in the course and scope of the defendant's employment;**

Not applicable.

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- (7) **Comply with the terms and conditions of an order of protection issued by the court under the Illinois Domestic Violence Act of 1986 or an order of protection issued by the court of another state, tribe, or United States territory;**

Not applicable.

- (8) **Sign a written admonishment requiring that he or she comply with the provisions of Section 110-12 regarding any change in his or her address. The defendant's address shall at all times remain a matter of record with the clerk of the court;**

To be determined by the court.

- (9) **Such other reasonable conditions as the court may impose, so long as these conditions are the least restrictive means to achieve the goals listed in subsection (b), are individualized, and are in accordance with national best practices as detailed in the Pretrial Supervision Standards of the Supreme Court.**

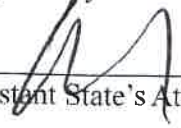
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- 5) And no condition or combination of conditions set forth in subsection (b) of 725 ILCS 5/110-10 can mitigate the real and present threat to the safety of any person or persons or the community or mitigate the threat or risk of flight.

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WHEREFORE the People move that this court deny the defendant pretrial release and enter an order detaining the defendant.

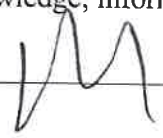
Respectfully Submitted,



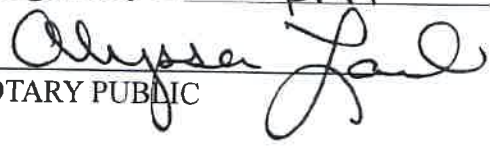
Assistant State's Attorney

VERIFICATION

Kyle Klukas, Assistant State's Attorney of Grundy County, Illinois, being first duly sworn, on his oath, deposes and says that he has read the foregoing Motion by him subscribed and that the matters and things therein stated are true to the best of his knowledge, information and belief.



Subscribed and Sworn to before me
this 27th day of April, 2026



NOTARY PUBLIC



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