
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

JOEL MENDEZ,
a/k/a "Joey Mendez,"
a/k/a "Crack"
and
ALFRED LYONS 3rd, a/k/a "Alfie"

:
: Hon. Lois H. Goodman
:
:
: Mag. No. 14-4524
:
: **CRIMINAL COMPLAINT**
:
:
:

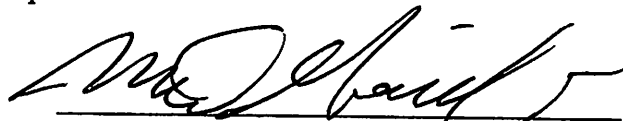
I, Michael H. Goldfinger, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Drug Enforcement Administration, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

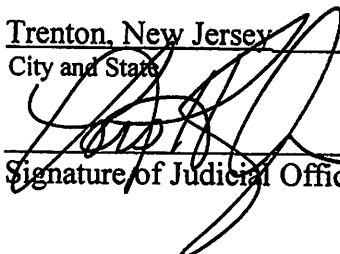


Michael H. Goldfinger, Special Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

October 15, 2014
Date
Honorable Lois H. Goodman
United States Magistrate Judge
Name and Title of Judicial Officer

at

Trenton, New Jersey
City and State

Signature of Judicial Officer

ATTACHMENT A

On or about August 22, 2014 and August 27, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendants,

JOEL MENDEZ,
a/k/a "Joey Mendez,"
a/k/a "Crack"

and

ALFRED LYONS 3rd, a/k/a "Alfie,"

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute, a quantity mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Michael H. Goldfinger, am a Special Agent with the Drug Enforcement Administration (“DEA”). I have knowledge of the facts set forth below as a result of my participation in this investigation as well as from my review of reports from, and discussions with, other law enforcement personnel. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. In or about October 2013, law enforcement officers began an investigation into JOEL MENDEZ, also known as “Joey Mendez,” also known as “Crack” (“MENDEZ”) and ALFRED LYONS 3rd, also known as “Alfie” (“LYONS”). The investigation has revealed that MENDEZ is one of the top distributors of heroin in Ocean and Monmouth Counties, New Jersey. The investigation included the use of a confidential witness (hereinafter, the “CW”), who provided law enforcement with information regarding MENDEZ’s criminal activity, including the sale of controlled substances. Specifically, the CW informed law enforcement that MENDEZ distributes high quantities of heroin and LYONS acts as the middle man between MENDEZ and his heroin customers.

2. On or about August 22, 2014, at approximately 3:15 p.m., the CW, in the presence of and at the direction of law enforcement, called LYONS in order to arrange for the purchase of 50 bricks of heroin. That call was recorded. During the call, LYONS asked the CW, “How many baseball tickets you need?” and the CW replied “50.” LYONS then advised the CW that he would be ready to sell the heroin to the CW at 9:00 p.m. that evening. Based on my knowledge, training, and experience, and on the context of the conversation, LYONS used the phrase “baseball tickets” as a code for heroin.

3. On or about August 22, 2014, at approximately 8:30 p.m., the CW, in the presence of and at the direction of law enforcement, placed a call to MENDEZ. That call was recorded. During the call, the CW told MENDEZ, “He talk to you? Cause me and him talked earlier about the 50.” MENDEZ told the CW, “Yeah, but listen. Right now at the house, my shit come in tomorrow. At the house I got like 15. You can take that and try it. You feel me?” Based on the context of the conversation, MENDEZ told the CW that he only had 15 bricks of heroin because his next batch of heroin was going to arrive the next day. The CW agreed to take the 15 bricks of heroin. MENDEZ told the CW to call LYONS to arrange to make the purchase.

4. On or about August 22, 2014, at approximately 9:26 p.m., the CW received an incoming call from LYONS. That call was recorded. During the call, LYONS agreed to meet the CW at a location in Ocean Township, New Jersey. Prior to the CW meeting with LYONS,

law enforcement provided the CW with \$1,890 to purchase the heroin and an audio recording device to record the transaction.

5. That evening, law enforcement established surveillance in the area of the prearranged meet location. At approximately 10:04 p.m., law enforcement observed LYONS arrive at the meet location. Law enforcement then observed the CW enter LYONS' vehicle and sit in the front passenger seat.

6. Once inside the vehicle, LYONS handed the CW a black plastic bag containing heroin and stated, "I got 14," meaning 14 bricks of heroin. LYONS asked the CW, "What's he giving it to you for?" meaning how much was MENDEZ charging the CW for each brick of heroin. The CW responded, "\$135" and LYONS stated, "\$1890." The CW then gave LYONS \$1,890 as payment for the heroin. Before exiting LYONS' vehicle, the CW asked, "Tomorrow is a definite, he gonna have the rest?" and LYONS confirmed that the CW would be able to purchase more heroin at a later date.

7. Law enforcement field-tested a sample of the substance that the CW purchased from LYONS and it tested positive for the presence of heroin. The glassine bags of heroin were stamped with the words "Poland Spring Water" in blue lettering. The entirety of the controlled purchase was audio recorded.

8. On or about August 27, 2014, at approximately 2:30 p.m., the CW, in the presence of and at the direction of law enforcement, placed a call to LYONS. That call was recorded. During the call, LYONS told the CW that he would be ready to meet with the CW in an hour. LYONS instructed the CW to meet LYONS and MENDEZ at a restaurant in Neptune Township, New Jersey. Prior to the CW meeting with MENDEZ and LYONS, law enforcement provided the CW with \$4,600 to purchase the heroin and an audio recording device to record the transaction.

9. That afternoon, law enforcement established surveillance in the area of the prearranged meet location. At approximately 3:24 p.m., law enforcement observed the CW arrive at the meet location. Upon entering the restaurant, the CW sat at a table with MENDEZ and LYONS and engaged in conversation. At approximately 3:52 p.m., law enforcement observed MENDEZ, LYONS, and the CW exit the restaurant. Shortly thereafter, law enforcement observed MENDEZ, LYONS, and the CW enter a vehicle driven by LYONS and depart the location. Once inside the vehicle, MENDEZ instructed LYONS on where to drive.

10. At approximately 4:10 p.m., MENDEZ, LYONS, and the CW arrived at a residence in Neptune Township and exited the vehicle. MENDEZ engaged in conversation with the CW outside the residence while LYONS entered the residence. Shortly thereafter, LYONS

exited the residence and re-entered his vehicle. MENDEZ then instructed the CW to enter the vehicle with LYONS while MENDEZ stood outside the vehicle. Once inside the vehicle, LYONS handed the CW a gray plastic bag containing 36 bricks of heroin. The CW gave LYONS \$4,600 as payment for the heroin. Shortly thereafter, LYONS and the CW exited the vehicle. With regard to the money the CW gave LYONS, MENDEZ asked LYONS, "What's this?" and LYONS stated, "46." The CW asked MENDEZ, "That's right, right?" and MENDEZ responded, "You told me four thousand six hundred and eighty, but it's alright."

11. Law enforcement field-tested a sample of the substance that the CW purchased from MENDEZ and LYONS and it tested positive for the presence of heroin. The glassine bags of heroin were stamped with the words "Final Game" in blue lettering. The entirety of the controlled purchase was audio recorded.