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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Mark Falk  
 :  
 v. : Mag. No. 20-1061  
 :  
 RASHEEN THOMAS : **CRIMINAL COMPLAINT**  
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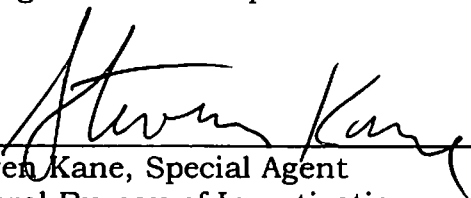
I, Steven Kane, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

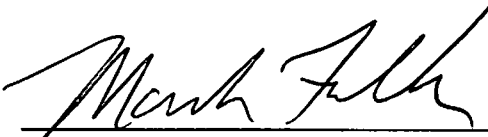
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
\_\_\_\_\_  
Steven Kane, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed via telephone  
September 14, 2020, New Jersey  
Authorized telephonically pursuant to Fed. R. Crim. P. 4.1

Honorable Mark Falk  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Distribution of Heroin and Cocaine)

During the week of June 29, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWO**

(Distribution of Heroin and Cocaine)

During the week of July 6, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THREE**

(Distribution of Heroin and Cocaine)

During the week of July 20, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOUR**

(Distribution of Heroin and Cocaine)

During the week of July 27, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

(Distribution of Heroin and Cocaine)

During the week of August 3, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIX**

(Distribution of Heroin and Cocaine)

During the week of August 10, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RASHEEN THOMAS,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

## **ATTACHMENT B**

I, Steven Kane, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and 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. Law enforcement has been investigating Rasheen Thomas (“THOMAS”) for the distribution of controlled substances in and around Newark, New Jersey.

2. During the week of June 29, 2020, law enforcement utilized a confidential source (the “CS”) to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately one brick<sup>1</sup> of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.

3. During the week of July 6, 2020, law enforcement utilized the CS to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately two bricks of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.

4. During the week of July 20, 2020, law enforcement utilized the CS to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately two bricks

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<sup>1</sup>A “brick” commonly refers to approximately fifty single-dose packets, or glassine envelopes, of heroin, often packaged as five “bundles”—the term commonly used to describe a compilation of ten glassine envelopes—grouped together.



of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.

5. During the week of July 27, 2020, law enforcement utilized the CS to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately four bricks of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.

6. The suspected heroin was subsequently submitted to a lab and the results indicated that the substance contained both heroin and fentanyl.

7. During the week of August 3, 2020, law enforcement utilized the CS to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately four bricks of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.

8. The suspected heroin was subsequently submitted to a lab and the results indicated that the substance contained both heroin and fentanyl.

9. During the week of August 10, 2020, law enforcement utilized the CS to purchase controlled substances from THOMAS. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached THOMAS and purchased approximately four bricks of suspected heroin and ten vials of suspected cocaine from THOMAS in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an undisclosed location.