
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Edward S. Kiel, U.S.M.J.
	:	
v.	:	Mag. No. 20-15209
	:	
LESTER HICKS,	:	
a/k/a "Mayhem"	:	
	:	CRIMINAL COMPLAINT


I, Mark Thompson, 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 Deputy Marshal with the United States Marshals Service and that this Complaint is based on the following facts:

SEE ATTACHMENT B

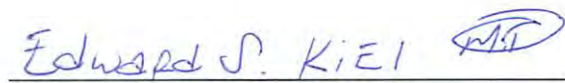
continued on the attached page and made a part hereof.


Mark Thompson,
Special Deputy Marshal
United States Marshals Service

Special Deputy Thompson attested to this Affidavit by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A).

Sworn to and subscribed via telephone this 22nd day of April, 2020 in New Jersey

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Heroin)

On or about March 8, 2020, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LESTER HICKS,
a/k/a "Mayhem,"

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

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

ATTACHMENT B

I, Mark Thompson, am a Special Deputy Marshal with the United States Marshals Service. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. 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. On or about March 8, 2020, law enforcement officers with the Essex County Sheriff's Office were patrolling in and around Clinton and Avon Avenues in Newark, New Jersey. They observed a vehicle, namely a Chevrolet Impala (the "Impala"), run a red light, and therefore they followed the vehicle and activated their lights. The officers determined that the Impala's temporary registration was not on file.

2. Upon exiting their marked vehicle, one officer approached the driver's side of the Impala and the other officer approached the passenger side of the Impala. The driver was told the reasons for the vehicle stop. Meanwhile, despite several requests to keep his hands out of his pockets, the passenger, subsequently identified as LESTER HICKS, a/k/a "Mayhem," continued to place his hands in his front pockets to adjust his waistband. Based on the officers' training and experience, the officers believed that LESTER HICKS was concealing contraband – either a weapon or narcotics – in his waistband. Accordingly, for officer safety, they ordered the driver and LESTER HICKS to exit the Impala.

3. As other backup units arrived, a records check revealed that there was an active warrant for the arrest of LESTER HICKS. A search incident to his arrest led to the recovery of approximately 78 glassine envelopes of heroin and approximately \$121 in small denominations. Approximately 28 envelopes were stamped "Terminator" in red ink, and approximately 50 envelopes were stamped "G" in red ink. Based on the officers' training and experience, these markings and packaging were consistent with the distribution of heroin, namely a brick¹ and a half of a substance with the same consistency as heroin. In addition, based on my training and experience, I know that small

¹ A "brick" of heroin commonly refers to approximately 50 decks, or 5 bundles, of heroin, often packaged together. A "deck" of heroin commonly refers to a single-dose packet, or glassine envelope, of heroin. A "bundle" of heroin commonly refers to approximately 10 decks of heroin, often packaged together.

denominations of currency is indicative of street-level narcotics sales and distribution.

4. After law enforcement recovered the suspected heroin, the driver was issued several summonses.

5. LESTER HICKS was charged, processed, given a copy of a summons with a future court date and released.

6. Later that same day, the driver and LESTER HICKS were involved in a shootout in and around Martin Luther King Boulevard in Newark, New Jersey. The shootout was captured on video, and LESTER HICKS has been identified as one of the shooters.