
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CRIMINAL COMPLAINT

UNITED STATES OF AMERICA : Honorable Mark Falk
v. : Mag. No. 20-1111
ANTOINE HAWKINS :

I, Marilyn Gonzalez, the undersigned complainant 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 with the United States Marshals Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Marilyn Gonzalez

Marilyn Gonzalez, Special Deputy
United States Marshals Service

Special Deputy Gonzalez attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on September 16, 2020 in the District of New Jersey

Mark Falk

Honorable Mark Falk
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about September 16, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTOINE HAWKINS,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce a firearm, namely a 9mm Springfield Armory XDM pistol, bearing manufacturer's serial number MG920030, and nineteen (19) rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Possession with Intent to Distribute Heroin)

On or about September 16, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTOINE HAWKINS,

did knowingly and intentionally possess with the 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, Marilyn Gonzalez, am a Special Deputy with the United States Marshals Service (“USMS”). 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 that I know concerning this investigation. 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. Law enforcement has been investigating a shooting (the “Osborne Terrace Shooting”) that occurred on or about August 18, 2020 at approximately 9:37 a.m. in the vicinity of Osborne Terrace in Newark, New Jersey. Law enforcement responded to the scene, located ballistic evidence and retrieved video surveillance footage. Thereafter, law enforcement identified a person of interest in the Osborne Terrace Shooting.

2. On or about September 16, 2020, law enforcement conducted a surveillance operation in search of the person of interest in the Osborne Terrace Shooting. During the surveillance operation, a law enforcement officer (“Officer-1”) approached an individual, later identified as Antoine Hawkins (“HAWKINS”), who appeared to be the person of interest in the Osborne Terrace Shooting. At that time, HAWKINS was standing in a driveway on Shephard Avenue in Newark. During a conversation between Officer-1 and HAWKINS, Officer-1 observed what appeared to be the imprint of a firearm on HAWKINS’s jacket.

3. Officer-1 frisked HAWKINS and seized the item that caused the imprint on HAWKINS’s jacket. The item was a 9mm Springfield Armory XDM pistol, bearing manufacturer’s serial number MG920030 (the “Firearm”), which was loaded with nineteen (19) rounds of 9mm ammunition (the “Ammunition”).

4. After HAWKINS was arrested for possessing the Firearm and the Ammunition, law enforcement executed a search warrant inside of HAWKINS’s residence on Shephard Avenue, which search warrant was premised on, among other things, the investigation into the Osborne Terrace Shooting. The execution of that search warrant revealed, among other items, 626 glassine envelopes containing suspected heroin, three (3) 9mm magazines, and mail addressed to HAWKINS.

5. The Firearm and the Ammunition were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to HAWKINS’s possession of the Firearm and the Ammunition in New Jersey on September 16, 2020.

6. On or about April 23, 2018, HAWKINS was convicted of the following crime in the Superior Court of New Jersey, Essex County: Manufacturing/Distributing a Controlled Dangerous Substance, a third degree crime, in violation of N.J.S.A. 2C:35-5A(1), a crime punishable by imprisonment for a term exceeding one year.

7. On or about November 22, 2019, HAWKINS was convicted of the following crime in the Superior Court of New Jersey, Essex County: Manufacturing/Distributing a Controlled Dangerous Substance, a third degree crime, in violation of N.J.S.A. 2C:35-5A(1), a crime punishable by imprisonment for a term exceeding one year.