

ATTACHMENT A

Count One
(Importation of Controlled Substances)

On or about October 23, 2020, at Newark International Airport, in Essex County, in the District of New Jersey and elsewhere, defendant

LEANDRE KEMONT JEFFERSON

did knowingly and intentionally import into the United States from a place outside thereof, namely the Dominican Republic, 500 grams or more of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a) and 960(b)(2)(B)(ii).

ATTACHMENT B

I, Celia E. Pierce, am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including documents and physical evidence. 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 the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. 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 October 23, 2020, defendant LEANDRE KEMONT JEFFERSON ("JEFFERSON") arrived at Newark Liberty International Airport in the District of New Jersey ("Newark Airport") aboard an inbound airline flight originating from an airport in Puerto Plata, Dominican Republic.

2. Upon his arrival at Newark Airport, officers of the United States Customs and Border Protection ("CBP") stopped defendant JEFFERSON for an inbound screening that included a search of the luggage that was in his possession.

3. During the screening, CBP officers discovered that defendant JEFFERSON possessed approximately 2.08 kilograms of a substance that subsequently field tested positive for the presence of cocaine. The cocaine was contained inside of approximately twelve vacuum packed bags, which were themselves wrapped in foil, and which was further concealed inside of clothing.

4. During a subsequent voluntary interview with law enforcement agents, and after being advised of and waiving his Miranda rights, defendant JEFFERSON admitted that he knew that the substance in his possession was cocaine.