

1:22-mj-40

AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE

I, Dennis A Carter, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Department of Homeland Security, US Immigration & Customs Enforcement (ICE), Homeland Security Investigation (HSI). I have been employed as a Special Agent since May 10, 2001. I graduated from the Federal Law Enforcement Training Center (FLETC) having successfully completed the Criminal Investigator Training Program (CITP) and Customs Basic Enforcement Training.

2. I make this affidavit pursuant to Rules 4(a) and 5(b) of the Federal Rules of Criminal Procedure to establish probable cause that Wayne JEFFERS committed violations of Title 21 U.S.C. § 841, Possession with Intent to Distribute contraband, to wit cocaine.

3. The statements and information in this Affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that Wayne JEFFERS has committed a violation of Title 21 U.S.C. § 841, Possession with Intent to Distribute a Controlled Substance and Title 21 U.S.C. § 846, Conspiracy to Possession of a Controlled Substance.

4. In summary, the following facts establish that there is probable cause to believe that Wayne JEFFERS violated Title 21 U.S.C. § 841, Possession with Intent to Distribute a Controlled Substance and violation of Title 21 U.S.C. § 846, Conspiracy to Possession with Intent to Distribute a Controlled Substance.

FACTS IN SUPPORT OF PROBABLE CAUSE

5. On or about May 11, 2022, at approximately 0550hrs US Customs and Border Officer (CBPO) Richard Anderson while conducted a security sweep at the Henry E. Rohlsen Airport observed a tarpaulin on the driver side floor of a ladder truck on the ramp side of the airport. Officer Anderson noticed that the tarpaulin was unusual and out of place in the truck. Upon further examination, Officer Anderson noticed that the tarpaulin was resting atop a black

suitcase. Officer Anderson opened the black suitcase and immediately observed several brick-like objects.

6. The black suitcase was eventually seized. A search of the black suitcase discovered twelve (12) brick like objects that tested positive for cocaine. The approximate weight of the cocaine was approximately 12.6 kilograms (kg).

7. Homeland Security Investigation (HSI) Special Agent (SA) Dennis Carter was contacted and responded to the airport. HSI and CBP reviewed surveillance video to try to determine how the black suitcase got into the ladder truck.

8. The review of the video footage revealed that on the morning of May 11, 2022, at approximately 0115hrs, a Virgin Islands Port Authority (VIPA) vehicle approached the area of the ladder truck without any lights. The VIPA vehicle remained in the area for approximately 2 minutes before reversing back out, again with no lights.

9. A review of the security log at the entry gate into the ramp area of the airport revealed that VIPA Officer Wayne JEFFERS was signed in at approximately 0110hrs and out at approximately 0120hrs. The investigation also revealed that Wayne JEFFERS was the only VIPA working on that day and time of the night.

10. On May 11, 2022, at approximately 2230hrs, VIPA Officer Wayne JEFFERS was brought to the HSI St. Croix office for questioning. At approximately 2241hrs, SA Brien Webber as witnessed by SA Dennis Carter and SA Timothy Krisik, read JEFFERS his Miranda warnings which he voluntarily waived and agreed to answer our questions.

11. During questioning Wayne JEFFERS admitted to placing the black suitcase into the ladder truck. JEFFERS stated that he was not sure what was in the black suitcase, but that he was told it would be drugs. JEFFERS stated that he was going to get paid Fifty Thousand Dollars (\$50,000) to place the black suitcase into the truck.

CONCLUSION

12. Based on the foregoing facts, I believe that probable cause exists to charge Wayne JEFFERS with Possession with Intent to Distribute a Controlled Substance, in violation of Title 21 U.S.C. § 841 and Conspiracy to Possessed with Intent to Distribute a Controlled Substance in violation of Title 21 U.S.C. § 846.

Respectfully submitted,

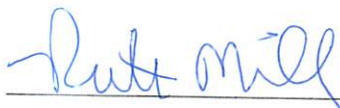
A handwritten signature in blue ink, appearing to read "Dennis A. Carter", written over a horizontal line.

Dennis A Carter

Special Agent

Homeland Security Investigations

Subscribed and sworn to before me *via telephone*
on May 19 2022:

A handwritten signature in blue ink, appearing to read "Ruth Miller", written over a horizontal line.

HONORABLE RUTH MILLER

United States Magistrate Judge