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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Minnesota

UNITED STATES OF AMERICA

v.

ZACHARY VICTOR ROBINSON

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)

SEALED UNDER ORDER OF THE COURT

Case No. 20-mj-505 (KMM)

CRIMINAL COMPLAINT

I, Kristofer Johnson, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1: On or about December 31, 2019, in the State and District of Minnesota, the defendant, ZACHARY VICTOR ROBINSON, having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely, first-degree assault – great bodily harm, convicted in or about April 2010, second-degree assault with a dangerous weapon, convicted in or about April 2010, and felony domestic assault, convicted in or about January 2018, all in Hennepin County, Minnesota, and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, Taurus, model PT111 Millennium G2, 9mm-caliber semiautomatic pistol, bearing serial number TKR09333, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

I further state that I am a sworn and licensed federal Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT OF KRISTOFER JOHNSON

Continued on the attached sheet and made a part hereof: Yes No


Complainant's signature

Kristofer Johnson, ATF Special Agent
Printed name and title

SUBSCRIBED and SWORN to before me,
by reliable electronic means (Zoom and
email), pursuant to Fed. R. Crim. P. 41(d)(3),

Date: 7/9/2020


Judge's signature

City and state: Minneapolis, Minnesota

Katherine M. Menendez, U.S. Magistrate Judge
Printed name and title

in Hennepin County, Minnesota and an active arrest warrant was issued for ROBINSON's arrest.

3. On 12/31/19, in relation to the arrest warrant, Minneapolis Police Officers were conducting surveillance at a residence on Zane Ave North, Brooklyn Park, MN. After a short while, Officers observed ROBINSON exit the address with trash bags in his hand.

4. Officers approached ROBINSON to arrest him on the warrant, identified themselves as police officers, and ordered ROBINSON to put his hands in the air. ROBINSON complied and stated, "I've got a gun on my left side."

5. Officers searched ROBINSON incident to his arrest and recovered the firearm from ROBINSON's side and took him into custody. The firearm recovered was a Taurus, model PT111 Millennium G2, 9mm-caliber semiautomatic pistol, bearing serial number TKR09333. ATF SA Bryan Lervoog, a firearm nexus expert, informed Your Affiant that Taurus semiautomatic pistols are not manufactured in the State of Minnesota.

6. A review of ROBINSON's criminal history shows three prior felony convictions, each of which is punishable under the laws of the State of Minnesota by a term exceeding one-year imprisonment, namely, First-Degree Assault – Great Bodily Harm, convicted in April 2010 and sentenced to 86 months' imprisonment, Second-Degree Assault with a Dangerous Weapon (a firearm), convicted in April 2010 and sentenced to 36 months' imprisonment, and Felony Domestic Assault, convicted in January 2018 and sentenced to 24 months' imprisonment. All three felony convictions were in Hennepin County, Minnesota.

7. Based on the foregoing, Your Affiant has probable cause to believe that Zachary Victor ROBINSON (YOB 1993), committed the offense of being a Felon in Possession of a Firearm, on or about December 31, 2019, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

8. ROBINSON is not currently in custody and his whereabouts are currently unknown.

REQUEST TO SEAL DOCUMENTS

9. The current investigation is ongoing, and the relevant documents associated with the Complaint-warrant application discuss an ongoing criminal investigation that is neither public nor known to the potential target(s) of the investigation. There is reasonable cause to believe that disclosure of the contents of this Affidavit, the complaint, the arrest warrant, and any associated documents may cause the target(s) of the investigation to destroy or conceal evidence, change patterns of behavior, notify confederates, tamper with witnesses, flee the jurisdiction, or otherwise impede the ongoing investigation and thereby hinder the opportunity to pursue leads developing out of the current investigation which would seriously jeopardize the investigation and hinder successful prosecution of the target(s). Your Affiant, therefore, respectfully requests that the Court order that all

documents in support of this Complaint, including the Affidavit and warrant, be sealed until further order by the Court.

Respectfully submitted,



KRISTOFER JOHNSON

Special Agent – Bureau of Alcohol, Tobacco,
Firearms, and Explosives

SUBSCRIBED and SWORN to Before Me,
by reliable electronic means (FaceTime and
email), pursuant to Fed. R. Crim. P. 41(d)(3), on

This 9 day of July, 2020,



KATHERINE M. MENEDEZ
UNITED STATES MAGISTRATE JUDGE