
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Hon. José R. Almonte
	:	
MUNIR MUHAMMAD,	:	Mag. No. 23-16048
a/k/a "Mu"	:	
	:	

I, Laejon C. Brooks, 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 Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Laejon C. Brooks

Laejon C. Brooks, Special Agent
Bureau of Alcohol, Tobacco, Firearms &
Explosives

Special Agent Laejon Brooks attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on April 13, 2023, in the District of New Jersey

Honorable José R. Almonte
United States Magistrate Judge

Jose R. Almonte

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of a Machine Gun)

On or about April 12, 2023, in the District of New Jersey and elsewhere,
the defendant,

**MUNIR MUHAMMAD,
a/k/a “Mu,”**

did knowingly possess a machine gun, as defined in Title 26, United States Code, Section 5845(b), namely, a 9mm Glock 17, bearing serial number BRML191, equipped with an extended magazine containing 30 rounds of ammunition and an auto sear selector switch.

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

COUNT TWO

(Possession of an Unregistered Firearm)

On or about April 12, 2023, in the District of New Jersey and elsewhere,
the defendant,

**MUNIR MUHAMMAD,
a/k/a “Mu,”**

did knowingly possess a machine gun, as defined in Title 26, United States Code, Section 5845(b), namely, a 9mm Glock 17, bearing serial number BRML191, equipped with an extended magazine containing 30 rounds of ammunition and an auto sear selector switch, which was not registered to him in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(d).

ATTACHMENT B

I, Laejon Brooks, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Where statements of others are related herein, they are related in substance and part. 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 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. Since at least as early as 2021, law enforcement has been investigating a series of retaliatory shootings between rivaling neighborhoods that operate in Newark, New Jersey. Specifically, law enforcement has investigated numerous shootings committed by individuals who operate in the area of Clinton Place and Weequahic Avenue, which is known on the street as “Cake Block,” who are aligned with individuals who operate in the area of Vorhees Street and individuals who operate in and around the Bradley Court Housing Complex. The investigation, which has included a review of lawfully recorded calls, the use of confidential sources, and other means, has revealed that Munir Muhammad, a/k/a “Mu” (“MUHAMMAD”) is a member and associate of this neighborhood street gang. Moreover, the investigation has revealed that MUHAMMAD and his fellow gang members have committed numerous shootings which have targeted individuals who operate in the area of the Oscar Miles Housing Complex and Goodwin Avenue.

2. For example, on or about November 16, 2021, law enforcement responded to a shooting at the Oscar Miles Housing Complex, which shooting resulted in the death of one victim and the non-fatal shooting of a second victim. Shortly thereafter, law enforcement responded to retaliatory shootings in the area of Voorhees Street and the Bradley Court Housing Complex.

3. On or about April 8, 2023, law enforcement responded to a shooting in the area of the Oscar Miles Housing Complex following a ShotSpotter activation. Upon arrival, law enforcement discovered three shooting victims, one of whom remains in critical condition. Confidential sources who have proven reliable in prior investigations reported to law enforcement that MUHAMMAD and fellow gang members committed the shooting at the Oscar Miles Housing Complex.

4. Further, on or about April 9, 2023—the morning after the shooting—MUHAMMAD was depicted in a social media post with a fellow gang member gesturing toward the camera in a manner consistent with holding a firearm. This post contained music, the lyrics for which stated, “Put that switchy on ya man, he ain’t get up bullets f***in’ up his body, he doin’ sit ups.” Based on my

training and experience, the reference to “switchy” is a reference to a “switch,” otherwise known as a machinegun conversion device (“MCD”), which transforms a semi-automatic handgun into a weapon capable of emptying an entire magazine with a single pull of the trigger. Based on the investigation to date as set forth herein, law enforcement believes that this social media post was a direct response to the shooting that had occurred hours earlier.

5. On or about April 12, 2023, law enforcement received information from a confidential source who has proven reliable in numerous prior investigations that MUHAMMAD was in possession of a firearm. Utilizing various investigative techniques, law enforcement located MUHAMMAD in a residence on Broad Street in Newark and commenced surveillance. During that surveillance, law enforcement observed MUHAMMAD exit the residence on Broad Street holding and adjusting his waistband and looking up and down the street. MUHAMMAD then entered the rear passenger seat of a Lyft vehicle, immediately after which law enforcement conducted an investigative stop. During a frisk for weapons, law enforcement immediately felt a firearm with an extended magazine in MUHAMMAD’s waistband. That firearm was revealed to be a 9mm Glock 17, bearing serial number BRML191,¹ which was equipped with an extended magazine containing 30 rounds of ammunition² and an auto sear selector switch, which rendered the firearm capable of being fired in fully automatic mode (the “Machinegun”). In light of the auto sear selector switch, the Machinegun meets the federal definition of a machinegun, as defined in Title 26, United States Code, Section 5845(b).

6. A subsequent ballistics analysis of the Machinegun confirmed that the Machinegun fired 28 rounds during the April 8, 2023 shooting at the Oscar Miles Housing Complex.

7. The Machinegun was not registered to MUHAMMAD in the National Firearms Registration and Transfer Record.

¹ The 9mm Glock 17, bearing serial number BRML191 was reported stolen out of East Orange, New Jersey, on or about April 27, 2022.

² Twenty-three of the rounds were hollow point and seven rounds were critical defense rounds.