

ATTACHMENT A

COUNT ONE

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

On or about August 3, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JALIL BURNS,
a/k/a “Big Ben,”

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition—namely, a .40 caliber Taurus Model 740 semi-automatic handgun, bearing serial number SGY42784, loaded with six rounds of .40 caliber ammunition.

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

COUNT TWO

(Possession with Intent to Distribute Phencyclidine)

On or about August 3, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JALIL BURNS,
a/k/a “Big Ben,”

knowingly and intentionally did possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of Phencyclidine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about August 3, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JALIL BURNS,
a/k/a “Big Ben,”

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the possession with intent to distribute Phencyclidine charged in Count Two of this Criminal Complaint, did knowingly possess a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ATTACHMENT B

I, David L. Scanlon, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and 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 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 and time, I am asserting that it took place on or about the date and time alleged.

1. On or about August 3, 2020, members of the Jersey City Police Department were conducting proactive patrol when they observed a vehicle traveling at a high rate of speed. As a result of this observation, officers activated their lights and sirens to conduct a motor vehicle stop.

2. The vehicle had three occupants: (1) the driver; (2) Jalil Burns, a/k/a "Big Ben" ("BURNS"), who was seated in the front passenger seat; and (3) a rear passenger occupant. As officers approached the car, they noticed a strong odor of Phencyclidine, more commonly known as PCP.

3. As BURNS exited the vehicle at the officers' direction, officers observed that BURNS was wearing a black fanny pack across his shoulder. As officers began to conduct a pat down for officer safety, BURNS stated, "I don't want no problems, I got it on me."

4. As the officers placed the fanny pack on top of the vehicle, they heard a sound consistent with a heavy metal object.

5. The fanny pack contained a .40 caliber Taurus Model 740 semi-automatic handgun, bearing serial number SGY42784, loaded with six rounds of .40 caliber ammunition. In addition, the fanny pack contained, among other items, a clear jar containing Phencyclidine, packaged in a manner consistent with distribution.

6. Prior to BURNS's possession of the Firearm and Ammunition in New Jersey on or about August 3, 2020, the Firearm moved in interstate commerce.

7. On or about September 11, 2009, BURNS was convicted in the United States District Court for the District of New Jersey, of Unlawful Possession of a Firearm by a Convicted Felon, in violation of Title 18, United States Code, Section 922(g)(1), a crime punishable by imprisonment for a term exceeding one year, and for which BURNS was sentenced to a term of thirty-seven months' imprisonment.