
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable Cathy L. Waldor
v. : Mag. No. 21- 9147
RAHIM HARRIS and : CRIMINAL COMPLAINT
HANEEFHA WHITE :

I, Veronica R. Morales-Miller, 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

Continued on the attached page and made a part hereof:



Veronica R. Morales-Miller, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A) on March 19, 2021
in the District of New Jersey

HONORABLE CATHY L. WALDOR
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about March 15, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

RAHIM HARRIS,

knowing 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 interstate commerce firearms and ammunition, namely, a) a .357 caliber Glock Model 32 Gen 3 semiautomatic handgun, bearing serial number VHV766, which was loaded with twenty-three rounds of ammunition; b) a .223 caliber American Tactical Model Milisport semiautomatic rifle, bearing serial number MSA019592; c) a .410-gauge American Tactical Onni-Hybrid shotgun, bearing serial number NS125222; d) a .40 caliber Smith & Wesson Model SD40VE semiautomatic handgun, bearing serial number FBB0253, which was loaded with one round of ammunition; e) a 5.7x28-millimeter FN Herstal Model 57 semiautomatic handgun, bearing serial number 386364213, which was loaded with fifteen rounds of ammunition; f) a .380 caliber Taurus Model PT738 semiautomatic handgun, bearing serial number 1D102429; g) a multi-caliber Sig MCX Rattler semiautomatic rifle, bearing serial number 63F025847, which was loaded with fifteen rounds of ammunition; h) a 12-gauge Mossberg Model 500 pump action shotgun, bearing serial number V0546020; i) a high-capacity drum magazine containing several rounds of .223 ammunition; j) a high-capacity magazine containing twenty-nine rounds of .300 caliber ammunition; k) twenty-three rounds of .357 caliber ammunition; l) nineteen rounds of 5.7x28-millimeter ammunition; l) a box containing several rounds of .357 caliber ammunition; m) six rounds of .380 caliber ammunition; n) eight rounds of 12-gauge shotgun ammunition; o) one round of .410-gauge shotgun ammunition; and p) multiple rounds of loose ammunition.

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

COUNT TWO

(Aiding and Abetting the Possession of Firearms by a Convicted Felon)

On or about March 15, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

HANEEFHA WHITE,

knowingly aided and abetted the possession of firearms, namely, a) a .40 caliber Smith & Wesson Model SD40VE semiautomatic handgun, bearing serial number FBB0253; b) a 5.7x28-millimeter FN Herstal Model 57 semiautomatic handgun, bearing serial number 386364213; c) a .380 caliber Taurus Model PT738 semiautomatic handgun, bearing serial number 1D102429; d) a multi-caliber Sig MCX Rattler semiautomatic rifle, bearing serial number 63F025847; and e) a 12-gauge Mossberg Model 500 pump action shotgun, bearing serial number V0546020, all of which were in and affecting interstate commerce, by Rahim Harris, who had previously been convicted of a crime punishable by a term of imprisonment exceeding one year.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

ATTACHMENT B

I, Veronica Morales-Miller, am a Special Agent 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 photographs of the 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. On or about November 21, 2007, defendant Rahim Harris ("Harris") was convicted in the United States District Court for the Middle District of Pennsylvania, for conspiracy to distribute heroin, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), in violation of Title 21, United States Code, Section 846, an offense punishable by a term of imprisonment of more than one year.

2. On or about December 21, 2019, a criminal complaint and arrest warrant (the "Arrest Warrant") were filed in Newark, New Jersey against Harris for weapons and aggravated assault offenses allegedly committed on that date.

3. On or about March 14, 2021, law enforcement received a tip regarding Harris's whereabouts. Specifically, the tip provided the name of a hotel in Secaucus, New Jersey (the "Hotel"), as well as the number of the room (the "Room") that Harris was staying in. Law enforcement then responded to the Hotel a few hours later to attempt to locate Harris and execute the Arrest Warrant. Upon arriving at the Hotel, an employee identified Harris from a photograph as an individual who had been staying in the Room.

4. Law enforcement then set up surveillance in the Hotel and observed a female, later identified as Harris's wife, Haneefha White ("White"), entering the Room from the hallway. They attempted to summon White to their location in the hallway, but she entered the Room and closed the door. White then called the front desk and asked why police were in the hallway.

5. Law enforcement then spoke with White several times on the telephone, attempting without success to persuade her to come out of the Room. During the conversations, White indicated that there were several other individuals in the Room with her, and that they were "on edge" and had firearms and hand grenades in the Room.

6. After several hours of unsuccessful negotiations with White, law enforcement called the Room and Harris picked up the phone. Harris stated that he did not want to come out of the Room because of the Arrest Warrant. Harris

also stated that he was "prepared for war" and "ready to die."

7. Eventually, in the morning hours of on or about March 15, 2021, Harris and White (who were the only occupants of the Room) came out of the Room and surrendered. A lawful search of the Room yielded the following:

- a) a stolen .357 caliber Glock Model 32 Gen 3 semiautomatic handgun, bearing serial number VHV766, which was loaded with twenty-three rounds of ammunition;
- b) a .223 caliber American Tactical Model Milisport semiautomatic rifle, bearing serial number MSA019592;
- c) a .410-gauge American Tactical Onmi-Hybrid shotgun, bearing serial number NS125222;
- d) a .40 caliber Smith & Wesson Model SD40VE semiautomatic handgun, bearing serial number FBB0253, which was loaded with one round of .40 caliber ammunition;
- e) a 5.7x28-millimeter FN Herstal Model 57 semiautomatic handgun, bearing serial number 386364213, which was loaded with fifteen rounds of ammunition;
- f) a .380 caliber Taurus Model PT738 semiautomatic handgun, bearing serial number 1D102429;
- g) a multi-caliber Sig MCX Rattler semiautomatic rifle, bearing serial number 63F025847, which was loaded with fifteen rounds of ammunition;
- h) a 12-gauge Mossberg Model 500 pump action shotgun, bearing serial number V0546020;
- i) a high-capacity drum magazine containing several rounds of .223 ammunition;
- j) a high-capacity magazine containing twenty-nine rounds of .300 caliber ammunition;
- k) twenty-three rounds of .357 caliber ammunition;
- l) nineteen rounds of 5.7x28-millimeter ammunition;
- m) six rounds of .380 caliber ammunition;

- n) eight rounds of 12-gauge shotgun ammunition;
- o) one round of .410-gauge shotgun ammunition;
- p) multiple rounds of loose ammunition

(collectively, the "Firearms and Ammunition").

8. Law enforcement also found the following in the Room:

- q) fourteen firearm ammunition magazines;
- r) an inert hand grenade;
- s) \$36,910 in United States currency;
- t) a fraudulent Delaware identification card;
- u) a fraudulent Florida identification card;
- v) a registration for 2016 Porsche Cayenne; and
- w) miscellaneous bank cards.

9. After their arrests, Harris and White both voluntarily and knowingly waived their Miranda rights and provided recorded statements. Harris admitted, in substance and in part, that the firearms listed above in paragraphs 7(a) and 7(b) belonged to him, and that he had purchased them "on the street." White admitted, in substance and in part, that she previously purchased several of the firearms found in the Room and transported them to New Jersey. Law enforcement determined that the firearms listed in paragraphs 7(d) through 7(h) were lawfully purchased by White in Pennsylvania.

10. The Firearms and Ammunition were manufactured outside the State of New Jersey. Therefore, the Firearms and Ammunition necessarily moved in interstate commerce prior to March 15, 2021.