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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
:   
v. : Honorable Andre M. Espinosa  
:   
GREGORY DORCEUS : Mag. No. 21-11315  
:

I, Michael Meawad, 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**

Michael Meawad  
Michael Meawad, Special Agent  
Bureau of Alcohol Tobacco Firearms and Explosives

Sworn to and subscribed via telephone  
November 15, 2021, New Jersey  
Authorized telephonically pursuant to Fed. R. Crim. P. Rule 4.1

Hon. Andre M. Espinosa  
United States Magistrate Judge

s/ The Honorable Andre M. Espinosa  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

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

On or about September 16, 2021, in Union County, in the District of New Jersey and elsewhere, the defendant,

**GREGORY DORCEUS,**

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, namely, a Ruger, model P95DC, 9mm handgun, bearing serial number 312-10699, and ammunition, namely four live ball point rounds of 9mm ammunition.

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

## **ATTACHMENT B**

I, Michael Meawad, 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 September 16, 2021, members of the Elizabeth Police Department (the "OFFICERS") received a report of an individual in possession of a firearm in the area of Jefferson Park in Elizabeth, New Jersey.

2. The OFFICERS responded to Jefferson Park and observed Gregory Dorceus ("DORCEUS") in the park matching the description that was provided. The OFFICERS exited their marked patrol vehicle and approached DORCEUS in order to further investigate. DORCEUS attempted to leave the area and ignored the OFFICER's commands to stop requiring the OFFICERS to physically restrain him.

3. As the OFFICERS restrained DORCEUS, he reached for his waistband and attempted to ball up in the fetal position. The OFFICERS then conducted a pat down of DORCEUS and felt a hard metal object in his groin area which the OFFICERS immediately recognized to be a handgun. The OFFICERS then retrieved the handgun and identified it as a Ruger, model P95DC, 9mm handgun, bearing serial number 312-10699 (the "FIREARM"). The FIREARM was loaded with one (1) live round of Blazer Luger 9mm ball-point ammunition in the chamber and three (3) live rounds of RP Luger 9mm ball-point ammunition in an ammunition magazine (the "AMMUNITION").

4. A further lawful search of DORCEUS resulted in the recovery of five (5) orange zip lock bags containing suspected cocaine base and one (1) black and clear zip lock bag containing suspected marijuana.

5. DORCEUS provided a statement and admitted that the OFFICERS found the handgun in his possession and stated that it was for protection.

6. The FIREARM and the AMMUNITION were manufactured outside the State of New Jersey and thus necessarily traveled in interstate or foreign commerce prior to September 16, 2021.

7. On or about August 12, 2014, DORCEUS was convicted in the Superior Court of New Jersey, Union County, on two separate cases, of two counts of possession with intent to distribute a controlled dangerous substance,

in violation of N.J.S.A. 2C:35-5, and was sentenced to four (4) years of incarceration.

8. On or about October 30, 2015, DORCEUS was convicted in the Superior Court of New Jersey, Union County, of unlawful possession of a weapon, a handgun, in violation of N.J.S.A. 2C:39-5, and was sentenced to five (5) years of incarceration with forty-two (42) months to be served before parole eligibility.