
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor, USMJ
	:	
v.	:	Mag. No. 22-9239
	:	
NAEEM JACKSON and	:	
WALTER WILLIAMS-LANG	:	
	:	CRIMINAL COMPLAINT

I, Michael Meawad, 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.

/s Michael Meawad

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

Sworn to before me and subscribed in my presence,
June 27, 2022 in New Jersey
Authorized telephonically pursuant to Fed. R. Crim. P. Rule 4.1

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

/s Hon. Cathy L. Waldor, USMJ

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Hobbs Act Violence in Furtherance of Planned Robbery)

On or about May 14, 2022, in Union County, in the District of New Jersey, and elsewhere, defendants,

**NAEEM JACKSON and
WALTER WILLIAMS-LANG,**

did knowingly and willfully commit and threaten physical violence to an employee of a taxi company (the “Victim”) in furtherance of a plan and purpose to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, namely, a plan and purpose to obtain taxi fares from the Victim, against his will, by means of actual and threatened force, violence and fear of injury.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT TWO

(Discharging a Firearm During and in Relation to a Crime of Violence)

On or about May 14, 2022, in Union County, in the District of New Jersey and elsewhere, the defendants,

**NAEEM JACKSON and
WALTER WILLIAMS-LANG,**

did knowingly discharge a firearm, that is, a loaded P80 semiautomatic handgun assembled with a part from Polymer80, Inc. that is labeled PF940C and other components, with no serial number and unknown manufacturer, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the Hobbs Act offense charged in Count One under Title 18, United States Code, Section 1951(a) and Section 2.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

COUNT THREE

(Conspiracy to Use Firearm During and in Relation to a Crime of Violence)

On or about May 14, 2022, in Union County, in the District of New Jersey and elsewhere, the defendants,

**NAEEM JACKSON and
WALTER WILLIAMS-LANG,**

did conspire to use a loaded firearm, that is, a P80 semiautomatic handgun assembled with a part from Polymer80, Inc. that is labeled PF940C and other components, with no serial number and unknown manufacturer, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the Hobbs Act offense charged in Count One in violation of Title 18, United States Code, Section 1951(a) and Section 2.

In violation of Title 18, United States Code, Section 924(o).

COUNT FOUR
(Possession of a Firearm by a Convicted Felon)

On or about May 14, 2022, in Union County, in the District of New Jersey and elsewhere, the defendants,

NAEEM JACKSON and
WALTER WILLIAMS-LANG,

having each been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of Essex County, New Jersey, did knowingly possess in and affecting commerce a loaded firearm, namely a P80 semiautomatic handgun assembled with a part from Polymer80, Inc. that is labeled PF940C and other components, with no serial number and unknown manufacturer.

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

ATTACHMENT B

I, Michael Meawad, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in 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 May 14, 2022, at approximately 4:30 a.m., Naeem Jackson (“JACKSON”), using his own phone, called a taxi company, located in Linden, Union County New Jersey, and ordered a taxi to the 400 block of West Grand Street in Elizabeth New Jersey. At approximately 4:37 a.m., the taxi JACKSON ordered arrived in the area shortly before JACKSON and Walter Williams-Lang (“WILLIAMS-LANG”) entered the taxi.

2. Surveillance video from the passenger compartment of the taxi captured JACKSON and WILLIAMS-LANG entering the vehicle wearing dark clothing and masks over their faces. Upon entry into the taxi, WILLIAMS-LANG pointed a firearm at the taxi driver (“Victim”) while demanding the Victim’s money from taxi fares. After WILLIAMS-LANG demanded the money, JACKSON took the firearm from WILLIAMS-LANG and pistol-whipped the Victim’s head shortly before shooting the Victim in the arm. Upon being shot, the Victim stopped the taxi and both JACKSON and WILLIAMS-LANG fled the scene but were apprehended by law enforcement following a brief foot pursuit.

3. Following his arrest, JACKSON waived his *Miranda* rights and directed law enforcement to a parking deck on or around North Avenue, Elizabeth, New Jersey where he had discarded a P80 semiautomatic handgun assembled with a part from Polymer80, Inc. labeled PF940C and other components, with no serial number and unknown manufacturer, loaded with one live 9mm caliber round of ammunition in its chamber—a privately manufactured firearm (“PMF” or “Ghost Gun”)¹—into a trash bucket while fleeing from law enforcement following the robbery. Surveillance video from the parking deck depicted JACKSON and WILLIAMS-LANG running past the trash

¹ A PMF is defined as “a firearm, including a frame or receiver, assembled or otherwise produced by a person other than a licensed manufacturer, and without a serial number or other identifying markings placed by a licensed manufacturer at the time the firearm was produced.” *Definition of “Frame or Receiver” and Identification of Firearms, Notice of Proposed Rulemaking*, 86 Fed. Reg. 27746.

bucket and apparently discarding the Ghost Gun into the trash bucket where it was later recovered.

4. The ATF has examined the Ghost Gun and determined that it was assembled with a part manufactured in Nevada by Polymer80, Inc. that is labeled PF940C and other components—and that, sometime prior to May 14, 2022, such part(s) traveled in and affected interstate commerce.

5. During his formal statement to law enforcement JACKSON waived his *Miranda* rights and admitted that he planned to rob the Victim at gunpoint and admitted that he shot the Victim.

6. Following arrest, and after being provided his *Miranda* rights, WILLIAMS-LANG also gave a formal statement to law enforcement and admitted being in the taxi with Jackson on May 14, 2022 when the Victim was shot. At that time, law enforcement observed WILLIAMS-LANG's identifiable hand tattoo and confirmed it was consistent with the one depicted in video footage from the incident.

7. On or about April 14, 2019, JACKSON was convicted in the Superior Court of New Jersey, Essex County, for conspiracy to commit robbery involving a threat or fear of bodily injury, in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:15-1, an offense punishable by a term of imprisonment of more than one year.

8. On or about June 12, 2020, WILLIAMS-LANG was convicted in the Superior Court of New Jersey, Essex County, for unlawful possession of a weapon by certain persons, in violation of N.J.S.A. 2C:39-5, an offense punishable by a term of imprisonment of more than one year.