
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Joseph A. Dickson
:
v. : Mag. No. 17-610 (JAD)
:
CARNELL JEFFERSON : **CRIMINAL COMPLAINT**

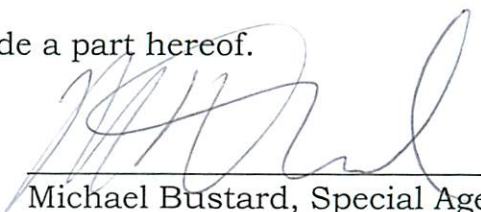
I, Michael Bustard, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Michael Bustard, Special Agent
United States Department of Justice
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and subscribed in my presence,

July 13 2017
Date

Honorable Joseph A. Dickson
United States Magistrate Judge
Name and Title of Judicial Officer

at Essex County, New Jersey
County and State



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Engage in the Business of Unlicensed Firearms Dealing)

From at least in or around October, 2014, through in or around July, 2016, in the District of New Jersey and elsewhere, the defendant,

CARNELL JEFFERSON,

did knowingly and willfully conspire and agree with others to commit an offense against the United States, that is:

Not being a licensed importer, licensed manufacturer, or licensed dealer, did engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A) and Title 18, United States Code, Section 2.

THE OBJECT OF THE CONSPIRACY

It was the object of the conspiracy that defendant, on behalf of a person prohibited from purchasing firearms, to wit, uncharged co-conspirator "T.J.", would obtain firearms in Georgia from federally licensed firearms dealers by falsely claiming on official ATF Form 4473 that he was purchasing said firearms for himself, when in truth and fact, the defendant knowingly and willfully was purchasing said firearms at the direction of "T.J.", for pecuniary gain, and intending to deliver the firearms to T.J.'s possession and control, and knowing that "T.J." would have the firearms transported to New Jersey for the purpose of selling those firearms in New Jersey.

OVERT ACTS

In furtherance of the conspiracy and to effect the illegal object thereof, the following acts, among others, were committed in the District of New Jersey and elsewhere:

1. On various dates between October, 2014 and July, 2016, as detailed in the chart below, CARNELL JEFFERSON purchased firearms from federally licensed firearms dealers in Georgia, and falsely represented on the purchasing form (ATF Form 4473) that he was the actual buyer of the firearms.
2. On each of these dates, CARNELL JEFFERSON delivered each firearm he purchased to the possession and control of co-conspirator "T.J."

with knowledge that "T.J." was illegally transporting those firearms for sale in the State of New Jersey

<u>Date of Purchase</u>	<u>Date of Recovery</u>	<u>Make</u>	<u>Model</u>	<u>Caliber</u>	<u>Serial Number</u>
10/22/2014	12/15/2014	Iberia	.40 S&W	40	004802
12/5/2014	1/19/2016	Taurus	PT140	40	SSL52623
12/5/2014	5/5/2015	Bryco Arms	Jennings Nine	9	1445381
12/10/2014	12/17/2014	Star	30MI	9	1845064
3/31/2015	11/5/2015	Taurus	PT111	9	TAW60305
3/31/2015	10/28/2015	Taurus	PT740	40	SHY67493
7/23/2015	1/17/2017	American Arms	TT9mm Tokarev	9	10413
7/8/2016	10/20/2016	Jiminez Arms	J.A. Nine	9	369898

All in violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Michael Bustard, am an agent with the U.S. Department of Justice, 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 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 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. At all times relevant to this Complaint:
 - a. Defendant CARNELL JEFFERSON and uncharged co-conspirator "T.J." were not licensed under the provisions of Chapter 44 of Title 18 of the United States Code as importers, manufacturers, or dealers of firearms.
 - b. Uncharged co-conspirator "T.J." was prohibited from purchasing firearms by reason of his prior convictions for felony offenses in the State of New Jersey.
2. On or about October 22, 2014, JEFFERSON purchased an Iberia .40 S&W .40 caliber firearm, bearing serial number 004802 (the "Iberia"), from a federally licensed firearms dealer ("hereinafter referred to as a "FFL") in Albany, Georgia. As part of that purchase, JEFFERSON completed an ATF Form 4473, which is required by law to be completed prior to a gun purchase from a FFL (hereinafter referred to as the "4473" or the "4473 form"). On the 4473 form, dated October 22, 2014, JEFFERSON falsely stated he was the actual purchaser of the firearm.
3. On or about December 5, 2014, JEFFERSON purchased multiple firearms from a FFL in Leesburg, Georgia. Among those firearms were a Taurus PT140 .40 caliber pistol, bearing serial number SSL52623, and a Bryco Arms, Jennings Nine 9mm pistol, bearing serial number 1445381. As part of that purchase, JEFFERSON completed a 4473 form, falsely stating that he was the actual purchaser of the firearms.
4. On or about December 10, 2014, JEFFERSON purchased multiple firearms from a FFL in Leesburg, Georgia. Among those firearms was a Star 30MI 9mm pistol, bearing serial number 1845064. In relation to that purchase, JEFFERSON filled out a 4473 form, falsely stating that he was the actual purchaser of the firearms.

5. On or about March 31, 2015, JEFFERSON purchased two firearms from a FFL in Albany, Georgia, a Taurus PT111 9mm pistol, bearing serial number TAW60305, and a Taurus PT740 .40 caliber pistol, bearing serial number SHY67493. In relation to that purchase, JEFFERSON filled out a 4473 form, falsely stating that he was the actual purchaser of both firearms.

6. On or about July 23, 2015, JEFFERSON purchased two firearms from a FFL in Albany, Georgia. Among the two firearms purchased was an American Arms, TT9mm Tokarev 9mm pistol, bearing serial number 10413. In relation to that purchase, JEFFERSON filled out a 4473 form, falsely stating that he was the actual purchaser of both firearms.

7. On or about July 8, 2016, JEFFERSON purchased one firearm from a FFL in Albany, Georgia, namely a Jiminez Arms, J.A. Nine 9mm pistol, bearing serial number 369898. In relation to that purchase, JEFFERSON filled out a 4473 form, falsely stating that he was the actual purchaser of the firearm.

8. JEFFERSON admitted to ATF agents that: (1) T.J. instructed JEFFERSON to purchase each of the firearms set forth above (collectively "the Firearms"); (2) T.J. provided the money to purchase the Firearms to JEFFERSON; (3) JEFFERSON was accompanied by T.J. to each of the FFLs described in Paragraphs 2 through 7 to purchase the Firearms; (4) JEFFERSON was paid approximately \$50 for each of the Firearms he purchased on behalf of "T.J."; (5) Jefferson knew that "T.J." was unable to purchase firearms legally because "T.J." had sustained felony convictions and had spent time in jail; and (6) JEFFERSON knew the Firearms that he purchased for "T.J." were being transported to New Jersey for sale, typically by "couriers" that "T.J." would pay to transport the guns from Georgia to New Jersey.

9. The Firearms purchased by JEFFERSON on behalf of "T.J." between October, 2014 and July, 2016 were all recovered in the State of New Jersey in relation to criminal activity between December 2014 and January 2017.