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

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UNITED STATES OF AMERICA : Hon. Joseph A. Dickson  
:   
v. : Mag. No. 17-6609 (JAD)  
:   
TYHEED JEFFERSON, :   
a/k/a "Solo," :   
MATHIAS CONNOR, and :   
NAKIYA GLENN :   
:   
: **CRIMINAL COMPLAINT**


I, Joseph Sente, 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.

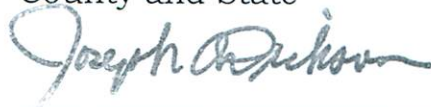
  
\_\_\_\_\_  
Joseph Sente, Special Agent  
United States Department of Justice  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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 Unlawfully Sell Firearms)

From in or around January, 2017, through in or around July, 2017, in the District of New Jersey and elsewhere, the defendants,

**TYHEED JEFFERSON,  
a/k/a "Solo,"  
MATHIAS CONNOR, and  
NAKIYA GLENN,**

did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, namely, not being a licensed importer, licensed manufacturer, licensed dealer or licensed collector of firearms, did willfully transfer, sell, trade, give, transport, and deliver firearms, as contained in the chart below, to any person, knowing, or having reasonable cause to believe, did not reside in Georgia, their state of residence, contrary to Title 18, United States Code, Section 922(a)(5), and Title 18, United States Code, Section 2.

| <b><u>Make</u></b>        | <b><u>Model</u></b> | <b><u>Caliber</u></b> | <b><u>Date of<br/>Illegal Sale</u></b> | <b><u>Serial<br/>Number</u></b> |
|---------------------------|---------------------|-----------------------|--|---------------------------------|
| Diamondback Arms Inc.     | DB9                 | 9                     | 2/7/2017                               | YE8378                          |
| Bersa                     | BP9CC               | 9                     | 2/7/2017                               | E07584                          |
| Cobra Enterprises Inc.    | C32                 | 32                    | 2/7/2017                               | 005090                          |
| Diamondback Arms Inc.     | DB380               | 380                   | 2/7/2017                               | ZE2080                          |
| Taurus International      | PT738 TCP           | 380                   | 2/7/2017                               | 60975B                          |
|                           |                     |                       |  |                                 |
| ROMARM/CUGIR              | GP WASR-10          | 7.62                  | 2/28/2017                              | 1-17847-99                      |
| MOSSBERG                  | 500                 | 12                    | 2/28/2017                              | T992186                         |
| GLOCK GMBH                | 22                  | 40                    | 2/28/2017                              | CLS759US                        |
| DPMS Inc.                 | PANTHER LR          | 308                   | 2/28/2017                              | DP06504K                        |
| Lorcin Engineering        | L380                | 380                   | 2/28/2017                              | 3122316                         |
| Taurus International      | Unknown             | 38                    | 2/28/2017                              | FK77195                         |
| Smith & Wesson            | 500                 | 500                   | 2/28/2017                              | CUC0509                         |
| Ruger                     | Rifle               | 223                   | 2/28/2017                              | 582-07047                       |
|                           |                     |                       |  |                                 |
| Trocaola, Aranzabla Y CIA | Revolver            | 38                    | 5/7/2017                               | 3149                            |
| Intratec                  | AB10                | 9                     | 5/7/2017                               | A013759                         |
| Clerke TechniCorp.        | CLERKE 1ST          | 22                    | 5/7/2017                               | 213289                          |

|                              |                 |      |           |           |
|------------------------------|-----------------|------|-----------|-----------|
| Ruger                        | MARK II         | 22   | 5/7/2017  | 219-03361 |
| Keltec, Cnc Industries, Inc. | PF-9            | 9    | 5/7/2017  | RLW13     |
| Taurus International         | PT 24/7 PRO DS  | 9    | 5/7/2017  | TCR69443  |
| Colt                         | Police Positive | 38   | 5/7/2017  | 10760     |
|                              |                 |      |           |           |
| Glock                        | 26              | 9    | 5/24/2017 | SBV843    |
| Smith & Wesson               | SD9VE           | 9    | 5/24/2017 | FWS0955   |
| Taurus                       | PT111           | 9    | 5/24/2017 | TJ020915  |
| Glock                        | 27              | 40   | 5/24/2017 | HYX144    |
| Keltec                       | PLR-16          | 5.56 | 5/24/2017 | P2H63     |
|                              |                 |      |           |           |
| SCCY Industries, LLC.        | CPX-2           | 9    | 6/4/2017  | 106484    |
| Taurus International         | 85              | 38   | 6/4/2017  | KA66973   |
| Lorcin Engineering           | L380            | 380  | 6/4/2017  | 316989    |
| Jimenez Arms                 | J.A. NINE       | 9    | 6/4/2017  | 381605    |
| Beretta USA Corp             | 92G             | 9    | 6/4/2017  | BER225431 |
| Smith & Wesson               | SW9VE           | 9    | 6/4/2017  | DTT1552   |
| Masterpiece Arms             | MPA930T         | 9    | 6/4/2017  | FX00594   |
| GLOCK GMBH                   | 23              | 40   | 6/4/2017  | RYN943    |
| Cobra                        | FS380           | 380  | 6/4/2017  | FS091358  |
| Raven Arms                   | M125            | 25   | 6/4/2017  | 1400179   |
| Springfield Armory           | XD40            | 40   | 6/4/2017  | US191296  |
| Phoenix Arms                 | HP22A           | 22   | 6/4/2017  | 4265196   |
|                              |                 |      |           |           |
| Beretta                      | PX-4 Storm      | 40   | 6/13/2017 | PY13892   |
|                              |                 |      |           |           |
| Glock                        | 19              | 9    | 7/11/17   | BDLL356   |

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

**COUNTS TWO Through FOUR**  
(Felon in Possession of a Firearm)

On or about May 7, 2017 (COUNT TWO), May 24, 2017 (COUNT THREE), and June 4, 2017 (COUNT FOUR), in the District of New Jersey and elsewhere, the defendant,

**TYHEED JEFFERSON, a/k/a “Solo,”**

having been convicted by a court of a crime punishable by imprisonment for a term exceeding one year knowingly possessed in and affecting commerce firearms, including the following:

| <b>Count</b> | <b>Date</b> | <b>Firearm</b>  |
|--------------|-------------|---|
| <b>2</b>     | 5/7/2017    | Trocaola, Aranzabla Y CIA .38 caliber revolver, serial number 3149;<br><br>Intratec AB10 9mm handgun, serial number A013759;<br><br>Clerke TechniCorp. CLERKE 1 <sup>ST</sup> .22 caliber handgun, serial number 213289;<br><br>Ruger MARK II .22 caliber handgun, serial number 219-03361;<br><br>Keltec, Cnc Industries, Inc. PF-9 9mm handgun, serial number RLW13;<br><br>Taurus International PT 24/7 PRO DS 9mm handgun, serial number TCR69443;<br><br>Colt Police Positive .38 caliber handgun, serial number 10760 |
| <b>3</b>     | 5/24/2017   | Glock 26 9mm handgun, serial number SBV843;<br>Smith & Wesson SD9VE 9mm handgun, serial number FWS0955;   |

|   |          |   |
|---|----------|---|
|   |          | <p>Taurus PT111 9mm handgun, serial number TJ020915;</p> <p>Glock 27 .40 caliber handgun, serial number HYX144</p>  |
| 4 | 6/4/2017 | <p>SCCY Industries LLC CPX-2 9mm handgun, serial number 106484;</p> <p>Taurus International 85 .38 caliber handgun, serial number KA66973;</p> <p>Lorcin Engineering L380 .380 caliber handgun, serial number 316989;</p> <p>Jimenez Arms J.A. NINE 9mm handgun, serial number 381605;</p> <p>Beretta USA Corp 92G 9mm handgun, serial number BER225431;</p> <p>Smith &amp; Wesson SW9VE 9mm handgun, serial number DTT1552;</p> <p>Masterpiece Arms MPA930T 9mm handgun, serial number FX00594;</p> <p>GLOCK GMBH 23 .40 caliber handgun, serial number RYN943;</p> <p>Cobra FS380 .380 caliber handgun, serial number FS091358;</p> <p>Raven Arms M125 .25 caliber handgun, serial number 1400179;</p> <p>Springfield Armory XD40 .40 caliber handgun, serial number US191296;</p> <p>Phoenix Arms HP22A .22 caliber handgun, serial number 4265196</p> |

In violation of 18 U.S.C. § 922(g)(1).

**COUNT FIVE**  
**(Distribution and Possession With the Intent To Distribute**  
**Methamphetamine)**

On or about May 24, 2017, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**TYHEED JEFFERON, a/k/a “Solo,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) and (b)(1)(C).

## **ATTACHMENT B**

I, Joseph Sente, 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. Defendants TYHEED JEFFERSON and MATHIAS CONNOR were residents of the State of Georgia.
- b. Defendant NAKIYA GLENN was a resident of the State of New Jersey.
- c. The Confidential Informant ("CI") who was working at the direction of the ATF was a resident of the State of New Jersey.
- d. Defendant TYHEED JEFFERSON was previously convicted of a felony offense in the state of New Jersey, an offense which is punishable by imprisonment for a term exceeding one year.
- e. Defendants JEFFERSON, CONNOR and GLENN were not licensed under the provisions of Chapter 44 of Title 18 of the United States Code as importers, manufacturers, dealers or collectors of firearms.

2. It was the object of the conspiracy that defendants TYHEED JEFFERSON and MATHIAS CONNOR, who are Georgia residents, would obtain firearms in Georgia and elsewhere, and would either transport those firearms and sell them to the CI in New Jersey, or sell them to the CI in Georgia knowing, or having reason to believe that, the CI was a resident of New Jersey and that the firearms purchased were intended to be transported to New Jersey. It was further an object of the conspiracy that NAKIYA GLENN would aid TYHEED JEFFERSON in the transport of the firearms from Georgia and the sale of those firearms to the CI in New Jersey who she knew was not a resident of Georgia.

3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendants committed and caused to be committed overt acts, among others, in the District of New Jersey and elsewhere, including,

- a. Between in or around January, 2017 through in or around July 2017, JEFFERSON and the CI had numerous telephone communications wherein JEFFERSON arranged to sell firearms to the CI.
- b. Between in or around February, 2017 through in or around July, 2017, as detailed below in Paragraphs 5, 11, 15, 22, 24, 30 and 34, JEFFERSON, CONNOR and GLENN participated in the sale of firearms to the CI.

4. On or about January 26, 2017, during a lawfully recorded telephone call between the CI and JEFFERSON, the CI arranged to purchase approximately seven firearms in exchange for \$2,500 from JEFFERSON on or about February 7, 2017. The CI, located in New Jersey, agreed to come to Albany, Georgia to pay for and take possession of the firearms from JEFFERSON.

5. On February 7, 2017, during an audio and video-taped meeting at a location in Albany, Georgia, JEFFERSON sold the CI the following five firearms over the course of two separate transactions conducted on the same day in exchange for \$1,250 in United States currency:

- a. Diamondback Arms Inc. Model DB9 9-millimeter semiautomatic handgun loaded with five rounds<sup>1</sup>;
- b. Bersa, Model BP9CC 9-millimeter semiautomatic handgun;
- c. Cobra Enterprises Inc., Model C32 .32 caliber revolver;
- d. Diamondback Arms Inc. Model DB380 .380 caliber semiautomatic handgun loaded with six rounds; and
- e. Taurus International Model PT738, .380 caliber semiautomatic handgun.

6. On February 17, 2017, during a lawfully recorded telephone conversation, JEFFERSON told the CI that his "cousin," subsequently identified as MATHIAS CONNOR, would be picking up the firearms for JEFFERSON for the next transaction, which eventually was scheduled for February 28, 2017.

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<sup>1</sup> Serial numbers for all guns are listed in the chart under Count One, Attachment A, and are incorporated by reference.



7. On February 27, 2017, during a lawfully recorded telephone conversation, JEFFERSON told the CI that CONNOR was able to buy three "drums," a term referring to high capacity magazines, and that two of these "drums" would be included in the gun purchase the next day. JEFFERSON also stated that once CONNOR got out of work, JEFFERSON would meet CONNOR to pick up the firearms.

8. The next day, on February 28, 2017, over the course of several lawfully recorded telephone conversations, JEFFERSON told the CI that CONNOR would be driving JEFFERSON to the gun sale location, namely a parking lot near a mall in Atlanta, Georgia, that JEFFERSON and CONNOR were leaving soon, and that CONNOR had stored the guns at CONNOR's residence prior to the gun sale.

9. Law enforcement officers were conducting physical surveillance of the February 28, 2017 gun sale, during which JEFFERSON arrived in a vehicle ("Vehicle-1") driven and registered to CONNOR.<sup>2</sup> Both JEFFERSON and CONNOR exited Vehicle-1, and after greeting the CI, accompanied the CI to the rear of Vehicle-1 where a large Reebok bag was located. In CONNOR's presence, JEFFERSON asked the CI to remove the bag and carry it to the CI's vehicle ("Vehicle-2"), which had New Jersey license plates. After the CI removed the bag from Vehicle-1 and carried the bag to Vehicle 2, JEFFERSON started to explain the different types of guns and accessories that were contained in the Reebok bag, all in CONNOR's presence.

10. Once the CI confirmed the number of guns and the accessories, the CI handed \$8,000 to JEFFERSON. JEFFERSON then told the CI that JEFFERSON would have additional firearms for sale and verbally confirmed with CONNOR that the source of supply of the firearms had additional guns for sale. CONNOR then explained to JEFFERSON and the CI that he (CONNOR) would be attending the "G-Show" (Gun Show) the next weekend and would have more firearms for sale after the show. Once again in CONNOR's presence, the CI asked JEFFERSON if he would travel to New Jersey for additional firearms transactions and to meet with the CI's gun buyer. JEFFERSON told the CI that it was still to "hot" to travel with firearms to New Jersey, meaning that there was a likelihood that law enforcement in New Jersey would detect the gun trafficking in New Jersey, and it was safer to conduct the gun sales in Georgia.

11. During the February 28, 2017 transaction, which was audio-

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<sup>2</sup> After the transaction, the CI and ATF agents positively identified CONNOR from a photograph as the person who accompanied JEFFERSON to the transaction and was referred to as JEFFERSON's "cousin."

taped<sup>3</sup>, JEFFERSON sold the CI the following eight firearms in exchange for \$8,000:

- a. Romarm/Cugir Model GP WASR-10 7.62 caliber rifle with a 75-round drum;
- b. Mossberg Model 500 12-gauge shotgun;
- c. Glock Model 22 .40 caliber semiautomatic pistol;
- d. DPMS Inc. Model panther LR-308 .308 caliber rifle;
- e. Lorcin Model L380 .380 caliber semiautomatic handgun;
- f. Taurus (unknown model) .38 caliber revolver;
- g. Smith & Wesson Model 500 .500 caliber revolver;
- h. Sturm Ruger Model Ranch Rifle .223 caliber rifle;
- i. Sixteen rounds of 5.56 caliber ammunition; and
- j. Sixteen rounds of .500 caliber ammunition.

12. In recorded conversations that occurred at the direction of law enforcement in March 2017, JEFFERSON discussed a firearms sale whereby JEFFERSON would ship approximately seven to ten firearms through the mail to the CI in New Jersey. JEFFERSON told the CI that one of JEFFERSON's associates in New Jersey would receive the package of firearms and contact the CI to arrange delivery. JEFFERSON agreed that the CI could wire money to him as payment for the firearms.

13. On or about April 24, 2017, during a lawfully recorded telephone conversation, JEFFERSON continued to discuss a firearms sale whereby he would either transport or ship approximately seven to ten firearms to New Jersey. Furthermore, JEFFERSON sent the CI a picture via text message of the firearms for sale. The photograph contained what appeared to be approximately ten firearms and a high capacity magazine.

14. Between April 24, 2017 and May 7, 2017, in a series of phone communications between the CI and JEFFERSON, JEFFERSON agreed to come to New Jersey to conduct the next firearms sale.

15. On May 7, 2017, during an audio and video-taped meeting at a

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<sup>3</sup> While the CI also was equipped with a video-recording device, it malfunctioned.

location in Newark, New Jersey, JEFFERSON sold the CI the following firearms in exchange for \$2,500 in United States currency:

- a. Keltec Model PF-9 9-millimeter semiautomatic handgun, loaded with seven rounds of ammunition;
- b. Intratec Arms Model AB-10 9-millimeter semiautomatic handgun with an extended magazine, loaded with thirty-three rounds of ammunition;
- c. Ruger Model Mark II .22 caliber semiautomatic handgun, loaded with eight rounds of ammunition;
- d. Taurus International Model PT24/7 Pro DS 9-millimeter semiautomatic handgun;
- e. Colt Model Police Positive .38 caliber revolver;
- f. Clerke Technicorp Model Clerke 1<sup>st</sup> .22 caliber revolver;
- g. Trocaola Aranzabal Y CIA .38 caliber revolver; and
- h. Fifteen rounds of 9-millimeter ammunition.

16. During the May 7, 2017 gun sale, JEFFERSON told the CI that JEFFERSON could supply the CI with “Ecstasy” pills and provided three “sample” pills of Ecstasy<sup>4</sup> to the CI.

17. On May 15, 2017 and again on May 23, 2017, the CI and JEFFERSON had several lawfully recorded telephone conversations wherein they discussed and arranged for the CI to purchase MDMA pills and various firearms (including an AR-15 rifle, a Glock handgun, and a Keltec handgun) from JEFFERSON.

18. On May 20, 2017, the CI spoke with JEFFERSON during a lawfully recorded telephone call about JEFFERSON’s inability to complete the aforementioned transaction. JEFFERSON informed the CI that he could not find a bag that was capable of fitting the “R” (AR-15) type firearm even though he attempted to break it down into separate pieces in an effort to transport the firearm to New Jersey. JEFFERSON stated that he would not be able to transport

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<sup>4</sup> Based on my training and experience, “ecstasy” is the commonly used term for MDMA, or Methylenedioxymethamphetamine, a Schedule I controlled substance. As described below, the pills that subsequently were sold to the CI on May 24, 2017 were analyzed, and those pills actually contained another controlled substance, methamphetamine, a Schedule II controlled substance.

this firearm to New Jersey to sell it to the CI but JEFFERSON still could sell the other firearms to the CI. In response to the CI's inquiry, JEFFERSON confirmed that the "Glizzy" (Glock) had a one hundred-round magazine. JEFFERSON assured the CI that JEFFERSON was attempting to make his way to the CI in New Jersey to complete the transaction, and if necessary, JEFFERSON would pay \$200 to a female associate to drive him to New Jersey to conduct the gun sale.

19. On May 21, 2017, during a lawfully recorded conversation, JEFFERSON confirmed that he would be transporting the handguns to New Jersey. JEFFERSON then explained to the CI that he (JEFFERSON) would be purchasing 13,000 MDMA pills and therefore would be able to supply the CI with anything the CI needed.

20. On May 24, 2017, during a lawfully recorded conversation, JEFFERSON told the CI that he was in New Jersey and that he wanted to complete the previously agreed upon firearms and narcotics transaction that night.

21. Later on May 24, 2017, the CI spoke to JEFFERSON. During the course of several lawfully recorded conversations, JEFFERSON explained that he was trying to put a photograph together of the firearms to send to the CI. JEFFERSON then went over the cost of the firearms and narcotics that he would be selling to the CI, explaining that it would cost the CI \$5,000 for "The Situations" (firearms). JEFFERSON then explained to the CI that the "handjobs" (handguns) were brand new, and that he would sell to the CI two "Glizzy" (Glock handguns), a "Kel" (Keltec handgun), and two additional handguns for of the agreed-upon sale price of \$5,000. JEFFERSON also told the CI that the firearms would come with high capacity magazines. JEFFERSON also stated that he was able to sell 1,500 "Skittles"<sup>5</sup> to the CI at a cost of \$2.00 per pill, for a total of \$3,000. JEFFERSON advised the CI that he needed to complete the firearms and narcotics sale prior to leaving for the airport that evening. JEFFERSON explained that he did not have a vehicle and that he would meet the CI at a location in Newark (the "Newark Location"). JEFFERSON and the CI agreed to meet at the Newark Location within the hour to complete the transaction.

22. Later in the day of May 24, 2017, during an audio recorded meeting<sup>6</sup> at the Newark Location, JEFFERSON sold the CI the following for \$7,950 in United States currency:

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<sup>5</sup> Based on my training and experience and the investigation to date, the term "Skittles" is street slang for MDMA.

<sup>6</sup> There is a video recording of part of the transaction, which was captured by the surveillance system of a nearby gas station.

- a. approximately 1,500 “MDMA” pills<sup>7</sup>;
- b. Keltec Model PLR-16 5.56-millimeter semiautomatic handgun;
- c. A one-hundred-round magazine for the Keltec set forth in paragraph 22(b);
- d. Taurus PT111 G2 9-millimeter semiautomatic handgun, loaded with twelve rounds of ammunition;
- e. Glock Model 27 .40 caliber semiautomatic handgun, loaded with six rounds of ammunition;
- f. A fifty-round drum magazine for the Glock set forth in paragraph 22(e);
- g. Glock Model 26 9-millimeter semiautomatic handgun, loaded with one round of ammunition;
- h. A fifty-round drum magazine for the Glock set forth in paragraph 22(g);
- i. Smith & Wesson Model SD9VE 9-millimeter semiautomatic handgun with defaced serial number, loaded with twelve rounds of ammunition; and
- j. A thirty-round magazine for the Smith & Wesson set forth in paragraph 22(i).

23. Later on May 30, 2017, during a lawfully recorded telephone conversation, JEFFERSON asked the CI how many additional “Flintstones” (MDMA) pills the CI wanted to purchase. JEFFERSON and the CI also discussed a future firearms transaction and then agreed that JEFFERSON would contact the CI when JEFFERSON had additional firearms and narcotics to sell to the CI.

24. On June 4, 2017, during an audio and video-taped meeting at a location in Irvington, New Jersey, JEFFERSON sold the CI the following:

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<sup>7</sup> The MDMA pills were analyzed by the Drug Enforcement Administration Laboratory and were determined to contain methamphetamine, a Schedule II controlled substance, not MDMA. According to a DEA lab analyst, pills marketed as “MDMA” or “Ecstasy” often contain controlled substances other than MDMA, such as methamphetamine.

- a. Taurus International .38 Special revolver;
- b. Lorcin Model L380 .380 caliber semiautomatic handgun;
- c. Cobra Model FS-380 .380 caliber semiautomatic handgun;
- d. Raven Arms Inc. Model MP-25 .25 caliber semiautomatic handgun;
- e. Masterpiece Arms Model MPA Defender 9-millimeter semiautomatic handgun;
- f. SCCY Model CPX-2 9-millimeter semiautomatic handgun;
- g. Smith & Wesson Model SW9VE 9-millimeter semiautomatic handgun;
- h. Beretta Model 92 Brigadier 9-millimeter semiautomatic handgun;
- i. Springfield Armory Model XP-40 .40 caliber semiautomatic handgun;
- j. Glock Model 23 .40 caliber semiautomatic handgun;
- k. Jimenez Arms Inc. Model J.A. Nine 9-millimeter semiautomatic handgun; and
- l. Phoenix Arms Model HP22A .22 caliber semiautomatic handgun, loaded with ten rounds of ammunition.

25. The location in Irvington where the transaction took place was in front of the residence of an individual, who JEFFERSON referred to as his "niece," who subsequently was identified as defendant GLENN.

26. On June 8, 2017, during a lawfully recorded conversation, JEFFERSON and the CI discussed another gun transaction. JEFFERSON told the CI that the next transaction would be handled by GLENN. JEFFERSON explained to the CI that he had been involved in trafficking guns for six years and that he used three women to transport the firearms, including GLENN, who he described as "straight blue," a term used to describe her affiliation with the Crips street gang.

27. On June 11, 2017, during a lawfully recorded telephone conversation, JEFFERSON told the CI that he had one gun and 900 ecstasy pills available for sale and that GLENN would be handling the transaction.

JEFFERSON again assured the CI that GLENN could be trusted because she was a member of the Crips and that she lived the “gangster lifestyle.” JEFFERSON also described how GLENN traveled to Georgia on her days off from work, and drove JEFFERSON, equipped with firearms, from Georgia to New Jersey so JEFFERSON could sell the firearms in New Jersey.

28. On June 12, 2017, during a lawfully recorded telephone call, JEFFERSON told the CI that GLENN could meet the CI to do the deal immediately. The CI told JEFFERSON that he could not conduct the transaction until the following day.

29. Shortly thereafter, JEFFERSON texted a telephone number for GLENN to the CI and identified the user of the telephone number as “Kaya.” The phone number given to the CI by JEFFERSON is registered to defendant GLENN at the address in Irvington where the June 4, 2017 gun transaction took place.

30. Following a lawfully recorded telephone conversation confirming the gun sale earlier that same day, on June 13, 2017, GLENN and the CI met outside GLENN’s residence in Irvington. GLENN entered the CI’s vehicle and handed the CI a yellow bag which contained one firearm and 900 pills. The CI gave GLENN \$2,350. GLENN then counted the money and GLENN told the CI that the CI should contact her for future transactions. The following was recovered from the yellow bag:

- a. 900 pills of MDMA;<sup>8</sup>
- b. Beretta Model PX4-Storm .40 caliber semiautomatic pistol; and
- c. Ten rounds of .40 caliber ammunition.

31. During a lawfully recorded telephone conversation on July 6, 2017, GLENN agreed to drive the CI to Georgia and back to New Jersey to facilitate the CI’s purchase of additional firearms from JEFFERSON.

32. On July 9, 2017, the CI spoke to JEFFERSON during a lawfully recorded telephone conversation in which JEFFERSON explained that JEFFERSON had one gun ready for sale at GLENN’s residence in Irvington, which JEFFERSON had left with GLENN after visiting New Jersey from Georgia a few days earlier. JEFFERSON stated he had a “shot Glizzy,” a term to identify a Glock brand firearm, which JEFFERSON would sell to the CI at a purchase price of \$1,000.

33. On July 10, 2017, the CI spoke to GLENN during a lawfully recorded

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<sup>8</sup> The pills purported to contain MDMA were analyzed by the DEA laboratory and found not to contain any controlled substance.

telephone conversation in which the CI told GLENN that the CI was going to buy the “shot Glizzy” from JEFFERSON. GLENN confirmed that the CI could come by the next day to complete the transaction.

34. On July 11, 2017, the CI met GLENN outside GLENN’s residence in Irvington. GLENN was carrying a pink shoebox, which she gave to the CI in exchange for \$1,000. The following was recovered from the pink shoebox:

- a. Glock Model 19 9-millimeter semiautomatic handgun; and
- b. A 33-round magazine for the Glock 9-millimeter gun in paragraph 34a.