

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
District of New Jersey

United States of America

v.

ROSSELYN M. DEJESUS

a/k/a "Mo"

a/k/a "Monique"

Defendant(s)

Case No. 14- 2013 (JS)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/30/12 - 7/19/12 in the county of Camden in the  
District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 371

From in or about June 30, 2012, through on or about July 19, 2012, in Camden County, in the District of New Jersey, and elsewhere, Rosselyn DeJesus did knowingly and intentionally conspire and agree with others to engage in the business of dealing in firearms, while not being a federally licensed dealer, importer, or manufacturer of firearms, contrary to 18 U.S.C. § 922(a)(1)(A), in violation of 18 U.S.C. § 371 also described in Attachment A

This criminal complaint is based on these facts:

See Attachment B

☒ Continued on the attached sheet.



Complainant's signature

Patrick Finegan, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/25/2014



Judge's signature

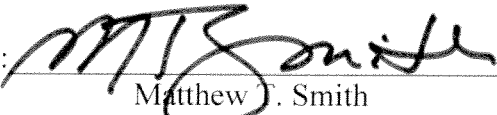
City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By:   
Matthew T. Smith  
Assistant U.S. Attorney

Date: March 25, 2014

**ATTACHMENT A**

From in or about June 30, 2012, through on or about July 19, 2012, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

ROSSELYN M. DEJESUS

a/k/a "Mo,"

a/k/a "Monique,"

did knowingly and intentionally conspire and agree with others to engage in the business of dealing in firearms, while not being a federally licensed dealer, importer, or manufacturer of firearms, contrary to Title 18, United States Code, Section 922(a)(1)(A).

In violation of Title 18, United States Code, Section 371.

**ATTACHMENT B**

**AFFIDAVIT**

I, Patrick Finegan (the "affiant"), state that I am a Special Agent with Bureau of Alcohol, Tobacco, Firearms, and Explosives (hereinafter, "ATF"). I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation, including a review of documents obtained during the investigation, as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support issuance of a complaint, I have not necessarily included each and every fact known by the government concerning this investigation. In addition, all of the conversations included in this affidavit are a summary of the conversation and not a verbatim account of the conversation.

1. I have been employed as a Special Agent with ATF since 2005, and I am currently assigned to the ATF Camden Resident Office, Newark Division where I investigate, gather evidence and make arrests for violations of Title 21 and Title 18 of the United States Code and other federal criminal laws. I have participated in and received training as an ATF Special Agent in conducting investigations into violations of the federal gun laws. Through the course of my career, I have participated in well over 100 gun and gun-trafficking investigations utilizing investigative techniques such as interviewing witnesses, conducting physical surveillance, electronic surveillance in the form of wire taps, the use of confidential informants and sources of information, and conducting and participating in searches based on search warrants.

2. In or about June 2012, an ATF confidential source of information (hereinafter, "CS") told law enforcement officers that he knew an individual named "B" or "Beav" who sold CS personal quantities of marijuana.<sup>1</sup> "B" or "Beav" was identified by law enforcement officers as Ammie Steward. CS relayed that, in conversations with Steward, Steward offered to sell CS firearms. Steward told CS that Steward had a source for firearms in both the Commonwealths of Pennsylvania and Virginia. In addition, Steward claimed that he personally removed the serial numbers on firearms and resold the firearms for profit to individuals in the Camden, New Jersey area.

3. Beginning in or about July 2012 and continuing through August 15, 2012, CS, working at the direction of law enforcement officers, purchased sixteen (16) firearms from Steward. Of the sixteen firearms purchased, 13 were either completely or partially defaced with the serial number of the firearm obliterated. The first two guns, however, which were purchased by CS from Steward on July 8, 2012, were not defaced and contained serial numbers. ATF agents learned that these two firearms -- a Kel Tec P11 9 millimeter handgun bearing serial

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<sup>1</sup> CS is a prior convicted felon with pending felony controlled dangerous substance charges being prosecuted by the State of New Jersey. CS, however, has cooperated with law enforcement in the past and has proved reliable. Information provided by CS with respect to this investigation has also proved reliable.

number AGS46 and a Kel Tec PF-9 9 millimeter handgun bearing serial number S9M59 -- were both purchased a few days earlier on July 3, 2012 in Philadelphia gun shops by the defendant, Rosselyn M. DeJesus.

4. The short time from DeJesus' purchase until the guns were illegally resold ("time to crime") indicated to ATF agents that DeJesus may have been a straw purchaser. ATF looked for DeJesus for several months and located her in or about July 2013. After approaching her, in a post-Miranda statement, DeJesus admitted to buying the two Kel-Tec handguns that were sold to the CS from Steward. DeJesus told investigators that she purchased the two firearms for a man identified in this affidavit as Co-conspirator 1. In short, DeJesus told agents that:

- (a) Co-conspirator 1 provided DeJesus with the money to buy the guns and told her exactly which guns to purchase;
- (b) DeJesus purchased several guns for Co-conspirator 1 in the Summer of 2012;
- (c) Co-conspirator 1 resold the guns, often on the same day. DeJesus observed one such sale from Co-conspirator 1 to a large African American male who drove to Philadelphia in a car with New Jersey license plates ("Co-conspirator 2"); and
- (d) Co-conspirator 1 paid DeJesus between \$50 and \$600 for purchasing the guns; and

After being shown pictures of firearms by law enforcement agents, DeJesus recognized pictures of, and admitted to buying two Kel-Tec 9 millimeter handguns.

5. ATF's investigation revealed that, in addition to the two Kel-Tec firearms being present in New Jersey, one of the other three guns purchased by DeJesus and sold by Co-conspirator 1 was recovered at a crime scene in Camden. Specifically, Camden Police recovered a weapon (the Kahr Model CW-9, 9 millimeter handgun bearing serial number EH2045) thrown by a suspect after a car stop at the corner of Louis Street and Jackson Street in Camden on May 26, 2013.

6. Co-conspirator 1 was approached by law enforcement in 2013. During an interview with Co-conspirator 1 and his counsel, Co-conspirator 1 provided a detailed account of meeting DeJesus, asking her to serve as a straw purchaser for firearms, giving her money to buy guns at Philadelphia gun shows, and reselling the guns to Co-conspirator 2 (often on the same day that they were purchased by DeJesus). Earlier this year, Co-conspirator 1 pleaded guilty and agreed to cooperate with law enforcement.

7. In furtherance of the conspiracy and to effect its unlawful object, the investigation revealed that the following overt acts were committed in the District of New Jersey and elsewhere:

(a) On or about following dates and at the following federally-licensed dealers and gun shops, defendant Rosselyn M. DeJesus purchased the following handguns:

<u>DATE</u>	<u>GUN</u>	<u>GUN SHOP</u>
June 30, 2012	Glock Model 27, .40 caliber handgun bearing serial number RUB545	Frank's Gun Shop & Shooting Range
July 3, 2012	Kel-Tec Model PF-9, 9 millimeter handgun bearing serial number S9M59	Delia's Gun Shop
July 3, 2012	Kel-Tec Model P-11, 9 millimeter handgun bearing serial number AGS46	Frank's Gun Shop & Shooting Range
July 18, 2012	Kahr Model CW-9, 9 millimeter handgun bearing serial number EH2045	Frank's Gun Shop & Shooting Range
July 19, 2012	Glock Model 27, .40 caliber handgun bearing serial number PNR076	Delia's Gun Shop

(b) After purchasing the five handguns on the dates listed above in Philadelphia, Pennsylvania, defendant Rosselyn M. DeJesus transferred those firearms to Co-Conspirator 1, who in turn resold the firearms to Co-Conspirator 2 (often on the same day defendant Rosselyn M. DeJesus purchased the firearms), who transported the firearms into the State of New Jersey.

8. The investigation has revealed that defendant Rosselyn M. DeJesus is not (and between June 30, 2012 and July 19, 2012, was not) a federally licensed dealer, licensed importer, or licensed manufacturer of firearms.

9. Based on the above information, there is probable cause to believe that defendant Rosselyn M. DeJesus did knowingly and intentionally conspire and agree with others to engage in the business of dealing in firearms, while not being a federally licensed dealer, importer, or manufacturer of firearms, contrary to Title 18, United States Code, Section 922(a)(1)(A), in violation of Title 18, United States Code, Section 371.