

2013R001142/MTS

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

UNITED STATES OF AMERICA

v.

ROSSELYN M. DEJESUS
a/k/a "Mo"

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Criminal No. 14 – 270-01 (RMB)

18 U.S.C. § 371

I N F O R M A T I O N

The defendant having waived in open Court prosecution by Indictment, the
United States Attorney for the District of New Jersey charges:

DEFENDANT AND CO-CONSPIRATORS

1. At all times relevant to this Information:

- a. Defendant ROSSELYN M. DEJESUS was a resident of Philadelphia, Pennsylvania and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.
- b. Co-Conspirator 1 was a resident of Philadelphia, Pennsylvania and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.
- c. Co-Conspirator 2 was a resident of Camden, New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.
- d. Ammie Steward, who is named as a co-conspirator but not as a defendant herein, was a resident of Pennsauken, New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

2. At all times relevant to this Information, under the laws of the Commonwealth of Pennsylvania, a Pennsylvania resident could purchase a firearm, including a handgun, by presenting proof of residency to a licensed firearms dealer.

THE CONSPIRACY

3. 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, defendant

ROSSELYN M. DEJESUS
a/k/a "Mo"

did knowingly and intentionally conspire and agree with Co-Conspirator 1, Co-Conspirator 2, co-conspirator Ammie Steward, and 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).

OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy to obtain firearms from Philadelphia-area federally-licensed firearms dealers and gun shops and resell the firearms for a profit in Pennsylvania and New Jersey.

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that, on behalf of, and after a request from, Co-Conspirator 1, defendant ROSSELYN M. DEJESUS purchased firearms from federally-licensed firearms dealers and gun shops in Philadelphia, Pennsylvania. To purchase the firearms,

defendant ROSSELYN M. DEJESUS used her own name, presented her Pennsylvania Identification Card, and signed an ATF Form 4473 (“Firearms Transaction Record Part I – Over the Counter”) in which she falsely indicated that she was the “actual transferee/buyer” of the firearms and not “acquiring the firearm[] on behalf of another person.”

6. It was further part of the conspiracy that defendant ROSSELYN M. DEJESUS purchased these firearms with funds provided to her by Co-Conspirator 1. In fact, defendant ROSSELYN M. DEJESUS purchased the specific make and model firearms that Co-Conspirator 1 had requested that she purchase for him.

7. It was further part of the conspiracy that defendant ROSSELYN M. DEJESUS, after she purchased the firearms on behalf of Co-conspirator 1, gave the firearms to Co-Conspirator 1 who in turn sold the firearms to others, including Co-Conspirator 2. In fact, Co-Conspirator 1 sometimes resold a firearm to Co-Conspirator 2 on the same day that defendant ROSSELYN M. DEJESUS had purchased the firearm from a federally-licensed firearms dealer or gun shop. After purchasing the firearms, Co-Conspirator 2 transported the firearms to the Camden, New Jersey area.

8. It was further part of the conspiracy that, in order to avoid detection as the actual purchaser of the firearms, Co-Conspirator 1 drove himself and the defendant ROSSELYN M. DEJESUS to the gun shops in a rental car where defendant ROSSELYN M. DEJESUS purchased the firearms. Rather than entering the gun shop with defendant ROSSELYN M. DEJESUS, Co-Conspirator 1 remained in the rental car – often parked around the corner from the gun shop – while defendant ROSSELYN M. DEJESUS entered the gun shop and purchased

the firearm. Co-Conspirator 1 took these actions in order to avoid having his image captured on the gun shops' security cameras.

9. It was further part of the conspiracy that, at the direction of Co-Conspirator 1 and with funds provided by him, defendant ROSSELYN M. DEJESUS purchased the following firearms in Philadelphia-area gun shops:

1. a Glock Model 27, .40 caliber handgun bearing serial number RUB545 (purchased on or about June 30, 2012);
2. a Kel-Tec Model PF-9, 9 millimeter handgun bearing serial number S9M59 (purchased on or about July 3, 2012);
3. a Kel-Tec Model P-11, 9 millimeter handgun bearing serial number AGS46 (purchased on or about July 3, 2012);
4. a Kahr Model CW-9, 9 millimeter handgun bearing serial number EH2045 (purchased on or about July 18, 2012); and
5. a Glock Model 27, .40 caliber handgun bearing serial number PNR076 (purchased on or about July 19, 2012).

10. It was further part of the conspiracy that once defendant ROSSELYN M. DEJESUS transferred the firearms to Co-Conspirator 1, Co-Conspirator 1 and Co-Conspirator 2 arranged for the firearms to be resold and delivered to other co-conspirators, including co-conspirator Ammie Steward, in New Jersey and elsewhere.

11. It was further part of the conspiracy that defendant ROSSELYN M. DEJESUS and Co-Conspirator 1 and others divided the profits made from the resale of these firearms, which represented a portion of the proceeds of the conspiracy.

OVERT ACTS

12. In furtherance of the conspiracy and to effect its unlawful object, 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

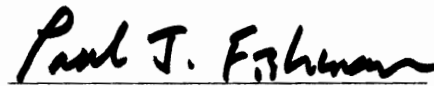
b. After purchasing the five handguns on the dates listed above in Philadelphia, Pennsylvania, defendant ROSSELYN M. DEJESUS transferred those firearms to

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.

c. Between in or about July 3, 2012 and July 8, 2012, Co-Conspirator 2 resold two of the firearms (the Kel-Tec Model PF-9, 9 millimeter handgun bearing serial number S9M59 and the Kel-Tec Model P-11, 9 millimeter handgun bearing serial number AGS46) to co-conspirator Ammie Steward in Camden, New Jersey.

d. On or about July 8, 2012, co-conspirator Ammie Steward resold two of the firearms (the Kel-Tec Model PF-9, 9 millimeter handgun bearing serial number S9M59 and the Kel-Tec Model P-11, 9 millimeter handgun bearing serial number AGS46) to a confidential informant working with law enforcement in Pennsauken, New Jersey.

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

A handwritten signature in black ink, reading "Paul J. Fishman". The signature is written in a cursive, flowing style with a prominent initial "P".

PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

Title 18 United States Code
Section 371

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