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

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Honorable Michael A. Hammer
	:	
RABINE ARMOUR,	:	
KEVIN BURTON,	:	Mag. No. 21-10198
KEVIN JACKSON,	:	
THOMAS RODGERS,	:	
JAMES HURT,	:	
SHERMAN GLASCO,	:	
RANDI BARR,	:	
TERRANCE BLACK, and	:	
KEESHA DAVIS	:	

I, Jimena Noonan, 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 Federal Bureau of Investigation, and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

krt/s/Jimena Noonan

Jimena Noonan
Special Agent - FBI

Sworn to before me and subscribed in my presence,
May 19, 2021 at Newark, New Jersey

THE HONORABLE MICHAEL A. HAMMER,
UNITED STATES MAGISTRATE JUDGE

krt/s/Michael A. Hammer

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Interstate Transportation of Stolen Property)

From on or about December 2, 2016 to on or about March 20, 2019, in the District of New Jersey and elsewhere, the defendants,

**RABINE ARMOUR,
KEVIN BURTON,
KEVIN JACKSON,
JAMES HURT,
THOMAS RODGERS,
SHERMAN GLASCO,
RANDI BARR, and
TERRANCE BLACK**

did knowingly and intentionally conspire and agree with each other and others to transport in interstate or foreign commerce goods, wares, merchandise, securities or money, of the value of \$5,000 or more, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2314.

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

COUNT TWO

(Possession of a Firearm by a Convicted Felon)

On or about March 14, 2019, in the District of New Jersey, and elsewhere, the defendant,

KEVIN BURTON,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Courts of New Jersey, did knowingly possess in and affecting commerce firearms, namely a Kahr Arms Model K40 .40 caliber semi-automatic handgun, bearing serial number DLO355, loaded with six (6) rounds of .40 caliber ammunition, and a Beretta Model 92FS .9mm semi-automatic handgun, bearing serial number BER164834.

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

COUNT THREE
(Conspiracy to Tamper with Documents or Proceedings)

From on or about March 6, 2019, through on or about March 14, 2019, in the District of New Jersey, and elsewhere, the defendants,

KEVIN BURTON and
KEESHA DAVIS,

did knowingly and intentionally conspire and agree with each other to corruptly conceal two firearms, specifically a Kahr Arms Model K40 .40 caliber semi-automatic handgun, bearing serial number DLO355, loaded with six (6) rounds of .40 caliber ammunition, and a Beretta Model 92FS .9mm semi-automatic handgun, bearing serial number BER164834, with the intent to impair its integrity and availability for use in an official proceeding, contrary to Title 18, United States Code, Section 1512(c)(1).

In violation of Title 18, United States Code, Section 1512(k).

ATTACHMENT B

I, Jimena Noonan, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers and witnesses, 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.

Background

1. Law enforcement has been investigating a criminal organization engaged in residential burglaries of Asian business owners in New Jersey, Pennsylvania, Delaware, and elsewhere. During the course of this investigation, law enforcement has relied upon traditional and electronic surveillance, and has interrupted burglaries in progress, resulting in the arrests of Rabine Armour (“Armour”), Kevin Burton (“Burton”), Kevin Jackson (“Jackson”), and Randi Barr (“Barr”), in addition to the identification of James Hurt (“J. Hurt”), Thomas Rodgers (“Rodgers”), Sherman Glasco (“Glasco”), and Terrance Black (“Black”) (collectively, the “defendants”), as members of the criminal organization. During the course of this investigation, law enforcement has determined that the criminal organization, and, in particular, the defendants, have committed more than fifty (50) residential burglaries in New Jersey, New York, Pennsylvania, and Delaware between on or about December 2, 2016, through on or about March 20, 2019.

OBJECT OF THE CONSPIRACY

2. The Defendants engaged in a conspiracy, wherein the object was to conduct home-burglaries in New Jersey, New York, Pennsylvania, and Delaware, of residences of Asian individuals, especially Asian-business owners, who were believed to have large sums of currency and valuable jewelry in their possession. Defendants further conspired to conduct these home burglaries, and to transport these criminally obtained proceeds back to their respective residences in New Jersey and Pennsylvania.

MANNER AND MEANS OF THE CONSPIRACY

3. Through investigation, law enforcement learned that it was part of the conspiracy that Defendants would identify and surveil victims at the victims’ respective businesses, typically Asian-family owned restaurants. Additionally, the Defendants would perform recognizance on residences in heavily populated Asian

communities by looking for indicia of occupancy by those of Asian-descent at the homes.

4. It was further part of the conspiracy that after learning the patterns of the victims, the Defendants would conduct residential burglaries while the victims were likely not present within the homes. Defendants typically communicated amongst themselves via two-way radios and used ladders to make entry into unsecured second-floor windows, during these coordinated events.

5. It was further a part of the conspiracy that once unlawful entry was made into the victim-homes, the Defendants would ransack these residences, typically stealing fungible items such as large amounts of United States and foreign currency, as well as jewelry and other valuables.

6. It was further a part of the conspiracy that upon the completion of a burglary, the Defendants would split up the proceeds and return to their respective residences in New Jersey and Pennsylvania with the stolen property.

OVERT ACTS

7. In furtherance of the conspiracy and to effect its unlawful object, Defendants committed overt acts, including, but not limited to the residential burglaries detailed below, in the District of New Jersey, and elsewhere.

Identification of the Criminal Organization's Operation in Elizabeth, New Jersey

8. On or about May 26, 2018, law enforcement responded to a residence in Newark, Delaware ("Home-1") due to a report of a burglary that occurred in the recent past. Upon their arrival, law enforcement met with Home-1's owner ("Victim-1"), who owns and operates a restaurant. Victim-1 reported that upon his/her arrival to Home-1, Victim-1 observed that Home-1 had been ransacked and the window to the master bathroom was wide-open and missing a screen. Victim-1 reported that approximately \$1,500 in United States currency and laptop were stolen. Victim-1 subsequently provided law enforcement with a cellular telephone ("Phone-1") recovered from within Home-1 that did not belong to any of the residents of Home-1, presumably inadvertently dropped by a perpetrator of this burglary.

9. A subsequent lawful search of Phone-1 yielded a cellular telephone number ending in x9712. A review of historical call detail records for x9712 indicated that Phone-1 was near the vicinity of Home-1 on or about May 23, 2018 – just three days before Home-1 was burglarized. Thereafter, the records indicate that Phone-1 traveled to and was near the vicinity of a residence in Elizabeth, New Jersey (the "Elizabeth Residence") on or about May 24, 2018 during morning hours, afternoon hours and early evening hours. Further, Phone-1's records indicate that it was again located in the same vicinity of the Elizabeth Residence on or about May 26, 2018 before traveling southbound in New Jersey towards the direction of Home-1 in

Delaware. Thereafter, the user of Phone-1 did not use the device any further during the times relevant to the burglary of Home-1.

10. On or about January 15, 2019, law enforcement responded to a residence in, Eatontown, New Jersey (“Home-2”) on a report of a residential burglary. Upon their arrival, law enforcement met with Home-2’s owner (“Victim-2”) a member of an Asian family-owned business, who reported that numerous items were stolen from Home-2 and that a back window was wide open. Victim-2 stated that approximately \$500,000 in United States currency was taken from a bedroom.

11. During the investigation, including the review of surveillance video and records associated with license plates, law enforcement determined that a specific Dodge Durango sports utility car (the “Dodge Durango”) was used in the commission of the burglary of Home-2. A review of law enforcement records associated with the Dodge Durango revealed that it was used by Rodgers, who resided at the Elizabeth Residence. On or about January 24, 2019, law enforcement officers located the Dodge Durango in the driveway of the Elizabeth Residence and observed Rodgers operating it on multiple occasions since on or about January 24, 2019.

12. As a result of the combination of evidence obtained via the investigation of the burglaries of Home-1 (location data placing Phone-1 within the vicinity of the Elizabeth Residence) and Home-2 (the Dodge Durango being in the driveway of the Elizabeth Residence and used by Rodgers), law enforcement conducted surveillance of the Elizabeth Residence. During the course of this surveillance, law enforcement learned that Burton also resided at the Elizabeth Residence and identified numerous individuals coming to and going from the Elizabeth Residence, including Armour and Jackson.

Arrest of Armour, Burton, and Jackson during a Residential Burglary

13. On or about March 5, 2019, law enforcement observed Armour travel from his residence in Easton, Pennsylvania (the “Armour Residence”), enter a red Honda sedan (the “Honda”) and ultimately drive to the Elizabeth Residence. Thereafter, Armour entered the Elizabeth Residence, and a short time later, exited the Elizabeth Residence with Burton. Armour and Burton then traveled to a business parking lot where they met with Jackson.

14. As law enforcement watched, Armour, Burton and Jackson drove in the Honda to the area of Old Bridge, New Jersey. Armour, Burton, and Jackson exited the Honda and made their way through back yards before arriving on the deck of a residence in Old Bridge (“Home-3”). Thereafter, law enforcement observed Armour, Burton, and Jackson unlawfully enter Home-3. As a result, law enforcement engaged in a foot pursuit of Armour, Burton, and Jackson. Law enforcement was able to arrest Burton and Jackson. Armour, however, was able to evade capture and was not arrested that evening. Based on Armour’s direction of flight, law enforcement recovered a backpack containing numerous items commonly used in furtherance of

burglary, including: a mask, gloves, a flashlight, and a canister of mace. Law enforcement subsequently arrested Armour on or about March 6, 2019. As with the other burglarized homes, Home-3 belonged to an individual of Asian descent (“Victim-3”).

Searches of Property Associated with Armour, Burton, and Rodgers

15. After arresting Armour, Burton, and Jackson¹, law enforcement conducted lawful searches of: Armour’s Residence, located in Easton, Pennsylvania, and a car associated with Armour; the Elizabeth Residence (Burton’s Residence and Rodgers’s Residence); and Jackson’s Residence, located in Roselle, New Jersey, and a car associated with Jackson.

16. During the search of Armour’s residence, law enforcement recovered: a Kimber model 1911 .45 caliber handgun, bearing serial number KSC0987 (the “Kimber Handgun”), sets of collectible coins, numerous items of jewelry, foreign currency, designer watches, and more than \$30,000 in United States currency. A review of law enforcement records associated with the Kimber Handgun revealed that it was reported stolen from the residence of an Asian business owner on or about January 18, 2018 in Allentown, Pennsylvania. Further, law enforcement later determined that several items recovered from Armour’s residence, including jewelry and coins, were derived from residential burglaries of Asian business owners in Pennsylvania and New Jersey.

17. From the residence associated with Burton and Rodgers (i.e., the Elizabeth Residence), the law enforcement seized items including: more than \$50,000 in US Currency; assorted foreign currency, including Asian coins; a hammer and pry bar; seven (7) walkie-talkies; two handguns; numerous rounds of handgun ammunition; numerous items of jewelry and watches; numerous purses; and a quantity of suspected marijuana. Further investigation revealed that several of the items recovered from Burton and Rodgers Elizabeth Residence were stolen from residences of Asian victims in New York, Pennsylvania, and New Jersey.

18. A search of vehicles belonging Rodgers resulted in the discovery of a note containing a list of numerous residential addresses. The list also denoted derogatory descriptive terms to identify the ethnicity of each of homeowners for the respective residences. Further, law enforcement recovered an additional firearm from one of Rodgers’s vehicles. A search of Jackson’s car yielded numerous items, including tracking devices created from magnets and cellular telephones.

19. A search of Armour’s car resulted in the recovery of numerous items, including handwritten notes with numerous addresses of residences in New Jersey known to be inhabited by Asian individuals, as well as a black backpack. A

¹ Armour, Burton, and Jackson were all charged by local authorities with burglary-related offenses as a result of law enforcement’s investigation in Old Bridge.

subsequent forensic examination of the paper containing these addresses resulted in a fingerprint match to Armour.

20. Likewise, law enforcement conducted lawful searches of cellular telephones seized from Armour, Burton, and Jackson and obtained historical call detail records associated with cellular telephone numbers used by Armour, Burton, Jackson, and other co-conspirators. Through examination of the contents of the cellular telephones seized from Armour, Burton, and Jackson, in addition to analysis of call detail records, law enforcement was able to determine that cellular telephones associated with the defendants were in close proximity to the locations of various burglaries matching the *modus operandi* of the conspiracy.

Interstate Burglaries and Identification of Co-Conspirators

21. In addition to arresting Armour, Burton, and Jackson in the act of committing a residential burglary in New Jersey, law enforcement also identified numerous other burglaries in New Jersey, New York, Pennsylvania, and Delaware, implicating these individuals and others, through analysis of historical cellular telephone records and the recovery of stolen property.

22. For example, on or about January 18, 2018, law enforcement responded to an Asian family's residence in Allentown, Pennsylvania ("Home-4"). The victim, ("Victim-4") explained to law enforcement that Victim-4's home had been ransacked, with a significant amount of United States currency, two firearms, and jewelry being stolen, resulting in an approximate loss value of \$23,000. Notably, one of the stolen firearms, the Kimber model 1911 .45 caliber handgun, bearing serial number KSC0987 was subsequently recovered during a lawful search of Armour's residence. A review of cellular telephone records associated with this burglary demonstrate contact between Armour's phone, Burton's phone, and Glasco's phone, and also demonstrates Burton's phone and Glasco's phone traveling between Pennsylvania and New Jersey during times relevant to the burglary of Home-4. Further, these records indicate Armour's phone and Burton's phone, and Glasco's phone travelled in the direction of Home-4 prior to this burglary. During the time period of this burglary, Armour's phone was in the vicinity of Home-4.

23. Additionally, law enforcement discovered text communications from on or about January 18, 2018 in Armour's cellular telephone coordinating a meeting with Burton in Pennsylvania prior to the burglary of Home-4. Cell-site data shows Burton's phone and Armour's phone in the vicinity of this meeting location. After this burglary, cell phone records display Armour's phone and Glasco's phone both traveling away from Home-4 into New Jersey. Further, Burton's phone travels away from Home-4, before ultimately being located in New Jersey the following day. The second firearm, a Ruger P94 .40 caliber SW handgun, bearing serial number 340-90284, previously stolen from Home-4 was ultimately recovered in Essex County, New Jersey on or about May 23, 2019.

24. On or about December 8, 2018, law enforcement responded to a residential burglary of an Asian victim ("Victim-5") in Queens, New York ("Home-5"). During the course of this burglary, various items of value, including jewelry, were stolen resulting in an approximate loss of \$101,583. On or about March 14, 2019, law enforcement recovered numerous items of jewelry and foreign currency from the Elizabeth Residence inhabited by Burton and Rodgers, and the Pennsylvania Residence inhabited by Armour. Victim-5 was able to identify several pieces of jewelry recovered from the Elizabeth Residence, that were previously stolen from Home-5, including family heirlooms that were in Victim-5's possession for approximately thirty (30) years. Likewise, Victim-5 was able to identify several pieces of unique jewelry and foreign coins previously stolen from Home-5, which were subsequently recovered from Armour's Pennsylvania Residence by law enforcement.

25. On or about December 11, 2018, law enforcement responded to a residential burglary of an Asian victim ("Victim-6") in Queens, New York ("Home-6"). During the course of this residential burglary, numerous items of value, including watches and jewelry, were stolen from Home-6, resulting in an approximate loss value of \$78,150. Law enforcement recovered a watch with Victim-6's name engraved on it from the Elizabeth Residence. Further, Victim-6 was able to identify other pieces of recovered jewelry from the Elizabeth Residence as previously stolen from Home-6. Additionally, law enforcement was able to analyze historical call detail records associated with: Rodgers demonstrating Rodgers's phone traveled from New Jersey to New York during times relevant to the burglary of Home-6; Glasco's phone traveling from Pennsylvania to the area of the Elizabeth Residence, being located in the same area as Burton's phone, and in close proximity to Rodgers's phone, prior to the burglary of Home-6, and then traveling to Queens in the area of Home-6; and Burton's phone traveling towards New York prior to the burglary of Home-6 and sending a text message to Armour stating that he was departing his residence with others.

26. On or about January 15, 2019, law enforcement responded to an Asian business owner's ("Victim-7") residence in Eatontown, New Jersey ("Home-7"). Victim-7 reported an approximate loss of \$523,000, including the theft of approximately \$500,000 in cash, as well as jewelry and a purse. On or about March 14, 2019, law enforcement recovered a large amount of United States currency held together by bands with handwritten notes, as well as designer purses from the Elizabeth Residence. Victim-7 was able to identify the bands with handwriting on them as his/her own, and identified a purse recovered from the Elizabeth Residence as previously stolen from Home-7. A review of historical call detail records reveals Glasco's phone traveling from Pennsylvania to New Jersey prior to the burglary of Home-7. Thereafter, historical call detail records demonstrate Burton's phone traveling from the area of the Elizabeth Residence to the area of Home-7 during times relevant to the burglary of Home-7. After the burglary of Home-7, historical call detail records display Glasco's phone and Burton's phone traveling to the area of the Elizabeth Residence, with Glasco ultimately returning to Pennsylvania.

27. In conducting further investigation into the recovered suspected burglary proceeds from the Elizabeth Residence and Armour's Pennsylvania Residence, law enforcement was able to attribute multiple items to various other burglaries. For example, law enforcement determined that several unique foreign currency items and jewelry were stolen from an Asian victim's ("Victim-8") residence ("Home-8") in Tannersville, Pennsylvania on or about December 2, 2016, which resulted in an approximate loss of \$340,635.57. Specifically, Victim-8 identified valuables, including foreign currency and a bracelet recovered from the Elizabeth Residence and Armour's Pennsylvania Residence. Victim-8 also reported that safes were stolen from Home-8. Law enforcement ultimately recovered two of Victim-8's stolen safes from a dumpster in Tannersville, Pennsylvania on or about February 3, 2017. These safes were found to be within a shipping box bearing an address that is the location of J. Hurt's home address in Tobyhanna, Pennsylvania.

28. A review of cell-site data associated with the burglary of Home-1 that occurred on or about May 26, 2018, in Newark, Delaware reveals the involvement of Burton, J. Hurt, and Glasco in relation to this offense. Prior to the burglary, law enforcement determined that: Glasco's phone, Burton's phone, and J. Hurt's phone traveled from New Jersey to the area of Home-1. After the burglary of Home-1, historical call detail records demonstrate Burton's phone, J. Hurt's phone, and Glasco's phone travel back to New Jersey.

29. Despite the arrests of Armour, Burton, Jackson, and Rodgers, burglary activity matching the *modus operandi* of the above-described criminal conduct continued. For example, on or about March 19, 2019, the Edison Police Department ("EDP") responded to a motor vehicle burglary that occurred in the rear parking lot of a Chinese food restaurant. The motor vehicle, which was broken into via the passenger-side window, belonged to an Asian business owner, ("Victim-9") of Hazlet, New Jersey. Through investigation, EDP developed a suspect vehicle in this burglary as a white Dodge Caravan.

30. Due to the burglary of Victim-9's vehicle, the Hazlet Police Department ("HPD") conducted surveillance of Victim-9's residence in Hazlet, New Jersey ("Home-9"). As a result, on or about March 20, 2019, HPD interrupted a burglary-in-progress at Home-9. HPD observed two males wearing all black clothing walking into the backyard and looking through the windows of Victim-9's residence. These individuals broke through the rear window and were attempting to enter the residence. At that time, HPD intervened and both suspects fled. After a foot pursuit, HPD arrested one suspect, Barr. HPD also discovered a white Dodge Caravan consistent with the Dodge Caravan identified on or about March 19, 2019. Through the windows of the Dodge Caravan, officers observed a ski mask, multiple cellular telephones, and various clothing.

31. During a post-*Miranda* interview, Barr admitted his involvement in the attempted burglary of Home-9 and that he had been a part of three prior home burglaries. Barr stated that he was solicited by a "head person," and directed to

Home-9. Barr stated that he knew, Armour, and that he was in custody from a burglary that occurred during the prior week, i.e., the burglary of Home-3.

32. A review of historical cell-site data associated with Barr, Armour, Burton, and Glasco demonstrates their involvement in a past burglary that occurred on or about October 23, 2018 in Edison, New Jersey. On this date, Edison Police responded to a residence in the municipality (“Home-10”) and met with the home-resident, an Asian business owner (“Victim-10”). Victim-10 reported that her/his car was burglarized at her/his place of business on or about October 18, 2018.

33. Thereafter, on or about October 23, 2018, Victim-10’s home was burglarized, resulting in the loss of approximately \$5,600 in cash and jewelry. A review of cell-site records indicates that Armour’s phone, traveled from his Pennsylvania residence to near the area of the Elizabeth Residence. Armour’s phone, Burton’s phone, and Barr’s phone then traveled to the area of the burglary of Home-10 at times relevant to the burglary of Home-10. Cell-site analysis also indicates that Glasco traveled from his residence in Pennsylvania to the vicinity of Home-10 during this time. After the burglary of Home-10, cell-site data indicates that Armour, Burton, Barr, and Glasco all traveled back to the area of the Elizabeth Residence. Thereafter, Armour’s phone, Burton’s phone, and Barr’s phone traveled towards their respective residences.

34. By way of another example, on or about February 28, 2019, law enforcement responded to a residence in Spotswood, New Jersey (“Home-11”) on a report of a recent home-invasion burglary. A relative (the “relative”) of the homeowner, an Asian restaurateur (“Victim-11”), reported that an unknown male unlawfully entered the victim’s home via an unlocked front door. At that time, this individual was confronted by the relative, who was present within the residence. As a result, this individual threatened the occupant of Home-11, leading to the theft of approximately \$1,000 and this individual’s immediate flight from the residence. A review of cellular telephone records related to J. Hurt shows numerous contacts with Black during the day of this home-invasion. Further, these records display J. Hurt’s cellular telephone in the area of the residence during times relevant to the home-invasion, as well as in the area of the victim’s restaurant and Home-11 the day prior to the home-invasion, and traveling to the area where Black is known to reside after the home-invasion. After leaving the area of Black’s residence in New Jersey subsequent to the home-invasion, J. Hurt’s cellular telephone traveled] from New Jersey into Pennsylvania.

35. On or about, December 26, 2018, law enforcement responded to an Asian individual’s (“Victim-12”) residence in Kenilworth, New Jersey (“Home-12”). The victim reported that he became engaged in a physical altercation with an unknown male who had unlawfully entered his home. During this altercation, this individual dropped a walkie-talkie at the scene. Subsequent testing of DNA derived from this walkie-talkie yielded a positive potential DNA association with Black. Further, Black’s criminal history includes an attempted burglary conviction, in

Middlesex County, related to an Asian individual's residence on or about December 6, 2014. At that time, Black was discovered in possession of notes with numerous residential addresses belonging to Asian individuals. "Victim-12" also ripped the sleeve off of an assailant. Subsequent DNA testing of this sleeve yielded a potential DNA association with Jackson.

36. On or about February 9, 2019, the Sayreville Police Department responded to the residence ("Home-13") of an Asian business owner ("Victim-13") on a report of a residential burglary. Victim-13 explained to law enforcement that Victim-13's home was ransacked, which resulted the loss of approximately \$1,350 in United States currency. Internal surveillance video from Home-13 shows multiple individuals ransacking Home-13. One individual was wearing a unique backpack, while another was using two-toned gloves, and had a flashlight. The backpack that law enforcement recovered from Armour's path of flight after the burglary of Home-3 is consistent with the backpack used by the assailant in Home-13. Further, the contents of the backpack recovered in relation to the burglary of Home-3 also contained consistent two-tone gloves and a flashlight. Cell-site records for this date indicate that Armour's phone traveled from Pennsylvania to the area of Elizabeth, New Jersey. A review of Armour's phone, which was seized incident to his arrest, reveals text communications between Armour and Black's phone, wherein Armour and Black coordinate meeting prior to the burglary of Home-13. Subsequent to the burglary, Armour's phone ultimately travels to the area of Roselle, New Jersey, where Jackson was known to reside.

Illegal Firearm Possession and Tampering by Burton and Keesha Davis

37. After Burton's arrest on or about March 5, 2019, Burton was confined in Middlesex County Jail. On or about March 6, 2019, Burton had a recorded conversation with defendant Keesha Davis ("Davis," Burton's significant-other), wherein Burton instructed Davis to provide Rodgers (whose nickname is Showtime) with Burton's firearms. After informing Davis of his arrest, Burton and Davis had the following exchange in sum and substance:

BURTON: Stop crying. I need you to, uh, talk and listen, okay?
Okay?

DAVIS: Yeah, yeah.

[After initially instructing Davis to perform a separate task, Burton continued]

BURTON: Okay, red...the "Showtime at the Apollo," let him know to clean. Just clean up, you know what I mean?

DAVIS: Yeah...

BURTON: Remember I showed you one like, this one that, that

one that...

DAVIS: Yeah...“Showtime” know to clean up?

BURTON: Yeah, you gotta’ give him the actual two, keep the minutes on the phone...

DAVIS: What else I gotta’ give, um, tell Showtime to clean up and then, um...

BURTON: Give that to Showtime, and be like...

DAVIS: Give Showtime the red....

BURTON: Yeah, and tell him to clean, um, his too. He’ll know what you’re talking about.

38. During the course of this investigation, law enforcement learned that the co-conspirators used the term “Showtime” with Rodgers. On or about March 14, 2019, law enforcement conducted a lawful search of the Elizabeth Residence, where Rodgers and Burton are known to reside in separate apartments. Law enforcement recovered three handguns during searches of the Elizabeth Residences and Rodgers’s vehicle, including: a Kahr Arms Model K40 .40 caliber semi-automatic handgun, bearing serial number DLO355 (the “Kahr handgun”), loaded with six (6) rounds of .40 caliber ammunition; a Baretta Model 92FS .9mm semi-automatic handgun, bearing serial number BER164834 (the “Baretta handgun”), loaded with fifteen (15) rounds of .9mm ammunition; and a Para 1911 .45 caliber semi-automatic handgun (the “Para” handgun), with a defaced serial number, loaded with eight (8) rounds of .45 caliber ammunition. Subsequent investigation revealed that after Burton had the above conversation with Davis, Davis delivered the Kahr handgun and the Baretta handgun at Burton’s direction to Rodgers.

39. A review of Burton’s criminal history reveals more than five (5) prior felony convictions prior to his possession of the firearm from on or about March 6, 2019 through on or about March 14, 2019, including:

- a. On or about May 3, 2010, in the Superior Court of New Jersey, Bergen County, for Burglary, in violation of N.J.S.A. 2C:18-2; a third-degree crime punishable by imprisonment for a term exceeding one year;
- b. On or about May 28, 2010, in the Superior Court of New Jersey, Union County, for Burglary, in violation of N.J.S.A. 2C:18-2, a third-degree crime punishable by imprisonment for a term exceeding one year; and
- c. On or about November 16, 2007, in the Superior Court of New Jersey, Essex County, for Receiving Stolen Property, in violation of N.J.S.A.

2C:20-7, a third-degree crime punishable by imprisonment for a term exceeding one year.

40. The Kahr handgun and the Baretta handgun are firearms manufactured outside the State of New Jersey and thus necessarily had to travel in interstate commerce prior to Burton's possession of the firearms in New Jersey on or about March 14, 2019. Additionally, the firearms are capable of, and designed to, expel a projectile.

Information obtained from "Co-Conspirator-1"

41. From in and during 2019 through in and during 2020, law enforcement interviewed a member and associate of this organized criminal enterprise ("Co-conspirator-1"). Co-conspirator-1 identified Armour, Burton, Glasco, Rodgers, and Jackson as part of this criminal organization. Co-conspirator-1 explained that the group targeted Asian individuals because it was believed that the victims kept large sums of currency and jewelry in their residences. Specifically, Co-conspirator-1 stated that these individuals searched the internet and conducted local reconnaissance for cash-businesses with an emphasis on those owned by Chinese and Indian individuals. Once a business was identified by these conspirators, the conspirators would travel to the business and ascertain the identity of the business owner and his/her vehicle. Thereafter, the conspirators would determine where the business owner physically resided so that a burglary of that residence could be conducted.

42. In sum, law enforcement recovered tens of thousands of dollars in United States and foreign currency, United States collectible coins, jewelry, heirlooms, a firearm, and other valuables that were transported across state lines between New Jersey, New York, Pennsylvania, Delaware and elsewhere.