

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROLAND JACKSON

CASE NUMBER:

18CR 646

CRIMINAL COMPLAINT MAGISTRATE JUDGE WEISMAN

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

On or about September 30, 2018, at Midlothian, Illinois, in the Northern District of Illinois, Eastern Division and elsewhere, the defendant violated:

Code Section

Title 18, United States Code, Section 922(g)(1)

Offense Description

having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, unlawfully possessed in or affecting interstate commerce, a firearm, namely: (1) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208945, (2) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208928, and (3) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372207151.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

SARGON MACKSUD

Special Agent, Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF)

Judge's signature

Sworn to before me and signed in my presence.

Date: October 1, 2018

City and state: Chicago, Illinois

M. DAVID WEISMAN, U.S. Magistrate Judge

Printed name and Title

INTAKE

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**M DAVID WEISMAN
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

AFFIDAVIT

I, SARGON MACKSUD, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been so employed since approximately January 2017. My current responsibilities include the investigation of criminal violations relating to the federal firearms laws, including Title 18, United States Code, Sections 922 and 924.

2. This affidavit is submitted in support of a criminal complaint alleging that Roland JACKSON (JACKSON) has violated Title 18, United States Code, Section 922(g)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JACKSON with receipt, possession, concealment, and storing of a stolen firearm, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts.

RUGER FIREARM UPS BURGLARY IN MEMPHIS, TENNESSEE

4. On September 28, 2018, the UPS distribution center in Memphis, Tennessee received sixteen pallets of firearms from the Ruger factory in North

Carolina. On September 30, 2018, a semi-trailer carrying sixteen pallets of firearms was scheduled to depart Memphis, Tennessee enroute to Dallas, Texas on September 30, 2018 at 8:00 a.m. At some time between 3:00 a.m. and 4:00 a.m., an alarm was triggered as an unauthorized U-Haul van drove onto the lot of the UPS distribution center. According to law enforcement, upon arrival at the distribution center, UPS employees observed two male, African-American individuals pushing a pallet of boxes across the lot. The individuals loaded the pallets into a U-Haul van, reversed and sped off the lot.

5. According to UPS, there were three stolen pallets and further investigation found that the contents of the three stolen pallets, contained approximately 367 firearms. The stolen items were .22 caliber and .380 caliber firearms.

RECOVERY OF FIREARMS IN MIDLOTHIAN, ILLINOIS

6. On September 30, 2018, at approximately 3:09 p.m., law enforcement received a call about suspicious activity at a store parking lot located in Midlothian, Illinois. Upon arrival, law enforcement found a U-Haul van parked in the lot bearing Arizona license plate AJ22258. The driver of the van identified himself as Roland JACKSON and the passenger of the van identified himself as Individual A. After a brief conversation, through the window of the van, law enforcement observed a white box with a "Ruger" logo on it.

7. Law enforcement requested that Individual A and JACKSON exit the van. Upon request, JACKSON opened the front, driver's side door and ran. Individual

A climbed into driver's seat, exited the van, and ran. After a brief chase, Individual A and JACKSON eluded law enforcement.

8. Law enforcement ran Individual A's name through an investigative database and identified Individual A as the passenger of the vehicle. Similarly, law enforcement ran JACKSON's name through an investigative database and identified JACKSON as the driver of the vehicle. After a search of the area, at approximately 6:54 p.m., law enforcement found and arrested Individual A and he was positively identified as the passenger in the van.

9. Upon seizure of the U-Haul van, law enforcement recovered approximately 364 Ruger .22 caliber and .380 caliber firearms. Among these recovered Ruger firearms were: (1) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208945, (2) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208928, and (3) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372207151. A check with the UPS distribution center located in Memphis, Tennessee found that the firearms recovered in the U-Haul van matched the firearms stolen from the UPS distribution center.

CONFESSION OF INDIVIDUAL A

10. Following his arrest, law enforcement spoke with Individual A. After waiving *Miranda*, Individual A stated, in sum and substance that he knew the individual he was with in the U-Haul van had previously stolen items from train shipments. Individual A denied participating in the theft but stated that he knew the firearms were stolen and that he was helping JACKSON and his brother sell the

stolen firearms. Additionally, Individual A stated that he and JACKSON had sold at least three of the stolen firearms for a total of \$400.

INTERSTATE NEXUS OF THE FIREARMS

11. Based on information provided by UPS and my training and experience, the (1) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208945, (2) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208928, and (3) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372207151 all traveled from North Carolina to Memphis, Tennessee, prior to JACKSON's possession of them on September 30, 2018.

CRIMINAL HISTORY OF JACKSON

12. According to JACKSON's criminal history record, on October 4, 2013, JACKSON was convicted in Cook County, Illinois, under case number 12 CR 1421602 of residential burglary. Residential burglary is a felony and is punishable by a term of imprisonment exceeding one year.

CONCLUSION

13. Based upon the foregoing facts, I respectfully submit that there is probable cause to believe that on or about September 30, 2018, defendant Roland JACKSON, having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, unlawfully possessed in or affecting interstate commerce, a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

FURTHER AFFIANT SAYETH NOT.

SARGON MACKSUD

Special Agent, Bureau of Alcohol, Tobacco,
Firearms, & Explosives (ATF)

SUBSCRIBED AND SWORN to before me on October 1, 2018.



M. DAVID WEISMAN

United States Magistrate Judge