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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
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 v. : Honorable Michael A. Hammer,  
 : U.S.M.J.  
 TORELL BROWN, :  
 CARTER WILKERSON, and : Mag. No. 21-10186 (MAH)  
 MARK WASHINGTON :

I, Brian K. Johnson-Logan, the undersigned complainant 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 Task Force Officer with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

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TFO Brian K. Johnson-Logan  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Task Force Officer Johnson-Logan attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on May 19, 2021, in the District of New Jersey

Honorable Michael A. Hammer  
United States Magistrate Judge

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Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Unlawfully Sell Firearms)

From at least April 2021 through on or about May 18, 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

**TORELL BROWN,  
CARTER WILKERSON, and  
MARK WASHINGTON,**

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, to willfully transfer, sell, trade, give, transport, and deliver firearms to any person, knowing, or having reasonable cause to believe, such person did not reside in South Carolina, the state of residence of defendants Brown and Wilkerson, contrary to Title 18, United States Code, Section 922(a)(5), and Title 18, United States Code, Section 2.

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

## **COUNT TWO**

(Possession of Firearms and Ammunition by Convicted Felons)

On or about May 18, 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

**TORELL BROWN and  
MARK WASHINGTON,**

each knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting commerce firearms and ammunition, namely, a Taurus Millennium PT Pro .40 caliber pistol, bearing serial number SBU30592, loaded with approximately two rounds of .40 caliber ammunition; a 9mm Zigana Px-9 (Tisas-Turkiye) pistol, bearing serial number T062021BM00363, loaded with 14 rounds of assorted ammunition; a Taurus Millennium PT 140 Pro .40 caliber handgun, bearing serial number SAV23640; a Radical Firearms LLC Model RF15 multi-caliber rifle, bearing serial number EPG16VZ; a SCCY Model CPX-2 9mm pistol, bearing serial number C054331; a 9mm FN Model 503 handgun, bearing serial number CV004938; approximately 50 rounds of .38 caliber ammunition; approximately 40 rounds of .40 caliber Smith & Wesson ammunition; six ball point 9mm rounds of ammunition, stamped "Luger;" and approximately 16 assorted .233 and .556 caliber rounds of ammunition.

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

## **ATTACHMENT B**

I, Brian K. Johnson-Logan, am a Task Force Officer with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives. 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 and documents. 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, defendants Torell Brown (“BROWN”) and Carter Wilkerson (“WILKERSON”) were residents of the State of South Carolina and defendant Mark Washington (“WASHINGTON”) was a resident of the State of New Jersey.

2. Defendant BROWN knew he was a convicted felon as he had at least one felony conviction for which he received a sentence of more than one year. For example, on or about November 2, 2015, BROWN was convicted in Essex County Superior Court in the State of New Jersey of manufacture/distribute CDS, in violation of N.J.S.A. 2C:35-5A(1), a crime punishable by imprisonment for a term exceeding one year, and for which BROWN was sentenced to 10 years’ imprisonment.

3. Defendant WASHINGTON knew he was a convicted felon as he had at least one felony conviction for which he received a sentence of more than one year. For example, on or about August 10, 2012, WASHINGTON was convicted in Essex County Superior Court in the State of New Jersey of felony theft, in violation of N.J.S.A. 2C:20-3, a crime punishable by imprisonment for a term exceeding one year, and for which WASHINGTON was sentenced to 15 months’ imprisonment.

4. Defendants BROWN, WILKERSON, and WASHINGTON 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.

5. It was the object of the conspiracy that defendants BROWN and WILKERSON, who are residents of South Carolina, would obtain firearms from states other than the State of New Jersey, and would then transport such firearms to the State of New Jersey for sale. It was further an object of the conspiracy that WASHINGTON would aid BROWN and WILKERSON by attempting to thwart law enforcement from recovering these firearms within the State of New Jersey.

6. 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. From on or about May 17, 2021 through on or about May 18, 2021, BROWN and WILKERSON trafficked firearms from at least one other state into the District of New Jersey, with the intent to sell such firearms.
- b. On or about May 18, 2021, BROWN and WILKERSON stored approximately six firearms, and quantities of ammunition, at a residence located on Union Avenue in Irvington, New Jersey (the "Residence"), including:
  - i. A Taurus Millennium PT Pro .40 caliber pistol, bearing serial number SBU30592, loaded with approximately two rounds of .40 caliber ammunition ("Firearm 1");
  - ii. A 9mm Zigana Px-9 (Tisas-Turkiye) pistol, bearing serial number T062021BM00363, loaded with 14 rounds of assorted ammunition ("Firearm 2");
  - iii. A Taurus Millennium PT 140 Pro .40 caliber handgun, bearing serial number SAV23640 ("Firearm 3");
  - iv. A Radical Firearms LLC Model RF15 multi-caliber rifle, bearing serial number EPG16VZ ("Firearm 4");
  - v. A SCCY Model CPX-2 9mm pistol, bearing serial number C054331 ("Firearm 5");
  - vi. A 9mm FN Model 503 handgun, bearing serial number CV004938 ("Firearm 6");
  - vii. One box containing approximately 50 rounds of .38 caliber ammunition;
  - viii. One box containing approximately 50 rounds of .40 caliber Smith & Wesson ammunition;
  - ix. Approximately six ball point 9mm rounds of ammunition, stamped "Luger;" and
  - x. Approximately 16 assorted .233 and .556 caliber rounds of ammunition.

(collectively, the "Firearms and Ammunition").

- c. On or about May 18, 2021, defendants BROWN and WILKERSON, together with two women, departed the Residence and entered a Lyft vehicle (the "Vehicle"). Law enforcement lawfully stopped the Vehicle along Route 21 in Newark, New Jersey.
- d. Soon after the aforementioned stop, law enforcement surveilling the Residence observed WASHINGTON, accompanied by another man, quickly depart from the back of the Residence, wheeling a shopping cart that held bags, including a suitcase (the "Suitcase"). An officer approached WASHINGTON and, suspecting that WASHINGTON was in possession of firearms, lifted the Suitcase from the shopping cart, and noted that the Suitcase was partially unzipped and observed what appeared to be a rifle (Firearm 4) inside the Suitcase. Pursuant to a lawful search of the Suitcase, law enforcement recovered Firearms 1 through 4, together with other items, including men's clothing and a pair of men's sneakers.
- e. Pursuant to a lawful search of the Residence, law enforcement recovered Firearms 5 and 6, from a backpack that also held two pill bottles, each containing a medication prescribed to WILKERSON, with WILKERSON's name on the label of each pill bottle.