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

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
 :
 v. : Mag. No. 21-9455
 :
 LARONMIR MCFADDEN, :
 KENDELL MCFADDEN, : **AMENDED**
 SAVON HARRISON : **CRIMINAL COMPLAINT**
 MICHAEL GAMBLE, :
 DONTAVIAN JONES and :
 DONJANEA MCCLARY :

I, Special Agent Christopher O'Brien, being duly sworn, state that 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 United States Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

_____/s/ Christopher O'Brien_____
Special Agent Christopher O'Brien
Bureau of Alcohol, Tobacco, Firearms and Explosives

Special Agent Christopher O'Brien attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on September 28, 2021 in New Jersey.

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

_____/s / Cathy L. Waldor_____
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Unlawfully Sell Firearms)

From at least in or around August 2019 through in or around September 2021, in the Counties of Somerset and Passaic, in the District of New Jersey and elsewhere, the defendants,

**LARONMIR MCFADDEN,
KENDELL MCFADDEN,
SAVON HARRISON,
MICHAEL GAMBLE,
DONJANE MCCLARY, and
DONTAVIAN JONES**

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 transfer, sell, trade, give, transport, and deliver any firearm, to any person other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, and knowing and having reasonable cause to believe that said persons did not reside in the States in which the transferor resided, contrary to Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

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

COUNT TWO
(Possession of a Firearm by a Convicted Felon)

On or about September 26, 2021, in Somerset County, in the District of New Jersey and elsewhere, the defendant,

KENDELL MCFADDEN,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce the following firearms and ammunition:

- (i) One (1) Glock 44, 22 caliber pistol, bearing serial number AFFW652, loaded with ten (10) rounds of ammunition;
- (ii) One (1) Glock 48, 9 millimeter pistol, bearing serial number BTYL165, loaded with ten (10) rounds of ammunition;
- (iii) One (1) Glock 19, 9 millimeter pistol, bearing serial number AFUR549;
- (iv) One (1) magazine loaded with 15 rounds of ammunition;
- (v) One (1) Glock 19, 9 millimeter pistol, bearing serial number BNVU574;
- (vi) One (1) Taurus PT111 G2, 9 millimeter pistol, bearing serial number TKU85870;
- (vii) One (1) Sig Sauer P320, 9 millimeter pistol, bearing serial number 58J166560;
- (viii) One (1) Highpoint Model JCP 40 caliber pistol, bearing serial number X7194439;
- (ix) One (1) Stoeger STR-9C pistol, bearing serial number T6429-21S08771;
- (x) One (1) Glock 17, 9 millimeter pistol, bearing serial number BABE361; and
- (xi) 20 rounds of ammunition.

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

ATTACHMENT B

I, Christopher O'Brien, am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I am fully familiar with the facts set forth here based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related here, 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. Since in or around August 2019, law enforcement has been conducting an investigation into numerous firearms purchased in or around Florence, South Carolina that were recovered in Paterson, New Jersey.

2. During the course of the investigation, law enforcement learned that defendants Kendell McFadden, Laronmir McFadden, Savon Harrison ("Harrison"), Donjanea McClary (Laronmir McFadden's girlfriend) ("McClary"), Michael Gamble ("Gamble"), and Dontavian Jones ("Jones") and others are involved in a conspiracy to purchase firearms in South Carolina and traffic and sell them in New Jersey and other states. The investigation has shown that the defendants have purchased firearms at various federal firearms licensees (the "Sellers") in or around Florence, South Carolina, where they reside, and transported and sold those firearms to individuals in and around Paterson, New Jersey and elsewhere.

3. At all times relevant to the complaint, Kendell McFadden was prohibited from purchasing or possessing firearms because of a prior felony conviction for unlawful possession of a firearm, in violation of N.J.S.A. 2C:35-5B, a crime punishable by imprisonment for a term exceeding one year, and for which Kendell McFadden was sentenced to 5 years' imprisonment.

4. Jones is prohibited from possessing, purchasing, shipping, and transporting firearms because of a prior conviction which could have been subject to an excess of one year of imprisonment under South Carolina law.

5. Laronmir McFadden is prohibited from possessing, purchasing, shipping, and transporting firearms because of a prior conviction which could have been subject to an excess of one years of imprisonment under South Carolina law.

6. Kendell McFadden and Laronmir McFadden directed Harrison, McClary and other straw purchasers (the “Straw-Purchaser”), known and unknown to law enforcement to purchase firearms at the Sellers. The Straw Purchasers would pay for the firearms with their own debit/credit cards or in cash. Laronmir McFadden and Kendell McFadden would pay Straw Purchasers both before the firearms purchases and/or after Kendell McFadden and Laronmir McFadden sold them for a profit.

7. Once the firearms were purchased, Kendell McFadden, Laronmir McFadden, Harrison and others, known and unknown would travel with the firearms from South Carolina to New Jersey. Kendell McFadden, Laronmir McFadden and Harrison would travel by bus or personal vehicles.

8. During the course of the conspiracy, law enforcement has identified at least thirteen (13) firearms purchased by Harrison in or around Florence, South Carolina. Six of those firearms were recovered in or around Paterson, New Jersey.

9. One of the recovered firearms included a 9-millimeter Taurus G2C handgun bearing serial number TLX74172 that Harrison bought in South Carolina on or about March 30, 2019 that was recovered in New Jersey on or about April 18, 2019.

10. On or about July 13, 2021, members of the Paterson Police Department recovered an S&W Shield EZ 9-millimeter handgun bearing serial number REX1099 (the “Recovered Firearm”) during the course of an arrest.

11. Law enforcement later learned that the Recovered Firearm was purchased along with four (4) additional firearms, listed below, a mere five days earlier by Harrison on or about July 9, 2021 from two Sellers in or around Florence, South Carolina (“Seller-1” and “Seller-2”).

- One (1) Springfield Armory XD-9 9-millimeter handgun, bearing serial number BA393141;
- One (1) S&W SD9 9-millimeter handgun bearing serial number FDK3416;
- One Taurus G2C 9-millimeter handgun bearing serial number 1C059247; and
- One (1) Century Canik TP9 9-millimeter handgun bearing serial number 21CB30951.

(collectively, the “Suspect Firearms”)

12. Based on the temporal proximity between the purchase in South Carolina and its recovery in New Jersey (*i.e.*, five days) and the Recovered

Firearm being part of a multiple firearm sale, law enforcement had probable cause to believe that Harrison trafficked the Suspect Firearms from South Carolina to New Jersey. Law enforcement thereafter observed social media posts of Kendell McFadden and Harrison in Paterson, New Jersey the following day. Law enforcement personally observed Kendell McFadden and Harrison in Paterson, New Jersey approximately two days later operating a white 2020 Mercedes Benz GLC 300, bearing North Carolina License Plate RBR9997 (the "Vehicle").

13. Law enforcement confirmed that Harrison utilized a credit card belonging to Gamble to purchase the Suspect Firearms. Law enforcement also reviewed surveillance video from Seller-2 and identified Gamble and Harrison purchasing the Suspect Firearms.

14. Records obtained from Kendell McFadden's Cash App account showed that Kendell McFadden had transmitted multiple payments just a few days before to Gamble totaling approximately \$950.

15. A review of records associated with Kendell McFadden's Instagram Account included communications relating to the purchase and sale of firearms in or around July 10, 2021. For example, on or about July 10, 2021, K. McFadden sent a message to an Instagram User ("User-1") advising User-1 that K. McFadden "has them sneakers I be having." Based on my training and experience and knowledge of the investigation, the term "sneakers" was a reference to firearms.

16. In another Instagram chat message on or about July 10, 2021, an Instagram User ("User-2") sent Kendell McFadden the following message: "how much for all three sneakers? . . . do me right" to which Kendell McFadden responded: "I get them retail at \$550 6." Based on my training and experience and knowledge of the investigation, the term "retail at \$550 6" was the price the firearms were purchased for in South Carolina.

17. In an Instagram chat message on or about July 10, 2021, another Instagram User ("User-3") sent Kendell McFadden a message asking if Kendell McFadden had "hand ones or them big shits" to which Kendell McFadden responded "hand." Based on my training and experience and knowledge of the investigation, Kendell McFadden was advising User-3 that he has handguns for sale.

18. On or about April 3, 2021, McClary purchased a Glock 44, 22 caliber pistol, bearing serial number AFFW652, loaded with ten (10) rounds of ammunition from Seller-1 in South Carolina (the "McClary April Firearm"). That same day, McClary also purchased an S&W SP9, 9-millimeter firearm, bearing serial number JFY8877 from Seller-2.

19. On or about August 13, 2021, McClary purchased a 9-millimeter Glock pistol bearing serial number BTYL165 (the “McClary August Firearm”) from Seller-2 in Florence, South Carolina.

20. Approximately a week later on or about August 22, 2021, law enforcement observed Laronmir McFadden and Kendell McFadden in Paterson, New Jersey operating the Vehicle.

21. A review of Kendell McFadden’s Instagram account revealed that the on or about the time law enforcement observed Kendell McFadden and Laronmir McFadden in New Jersey, Kendell McFadden sent a message to User-3 advising User-3 that Kendell McFadden was back in New Jersey. During the conversation User-3 asked Kendell McFadden “you got something?” Kendell McFadden responded, “Same type of shit.” User-3 then asked Kendell McFadden if he “has shells?” Based on my training and experience and knowledge of the investigation, Kendell McFadden was advising User-3 that he was back in New Jersey with handguns for sale and User-3’s question about “shells” was asking whether Kendell McFadden had ammunition for sale.

22. A few days later, on or about August 24, 2021, Laronmir McFadden posted a video his Snapchat Account depicting Kendell McFadden counting a large amount of cash in the backseat of the Vehicle with Laronmir McFadden.

23. Law enforcement has identified at least six firearms purchased by McClary in South Carolina. One of those firearms was a .380 caliber Spectrum Taurus handgun that was purchased as part of a multiple firearm sale on or about November 7, 2019 (the “McClary November Firearm”). The McClary November Firearm was recovered in Philadelphia, Pennsylvania approximately one month later. Based on the temporal proximity between the purchase in South Carolina and its recovery in Philadelphia, and being part of a multiple firearm sale, law enforcement had probable cause to believe that the McClary November Firearm was trafficked from South Carolina.

24. Law enforcement also observed on McClary’s Snapchat, videos posted by McClary of Laronmir McFadden in possession of multiple firearms.

25. On or about September 24, 2021, law enforcement learned that Harrison purchased a Stoeger STR-9C pistol, bearing serial number T6429-21S08771 from Seller-1 (the “Stoeger Firearm”).

26. Law enforcement observed from video surveillance at Seller-1 that after purchasing the Stoeger Firearm, Harrison departed Seller-1 in the Vehicle.

27. On or about September 26, 2021, law enforcement observed the Vehicle driving in New Jersey. After positioning themselves behind the Vehicle,

law enforcement observed the Vehicle commit a motor vehicle infraction in violation of New Jersey motor vehicle laws.

28. As officers approached the Vehicle, they observed approximately four people moving around inside the Vehicle.

29. After making contact with the occupants of the Vehicle, law enforcement identified the driver as Jones. Law enforcement thereafter identified Kendell McFadden in the passenger seat, Harrison in the rear passenger seat and Laronmir McFadden in the rear driver's seat.

30. During the course of the motor vehicle stop, law enforcement observed Harrison moving around and reaching into the seat pocket behind the passenger seat.

31. Based on the foregoing facts and for officer safety, law enforcement removed all the occupants from the Vehicle. Law enforcement observed in plain view next to Jones as he exited the Vehicle, an empty Blackhawk gun holster in the driver's side door. Law enforcement also observed that a cellular phone next to both Jones and Kendell McFadden had a GPS map directing Jones to an address in Paterson, New Jersey.

32. After being removed from the Vehicle, Harrison advised law enforcement that he was in possession of a firearm. Law enforcement thereafter recovered a Glock 19, 9 millimeter pistol, bearing serial number AFUR549 and a magazine loaded with ten (10) rounds of ammunition from the passenger seatback pocket in in front of Harrison.

33. During a lawful search of the Vehicle, law enforcement recovered the following additional firearms and ammunition from the center console in the rear passenger seat between Harrison and Laronmir McFadden:

- The McClary April Firearm, loaded with ten (10) rounds of ammunition; and
- The McClary August Firearm, loaded with ten (10) rounds of ammunition.

34. During a lawful search of the trunk of the Vehicle, law enforcement located a blue backpack and grey duffle bag containing the below firearms and ammunition:

- Blue Backpack
 - One (1) Glock 19, 9 millimeter pistol, bearing serial number BNVU574;

- One (1) Taurus PT111 G2, 9 millimeter pistol, bearing serial number TKU85870;
- One (1) Sig Sauer P320, 9 millimeter pistol, bearing serial number 58J166560;
- Grey Duffle Bag
 - One (1) Highpoint Model JCP 40 caliber pistol, bearing serial number SN-X7194439;
 - One (1) Glock 17, 9 millimeter pistol, bearing serial number BABE361;
 - The Stoeger Firearm, purchased by Harrison on or about September 24, 2021; and
 - Approximately 20 rounds of ammunition.

35. Neither Kendell McFadden, Harrison, Laronmir McFadden, Jones, Gamble, or McClary are licensed under the provisions of Chapter 44 of Title 18 of the United States Code as an importer, manufacturer, dealer, or collector of firearms.