

---

---

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

---

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Douglas E. Arpert  
 :  
 LASHAWN ALFORD : Mag. No. 20-6013 (DEA)  
 :

I, Renee Repasky, 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 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/RENEE REPASKY  
Renee Repasky, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1(b)(2)(A) on December 9, 2020,  
in the District of New Jersey

HONORABLE DOUGLAS E. ARPERT                      s/DOUGLAS E. ARPERT  
UNITED STATES MAGISTRATE JUDGE              Signature of Judicial Officer

**ATTACHMENT A**

On or about July 20, 2020, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

**LASHAWN ALFORD,**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, namely, a Smith and Wesson, model M&P Compact, .22 caliber pistol, serial number HHS5373, and the firearm was in and affecting commerce.

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

## **ATTACHMENT B**

I, Renee Repasky, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). 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, documents and other 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.

1. On July 20, 2020, Monmouth County Prosecutor's Office Detectives and Neptune City Police Officers responded to an apartment complex in Neptune City to conduct surveillance of suspected gang activity. Law enforcement observed defendant LASHAWN ALFORD exit an apartment and approach a vehicle. Law enforcement knew ALFORD to be a member of the Queen Street II Bloods street gang. As he approached the vehicle, ALFORD adjusted an object in his waistband, causing law enforcement to suspect that he was armed with a firearm. ALFORD entered the rear passenger side of the vehicle. The vehicle exited the parking lot of the apartment complex with five occupants. Law enforcement determined that ALFORD had an outstanding warrant for his arrest for traffic violations in Asbury Park.

2. Officers stopped the vehicle in which ALFORD was a passenger. Law enforcement removed ALFORD from the vehicle and placed him under arrest. Once he was removed from the vehicle, law enforcement saw the butt of a handgun in plain view protruding from under the back of the front passenger seat in the area where ALFORD had been seated. Further investigation revealed that the firearm, a Smith and Wesson, model M&P Compact, .22 caliber pistol, serial number HHS5373, was loaded with one round of ammunition. ALFORD later admitted to law enforcement that the handgun belonged to him and accurately described it as being loaded with one round of ammunition.

3. Subsequent analysis confirmed that the firearm was not manufactured in the State of New Jersey and therefore moved in interstate commerce before July 20, 2020.

4. On December 18, 2015, ALFORD was convicted in the Superior Court of New Jersey, Monmouth County, of aggravated assault with a deadly weapon, in violation of N.J.S.A. 2C:12-1B(2), a crime punishable by imprisonment for a term exceeding one year. ALFORD was sentenced to a term of three years' imprisonment for that conviction.