

STATE OF NEW YORK  
TOWN COURTCOUNTY OF MONROE  
TOWN OF HENRIETTA*The People of the State of New York**-against-***FELONY  
COMPLAINT****KORDELL J. JACKSON**      *DOB: 12/30/1975*  
*107 Grangerford Heights, West Henrietta, NY 14586**Defendant.*

Investigator R.A. Kotin employed by the New York State Police, by this information makes written accusation as follows:

That **KORDELL J. JACKSON** from on or before February 2, 2013, through on or about June 22, 2013, at the premises known as Jackson Guns and Ammo, 1555 East Henrietta Road, in the Town of Henrietta, New York, did commit the armed felony offense of **Criminal Sale of a Firearm in the first degree**, a class B felony, contrary to the provisions of Section 265.13(2) of the Penal Law of the State of New York ("Penal Law").

CHARGES: A person is guilty of criminal sale of a firearm in the first degree when such person: (2) unlawfully sells, exchanges, gives or disposes of to another person or persons a total of ten or more firearms in a period of not more than one year.

**THE FACTS ON WHICH THIS ACCUSATION IS MADE ARE OF MY OWN KNOWLEDGE OR ON INFORMATION AND BELIEF AS FOLLOWS:**

That your complainant is a police officer for the New York State Police, and is currently assigned to the Community Narcotics Enforcement Unit. The defendant operated a business known as Jackson Guns and Ammo located at 1555 East Henrietta Road in the Town of Henrietta, County of Monroe, State of New York, and during the specified time period he unlawfully sold, exchanged, gave or disposed of ten (10) or more firearms, specifically assault weapons as defined by Section 265.00(22) of the Penal Law, to persons in a period of not more than one year. On the dates indicated below, the defendant did sell, exchange, give or dispose of the following weapons:

<u>DATE</u>	<u>MANUFACTURER</u>	<u>MODEL</u>	<u>SERIAL NO.</u>
02/02/2013	American Tactical Imports	GSG522	A383947
02/21/2013	American Tactical Imports	STG44	A506765
02/21/2013	American Tactical Imports	STG44	A506753
03/01/2013	Smith and Wesson	M&P15-22	DUR8250
03/06/2013	Windham Weaponry	R16M4	WW074657
03/06/2013	Windham Weaponry	R16M4	WW074614
03/06/2013	Windham Weaponry	R16M4	WW071068
03/06/2013	Windham Weaponry	R16M4	WW074792
03/06/2013	Windham Weaponry	R16M4	WW074220
03/06/2013	Windham Weaponry	R16M4	WW074625

03/13/2013	Smith and Wesson	M&P 15	SR45090
03/13/2013	Windham Weaponry	R16M4	WW074228
03/29/2013	Just Right Carbine	JRC9	JRCV039376
06/21/2013	Just Right Carbine	JRC9	JRCV039855
06/22/2013	Just Right Carbine	JRC9	JRCV039858

Each of the aforementioned weapons were recovered and subsequently examined by members of the New York State Police and deemed to be operable.

The basis of this complainant is my personal knowledge, training and experience, my conversations with other law enforcement officials, including members of the New York State Police, the Depositions of Russell Burry, Peter Timm, Kirk Minard, Jorge Canete, Jason Yates, James Dobbins, Matthew Privett, Michael Silla and Jon Black, as well as New York State Police Firearms Reports, and Firearms Transaction Records, which are attached hereto and made a part of this accusatory instrument.

I realize that false statements made in the foregoing instrument are punishable as a Class A Misdemeanor pursuant to Section 210.45 of the Penal Law. Accordingly and with notice of the foregoing, I hereby affirm that the foregoing statements of facts are true, this \_\_\_ day of June, 2016.

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Witness

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Investigator R.A. Kotin