

The People of the State of New York

-against-

**FELONY
COMPLAINT**

JOSHUA D. PERKINS [REDACTED]
[REDACTED]

KORDELL J. JACKSON [REDACTED]
[REDACTED]

Defendants

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

That **JOSHUA D. PERKINS** and **KORDELL J. JACKSON**, acting in concert from on or before January 24, 2013, through on or about July 26, 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. During the aforementioned time period, Kordell J. Jackson operated and Joshua D. Perkins was an employee of 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 said defendants, acting in concert, 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 defendants did sell, exchange, give or dispose of the following weapons:

<u>DATE</u>	<u>MANUFACTURER</u>	<u>MODEL</u>	<u>SERIAL NO.</u>
01/24/2013	Just Right Carbine	JRC9	[REDACTED]
01/24/2013	Stag Arms	Model 2	
02/15/2013	Bushmaster	XM15ES2	
03/01/2013	Armalite	LEC15	
03/07/2013	Windham Weaponry	R16M4	
03/09/2013	Windham Weaponry	R16M4	

03/15/2013	Windham Weaponry	R16M4
04/12/2013	American Tactical Imports	GSG5
05/09/2013	Diamondback	DB15
06/27/2013	Mossberg	715T
07/26/2013	Mossberg	715T



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, Scott Miller, Sean Donohoe, Nathan Hahn, James Lindsay, Jason Minns and Adam Boccardo, 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.

Witness

Investigator R.A. Kotin