

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ751-21-19  
Superior Court  
Docket Number 21-3-33-S

STATE OF NEW JERSEY )  
 )  
 v. ) INDICTMENT  
 )  
 ROBERT CROSLEY )  
 )  
 MATTHEW ZOBA )  
 )  
 VICTORIA ZIPF )  
 )  
 and )  
 )  
 YURI LYUBINSKIY )

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

ROBERT CROSLEY

MATTHEW ZOBA

VICTORIA ZIPF

and

YURI LYUBINSKIY

who are named as defendants herein, and other persons whose  
identities are known and unknown to the Grand Jurors, who are named

as co-conspirators but not has defendants herein, between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Transporting Weapons into the State for Unlawful Sale or Transfer, Unlawful Disposition of Firearms, Unlawful Disposition of Assault Firearms, Unlawful Disposition of a Sawed-Off Shotgun or Rifle, and Unlawful Disposition of Large Capacity Ammunition Magazines, did agree together, and with persons whose identities are unknown to the Grand Jurors, who at all times relevant to this indictment were an undercover agent of the Drug Enforcement Administration and an agent of the New Jersey State Police, that:

1. One or more of them would engage in conduct which would constitute the aforesaid crimes, or

2. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

A. Knowingly or purposely transport, ship, or otherwise bring into this State any firearm for the purpose of unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to N.J.S.A. 2C:39-9i.

B. Knowingly transport, ship, sell, or dispose of a firearm without being licensed or registered to do so as provided in Chapter 58, contrary to N.J.S.A. 2C:39-9d.

C. Knowingly transport, ship, sell, or dispose of an assault firearm, without being registered or licensed to do so pursuant to N.J.S.A. 2C:58-1 et. seq., contrary to N.J.S.A. 2C:39-9g.

D. Knowingly manufacture, transport, ship, sell, or dispose of a sawed-off shotgun or rifle, contrary to the provisions of N.J.S.A. 2C:39-9b.

E. Knowingly transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy - Second Degree)

ROBERT CROSLEY

MATTHEW ZOBA

VICTORIA ZIPF

and

YURI LYUBINSKIY

who are named as defendants herein, and other persons whose identities are known to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Distribution of a Controlled Dangerous Substance, did agree together, and with persons whose identities are unknown to the Grand Jurors, who at all times relevant to this indictment were an undercover agent of the Drug Enforcement Administration, and an agent of the New Jersey State Police, that:

1. One or more of them would engage in conduct which would constitute the aforesaid crimes, or

2. One or more of them would aid in the planning,

solicitation or commission of said crimes, that is:

A. Knowingly or purposely distribute a controlled dangerous substance, that is, methamphetamine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(8), and N.J.S.A. 2C:35-5c.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Promoting Organized Street Crime - First Degree)

ROBERT CROSLEY

between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Unlawful Possession of a Sawed-Off Shotgun or Rifle, in violation of N.J.S.A. 2C:39-3b; Possession of Hollow Nose Ammunition, in violation of N.J.S.A. 2C:39-3f; Possession of Large Capacity Ammunition Magazines, in violation of N.J.S.A. 2C:39-3j; Unlawful Possession of a Handgun, in violation N.J.S.A. 2C:39-5b; Unlawful Possession of a Rifle, in violation N.J.S.A. 2C:39-5c(1); Unlawful Possession of an Assault Firearm, in violation of N.J.S.A. 2C:39-5f; Manufacture, Transport, Disposition of a Sawed-Off Shotgun or Rifle, in violation of N.J.S.A. 2C:39-9b; Manufacture, Transport, Disposition of a Weapon, in violation of N.J.S.A. 2C:39-9d; Manufacture, Transport, Disposition of an Assault Firearm, in violation of N.J.S.A. 2C:39-9g; Manufacture, Transport, Disposition of Large Capacity Ammunition Magazines, in violation of N.J.S.A. 2C:39-9h; and/or

Transporting a Firearm into this State for an Unlawful Sale or Transfer, in violation N.J.S.A. 2C:39-9i, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Promoting Organized Street Crime - First Degree)

MATTHEW ZOBA

between on or about November 5, 2019, and on or about January 6, 2020, at the City of Camden, in the County of Camden, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Distribution of a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution of a Controlled Dangerous  
Substance - First Degree)

ROBERT CROSLEY

between on or about March 1, 2019, and on or about December 17, 2019, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, methamphetamine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(8), N.J.S.A. 2C:35-5(c), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Distribution of a Controlled Dangerous  
Substance - First Degree)

MATTHEW ZOBA

between on or about November 5, 2019, and on or about January 6, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, methamphetamine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(8), N.J.S.A. 2C:35-5(c), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Transporting Weapons into the State for  
Unlawful Sale or Transfer - Second Degree)

ROBERT CROSLEY

MATTHEW ZOBA

VICTORIA ZIPF

and

YURI LYUBINSKIY

between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did transport, ship, or otherwise bring into this State any firearm for the purpose of unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to N.J.S.A. 2C:39-9i, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Unlawful Possession of a Rifle - Third Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about March 1, 2019, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .223 Remington caliber Olympic Arms M.F.R. semi-automatic rifle, serial number JS00902; and/or a .223 Remington caliber Eagle Arms Eagle-15 semi-automatic rifle, serial number M22-37736, without having first obtained a firearms purchaser identification card in accordance with the provisions of N.J.S.A. 2C:58-3, contrary to the provisions of N.J.S.A. 2C:39-5c(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Possession of Large Capacity  
Ammunition Magazines - Fourth Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about March 1, 2019, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess two large capacity ammunition magazines, contrary to the provisions of N.J.S.A. 2C:39-3j, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Manufacture, Transport, Disposition  
of a Rifle - Fourth Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about March 1, 2019, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a .223 Remington caliber Olympic Arms M.F.R. semi-automatic rifle, serial number JS00902; and/or a .223 Remington caliber Eagle Arms Eagle-15 semi-automatic rifle, serial number M22-37736, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Manufacture, Transport, Disposition of Large  
Capacity Ammunition Magazines - Fourth Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about March 1, 2019, at the Township of Cherry Hill, in the  
County of Camden, elsewhere, and within the jurisdiction of this  
Court, knowingly did transport, ship, sell, or dispose of large  
capacity ammunition magazines, contrary to the provisions of  
N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this  
State, the government and dignity of the same.

COUNT TWELVE

(Unlawful Possession of an Assault Firearm - Second Degree)

ROBERT CROSLEY

on or about October 3, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7009208, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Unlawful Possession of a Large Capacity  
Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 3, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Manufacture, Transport, Disposition of  
an Assault Firearm - Third Degree)

ROBERT CROSLEY

on or about October 3, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of an assault firearm, that is, a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7009208, without having been registered or licensed to do so pursuant to N.J.S.A. 2C: 58-1 et. seq., contrary to the provisions of N.J.S.A. 2C:39-9g, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

Manufacture, Transport, Disposition of a Large  
Capacity Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 3, 2019, at the City of Camden, in the County  
of Camden, elsewhere, and within the jurisdiction of this Court,  
knowingly did transport, ship, sell, or dispose of a large capacity  
ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-  
9h, and against the peace of this State, the government and dignity  
of the same.

COUNT SIXTEEN

(Unlawful Possession of an Assault Firearm - Second Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 5.56 x 45mm caliber Smith & Wesson M&P15 semi-automatic rifle, serial number SM93944, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Jimenez Arms JA9 semi-automatic pistol, serial number 441588, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Unlawful Possession of a Large Capacity  
Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Manufacture, Transport, Disposition of  
an Assault Firearm - Third Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of an assault firearm, that is, a 5.56 x 45mm caliber Smith & Wesson M&P15 semi-automatic rifle, serial number SM93944, without having been registered or licensed to do so pursuant to N.J.S.A. 2C:58-1 et. seq., contrary to the provisions of N.J.S.A. 2C:39-9g, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Luger caliber Jimenez Arms JA9 semi-automatic pistol, serial number 441588, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Manufacture, Transport, Disposition of a Large  
Capacity Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Unlawful Possession of an Assault Firearm - Second Degree)

ROBERT CROSLEY

on or about October 24, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7007533, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Unlawful Possession of a Large Capacity  
Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 24, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Manufacture, Transport, Disposition of  
an Assault Firearm - Third Degree)

ROBERT CROSLEY

on or about October 24, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of an assault firearm, that is, a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7007533, without having been registered or licensed to do so pursuant to N.J.S.A. 2C:58-1 et. seq., contrary to the provisions of N.J.S.A. 2C:39-9g, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Manufacture, Transport, Disposition of a Large  
Capacity Ammunition Magazine - Fourth Degree)

ROBERT CROSLEY

on or about October 24, 2019, at the City of Camden, in the County  
of Camden, elsewhere, and within the jurisdiction of this Court,  
knowingly did manufacture, transport, ship, sell, or dispose of a  
large capacity ammunition magazine, contrary to the provisions of  
N.J.S.A. 2C:39-9h, and against the peace of this State, the  
government and dignity of the same.

COUNT TWENTY-SIX

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

and

MATTHEW ZOBA

on or about November 5, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Glock model 43 semi-automatic pistol, serial number ACWC016, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

and

MATTHEW ZOBA

on or about November 5, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Luger caliber Glock model 43 semi-automatic pistol, serial number ACWC016, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

on or about November 18, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .357 Magnum caliber Smith & Wesson revolver, bearing serial number 77K8240, and/or a 9mm Luger caliber Smith & Wesson semi-automatic pistol, serial number TAL8669, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

and

MATTHEW ZOBA

on or about November 18, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a .357 Magnum caliber Smith & Wesson revolver, serial number 77K8240, and/or a 9mm Luger caliber Smith & Wesson semi-automatic pistol, serial number TAL8669, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about November 21, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .38 Special caliber Smith & Wesson revolver, serial number K273433, without first having obtained a permit to carry a handgun as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

and

YURI LYUBINSKIY

on or about November 21, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a .38 Special caliber Smith & Wesson revolver, serial number K273433, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Possession of Hollow Nose Ammunition - Fourth Degree)

MATTHEW ZOBA

on or about December 3, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon or device, that is, hollow nose ammunition, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

on or about December 4, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .357 Magnum caliber Smith & Wesson revolver, serial number 9K2144, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

on or about December 4, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a .357 Magnum caliber Smith & Wesson revolver, serial number 9K2144, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly possess a certain weapon, that is, a 9mm Luger caliber Glock semi-automatic pistol, serial number BHHH030, without first having obtained a permit to same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Unlawful Possession of a Rifle - Third Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a 7.62 x 39mm caliber Yugoslavian semi-automatic rifle, serial number 0-00004, without having first obtained a firearms purchaser identification card in accordance with the provisions of N.J.S.A. 2C:58-3, contrary to the provisions of N.J.S.A. 2C:39-5c(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Possession of a Sawed-Off Rifle - Third Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a sawed-off rifle, contrary to the provisions of N.J.S.A. 2C:39-3b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Unlawful Possession of Large Capacity  
Ammunition Magazines - Fourth Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess two large capacity ammunition magazines, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Luger caliber Glock semi-automatic pistol, serial number BHHH030, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Manufacture, Transport, Disposition  
of a Rifle - Fourth Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 7.62 x 39mm caliber Yugoslavian semi-automatic rifle, serial number 0-00004, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Manufacture, Transport, Disposition  
of a Sawed-Off Rifle - Third Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a sawed-off rifle, that is, a 7.62 x 39mm caliber Yugoslavian semi-automatic rifle, serial number 0-00004, contrary to the provisions of N.J.S.A. 2C:39-9b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Manufacture, Transport, Disposition of Large  
Capacity Ammunition Magazines - Fourth Degree)

ROBERT CROSLEY

on or about December 17, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of two large capacity ammunition magazines, contrary to the provisions of N.J.S.A. 2C:39-9h, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Unlawful Possession of a Weapon - Second Degree)

MATTHEW ZOBA

and

VICTORIA ZIPF

on or about December 18, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .40 S&W caliber Glock semi-automatic pistol, serial number BELM386, and/or a 9mm Luger caliber Smith & Wesson M&P Shield semi-automatic pistol, serial number JDX6993, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Possession of Hollow Nose Ammunition - Fourth Degree)

MATTHEW ZOBA

and

VICTORIA ZIPF

on or about December 18, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon or device, that is, hollow nose ammunition, contrary to the provisions of N.J.S.A. 2C:39-3f, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

MATTHEW ZOBA

and

VICTORIA ZIPF

on or about December 18, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a .40 S&W caliber Glock semi-automatic pistol, serial number BELM386, and/or a 9mm Luger caliber Smith & Wesson M&P Shield semi-automatic pistol, serial number JDX6993, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Unlawful Possession of a Weapon - Second Degree)

MATTHEW ZOBA

on or about January 6, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Ruger EC9S semi-automatic pistol, serial number 456-62022, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Manufacture, Transport, Disposition  
of a Weapon - Fourth Degree)

MATTHEW ZOBA

on or about January 6, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Luger caliber Ruger EC9S semi-automatic pistol, serial number 456-62022, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERT CROSLEY

between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, methamphetamine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-NINE

(Possession with the Intent to Distribute a  
Controlled Dangerous Substance - Second Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, methamphetamine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(9)(a), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

(Possession of a Firearm During the Commission  
Of Certain Crimes - Second Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess certain weapons, that is, a .25 Auto caliber F.I.E. Titan semi-automatic pistol, serial number A12657, and a .22 caliber New England Firearms Gardner revolver, serial number NG008637, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

(Unlawful Possession of an Assault Firearm - Second Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 5.56 x 45mm caliber Smith & Wesson M&P15 semi-automatic rifle, serial number TM21644, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Unlawful Possession of a Weapon - Second Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .25 Auto caliber F.I.E. Titan semi-automatic pistol, serial number A12657, and/or a .22 caliber New England Firearms Gardner revolver, serial number NG008637, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Unlawful Possession of a Shotgun - Third Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a Saiga model 12 12-gauge semi-automatic shotgun, serial number 14605398, and/or a Benelli SuperNova 12-gauge pump action shotgun, serial number Z720904Q14, without having first obtained a firearms purchaser identification card in accordance with the provisions of N.J.S.A. 2C:58-3, contrary to the provisions of N.J.S.A. 2C:39-5c(1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FOUR

(Unlawful Possession of a Sawed-Off Shotgun - Third Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a sawed-off shotgun, contrary to the provisions of N.J.S.A. 2C:39-3b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FIVE

(Possession of Hollow Nose Ammunition - Fourth Degree)

ROBERT CROSLEY

on or about January 22, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon or device, that is, hollow nose ammunition, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

(Certain Persons Not to Have Weapons - Second Degree)

ROBERT CROSLEY

between on or about March 1, 2019, and on or about January 22, 2020, at the City of Camden, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of felony Manufacture, Deliver, or Possession with Intent to Manufacture or Deliver a Controlled Substance, in Bucks County, Pennsylvania, on or about March 23, 2010, under CP-09-CR-0000242-2010, did purchase, own, possess or control the following firearms: a .223 Remington caliber Olympic Arms M.F.R. semi-automatic rifle, serial number JS00902; and/or a .223 Remington caliber Eagle Arms Eagle-15 semi-automatic rifle, serial number M22-37736; or a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7009208; and/or a 5.56 x 45mm caliber Smith & Wesson M&P15 semi-automatic rifle, serial number SM93944; and/or a 9mm Luger caliber Jimenez Arms JA9 semi-automatic pistol, serial number 441588; or a 7.62 x 39mm caliber Century Arms VSKA semi-automatic rifle, serial number SV7007533; and/or a 9mm Luger caliber Glock model 43 semi-automatic pistol, bearing serial number ACWC016; and/or a .357 Magnum caliber Smith & Wesson revolver, bearing serial number 77K8240; and/or a 9mm Luger caliber Smith & Wesson semi-automatic pistol, serial number TAL8669; and/or a .38 Special caliber Smith

& Wesson revolver, serial number K273433; and/or a .357 Magnum caliber Smith & Wesson revolver, bearing serial number 9K2144; and/or a 9mm Luger caliber Glock semi-automatic pistol, serial number BHHH030; and/or a 7.62 x 39mm caliber Yugoslavian semi-automatic rifle, serial number 0-00004; and/or a 5.56 x 45mm caliber Smith & Wesson M&P15 semi-automatic rifle, serial number TM21644; and/or a .25 Auto caliber F.I.E. Titan semi-automatic pistol, bearing serial number A12657; and/or a .22 caliber New England Firearms Gardner revolver, serial number NG008637; and/or a Saiga model 12 12-gauge semi-automatic shotgun, serial number 14605398; and/or a Benelli SuperNova 12-gauge pump action shotgun, serial number Z720904Q14; and/or Victor Ejector 12-gauge single barrel shotgun, bearing no serial number, and assigned identification number NJ191555-49, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

(Certain Persons Not to Have Weapons - Second Degree)

MATTHEW ZOBA

between on or about November 5, 2019, and on or about January 6, 2020, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Robbery, in Philadelphia, Pennsylvania, on or about August 23, 2002, under CP-51-CR-1213212-2001, and/or felony Manufacture, Deliver, or Possession with Intent to Manufacture or Deliver a Controlled Substance, in Delaware County, Pennsylvania, on or about March 17, 2003, under CP-23-CR-0000141-2003, and/or felony Manufacture, Deliver, or Possession with Intent to Manufacture or Deliver a Controlled Substance, in Delaware County, Pennsylvania, on or about October 4, 2012, under CP-23-CR-0005472-2012, did purchase, own, possess or control the following firearms: a 9mm Luger caliber Glock model 43 semi-automatic pistol, serial number ACWC016; or a .40 S&W caliber Glock semi-automatic pistol, serial number BELM386; or a 9mm Luger caliber Smith & Wesson M&P Shield semi-automatic pistol, serial number JDX6993; or a 9mm Luger caliber Ruger EC9S semi-automatic pistol, serial number 456-62022,

contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.



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AAG Veronica Allende  
Director  
Division of Criminal Justice

A TRUE BILL:

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Foreperson

Dated: **3/30/21**