



herein, one of whom at all times relevant to this indictment was an agent of the New Jersey State Police, that:

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

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

1. Knowingly to possess a firearm, that is, a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, without having first obtained a firearms purchaser identification card as provided in N.J.S.A. 2C:58-3, contrary to the provisions of N.J.S.A. 2C:39-5c(1) and N.J.S.A. 2C:2-6.

2. Knowingly to manufacture, transport, ship, sell or dispose of a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, without being 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:39-9d and N.J.S.A. 2C:2-6.

#### OVERT ACTS

The State alleges that in pursuance of the said conspiracy, the following OVERT ACTS, among others, were committed:

1. During the month of February 2019, RAJON GLOVER contacted an agent of the New Jersey State Police to sell him/her a firearm.

2. On February 25, 2019, RAJON GLOVER agreed to meet with and sell a firearm to an agent of the New Jersey State Police.

3. On February 25, 2019, RAJON GLOVER and D.E. met with an agent of the New Jersey State Police in the area of Colonial Avenue and West State Street, Trenton, New Jersey.

4. On February 25, 2019, RAJON GLOVER and D.E. sold a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, for \$200.00 in U.S. currency, to an agent of the New Jersey State Police.

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

(Unlawful Possession of a Rifle - Third Degree)

RAJON GLOVER

on or about February 25, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, without having first obtained a firearms purchaser identification card as provided in 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 THREE

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

RAJON GLOVER

on or about February 25, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell or dispose of a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, without being 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:39-9d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Unlawful Taking or Disposition - Third Degree)

RAJON GLOVER

on or about February 26, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, that is, money in an amount of \$550, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Certain Persons Not to Have Weapons - Second Degree)

RAJON GLOVER

on or about February 25, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of felony Aggravated Assault, in Philadelphia, Pennsylvania, on or about February 19, 2014, did own, possess, or control the following firearm: a Norinco SKS bolt action rifle, 7.62 caliber, bearing serial number 72100849, 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.

AAG Veronica Allende  
Director  
Division of Criminal Justice

*s/Cassandra Montalto*

By: SDAG Cassandra Montalto  
Deputy Chief  
Division of Criminal Justice

A TRUE BILL:

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Foreperson

Date: 3/16/2021