
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

DOMINIC MALONEY

:
:
: Honorable Lois H. Goodman
:
:
: Mag. No. 22-5009 (LHG)
:
:
: **CRIMINAL COMPLAINT**
:

I, Matthew L. LaVecchia, 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/ Matthew L. LaVecchia

Matthew L. LaVecchia, 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 June 9, 2022,
in the District of New Jersey

Honorable Lois H. Goodman
United States Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Engage in Firearms Trafficking)

In and around June 2022, in Mercer and Burlington Counties, in the District of New Jersey, and elsewhere, the defendant,

DOMINIC MALONEY,

did knowingly and intentionally conspire with others to commit an offense against the United States, namely, engaging in the business of dealing in firearms, while not being a licensed dealer, importer, or manufacturer of firearms, contrary to Title 18, United States Code, Section 922(a)(1)(A).

In violation of Title 18, United States Code, Section 371.

COUNT TWO

(Unlawful Transportation of Firearms in Interstate Commerce by an Individual Under Felony Indictment)

On or about June 8, 2022, in Salem County, in the District of New Jersey, and elsewhere, the defendant,

DOMINIC MALONEY,

while under indictment in the Superior Court of New Jersey, Mercer County, for a crime punishable by imprisonment for a term exceeding one year, did knowingly transport in interstate commerce, from the State of Georgia to the State of New Jersey, firearms, namely:

- (i) a Taurus, Model G3C, 9mm semiautomatic pistol, bearing serial number ADA845364;
- (ii) a Glock, model 19 Gen 4, 9mm semiautomatic pistol, bearing serial number BKZU016;
- (iii) a Glock, model 43, 9mm semiautomatic pistol, bearing serial number BKSW846;
- (iv) a Romarm/Cugir, model Draco, 7.62 caliber semiautomatic pistol, bearing serial number ROA22DG-6273;
- (v) a Ruger, .380 caliber semiautomatic pistol bearing serial number 380306912;
- (vi) a Taurus, model G3, 9mm semiautomatic pistol bearing serial number ACM633351;
- (vii) a Glock, model 17 Gen 4, 9mm semiautomatic pistol, bearing serial number BUND632;
- (viii) a Glock, model 19 Gen 4, 9mm semiautomatic pistol, bearing serial number BKPY728;
- (ix) a Marlin Firearms, model 70P, .22 caliber semiautomatic rifle, bearing serial number 11311294;
- (x) a Stevens, model 320, 12-gauge shotgun, bearing serial number V1509090; and
- (xi) a Mossberg, model 590, 12-gauge shotgun, bearing serial number 171120H,

In violation of Title 18, United States Code, Sections 922(n) and 2.

COUNT THREE
(Unlawful Transportation into State of Residence
Firearms Obtained in Another State)

On or about June 8, 2022, in Salem County, in the District of New Jersey, and elsewhere, the defendant,

DOMINIC MALONEY,

not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transport into the State in which he resided, namely, the State of New Jersey, firearms, namely,

- (i) a Taurus, Model G3C, 9mm semiautomatic pistol, bearing serial number ADA845364;
- (ii) a Glock, model 19, Gen 4, 9mm semiautomatic pistol, bearing serial number BKZU016;
- (iii) a Glock, model 43, 9mm semiautomatic pistol, bearing serial number BKSW846;
- (iv) a Romarm/Cugir, model Draco, 7.62 caliber semiautomatic pistol, bearing serial number ROA22DG-6273;
- (v) a Ruger, .380 caliber semiautomatic pistol bearing serial number 380306912;
- (vi) a Taurus, model G3, 9mm semiautomatic pistol bearing serial number ACM633351;
- (vii) a Glock, model 17, Gen 4, 9mm semiautomatic pistol, bearing serial number BUND632;
- (viii) a Glock, model 19, Gen 4, 9mm semiautomatic pistol, bearing serial number BKPY728;
- (ix) a Marlin Firearms, model 70P, .22 caliber semiautomatic rifle, bearing serial number 11311294;
- (x) a Stevens, model 320, 12-gauge shotgun, bearing serial number V1509090; and
- (xi) a Mossberg, model 590, 12-gauge shotgun, bearing serial number 171120H,

which he had purchased and obtained outside the State of New Jersey.

In violation of Title 18, United States Code, Sections 922(a)(3) and 2.

ATTACHMENT B

I, Matthew L. LaVecchia, 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 in 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. In June 2022, law enforcement conducted an investigation of unlawful firearms trafficking activities by defendant DOMINIC MALONEY and others. The investigation revealed that on or about February 22, 2022, MALONEY was indicted in the Superior Court of New Jersey, Mercer County, on felony charges of unlawful possession of a handgun; possession of a firearm for an unlawful purpose; aggravated assault; and making terroristic threats. As a result of the felony indictment, federal law prohibited MALONEY from transporting firearms in interstate. The investigation further revealed that MALONEY, a resident of the State of New Jersey, used a cellular telephone assigned a call number ending in 7408 (the “MALONEY 7408 Phone”), and that he maintained and used an identified Instagram account (the “Maloney Instagram Account”).

2. During the investigation, law enforcement reviewed publicly available posts on the Maloney Instagram Account and another Instagram account, which law enforcement identified as an account maintained and used by a co-conspirator not named as a defendant herein (“CC-1”) (the “CC-1 Instagram Account”). Based on the nature and contexts of the posts on the Maloney Instagram Account and the CC-1 Instagram Account, described below, law enforcement determined that MALONEY, CC-1, and others were unlawfully trafficking firearms in and around the State of New Jersey. Law enforcement’s review of the Maloney Instagram Account and the CC-1 Instagram Account further revealed that in June 2022, MALONEY traveled from the State of New Jersey to the State of Georgia for the purpose of obtaining firearms and that he intended to transport those firearms back to the State of New Jersey for the purpose of selling them to others for profit.

3. A summary of law enforcement’s review of publicly available posts on the Maloney Instagram Account and the CC-1 Instagram Account is set forth in paragraphs 3(a) through 3(g), below.

a. On or about May 26, 2022, law enforcement observed three video clips posted on the CC-1 Instagram Account. The first video clip depicted a black male holding a pistol and a white male holding up a cell phone behind the black

male. The second video clip was captioned “Glock 45 for sale.” The third video clip depicted two Glock pistols and a Ruger pistol with a gold-colored slide. The video clip depicted two prices over each of the firearms, specifically, \$750 and \$600 over the Glock pistols, and the hashtag “#notforsale” over the Ruger pistol.

b. On or about May 29, 2022, law enforcement observed a post on the Maloney Instagram Account, which bore the caption “I’m mobile 24/7 now. YKTS [You Know the Score] already I’m boutta have a whole new inventory.” The next day, on or about about May 30, 2022, law enforcement observed a post on the Maloney Instagram Account that read, “Get with me today nd tomorrow Wednesday I’m outta here for 10 days all gas I’m blessing people for FR [for real].” The same day, law enforcement observed a video on the CC-1 Instagram Account that depicted two Glock pistols with the caption, “First come first served 675 hit me Ian [I ain’t] holding nun for nobody.”

c. Two days thereafter, on or about June 1, 2022, law enforcement reviewed the Maloney Instagram Account observed a photograph of a Ruger pistol handle with a caption that read, “Get with me now I’m outta state this Wednesday.” Law enforcement also observed three separate video clips on the Maloney Instagram Account. The first video clip depicted luggage inside an airport with a United Airlines sign and a caption stating, “I’m out this bitch.” The second video clip depicted MALONEY in the passenger seat of a vehicle holding a pistol with a high-capacity extended magazine and another pistol with a high-capacity extended magazine laying on his lap. The caption of the video clip was “St. Marys, Georgia.” The third video clip depicted an additional firearm with a high-capacity drum magazine placed between the seat and MALONEY’s legs in the vehicle. The caption of the video clip was also “St. Marys, Georgia.”

d. Also on June 1, 2022, law enforcement reviewed the CC-1 Instagram Account and observed a post containing two separate video clips. The first video clip depicted a white male sitting in the rear passenger compartment—behind MALONEY—with two Glock pistols. The second video clip depicted MALONEY smoking in the front passenger seat with the firearm with the high-capacity drum magazine referenced above by his legs. The video clips were captioned, “Lol [Laugh out loud] pop out get popped at.

e. On or about June 2, 2022, law enforcement obtained a video depicting a post on the Maloney Instagram Account. The post contained four separate video clips. The first video clip was captioned “Everybody better get they trap up now kuz right when I touch back in jersey I got sun shit nobody goin have these prices boutta fuck up the game 100%.” The second video clip was captioned “you will never see me unless I want you to see me lol [laugh out loud].” The third video clip depicted multiple guns in gun cases in a gun shop, one with a distinct

yellow backing and a wall with multiple firearms mounted to it. The fourth video clip depicted MALONEY firing an AK-style pistol in a wooded area.

f. Also on or about June 2, 2022, law enforcement observed a post on the CC-1 Instagram Account that contained three separate video clips. The first video clip depicted the same gun shop with the same gun cases and wall-mounted firearms that MALONEY had posted on the Maloney Instagram Account, as referenced in paragraph 3(e), above. The second video clip depicted a white male sitting in the rear passenger compartment of a vehicle, manipulating a white Glock pistol with a laser sight and mounted flashlight. The third video clip depicted four pistols, including the white Glock, a gun box and multiple magazines laid out in the rear passenger compartment of a vehicle. Law enforcement also observed an additional post on the CC-1 Instagram Account containing four separate video clips. The first two video clips were the same as the first and third videos from the previous review. The third video clip depicted a white male with a large tattoo on his right arm firing the white Glock in the same wooded area where MALONEY had been firing the AK-style pistol. The fourth video clip depicted five pistols, the AK-style pistol, an AR-style rifle, a gun box, multiple magazines and ammunition laid out on the ground of the wooded area. Later the same day, law enforcement observed another post on the CC-1 Instagram Account, which contained a video clip depicting a white male manipulating a Glock, model 43, 9mm pistol, captioned “850\$ Glock 43slim line.”

g. On or about June 3, 2022, law enforcement observed a post on the CC-1 Instagram Account containing two side-by-side photographs. One photograph depicted a white male holding a pistol and another white male wearing a black and gray hooded sweatshirt holding the AK-style pistol. The second photograph depicted MALONEY and the white male wearing the black and gray hooded sweatshirt holding multiple firearms. There also was a FaceTime video call captured in the picture depicting a black male holding a firearm. The post was captioned “Come Run” with two Instagram users tagged in the post.

4. On or about June 8, 2022, law enforcement identified a silver 2007 Nissan Armada (the “Armada”) driving northbound on Interstate 95 in the State of Maryland, in which MALONEY was a passenger. Thereafter, law enforcement effected a traffic stop of the vehicle on Interstate 295 after it passed from the State of Delaware into the State of New Jersey. Upon effecting the stop, law enforcement encountered in the Armada a female driver (to whom the Armada was registered, and whom is referred to hereafter as CC-2, not charged as a defendant herein); MALONEY sitting in the front passenger’s seat; CC-1 sitting in the rear passenger’s-side seat; and a minor child sitting in the rear driver’s-side passenger seat. Following the stop, law enforcement obtained consent from CC-2 to search the Armada.

5. Law enforcement subsequently searched the Armada, and recovered, among other things, eleven firearms (the "Firearms") from the trunk of the vehicle, identified as follows:

- (i) a Taurus, Model G3C, 9mm semiautomatic pistol, bearing serial number ADA845364;
- (ii) a Glock, model 19, Gen 4, 9mm semiautomatic pistol, bearing serial number BKZU016;
- (iii) a Glock, model 43, 9mm semiautomatic pistol, bearing serial number BKSU846;
- (iv) a Romarm/Cugir, model Draco, 7.62 caliber semiautomatic pistol, bearing serial number ROA22DG-6273;
- (v) a Ruger, .380 caliber semiautomatic pistol bearing serial number 380306912;
- (vi) a Taurus, model G3, 9mm semiautomatic pistol bearing serial number ACM633351;
- (vii) a Glock, model 17, Gen 4, 9mm semiautomatic pistol, bearing serial number BUND632;
- (viii) a Glock, model 19, Gen 4, 9mm semiautomatic pistol, bearing serial number BKPY728;
- (ix) a Marlin Firearms, model 70P, .22 caliber semiautomatic rifle, bearing serial number 11311294;
- (x) a Stevens, model 320, 12-gauge shotgun, bearing serial number V1509090; and
- (xi) a Mossberg, model 590, 12-gauge shotgun, bearing serial number 171120H.