

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

**FILED**

SEP 11 2019

Case No.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA

United States of America  
v.  
RAYMOND DEJUAN SHINE

**MAG 19**

**349**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 28, 2019, in the county of Jefferson in the  
Northern District of Alabama, the defendant(s) violated:

Code Section

Offense Description

Title 18 U.S.C. Section 922(g)(1)

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possess in a firearm, that is, a Mossberg, model 715T, 22 caliber semi-automatic rifle, and the firearm was in and affecting commerce. SHINE has at least one prior felony conviction, see attached affidavit, the said offenses being a crimes punishable by imprisonment for a term exceeding one year.

This criminal complaint is based on these facts:

See Attached Affidavit of 

Continued on the attached sheet.

  
\_\_\_\_\_  
Signature  
 ATF/TPO  
\_\_\_\_\_  
Printed name and title

Sworn to before me and signed in my presence.

Date: September 11, 2019 @ 4:46 PM

  
\_\_\_\_\_  
Judge's signature

City and state: Birmingham, ALABAMA

John E. Ott United States Magistrate Judge  
\_\_\_\_\_  
Printed name and title

**Attachment A**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

Comes now your Affiant, Task Force Officer (TFO) [REDACTED], of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), being first duly sworn, hereby depose and state as follows:

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to make arrests for the offenses enumerated in Title 18, 21, and 26, United States Code. I have been an ATF TFO since [REDACTED]. I have approximately ten (10) years of law enforcement experience. Prior to my assignment by [REDACTED] Police Department with the ATF, I was assigned to the Neighborhood Enforcement Team (NET) as a Detective. Prior to that, I was assigned to the [REDACTED] Police Department [REDACTED] Precinct as a patrol officer. I worked as a patrol officer for approximately six (6) years, and during my experience as a patrol officer, I worked traffic stops involving firearms and drugs on a weekly basis, including investigations involving cocaine, marijuana, ecstasy, and heroin. I have completed the Alabama Peace Officers Standards and Training Commission (APOST). Throughout my career, I have received specialized training in investigative techniques, surveillance techniques, along with specific training regarding firearms trafficking and drug trafficking.

2. Your Affiant’s current duties and responsibilities as an ATF TFO include investigating violations of federal firearms laws. This includes investigations pertaining to violations of Title 18, United States Code, Section 922(g)(1) (Possession of a Firearm by a Prohibited Person-Felon) and Title 18, United States Code, Section 922(j) (Possession of a stolen firearm).

3. This Affidavit is made in support of a criminal complaint against Raymond Dejuan **SHINE** (B/M, DOB: [REDACTED]). This affidavit does not include all facts known to me concerning the investigation; rather, it contains sufficient information for the limited purpose of establishing probable cause. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another law enforcement officer, who had either direct or hearsay knowledge of the statement, to whom I have spoken or whose report I have read and reviewed. Such statements are stated in substance, unless otherwise indicated. Wherever in this affidavit I state a belief, that belief is based upon my training and experience and the information obtained through this investigation.

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**PROBABLE CAUSE**

4. On July 28, 2019, at approximately 9:45 p.m., Birmingham Police Officers were dispatched on a call of a shooting at [REDACTED] 67<sup>th</sup> Court South. Upon arrival, officers found that a (4) four-year old female had an apparent gunshot wound to the head. Officers notified the Birmingham Homicide Unit and Detective [REDACTED] with the Birmingham Police Homicide Unit responded to the scene. Detective [REDACTED] interviewed the 4 year old victim's father Michael Coleman. Colman told Detective [REDACTED] that his first cousin, **SHINE**, came to his residence in a black Jeep with no doors via the alleyway. Coleman stated that **SHINE** exited the Jeep and grabbed his arm and stated "you think it's a game?" and pointed a firearm in his face. Coleman told Detective [REDACTED] that once **SHINE** pointed the firearm at him he took off running. Once he took off running **SHINE** began shooting. Coleman stated that while trying to flee he ran past the apartment where his daughter was located. Detective [REDACTED] presented a photo lineup to Colman who identified **SHINE** as the shooter.

5. During the investigation, officers interviewed a witness that stated he observed a black or blue Jeep with short doors and no windows fleeing the scene with a flat tire. Officers published a Be on the Lookout (BOLO) for a black or blue Jeep with a flat tire on the passenger side.

6. On July 29, 2019, at approximately 12:20 a.m., Birmingham Police Officers [REDACTED] and [REDACTED] were assisting Officer [REDACTED] on a call at [REDACTED]. While assisting, Officer [REDACTED] observed an AAA Wrecker Service tow truck preparing to tow a black Jeep Wrangler. The Jeep Wrangler officers observed matched the description of the suspect vehicle from the shooting incident that occurred at [REDACTED] 67<sup>th</sup> Court South.

7. Continuing on July 29, 2019, Officers [REDACTED] and [REDACTED] drove to where the Jeep Wrangler was located in their marked patrol unit to investigate further. The Jeep was located in front of an apartment complex located at [REDACTED]. The Jeep was parked in front of apartment D. Upon arrival, Officers [REDACTED] and [REDACTED] observed a black male sitting in the driver's seat of the Jeep and another black male standing along the driver side of the tow truck.

8. Officers approached the individuals to conduct a field interview and investigate the vehicle matching the BOLO. Officers spoke to the individual located in the driver's seat of the Jeep. The individual identified himself to officers as [REDACTED]. [REDACTED] was detained while officers were investigating the vehicle. Officers then detained the second individual who was standing on the driver side of the tow truck. The second individual would not identify himself to officers. Officers later identified him as **SHINE**. While investigating officers observed a firearm in plain view located in the front passenger seat of the Jeep. Officers remained on scene, until the vehicle was towed by Weil Wrecker to Weil Wrecker's secure lock up. A third individual identified as [REDACTED] was located in a vehicle adjacent to the Jeep and was

detained by officers. The three suspects were transported to the Birmingham Police Department Headquarters to be interviewed by Detective [REDACTED].

9. Continuing on July 29, 2019, Detectives with the Birmingham Police Department obtained a state search warrant for the Jeep Wrangler and **SHINE**'s residence located at [REDACTED] [REDACTED] Birmingham, Alabama apartment D. During the execution of the state search warrant, pertaining to the Jeep, officers recovered a purple and black, Walther CCP 9mm pistol, serial number [REDACTED], from the front passenger seat. During the execution of the state search warrant on **SHINE**'s residence, officers recovered a Mossberg, 715T .22 caliber rifle serial number [REDACTED] from a hallway closet.

10. Later, your Affiant conducted a review of **SHINE**'s criminal history and discovered that he has felony convictions in the state of Alabama for Possession of Cocaine, Date of Conviction 4/27/2007; Assault 2<sup>nd</sup> Degree, Date of Conviction 10/16/2006; and Assault 2<sup>nd</sup> Degree, Date of Conviction 10/6/2006. Your Affiant then obtained records relating to **SHINE**'s felony conviction of Possession of a Controlled Substance to include an explanation of rights and plea of guilty form signed by **SHINE**. Based on the certified convictions received, your Affiant has reason to believe that **SHINE** is aware that he is a convicted felon and thus is prohibited from possessing firearms.

11. As the investigation continued, your Affiant continuously monitored the Jefferson County jail call system. While monitoring this system, your Affiant discovered a conversation that took place on August 1, 2019 at around 7:00 p.m. between **SHINE** and [REDACTED]. During this conversation, **SHINE** can be heard asking [REDACTED] if [REDACTED] got the "AR out of the apartment." Your Affiant knows that "AR" is a term used by individuals to describe rifles and/or AR-style pistols. [REDACTED] responded that "They got it," referring to the firearm recovery by

law enforcement. SHINE then asked "Who?" [REDACTED] responded, "The police," confirming that [REDACTED] was notifying SHINE about law enforcement's recovery of the firearm.

**AUTHORIZATION REQUEST**

12. Based on the foregoing, your Affiant opines that there is probable cause to suggest that on July 29, 2019, Raymond SHINE, a previously convicted felon, was knowingly in possession of a firearm, to wit; a Mossberg, 715T .22 caliber rifle, serial number [REDACTED]. ATF Special Agent [REDACTED], examined the said firearm and determined that it was manufactured outside the State of Alabama and therefor was in and affected commerce. The said firearm was also determined to function properly by the Birmingham Police Department Firearm and Tool Mark Unit. SHINE's possession of this firearm thus violates Title 18, United States Code, Section 922(g)(1) (Possession of a Firearm by a Prohibited Person- Felon).

The foregoing facts are true to the best of your Affiant's knowledge and belief.

[REDACTED]  
\_\_\_\_\_  
[REDACTED], Task Force Officer

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me this 11th day of September, 2019.



UNITED STATES MAGISTRATE JUDGE  
NORTHERN DISTRICT OF ALABAMA