

United States District Court
District of New Jersey

ORIGINAL FILED
OCT 22 2012

UNITED STATES OF AMERICA : Hon. Patty Shwartz
v. :
EDUARDO VELASQUEZ : Magistrate No. 12-3165 (PS)
: CRIMINAL COMPLAINT

PATTY SHWARTZ
U.S. MAG. JUDGE

I, Douglas Man, the undersigned complainant being duly sworn, state 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 Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

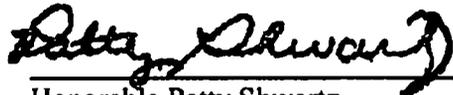
Douglas Man,
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

October 22, 2012 _____
Date

at

Newark, New Jersey _____
City and State



Honorable Patty Shwartz
United States Magistrate Judge

ATTACHMENT A

Count One – Unlawful Dealing in Firearms

From on or about July 5, 2012 through on or about October 18, 2012, in Hudson County, in the District of New Jersey and elsewhere, defendant

EDUARDO VELASQUEZ

knowingly and willfully engaged in the business of dealing in firearms without being a licensed dealer.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

Counts Two through Six – Unlawful Sale of Firearms

On or about the dates set forth below, in Hudson County, in the District of New Jersey and elsewhere, defendant

EDUARDO VELASQUEZ,

not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector, did knowingly and willfully transfer, sell, trade, give, transport, and deliver a firearm to a person who he knew and had reasonable cause to believe did not reside in his state of residence.

Count	Date	Firearm(s)
2	7/5/12	<ul style="list-style-type: none">• Smith & Wesson .41 caliber revolver
3	7/25/12	<ul style="list-style-type: none">• Maverick Mossberg Model 88 shotgun• SKS 7.52 x 39 mm rifle
4	8/8/12	<ul style="list-style-type: none">• Ruger 9 mm semi-automatic handgun• High-caliber revolver
5	9/20/12	<ul style="list-style-type: none">• Winchester Model 1300 12-gauge shotgun• Taurus PT917 CS 9 mm semi-automatic pistol• Desert Eagle .44 caliber semi-automatic pistol
6	10/18/12	<ul style="list-style-type: none">• Smith and Wesson SW99 .40 caliber handgun• Mossberg 190 16-gauge shotgun• Norinco SKS 7.62 x 39 mm rifle

In violation of Title 18, United States Code, Sections 922(a)(5).

ATTACHMENT B

I, Douglas Man, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge about the facts set forth below from my involvement in the investigation, review of reports and documents, and discussions with other law enforcement officials. Where statements of others are related herein, they are related in substance and 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. From on or about July 5, 2012, through on or about October 18, 2012, on five separate occasions, defendant EDUARDO VELASQUEZ sold firearms to a confidential source ("CS") for cash. Each sale took place in Jersey City, New Jersey. At all times relevant to this Complaint, VELASQUEZ resided in Pennsylvania and the CS resided in New Jersey.
2. On July 5, 2012, VELASQUEZ traveled to New Jersey and sold to the CS a Smith and Wesson .41 caliber revolver for \$700. VELASQUEZ also informed the CS that he would be able to provide the CS with long guns such as double-barrel shotguns and military rifles. VELASQUEZ also told the CS that he often ships firearms to the Dominican Republic.
3. On July 25, 2012, for \$1,500, VELASQUEZ traveled to New Jersey and sold to the CS a SKS 7.52 x 39 mm rifle with serial number 93-65552 along with two high-capacity magazines and 66 rounds. Additionally, VELASQUEZ provided the CS with one Maverick Mossberg Model 88 shotgun with serial number MV875B2E. VELASQUEZ stated that he expected to be paid \$600 by the CS for this shotgun, at a later date.
4. On August 8, 2012, VELASQUEZ traveled to New Jersey and received from the CS the \$600 owed to him for the prior sale of the Maverick Mossberg Model 88 shotgun. Additionally, VELASQUEZ sold to the CS (a) a high-caliber revolver with serial number 32-47252 for \$500; and (b) a Ruger 9 mm semi-automatic handgun with serial number 331-47218 and one magazine containing 13 ball rounds and 4 hollow-point rounds of ammunition for \$500. VELASQUEZ stated that he expected to be paid an additional \$300 at the next transaction for the aforementioned Ruger 9 mm handgun. Additionally, the Ruger 9 mm handgun was reported as stolen.
5. On September 20, 2012, VELASQUEZ traveled to New Jersey and sold to the CS: (a) a silver-plated Winchester Model 1300 Stainless Marine 12-gauge shotgun with serial number L2331701; (b) a silver-plated Taurus PT917 CS 9 mm semi-automatic pistol with serial number TDP 27748; and (c) a Desert Eagle .44 caliber semi-automatic pistol with serial number 95257552, along with one magazine and one .44 caliber round. VELASQUEZ was paid \$100 in cash and expected \$2,900 to be wired to him on September 21, 2012. VELASQUEZ stated that he would use the cash to purchase more firearms to sell to the CS. On September 21, 2012, at VELASQUEZ's direction, the CS paid the \$2,900 in cash to VELASQUEZ's daughter.

6. On October 18, 2012, VELASQUEZ traveled to New Jersey and sold to the CS: (a) a Smith and Wesson SW99 .40 caliber handgun with serial number SSAF3533; (b) a Mossberg 190 16-gauge shotgun; and (c) a Norinco SKS 7.62 x 39 mm rifle with serial number 21001320. VELASQUEZ expected the CS to pay his daughter \$2,100 at a later date in exchange for these guns.