
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable James B. Clark, III
 :
 CARLO M. DE LEON DE JESUS : Mag. No. 23-12192
 :

I, Anthony Santorelli, 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 Bureau of Alcohol, Tobacco, Firearms and Explosives and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

Anthony Santorelli /s/ Anthony Santorelli

Anthony Santorelli, Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Attested to me by telephone pursuant to F.R.C.P. 4.1(b)(2)(A),
on this 28th day of September 2023, in the District of New Jersey.

Honorable James B. Clark, III
United States Magistrate Judge

/s/ Honorable James B. Clark III

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Dealing Firearms Without a License)

From at least in or around July 2023 through in or around September, in Essex County, in the District of New Jersey and elsewhere, the defendant,

CARLO M. DE LEON DE JESUS,

not being a licensed dealer in firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, or in the course of such business, did transport a firearm in interstate commerce.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D).

COUNT TWO
(Transferring Firearms to an Out-of-State Resident)

Between in or around July 2023 and in or around September 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

CARLO M. DE LEON DE JESUS,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transport firearms, namely, a (i) Glock 19 pistol bearing serial number AEF317; (ii) an Extreme Gun Works X15, short barrel, 5.56 caliber, rifle bearing serial number X15-00211; (iii) a Century Arms International AK variant style rifle bearing serial number RC8634; and (iv) one Beretta ARX 160, .22 LR semi-automatic handgun bearing serial number PB010073 to another person, said person not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the State of New Jersey, the State in which the defendant was residing at the time of the transfer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

COUNT THREE
(Firearms Trafficking)

From in or around July 2023 through in or around September 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

CARLO M. DE LEON DE JESUS,

did knowingly and willfully ship, transport, transfer, cause to be transported, and otherwise dispose of firearms to another person in and otherwise affecting interstate and foreign commerce, knowing and with reason to believe that the use, carrying, and possession of firearms by the recipient would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

COUNT FOUR
(Conspiracy to Distribute Controlled Substances)

In or around August 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

CARLO M. DE LEON DE JESUS,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Anthony Santorelli, 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, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Where I refer to the contents of previously recorded conversations (e.g., consensual recordings or prior wiretap interceptions), quotations and descriptions are based on preliminary draft transcripts and/or translations of those conversations. 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 or around July 2023, the ATF initiated an investigation into the trafficking of firearms in and around Essex County, New Jersey and elsewhere. During that investigation, law enforcement identified Carlo M. De Leon De Jesus (“De Jesus”) as a trafficker of firearms. From July 2023 through September 2023, law enforcement conducted at least three controlled purchases from De Jesus, which resulted in the recovery of four firearms (collectively, the “Firearms”). All of the controlled purchases that are summarized herein were captured by audio-recording devices. During two of those controlled purchases, De Jesus also sold or coordinated the sale of fentanyl and cocaine.

2. A federal firearms license (“FFL”) is required for any individual or business to operate as a dealer, importer, or manufacturer of firearms. The Federal Firearms Licensing Center, an arm of the ATF, processes FFL applications and maintains the Firearms Licensing System, which contains records regarding approved FFLs. Based on law enforcement’s queries of the Firearms Licensing System, De Jesus has not received an FFL, and he is accordingly not licensed as a dealer, importer, or manufacturer of firearms.

3. On or about July 6, 2023, a confidential law enforcement source (the “CS”) met with De Jesus near his girlfriend’s residence in Newark, New Jersey (the “Newark Residence”) to purchase a firearm. During the meeting, the CS purchased a Glock 19 pistol bearing serial number AEFF317 (the “Glock 19”), from De Jesus in exchange for \$1,500 in cash. Law enforcement has confirmed the operability of the Glock 19.

4. On or about August 28, 2023, the CS met with De Jesus again near the Newark Residence to purchase firearms and narcotics. During the meeting, the CS purchased an Extreme Gun Works X15, short barrel, 5.56 caliber rifle bearing serial number X15-00211 (the “X15”) and a Century Arms International AK variant style rifle bearing serial number RC8634 (the “AK”), from De Jesus in

exchange for \$5,500 in cash. Law enforcement confirmed the operability of both the X15 and the AK. During the same buy, the CS also purchased approximately 24 grams of a substance that field-tested positive for fentanyl and approximately 19 grams of a substance that field-tested positive for cocaine in exchange for \$1,110 in cash.

5. During the purchase of firearms and narcotics that occurred on or about August 28, 2023, De Jesus indicated to the CS through telephone conversation the intention to sell the CS narcotics. Shortly after De Jesus delivered the AK to the CS, another individual with whom De Jesus coordinates delivered the narcotics to the CS, demonstrating the agreement between De Jesus and others to distribute narcotics.

6. On or about September 11, 2023, the CS met with De Jesus again at a location near Mt. Prospect Avenue in Newark, New Jersey (the "Mt. Prospect Ave. Location") to purchase a firearm and narcotics. During the meeting, the CS purchased a Beretta ARX 160, .22 LR semi-automatic handgun bearing serial number PB010073 (the "ARX") from De Jesus in exchange for \$2,400 in cash. Law enforcement confirmed the operability of the ARX. During the same buy, the CS also purchased approximately 53 grams of a substance that field-tested positive for fentanyl in exchange for \$1,600 in cash.

7. The Firearms that the CS purchased from De Jesus were manufactured outside the State of New Jersey, and thus traveled in interstate commerce prior to De Jesus having possession of them in New Jersey during each of the controlled Firearm purchases which occurred between on or about July 6, 2023, August 28, 2023, and September 11, 2023.

8. During each of those controlled Firearm purchases, De Jesus held a New Jersey driver's license and resided in New Jersey and transferred the Firearms to the CS after being told that the CS was a resident of Connecticut.