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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**UNITED STATES OF AMERICA**        :       **CRIMINAL COMPLAINT**  
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  :       **Mag. No. 22-9169**  
  :       :  
**HUNTER WEEKS**                    :       :

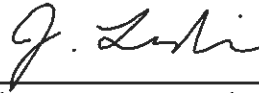
I, Joshua R. Leslie, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.




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Postal Inspector Joshua R. Leslie  
United States Postal Inspection Service

SA Leslie attested to this Complaint via telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A))

Sworn to me telephonically  
On this 7th day of April, 2022

  
\_\_\_\_\_  
Honorable Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**  
**(Conspiracy to Unlawfully Transport Firearms)**

From in or around February 2021 through in or around July 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant

**HUNTER WEEKS**

not being a licensed importer, manufacturer, or dealer, did knowingly and intentionally conspire and agree with others, known and unknown, to engage in the business of dealing in firearms and, in the course of such business, shipped and transported firearms in interstate commerce, including, but not limited to, the following: a Glock firearm, an Uzi firearm, and an AR-15 firearm, contrary to Title 18, United States Code, Section 922(a)(1)(A).

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

**COUNT TWO**  
**(Possession of an Unregistered Firearm)**

From in or around February 2021 through in or around July 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant

**HUNTER WEEKS**

knowingly possessed a firearm as defined in 26 U.S.C. § 5845(a), namely an Uzi firearm, and which firearm was not registered to defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(d).

**COUNT THREE**  
**(Transportation of an Unregistered Firearm)**

From in or around February 2021 through in or around July 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant

**HUNTER WEEKS**

knowingly transported in interstate commerce a firearm as defined in 26 U.S.C. § 5845(a), namely an Uzi firearm, and which firearm was not registered to defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(j).

## **ATTACHMENT B**

I, Joshua R. Leslie, have been a Postal Inspector with the United States Postal Inspection Service (“USPIS”) for approximately 5 years and am currently assigned to the Contraband Interdiction and Investigations Group. During my employment I have been trained in various aspects of law enforcement, including the investigations of darknet marketplaces, cryptocurrencies, and narcotics and firearms offenses. 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 evidence. Where statements of others are related herein, they are related in substance and part. 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. 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.

### **Background**

1. Starting in or around August 2020, USPIS began conducting an undercover operation on the social media platform Telegram.<sup>1</sup> Several channels were identified as selling narcotics, including “TMO Drug Menu” and “@IllPhil’s Drug Menu” which advertised the sale of various types of illegal drugs, including heroin and various pills.

2. Law enforcement determined that Angelo Chavez (“Chavez”) was the administrator of “TMO Drug Menu” and used the handle “TrapMarketOfficial” and that Phillip Luevano (“Luevano”) was the administrator of “@IllPhil’s Drug Menu” and used the handle “The Illest.” In addition to offering various drugs for sale, Chavez also advertised the sale of various firearms on his TrapMarketOfficial Telegram page.

3. In or around August 2020, an undercover law enforcement agent (the “UC”) made contact with Chavez and Luevano. From in or around August 2020 through in or around December 2021, the UC bought numerous quantities of various controlled substances and firearms from Chavez and Luevano.<sup>2</sup>

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<sup>1</sup> Telegram is an encrypted cloud-based instant messaging, video calling, and VoIP (Voice over Internet Protocol) service which allows users to send messages, photos, videos, and files, and created groups for broadcasting to an unlimited number of Telegram users. All of the conversations described below occurred over Telegram (unless otherwise noted).

<sup>2</sup> Chavez and Luevano were charged in an Amended Criminal Complaint (22-10112) with Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine and Fentanyl and Conspiracy to Unlawfully Transport Firearms (among other crimes). They were arrested in California on March 22, 2022.

4. As described below, law enforcement determined that the Defendant Hunter Weeks (“WEEKS”) used the moniker “Jacob” on Telegram.

5. All of the purchases described below were made with Bitcoin, which was sent through Crypto Currency Exchange-1, unless otherwise noted.

6. The purchases described below were sent to two different New Jersey addresses (“NJ Address-1” and “NJ Address-2”).

7. WEEKS did not have a license to deal in or transport the firearms described below. In addition, the Uzi firearm described below was not registered to WEEKS in the National Firearms Registration and Transfer Record.

### **Undercover Purchases of Firearms from WEEKS**

8. In or around February 2021, Chavez stated he had a Glock firearm with an auto sear switch<sup>3</sup> available to purchase. The UC purchased the firearm (“Parcel 1”), which was sent from an address in Pueblo West, Colorado (the “Pueblo West Address”) to NJ Address-1. Fingerprints matching WEEKS’s fingerprints were found on the packaging materials of Parcel 1.

9. In or around June 2021, WEEKS, using the moniker “Jacob,” posted in the TMO Drugs Telegram chat stating that he had an Uzi for sale. Chavez replied “Vouch,” indicating that WEEKS was a trusted seller. The UC replied to WEEKS’s posting and indicated that he was interested in purchasing the Uzi. The UC subsequently purchased the firearm, which was shipped to NJ Address-2 from the Pueblo West Address. The firearm (“Parcel 2”) was received by the UC and was found to have been assembled with a machine gun receiver and Uzi-style machine gun parts, allowing it to function as an open-bolt, magazine-fed machine gun. A fingerprint matching WEEKS’s fingerprint was found on a piece of bubble wrap found inside Parcel 2.

10. During the above-described purchase of the Uzi firearm, WEEKS indicated, via Telegram, that, due to cryptocurrency fees, he did not receive the full \$3500, which was the agreed-upon purchase price for the Uzi. WEEKS stated that the UC could pay the remaining \$200 via Zelle, a digital payment service. WEEKS provided telephone number (719) 565-8316 (the “8316 Number”) as WEEKS’s telephone number in order to verify the Zelle account. The 8316 number is registered to WEEKS with a post office box address in Colorado Springs, Colorado (the “Colorado Springs Address”).

11. In or around July 2021, WEEKS offered to sell the UC an AR-15 pistol. The UC purchased the firearm (“Parcel 3”) which was shipped from the Pueblo West Address to NJ Address-2. A fingerprint matching WEEKS’s

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<sup>3</sup> An auto sear switch converts a semi-automatic firearm into a fully-automatic firearm.

fingerprint was found on a piece of bubble wrap found inside Parcel 3.

12. During the above-described purchase of the AR-15 firearm, WEEKS told the UC that the UC could send U.S. Currency through the mail. WEEKS stated that the money could be addressed to Hunter Weeks and sent to the Colorado Springs Address.