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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Mark Falk  
v. : Mag. No. 11-3766  
LEON JENKINS :  
: CRIMINAL COMPLAINT

I, Jeffrey Kidder, 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 ("FBI") and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Jeffrey Kidder  
Special Agent, Federal Bureau of Investigation

Sworn to before me and  
subscribed in my presence,  
October 26, 2011, at Newark, New Jersey



HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

Count One

From in and around October 2010 through in and around April 2011, in Essex County, in the District of New Jersey, and elsewhere, defendant

LEON JENKINS

did knowingly and willfully engage in the business of dealing in firearms without having a license to do so and, in the course of such business, shipped, transported and received firearms in interstate and foreign commerce.

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

## ATTACHMENT B

I, Jeffrey Kidder, am a Special Agent with the FBI. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Where statements of others are set forth herein, these statements are related in substance and in 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.

1. From in and around October, 2010, through in and around April 2011, a reliable confidential informant (hereinafter "the CI"), at the direction and under the supervision of law enforcement, purchased firearms from defendant LEON JENKINS ("JENKINS").

### The October 17-18 Sales of a Romarm WASR-10 Rifle and .44 Caliber Taurus Revolver.

2. On or about October 17, 2010, defendant JENKINS and the CI saw each other at an apartment on South Munn Avenue in Newark, Essex County, New Jersey ("South Munn Premises"), which was later determined to be defendant JENKINS's residence. During the visit, defendant JENKINS gave the CI a Romarm WASR-10 Rifle, bearing serial number 1-14093 in exchange for a sum of money that the CI gave to defendant JENKINS. The CI was short \$100 and defendant JENKINS instructed the CI, in substance and in part, to give JENKINS the remaining amount of money the following day when JENKINS would have another firearm to sell to the CI.

3. On or about October 18, 2010, defendant JENKINS called the CI on the telephone to inform him that JENKINS had another firearm to sell. Later that day, the CI arrived at the South Munn Premises to purchase the firearm from defendant JENKINS. The CI gave JENKINS the remaining \$100 for the Romarm WASR-10 Rifle he had received from JENKINS the night before. The CI also gave JENKINS money for a .44 caliber Taurus revolver, bearing serial number LB584487 that JENKINS gave to the CI upon entering the apartment. JENKINS counted the money for both guns and the CI departed with the firearm to meet law enforcement to turn over the evidence. The October 18, 2010 transaction was audio and video recorded.

### The November 3, 2010 Sale of a Romarm Carpati 380 Caliber Handgun

4. On or about November 3, 2010, defendant JENKINS called the CI to inform him that JENKINS had a firearm for sale. Later that day, the CI arrived at the South Munn Premises to purchase the firearm. The CI entered the South Munn Premises and counted the money and handed it to JENKINS, who in turn, handed a Romarm Carpati 380 caliber handgun, bearing serial number A2843 to the CI. The CI examined the firearm and departed with it to meet law enforcement to turn over the evidence. The November 3, 2010 transaction was audio and video recorded.

The December 2, 2010 Sale of a .38 caliber Charter Arms Undercover Revolver

5. On or about December 1, 2010, the defendant JENKINS called the CI to inform him that he had a firearm for sale and also to ask the CI to pick him up from the hospital. Later that day, the CI picked up JENKINS from the hospital. The CI and JENKINS drove back to the South Munn Premises together from the hospital. JENKINS gave the CI a .38 caliber Charter Arms Undercover revolver, bearing serial number 144258. The CI, in turn, paid a sum of money to JENKINS for the firearm. The CI and JENKINS briefly discussed details of another gun purchase and the CI departed from the South Munn Premises to meet law enforcement to turn over the evidence. The December 2, 2010 transaction was audio and video recorded.

The February 10, 2011 Sale of a Cobray SM11-A1 Semi-Automatic Pistol

6. On or about February 10, 2011, defendant JENKINS called the CI to inform him that he had another firearm for sale. Later that day, the CI arrived at the South Munn Premises where he met with JENKINS to purchase the firearm. The CI gave JENKINS a sum of money, and JENKINS, in turn, handed to the CI a Cobray SM11-A1 semi-automatic pistol, bearing serial number SAP3806374. JENKINS counted the money and then the CI departed from the South Munn Premises to meet law enforcement to turn over the evidence. The February 10, 2011 transaction was audio and video recorded.

The March 15, 2011 Sale of a 9 mm Standard Arms SA-9 Pistol

7. On or about March 15, 2011, defendant JENKINS called the CI to inform him that he had a firearm for sale. Later that day, the CI arrived at a location in Newark, Essex County, New Jersey, to purchase the firearm from JENKINS. The CI parked his vehicle in the parking lot of a housing complex at that location and JENKINS entered the CI's vehicle. During conversation, the CI paid a sum of money to JENKINS and JENKINS, in turn, handed a 9 mm Standard Arms SA-9 pistol, bearing serial number 04261 to the CI. JENKINS left the vehicle and the CI departed with the firearm to meet law enforcement to turn over the evidence. The March 15, 2011 transaction was audio and video recorded.

The March 17, 2011 Sale of a 9 mm Ruger and Co. Semi-Automatic Pistol

8. On or about March 17, 2011, defendant JENKINS called the CI to inform him that he had a firearm for sale. Later that day, the CI arrived in the parking lot of the South Munn Premises to purchase the firearm from JENKINS. JENKINS entered the CI's vehicle and the CI paid JENKINS a sum of money for the firearm. JENKINS, in turn, handed a 9mm Sturm Ruger and Co. semi automatic pistol with an obliterated serial number to the CI. JENKINS left the vehicle and the CI departed with the firearm to meet law enforcement to turn over the evidence. The March 17, 2011 transaction was audio and video recorded.

9. Each of the firearms described above in paragraphs 2, 3, 4, 5, 6, 7 and 8 is a weapon that will, is designed to, and may readily be converted to expel a projectile by the action of an explosive, within the meaning of 18 U.S.C. § 921(a)(3).

10. All of the firearms described in paragraphs 2, 3, 4, 5, 6, 7 and 8 were manufactured outside of New Jersey.

11. A database search confirmed that defendant JENKINS did not have a federal firearms license and was not otherwise licensed to deal in firearms at all times relevant to this Complaint.