

FILED
12/9/2024
TDTHOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANTHONY NEE AMOO

CASE NUMBER: 24 CR 564

~~UNDER SEAL~~**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning on or about October 6, 2020, through on or about November 25, 2024, in the Northern District of Illinois, Eastern Division, and elsewhere, NEE AMOO (s) violated:

*Code Section*Title 18, United States Code, Section
554(a)*Offense Description*

willfully and fraudulently exported and sent from the United States the following merchandise, articles, and objects, namely firearms, contrary to a law and regulation of the United States, namely Title 50, United States Code, Section 4819, and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774 Supp. No. 1

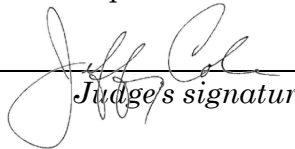
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ALEXANDRA LISS

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 9, 2024 1:45pm
*Judge's signature*City and state: Chicago, IllinoisJEFFREY COLE, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, ALEXANDRA LISS, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (“ATF”), and have been so employed since approximately July 2022. I am responsible for the investigation of federal firearms offenses, including international firearms trafficking.

2. This affidavit is submitted in support of a criminal complaint alleging ANTHONY NEE AMOO violated Title 18, U.S. Code, Section 554(a) by willfully exporting firearms from the United States to the Republic of Ghana (“Ghana”) contrary to Title 50, U.S. Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774 Supp. No. 1.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging NEE AMOO with violating Title 18, U.S. Code, Section 554(a), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause that NEE AMOO committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, my training and experience, and information provided to me by various law enforcement personnel and witnesses.

The Export Control Reform Act of 2018

5. It is illegal to export dual-use items (i.e., items with civilian and military, terrorism, weapons of mass destruction, or law-enforcement-related applications) outside the U.S. if an export license from the Department of Commerce (“DOC”) is required and no such license is obtained. 50 U.S.C. §§ 4801 & 4819. Specifically, pursuant to the Export Control Reform Act of 2018 (“ECRA”), set forth at Title 50, United States Code, Sections 4801-4852, it is unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under ECRA. 50 U.S.C. § 4819. Willful violations of ECRA are crimes punishable by a prison term of up to 20 years and fines of up to a \$1,000,000. 50 U.S.C. § 4819(b).

6. Pursuant to ECRA, the DOC reviews and controls the export of certain items, including commodities, software, and technologies, from the U.S. to foreign countries through the Export Administration Regulations (“EAR”), 15 C.F.R. §§ 730-774. In particular, the EAR restrict the export of items that could make a significant contribution to the military potential of other nations or that could be detrimental to the foreign policy or national security of the U.S., and impose licensing and other requirements for items subject to the EAR lawfully to be exported from the U.S. “Export” is defined in the EAR as an “actual shipment or transmission out of the United States.” 15 C.F.R. § 734.13(a)(1).

7. The most sensitive items subject to EAR controls are identified on the Commerce Control List (“CCL”). 15 C.F.R. part 774, Supp. No. 1. Items on the CCL

are categorized by Export Control Classification Number (“ECCN”) based on their technical characteristics. Each ECCN has export control requirements depending on destination, end user, and end use.

8. Non-automatic and semi-automatic firearms that are .50 caliber or less are designated under ECCN 0A501.a, and as such require a license to export.

FACTS SUPPORTING PROBABLE CAUSE

9. In summary and as further explained below, NEE AMOO purchased approximately 71 firearms from licensed firearm dealers, all located in the Northern District of Illinois, between August 2006 and July 12, 2024, including 40 since June 2019. For each of the 29 firearms NEE AMOO purchased since October 6, 2020, he signed a Form 4473 that warned him that “Any person who exports a firearm without a proper authorization from either the DOC or the Department of State, as applicable, is subject to a fine of not more than \$1,000,000 and up to 20 years imprisonment.”

10. During three non-custodial interviews with law enforcement on or about July 11, 2024, July 18, 2024, and November 25, 2024, NEE AMOO told law enforcement that he exported all his firearms from Chicago to Ghana, either by personally travelling with them or by shipping them in vehicles or blue barrels. NEE AMOO told law enforcement that he did not declare the firearms or inform the shippers about the firearms. NEE AMOO also stated he did not have a license to export firearms to Ghana. During a residential search warrant of NEE AMOO’s apartment, law enforcement did not recover any firearms, but did recover paperwork

reflecting firearm purchases and paperwork reflecting shipments of vehicles and personal effects by NEE AMOO to Ghana.

Background of NEE AMOO Firearm Purchases

11. Per my training and experience, in May 2020, the ATF mandated a new version of the Form 4473. Beginning in May 2020, the Form 4473 added the following warning at the top of the first page: “Any person who exports a firearm without a proper authorization from either DOC or the Department of State, as applicable, is subject to a fine of not more than \$1,000,000 and up to 20 years imprisonment” (hereinafter, the “May 2020 Revision”).

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0020

Firearms Transaction Record

WARNING: The information you provide will be used to determine whether you are prohibited by Federal or State law from receiving a firearm. Certain violations of the Gun Control Act, 18 U.S.C. 921 et. seq., are punishable by up to 10 years imprisonment and/or up to a \$250,000 fine. Any person who exports a firearm without a proper authorization from either the Department of Commerce or the Department of State, as applicable, is subject to a fine of not more than \$1,000,000 and up to 20 years imprisonment.

Read the Notices, Instructions, and Definitions on this form. Prepare in original only at the licensed premises (including business temporarily conducted from a qualifying gun show or event in the same State in which the premises is located) unless the transaction qualifies under 18 U.S.C. 922(c). **All entries must be handwritten in ink unless completed under ATF Rule 2016-2. PLEASE PRINT.**

Transferor's/Seller's
Transaction Serial
Number (if any)

12. The prior versions of the Form 4473, before May 2020, including the following warning at the top of the first page, “Certain violations of the Gun Control Act, 18 U.S.C. 921, et. seq., are punishable by up to 10 years imprisonment, and/or up to a \$250,000 fine” (“Prior Warning”). According to State of Illinois Firearms Transaction Inquiry Program (“FTIP”), NEE AMOO made the following 41 firearm purchases which used a prior version of the Form 4473 that contained the Prior Warning.

Firearm #	Date of Purchase	Federal Firearm Licensee	Make	Model	Type
1	8/3/2006	Shore Galleries	Ruger	SP101	revolver

2	9/11/2008	Shore Galleries	American Derringer	M-1	pistol
3	12/24/2008	Shore Galleries	Ruger	22/45	pistol
4	7/22/2009	Shore Galleries	Walther	P22	pistol
5	10/30/2010	Shore Galleries	Kahr Arms	P380	pistol
6	8/10/2012	Shore Galleries	Kahr Arms	P380	pistol
7	12/10/2013	SSG ¹	Taurus	PT22	pistol
8	2/19/2014	SSG	North American Arms	Guardian	pistol
9	10/8/2014	SSG	Smith & Wesson	BG-38	revolver
10	10/8/2014	SSG	American Derringer	MI	pistol
11	5/22/2015	Law Weapon & Supply	Double Tap Defense Inc	Double Tap 9mm	pistol
12	2/29/2016	SSG	Beretta	ARX	pistol
13	10/27/2016	SSG	Umarex Sportwaffen	Beretta ARX160	pistol
14	10/27/2016	SSG	German Sports Gun	Firefly	pistol
15	11/16/2016	SSG	Spikes Tactical	ST-15	pistol
16	12/28/2016	SSG	Sig Sauer	P238	pistol
17	5/4/2017	SSG	Smith & Wesson	SD9VE	pistol
18	5/4/2017	SSG	Smith & Wesson	SD9VE	pistol
19	5/4/2017	SSG	Bond Arms	Dragon Slayer	derringer
20	5/4/2017	SSG	Umarex Sportwaffen	Beretta ARX160	pistol
21	6/11/2017	Law Weapon & Supply	Taurus	PT111	pistol
22	6/11/2017	Law Weapon & Supply	Taurus	PT111	pistol
23	7/18/2017	The Gun Doctor	Taurus	709 Slim	pistol
24	7/18/2017	The Gun Doctor	Beretta	U22	pistol
25	11/6/2017	SSG	Smith & Wesson	SD40VE	pistol
26	12/6/2017	SSG	Beretta	PX4 Storm	pistol
27	4/24/2018	SSG	Kimber	Micro Sapphire	pistol
28	7/19/2018	SSG	Smith & Wesson	SD9VE	pistol
29	7/19/2018	SSG	Ruger	American	pistol
30	11/2/2018	Shore Galleries	Excel Arms	Accelerator	pistol

¹ SSG stands for Suburban Sporting Goods.

31	6/24/2019	Shore Galleries	Taurus	PT92	pistol
32	6/24/2019	Shore Galleries	Ruger	P89DC	pistol
33	6/24/2019	Shore Galleries	Kimber	Solo CDP	pistol
34	7/11/2019	Shore Galleries	Taurus	TCP	pistol
35	7/11/2019	Shore Galleries	Springfield Armory	XD45	pistol
36	8/5/2019	Shore Galleries	Smith & Wesson	M&PBG380	pistol
37	12/6/2019	Shore Galleries	Smith & Wesson	SW1911SC	pistol
38	7/14/2020	SSG	Kimber	1911	pistol
39	7/14/2020	SSG	CZ	75B	pistol
40	8/5/2020	SSG	Taurus	G3	pistol
41	8/5/2020	SSG	North American Arms	Breaktop	revolver

13. According to FTIP, NEE AMOO purchased the following 29 firearms (hereinafter, “**Suspect Firearms**”) after the May 2020 Revision:

Suspect Firearm #	Date of Purchase	Federal Firearm Licensee	Make	Model	Type
Suspect Firearm 42	10/6/2020	SSG	Zastava	M57-A	pistol
Suspect Firearm 43	10/6/2020	SSG	Taurus	G2C	pistol
Suspect Firearm 44	11/5/2020	SSG	Bond Arms	Roughneck	pistol
Suspect Firearm 45	3/24/2021	SSG	Bul Armory	Cherokee	pistol
Suspect Firearm 46	3/24/2021	SSG	SDS	1911 Carry	pistol
Suspect Firearm 47	5/11/2021	SSG	Ruger	LCP II	pistol
Suspect Firearm 48	5/11/2021	SSG	North American Arms	Mini 22	pistol
Suspect Firearm 49	5/11/2021	SSG	Canik	TP9SF	pistol
Suspect Firearm 50	7/2/2021	SSG	Ruger	Mark IV	pistol
Suspect Firearm 51	7/2/2021	SSG	S&W	SD9VE	pistol
Suspect Firearm 52	11/1/2021	SSG	Kimber	Micro-9	pistol
Suspect Firearm 53	11/1/2021	SSG	Girsan	MC-28	pistol
Suspect Firearm 54	11/1/2021	SSG	Scy	CPX-2	pistol
Suspect Firearm 55	11/1/2021	SSG	North American Arms	BBS	revolver
Suspect Firearm 56	11/15/2021	SSG	Polymer 80	P80	pistol
Suspect Firearm 57	11/15/2021	SSG	Kimber	K65	revolver
Suspect Firearm 58	12/1/2021	SSG	Canik	TP9SFX	pistol
Suspect Firearm 59	12/1/2021	SSG	Taurus	PT92	pistol
Suspect Firearm 60	12/27/2021	SSG	Taurus	PT92	pistol

Suspect Firearm 61	12/27/2021	SSG	Ruger	SR9C	pistol
Suspect Firearm 62	10/31/2022	SSG	Taurus	PT92	pistol
Suspect Firearm 63	11/6/2022	SSG	Smith & Wesson	1911PC	pistol
Suspect Firearm 64	12/30/2022	SSG	North American Arms	PUG	revolver
Suspect Firearm 65	7/11/2023	SSG	Taurus	Tracker	revolver
Suspect Firearm 66	9/27/2023	SSG	Henry Repeating Arms	H006MML	Other
Suspect Firearm 67	9/27/2023	SSG	Kimber	Micro 9 Bel Air	pistol
Suspect Firearm 68	7/2/2024	SSG	Beretta	PX4 Storm	pistol
Suspect Firearm 69	7/2/2024	SSG	Ruger	Security-9	pistol
Suspect Firearm 70	7/12/2024	SSG	Ruger	Security-9	pistol
Suspect Firearm 71	7/12/2024	SSG	Ruger	Security-9	pistol

14. Per my review, NEE AMOO signed a Form 4473 for each of the **Suspect Firearms** that contained the additional language from the May 2020 Revision.

15. Per my training and experience, each of the **Suspect Firearms** are subject to the Export Administration Regulations (“EAR”), 15 C.F.R. Parts 730-774, and included on CCL, 15 C.F.R. Part 774, Supplement No. 1. As such, their export from the U.S. would require a license or written approval from DOC. According to DOC, Bureau of Industry and Security records, NEE AMOO has not obtained a license or written approval, nor had applied for such license, from DOC to export firearms.

May 15, 2024 NEE AMOO Statement to SSG Manager

16. On or about May 15, 2024, I spoke to the manager of SSG (the store where NEE AMOO purchased most of his firearms) about NEE AMOO’s firearm purchase from May 10, 2024. According to the store manager, he has known NEE AMOO for approximately 10 years through interactions at SSG. The store manager explained that NEE AMOO comes to SSG a few times a year and purchases multiple

firearms at the same time. According to the store manager, NEE AMOO has told him that he (NEE AMOO) exports his firearms to Ghana and that NEE AMOO claimed to the store manager that he filled out paperwork to export the firearms.

July 11, 2024 Non-Custodial Interview of NEE AMOO

17. On July 11, 2024, I, along with another ATF agent conducted an audio-recorded, non-custodial interview of NEE AMOO regarding his purchase of firearms.² My partner and I identified ourselves as ATF agents. During this interview, NEE AMOO stated he purchased firearms in the U.S. because it is easier to purchase firearms in the U.S. than in Ghana. NEE AMOO said he transported one firearm at a time to Ghana each time he flew overseas.

18. NEE AMOO stated he did not ship firearms to Ghana because the firearms could be seized in the U.S. since AMOO did not have a license to export firearms.

19. NEE AMOO said the firearms were currently located at his property in Ghana. Despite saying he flew with one firearm at a time, and that all firearms (except two) were in Ghana, flight records revealed 11 outbound flights for NEE AMOO since 2009.

20. NEE AMOO stated he had two to three firearms in Chicago, but did not disclose where in Chicago they were located. NEE AMOO stated he lived at Apartment 304 on West Estes Avenue, Chicago, (“Apartment 304”) and has lived in

² The summaries of recorded conversations in this affidavit do not reference all topics covered, and statements made, during the conversations.

the Chicago area for approximately six years. Additionally, NEE AMOO stated he did not shoot guns in the U.S., that he did shoot guns in Ghana, and that he did not want to be involved in “that stuff” in the U.S.

21. During the interview, ATF agents advised NEE AMOO of the lawful way to export firearms, specifically instructing him that to lawfully export firearms, a person would have to declare the firearms and have a license to export. NEE AMOO responded that he did not have a license to export firearms and that he was not interested in applying for a license to do that.

22. On July 12, 2024, the day after his first interview with ATF, NEE AMOO purchased Suspect Firearm 70, and Suspect Firearm 71, from SSG.

July 18, 2024 Non-Custodial Interview of NEE AMOO

23. After further investigative efforts to attempt to corroborate NEE AMOO’s statements during his July 11, 2024, agents met with NEE AMOO again. On July 18, 2024, I, along with another ATF agent conducted a second audio-recorded non-custodial interview of NEE AMOO.

24. During this interview, NEE AMOO explained that firearms are cheaper in the U.S. and that they are very expensive to buy in Ghana, so he buys his firearms in the U.S. NEE AMOO stated he either brought one or two firearms on the plane when he flew to Ghana, or shipped the firearms to Ghana. This statement was contrary to NEE AMOO’s July 11, 2024 statement that he did not ship firearms to Ghana.

25. NEE AMOO said he did not declare the firearms with U.S. Customs when he shipped them to Ghana. NEE AMOO explained he used various companies and people to ship his firearms. NEE AMOO stated his friends shipped used vehicles and blue barrels to Ghana. NEE AMOO stated that he wrapped his firearms and hid them in used vehicles or blue barrels for shipment to Ghana, and that he paid approximately \$180 per blue barrel. NEE AMOO stated he took pictures of the firearms on his cellphone before he placed them in the blue barrels, and wrote down the names of multiple shippers, including Individual A. NEE AMOO explained that Individual A is a person who ships vehicles to Ghana.

26. According to the Illinois Secretary of State, Individual A owns a shipping company in Chicago.

27. According to NEE AMOO's cellphone toll records,³ there were approximately 141 phone calls between NEE AMOO and Individual A⁴ between September 2022 and June 2024.

28. NEE AMOO explained he would not tell the shippers there were firearms in the blue barrel because the shipper would not ship them. Nor did he declare the firearms to avoid U.S. Customs. NEE AMOO stated he has someone in Ghana pick up the firearm shipments. NEE AMOO stated that although he was not a firearms collector, the firearms were located at his Ghana property.

On July 31, 2024 NEE AMOO Wiped Cell Phone

³ NEE AMOO confirmed his cellphone number during the July 11, 2024 interview.

⁴ ATF reviewed NEE AMOO's toll records and searched the most called phone numbers in a law enforcement database. Per the law enforcement database, one of those phone numbers came back to Individual A.

29. On July 26, 2024, Magistrate Judge Beth W. Jantz authorized a search warrant for NEE AMOO's cellphone.

30. On July 31, 2024, ATF agents conducted surveillance outside Apartment 304 to locate NEE AMOO and execute the search warrant. After several hours of waiting at Apartment 304, agents called NEE AMOO on his cell phone. Despite promises from NEE AMOO that he would return to Apartment 304 to speak with agents, he did not. NEE AMOO did not return to Apartment 304, and stopped answering his cellphone.

31. Several hours later, agents located NEE AMOO at a phone store located on West Devon Avenue in Chicago. Agents explained to NEE AMOO that they had a search warrant for his cell phone and provided NEE AMOO with a copy of the search warrant. Agents discovered from a phone store employee who assisted NEE AMOO that NEE AMOO had his cell phone wiped and reset, minutes before agents arrived.

32. According to the phone store employee, NEE AMOO said the FBI was after him, but he was not sure if they were real FBI agents. According to the employee, NEE AMOO also said he (NEE AMOO) has a firearm license, and could purchase as many firearms as he wanted.

October 9, 2024 Non-Custodial Interview of NEE AMOO

33. According to CBP records, on August 10, 2024, NEE AMOO flew to Ghana from the U.S. On October 9, 2024, NEE AMOO returned to U.S. from Ghana.

On October 9, 2024, the Tactical Terrorism Response Team (“TTRT”), conducted a non-custodial interview of NEE AMOO at the O’Hare Airport.⁵

34. In an interview with the TTRT, NEE AMOO said he lives at Apartment 304. NEE AMOO told the TTRT he keeps firearms in Apartment 304, but he could not provide the exact number of firearms he has. NEE AMOO explained he intended to ship the firearms to Ghana at a future date. NEE AMOO stated he plans to open a security company in Ghana in the next three years. NEE AMOO was adamant he never shipped, took, or facilitated the removal of a firearm out of the U.S. or into Ghana.⁶ When TTRT reminded NEE AMOO that he previously told ATF agents that he shipped his firearms out of the U.S. to Ghana, NEE AMOO said he lied to the agents because he was scared while talking to agents he did not know. NEE AMOO told the TTRT that he shipped a vehicle to Ghana in or around 2017.

October 11, 2024 NEE AMOO Statement to SSG Manager

35. According to the manager of SSG, on October 11, 2024, NEE AMOO asked for advice on what to do about the ATF investigating him. The manager suggested NEE AMOO tell the truth and NEE AMOO replied, “What if I cannot tell them the truth?” NEE AMOO also asked the manager what would happen if he sent the firearms to Africa without having a license. The manger also recalled NEE AMOO previously stating he shipped firearms to Africa.

⁵ The interview was not record per TTRT policy.

⁶ This statement is contrary to NEE AMOO’s July 11 and 18, 2024 statements that he either brought one or two firearms on the plane when he flew to Ghana, or he shipped the firearms to Ghana.

November 7, 2024 Search of Apartment 304

36. On November 1, 2024, Magistrate Judge Jeffrey Cole authorized a residential search warrant for NEE AMOO's Apartment 304. On November 7, 2024, law enforcement searched NEE AMOO's apartment. No firearms were found. Law enforcement recovered paperwork reflecting firearm purchases and the existence of firearms-related documents in the apartment, including multiple firearm tags, receipts for firearms for SSG, Shoot Point Blank, and Shore Galleries, Federal Firearm Licensees, as well as a handwritten container manifest and a car shipping manifest.

37. Law enforcement also recovered a Declaration (Bill of Entry) for Customs Use Only paperwork from the Ghana Revenue Authority Customs Division reflecting shipments by NEE AMOO to Ghana for vehicles and personal effects from 2017 and 2021. CBP does not have records of these shipments. Law enforcement also recovered payment receipts from Ecobank, a pan-African banking conglomerate with banking operations in African countries including Ghana, bearing NEE AMOO's name for shipments in 2017.

November 25, 2024 Non-Custodial Interview of NEE AMOO

38. On November 21, 2024, the Illinois State Police ("ISP") found NEE AMOO presented a clear and present danger, and revoked NEE AMOO's Illinois Firearm Owner Identification ("FOID") card.

39. On November 25, 2024, an ISP Task Force Officer (“TFO”) conducted a non-custodial interview of NEE AMOO about his FOID Card Revocation Letter. The interview was video-recorded on the TFO’s body-worn camera.

40. The ISP TFO asked if NEE AMOO was in possession of any firearms and NEE AMOO advised he had no firearms. NEE AMOO stated he did not retain records of all his firearm purchases because he shipped all his firearms to Ghana, Africa.⁷

41. NEE AMOO said he did not have receipts or paperwork showing he shipped all of his firearms to Ghana. NEE AMOO further explained he knew people who shipped cars and blue barrels to Africa and that he shipped the firearms in the cars and blue barrels.

42. NEE AMOO explained the shippers did not give him a receipt because the shippers did not complete paperwork because it was cheaper and they were able to avoid issues with U.S. Customs.

43. NEE AMOO then completed the Firearm Disposition Record. Under the “Firearms Section” of the form, NEE AMOO handwritten “Transfer to Ghana I don’t have them in my possession anymore.” NEE AMOO signed and initialed the form, and provided his FOID card to the ISP TFO.

⁷ This statement is contrary to NEE AMOO’s October 9, 2024 statement that he never shipped any firearms to Ghana, and that they were all in his home in Chicago. This statement is consistent with NEE AMOO’s July 18, 2024 interview with ATF stating he shipped all his firearms to Ghana.

	Make	Model	Serial #	PRINTED NAME and ADDRESS of Person to Whom Firearms were Transferred:	
				Please initial by each weapon received	FOID# or FFL# (only add to first line)
1	NO FIREARMS				
2					
3	TRANSFER TO CHINA				
4	I don't have them				
5	on my possession				
6	any more				

CONCLUSION

44. Based on the foregoing facts, I respectfully submit there is probable cause to believe that beginning on or about October 6, 2020, through on or about November 25, 2024, NEE AMOO willfully and fraudulently exported the Northern District of Illinois, and attempted to export and send the Northern District of Illinois, the above-listed firearms, contrary to a law and regulation of the of the U.S., namely Title 50, U.S. Code, Section 4819, and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774 Supp. No. 1, in violation of Title 18, U.S. Code, Section 554(a).

FURTHER AFFIANT SAYETH NOT.



ALEXANDRA LISS

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SWORN TO AND AFFIRMED by telephone December 9, 2024.



Honorable JEFFREY COLE

United States Magistrate Judge