

AO 91 (Rev. 1/17) Criminal Complaint

AUSA Andres Q. Almendarez (312) 371-7568

FILED**TD****6/10/2026****THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TEVIN CURLEE,
also known as "TC"

CASE NUMBER: 26 CR 285

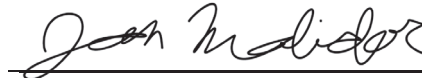
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about June 3, 2026, at Crestwood, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*Title 18, United States Code, Section
922(o)*Offense Description*

unlawfully possessed and transferred a machinegun

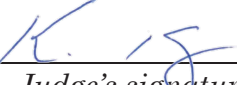
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

JON J. MOLIDOR

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: June 10, 2026
Judge's signatureCity and state: Chicago, IllinoisKERI L. HOLLEB HOTALINGU.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, JON J. MOLIDOR, 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 January 2024. My current responsibilities include the investigation of criminal violations of law as they relate to federal firearms offenses, including the unlawful possession of firearms or ammunition by convicted felons, firearms trafficking, violent crime, and narcotics trafficking. I am currently assigned to the ATF Homeland Security Task Force (HSTF) Strike Force V.

2. As part of my duties as a Special Agent, I investigate violent crimes, criminal violations relating to firearms, and firearms trafficking. My current responsibilities also include the investigation of violent gun crimes and the apprehension of violent fugitives. In addition, I have participated in numerous investigations that involve the illegal purchase, trafficking, possession, and use of firearms and ammunition during, and in relation to, crimes of violence.

3. This affidavit is submitted in support of a criminal complaint alleging that Tevin CURLEE, also known as TC, has violated Title 18, United States Code, Section 922(o). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CURLEE with unlawful possession and transfer of a machinegun, I have not included each and

every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge; my review of reports and documents related to this investigation; my review of video recordings related to this investigation; conversations with others who have knowledge of the events and circumstances described in this affidavit; my review of law enforcement databases; my own training and experience and the training and experience of other agents with whom I work; information provided to me by local law enforcement officers, and from persons with knowledge regarding relevant facts.

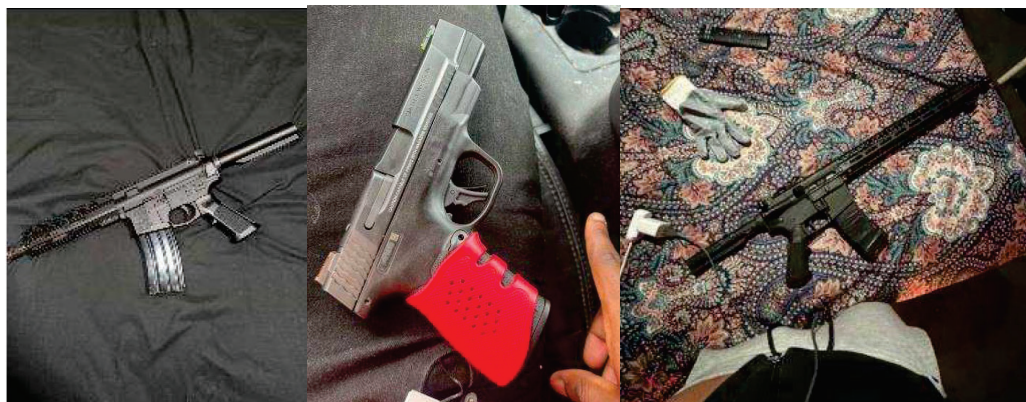
5. In summary, and as set forth in more detail below, the ATF has been conducting an investigation into firearms trafficking by CURLEE and others since approximately April 2026. During the investigation, undercover law enforcement officers have purchased firearms from CURLEE on approximately two occasions. On or about June 3, 2026, CURLEE told a confidential informant (“CI-1”)¹ that he would sell a an “automatic with a banana clip” for \$1,600. Later on the same day, CURLEE sold a firearm to an undercover law enforcement officer with a drop in auto sear (a machinegun conversion device) installed.

¹ CI-1 has cooperated with ATF since approximately May of 2022. CI-1 has been paid approximately \$26,250 for his / her cooperation since that time. Based on my review of CI-1’s criminal history, CI-1 has prior felony convictions involving firearms and/or narcotics offenses, and is currently on felony probation.

6. In approximately April 2026, CI-1 informed law enforcement officers that that he/she knew an individual named “TC” who was trafficking firearms in the Chicago area. CI-1 provided phone number (708) ***-3606 for TC. Based on information from a law enforcement database, law enforcement officers determined was likely CURLEE. CI-1 identified an unlabeled drivers license photograph of CURLEE as the person he/she knew as TC. The image of CURLEE is depicted below:



7. Between approximately April 22, 2026, and June 3, 2026, CI-1 exchanged recorded calls and text messages with CURLEE using phone number (708) ***-3606. For example, on April 22, 2026, CI-1 sent a text message to CURLEE that stated, “Yo send them pics here.” Later on April 22, 2026, CURLEE sent several pictures that appeared to depict firearms. Some of those images are depicted below:



8. On or about April 22, 2026, CS-1 sent a text message to CURLEE that stated: “Yo my guys said anything with a switch.” Based on my training and experience, I know that a “switch” is a reference to a machinegun conversion device that converts a semiautomatic weapon to a fully automatic weapon. CURLEE responded: “My cousin is putting together some frt rn.” Based on my training and experience, I believe that “frt” refers to a “forced reset trigger,” which is a device that allows a semiautomatic weapon to reset faster, allowing for quicker follow up shots without necessarily converting the weapon to a machinegun.

9. At approximately 9:55 p.m. on or about June 2, 2026, CURLEE sent CI-1 a text message that stated: “Yo” and then sent a video that depicts an AR style pistol at approximately 9:56 p.m. At 12:45 a.m. on or about June 3, 2026, CI-1 sent a text message to CURLEE stating: “How much??” CURLEE responded: “\$1600 is automatic with a banana clip.”

10. Later, on or about June 3, 2026, CI-1 sent a message to CURLEE stating: “Yo I sent to him and ima let u know finna tru to grab it today what u gonna be on?” CURLEE responded: “I’m ready whenever.” CURLEE and CI-1 subsequently agreed to meet later in the day on June 3, 2026. On or about June 3, 2026, under the direction of law enforcement, CI-1 placed a phone call to CURLEE and instructed him to meet another person who, unbeknownst to CURLEE, was also an ATF confidential informant (“CI-2”)² at Business A on the 13400 block of Cicero Avenue in Crestwood,

² CI-2 has cooperated with ATF since approximately October 2017, though he / she was deactivated for a portion of that time due to an arrest. CI -2 has been paid approximately

Illinois. This phone call was not recorded, but CI-1 was debriefed regarding the content of the call.

11. An undercover law enforcement officer (UC-1) accompanied CI-2 in an undercover law enforcement vehicle (“UCV”) for the transaction. Prior to the transaction, law enforcement officers searched CI-2 and his/her vehicle for the presence of contraband and / or money with negative results.

12. UC-1, CI-2 and the UCV were equipped with monitoring and recording equipment prior to the transaction.

13. The UCV traveled to Business A to conduct the transaction. At 6:23 p.m. CI-1 sent CURLEE a description of the UCV and the location of the UCV in the parking log. According to UC-1, at approximately 6:30 p.m., UC-1 observed a black Dodge Charger park next to the UCV. Law enforcement officers conducting surveillance observed an individual identified as CURLEE based on a comparison to a known photograph of CURLEE. CURLEE then exited the Dodge Charger. CURLEE showed CI-2 a brown cardboard box and said words to the effect of, “Man, I don’t even wanna touch it.” CURLEE told CI-2 that he had not provided a magazine with the firearm. The image below depicts CURLEE at the rear of the vehicle during the conversation with CI-2:

\$150,350 for his / her cooperation. CI-2 has prior felony convictions and/or was arrested for firearm and narcotic related charges.



14. According to UC-1 and recordings of the transaction, CI-2 and CURLEE brought the cardboard box to the trunk of the UCV. The recording depicts CURLEE saying words to the effect of, “Ain’t goin lie I got five more of them.”

15. According to UC-1 and recordings of the transaction, CI-2 walked to the passenger door of the UCV and retrieved \$1,600 from UC-1. CI-2 counted the money in front of CURLEE and handed the money to CURLEE. The image below depicts CURLEE receiving the money:



16. From the brown cardboard box that CURLEE gave to CI-2, law enforcement officers observed and then recovered an Anderson Manufacturing AM-15, 300 blackout pistol, SN: 19213996 with a drop in auto sear. The firearm and drop in auto-sear are depicted below.



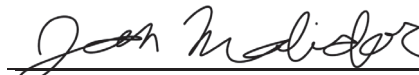
17. Based on my training and experience and the training and experience of other agents, I know a drop in auto-sear allows a firearm to fire in a fully automatic mode.

18. Following the June 3, 2026, transaction, CI-2 and CURLEE continued to have discussions regarding firearms purchases, including discussions related to machinegun conversion devices. For example, on June 4 and 5, 2026, CURLEE sent CI-2 a series of images that appeared to depict firearms for sale. On June 5, 2026, CI-2 sent CURLEE a message that said: "Im on the phone those fullys?" CURLEE responded: "Not fullys but ofc can be turned into em."

CONCLUSION

19. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that TEVIN CURLEE has committing the offense of unlawfully possessing and transferring a machinegun, in violation of Title 18, United States Code, Section 922(o).

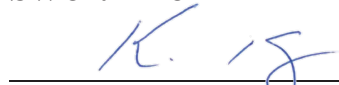
FURTHER AFFIANT SAYETH NOT.



JON J. MOLITOR

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

SWORN TO AND AFFIRMED by telephone June 10, 2026.



Honorable KERI L. HOLLEB HOTALING
United States Magistrate Judge