
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Honorable James B. Clark, III
	:	
VICTOR GONZALEZ	:	Mag. No. 23-12193
	:	

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 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

VICTOR GONZALEZ,

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,

VICTOR GONZALEZ,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transport firearms, namely, two Polymer 80 (P80) pistols, bearing no serial number, 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,

VICTOR GONZALEZ,

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).

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 Victor Gonzalez (“Gonzalez”) as a trafficker of firearms. In or around September 2023, law enforcement conducted a controlled purchase from Gonzalez, which resulted in the recovery of a firearm (the “Firearm”). The controlled purchase summarized herein was captured by audio-recording devices.

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, Gonzalez has not received an FFL, and he is accordingly not licensed as a dealer, importer, or manufacturer of firearms.

3. On or about September 21, 2023, a confidential law enforcement source (“CS”) met with Gonzalez near a car dealership on South Orange Avenue in Newark, New Jersey to purchase a firearm. During the meeting, the CS purchased a Polymer 80 (P80) pistol bearing no serial number (“P-80”) in exchange for \$1,500 in cash. Law enforcement confirmed the operability of the P80.

4. The firearm that the CS purchased from Gonzalez was manufactured outside the State of New Jersey, and thus traveled in interstate commerce prior to Gonzalez having possession of it in New Jersey during the controlled Firearm purchase which occurred on or about September 21, 2023.

5. During the controlled Firearm purchase, Gonzalez held a New Jersey driver's license and resided in New Jersey and transferred the Firearm to the CS after being told that the CS was a resident of Connecticut.