

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

MICHAEL JOHN JAMES

Case No.

Mag. No. 24-mj-2011 (AMD)

Defendant(s)

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 the date(s) of February 27, 2024 in the county of Atlantic in the

District of New Jersey, the defendant(s) violated:

Code Section

Title 26, United States Code,
Sections 5861(d) and 5871

See Attachment A.

Offense Description

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.

Complainant's signature

Kerry Lasso, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/14/2024

Judge's signature

City and state: Camden, New Jersey

Hon. Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: /s/***Jeffrey B. Bender***
Jeffrey B. Bender, Assistant U.S. Attorney

Date: May 14, 2024

ATTACHMENT A
COUNT ONE

(Unlawful Possession of Unregistered Machineguns and Other Firearms)

On or about February 27, 2024, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

MICHAEL JOHN JAMES,

knowingly possessed firearms, as that term is defined in Title 26, United States Code, Section 5845, including:

- a machinegun, as that term is defined in Title 26, United States Code, Sections 5845(a)(6) and (b), more particularly described as a BCI Defense, model MNM15, multi-caliber, complete AR-type lower receiver assembly, with serial number MM0483;
- two machineguns, as that term is defined in Title 26, United States Code, Sections 5845(a)(6) and (b), more particularly described as Century Arms, model UC-9, 9x19mm caliber, Uzi-type firearms, with serial numbers GMT02613 and GMT02718;
- three silencers, as that term is defined in Title 26, United States Code, Section 5845(a)(7), more particularly described as cylindrical metal devices containing a rear end-cap, outer tube, inner sleeve, front end-cap, and a series of seven or eight baffles;
- a weapon made from a rifle, as that term is defined in Title 26, United States Code, Section 5845(a)(4), more particularly described as a modified PW Arms, model M91/30, 7.62x54Rmm caliber firearm, with an obliterated serial number, that was shortened to be approximately $19\frac{7}{8}$ inches in overall length with a rifled barrel approximately $7\frac{1}{2}$ inches in length; and
- a weapon made from a shotgun, as that term is defined in Title 26, United States Code, Section 5845(a)(2), more particularly described as a modified Savage Arms, Fox model B, side-by-side, double-barreled, 12-gauge firearm, with serial number 42161, that was shortened to be approximately $13\frac{1}{4}$ inches in overall length with a smooth bore barrel approximately $6\frac{1}{2}$ inches in length,

which firearms were not registered to him in the National Firearms Registration and Transfer Record, as required by Title 26, United States Code 5841.

In violation of Title 26, United States Code, Sections 5861(d) and 5871.

ATTACHMENT B

I, Kerry Lasso, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. 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 and recordings of the evidence. Where statements of others are related herein, they are related in substance and part. 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 and time, I am asserting that it took place on or about the date and time alleged.

1. In February 2024, U.S. Customs and Border Protection in Memphis, Tennessee, intercepted two packages containing suspected controlled substances that had been shipped from South Africa. The packages both were addressed to Michael John James ("James") at an address on Colwick Drive, Somers Point, NJ 08244 ("the Residence"). Investigators planned to conduct a controlled delivery of the packages to the Residence. In advance of the controlled delivery, a New Jersey Superior Court judge authorized a warrant that would allow investigators to search the Residence if James or another individual brought the packages into the Residence. The search warrant authorized investigators to seize from the Residence, among other items, firearms.

2. On February 27, 2024, investigators conducted a controlled delivery of the packages and observed James bring both packages into the Residence. Several minutes later, officers announced their presence and James exited the Residence with the packages. Officers entered the Residence and encountered no other individuals while securing the Residence. During the ensuing search, officers recovered several dozen firearms and other ballistics items pursuant to the warrant.

3. Some of the firearms and ballistics items recovered from the Residence were analyzed by an ATF Firearms Enforcement Officer. Based on my training, experience, knowledge of the investigation, and consultation with the ATF Firearms Enforcement Officer and other ATF experts, I believe the following items recovered from the Residence meet the definition of "firearm," as that term is defined in Title 26, United States Code, Section 5845:

- a. a machinegun, as that term is defined in Title 26, United States Code, Sections 5845(a)(6) and (b), more particularly described as a BCI Defense, model MNM15, multi-caliber, complete AR-type lower receiver assembly, with serial number MM0483, that was found to be operable when test-fired with an upper receiver assembly;
- b. a machinegun, as that term is defined in Title 26, United States Code, Sections 5845(a)(6) and (b), more particularly described as a Century Arms, model UC-9, 9x19mm caliber, Uzi-type firearm, with serial number GMT02613, that was found to be operable when test-fired.
- c. a machinegun, as that term is defined in Title 26, United States Code, Sections 5845(a)(6) and (b), more particularly described as a Century Arms, model UC-9, 9x19mm caliber, Uzi-type firearm, with serial number GMT02718, that was found to be operable when test-fired using the barrel from the machinegun with serial number GMT02613 (described in the preceding paragraph);
- d. three silencers, as that term is defined in Title 26, United States Code, Section 5845(a)(7), more particularly described as cylindrical metal devices containing a rear end-cap, outer tube, inner sleeve, front end-cap, and a series of seven or eight baffles, and which one of the three silencers was test-fired and confirmed to reduce the sound of a firearm;
- e. a weapon made from a rifle, as that term is defined in Title 26, United States Code, Section 5845(a)(4), more particularly described as a modified PW Arms, model M91/30, 7.62x54Rmm caliber firearm, with an obliterated serial number, that was shortened to be approximately $19\frac{7}{8}$ inches in overall length with a rifled barrel approximately $7\frac{1}{2}$ inches in length, that was found to be operable when test-fired; and
- f. a weapon made from a shotgun, as that term is defined in Title 26, United States Code, Section 5845(a)(2), more particularly described as a modified Savage Arms, Fox model B, side-by-side, double-barreled, 12-gauge firearm, with serial number 42161, that was shortened to be approximately $13\frac{1}{4}$ inches in overall length with a smooth bore barrel approximately $6\frac{1}{2}$ inches in length, that was found to be operable when test-fired.

4. A records query shows that none of the eight firearms described herein were registered to James in the National Firearms Registration and Transfer Record.