
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **AMENDED CRIMINAL COMPLAINT**
:
v. : **Mag. No. 22-10112**
:
ANGELO CHAVEZ, :
PHILLIP LUEVANO :


I, Joshua R. Leslie, 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 Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

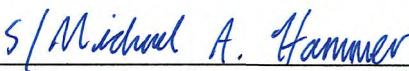
continued on the attached page and made a part hereof.



Postal Inspector Joshua R. Leslie
United States Postal Inspection Service

Postal Inspector Leslie attested to this Complaint via telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A))

Sworn to me telephonically
On this 17th day of March, 2022



Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

**(Conspiracy to Distribute and Possess with Intent
to Distribute Methamphetamine and Fentanyl)**

From in or around August 2020 through in or around December 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants

**ANGELO CHAVEZ,
PHILLIP LUEVANO**

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to distribute and possess with intent to distribute 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, and a quantity of a mixture and substance containing fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWO
(Conspiracy to Unlawfully Transport Firearms)

From in or around August 2020 through in or around December 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants

ANGELO CHAVEZ,
PHILLIP LUEVANO

not being licensed importers, manufacturers, or dealers, did knowingly and intentionally conspire and agree with each other and others, known and unknown, to engage in the business of dealing in firearms and, in the course of such business, shipped and transported firearms in interstate commerce, including, but not limited to, the following: a Springfield Armory Model 1911 A1 .45 caliber firearm, an AK-47 firearm, and an AR-15 firearm with “We The People” engraved on the barrel, contrary to Title 18, United States Code, Section 922(a)(1)(A).

In violation of Title 18, United States Code, Section 371.

COUNT THREE
(Possession of Unregistered Firearms)

From in or around August 2020 through in or around December 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants

**ANGELO CHAVEZ,
PHILLIP LUEVANO**

knowingly possessed firearms as defined in 26 U.S.C. § 5845(a), namely an AR-15 firearm with auto sear and “We The People” engraved on the barrel, and which firearms were not registered to defendants in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(d).

COUNT FOUR
(Transportation of Unregistered Firearms)

From in or around August 2020 through in or around December 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants

**ANGELO CHAVEZ,
PHILLIP LUEVANO**

knowingly transported in interstate commerce firearms as defined in 26 U.S.C. § 5845(a), including, but not limited to, the following: an AR-15 firearm with auto sear and “We The People” engraved on the barrel, and which firearms were not registered to defendants in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(j).

ATTACHMENT B

I, Joshua R. Leslie, have been a Postal Inspector with the United States Postal Inspection Service (“USPIS”) for approximately 5 years and am currently assigned to the Contraband Interdiction and Investigations Group. During my employment I have been trained in various aspects of law enforcement, including the investigations of darknet marketplaces, cryptocurrencies, and narcotics and firearms offenses. 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, and evidence. Where statements of others are related herein, they are related in substance and 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. 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.

Background

1. Starting in or around August 2020, USPIS began conducting an undercover operation on the social media platform Telegram.¹ Several channels were identified as selling narcotics, including “TMO Drug Menu” and “@IllPhil’s Drug Menu” which advertised the sale of various types of illegal drugs, including heroin and various pills.

2. As described below, law enforcement has determined that Angelo Chavez (“CHAVEZ”) was the administrator of “TMO Drug Menu” and used the handle “TrapMarketOfficial” and that Phillip Luevano (“LUEVANO”) was the administrator of “@IllPhil’s Drug Menu” and used the handle “The Illest.” In addition to offering various drugs for sale, CHAVEZ also advertised the sale of various firearms on his TrapMarketOfficial Telegram page.

3. An undercover law enforcement agent (the “UC”) made contact with CHAVEZ, and then LUEVANO, who facilitated the purchases of controlled substances and firearms as described below. All conversations described below occurred via Telegram, except where otherwise stated.

4. The UC provided CHAVEZ and LUEVANO with two different New Jersey addresses (“NJ Address-1” and “NJ Address-2”). All parcels containing controlled substances and firearms were sent to NJ Address-1, except where otherwise stated.

¹ Telegram is an encrypted cloud-based instant messaging, video calling, and VoIP (Voice over Internet Protocol) service which allows users to send messages, photos, videos, and files, and created groups for broadcasting to an unlimited number of Telegram users.

5. Except where otherwise stated, the UC paid for the described controlled substances and firearms with Bitcoin, which was sent through Crypto Currency Exchange-1.

6. None of the firearms described below were registered to either CHAVEZ or LUEVANO in the National Firearms Registration and Transfer Record. In addition, neither CHAVEZ nor LUEVANO had a license to deal in or transport the firearms described below.

Undercover Purchases of Controlled Substances and Firearms

7. In or around August 2020, the UC made contact with CHAVEZ, who was using the TrapMarketOfficial moniker, and inquired about purchasing a quantity of "M/30s," which refers to oxycodone pills. CHAVEZ responded: "@IllPhill will assist." The UC then contacted LUEVANO, who was using The Illest moniker, stating: "Hey Phil! Trap sent me over to you ... He said you got m30s that you could hook me up with." The UC subsequently purchased 10 pills of oxycodone, which were mailed ("Parcel 1") from an address in Modesto, California (the "Modesto address"). Upon inspection by law enforcement, Parcel 1 was found to contain approximately one gram of a substance containing fentanyl.

8. Later in August 2020, the UC initiated a conversation with LUEVANO about purchasing 50 oxycodone pills. Following this conversation, the UC purchased 50 pills of what the UC believed to be oxycodone. The package ("Parcel 2") was sent from the Modesto Address and was found to contain approximately 5 grams of a substance containing fentanyl. In addition, a fingerprint matching LUEVANO's fingerprint was found on a piece of aluminum foil used to package the pills found inside Parcel 2.

9. In or around September 2020, the UC initiated another conversation with LUEVANO about purchasing an additional 50 oxycodone pills. Following this conversation, the UC purchased 50 pills of what the UC believed to be oxycodone and sent payment to LUEVANO through Crypto Currency Exchange-1. The package ("Parcel 3") was sent from the Modesto Address and was found to contain approximately 7 grams of a substance containing bupropion, a synthetic opioid. In addition, fingerprints matching LUEVANO's fingerprints were found on a piece of aluminum foil used to package the pills and under the flap of the mailing envelope of Parcel 3.

10. In or around September 2020, the UC initiated a conversation with CHAVEZ, who was using the TrapMarketOfficial moniker on Telegram, pertaining to the purchase of heroin. The UC agreed to purchase heroin and sent payment to CHAVEZ. The package ("Parcel 4") was sent from the Modesto Address and was found to contain approximately 25 grams of a substance that

contained heroin. In addition, a fingerprint matching CHAVEZ's fingerprint was found in the inner parcel wrapping inside the mailing envelope of Parcel 4.

11. In or around September 2020, the UC initiated a conversation with CHAVEZ in response to CHAVEZ advertising the sale of a Springfield Armory .45 caliber firearm. CHAVEZ had uploaded photos of the firearm, as well as a video of the firearm being fired. The UC also inquired about purchasing heroin from CHAVEZ. The UC agreed to purchase the firearm and heroin and sent payment to CHAVEZ. The firearm, a Springfield Armory Model 1911-A1 .45 caliber, and heroin ("Parcel 5") were sent from the Modesto Address. Upon inspection by law enforcement, the firearm was determined to have been stolen. Parcel 5 was also found to contain approximately 24 grams of a substance containing heroin. In addition, several fingerprints matching CHAVEZ's fingerprints were found on the exterior of Parcel 5, as well as on the adhesive side of the handwritten label on Parcel 5.

12. In or around October 2020, the UC initiated a conversation, via text message, with LUEVANO, who was using telephone number (209) 673-3016 (the "3016 Number").² LUEVANO had previously provided the 3016 Number to the UC. Following this conversation, the UC purchased 50 pills of oxycodone and sent payment to LUEVANO. The package ("Parcel 6") was sent from the Modesto Address and was found to contain approximately 5 grams of a substance containing fentanyl.

13. In or around October 2020, the UC had a conversation with CHAVEZ during which CHAVEZ displayed multiple firearms for sale and indicated that he could sell a Glock firearm with several magazines, including high-capacity magazines. The UC agreed to purchase a Glock 27 .40 caliber firearm and sent payment to CHAVEZ. The firearm ("Parcel 7") was sent from the Modesto address. Several fingerprints matching CHAVEZ's fingerprints were found on the inside of Parcel 7, including on the adhesive side of the tape used to wrap the firearm found inside Parcel 7.

14. In or around October 2020, the UC had a conversation with CHAVEZ during which CHAVEZ indicated that he had an AR-15 pistol for sale. The UC agreed to purchase the AR-15 pistol and sent payment to CHAVEZ. The firearm, which did not contain a serial number, was sent from the Modesto Address in 2 separate boxes ("Parcel 8" and "Parcel 9").

15. In or around October 2020, the UC had a conversation with CHAVEZ during which CHAVEZ indicated that he had methamphetamine for sale. The UC agreed to purchase a quantity of methamphetamine and sent

² The 3016 Number is subscribed to an individual believed to be Luevano's mother.

payment to CHAVEZ. The package ("Parcel 10") was found to contain approximately 27 grams of a substance containing methamphetamine.

16. In or around October 2020, the UC initiated a conversation, via text message, with LUEVANO, who was using telephone number (209) 603-5820 (the "5820 Number"). LUEVANO had previously provided the 5820 Number to the UC. The UC inquired about purchasing MDMA (methylenedioxyamphetamine), which the UC referred to as "molly." LUEVANO agreed to sell the UC an ounce of MDMA. The conversation then continued via Telegram, where LUEVANO provided the UC with Luevano's PayPal and Venmo account. The UC then sent payment to LUEVANO. The package ("Parcel 11") was received and found to contain approximately 27 grams of a substance containing methylenedioxyamphetamine ("MDMA").

17. In or around November 2020, the UC had a conversation with CHAVEZ during which CHAVEZ indicated that he had an AR-15 firearm for sale. CHAVEZ indicated that the firearm could be sold with an auto sear switch which would make the firearm operate as a fully automatic firearm. The UC agreed to purchase the firearm with the auto sear switch and sent payment to CHAVEZ. The firearm and auto sear switch were received in two separate packages ("Parcel 12" and "Parcel 13," respectively). Several fingerprints matching CHAVEZ's fingerprints were found on the adhesive side of the unused label found inside the box containing Parcel 12.

18. In or around November 2020, the UC had a conversation with CHAVEZ about purchasing an AK-47 firearm. The UC agreed to buy the firearm and sent payment to CHAVEZ. Several days later, CHAVEZ told the UC that LUEVANO would be shipping the firearm for CHAVEZ. The UC subsequently had a conversation with LUEVANO, during which LUEVANO stated that CHAVEZ gave LUEVANO a firearm to ship to the UC. The firearm ("Parcel 14") and accessories ("Parcel 15") were shipped in 2 separate packages. Several fingerprints matching LUEVANO's fingerprints were found on packaging materials inside Parcel 15.

19. During the conversation described above in Paragraph 18, LUEVANO told the UC that the Springfield Armory firearm that the UC had previously purchased from CHAVEZ (see paragraph 11) had belonged to LUEVANO.

20. Between in or around November and December 2020, the UC had conversations with CHAVEZ and LUEVANO about purchasing an AR-15 firearm with "We The People" engraved along the barrel. CHAVEZ told the UC that CHAVEZ could also obtain auto sear switches for the rifle, which would transform the rifle into a fully automatic firearm. The UC agreed to purchase the firearm and auto sear switches and sent payment to CHAVEZ. CHAVEZ stated that he would ship the auto sear switches and that LUEVANO would

ship the rifle separately. The UC subsequently spoke to LUEVANO, who confirmed this. The UC received two auto sear switches ("Parcel 16") and the rifle ("Parcel 17"). Fingerprints matching LUEVANO's fingerprints were found on wrapping material inside Parcel 17.

21. Parcel 17 was mailed from Manteca, California (the "Manteca Address"). Parcel 17 also had the following phone number listed in the return address block: (209) 673-5611 (the "5611 Number"). The 5611 Number is associated with Luevano's mother, who resides at a different address in Manteca, California (the "Luevano Manteca Address"). The Luevano Manteca Address is also associated with LUEVANO in that records obtained from PayPal list LUEVANO as residing at the Luevano Manteca Address.

22. In or around December 2020, the UC had several conversations with LUEVANO, via Telegram and text messages, about purchasing another AR-15 .300 Blackout rifle. The UC expressed interested in purchasing this firearm and subsequently sent payment to LUEVANO. The UC subsequently received the firearm ("Parcel 18").

23. In or around January 2021, the UC had several conversations with CHAVEZ, via Telegram, about purchasing a Springfield XD9 9 millimeter firearm and a quantity of methamphetamine. The UC expressed interest in purchasing the firearm and methamphetamine and sent payment to CHAVEZ. CHAVEZ stated that he would ship the firearm and LUEVANO would ship the methamphetamine. This was confirmed with a subsequent conversation, via Telegram, with LUEVANO. The UC received two separate parcels, one of which contained a Springfield XD9 firearm ("Parcel 19") and another which contained approximately 111 grams of a substance containing methamphetamine ("Parcel 20").

24. In or around January 2021, the UC had several conversations with LUEVANO, via Telegram and the 5820 Number, about purchasing MDMA. The UC agreed to purchase a quantity of MDMA and sent payment to LUEVANO. The package ("Parcel 21") was received and found to contain approximately 55 grams of a substance containing MDMA.

25. Between in or around January and February 2021, the UC had conversations with CHAVEZ, during which CHAVEZ offered to sell the UC an AR-15 pistol with a scope. The UC agreed to purchase the firearm and sent payment to CHAVEZ in Bitcoin using a Bitcoin ATM. The firearm ("Parcel 22") was received missing an upper receiver, which was believed to have been lost during shipping.

26. In or around February 2021, the UC had conversations with CHAVEZ, during which CHAVEZ indicated that he had a fully automatic Glock firearm with a metal auto sear switch for sale. The UC agreed to purchase it

and sent payment to CHAVEZ for the firearm with the auto sear switch ("Parcel 23"), which was subsequently received by the UC.

27. In or around February 2021, the UC had conversations with CHAVEZ about CHAVEZ's advertisement of the sale of Glock auto sear switches. The UC agreed to purchase 10 switches and the UC sent payment to CHAVEZ in Bitcoin using a Bitcoin ATM. The UC received a package containing 5 auto sear switches ("Parcel 24"). The additional switches were never received.

28. Between in or around February and March 2021, the UC had conversations with CHAVEZ, during which CHAVEZ indicated that he had an Ithaca sawed-off 12-gauge shotgun and a Springfield XD45 .45 caliber firearm for sale. The UC agreed to purchase both firearms and sent payment to CHAVEZ for the shotgun and the .45 caliber firearm, which were subsequently received by the UC in the same package ("Parcel 25").

29. In or around March 2021, the UC had conversations with LUEVANO, via Telegram and text messages, about purchasing a quantity of MDMA. The UC paid agreed to purchase one ounce of MDMA and sent payment to LUEVANO. The package ("Parcel 26") was received and found to contain approximately 27 grams of substance containing MDMA.

30. In or around April 2021, the UC had conversations with CHAVEZ, via Telegram, during which CHAVEZ stated that had several firearms for sale and offered to sell the UC an AR-15 rifle. The UC sent payment via money orders. The package ("Parcel 27") was shipped from a post office in Turlock, California to NJ Address-2 and was found to contain an AR-15 rifle.

31. In or around June 2021, the UC had conversations with CHAVEZ, via Telegram, about purchasing firearms. CHAVEZ stated that he had a Smith and Wesson 9 millimeter handgun for sale. The UC sent payment via money order to an address in Modesto, California. The package ("Parcel 28") was shipped to NJ Address-2 and was found to contain a Smith and Wesson 9 millimeter handgun.

32. Between in or around November and December 2021, the UC had conversations with CHAVEZ, who was now using the moniker UKTMO on Telegram, in which CHAVEZ offered to sell the UC a red AR-15 300 Blackout firearm. The UC agreed to buy the firearm and sent U.S. currency to an address provided by CHAVEZ. The firearm ("Parcel 29") was subsequently received by the UC.

Identification of CHAVEZ and LUEVANO

33. During the UC's October 2020 purchase of MDMA from LUEVANO (see paragraph 16 above), LUEVANO told the UC that LUEVANO would accept payment through Venmo and PayPal. LUEVANO, using the moniker "The Illest" on Telegram, provided the UC with LUEVANO's personal QR code from Venmo, which listed his username as @Phillip_Luevano and his name as "Phillip Leuvano." Records obtained from Venmo show that the subscriber listed for this Venmo account is Phillip Luevano. LUEVANO provided his email address for payment through PayPal as: luevanophillip@gmail.com (the "Luevano Gmail Address"). Records obtained from PayPal show that the subscriber listed for this email address is Phillip Luevano.

34. In addition, as described above in paragraph 21, the 5611 Number listed on Parcel 17 is associated with Luevano's mother, who resides at the Luevano Manteca Address. Records obtained from PayPal list LUEVANO as residing at the Luevano Manteca address.

35. Records obtained from a mobile payment service show that CHAVEZ has an account with this service, with the following telephone number and email address: (209) 200-1356 (the "1356 Number") and freebands510@icloud (the "freebands 510 iCloud Address"). In addition, the Modesto Address, from which several of the parcels described above were sent, was also associated with this account.

36. Records obtained from Apple, Inc. show that the 1356 Number is associated with the freebands 510 iCloud Account. Furthermore, the freebands510 iCloud Account is associated with Instagram account identifier freebands510_ (the "freebands510 Instagram Account"). Examination of the freebands510 Instagram Account shows the following notation:

Main Account: @free_bands510 (the "free_bands510 Instagram Account").

Records from Instagram show that the free_bands510 Instagram Account is associated with the 1356 Number. Therefore, there is probable cause to believe that the 1356 Number, the freebands 510 iCloud Account, the freebands510 Instagram Account, and the free_bands510 Instagram Account are all being controlled by CHAVEZ.

37. Records for LUEVANO's phone show that LUEVANO has the 1356 Number as being assigned to contact name "Free bands." In addition, telephone number (209) 618 - 9622 (the "9622 Number") was assigned to contact "Bands Bitch," which is believed to be Toni Marin ("Marin"), who was CHAVEZ's girlfriend. The investigation has revealed that Marin resides at an address in Turlock, CA (the "Turlock Address"). The Turlock Address was listed

as the return address on Parcel 12, the AR-15 firearm, which was described above in paragraph 17, and from which CHAVEZ's fingerprints were found inside the box containing Parcel 12.

38. Furthermore, CHAVEZ and Marin were arrested together on July 2, 2021 by the Manteca Police Department. As part of his arrest, CHAVEZ's cell phone was seized.

39. Following the above-described arrest, the Telegram page for TrapMarketOfficial had the following notation:

last seen Jul 02
My ONLY ACCOUNTS ARE @UKTMO @TrapMarketOfficial (ALWAYS CHECK @!!)

On July 10, 2021, there was a Telegram post on the TMO Drug Menu page stating:

"MY ONLY ACCOUNT FOR NOW IS @UKTMO I LOST THE @TrapMarket Official account (for now) IM THE OWNER OF ALL TMO GROUPS SO IF YOUR SKEPTICAL CHECK OR ASK ME TO VERIFY.

40. As described above in paragraph 32, in and around November and December 2021, the UC made arrangements to purchase a red AR-15 300 Blackout firearm (Parcel 29) from CHAVEZ, who was using the UKTMO moniker on Telegram. The firearm is distinct because of its bright red color. On or about December 15, 2021, UKTMO sent a photo of the shipping label pertaining to the AR-15 firearm to the UC. Approximately 2 days earlier, on or about December 13, 2021, the freebands510_ Instagram Account posted a photo of an individual holding the same red AR-15 firearm that the UC received in Parcel 29, thereby confirming that CHAVEZ is the individual who controlled the freebands510_ Instagram Account, the UKTMO moniker, and is the individual who sold the AR-15 firearm to the UC.