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

UNITED STATES OF AMERICA	:	Hon. Edward S. Kiel
	:	
v.	:	Mag. No. 23-15000
	:	
SAVION CLYBURN,	:	CRIMINAL COMPLAINT
COREY JENKINS, JR.,	:	
JULIAN SANTIAGO, and	:	
RICHARD MULLANE	:	

I, Christian Sepulveda, being duly sworn, state that 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 United States Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

/s/ Christian Sepulveda
Christian Sepulveda
Special Agent
U.S. Bureau of Alcohol, Tobacco,
Firearms and Explosives

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1 on January 30, 2023
in the District of New Jersey

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE

/s/ Edward S. Kiel
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Engage in Unlicensed Firearms Dealing and Manufacturing)

From at least as early as in or around December 2022 through the Present, in Passaic and Hudson Counties, in the District of New Jersey, and elsewhere, the defendants,

SAVION CLYBURN,
COREY JENKINS, JR.,
JULIAN SANTIAGO, and
RICHARD MULLANE,

did knowingly and intentionally conspire and agree with each other and with others to engage in the business of manufacturing and dealing in firearms, while not being licensed importers, licensed manufacturers, or licensed dealers of firearms, and committed acts to further the objects of this conspiracy, contrary to Title 18, United States Code, Section 922(a)(1)(A).

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

COUNT TWO
(Engaging in Unlicensed Firearms Dealing and Manufacturing)

From at least as early as in or around December 2022 through the Present, in Passaic and Hudson Counties, in the District of New Jersey, and elsewhere, the defendants,

SAVION CLYBURN,
COREY JENKINS, JR.,
JULIAN SANTIAGO, and
RICHARD MULLANE,

did knowingly and willfully engage in the business of manufacturing and dealing in firearms, while not being licensed importers, licensed manufacturers, or licensed dealers of firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT THREE
(Transferring a Firearm to a Felon)

On or about January 3, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN SANTIAGO,

did knowingly sell and otherwise dispose of a firearm, that is, a privately manufactured 9mm caliber pistol, to a person, namely, CI-3, knowing and having reasonable cause to believe that CI-3 had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 922(d)(1).

ATTACHMENT B

I, Christian Sepulveda, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & 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. 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. A "privately made firearm" ("PMF," also known as a "ghost gun") is a firearm, including a frame or receiver, assembled or otherwise produced by a person other than a licensed manufacturer, and without a serial number or other identifying markings placed by a licensed manufacturer at the time the firearm was produced. The production and transfer of PMFs have proliferated due to the popularity of home-completed and assembled handguns and rifles made from unfinished firearms or receivers. Unfinished frames or receivers that have not yet reached a stage in manufacture where they can properly house fire control components are not "frames or receivers" or "firearms" as defined by the Gun Control Act of 1968 and, therefore, no license is required to make one. An individual can purchase these unfinished frames or receiver billets with relative ease over the internet or via local retailers without the requirement of background checks, recordkeeping, and manufacturer's markings.

2. One method of manufacturing a PMF is through additive manufacturing, commonly known as "3D printing." This method involves constructing of an object from a computer-aided design ("CAD") model or a digital 3D model. It can involve a variety of processes in which material is deposited, joined or solidified under computer control, with material being added together (such as plastics, liquids or powder grains being fused), typically layer by layer. Plans and programs are available to download from the Internet which instruct the 3D printer on the manufacturing process. The design of a 3D firearm is not constrained by conventional manufacturing processes, allowing a weapon to be manufactured in nearly any shape. There are numerous websites and YouTube videos available on the Internet that provide information on 3D printing of firearms. Further, there are many sites with the required 3D printer files available for download. Individuals making the PMF may need to acquire specialized tools, bits, templates, jigs, manuals, and videos to assist in the assembly, which are acquired in interstate and foreign commerce.

3. Since in or around December 2022, ATF, along with state and local law enforcement agencies, have been investigating a gun trafficking network (the "Trafficking Network"), which includes defendants Savion Clyburn ("CLYBURN"), Corey Jenkins, Jr. ("JENKINS"), Julian Santiago ("SANTIAGO"), and Richard

Mullane (“MULLANE”) (collectively, the “DEFENDANTS”), and which operates in and around Passaic and Hudson Counties and elsewhere. The Trafficking Network manufactures and sells PMFs also known as “ghost guns” and traditional firearms. The Trafficking Network manufactures PMFs using various component parts and a 3D printer, and then sells the PMFs for profit.

4. A federal firearm 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 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, none of the DEFENDANTS have received an FFL, and they are accordingly not licensed as dealers, importers, or manufacturers of firearms.

5. During December 2022 and January 2023, law enforcement conducted at least nine controlled purchases which resulted in the recovery of 12 firearms, including 11 PMFs. All of the controlled purchases that are summarized herein were captured by audio-recording or video-recording devices, and all text conversations which are described below have been preserved and reviewed by law enforcement.

6. During the investigation, law enforcement conducted numerous controlled purchases of firearms, as summarized in the chart below:

Date	Defendant(s)	Firearm(s) Purchased	Price Paid
Week of December 18, 2022	CLYBURN JENKINS	Two PMFs	\$2,400
December 28, 2022	SANTIAGO	One PMF	\$1,200
January 3, 2023	SANTIAGO JENKINS	One PMF	\$1,200
January 5, 2023	CLYBURN JENKINS	One PMF	\$1,200
January 7, 2023	SANTIAGO JENKINS MULLANE	One PMF	\$1,200
January 9, 2023	CLYBURN JENKINS MULLANE	Two PMFs	\$2,900
January 17, 2023	CLYBURN JENKINS	Two PMFs	\$2,200
January 17, 2023	CLYBURN	One Kel-Tec SUB-2000 Rifle, bearing Serial No. EGN69	\$2,200

Date	Defendant(s)	Firearm(s) Purchased	Price Paid
January 25, 2023	JENKINS MULLANE	One PMF	\$1,100

7. Preserved text messages show that, during the week beginning on or about December 18, 2022, CLYBURN texted a confidential informant (“CI-1”) regarding two firearms CLYBURN had available for sale—a 9mm 3D-printed firearm with a black frame and gold-colored parts (“FIREARM-1”) and a 9mm 3D-printed firearm with a Polymer 80 frame and a gold barrel threaded for a silencer (“FIREARM-2”). On or about the same week, SANTIAGO texted another confidential informant (“CI-2”) in an attempt to sell the same firearms (FIREARMS-1 and -2) to CI-2.

8. Text messages establish that, on a later date during the week beginning on or about December 18, 2022, CLYBURN agreed to meet CI-1 in Paterson, New Jersey to complete the previously arranged transaction. During a consensually recorded interaction, CI-1 met with CLYBURN and introduced a law enforcement officer posing as a purchaser of firearms (the “UC”). The three individuals then traveled to JENKINS’ residence (the “JENKINS Residence”). En route to the destination, CLYBURN stated that JENKINS manufactured and possessed the firearm that was the subject of the arranged transaction. CLYBURN conveyed that only one of the firearms, FIREARM-1, remained available for purchase. CLYBURN also stated that JENKINS was making a firearm for CLYBURN. Once they arrived at the JENKINS Residence, JENKINS entered the vehicle and gave FIREARM-1 to the UC in exchange for approximately \$1,200. JENKINS and CLYBURN then exited the vehicle and entered the JENKINS Residence, while the UC and CI-1 departed the area. A short while later, CLYBURN texted the UC and informed the UC that he had another firearm available for purchase. The UC and CI-1 returned to the JENKINS Residence and CLYBURN and JENKINS entered CI-1’s vehicle. JENKINS gave FIREARM-2 to the UC for \$1,200.

9. Based on text messages that law enforcement has reviewed and preserved, on or about December 27, 2022, SANTIAGO texted CI-2 that he had a firearm for sale, and they agreed to meet on or around Henry Street in Passaic, New Jersey, the following day to conduct the transaction.

10. On or about December 28, 2022, CI-2 and another confidential informant (“CI-3”) conducted a consensually recorded meeting with SANTIAGO on or around Henry Street, where CI-2 introduced CI-3 to SANTIAGO. CI-2 told SANTIAGO that CI-2 was going to the Dominican Republic, and that CI-3 would send CI-2 the firearms that CI-3 purchased from SANTIAGO. SANTIAGO then sold CI-2 a 9mm 3D-printed firearm with a Polymer 80 frame (“FIREARM-3”) for \$1,200.

11. Text messages establish that, on or about January 3, 2023, SANTIAGO informed CI-3 that he had a firearm for sale, and they arranged to meet on or around Henry Street that day. In a recorded meeting, CI-3 arrived in his/her vehicle on or around Henry Street and SANTIAGO then entered CI-3's vehicle. While CI-3 and SANTIAGO waited for JENKINS, who had the firearm CI-3 intended to purchase, SANTIAGO told CI-3 that he could procure "grips," extended magazines, lasers, and "drums,"¹ among other things. CI-3 told SANTIAGO that he/she intended to use the firearm to shoot someone that he/she knew from a prior term of incarceration. SANTIAGO asked CI-3 if he/she had heard about a new law that would allow an individual to carry a gun without a permit, and CI-3 responded that he/she would not be able to take advantage of such a law, since he/she had prior felony convictions.² SANTIAGO also told CI-3 that he has sold approximately 40 guns for JENKINS. When JENKINS arrived at the location in his vehicle, CI-3 handed SANTIAGO \$1,200. SANTIAGO and JENKINS exited the respective vehicles and entered a residence on or around Henry Street. Several minutes later, SANTIAGO reentered the car and handed CI-3 a 9mm 3D-printed firearm painted silver with green flecks ("FIREARM-4"). As CI-3 later relayed to law enforcement, FIREARM-4 smelled like fresh paint at the time he/she received it.

12. According to preserved text messages, on or about January 5, 2023, CLYBURN told the UC that he had an additional firearm available for \$1,200, and that he would have several more firearms available the following week. The UC agreed to meet with CLYBURN that day, and then drove to the JENKINS Residence. As demonstrated by audiovisual recordings, CLYBURN and JENKINS entered the vehicle, and JENKINS exchanged a 9mm 3D-printed firearm with a skull and rose pattern on the frame ("FIREARM-5") and a 30-round magazine with the UC for \$1,200.

13. On or about January 7, 2023, and prior to a meeting that CI-3 planned with SANTIAGO, law enforcement observed MULLANE arrive at the JENKINS Residence and place a satchel into JENKINS' vehicle immediately before JENKINS and MULLANE drove in the vehicle to Henry Street to conduct a firearms transaction. As observed by law enforcement officers surveilling the controlled purchase, JENKINS and MULLANE arrived on Henry Street several minutes after both SANTIAGO and the UC arrived. Audiovisual recordings then show CI-3 hand SANTIAGO \$1,200. SANTIAGO and JENKINS then exited the respective vehicles and entered a nearby residence. Shortly thereafter,

¹ Based on my training and experience, I understand that the term "grips" commonly refers to firearms and the term "drums" commonly refers to a circular magazine capable of holding a large amount of ammunition.

² CI-3 has a criminal history that includes felony convictions. In other words, CI-3 represented his/herself to be a convicted felon and CI-3 is in fact a convicted felon.

SANTIAGO returned to CI-3's vehicle, handed CI-3 a 9mm 3D-printed firearm with a skull and rose pattern on the frame ("FIREARM-6"), and told CI-3 that he may have additional firearms available for purchase soon.

14. Text messages establish that, on or about January 9, 2023, CLYBURN informed the UC that he had another firearm available for purchase, and they agreed to meet later that day to conduct the transaction. Prior to the time the UC planned to meet CLYBURN to purchase the firearm, law enforcement observed MULLANE arrive at the JENKINS Residence. Law enforcement observed MULLANE exit his vehicle with what appeared to be a weighted L-shaped item in his sweater pocket and then enter the JENKINS Residence. Based on their training and experience, the observing law enforcement officers believed the item to be a firearm. Approximately 40 minutes after MULLANE, the UC arrived outside of the JENKINS Residence, and as captured on audiovisual recordings, JENKINS, with CLYBURN present, sold two 9mm 3D-printed firearms with skull and rose patterns on the frames ("FIREARM-7" and "FIREARM-8") to the UC for \$2,900. JENKINS then said that he likely had four firearms that he could sell to the UC in the near future and stated that "my mans, he makes these shits too, we're in cahoots with each other." Law enforcement officers believe that this statement referred to MULLANE. MULLANE exited the JENKINS Residence several hours after the controlled purchase; law enforcement did not observe the L-shaped object on MULLANE's person at that time.

15. On or about January 17, 2023, the UC arrived at the JENKINS Residence to purchase additional firearms. Recordings show that JENKINS entered the UC's vehicle and then exchanged two 9mm 3D-printed firearms with naked female and broken heart patterns on the frames ("FIREARM-9" and "FIREARM-10") with the UC in exchange for \$2,200. While it was just the UC and JENKINS in the UC's vehicle, JENKINS provided the UC with his cell phone number and stated, "sometimes I don't want to go through him," referring to CLYBURN. Later that day, CLYBURN sent a text to the UC regarding a Kel-Tec SUB-2000 rifle that was available for sale. The UC then met CLYBURN and two uncharged co-conspirators ("CC-2" and "CC-3") during a consensually recorded meeting. Once in the UC's vehicle, CC-2 removed from his sweatpants a collapsed black Kel-Tec, SUB-2000, .40 caliber rifle bearing serial no. EGN69 ("FIREARM-11"). CC-2 handed the rifle to the UC, and the UC handed CLYBURN \$2,200. CLYBURN then gave CC-2 some of the cash UC-1 just provided to CLYBURN.

16. As evidenced by texts, on or about January 24, 2023, JENKINS told the UC that he expected to receive new firearms components the next day, after which he could sell the UC more firearms.

17. As observed by law enforcement officers, on or about January 25, 2023, MULLANE exited his residence in Bayonne, placed one or two medium-sized blue bags into his vehicle, and then drove to the JENKINS Residence. JENKINS grabbed the blue bags from MULLANE's vehicle and reentered his residence; MULLANE drove away before returning to the residence later that day. A short time after JENKINS grabbed the bags from MULLANE's vehicle, JENKINS texted the UC pictures of a 3D-printed firearm and said that it was available. The UC then went to the JENKINS Residence. Once there, JENKINS and MULLANE entered the UC's vehicle and gave a 9mm 3D-printed firearm with a black frame and a gold, threaded barrel ("FIREARM-12") to the UC for \$1,100. While in the UC's vehicle, MULLANE stated that he had previously printed a silencer and that he was saving money to purchase a machine that was capable of 3D printing Glock switches.³ Mullane also said that he wanted to print a firearm that would have "fuck the ATF" imprinted on the frame.

18. Based on law enforcement's review of United States Postal Service records, between approximately November 2022 through early January 2023, CLYBURN, JENKINS, and MULLANE each received packages sent from purveyors of firearms parts:

- a. CLYBURN received at least one such package at his residence, at least as recently as on or about January 3, 2023;
- b. JENKINS received at least 12 such packages at his residence, at least as recently as January 4, 2023; and
- c. MULLANE received at least one such package at his residence, at least as recently as on or about December 15, 2022.

³ A "Glock switch" is a plastic or metal switch that is attached to the rear of the slide component of a Glock firearm to make the firearm fully automatic.