

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CALEB ECCLES-GONSALVES,  
a/k/a "CB,"

Defendant.

**SEALED INDICTMENT**

24 Cr. \_\_

**24 CRIM 391**

**COUNT ONE**

**(Conspiracy to Illegally Possesses and Transfer a Machinegun)**

The Grand Jury charges:

1. From at least in or about July 2023 through at least in or about June 2024, in the Southern District of New York and elsewhere, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, illegal possession and transfer of a machinegun, in violation of Title 18, United States Code, Section 922(o).

2. It was a part and an object of the conspiracy that CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, and others known and unknown, would and did willfully and knowingly possess and transfer a machinegun, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**Overt Acts**

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 6, 2024, ECCLES-GONSALVES sent a series of text messages to ECCLES-GONSALVES's co-conspirator ("CC-1") instructing CC-1 about how to address a United States Postal Service package containing a machinegun conversion device.

b. On or about March 6, 2024, CC-1 mailed a machinegun conversion device from a United States Post Office in St. Petersburg, Florida to Brooklyn, New York.

c. On or about March 7, 2024, ECCLES-GONSALVES sent a text message to a confidential informant (the "CI"), telling the CI, in sum and substance, to travel to ECCLES-GONSALVES's home in Brooklyn, New York, to receive the machinegun conversion device.

d. On or about March 7, 2024, ECCLES-GONSALVES received from the CI payment of approximately \$1,300 in exchange for the machinegun conversion device.

e. On or about May 9, 2024, ECCLES-GONSALVES met with the CI in New York, New York and discussed, in substance and in part, the sale of a second machinegun conversion device.

f. On or about May 28, 2024, another one of ECCLES-GONSALVES's co-conspirators ("CC-2")—who was acting on behalf of ECCLES-GONSALVES—met with the CI in New York, New York, where the CI paid CC-2 \$1,300 for a machinegun conversion device.

g. On or about May 29, 2024, ECCLES-GONSALVES mailed a machinegun conversion device from a United States Post Office in Florida to a particular address in New York, New York. On or about June 1, 2024, the machinegun conversion device was received in New York, New York.

(Title 18, United States Code, Section 371.)

**COUNT TWO**  
**(Possession and Transfer of a Machinegun)**

The Grand Jury further charges:

4. From at least on or about May 9, 2024 through at least on or about June 1, 2024, in the Southern District of New York and elsewhere, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, knowingly possessed and transferred a machinegun, to wit, ECCLES-GONSALVES mailed from a United States Post Office in Florida to a mailbox in New York, New York a part designed and intended solely and exclusively, and a combination of parts designed and intended, for use in converting a weapon into a machinegun.

(Title 18, United States Code, Section 922(o)(1)).

**COUNT THREE**  
**(Conspiracy to Engage in the Unlicensed Business of Dealing in Firearms)**

The Grand Jury further charges:

5. From at least in or about July 2023 through at least in or about June 2024, in the Southern District of New York and elsewhere, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to engage in the unlicensed business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

6. It was a part and an object of the conspiracy that CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, and others known and unknown, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did willfully and knowingly engage in the unlicensed dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate

and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about January 23, 2024, ECCLES-GONSALVES accepted an order from the CI for the purchase of a gun in exchange for approximately \$1,400, which ECCLES-GONSALVES received via a mobile banking application while the CI was in New York, New York.

b. On or about May 9, 2024, ECCLES-GONSALVES met with the CI in New York, New York and discussed, in substance and in part, the manufacture and shipment of a firearm from Florida. Specifically, ECCLES-GONSALVES informed the CI that one of ECCLES-GONSALVES's co-conspirators ("CC-3") was awaiting the arrival of the final parts to complete assembly of the firearm.

c. On or about May 28, 2024, ECCLES-GONSALVES sent a text message to the CI informing the CI, in sum and substance, that the firearm the CI had ordered from ECCLES-GONSALVES was nearly complete. ECCLES-GONSALVES also agreed, in sum and substance, to ship the completed firearm to a particular address in New York, New York.

(Title 18, United States Code, Section 371.)

**COUNT FOUR**  
**(Distribution of Narcotics)**

The Grand Jury further charges:

8. On or about May 9, 2024, in the Southern District of New York and elsewhere, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, knowingly and intentionally

distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

9. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C))

### **FORFEITURE ALLEGATION**

10. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Codes, Sections 981(a)(1)(C) and 924(d)(1), and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses, and any and all firearms and ammunition involved in, used in, or intended to be used in said offenses.

11. As a result of committing the offense alleged in Count Four of this Indictment, CALEB ECCLES-GONSALVES, a/k/a "CB," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

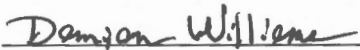
12. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 924;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FORFEITURER

  
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DAMIAN WILLIAMS  
United States Attorney