

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

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi
: :
: : Crim. No. 23-
v. : :
: : 18 U.S.C. § 371
: : 21 U.S.C. § 846
ANGELO CHAVEZ :

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Unlawfully Deal in Firearms)

THE CONSPIRACY

1. From in or around August 2020 to in or around December 2021, in the District of New Jersey and elsewhere, the defendant,

ANGELO CHAVEZ,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly and intentionally conspire and agree with others, to commit an offense against the United States, namely, to willfully engage in the business of dealing in firearms and, in the course of such business, shipped and transported firearms in interstate commerce, contrary to Title 18, United States Code, Section 922(a)(1)(A).

GOAL OF THE CONSPIRACY

2. It was the goal of the conspiracy for the defendant, ANGELO CHAVEZ (“CHAVEZ”), and his co-conspirators to profit by illegally selling firearms without a license in the District of New Jersey.

OVERT ACTS

3. In furtherance of this conspiracy and to effect its unlawful goal, CHAVEZ and his co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

- a. CHAVEZ and his co-conspirators communicated over an encrypted messaging platform with numerous individuals, including an undercover law enforcement agent (the “UC”). During the conversations, CHAVEZ and his co-conspirators advertised various firearms for sale and agreed to ship certain firearms to the UC at an address in New Jersey.
- b. In or around September 2020, CHAVEZ shipped a Springfield Armory .45 caliber firearm (the “Springfield Firearm”), which was determined to have been stolen, to the UC.
- c. In or around October 2020, CHAVEZ shipped a Glock 27 .40 caliber firearm (the “Glock 27”) and an AR-15 firearm (the “AR-15 Firearm”) to the UC.

- d. In or around November 2020, CHAVEZ shipped an AR-15 firearm with an auto sear switch (the “AR-15 Firearm with Auto Sear Switch”) to the UC.
- e. In or around November 2020, CHAVEZ, after agreeing to sell an AK-47 firearm (the “AK-47 Firearm”) to the UC and receiving payment for the AK-47, gave the AK-47 Firearm to a co-conspirator, who then shipped the AK-47 Firearm to the UC.
- f. Between in or around November and December 2020, CHAVEZ and a co-conspirator shipped an AR-15 firearm with “We The People” engraved on the barrel (the “We The People AR-15 Firearm”) and two auto sear switches to the UC.
- g. Between in or around January 2021 and February 2021, CHAVEZ shipped an AR-15 firearm with a scope (the “AR-15 Firearm with Scope”) to the UC;
- h. In or around February 2021, CHAVEZ shipped a fully automatic Glock firearm with an auto sear switch (the “Fully Automatic Glock Firearm”) to the UC;
- i. Between in or around February and March 2021, CHAVEZ shipped a 12-guage shotgun (the “12-Guage Shotgun”) and a Springfield XD45 .45 caliber firearm (the “Springfield XD45 Firearm”) to the UC;

- j. In or around April 2021, CHAVEZ shipped a JP Enterprises, Inc. AR-15 firearm (the “JP AR-15 Firearm”) to the UC;
- k. In or around June 2021, CHAVEZ shipped a Smith and Wesson 9mm firearm (the “S&W 9mm Firearm”) to the UC;
and
- l. Between in or around November and December 2021, CHAVEZ shipped an AR-15 Blackout firearm (the “AR-15 Blackout Firearm”) to the UC.

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

COUNT TWO

(Conspiracy to Distribute Methamphetamine)

From in or around October 2020 to in or around January 2021, in the District of New Jersey and elsewhere, the defendant,

ANGELO CHAVEZ,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a quantity of a mixture and substance containing methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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

FORFEITURE ALLEGATION ONE

1. The allegations set forth in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As a result of committing the firearms offense contrary to Title 18, United States Code, Section 922(a)(1)(A), in violation of Title 18, United States Code, Section 371, as set forth in Count One of this Information, the defendant,

ANGELO CHAVEZ,

shall forfeit to the United States any firearms involved in or used in the commission of such offense, including, but not limited to, the following:

- the Springfield Firearm;
- the Glock 27;
- the AR-15 Firearm;
- the AR-15 Firearm with Auto Sear Switch;
- the AK-47 Firearm;
- the We The People AR-15 Firearm and two auto sear switches;
- the AR-15 Firearm with Scope;
- the Fully Automatic Glock Firearm;
- the 12-Guage Shotgun;
- the Springfield XD45 Firearm;
- the JP AR-15 Firearm;

- the S&W 9mm Firearm; and
- the AR-15 Blackout Firearm.

FORFEITURE ALLEGATION TWO

1. The allegations set forth in Count Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of committing the controlled substance offense contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), in violation of Title 21, United States Code, Section 846, as set forth in Count Two of this Information, the defendant,

ANGELO CHAVEZ,

shall forfeit to the United States of America, 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 the said offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count Two of this Information.

Substitute Assets Provision


(Applicable to all Forfeiture Allegations)

If by any act or omission of the defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.


PHILIP R. SELLINGER
United States Attorney