

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America)

v.)

ALEXANDER CICOLO)

Case No. 15mj 3054 (KAR)

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 July 4, 2015 in the county of Berkshire in the District of Massachusetts, the defendant(s) violated:

Code Section 18 USC 922(g) Offense Description felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit of Federal Bureau of Investigation Special Agent Jeffrey J. Lawrence.

Continued on the attached sheet.

Complainant's signature

Jeffrey J. Lawrence, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/04/2015

Judge's signature

City and state: Shelburne, MA

Katherine A. Robertson, U.S. Magistrate Judge

Printed name and title

Affidavit in Support of
an Application for a Complaint

I, Jeffrey J. Lawrence, state as follows:

Introduction

1. I make this affidavit in support of an application for a federal criminal complaint charging ALEXANDER CICCOLO (“CICCOLO”) with being a felon in possession of a firearm which has traveled in interstate commerce in violation of 18 U.S.C. § 922(g) in Adams, Massachusetts, on July 4, 2015.

Agent Background

2. I am a special agent with the Federal Bureau of Investigation (FBI) and have been employed by the FBI since November of 2006. From 2002 to 2006 I was employed as a special agent with the United States Treasury Department. From 1996 to 2002 I was employed as a state trooper with the Vermont State Police and from 1995 to 1996 as a police officer with the Burlington, Vermont Police Department.
3. Over the course of my employment as a Police Officer, I have conducted and participated in hundreds of criminal investigations which have resulted in arrests for crimes involving homicide, controlled substance violations, firearms violations, manslaughter, home invasion, larceny, assault and battery with a dangerous weapon, breaking and entering, embezzlement, and armed robbery. Many of these crimes resulted in subsequent convictions in State and Federal Courts.
4. I also have written and executed or participated in the planning and execution of State and Federal search warrants which have led to the arrest and conviction of many individuals. These search warrants have resulted in my testimony in State and Federal Courts in Massachusetts and Vermont.

5. As a FBI Agent, I have participated in the planning of Search Warrants and Title III affidavits and applications which have led to the interception of wire and electronic communications and the arrest and conviction of individuals in Massachusetts State and Federal Court.
6. I am currently assigned to the FBI Joint Terrorism Task Force located in Springfield, Massachusetts and have participated in investigations relating to international and domestic terrorism.
7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint.

Basis of Probable Cause

Criminal Conviction

8. According to the criminal docket in case 1428CR000380 in Northern Berkshire District Court, 111 Holden Street, North Adams, MA, on February 17, 2015, CICCULO was convicted of operating a motor vehicle under the influence of liquor in violation of Massachusetts General Laws ("MGL") Chapter 90, Section 24(1)(a)(1). The maximum penalty for a violation of

MGL Chapter 90, Section 24(1)(a)(1) is imprisonment for 30 months. *18 USC § 922(g)(1) makes it unlawful for a person who has been convicted in any court*
Possession of Firearms *for a crime punishable by imprisonment for a term exceeding one year to possess a firearm within*

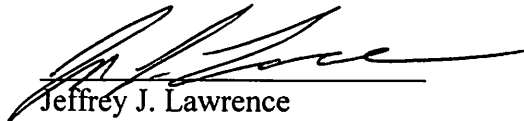
9. On July 4, 2015, I and other members of the FBI Joint Terrorism Task Force (JTTF) arrested *interstate* CICCULO, in Adams, Massachusetts as he was walking and carrying a duffel bag containing *commerce.* four firearm, including:

- a. Glock 17, 9mm pistol bearing serial number AEN683 US

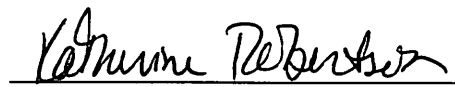
- b. Glock 20, 10 mm pistol bearing serial number WY243UD
- c. Colt AR-15 rifle, .223 caliber serial number 014865
- d. SigArms Model SG550-1, 5.56 caliber rifle serial number 300294

10. All of the firearms possessed by CICCULO on July 4, 2015, previously had traveled in interstate commerce.

11. CICCULO previously had ordered the firearms from a confidential human source ("CHS") working with the FBI. On July 4, 2015, at CICCULO's request, the CHS delivered the firearms to CICCULO in Adams, MA. CICCULO was arrested after he met with the CHS, took delivery of the firearms that he had ordered and was walking away carrying the firearms.


Jeffrey J. Lawrence
Special Agent, FBI.

Subscribed and sworn to before me on July 4th, 2015
in Shelburne, Massachusetts.


Katherine A. Robertson
United States Magistrate Judge

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBI

City Adams, MA Related Case Information:

County Berkshire Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Alexander Ciccolo Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name _____

Address (City & State) Adams, MA

Birth date (Yr only): _____ SSN (last4#): _____ Sex M Race: W Nationality: USA

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA Kevin O'Regan Bar Number if applicable _____

Interpreter: Yes No List language and/or dialect: _____

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date 07/04/2015

Already in Federal Custody as of _____ in _____

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: July 4, 2015

Signature of AUSA: Kevin O'Regan

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Alexander Ciccolo

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 922(g)</u>	<u>felon in possession of a firearm</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

