

STATE OF NEW YORK
COUNTY OF ONONDAGA

COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

JOHN LEONE, JR.

Defendant.

***SEALED
INDICTMENT***
Indict No. 2024-0252 (1)

Index No. 2024-3461

OCTF 21-010S

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Count One

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about the 14th day of September, 2023, through on or about the 12th day of October, 2023, in the Town of Elbridge, County of Onondaga, knowingly and unlawfully sold, exchanged, gave or disposed of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”), a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”), a Polymer80 PF940SC 9mm Luger pistol with no serial number, an Anderson Manufacturing AM-15 semiautomatic rifle having a barrel less than sixteen inches in length.

Count Two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, while not authorized pursuant to law to possess a firearm, unlawfully sold, exchanged, gave or disposed of a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”), to another person.

Count Three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”).

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”).

Count Five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

THIRD DEGREE in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”).

Count Six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowing or having reason to know it was a ghost gun, he sold, gave, exchanged or disposed of a ghost gun, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #1”), to another person.

Count Seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, while not authorized pursuant to law to possess a firearm, unlawfully sold, exchanged, gave or disposed of a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”), to another person.

Count Eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”).

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”).

Count Ten

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”).

Count Eleven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of September, 2023, in the Town of Elbridge, Onondaga County, knowing or having reason to know it was a ghost gun, he sold, gave, exchanged or disposed of a ghost gun, to wit: a Polymer80 PF9SS 9mm Luger pistol with no serial number (“firearm #2”), to another person.

Count Twelve

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, while not authorized pursuant to law to possess a firearm, unlawfully sold, gave, exchanged or disposed of a firearm, to wit: a Polymer80 PF940SC 9mm Luger pistol with no serial number, to another person.

Count Thirteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

SECOND DEGREE in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded Polymer80 PF940SC 9mm Luger pistol with no serial number.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Fourteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga, knowingly possessed a firearm, to wit: a Polymer80 PF940SC 9mm Luger pistol with no serial number.

Count Fifteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: a Polymer80 PF940SC 9mm Luger pistol with no serial number.

Count Sixteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowing or having reason to know it was a ghost gun, sold, gave, exchanged or disposed of a ghost gun, to wit: a Polymer80 PF940SC 9mm Luger pistol with no serial number, to another person.

Count Seventeen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, while not authorized pursuant to law to possess a firearm, unlawfully sold, gave, exchanged or disposed of a firearm to another person, to wit: an Anderson Manufacturing AM-15 semiautomatic rifle having a barrel less than sixteen inches in length.

Count Eighteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed an assault weapon, to wit: an Anderson Manufacturing AM-15 semiautomatic rifle, which has the following assault weapon characteristics: the ability to accept a detachable magazine, a pistol grip that protrudes below the action, a telescoping stock, an attached muzzle device and a threaded barrel.

Count Nineteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: an Anderson Manufacturing AM-15 semiautomatic rifle, serial number 17007990, having a barrel less than sixteen inches in length.

Count Twenty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge, Onondaga County, knowingly possessed a firearm, to wit: an Anderson Manufacturing AM-15 semiautomatic rifle, serial number 17007990, having a barrel less than sixteen inches in length.

Count Twenty-One

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOHN LEONE, JR., of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

THIRD DEGREE in violation of Section 265.02(8) of the Penal Law of the State of New York,
committed as follows:

Said defendant, on or about the 12th day of October, 2023, in the Town of Elbridge,
Onondaga County, knowingly possessed a large capacity ammunition feeding device, to wit: a
magazine that has a capacity of more than ten rounds of ammunition.

Dated: April 15, 2024
Syracuse, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By:

GEOFFREY J. CIERECK
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GRAND JURY FOREPERSON
Dated: April 15, 2024