MWG:MOM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
- X

UNITED STATES OF AMERICA

- against -

GEOFFREY CONTENCIN,

Defendant.

- X

COMPLAINT

(13 U.S.C. § 305(a))

EASTERN DISTRICT OF NEW YORK, SS:

ROBERT PINNISI, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about May 20, 2026, within the Eastern District of New York and elsewhere, the defendant GEOFFREY CONTENCIN did knowingly and intentionally fail to file and submit false and misleading export information through the Shippers Export Declaration ("SED") and the Automated Export System ("AES"), to wit: information relating to the international shipment of firearms magazines and pepper spray from the United States to France.

(Title 13, United States Code, Section 305(a))

The source of your deponent's information and the grounds for his belief are as follows:[1]

[1] Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving drug smuggling, drug trafficking, weapons trafficking, national security, and I have assisted agents in various other types of cases. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The defendant GEOFFREY CONTENCIN is a French citizen who arrived in the United States on or about May 16, 2026.

3. On or about May 20, 2026, the defendant GEOFFROY CONTENCIN was driving in Brooklyn, New York, where he was stopped by New York State Police based on a potential traffic violation of impeding traffic.

4. During the stop, CONTENCIN gave law enforcement agents consent to search his vehicle. Agents searched the vehicle and discovered, among other items: (a) a bullet-proof vest; (b) aerial images of John F. Kennedy International Airport, and (c) a receipt for a United States Postal Service package that had been shipped from a post office in Staten Island, New York.

5. In a post-arrest interview with law enforcement, CONTENCIN waived his Miranda rights and, in sum and substance and in part, admitted to having recently sent firearm magazines via U.S. mail to himself in France. The receipt (described above in paragraph 4) showed that CONTENCIN purchased a package from a post office located in Staten Island, New York and mailed the package to himself in France.

6. On or about May 21, 2026, U.S. Postal Inspectors located and intercepted the package (the "Package") from the mail stream in Brooklyn, New York. The Package was addressed to "Contencin" at a certain address in France. The package also included a customs form completed when mailing that listed the contents as "Pajamas" and "Boxes," despite the fact that the contents of the package were actually firearm magazines.

7. Based on my training and experience, I am aware that international shipments require the filing of export information via the Automated Export System ("AES") for all shipments where a Shipper's Export Declaration ("SED") was previously required. See 15 C.F.R. § 30.1. The customs forms accompanying the Package listed its contents as "Pajamas" and "Boxes."

8. On or about May 22, 2026, the Honorable Peggy Cross-Goldenberg, United States Magistrate Judge, Eastern District of New York, issued a warrant to search the Package for firearms magazines, among other items.

9. Later that day, U.S. Postal Inspectors executed the warrant and searched the Package. The Package contained 13 high capacity 9mm firearm magazines, 5 unopened cans of pepper spray, 1 used can of pepper spray, and a receipt for pepper spray, and not "Pajamas" or "Boxes." A photo of the 13 high capacity firearm magazines taken at the time of the search are shown below.

EDNY SEARCH WARRANT
26-MC-2154
USPS PMI #CH253396411US
CASE #4422542-PMN
May 22,2026

WHEREFORE, your deponent respectfully requests that an arrest warrant issue for the defendant GEOFFREY CONTENCIN, so that he may be dealt with according to law.

ROBERT PINNISI
Special Agent, United States Department of Homeland Security, Homeland Security Investigations

By telephone
Sworn to before me this
22 day of May, 2026

Vera M. Scanlon

~~THE HONORABLE PEGGY CROSS GOLDENBERG~~ THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK