
United States District Court

WESTERN

DISTRICT OF

MISSOURI

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

MICHAEL C. GLOVER

[DOB: 03/02/1990]

Case Number: 11-00032JTM-01

18 U.S.C. §§ 922(g)(1) & 924(a)(2);
[NMT: Ten Years Imprisonment, \$250,000
Fine, Three Years Supervised Release, Plus
\$100 Special Penalty Assessment]

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 17, 2011, in the Western District of Missouri, Michael C. Glover, having been convicted of crimes punishable by imprisonment for terms exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Makarov, 9mm semi-automatic pistol, Serial Number LK07440, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

I further state that I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

(See attached affidavit.)

Continued on the attached sheet and made a part hereof: Yes No

/s/ Darrell Reach

Signature of Complainant

DARRELL REACH

Task Force Officer

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence,

March 18, 2011

Date

at

Kansas City, Missouri

City and State

HONORABLE SARAH W. HAYS

United States Magistrate Judge

Name and Title of Judicial Officer

/s/ SARAH W. HAYS

Signature of Judicial Officer

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

A F F I D A V I T

I, Detective Darrell Reach, being duly sworn, state the following:

1. I am a detective with the Kansas City, Missouri Police Department assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives to assist in the investigation of illegal firearms possession and sales in the Kansas City metropolitan area. Based upon my investigation, along with information provided to me by other officers and detectives from the Kansas City, Missouri Police Department, I believe the following to be true and correct.

2. On March 17, 2011, at approximately 2:15 p.m., the Kansas City, Missouri Police Helicopter Unit was patrolling the St. Patrick's Day Parade. The observer in the helicopter, Police Officer (PO) Stockdale, observed a male in dark clothing with a gold design on the back run north on Broadway from 38th Street, Kansas City, Missouri. PO Stockdale observed the unknown male in the southeast corner of the lot, place a dark object in the corner of the wall that runs west towards Broadway. At that point, PO Stockdale lost sight of the subject as he entered the crowd. PO Stockdale then directed officers on the ground to this location he observed the male place the dark object. The officers on the ground stated that they located a firearm that was a Makarov, Model P-64, 9mm x 18, semi-automatic pistol, Serial Number LK07440. The firearm was loaded with six rounds of ammunition. The Helicopter Unit continued to patrol the area trying to locate the suspect. A few minutes later the Helicopter Unit again observed the same suspect at the same location where the firearm was recovered. PO Stockdale was able to recognize the subject due to the jacket design he had seen earlier. The Helicopter Unit again contacted officers on the ground, who approached the subject. The subject ran from the officers

and after a brief foot chase the subject was taken into custody. The individual was identified as Michael C. Glover, DOB: 03/02/1990.

3. On March 18, 2011, at approximately 12:01 a.m., Glover was advised of his *Miranda* rights and questioned. Glover stated that his cousin had handed him a jacket because his cousin wanted to join in a fight that was taking place. Glover took the jacket and realized there was a pistol in the pocket, Glover stated he knows he is not supposed to be around guns because he was released from Missouri Department of Corrections two weeks ago and is currently on state probation. Glover stated he did not know what to do when police arrived and started breaking up the fight. But when one of the officers told him to “come here” he decided to run. He stated he then took the gun out of his pocket and hid it behind a wall. Glover stated he never touched the gun before hiding it and that his fingerprints and DNA would not be found on the magazine or the ammunition.

4. Based on my police experience, I know the Makarov, Model P-64, 9mm x 18, semi-automatic pistol, Serial Number LK07440 was not manufactured in Missouri and was most likely manufactured in Russia.

5. The criminal history for Michael C. Glover, DOB: 03/02/1990, indicates he has a felony conviction from Jackson County, Missouri, Case Number 1016CR0171801 for the

distribution/manufacture of a controlled substance. Glover received a five year SES conviction on February 8, 2011.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Darrell Reach
DARRELL REACH
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to before me

this 18th day of March, 2011.

/s/ SARAH W. HAYS
HONORABLE SARAH W. HAYS
United States Magistrate Judge
Western District of Missouri

sgs