

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America)
v.)
WILLIAM BERNARD WRIGHT)
a/k/a Quentin Mitchell)
a/k/a Willie Bernard Wright)

Case No. 0:19-mj-00094

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 06/02/2019 in the county of York in the District of South Carolina, the defendant(s) violated:

Code Section 18 U.S.C. § 922(g)(1) Offense Description Felon in Possession of a Firearm

This criminal complaint is based on these facts:

On or about 06/02/2019 William ("Willie") Bernard Wright did violate Federal firearms laws by possessing a firearm and ammunition after having been convicted of a crime punishable by imprisonment of more than one year, as more fully set forth in the attached Affidavit, as incorporated herein.

Continued on the attached sheet.

O.C. Evans III Complainant's signature

ATF Special Agent O.C. Evans III Printed name and title

Sworn to before me and signed in my presence.

Date: 06/06/2019

Shiva V. Hodges Judge's signature

City and state: Columbia, South Carolina

Shiva V. Hodges, United States Magistrate Judge Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

1. I, O.C. Evans III, being duly sworn, depose and state that I am a Special Agent with the Federal Bureau of Alcohol, Tobacco, Firearms and Explosives, U.S. Department of Justice (ATF). I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known by the government concerning criminal activities committed by the defendant.
2. I am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered to conduct investigations of and to make arrests for the offenses enumerated in Titles 18, 19, 21, 26 and 31, of the United States Code and other related offenses. I am a Special Agent with ATF, and have been so employed since July of 2014. I am currently assigned to the Columbia, South Carolina Field Office. My duties involve the investigation of Federal firearms offenses and associated violent crime and narcotics offenses.
3. Prior to serving as an ATF Special Agent, I was a Commissioned Officer in the United States Army Military Police Corps. After leaving the Army, I was employed by the Department of State, Bureau of Diplomatic Security as a Security Protective Specialist at the US Embassy in Baghdad, Iraq. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. I also have a Bachelor's Degree in Criminal Justice from The Citadel.
4. As a result of my training and experience as an ATF Special Agent, I am familiar with federal criminal laws and know that the following is a violation 18 U.S.C. § 922(g)(1)

FEDERAL OFFENSE UNDER INVESTIGATION

5. This affidavit is made in support of my belief that William ("Willie") Bernard Wright has committed the following offense in the District of South Carolina:
 - Felon in possession of a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1)

JUNE 2, 2019 STATE ARREST OF WRIGHT

6. I have learned that on June 2, 2019 at approximately 7:49 P.M., Trooper P.A. Wise with the South Carolina Highway Patrol was on routine patrol in York County travelling on Mount Gallant Road. Trooper Wise observed a driver operating a BMW and observed that the driver was unrestrained (not wearing a seat belt) as he was operating the vehicle. Trooper Wise then attempted to conduct a traffic stop on the vehicle, at which time the driver turned into a housing development off Mount Gallant Road.
7. Trooper Wise then activated his blue lights and at that time, the driver refused to stop. The driver turned onto Lexi Lane and then turned backed onto Mount Gallant Road in an attempt to elude Trooper Wise. Trooper Wise then notified the South Carolina Highway Patrol Dispatch Center that he was in pursuit of the vehicle traveling on Mount Gallant Road

travelling towards India Hook Road. The driver made a left turn onto India Hook Road and travelled North towards the area where the road dead-ends.

8. When the driver reached the dead-end of India Hook Road, the driver exited his vehicle, drew a firearm, pointed the firearm at Trooper Wise, and discharged at least twelve rounds.
9. Trooper Wise was struck in his ballistic vest in the chest area and sustained other injuries to the right side of his neck from foreign debris. Trooper Wise exited his vehicle, returned fire, striking the driver, ordered the driver to the ground, and the driver then lowered to the ground. Trooper Wise then called for backup.
10. The driver has been identified as William Bernard Wright (WRIGHT), the subject of the requested Criminal Complaint. WRIGHT was taken into custody without further incident. Due to his injuries, WRIGHT was transported to a medical facility in Charlotte, North Carolina to receive medical treatment.
11. On June 6, 2019, I confirmed with the South Carolina State Law Enforcement Division that the following charges are pending against WRIGHT in the state system for the conduct described above: (1) Attempted Murder; (2) Weapons Possession by a Person Convicted of a Violent Felony; and (3) Possession of a Weapon During a Violent Crime.
12. I reviewed the vehicle dash camera video from Trooper Wise's patrol vehicle. This video is approximately 30 minutes and 50 seconds in length. This summary of key events is not intended to be a verbatim transcript of the recording. The times listed are the approximate minutes and seconds into the video when the summarized statement or event occurs. The following is a brief summary of the events captured by Trooper Wise's vehicle dash cam video.
 - a. At 0 minutes and 20 seconds, Trooper Wise appears to pull out from a stationary position onto a roadway. Shortly after, Wise turns left into a housing complex.
 - b. At 0 minutes and 55 seconds, Trooper Wise activates his patrol vehicle sirens. Shortly after, a silver BMW makes a right turn through a stop sign and fails to stop for the officer's sirens.
 - c. At 1 minute and 22 seconds, the silver BMW makes a right turn out of the housing complex and onto a roadway and begins to travel at a high rate of speed. Trooper Wise continues his pursuit. Shortly after, Trooper Wise makes a left turn in continued pursuit of the vehicle and announces to dispatch that they are travelling on a dead-end road.
 - d. At 2 minutes and 55 seconds, Trooper Wise begins to bring his patrol vehicle to a stop behind the silver BMW, which appears to have come to a stop at the end of a dead-end road.
 - e. As Trooper Wise is bringing his patrol vehicle to a stop, the video captures WRIGHT leaving the driver's door area of the silver BMW with a firearm in his right hand. The firearm is drawn and pointing toward the front windshield of Trooper Wise's patrol vehicle. WRIGHT then moves quickly from the silver BMW towards the passenger area of the Trooper Wise's patrol car while firing numerous rounds from his brandished firearm.
 - f. Shortly after, Trooper Wise begins to call out commands for WRIGHT to not move and to put his hands up. Trooper Wise then reports to dispatch, "He is laying down on the road."

CRIMINAL HISTORY

13. I have obtained a NCIC criminal history for WRIGHT, cross-referenced the York County 16th Judicial Circuit Public Index, and I have reviewed the certified sentencing sheets from the York County Clerk of Court and was able to determine that prior to June 2, 2019, WRIGHT was convicted of the following felony offenses, among others, each of which are a crime punishable by imprisonment for a term exceeding one year in the state of South Carolina:
- a. 2013 conviction of Attempted Armed Robbery;
 - b. 2013 conviction of Attempted Murder; and
 - c. 2013 conviction of Criminal Conspiracy.
14. On June 6, 2019, Julie Dunn with the South Carolina Department of Probation, Parole and Pardon Services confirmed that WRIGHT has not received a pardon for the foregoing convictions or had his rights to possess a firearm or ammunition restored as of the date of this affidavit.

INTERSTATE NEXUS OF FIREARM AND AMMUNITION


15. The firearm recovered from the scene is a FN Herstal, model Five-Seven semi-automatic 5.7 x 28 millimeter pistol bearing serial number 386348740. It was recovered in close proximity to WRIGHT. Twelve 5.7 x 28mm spent cartridge casings were recovered in close proximity to the firearm. When recovered, the firearm had one round in the chamber.
16. I have made a determination of the international and/or interstate travel of the firearm recovered from the scene. On June 5, 2019, Special Agent Chris Baker, an ATF Nexus-trained Special Agent, confirmed that the firearm described herein was a firearm as defined in 18 U.S.C. § 921(a)(3) and that the firearm was manufactured in Belgium. Accordingly, it was Special Agent Baker's opinion, based on his knowledge, training, experience, and research that because the firearm was recovered in South Carolina, the firearm has necessarily traveled in and affected interstate commerce as defined in 18 U.S.C. § 921(a)(2).

CONCLUSION

17. Based on the foregoing facts and circumstances, which I believe to be true and accurate to the best of my knowledge, I respectfully submit that there is probable cause to believe that WRIGHT did on or about June 2, 2019 violate 18 U.S.C. § Section 922(g)(1), by possessing a firearm after being convicted of a crime punishable by a term of imprisonment exceeding one year. In consideration of the foregoing, I respectfully request that this Court issue a Criminal Complaint and Arrest Warrant for WILLIAM BERNARD WRIGHT.


Assistant United States Attorney Elliott B. Daniels has reviewed this affidavit.

< signature blocks to follow >



O.C. Evans III
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives (ATF)

Sworn to and subscribed before me this 6th day of June 2019.



SHIVA V. HODGES
UNITED STATES MAGISTRATE JUDGE
Columbia, South Carolina