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The Honorable John L. Weinberg

JUL 23 2019

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOEY A. MAILLET,
Defendant.

No. MJ19-338
COMPLAINT for VIOLATION
18 U.S.C. §§ 922(u)

BEFORE the Honorable John L. Weinberg, United States Magistrate Judge, U.S.
District Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Theft of Firearm from Federal Firearms Licensee)

22 On or about May 3, 2019, in Bow, Skagit County, within the Western District of
23 Washington, JOEY MAILLET, did knowingly steal and unlawfully take and carry away
24 from the premises of a person who is licensed to engage in the business of dealing in
25 firearms, specifically All American Armory, a firearm in the licensee's business
26 inventory, to wit: a Ruger Model SR-556 5.56x45mm NATO caliber rifle bearing serial
27 number 591-21649, and others, which had been shipped and transported in interstate and
28 foreign commerce.

1 All in violation of Title 18, United States Code, Section 922(u) and 924(i)(1).

2

3 **COUNT 2**

4 ***(Theft of Firearm from Federal Firearms Licensee)***

5 On or about April 13, 2019, in Sequim, Clallam County, within the Western
6 District of Washington, JOEY MAILLET, did knowingly steal and unlawfully take and
7 carry away from the premises of a person who is licensed to engage in the business of
8 dealing in firearms, specifically Fred's Gun Shop, a firearm in the licensee's business
9 inventory, to wit: a Glock Pistol, model 48, chambered in 9mm, bearing serial number
10 BLGB685, and others, which had been shipped and transported in interstate and foreign
11 commerce.

12 All in violation of Title 18, United States Code, Section 922(u) and 924(i)(1).

13

14 The undersigned complainant, Elliott J. Prose, Special Agent, being first duly
15 sworn on oath, hereby deposes and says:

16 **TRAINING AND EXPERIENCE**

17 1. I am an "investigative or law enforcement officer of the United States"
18 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of
19 the United States who is empowered by law to conduct investigations of, and to make
20 arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

21 2. I am a Special Agent (SA) with the United States Department of Justice
22 (DOJ), Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so
23 employed since May 14, 2017. I am currently assigned to the Seattle Field Office, in
24 Seattle, Washington where I am assigned to the ATF Violent Crime Task Force. In this
25 capacity, I enforce federal criminal laws relating to the possession and trafficking of
26 firearms. Prior to my employment with ATF, I served as a Police Officer with the
27 Washington DC Metropolitan Police Department in Washington, DC from November
28 2008 until December 2010. I also served as a Federal Air Marshal from December 2010

1 until May 2017. While employed as a Federal Marshal, I received a Master of Science
2 from the University of Cincinnati in Criminal Justice with a Criminal Analysis emphasis.
3 I received formal training from the Federal Law Enforcement Training Center in Glynco,
4 Georgia, Criminal Investigators Training Program, which familiarized me with basic
5 narcotics investigations, drug identification and detection, United States narcotics laws,
6 financial investigations and money laundering, identification and seizure of drug-related
7 assets, organized crime investigations, physical and electronic surveillance, and
8 undercover operations. In addition, I successfully completed a fourteen-week ATF
9 Special Agent Basic Training course in Glynco, Georgia, which included comprehensive,
10 formalized instruction in, among other things, firearms identification, firearms
11 trafficking, arson and explosives, and tobacco and alcohol diversion.

12 3. This Affidavit is made based upon my personal knowledge, training,
13 experience and investigation, as well as upon information provided to me and my review
14 of reports prepared by other law enforcement personnel. This Affidavit is made for the
15 purpose of establishing probable cause for this Complaint and thus does not include each
16 and every fact known to me concerning this investigation.

PURPOSE OF AFFIDAVIT

17 4. This Affidavit is made in support of a Complaint against JOEY A.
18 MAILLET for two counts of Theft of Firearms from a Federal Firearms Licensee, in
19 violation of Title 18, United States Code, Section 922(u).

INVESTIGATION AND PROBABLE CAUSE

20 5. On Saturday, April 13, 2019, at approximately 11:30 p.m., Clallam County
21 Sheriff's Office (CCSO) Deputies and Sequim Police Department (SPD) Officers were
22 dispatched to a burglary of Fred's Guns located at 261340 US-101 in Sequim, WA.
23 Fred's Guns is a Federal Firearms Licensee (FFL) that is engaged in the business of
24 selling firearms and ammunition. Upon arriving at Fred's Guns, CCSO Deputies and SPD
25 Officers observed that the store's front door along with the door frame and dry wall had
26 been destroyed. CCSO Deputies and SPD Officers entered the business through the
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1 destroyed entrance and cleared the business of potential suspects. Once law enforcement
2 officers determined the location was safe, they secured the exterior and interior of the
3 store and quarantined the area to prevent contamination of the crime scene.

4 6. On Sunday, April 14, 2019, CCSO personnel contacted ATF for assistance
5 with conducting the investigation. ATF Special Agents (SAs) and Task Force Officers
6 (TFOs) arrived at the scene to assist CCSO with the investigation. Upon ATF SAs and
7 TFOs arriving on the scene, CCSO requested that ATF be the lead agency in
8 investigating the FFL burglary. The Washington State Patrol (WSP) was also requested
9 and arrived at Fred's Gun store to process the crime scene. All crime scene evidence was
10 secured by WSP and transported to WSP facilities for safekeeping.

11 7. ATF SAs and TFOs reviewed surveillance footage from Fred's Guns that
12 showed a lone male crash a large construction vehicle (later identified as a "Front
13 Loader") into the front door of Fred's Guns. The then-unidentified male had his face
14 covered. He attempted to jump over a display case that held some pistols. The glass top
15 of the display case shattered, and the male fell inside. After extricating himself, the male
16 quickly began grabbing firearms from the broken display case. He then intentionally
17 broke another glass display case, and began rapidly removing those firearms as well,
18 putting them all into a large duffel-type bag. The video showed that the male did not wear
19 any gloves while lifting guns out of the display cases and destroying the cases.

20 8. Investigators collected glass and other materials from the broken display
21 cases. Some of the glass appeared to have blood on it; some of the materials appeared to
22 be made of a material from which latent fingerprints may be able to be developed. These
23 items were sent to the WSP Crime Laboratory for further examination and analysis.

24 9. On Monday, April 15, 2019, ATF Industry Operation Investigators (IOIs)
25 arrived on the Scene of Fred Guns to conduct an inventory and determine what firearms
26 had been stolen. On April 25, 2019, IOIs completed their firearms inventory of Fred's
27 Guns and confirmed that twenty-six firearms, all pistols, were stolen from the gun store
28

1 the evening of April 13, 2019. Based on the IOI inventory, it was determined that the
2 following twenty-six firearms had been stolen:

- 3 a. a Glock Model 43 – 9mm – S/n: BKDH063;
- 4 b. a Beretta Model 92F – 9mm – S/n: C63202Z;
- 5 c. a Beretta Model 21A – 9mm – S/n: BB543429U;
- 6 d. a Glock Model 45 – 9mm – S/n: BCLU046;
- 7 e. a Glock Model 19 – 9mm – S/n: BGUS578;
- 8 f. a Glock Model 19 – 9mm – S/n: BGVW193;
- 9 g. a Glock Model 19 – 9mm – S/n: BGVW192;
- 10 h. a Glock Model 43 – 9mm – S/n: BKGM006;
- 11 i. a Glock Model 19 – 9mm – S/n: BKGM028;
- 12 j. a Para Ordnance Model P14-45 - .45 – S/n: TJ8195;
- 13 k. a Glock Model 26 – 9mm – S/n: PRS935;
- 14 l. a Sig Sauer Model 1911 - .45ACP – S/n: 54A033103;
- 15 m. a S&W Model 380EZ – 36/1ALP – S/n: NDN0202;
- 16 n. a S&W Model 380EZ – 36/1ALP – S/n: NDP1842;
- 17 o. a Walther Model PPK/S – 9mm – S/n: 8879BAB;
- 18 p. a S&W Model M&P – 9mm – S/n: DVH7570;
- 19 q. a S&W Model 3913 – 9mm – S/n: VCR4179;
- 20 r. a Glock Model G48 – 9mm – S/n: BLGM582;
- 21 s. a Sig Sauer Model P365 – 9mm – S/n: 66A116410;
- 22 t. a Glock Model G48 – 9mm – S/n: BLGB685;
- 23 u. a S&W Model M&P Shield – 9mm – S/n: JAY1104;
- 24 v. a S&W Model M&P Shield – 9mm – S/n: JBH0046;
- 25 w. a S&W Model M&P Shield – 9mm – S/n: JBH0023;
- 26 x. a Glock Model 43X – 9mm – S/n: BKX2304;
- 27 y. a Aero Precision Model M5 - .308 – S/n: US78980; and
- 28 z. a Canik Model TP9 Elite Combat – 9mm- S/n: T6472-18-BN03213.

1 10. On May 9, 2019, ATF SA Elliott Prose began receiving multiple forensic
2 reports from the WSP Crime Laboratory to include DNA and fingerprint comparisons.
3 WSP crime scene technicians processed DNA from blood found at the crime scene of
4 Fred's Guns and submitted it through the Federal Bureau of Investigation's (FBI)
5 Combined DNA Index System (CODIS) to be evaluated. The WSP lab received a hit
6 from CODIS that the blood collected from the Fred's Guns Crime Scene matched JOEY
7 A. MAILLET with the same date of birth as the person charged herein. Later, SPD
8 Detectives Rick Larsen and Matthew McMillen obtained a buccal swab directly from
9 JOEY A. MAILLET while he was in custody at the Snohomish County Jail (discussed
10 further below) and submitted it to the lab, which confirmed the DNA profile obtained at
11 the Fred's Guns crime scene matched the DNA profile of JOEY A. MAILLET.

12 11. The Crime Lab also sent SA Prose and Det. McMillen a fingerprint
13 examination report comparing a latent fingerprint developed from a light bar in the west
14 display case of Fred's Guns to the known fingerprints JOEY A. MAILLET. The Crime
15 Lab confirmed that both sets of fingerprints were made by the same individual.

16 12. While the Fred's Guns investigation was ongoing, another Federal Firearms
17 Licensee was burglarized in Bow, Washington. Specifically, on May 3, 2019, ATF and
18 the Skagit County Sheriff's Office (SCSO) were notified of a burglary at All American
19 Armory, an FFL in Bow, Washington, that is engaged in the business of selling firearms
20 and ammunition. ATF Special Agents, including SA Greg Heller, initiated an
21 investigation into that gun store burglary.

22 13. ATF SAs learned that employees arrived at All American Armory on the
23 morning of May 3, 2019, to find that a suspect had damaged the front door, entered the
24 business, and stolen firearms.

25 14. SCSO Deputies and Detectives, along with ATF SAs, including SA Greg
26 Heller, responded to the scene at 14969 West Bow Hill Road in Bow, Washington. From
27 interviewing employees at the scene, investigators learned that the business had been
28 locked up at approximately 6:00 p.m. on May 2, 2019, when the last employee left. The

1 first employee arrived at approximately 8:45AM on May 3, 2019, and found the front
2 door damaged. The employees could tell that someone had entered the business and had
3 stolen firearms.

4 15. ATF SAs obtained surveillance footage of the burglary, which by
5 comparing the timestamp on the video to the correct time, they determined had taken
6 place at approximately 2:00 a.m. on May 3, 2019.

7 16. The footage showed a vehicle back into the front door, shattering it. A
8 single suspect was seen throwing a trash can through the door, entering, and quickly
9 placing rifles and ammunition into the can. The suspect then exited the front door with
10 the trash can. The vehicle appeared to drive away.

11 17. ATF Industry Operations personnel met with employees at the store and
12 assisted with completing the inventory. Based on the conducted inventory, it was
13 determined that the following thirteen firearms had been stolen:

- 14 a. a DPMS Model LR-308 .308 caliber rifle s/n:131462;
- 15 b. a Del-Ton Model Sierra 5.56x45mm rifle s/n: DTI-S183872;
- 16 c. a Anderson Model AM-15 5.56x45 rifle s/n: 18178247;
- 17 d. a Rock River Arms Model LAR15 5.56x45 rifle s/n: CM202509;
- 18 e. a Rock River Arms Model LAR15 5.56x45 rifle s/n: KT1022506;
- 19 f. a Professional Ordnance Model AR15 5.56x45 rifle s/n: C05373;
- 20 g. a Ruger Model SR-556 5.56x45 rifle s/n: 591-21649;
- 21 h. a Windham Weaponry Model WW-15 5.56x45 rifle s/n:
WW221314;
- 22 i. a Lancer Systems Model L15 Multi caliber rifle: s/n: LS00123;
- 23 j. a Utas Model UTS-15 12 gauge shotgun s/n: US12P11700;
- 24 k. a DPMS Model A-15 Multi caliber rifle s/n: FE015503K;
- 25 l. a Palmetto State Armory Model PA-15 .223 Wylde caliber rifle s/n:
SCD040064; and
- 26 m. a PWA Model Commando 5.56x45 rifle s/n:42627.

1 18. Mid-morning on May 3, 2019, a Washington State Parks ranger
2 encountered a 2002 Ford F150 with Washington license plate C02511L at 7200 Birch
3 Bay Drive in Birch Bay State Park near Blaine, Washington. The truck was damaged as if
4 it had been in a collision. Broken glass was observed in the truck bed. The keys were
5 located in the vehicle. A large sack of potatoes, several .40 caliber rounds, a gray trash
6 can, and an electric boat motor and battery were located in the vehicle.

7 19. On May 4, 2019, the vehicle was impounded by the ranger, as it appeared
8 abandoned in the parking lot.

9 20. On May 5, 2019, an individual contacted SCSO and reported his 2002 Ford
10 F150 with Washington license plate C02511L had been stolen from Samish Bay Cheese,
11 a farm at 15115 Bow Hill Road in Bow, Washington, just .1 miles from All American
12 Armory. The truck owner explained the truck was parked in a barn loaded with potatoes
13 several days earlier, and he had just discovered it was missing.

14 21. When a SCSO deputy entered the vehicle into that National Crime
15 Information Center (NCIC), he learned the vehicle had already been located by the ranger
16 and impounded.

17 22. On May 6, 2019, SCSO detectives learned of the vehicle theft and
18 recovery. As Samish Bay Cheese was so close to All American Armory, and due to the
19 circumstances of the recovery, they believed the truck was likely related to the burglary.
20 The detectives learned that the owner had already picked up the truck and its contents
21 from the impound lot. They contacted the owner and asked him not to use the truck any
22 further.

23 23. On May 7, 2019, SCSO detectives met with the truck's owner at the
24 Samish Bay Cheese farm. The owner explained that the truck had been stolen from where
25 it was parked inside a barn on the farm. He said the keys had been left inside the vehicle.
26 The owner explained that he picked up the vehicle and all its contents from the impound
27 lot. He showed the vehicle and its contents to the detectives and explained that there were
28 several items in the truck that had not been there when it was stolen. These items

1 included: a gray trashcan with a yellow label that read, "Tool & Parts"; a Minn Kota
2 brand Endura Max electric trolling motor with serial number Q203MK00131; and an
3 Interstate Batteries brand Marine / RV battery The trashcan matched the one the burglary
4 suspect was seen using on the surveillance video, and was taken from a post office
5 adjacent to All American Armory.

6 24. On May 10, 2019, Ferndale Police Department (FPD) Officer Joshua Scott
7 encountered JOEY A. MAILLET wearing a backpack and riding a bicycle in the area of
8 5200 Creighton Road in Ferndale, Washington. Ofc. Scott arrested JOEY A. MAILLET
9 based on an outstanding arrest warrant for Burglary issued from Everett, Washington.

10 25. During a search of JOEY A. MAILLET incident to arrest, the officer
11 located a small amount of suspected methamphetamine and a box of ammunition. When
12 JOEY A. MAILLET was booked into the Whatcom County Jail, the officer impounded
13 JOEY A. MAILLET's backpack and bicycle for safekeeping.

14 26. Ferndale Police officers were aware that on May 3, 2019, a resident of 5201
15 Labounty Drive in Ferndale, Washington contacted FPD to report that an unknown
16 suspect had stolen a Minn Kota trolling motor and an Interstate Batteries brand battery
17 from a boat parked on his property. The victim had surveillance footage of the theft,
18 which showed that it took place at approximately 2:58 a.m. on May 3, 2019. The victim
19 provided FPD with copies of the surveillance footage and photos of the stolen motor.
20 Photos of the suspect were distributed to FPD officers.

21 27. When Officer Scott arrested JOEY A. MAILLET for his warrant on May
22 10, 2019, officers recognized him as the suspect depicted in the surveillance footage from
23 the boat motor and battery theft. After JOEY A. MAILLET had been advised of his
24 *Miranda* warnings, officers asked him about his involvement in the theft. JOEY A.
25 MAILLET initially denied committing the theft. However, after officers showed him a
26 photo of him extracted from the surveillance video, JOEY A. MAILLET confessed that
27 he had stolen the motor and the battery.

1 28. JOEY A. MAILLET claimed he had taken the motor and the battery and
2 placed them behind a nearby structure. Officers took JOEY A. MAILLET to the location
3 he described, but did not locate the stolen items.

4 29. Pursuant to the ATF and Clallam County Sheriff's Office (CCSO)
5 investigations of the burglary at Fred's Guns, on May 15, 2019, SPD Det. Larsen
6 obtained a Clallam County Superior Court search warrant authorizing the search of JOEY
7 A. MAILLET's backpack, which was still in safekeeping at the Ferndale Police
8 Department.

9 30. On May 15, 2019, SA Prose, Det. McMillen, and Det. Larsen attempted to
10 interview JOEY A. MAILLET about the Fred's Guns burglary while he was in custody in
11 Whatcom County. JOEY A. MAILLET immediately invoked his right to counsel and all
12 questioning was stopped.

13 31. Later that same day, Det. Larsen executed the search warrant on JOEY A.
14 MAILLET's backpack. Det. Larsen located a wallet containing paperwork and cards,
15 including an RBC bank card in JOEY A. MAILLET's name. Det. Larsen also located and
16 seized the following:

- 17 a. a price tag for a PWA Commando 5.56 caliber rifle, showing a price
18 of \$849.00;
- 19 b. a hanging information tag for Windham Weaponry rifles;
- 20 c. a Walmart Receipt;
- 21 d. a box of 200 Savage Arms .17HMR caliber ammunition with a
22 "Varmint Tip," with a small white price tag with red lines above and below
23 the price and showing the first three digits of the price as "49.9" (the
24 remainder of the price was illegible).

25 32. SA Prose requested that SA Heller review the firearms stolen from All
26 American Armory during the burglary in light of the materials found in JOEY A.
27 MAILLET's backpack. SA Heller noticed that one of the stolen rifles was a PWA
28

1 Commando 5.56x45mm rifle; its All American Armory price was \$849.00. SA Heller
2 also noticed one of the items stolen was a Windham Weaponry WW-15 rifle.

3 33. SA Prose and Det. McMillen took the tags recovered from JOEY A.
4 MAILLET's backpack to All American Armory. They met with the store manager. SA
5 Prose showed the manager the PWA Commando tag recovered from JOEY A.
6 MAILLET's backpack, and the manager recognized it as an All American Armory tag.
7 SA Prose compared the Commando tag to tags on another items in the store. The type
8 and style appeared to match.

9 34. SA Prose also showed the manger the hanging information tag for
10 Windham Weaponry rifles. The manager recognized it as something that would have
11 been attached to the Windham Weaponry WW15 rifle that was stolen from the store
12 during the May 3 burglary.

13 35. SA Prose also showed the manager a photograph of the box of .17HMR
14 caliber ammunition. Based on the price tag style and placement, the manager recognized
15 it as an All American Armory tag. SA Prose took a photograph of another box of
16 ammunition in stock at the store and compared it to the box recovered from JOEY A.
17 MAILLET. The style and placement of the price tag appeared to match the one on the
18 box recovered from JOEY A. MAILLET.

19 36. The manager checked the store's inventory system for Savage Arms
20 .17HMR ammunition and saw that two boxes should be in stock. The manager checked
21 the store and found only one. It appeared that, after the burglary, one was missing. The
22 price on the remaining box of ammunition was \$49.99, which matched the price on the
23 box recovered from JOEY A. MAILLET.

24 37. When SA Heller learned of JOEY A. MAILLET's arrest and his possession
25 of items associated with All American Armory, SA Heller further investigated the
26 circumstances surrounding the boat motor theft.

27 38. SA Heller obtained copies of FPD records related to the theft case. He saw
28 the photos of the trolling motor provided by the owner matched the photos SCSO took of

1 the motor recovered from the stolen pickup truck. The only apparent difference was that
2 one sticker on the top of the motor that was present in the owner's photos was missing in
3 the SCSO photos. However, the SCSO photos showed (and SA Heller saw when he later
4 examined the motor) that there was a ring where the sticker had been that showed the
5 sticker had been removed or had worn off.

6 39. SA Heller noted that the boat motor theft had taken place approximately
7 one hour after the All American Armory burglary. SA Heller saw that, per
8 google.com/maps, the drive from All American Armory to 5201 Labounty Drive
9 Ferndale, Washington (the theft location) was approximately 29 miles and was estimated
10 to take approximately 32 minutes. SA Heller saw that Ferndale, Washington was between
11 All American Armory and Birch Bay State Park, where the stolen truck was recovered.

12 40. SA Heller obtained a copy of the boat motor theft surveillance video. He
13 saw that the suspect in the high quality video of the theft did indeed appear to be JOEY
14 A. MAILLET. He noticed that, during the theft, JOEY A. MAILLET was wearing a ball
15 cap with a circle shaped emblem on the front. He also saw the cap had a black or dark
16 colored strap on the back. SA Heller also saw that JOEY A. MAILLET was wearing
17 gloves that were dark on the palms and light colored on the rest of the hand.

18 41. When SA Heller again reviewed the surveillance footage from the burglary
19 at All American Armory, he saw the burglary suspect also appeared to be wearing a cap
20 with an emblem on the front and a dark strap on the back. The burglary suspect also
21 appeared to be wearing light colored gloves with dark palms.

22 42. On May 20, 2019, Det. McMillen placed JOEY A. MAILLET under arrest.
23 He and SA Prose transported JOEY A. MAILLET from the Snohomish County Jail to the
24 Clallam County Jail.

25 43. On May 31, 2019, SA Heller met with JOEY A. MAILLET at the Clallam
26 County Jail. SA Heller read JOEY A. MAILLET his *Miranda* warnings and attempted to
27 interview him about the All American Armory burglary. JOEY A. MAILLET claimed he
28 did not know where Bow, Washington was and said he did not have firearms. JOEY A.

1 MAILLET admitted to stealing the boat motor, but said he did not do anything else
2 wrong. After only a few minutes, JOEY A. MAILLET requested an attorney, so SA
3 Heller terminated the interview.

4 44. SA Heller has reviewed ATF records that indicated that All American
5 Armory at 14969 West Bow Hill Road had an active Federal Firearms License (FFL).
6 The FFL was renewed on September 5, 2017 and did not expire until October 1, 2020.

7 45. SA Prose has reviewed ATF records that indicated that Fred's Guns in
8 Sequim also had an active FFL at the time of the burglary in April 2019.

9 46. ATF SA Catherine Cole had additional training in determining the location
10 of a firearm's manufacture. SA Heller consulted with SA Cole, who conducted research
11 and confirmed that Ruger firearms (to include the Ruger Model SR-556 5.56x45mm
12 NATO caliber rifle with serial number 591-21649 stolen from All American Armory in
13 this case) were not manufactured in Washington.

14 47. On July 19, 2019, SA Prose contacted Cindy Taylor, a customer service
15 representative at Sports South LLC (located at 101 Robert G Harris Drive in Shreveport,
16 Louisiana). SA Prose provided Taylor with the invoice number 10744048, which showed
17 an order that Rebecca Larson (the owner of Fred's Guns) had made on March 7, 2019.
18 The order showed Larson had purchased a Glock Pistol, model 48, chambered in 9mm
19 (serial number: BLGB685) for \$394.00. Larson purchased the pistol to display in her
20 store at Fred's Guns and to sell it.

21 48. Taylor confirmed that Larson had purchased the pistol and that the invoice
22 number 10744048 was correct. Taylor further told SA Prose that Sports South LLC had
23 shipped that pistol from Louisiana to Fred's Guns located in Washington State.

24 49. As discussed above, IOI Sandra Sherlock conducted an inventory of Fred's
25 Guns to determine which items had been stolen. IOI Sherlock confirmed that the Glock
26 Pistol, model 48, chambered in 9mm (serial number: BLGB685) was stolen from Fred's
27 Guns the night of April 13, 2019.

CONCLUSION

2 50. Based on the aforementioned facts, I believe that JOEY A. MAILLET
3 committed two counts of Theft of Firearm from a Federal Firearms Licensee, in violation
4 of Title 18, United States Code, Section 922(u).


Elliott Prose, Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

11 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
12 presence, the Court hereby finds that there is probable cause to believe the defendant
13 JOEY A. MAILLET committed the offenses set forth in the Complaint.

DATED this 23 day of July, 2019.

The Honorable John L. Weinberg
United States Magistrate Judge