

UNITED STATES DISTRICT COURT

for the

Western District of Michigan

United States of America )

v. )

Avis Damone Coward )

Case No. )

1:23-mj-518 )

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 10/24/2023 in the county of Ingham in the Western District of Michigan, 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:

See attached continuation

Continued on the attached sheet.

The Court processed the complaint remotely. The Court verified the Affiant's identity (by AUSA confirmation and through Affiant self-identification). Affiant attested to the affidavit and complaint via telephone, which the AUSA transmitted by remote electronic means (e-mail). The Court signed the original complaint and transmitted a correct copy of same to the Applicant, via the AUSA, by remote electronic means (e-mail). The process complied with Rules 3 and 4.1.

Complainant's signature

SA Joshua White, ATF Printed name and title

Date: 11/21/2023

Judge's signature

City and state: Grand Rapids, Michigan

Phillip J. Green, U.S. Magistrate Judge Printed name and title

**CONTINUATION IN SUPPORT OF APPLICATION FOR ARREST  
WARRANT**

I, Joshua White, being duly sworn, depose and state as follows:

**Introduction**

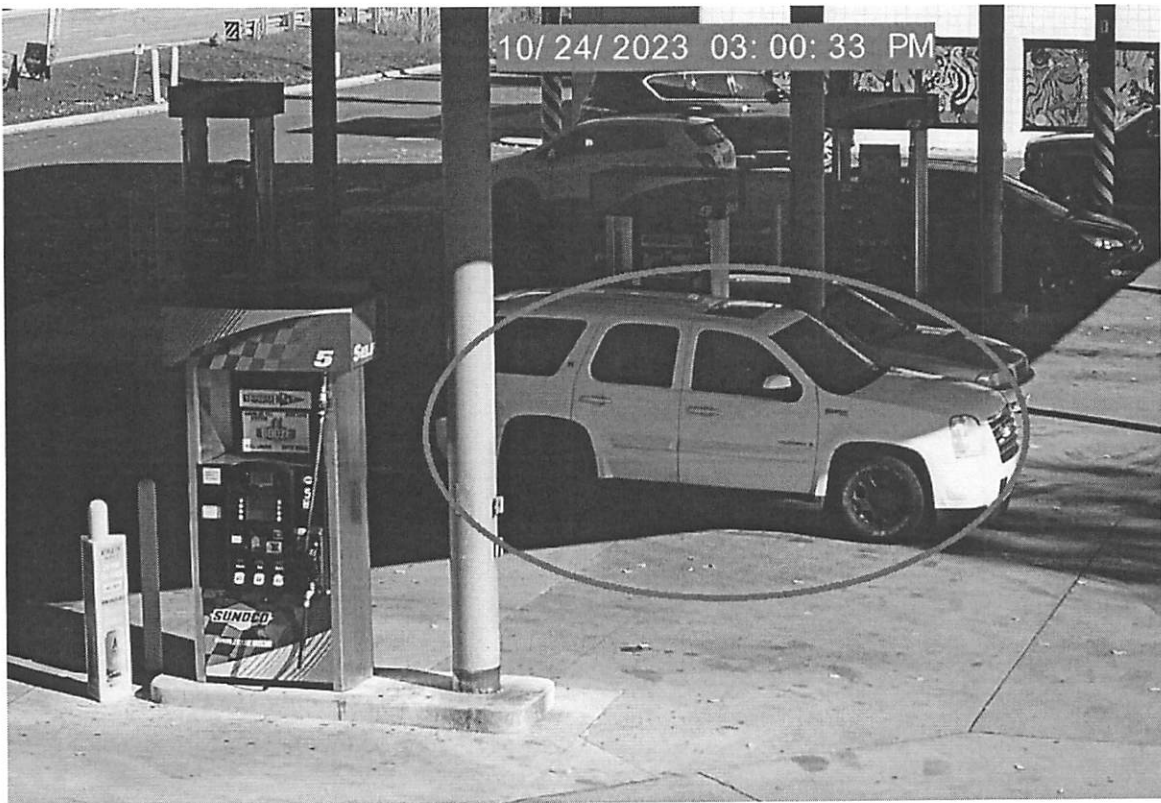
1. This continuation is submitted for the purpose of obtaining an arrest warrant for AVIS DAMONE COWARD for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

2. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and I have served as such since July 2022. Prior to serving as an ATF Special Agent, I was employed by the United States Secret Service as a Uniformed Division Officer for three and a half years. My daily responsibilities while serving were to screen passholders and appointments who had access to the White House Grounds, assist with protectee movements onto and off of the White House Complex, and enforce D.C. Code as well as Federal Law. I have completed the Federal Law Enforcement Training Center (FLETC) Uniformed Police Training program (UPTP) and the Criminal Investigator Training Program (CITP) with a total combination of over 800 hours of classroom and practical training. I have completed ATF's Special Agent Basic Training (SABT) academy with over 500 hours of classroom and practical training. I am presently assigned to ATF's Lansing Office conducting narcotics/firearms investigations.

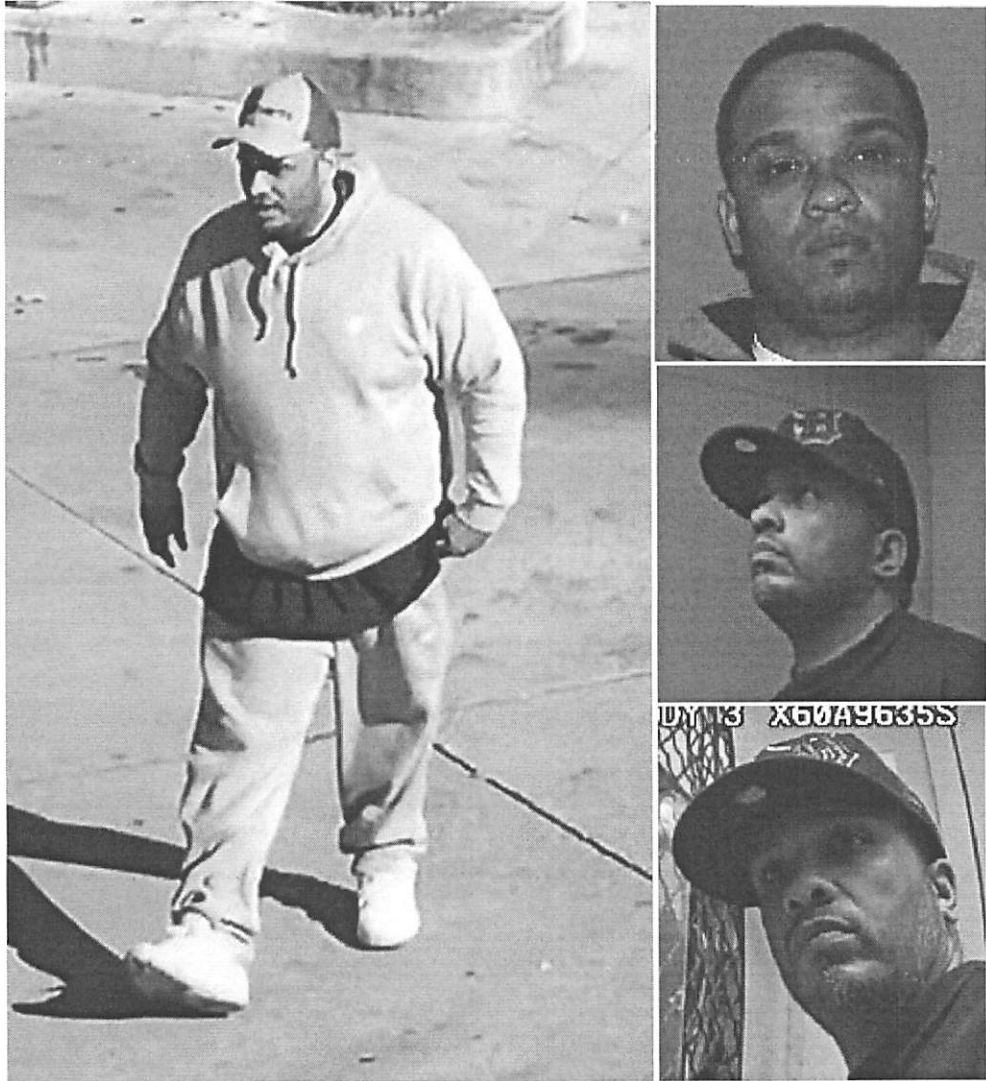
## Probable Cause

### *Fatal Shooting on October 24, 2023*

3. On October 24, 2023, at approximately 3:00 pm, a white GMC Yukon pulled into a gas station in Lansing and parked. This was recorded on surveillance video.



4. Two minutes later, AVIS DAMONE COWARD got out of the front passenger seat and approached the gas station. Below is a still frame of that (left), as well as COWARD's driver's license photo (top right) and two pictures of COWARD taken when he was arrested by police later that day (middle right and bottom right).



5. At 3:03 pm, a small bullet hole appeared in the front passenger window.



6. At 3:04 pm, a woman exited the front passenger seat holding a two-year-old child who had blood on his face. The woman was later identified as the child's mother. As the mother got out of the car, a gun fell on the ground.



7. The mother handed the child to COWARD, who then handed the child to another person nearby. That person took the child into the gas station and attempted to control the bleeding until medical personnel arrived.

8. At 3:04 pm, COWARD started to close the front passenger door, but then leaned down, picked up the gun, and put it back in the car.



9. COWARD also used his hand to break out the front passenger window, which had the bullet hole.



10. COWARD got into the driver's seat and drove the Yukon away.

11. It was determined that the child had a gunshot wound to his head. He died of his injury.

12. The mother spoke with police. She said that after her friend, "Avis," got out of the car, her child got into the front seat. She said that she was on the phone and not paying attention when she heard an "explosion" and saw that her child had shot himself in the head.

#### *COWARD's Arrest*

13. Police located and arrested COWARD later that day in Lansing. They did not find the Yukon at that time.

14. COWARD was wearing different clothes than at the gas station, but officers found glass shards on his pant leg.

15. After his arrest, COWARD made several calls from the jail.

16. During a call on October 25, 2023, at 10:28 am, COWARD called a man and a woman. The man offered to "put away" anything COWARD needed.

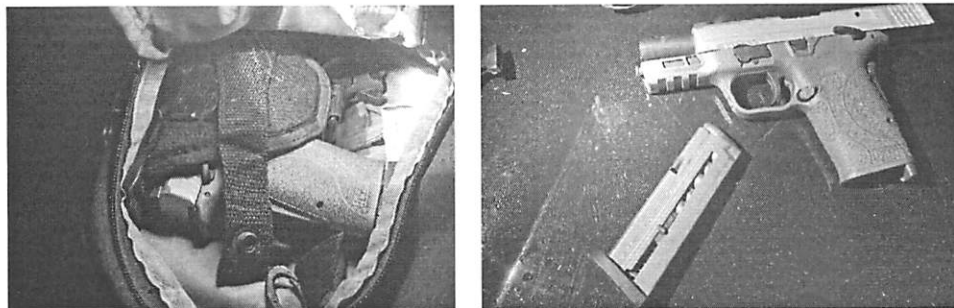


COWARD asked the man and woman to find his “phone” in “one of those rain troughs” near a fence. The woman told COWARD that she had his phone, and asked whether it was a Motorola. COWARD said it was. The woman, sounding confused, said that she had already collected “a Motorola and I got your actual phone.” COWARD said this was his “other phone.” The woman said she would retrieve it for him, and COWARD interrupted and instructed her to “do that right now, like right now, right now.”

17. COWARD called the man and woman back at 10:52 am. The man reported that he was “at the spot” looking “along the fence.” COWARD asked if there was “two phones or one,” and the man replied, “I found two phones.”

#### *Recovery of Evidence*

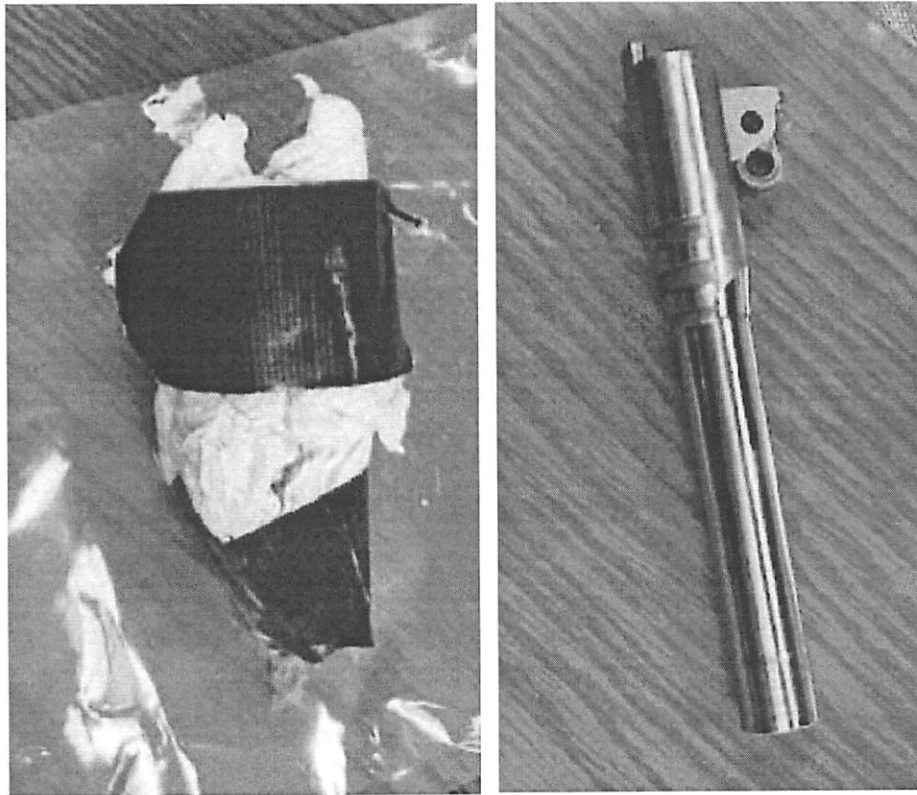
18. After listening to those phone calls, investigator identified the man that COWARD called. They located and arrested him in Lansing on October 31, 2023. Police found a purple Smith & Wesson pistol (shown below), as well as a BB gun and five grams of meth, in the man’s car.



19. The man told police that he found the Smith & Wesson and a Springfield Armory 1911 pistol in the locations by the fence line where COWARD had directed him on the phone. He said there were no phones in that location,

though there was one in a different location in the yard. The man said that he disassembled the Springfield Armory pistol, then hid the barrel in a certain house in Lansing and sold the remainder to another person.

20. Investigators identified the house the man referenced. They obtained a warrant to search it and found a pistol barrel, wrapped in paper towels and tape, hidden in wall insulation in the house, where the man said he had hidden it. Photographs of the wrapped and unwrapped barrel are included below.



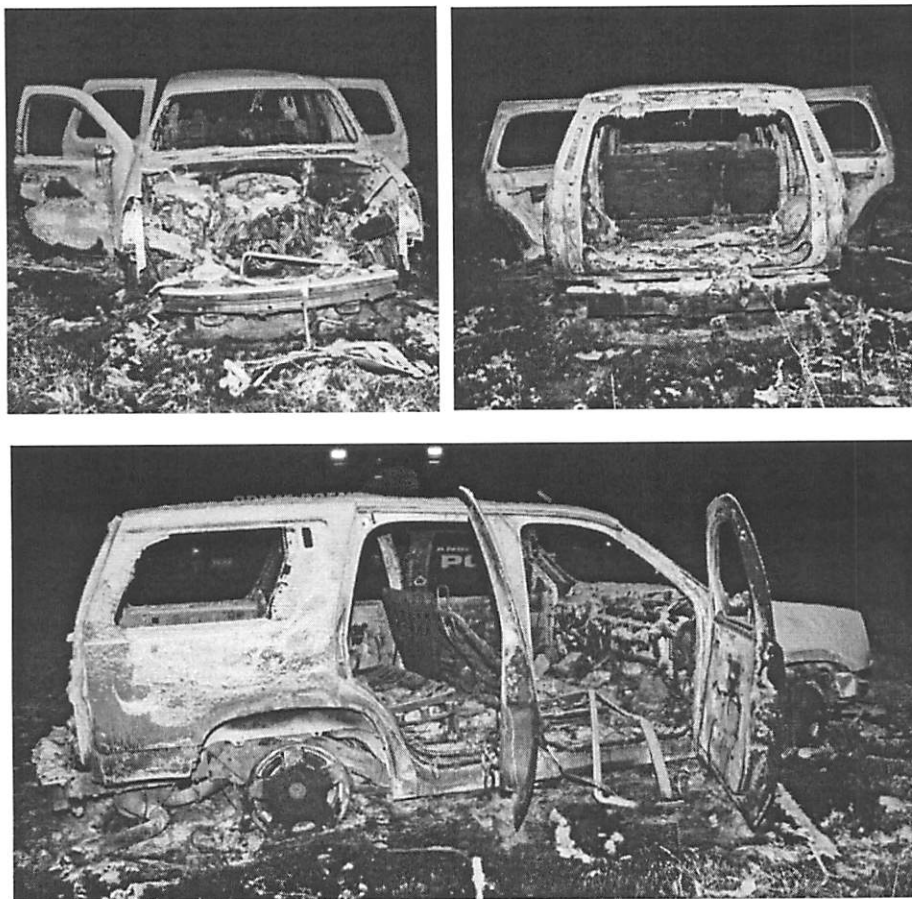
21. The barrel has an “SA” marking on it. ATF determined that the “SA” stands for “Springfield Armory,” which is a firearms manufacturer.

22. Based on my training and experience, as well as the facts and circumstances of this investigation, I believe that when COWARD told the man to find his “phone” “right now,” and then confirmed that there were two “phones,” he



was actually referring to the Smith & Wesson and Springfield Armory pistols described above. Moreover, because the gun that fell out of the passenger side of the Yukon was not purple, and because the Springfield Armory pistol had been disassembled, I believe the Springfield Armory pistol was the one that shot the child, and that it was disassembled and separated to prevent ballistic comparison and analysis.

23. On October 31, 2023, investigators found the Yukon in which the child shot himself on October 24, 2023. It was in a field in Lansing, heavily damaged by fire.



*Additional Information*

24. ATF determined that the purple Smith & Wesson pistol was manufactured outside the State of Michigan.

25. ATF determined that the recovered barrel, pictured above, was a Springfield Armory 1911 barrel, and that Springfield Armory pistols are manufactured outside the State of Michigan.

26. AVIS COWARD was prohibited from possessing a firearm because he had been convicted of the following felony offenses:

- a. Breaking and Entering, in 1998
- b. Carrying a Concealed Weapon, in 1998
- c. Delivery or Manufacture of a Controlled Substance, in 1999
- d. Carjacking, in 2003
- e. Brandishing a Firearm during the Commission of a Violent Felony, in 2003
- f. Fleeing from a Police Officer, in 2021.

**Conclusion**

27. Based on the facts described above, I believe there is probable cause that AVIS DAMONE COWARD violated Title 18, United States Code, Section 922(g)(1), felon in possession of a firearm.