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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

LEONARD D. JOHNSON,  
also known as "Scrap"

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

AUSA Charles W. Mulaney (312) 371-5903

CASE NUMBER: 20-cr-00865

**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 December 7, 2020, at Robbins, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

*Offense Description*

Title 18, United States Code, Section 922(o)(1)

did knowingly possess a machinegun as defined in Title 26, United States Code, Section 5845(b)

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



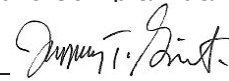
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Date: 2020.12.08 13:50:39 -06'00'

EUPHEMIA S. LEE

Special Agent, Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 8, 2020



*Judge's signature*

City and state: Chicago, Illinois

JEFFREY T. GILBERT, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, EUPHEMIA S. LEE, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), and have been so employed for three years. My current responsibilities include the investigation of firearms offenses.

2. This affidavit is submitted in support of a criminal complaint alleging that LEONARD D. JOHNSON, also known as “Scrap,” has violated Title 18, United States Code, Section 922(o)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JOHNSON with possession of a machinegun, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, my review of pertinent documents and recordings, my participation in the search warrant executed at JOHNSON’s residence, and my participation in the ATF’s interview of JOHNSON.

**I. APPLICABLE LAW**

4. Title 26, United States Code, Section 5845(a), defines “machinegun” as “any weapon which shoots . . . more than one shot . . . by a single function of the

trigger.” The definition further includes “any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun.”

5. Title 18, United States Code, Section 922(o) makes it “unlawful for any person to transfer or possess a machinegun,” and Section 921(a)(23) states that “[t]he term ‘machinegun’ has the meaning given such term in section 5845(b) of the National Firearms Act (26 U.S.C. § 5845(b)).”

4. Based upon my training and experience and the training and experience of other agents with whom I have consulted, I am aware of conversion devices that have been designed and created for the sole purpose of converting semiautomatic Glock pistols into fully automatic machineguns. These devices vary by design and appearance, but all, when properly installed on a semiautomatic Glock pistol, will allow the firearm to expel more than one projectile by a single pull of the trigger. Installation of these Glock Conversion Devices usually requires no technical expertise and is completed by removing the polymer slide cover plate on a Glock semiautomatic pistol and replacing it with a Glock Conversion Device. I also know that these devices are referred to by different names, including but not limited to, “Glock switches,” “auto sears,” “convertors,” “conversion switches,” “selector switches,” “conversion devices,” “Fire Selector Systems for Glock,” “auto switches,” or simply “switches.” The Glock Conversion Device is a prohibited item under the National Firearms Act, 26 U.S.C. § 5845(b), because it is “any part designed and intended solely and exclusively,

or combination of parts designed and intended, for use in converting a weapon into a machinegun.”

## **II. FACTS SUPPORTING PROBABLE CAUSE**

7. On December 7, 2020, the Honorable Heather K. McShain signed a search warrant authorizing the search of an apartment in Robbins, Illinois, where JOHNSON resided at the time, and agents executed the search warrant that same day. During that search, the ATF recovered approximately five firearms, over a hundred Glock Conversion Devices, and various types of narcotics. In a recorded interview, JOHNSON stated that the Glock Conversion Devices were his and he knew that they converted firearms to fully automatic firing.

8. When agents entered the apartment, at approximately 3:00 p.m., JOHNSON and two other individuals were inside the apartment. The apartment had two levels and a basement, with three bedrooms on the second floor. When first encountered by agents, JOHNSON was in one of the second-floor bedrooms lying on the bed.

9. When an ATF agent asked JOHNSON if there was anything in the apartment that could hurt him, JOHNSON stated that there were “three of four guns” along with “crack” and “dope” in his bedroom.

10. ATF agents recovered the following firearms in JOHNSON’s bedroom: a Draco 7.62 x 39 millimeter pistol, a Glock 20 Gen4 10mm pistol with an installed Glock Conversion Device, a Glock 21 .45 caliber pistol with an installed Glock

Conversion Device, and what appeared to be a homemade PFP400 Polymer 80 Glock-style pistol with an installed Glock Conversion Device.<sup>1</sup>

11. Agents recovered a Ruger EC9S 9mm pistol from the basement of the apartment. Agents also recovered ammunition and various firearm accessories from JOHNSON's bedroom and from other locations in the apartment.

12. In addition, ATF agents recovered from JOHNSON's bedroom ten plastic bags containing Glock Conversion Devices. Each bag contained multiple devices. I have examined some of those devices. They appear consistent with Glock Conversion Devices recently seized by ATF. One of the previously seized devices was tested by the ATF's Firearms Technology Criminal Branch in a field function ability test, which determined that the device, when installed, caused a Glock pistol to fire automatically with a single pull of the trigger. In addition, as set forth above, three of the four firearms recovered from JOHNSON's bedroom had Glock Conversion Devices installed.

13. While the search was being conducted, ATF agents recorded an interview with JOHNSON. I participated in that interview and have reviewed the recording. ATF agents read JOHNSON his *Miranda* rights, he acknowledged that he understood them, and he signed a written acknowledgement and consent to speak

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<sup>1</sup> This pistol did not have a serial number. Based on my training and experience, I know that several companies, including Polymer80, Inc. market and sell kits and parts that can be used to assemble functional firearms with additional parts, machining, or a combination of the two. Such kits are marketed as 80% kits, and parts included in such kits typically do not bear serial numbers.

with the agents. When asked about the Glock Conversion Devices, JOHNSON had the following exchange:<sup>2</sup>

JOHNSON: I'm not stupid. Yes, I've got some attachments up there. It's what this's called – attachments.

ATF Special Agent: Attachments. Glock switches.

JOHNSON: Attachments, yeah.

ATF Special Agent: Then you know what those do to the Glock?

JOHNSON: Yes, make it fully.

ATF Special Agent: Fully auto? Turns it into a machine gun basically.

JOHNSON: Yes, fully automatic.

14. JOHNSON further stated that he had run a “business” selling Glock Conversion Devices since approximately June 2020. JOHNSON explained that for repeat customers, he would typically sell the Glock Conversion Devices for about \$500 each. When asked how many Glock Conversion Devices were in the apartment, JOHNSON said “I probably got about like, eighty” and then clarified, “that’s what I would probably assume. Fifty to eighty.” The ATF agents recovered approximately 117 Glock Conversion Devices from the apartment.<sup>3</sup>

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<sup>2</sup> This is a draft transcript based on my preliminary review of the recording, not a final transcript.

<sup>3</sup> Based on my training, experience, the experience of other agents, and my examination of the seized Glock Conversion Devices, I believe that they were manufactured after May 19, 1986, which is the effective date referenced in Title 18, United States Code, 922(o)(2)(B). In addition, I do not know of any government agency in the United States that authorizes the use of Glock Conversion Devices as contemplated by the exemption set forth in Title 18, United States Code, Section 922(o)(2)(A).

15. In addition to the firearms and Glock Conversion Devices, agents recovered over \$8,000 in cash and baggies with suspected heroin and crack cocaine in JOHNSON's bedroom from the apartment. JOHNSON estimated that he had "about \$5,000" in the apartment and stated that the narcotics were for personal use.

### III. JOHNSON'S SNAPCHAT

16. On or about December 4, 2020, I reviewed postings made by an account with the Snapchat username "scrap4107," which had the display name of "Savage Crazy." One of the photographs posted by Savage Crazy showed a picture of a man who appeared to be JOHNSON, based on a comparison to his driver's license and Chicago Police Department booking photograph, and my in-person viewing:

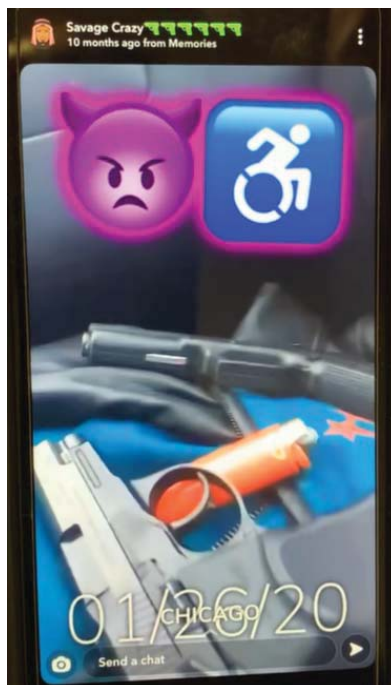


17. As shown above, the post states that it was "2 weeks ago from Memories." In the picture, JOHNSON appears to be holding a large amount of cash.

18. I also viewed a video posted by the account labeled “10 months ago from Memories” which appears to show JOHNSON inside a car. A screenshot is below:



19. The video appears to pan quickly down to the car seat next to JOHNSON, showing two pistols:





### III. CONCLUSION

20. As set forth above, there is probable cause to believe that LEONARD D. JOHNSON violated Title 18, United States Code, Section 922(o), in that JOHNSON knowingly possessed a “machinegun” as defined in Title 26, United States Code, Section 5845(b) on or about December 7, 2020.

FURTHER AFFIANT SAYETH NOT.



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EUPHEMIA S. LEE  
Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives

SWORN TO AND AFFIRMED by telephone December 8, 2020.



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Honorable JEFFREY T. GILBERT  
United States Magistrate Judge