

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DEVON DOW

CASE NUMBER: 22CR278

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between in or around January 2022 and in or around May 2022, at Chicago, Illinois, in the Northern District of Illinois, Eastern Division, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 922(a)(1)(A)	willfully engaged in the business of manufacturing and dealing in firearms without a license

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

*Christopher B. Perugini / by HKM*

\_\_\_\_\_  
CHRISTOPHER B. PERUGINI  
Special Agent, Homeland Security Investigations  
(HSI)

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: May 24, 2022

*Heather K. McShain*

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

HEATHER K. MCSHAIN, U.S. Magistrate Judge  
*Printed name and title*



by T-Mobile, and believed to be used by DEVON DOW, as described further in Attachment A-2 (“**Subject Phone 1**”), for evidence, instrumentalities, and fruits described further in Attachment B-2, concerning the Subject Offense.

3. The statements in this affidavit are based on multiple sources, including but not limited to: my personal knowledge; my review of reports and documents related to this investigation; my review of video recordings related to this investigation; conversations with others who have knowledge of the events and circumstances described in this affidavit; my review of law enforcement databases; my own training and experience and the training and experience of other agents with whom I work; information provided to me by local law enforcement officers, and from persons with knowledge regarding relevant facts.

4. Because this affidavit is being submitted for the limited purpose of supporting a criminal complaint and securing search warrants, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe establish probable cause to believe that DEVON DOW has committed and is committing the Subject Offense. I have further set forth facts that I believe establish probable cause to believe that evidence, instrumentalities, and fruits of the Subject Offense are located at the **Subject Premises** and in **Subject Phone 1**.

#### **PROBABLE CAUSE**

5. In January 2022, Homeland Security Investigations (HSI) Chicago’s Gang Unit and the Chicago Police Department (CPD) initiated a criminal investigation targeting a suspected manufacturer and seller of undetectable or

untraceable firearms that are assembled from gun kits without a serial number, commonly referred to as “ghost guns,” on the south side of Chicago. During the investigation, HSI has, using an undercover officer, purchased at least five functioning ghost guns from DEVON DOW.

6. More specifically, and as set forth in more detail below, on at least five occasions between approximately January 14, 2022, and approximately May 3, 2022, DEVON DOW has exited the **Subject Premises** with concealed firearms and exchanged those firearms for money from an undercover officer. Following each meeting, law enforcement has observed DEVON DOW reenter the **Subject Premises** using a door marked “1346-2”. In addition, and explained in more detail below, DEVON DOW has used **Subject Phone 1** to coordinate the sale of ghost guns.

7. Based on my training and experience, as well as the training and experience of other law-enforcement members with whom I have consulted, ghost guns are firearms, as defined in Title 18, United States Code, Section 921(a)(3), in that they will and/or are designed to dispel projectiles by explosion. Such weapons are generally manufactured by unlicensed individuals using a variety of prefabricated or partially unfinished firearm parts assembled from various sources, rather than manufactured by an actual or licensed gun manufacturer. Ghost guns do not generally have serial numbers.

## I. FACTS SUPPORTING PROBABLE CAUSE THAT DEVON DOW HAS COMMITTED THE SUBJECT OFFENSE

8. On or about January 3, 2022, a confidential source (CS-1)<sup>1</sup> advised law enforcement that an unidentified male (UM-1) was involved in the illegal sales of firearms near the area of 75<sup>th</sup> Street and Halsted Street in Chicago. CS-1 further stated that UM-1 ordered the firearm parts from the internet and assembled the firearms prior to sale. Additionally, on or about January 14, 2022, CS-1 informed law enforcement that UM-1 sold “ghost guns.”

### A. On or about January 14, 2022, DEVON DOW Exited the Subject Premises and Delivered a Firearm to an Undercover Law Enforcement Officer in Exchange for Money.

9. On or about January 14, 2022, CS-1 arranged a meeting between an undercover law-enforcement officer (UC-1) and DEVON DOW to purchase a ghost gun.<sup>2</sup> On the same date, at approximately 4:46 p.m., UC-1 entered the parking lot

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<sup>1</sup> CS-1 has been a documented informant with the Chicago Police Department since approximately 2015. CS-1 is a convicted felon pertaining to drug related offenses with approximately 15 arrests and 3 convictions. CS-1 has been paid approximately \$500.00 for his/her information related to this investigation. With respect to this investigation, law enforcement officers (“LEOs”) believe CS-1 to be credible because the information he/she has provided has been corroborated from outside sources, including surveillance and the investigation of UM-1, later identified as DEVON DOW.

<sup>2</sup> As explained further below, law enforcement later identified UM-1 as DEVON DOW. Shortly after the transaction described in this section, law enforcement misidentified UM-1 to be Individual A. Specifically, during this transaction, on or about January 14, 2022, UM-1 was wearing white shoes. On January 15, 2022, law enforcement conducted an ID stop on an individual who exited the front of the **Subject Premises** wearing similar white shoes from the transaction on or about January 14, 2022. This individual was identified as Individual A. Based on open-source research, Individual A is listed as residing at the **Subject Premises**. However, individual A presented an ID during this stop that listed 1348 East 75<sup>th</sup> Street. As explained in more detail below, law enforcement later identified UM-1 to be DEVON DOW through surveillance, investigative methods, records checks, photo array, and an ID stop.

next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**).<sup>3</sup> Using a City of Chicago Police Observation Device (“POD”) camera, which is a surveillance camera mounted on a pole, at approximately 5:00 p.m., law enforcement observed DEVON DOW exit the front of the **Subject Premises**. UC-1 met with DEVON DOW in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**). During the meeting, UC-1 purchased one (1) polymer 80, two-tone 9-millimeter semiautomatic firearm, bearing no serial number, in exchange for \$900.00 from DEVON DOW.

10. Shortly after the exchange, DEVON DOW provided UC-1 with his phone number (312) 597-9627 (**Subject Phone 1**).<sup>4</sup> UC-1 then departed the area. At approximately 5:02 p.m., DEVON DOW departed the parking lot on foot and law enforcement observed him via POD camera enter the front of the **Subject Premises**.

11. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe DEVON DOW exited the **Subject Premises** with one polymer 80, two tone 9-milimeter semiautomatic firearm and then delivered the firearm to UC-1 in exchange for money. DEVON DOW then returned to the **Subject Premises** with the proceeds from the firearm transaction.

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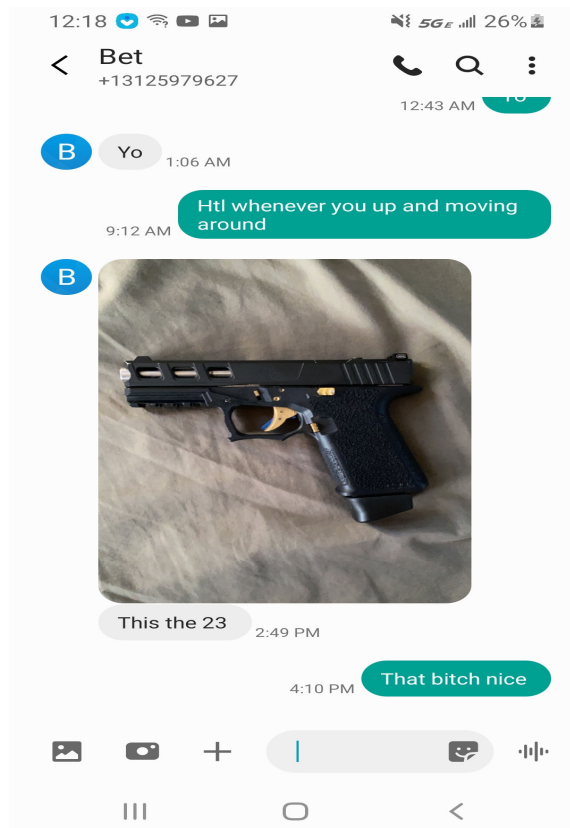
Law enforcement currently does not know the specific relationship, between DEVON DOW and Individual A.

<sup>3</sup> CS-1 was present during this transaction.

<sup>4</sup> On February 8, 2022, Chief Judge Rebecca R. Pallmeyer authorized the installation and use, for a period of 60 days of a pen register and trap and trace device on telephone number (312) 597-9627 (**Subject Phone 1**), used by DEVON DOW.

**B. On or about January 26, 2022, DEVON DOW Exited the Subject Premises and Delivered a Firearm to an Undercover Law Enforcement Officer in Exchange for Money.**

12. On or about January 25, 2022, between approximately 12:43 a.m., and 4:10 p.m., UC-1 engaged in a series of text messages with **Subject Phone 1**, used by DEVON DOW in order to arrange a purchase of a polymer-80 ghost gun. Those messages included the following exchange: UC-1 messaged, “Htl [hit the line] whenever you up and moving around.” **Subject Phone 1** responded with a photograph of a firearm with the caption, “This the 23 [Glock 23].” An image of the text message exchange is below.



13. On or about January 26, 2022, at approximately 12:50 p.m., UC-1 placed a consensually recorded call to **Subject Phone 1**, which was answered by DEVON

DOW. During the call, DEVON DOW and UC-1 agreed that DEVON DOW would sell UC-1 a firearm, specifically, a Glock 23 style polymer 80 model for \$900.<sup>5</sup> DEVON DOW stated on the phone call that “I [DEVON DOW] tell all my customers... you gotta make sure you call... I ain’t had nobody call me back but just in case like you know what I’m saying have any problems [with the firearm] like call me ASAP [and he will fix the firearm].” Further, DEVON DOW stated, in summary and not verbatim, to UC-1 that the firearms he sells are functional firearms. UC-1 asked DEVON DOW about the possibility of customizing gun parts in future orders, to which DEVON DOW replied with which parts of the guns he can customize. UC-1 and DEVON DOW arranged a meeting for later in the day, near 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**) for the sale of the aforementioned firearm.

14. On the same date, at approximately 1:56 p.m., UC-1 and UC-2, equipped with an audio and video recording device, arrived in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**) to complete the transaction for the firearm. Using a POD camera, at approximately 1:59 p.m., law enforcement observed DEVON DOW exit the front of the **Subject Premises**. DEVON DOW approached UC-1 and UC-2, removed one Glock 23 style polymer 80

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<sup>5</sup> As noted below, UC-1 confirmed that the voice of **Subject Phone 1**’s user matched the voice of the person from whom he purchased the ghost gun on or about January 14, 2022, and who provided the number for **Subject Phone 1**.



.40 caliber firearm, bearing no serial number,<sup>6</sup> from his front jacket pocket, and placed the firearm in the trunk of UC-1 and UC-2's vehicle in exchange for \$900. During the exchange, DEVON DOW, using a cell phone,<sup>7</sup> showed UC-1 and UC-2 the websites that DEVON DOW orders parts from, specifically referencing eBay. Shortly after the exchange, UC-1 and UC-2 departed the area. Using a POD camera, at approximately 2:01 p.m., law enforcement observed DEVON DOW depart the area on foot and enter the front of the **Subject Premises**. An image of DEVON DOW captured on the UC recording from the transaction is below. Also below is an image of DEVON DOW's State of Illinois identification photograph. Additionally, based on the appearance of the collar on the jacket, law enforcement believes DEVON DOW is wearing the same jacket during the transaction as in his State of Illinois identification photograph.

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<sup>6</sup> This gun is believed, based on appearance, to be the same firearm from the text message image that DEVON DOW sent to UC-1 on or about January 25, 2022.

<sup>7</sup> UC-1 could not positively identify this phone as **Subject Phone 1**.



15. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe DEVON DOW exited the **Subject Premises** with one (1) Glock 23 style polymer 80 .40 caliber firearm and then delivered the firearm to UC-1 and UC-2 in exchange for money. DEVON DOW then returned to the **Subject Premises** with the proceeds from the firearm transaction.

**C. The Identification of DEVON DOW as the Firearms Manufacturer / Distributor.**

16. Following the in-person meeting between UC-1, UC-2, and DEVON DOW on or about January 26, 2022, agents compared DEVON DOW's face from the UC recording and POD camera footage to that of DEVON DOW's photograph maintained by the Illinois Secretary of State and identified DEVON DOW as the

person with whom UC-1 met on or about January 14, 2022, and whom UC-1 and UC-2 met on or about January 26, 2022.

17. On or about January 31, 2022, Chicago police officers stopped DEVON DOW<sup>8</sup> after leaving the front of the **Subject Premises**. At officers' request, DEVON DOW provided his State of Illinois identification to officers.<sup>9</sup> During this ID stop, DEVON DOW stated to officers' that his address is 1346 East 75<sup>th</sup> Street, #2, Chicago, Illinois (the **Subject Premises**).

18. According to the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), federal law requires that a firearms dealer engaged in the business of dealing in firearms be licensed by ATF. On or about February 2, 2022, law enforcement submitted a records check request to ATF inquiring whether DEVON DOW possessed a valid Federal Firearms License (FFL) to sell firearms. On or about February 3, 2022, ATF Federal Firearms Licensing Center confirmed that DEVON DOW does not possess a valid FFL. Additionally, according to ATF and law enforcement databases, DEVON DOW does not possess a valid Firearms Owners Identification (FOID) card or Concealed Carry License (CCL).

19. On or about February 3, 2022, law enforcement conducted a photo array of six (6) individuals with UC-1. The photo array contained a photograph of DEVON

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<sup>8</sup> DEVON DOW was wearing similar clothes as he wore during the transaction on or about January 26, 2022.

<sup>9</sup> The address on DEVON DOW's State of Illinois identification is not the **Subject Premises**. Based on open-source research and the address on DEVON DOW's state of Illinois identification, LEOs believe DEVON DOW has ties, to and may reside in part or full, at 5318 South Princeton Avenue, 2<sup>nd</sup> Floor, Chicago, Illinois.

DOW. On or about February 7, 2022, law enforcement conducted a photo array of six (6) individuals with UC-2. The photo array contained a photograph of DEVON DOW. UC-1 and UC-2 both identified DEVON DOW as the individual who sold them the Glock 23 style polymer 80 .40 caliber firearm on or about January 26, 2022.

**D. Test Firing of Firearm Purchased from DEVON DOW on or about January 26, 2022.**

20. On or about February 19, 2022, a certified forensic examiner from the Chicago Police Department (CPD) Crime Laboratory Division conducted an examination of the Glock 23 style polymer 80 .40 caliber firearm sold by DEVON DOW on or about January 26, 2022. The firearm successfully fired two (2) rounds of ammunition and was classified as “will fire”, thus classifying it as a working firearm.<sup>10</sup>

**E. On or about March 4, 2022, DEVON DOW Exited the Subject Premises and Delivered a Firearm to an Undercover Law Enforcement Officer in Exchange for Money.**

21. On or about March 3, 2022, between approximately 3:00 p.m., and 4:21p.m., UC-1 engaged in a series of text messages with **Subject Phone 1** to set up a transaction to purchase a polymer 80 ghost gun. Those messages included the following exchange: **Subject Phone 1** messaged, “Yo.” UC-1 replied, “Yo what’s the word?” **Subject Phone 1** replied, “Got another 23 [Glock 23] for sale.” UC-1 messaged, “Is it like the one from before?” (referencing the firearm purchased from

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<sup>10</sup> The firearm purchased on or about January 14, 2022, was not tested by a certified forensic examiner but, according to CPD officers, was fired.

DEVON DOW on or about January 26, 2022). **Subject Phone 1** responded with a photograph of a firearm with what appeared to be an extended magazine attached. Later in the conversation, **Subject Phone 1** messaged, “It ran me like 830 I let go for 950.” An image of the text message exchange is below.



22. On or about March 4, 2022, at approximately 5:23 p.m., UC-1 placed a recorded outgoing call to **Subject Phone 1**. During the call, UC-1 asked DEVON DOW if he was at his residence. (LEOs believe this was a reference to the **Subject**

**Premises.**) DEVON DOW responded to UC-1 that he was at the home (which LEOs believe was a reference to **Subject Premises**).

23. On the same date, at approximately 6:04 p.m., UC-1 and UC-2, equipped with an audio and video recording device, arrived in front of 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**). Using a POD camera, law enforcement observed DEVON DOW exit the front of the **Subject Premises**. According to UC-1, UC-2, and the audio and video recording device, DEVON DOW instructed UC-1 and UC-2 to “pull around to the lot cause twelve [police] be hot as hell [are out looking around for crime].” UC-1 and UC-2 parked their vehicle in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**), exited their vehicle, and met DEVON DOW at the rear of their vehicle. UC-1 opened the trunk of the vehicle, and DEVON DOW reached into his pocket and placed one (1) polymer 80 black Glock 23 style .40 caliber firearm, bearing no serial number,<sup>11</sup> with an approximately 22-round magazine in the trunk of the vehicle in exchange for \$1,000.00. UC-1 then closed the trunk of the vehicle. During this encounter, and as captured on the audio/video recording, UC-1 asked DEVON DOW how long it would take to manufacture three firearms, to which DEVON DOW replied about four or five days. UC-1 and UC-2 entered the vehicle and departed the area. Law enforcement on surveillance observed DEVON DOW depart the parking lot on

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<sup>11</sup> It is believed, based on appearance, to be the same firearm from the text message image that DEVON DOW sent to UC-1 on or about March 3, 2022.

foot and enter the front of the **Subject Premises**. An image of DEVON DOW captured on the UC recording from the transaction is below.

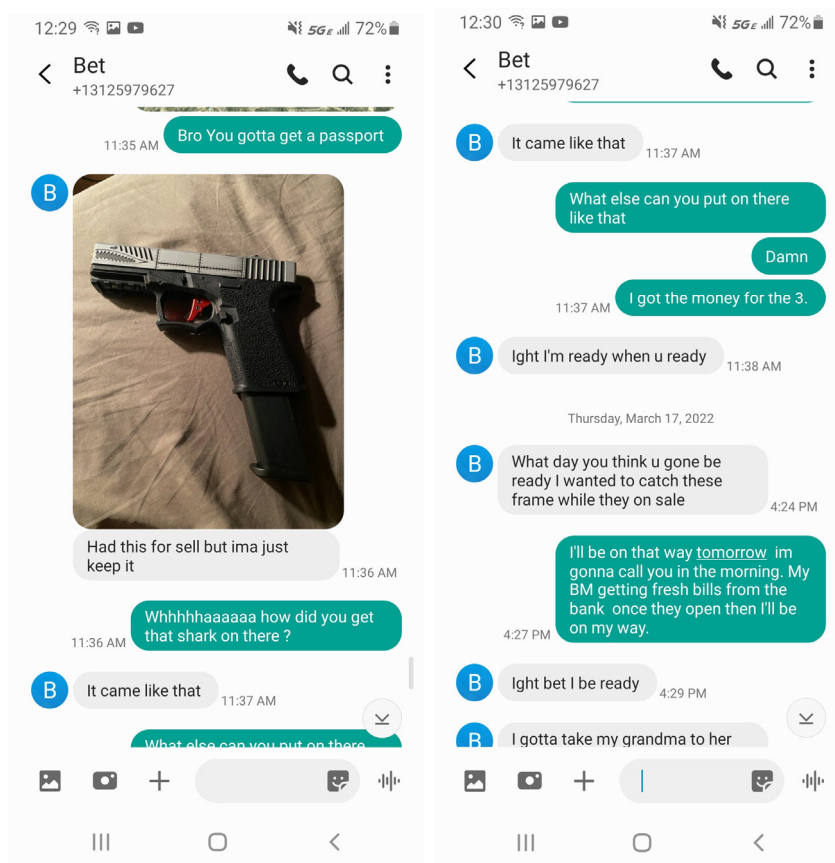


24. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe DEVON DOW exited the **Subject Premises** with one (1) Glock 23 style polymer 80 .40 caliber firearm and then delivered the firearm to UC-1 and UC-2 in exchange for money. DEVON DOW then returned to the **Subject Premises** with the proceeds from the firearm transaction.

**F. On or about March 27, 2022, DEVON DOW Exited the Subject Premises and Delivered Three (3) Firearms to an Undercover Law Enforcement Officer in Exchange for Money Previously Tendered.**

25. On or about March 15, 2022, UC-1 engaged in a series of text messages with **Subject Phone 1** to set up another transaction to purchase the three firearms discussed during the transaction on or about March 4, 2022. Those messages included the following exchange: **Subject Phone 1** messaged a photo of a firearm with the caption, "Had this for sell but ima just keep it." Later in the conversation, UC-1

messaging, “I got the money for the 3 [firearms].” **Subject Phone 1** responded, “Ight I’m ready when u ready.” Approximately two days later, on or about March 17, 2022, DEVON DOW messaged UC-1 to confirm a time when UC-1 would be ready with the money [for the three firearms] because DEVON DOW “wanted to catch these frame [firearm part] while they on sale.” Images of the text message exchange are below.



26. On or about March 18, 2022, at approximately 1:39 p.m., UC-1 and UC-2, equipped with an audio and video recording device, arrived in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**). UC-1 placed a recorded call to DEVON DOW, who was using **Subject Phone 1**, and told DEVON DOW that he/she was outside. Moments later, DEVON DOW exited the front



of the **Subject Premises** and approached UC-1 and UC-2. DEVON DOW entered the vehicle of UC-1 and UC-2. UC-1 handed DEVON DOW \$3,000.00 in order to purchase three firearms. DEVON DOW counted the money and placed it in his front jacket pocket. During the encounter, DEVON DOW removed a concealed firearm from his person to show to UC-1 and UC-2.<sup>12</sup> Further, DEVON DOW stated he was not done modifying this firearm and was going to change parts out to further customize it. An image of the firearm captured on the UC recording is below.



27. According to the audio/video recording, during this encounter, UC-1 explained to DEVON DOW that UC-1 wanted three Glock 19 style polymer 80 firearms for the \$3,000.00 tendered. DEVON DOW explained to UC-1 that DEVON DOW is going to load the money onto prepaid cards in order to purchase the parts and can only load a certain amount of money per day on the cards. Lastly, UC-1

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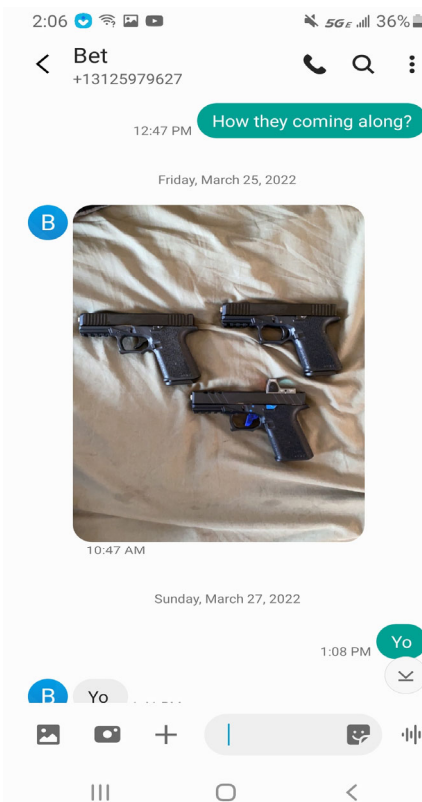
<sup>12</sup> This firearm is believed to be the same from the text message image that DEVON DOW sent to UC-1 on or about March 15, 2022.

instructed DEVON DOW, “when you... when you bring it [the three firearms] out, make sure you throw it in like... you got a shoebox or something in there [the **Subject Premises**]? You want me to bring you a bag?” DEVON DOW replied, “I got a shoebox.” UC-1 replied, “Ok yeah, put it [the three firearms] in a shoebox, cause I gotta throw that shit [the three firearms] right in the trunk. I can’t... I get caught with three [firearms] of the motherfuckers, it’s over with.” Law enforcement observed DEVON DOW depart the parking lot on foot and enter the front of the **Subject Premises**. UC-1 and UC-2 departed the area. An image of DEVON DOW captured on the UC recording from the transaction is below.



28. On or about March 24, 2022, at approximately 12:47 p.m., UC-1 sent a text message to **Subject Phone 1** inquiring about the three firearms. UC-1 messaged, “How they [the firearms] coming along?” DEVON DOW called UC-1 and in an unrecorded call stated in summary that the three firearms would be ready on that same day (on or about March 24, 2022) and that he was just waiting on one more firearm part to be delivered in the mail to complete the assembly.

29. On or about March 25, 2022, at approximately 10:47 a.m., DEVON DOW, using **Subject Phone 1**, messaged UC-1 a photograph of three firearms. At approximately 1:18 p.m., UC-1 placed a recorded outgoing call to DEVON DOW, who was using **Subject Phone 1**. DEVON DOW answered and during the conversation, UC-1 and DEVON DOW arranged a time to complete the firearms transaction. An image of part of the text message exchange is below.



30. On or about March 27, 2022, at approximately 1:41 p.m., UC-1 placed an outgoing call to **Subject Phone 1**, this call was recorded. UC-1 asked if DEVON DOW was at his residence. DEVON DOW responded to UC-1 that he was at home, and UC-1 stated he/she is on the way to the **Subject Premises**.

31. On the same date, at approximately 2:32 p.m., UC-1 and UC-2, equipped with an audio and video recording device, arrived in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**). UC-1 placed a recorded outgoing call to DEVON DOW, who was using **Subject Phone 1**, and stated he/she was outside the **Subject Premises**, in the parking lot. Moments later, law enforcement observed DEVON DOW exit the front of the **Subject Premises**, carrying a white shopping bag. DEVON DOW approached UC-1 and UC-2 and handed UC-1 the white shopping bag. UC-1 then placed the white shopping bag into the trunk of his/her vehicle. UC-1 and UC-2 then reentered their vehicle and departed the area. Law enforcement observed DEVON DOW depart the parking lot on foot and enter the front of the **Subject Premises**. Upon conclusion of the transaction, the white shopping bag was found to contain a shoebox that contained three polymer 80, Glock 19 style, 9-millimeter semi-automatic firearms, each bearing no serial number.<sup>13</sup> An image of DEVON DOW captured on the UC recording from the transaction is below.

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<sup>13</sup> It is believed, based on appearance, to be the same firearms from the text message image that DEVON DOW sent to UC-1 on or about March 25, 2022.



32. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe DEVON DOW exited the **Subject Premises** with three polymer 80, Glock 19 style, 9-millimeter semi-automatic firearms and then delivered the firearms to UC-1 and UC-2 in exchange for the money provided previously. Further, I believe DEVON DOW concealed the firearms in a white shopping bag that contained a shoebox (which was discussed during the money drop off on or about March 18, 2022). Lastly, I believe DEVON DOW orders the firearm parts to the **Subject Premises**, and also manufactures the firearms at the **Subject Premises**.

**G. Test Firing of Firearms Recovered from DEVON DOW on or about March 4, 2022, and on or about March 27, 2022.**

33. On or about April 5, 2022, a certified forensic examiner from the CPD Crime Laboratory Division conducted an examination of the four polymer 80 firearms

sold by DEVON DOW on or about March 4, 2022, and on or about March 18, 2022 to March 27, 2022. Each of the four firearms successfully fired two rounds of ammunition and were classified as “will fire”, thus classifying each as a working firearm.

**H. On or about May 3, 2022, DEVON DOW Exited the Subject Premises and Delivered One (1) Firearm to an Undercover Law Enforcement Officer in Exchange for Money.**

34. On or about April 4, 2022, UC-1 engaged in a series of text messages with **Subject Phone 1** to set up a transaction to purchase one firearm. **Subject Phone 1** messaged UC-1 the following, “Letting my 19 [Glock 19] go for 11 [\$1,100] if somebody looking.” UC-1 replied “The one with the shark on it? [referring to the firearm shown during the interaction with DEVON DOW on or about March 18, 2022].” **Subject Phone 1** replied, “Yeah.” UC-1 replied, “Ight imma ask around for u.”

35. On or about April 18, 2022, UC-1 engaged in a series of text messages with **Subject Phone 1** regarding the Glock 19 style firearm referenced above. UC-1 messaged, “You still got the one with the shark on it?” **Subject Phone 1** replied, “Yeah.” UC-1 replied, “Lemme know if its still for sale I got a homie who want it I can probably pick it up this week.” **Subject Phone 1** replied, “It is but I wanted 11 [\$1,100] or 12 [\$1,200] for it it ran me like 980 [\$980].” UC-1 replied, “Ight I’m gonna see if he got 12 [\$1,200].” **Subject Phone 1** replied, “If not I do 11 [\$1,100].”

36. On or about April 26, 2022, **Subject Phone 1** messaged UC-1, “Yo.” On or about April 27, 2022, UC-1 replied, “Yo. I’m meeting with him later to get the

money.” **Subject Phone 1** then messaged in summary and not verbatim that DEVON DOW was currently in Lansing and would take \$50 off the price if UC-1 met him out there to purchase the firearm.

37. On or about May 3, 2022, UC-1 and DEVON DOW agreed to meet near the **Subject Premises** in order to complete the transaction for the firearm. UC-1, equipped with an audio and video recording device, drove past the location at approximately 6:43 p.m. Approximately one minute later, UC-1 placed a recorded call to **Subject Phone 1** and stated there was an unmarked police vehicle parked out front of the **Subject Premises**. DEVON DOW stated, “Yeah I see them, they [the police] are like right there.” At about the same time, LEOs on physical and electronic surveillance observed the curtains of the **Subject Premises** move. An image of the scene, captured on POD camera, is depicted below with the **Subject Premises** circled.



38. UC-1 asked DEVON DOW if DEVON DOW wanted to conduct the transaction at the **Subject Premises** as to avoid the police presence. UC-1 stated, “You want me to, you want me to just walk up [to the **Subject Premises**]? And then you crack that door [the leading to the **Subject Premises**] right there and then I walk back to the car? And then you aint even gotta come out.” DEVON DOW replied that his grandma does not want him to come downstairs because of the unmarked squad car is parked outside. DEVON DOW also stated that he did not want to do the transaction in the **Subject Premises** because “they got what they got up here and shit.” Further, DEVON DOW stated, “they [the police] in the front [of the **Subject Premises**]. They ain’t even on their computers.”<sup>14</sup> At approximately 7:00 p.m., the unmarked police vehicle departed the area.

39. Shortly after the unmarked police vehicle departed the area. UC-1 received an incoming call from DEVON DOW, using **Subject Phone 1**, informing UC-1 that the unmarked police vehicle has left the area and for UC-1 to pull into the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**). At approximately 7:03 p.m., UC-1 arrived in the parking lot next to 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**).

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<sup>14</sup> From where the unmarked police vehicle was parked, LEOs believe the only possible vantage point to observe the police officers inside the vehicle is the windows of the **Subject Premises** that is circled above.



40. One minute later, at approximately 7:04 p.m., using a POD camera, LEOs observed DEVON DOW exit the front door of the **Subject Premises** carrying a laundry bin and walk towards UC-1. DEVON DOW approached UC-1 in the parking lot of 1346 East 75<sup>th</sup> Street (the building that contains the **Subject Premises**) carrying a laundry bin and placed the laundry bin into the trunk of UC-1's vehicle. UC-1 reached into the laundry bin, retrieved the firearm, and placed it into UC-1's vehicle. UC-1 then placed \$1,100 into DEVON DOW's laundry bin in exchange for the firearm. UC-1 then reentered UC-1's vehicle and departed the area. Law enforcement observed DEVON DOW depart the parking lot on foot, enter the laundromat for a few seconds, exit the laundromat, and then enter the front of the **Subject Premises**. Upon conclusion of the transaction, the item placed into the trunk was identified as one (1) polymer 80, Glock 19 style, 9-millimeter semi-automatic firearm, bearing no serial number.<sup>15</sup> An image of DEVON DOW captured on the UC recording from the transaction is below.

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<sup>15</sup> It is believed, based on appearance, to be the same firearm from the text message image that DEVON DOW showed UC-1 on or about March 18, 2022. This firearm was transferred to the CPD Crime Laboratory Division for testing and analysis. The results are currently pending.



41. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe DEVON DOW exited the **Subject Premises** with one polymer 80, Glock 19 style, 9-millimeter semi-automatic firearm and then delivered the firearm to UC-1 in exchange for money. Further, DEVON DOW disguised the contents in a laundry bin and stopped inside the laundromat in order to disguise the transaction from police presence. Lastly, I believe DEVON DOW orders the firearm parts to the **Subject Premises**, and also manufactures the firearms at the **Subject Premises**.

## II. **FACTS SUPPORTING PROBABLE CAUSE TO BELIEVE EVIDENCE, INSTRUMENTALITIES, AND FRUITS WILL BE FOUND IN THE SUBJECT PREMISES AND SUBJECT PHONE 1**

42. During the investigation, law enforcement has identified the **Subject Premises** as a premises used by DEVON DOW in furtherance of firearms manufacturing. Law enforcement, based on its investigation, believes that there are two units at 1346 East 75th Street: one commercial unit, used as a laundromat, at the first floor, and a second residential unit on the second floor, being the **Subject**

**Premises.** In addition to the surveillance described above, information obtained from the United States Postal Service shows that DEVON DOW receives mail to the **Subject Premises**. Specifically, from approximately March 1, 2022, through approximately April 6, 2022, DEVON DOW received approximately fourteen parcels containing suspected gun parts<sup>16</sup> from various gun parts manufacturers addressed to DEVON DOW at the **Subject Premises**. Further, DEVON DOW has been seen exiting the front of the **Subject Premises** before the firearms transaction with UC-1 and UC-2 and then returning to the **Subject Premises** at the conclusion of each transaction. During some of these transactions, and recorded calls, DEVON DOW has relayed to UC-1 how he customizes the firearms parts, the process to build the firearms, and which parts of the firearms he is able to customize. In addition, as noted above, during the law enforcement encounter with DEVON DOW on or about January 31, 2022, DEVON DOW stated to officers' that his address is the **Subject Premises**.<sup>17</sup>

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<sup>16</sup> This conclusion is based on the fact that, through open-source research, law enforcement identified the sender names/addresses as various gun part manufacturers. For example, packages were sent from Drummagazines, LLC, Steel City Arsenal, GoToGear, HGW (Hooper Gun Works), among others. These websites sell a variety of gun parts used in the manufacturing of firearms.

<sup>17</sup> Through investigative methods, open-source research, utility checks, and surveillance, law enforcement believes there is at least one other individual (Individual B) living in the **Subject Premises**. LEOs believe this because during the transaction on May 3, 2022, DEVON DOW stated to UC-1 that he did not want to conduct the transaction in the **Subject Premises** due to other people having items in the **Subject Premises** as described above. Additionally, during the transaction on or about May 3, 2022, DEVON DOW stated that his grandmother (Individual B) did not want him to come outside of the **Subject Premises** due to police presence. Lastly, as explained above, LEOs believe that the exterior door labeled "1346-2" leads to one apartment unit (the **Subject Premises**).

43. During the transaction on May 3, 2022, after being informed by law enforcement that an undercover police vehicle was outside the **Subject Premises**, law-enforcement officers on mobile surveillance observed the curtains move on the **Subject Premises**. Additionally, DEVON DOW was able to see inside the unmarked police vehicle from where he was located thus LEOs believe the **Subject Premises** is 1346 East 75<sup>th</sup> Street, #2, Chicago, Illinois.

44. Lastly, on or about May 16, 2022, law-enforcement officers spoke with the owner of the building that contains the **Subject Premises**. The owner stated that there is one apartment behind the exterior door that reads 1346-2 and this apartment unit contains three bedrooms and spans from the rear of the building to the front on the second floor. Based on this information, LEOs believe this unit would include the window with the curtain movement on or about May 3, 2022.

45. According to ComEd utility checks, there are two listed apartments on the second floor: 2F and 2R. Additionally, ComEd utility checks show apartment 2F and 2R currently do not have active service. Despite that information, I and other LEOs believe that there is only one unit on the second floor—the **Subject Premises**—based on the information provided by the building’s owner, surveillance conducted on the premises, and DEVON DOW’s statement to LEOs in January 2022 that the **Subject Premises** is his residence.

46. Based on my training and experience, the training and experience of other law-enforcement members with whom I have consulted, and my experience in this investigation, I believe DEVON DOW receives gun parts to the **Subject**

**Premises**, as well as assembles the firearms inside the **Subject Premises**. As such, I believe DEVON DOW stores the evidence, instrumentalities, and fruits of manufacturing and distributing firearms within the **Subject Premises**.

47. Based on my training and experience, gun manufacturers generally use electronic devices connected to the Internet to purchase firearm components. For example, during the meet with UC-1 on or about January 26, 2022, DEVON DOW referenced using E-Bay to order firearm components. In addition, based on my training and experience, I know that firearm-component suppliers often request a user's contact information, including email address, through which the supplier may contact the user with information regarding the purchase and delivery. Furthermore, based on my training and experience, and the training and experience with other LEOs with whom I have consulted, I know that users, such as DOW, seeking to purchase firearm components online often use their devices to perform Internet searches regarding various parts, suppliers, user reviews, and/or information regarding assembly, maintenance, and functionality. While such activity may be conducted through a smart cellular telephone, such as **Subject Phone 1**, based on my training and experience, gun manufacturers often use other devices, such as laptops, smart pads, or desktop computers to perform the same activity. As a result, I believe that if devices appearing to belong to DEVON DOW, apart from **Subject**

**Phone 1**, are found in the **Subject Premises**, such devices will likely contain evidence, or constitute instrumentalities, of the Subject Offense.<sup>18</sup>

48. With respect to **Subject Phone 1** specifically, law enforcement believes that phone has been used by DEVON DOW based on a voice comparison done by UC-1 of the recorded phone calls compared to the voice of DEVON DOW during the in-person transactions. Additionally, during the firearms transaction on or about January 14, 2022, DEVON DOW provided the telephone number of **Subject Phone 1** to UC-1 to facilitate future firearms transactions. Further, DEVON DOW has utilized **Subject Phone 1** to coordinate firearms transactions with UC-1 with pictures of firearms, pricing, meeting locations for sale of firearms, and customization of firearms.

49. Based on my training and experience, the training and experience of other law-enforcement members with whom I have consulted, and my experience in this investigation, I believe DEVON DOW utilizes **Subject Phone 1** to order gun parts and communicate with customers regarding the sales of firearms. I believe that **Subject Phone 1** will likely contain evidence of customers that have purchased firearms from DEVON DOW, as well as likely contain evidence of other firearms manufactured and sold by DEVON DOW while also assisting law enforcement in identifying any currently unknown co-conspirators. As such, I believe **Subject**

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<sup>18</sup> Such devices, without limitation, may appear to be used by DEVON DOW based on their location (*e.g.*, in a bedroom appearing to be his), appearance (*e.g.*, marked with his name), and/or statements made by others in the home regarding by whom a particular device is used.

**Phone 1** will contain the evidence and instrumentalities of manufacturing and distributing firearms.

### **III. PROCEDURES TO BE FOLLOWED IN SEARCHING ELECTRONIC STORAGE MEDIA**

50. Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant will authorize the removal of electronic storage media and copying of electronically stored information described in Attachments A-1 and A-2 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol.

51. The review of electronically stored information and electronic storage media described in Attachments A may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachments B;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3)

contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachments B;

d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachments B.

### CONCLUSION

52. Based on the above information, I respectfully submit that there is probable cause to believe that DEVON DOW has committed the offense of willfully engaging in the business of dealing in firearms without a license in violation of Title 18, United States Code, Section 922(a)(1)(A).

53. Further, based on the above information, I respectfully submit that there is probable cause to believe that the offense of willfully engaging in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A) has been committed, and that evidence, instrumentalities, and fruits relating to this criminal conduct, as further described in Attachments B, will be found in the **Subject Premises**, as further described in Attachment A-1, and **Subject Phone 1**, as described in Attachment A-2.

54. Based on the foregoing facts, I respectfully submit there is probable cause to believe that DEVON DOW violated Title 18, United States Code, Section



922(a)(1)(A), in that DEVON DOW did willfully engage in the business of dealing in firearms without a license.

55. Additionally, I respectfully submit that there is probable cause to believe that willfully engaging in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A), have been committed, and that evidence, instrumentalities, and fruits relating to this criminal conduct will be found in the **Subject Premises**, more particularly described in Attachment A-1; and **Subject Phone 1**, more particularly described in Attachment A-2, authorizing the seizure of the items described in Attachments B, pursuant to the protocol described in the addendums to Attachments B.

FURTHER AFFIANT SAYETH NOT.

Respectfully submitted,

*Christopher B. Perugini / by HKM*

Christopher B. Perugini  
Special Agent  
Homeland Security Investigations

Sworn to and affirmed by telephone 24th day of May, 2022.

*Heather K. McShain*

Honorable Heather K. McShain  
United States Magistrate Judge