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Magistrate Judge Theresa L. Fricke

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

ROSS A. HEINZINGER and
ASHLEY N. LEWIS,
Defendants.

CASE NO. 3:24-mj-05016

COMPLAINT for VIOLATION

Title 21, U.S.C., Section 841(a)(1); Title
26, U.S.C., Section 5861(d); Title 18,
U.S.C., Section 922(o)

BEFORE, THERESA L. FRICKE, United States Magistrate Judge, U. S.
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Possession of a Controlled Substance with Intent to Distribute)

On or about December 8, 2022, in Jefferson County, within the Western District of
Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly and
intentionally possess, with the intent to distribute, and aid and abet the possession of,

1 with the intent to distribute, a controlled substance, including: N-phenyl-N-[1-(2-
2 phenylethyl)-4-piperidinyl] propenamide (fentanyl), a substance controlled under Title
3 21, United States Code.

4 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

5 **COUNT 2**

6 **(Unlawful Possession of an Unregistered Silencers)**

7 On or about December 8, 2022, in Jefferson County, within the Western District of
8 Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly possess
9 silencers, that is: ten silencers without serial numbers, black in color, which were not
10 registered to them in the National Firearms Registration and Transfer Record.

11 All in violation of Title 26, United States Code, Sections 5861(d), 5845(a)(7), and
12 5871.

13 **COUNT 3**

14 **(Unlawful Possession of Machineguns)**

15 On or about December 8, 2022, in Jefferson County, within the Western District of
16 Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly possess
17 machineguns, that is: eleven 3D printed Glock Conversion Devices bright green and
18 black in color.

19 All in violation of Title 18, United States Code, Section 922(o).

20 **COUNT 4**

21 **(Possession of a Controlled Substance with Intent to Distribute)**

22 On or about October 26, 2023, in King County, within the Western District of
23 Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly and
24 intentionally possess, with the intent to distribute, and aid and abet the possession of,
25 with the intent to distribute, a controlled substance, including: N-phenyl-N-[1-(2-
26 phenylethyl)-4-piperidinyl] propenamide (fentanyl), a substance controlled under Title
27 21, United States Code.

1 All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

2 **COUNT 5**

3 **(Unlawful Possession of Machineguns)**

4 On or about October 26, 2023, in King County, within the Western District of
5 Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly possess
6 machineguns, that is: one privately made rifle chambered to .223 caliber ammunition
7 with no serial number, black in color with a blue handle, blue magazine release button,
8 blue selector switch, blue trigger guard, blue foregrip, blue charging handle, fitted with a
9 collapsable and folding stock, a barrel threaded to accept a silencer, and equipped with a
10 trigger mechanism that does not reset after a single pull of the trigger; and one privately
11 made rifle chambered to .22 caliber ammunition with no serial number, black in color
12 with a tan upper, a holographic red dot sight, fitted with a collapsable and folding stock, a
13 threaded barrel to accept a silencer, and equipped with a trigger mechanism that does not
14 reset after a single pull of the trigger.

15 All in violation of Title 18, United States Code, Section 922(o).

16 **COUNT 6**

17 **(Unlawful Possession of Unregistered Firearms)**

18 On or about October 26, 2023, in King County, within the Western District of
19 Washington, ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly possess
20 short barreled rifles, that is: four privately made firearms without serial numbers, each
21 chambered to 9mm ammunition, one having a white cerakote finish and a folding stock
22 outfitted with a barrel 7¾ inches in length; one with a gold handle, green foregrip and
23 folding stock, having a barrel 5¾ inches in length; one black rifle with a red shoulder pad
24 on the stock having a barrel 11 inches in length; and a black rifle with an upper marked
25 “PW9” equipped with a folding stock, having a barrel 7½ inches in length, all of which
26 have barrel lengths less than 16 inches and were not registered to them in the National
27 Firearms Registration and Transfer Record.

1 All in violation of Title 26, United States Code, Sections 5861(d), 5845(a)(3), and
2 5871.

3 And the complainant states that this Complaint is based on the following
4 information:

5 I, J. BENJAMIN HUNT, being first duly sworn on oath, depose and say:

6 1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and
7 Explosives (ATF), currently assigned to the Seattle I Field Office. I completed the
8 Federal Law Enforcement Training Center's Criminal Investigator Training Program and
9 the ATF National Academy's Special Agent Basic Training in Glynco, Georgia, in 2005.
10 Originally assigned to the ATF New York Field Division, I worked in the Joint Firearm
11 Task Force in New York Group V and later New York Group I, a gang investigation
12 group. Both groups were in Brooklyn. In 2010, I transferred to Seattle, Washington,
13 where I have worked in ATF Seattle Group V, Violent Gang Task Force, and now in
14 Seattle Group I, which is responsible for investigating violent crime with firearms south
15 of Seattle to Tacoma and on the Olympic Peninsula. I have completed numerous trainings
16 since the ATF Academy to include the NYPD's Homicide Investigator Course, and
17 ATF's Complex Investigations and Advanced Investigations schools. During my career I
18 have worked cases up and down the Eastern seaboard and the West Coast. From 2014 to
19 2017, I was a Digital Media Collection Specialist. Currently I am a member of ATF's
20 enhanced undercover program and I have been for the last six years. I have worked
21 extended details in Baltimore, MD, Winston-Salem, NC, Southern California, Northern
22 California, and Portland, OR.

23 2. During my professional experience I have conducted and participated in
24 numerous investigations regarding the illegal possession of firearms, firearm trafficking,
25 violent crime, and narcotics. I have participated in undercover operations, Title III
26 wiretap investigations and the execution of search warrants associated with investigative
27 targets, and the execution of the arrest warrants on those investigative targets. I have

1 conversed at length with investigative targets in an undercover capacity and overtly as a
2 law enforcement officer in formal interviews. I have conducted undercover purchases of
3 firearms and ammunition, grenades, cocaine, crack cocaine, heroin, methamphetamine,
4 fentanyl, and other opioid pills. In an undercover capacity, I have been involved in
5 money laundering investigations and I have investigated bulk cash smuggling as well.
6 Most of my investigative experience has involved individuals dealing narcotics with
7 firearms and organized entities from Criminal Street Gangs to International Drug
8 Trafficking Organizations and Terror Groups. As such, I am familiar with the modus
9 operandi of those conducting violent crime and narcotics related crimes with firearms and
10 firearm trafficking. I am also familiar with the way drug traffickers use telephones, often
11 cellular telephones, to conduct their unlawful operations, and how they code their
12 conversations to disguise their unlawful activities.

13 3. I have obtained the facts set forth in this affidavit through my personal
14 participation in the investigation described below. I have also learned facts related to this
15 investigation from speaking with officers and detectives from the Jefferson County
16 Sheriff's Office, reading their written reports, reviewing video footage of the events
17 involving ROSS A. HEINZINGER and ASHLEY N. LEWIS, reviewing photographs of
18 evidence, and conducting my own investigation of HEINZINGER and LEWIS in which I
19 have also read and observed records, documents and other evidence obtained during this
20 investigation. Because this affidavit is submitted for the limited purpose of establishing
21 probable cause, it does not set forth every fact that I or others have learned during this
22 investigation. I have set forth only the facts that I believe are necessary to establish
23 probable cause to believe that ROSS A. HEINZINGER and ASHLEY N. LEWIS have
24 committed violations of Title 21, United States Code, Section 841(a)(1) (Possession of
25 Controlled Substances with Intent to Distribute), Title 26, United States Code, Section
26 5861(d) (Unlawful Possession of an Unregistered Firearm), and Title 18, United States
27 Code, Section 922(o) (Unlawful Possession of a Machinegun).

1 4. At about 6:40 PM on December 8, 2022, Jefferson County Sheriff's Office
2 (JCSO) Sgt. Menday saw a white Cadillac Escalade bearing Washington plate CCK9122
3 parked near the Village Store in Port Ludlow, WA. The Escalade was running and
4 straddling two parking spots. About 40 minutes later, when Sgt. Menday returned to his
5 own vehicle (which was parked nearby), the Escalade was still in the same spot and the
6 engine was running. He saw there were two occupants in the Escalade, both completely
7 hunched over forward, in a position commonly seen with those under the influence of
8 opiates. Based on his training and experience, Sgt. Menday believed the two people were
9 under the influence of opiates. The driver began to stir and moved around slightly, before
10 hunching over forward again. Sgt. Menday approached the Escalade and contacted the
11 male driver. Sgt. Menday could see burnt foil, consistent with smoking fentanyl, inside
12 the car and asked the driver to get out of the vehicle. Upon opening the door, Sgt.
13 Menday noticed a bag of blue pills placed in the recessed portion of the armrest on the
14 driver's door as well as a blue Motorola cellular phone on the floor of the driver's side
15 compartment. Sgt. Menday believed the quantity of blue pills, which he suspected to be
16 fentanyl, was consistent with distribution, not personal use. He estimated there were
17 several hundred pills in the bag. Sgt. Menday could also see a digital scale in the center
18 console.

19 5. Sgt. Menday and other responding deputies detained the driver and read
20 him his *Miranda* rights. The driver identified himself as ROSS ALAN HEINZINGER
21 and stated, in sum, that he was seeking help for his drug problem but had not been able to
22 start a suboxone prescription that he just received. Sgt. Menday asked HEINZINGER
23 about the bag with the blue pills and HEINZINGER said, "yeah man you know what that
24 is." The deputies asked HEINZINGER if he had any weapons and HEINZINGER told
25 them he had a gun in his belt. The deputies retrieved the firearm, a Privately Made
26 Firearm (PMF) commonly referred to as a "ghost gun" (i.e., a firearm drilled from an
27 80% lower and without a serial number), that HEINZINGER stated he had made himself.

1 HEINZINGER told the deputies that he had recently had his firearms rights restored but
2 admitted he did not have a concealed carry permit. HEINZINGER was then placed into a
3 marked vehicle and told that he was being arrested. The deputies processed the firearm
4 and the bag of suspected fentanyl pills incident to the arrest.

5 6. Deputies had also contacted the female passenger of the vehicle, later
6 identified as ASHLEY LEWIS, and asked her to step out while they spoke with
7 HEINZINGER. Since it was cold, she opted to wait in the back of one of the patrol
8 vehicles. After HEINZINGER had been placed into custody, the deputies spoke with
9 LEWIS outside of the patrol vehicle. Sgt. Menday read LEWIS her *Miranda* rights.
10 LEWIS stated that the two of them had been boyfriend and girlfriend for the last 14 years
11 and that they were trying to get help. When asked about the firearm, LEWIS stated that
12 HEINZINGER carried it “for fun” and stated that, “he’s into them, he got rights back.”
13 LEWIS was generally disinterested in answering any questions but repeatedly asked the
14 officers if she could go home if HEINZINGER would just “take the blame” to everything
15 and explained that she had a child at home to get back to. Deputies arrested LEWIS and,
16 during processing, recovered a blue, suspected fentanyl, pill in her jacket pocket.

17 7. JCSO deputies obtained a state search warrant for the vehicle and on
18 December 14, 2022, executed the warrant. Inside, deputies found foil with burnt residue
19 throughout the vehicle; digital scales; the blue Motorola cellular phone; wallets and
20 identifications for HEINZINGER and LEWIS; multiple prescription bottles in the names
21 of HEINZINGER and LEWIS; seven Privately Made Firearms (PMF) without serial
22 numbers, to include one short-barreled rifle and several with threaded barrels; a Baretta
23 APX, 9mm pistol, serial number A087751X; a Ruger LCP, .380 caliber pistol, serial
24 number 380254872; a Glock 34, 9mm pistol, serial number BHUW254; 12 silencers; 11
25 Glock Conversion Devices; loaded high capacity magazines; ammunition; and
26 \$53,700.00 cash in vacuum-sealed bags.

1 8. The 11 silencers were black in color, had no serial numbers on them, and
2 were threaded to different barrel sizes with different internal components, designed to
3 diminish the report of a shot fired from the firearm to which they are affixed. Glock
4 Conversion Devices are commonly referred to as “Glock switches” or “auto sear switch
5 devices.” When installed on a firearm, the Glock Conversion Devices allow the firearm
6 to shoot automatically, which is to say that the firearm can shoot more than one shot by a
7 single function of the trigger, making the firearm a “machinegun” as that term is defined
8 by law. Six of the 11 Glock Conversion Devices were 3D printed as one piece with no
9 movable parts, which attach to a firearm where a semi-automatic backplate would be
10 affixed. The other five were parts consisting of a body, legs, and pins, which, when
11 affixed to a pistol where the backplate would go, can be toggled to allow the firearm to
12 switch back and forth from a semi-automatic to a fully automatic firearm. The 11 Glock
13 Conversion Devices were bright green and black, as shown below.



23
24 9. The parts are solely and exclusively designed and intended for use in
25 converting a semi-automatic Glock pistol into a machinegun, therefore each of the 11
26 Glock Conversion Devices is also a “machinegun” as defined in 26 U.S.C. § 5845(b).
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1 10. JCSO deputies have since determined that there were over 700 suspected
2 fentanyl pills (which weighed to 101.22 grams with evidence packaging included) in the
3 Cadillac Escalade. I know, based on my training and experience, that this is a
4 distribution, not personal use, quantity of pills. HEINZINGER and LEWIS were charged
5 in Jefferson County Superior Court with Possession with Intent to Manufacture or
6 Deliver a Controlled Substance – Fentanyl; HEINZINGER has also been charged with
7 Carrying a Concealed Weapon.

8 11. On March 15, 2023, I met with JCSO Sgt. Menday and Det. Allen at the
9 JCSO. JCSO released the blue Motorola cellular phone to my custody. On April 6, 2023,
10 Magistrate Judge Theresa L. Fricke signed a search warrant authorizing a search of the
11 blue Motorola cellular phone. From the data obtained from that phone, on June 13, 2023,
12 United States Magistrate Judge David W. Christel signed a search warrant authorizing the
13 search of HEINZINGER’s Facebook account and, on August 7, 2023, United States
14 Magistrate Judge David W. Christel signed a search warrant authorizing the search of
15 HEINZINGER’s Google account.

16 12. My review of the data stored on the phone shows that HEINZINGER has
17 had multiple conversations regarding his distribution of fentanyl and manufacturing
18 firearms and machineguns for himself and others. Regarding fentanyl pills,
19 HEINZINGER often refers to them in conversation as “pills” or “blues.” For example, in
20 the first of two video messages a male sent to HEINZINGER on October 17, 2022, the
21 male told HEINZINGER, “I have something for you. Two dollar. Two dollars for the
22 whole thing right now bro.” In the second video message the male told HEINZINGER,
23 “If you buy the whole boat [a term drug dealers use referring to 1,000 pills] one seventy-
24 five bro, a dollar seventy-five cents bro,” referring to a price of \$1.75 per pill.

25 13. In a December 2, 2022, text message conversation with a contact listed as
26 “SHELBY 2021,” after HEINZINGER wrote “I guarantee I can do better for you,”
27 SHELBY 2021 wrote, “Hey. Sorry if u r asleep... but I just drove out to auburn too [sic]

1 meet my Dude and he blew me off I guess.. been sitting here for almost 1.5 hrs ...I get a
2 screaming deal but what do u think u could maybe do for me..?” and indicated she
3 usually got “at least half a boat too [sic] a whole boat.” HEINZINGER wrote he would
4 “do a boat for 1.05 and if it’s consistent it can go down quite a bit lower.” Shortly after
5 the text conversation ended, HEINZINGER had a 35-second phone conversation and
6 another phone conversation with SHELBY 2021 that lasted one minute and 17 seconds.

7 14. There were several other conversations on the phone referencing
8 HEINZINGER’s drug distribution, and videos from his Google account that showed
9 HEINZINGER and LEWIS’s drug distribution. For example, in a video recorded on
10 February 2, 2023, HEINZINGER is seen at the passenger’s side door of the Cadillac
11 Escalade, and HEINZINGER and LEWIS are discussing how bad one of their customers
12 looks. HEINZINGER then departs. LEWIS then exits her vehicle and walks between her
13 Cadillac Escalade and HEINZINGER’s red Ford V10 F-250 truck bearing WA license
14 plates C35772Z to another vehicle. She gets in and the customer asks for “the usual.”

15 15. Another video from HEINZINGER’s Google account, recorded January 30,
16 2023, appears to be an accidental recording where the camera is panning haphazardly
17 inside the Cadillac Escalade. I observed several clear bags containing what appears to be
18 M30 fentanyl pills. Also stored in HEINZINGER’s Google account was a photo of a Luis
19 Vuitton purse filled with large plastic bags, eight that are visible, containing what appear
20 to be M30 fentanyl pills in quantities of 1,000 per bag. Google captured that photo on
21 January 17, 2023.

22 16. Saved on his phone and stored in HEINZINGER’s Google account,
23 HEINZINGER had numerous videos from security cameras inside his apartment in Black
24 Diamond, WA. From these videos I saw a money counter in HEINZINGER’s bedroom.
25 HEINZINGER and LEWIS had photos and videos of large amounts of cash inside their
26 apartment. In a video captured by Google on April 10, 2023, I observed a large bundle of
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1 cash on the center console of LEWIS and HEINZINGER's Cadillac Escalade and heard
2 LEWIS stating, "that's fifteen-two."

3 17. From HEINZINGER's phone and backed up in his Google account, I
4 observed numerous videos filmed from April 2022 through May 2023, where
5 HEINZINGER had a drill press on the counter of the island in his kitchen. I observed
6 several videos which show Polymer 80 boxes on the counter next to the drill press and in
7 their living room. Polymer 80 is a company that sells unfinished firearm receiver frames.
8 Considered 80% completed, the company sells unfinished firearm receivers to its
9 customers who then place the unfinished firearm receiver into a jig supplied by Polymer
10 80 that shows where the customer needs to drill several holes to finish the manufacturing
11 of the receiver. Once the customer drills the holes it is then 100% complete and a
12 functioning firearm receiver and, for the purposes of federal law, it is considered a
13 privately made firearm (PMF). Under federal law, PMFs do not need serial numbers,
14 unless the maker transfers it to another person, and 80% receivers do not need to be
15 logged or accounted for as firearms. Because they are not serialized, these PMFs are not
16 traceable.

17 18. On his phone, HEINZINGER also had photos of full auto trigger
18 mechanisms for an AR-15 as well as a downloaded video on how to assemble a full auto
19 trigger and screenshot of the video. HEINZINGER's Google Drive had several .stl files
20 stored in it for 3D printing silencers and Glock Conversion Devices. HEINZINGER's
21 web search history on his phone and from his Google account revealed searches using
22 terms to find items used to assemble PMFs and machineguns. HEINZINGER's Gmail
23 account contained messages from numerous online retailers of firearms and firearms
24 parts. One email reflected an order HEINZINGER made from Midway USA for a "Glock
25 Factory Trigger Spring." Another email between HEINZINGER and eBay seller "jy-
26 tangtown" referenced a purchase, return and replacement of a silencer that resembled
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1 several of the silencers recovered from HEINZINGER during his December 2022 arrest
2 by the JCSO.

3 19. On his phone and backed up in his Google account, HEINZINGER had
4 several videos showing his involvement in the manufacture of a firearm for another
5 individual. I have identified that other individual as a convicted felon and refer to him
6 here as Male-1. In the first video of the series, from November 1, 2022, HEINZINGER
7 can be seen hiding his cell phone behind him as it recorded a meeting with Male-1. In the
8 video, HEINZINGER can be seen holding a pistol with a threaded barrel. HEINZINGER
9 racked the firearm and handed it to Male-1. HEINZINGER complained that Male-1 no
10 longer had the firearm that he (HEINZINGER) previously gave Male-1, expressing worry
11 because his (HEINZINGER's) DNA was on the gun. Male-1 told HEINZINGER, in sum,
12 not to worry because he would always clean a gun "before I blast somebody."
13 HEINZINGER showed Male-1 a fully automatic pistol and explained to him how it
14 worked, explaining to Male-1 how a Glock Conversion Device works. HEINZINGER
15 told Male-1 "so, I'm going to make a couple of these and they're going to be like
16 straight... I'm not going to get rid of this one [which I understand meant he would not
17 give the one he had at that time to another person] because this one is too obvious, but I
18 have, actually, the carbon fiber filament that I got for the gun that's all black and I'm just
19 gonna...uh and they're going to be different pieces." HEINZINGER offered his services
20 fixing Male-1's Glock 19-style PMF. HEINZINGER offered Male-1 several other
21 machineguns that he (HEINZINGER) had. HEINZINGER told Male-1 that he had four
22 of them (referring to pistols) and that his girlfriend had one of his other ones. Male-1 told
23 HEINZINGER that he still had a "half a boat" (i.e., 500 fentanyl pills) and would have
24 HEINZINGER's money the next morning.

25 20. HEINZINGER and LEWIS's involvement in drug distribution and
26 possessing/manufacturing firearms continued after their arrests in December of 2022, and
27 into 2023. On October 18, 2023, I obtained federal search warrants for HEINZINGER

1 and LEWIS's Black Diamond apartment, Maple Valley Storage unit, and four vehicles
2 (the Cadillac Escalade, a Subaru WRX, a BMW M-3, and a Ford F-250 truck). In the
3 mid-afternoon of October 26, 2023, ATF agents and task force officers executed the
4 search warrants on the apartment, the storage unit, and three of the four vehicles. Neither
5 HEINZINGER nor LEWIS were home at the time, and I believe they were in the Cadillac
6 Escalade. However, I spoke briefly with the two by phone and told them agents were
7 executing the warrants. I asked if they had keys to their Subaru, BMW, or Ford inside the
8 apartment, and the couple responded that they had the keys with them but would be home
9 within a few hours. I spoke with them again around 5:00 p.m. and 7:00 p.m., and during
10 both calls they said they were on their way back home but needed more time. By 8:00
11 p.m., HEINZINGER and LEWIS had still not arrived and had turned off their phone.

12 21. During the search, agents found evidence of drug distribution and usage,
13 firearms possession, and firearm manufacturing to include cash, fentanyl pills, 3D printer
14 filament, a laptop computer, smart phones, a drill press, numerous firearm parts, high-
15 capacity magazines, 23 firearms (four of which are unregistered short-barreled rifles and
16 two of which are unregistered machineguns), four unregistered silencers, two ballistic
17 vests and over 2,300 rounds of ammunition.

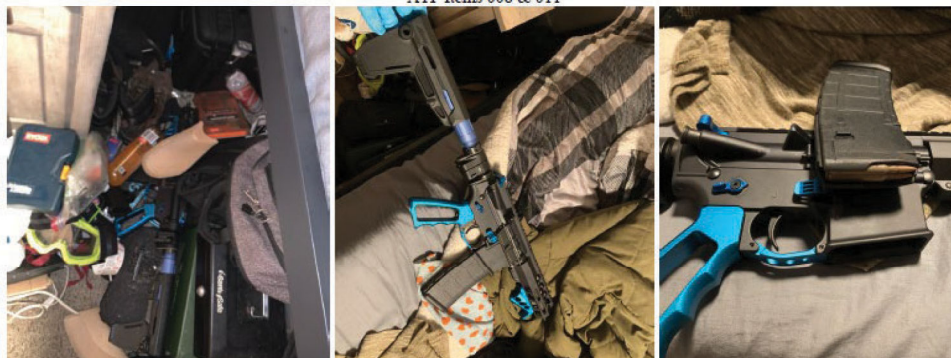
18 22. More specifically, agents found a loaded pistol wedged between the
19 cushion and arm of the couch in the living room of the apartment. The pistol was a
20 privately made firearm (PMF), 9mm, loaded with six rounds of ammunition. In the
21 master bedroom, agents found a Komando AV, model Dickinson Ranger BP, Bullpup 12-
22 gauge semi-automatic shotgun with a 20-round magazine on the left side of the bed
23 (propped up between the bed and the nightstand) and an unregistered 9mm PMF semi-
24 automatic short-barreled rifle with a folding stock on the ground between the nightstand
25 and the right side of the bed. On the nightstand on the left-hand side of the bed was a
26 magazine loaded with 14 rounds of 12-gauge ammunition and a PMF 9mm pistol loaded
27 with 8 rounds of ammunition. On the floor, between the nightstand on the left-hand side

1 of the bed and the bed laid an unregistered machinegun loaded with .223 caliber
 2 ammunition. On the nightstand on the left-hand side of the bed was a PMF 9mm pistol,
 3 and between the wall and the nightstand, in a box laid against the wall, was a PMF .762
 4 caliber rifle. In front of the nightstand was a 100-round dual drum magazine loaded with
 5 75 rounds of .223 ammunition. Additional rounds of ammunition and numerous firearms
 6 parts were inside the nightstand. Underneath the bed, agents found a Pelican case with 17
 7 pistol magazines (some loaded and some empty), and a second Pelican case with several
 8 firearm magazines and numerous bottles of methadone. Also underneath the bed were
 9 boxes of ammunition, two ballistic vests, and a backpack. The backpack contained an
 10 unregistered, PMF, .22 caliber machinegun with a folding stock, a loaded high-capacity
 11 magazine, and two silencers (which fit the machinegun).

12 23. In the master bedroom closet, agents found a safe that contained three PMF
 13 short-barreled rifles (one of which field-tested as a machinegun), several AR-15 uppers,
 14 and a functioning AR-15 lower (i.e., a firearm). The photos below show some of the
 15 items found in the master bedroom.



ATF Items 008 & 011





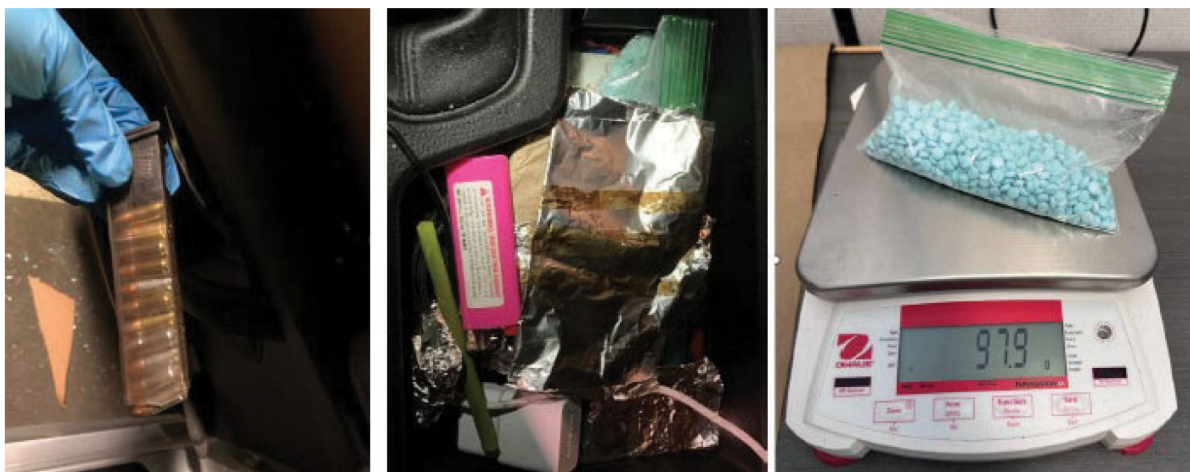
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24. In the bathroom, I found smoke damage to the ceiling and burn marks on the cabinets. The room was littered with foil from the smoking of fentanyl pills. On shelves in the bathroom, I found a jar of marijuana, two boxes of Naxalone (Narcan), two pistols, loaded magazines, and two flash suppressors. Inside the bathroom cabinet, I found a banded-up stack of cash and a small explosive device.

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25. On the kitchen island counter, agents found a laptop computer. There was 3D printer filament in the hall closet and in the master bedroom. In the hall closet, agents found rotary tools, AR-15 receiver jigs, another silencer, and firearm parts. In the garage belonging to the apartment unit, agents found a drill press.

1 26. In a red handbag in the apartment living room, agents found fentanyl pills
2 (approximately 9.3 grams) and indicia for LEWIS. In the BMW M-3, I found the
3 registration (showing HEINZINGER and LEWIS as the registered owners). Burnt foil, a
4 smoking straw, and a lighter were in the center console with a large bag of fentanyl pills
5 (97.9 grams). I know, based on my training and experience, that this is a distribution, not
6 personal use, quantity of pills. In the driver's side door panel, agents found a pistol
7 magazine loaded with 11 rounds of 9mm ammunition. The photos below show the loaded
8 magazine, center console, and the fentanyl pills.



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18 27. In the trunk of the Subaru WRX, I found a silencer with no serial number.
19 The vehicle registration listed HEINZINGER as the owner. In the Ford F-250, agents
20 found burnt foil in the center console, empty pistol ammunition boxes, a plastic hard-case
21 ammunition box containing two AR rifle magazines and 186 rounds of rifle and pistol
22 ammunition. In the back of the truck, the agents also found a Dremel tool. The vehicle
23 registration showed LEWIS as the owner.

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1 Based on the above facts, I respectfully submit that there is probable cause to
2 believe that ROSS A. HEINZINGER and ASHLEY N. LEWIS did knowingly and
3 intentionally commit violations of Title 21, United States Code, Section 841(a)(1)
4 (Possession of Controlled Substances with Intent to Distribute), Title 26, United States
5 Code, Section 5861(d) (Unlawful Possession of an Unregistered Firearm), and Title 18,
6 United States Code, Section 922(o) (Unlawful Possession of a Machinegun).

7
8
9 **JON HUNT** Digitally signed by JON HUNT
Date: 2024.01.19 15:32:29 -05'00'

10 J. BENJAMIN HUNT, Complainant
11 Special Agent, Bureau of Alcohol,
12 Tobacco, Firearms and Explosives

13 The above-named agent provided a sworn statement attesting to the truth of the
14 foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court
15 hereby finds there is probable cause to believe the Defendants committed the offenses set
16 forth in the Complaint.

17 Dated this 19th day of January 2024.

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20 THERESA L. FRICKE
21 United States Magistrate Judge
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