

FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

2018 MAR 30 AM 7:59

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
TOLEDO

AFFIDAVIT

I, William Noon, being duly sworn under oath, depose and state as follows:

1. I have been employed as a Toledo Policeman since 1997 and have been assigned to the Toledo Police Gang Task Force since 2002. Currently, I am assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a Task Force Officer (TFO) and have been since 2009. ATF is the federal law enforcement agency charged with the enforcement of federal statutes relating to firearms (Chapter 44, Title 18). As a TFO, I am responsible for the investigation of violations of federal criminal laws relating to the illegal acquisition, possession and distribution of firearms. I have received specialized training and experience relating to these statutes and am familiar with the manner in which firearms are unlawfully acquired, transported, distributed and possessed. I have conducted or participated in numerous investigations involving persons who illegally possess firearms.

2. This affidavit is submitted in support of a criminal complaint for Kelland WRIGHT, for being in possession of a firearm, in violation of Title 26, U.S.C. Section 5861(d). All of the information contained in this affidavit is the result of either my own personal observations or investigation, or has been provided to me by other law enforcement officers, all of whom I believe to be reliable. This affidavit contains information to establish probable cause for a criminal complaint. It is not intended to list each and every fact observed or known to me about this investigation.

3. On March 15, 2018, at approximately 11:00 p.m., Toledo Police Officers responded to a domestic violence report at 3033 Meadowwood Dr., Toledo, Ohio. Upon arrival, Toledo Police Officers Michael Jarosz and Bruce Cook, who were the responding officers, spoke with Person 1. Person 1 stated that Kelland WRIGHT had left prior to the officers' arrival, in his Toyota truck and took a rifle and two handguns with him.

4. Person 1 informed officers that WRIGHT had become aggressive, yelling and arguing. Person 1 stated that at one point WRIGHT threw his cell phone at her, causing her to duck. Person 1 stated that while sitting on the couch, WRIGHT struck her with a closed fist in the head from behind, near her right ear. Person 1 informed officers that her daughters were present and observed the assault.

5. Officers spoke with Juvenile 1, minor daughter to Kelland WRIGHT and Person 1, who confirmed that WRIGHT struck Person 1 in the head while Person 1 was sitting on the couch. The officers observed redness around Person 1's right ear.

6. Person 1 signed paperwork necessary to obtain a temporary protective order (TPO) related to Kelland WRIGHT. The officers issued warrants for Kelland WRIGHT.

7. At approximately 3:01 a.m., Toledo Police received a call stating that WRIGHT had returned to 3033 Meadowwood, Toledo, Ohio. Officers Jarosz and Cook, along with other Toledo Police units responded. Upon arrival, WRIGHT was seen in the driveway to the residence near a Toyota Tundra pickup truck. WRIGHT was taken into custody right away and asked about any weapons.

8. While standing in the garage with WRIGHT, officers observed a rifle leaning on the wall. WRIGHT was asked if the rifle was his. WRIGHT stated that the rifle was his wife's and that his firearms were in the kitchen. Officers entered the residence and

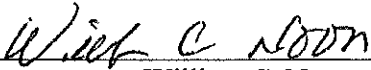
seized approximately 2000 rounds of ammunition along with six (6) firearms. One of the firearms was a Sharps Bros. AR-15 pistol; model The Jack, bearing serial number JACK12022. This firearm has a shoulder stock affixed and a fore grip affixed. The barrel length of the firearm is 9 and 7/8 inches, and the overall length of the firearm is 26 and 7/8 inches when the shoulder stock is extended. The firearm was located in the kitchen.

9. Based on the shoulder stock, fore grip and length of the firearm's barrel (9 and 7/8 inches), which is less than 16 inches, the firearm qualifies as a short-barreled rifle, as defined in 26 U.S.C. § 5845(a)(3) (defining short-barreled rifles), requiring the individual possessing this firearm is required to register the firearm with the National Firearms Registration and Transfer Record via the ATF National Firearms Act (NFA) Branch.

10. The characteristics of the firearm, that is, that it was a rifle having a barrel of less than 16 inches in length was visibly apparent from looking at it.

11. This Affiant conducted a NFA search through the ATF NFA Branch and found that Kelland WRIGHT has not registered the firearm with the National Firearms Registration and Transfer Record.

12. Based on the preceding statements, there is probable cause that Kelland WRIGHT knowingly possessed a NFA firearm, to wit: the short-barreled rifle described in paragraph 8, that was not registered to him in the National Firearm Registration and Transfer Record, in violation of Title 26, U.S.C. Section 5861(d).

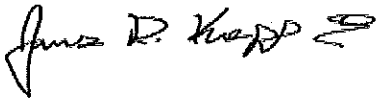


William C. Noon  
Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms & Explosives

**Mar 29, 2018**

Sworn to via telephone after  
submission by reliable electronic  
means. Crim. Rules. 4.1; 41(d)(3)





James R. Knepp, II  
United States Magistrate Judge