

AO 91 (Rev. 11/11) Criminal Complaint

ORIGINAL

UNITED STATES DISTRICT COURT  
for the  
Southern District of Georgia

FILED  
U.S. DISTRICT COURT  
AUGUSTA DIV.

2014 MAR 26 P 2:22

United States of America  
v.  
William Arnold Debow

Case No. 1:14mj11

CLERK TRC  
SO. DIST. OF GA.

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of \_\_\_\_\_ in the county of Burke in the  
Southern District of Georgia, the defendant(s) violated:

Code Section

18 USC 922(d)(1)

Offense Description

Transfer of Firearm to a Felon

SEALED AND  
IMPOUNDED

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Jason Stricklin incorporated as if fully set forth herein

Continued on the attached sheet.

Jason Stricklin  
Complainant's signature

Jason Stricklin, Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/26/14

Brian K. Epps  
Judge's signature

City and state: Augusta, Georgia

Brian K. Epps, U.S. Magistrate Court Judge  
Printed name and title

ORIGINAL

AFFIDAVIT

I, Jason S. Stricklin, being duly sworn depose and state the following that I am currently employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), having have been so employed since 2005, and am currently assigned to the Atlanta Field Division's Augusta Satellite Office. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. I have conducted and participated in numerous investigations involving violations of Federal laws, including violations of Title 18 of the United States Code. My duties and responsibilities involve investigations of violations of Federal criminal laws and I know that it is a violation of Title 18, United States Code, Section 922(d)(1), for any person to sell or dispose of any firearm or ammunition to any person, knowing or having reasonable cause to believe that such person has been convicted in a court of a crime punishable by imprisonment for a term exceeding one year.

SEALED AND  
IMPOUNDED

This affidavit is being filed based on the personal knowledge and observations of the affiant and other law enforcement personnel, and interviews with witnesses, and reviews of government and business records, including records, reports, and information from the ATF.

This affidavit is intended to support probable cause but it is not intended to convey all the facts of the investigation.

On October 16, 2013, ATF Special Agents and Task Force Officers executed a search warrant at a residence located in Augusta, Georgia, during which, approximately 26 firearms and approximately 7000 rounds of ammunition were seized from a convicted felon, hereafter referred

to as CW1. One of these firearms was identified as an **Alexander Arms LLC, model Beowulf, .50 caliber semiautomatic rifle, bearing serial number AABEO2973.**

Upon interviewing CW1 on October 17, 2013, he advised that the majority of the firearms in his possession were purchased directly from William Debow at Ponderosa Trading Company, a FFL located at 316 Ponderosa Road, Waynesboro, Burke County, Georgia, 30830. CW1 further stated that prior to any purchases from Debow, he advised Debow that he was a convicted felon. Debow advised CW1 to bring his mother to Ponderosa Trading Company so that required paperwork (i.e. ATF Form 4473) could be completed in his mother's name.

CW1 advised he would complete the paperwork in his mother's name and have her sign the forms. CW1 stated he would then pay Debow cash for the firearms. CW1 added that on some occasions he purchases firearms from Debow, at Ponderosa Trading Company, without completing any paperwork, and that the **Alexander Arms LLC, model Beowulf, .50 caliber semiautomatic rifle, bearing serial number AABEO2973** was one such purchase.

On October 23, 2013, I and other officers executed a federal search warrant at Ponderosa Trading Company. During this search warrant, ATF agents seized records relating to the acquisition and disposition of firearms by the business. Within these seized records were a number ATF Form 4473's completed by CW1's mother for many of the firearms found at his residence.

I have reviewed Ponderosa Trading Company records pertaining to the aforementioned **Alexander Arms LLC, model Beowulf, .50 caliber semiautomatic rifle, bearing serial number AABEO2973**. These records indicate that this firearm was sold by the business on June 1, 2012 to an individual, hereafter referred to as CW2. On November 8, 2013, an ATF Task Force Officer interviewed CW2 regarding this firearm.

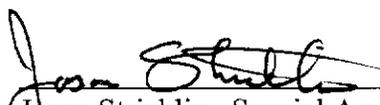
CW2 acknowledged that he purchased the firearm from Ponderosa Trading Company, but eventually traded it back to Ponderosa Trading Company for a different firearm. There are no entries in the records of The Ponderosa Trading Company's reflecting the transfer of the **Alexander Arms LLC, model Beowulf, .50 caliber semiautomatic rifle, bearing serial number AABEO2973** back to Ponderosa. CW2 advised that during both of the aforementioned transactions, he dealt personally with William Debow.

Sometime after the **Alexander Arms LLC, model Beowulf, .50 caliber semiautomatic rifle, bearing serial number AABEO2973** was traded back to Ponderosa by CW2, William Debow transferred this firearm to CW1, without completing any required paperwork, pursuant to federal law.

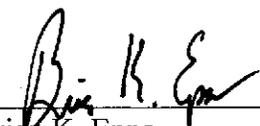
Further investigation has identified seven additional firearms that were transferred to CW1 by William Debow, while at Ponderosa Trading Company, without having to complete any of the required paperwork. ATF agents have interviewed the original purchasers of the identified firearms; including individuals that they subsequently sold the firearms to in private transactions, and it was learned that those firearms were eventually sold or traded to William Debow by

private individuals shortly before CW1 purchased them from William Debow. I submit that these transactions, like the transaction mentioned above, were conducted without paperwork in order to conceal the illegal nature of the transfer of firearms to a person known or believed to be a previously convicted felon.

Based on the foregoing facts and circumstances, I assert there is probable cause to believe that William Debow did sell or dispose of a firearm to a person, knowing or having reasonable cause to believe that such person had been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(d)(1).

  
\_\_\_\_\_  
Jason Stricklin, Special Agent  
Bureau of Alcohol, Tobacco, and Firearms,

Sworn to and subscribed before me this  
26<sup>th</sup> day of March, 2014

  
\_\_\_\_\_  
Brian K. Epps,  
United States Magistrate Judge  
Southern District of Georgia