

UNITED STATES DISTRICT COURT

for the Eastern District of California

FILED Sep 04, 2024 CLERK, U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

United States of America v. Joshua Eric BROWN Defendant(s)

Case No. 1:24-mj-00101-SAB

CRIMINAL COMPLAINT BY RELIABLE ELECTRONIC OR TELEPHONIC MEANS

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 September 3, 2024 in the county of Fresno in the Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Includes 18 USC 922(o), 26 USC 5861(d), Possession of a Machinegun, Possession of an Unregistered NFA Weapon, and maximum punishment details.

This criminal complaint is based on these facts: See attached affidavit of SA Ryan Steger.

Continued on the attached sheet.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone

Date: 09/04/2024

City and state: Fresno, California

Complainant's signature Ryan Steger, FBI Special Agent Printed name and title

Judge's signature Stanley A. Boone, US Magistrate Judge Printed name and title

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA ERIC BROWN.,

Defendant.

CASE NO.

AFFIDAVIT OF FBI SA RYAN STEGER IN  
SUPPORT OF COMPLAINT

I, Ryan Steger, Special Agent, Federal Bureau of Investigation, United States Department of Justice, being duly sworn, do depose and state:

**I. INTRODUCTION**

1. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that on or about September 3, 2024, Joshua Eric BROWN (herein after referred as BROWN) committed a violation of 18 U.S.C. § 922(o), Unlawful possession of a machinegun and 26 U.S.C. § 5861(d), Possession of an Unregistered NFA Firearm.

**II. EXPERTISE**

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C). I have been a Special Agent with the FBI since September 2018. I received basic law enforcement instruction at the FBI Academy from approximately September 2018 through February 2019. I have been assigned to FBI’s Safe Streets Task Force (SSTF) in Fresno, CA since February 2019.

3. Prior to joining the FBI, I was a prosecutor at the Kane County State’s Attorney’s Office in Kane County, Illinois from approximately November 2014 until September 2018. In that position, I prosecuted offenses ranging from traffic infractions to felony-level violent offenses, drug offenses, burglaries, and gang-related offenses, and as such have participated in numerous investigations of the same. As a prosecutor and a Special Agent, I have attended numerous trainings related to investigating and prosecuting gang-related, firearms-related, and drug-related crimes, which

1 most recently includes the California Gang Investigator's Association annual conference in Anaheim,  
2 CA in July 2023.

3 4. Through my training and experience, I am familiar with the identification of various  
4 firearms and firearms parts. I am also familiar with the various methods used by individuals to obtain,  
5 possess, manufacture, transport, and/or sell firearms. I am also familiar with the *modus operandi* of  
6 firearms traffickers with respect to the illegitimate use of the proceeds of the sale of such firearms and  
7 firearms parts in violation of federal law. These methods include the use of telephones, cellular  
8 telephones, wireless communication technology, counter surveillance, elaborately planned smuggling  
9 schemes tied to legitimate businesses, false or fictitious identities, and the use of coded or vague  
10 communications in a text message format in an attempt to thwart law enforcement interference with  
11 their operation(s). I have also interviewed firearms distributors/traffickers and have discussed with them  
12 the lifestyle, appearances, habits and methods of firearms distribution and trends.

13 5. I am familiar with the facts and circumstances of the investigation from discussions  
14 with detectives, agents of the FBI, and other law enforcement officers who are also actively involved  
15 in the investigation, as well as from my own review of records and reports relating to the investigation.  
16 Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information  
17 was provided by another agent, law enforcement officer, or witness who may have had either direct or  
18 hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have  
19 read and reviewed. Such statements are among many statements made by others and are stated in  
20 substance and in part unless otherwise indicated. Since this affidavit is being submitted for the limited  
21 purpose of filing a search warrant, I have not included details of every aspect of the investigation.  
22 Facts not set forth herein are not being relied on in supporting probable cause, nor do I request that this  
23 Court rely on any facts not set forth herein in reviewing this application.

24 6. Since this affidavit is being submitted for the limited purpose of securing an arrest  
25 warrant for the below-mentioned individuals, I have not included details or facts of every aspect of the  
26 investigation. Facts not set forth herein, or in the attached exhibits, are not being relied on in reaching  
27 my conclusion that the requested arrest warrants should be issued. Nor do I request that this court rely  
28 on any facts not set forth herein in reviewing this application and affidavit.

**III. PROBABLE CAUSE**

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2  
3 7. In June 2024, the Fresno FBI began an investigation into the activities of Joshua Eric  
4 BROWN with respect to the illegal possession of firearms. The investigative team subsequently  
5 authored search warrants to search the Instagram account and Google account associated with BROWN.

6 8. On September 2, 2024, I authored a search warrant to search [REDACTED],  
7 [REDACTED] (BROWN's Residence), cellular phone, and person based on photos and  
8 message threads contained in BROWN's Instagram account indicating he had manufactured a fully  
9 automatic MP5 firearm, that he possessed an unregistered suppressor, and that he had manufactured  
10 and/or possessed those items in BROWN's Residence.

11 9. The investigative team was aware that in addition to BROWN there was a female resident  
12 of the location.

13 10. On September 3, 2024, the investigative team executed the search warrant on BROWN's  
14 Residence. The team discovered two bedrooms in the apartment, one with primarily feminine clothing  
15 and décor, the female resident's room, and another with primarily masculine clothing, as well as military  
16 and firearms-related décor and paraphernalia.

17 11. At approximately 0613 hours, the investigative team observed BROWN as well as the  
18 female resident leave BROWN's residence. Both entered separate vehicles and departed the area. The  
19 investigative team did not observe anyone else enter or exit the residence until they made entry to execute  
20 the search. Additionally, when the investigative team subsequently made entry into the residence, team  
21 members observed that no other occupants appeared to live in the residence.

22 12. When team members searched BROWN's residence, they found the following items in  
23 various locations in the room with masculine clothing:

- 24 a. A fully automatic MP5 submachine gun in plain view on a storage bin near the  
25 bed;
- 26 b. A fully automatic AR-15-style rifle in the closet; and
- 27 c. Several firearm suppressors were located in a dresser drawer and in gear boxes  
28 in the closet.

1 13. It should be noted that both the MP5 and AR-15 were loaded.

2 14. When reviewing the contents of BROWN's Instagram account, team members observed  
3 that the MP5, AR-15 and one of the suppressors BROWN posted to his account appeared to be the same  
4 MP5, AR-15 and suppressor recovered in his apartment.

5 15. On September 3, 2024, I interviewed BROWN after he waived his Miranda rights. He  
6 admitted that the MP5, AR-15, and suppressors belonged to him. He further admitted that he knew the  
7 MP5 and AR-15 were capable of fully automatic fire.

8 16. Team members checked the National Firearms Registration and Transfer Record and  
9 observed that BROWN had not registered the suppressors, the MP5, or the AR-15 as required by law.

10 17. Additionally, the same day (September 3, 2024) FBI agents test-fired the MP5 and AR-  
11 15 seized at BROWN's residence and confirmed that they both could fire multiple shots with a single  
12 pull of their respective triggers.


13 18. Based on the information in this affidavit, I believe there is probable cause that  
14 BROWN did knowingly possess a machinegun in violation of 18 U.S.C. § 922(o) and that he did  
15 knowingly possess an unregistered NFA firearm in violation of 26 U.S.C. § 5861(d).

16 19. I declare under penalty of perjury that the foregoing is true and correct to the best of my  
17 knowledge.

18 

19 \_\_\_\_\_  
20 Ryan Steger, Special Agent  
Federal Bureau of Investigation

21 This Affidavit was submitted to me by reliable electronic means and attested to me as true  
22 and accurate by telephone, consistent with the requirements of Fed. R. Crim. P. 4.1 on Sep 4, 2024.

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26 \_\_\_\_\_  
27 Hon. Stanley A. Boone  
UNITED STATES MAGISTRATE JUDGE

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Reviewed and approved as to form:

/s/ Robert Veneman-Hughes  
Assistant United States Attorney