

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
ALLAN ALPHONSO JAMES,
ALSO KNOWN AS "ALLAN JAMES", "MADE MANE
[REDACTED]
Defendant(s)
Case No.

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 July 12, 2017 in the county of in the
District of Columbia, the defendant(s) violated:

Code Section Offense Description
18 U.S.C. § 922(g)(1) Unlawful Possession of a Firearm

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT

[X] Continued on the attached sheet.

Complainant's signature

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/27/2017

Judge's signature

City and state: Washington, D.C.

US Magistrate Judge Robin M. Meriweather
Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF AN APPLICATION  
FOR CRIMINAL COMPLAINT FOR  
ALLAN ALPHONSO JAMES, ALSO  
KNOWN AS "ALLEN JAMES", and  
"MADE MANE YUSUF"

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Robert Mayo, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a criminal complaint charging Allan Alphonso James, also known as "Allen James" and "Made Mane Yusuf," with one count of unlawful possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2016. I am currently assigned to the FBI Washington Field Office ("WFO"). As part of my duties at the WFO, I am assigned to investigate various criminal matters in Washington, D.C. In preparation for this assignment, and as part of my continuing education, I have successfully completed various trainings, to include formal courses and training exercises. I have participated in all aspects of criminal investigations, including arrest operations, swearing out search warrants, conducting physical surveillance, telephone, email, and financial analysis obtained as a result of subpoenas, subject interviews, witness interviews, electronic surveillance, and operations of confidential human sources. I am a Special Agent with the FBI, within the meaning of 18 U.S.C. § 3052, and as such I am an officer of the United States who is authorized to investigate offenses against the United States and to execute warrants issued under the authority of the United States.

3. The facts in this affidavit are based on my personal observations, my training and experience, and information obtained from other law enforcement officers and agents. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

4. According to a Gerstein affidavit filed in the Superior Court for the District of Columbia, On July 12, 2017, at approximately 7:10 p.m., officers of the D.C. Metropolitan Police Department (“MPD”), operating in full uniform and in a marked scout car, observed a group of individuals standing in front of 2927 Martin Luther King Avenue S.E., Washington, D.C. The MPD officers noticed that an individual later identified as as Allan Alphonso James (hereinafter “JAMES”) became aware of the police presence, he suddenly walked away from the group towards Malcom X Avenue SE and walked into the park area between Malcom X Avenue S.E. and Parkland Place S.E. Officer Olivo observed JAMES adjust the front part of his waistband area and begin to walk around picnic tables to conceal himself from officers’ view.

5. Officer Olivo attempted to speak to JAMES and asked, “Hey, can I talk to you?” JAMES again readjusted his front waistband area before abruptly taking off in a full sprint away from the officers towards the alley alongside of 3012 Martin Luther King Avenue. Officers also ran toward 3012 Martin Luther King Avenue, S.E., and followed JAMES.

6. Officers Hiller and Robinson, who joined the chase in their scout car, drove into the alley behind the 700 block of Alabama Avenue S.E.—approximately a block and a half from where the chase started and a separate alley from the one along 3012 Martin Luther King Avenue—and observed JAMES jump over multiple fences, including a fence between 718 and 720 Alabama Avenue S.E. Officer Robinson observed JAMES jump this fence by using both hands, and he observed him run between 718 and 720 towards Alabama Avenue. The officers also pursued

JAMES towards Alabama Avenue, where they observed JAMES running with both hands swinging freely. JAMES was subsequently stopped in front of 731 Alabama Avenue S.E. Shortly thereafter, Officer Labun recovered a black in color firearm behind 718 Alabama Avenue S.E, which adjoins the aforementioned alley and is separated from it by a fence. The pistol appeared to be fully functional and is designed to expel a projectile by the action of an explosive.<sup>1</sup>

7. The firearm was brought to the District of Columbia Department of Forensic Sciences (“DFS”). Further examination revealed that it was a Glock 22, black in color .40 caliber with serial number WHW745.<sup>2</sup> The pistol was loaded with one round of ammunition in the chamber and a fifteen-round magazine containing fourteen rounds of ammunition.

8. Your affiant has spoken to, Officers Robinson and Hiller and confirmed the above version of events. Moreover, many of the officers, including Robinson and Hiller, were wearing MPD-issued body-worn camera during the event. Your affiant has reviewed that camera footage, which is consistent with the events described above.

9. DFS has moreover conducted a comparison of DNA swabs taken from the gun recovered on July 12, 2017, and a buccal swab recovered from JAMES on July 13, 2017. DFS concluded that there was “extremely strong support” that JAMES was included as a contributor to the DNA profiles recovered from the pistol and from the magazine. Specifically, as to the DNA profile recovered from the pistol, DFS found that it was a mixture with an assumed three contributors. The profile obtained from that mixture is 10.6 octillion times more likely if it originated from JAMES and two unknown, unrelated individuals than if it had originated from three unknown, unrelated individuals. DFS determined that the DNA profile recovered from the

---

<sup>1</sup> The facts in this paragraph come from both the Gerstein and your affiant’s conversation with MPD officers.

<sup>2</sup> Your affiant is also aware that MPD sought a search warrant for the JAMES’ DNA, and that the affidavit in support of that search warrant identified the recovered weapon as a .9mm

magazine was from a single source, and that profile was 23.1 octillion times more likely if it originated from JAMES than from an unknown, unrelated individual.

10. Both prior and subsequent to the July 12, 2017, incident described above, your affiant has sought and obtained search warrants for social media accounts believed to be associated with JAMES.

11. Your affiant has served three warrants on Facebook, Inc. for content associated with the Facebook username "Made Mane Yusuf" (hereinafter "JAMES' Facebook Account") That Facebook has a registered email address of allanj2845@gmail.com ("EMAIL 1"), and the search warrant returns yielded numerous photos of JAMES. According to U.S. Probation records, as recently as September 27, 2016, EMAIL 1 was listed as an email address for JAMES.

12. According to the Facebook search warrant returns, JAMES appears to engage in multiple conversations about the sale and purchase of firearms and firearms accessories. In one such message, JAMES' Facebook Account sent a message on December 26, 2016, stating, "[g]ot some extendos for glock 9 and 40s," a reference, in your affiant's training and experience, to high-capacity magazines for 9mm and .40 caliber pistols. On January 3, 2017, in another message to a different user, JAMES' Facebook Account sent a message stating, "[a]ye fool got some glock9 and 40 extendos."

13. A review of JAMES' social media accounts suggests that he acquired the gun recovered by MPD in the months leading up to the incident. That social media review includes, but is not limited to the following: On January 13, 2017, a Facebook user sent JAMES' Facebook Account a photograph of an apparent Glock 22 .40 caliber handgun. Approximately six hours later, JAMES' Facebook Account engaged in a Facebook Messenger conversation with the same user lasting 54 seconds. On January 20, 2017, one week after this exchange, JAMES' Facebook Account messaged another user and stated, "[y]ou got some 40 eggs," to which the other user

responded, [n]ope told you I need a re-up going today or tomorrow to Walmart in va.” Your affiant is aware, based on my training and experience, that “eggs” is often used to refer to ammunition.

14. The .40 caliber firearm depicted in the photograph sent to JAMES’ Facebook Account on January 13, 2017, is the same make, model, and color as the firearm recovered by MPD on July 12, 2017. Moreover, the firearm recovered by MPD has multiple distinctive features that appear to match the firearm in the photograph sent to JAMES’ Facebook Account. The first feature is a slide stop lever which shows a black mark in the upper left quadrant, toward the barrel of the firearm (DISTINCTIVE MARK 1). This slide stop lever is located on the side of the firearm slide opposite of where ammunition is ejected from. The second feature is a pin that appears to be rusted, located near the top of the trigger, on the same non-ejection side of the firearm. Other similarities between the two guns include a scratch on the slide and wear on the grip that can be seen in similar locations on the two photographs. A photograph of the gun recovered by MPD is attached hereto as Exhibit A, and the photograph sent to JAMES’ Facebook Account on January 13, 2017, is attached hereto as Exhibit B.

15. Your affiant has also served two search warrants on Snap, Inc., the parent company of Snapchat, in connection with Snapchat Account “bigyusuf\_nigga.” The registered email address associated with this Snapchat account is EMAIL 1, and the account contains multiple photographs of JAMES. The Snapchat warrant returns show a video of what appears to be JAMES in possession of a black Glock .40 caliber pistol tucked into his waistband. When the video is observed frame by frame, the pistol depicted appears to have DISTINCTIVE MARK 1 located on the firearms’ slide stop lever.<sup>3</sup> According to metadata associated with it, the video of JAMES with

---

<sup>3</sup> Due to the camera with which the video was captured, the video appears inverted, however DISTINCTIVE MARK 1 still exists on the slide stop lever, facing towards the barrel. A screen shot from that video is attached hereto as Exhibit C.

this pistol in his waistband was created on May 27, 2017. Additionally, according to geolocation information provided by Snapchat, it appears that this video was taken in Washington, D.C.

16. Your affiant is aware that according to court records and law-enforcement databases, prior to July 12, 2017, JAMES was convicted of one count of Robbery and one count of Attempted Robbery in D.C. Superior Court; and one count each of Taking of a Motor Vehicle and Armed Carjacking in Prince George's County, Maryland. Each of the above convictions is punishable by a term of incarceration in excess of one year.

17. Your affiant is moreover aware that the firearm recovered by the Metropolitan Police Department on July 12, 2017, is stamped "Made in Austria" and that Glock has no manufacturing facilities in the District of Columbia.

**CONCLUSION**

18. For the reasons stated above, there is probable cause to believe that JAMES violated 18 U.S.C. § 922(g)(1).

19. I declare under the penalty of perjury that the information provided above is true and correct to the best of my knowledge.

Respectfully submitted,

---

Robert Mayo  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on September 27, 2017.

---

THE HONORABLE ROBIN M. MERIWEATHER  
UNITED STATES MAGISTRATE JUDGE

**EXHIBIT A**



Asset: H7C99087  
Case: 17-119-615  
User: Penny  
Agency: MPD/HQ  
Date: 2017/07/14 17:58:53

**EXHIBIT B**



**EXHIBIT C**

