

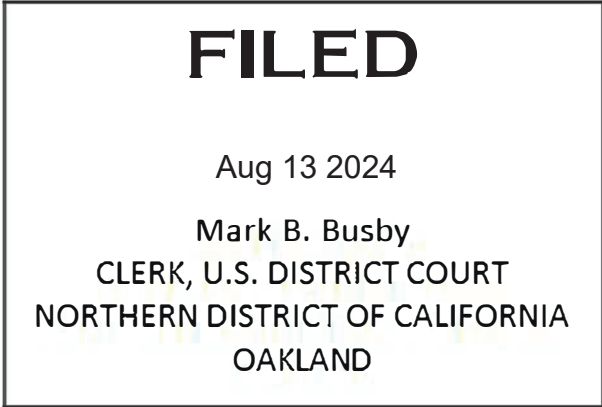
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United States Attorney

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9 Attorneys for United States of America



10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA, ) CASE NO. 4:24-mj-71208-MAG  
14 Plaintiff, )  
15 v. ) NOTICE OF PROCEEDINGS ON OUT-OF-  
16 ALEXANDER MCGRAIL REYNOLDS, ) DISTRICT CRIMINAL CHARGES PURSUANT TO  
17 Defendant. ) RULES 5(c)(2) AND (3) OF THE FEDERAL  
18 ) RULES OF CRIMINAL PROCEDURE

19 Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure  
20 that on August 13, 2024, the above-named defendant was arrested pursuant to an arrest warrant (copy  
21 attached) issued upon an

- 22  Indictment
- 23  Information
- 24  Criminal Complaint
- 25  Other (describe)

26 pending in the Southern District of New York, Case Number 24 mag 2910. In that case (copy of Arrest  
27 Warrant and Complaint), the defendant is charged with violating 18 U.S.C. § 922(a)(1)(A) (dealing  
28 firearms without a license) and 18 U.S.C. § 922(a)(5) (unlawful transfer, sale or delivery of a firearm to

1 a person in another state).

2 The maximum penalties for both offenses are: five (5) years imprisonment, a \$250,000 fine,  
3 three (3) years of supervised release, and forfeiture.

4 Respectfully Submitted,

5 ISMAIL J. RAMSEY  
6 United States Attorney

7 Date: August 12, 2024

*/s/ Thomas R. Green*  
THOMAS R. GREEN  
Assistant United States Attorney

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AO 442 (Rev. 11/11) Arrest Warrant

# UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

v.

Alexander McGrail Reynolds

)  
)  
)  
)  
)  
)

Case No. 24 mag 2910

*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) Alexander McGrail Reynolds,  
who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 922(a)(1)(A) -- Unlicensed Dealing of Firearms

Title 18, United States Code, Section 922(a)(5) -- Interstate Distribution of Firearms

Date: 08/09/2024

  
Issuing officer's signature

City and state: New York, NY

Hon. Jennifer E. Willis, USMJ  
Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
Arresting officer's signature

\_\_\_\_\_  
Printed name and title

AUSA: Andrew Jones

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

24 mag 2910

UNITED STATES OF AMERICA

**SEALED COMPLAINT**

v.

Violations of 18 U.S.C. § 922

ALEXANDER McGRAIL REYNOLDS,

COUNTY OF OFFENSE:  
BRONX

Defendant.

SOUTHERN DISTRICT OF NEW YORK, ss.:

Evan Moscou-Lewis, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and charges as follows:

**COUNT ONE**  
**(Unlicensed Dealing of Firearms)**

1. Between at least in or about November 2023, through at least in or about April 2024, in the Southern District of New York and elsewhere, ALEXANDER McGRAIL REYNOLDS, the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of importing, manufacturing, and dealing in firearms, and in the course of such business shipped, transported, and received a firearm in interstate and foreign commerce, to wit, REYNOLDS created handgun frames using a 3D printer which he then sold to customers by using e-commerce platform to make the sales.

(Title 18, United States Code, Section 922(a)(1)(A).)

**COUNTS TWO THROUGH TEN**  
**(Interstate Distribution of Firearms)**

2. On or about the dates listed below, in the Southern District of New York and elsewhere, ALEXANDER McGRAIL REYNOLDS, the defendant, not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly transferred, sold, traded, gave, transported, and delivered firearms to another person who was not a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms within the meaning of Chapter 44, Title 18, United States Code, knowing and having reasonable cause to believe that said person did not reside in the State in which REYNOLDS resided, to wit, on or about the dates described below, REYNOLDS resided in California and shipped the firearm frames described below from California to a customer REYNOLDS knew and had reason to believe was in the Bronx, New York.

<u>Count</u>	<u>Approximate Date</u>	<u>Description</u>
Two	November 17, 2023	Two Glock-style handgun frames
Three	December 7, 2023	Three Glock-style handgun frames
Four	December 18, 2023	One Glock-style handgun frames
Five	January 9, 2024	Four Glock-style handgun frames
Six	February 2, 2024	Five Glock-style handgun frames
Seven	February 7, 2024	Seven Glock-style handgun frames
Eight	February 26, 2024	Four Glock-style handgun frames
Nine	March 12, 2024	Four Glock-style handgun frames
Ten	April 3, 2024	Five Glock-style handgun frames

(Title 18, United States Code, Section 922(a)(5).)

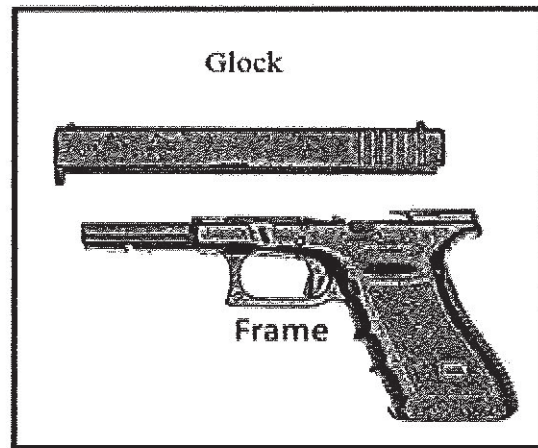
The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the ATF and am assigned to the New York Field Division of the ATF. I have been personally involved in this investigation. This affidavit is based on my investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

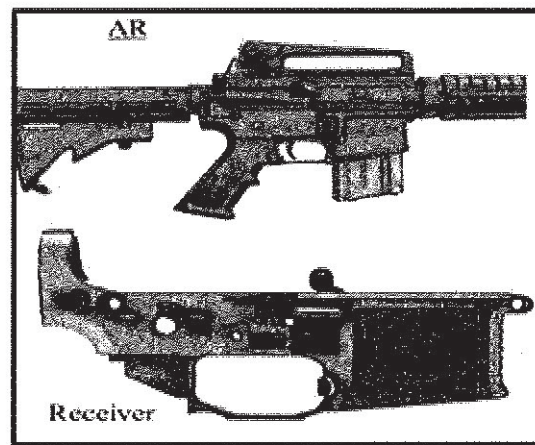
#### Background on Ghost Guns

4. As defined by federal statute, the term “firearm,” as is relevant for the charges in this Complaint, includes “any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive . . . [or] the **frame** or **receiver** of any such weapon.” 18 U.S.C. § 921(a)(3)(A)-(B) (emphases added).

5. As defined by federal regulation, a “frame” is “the part of a handgun, or variants thereof, that provides housing or a structure for the primary energized component designed to hold back the hammer, striker, bolt, or similar component prior to initiation of the firing sequence (*i.e.*, sear or equivalent), even if pins or other attachments are required to connect such component to the housing or structure.” 27 C.F.R. § 478.12(a)(1). The image below is taken from the same federal regulation that defines a “frame” and shows the frame of a Glock-style firearm.



6. As defined by federal regulation, a “receiver” is “the part of a rifle, shotgun, or projectile weapon other than a handgun, or variants thereof, that provides housing or a structure for the primary component designed to block or seal the breech prior to initiation of the firing sequence (*i.e.*, bolt, breechblock, or equivalent), even if pins or other attachments are required to connect such component to the housing or structure.” 27 C.F.R. § 478.12(a)(2). The image below is taken from the same federal regulation that defines a “receiver” and shows the the receiver of an AR-15-style rifle.



7. The colloquial term “ghost gun” refers to a firearm that lacks a serial number and that is manufactured by someone other than a licensed manufacturer of firearms. In federal regulations, these firearms are referred to as “privately made firearms.” Federal regulations define a “privately made firearm” as a “firearm, **including a frame or receiver**, completed, assembled, or otherwise produced by a person other than a licensed manufacturer, and without a serial number placed by a licensed manufacturer at the time the firearm was produced.” 27 C.F.R. § 478.11 (emphasis added).

#### Overview of the Investigation

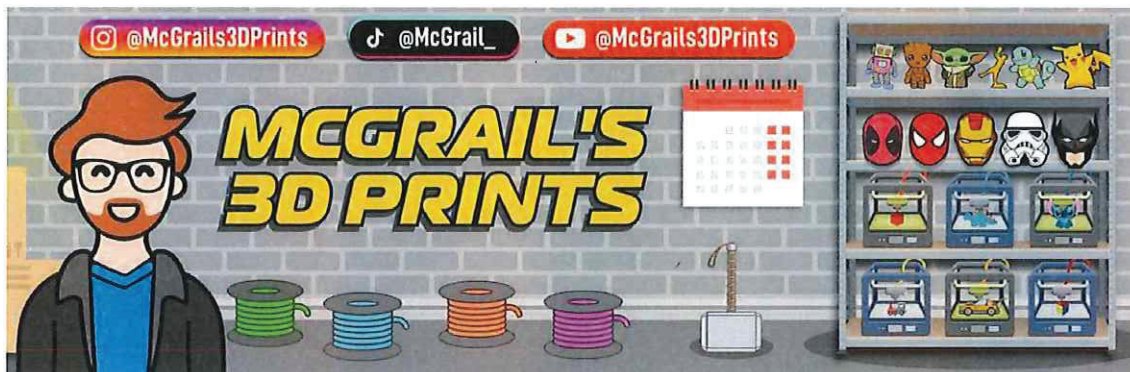
8. As described more below, ALEXANDER McGRAIL REYNOLDS, the defendant, operates a 3D printing shop on the e-commerce site Etsy that REYNOLDS uses to sell, among other items, 3D-printed handgun frames. REYNOLDS manufactures the frames in California and

then ships the frames to his customers, including to customers in New York City. REYNOLDS falsely advertises these frames as being for “Airsoft” guns, *i.e.*, replica firearms that shoot only small pellets, but in fact, the frames REYNOLDS is selling are designed to be converted into fully functioning firearms. During the investigation, law enforcement agents acting in an undercover capacity have purchased dozens of frames from REYNOLDS. In addition to selling handgun frames to law enforcement agents, REYNOLDS has also shipped handgun frames to others, including to at least one customer in New York City.

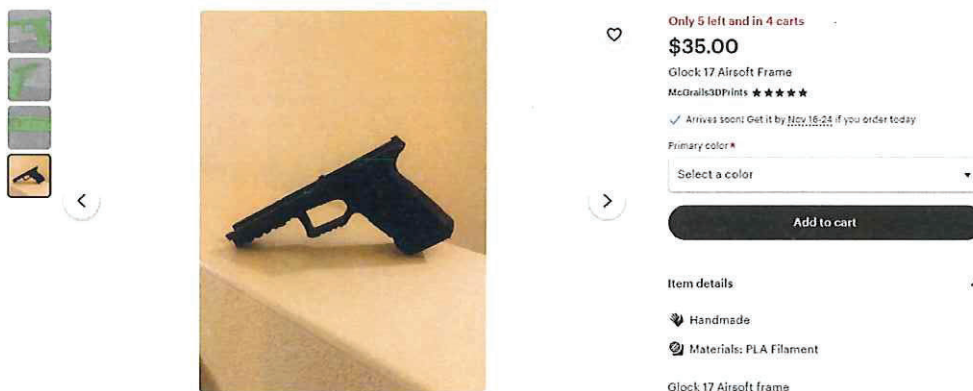
The Reynolds Etsy Shop

9. Based on, among other sources, my discussions with other law enforcement officers, my review of law enforcement reports, and my own observations, I have learned, among other things, the following, about ALEXANDER McGRAIL REYNOLDS, the defendant, making online sales of handgun frames.

a. In or about November 2023, law enforcement officers identified an Etsy shop with the name “McGrail’s 3D Prints” (the “Reynolds Etsy Shop”) as advertising for sale an item that appeared to be a frame for a Glock-style handgun. The item was described in the listing as for a “Glock 17 Airsoft Frame.” Below are two images from the Reynolds Etsy Shop. The first is a banner image for the shop that displays at the top of the website. The second is a copy of the advertisement from November 2023 for the “Glock 17 Airsoft Frame.”



*The Reynolds Etsy Shop Banner*



*A Handgun Frame Listed for Sale*

b. After identifying what appeared to be a handgun frame for sale by the Reynolds Etsy Shop, on or about November 14, 2023, ATF agents in New York purchased two of the advertised frames from the Reynolds Etsy Shop. On or about November 17, 2023, the frames were delivered by the United States Post Office to the Bronx, New York. The return address on the shipment described that the shipment came from “McGrail Reynolds” at a particular address in Concord, California (the “Reynolds Shipping Address”).

c. After being received by the ATF, the frames were submitted to the ATF Firearms & Ammunition Technology Division for analysis. In a report issued in March 2024, an ATF Firearms Enforcement Officer determined that both items that were purchased from the Reynolds Etsy Shop and received in the Bronx on or about November 17, 2023 were “Glock-type” privately made firearms that appeared to be made by 3D printing and were “designed to use aftermarket rails and compatible Glock-type components.” The officer concluded that each item was “the frame of a weapon designed to expel a projectile by the action of an explosive,” making each item a firearm, as defined in 18 U.S.C. § 921(a)(3)(B). The two images below show the handgun frames that were purchased from the Reynolds Etsy Shop in or about November 2023.



d. After purchasing the two handgun frames described above from the Reynolds Etsy Shop, law enforcement agents purchased additional frames from the Reynolds Etsy Shop. Each frame that was purchased had a similar appearance to the frames described above, including the presence of holes required to install gun parts into the frames. Also like the initial order described above, each subsequent order was shipped to the Bronx, and each was shipped with a return address of “McGrail Reynolds” at the Reynolds Shipping Address. In total, as described in the chart below, law enforcement agents purchased approximately 35 handgun frames from the Reynolds Etsy Shop that were shipped to the Bronx.


<u>Date Ordered</u>	<u>Date Received</u>	<u>Description</u>
11/14/23	11/17/23	Two Glock-style handgun frames
12/01/23	12/07/23	Three Glock-style handgun frames
12/11/23	12/18/23	One Glock-style handgun frames

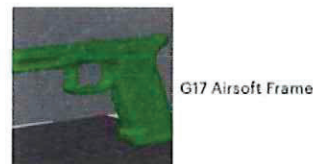


<u>Date Ordered</u>	<u>Date Received</u>	<u>Description</u>
12/28/23	01/09/24	Four Glock-style handgun frames
01/11/24	02/02/24	Five Glock-style handgun frames
01/30/24	02/07/24	Seven Glock-style handgun frames
02/14/24	02/26/24	Four Glock-style handgun frames
02/28/24	03/12/24	Four Glock-style handgun frames
03/21/24	04/03/24	Five Glock-style handgun frames

e. Public reviews left online for the Reynolds Etsy Shop show that many of the shop’s customers purchased handgun frames and left reviews of the frames online. The images below show reviews left for the Reynolds Etsy Shop. The first is dated February 28, 2024. In the review, a customer included a photograph of what appears to be a 3D-printed frame that has had gun parts added to it. Also shown with the frame is a 17-round Glock 9mm handgun magazine. The customer describes in the review that “These frames are perfectly in spec.



 Jason Feb 28, 2024  
 ★★★★★  
 These frames are perfectly in spec. I've r  
 I will continue to do so.



f. A second public review that was posted on or about February 14, 2024, shows what appears to be a 3D-printed frame that has been built into a functioning firearm. The reviewer notes the frame is “solid work and interchangeable with airsoft and actual g\_n parts.”



 Raxhad Feb 14, 2024

★★★★★  
Great job this frame is good and solid work and interchangeable with  
airsoft and actual g\_m parts



Rubika Cube Stand 3D print

g. During the investigation of the Reynolds Etsy Shop, while posing as a purchaser of handgun frames, I communicated with the Reynolds Etsy Shop operator via a chat feature on Etsy. In a chat conversation that happened on or about February 28, 2024, I told the operator of the Reynolds Etsy Shop that I was satisfied with the “PY2A” style frames that had been purchased from the Reynolds Etsy Shop but was “looking for something FMDA style.” The operator of the Reynolds Etsy Shop responded that he had FMDA “for gen 3” and would ship “all 4 fmda 19 gen 3,” in an upcoming shipment. Based on my training and experience investigating ghost guns, I know that “PY2A” is an acronym for “Print Your Second Amendment” and “FMDA” is an acronym for “Free Men Don’t Ask.” PY2A and FMDA refer to two different designs of 3D-printed, Glock-style ghost guns, not replica firearms, such as Airsoft guns. From this same experience, I further know that “19 gen 3” refers to a Glock 19 Gen3, 9mm handgun.

10. As described more below, ALEXANDER McGRAIL REYNOLDS, the defendant has been identified as the operator of the Reynolds Etsy Shop. From reviewing ATF records, I know that REYNOLDS is not a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms.

a. As noted above, each of the purchases of handgun frames from the Reynolds Etsy Shop has been shipped with a return address that lists “McGrail Reynolds” as the sender and gives the same return address as the Reynolds Shipping Address in Concord, California. I have reviewed pictures taken in June 2024 during surveillance of the residence at the Reynolds Shipping Address, which showed a man in front of the residence. I believe, based on comparing the person shown in the surveillance images to a known image of REYNOLDS maintained by the State of California, that REYNOLDS is the person seen in surveillance images at the Reynolds Shipping Address.

b. As described above, on or about March 12, 2024, four Glock-style frames that were purchased from the Reynolds Etsy Shop were received in the Bronx. The package for those frames, like for all others, listed “McGrail Reynolds” and the Reynolds Shipping Address as the sender. Beneath the shipping label used to send the frames to the Bronx was another shipping label, which indicated that the same box had been shipped to “McGrail Reynolds” at the Reynolds Shipping Address, on or about February 23, 2024.

c. As depicted above, the Reynolds Etsy Shop has a banner image which includes an account name for a TikTok account (the “Reynolds TikTok Account”), and other social

media accounts. From reviewing some of the publicly posted materials on the Reynolds TikTok Account, I recognize REYNOLDS in videos posted to the account, based on a comparison of the videos to a known image of REYNOLDS maintained by the State of California. Further, based on my comparison of online real estate listing photos for the Reynolds Shipping Address to videos in the Reynolds TikTok account, I believe that REYNOLDS has made videos on the back patio of Reynolds Shipping Address that he has then posted to the Reynolds TikTok Account.

Additional Recovery of Firearms Purchased from the Reynolds Etsy Shop

11. From discussing the incident with members of a New York City Police Department team that is charged with investigating the proliferation of ghost guns in New York City, I know that on or about January 25, 2024, during the execution of a search warrant in Staten Island, those officers recovered three functioning Glock-style ghost guns with 3D printed frames, which appeared like those frames purchased from the Reynolds Etsy Shop. The officers also found during the execution of the search warrant shipping materials showing that "McGrail Reynolds" at the Reynolds Shipping Address in California had sent a package to the Staten Island residence on or about December 27, 2023.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ALEXANDER McGRAIL REYNOLDS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



EVAN MOSCOU-LEWIS

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me this 9<sup>th</sup> day of August, 2024.



THE HONORABLE JENNIFER E. WILLIS

United States Magistrate Judge

Southern District of New York