


COG/LJW: USAO#2021R00036

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

<p>UNITED STATES OF AMERICA</p> <p>v.</p> <p>WILLIAM R. JOHNSON, JR.,</p> <p>Defendant</p>	<p>Criminal No. <u>RDB 21cr 427</u></p> <p>(Honest Services Wire Fraud, 18 U.S.C. §§ 1343, 1346; Forfeiture, 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), 28 U.S.C. § 2461(c))</p>
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U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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INDICTMENT

The Grand Jury for the District of Maryland charges that at all times relevant to this indictment:

Introduction

1. WILLIAM RANDALL JOHNSON, JR. ("JOHNSON") was a resident of Middle River, Maryland.

A. The Baltimore County Police Department

2. The Baltimore County Police Department (BCoPD) was the nation's 21st largest police department. With more than 1,900 sworn officers, BCoPD served Baltimore County, which is comprised of 612 square miles, including urban, suburban and rural areas. Baltimore County surrounds the City of Baltimore, a separate geopolitical jurisdiction.

3. BCoPD's mission was enforcement of the laws and ordinances of Maryland and Baltimore County; the protection of life and property; the prevention and detection of crime; preservation of the peace; and protection of the rights of all citizens. BCoPD's motto is "Integrity...Fairness...Service."

4. JOHNSON joined the BCoPD on August 18, 2008. JOHNSON became a narcotics detective on February 18, 2014.

B. The Maryland State Police

5. The Maryland Department of State Police (hereafter “Maryland State Police” or “MSP” was a law enforcement agency of the State of Maryland whose sworn and civilian employees provide police services throughout the State of Maryland. The MSP’s Licensing Division administered the provisions of the Annotated Code of Maryland and Code of Maryland Regulations provisions related to: the licensing and registration of firearms; handgun permits; security guards and agencies and other licensing functions as defined by statute or regulation.

C. Qualified Handgun Instructors

6. In Maryland, a person may be certified as a qualified handgun instructor by the Maryland Police and Correctional Training Commissions or a nationally recognized firearms organization.

7. On April 29, 2019, JOHNSON obtained a qualified handgun instructor certificate (“QHIC”) from the Maryland State Police.

8. JOHNSON’s QHIC expires on April 29, 2023. JOHNSON’s unique QHIC number is 2019-0099.

9. Since April 29, 2019, JOHNSON has certified at least 100 applicants for handgun qualification licenses and at least 45 for wear and carry permits.

D. Maryland Handgun Qualifying Licenses

10. In the State of Maryland, a resident may not purchase, rent, or receive a handgun after October 1, 2013, unless they possess a handgun qualification license (“HQL”) issued by the Maryland State Police.

11. To obtain an HQL, the applicant must be a Maryland resident, at least 21 years old, and must complete 4 hours of instruction¹ by a qualified handgun instructor. The classroom instruction is on state firearm law, home firearm safety, handgun mechanisms and operation, and a firearms orientation in which the applicant must demonstrate the safe operation and handling of a firearm. The orientation component that demonstrates a person's safe operation and handling of a firearm includes a "live fire" exercise in which the applicant safely shoots the weapon.

E. Wear and Carry Permits (CCWs)

12. In the State of Maryland, an adult may obtain a license to wear and carry a firearm (referred to as a wear and carry permit or "CCW") if they meet certain criteria, among them that the applicant has successfully completed the Maryland State Police approved firearms training course within 2 years prior to submitting the original or renewal application. For an initial CCW application, the applicant must undergo a minimum of 16 hours of instruction by a qualified handgun instructor. For a renewal CCW application, an applicant must undergo a minimum of 8 hours of instruction by a qualified handgun instructor.

13. Part of the training course for obtaining a CCW was a firearms qualification exercise in which the applicant must demonstrate their proficiency and use of the firearm. Designated security personnel (security guards, private detectives, special police, and armored car drivers/guards) must shoot a practical police course of at least 50 rounds, from no further than 25

¹ There are exemptions from the training requirement for a person who has completed a certified firearms training course approved by the Secretary of State Police, has completed a course of instruction in competency and safety in the handling of firearms prescribed by the Department of Natural Resources, is a qualified handgun instructor, is an honorably discharged member of the armed forces of the United States or the National Guard, is an employee of an armored car company and has a separate permit, and/or lawfully owns a regulated firearm. MD Code Public Safety, § 5-117.1

yards and score at least 70 percent accuracy. All other applicants must shoot a course of at least 25 rounds, from no further than 15 yards and score at least 70 percent accuracy.

14. Once an applicant has shown that they are eligible to obtain a CCW, has supporting documentation to support a good and substantial reason for the CCW, and has completed the requisite training, the MSP may then issue a CCW.

The Scheme to Defraud

15. From in and around May 2019 through in and around September 2021, in the District of Maryland, the Defendant

WILLIAM RANDALL JOHNSON, JR.

did knowingly devise and intend to devise a scheme and artifice to defraud the State of Maryland of the intangible right to the honest services of JOHNSON through bribery, kickbacks and the concealment of material information, by means of materially false and fraudulent pretenses and representations, (hereafter “Scheme and Artifice to Defraud”).

The Purpose of the Scheme and Artifice to Defraud

16. The purpose of the Scheme and Artifice to Defraud was for **JOHNSON** to use his position as qualified handgun instructor to improperly enrich himself by falsely certifying that applicants had completed the requisite training to obtain a handgun qualification license (HQL) and/or a wear and carry permit (CCW) for a handgun.

Manner and Means of the Scheme to Defraud

17. JOHNSON solicited and accepted bribes and kickbacks, paid through interstate electronic funds transfer services like Venmo, CashApp and Zelle, from applicants seeking handgun qualification licenses (HQLs) and wear and carry (CCWs) permits in exchange for falsely

certifying to the Maryland State Police that the applicant had completed the training required by law.

A. December 2019 HQL for M.M.

18. On December 21, 2019, M.M. applied for an HQL with the Maryland State Police. As a part of that application he submitted a National Rifle Association of America certificate, in which JOHNSON falsely certified the following:

- a. That M.M. successfully completed the “Basics of Pistol Shooting”
- b. That the firearm used was “Semi-Automatic Only”
- c. That the training was completed on December 21, 2019

JOHNSON’s name is printed at the bottom of the certificate with Instructor I.D. number 252533054.

B. April 2021 CCW for M.M.

19. On December 9, 2020, M.M. contacted JOHNSON using Facebook Messenger and the following conversation ensued:

M.M.: Bro I’m ready for ccw what do I have to do

JOHNSON: **\$150 and that’s about it lmao. I send you the sheet you need and[sic] then you just gotta get prints and apply. Your prints might still be good if you still have the tracking number from the ones for your HQL.**

(emphasis added).

20. Later, on April 15, 2021, M.M. again contacted JOHNSON using Facebook Messenger and notified him that he was ready to complete the transaction:

M.M.: Bro I’m ready for ccw what do I have to do

M.M.: Oh okay I’m gonna get you the money over today same cash app right?

JOHNSON: Yes sir

21. Two days later, on April 17, 2021, JOHNSON reached out to M.M. using Facebook

Messenger:

JOHNSON: You still want that sign off I'm about to do a couple

M.M.: Yeah sending you money right now

M.M.: Just sent it bro

JOHNSON: Alright I'm in canton right now I'll take care of it when I get back

21. On April 17, 2021, M.M. paid JOHNSON \$150.00 using CashApp.

22. An initial application for a CCW, dated April 19, 2021, was submitted by M.M. to the Maryland State Police.

23. As a part of that application, M.M. submitted a "Certified Qualification Score Sheet," dated April 19, 2021, which falsely certified the following:

- a. That M.M. received a minimum of sixteen hours of classroom training and qualified on the range with a "Glock 19-9mm" revolver/semi-automatic handgun.
- b. That M.M. completed a Basic Practical Handgun Course and scored 100 percent at a "Private-Maryland" range.

24. The "Certified Qualification Score Sheet" for M.M. was certified by JOHNSON as a "Qualified Handgun Instructor," QHIC# 2019-0099.

25. M.M. did not attend 16 hours of training to receive his CCW.

26. In June of 2021, M.M. received a Maryland CCW from Maryland State Police.

C. September 2020 Wear Carry Permit for K.B.

27. On September 24, 2020, "K.B." messaged JOHNSON using Facebook Messenger and inquired about a Maryland CCW. JOHNSON asked K.B. if he knew how to shoot and K.B. replied that he had been shooting since he was "little." JOHNSON then told K.B., "I can sign off on your training for you **so you don't have to do the course and shit. You can just give me**

\$200. Once I sign off I give you a sheet and then you have to apply for the CCW through Maryland state police. You gotta have the justifications to why you need it obviously.” (emphasis added).

28. On September 25, 2020, K.B. messaged JOHNSON on Facebook and stated, “Hey bro I got a few questions.” JOHNSON responded, “Can you type me them im **in my office can’t talk too open.**” (emphasis added).

29. On September 24, 2020, K.B. paid JOHNSON \$200.00 using Zelle®.

30. An initial application for an CCW, dated January 2, 2021, was submitted by K.B. to the Maryland State Police.

31. As a part of that application, K.B. submitted a “Certified Qualification Score Sheet,” dated September 24, 2020, which falsely certified the following:

- a. That K.B. received a minimum of sixteen hours of classroom training and qualified on the range with a “Glock 19” revolver/semi-automatic handgun.
- b. That K.B. completed a Basic Practical Handgun Course and scored 100 percent at a “Private” range.

32. The “Certified Qualification Score Sheet” for K.B. was certified by JOHNSON as a “Qualified Handgun Instructor,” QHIC# 2019-0099.

33. K.B. did not attend 16 hours of training to receive his CCW.

34. In April of 2021, K.B. received a Maryland CCW from Maryland State Police.

D. January 2021 Wear and Carry Permit for B.C.

35. On January 29, 2021, “B.C.” messaged JOHNSON using Facebook messenger about obtaining a CCW. The following conversation occurred between JOHNSON and B.C.:

B.C.: Hey man I signed up for that Ccw class feb 27. But what about this sign off thing you talk about **Do I still need to take the class?** Lol

JOHNSON: **Fuck that course lol** Yeah I charge \$150 and sign it off for you and then you get printed and apply. Let me know. **Better then sitting through 16 hours**

B.C.: Jesus that's so much easier. Can my wife get her hql that way as well?

JOHNSON: **Yeah I do \$100 for HQL and \$150 for CCW. That gets her the certificate of training and you the shooting sheet and training sign off.** Then you both get printed and apply. I'll send you the link for HQL and the CCW link when I send the certificates

(emphasis added).

36. On February 4, 2021 JOHNSON provided his Venmo account to "B.C." "B.C." replied with the following:

B.C.: Okay I'll Venmo you mine now and ill see if the Wife wants to do hers

JOHNSON: Sounds good when I get home I'll send you over the sheet

37. On February 5, 2021 "B.C." messaged JOHNSON the following:

B.C.: Oh if my father wants one as well can he get one? **You don't have to worry about me telling anyone either.**

JOHNSON: Of course Just let me know I have to do another two tomorrow.

(emphasis added).

38. On February 4, 2021, B.C. paid JOHNSON \$150.00 using Venmo.

39. An initial application for a CCW, dated March 8, 2021 was submitted by B.C. to the Maryland State Police.

40. As a part of that application, B.C. submitted a "Certified Qualification Score Sheet," dated February 6, 2021, which falsely certified the following:

- a. That B.C. received a minimum of sixteen hours of classroom training and qualified on the range with a "Glock 19-9mm" revolver/semi-automatic handgun.
- b. That B.C. completed a Basic Practical Handgun Course and scored 100 percent at a "Private-Maryland" range.

41. The "Certified Qualification Score Sheet" for B.C. was certified by JOHNSON as

a “Qualified Handgun Instructor,” QHIC# 2019-0099.

42. B.C. did not attend 16 hours of training to receive his CCW.

43. In May of 2021, B.C received a Maryland CCW from the Maryland State Police.

E. January 2021 Wear and Carry Permit for G.G.

44. On January 30, 2021 a subject identified on Facebook as “G.G.” had the following message conversation with JOHNSON:

G.G.: Are ya able to sign off with no class yet

JOHNSON: Lol Utah? I wish. CCW for here yes

G.G.: Hql?

JOHNSON: And HQL Yes

G.G.: Shit sign me up lol. **I don’t have time to take damn class lol**

JOHNSON: HQL or CCW or both

G.G.: Both or at least hql

JOHNSON: Whatever you want broski. Venmo me lol you want both I’ll do \$200 if you want HQL it’s \$100 and then I do \$200 for CCW sign off. **No classes Fuck classes lol**

(emphasis added).

45. On February 5, 2021, G.G. paid JOHNSON \$200.00 using Venmo.

46. An initial application for a CCW, dated February 28, 2021, was submitted by G.G. to the Maryland State Police.

47. As a part of that application, G.G. submitted a “Certified Qualification Score Sheet,” dated February 6, 2021, which falsely certified the following:

- a. That G.G. received a minimum of sixteen hours of classroom training and qualified on the range with a Glock 19-9mm revolver/semi-automatic handgun.
- b. That G.G. completed a Basic Practical Handgun Course and scored 100 percent at

a "Private-Maryland" range.

48. The "Certified Qualification Score Sheet" for G.G. was certified by JOHNSON as a "Qualified Handgun Instructor," QHIC# 2019-0099.

49. G.G. did not attend 16 hours of training to receive his wear and carry permit.

50. In April of 2021, G.G. received a Maryland CCW from Maryland State Police.

F. January 2021 Handgun License and Wear and Carry Permit for S.B.

51. On January 6, 2021, S.B. contacted JOHNSON using Facebook Messenger and told him that she wanted to get a handgun wear and carry permit. The following conversation ensued between the two:

JOHNSON: Do you know how to shoot?

S.B.: Yes, I was raised on a farm ;)

JOHNSON: Lmao I'll sign off on your HQL and CCW for \$250. **You won't have to go to training** it'll be the certificates that you upload during the application process

S.B.: That's a deal. So what do I need to do?

JOHNSON: Venmo me \$250 and send me an email address lol and I'll send you what you need

S.B.: Ok and this is 100% **official**

JOHNSON: **Yeah you'll be like the 50th person I've done HQLs for this year and like 15 CCW lol**

JOHNSON: **If anyone asks just tell them you went to a class and boom**

(emphasis added).

52. On January 6, 2021, S.B. paid JOHNSON \$250.00 using Venmo.

53. An initial application for a CCW, dated February 1, 2021, was submitted by S.B. to the Maryland State Police.

54. As a part of that application, S.B. submitted a “Certified Qualification Score Sheet,” dated January 7, 2021, which falsely certified the following:

- a. That S.B. received a minimum of sixteen hours of classroom training and qualified on the range with a “Glock 19-9mm” revolver/semi-automatic handgun.
- b. That S.B. completed a Basic Practical Handgun Course and scored 100 percent at a “Private-Maryland” range.

55. The “Certified Qualification Score Sheet” for S.B. was certified by JOHNSON as a “Qualified Handgun Instructor,” QHIC# 2019-0099.

56. S.B. did not attend 16 hours of training to receive her wear and carry permit.

57. In April of 2021, S.B. received a Maryland CCW from Maryland State Police.

THE CHARGES

58. On or about the dates set forth below, in the District of Maryland and elsewhere, the defendant

WILLIAM RANDALL JOHNSON, JR.

for the purpose of executing the Scheme and Artifice to Defraud and attempting to do so, did transmit and cause to be transmitted by means of wire communication in interstate commerce writings, signs, signals, and sounds, namely:

Count	Interstate Transmission	Description of Interstate Transmission
1	12/21/2019	CashApp payment from M.M. to JOHNSON in Maryland in the total amount of \$80.00
2	9/24/2020	Zelle® payment from K.B. to JOHNSON in Maryland in the total amount of \$200.00

3	1/6/2021	Venmo payment from S.B. to JOHNSON in Maryland in the total amount of \$250.00
4	2/5/2021	Venmo payment from B.C. to JOHNSON in Maryland in the amount of \$150.00
5	2/4/2021	Venmo payment from G.G. to JOHNSON in Maryland in the amount of \$200.00
6	4/17/2021	CashApp payment from M.M. to JOHNSON in Maryland in the total amount of \$150.00

18 U.S.C. § 1343 and 1346.

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under any of the offenses charged in Counts One through Six of this Indictment.
2. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any of the offenses alleged in Counts One through Six of this Indictment, the defendant,

WILLIAM RANDALL JOHNSON, JR.

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)


EREK L. BARRON
UNITED STATES ATTORNEY

A TRUE BILL:

10/26/2021
Date

SIGNATURE REDACTED

Forfeiture 