

FTB:EMR/EWS  
F. #2023R00683

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

LEON WILSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES G. DOBIS, being duly sworn, deposes and states that he is a Special Agent with the Department of Justice, Office of the Inspector General (“DOJ-OIG”), duly appointed according to law and acting as such.

On or about September 4, 2023, within the Eastern District of New York and elsewhere, the defendant LEON WILSON, while acting under color of law as a Bureau of Prisons (“BOP”) correctional officer, willfully deprived John Doe, an individual whose identity is known to the deponent, of the right, secured by the Constitution and laws of the United States, to be free from an unreasonable seizure, which includes the right to be free from a law enforcement officer using unreasonable force, by shooting John Doe when there was no lawful justification to use deadly force. The offense involved the use of a dangerous weapon and resulted in bodily injury.

(Title 18, United States Code, Section 242)

**TO BE FILED UNDER SEAL**

**COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF ARREST WARRANT**

(18 U.S.C. § 242)

Case No. 24 MJ 553

Magistrate Judge Sanket Bulsara

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the DOJ-OIG and have been involved in the investigation of numerous cases involving firearms. I began my career as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") in 2013. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and reports of other law enforcement officers involved in the investigation. Based on my conversations with other law enforcement officers and others; my review of law enforcement records and information provided by others; and my review of open-source information, I have learned the following, in substance and in part.

2. The defendant LEON WILSON was a correctional officer at Metropolitan Detention Center-Brooklyn ("MDC-Brooklyn"), a federal detention facility located in Sunset Park, Brooklyn. He has been employed by the BOP since 2000.

3. On or about September 4, 2023, the defendant LEON WILSON was on duty at MDC-Brooklyn between the hours of 12 AM to 12 PM and assigned to monitor the facility's outer perimeter. WILSON's posting permitted him to carry an MDC-Brooklyn-issued firearm while on duty at his assigned station.

4. At approximately 4:30 AM, the defendant LEON WILSON temporarily abandoned his posting while driving a BOP-issued white Dodge Caravan bearing U.S. government license plate numbers 70029NYM (the "White BOP Van") and traveled to a nearby

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

subway station, where he purchased a MetroCard, as reflected in WILSON's financial records. Multiple surveillance cameras captured WILSON driving to and from the subway station.

5. Following his purchase of the MetroCard, the defendant LEON WILSON returned to MDC-Brooklyn driving the White BOP Van at approximately 4:42 AM. Upon his arrival, a gray BMW sedan with tinted windows (the "BMW") drove into the MDC-Brooklyn staff parking lot. WILSON parked the White BOP Van across the street from the staff parking lot where he could observe the BMW. As captured by multiple surveillance cameras, both cars idled in their respective parking spots for approximately three minutes. At approximately 4:45 AM, WILSON drove the White BOP Van into the MDC-Brooklyn staff parking lot and positioned his vehicle directly in front of the BMW, which then sped away off MDC-Brooklyn property. WILSON gave chase in the White BOP Van and pursued the BMW to a location near the Brooklyn Bridge, approximately five miles from MDC-Brooklyn's property line.


6. During the car chase, the defendant LEON WILSON at times exceeded the posted speed limit and ran traffic lights, narrowly avoiding other motorists on the road. For instance, a license plate reader positioned in the vicinity of Third Avenue and 27<sup>th</sup> Street in Brooklyn, New York, captured the White BOP Van driving 55 miles per hour in a 25 mile per hour zone. WILSON later sped past an individual driving an electronic bicycle. Moments later, WILSON ran a red traffic light just as he changed lanes to avoid colliding with other cars stopped at the intersection.

7. At approximately 4:47 AM, in the vicinity of 498 Hamilton Avenue, Brooklyn, New York, the defendant LEON WILSON fired three gunshots towards the BMW, striking the vehicle and one of its occupants, John Doe, and causing bodily injury to John Doe.

8. At approximately 5:00 AM, the defendant LEON WILSON returned to MDC-Brooklyn driving the White BOP Van. He did not report that he discharged his firearm in the line of duty, in violation of BOP and MDC-Brooklyn-specific policies and procedures.

9. Law enforcement officers subsequently recovered the BMW and observed that it had three gunshot holes in the rear exterior of the vehicle.

WHEREFORE, your deponent respectfully requests that the defendant LEON WILSON be dealt with according to law.



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JAMES G. DOBIS  
Special Agent  
United States Department of Justice  
Office of the Inspector General

Sworn to before me this VIA TELEPHONE  
26th day of September, 2024



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THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK