

**AFFIDAVIT**

I, Hans C. Wiedenhofer, a Special Agent (“SA”), of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, being duly sworn under oath, hereby depose and state:

1. I am a law enforcement officer of the United States, and under 18 U.S.C. § 3051, I am charged by the Attorney General with the duty of enforcing any of the criminal, seizure, or forfeiture provisions of the laws of the United States, may carry firearms, serve warrants and subpoenas issued under the authority of the United States, make arrests without warrant for any offense against the United States committed in my presence, or for any felony under the laws of the United States if there are reasonable grounds to believe that the person to be arrested has committed or is committing such felony.

2. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), United States Department of Justice (DOJ), and as such am empowered under Title 18, United States Code § 2510(7), to enforce Title 18 and other criminal laws of the United States.

3. I have been employed by the ATF since May 2017. I am presently assigned to ATF’s Cleveland Field Office. I am a graduate of the ATF National Academy, located at the Federal Law Enforcement Training Center in Glynco, Georgia. The ATF National Academy consists of 16 weeks of training regarding subjects such as firearms trafficking, unlawful possession of firearms and ammunition, unlawful dealing in firearms, unlawful possession and/or use of explosives, improvised explosive devices, arson investigations, execution of arrest and search warrants, and criminal procedure. In conducting investigations, I have utilized a variety of investigative techniques and resources, including but not limited to surveillance, confidential

informants, controlled purchases, electronic surveillance, exploitation of telephone and social media data, interviews, and the review of financial documents.

4. I have received specialized training regarding the investigation and enforcement of Federal Firearms violations and have conducted investigations regarding individuals involved in dealing firearms without a license and manufacturing firearms without a license.

5. I am submitting this affidavit in support of a Criminal Complaint and an Application for an Arrest Warrant pursuant to Rules 3 and 4 of the Federal Rules of Criminal Procedure and 18 U.S.C. 3051, authorizing the arrest of GEORGE MANUSELIS aka GEORGE MANOUSELIS, DOB: 01/\*\*/1946.

6. The facts contained in this Affidavit are based upon my personal knowledge of the investigation, in addition to my general knowledge, training, and experience, and the observations, knowledge, training, and experience of other officers and agents. All observations referenced below that were not personally made by me, were relayed to me by those who made such observations, either verbally or via reports written by those agents and/or officers.

7. This Affidavit contains information necessary to support probable cause for this application. It is not intended to include each, and every fact and matter observed by me or law enforcement or known to the government or serve as verbatim or transcribed accounts of interviews referenced in the affidavit.

**PROBABLE CAUSE**

8. On January 15, 2025, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Intelligence Research Specialist (IRS) Brett Ledfors informed Special Agent (S/A) Hans Wiedenhofer of a Firearms Trace Summary: T20220171773, which involved a Firearm that was purchased in Canton, Ohio, and was recovered in Greece. The firearm which was the subject of

Firearms Trace Summary: T20220171773 was a Kimber, Aegis Elite Custom, 9mm pistol, bearing Serial # KUF1468 purchased on 12/17/2021 from Fin Feather Fur Outfitters Canton LLC, located at 4080 Belden Village Street, NW, Canton, Ohio. The firearm in question was recovered on 11/15/2021<sup>1</sup> from Evaggelos MANOUSELIS, in Greece. ATF-Europol Rachel Ehrlich-Ellis requested the Firearms Trace on 04/06/22. Ehrlich-Ellis wrote additional remarks under the Summary of Results Section:

SPECIAL INSTRUCTIONS - GEORGE MANOUSELIS IS THE SHIPPER  
4473 LISTS ONE ADDITIONAL HANDGUN  
PER ATF RACHEL EHRLICH-ELLIS:  
PLEASE SUBMIT THIS IS A VAULT REVIEW SINCE IT WAS ONE OF SEVERAL  
FIREARMS RECOVERED AND I  
CANNOT CONFIRM THE DATE.

9. Upon further investigation into the initial trace report, your Affiant discovered a prior request for information involving prior firearm sales by MANUSELIS included in Multiple Sales reports created by the ATF. S/A Wiedenhofer reviewed the following Multiple Sales:

**M20250029657:** On 12/29/2024, MANUSELIS purchased the following firearms from Fin Feather Fur Outfitters Canton LLC.:

- Kimber, Micro 9, 9mm Pistol, bearing Serial # STB0061243.
- Colt, Defender, 45 Caliber Pistol, bearing Serial # DF017166.
- Glock, 26Gen5, 9mm Pistol, bearing Serial # AKRZ359.

**M20240543242:** On 12/12/2024, MANUSELIS purchased the following firearms from Fin Feather Fur Outfitters Canton LLC.:

- Kimber, Micro 9, 9mm Pistol, bearing Serial # STB0061259.
- Glock, 43X, 9mm Pistol, bearing Serial # AKPX236.

---

<sup>1</sup> The actual date of the recovery was February 2, 2022. The date of the trace is incorrect.

**M20240545030:** On 12/13/2024, MANUSELIS purchased the following firearms from Fin Feather Fur Outfitters Canton LLC.:

- Beretta, 30XTOMCAT, 32 Caliber Pistol, bearing Serial # DAA665553.
- Ruger, LCP MAX, 380 Caliber Pistol, bearing Serial # R75-561699.

**M20230574748:** On 12/22/2023, MANUSELIS purchased the following firearms from Fin Feather Fur Outfitters Canton LLC.:

- Smith & Wesson, 60, 357 Caliber Revolver, bearing Serial # DYS5038.
- Smith & Wesson, 60, 357 Caliber Revolver, bearing Serial # DSB1490.
- HS Produkt, HELLCAT, 9mm Pistol, bearing Serial # BE233252.

**M20210678618:** On 12/17/2021, MANUSELIS purchased the following firearms from Fin Feather Fur Outfitters Canton LLC.:

- Kimber, Ultra Aegis II, 9mm Pistol, bearing Serial # KUF14698.
- Ruger, SP101, 357 Caliber Revolver, bearing Serial # 578-39458. \*Firearm from T20220171773.

10. IRS Ledfors informed S/A Wiedenhofer that MANUSELIS had and/or still has an import company (MANUSELIS George Import Company US) (1221 Clinton Ave., SE, North Canton, OH 44720).

11. On March 11, 2025, S/A Wiedenhofer spoke with a manager at Fin Feather Fur Outfitters who informed S/A Wiedenhofer that the only firearms that MANUSELIS purchased were the firearms listed on the aforementioned Multiple Sales.

12. On this same date, S/A Wiedenhofer reached out to ATF Liaison Officer Adam Ekstrom in the Netherlands regarding Firearms Trace Summary: T20220171773.

13. On March 18, 2025, S/A Wiedenhofer received an e-mail from Liaison Officer Ekstrom who provided HSI Incident Report # 2022SA0007664 which stated that February 2, 2022, Hellenic National Police contacted HIS Attache Athens that they had arrested George

MANOSELIS (MANUSELIS) for smuggling weapons into Greece. Three (3) firearms were concealed in the subject's suitcase. The Three (3) firearms were seized:

- Ruger, 357 Magnum Revolver, bearing Serial # 578-39458.
- Ruger, 357 Magnum Revolver, bearing Serial # 578-38126.
- Kimber, Ultra Aegis II Pistol, bearing Serial # KUF14698.

14. The Kimber (Serial # KUF14698), and the Ruger (Serial # 578-39458) were apart of Multiple Sale: M20210678618. The Two (2) firearms were purchased on 12/17/2021 from Fin Feather Fur Outfitters Canton LLC. by MANUSELIS.

15. Based on this information, your Affiant returned to Fin Feather Fur Outfitters Canton LLC, and spoke with a manager regarding MANUSELIS and the Ruger (Serial # 578-38126). The Manager queried MANUSELIS' firearms purchases in the stores "older" system. The Manager provided S/A Wiedenhofer with a printout of additional firearms purchased by MANUSELIS from 2015-2021 including on 12/28/2021, MANUSELIS purchased the following firearm from Fin Feather Fur Outfitters Canton LLC.:

Ruger, 357 Magnum Revolver, bearing Serial # 578-38126.

16. S/A Wiedenhofer created a spreadsheet that shows MANUSELIS' Travel Activity and Firearms Purchases. There appears to be a pattern that coincides with Purchasing Firearms and then traveling to Greece since as early as 2008.

PURCHASE DATE	TRAVEL DATE	TRAVEL IN/OUT	FIREARM COUNT	MAKE	SERIAL #	
1/28/2008			2	Charles Daly KBI Inc.	3124021	
				BERETTA	PK03028	
2/23/2008			1	RUGER	316-48438	
3/24/2008			1	WALTHER S&W	6161BAW	
4/28/2008			1	TAURUS	TZK52801	
5/3/2008 OUTBOUND						
10/7/2008 INBOUND						
12/14/2008			1	TAURUS	TATE5762	
12/26/2008			2	TAURUS	AT517197	
				SMITH & WESSON	DAV3409	
1/3/2009			1	KEL-TEC	AG103	
1/29/2009			1	RUGER	316-77363	
2/8/2009 OUTBOUND						
2/26/2010			2	BERETTA	PK48191	
				BERETTA	PZ08368	
4/2/2010			1	WALTHER	2597BAN	
12/16/2011 INBOUND						
12/22/2011			1	American Tactical Imp	FB100890	
2/9/2012			2	BOND ARMS INC.	81106	
				FNH USA/FN	61CMN03718	
2/17/2012			1	RUGER	318-03798	
3/1/2012 OUTBOUND						
1/22/2013			1	SMITH & WESSON	HEJ4123	
2/19/2013			1	COLT	DRS3700	
1/14/2015 INBOUND						
2/5/2015			1	SMITH & WESSON	CXB1537	
2/17/2015			1	RUGER	575-73454	
3/16/2015 OUTBOUND						
2/14/2016 INBOUND						
2/22/2016			1	KAHR	SV77046	
4/19/2016 OUTBOUND						
12/19/2017 INBOUND						
2/9/2017			2	BOND ARMS INC.	155823	
				SOCY INDUSTRIES	476617	
1/4/2018			1	KAHR	SG1167	
1/23/2018			1	COLT	DF200348	
2/17/2018 OUTBOUND						
4/23/2021 INBOUND						
5/16/2021			2	KIMBER	PB0387999	
				KIMBER	RV066882	
5/19/2021			2	KIMBER	KU361675	
				KIMBER	RV065553	
6/2/2021 OUTBOUND						
12/15/2021 INBOUND						
12/17/2021			2	KIMBER	KUF14836	Recovered in GREECE
				RUGER	578-39458	Recovered in GREECE
12/28/2021			1	RUGER	578-38126	Recovered in GREECE
1/31/2022 OUTBOUND						
12/20/2023 INBOUND						
12/21/2023			2	SMITH & WESSON	D6B1490	
				SMITH & WESSON	DYS5038	
12/22/2023			1	HS PRODUKT	BE233252	
1/25/2024 OUTBOUND						
12/10/2024 INBOUND						
12/12/2024			2	KIMBER	STB0061259	
				GLOCK	AKP9236	
12/13/2024			2	BERETTA	DAAG65553	
				RUGER	R75-561699	
12/29/2024			3	COLT	DF017166	
				GLOCK	AKR2359	
				KIMBER	STB0061243	
1/20/2025 OUTBOUND						

TOTAL # 43

17. On December 10, 2025, S/A Wiedenhofer received information from Fin Feather Fur Outfitters Firearms Records Manager Sara Nicholson that MANUSELIS was at the FFL attempting to purchase Eight (8) Firearms: five (5) Glocks, one (1) Kimber, one (1) Smith & Wesson, and one (1) Beretta.

18. On December 11, 2025, S/A Hans Wiedenhofer and S/A Josh Snyder interviewed George MANUSELIS at the RESIDENCE regarding his purchase of firearms, and his three (3) firearms that were recovered in Greece.

19. MANUSELIS informed ATF that someone stole his firearms. S/A Wiedenhofer asked MANUSELIS who stole the firearms. MANUSELIS informed that ATF that he did not know. S/A Snyder asked MANUSELIS if he filed a police report. MANUSELIS stated yeah. MANUSELIS informed ATF that he filed a police report with North Canton Police Department.

20. S/A Wiedenhofer asked MANUSELIS how many firearms were taken. MANUSELIS stated “the whole thing.” Your Affiant asked when this occurred. MANUSELIS said this was a long time.

21. Your Affiant reminded MANUSELIS that he had purchased over 40 firearms and asked if all of those firearms were stolen, MANUSELIS stated no.

22. Your Affiant asked MANUSELIS if he was taking the firearms to Greece. MANUSELIS said no.

23. Your Affiant informed MANUSELIS that three (3) of his firearms that he purchased were recovered in Greece. Your Affian asked MANUSELIS how he was getting the firearms to Greece. MANUSELIS informed ATF that he was taking them in his suitcase. S/A Wiedenhofer stated, “All of them.” MANUSELIS informed your Affiant that he took three (3) firearms in his suitcase.

24. Your Affiant informed MANUSELIS that Your Affiant knew he was at Fin Feather Fur Outfitters on 12/10/2025 attempting to purchase eight (8) firearms. Your Affiant asked MANUSELIS if those firearms were going to go to Greece, MANUSELIS said he was buying them for himself.

25. Your Affiant asked MANUSELIS how much was a firearm going for in Greece. MANUSELIS said about \$3,000.00. Your Affian asked MANUSELIS how much he was selling firearms for in Greece. MANUSELIS said about \$3,000.00.

26. Your Affian said so you're taking them to Greece. MANUSELIS said I take them, yeah.

27. Your Affiant asked MANUSELIS how many firearms he has taken to Greece. MANUSELIS said that he had taken some, but not all forty plus firearms were sent to Greece.

28. MANUSELIS said that he had taken about nine firearms to Greece.

29. MANUSELIS kept informing Your Affiant that he had a license, but it appeared to be an expired Concealed Carry Permit, not a license which permitted him to export firearms.

30. S/A Wiedenhofer asked MANUSELIS what he was going to do with the guns that he was attempting to purchase yesterday. MANUSELIS said he was going to take them to Greece.

31. At this point in the interview, Your Affiant provided MANUSELIS with a Warning Notice of Straw Purchasing Letter. MANUSELIS read the letter, acknowledged the letter, and signed the letter in the presence of S/A Snyder. S/A Wiedenhofer provided MANUSELIS with a copy of the Warning Notice of Straw Purchasing Letter.

32. Your Affiant informed MANUSELIS that he could not purchase firearms for someone else. Your Affiant informed MANUSELIS that he could not buy firearms and take

them out of the country to Greece.

33. On this same date, at approximately 3:18 PM, Your Affiant received a telephone call from Fin Feather Fur Outfitters Firearms Records who informed Your Affiant that MANUSELIS was inside the FFL and purchasing a Glock, Model: 43, 9MM Pistol, Bearing Serial # ALBR914.

34. On this same date, Your Affiant received flight information from HSI Agent Wesley Clark that MANUSELIS is scheduled to fly from Cleveland Airport to JFK Airport on January 8, 2026, and then fly from JFK Airport to Amsterdam Airport on January 8, 2026, and then fly from Amsterdam Airport to Athens Airport on January 9, 2026.

35. On December 17, 2025, at approximately 3:06 PM, S/A Hans Wiedenhofer received a telephone call from Fin Feather Fur Outfitters Firearms Record Manager Sara Nicholson. Manager Nicholson informed S/A Wiedenhofer that George MANUSELIS was inside the FFL purchasing a firearm.

36. On December 18, 2025, Manager Nicholson provided S/A Wiedenhofer with a copy of ATF Form 4473 associated with MANUSELIS' firearm purchase on December 17, 2025.

37. MANUSELIS purchased a Smith & Wesson, Model: M&P9 Shield Plus, 9MM Pistol, Bearing Serial # EJV6284.

38. On January 6, 2026, Your Affiant received information from Fin Feather Fur Outfitters Firearms Records Manager Sara Nicholson that MANUSELIS purchased Five (5) firearms since he returned to the United States in November 2025. MANUSELIS purchased the following firearms:

- On 12/11/2025, MANUSELIS purchased a Glock, Model: 43, 9MM Pistol, Bearing Serial # ALBR914. (described in paragraph 48).

- On 12/17/2025, MANUSELIS purchased a Smith & Wesson, Model: M&P9 Shield Plus, 9MM Pistol, Bearing Serial # EJV6284. (described in paragraph 65).
- On 12/26/2025, MANUSELIS purchased a COLT's PT.F.A. MFG. CO, Model: Defender Lightweight, .45 Auto Pistol, Bearing Serial # DF147254.
- On 12/31/2025, MANUSELIS purchased a Smith & Wesson, Model: M&P9, 9MM Pistol, Bearing Serial # DLY8246, and a Kimber, Model: Micro 9, 9MM Pistol, Bearing Serial # SCB0074868.

### CONCLUSION

39. Based upon the above listed facts and circumstances, I assert there is probable cause that:
- a. From on or about December 1, 2021 through and February 2, 2022, GEORGE MANUSELIS aka GEORGE MANOUSELIS, in the Northern District of Ohio and elsewhere, did knowingly export or send or attempt to export or send or receive, conceal, buy, sell or in any manner facilitate the transportation, concealment, or sale, of firearms from the United States contrary the laws and regulations of the United States, in violation of Title 18 U.S.C. Section 554.
  - b. From on or about December 1, 2021, through and February 2, 2022, GEORGE MANUSELIS aka GEORGE MANOUSELIS, in the Northern District of Ohio and elsewhere, engaged in the business of dealing firearms without a license, in violation of Title 18 U.S.C. Section 922(a)(1)(A).
  - c. From on or about December 1, 2021, through and February 2, 2022, GEORGE MANUSELIS aka GEORGE MANOUSELIS, in the Northern District of Ohio and elsewhere, did, in connection with the acquisitions of firearms from a licensed dealer of firearms, knowingly made a false statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to the fact material to the lawfulness of the sale of the firearm to the defendant, in violation of Title 18 U.S.C Section 922(a)(6).

Respectfully submitted,



---

Hans Wiedenhofer  
Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email per Crim R. 41(d)(3), on this 8th day of January 2026.



  
HONORABLE CARMEN E. HENDERSON  
UNITED STATES MAGISTRATE JUDGE