

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

AMER TASIR ZGHAILAT QARALLEH

Case No. 1:25-mj-580

Filed Under Seal

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

I, Steven Letteney, being duly sworn, deposes and states as follows:

INTRODUCTION

1. I make this affidavit in support of a criminal complaint and arrest warrant charging Amer Tasir ZGHAILAT QARALLEH (“ZGHAILAT QARALLEH”) with receipt or possession of a firearm not registered in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. § 5861(d).

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have held this position since October 2014. I am presently assigned to Falls Church Group I of the Washington Field Division. This group runs the Washington, D.C. Arson and Explosives Task Force, which is responsible for investigating arson and explosives incidents in Washington, D.C. and Northern Virginia. Before my employment with the ATF, I was a Special Agent with the U.S. Department of State, Diplomatic Security Service, for approximately five years.

3. I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations and to

make arrests. I have received training and experience in interviewing and interrogation techniques, surveillance techniques, arrest procedures, search and seizure procedures, and asset forfeiture. I further have specific and extensive additional training and experience with both firearms and explosives. I have also been involved in firearms, explosives, tobacco, gang, organized crime, money laundering, narcotics, and terrorism investigations, to include the illegal manufacture, possession and use of firearms, as defined by the National Firearms Act of 1934.

4. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation and information obtained from local and federal law enforcement officers. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of reports, documents, and/or other physical evidence obtained during this investigation. Unless otherwise stated, the conclusions and beliefs I express in this affidavit are based upon my training, experience, and knowledge of the investigation, and reasonable inferences I have drawn from my training, experience, and knowledge of the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, that statement is described in substance and is not intended to be a verbatim recitation of such statement.

5. This affidavit contains information necessary to support probable cause and has been prepared only for the purpose of obtaining a criminal complaint and arrest warrant. Therefore, it contains neither all of the information known to me concerning the offense nor every fact learned by the government during the course of its investigation thus far.

6. On the basis of information which I have reviewed and determined to be reliable, I allege that the following facts show that there is probable cause to believe that Amer Tasir ZGHAILAT QARALLEH violated Title 26, United States Code, Section 5861(d) (to receive or

possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record) on or about March 18, 2025, while in the Eastern District of Virginia.

RELEVANT STATUTORY PROVISIONS

7. Title 26, United States Code, Section 5861(d) prohibits a person from receipt or possession of a firearm that is not registered to that person in the National Firearms Registration and Transfer Record. 26 U.S.C. § 5861(d). Section 5845 of Title 26 defines a “firearm” to include “(1) a shotgun having a barrel or barrels of less than 18 inches in length.” 26 U.S.C. § 5845(a)(1).

PROBABLE CAUSE

8. On March 18, 2025, at approximately 7:05 a.m., deputies from the Fairfax County Sheriff’s Office (“FCSO”) arrived at 6829 Lois Drive, Springfield, Virginia, 22150, and conducted a Writ of Eviction (Case Number: 059GV2500156100) against ZGHAILAT QARALLEH. This residence falls within the Eastern District of Virginia. Deputies conducted a knock-and-announce, and ZGHAILAT QARALLEH answered the door.

9. Deputies informed ZGHAILAT QARALLEH they were there to conduct a Writ of Eviction and informed ZGHAILAT QARALLEH that he was required to exit the house during the eviction. ZHAILAT QARALLEH and an unidentified friend left the premises as instructed.

10. For the safety of the furniture movers who were to empty the residence, deputies first secured the residence by conducting a preliminary search for persons or dangerous weapons. While conducting this preliminary search of the residence, deputies observed multiple firearms in plain view. Deputies secured these firearms, noticing one to have been modified to shorten the barrel, and moved them into a U-haul truck that was rented by ZGHAILAT QARALLEH to

move his belongings. Deputies asked ZGHAILAT QARALLEH if there were any other weapons in the residence. ZGHAILAT QARALLEH replied there was one additional firearm located in a backpack in the master bedroom, which the deputies then retrieved and placed into the rented truck with the other firearms.

11. Following the securing of the weapons, deputies again informed ZGHAILAT QARALLEH that movers were arriving to move his property to the “right of way” and deputies asked, for the last time, if there were any further weapons inside the residence. ZGHAILAT QARALLEH stated he mistakenly forgot there was an additional weapon in a camouflage backpack in the living room.

12. Deputies then reentered the residence to secure the additional weapon. While securing this firearm, from the backpack, deputies discovered four suspected illegal explosive devices and called for assistance from explosives personnel. At some point around then, ZGHAILAT QARALLEH requested to leave to use the restroom, departed the area and did not return to the residence while law enforcement was present.

13. Bomb technicians and ATF Special Agent-Certified Explosives Specialists responded to assist. Upon arrival they assessed the devices, identifying them as suspected illegal explosive devices. FCSO deputies then obtained a Virginia search warrant for the residence, the curtilage, and all vehicles on the premises to search for evidence relating to explosives. The U-Haul truck was parked on the property in the drive way..

14. During the ensuing search, the deputies removed the firearms previously placed into the rented truck. The ATF Special Agents observed the firearms, identifying one of the firearms as a suspected short-barreled shotgun as defined in Title 26, United States Code, Section 5845(a)(1) (photograph below). This firearm was then taken into custody and sent to ATF’s

Firearms and Ammunition Technology Division (FATD) for analysis and formal classification.



15. The resulting FATD classification labeled this firearm as Exhibit 1 and stated the following:

- a. Exhibit 1 is a weapon which is designed to expel a projectile by the action of an explosive; therefore, Exhibit 1 is a “firearm” as defined in 18 U.S.C. § 921(a)(3)(A).
- b. Exhibit 1 is a shotgun having a barrel of less than 18 inches in length and therefore is a “firearm” as defined in 26 U.S.C. § 5845(a)(1).
- c. Exhibit 1 bears no NFA manufacturer’s markings of identification or a serial number as required by 26 U.S.C. § 5842.

16. Further, a query of the National Firearm Registration and Transfer Record (NFRTR) for firearms registered to ZGHAILAT QARALLEH (DOB: x/x/1983) and this specific firearm revealed no firearms were registered to ZGHAILAT QARALLEH (NFRTRs Look Up

Number: 20251049) and that this specific firearm was not registered in the NFRTR.

17. The lease provided to FCSO as part of the eviction proceedings show the agreement to be between the property owner and “Amer Zghailat.” This contract specifies the only occupant of the property is the lease holder.

18. Due to this, FCSO obtained felony warrants for ZGHAILAT QARALLEH’s arrest based on his possession of explosive devices and for possession of a sawed-off shotgun. After he was arrested, later that same day, an officer explained the charges against him. ZGHAILAT QARALLEH then spontaneously explained that the sawed-off shotgun was given to him by a friend.

CONCLUSION

19. Based on the foregoing facts, I submit that there is probable cause to believe that on or about March 18, 2025, in Springfield, Virginia, within the Eastern District of Virginia, AMER TASIR ZGHAILAT QARALLEH knowingly received or possessed a firearm, that is, a shotgun having a barrel of less than 18 inches in length, that was not registered to the defendant

in the National Firearms Registration and Transfer Record, all in violation of 26 U.S.C. § 5861(d). Due to this, I respectfully request that the Court issue a criminal complaint and arrest warrant.

Respectfully submitted,

STEVEN
LETTENEY

Digitally signed by STEVEN
LETTENEY
Date: 2025.10.08 15:07:51
-04'00'

Steven Letteney
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on October 8, 2025.

 Digitally signed by Ivan Davis
Date: 2025.10.08 15:31:49
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The Honorable Ivan D. Davis
United States Magistrate Judge