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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY _____	DEPUTY

The Honorable Grady J. Leupold

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LEE DRAPER,

Defendant.

NO. 3:26-mj-05020

COMPLAINT for VIOLATION

Title 18, United States Code, Section
922(g)(1)

BEFORE, the Honorable Grady J. Leupold, United States Magistrate Judge,
United States Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Firearm)

On or about January 22, 2026, in Thurston County, within the Western District of
Washington, Michael Lee Draper, knowing he had been convicted of the following
crimes punishable by a term of imprisonment exceeding one year:

- i. *Possession of a Stolen Firearm*, in the Lewis County Superior Court, Court
Case No. 081006225, on or about February 23, 2009, and,

1 ii. *Unlawful Possession of a Firearm*, in the Lewis County Superior Court, Court
2 Case No. 081006225, on or about February 23, 2009,
3 did knowingly possess, in and affecting interstate and foreign commerce, a firearm,

4 to wit:

5 *a black AR rifle bearing no serial number; and*

6 *a pistol bearing no serial number,*

7 All in violation of Title 18, United States Code, Section 922(g)(1).

8
9 And the complainant states that this Complaint is based on the following
10 information.

11 I, Special Agent AdriAnne N. Graaff, being first duly sworn on oath, depose and
12 say:

13 1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and
14 have been employed as such since 2006. I am currently assigned to the Seattle,
15 Washington, FBI Field Division and specifically, to the Vancouver, Washington,
16 Resident Agency. Prior to joining the FBI, I earned a Bachelor's Degree from the
17 University of Wyoming in 2001, and a Juris Doctorate from Gonzaga University School
18 of Law in Spokane, Washington in 2004. I obtained my foundational law enforcement
19 instruction through the FBI's New Agent Training at Quantico, Virginia. Over the past
20 nineteen years I have attended numerous additional trainings to enhance my investigative
21 skills. Since joining the FBI, I have been assigned to the Boston Division's Violent
22 Crimes Task Force, Public Corruption and Civil Rights squads, and I am currently
23 assigned to investigate violations of federal criminal law, including but not limited to
24 violent crime, kidnapping, fraud, public corruption, organized crime, and Civil Rights in
25 the Seattle Division's Vancouver Resident Agency.

1 2. In the past, I was assigned to multiple complex investigations and
2 previously authored and/or participated in the execution of numerous search warrants,
3 seizure warrants, arrests and/or trials. My duties included planning the execution of
4 warrants, securing and searching the premises, seizing documents, records and other
5 evidence, and interviewing victims and witnesses. I am a law enforcement officer of the
6 United States within the meaning of 18 U.S.C. § 2510(7), and I am authorized by law to
7 conduct investigations and to make arrests for felony offenses.

8 3. Title 21, United States Code, Section 921(a)(3) defines a “firearm” as:
9 (A) any weapon (including a starter gun) which will or is designed to or may readily be
10 converted to expel a projectile by the action of an explosive; (B) the frame or receiver of
11 any such weapon; (C) any firearm muffler or firearm silencer; (D) or any destructive
12 device.

13 4. On January 22, 2025, at approximately 4:04 PM, Thurston County Sheriff’s
14 Office (TCSO) Deputies pursued a reckless Dodge Ram TRX truck (the Subject Vehicle)
15 as it traveled through a very rural area of southwest Thurston County. The Subject
16 Vehicle was followed to a location near 20920 Drewery Road, Rochester, Washington
17 where the driver crashed through a fence, continued driving westbound through a field on
18 the property.

19 5. During the pursuit, TCSO learned that Cowlitz Indian Tribe Public Safety
20 Department (CIT/PSD) officers were simultaneously tracking and surveilling the two
21 subjects located inside the Subject Vehicle, Michael Lee Draper and his girlfriend, Elicia
22 Delaluz Kellam via a lawfully obtained tracking device.

23 6. A short time later, Washington State Police (WSP) surveillance aircraft
24 located the Subject Vehicle at the west end of the property located at 20920 Drewery
25 Road. TCSO Sheriff Derek Sanders located a female standing at a locked gate that
26 entered the property. The woman informed Sheriff Sanders she had been the passenger of
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1 the Subject Vehicle. The woman was positively identified as Elicia Kellam. Kellam was
2 detained by TCSO as CIT/PSD police had probable cause to arrest her for Theft in the
3 First Degree based on their ongoing investigation of Kellam and Draper.

4 7. The WSP surveillance aircraft led TCSO deputies to the Subject Vehicle
5 and advised deputies that Draper was laying down in the woods to the northwest of the
6 Subject Vehicle. TCSO K9 team arrived on scene and tracked Draper, who at that point,
7 was actively fleeing down a ravine and toward a creek through the use of a trail. TCSO
8 pursued Draper until he eventually surrendered in the mud. Draper was positively
9 identified upon arrest, and the key fob for the subject vehicle was located in Draper's
10 pocket.

11 8. Following Draper's arrest, TCSO learned that CIT/PSD were actively
12 investigating Draper and Kellam for embezzlement from CIT. CIT/PSD officers took
13 Draper and Kellam into custody and further informed TCSO that earlier that day, Draper
14 made a fraudulent purchase using the CIT account at Platt Electric in Olympia,
15 Washington, despite the fact he was no longer employed by CIT, and had no authority to
16 make purchases on their behalf. During this fraudulent purchase, Draper was observed
17 on surveillance camera walking out with boxes of Milwaukee tools and clothing.
18 CIT/PSD provided photographs of the purchased items to TCSO Sheriff Sanders.

19 9. When Sheriff Sanders approached the Subject Vehicle following Draper
20 and Kellam's arrests, he observed Milwaukee boxes in the back seat, drug paraphernalia
21 (to include a clear tube with a brown sticky substance on the inside near the center
22 console), and a green backpack. The Subject Vehicle was impounded and transported to
23 the TCSO police station located at 7717 New Market Street SW, Tumwater, WA,
24 pending execution of a search warrant.

25 10. At approximately 10:27 PM, TCSO obtained a search warrant issued by
26 Judge Anne Egeler, Thurston County Superior Court, based upon the investigation of the
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1 crimes of theft and forgery from CIT, and the drug paraphernalia Sheriff Sanders
2 observed in plain view from outside the Subject Vehicle. Judge Egeler authorized the
3 search of the subject vehicle, to include all compartments, bags, and locked containers.
4 Deputies were authorized under the search warrant to seize all firearms, firearm
5 equipment, Milwaukee tools and equipment, drug paraphernalia, illegally possessed
6 narcotics, evidence of embezzlement, such as receipts and purchase orders, and currency.

7 11. At approximately 10:42 PM, TCSO executed the search warrant of the
8 Subject Vehicle. Among the items seized were two black firearms (one pistol and one
9 AR-style rifle) with no serial numbers, a bag of white crystal substance, Cowlitz Tribe
10 fleet and Home Depot cards, and electronic devices belonging to Draper. The Subject
11 Vehicle was also seized and impounded at TCSO.

12 12. A photograph of the seized firearms and bag of white crystal substance
13 appears below:



22 13. The pistol was a branded Polymer80 or “P80” 9mm handgun. Polymer80 is
23 a brand that produces kits for homemade firearms. Polymer80 provides “80%” of a
24 firearm that can be further customized by the purchaser. In this case, it appears that this
25 was a Glock-compatible frame. The pistol did not bear a serial number, nor was there
26 evidence suggesting that a serial number had previously been affixed and subsequently
27 “scratched out.”

1 14. The AR-style rifle was a short-barreled rifle with a folding rear pistol-brace
2 stock. There was no manufacturer’s information displayed on the weapon. Like the pistol,
3 the rifle did not bear a serial number, nor was there evidence suggesting that a serial
4 number had previously been affixed and subsequently “scratched out.”

5 15. Based on my training, knowledge, and experience, I know that such
6 firearms are considered by law enforcement to be “ghost guns.”

7 16. I have reviewed court and law enforcement records related to Draper’s
8 criminal history. These records show Draper is a seven-time convicted felon, which
9 prohibits him from possessing firearms. Specifically, and with respect to firearms
10 violations, Draper was convicted on or around February 23, 2009 of *Possession of a*
11 *Stolen Firearm* (a Class B felony), and *Unlawful Firearms Possession* (a Class C felony),
12 in the Thurston County Superior Court. Draper was subsequently sentenced to serve 156
13 months in prison, with 243 days credit.

14 17. Based on the above facts, I respectfully submit that there is probable cause
15 to believe that Draper did knowingly and intentionally possess a firearm in violation of
16 Title 18, United States Code, Section 922(g)(1).

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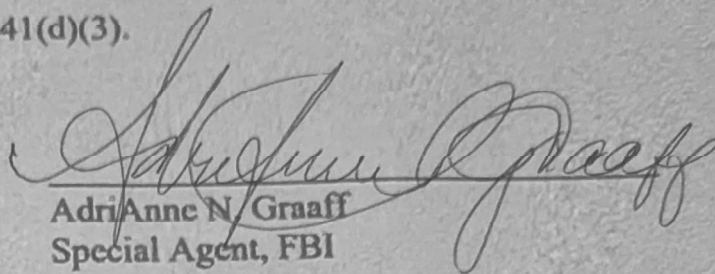
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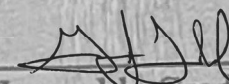
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1 18. This Complaint is being presented by reliable electronic means pursuant to
2 Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

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5 AdriAnne N. Graaff
6 Special Agent, FBI

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8 The above-named agent provided a sworn statement attesting to the truth of the
9 foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court
10 hereby finds there is probable cause to believe the Defendant committed the offenses set
11 forth in the Complaint.

12 Dated this 23rd day of January, 2026.

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15 
16 The Honorable Grady J. Leupold
17 United States Magistrate Judge

1 18. This Complaint is being presented by reliable electronic means pursuant to
2 Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

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AdriAnne N. Graaff
6 Special Agent, FBI

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8 The above-named agent provided a sworn statement attesting to the truth of the
9 foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court
10 hereby finds there is probable cause to believe the Defendant committed the offenses set
11 forth in the Complaint.

12 Dated this 23rd day of January, 2026.

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The Honorable Grady J. Leupold
16 United States Magistrate Judge