

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ORIGINAL FILED

DEC 17 2012

UNITED STATES OF AMERICA :  
v. : Hon. Patty Shwartz  
RAHMAN FULTON :  
a/k/a "Rahmon Fulton" : Mag. No. 12-3227  
: **CRIMINAL COMPLAINT**

PATTY SHWARTZ  
U.S. MAG. JUDGE

I, James Scartozzi, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 25, 2012, in Morris County, and elsewhere, in the District of New Jersey, defendant RAHMAN FULTON:

by force and violence, and by intimidation, took, and attempted to take, from the person and presence of another, and obtained and attempted to obtain by extortion any property and money and any other thing of value belonging to, and in the care, custody, control, management, and possession of, a bank, namely PNC Bank

in violation of Title 18, United States Code, Section 2113 and Section 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

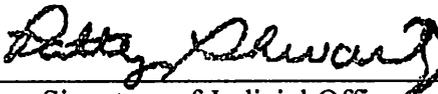
SEE ATTACHMENT A

continued on the attached page and made a part hereof.

  
James Scartozzi, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
December 12, 2012 at Newark, New Jersey

HONORABLE PATTY SHWARTZ  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

## ATTACHMENT A

I, James Scartozzi, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with law enforcement officers and others, and my review of reports, documents, and items of evidence. Where the statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. The FBI has been investigating RAHMAN FULTON in connection with a May 25, 2012, robbery of a PNC Bank located at 140 Route 10, Randolph, N.J. Shortly after 4 p.m the bank was robbed by a male holding a handgun. The bank robber wore a black cloth mask covering his head and face. The bank robber demand money from the bank tellers and was given approximately \$1,777.00, including a global positioning system ("GPS") unit which tracks its location and reports back to a central monitoring station.

2. Employees of the bank described the robber as approximately six feet to six feet three inches tall and approximately 200 to 230 pounds. RAHMAN FULTON matches this physical description.

3. Data from the GPS unit indicates that the unit was driven in a vehicle directly to the house of RAHMAN FULTON. The tracker then remained in the immediate vicinity of RAHMAN FULTON's house for several minutes before moving into the adjoining back yard. Law enforcement ultimately recovered two pieces of the GPS unit later in the day in an adjoining back yard to RAHMAN FULTON's house.

4. Video from a camera on the front exterior of a nearby house was recovered from the day of the robbery which confirms that two small objects were thrown from RAHMAN FULTON's backyard into the adjoining backyard where the two pieces of the GPS unit were found.

5. Law enforcement went to RAHMAN FULTON's home on the day of the robbery and spoke with him as part of a canvas of the neighborhood. RAHMAN FULTON told law enforcement that he was at work that day. Subsequent investigation has revealed that RAHMAN FULTON called in sick the morning of May 25, 2012 and was not at work.

6. At all times relevant to this Complaint, PNC Bank was a "bank" as defined in Title 18, United States Code, Section 2113(f).