

ATTACHMENT A

COUNT ONE

(Unlawful Possession of Firearms and Ammunition by a Convicted Felon)

On or about December 30, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SERETSE CLOUDEN,

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess three firearms—namely, one .308 caliber DPMS Panther Arms rifle, bearing serial number 13827; one 5.56 caliber AR-15 rifle, bearing serial number MM1491; and one .40 caliber Glock 22 handgun, bearing serial number XMC085—and two Glock magazines each loaded with fifteen rounds of .40 caliber ammunition, and the firearms and ammunition were in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Fraudulent Possession of an Identification Document and Authentication
Feature of the United States)

On or about December 30, 2022, in Essex County, in the District of New
Jersey and elsewhere, the defendant,

SERETSE CLOUDEN,

did knowingly possess an identification document and authentication feature
that is and appears to be an identification document and authentication feature
of the United States which was produced without lawful authority knowing that
such document or feature was stolen and produced without such authority.

In violation of Title 18, United States Code, Section 1028(a)(6).

ATTACHMENT B

I, Christopher Granato, am a Task Force Officer with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where 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. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 30, 2022, Seretse Clouden ("CLOUDEN") entered the Newark Liberty International Airport with a scheduled flight to Fort Lauderdale, Florida.

2. During routine screening of checked luggage that was destined for Fort Lauderdale, Transportation Security Administration ("TSA") agents discovered two .40 caliber Glock magazines, each containing fifteen rounds of .40 caliber ammunition. A further search of that luggage revealed a ballistic vest carrier that displayed the words "Deputy Marshal."

3. As a result of this discovery, agents responded to the gate from which the flight to Fort Lauderdale was scheduled to depart. At that time, agents made an announcement for the owner of the alarmed luggage who was identified as CLOUDEN. During this initial inquiry, CLOUDEN informed agents that he did not possess law enforcement credentials or a firearms identification card from any state.

4. CLOUDEN's other luggage was then retrieved from the aircraft. A search of that luggage revealed the following:

- a. one ASP expandable baton;
- b. one spring loaded knife;
- c. one Axon taser X26, bearing serial number X00-051402, which contained three deployable prongs;
- d. one .40 caliber Glock 22 handgun, bearing serial number XMC085;
- e. one .308 caliber DPMS Panther Arms rifle, bearing serial number 13827;

- f. one 5.56 caliber AR-15 rifle, bearing serial number MM1491, which firearm meets the definition of a machine gun as set forth in 26 U.S.C. § 5845(b); and
- g. “United States Marshal” credentials, bearing CLOUDEN’s name and photograph, and a “United States Marshal” badge.

5. An inquiry with the United States Marshals Service confirmed that CLOUDEN is not, and was not, employed with the United States Marshal Service, such that the identification documents purporting to depict CLOUDEN as a Deputy United States Marshal were fraudulent.

6. On or about April 22, 2016, CLOUDEN was convicted in the Superior Court of New Jersey, Bergen County, of unlawful possession of a weapon, in violation of N.J.S.A. 2C:39-5B, a crime punishable by imprisonment for a term exceeding one year. At the time of CLOUDEN’s guilty plea, he acknowledged that the crime to which he was pleading guilty carried a maximum potential penalty of 10 years’ imprisonment.