AO 91 (Rev. 11/11) Criminal Complaint

SEALED

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED
November 2, 2026
KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America
v.
Jerald Ray Joseph Aplon

Case No. 3:26-MJ- 1479-BT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 11, 2026 in the county of Dallas in the Northern District of Texas, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. §§ 922(g)(1) and 924(a)(8)	Possession of a firearm by a convicted felon.

This criminal complaint is based on these facts:

See attached Affidavit of ATF TFO John Brow.

☑ Continued on the attached sheet.

Complainant's signature

John Brow, ATF TFO
Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: November 2, 2026

Judge's signature

City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge
Printed name and title

Affidavit in Support of Criminal Complaint

I, John Brow, being duly sworn, depose and state as follows:

AGENT BACKGROUND

1. I am a Task Force Officer (TFO) in the Dallas Field Division with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed as such since 2020. I am also currently a robbery detective for the Dallas Police Department (DPD) and have been assigned to that position since November 2015. I have been employed as a certified peace officer commissioned by DPD for approximately 18 years. Prior to being assigned to the Robbery Unit, I was a detective working in the Gang Unit for approximately three years specifically targeting gang members, narcotic traffickers, or any other group committing serial offenses throughout the City of Dallas. I have experience investigating violations of the Texas Health and Safety Code as well as Robbery, Assault, and Kidnapping offenses including but not limited to, the procurement and execution of search warrants. Through my training, education, and experience, I have become familiar with the way robbery investigations are handled and investigated. Through my training and experience as an ATF TFO, I have become familiar with federal firearms laws and have sought and obtained criminal complaints involving alleged violations of these statutes.

2. I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 3051.

3. This affidavit is made in support of an application for a criminal complaint for **Jerald Ray Joseph APLON** for a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8),

that is unlawful possession of a firearm by a felon on or about October 11, 2026, within the Dallas Division of the Northern District of Texas.

4. The information contained in this affidavit is based on my personal knowledge and experience, my personal participation in this investigation, and information obtained from other law enforcement officers and/or agents involved in this investigation.

5. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe **APLON** violated 18 U.S.C. § 922(g)(1).

FACTS AND CIRCUMSTANCES

6. On October 11, 2026, Dallas Police Department (DPD) Child Abuse detectives received a call from DPD patrol officers notifying them that a three-year-old juvenile victim had been pronounced dead by Dallas Fire Rescue at his residence at 4950 Wadsworth Drive, Apt# 2003, Dallas, Dallas County, Texas, which is in the Dallas Division of the Northern District of Texas. DPD officers stated the juvenile victim had a gunshot wound to his head.

7. DPD officers stated L.B., who is the mother of the juvenile victim, and her two-year-old son were the only two people inside the residence where this incident took place. L.B. and her two-year-old son were transported to the Dallas Children's Advocacy Center at 5351 Samuell Blvd, Dallas, Dallas County, Texas. Detectives interviewed L.B. who stated that she was cleaning the bathroom when she heard a gunshot in her room,

where the juvenile victim and her two-year-old son were at. L.B. stated that she ran to her room, didn't see a gun and that she then grabbed the juvenile victim, who was bleeding and ran out of the apartment looking for help.

8. Detectives called **Jerald Ray Joseph APLON**, who is the father of the juvenile victim, and he voluntarily came to the Dallas Children's Advocacy Center. Detectives did an out of custody interview. During the interview **APLON** stated that he owned a Canik 9mm pistol and an AR-15. **APLON** stated that he left both of his weapons loaded and unlocked at his residence located at 4950 Wadsworth Drive, Apt# 2003, Dallas, Dallas County, Texas where the juvenile victim was shot. APLON also stated that he had left his Canik 9mm pistol in an unlocked stool that was next to his bed. **APLON** stated that the Canik 9mm had one round in the chamber and that it didn't have safety on it.

9. Detectives obtained a search warrant for 4950 Wadsworth Drive, Apt# 2003, Dallas, Dallas County, Texas, which is the residence of **APLON.** Detectives executed the search warrant with the Dallas Police Physical Evidence Squad (PES). The Canik TP9 Elite SC 9x19, 9mm pistol bearing serial number T6472-24-CB 07712 was recovered by PES in the bedroom in the stool where APLON stated he kept it. The Canik TP9 Elite SC 9x19, 9mm pistol bearing serial number T6472-24-CB 07712 was jammed with one fired 9mm casing stuck in the slide. [1]

[1] Photograph of Canik TP9 Elite SC 9x19 found on the next page.



PES also recovered a Model: RF-15, multi caliber rifle bearing serial number 24-024916 from inside a closet by PES.



10. On October 12, 2026, Dallas Medical Examiner's Office notified Sgt. Vaughn that the juvenile victim had a gunshot entrance wound around the nostril of his nose, and a gunshot exit wound towards the top of his head. Also, they stated there was gunshot stripling present on the face and in the eyes of the juvenile victim, indicating a close contact shot caused by **APLON**'s unsecured Canik 9mm pistol bearing serial number T6472-24-CB 07712.

CRIMINAL HISTORY INQUIRY

11. I reviewed **APLON**'s criminal history which showed the following conviction for a felony offense:

a. On or about September 28, 2023, in Denton County, in cause number F23-2975-362, **APLON** was convicted of Theft, a State Jail Felony, Texas Penal Code §31.03 and sentenced to 90 days confinement in the county jail under §12.44(a).

12. Based upon my review of the above felony conviction and my training and experience, I believe that probable cause exists that **APLON** was aware of his felony status prior to his possession of the above-referenced firearm on October 11, 2026.

INTERSTATE NEXUS OF THE FIREARM

13. A subsequent nexus analysis was conducted on the Canik TP9 Elite SC 9x19, 9mm pistol bearing serial number T6472-24-CB 07712 recovered in **APLON** residence. That analysis confirmed that the firearm was not manufactured in the State of Texas and has, by virtue of its presence in Texas, traveled in or affected interstate or foreign commerce before **APLON** possessed it on October 11, 2026.

[Nothing Further on This Page.]

CONCLUSION

14. Based on the above facts, I respectfully submit that there is probable cause to believe that on or about October 11, 2026, within the Dallas Division of the Northern District of Texas, **APLON** violated 18 U.S.C. §§ 922(g)(1) and 924(a)(8), that is possession of a firearm by a convicted felon and I request a warrant issue for his arrest.

_____
TED JOHN BROW
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES (ATF)

Agent sworn and signature confirmed via reliable electronic means pursuant to Fed. R. Crim. P. 4.1 on November 2, 2026.

_____
HON. REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS