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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
  
v. : Honorable Jessica S. Allen  
  
MYRON FULTON : Mag. No. 21-8122

I, Keenan Rogers, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

*Keenan Rogers*

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Keenan Rogers, Task Force Officer  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Task Force Officer Rogers attested  
to this Complaint by telephone  
pursuant to FRCP 4.1(b)(2)(A)  
on July 20, 2021 in the  
District of New Jersey

*Jessica S. Allen*

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Honorable Jessica S. Allen  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about June 30, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**MYRON FULTON,**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce a firearm and ammunition—namely, one Ruger 9 millimeter pistol, bearing serial number 33676791, and eighty-six (86) rounds of 9 millimeter ammunition.

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

## **ATTACHMENT B**

I, Keenan Rogers, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact that I know concerning this investigation. Where statements of others are set forth herein, these statements are related in substance and in part. 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 June 30, 2021, members of the Orange Police Department arrested Myron Fulton ("FULTON") for drug-related offenses and for driving a 2015 gray Nissan Altima with an expired registration. The grey Nissan, which is registered to FULTON, was towed by law enforcement that day.

2. Law enforcement later executed a search warrant on the grey Nissan and recovered the following items from the following places: one (1) black Ruger 9 millimeter pistol, bearing serial number 33676791 (the "Firearm"), loaded with eleven (11) rounds of ammunition ("Ammunition-1"), from the locked glove compartment; a high-capacity magazine containing thirty-three (33) rounds of ammunition ("Ammunition-2") from the locked glove compartment; one (1) digital scale from the locked glove compartment; a black Adidas duffle bag from the trunk; one (1) box of 9 millimeter rounds of ammunition containing forty-two (42) rounds of ammunition ("Ammunition-3") from inside of the black Adidas duffle bag; and two (2) doses of Suboxone film from the front arm rest.

3. Law enforcement also executed a search warrant on cellular telephones recovered from FULTON and found text messages from FULTON referring to the Firearm that law enforcement recovered from the grey Nissan.

4. The Firearm and Ammunition-1, Ammunition-2, and Ammunition-3 were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to FULTON's possession of them in New Jersey on or about June 30, 2021.

5. On or about July 21, 2014, FULTON was convicted of the following crimes in the Superior Court of New Jersey, Essex County: Conspiracy to Commit Attempted Aggravated Assault, a second-degree crime, in violation of N.J.S.A. 2C:5-2; Attempted Aggravated Assault, a second-degree crime, in violation of N.J.S.A. 2C:12-1B(1); and Possession of a Firearm for an Unlawful Purpose, a second-degree crime, in violation of N.J.S.A. 2C:39-4A, for which FULTON was sentenced to four years' imprisonment.