

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	Magistrate No. 24-9262
	:	
KYRELL DOMNIE,	:	<b>CRIMINAL COMPLAINT</b>
a/k/a "Fly Ky"	:	

I, Nelson Medina, 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 Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

*Nelson Medina / TAC*

Nelson Medina, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Special Agent Nelson Medina attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) on this 15 day of July, 2024.

*Cathy L. Waldor / TAC*

Hon. Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**

**Count One**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about January 5, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Two**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about January 11, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Three**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about January 24, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Four**

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

On or about January 30, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

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, Hudson County, did knowingly possess in and affecting commerce a firearm—namely, a Taurus PT111 model handgun bearing serial number TYK55863—and eleven rounds of ammunition.

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

**Count Five**  
(Firearms Trafficking)

On or about January 30, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,**  
**a/k/a “Fly Ky,”**

did knowingly and willfully ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm—namely, a Taurus PT111 model handgun bearing serial number TYK55863—to another person in or otherwise affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

**Count Six**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about February 5, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Seven**

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

On or about February 19, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

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, Hudson County, did knowingly possess in and affecting commerce a firearm—namely, a Glock 42 model .380 caliber handgun bearing serial number AFWR891—and six rounds of ammunition.

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



**Count Eight**  
(Firearms Trafficking)

On or about February 19, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,**  
**a/k/a “Fly Ky,”**

did knowingly and willfully ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm—namely, a Glock 42 model .380 caliber handgun bearing serial number AFWR891—to another person in or otherwise affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

**Count Nine**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about March 6, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Ten**

(Distribution of, and Possession with Intent to Distribute, Cocaine)

On or about April 4, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Eleven**

(Possession with Intent to Distribute Controlled Substances)

On or about April 17, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Twelve**

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

On or about April 17, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

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, Hudson County, did knowingly possess in and affecting commerce a firearm—namely, a SCCY CPX-1 nine-millimeter handgun bearing serial number 797983—and seven rounds of ammunition.

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

**Count Thirteen**

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about April 17, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**KYRELL DOMNIE,  
a/k/a “Fly Ky,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute controlled substances, as charged in Count Eleven of this Complaint, did knowingly possess a firearm—namely, a SCCY CPX-1 nine-millimeter handgun bearing serial number 797983.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

## ATTACHMENT B

I, Nelson Medina, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. 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, recorded communications, 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. From in or around December 2023 to in or around April 2024, law enforcement investigated Kyrell Domnie, a/k/a “Fly Ky” (“DOMNIE”), for firearms and narcotics offenses.

2. Throughout the investigation, law enforcement has been working with a confidential source with a history of reliability and credibility (the “CS”). Using the CS, law enforcement conducted numerous controlled purchases of cocaine and firearms from DOMNIE. Prior to each controlled purchase, law enforcement officers outfitted the CS and/or his/her vehicle with audio and/or video recording devices, which law enforcement monitored in real-time as the controlled purchases occurred. Law enforcement also provided the CS with U.S. currency to use to purchase the cocaine and firearms. Laboratory testing confirmed that the substances purchased were cocaine, and that the firearms purchased were operable. The purchases are outlined in the table below:

<b>Date of Transaction</b>	<b>Substance or Item Purchased</b>
January 5, 2024	Approximately at least 96 grams of cocaine
January 11, 2024	Approximately at least 99 grams of cocaine
January 24, 2024	Approximately at least 149 grams of cocaine
January 30, 2024	Taurus PT111 model handgun bearing serial number TYK55863 and eleven rounds of ammunition
February 5, 2024	Approximately at least 102 grams of cocaine
February 19, 2024	Glock 42 model .380 caliber handgun bearing serial number AFWR891 and six rounds of ammunition

Date of Transaction	Substance or Item Purchased
March 6, 2024	Approximately at least 100 grams of cocaine
April 4, 2024	Approximately at least 148 grams of cocaine

3. When the CS purchased the firearms and ammunition from DOMNIE on or about January 30, 2024 and on or about February 19, 2024, the CS told DOMNIE, in substance and in part, that he planned to provide the firearms to members of criminal gangs.

4. Throughout the investigation, law enforcement saw DOMNIE enter and exit an apartment located on Carroll Street in Orange, New Jersey (the “Carroll Street Apartment”). For example, on or about February 19, 2024, law enforcement saw DOMNIE retrieve a set of keys from the pocket of his clothing and use the keys to unlock and enter the Carroll Street Apartment. Law enforcement also saw DOMNIE enter and exit an apartment on the first floor of a home on Stuyvesant Avenue in Irvington, New Jersey (the “Stuyvesant Avenue Apartment”), and stay in the Stuyvesant Avenue Apartment overnight.

5. Also, throughout the investigation, law enforcement saw DOMNIE drive a black-colored Acura TLX model sedan (the “Black Acura”) and park the Black Acura both at the Carroll Street Apartment and at the Stuyvesant Avenue Apartment.

6. On or about April 17, 2024, law enforcement lawfully searched the Stuyvesant Avenue Apartment and the Carroll Street Apartment pursuant to search warrants. During a search of the Stuyvesant Avenue Apartment, where DOMNIE was present during the search, law enforcement recovered the keys to the Black Acura, which was parked in the driveway of the apartment. Law enforcement lawfully seized the Black Acura and stored it in a secure location.

7. Also on or about April 17, 2024, law enforcement lawfully searched the Carroll Street Apartment and recovered two plastic bags containing suspected fentanyl and one plastic bag containing suspected cocaine. Laboratory testing later confirmed that the plastic bags contained approximately at least 343 grams of fentanyl and approximately at least 135 grams of cocaine. Law enforcement also recovered rubber bands, wax folds stamped in red ink with the words “Bull Dog” and a dog-shaped logo, a red ink pad, a stamp bearing the words “Bull Dog” and the dog-shaped logo, small plastic jugs, glass vials, latex gloves, a vacuum sealer, and various sizes of vacuum sealable plastic bags. Based on my training and experience, I know that narcotics traffickers will often use these materials to package, store, and transport various narcotics such as fentanyl, heroin, and cocaine.



8. On or about April 29, 2024, law enforcement lawfully searched the Black Acura and discovered a hidden compartment in the center console of the vehicle. Inside the hidden compartment, law enforcement recovered one SCCY CPX-1 model nine-millimeter handgun bearing serial number 797983, which was loaded with seven rounds of ammunition, a distribution quantity of suspected heroin in wax folds stamped in red ink with the words “Bull Dog” and a dog-shaped logo, and a distribution quantity of suspected cocaine, among other items. Laboratory testing confirmed that the recovered substances were heroin and cocaine, and that the firearm was operable.

9. All three of the recovered firearms were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to DOMNIE’s possession of the Firearms in New Jersey on or about January 30, 2024, February 19, 2024, and April 17, 2024.

10. On or about October 5, 2012, DOMNIE was convicted in the Superior Court of New Jersey, Hudson County, of Possession of Controlled Dangerous Substances, a third-degree crime, in violation of N.J.S.A § 2C:35-10A(1), which is a crime punishable by imprisonment for more than one year. DOMNIE was sentenced to three years’ imprisonment on that charge.