
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

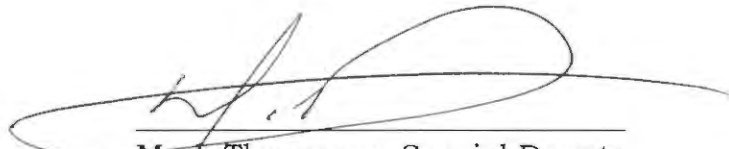
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Cathy L. Waldor, U.S.M.J.
 :
 JOHN A. FULLER : Mag. No. 21-9289
 :

I, Mark Thompson, 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 Special Deputy U.S. Marshal with the United States Attorney's Office for the District of New Jersey and that this complaint is based on the following facts:


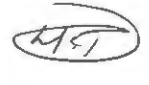
SEE ATTACHMENT B



Mark Thompson, Special Deputy
United States Marshals Service

Special Deputy Thompson attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on May 14, 2021, in the District of New Jersey

Honorable Cathy L. Waldor
United States Magistrate Judge

 
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

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

On or about October 3, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JOHN A. FULLER,

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, namely a 9 mm Millennium PT111G2 handgun, bearing serial number #TJT85055, loaded with an extended magazine containing thirty-one (31) rounds of 9 mm ammunition, and a box containing nine (9) rounds of 9 mm ammunition.

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

COUNT TWO

(Possession with Intent to Distribute Controlled Substances)

On or about October 3, 2020, in the District of New Jersey and elsewhere,
the defendant,

JOHN A. FULLER,

did knowingly and intentionally possess with 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; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; a quantity of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

COUNT THREE

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

On or about October 3, 2020, in the District of New Jersey and elsewhere, the defendant,

JOHN A. FULLER,

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the possession with intent to distribute controlled substances as set forth in Count Two, did knowingly possess a firearm, namely, 9 mm Millennium PT111G2 handgun, bearing serial number #TJT85055, loaded with an extended magazine containing thirty-one (31) rounds of 9 mm ammunition.

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

ATTACHMENT B

I, Mark Thompson, am a Special Deputy U.S. Marshal with the United States Attorney's Office for the District of New Jersey. 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 August, 2020, members of the Irvington Police Department began investigating John A. Fuller ("FULLER") for narcotics offenses. During the months of August and September 2020, law enforcement observed FULLER conduct several narcotics transactions from his residence in Newark, New Jersey (the "Residence"). Additionally, on or about September 2020, law enforcement conducted a controlled purchase of narcotics from FULLER, during which FULLER again sold narcotics from his Residence.

2. On or about October 3, 2020, law enforcement searched FULLER's Residence, as well as his Jeep Cherokee. Both searches were conducted based on search warrants. FULLER and his girlfriend, who also resides at the Residence, were present during the execution of the search warrants.

3. The officers recovered the following items from the bedroom of the Residence:

- a. A 9 mm Millennium PT111G2 handgun, bearing serial number #TJT85055 (the "Firearm"), loaded with an extended magazine containing thirty-one (31) rounds of 9 mm ammunition;
- b. A box containing nine (9) rounds of 9 mm ammunition (collectively, the "Ammunition");
- c. An empty Pro Series magazine;
- d. A .50 caliber Umarex, Model TR50 T4E air gun;
- e. Fifteen (15) ziplock bags containing marijuana;
- f. Seventy-nine (79) glassine envelopes containing heroin and fentanyl;
- g. Seventy-three (73) jugs containing a substance that, based on its appearance and packaging, appeared to be crack cocaine;

- h. One hundred and fifty-one (151) methamphetamine pills;
- i. A bag containing approximately one hundred and fifty-six (156) grams of raw methamphetamine;
- j. A clear container containing marijuana;
- k. One pill of oxycodone;
- l. Twenty-four (24) packets of Buprenorphine and Naloxone;
- m. One digital scale;
- n. One box of sandwich bags;
- o. Numerous empty Ziploc bags;
- p. Numerous empty jugs; and
- q. \$405 in United States currency.

4. Following the search of the Residence, law enforcement obtained a videotaped statement from FULLER's girlfriend, who stated that the firearms and the narcotics found in the Residence did not belong to her.

5. The officers also recovered two prescription bottles containing forty-five (45) ecstasy pills from the Jeep Cherokee.

6. I have probable cause to believe that the Firearm and Ammunition were manufactured outside the State of New Jersey and thus necessarily had to travel in interstate commerce before FULLER possessed them on or about October 3, 2020.

7. Prior to knowingly possessing the Firearm and the Ammunition, FULLER knew he was a convicted felon because on or about February 21, 2012, FULLER was convicted in the Superior Court of New Jersey, Essex County, with possession of a controlled dangerous substance in violation of N.J.S.A. 2C:35-10a and conspiracy to possess a controlled dangerous substance in violation of N.J.S.A. 2C:5-2/N.J.S.A. 2C:35-10a, both crimes punishable by imprisonment for terms exceeding one year.