

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

v.

NOAH OLEN FOWLER

CRIMINAL NO. 2:24-cr-00026

18 U.S.C. § 2
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(1)(2)
18 U.S.C. § 932(b)(1)
18 U.S.C. § 932(c)(1)
18 U.S.C. § 924(d)(1)
18 U.S.C. § 934(a)(1)(A)
18 U.S.C. § 934(a)(1)(B)
28 U.S.C. § 2461(c)

INDICTMENT
(Filed Under Seal)

BACKGROUND

1. The Defendant **NOAH OLEN FOWLER** at all times pertinent to this Indictment was a resident of Berkeley County, South Carolina.

2. From on or about March 6, 2023 to on or about December 2023 the Defendant **NOAH OLEN FOWLER** was a correctional officer at the Berkeley County Detention Center.

Count 1
(Conspiracy to Straw Purchase and Straw Purchase of Firearms)

THE GRAND JURY CHARGES:

3. Beginning at least as early as March 2023, and continuing through at least July 2023, in the District of South Carolina, and elsewhere, the Defendant **NOAH OLEN FOWLER**, as a principal and/or aider and abettor, and others, both known and unknown to the Grand Jury, did knowingly and willfully purchase and/or conspire to purchase firearms in or otherwise affecting interstate or foreign commerce, for, on behalf of, or at the request or demand of any other

person, knowing or having reasonable cause to believe that such other person had been convicted of a crime punishable by imprisonment exceeding a year, in violation of 18 U.S.C. § 922(d)(1).

Manner and Means of the Conspiracy

4. It was part of the conspiracy that the Defendant **NOAH OLEN FOWLER** did agree to purchase firearms for person(s) that he knew were prohibited from purchasing and/or possessing firearms.

5. It was further part of the conspiracy that Defendant **NOAH OLEN FOWLER**, and conspirators both known and unknown to the Grand Jury, would discuss the firearm(s) **NOAH OLEN FOWLER** was to purchase, to include whether ammunition needed to be purchased, and what **NOAH OWNER FOWLER** would charge for the straw purchasing of said firearm(s) and ammunition.

6. It was further part of the conspiracy that once the Defendant **NOAH OLEN FOWLER** had purchased said firearm(s), he would transfer it to the person he had conducted the purchase for.

Overt Acts in Furtherance of the Conspiracy

7. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the District of South Carolina:

- a. On or about March 23, 2023, a known conspirator did transfer, via Cash App, funds to the Defendant **NOAH OLEN FOWLER**.
- b. On or about March 28, 2023, the Defendant **NOAH OLEN FOWLER** did purchase a firearm, that is a Rock Island Armory, Model 206, .38 special

caliber revolver, from Gene's Pawn Shop in Moncks Corner, South Carolina.

- c. During the purchase of the firearm on or about March 28, 2023, the Defendant **NOAH OLEN FOWLER** certified on the ATF Form 4473 that he was not purchasing the firearm for another person.

All in violation of Title 18, United States Code, Sections 932(b)(1), 932(c)(1), and 2.

Count 2
(False Statement During Acquisition of a Firearm)

THE GRAND JURY FURTHER CHARGES:

8. On or about March 28, 2023, in the District of South Carolina, the Defendant **NOAH OLEN FOWLER**, as a principal and/or aider and abettor, in connection with the acquisition of a firearm, that is, a Rock Island Armory, Model 206, .38 special caliber revolver, knowingly made a false and fictitious written statement on a Form 4473 that was intended and likely to deceive Gene's Pawn Shop as to a fact material to the lawfulness of such sale of the said firearm to **NOAH OLEN FOWLER** in that **NOAH OLEN FOWLER** represented on Form 4473 that he was the actual transferee/buyer of the firearm when, as he well knew, he was not the actual transferee/buyer of the firearm.

All in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(1)(2), and 2.

FORFEITURE

FIREARM OFFENSES:

Upon conviction to violate Title 18, United States Code, Sections 922 and 932 as charged in this Indictment, the Defendant, **NOAH OLEN FOWLER**, shall forfeit to the United States all of the Defendant's rights, title, and interest in:

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) involved in or used in any knowing violation of 18 U.S.C. § 922 or 932, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1), 934(a)(1)(A), and 934(a)(1)(B), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

A. **Firearm:**

Rock Island Armory, Model 206, .38 special caliber revolver
Serial Number: RIA2578577
Seized from: Joshua Paul Stewart Turner

B. **Ammunition:**

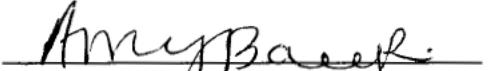
Miscellaneous rounds of .38 caliber ammunition

Pursuant to Title 18, United States Code, Sections 924(d)(1), 934(a)(1)(A), and 934(a)(1)(B), and Title 28, United States Code, Section 2461(c).

A True BILL


/FOREPERSON

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