
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Mark Falk

v.

Mag. No. 12-3619

NAINI KEBE
JEAN SIDIBE

CRIMINAL COMPLAINT

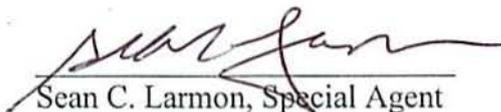
I, Sean C. Larmon, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Sean C. Larmon, Special Agent
ICE/HSI

Sworn to before me, and
subscribed in my presence

May 18²¹, 2012 at
Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

From on or about September 1, 2010, through at least on or about March 1, 2011, in Essex County, in the District of New Jersey and elsewhere, the defendants,

NAINI KEBE
JEAN SIDIBE

did conspire to transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2312.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Sean C. Larmon, am a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), assigned to the Newark Division. 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 items of 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 March 1, 2011, law enforcement officers with Customs and Border Protection inspected three containers that had been delivered to the seaport in Elizabeth, New Jersey for purposes of export to Guinea, Africa (each container carried three vehicles). Law enforcement confirmed that the nine (9) vehicles within those containers were stolen in New York, New York, as follows:

DESCRIPTION OF STOLEN VEHICLE	DATE OF THEFT
a. 2010 Toyota Highlander	February 10, 2011
b. 2010 Toyota Rav4	February 10, 2011
c. 2010 Toyota Rav4	February 10, 2011
d. 2011 Honda CR-V	February 4, 2011
e. 2008 Honda CR-V	February 4, 2011
f. 2007 Toyota Rav4	February 6, 2011
g. 2011 Honda CR-V	February 10, 2011
h. 2010 Toyota Highlander	February 6, 2011
i. 2007 Toyota Rav-4	February 10, 2011

2. Law enforcement also confirmed that each of the 9 vehicles had altered vehicle identification numbers (“VIN”), that is, the unique serial number used by the automotive industry to identify individual motor vehicles.

3. Law enforcement learned that the vehicles were being shipped by a company doing business as “Sabrina Shipping.” Sabrina Shipping is Non-Vessel Operating Common Carrier (“NVOCC”), that is, a company licensed by the Federal Maritime Commission that is

bonded and insured for purposes of exporting goods in foreign commerce. Individual persons or entities who are not licensed with the FMC obtain the services of NVOCC to ship goods overseas. The NVOCC leases containers and guarantees space on vessels being operated by major shipping carriers who will only do business with entities who are bonded and insured. The NVOCC do not take physical custody of the goods or containers. Instead, they process documents required by customs and the shipping carriers who actually ship the goods in foreign commerce, such as a Shipper's Export Declaration, bill of lading and dock receipts.

4. Law enforcement reviewed documents submitted in connection with the shipments of the stolen vehicles. A review of those documents revealed that a company doing business as "KC Shipping" and a company doing business as "Fatima's African Hair Braiding" were the shippers. The investigation revealed that both businesses were located at the same address, 732 South Street, Philadelphia, Pennsylvania. Neither company is registered with the Pennsylvania Department of State. Nor is "KC shipping" licensed with the Federal Maritime Commission, which requires companies to obtain certain licenses in order to ship goods overseas.

5. The investigation also revealed that defendant NAINÉ KEBÉ's drivers license lists 732 South Street, Philadelphia, Pennsylvania, as his residence -- the same address used "Fatima's African Hair Braiding" and "KC Shipping" on the shipping documents reviewed by law enforcement.

6. The executive officers of Sabrina Shipping positively identified NAINÉ KEBÉ and JEAN SIDIBE as the individuals who retained Sabrina Shipping for purposes of exporting the nine stolen vehicles referenced above.

7. The executive officers of Sabrina Shipping also revealed to law enforcement that in the fall of 2010 NAINÉ KEBÉ arranged a face-to-face meeting with them. At the meeting, NAINÉ KEBÉ introduced his business partner as JEAN SIDIBE. NAINÉ KEBÉ informed the executive officers of Sabrina Shipping that JEAN SIDIBE would be communicating with them about future shipments of vehicles.

8. On or about February 8, 2011, the executive officers of Sabrina Shipping received a facsimile with a header name "Jean Sidibe." The document contained shipping instructions about the stolen vehicles identified in paragraphs 1.d through 1.f., above. In addition, the document included copies of three Certificates of Title associated with those vehicles -- all of which law enforcement confirmed were altered.

9. On or about February 11, 2011, the executive officers of Sabrina Shipping received a facsimile with a header name "Jean Sidibe." The document contained shipping instructions about the stolen vehicles identified in paragraphs 1.a through 1.c., above. In addition, the document included copies of three Certificates of Title associated with those vehicles -- all of which law enforcement confirmed were altered.

10. On or about February 11, 2011, the executive officers of Sabrina Shipping received a facsimile with a header name "Jean Sidibe." The document contains shipping instructions about the stolen vehicles identified in paragraphs 1.g through 1.i., above. In

addition, the document included copies of three Certificates of Title associated with those vehicles – all of which law enforcement confirmed were altered.

11. The facsimile number that was recorded as sending the documents to Sabrina Shipping is subscribed to by AFRIFILA INTERNATIONAL, 25 Lister Avenue, Newark, New Jersey. A check of the property and business records for AFRIFILA and 25 Lister Avenue has revealed that JEAN SIDIBE is the owner and operator of that business at that location.

12. In addition to the 9 stolen vehicles identified above, law enforcement recovered 30 other stolen vehicles that were shipped by NAINÉ KEBÉ and JEAN SIDIBE through Sabrina Shipping. All 30 vehicles were stolen and had altered VINs.