UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Mark Falk
v.	:	Mag. No. 11- 3764
PETER STEWART, RANDY ANDREW, and JACKSON GEORGES	:	**CRIMINAL COMPLAINT**

I, Jeffrey Kidder, 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 Federal Bureau of Investigation ("FBI") and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Jeffrey Kidder
Special Agent, FBI

Sworn to before me and
subscribed in my presence,
October 26, 2011, at Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

Count One - Conspiracy to Traffic Firearms
(against PETER STEWART, RANDY ANDREW and JACKSON GEORGES)

From at least as early as in and around April 2010 through in and around August 2010, in Essex County, in the District of New Jersey, and elsewhere, defendants

PETER STEWART,
RANDY ANDREW and
JACKSON GEORGES

did knowingly and willfully combine, conspire and agree with each other and with others to engage in the business of dealing in firearms without being licensed to do so, and in the course of such business, to ship, transport, and receive firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Section 922(a)(1)(A).

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

Count Two - Trafficking Firearms
(against PETER STEWART, RANDY ANDREW and JACKSON GEORGES)

From at least as early as in and around April 2010 through in and around August 2010, in Essex County, in the District of New Jersey, and elsewhere, defendants

PETER STEWART,
RANDY ANDREW and
JACKSON GEORGES

did knowingly and willfully engage in the business of dealing in firearms without being licensed to do so, and in the course of such business, shipped, transported and received firearms in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(a)(1)(A) and Section 2.

Count Three - Possession of Firearm by Previously Convicted Felon
(against RANDY ANDREW)

On or about May 19, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

RANDY ANDREW

having been convicted of a crime punishable by 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 Norinco MAK-90 7.62-millimeter assault rifle bearing serial number 937677.

In violation of Title 18, United States Code, Section 922(g)(1) and Section 2.

Count Four - Possession of Firearm by Previously Convicted Felon
(against JACKSON GEORGES)

On or about May 9, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

JACKSON GEORGES

having been convicted of a crime punishable by a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce, a firearm, namely an Eagle Mark II .45 caliber submachine gun bearing serial number 26574.

In violation of Title 18, United States Code, Section 922(g)(1) and Section 2.

ATTACHMENT B

I, Jeffrey Kidder, am a Special Agent with the FBI. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. 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. From in and around April 2010 through in and around August 2010, a reliable confidential informant (the "CI"), working at the direction and under the supervision of law enforcement, met with PETER STEWART ("STEWART"), RANDY ANDREW ("ANDREW"), and/or JACKSON GEORGES ("GEORGES") (collectively referred to as "Defendants") on several occasions in and around Essex County, New Jersey to discuss the purchase of firearms from Defendants and their associates.

CONSPIRACY

2. From in and around April 2010 through in or around August 2010, in Essex County, in the District of New Jersey, and elsewhere, Defendants conspired and agreed with each other and with others to engage in the business of dealing in firearms without being licensed dealers. The object of the conspiracy was for Defendants to obtain money from selling firearms.

3. During the course of the conspiracy, Defendants sold at least thirteen (13) firearms, including assault weapons, semi-automatic handguns, semi-automatic rifles and shotguns, to the CI. Defendants worked in concert to obtain firearms from different sources and arrange for the sale of the firearms to the CI. At different times, Defendants met and traveled with the CI to prearranged secluded locations, and stored/retrieved the firearms, and/or handled the money, all in furtherance of the conspiracy. Additionally, ANDREW and GEORGES possessed firearms after both had previously obtained convictions for crimes punishable by more than one year's imprisonment.

BACKGROUND INFORMATION

4. The below-described firearm sales that occurred on May 4, 2010, May 11, 2010, June 9, 2010, June 14, 2010, June 28, 2010, June 29, 2010, July 1, 2010, and July 26, 2010, were audio and video recorded.

5. Analysis performed on each of the firearms described below in paragraphs 11 - 20 confirmed that none of the firearms were manufactured within the State of New Jersey, and thus necessarily traveled through interstate commerce prior to being possessed by Defendants.

6. Each of the firearms described below in paragraphs 11 -20 is a weapon that will, is designed to, or may readily be converted to expel a projectile by the action of an explosion, within the meaning of 18 U.S.C. § 921(a)(3).

7. A database search confirmed that none of the individuals who took part in the below-described firearm sales; STEWART, ANDREW, GEORGES, E.P. M.M. or N.P, has a federal firearms license or was otherwise licensed to deal in firearms at all times relevant to this Complaint.

8. With respect to Count Three, on or about April 24, 2006, defendant ANDREW was sentenced in connection with a conviction in the Superior Court of New Jersey of Third Degree Possession of a Controlled Dangerous Substance with Intent to Distribute within a school zone, in violation of N.J.S.A. 2C:35-7. This crime is a felony punishable by imprisonment in excess of one year.

9. With respect to Count Four, on or about May 30, 2008, defendant GEORGES was sentenced in connection with a conviction in the Superior Court of New Jersey of Third Degree Possession of a Controlled Dangerous Substance with Intent to Distribute within a school zone, in violation of N.J.S.A. 2C:35-7. This crime is a felony punishable by imprisonment in excess of one year.

OVERT ACTS

10. In furtherance of the conspiracy and to effect its objects, Defendants committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

The May 4, 2010 Sale of a Thompson Black Diamond .50 Caliber Rifle

11. On or about May 4, 2010, STEWART contacted the CI and informed him that E.P. was in possession of a firearm, and could sell the firearm to the CI. Later that day, STEWART and the CI traveled to a location in Newark, Essex County, New Jersey to meet E.P., who was in possession of a Thompson Black Diamond .50 caliber rifle bearing serial number S26964. E.P. sold this firearm to the CI for a sum of money. STEWART was paid a portion of the proceeds for brokering the sale of the firearm. Following the sale, the CI departed the scene and turned the firearm over to law enforcement.

The May 9-11, 2010 Sale of an Eagle Mark II .45 Caliber Submachine Gun and a Universal Enforcer 3000 .30 Caliber Assault Weapon

12. On or about May 9, 2010, GEORGES contacted the CI and informed him that GEORGES had obtained a firearm for the CI. Later that day, GEORGES met with the CI and provided him with an Eagle Mark II .45 caliber submachine gun bearing serial number 26574. GEORGES informed the CI that GEORGES and STEWART could also provide the CI with an assault rifle the next day, and negotiated a price for both firearms, which the CI was to pay for when he picked up the assault rifle. GEORGES instructed the CI to contact GEORGES or STEWART the following day to arrange for the pickup of the assault rifle and pay for the firearms.

13. On or about May 11, 2010, the CI drove to several locations in Newark and

Irvington, Essex County, New Jersey, to meet with STEWART, GEORGES and ANDREW for the purchase of the previously discussed assault rifle. After the CI picked up STEWART and another uncharged individual, the CI met with GEORGES and ANDREW. GEORGES told the CI to wait a few minutes for ANDREW to clean his fingerprints off of the firearm. GEORGES then entered the CI's vehicle. The CI, STEWART, GEORGES and the uncharged male then followed ANDREW to the vicinity of a laundromat in Irvington, Essex County, New Jersey, operated by ANDREW. The CI provided the previously agreed sum of money to STEWART. STEWART and GEORGES then entered the laundromat to give the money to ANDREW. Several minutes later, STEWART, GEORGES and ANDREW emerged from the laundromat. STEWART returned to the CI's vehicle and provided the CI with a Universal Enforcer 3000 .30 caliber assault weapon bearing serial number 207489. GEORGES then approached the CI's vehicle and provided the CI with a number of magazines and an amount of ammunition. After the firearm, magazines and ammunition were in the CI's vehicle, ANDREW approached the CI and stated that he could provide the CI with additional firearms, to include assault weapons, whenever the CI so desired. Following the sale, the CI departed the scene and turned over the firearms acquired on May 9 and May 11, 2010 to law enforcement.

The May 19, 2010 Sale of a Norinco MAK-90 7.62-Millimeter Assault Rifle

14. On or about May 19, 2010, STEWART contacted the CI and informed him that ANDREW had obtained an assault rifle for the CI. STEWART and the CI negotiated the price of the firearm. Later that day, STEWART and the CI traveled to meet ANDREW, who was in possession of a Norinco MAK-90 7.62-millimeter assault rifle bearing serial number 9376772. ANDREW provided this firearm to the CI in exchange for the previously negotiated sum of money, and informed the CI that he could obtain an AR-15 assault rifle and a Glock handgun in about a week. Following the sale, the CI departed the scene and turned the firearm over to law enforcement.

The June 9, 2010 Sale of a Lorcin .380 Caliber Semi-Automatic Handgun

15. On or about June 9, 2010, the CI contacted ANDREW to inquire about the purchase of the AR-15 assault rifle that was discussed during the previous sale. ANDREW informed the CI that he did not have an AR-15 available at that time, but could provide the CI with a .380 caliber handgun. ANDREW and the CI negotiated the price of the firearm. Later that day, the CI met ANDREW at a location in Newark, Essex County, New Jersey. At that time, ANDREW was in possession of a Loricin .380 caliber semi-automatic handgun bearing serial number 290230 and an amount of ammunition, which he sold to the CI for the previously negotiated sum of money. Following the sale, the CI departed the scene and turned the firearm over to law enforcement.

The June 14, 2010 Sale of a Lorcin .380 Caliber Handgun and an E.I.G. Titan .25 Caliber Handgun

16. On or about June 14, 2010, STEWART advised the CI that GEORGES had additional firearms that he could provide to the CI. Later that day, the CI picked up STEWART

and GEORGES. The three men then drove to a location in Newark, Essex County, New Jersey, where GEORGES introduced the CI to co-conspirator M.M., and informed the CI that M.M. could also provide the CI with firearms. The CI and M.M. then traveled to the residence of M.M.'s associate in Irvington, New Jersey. M.M. entered the residence and returned several minutes later with a Lorcin .380 caliber semi-automatic handgun bearing serial number 44303, and an E.I.G. Titan .25 caliber semi-automatic handgun bearing serial number A67064, which he sold to the CI in exchange for a negotiated sum of money. Following the sale, the CI departed the scene and turned the firearms over to law enforcement.

The June 28, 2010 Sale of a Century Cetme .308 Caliber Rifle

17. On or about June 28, 2010, STEWART contacted the CI and informed him that GEORGES was arrested for an unrelated offense; however, prior to being arrested, GEORGES had provided STEWART with a firearm to sell to the CI. STEWART negotiated the price of the firearm with the CI. Later that day, the CI met with STEWART, who was in possession of a Century Cetme .308 caliber rifle bearing serial number C44842. STEWART sold the firearm to the CI in exchange for the negotiated sum of money. Following the sale, the CI departed the scene and turned the firearm over to law enforcement.

The June 29, 2010 Sale of a Colt .380 Caliber Semi-Automatic Handgun

18. On or about June 29, 2010, STEWART contacted the CI and informed him that GEORGES had been released from jail, and had a firearm to sell to the CI. STEWART negotiated the price of the firearm with the CI. Later that day, the CI picked up STEWART and traveled to a location in Newark, Essex County, New Jersey, where the two men met with GEORGES. GEORGES was in possession of a Colt .380 caliber semi-automatic handgun, with an obliterated serial number, which he sold to the CI for a sum of money. STEWART received a portion of the proceeds for brokering the sale of the firearm. Following the sale, the CI departed the scene and turned the firearm over to law enforcement.

The July 1, 2010 Sale of a Maverick Arms 12-gauge Shotgun
and a Remington .22 Caliber Rifle

19. On or about July 1, 2010, GEORGES contacted the CI and informed him that M.M. could obtain firearms from his associate N.P. to sell to the CI. Later that day, the CI picked up GEORGES and drove to a location in Newark, Essex County, New Jersey, where they met M.M. M.M. entered the car and instructed the CI to drive to a house located in Irvington, Essex County, New Jersey ("Irvington Premises"), later determined to be the home of N.P. M.M. instructed the CI to park in the driveway of the Irvington Premises. M.M. asked the CI for money and the CI paid a sum of money to M.M. for the firearms. M.M. and GEORGES entered the Irvington Premises to retrieve the firearms from N.P and to pay N.P a portion of the proceeds from the sale of the firearms. Several minutes later, M.M. and GEORGES emerged from the Irvington Premises with a black plastic bag containing a 12-gauge Mossberg Maverick 88 shotgun, bearing serial number MV46276E, and a .22 caliber Remington 550-1 semi-automatic rifle, with no serial number. GEORGES placed the firearms in the back seat of the CI's vehicle.

GEORGES and the CI departed from the Irvington Premises while M.M. went back into the Irvington Premises. GEORGES was dropped off at his home and the CI left to meet law enforcement to turn over the evidence..

The July 26, 2010 Sale of a Walther .32 Caliber Handgun, and a Smith & Wesson .38 Caliber Revolver

20. On or about July 26, 2010, STEWART contacted the CI and informed him that he had obtained two firearms for the CI from unnamed individuals. STEWART negotiated the price of the firearms with the CI. Later that day, the CI met with STEWART, who was in possession of a Walther .32 caliber semi-automatic handgun bearing serial number 147966, and a Smith & Wesson .38 caliber revolver bearing serial number 252514. STEWART sold these firearms to the CI in exchange for a sum of money. Following the sale, the CI departed the scene and turned the firearms over to law enforcement.