

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

V. : **DATE FILED** _____

JOSHUA MATTHEW PEREGRIN : **VIOLATIONS:**
SEAN THOMAS STARKOSKI : **18 U.S.C. § 371 (conspiracy to possess**
: **a stolen firearm - 1 count)**
: **18 U.S.C. § 922(j) (receipt or possession of**
: **a stolen firearm - 1 count)**
: **18 U.S.C. § 922(k) (possession of a**
: **firearm with an obliterated serial number**
: **- 1 count)**
: **18 U.S.C. § 922(g)(3) (possession of a**
: **firearm by a drug user - 2 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. In or about May 2004, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOSHUA MATTHEW PEREGRIN and
SEAN THOMAS STARKOSKI**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly possess a stolen firearm, that is, a Beretta, Model 96, .40 caliber pistol, serial number BER154198, which had been shipped and transported in interstate and foreign commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Section 922(j).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant JOSHUA MATTHEW PEREGRIN stole a Beretta, Model 96, .40 caliber pistol, serial number BER154198.
3. Defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI removed the serial number from the Beretta pistol.
4. Defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI exchanged the Beretta pistol for heroin, a Schedule I controlled substance.
5. J.C., a person known to the grand jury, was given the Beretta pistol by defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI in exchange for providing the defendants with three bundles of heroin.

OVERT ACTS

In furtherance of the conspiracy, defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about May 2004, defendant JOSHUA MATTHEW PEREGRIN stole a Beretta, Model 96, .40 caliber pistol, serial no. BER154198, from the residence of a person known to the grand jury.
2. In or about May 2004, defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI removed the serial number from the Beretta pistol.
3. In or about May 2004, defendants JOSHUA MATTHEW PEREGRIN and

SEAN THOMAS STARKOSKI agreed to barter the Beretta to J.C. in exchange for heroin.

4. In or about May 2004, J.C. agreed to accept the Beretta pistol in exchange for three bundles of heroin.

5. In or about May 2004, J.C. distributed three bundles of heroin to defendants JOSHUA MATTHEW PEREGRIN and SEAN THOMAS STARKOSKI in exchange for the stolen Beretta pistol.

All in violation of Title 18, United States Code, Sections 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about May 2004, in Reading, in the Eastern District of Pennsylvania,
defendants

**JOSHUA MATTHEW PEREGRIN and
SEAN THOMAS STARKOSKI**

knowingly possessed, and aided and abetted the possession of, a stolen firearm, that is, a Beretta, Model 96, .40 caliber pistol, serial number BER154198, which had been shipped and transported in interstate and foreign commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

In violation of Title 18, United States Code, Sections 922(j) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about May 2004, in Reading, in the Eastern District of Pennsylvania,
defendants

**JOSHUA MATTHEW PEREGRIN and
SEAN THOMAS STARKOSKI**

knowingly possessed, and aided and abetted the possession of, a firearm which had the manufacturer's serial number removed, obliterated, and altered, that is, a Beretta, Model 96, .40 caliber pistol, serial number BER154198, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(k) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about May 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

JOSHUA MATTHEW PEREGRIN,

being an unlawful user of a controlled substance, that is, heroin, a schedule I controlled substance, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Beretta, Model 96, .40 caliber pistol, serial number BER154198.

In violation of Title 18, United States Code, Section 922(g)(3).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

In or about May, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

SEAN THOMAS STARKOSKI,

being an unlawful user of a controlled substance, that is, heroin, a schedule I controlled substance, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Beretta, Model 96, .40 caliber pistol, serial number BER154198.

In violation of Title 18, United States Code, Section 922(g)(3).

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Sections 922(j), 922(k), and 922(g)(3), set forth in this indictment, defendants

**JOSHUA MATTHEW PEREGRIN and
SEAN THOMAS STARKOSKI**

shall forfeit to the United States of America the firearm involved in the commission of these offenses, that is:

(1) a Beretta, Model 96, .40 caliber pistol, serial number BER154198.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**