2014R00949/MTS

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 15 –
v.	:	18 U.S.C. §§ 371 and 922(g) and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
SHAWN TRIBBETT, a/k/a "Marsh," a/k/a "Mellow"	:	INFORMATION

The defendant having waived in open Court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy To Deal In Firearms Without A License)

DEFENDANT AND CO-CONSPIRATORS

1. At all times relevant to this Information:

a. Defendant SHAWN TRIBBETT, a/k/a "Marsh," a/k/a "Mellow," was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

b. Co-Conspirator 1 was a resident of New Jersey and South Carolina, and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

c. Co-Conspirator 2 was a resident of New Jersey and South Carolina, and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

d. Co-Conspirator 3 was a resident of New Jersey and South Carolina, and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

e. Anthony Gilmore, a/k/a "Tone," was a resident of Lawnside, New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

THE CONSPIRACY

2. From in or about April 8, 2013, through on or about July 15, 2014, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

SHAWN TRIBBETT,
a/k/a "Marsh,"
a/k/a "Mellow,"

did knowingly and intentionally conspire and agree with Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, Anthony Gilmore, and others to engage in the business of dealing in firearms, while not being a federally licensed dealer, importer, or manufacturer of firearms, contrary to Title 18, United States Code, Section 922(a)(1)(A).

OBJECT OF THE CONSPIRACY

3. It was the object of the conspiracy to obtain firearms from pawn shops, gun shops, and other sources in the State of South Carolina, transport the firearms into the State of New Jersey, and resell the firearms for a profit in New Jersey.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3 obtained firearms in the State of South Carolina and elsewhere and transported the firearms to New Jersey for resale to firearms purchasers.

5. It was further part of the conspiracy that Co-Conspirator 1 and Co-Conspirator 2 obtained firearms by purchasing them from individuals who had purchased the firearms from gun shops and pawn shops (as well as other places) in the State of South Carolina.

Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3 then transported or arranged for the transportation of the firearms from South Carolina to New Jersey. At times, Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3 transported or arranged for the transportation of the firearms from South Carolina to New Jersey by train, using the railroad service, Amtrak.

6. It was further part of the conspiracy that defendant SHAWN TRIBBETT brokered the sale of the firearms obtained by Co-Conspirator 1 and Co-Conspirator 2 to a firearms purchaser. As part of the conspiracy, after defendant SHAWN TRIBBETT introduced the firearms purchaser to his co-conspirators, Co-Conspirator 1, Co-Conspirator 2, and Anthony Gilmore, sold firearms to the firearms purchaser.

7. It was further part of the conspiracy that defendant SHAWN TRIBBETT helped Co-Conspirator 1 deliver and resell firearms to the firearms purchaser and sold a firearm to the firearms purchaser on behalf of Co-Conspirator 2.

8. It was further part of the conspiracy that, on at least four occasions, defendant SHAWN TRIBBETT, either directly or through co-conspirators, sold firearms, including handguns, shotguns, and an assault-style rifle to the firearms purchaser. Defendant SHAWN TRIBBETT and his co-conspirators, at times, also provided ammunition to the firearms purchaser.

9. It was further part of the conspiracy that defendant SHAWN TRIBBETT, Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, and Anthony Gilmore communicated with the firearms purchaser by cellular telephone, text message, and private message function on the social-networking site Facebook.com.

10. It was further part of the conspiracy that once defendant SHAWN TRIBBETT or his co-conspirators sold a firearm to the firearms purchaser, they divided the profits made from the resale of the firearms which represented a portion of the proceeds of the conspiracy.

OVERT ACTS

11. In furtherance of the conspiracy and to effect its unlawful object, the following overt acts were committed in the District of New Jersey and elsewhere:

a. On or about the following dates, defendant SHAWN TRIBBETT sold or assisted Co-conspirator 1 or Co-conspirator 2 in the sale of firearms to the firearms purchaser:

DATE	FIREARMS
April 8, 2013	• a Savage Arms, model 67H, 12-gauge short-barrel shotgun with no serial number; • an Iberia Firearms, model JCP40, .40 caliber handgun, bearing serial number X742181; and • a Lorcin, model LT-25, .25 caliber handgun, bearing serial number ALT275433
April 26, 2013	• a Smith & Wesson, model SW40VE .40 caliber pistol, bearing serial number DST5207
May 20, 2013	• a 7.62 mm caliber assault-style rifle of unknown make or model, bearing serial number 88662 (and eight boxes of 12-gauge ammunition and one box of 7.62x39mm ammunition)
June 27, 2013	• a Savage Arms, model 67VR-Series C, 20-gauge short-barrel shotgun bearing serial number B334197

b. After selling or assisting in the sale of the firearms listed above, defendant SHAWN TRIBBETT divided the proceeds from the sale among his co-conspirators.

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

COUNT TWO
(Felon In Possession Of A Firearm)

On or about April 8, 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

SHAWN TRIBBETT,
a/k/a "Marsh,"
a/k/a "Mellow,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court of the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely an Iberia Firearms, model JCP40, .40 caliber handgun, bearing serial number X742181.

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

COUNT THREE
(Distribution And Possession With Intent To Distribute Cocaine)

On or about September 11, 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

SHAWN TRIBBETT,
a/k/a "Marsh,"
a/k/a "Mellow,"

did knowingly and intentionally distribute, and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

COUNT FOUR
(Felon In Possession Of A Firearm)

On or about October 28, 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

SHAWN TRIBBETT,
a/k/a "Marsh,"
a/k/a "Mellow,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court of the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely a Marlin, model 101, .22 caliber rifle with no serial number.

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

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 2014R00949

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SHAWN TRIBBETT
a/k/a "Marsh"
a/k/a "Mello"

INFORMATION FOR

Title 18 United States Code
Sections 371 and 922(g) and
Title 21 United States Code
Section 841(a)(1) and (b)(1)(C)

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