

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal No. 15-</b>
<b>v.</b>	:	
	:	<b>18 U.S.C. §§ 371, 922(a)(1)(A), 922(g)(1), &amp; 2</b>
<b>JOSHUA JACKSON</b>	:	
	:	
	:	<b><u>INFORMATION</u></b>

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

**COUNT ONE**

(Unlicensed Dealing in Firearms)

From in or about December 2009 through in or about July 2010, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA JACKSON,**

did knowingly and wilfully engage in the business of dealing in firearms, without being licensed to do so under the provisions of Title 18, United States Code, Chapter 44.

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

## **COUNT TWO**

(Conspiracy to Deal in Firearms without a Federal Firearms License)

### **DEFENDANT AND CONSPIRATORS**

1. At all times relevant to this Information:

a. Defendant JOSHUA JACKSON was a resident of the State of New Jersey and the State of Ohio and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

b. Co-conspirator Terrance Laboo was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

c. Co-conspirator F.H. was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

d. Co-conspirator S.S. was a resident of Ohio and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

2. At all times relevant to this Information, under the laws of the State of Ohio, an Ohio resident could purchase firearms, including handguns, by presenting proof of residency to a licensed firearms dealer.

### **CONSPIRACY**

3. From in or about December 2009, through in or about July 2010, in Camden County, in the District of New Jersey, and elsewhere, defendant

#### **JOSHUA JACKSON**

did knowingly and intentionally conspire and agree with co-conspirators Terrance Laboo, F.H., and others to obtain firearms through straw purchases from licensed firearms dealers in the State

of Ohio and through purchases of used firearms by S.S. at various gun shows in the State of Ohio that were not subject to background checks on the purchaser, who made false statements in the purchase of firearms and then transferred the firearms to defendant JOSHUA JACKSON, who received and later sold the firearms without a federal firearms license, and in the course of such business shipped, transported, and received firearms in interstate and foreign commerce, without being licensed to do so under federal firearms law, contrary to Title 18, United States Code, Sections 922(a)(1)(A), 922(a)(5), 922(a)(6) and 924(a)(1).

4. It was the object of the conspiracy to obtain firearms in the State of Ohio and to resell those firearms for a profit to customers in the State of New Jersey.

5. It was part of the conspiracy that defendant JOSHUA JACKSON recruited two straw purchasers, Ohio residents J.B. and W.J., and then directed them to purchase handguns for him on numerous occasions in the State of Ohio, both at licensed firearms dealers and at various guns shows held in the State of Ohio.

6. It was further part of the conspiracy that defendant JOSHUA JACKSON paid for the handgun purchases made by J.B. and W.J. and also paid them additional money as a fee for making the straw purchases.

7. It was further part of the conspiracy that immediately after purchasing each handgun in the State of Ohio, the straw purchasers, J.B. and W.J., would immediately transfer the handguns to defendant JOSHUA JACKSON, usually by placing them in the trunk of his vehicle.

8. It was further part of the conspiracy that defendant JOSHUA JACKSON also acquired numerous handguns from S.S., an illegal, unlicensed firearms dealer in the State of Ohio, who took orders from JACKSON of the type and quantity of firearms JACKSON wished

to acquire and then purchased these firearms at various gun shows around the State of Ohio to later resell them to JACKSON and other customers.

9. It was further part of the conspiracy that co-conspirator Terrance Laboo at the time was a Camden drug dealer, who sold drugs in the City of Camden with other males on an ongoing basis, and knew many other drug dealers and other criminals in the Camden, New Jersey area interested in purchasing firearms but who were not able to do so through lawful channels.

10. It was further part of the conspiracy that co-conspirator Terrance Laboo placed orders with defendant JOSHUA JACKSON and F.H. for the type and quantity of firearms he was interested in purchasing and made the logistical arrangements with them as to where they would meet so that Laboo could acquire the firearms in exchange for cash payments.

11. It was further part of the conspiracy that co-conspirator Terrance Laboo on numerous occasions throughout the time period of the conspiracy purchased and obtained firearms from defendant JOSHUA JACKSON and F.H. in exchange for cash payments made to defendant JACKSON and F.H.

12. It was a further part of the conspiracy that after the defendant, JOSHUA JACKSON, transferred the firearms to co-conspirators Terrance Laboo and, at times, F.H., Terrance Laboo and F.H. sold and delivered the firearms to drug traffickers and felons in New Jersey who were engaged in ongoing criminal activities in the State of New Jersey.

13. It was a further part of the conspiracy that co-conspirator Terrance Laboo paid defendant JOSHUA JACKSON and, at times, co-conspirator F.H., sums of cash for the firearms at prices substantially above the fair market value for these firearms had they been sold

as used handguns through lawful channels, thus generating substantial profits for defendant JACKSON and co-conspirator F.H.

#### **OVERT ACTS**

14. In furtherance of the conspiracy and to effect its unlawful object, the following overt act was committed in the District of New Jersey and elsewhere:

On or about July 12, 2010, co-conspirator Terrance Laboo sold and delivered four handguns to Agin Grant outside a barber shop Grant operated in Camden, New Jersey, which had recently been purchased and acquired from defendant JOSHUA JACKSON, who had acquired them through purchases from S.S. in the State of Ohio.

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

**COUNT THREE**

From in or about December 2009, through in or about July 2010, in Camden County, in the District of New Jersey, and elsewhere, defendant

**JOSHUA JACKSON,**

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Law Division, Burlington County, did knowingly possess in and affecting interstate commerce, firearms and ammunition.

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

  
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PAUL J. FISHMAN  
United States Attorney