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

2016 JUN 15 P 2:05

UNITED STATES OF AMERICA : Criminal No. 16- *279- NLH*
v. :
: 18 U.S.C. §§ 371, 922(a)(1)(A), 922(g)(1), & 2
FR'NEIL HICKSON :
a/k/a "Philly" :
: INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

COUNT ONE

(Unlicensed Dealing in Firearms)

From in or about December 2009 through in or about April 2013, in Camden
County, in the District of New Jersey, and elsewhere, the defendant,

FR'NEIL HICKSON,
a/k/a "Philly,"

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 Indictment:

a. Defendant **FR'NEIL HICKSON**, a/k/a "Philly," was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

b. Co-Conspirator Joshua Jackson, a/k/a "Apple," a/k/a "Trent," was a resident of New Jersey and Ohio and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

c. Co-conspirator Terrance Laboo, a/k/a Terrance Reeves, a/k/a "Mus," was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

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

e. Co-conspirator Antonio Berry was a resident of Ohio and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

f. Co-Conspirator Joseph Berry was a resident of Ohio and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

g. Co-Conspirator William Johnson 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 Indictment, 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 April 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant

FR'NEIL HICKSON
a/k/a "Philly,"

did knowingly and intentionally conspire and agree with co-conspirators Joshua Jackson, a/k/a Apple, a/k/a "Trent;" Terrance Laboo, a/k/a Terrance Reeves, a/k/a "Mus;" Stan Shor, Antonio Berry, Joseph Berry, William Johnson and others to obtain firearms outside the State of New Jersey, in other states (including the State of Ohio, the Commonwealth of Virginia, and the Commonwealth of Pennsylvania), through straw purchases from licensed firearms dealers and through purchases of used firearms at various gun shows in the State of Ohio that were not subject to background checks on the purchaser, and to transfer those firearms to other co-conspirators who transported them into the State of New Jersey, where they were resold by defendant **FR'NEIL HICKSON** and co-conspirator Terrance Laboo, 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)(3), 922(a)(5), and 924(a)(1).

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

5. It was part of the conspiracy that co-conspirator Joshua Jackson recruited two straw purchasers, co-conspirator Joseph Berry and co-conspirator William Johnson, both Ohio residents, 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 co-conspirator Joshua Jackson paid for the handgun purchases made by co-conspirator Joseph Berry and co-conspirator William Johnson 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, co-conspirator Joseph Berry and co-conspirator William Johnson, would immediately transfer the handguns to co-conspirator Joshua Jackson, usually by placing them in the trunk of his vehicle.

8. It was further part of the conspiracy that co-conspirator Joshua Jackson also acquired numerous handguns from co-conspirator Stan Shor, 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 **FR'NEIL HICKSON** and co-conspirator Joshua Jackson 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 **FR'NEIL HICKSON** and co-conspirator Joshua Jackson in exchange for cash payments made to defendant **HICKSON** and Jackson.

12. It was a further part of the conspiracy that after co-conspirator Joshua Jackson sold and transferred the firearms to defendant **FR'NEIL HICKSON** and co-conspirator Terrance Laboo, defendant **HICKSON** and Laboo re-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 **FR'NEIL HICKSON** and co-conspirator Joshua Jackson sums of cash for the purchase of 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 **HICKSON** and Jackson.

14. It was further part of the conspiracy that defendant **FR'NEIL HICKSON** obtained firearms from other sources (in addition to the firearms that he acquired from

co-conspirator Joshua Jackson) outside the State of New Jersey, including in Virginia and Pennsylvania, and resold those firearms to co-conspirator Terrance Laboo and others in and around southern New Jersey.

15. It was further part of the conspiracy that co-conspirator Joshua Jackson and co-conspirator Antonio Berry transported firearms purchased in the State of Ohio into New Jersey, using a rental vehicle which was rented by Jackson and by having Antonio Berry travel by Greyhound bus from Columbus, Ohio to bus terminals in Philadelphia, Pennsylvania; Camden, New Jersey; and Mount Laurel, New Jersey, carrying a duffel bag containing numerous firearms, where at times he was met by defendant **FR'NEIL HICKSON** or co-conspirator Terrance Laboo, who then purchased and took possession of the firearms from Antonio Berry.

16. It was further part of the conspiracy that firearms purchased from co-conspirator Joshua Jackson were delivered by Jackson and/or co-conspirator Antonio Berry to defendant **FR'NEIL HICKSON** and co-conspirator Terrance Laboo at various places in southern New Jersey including outside Greyhound bus terminals, at defendant **HICKSON'S** residence in Cherry Hill, New Jersey, and at different hotels along Route 73 in southern New Jersey that were close to the Greyhound bus terminal in Mount Laurel, New Jersey.

17. It was further part of the conspiracy that some of the firearms purchased by co-conspirator Jackson and sold to defendant **FR'NEIL HICKSON** and to co-conspirator Terrance Laboo, as well as firearms purchased by defendant **HICKSON** for resale, were semi-automatic handguns that came with high capacity magazines that could hold more than 15 rounds of live ammunition.

OVERT ACTS

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

a. 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 co-conspirator Joshua Jackson, who had acquired them through purchases from co-conspirator Stan Shor in the State of Ohio.

b. On or about December 10, 2010, defendant **FR'NEIL HICKSON** spoke with co-conspirator Joshua Jackson, by telephone while Jackson was incarcerated at Southwoods State Prison in New Jersey. In the phone call, defendant **HICKSON** asked Jackson to provide him with additional guns through Jackson's gun source in Ohio so that defendant **HICKSON** could resell them to other buyers, including co-conspirator Terrance Laboo.

c. In or about June, 2011, co-conspirator Terrance Laboo placed a telephone call to defendant **FR'NEIL HICKSON**, after receiving text messages from defendant **HICKSON** regarding firearms that defendant **HICKSON** had available for Laboo to purchase. After this phone call, co-conspirator Terrance Laboo and V.P. met defendant **HICKSON** at a motel on Route 73 in Mount Laurel, New Jersey and purchased several handguns from defendant **HICKSON** for cash.

d. On or about September 4, 2011, September 8, 2011, and September 9, 2011, co-conspirator Terrance Laboo placed outgoing calls to the cellular phone of defendant **FR'NEIL HICKSON** after receiving multiple text messages from defendant **HICKSON**,

wherein defendant **HICKSON** informed Laboo that he had acquired additional firearms in Virginia and had the firearms available for Laboo to purchase.

e. Between in or about December 2011 and in or about January 2012, defendant FR'NEIL HICKSON possessed several Ruger 9mm caliber semi-automatic handguns inside a residence on Engle Avenue in the city of Burlington, New Jersey.

f. In or about March 2013, defendant **FR'NEIL HICKSON** contacted co-conspirator Antonio Berry through Facebook and asked Berry to call defendant **HICKSON**. In a phone call shortly thereafter, defendant **HICKSON** asked Berry when co-conspirator Joshua Jackson was going to be released from custody. When Berry told defendant **HICKSON** that he did not know Jackson's release date, defendant **HICKSON** then asked Berry if he (Berry) could obtain more of "them things," a reference Berry understood to refer to additional firearms.

g. On or about March 9, 2013, defendant **FR'NEIL HICKSON** posted two photos of semi-automatic handguns on his Facebook account "wall" that were taken inside the Ready, Aim, Fire gun store and range in Bristol, Pennsylvania. Under the photographs of the handguns, Hickson posted the message: "Can't wait. I'm registered nigga."

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

COUNT THREE

The allegations set forth in Count Two, paragraphs 5 through 18 are incorporated and realleged as if fully set forth herein.

From in or about December 2009 through in or about April 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

FR'NEIL HICKSON,
a/k/a "Philly,"

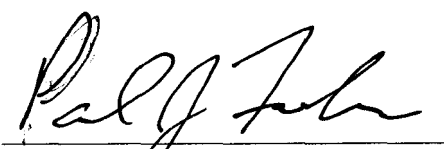
having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Law Division, Burlington County, did knowingly possess in and affecting interstate commerce, firearms and ammunition.

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

A TRUE BILL



FOREPERSON



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 2012R00549

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

UNITED STATES OF AMERICA

v.

FR'NEIL HICKSON

INDICTMENT FOR

18 United States Code §§ 371, 922(a)(1)(A), 922(g)(1), & 2

PAUL J. FISHMAN

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