

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
 :
 v. : 18 U.S.C. § 371
 :
 ANASTACIA THOMAS :
 :
 : **INFORMATION**

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

DEFENDANT AND CONSPIRATORS

1. At all times relevant to this Information:
 - a. Defendant ANASTACIA THOMAS was a resident of the State of Georgia and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.
 - b. CC-1 was a resident of the State of Georgia and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

CONSPIRACY

2. From on or about November 30, 2017 to on or about January 25, 2018, in Gloucester County, in the District of New Jersey, and elsewhere, defendant

ANASTACIA THOMAS

did knowingly and intentionally conspire and agree with CC-1 and others to engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, without being licensed to do so under federal firearms law, contrary to Title 18, United States Code, Section 922(a)(1)(A).

3. It was the object of the conspiracy to purchase firearms in states outside of New Jersey, including the State of Georgia, and then bring those firearms across state lines into New Jersey, and resell them to other individuals for a profit.

4. It was a part of the conspiracy that CC-1 drafted and sent social media messages on the internet in order to advertise the firearms for resale.

5. It was a part of the conspiracy that ANASTACIA THOMAS purchased various firearms from a pawn shop in Georgia and drove them to New Jersey for resale.

OVERT ACTS

6. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts were committed in the District of New Jersey and elsewhere:

a. Between on or about November 30, 2017 and on or about January 25, 2018, defendant ANASTACIA THOMAS purchased the following firearms in the State of Georgia, using cash every time, for the purpose of transporting the firearms across state lines and reselling them in New Jersey in order to make a profit:

Manufacturer & Model	Caliber	Serial no.
SCCY CPX-2	9mm	495671
SCCY CPX-2	9mm	369028
Taurus	9mm	TKP46157
Taurus	9mm	TPK43294
Taurus PT111 G2	9mm	TKU23729
Taurus PT111 G2	9mm	TKT7941
Taurus PT740 SLIM	.40	SKS26012
Taurus PT740 SLIM	.40	SKS25986

b. Between on or about November 30, 2017 and on or about January 25, 2018, ANASTACIA THOMAS and/or CC-1 transported the above-listed firearms into New Jersey for the purpose of selling them to other individuals in order to make a profit.

c. Between on or about November 30, 2017 and on or about January 25, 2018, CC-1 drafted and sent social media messages on the internet in order to advertise the firearms for resale.

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

FORFEITURE ALLEGATION

1. As a result of committing the firearms offense alleged in this Information, defendant ANASTACIA THOMAS shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offense, including but not limited to the following:

Manufacturer & Model	Caliber	Serial no.
SCCY CPX-2	9mm	495671
SCCY CPX-2	9mm	369028
Taurus	9mm	TKP46157
Taurus	9mm	TPK43294
Taurus PT111 G2	9mm	TKU23729
Taurus PT111 G2	9mm	TKT7941
Taurus PT740 SLIM	.40	SKS26012
Taurus PT740 SLIM	.40	SKS25986

SUBSTITUTE ASSETS PROVISION

2. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.


CRAIG CARPENITO
United States Attorney