

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

UNITED STATES OF AMERICA

v.

ANTHONY GILMORE,  
a/k/a "Tone"

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Criminal No. 14 –

18 U.S.C. §§ 371 and 922(g)(1)

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 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.

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. Co-Conspirator 4 was a resident of New Jersey and was not a licensed dealer, licensed manufacturer, or licensed importer of firearms.

### **THE CONSPIRACY**

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

ANTHONY GILMORE,  
a/k/a "Tone,"

did knowingly and intentionally conspire and agree with Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, Co-Conspirator 4, 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**

4. 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**

5. 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.

6. 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 and Co-Conspirator 2 then transported or arranged for the transportation of the

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

7. It was further part of the conspiracy that Co-Conspirator 4 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 Co-conspirator 4 had introduced the firearms purchaser to Co-Conspirator 1 and Co-Conspirator 2, defendant ANTHONY GILMORE, a/k/a "Tone," at times along with Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3, sold firearms to the firearms purchaser.

8. It was further part of the conspiracy that defendant ANTHONY GILMORE, a/k/a "Tone," assisted Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3 to deliver and resell firearms to the firearms purchaser.

9. It was further part of the conspiracy that, on at least three occasions, defendant ANTHONY GILMORE, a/k/a "Tone," sold firearms, including handguns and a shotgun, to the firearms purchaser on behalf of Co-Conspirator 1, Co-Conspirator 2, or Co-Conspirator 3.

10. It was further part of the conspiracy that defendant ANTHONY GILMORE, a/k/a "Tone," Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, and Co-Conspirator 4 communicated with the firearms purchaser by cellular telephone, text message, and private message function on the social-networking site Facebook.com.

11. It was further part of the conspiracy that in March 2014 defendant ANTHONY GILMORE, a/k/a "Tone," sold the firearms purchaser a ballistic vest.

12. It was further part of the conspiracy that once defendant ANTHONY GILMORE, a/k/a "Tone," 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**

12. 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 ANTHONY GILMORE, a/k/a "Tone," sold or assisted Co-conspirator 1, Co-conspirator 2, or Co-conspirator 3 in the sale of firearms to the firearms purchaser:

<b><u>DATE</u></b>	<b><u>FIREARMS</u></b>
January 2, 2014	<ul style="list-style-type: none"><li>• a Raven Arms, model P25, .25 caliber pistol bearing serial number 372880;</li><li>• a Lorcin model L9, 9mm pistol bearing an obliterated serial number;</li><li>• a Marlin, model 60, .22 caliber rifle bearing serial number 27291297; and</li><li>• a Savage, model Mark II, .22 caliber rifle bearing serial number 0603525</li></ul>
April 11, 2014	<ul style="list-style-type: none"><li>• a Hi-point, model C9, 9mm pistol with serial number 808132 and eight rounds of 9 mm ammunition</li></ul>
June 3, 2014	<ul style="list-style-type: none"><li>• a Maadi, model Helwan, 9mm pistol bearing serial number 1073529</li></ul>
July 8, 2014	<ul style="list-style-type: none"><li>• a short-barreled Winchester, model 370, 12-gauge shotgun, and five rounds of 12-gauge ammunition</li></ul>

b. After selling or assisting in the sale of the firearms listed above, defendant ANTHONY GILMORE, a/k/a "Tone," 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 January 2, 2014, in Camden County, in the District of New Jersey,  
and elsewhere, the defendant,

ANTHONY GILMORE,  
a/k/a "Tone,"

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 Lorcin, Model L9, 9 mm pistol with an obliterated serial number.

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

  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 2014R00901

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United States District Court  
District of New Jersey

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ANTHONY GILMORE  
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INFORMATION FOR

Title 18 United States Code  
Sections 371 and 922(g)

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