

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
JERON CARTWRIGHT, a/k/a "Jerome Cartwright," TYREE SCOTT	:	VIOLATIONS:
	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 1951 (attempted robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 846 (conspiracy to possess with the intent to distribute 5 kilograms or more of cocaine - 1 count)
	:	18 U.S.C. § 846 (attempted possession with intent to distribute 5 kilograms or more of cocaine - 1 count)
	:	18 U.S.C § 924(c)(1)(A) (carrying a firearm during and in relation to a crime of violence and to a drug trafficking crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in possession of a firearm - 1 count)
	:	18 U.S.C § 2 (aiding and abetting) Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The illegal sale, distribution, possession with intent to distribute, and trafficking, of controlled substances, that is, cocaine, are activities which affect interstate commerce.

2. From at least in or around mid-August 2013, through on or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

conspired and agreed together, and with others unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, in that defendants JERON CARTWRIGHT and TYREE SCOTT conspired to unlawfully take and obtain illegal controlled substances, that is, cocaine, from the person and in the presence of other persons against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant JERON CARTWRIGHT expressed an interest in participating in home invasion robberies of drug dealers.

4. Defendant JERON CARTWRIGHT was introduced by Person #1, a person known to the grand jury, to Person #2, also known to the grand jury, and Persons #1 and #2 advised defendant CARTWRIGHT that Person #2 was seeking help to arrange a robbery of approximately ten kilograms of cocaine.

5. Defendant JERON CARTWRIGHT undertook to plan and recruit others to participate in a home invasion robbery to steal cocaine which would then be divided equally among defendant CARTWRIGHT, Persons #1 and #2, and, the additional robbers recruited by

defendant CARTWRIGHT.

6. Defendant JERON CARTWRIGHT planned that the robbers would steal cocaine from the victim drug dealers by invading their stash house, and using firearms to control and kill the victims.

7. Defendant JERON CARTWRIGHT recruited defendant TYREE SCOTT, who agreed to carry out the planned home invasion robbery to control and kill the victims, and steal cocaine which would then be divided among the conspirators for each to sell.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants JERON CARTWRIGHT and TYREE SCOTT committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

The September 16, 2013 Planning Meeting

On or about September 16, 2013:

1. Defendant JERON CARTWRIGHT was introduced to Person #2 by Person #1 on the 900 block of North 63rd Street in Philadelphia, Pennsylvania. Person #2 claimed to be seeking help in arranging a robbery of a stash house which would contain approximately ten kilograms of cocaine.

2. Defendant JERON CARTWRIGHT planned to recruit another individual who was defendant CARTWRIGHT's neighbor, defendant TYREE SCOTT, to do the robbery. During their conversation, defendant CARTWRIGHT introduced defendant SCOTT to Persons #1 and #2. SCOTT agreed to join in the planning of the robbery, and to participate in it.

3. Defendants JERON CARTWRIGHT and TYREE SCOTT planned and discussed that once inside the stash house to be robbed, they and another accomplice would shoot and kill people inside that house.

The October 3, 2013 Planning Meeting

On or about October 3, 2013:

4. Defendant JERON CARTWRIGHT met with Persons #1 and Person #2. Defendant CARTWRIGHT repeated his plan to shoot and kill any persons in the house to be robbed as soon as he and defendant TYREE SCOTT entered it.

5. Defendant JERON CARTWRIGHT confirmed that he and his associates were ready to commit the robbery.

6. Defendant JERON CARTWRIGHT directed Persons #1 and #2 to travel with him to a block in Philadelphia, where defendant CARTWRIGHT claimed to have a number of drug dealers working there for him. Defendant CARTWRIGHT showed the block to Persons #1 and #2, and explained that the cocaine that he planned to steal during the home invasion robbery would be sold on that block.

The October 21, 2013 Meeting

On or about October 21, 2013:

7. Defendant JERON CARTWRIGHT met with Persons #1 and #2 on the 900 block of N. 63rd Street in West Philadelphia to further plan the robbery.

8. Defendant JERON CARTWRIGHT stated that he and his team would enter the house to be robbed after Person #2 had entered, and that they would be going in “shooting.”

9. Defendant JERON CARTWRIGHT affirmed that he and defendant TYREE SCOTT were ready to commit the robbery, and that defendant CARTWRIGHT intended to sell the cocaine that would be stolen during the robbery.

October 24, 2013 Attempted Armed Home Invasion Robbery

On or about October 24, 2013:

10. Defendants JERON CARTWRIGHT and TYREE SCOTT met Persons #1 and #2 at a pre-arranged location before the robbery.

11. Defendant JERON CARTWRIGHT armed himself with a Taurus Millennium Pro Model PT 140 .40 caliber semiautomatic pistol, serial number SXG 01718, loaded with 11 rounds of ammunition, gloves, and a mask.

12. Defendant TYREE SCOTT armed himself with a Glock Model 30S .45 caliber semiautomatic pistol, serial number ULF 747, loaded with 14 rounds of ammunition, gloves, and a mask.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 7 and Overt Acts 1 through 12 of Count One of this indictment are incorporated here.

2. On or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants JERON CARTWRIGHT and TYREE SCOTT unlawfully attempted to take and obtain, and aided and abetted the unlawful attempted taking and obtaining of, property, that is, cocaine, from other persons against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by using loaded firearms to threaten and control the victims and steal cocaine from them.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 7 and Overt Acts 1 through 12 of Count One of this indictment are incorporated here.

2. From at least in or around mid-August, 2013, through on or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

conspired and agreed to knowingly and intentionally possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

knowingly and intentionally attempted to possess with the intent to distribute, and aided and abetted the attempted possession with intent to distribute of, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

knowingly carried, and aided and abetted the carrying of, a firearm, that is, a Taurus Millennium Pro Model PT 140 .40 caliber semiautomatic pistol, serial number SXG 01718, loaded with 11 rounds of ammunition; and, a Glock Model 30S .45 caliber semiautomatic pistol, serial number ULF 747, loaded with 14 rounds of ammunition, during and in relation to a crime of violence and to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to commit and attempted robbery which interferes with interstate commerce in violation of Title 18, United States Code, Section 1951(a), and conspiracy and attempted possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright,"and
TYREE SCOTT,**

each having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Taurus Millennium Pro Model PT 140 .40 caliber semiautomatic pistol, serial number SXG 01718, loaded with 11 rounds of ammunition; and, a Glock Model 30S .45 caliber semiautomatic pistol, serial number ULF 747, loaded with 14 rounds of ammunition.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), as set forth in this indictment, defendants

**JERON CARTWRIGHT,
a/k/a "Jerome Cartwright," and
TYREE SCOTT**

shall forfeit to the United States of America the firearms involved in the commission of these offenses, that is,

a Taurus Millennium Pro Model PT 140 .40 caliber semiautomatic pistol, serial number SXG 01718, loaded with 11 rounds of ammunition; and a Glock Model 30S .45 caliber semiautomatic pistol, serial number ULF 747, loaded with 14 rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1).

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**