

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ROBERT EMANUEL RIVERA-TRINIDAD, a/k/a "Tito"	:	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to possess with intent to distribute 500 grams or more of cocaine - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. In or about June 2008, in Bethlehem, in the Eastern District of Pennsylvania,
defendant

**ROBERTO EMANUEL RIVERA-TRINIDAD,
a/k/a "Tito,"**

conspired and agreed, with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 500 grams or more, that is, approximately 3 kilograms, 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)(B)(ii).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant ROBERTO EMANUEL RIVERA-TRINIDAD recruited Person #1, known to the grand jury (Person #1), who was living in the Bethlehem, Pennsylvania area, to accept and receive a United States Mail parcel containing cocaine.

4. Defendant ROBERTO EMANUEL RIVERA-TRINIDAD agreed to pay Person #1 \$500 to accept the parcel at Person #1's residence and then to deliver the parcel to defendant RIVERA-TRINIDAD.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant ROBERTO EMANUEL RIVERA-TRINIDAD and others known to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

In or about June 2008:

1. Defendant ROBERTO EMANUEL RIVERA-TRINIDAD contacted his drug supplier in Puerto Rico and ordered a quantity of cocaine to be delivered via the United States Postal Service.

2. Defendant ROBERTO EMANUEL RIVERA-TRINIDAD arranged to pay Person #1 to accept the package *via* the United States Postal Service at Person #1's residence in Bethlehem, Pennsylvania.

3. On or about June 25, 2008, at the direction of defendant ROBERTO EMANUEL RIVERA-TRINIDAD, Person #1 accepted the parcel, at Person #1's residence in Bethlehem, Pennsylvania.

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

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
Acting United States Attorney