

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 08 - _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: March 11, 2008</b>
<b>NICOLE DEBRA SEBRO,</b> a/k/a Trinni,	<b>:</b>	<b>VIOLATIONS:</b>
<b>ROSE EILEEN CABAN,</b> a/k/a Rose Berg,	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to distribute</b> <b>50 grams or more of cocaine base</b>
a/k/a "GG,"	<b>:</b>	<b>("crack") - 1 count)</b>
<b>JORGE OMAR MARTINEZ GARCIA,</b> a/k/a "Omar"	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession with</b> <b>intent to distribute 5 grams or more of</b>
	<b>:</b>	<b>cocaine base ("crack") - 3 counts)</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession with</b> <b>intent to distribute cocaine base ("crack")</b>
	<b>:</b>	<b>- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about a date unknown to the grand jury, beginning at least in or about August 2006, until in or about January, 2008, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**NICOLE DEBRA SEBRO,**  
a/k/a Trinni,  
**ROSE EILEEN CABAN,**  
a/k/a Rose Berg,  
a/k/a "GG," and  
**JORGE OMAR MARTINEZ GARCIA,**  
a/k/a "Omar,"

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more, that is, at least 4 kilograms, of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

### **MANNER AND MEANS**

It was part of the conspiracy that from in or about August 2006 to in or about January 2008:

2. On a weekly basis, defendants NICOLE SEBRO, ROSE CABAN, and JORGE OMAR MARTINEZ GARCIA purchased at least two ounces (approximately 56 grams) of crack cocaine from Sean Rogers, charged elsewhere, in Easton, Pennsylvania.

3. Approximately four days of each week, defendants NICOLE SEBRO, ROSE CABAN, and JORGE OMAR MARTINEZ GARCIA contacted Sean Rogers by telephone and placed orders for crack cocaine which was delivered to and paid for by either defendants SEBRO, CABAN, and MARTINEZ GARCIA, who re-sold the crack cocaine to customers in the Easton area.

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its objects, defendants NICOLE SEBRO, ROSE CABAN, and JORGE OMAR MARTINEZ GARCIA committed the following overt acts, among others, in Easton, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about October 18, 2007, defendant ROSE CABAN possessed for distribution approximately 3.5 grams of crack cocaine.

2. On or about October 19, 2007, after defendant NICOLE SEBRO ordered approximately 14 grams of crack cocaine from Sean Rogers, defendant JORGE OMAR MARTINEZ GARCIA met with Rogers, paid Rogers in cash, and ROSE CABAN received the

crack cocaine from Rogers.

3. On or about October 21, 2007, after defendant NICOLE SEBRO ordered approximately 7 grams of crack cocaine from Sean Rogers, defendant JORGE OMAR MARTINEZ GARCIA met with Rogers, paid him in cash, and received the crack cocaine.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 18, 2007, in Easton, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

**ROSE CABAN,  
a/k/a Rose Berg,  
a/k/a “GG,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance  
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 19, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**NICOLE DEBRA SEBRO,  
a/k/a Trinni, and  
JORGE OMAR MARTINEZ GARCIA,  
a/k/a "Omar,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 21, 2007, in Easton, in the Eastern District of Pennsylvania,  
and elsewhere, defendants

**NICOLE DEBRA SEBRO,  
a/k/a Trinni,  
ROSE EILEEN CABAN,  
a/k/a Rose Berg,  
a/k/a "GG," and  
JORGE OMAR MARTINEZ GARCIA,  
a/k/a "Omar,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 26, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**NICOLE SEBRO,  
a/k/a Trinni,**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN  
United States Attorney**