

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ANTHONY HAINES TREVON ROBERTS	:	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute and possession with intent to distribute cocaine and marijuana – 1 count) 18 U.S.C. § 924(c)(1)(A) (use of a firearm in furtherance of a drug trafficking crime – 1 count) 21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine and marijuana – 2 counts) 18 U.S.C. § 922(g)(1) (possession of a firearm by convicted felon – 1 count) 18 U.S.C. § 924(e) Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about April 12, 2011, to on or about July 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY HAINES and
TREVON ROBERTS**

conspired and agreed, to knowingly and intentionally distribute, and possess with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Sections 841(a)(1), (b)(1)(C), (b)(1)(D).

MANNER AND MEANS

It was part of the conspiracy that:

2. The defendants were members of a drug organization that distributed both cocaine and marijuana, using, maintaining and leasing 7317 Greenhill Road, Apartment C-2, in Philadelphia, to conduct this activity.

3. Defendant TREVON ROBERTS conducted street-level drug sales in the Eastern District of Pennsylvania, in furtherance of the conspiracy.

4. The defendants possessed cocaine and marijuana in furtherance of their conspiracy.

5. The defendants possessed loaded firearms in furtherance of their conspiracy.

6. The defendants possessed packaging, cutting agents, and scales, along with other items, in furtherance of their conspiracy.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object(s), defendants ANTHONY HAINES and TREVON ROBERTS committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about April 12, 2011, defendant TREVON ROBERTS sold cocaine to an informant cooperating with law enforcement officers.

2. On or about April 13, 2011, defendant TREVON ROBERTS sold cocaine to an informant cooperating with law enforcement officers.

3. On or about June 16, 2011, defendant TREVON ROBERTS sold cocaine to an informant cooperating with law enforcement officers.

4. On or about July 13, 2011, defendant TREVON ROBERTS possessed several clear plastic baggies of cocaine while getting out of a black Cadillac Escalade on the 7500 block of Greenhill Road. At that time, defendant ROBERTS had keys that opened the door to 7317 Greenhill Road, Apartment C-2.

5. On or about July 13, 2011, shortly after defendant TREVON ROBERTS' arrest, defendant ANTHONY HAINES left 7317 Greenhill Road, Apartment C-2, carrying a black bag containing cocaine and marijuana. When officers identified themselves to defendant HAINES, defendant HAINES fled and began discarding items from the bag. At the time of his arrest, defendant HAINES had keys that opened the door to 7317 Greenhill Road, Apartment C-2.

6. On or about July 13, 2011, defendants ANTHONY HAINES and TREVON ROBERTS stored approximately 110 grams of cocaine and approximately 412 grams of marijuana inside 7317 Greenhill Road, Apartment C-2.

7. On or about July 13, 2011, defendants ANTHONY HAINES and TREVON ROBERTS stored two firearms, a Smith and Wesson .22 caliber revolver, serial number 108213, loaded with six live rounds, and a Colt .357 caliber revolver, serial number 79732, loaded with six live rounds, inside 7317 Greenhill Road, Apartment C-2.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY HAINES and
TREVON ROBERTS**

knowingly possessed, and aided and abetted the possession of, firearms, that is a Smith and Wesson .22 caliber revolver, serial number 108213, loaded with six live rounds, and a Colt .357 caliber revolver, serial number 79732, loaded with six live rounds, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY HAINES and
TREVON ROBERTS**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 135 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and approximately 435 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY HAINES

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 23 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and approximately 23 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY HAINES,

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 and foreign commerce a firearm, that is, one Smith and Wesson, .22 caliber six-shot revolver (serial number 108213), loaded with six live rounds; and one Colt .357 caliber six-shot revolver, (serial number 79732), loaded with six live rounds.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation 18 U.S.C. § 924(c)(1)(A) set forth in this indictment, defendants

**ANTHONY HAINES and
TREVON ROBERTS**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- a) Smith & Wesson .22 caliber revolver, serial number 108213, and six live rounds of ammunition;
- b) Colt .357 caliber revolver, serial number 79732, and six live rounds of ammunition.

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

2. As a result of the violations of 21 U.S.C. §§ 846 and 841(a)(1), set forth in this indictment, defendants

**ANTHONY HAINES and
TREVON ROBERTS**

shall forfeit to the United States of America:

- a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to a 2002 black Cadillac Escalade, Pennsylvania license plate number HTZ-8708; and

- b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$17,850, the estimated value of the cocaine and marijuana seized from defendants.
- c) If any of the property subject to forfeiture, as a result of any act or omission of the defendants:
 - i. cannot be located upon the exercise of due diligence,;
 - ii. has been transferred or sold, or deposited with, a third party;
 - iii. has been placed beyond the jurisdiction of the Court;
 - iv. has been substantially diminished in value; or
 - v. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**