

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 16-_____
v.	:	DATE FILED: _____
DONTI HUNTER	:	VIOLATIONS:
a/k/a "Dante Hunter,"		21 U.S.C. § 846
a/k/a "Pumpkin"	:	(conspiracy to distribute 28 grams
a/k/a "P"		or more of cocaine base - 1 count)
JAEKHON COOK	:	21 U.S.C. § 841(a)(1)
a/k/a "Jae Khahn Cook"		(distribution of 28 grams or more
	:	of cocaine base - 3 counts)
		21 U.S.C. § 860
	:	(distribution of 28 grams or more of
		cocaine base within 1,000 feet of a
	:	public school – 3 counts)
		18 U.S.C. § 2
	:	(aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

THE CONSPIRACY

1. From a date unknown to the grand jury in or about November 2015 through on or about March 3, 2016, in the Eastern District of Pennsylvania, defendants

**DONTI HUNTER,
a/k/a "Donte Hunter,"
a/k/a "Pumpkin,"
a/k/a "P,"
JAEKHON COOK,
a/k/a "Jae Khahn Cook,"**

conspired and agreed, with others known and unknown to the grand jury, to distribute cocaine base ("crack"), that is, 28 grams or more of a mixture and substance containing a detectable

amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), 860.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant DONTI HUNTER accepted telephone orders for cocaine base (“crack”) from purchasers, and arranged the delivery of those orders with defendant JAEKHON COOK and others known and unknown to the grand jury.

3. Defendants DONTI HUNTER, JAEKHON COOK and others known and unknown to the grand jury distributed the cocaine base (“crack”) in the Eastern District of Pennsylvania to the purchasers.

4. Defendants DONTI HUNTER, JAEKHON COOK and others known and unknown to the grand jury used cell phones to coordinate the sale of cocaine base (“crack”).

5. Defendant DONTI HUNTER, JAEKHON COOK and others known and unknown to the grand jury used multiple automobiles to distribute cocaine base (“crack”) to the purchasers, and to engage in counter surveillance of law enforcement during the deliveries.

6. Defendant DONTI HUNTER, JAEKHON COOK and others known and unknown to the grand jury used a house located on the 800 block of Preston Street in Philadelphia to hold drugs, drug proceeds, and the paraphernalia needed to cook and package cocaine base “crack.”

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants DONTI HUNTER, JAEKHON COOK and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about November 18, 2015, defendant DONTI HUNTER, while operating a black 2010 Ford F150, bearing Pennsylvania license plate ZHB-1808, met with various unidentified males on street corners in the Mantua neighborhood of Philadelphia, and received a “wad” of currency from a male unknown to the grand jury.

On or about January 29, 2016:

2. Defendant DONTI HUNTER spoke on the cell phone to a person working with law enforcement (hereinafter “buyer”), and agreed to meet the buyer at a designated location to sell cocaine base (“crack”) to the buyer.

3. Defendant DONTI HUNTER directed the buyer to a 2004 Chevrolet Impala, PA license plate JZX-7910, parked in the area of 39th Street and Girard Avenue in Philadelphia.

4. Defendant JAEKHON COOK, the sole occupant of the 2004 Chevrolet Impala, provided approximately 53.2 grams of cocaine base (“crack”) to the buyer, in exchange for \$2,400.

5. During the transaction, defendant JAEKHON COOK called defendant DONTI HUNTER on the phone. In the presence of defendant COOK, the buyer and defendant HUNTER discussed the amount of cocaine base (“crack”) being delivered to the buyer.

6. At the conclusion of the drug transaction, defendant JAEKHON COOK drove the 2004 Chevrolet Impala away. A male fitting the description of defendant DONTI HUNTER, driving a black Ford F150 resembling the one observed on November 18, 2015, trailed the Chevrolet Impala out of the area.

On or about February 2, 2016:

7. Defendant DONTI HUNTER spoke on the cell phone to the buyer, and

agreed to meet the buyer at a designated location to sell cocaine base (“crack”) to the buyer.

8. Defendant DONTI HUNTER arrived at the designated location driving a 2004 Chevrolet Impala, PA license plate JZX-7910. Defendant HUNTER told the buyer to wait for the delivery of the narcotics, and then drove away from the location.

9. Defendant DONTI HUNTER drove back to the designated location approximately one hour later. Defendant HUNTER called the buyer on the cell phone and asked the buyer to follow defendant HUNTER a short distance to another location.

10. Defendant DONTI HUNTER entered the buyer’s vehicle and delivered approximately 113 grams of cocaine base (“crack”) in exchange for \$5,200.

On or about February 23, 2016:

11. A 2006 Buick Lucerne, PA license JZS-8044, driven by a person unknown to the grand jury, picked defendant DONTI HUNTER up at Liberty Management Regional Reentry Center, and drove defendant HUNTER to the 800 block of Preston Street, in the Mantua neighborhood of Philadelphia.

12. Defendant DONTI HUNTER spoke on the cell phone to the buyer, and agreed to meet the buyer at a designated location to sell cocaine base (“crack”) to the buyer.

13. Defendant DONTI HUNTER called the buyer, told the buyer there was law enforcement activity in the vicinity of the designated location, and instructed the buyer to move to another location.

14. A person matching the description of defendant DONTI HUNTER exited 867 Preston Street and provided an unknown item to two males, unknown to the grand jury, who were inside the 2006 Buick Lucerne that had driven defendant HUNTER to the street earlier in the day.

15. The 2006 Buick Lucerne, occupied by two males unknown to the grand jury, was driven to the changed location identified by defendant DONTI HUNTER. One of the males gave the buyer approximately 55.2 grams of cocaine base (“crack”) in exchange for \$2,400.

16. The two unknown males drove the 2006 Buick Lucerne to the area of the 800 block of Preston Street, exited the car, and ran into 867 Preston Street while carrying a small bag. A man fitting the description of defendant DONTI HUNTER, who had been standing outside the address, followed them into the home.

17. On March 3, 2016, a search of 867 Preston Street resulted in the seizure of approximately 21 grams of cocaine base (“crack”), equipment used for the manufacture, packaging and storage of cocaine base (“crack”), scales, razors, magazines and ammunition for guns, 15 cell phones and \$1,400 in cash. A male and female, known to the grand jury, were found in the house.

18. On March 3, 2016, defendant DONTI HUNTER was arrested at Liberty Management Regional Reentry Center, and found in possession of \$228 in cash and three cell phones.

19. On March 3, 2016, a person, unknown to the grand jury, driving the black 2010 Ford F150, bearing Pennsylvania license plate ZHB-1808, failed to stop in response to a law enforcement order, and drove away, including driving the wrong way down a one way street, in order to evade police.

20. The three transactions on January 29, February 2 and February 23, 2016 all occurred within 1,000 feet of the real property comprising the School of the Future, a public high school, located at 4021 Parkside Ave, in Philadelphia, PA.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2016, in the Eastern District of Pennsylvania, defendants

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,” and
JAEKHON COOK,
a/k/a “Jae Khahn Cook,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 28 grams or more, that is, approximately 53.2 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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2016, in the Eastern District of Pennsylvania, defendants

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,” and
JAEKHON COOK,
a/k/a “Jae Khahn Cook,”**

knowingly and intentionally distributed a mixture and substance and aided and abetted the distribution of, 28 grams or more, that is, approximately 53.2 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the School of the Future, a public high school, located at 4021 Parkside Ave, in Philadelphia, PA, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), 18 U.S.C. § 2.

In violation of Title 21, United States Code, Section 860(a) and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2016, in the Eastern District of Pennsylvania, defendant

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,”**

knowingly and intentionally distributed, 28 grams or more, that is, approximately 112.9 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).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2016, in the Eastern District of Pennsylvania, defendant

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 112.9 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the School of the Future, a public high school, located at 4021 Parkside Ave, in Philadelphia, PA, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2016, in the Eastern District of Pennsylvania, defendant

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 28 grams or more, that is, approximately 55.2 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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2016, in the Eastern District of Pennsylvania, defendant

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,”**

knowingly and intentionally distributed a mixture and substance and aided and abetted the distribution of, 28 grams or more, that is, approximately 55.2 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the School of the Future, a public high school, located at 4021 Parkside Ave, in Philadelphia, PA, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), 18 U.S.C. § 2.

In violation of Title 21, United States Code, Section 860(a) and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) and 860, set forth in this indictment, defendant

**DONTI HUNTER,
a/k/a “Donte Hunter,”
a/k/a “Pumpkin,”
a/k/a “P,” and
JAEKHON COOK,
a/k/a “Jae Khahn Cook,”**

shall forfeit to the United States of America

(a) Any and all real and/or personal property, which the defendants used in any manner or part, to facilitate the commission of the violations charged in this indictment, including but not limited to, the following:

(1) a 2004 Chevrolet Impala, bearing Pennsylvania license plate JZX-7910;

(2) a 2006 Buick Lucerne, bearing Pennsylvania license plate JZS-8044;

(3) a black 2010 Ford F150, bearing Pennsylvania license plate ZHB-1808; and

(b) Any and all real and/or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations charged in this indictment, including but not limited to, the following:

(1) \$1,628 seized on or about March 3, 2016

2. If any of the property described above as being subject to forfeiture, as a

result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty

it is the intent 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 said property listed above as being subject to forfeiture.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney