

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

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| PARIS CHURCH | : | VIOLATIONS: |
| MICHAEL PINKNEY | : | 21 U.S.C. § 846 (conspiracy to |
| SHAWN MILLS | : | distribute cocaine – 1 count) |
| TIFFANY BEAUFORD | | 21 U.S.C. § 846 (attempted distribution of |
| RAPHAEL HUNT- IRVING | | cocaine, 28 grams or more of cocaine base |
| | | (“crack”) and heroin - 1 count) |
| | | 21 U.S.C. § 846 (attempted possession with |
| | | intent to distribute cocaine - 1 count) |
| | | 21 U.S.C. § 843(b) (use of a |
| | | communication facility – 3 counts |
| | | 18 U.S.C. § 2 (aiding and abetting) |
| | | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about December 17, 2013 through in or about March, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**PARIS CHURCH,
MICHAEL PINKNEY,
SHAWN MILLS,
TIFFANY BEAUFORD,
and
RAPHAEL HUNT – IRVING**

conspired and agreed together and with others known and unknown to the grand jury, knowingly and intentionally distribute 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)(C).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant PARIS CHURCH supplied cocaine and cocaine base (“crack”) to defendants SHAWN MILLS and TIFFANY BEAUFORD for re-sale.

3. Defendants RAPHAEL HUNT-IRVING and SHAWN MILLS contributed money for defendant PARIS CHURCH to send to his suppliers in order to obtain narcotics for re-sale in and around the city of Chester, PA.

4. Defendant MICHAEL PINKNEY supplied defendant PARIS CHURCH with kilogram quantities of cocaine.

5. Defendants PARIS CHURCH and MICHAEL PINKNEY used cell phones to communicate with one another to conduct narcotics transactions.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants PARIS CHURCH, MICHAEL PINKNEY, SHAWN MILLS, TIFFANY BEAUFORD and RAPHAEL HUNT - IRVING committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 17, 2013, defendants PARIS CHURCH and MICHAEL PINKNEY used the telephone to discuss CHURCH’S desire to purchase cocaine.

2. On or about January 14, 2014, defendant MICHAEL PINKNEY called defendant PARIS CHURCH and quoted a price of \$35,000 for a kilo of cocaine.

3. On or about February 7, 2014 defendant MICHAEL PINKNEY called defendant PARIS CHURCH and told him that the lowest price his supplier would sell the kilogram

of cocaine for was \$27,000.00. PINKNEY also confirmed that defendant RAPHAEL HUNT - IRVING was aware of the deal.

4. On or about February 12, 2014 defendant PARIS CHURCH called defendant MICHAEL PINKNEY and told him he had money for the kilogram of cocaine. Defendant CHURCH shipped the cash to defendant PINKNEY by Federal Express later that day.

On or about February 14, 2014:

5. Defendant MICHAEL PINKNEY called defendant PARIS CHURCH and told him he needed him to send him \$1,500 by way of Western Union in order to complete the purchase of the cocaine.

6. Defendant SHAWN MILLS gave defendant PARIS CHURCH the \$1,500 he needed to send to defendant MICHAEL PINKNEY in order to complete the purchase of the cocaine.

7. Defendant PARIS CHURCH sent the additional \$1,500 to defendant MICHAEL PINKNEY in California.

On or about February 18, 2014:

8. Defendant MICHAEL PINKNEY and defendant PARIS CHURCH discuss shipping the package to either defendant RAPHAEL HUNT – IRVING’s home or defendant TIFFANY BEAUFORD’S workplace.

9. Defendant MICHAEL PINKNEY shipped the cocaine to defendant TIFFANY BEAUFORD’S work address via Federal Express.

On or about February 22, 2014:

10. Defendant PARIS CHURCH called the Federal Express automated

customer service line to check the delivery status of the drugs shipped to him by defendant MICHAEL PINKNEY.

11. Defendant TIFFANY BEAUFORD called the Federal Express customer service line and requested an explanation of what it means when a package is “shipped back to the government warehouse.”

12. Defendant RAPHAEL HUNT-IRVING called defendant PARIS CHURCH to inquire about their missing package.

On or about February 23, 2014:

13. Defendant TIFFANY BEAUFORD telephoned Federal Express customer service and attempted to change the delivery address on the missing shipment of drugs.

14. Defendant RAPHAEL HUNT - IRVING spoke to defendant PARIS CHURCH and asked if the package had been delivered. Defendant PARIS CHURCH told him it had not and met defendant HUNT - IRVING to show him the information regarding the package that Federal Express had placed on their website.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2014, in Chester, in the Eastern District of Pennsylvania and California, defendant

MICHAEL PINKNEY

knowingly and intentionally attempted to distribute and aided and abetted the attempted distribution of approximately 495.4 grams of a mixture and substance containing a detectable amount of cocaine, and 28 grams or more, that is, approximately 59.9 grams of a mixture and substance containing cocaine base (“crack”), both Schedule II controlled substances and 14 grams of a mixture and substance containing a detectable amount of heroin, Schedule I controlled substance in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), (b)(1)(C).

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 21, 2014, in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
RAPHAEL HUNT – IRVING,
SHAWN MILLS, and
TIFFANY BEAUFORD**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute 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)(C).

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2014 in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
and
TIFFANY BEAUFORD**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant BEAUFORD used the telephone to send a text message to defendant CHURCH discussing selling cocaine base (“crack”) to a customer.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 15, 2014 in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
and
TIFFANY BEAUFORD**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant CHURCH used the telephone to discuss distributing 63 grams of cocaine with defendant BEAUFORD.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2014 in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
and
TIFFANY BEAUFORD**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant BEAUFORD used the telephone to discuss processing cocaine for re-distribution with defendant CHURCH.

In violation of Title 21, United States Code, Section 843(b).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 846, 843(b), 841(a)(1), and 860 set forth in this indictment, defendants

**PARIS CHURCH
MICHAEL PINKNEY
SHAWN MILLS
TIFFANY BEAUFORD
RAPHAEL HUNT – IRVING**

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; and
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

If any of the property 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 party;
- (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 divided 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 other property of the defendants up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**