

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 5 kilograms or more 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), (b)(1)(C).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant ANTHONY POTTER supplied cocaine to defendant PARIS CHURCH and others for re-sale.
3. Defendants ANTHONY POTTER and PARIS CHURCH arranged with others to purchase kilogram quantities of cocaine.
4. Defendant ANTHONY POTTER made arrangements to transport a vehicle containing cocaine from Houston to the East Coast, for ultimate delivery to Chester, Pennsylvania.
5. Defendants ANTHONY POTTER and PARIS CHURCH exchanged telephone calls and text messages with each other to negotiate the purchase of kilograms of cocaine.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants ANTHONY POTTER and PARIS CHURCH committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 16, 2013, defendants PARIS CHURCH and ANTHONY POTTER used the telephone to discuss the availability of kilogram quantities of cocaine.

2. On or about January 15, defendant ANTHONY POTTER distributed approximately one kilogram of cocaine to defendant PARIS CHURCH.
 3. On or about January 16, 2014, defendant ANTHONY POTTER distributed approximately 250 grams of cocaine to defendant PARIS CHURCH.
 4. On or about January 17, 2014, defendant ANTHONY POTTER distributed approximately 250 grams of cocaine to defendant PARIS CHURCH.
 5. On or about February 8, 2014, defendant ANTHONY POTTER distributed approximately 625 grams of cocaine to defendant PARIS CHURCH.
 6. On or about March 31, 2014, defendants ANTHONY POTTER and PARIS CHURCH discussed the availability of kilogram quantities of cocaine for purchase in New York City.
 7. On or about April 2, 2014, defendant ANTHONY POTTER contacted a car hauling service in Houston, Texas to arrange to have a car containing cocaine transported from Houston to a location on the East Coast for eventual transportation to Chester, Pennsylvania.
 8. On or about April 4, 2014, defendant PARIS CHURCH contacted the car hauling company and provided the company with the identifying information of the vehicle to be transported.
- On or about April 5, 2014:
9. Defendant PARIS CHURCH sent \$300 to defendant ANTHONY POTTER in Houston, Texas to help pay transportation expenses.
 10. Defendant ANTHONY POTTER met the truck responsible for hauling the car back to the East Coast and turned over a white Lincoln LS automobile containing

approximately 3 kilograms of cocaine secreted in a hidden compartment in the car.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**ANTHONY POTTER,
a/k/a "Mir"**

knowingly and intentionally distributed approximately 250 grams 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).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

PARIS CHURCH

knowingly and intentionally possessed with intent to distribute approximately 250 grams 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).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY POTTER,
a/k/a "Mir"**

knowingly and intentionally distributed approximately 250 grams 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).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PARIS CHURCH

knowingly and intentionally possessed with intent to distribute approximately 250 grams 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).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 31, 2014 in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH and
STEVEN MILLER**

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 125 grams of cocaine to defendant MILLER.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2014, in Perryville, in the District of Maryland,
defendant

PARIS CHURCH

knowingly and intentionally distributed approximately 125 grams 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).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2014, in Perryville, in the District of Maryland, defendant

STEVEN MILLER

knowingly and intentionally possessed with intent to distribute approximately 125 grams 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).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY POTTER,
a/k/a "Mir"**

knowingly and intentionally distributed 500 grams or more, that is, approximately 625 grams, 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).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PARIS CHURCH

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 625 grams, 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).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

PARIS CHURCH

knowingly and intentionally distributed approximately 300 grams 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).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

STEVEN MILLER

knowingly and intentionally possessed with intent to distribute approximately 300 grams 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).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2014 in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH, and
STEVEN MILLER**

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 MILLER used the telephone to discuss re-distributing the cocaine he had previously purchased from defendant CHURCH.

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2014, in Chester, in the Eastern District of Pennsylvania, and Houston, Texas, defendants

**PARIS CHURCH and
ANTHONY POTTER,
a/k/a "Mir,"**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 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), 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 18, United States Code, Sections 846, 841(a)(1), and 860 set forth in this indictment, defendants

**PARIS CHURCH,
ANTHONY POTTER,
a/k/a "Mir," and
STEVEN MILLER**

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.

2. 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**