

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO. _____**
v. : **DATE FILED: _____**
ANTONIO JEFFCOAT : **VIOLATIONS:**
: **18 U.S.C. § 1951(a) (robbery which**
: **interferes with interstate commerce -**
: **1 count)**
: **21 U.S.C. § 841(a)(1) (possession with**
: **intent to distribute a controlled substance**
: **- 1 count)**
: **18 U.S.C. § 924(c)(1) (using and carrying**
: **a firearm during and in relation to a**
: **crime of violence and a drug trafficking**
: **crime - 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The Rosica Pharmacy, 2065 Snyder Avenue, Philadelphia, Pennsylvania, was a business engaged in interstate commerce, providing for sale prescription drugs, medication, varied merchandise, and goods and services, some of which were produced and transported from outside the Commonwealth of Pennsylvania, and sold to residents of the Commonwealth of Pennsylvania.

2. On or about April 23, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTONIO JEFFCOAT

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, by unlawfully taking prescription drugs belonging to the Rosica Pharmacy, located at 2065 Snyder Avenue, Philadelphia, Pennsylvania, in the presence of employees of that business, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by brandishing a handgun, demanding drugs, and threatening the employees of the Rosica Pharmacy.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTONIO JEFFCOAT

knowingly and intentionally possessed with intent to distribute controlled substances, including, but not limited to, a mixture and substance containing a detectable amount of Oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of Codeine, 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 April 23, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTONIO JEFFCOAT

knowingly used and carried a firearm during and in relation to a crime of violence and a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this indictment, and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Two of this Indictment, and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation Title 21, United States Code, Section 841 set forth in this indictment, defendant

ANTONIO JEFFCOAT

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;

b. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property described in paragraph 2 above, 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 to, sold to, or deposited with a third party;

c. has been placed beyond the jurisdiction of this 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 intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the property, described in subparagraphs (a) through (e) of this paragraph.

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

A TRUE BILL:

GRAND JURY FOREPERSON

Peter F Schenck for
ZANE DAVID MEMEGER
UNITED STATES ATTORNEY