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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA : HON. ESTHER SALAS  
v. : **CRIMINAL COMPLAINT**  
SICOIYA ROSALEE ROBINSON : Magistrate No. 11-7041

I, David Brodie, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 27, 2011, at Newark Liberty International Airport, in the District of New Jersey and elsewhere, defendant SICOIYA ROSALEE ROBINSON:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

David Brodie  
Special Agent  
Department of Homeland Security, HSI

Sworn to before me and subscribed in my presence,

March 28, 2011 at Newark, New Jersey  
Date City and State

Honorable Esther Salas  
United States Magistrate Judge Signature of Judicial Officer

## ATTACHMENT A

did knowingly and willfully conspire and agree with others to commit offenses against the United States, that is, knowingly and intentionally import into the United States from a place outside thereof, namely Panama, 500 grams or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 952(a) and 960 (b)(2)(B),

in violation of Title 21, United States Code, Section 963.

## ATTACHMENT B

I, David Brodie, am a Special Agent of the Department of Homeland Security, Homeland Security Investigations. Based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the following facts:

1. On or about March 27, 2011, defendant SICOIYA ROSALEE ROBINSON arrived at Newark Liberty International Airport as a passenger traveling on board commercial flight number 886, which had departed from Panama City, Panama.

2. During the interview and baggage inspection process, Customs and Border Protection (“CBP”) discovered approximately 2.3 kilograms of a white powdery substance, which field-tested positive for the presence of cocaine, concealed in items of clothing defendant ROBINSON was transporting.

3. During a post-arrest interview, defendant ROBINSON stated, in substance and in part, that she had been hired to travel to Panama for the purpose of transporting a controlled substance into the United States. She further stated, in substance and in part, that she was provided with the items of clothing containing cocaine by other persons while she was in Panama and she had knowingly carried the controlled substance onto flight number 886.