2013R00307/NPG

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
ROBERT BRITT,	:	21 U.S.C. § 846
a/k/a "True"	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Trenton, charges:

1. From in or about 2010 through in or about March 2014, in Monmouth and Ocean Counties, in the District of New Jersey, and elsewhere, the defendant,

ROBERT BRITT,
a/k/a "True,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute one hundred grams or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

2. At all times relevant to the Indictment, defendant ROBERT BRITT, a/k/a "True" ("BRITT"), resided in or around Asbury Park, New Jersey, or was incarcerated in state correctional facilities in New Jersey, and was a supplier of heroin and other narcotics to various drug dealers and end users in Monmouth and Ocean Counties.

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to distribute heroin in Ocean and Monmouth Counties and elsewhere for profit.

MANNER AND MEANS OF THE CONSPIRACY

4. The manner and means by which BRITT and his co-conspirators sought to accomplish the conspiracy included, among other things, the following:

a. It was part of the conspiracy that BRITT obtained large quantities of heroin from an individual located in New York City (the "NYC Supplier") and sold the heroin to individuals in various parts of New Jersey, including other narcotics dealers and end users.

b. It was further part of the conspiracy that BRITT "fronted" heroin to other dealers, meaning he gave it to them without collecting payment up front, and then those dealers sold the heroin and used the proceeds to pay BRITT.

c. It was further part of the conspiracy that BRITT used various hotel rooms and apartments to store, process, and package heroin to prepare it for distribution to others.

d. It was further part of the conspiracy that BRITT and his co-conspirators used numerous cellular telephones to communicate in furtherance of the narcotics conspiracy and that they used code language to discuss drug transactions. Those communications included requests for specific types of narcotics and quantities of such narcotics. The code language was designed to conceal the illegal nature of the subject matter of those conversations.

e. It was further part of the conspiracy that, prior to going to prison in or around April 2013, BRITT arranged to transfer the day-to-day operations of his narcotics distribution business to one of his principal co-conspirators, Rufus Young ("Young"). In particular, BRITT transferred certain heroin customers to Young and assisted Young in arranging and maintaining steady sources of supply, including the NYC Supplier.

f. It was further part of the conspiracy that, while in prison, BRITT maintained a hands-on role in the heroin distribution business. Specifically, BRITT spoke with Young about their heroin business using a concealed contraband cell phone that BRITT maintained in violation of prison rules and regulations. During those conversations, BRITT instructed Young on how to operate their drug business. In particular, BRITT provided Young with methods for developing new heroin customers, avoiding detection by law enforcement, using trusted lower-level co-conspirators to assist in distributing the heroin – a practice that BRITT referred to as the "chain of command" – and establishing new sources of supply. For example, during his term of incarceration, BRITT put Young in touch with a new heroin supplier that BRITT previously had met in prison. BRITT facilitated a meeting between Young and the potential supplier in Newark, New Jersey in early January 2014.

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

FORFEITURE ALLEGATION

1. The allegations contained in the Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 924(d), and 28 U.S.C. § 2461.

2. Upon conviction of the offense set forth in this Indictment, the defendant,

ROBERT BRITT,
a/k/a "True,"

shall forfeit to the United States all property, real or personal, that constitutes or is derived from proceeds traceable to violations of 21 U.S.C. §§ 841(a)(1), 846 and 843(b) which constitute a specified unlawful activity within the meaning of 18 U.S.C. § 981(a)(1)(C).

Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

____
FOREPERSON

Paul J. Fishman

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: ____________

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ROBERT BRITT,
a/k/a "True"

INDICTMENT FOR

21 U.S.C. § 846

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