

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA)

-vs-)

TREVOR RAEKWON SEWARD)
JEROME TERRELL DAVIS)
RICKY JESUS ROCHA BARAJAS)

CR No.: 4:20-cr- **512**

18 USC § 2
18 USC § 922(g)(1)
18 USC § 924(a)(2)
18 USC § 924(c)(1)
18 USC § 924(c)(1)(A)(iii)
18 USC § 924(e)
18 USC § 924(j)(1)
18 USC § 1111
18 USC § 1114
18 USC § 1951
21 USC § 841(a)(1)
21 USC § 841(b)(1)(D)
21 USC § 843(b)
21 USC § 846

INDICTMENT

COUNT 1

THE GRAND JURY FURTHER CHARGES:

That on or about September 23, 2019, in the District of South Carolina, the Defendants, **TREVOR RAEKWON SEWARD and JEROME TERRELL DAVIS**, did, with premeditation and malice aforethought, unlawfully kill I.P., a mail carrier for the United States Postal Service, while I.P. was engaged in and on account of the performance of her official duties;

In violation of Title 18, United States Code, Sections 1114, 1111 and 2.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about September 23, 2019, in the District of South Carolina, the Defendant, **TREVOR RAEKWON SEWARD**, knowingly did use and carry a firearm during and in relation to, and did possess a firearm in furtherance of, a crime of violence, as charged in Count 1, which is prosecutable in a court of the United States, and, did cause the death of a person through the use of a firearm in such a manner to constitute murder as defined in Title 18, United States Code, Section 1111, in that **TREVOR RAEKWON SEWARD** with malice aforethought did unlawfully kill a person by shooting her with a firearm;

In violation of Title 18, United States Code, Sections 924(c)(1), 924(c)(1)(A)(iii) and 924(j)(1).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about September 23, 2019, in the District of South Carolina, the Defendants, **TREVOR RAEKWON SEWARD and JEROME TERRELL DAVIS**, knowingly and unlawfully did obstruct, delay, affect, and attempt to affect commerce and the movement of articles and commodities in such commerce by robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully obstruct, delay and affect the delivery of United States mail, by means of actual and threatened force, violence and fear of injury to I.P.;

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That On or about September 23, 2019, in the District of South Carolina, the defendant, **TREVOR RAEKWON SEWARD**, knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Double Star Corporation Model Star-15 5.56 caliber rifle and .223 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(e).

COUNT 5

THE GRAND JURY CHARGES:

That beginning at a time unknown to the grand jury, but at least in or around September 2019, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **TREVOR RAEKWON SEWARD, JEROME TERRELL DAVIS, and RICKY JESUS ROCHA BARAJAS**, knowingly and intentionally did combine, conspire and agree and have tacit understanding with each other and others, both known and unknown to the grand jury, to possess with intent to distribute and distribute marijuana, a Schedule I controlled substance:

- a. With respect to **TREVOR RAEKWON SEWARD**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of marijuana in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);

- b. With respect to **JEROME TERRELL DAVIS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of marijuana in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);
- c. With respect to **RICKY JESUS ROCHA BARAJAS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of marijuana in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);

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

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about September 23, 2019, in the District of South Carolina, the Defendants, **JEROME TERRELL DAVIS and RICKY JESUS ROCHA BARAJAS**, knowingly and intentionally did use a communication facility, that is, a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to distribute and possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846;

All in violation of Title 21, United States Code, Section 843(b)

**NOTICE OF SPECIAL FINDINGS PURSUANT TO TITLE 18, UNITED STATES
CODE, SECTIONS 3591 AND 3592**


THE GRAND JURY FURTHER FINDS:

1. As to Counts 1 and 2, Defendants TREVOR RAEKWON and SEWARD JEROME
TERRELL DAVIS:

- a. Were 18 years of age or older at the time of the offense;
- b. Intentionally killed I.P. (18 U.S.C. § 3591(a)(2)(A));
- c. Intentionally inflicted seriously bodily injury that resulted in the death of I.P.
(18 U.S.C. § 3591(a)(2)(B));
- d. Intentionally participated in an act, contemplating that the life of a person would
be taken and intending that lethal force would be used in connection with a
person, other than one of the participants in the offense, and I.P. died as a direct
result of such act (18 U.S.C. § 3591(a)(2)(C)); and
- e. Intentionally and specifically engaged in an act of violence, knowing that the
act created a grave risk of death to a person, other than one of the participants
in the offense, such that participation in the act constituted a reckless disregard
for human life and I.P. died as a result of the act (18 U.S.C. § 3591(a)(2)(D));

A TRUE BILL

FOREPERSON


PETER M. McCOY, JR. (nb)
UNITED STATES ATTORNEY

RECORD OF GRAND JURY BALLOT

C/ 4:20-512

THE UNITED STATES OF AMERICA v. TREVOR RAEKWON SEWARD, ET AL.

(SEALED UNTIL FURTHER ORDER OF THE COURT)