

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
PARIS CHURCH,	:	VIOLATIONS:
a/k/a "Pay,"		21 U.S.C. § 846 (conspiracy to possess with
a/k/a "Derek Davis,"	:	intent to distribute 5 kilograms or more
a/k/a "Dereck Davis,"		of cocaine - 1 count)
DONALD WOMACK, SR.,	:	Notice of forfeiture
a/k/a "Rock,"		
NATHANIEL DA-MEIR COLES,	:	
a/k/a "Daz,"		
a/k/a "D,"	:	
MICHAEL PINKNEY		

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about January 27, 2014, through in or around February, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

PARIS CHURCH,
 a/k/a "Pay,"
 a/k/a "Derek Davis,"
 a/k/a "Dereck Davis,"
DONALD WOMACK, SR.,
 a/k/a "Rock,"
NATHANIEL DA-MEIR COLES,
 a/k/a "Daz,"
 a/k/a "D," and
MICHAEL PINKNEY

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to 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)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant DONALD WOMACK, SR. was associated with "Daniel," a person in Mexico, unknown to the grand jury, who was able to supply multiple kilograms of cocaine.
3. Defendant DONALD WOMACK, SR. introduced defendants PARIS CHURCH and NATHANIEL COLES to "Daniel" in order for them to purchase multiple kilograms of cocaine.
4. Defendants PARIS CHURCH and NATHANIEL COLES exchanged telephone calls and text messages with "Daniel" in order to negotiate the purchase of 18 kilograms of cocaine.
5. "Daniel" agreed to smuggle 18 kilograms of cocaine into the United States from Mexico for sale to defendants PARIS CHURCH, DONALD WOMACK, SR., NATHANIEL COLES, and MICHAEL PINKNEY.
6. Defendants PARIS CHURCH and MICHAEL PINKNEY agreed to travel to Houston, Texas, to complete the cocaine purchase.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants PARIS CHURCH, DONALD WOMACK, SR., NATHANIEL COLES, and MICHAEL PINKNEY and "Daniel" committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about January 27, 2014:

1. Defendant DONALD WOMACK, SR. provided defendant PARIS CHURCH with the name and contact information for defendant WOMACK, SR.'s Mexican cocaine source of supply, "Daniel."

2. Defendant NATHANIEL COLES communicated with "Daniel" to make sure "Daniel" called defendant PARIS CHURCH to discuss purchasing cocaine.

3. Defendant PARIS CHURCH and "Daniel" discussed defendant CHURCH's desire to purchase multiple kilograms of cocaine. "Daniel" agreed to sell defendant CHURCH 18 to 20 kilograms of cocaine.

4. Defendant MICHAEL PINKNEY agreed to travel to Houston, Texas with defendant PARIS CHURCH to accept delivery of the cocaine and make the payment to "Daniel."

On or about January 29, 2014:

5. "Daniel" called defendant PARIS CHURCH and gave him the name of "Mario Casteneda" and the location of Kingsville, Texas, to send the driver's expense money by way of Western Union.

6. Using the name "Dereck Davis" as the supposed sender, and the name "Mario Casteneda" as the intended recipient, defendant PARIS CHURCH wired \$300, by way of Western Union, to "Daniel," to help pay expenses for the driver who was to transport the cocaine across the Mexican-United States border.

7. In a Western Union location in Kingsville, Texas, a person unknown to the grand jury picked up the \$300 payment wired to "Daniel" in the sender's name of "Dereck Davis" and in the intended recipient's name of "Mario Casteneda."

8. Defendant MICHAEL PINKNEY advised defendants PARIS CHURCH and DONALD WOMACK, SR. that defendant PINKNEY had obtained information about renting a Recreational Vehicle ("RV") to be used to travel to Texas to accept delivery of the cocaine from "Daniel."

9. On or about January 31, 2014, Daniel called defendant PARIS CHURCH to inform him that the transport car was almost ready and he expected to cross the border with the drugs that day.

On or about February 1, 2014:

10. Defendant DONALD WOMACK agreed to have defendant NATHANIEL COLES contact "Daniel" to determine "Daniel's" whereabouts.

11. "Daniel" texted defendant NATHANIEL COLES that he ("Daniel") would arrive in Houston with the drugs on February 2, 2014.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 21, United States Code, Section 846 set forth in this indictment, defendants

**PARIS CHURCH,
a/k/a "Pay,"
a/k/a "Derek Davis,"
a/k/a "Dereck Davis,"
DONALD WOMACK, SR.,
a/k/a "Rock,"
NATHANIEL DA-MEIR COLES,
a/k/a "Daz,"
a/k/a "D," and
MICHAEL PINKNEY,**

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:

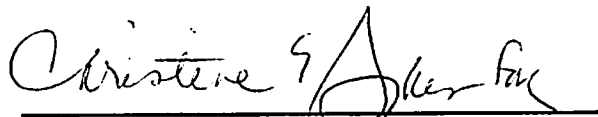
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot 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