

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 03-</b>
	:	
<b>v.</b>	:	<b>DATE FILED: <u>December 17, 2003</u></b>
	:	
<b>ROBINSON DELORBE,</b>	:	<b>21 U.S.C. § 846 (Conspiracy to</b>
<b>a/k/a “247,”</b>	:	<b>distribute and to possess with</b>
<b>a/k/a “Nino,”</b>	:	<b>the intent to distribute heroin</b>
<b>a/k/a “Don,” and</b>	:	<b>- 1 count)</b>
<b>NINOSKA KALAF</b>	:	
	:	<b>21 U.S.C. § 841(a)(1) (Distribution of</b>
	:	<b>and possession with the intent to</b>
	:	<b>distribute heroin</b>
	:	<b>- 4 counts)</b>
	:	
	:	<b>18 U.S.C. § 2 (Aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about July 2003 through in or about September 2003, at Philadelphia, in the Eastern District of Pennsylvania, the defendants

**ROBINSON DELORBE,  
a/k/a “247,”  
a/k/a “Nino,”  
a/k/a “Don,”  
and  
NINOSKA KALAF**

conspired and agreed together and with others known and unknown to the grand jury to knowingly and intentionally distribute and possess with the intent to distribute more than 100 grams, that is approximately 433 grams, of a mixture or substance containing a detectable

amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B).

**MANNER AND MEANS**

2. Defendants ROBINSON DELORBE and NINOSKA KALAF distributed heroin during the life of the conspiracy in and around Philadelphia, Pennsylvania.

3. Defendants ROBINSON DELORBE and NINOSKA KALAF communicated with each other regarding the distribution of heroin.

4. Defendants ROBINSON DELORBE and NINOSKA KALAF made arrangements between each other regarding where and how the heroin would be acquired and distributed.

**OVERT ACTS**

In furtherance of the conspiracy, and in order to accomplish its objects, the following overt acts, among others, were performed by defendants and others known and unknown to the grand jury in the Eastern District of Pennsylvania and elsewhere:

1. At all relevant times, defendants ROBINSON DELORBE and NINOSKA KALAF resided together with their minor children at 3553 Frankford Avenue, Philadelphia, PA.

2. On or about August 19, 2003, at Philadelphia:

a. Defendant ROBINSON DELORBE arranged to deliver approximately 20 grams of heroin to a witness cooperating with the government (the "CW").

b. Pursuant to the prior arrangement between defendant ROBINSON DELORBE and the CW, DELORBE met and conferred with the CW at a pre-arranged meeting place to deliver the heroin.

c. While defendant ROBINSON DELORBE and the CW were conferring, defendant NINOSKA KALAF, on behalf of DELORBE, transferred approximately 20.5 grams of heroin into the CW's vehicle.

3. On or about August 29, 2003, at Philadelphia:

a. Defendant ROBINSON DELORBE and the CW arranged to meet at a pre-arranged location in Philadelphia.

b. Defendant ROBINSON DELORBE delivered to the CW approximately 0.36 grams of heroin.

4. In the days leading up to September 25, 2003, at Philadelphia, defendant ROBINSON DELORBE and the CW arranged to meet at a pre-arranged location in Philadelphia for DELORBE to deliver approximately 400 grams of heroin to the CW.

5. On or about September 24, 2003, defendant NINOSKA KALAF went to New York, took delivery of approximately 400 grams of heroin from a supplier, and brought the heroin back to Philadelphia.

6. On or about September 25, 2003, at Philadelphia:

a. Pursuant to the prior arrangement between defendant ROBINSON DELORBE and the CW, DELORBE met the CW at the pre-arranged location to deliver the heroin.

b. Defendant ROBINSON DELORBE and the CW began to negotiate over the price, weight, and quality of the heroin.

c. Defendant ROBINSON DELORBE and the CW entered a store open to the public. Defendant NINOSKA KALAF was standing outside the store with an infant inside a

child's car seat. Inside the store, DELORBE took the CW into an enclosed area. DELORBE then left the store and met with KALAF.

d. Defendant ROBINSON DELORBE and defendant NINOSKA KALAF entered the store, with KALAF carrying the infant in the car seat. DELORBE and KALAF joined the CW in the enclosed area and showed the CW where the heroin was stored, which was underneath the infant in the car seat. The heroin in the package stored underneath the infant weighed approximately 392.5 grams.

e. Defendant NINOSKA KALAF had an additional 19.7 grams of heroin in her pocket.

f. Inside their residence, defendant ROBINSON DELORBE and defendant NINOSKA KALAF stored drug packaging paraphernalia, other drug paraphernalia, and an additional amount of heroin.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 19, 2003, at Philadelphia, in the Eastern District of Pennsylvania,  
the defendants

**ROBINSON DELORBE,  
a/k/a "247,"  
a/k/a "Nino,"  
a/k/a "Don,"  
and  
NINOSKA KALAF**

did knowingly and intentionally distribute, and did aid and abet in the distribution of, a mixture  
or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 29, 2003, at Philadelphia, in the Eastern District of Pennsylvania,  
the defendant

**ROBINSON DELORBE,  
a/k/a "247,"  
a/k/a "Nino,"  
a/k/a "Don,"**

did knowingly and intentionally distribute a mixture or substance containing a detectable amount  
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 25, 2003, at Philadelphia, in the Eastern District of Pennsylvania, the defendants

**ROBINSON DELORBE,  
a/k/a "247,"  
a/k/a "Nino,"  
a/k/a "Don,"  
and  
NINOSKA KALAF**

did knowingly and intentionally possess with the intent to distribute, and did aid and abet in the possession with the intent to distribute of, more than 100 grams, that is approximately 392.5 grams, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 25, 2003, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**NINOSKA KALAF**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**