

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-041
v.	:	DATE FILED: March 11, 2008
SEAN ROGERS, a/k/a "S.P.,"	:	VIOLATIONS:
ANNA BAEZ	:	21 U.S.C. § 846 (conspiracy to distribute
DAWN SCOTT	:	50 grams or more of cocaine base
OLIVER SIMS, a/k/a "Neefe,"	:	("crack") - 2 counts)
KARUAN GOLDSBERRY, a/k/a "K-Boogie,"	:	18 U.S.C. § 924(c) (possession of a firearm
MARIO RIVERA, a/k/a "Bodie,"	:	in furtherance of a drug trafficking crime
CLARENCE MICHAEL CURRY, a/k/a "Angry Mike,"	:	- 1 count)
JOHN JAUDON	:	18 U.S.C. § 922(g)(1) (convicted felon in
DAVID TULLER, a/k/a "Skulls,"	:	possession of a firearm - 1 count)
JONATHAN WHITE, a/k/a "Jay,"	:	21 U.S.C. § 841(a)(1) (possession with
JULIAN JOSEPH, a/k/a "Rude Boy,"	:	intent to distribute 5 grams or more of
JOSEPH KELLY, a/k/a "Kels,"	:	cocaine base ("crack") - 33 counts)
CLARENCE PASCAL, a/k/a "Rel,"	:	21 U.S.C. § 841(a)(1) (possession with
JOSH OLIVER	:	intent to distribute cocaine base ("crack")
TIMOTHY BOWERS	:	- 76 counts)
KENDALL KINCHEN	:	21 U.S.C. § 860(a) (distribution of 5
		grams of more of cocaine base ("crack")
		within 1,000 feet of a school - 1 count)
		18 U.S.C. §2 (aiding and abetting)
		Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about June, 2007 to January, 2008, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**SEAN ROGERS,
a/k/a “S.P.,” and
ANNA BAEZ**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more, that is, at least 15 kilograms, of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

It was part of the conspiracy that from in or about June 2007, up to on or about January 23, 2008:

2. Defendant SEAN ROGERS operated a crack cocaine distribution organization referred to in this indictment as the S-P Crack Distribution Organization (“SPCO”), which was organized and managed by defendant ROGERS, who also goes by the name “S.P.” The SPCO sold at least 15 kilograms of cocaine base (“crack”) in wholesale quantities to other drug dealers, including members of the “Bloods” gang, in and around Easton in the Eastern District of Pennsylvania.

3. At least once a week during the conspiracy, defendant SEAN ROGERS obtained cocaine and crack cocaine in one-half kilogram quantities from a supplier known to the grand jury in New York City in the Southern District of New York, which defendant ROGERS transported to Easton for distribution by himself and, on occasion, with defendant ANNA BAEZ, his common-law wife.

4. Defendants SEAN ROGERS and ANNA BAEZ stored the cocaine and crack cocaine received from their supplier at their home in Easton, where together they packaged

it for sale to customers of the SPCO.

5. Defendants SEAN ROGERS and ANNA BAEZ delivered crack cocaine to numerous regular customers in quantities ranging from one-eighth of an ounce (“eightballs”) up to one ounce (approximately 28 grams). These customers then repackaged the crack cocaine for sale to their own customers at the street-level in Easton, Pennsylvania and elsewhere.

6. Defendants SEAN ROGERS and ANNA BAEZ regularly sold crack cocaine to a number of customers, including but not limited to, Oliver Sims, Karuan Goldsberry, Mario Rivera, Clarence Michael Curry, John Jaudon, David Tuller, Jonathan White, Julian Joseph, Joseph Kelly, Clarence Pascal, and Josh Oliver, all charged elsewhere.

7. Defendants SEAN ROGERS and ANNA BAEZ received telephone orders of crack cocaine from each of the customers listed in Overt Act # 6, and others known and unknown to the grand jury. Defendants ROGERS and BAEZ made deliveries of the ordered crack cocaine to their customers and were paid in cash by their customers.

8. Defendants SEAN ROGERS and ANNA BAEZ possessed firearms at their Easton home to protect their drug activities and proceeds.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, defendants SEAN ROGERS and ANNA BAEZ committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 21, 2007, defendant SEAN ROGERS sold approximately 5.0 grams of crack cocaine in Easton, Pennsylvania.
2. On or about July 7, 2007, defendant SEAN ROGERS sold approximately 17.8 grams of crack cocaine to a customer, who paid him approximately \$1,000 in cash, in Easton, Pennsylvania.
3. On or about July 24, 2007, defendants SEAN ROGERS and ANNA BAEZ sold approximately 20.2 grams of crack cocaine to a customer, who paid defendant ROGERS approximately \$1,000 in cash, in Easton, Pennsylvania.
4. On or about August 1, 2007, defendants SEAN ROGERS and ANNA BAEZ sold approximately 24.2 grams of crack cocaine to a customer, who paid defendant ROGERS approximately \$1,000 in cash, in Easton, Pennsylvania.
5. On or about August 7, 2007, defendants SEAN ROGERS and ANNA BAEZ sold approximately 23.9 grams of crack cocaine to a customer, who paid defendant ROGERS approximately \$1,000 in cash, in Easton, Pennsylvania.
6. On or about August 14, 2007, defendants SEAN ROGERS and ANNA BAEZ sold approximately 23.5 grams of crack cocaine to a customer, who paid defendant ROGERS approximately \$1,000 in cash, in Easton, Pennsylvania.

7. On or about September 4, 2007, defendant SEAN ROGERS sold approximately 23.6 grams of crack cocaine to a customer, who paid him approximately \$1,000 in cash, in Easton, Pennsylvania.

8. On or about September 25, 2007, defendant SEAN ROGERS sold approximately 23.2 grams of crack cocaine to a customer, who paid him approximately \$1,000 in cash, in Easton, Pennsylvania.

9. On or about October 9, 2007, defendant SEAN ROGERS sold approximately 23.9 grams of crack cocaine to a customer, who paid him approximately \$1,000 in cash, in Easton, Pennsylvania.

10. On or about October 18, 2007, defendant SEAN ROGERS sold approximately 11.5 grams of crack cocaine to a customer, who paid him approximately \$500 in cash, in Easton, Pennsylvania.

11. On or about October 22, 2007, defendant SEAN ROGERS sold approximately 28 grams of crack cocaine to a customer, who paid defendant ROGERS approximately \$965 in cash, in Easton, Pennsylvania.

12. On or about October 25, 2007, defendant SEAN ROGERS possessed for distribution approximately 500 grams of crack cocaine in New York City and Easton, Pennsylvania.

13. On or about October 31, 2007, defendants SEAN ROGERS and ANNA BAEZ possessed for distribution approximately 14 grams of crack cocaine in Easton, Pennsylvania.

14. On or about November 13, 2007, defendants SEAN ROGERS and ANNA BAEZ possessed for distribution approximately 21 grams of crack cocaine in Easton, Pennsylvania.

15. On or about November 13, 2007, defendants SEAN ROGERS and ANNA BAEZ possessed two firearms in Easton, Pennsylvania.

16. On or about November 24, 2007, defendant SEAN ROGERS possessed for distribution approximately 300 grams of crack cocaine and 100 grams of cocaine in New York City and Easton, Pennsylvania.

On or about November 28, 2007:

17. Defendant SEAN ROGERS possessed for distribution approximately one kilogram of crack cocaine in Easton, Pennsylvania.

18. Defendants SEAN ROGERS and ANNA BAEZ sold approximately 10 grams of crack cocaine to a customer in Easton, Pennsylvania.

19. On or about December 15, 2007, defendant SEAN ROGERS sold approximately 18 grams of crack cocaine to a customer in Easton, Pennsylvania.

20. On or about January 4, 2007, defendant SEAN ROGERS sold approximately 14 grams of crack cocaine to a customer in Easton, Pennsylvania.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 23, 2008, in Easton, in the Eastern District of Pennsylvania,
defendant

SEAN ROGERS

knowingly possessed a firearm, that is, a Browning .380 caliber pistol, Model BDA-380, with serial number PY-10784, loaded with eight rounds of live ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 23, 2008, in Easton, in the Eastern District of Pennsylvania,
defendant

SEAN ROGERS,

having been convicted in a court of the State of New York of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Browning .380 caliber pistol, Model BDA-380, with serial number PY-10784, loaded with eight rounds of live ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about a date unknown to the grand jury, beginning at least in or about January 2006, until in or about December 2006, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN SCOTT

conspired and agreed, with Sean Rogers, charged elsewhere in this superseding indictment, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more, that is, at least 18 kilograms, of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

It was part of the conspiracy that from in or about January 2006 up to and including about December 2006:

2. On a weekly basis, defendant DAWN SCOTT, Sean Rogers, and others known and unknown to the grand jury, purchased approximately 500 grams of crack cocaine from a supplier known to the grand jury.

3. Defendant DAWN SCOTT, Sean Rogers, and others known and unknown to the grand jury communicated by telephone with their customers to arrange the sale of crack cocaine, typically in one-eighth ounce quantities referred to as “eightballs.” Defendant SCOTT and Rogers then delivered the ordered crack cocaine to their customers and were paid in cash.

4. During the conspiracy, defendant DAWN SCOTT and Sean Rogers sold at least 19 kilograms of crack cocaine to their customers.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, defendant DAWN SCOTT, Sean Rogers, and others, known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 13, 2006, defendant DAWN SCOTT and Sean Rogers sold approximately 28 grams of crack cocaine to a customer.

2. On or about February 9, 2006, defendant DAWN SCOTT and Sean Rogers sold approximately 14 grams of crack cocaine to a customer within 1,000 feet of the Easton Catholic School, a parochial elementary school, located at 283 West Saint Joseph's Street in Easton, Pennsylvania.

3. On or about March 5, 2006, defendant DAWN SCOTT and Sean Rogers sold approximately 28 grams of crack cocaine to a customer.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2005, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN SCOTT

knowingly and intentionally possessed with intent to distribute, and aided and abetted, the possession with intent to distribute of, 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2006, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN SCOTT

knowingly and intentionally possessed with intent to distribute, and aided and abetted, the possession with intent to distribute of, 5 grams or more, that is, approximately 28 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2006, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN SCOTT

knowingly and intentionally possessed with intent to distribute, and aided and abetted, the possession with intent to distribute of, 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2006 , in Easton, in the Eastern District of Pennsylvania,
defendant

DAWN SCOTT

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Easton Catholic School, a parochial elementary school, located at 283 West Saint Joseph’s Street in Easton, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 5, 2006, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN SCOTT

knowingly and intentionally possessed with intent to distribute, and aided and abetted, the possession with intent to distribute of 5 grams or more, that is, approximately 28 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**OLIVER SIMS,
a/k/a “Neefe,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**OLIVER SIMS,
a/k/a "Neefe,"**

knowingly and intentionally possessed with intent to distribute, 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**OLIVER SIMS,
a/k/a “Neefe,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**OLIVER SIMS,
a/k/a "Neefe,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KARUAN GOLDSBERRY,
a/k/a "K-Boogie,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 19, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a "Bodie,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 10 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a “Bodie,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a "Bodie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a “Bodie,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a “Bodie,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a “Bodie,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**MARIO RIVERA,
a/k/a "Bodie,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 27, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 30, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 4, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2007, at approximately 10:59 a.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2007, at approximately 3:06 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE MICHAEL CURRY,
a/k/a "Angry Mike,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2007, at approximately 5:57 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2007, at approximately 11:10 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN JAUDON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a “Skulls,”**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a “Skulls,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SIXTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 6, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a “Skulls,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a “Skulls,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SIXTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SIXTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID TULLER,
a/k/a “Skulls,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SEVENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID TULLER,
a/k/a "Skulls,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JONATHAN WHITE,
a/k/a "Jay,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 1, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JONATHAN WHITE,
a/k/a "Jay,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JONATHAN WHITE,
a/k/a "Jay,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JONATHAN WHITE,
a/k/a "Jay,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT SEVENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JULIAN JOSEPH,
a/k/a "Rude Boy,"
a/k/a "Rudy,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JOSEPH KELLY,
a/k/a "Kels,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 23, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JOSEPH KELLY,
a/k/a "Kels,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 27, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JOSEPH KELLY,
a/k/a "Kels,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JOSEPH KELLY,
a/k/a "Kels,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 11 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**JOSEPH KELLY,
a/k/a "Kels,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2007, at approximately 11:00 a.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2007, in Easton, at approximately 6:37 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 21 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINETY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**CLARENCE PASCAL,
a/k/a "Rel,"**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOSH OLIVER

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOSH OLIVER

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 19, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 27, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMOTHY BOWERS

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT ONE-HUNDRED AND FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2007, in Easton, in the Eastern District of Pennsylvania,
and elsewhere, defendant

KENDALL KINCHEN

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

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 superseding indictment, defendants

**SEAN ROGERS,
a/k/a "S.P.," and
ANNA BAEZ**

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 including but not limited to:

- (i) at least \$540,000;
- (ii) Plymouth Voyager minivan (PA registration GPD5115);
- (ii) Honda automobile (PA registration GPK8427);
- (iii) Lexus automobile (PA registration GRP7668); and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

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:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney