

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

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|---------------------------------|----------|---------------------|--|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. | _____ |
| | : | | |
| v. | : | DATE FILED: | _____ |
| | : | | |
| CRAIG LINDSEY | : | VIOLATIONS: | 21 U.S.C. § 841(a)(1) (distribution of cocaine - 2 counts) 21 U.S.C. § 841(a)(1) (possession with the intent to distribute cocaine base (“crack”) - 1 count) 21 U.S.C. § 841(a)(1) (possession with the intent to distribute cocaine - 1 count) 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking offense - 1 count) 18 U.S.C. § 922(g)(1) (felon in possession of a firearm - 1 count) Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY

knowingly and intentionally distributed approximately 18.64 grams 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)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY

knowingly and intentionally distributed approximately 17.14 grams 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)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 16.6 grams, of a mixture or 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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY

knowingly and intentionally possessed with intent to distribute approximately 485.5 grams of a mixture
or 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)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY

knowingly possessed a firearm, that is, a Ruger P97DC, .45 caliber semi-automatic firearm, serial number 663-45991, loaded with 8 live rounds, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

_____ On or about September 1, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CRAIG LINDSEY,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting commerce, a firearm, that is, a Ruger P97DC, .45 caliber semi-automatic firearm, serial number 663-45991, loaded with 8 live rounds.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

CRAIG LINDSEY

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; a Ruger P97DC, .45 caliber semi-automatic firearm, serial number 663-45991, loaded with 8 live rounds; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$12,082 United States currency.

2. If any of the property subject to forfeiture, 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 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 defendant(s) 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

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**