

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. : 08-\_\_\_\_\_**

**v.** : **DATE FILED: \_\_\_\_\_**

**SHAWN DANIELS** : **VIOLATION:**

: **21 U.S.C. § 841(a)(1), (b)(1)(C) (possession**

: **with intent to distribute cocaine - 1 count)**

: **26 U.S.C. § 5861(d) (possession of an**

: **unregistered sawed off shotgun - 1 count)**

: **18 U.S.C. § 924(c) (possession of a firearm**

: **in furtherance of drug trafficking -**

: **1 count)**

: **18 U.S.C. § 922(g)(1) (convicted felon in**

: **possession of firearm - 1 count)**

: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about June 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHAWN DANIELS**

knowingly and intentionally possessed with intent to distribute 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 June 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHAWN DANIELS**

knowingly possessed a firearm, as defined in Title 26, United States Code, Section 5845(a)(2), that is, a shotgun with an overall length of less than 26 inches, that is, a Savage Arms, Model JC Higgins sawed off shotgun with an unknown serial number, loaded with two live rounds of ammunition, which was not registered to the defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5845(a)(2), 5861(d), and 5871.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHAWN DANIELS**

knowingly and intentionally possessed firearms, that is: (1) a Norinco Model Sporter, 7.62-caliber rifle, serial number BWB104077, loaded with a magazine and twenty-three live rounds of ammunition; (2) a Pac West Model Commando, .223-caliber rifle, serial number 22261, loaded with a magazine and ten live rounds of ammunition; and (3) a short-barreled shotgun, as defined in Title 18, United States Code, Section 922(a)(6), that is a Savage Arms, Model JC Higgins sawed-off shotgun measuring less than 26 inches in overall length with an unknown serial number, loaded with two live rounds of ammunition, in furtherance of a crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHAWN DANIELS,**

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 interstate and foreign commerce firearms, that is, (a) a Norinco Model Sporter, 7.62-caliber rifle, serial number BWB104077, loaded with a magazine and twenty-three live rounds of ammunition; (b) a Pac West Model Commando, .223-caliber rifle, serial number 22261, loaded with a magazine and ten live rounds of ammunition; and (c) a Savage Arms, Model JC Higgins sawed-off shotgun measuring less than 26 inches in overall length with an unknown serial number, loaded with two live rounds of ammunition.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 922(g)(1), and 924(c), and Title 26, United States Code, Sections 5845(a), 5861(d) and 5871 set forth in this indictment, defendant

**SHAWN DANIELS**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of such offenses including, but not limited to (a) a Norinco Model Sporter, 7.62-caliber rifle, serial number BWB104077, loaded with a magazine and twenty-three live rounds of ammunition; (b) a Pac West Model Commando, .223-caliber rifle, serial number 22261, loaded with a magazine and ten live rounds of ammunition; and (c) a Savage Arms, Model JC Higgins sawed off shotgun measuring less than 26 inches in overall length with an unknown serial number, loaded with two live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 924(d), and Title 26, United States Code, Section 5872.

**A TRUE BILL:**

**FOREPERSON**

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