

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08 - _____
v.	:	DATE FILED: March 11, 2008
RALICK COLE,	:	VIOLATIONS:
a/k/a "Buck,"	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Buckshot,"	:	50 grams or more of cocaine base
DORIAN RAWLINSON,	:	("crack") - 1 count)
a/k/a "Pee,"	:	21 U.S.C. § 841(a)(1) (possession with
KASEEM DOBSON,	:	intent to distribute 5 grams or more of
a/k/a "Strole"	:	cocaine base ("crack") - 5 counts)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine base ("crack")
	:	- 1 count)
	:	21 U.S.C. § 843(b) (use of a
	:	communications facility to facilitate the
	:	possession with intent to distribute
	:	cocaine base ("crack") - 7 counts)
	:	18 U.S.C. §2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about a date unknown to the grand jury, beginning at least in or about January 2007, until in or about January, 2008, in Easton, in the Eastern District of Pennsylvania, Phillipsburg, in the District of New Jersey, and elsewhere, defendants

RALICK COLE,
 a/k/a "Buck,"
 a/k/a "Buckshot,"
DORIAN RAWLINSON,
 a/k/a "Pee,"
KASEEM DOBSON,
 a/k/a "Strole"

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 2.5 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 2007 up to and including about January 2008.

2. On a weekly basis, defendants RALICK COLE, DORIAN RAWLINSON, and KASEEM DOBSON, worked together to distribute at least two ounces of crack cocaine from Sean Rogers, charged elsewhere, in Easton, Pennsylvania.

3. Approximately four days of each week, defendants RALICK COLE, DORIAN RAWLINSON, and KASEEM DOBSON contacted Sean Rogers by telephone and placed orders for crack cocaine, which was received and paid for by either defendants COLE, RAWLINSON, DOBSON, or a combination of the defendants together. Defendants COLE, RAWLINSON, and DOBSON then sold the crack cocaine to their customers in Phillipsburg New Jersey area, and elsewhere.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, defendants RALICK COLE, DORIAN RAWLINSON, and KASEEM DOBSON committed the following overt acts, among others, in Easton, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about November 2, 2007, defendant RALICK COLE possessed for distribution approximately 14 grams of crack cocaine in Easton.

2. On or about November 5, 2007, defendant KASEEM DOBSON possessed

for distribution approximately 7 grams of crack cocaine, in Phillipsburg, New Jersey.

3. On or about November 30 , 2007, defendant RALICK COLE possessed for distribution approximately 7 grams of crack cocaine in Easton.

4. On or about December 4, 2007, defendant RALICK COLE possessed for distribution approximately 7 grams of crack cocaine in Easton.

5. On or about December 6, 2007, defendants RALICK COLE and DORIAN RAWLINSON possessed for distribution approximately 7 grams of crack cocaine in Easton.

6. On or about December 7, 2007, defendant RALICK COLE possessed for distribution approximately 7 grams of crack cocaine in Easton.

7. On or about December 14, 2007, defendant RALICK COLE possessed for distribution approximately 3 grams of crack cocaine in Easton.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

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 THREE

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Two of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant COLE used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT FOUR

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**KASEEM DOBSON,
a/k/a "Strole,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Four of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DOBSON used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

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 SIX

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Six of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant COLE used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

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 EIGHT

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Eight of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant COLE used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot," and
DORIAN RAWLINSON,
a/k/a "Pee,"**

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), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot," and
DORIAN RAWLINSON,
a/k/a "Pee,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Ten of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant COLE used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers, at which meeting RAWLINSON arrived in a vehicle driven by COLE and RAWLINSON paid Rogers and received the crack cocaine from Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

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 CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**RALICK COLE,
a/k/a "Buck,"
a/k/a "Buckshot,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), described in Count Twelve of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant COLE used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**DORIAN RAWLINSON,
a/k/a "Pee,"**

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 FOURTEEN

THE GRAND JURY CHARGES THAT:

1. Paragraphs 2 and 3 of Count One of this superseding indictment are incorporated here.

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

**DORIAN RAWLINSON,
a/k/a "Pee,"**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the possession with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine") described in Count Fourteen of this superseding indictment, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant RAWLINSON used a telephone to discuss the purchase of crack cocaine and to arrange a meeting regarding the delivery of crack cocaine from Sean Rogers.

In violation of Title 21, United States Code, Section 843(b).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney