

**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
SHAMAR GRAY	:	VIOLATIONS:
NANCY SCHANENBERGER,	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a “Shorty”	:	50 grams or more of cocaine base
	:	(“crack”) - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 5 grams or more of
	:	cocaine base (“crack”) - 4 counts)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine base (“crack”)
	:	- 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

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

**SHAMAR GRAY and
NANCY SCHANENBERGER,
a/k/a “Shorty,”**

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 650 grams, 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 August 2007 to in or about January 2008.

2. On a weekly basis, defendants SHAMAR GRAY and NANCY SCHANENBERGER purchased at least one ounce of crack cocaine from Sean Rogers, charged elsewhere, in Easton, Pennsylvania.

3. Approximately four days of each week, defendants SHAMAR GRAY and NANCY SCHANENBERGER contacted Sean Rogers by telephone and placed orders for crack cocaine which was picked up and paid for by either defendants GRAY, SCHANENBERGER, or both defendants together. Defendants GRAY and SCHANENBERGER then re-sold the crack cocaine to customers in the Easton area.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, defendants SHAMAR GRAY and NANCY SCHANENBERGER committed the following overt acts, among others, in Easton, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about November 30, 2007:

(a) Defendant SHAMAR GRAY ordered approximately 7 grams of crack cocaine from Sean Rogers; and

(b) Defendant NANCY SCHANENBERGER met with Sean Rogers, who supplied her with approximately 7 grams of crack cocaine, for which SCHANENBERGER paid Rogers cash.

2. On or about December 1, 2007, at approximately 11:30 a.m., defendant SHAMAR GRAY possessed for distribution approximately 3 grams of crack cocaine.

3. On or about December 1, 2007, at approximately 1:40 p.m., defendants SHAMAR GRAY and NANCY SCHANENBERGER possessed for distribution approximately 7 grams of crack cocaine.

4. On or about December 1, 2007, at approximately 6:30 p.m., defendant NANCY SCHANENBERGER possessed for distribution approximately 10 grams of crack cocaine.

5. On or about December 3, 2007:

(a) Defendant SHAMAR GRAY ordered approximately 7 grams of crack cocaine from Sean Rogers; and

(b) Defendants GRAY and NANCY SCHANENBERGER together met with Sean Rogers, who supplied them with approximately 7 grams of crack cocaine, for which they paid Rogers cash.

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 30, 2007, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**SHAMAR GRAY and
NANCY SCHANENBERGER,
a/k/a “Shorty,”**

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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2007, at approximately 11:30 a.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

SHAMAR GRAY

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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2007, at approximately 1:40 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**SHAMAR GRAY and
NANCY SCHANENBERGER,
a/k/a “Shorty,”**

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 FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2007, at approximately 6:30 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

**NANCY SCHANENBERGER,
a/k/a “Shorty,”**

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

**SHAMAR GRAY and
NANCY SCHANENBERGER,
a/k/a “Shorty,”**

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.

A TRUE BILL:

FOREPERSON

**PATRICK L. MEEHAN
United States Attorney**