

**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
HOLLY VANDEVER KAWUAN RUDOLPH, a/k/a "GC"	:	VIOLATIONS:
	:	21 U.S.C. § 846 (conspiracy to distribute 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") - 15 counts)
	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine base ("crack") - 1 count)

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 June 2007, until in or about January, 2008, in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**HOLLY VANDEVER and
KAWUAN RUDOLPH,
a/k/a "GC,"**

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 7 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 and including the date of this indictment.

2. On a weekly basis, defendants HOLLY VANDEVER and KAWUAN RUDOLPH purchased at least two ounces (approximately 56 grams) of crack cocaine from Sean Rogers, charged elsewhere, in Easton, Pennsylvania.

3. Approximately six days of each week, defendants HOLLY VANDEVER and KAWUAN RUDOLPH contacted Sean Rogers by telephone and placed orders for crack cocaine, which was picked up and paid for by either VANDEVER, RUDOLPH, or both defendants together. Defendants VANDEVER and RUDOLPH 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 HOLLY VANDEVER and KAWUAN RUDOLPH committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 18, 2007, at approximately 2:00 p.m., defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

2. On or about October 18, 2007, at approximately 7:40 p.m., defendant HOLLY VANDEVER possessed for distribution approximately 7 grams of crack cocaine.

3. On or about October 19, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 17 grams of crack cocaine.

4. On or about October 22, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 21 grams of crack cocaine.

5. On or about October 24, 2007, at approximately 10:43 a.m., defendant HOLLY VANDEVER possessed for distribution approximately 10 grams of crack cocaine.

6. On or about October 24, 2007, at approximately 6:20 p.m., defendant HOLLY VANDEVER possessed for distribution approximately 10 grams of crack cocaine.

7. On or about October 26, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

8. On or about November 3, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

9. On or about December 3, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

10. On or about December 8, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

11. On or about December 11, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 10 grams of crack cocaine.

12. On or about December 14, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 14 grams of crack cocaine.

13. On or about December 14, 2007, defendant KAWUAN RUDOLPH possessed for distribution approximately 3 grams of crack cocaine.

14. On or about December 15, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 17 grams of crack cocaine.

15. On or about December 15, 2007, defendant KAWUAN RUDOLPH

possessed for distribution approximately 7 grams of crack cocaine.

16. On or about December 18, 2007, defendant HOLLY VANDEVER possessed for distribution approximately 28 grams of crack cocaine.

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 October 18, 2007, at approximately 2:00 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

HOLLY VANDEVER

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 FURTHER CHARGES THAT:

On or about October 18, 2007, at approximately 7:40 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

HOLLY VANDEVER

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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 17 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 FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2007, at approximately 10:43 a.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

HOLLY VANDEVER

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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2007, at approximately 6:20 p.m., in Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

HOLLY VANDEVER

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 EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 TEN

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

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 FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**KAWUAN RUDOLPH,
a/k/a "GC,"**

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

**KAWUAN RUDOLPH,
a/k/a "GC,"**

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 SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, approximately 17 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 SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

HOLLY VANDEVER

knowingly and intentionally possessed with intent to distribute 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).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney