

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KWAME FLUELLEN, a/k/a "King,"	:	VIOLATIONS:
CHE MOACIR FLUELLEN, a/k/a "Smoke,"	:	21 U.S.C. § 846 (conspiracy to distribute 500 grams or more of methamphetamine - 1 count)
MALIEK QUABENA FRAZIER, a/k/a "Tip,"	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute 500 grams or more of methamphetamine - 1 count)
ASAAD FRAZIER, a/k/a "J,"	:	
a/k/a "J-Star,"	:	
RASHAAD TOOMBS	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about October 2007, to in or about February 2009, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KWAME FLUELLEN,
a/k/a "King,"
CHE FLUELLEN,
a/k/a "Smoke,"
MALIEK FRAZIER,
a/k/a "Tip,"
ASAAD FRAZIER,
a/k/a "J,"
a/k/a "J-Star," and
RASHAAD TOOMBS**

conspired and agreed, together and with persons known and unknown to the grand jury, to knowingly and intentionally distribute, and to possess with intent to distribute, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants KWAME FLUELLEN and CHE FLUELLEN led, organized, and managed a faction of the Crips gang in the Lehigh Valley area, that is, Lehigh and Northampton Counties, in the Eastern District of Pennsylvania, for the purpose of obtaining and distributing controlled substances, including methamphetamine, for profit.

3. Defendants KWAME FLUELLEN and CHE FLUELLEN obtained bulk quantities of methamphetamine from Southern California for distribution in the Lehigh Valley area of the Eastern District of Pennsylvania, and elsewhere.

4. Defendants KWAME FLUELLEN and CHE FLUELLEN, distributed wholesale amounts of methamphetamine to their cousins, defendants MALIEK FRAZIER and ASAAD FRAZIER, for distribution to other drug trafficking groups and to customers.

5. Defendant KWAME FLUELLEN distributed methamphetamine to other drug trafficking groups, and to customers, using delivery “runners,” including defendants MALIEK FRAZIER, ASAAD FRAZIER, and RASHAAD TOOMBS.

6. Defendants KWAME FLUELLEN and CHE FLUELLEN controlled the street-level distribution of methamphetamine in Easton, Northampton County, while defendants MALIEK FRAZIER and ASAAD FRAZIER controlled the street-level distribution of methamphetamine in Allentown, Lehigh County.

7. Defendants KWAME FLUELLEN, CHE FLUELLEN, MALIEK FRAZIER, ASAAD FRAZIER, and RASHAAD TOOMBS used co-conspirators, including

family members and girlfriends, to store and distribute methamphetamine, and to launder the proceeds of their drug trafficking activities.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants KWAME FLUELLEN, CHE FLUELLEN, MALIEK FRAZIER, ASAAD FRAZIER, and RASHAAD TOOMBS, and other co-conspirators known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about November 15, 2007, defendant CHE FLUELLEN sold approximately 3.4 grams of methamphetamine to a person known to the grand jury as CS7 (CS7), in exchange for \$350.

2. On or about November 17, 2007, defendant CHE FLUELLEN sold approximately 13.5 grams of methamphetamine to CS7 in exchange for \$1,000.

3. On or about November 20, 2007, defendant CHE FLUELLEN sold approximately 23.7 grams of methamphetamine to CS7 in exchange for \$1,800.

4. On or about November 24, 2007, defendant CHE FLUELLEN sold approximately 15.6 grams of methamphetamine to CS7 in exchange for \$1,500.

5. On or about December 12, 2007, defendant CHE FLUELLEN sold approximately 13.9 grams of methamphetamine to CS7 in exchange for \$1,000.

6. On or about December 20, 2007, defendant CHE FLUELLEN told a person known to the grand jury as CS2 (CS2) that he had just distributed approximately one-half pound (approximately 227 grams) of methamphetamine, yielding \$11,000 in revenue, and that defendant KWAME FLUELLEN had in his possession a whole pound (approximately 454

grams) of methamphetamine.

7. On or about December 21, 2007, defendant CHE FLUELLEN discussed selling seven grams of methamphetamine to CS2, stating, "I got almost nine . . . I'll give you seven," and described the methamphetamine as "clear."

8. On or about January 9, 2008, defendant MALIEK FRAZIER discussed, with CS2 a future deal for methamphetamine, but stated that he had none at that time.

9. On or about January 9, 2008, defendant MALIEK FRAZIER discussed a future methamphetamine transaction of "two for 23" with CS2.

10. On or about January 12, 2008, defendants CHE FLUELLEN and ASAAD FRAZIER sold approximately 6.9 grams of methamphetamine to CS2 in exchange for \$500.

11. On or about January 15, 2008, defendant KWAME FLUELLEN instructed CS2 to send payments for drugs to him via wire, in Compton, California.

12. On or about January 15, 2008, defendant call MALIEK FRAZIER agreed to sell 14 grams of methamphetamine to CS2.

13. On or about January 15, 2008, defendant call MALIEK FRAZIER sold approximately 17.7 grams of sham methamphetamine to CS2.

14. On or about April 23, 2008, defendant CHE FLUELLEN sold approximately 12.1 grams of methamphetamine to CS7 in exchange for \$1,000.

15. On or about May 17, 2008, defendant CHE FLUELLEN sold approximately 7 grams of methamphetamine to CS7 in exchange for \$500.

16. On or about June 24, 2008, defendant CHE FLUELLEN sold approximately 7 grams of methamphetamine to CS7 in exchange for \$500.

17. On or about July 26, 2008, defendant CHE FLUELLEN sold approximately 13.4 grams of methamphetamine to CS7 in exchange for \$1,000.
18. On or about September 10, 2008, defendant CHE FLUELLEN sold approximately 6.4 grams of methamphetamine to CS7 in exchange for \$500.
19. On or about October 23, 2008, defendant CHE FLUELLEN sold approximately 7.6 grams of methamphetamine to CS7, in exchange for \$500.
20. On or about October 30, 2008, defendant MALIEK FRAZIER agreed to supply a person known to the grand jury as K.G. (K.G.) with two pounds of methamphetamine.
21. On or about October 30, 2008, defendants KWAME FLUELLEN, CHE FLUELLEN, and RASHAAD TOOMBS possessed with intent to distribute, and attempted to sell, approximately 2,146 grams (approximately five pounds) of methamphetamine to K.G.
22. On or about November 2, 2008, defendant KWAME FLUELLEN asked a co-conspirator known to the grand jury as A.L. on the telephone if she had spoken yet to a co-conspirator known to the grand jury as J.H., a/k/a "Crack Man," and spoke with a second co-conspirator who explained in coded language that a cache of drugs has been moved and is safe. J.H., a/k/a "Crack Man," then got on the phone and confirmed, "That shit is safe." FLUELLEN then promised to have his mother get his people some money.
23. On or about November 4, 2008, defendant KWAME FLUELLEN told a co-conspirator known to the grand jury as M.I. that a co-conspirator known to the grand jury as C.H. had information that could help KWAME FLUELLEN, as KWAME FLUELLEN was attempting to get lawyer for defendant RASHAAD TOOMBS.
24. On or about November 5, 2008, defendants KWAME FLUELLEN and MALIEK FRAZIER participated in a telephone call to a co-conspirator known to the grand jury

as J.B., in which KWAME FLUELLEN asked J.B. to get in touch with "Number One," to get confirmation that drugs (referred to as "luggage") had been given to someone. J.B. then repeated the directions, and asked if J.B. was supposed to then receive "the luggage," which KWAME FLUELLEN then confirmed. MALIEK FRAZIER then got back on the telephone and told J.B., "When you get the, um, the luggage and shit, just put it real, real, real, real, real, real safe."

25. On or about November 6, 2008, defendant MALIEK FRAZIER called a co-conspirator and asked her to confirm whether J.B. had obtained a parcel of drugs, to which MALIEK FRAZIER referred as "that luggage," further stating that he wanted to hear that she was getting it from that "dude." During the call, defendant KWAME FLUELLEN gave directions in the background, to have the co-conspirator call KWAME FLUELLEN's wife, to get in touch with "Smoke" (defendant CHE FLUELLEN), after which defendant MALIEK FRAZIER added that they were to "tell Dude to get that shit over."

26. On or about November 7, 2008, defendant MALIEK FRAZIER asked a co-conspirator to check on the status of "the luggage."

27. On or about November 9, 2008, defendants MALIEK FRAZIER and KWAME FLUELLEN called defendant ASAAD FRAZIER, whom he referred to as "J," who said he was "trying to keep shit going," and told MALIEK FRAZIER about an "incident" at the "big spot," referring to law enforcement actions taken at one of the organization's drug corners. KWAME FLUELLEN then told ASAAD FRAZIER that KWAME FLUELLEN was "laying low, making sure everything go according to plan," further declaring that "the plans ain't spoiled yet."

28. On or about November 11, 2008, defendants MALIEK FRAZIER and KWAME FLUELLEN called J.B., whom they specifically instructed to carry out a drug

transaction that would yield \$15,000 to \$16,000, further describing the packaged drugs as “five large ones and one small one.” KWAME FLUELLEN then told a male co-conspirator on the line that there should be six, but the male said that one got disposed. KWAME FLUELLEN stated, "I had five with my girl," to which the male co-conspirator said, "There was only one left on the table."

29. On or about November 11, 2008, defendant KWAME FLUELLEN called A.L. and J.H., a/k/a "Crack Man," with whom KWAME FLUELLEN discussed whether someone had obtained the "other five" packages of drugs discussed in the previous call. A.L. confirmed that she had gotten the "other one" out of there. A.L., then referring to the "other one" as "luggage," stated that she threw it up on the roof. KWAME FLUELLEN then instructed J.H., a/k/a "Crack Man" to help A.L. retrieve the "luggage" from the roof, and lamented that there "definitely was five of 'em. You're talking about a lot of shit."

30. On or about November 13, 2008, defendant KWAME FLUELLEN called a co-conspirator. KWAME FLUELLEN, referring to ASAAD FRAZIER, said, "He runnin' around with my shit in his pocket." The co-conspirator asked, "How much?" to which KWAME FLUELLEN replied, "I gave him a whole one. Just think about it. Sixteen, seventeen."

31. On or about December 11, 2008, co-conspirator C.H. agreed to sell a quantity of methamphetamine to CS7, in exchange for \$500.

32. On or about December 11, 2008, co-conspirators C.H. and J.W. sold approximately 5.2 grams of methamphetamine to CS7 in exchange for \$500.

33. On or about December 23, 2008, co-conspirator C.H. agreed to sell a quantity of methamphetamine to CS7 in exchange for \$500.

34. On or about December 23, 2008, co-conspirators C.H. and J.W. sold approximately 5.1 grams of methamphetamine to CS7 in exchange for \$500.

35. On or about January 18, 2009, defendant CHE FLUELLEN called C.H. and had her put him through to defendant ASAAD FRAZIER. CHE FLUELLEN and ASAAD FRAZIER discussed a deal for "four," which they later clarified as \$400. ASAAD FRAZIER explained, "He said he gave the shit to your people, they ran off."

36. On or about January 27, 2009, defendant ASAAD FRAZIER agreed to meet with CS7 to conduct a methamphetamine transaction.

37. On or about January 28, 2009, defendant ASAAD FRAZIER sold approximately 7 grams of methamphetamine to CS7 in exchange for \$500.

38. On or about January 29, 2009, co-conspirator C.H. gave permission to CS7 to directly call defendant ASAAD FRAZIER for orders of methamphetamine.

39. On or about February 4, 2009, defendant ASAAD FRAZIER and co-conspirator J.F. sold approximately 7 grams of methamphetamine to CS7 in exchange for \$500.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 30, 2008, in Northampton County, in the Eastern District of Pennsylvania, defendants

**KWAME FLUELLEN,
a/k/a “King,”
CHE FLUELLEN,
a/k/a “Smoke,” and
RASHAAD TOOMBS**

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

A TRUE BILL:

FOREPERSON

MICHAEL L. LEVY
United States Attorney