

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

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
OMINI ONEN WILLIAMS, a/k/a "William Omini," a/k/a "Williams Omini Onen," KINGSLEY IBEH	:	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute 100 grams or more of heroin - 1 count) 21 U.S.C. § 841(a)(1), (b)(1)(B) (possession with intent to distribute 100 grams or more of heroin - 1 count) 18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about May 25, 2009, through on or about May 31, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OMINI ONEN WILLIAMS,
a/k/a "William Omini,"
a/k/a "Williams Omini Onen," and
KINGSLEY IBEH**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally distribute 100 grams or more, that is, approximately 590.7 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants OMINI ONEN WILLIAMS and KINGSLEY IBEH agreed to distribute heroin in Philadelphia, Pennsylvania, for profit.
3. Defendant OMINI ONEN WILLIAMS obtained a buyer for the drugs, and defendant KINGSLEY IBEH supplied heroin for the sale.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants OMINI ONEN WILLIAMS and KINGSLEY IBEH committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about May 25, 2009, defendants OMINI ONEN WILLIAMS and KINGSLEY IBEH met with a cooperating witness ("CW") in Philadelphia to discuss the sale of a quantity of heroin to the CW, and, during the meeting, defendant WILLIAMS provided the CW with a sample of the heroin that he intended to supply the CW.
2. On or about May 26, 2009, during a telephone call, defendant OMINI ONEN WILLIAMS told the CW that he and defendant KINGSLEY IBEH would sell the CW 200 grams of heroin for \$80 per gram.
3. On or about May 29, 2009, during a telephone call, defendant OMINI ONEN WILLIAMS told the CW that KINGSLEY IBEH was going to return to Philadelphia on a bus from Indianapolis, Indiana, with 600 grams of heroin.
4. On or about May 30, 2009:
 - a. Defendant KINGSLEY IBEH transported heroin on a bus from

Indianapolis, Indiana, to Philadelphia, Pennsylvania.

b. During a telephone call, defendant OMINI ONEN WILLIAMS and the CW agreed that defendants WILLIAMS and KINGSLEY IBEH would sell 600 grams of heroin to the CW on May 31, 2009.

5. On or about May 31, 2009, defendants OMINI ONEN WILLIAMS and KINGSLEY IBEH drove together, with a quantity of approximately 590.7 grams of heroin in defendant WILLIAMS' grey Chevrolet pickup truck, to a parking lot near 2106 S. Columbus Boulevard in Philadelphia, where defendant WILLIAMS met with the CW to discuss the sale of the heroin, while defendant IBEH held at least some of the heroin in a green, plastic bag.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 31, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**OMINI ONEN WILLIAMS,
a/k/a “William Omini,”
a/k/a “Williams Omini Onen,” and
KINGSLEY IBEH**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 100 grams or more, that is, approximately 590.7 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I 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:

GRAND JURY FOREPERSON

**MICHAEL L. LEVY
United States Attorney**