

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants WAYNE JOHNAKIN and OTIS LEE REESE agreed to distribute cocaine, which had been sent from a location in California to Philadelphia, Pennsylvania.

3. Defendant WAYNE JOHNAKIN provided cocaine to defendant OTIS LEE REESE on consignment. After defendant REESE sold the cocaine, he paid defendant JOHNAKIN a large portion of the sales proceeds the next time they met.

4. At the direction of defendant WAYNE JOHNAKIN, defendant OTIS LEE REESE often traveled from Virginia to Philadelphia, Pennsylvania to obtain cocaine from defendant JOHNAKIN before transporting the cocaine back to Virginia for sale.

5. Defendants WAYNE JOHNAKIN and OTIS LEE REESE communicated with each other, and with others known and unknown to the grand jury, using cellular telephones to discuss the retrieval and sale of cocaine.

6. Defendant WAYNE JOHNAKIN used rental cars to transport and sell cocaine.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WAYNE JOHNAKIN,
a/k/a "Wiz,"**

knowingly and intentionally distributed 500 grams or more, that is, approximately 509 grams, of a mixture and substance containing a detectable amount of cocaine, 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 December 8, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

OTIS LEE REESE

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 509 grams, of a mixture and substance containing a detectable amount of cocaine, 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 December 13, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WAYNE JOHNAKIN,
a/k/a "Wiz,"**

knowingly and intentionally distributed 500 grams or more, that is, approximately 1.19 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841 and 846, set forth in this indictment, defendants

**WAYNE JOHNAKIN,
a/k/a “Wiz,”
and
OTIS LEE REESE,**

shall forfeit to the United States:

- (a) any and all real or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations; and
- (b) any and all real or personal property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney