

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. :** \_\_\_\_\_

**v.**

**DATE FILED:** \_\_\_\_\_

**JUNELL OSBORNE** : **VIOLATIONS:**  
**21 U.S.C. § 846 (conspiracy to distribute heroin - 1 count)**  
**21 U.S.C. § 841(a)(1), (b)(1)(C) (possession with intent to distribute heroin - 1 count)**  
**21 U.S.C. § 841(a)(1), (b)(1)(C) (distribution of cocaine base (“crack”) - 1 count)**  
**21 U.S.C. § 841(a)(1), (b)(1)(D) (possession with intent to distribute marijuana - 2 counts)**  
**18 U.S.C. § 924(c)(1) (possession of firearm in furtherance of drug trafficking crime - 1 count)**  
**18 U.S.C. § § 922(g)(1) (possession of firearm by convicted felon - 2 counts)**  
**18 U.S.C. § 2 (aiding and abetting)**  
**Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about a date unknown to the grand jury but some time in 2010, through on or about January 26, 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**JUNELL OSBORNE**

conspired and agreed with others known and unknown to the grand jury, including B. G., a person known to the grand jury and charged elsewhere, to knowingly and intentionally distribute and possess with intent to distribute 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)(C).

**MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendant JUNELL OSBORNE stored and possessed heroin inside his residence, located at 9400 Lansford Street, Philadelphia, and inside B.G.'s residence, located at 9404 Lansford Street, Philadelphia, and intended to deliver and sell the heroin to others in the Philadelphia area.

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in Philadelphia, in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 26, 2011, defendant JUNELL OSBORNE and coconspirator B.G. possessed for distribution approximately 12.303 grams of heroin at 9400 Lansford Street.

2. On or about January 26, 2011, defendant JUNELL OSBORNE possessed for distribution approximately 0.664 grams of heroin at 9404 Lansford Street.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 3, 2010, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE**

knowingly and intentionally possessed with intent to distribute approximately 133.91 grams of a  
mixture and substance containing a detectable amount of marijuana, a Schedule I controlled  
substance.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 26, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JUNELL OSBORNE**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 12.967 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)(C), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2011, in Bensalem, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE**

knowingly and intentionally distributed approximately 2.62 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)(C).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2011, in Bensalem, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE**

knowingly and intentionally possessed with intent to distribute approximately 99.69 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2011, in Bensalem, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE**

knowingly possessed a firearm, that is, a Smith & Wesson Model 6906 .9 millimeter semi-automatic handgun, serial number TVB5140, loaded with eight live rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution and possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts Four and Five of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 3, 2010, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus PT 100 AFS .40 caliber semi-automatic handgun, serial number STA70334, loaded with eight live rounds of ammunition; and 36 loose rounds of .40 caliber ammunition, 42 rounds of .9 millimeter ammunition, and 544 rounds of .22 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2011, in Bensalem, in the Eastern District of Pennsylvania,  
defendant

**JUNELL OSBORNE,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Smith & Wesson Model 6906 .9 millimeter semi-automatic handgun, serial number TVB5140, loaded with eight live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1) set forth in this indictment, the defendant

**JUNELL OSBORNE**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and ammunition involved in the commission of such offenses including, but not limited to:

- (a) One Taurus PT 100 AFS .40 caliber semi-automatic handgun, serial number STA70334 , loaded with eight live rounds of ammunition;
- (b) One Smith & Wesson Model 6906 .9 millimeter semi-automatic handgun, serial number TVB5140, loaded with eight live rounds of ammunition;
- (c) 36 loose rounds of .40 caliber ammunition;
- (d) 42 rounds of .9 millimeter ammunition; and
- (e) 544 rounds of .22 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

2. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in this indictment, defendant

**JUNELL OSBORNE**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

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

(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 with out 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 defendant up to the value of property subject to forfeiture.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER**  
**United States Attorney**