

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 11-
v. : DATE FILED: _____
MAYOSHI SANDERS, (1) : 21 U.S.C. § 846 (conspiracy to
a/k/a “O,” : distribute 280 grams or more of cocaine
a/k/a “Mayo,” : base (“crack”), 500 grams or more of
a/k/a “Salim,” : cocaine, heroin, marijuana, oxycodone,
ALFRED JENKINS, (2) : alprozalam – 1 count)
a/k/a “Zeez,” : 21 U.S.C. § 841(a)(1) (distribution of
TIYEAK COOK, (3) : cocaine base (“crack”) – 11 counts)
a/k/a “Eak,” : 21 U.S.C. § 846 (distribution of
JAMAL STEWART, (4) : cocaine – 7 counts)
a/k/a “Mali,” : 21 U.S.C. § 841(a)(1) (distribution of
a/k/a “Mal,” : cocaine base (“crack”) and heroin – 2
WILLIAM FRISBY, (5) : counts)
a/k/a “Gate,” : 21 U.S.C. § 841(a)(1) (possession with
a/k/a “Bill,” : intent to distribute cocaine base (“crack”)
ELIZABETH CADOGAN, (6) : – 5 counts)
a/k/a “Precious,” : 21 U.S.C. § 841(a)(1) (possession with
PHILIS MCALLISTER, (7) : intent to distribute cocaine – 7 counts)
BETTY ANN MCKINNEY, (8) : 21 U.S.C. § 841(a)(1) (possession with
a/k/a “New York,” : intent to distribute 28 grams or more of
a/k/a “Beverly Bachniche,” : cocaine base (“crack”) and cocaine – 1
a/k/a “Rebecca Gay,” : count)
a/k/a “Rebecca McKinney : 21 U.S.C. § 841(a)(1) (possession with
HAROLD JACKSON, (9) : intent to distribute cocaine and heroin – 1
KWANE GLOVER, (10) : count)
THOMAS BOWIE, (11) : 21 U.S.C. § 841(a)(1) (possession with
a/k/a “Tommy,” : intent to distribute heroin and marijuana
TERRANCE WADE, (12) : - 1 count)
a.k.a “Turk,” : 21 U.S.C. § 841(a)(1) (possession with
MALANI SANDERS, (13) : intent to distribute cocaine base (“crack”)
a/k/a “Dog,” : and marijuana – 1 count)
DAVON STOKES, (14) : 21 U.S.C. § 841(a)(1) (possession with
FRANK WADE, (15) : intent to distribute oxycodone – 1 count)
a/k/a “Robert Wade” : 21 U.S.C. § 841(a)(1) (possession with
: intent to distribute alprozalam – 1 count)
: 21 U.S.C. § 843(b) (unlawful use of a
: communication facility in furtherance of
: a drug crime – 12 counts)

- : 21 U.S.C. § 856 (maintaining a drug house – 4 counts)
- : 21 U.S.C. § 841(a)(1) (distribution of 28 grams or more of cocaine base (“crack”)
- : – 1 count)
- : 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking crime – 2 counts)
- : 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition – 2 counts)
- : Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about March 2009, to on or about August 30, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”
ALFRED JENKINS,
a/k/a “Zeez,”
TIYEAK COOK,
a/k/a “Eak,”
JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”
WILLIAM FRISBY,
a/k/a “Gate,”
a/k/a “Bill,”
ELIZABETH CADOGAN,
a/k/a “Precious,”
PHILIS MCALLISTER,
BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”**

**a/k/a “Rebecca McKinney,”
HAROLD JACKSON,
KWANE GLOVER,
THOMAS BOWIE,
a/k/a “Tommy,”
TERRANCE WADE,
a/k/a “Turk,”
MALANI SANDERS,
a/k/a “Dog,”
DAVON STOKES, and
FRANK WADE,
a/k/a “Robert Wade,”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute controlled substances, that is, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”) and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, each a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and (b)(1)(B); a mixture and substance containing a detectable amount of heroin and a mixture and substance containing a detectable amount of marijuana, each a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and (b)(1)(D); a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C); and a mixture and substance containing a detectable amount of alprozalam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(2).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant MAYOSHI SANDERS was the leader and organizer of a drug distribution organization operating within the Courtyard Apartments, a federally subsidized

housing development, in the Queens Village section of the city of Philadelphia, Pennsylvania. From in or about March 2009, to on or about August 30, 2011, The Sanders Drug Trafficking Organization (DTO) distributed in excess of 280 grams of crack cocaine and 500 grams of cocaine.

3. Defendants MAYOSHI SANDERS, TIYEAK COOK, and JAMAL STEWART, and others known and unknown to the grand jury, obtained quantities of cocaine from suppliers, including defendant ALFRED JENKINS, within the Eastern District of Pennsylvania.

4. Defendant MAYOSHI SANDERS sold cocaine supplied by defendant ALFRED JENKINS and supplied cocaine to other members of The Sanders DTO, including defendants TIYEAK COOK, JAMAL STEWART, WILLIAM FRISBY, ELIZABETH CADOGAN, PHILIS MCALLISTER, BETTY ANN MCKINNEY, HAROLD JACKSON, KWANE GLOVER, THOMAS BOWIE, TERRANCE WADE, MALANI SANDERS, DAVON STOKES, and FRANK WADE; Karim Carter, deceased; T.H. and K.R., each a juvenile; and others known and unknown to the grand jury, for resale.

5. Defendants MAYOSHI SANDERS, TIYEAK COOK, and JAMAL STEWART also converted or “cooked” cocaine into crack cocaine, and had others do so for them, and then sold the crack cocaine themselves and supplied the crack cocaine to other members of The Sanders DTO, including defendants WILLIAM FRISBY, ELIZABETH CADOGAN, PHILIS MCALLISTER, BETTY ANN MCKINNEY, HAROLD JACKSON, KWANE GLOVER, THOMAS BOWIE, TERRANCE WADE, MALANI SANDERS, DAVON STOKES, and FRANK WADE; Karim Carter; T.H. and K.R.; and others known and unknown to

the grand jury, for resale.

6. Members of The Sanders DTO, including defendants MAYOSHI SANDERS, TIYEAK COOK, JAMAL STEWART, WILLIAM FRISBY, ELIZABETH CADOGAN, PHILIS MCALLISTER, BETTY ANN MCKINNEY, HAROLD JACKSON, KWANE GLOVER, THOMAS BOWIE, TERRANCE WADE, MALANI SANDERS, DAVON STOKES, and FRANK WADE; Karim Carter; and T.H. and K.R.; and others known and unknown to the grand jury, distributed cocaine, crack cocaine, and, on some occasions, heroin, marijuana, oxycodone, and alprozalam, to customers of The Sanders DTO both inside and outside of the real property comprising the public housing known as The Courtyard Apartments, located at the 500 block of Christian Street in Philadelphia.

9. Members of The Sanders DTO used various residences as “stash houses” in The Courtyard Apartments, to store and package cocaine, crack cocaine, and other controlled substances for distribution, including but not limited to:

- a. 432 Christian Street,
- b. 466 Christian Street,
- c. 931 S. 5th Street, and
- d. 519 Christian Street.

10. To further their objectives of protecting their narcotics trafficking activities, members of The Sanders DTO routinely carried firearms and had firearms available in hidden locations.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the defendants and others known and unknown to the grand jury committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about September 30, 2010, in the area of 17th Street & Snyder Avenue, defendant MAYOSHI SANDERS, sold 7 grams of cocaine for \$325 to a confidential source (referred to as "CS #1") acting at the direction of federal agents.
2. On or about October 8, 2010, in the area of 1600 block of Columbus Boulevard, defendant MAYOSHI SANDERS, sold 9.4 grams of crack cocaine for \$650 to "CS#1."
3. On or about October 21, 2010, in the area of the 1600 block of Columbus Boulevard, defendant MAYOSHI SANDERS, sold 33.06 grams of crack cocaine for \$1,625 to "CS#1."
4. On or about November 17, 2010, in the area of the 700 block of Christian Street, defendant JAMAL STEWART sold 1.5 grams of crack cocaine for \$200 to a confidential source (referred to as "CS #2") acting at the direction of federal agents.
5. On or about November 24, 2010, in the area of the 700 block of Christian Street, defendant JAMAL STEWART sold 0.70 grams of crack cocaine for \$100 to "CS #2."
6. On or about February 4, 2011, in the area of Columbus Boulevard, defendant MAYOSHI SANDERS sold 6.5 grams of crack cocaine and 0.92 grams of heroin for \$550 to "CS #1."

7. On or about February 27, 2011, in the area of the 500 block of Christian Street, defendant FRANK WADE possessed with the intent to distribute 3.5 grams of crack cocaine.

8. On or about March 23, 2011, in the area of the 16th Street & Lehigh Avenue, defendant ALFRED JENKINS distributed approximately 126 grams of cocaine to defendant MAYOSHI SANDERS.

9. On or about March 23, 2011, in the area of the 600 block of Christian Street, defendant JAMAL STEWART sold 2.57 grams of crack cocaine and 0.42 grams of heroin for \$400 to "CS #2."

10. On or about March 24, 2011, defendant BETTY ANN MCKINNEY used a telephone to order drugs from defendant MAYOSHI SANDERS.

11. On or about March 25, 2011, defendant MAYOSHI SANDERS used a telephone to discuss aspects of his narcotics trafficking operation.

12. On or about March 25, 2011, defendant HAROLD JACKSON used a telephone to order drugs from defendant MAYOSHI SANDERS.

13. On or about March 26, 2011, defendant MALANI SANDERS used a telephone to order drugs from defendant MAYOSHI SANDERS.

14. On or about March 27, 2011, in the area of the 17th Street & Lehigh Avenue, defendant ALFRED JENKINS distributed approximately 126 grams of cocaine to defendant MAYOSHI SANDERS.

15. On or about March 27, 2011, defendant MAYOSHI SANDERS distributed approximately 28 grams of cocaine to defendant JAMAL STEWART.

16. On or about March 31, 2011, defendant ELIZABETH CADOGAN used a telephone to order drugs from defendant MAYOSHI SANDERS.

17. On or about March 31, 2011, in the area of the 19th Street & Susquehanna Avenue, defendant ALFRED JENKINS distributed approximately 63 grams of cocaine to defendant MAYOSHI SANDERS.

18. On or about April 1, 2011, in the area of the 500 block of Christian Street, defendant FRANK WADE sold 2.9 grams of crack cocaine for \$300 to “CS #2.”

19. On or about April 1, 2011, defendant WILLIAM FRISBY used a telephone to order drugs from defendant MAYOSHI SANDERS.

20. On or about April 6, 2011, in the area of the 500 block of Christian Street, defendant FRANK WADE sold 2.3 grams of crack cocaine for \$300 to “CS #2.”

21. On or about April 6, 2011, defendant DAVON STOKES used a telephone to order drugs from defendant MAYOSHI SANDERS.

22. On or about April 9, 2011, defendant MAYOSHI SANDERS distributed approximately 3.5 grams of crack cocaine to defendant KWANE GLOVER.

23. On or about April 12, 2011, defendant PHILIS MCALLISTER used a telephone to order drugs from defendant MAYOSHI SANDERS.

24. On or about April 14, 2011, in the area of the 500 block of Christian Street, defendant BETTY ANN MCKINNEY sold 0.36 grams of crack cocaine for \$100 to a Philadelphia Police Officer acting in an undercover capacity.

25. On or about April 15, 2011, in the area of the 500 block of Christian Street, defendant FRANK WADE sold 3.5 grams of crack cocaine for \$300 to “CS #2.”

26. On or about April 15, 2011, defendant TERRANCE WADE used a telephone to order drugs from defendant MAYOSHI SANDERS.

27. On or about April 16, 2011, in the area of the 19th Street & Susquehanna Avenue, defendant ALFRED JENKINS distributed approximately 70 grams of cocaine to defendant MAYOSHI SANDERS.
28. On or about April 16, 2011, defendant PHILIS MCALLISTER used a telephone to order drugs from defendant MAYOSHI SANDERS.
29. On or about April 17, 2011, defendant MAYOSHI SANDERS distributed approximately 3.5 grams of crack cocaine to defendant KWANE GLOVER.
30. On or about April 17, 2011, defendant THOMAS BOWIE used a telephone to order drugs from defendant MAYOSHI SANDERS.
31. On or about April 19, 2011, defendant MAYOSHI SANDERS distributed approximately 14 grams of crack cocaine to defendant JAMAL STEWART.
32. On or about April 19, 2011, defendant HAROLD JACKSON possessed with the intent to distribute oxycodone.
33. On April 21, 2011, in the area of the 700 block of South 4th Street, Karim Carter sold 3.17 grams of crack cocaine for \$300 to “CS #2.”
34. On April 28, 2011, in the area of the 700 block of South 4th Street, Karim Carter sold 5.4 grams of crack cocaine for \$300 to “CS #2.”
35. On or about May 2, 2011, in the area of the 19th Street & Susquehanna Avenue, defendant ALFRED JENKINS distributed approximately 126 grams of cocaine to defendant MAYOSHI SANDERS.
36. On or about May 2, 2011, defendant TIYEAK COOK used a telephone to discuss converting cocaine into cocaine base “crack.”
37. On or about May 2, 2011, defendant MAYOSHI SANDERS possessed with intent to distribute 95 grams of crack cocaine and 7.35 grams of cocaine.

38. On or about May 3, 2011, in the area of the 500 block of Christian Street, defendant BETTY ANN MCKINNEY sold 0.59 grams of crack cocaine to an Philadelphia Police Officer acting in an undercover capacity for \$100.00.

39. On or about May 5, 2011, in the area of the 500 block of Christian Street, defendant WILLIAM FRISBY possessed with intent to distribute 0.61 grams of marijuana, 4 grams of heroin, and 0.89 grams of crack cocaine.

40. On or about May 6, 2011, in the area of the 500 block of Christian Street, defendant MAYOSHI SANDERS possessed with intent to distribute 6.68 grams of crack cocaine and 2.4 grams of marijuana.

41. On or about May 25, 2011, inside of 6124 Germantown Avenue, defendant MAYOSHI SANDERS possessed with intent to distribute 1.6 grams of crack cocaine, drug paraphernalia, and two firearms.

42. On or about May 25, 2011, inside of 5619 Pemberton Street, defendant ALFRED JENKINS possessed with intent to distribute 25.23 grams of cocaine and drug paraphernalia.

43. On or about May 25, 2011, inside of 1414 S. 31st Street, defendant TIYEAK COOK possessed with intent to distribute approximately 28.76 grams of cocaine, approximately 3 grams of heroin, drug paraphernalia, and three loaded firearms.

44. On or about August 12, 2011, defendant MAYOSHI SANDERS possessed with intent to distribute 69 alprozalam pills.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally distributed approximately 7 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)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally distributed approximately 9.4 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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 33.06 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 November 17, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”**

knowingly and intentionally distributed approximately 1.5 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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”**

knowingly and intentionally distributed approximately 0.70 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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 4, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally distributed approximately 6.5 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance; and approximately 0.92 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).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FRANK WADE,
a/k/a “Robert Wade,”**

knowingly and intentionally possessed with intent to distribute approximately 3.5 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 NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFRED JENKINS

knowingly and intentionally distributed approximately 126 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)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 126 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)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”**

knowingly and intentionally distributed approximately 2.57 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance; and approximately 0.42 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).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about March, 2009, to on or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”
a/k/a “Rebecca McKinney,”**

managed and controlled the residence located at 519 Christian Street in Philadelphia, and knowingly and intentionally made available for use this residence, for the purpose of unlawfully storing, manufacturing, distributing, and using controlled substances, including cocaine and cocaine base (“crack”), each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”
a/k/a “Rebecca McKinney,”**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant MCKINNEY used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant SANDERS used a telephone to discuss the details surrounding the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD JACKSON

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant JACKSON used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**MALANI SANDERS,
a/k/a “Dog,”**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant SANDERS used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFRED JENKINS

knowingly and intentionally distributed approximately 126 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)(C).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 126 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)(C).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally distributed approximately 28 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)(C).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”**

knowingly and intentionally possessed with intent to distribute approximately 28 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)(C).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about March, 2009, to on or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ELIZABETH CADOGAN,
a/k/a “Precious,”**

managed and controlled the residence located at 466 Christian Street in Philadelphia, and knowingly and intentionally made available for use the residence, for the purpose of unlawfully storing, manufacturing, distributing, and, using controlled substances, including cocaine and cocaine base (“crack”), each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ELIZABETH CADOGAN,
a/k/a “Precious,”**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant CADOGAN used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFRED JENKINS

knowingly and intentionally distributed approximately 63 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)(C).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 63 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)(C).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FRANK WADE,
a/k/a “Robert Wade,”**

knowingly and intentionally distributed approximately 2.9 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 TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WILLIAM FRISBY,
a/k/a "Gate,"
a/k/a "Bill,"**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant FRISBY used a telephone to arrange for the purchase of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FRANK WADE,
a/k/a “Robert Wade,”**

knowingly and intentionally distributed approximately 2.3 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 TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DAVON STOKES

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant STOKES used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly and intentionally distributed approximately 3.5 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 THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KWANE GLOVER

knowingly and intentionally possessed with intent to distribute approximately 3.5 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 THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about March, 2009, to on or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PHILIS MCALLISTER

managed and controlled the residence located at 931 S. 5th Street in Philadelphia, and knowingly and intentionally made available for use the residence, for the purpose of unlawfully storing, manufacturing, distributing, and using controlled substances, including cocaine and cocaine base (“crack”), each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 12, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PHILIS MCALLISTER

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant MCALLISTER used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 14, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”
a/k/a “Rebecca McKinney,”**

knowingly and intentionally distributed approximately 0.36 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 THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FRANK WADE,
a/k/a “Robert Wade,”**

knowingly and intentionally distributed approximately 3.5 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 THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TERRANCE WADE,
a/k/a "Turk,"**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant WADE used a telephone to arrange for the purchase of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFRED JENKINS

knowingly and intentionally distributed approximately 70 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)(C).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 70 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)(C).

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PHILIS MCALLISTER

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant MCALLISTER used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally distributed approximately 3.5 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 FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KWANE GLOVER

knowingly and intentionally possessed with intent to distribute approximately 3.5 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 FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**THOMAS BOWIE,
a/k/a “Tommy,”**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant BOWIE used a telephone to arrange for the purchase of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly and intentionally distributed 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)(C).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”**

knowingly and intentionally possessed with intent to distribute 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)(C).

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD JACKSON

knowingly and intentionally possessed with intent to distribute 35 OxyContin 30mg tablets, each of which is a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

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

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ALFRED JENKINS

knowingly and intentionally distributed approximately 63 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)(C).

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 63 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)(C).

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about March, 2009, to on or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TIYEAK COOK,
a/k/a/ "Eak,"**

managed and controlled the residence located at 1414 S. 31st Street in Philadelphia, and knowingly and intentionally made available for use the residence, for the purpose of unlawfully storing, manufacturing, distributing, and using controlled substances, including cocaine and cocaine base ("crack"), each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**TIYEAK COOK,
a/k/a/ "Eak,"**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate a drug felony, in that defendant COOK used a telephone to arrange to cook cocaine into cocaine base ("crack"), each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute 28 grams or more, that is, approximately 95 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), and approximately 7.35 grams of a mixture and substance containing a detectable amount of cocaine, each a Schedule II controlled substance.

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

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 3, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”
a/k/a “Rebecca McKinney,”**

knowingly and intentionally distributed approximately 0.59 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 FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**WILLIAM FRISBY,
a/k/a “Gate,”
a/k/a “Bill,”**

knowingly and intentionally possessed with intent to distribute approximately 4 grams of a mixture and substance containing a detectable amount of heroin, and approximately 0.61 grams of a mixture and substance containing a detectable amount of marijuana, each a Schedule I controlled substance; and 0.89 grams 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 FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 6, 2011, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute approximately 6.68 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance; and approximately 2.4 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)(C) and (b)(1)(D).

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly and intentionally possessed with intent to distribute approximately 1.6 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 FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”**

knowingly possessed a firearm, that is:

- (1) a Beretta, Model 92FS, 9mm semi-automatic pistol, serial #D23829Z, and
- (2) a Ruger, Model P94, .40 caliber semi-automatic, serial #340-98526, loaded with nine 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, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute cocaine base (“crack”) and marijuana, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

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:

- (1) a Beretta, Model 92FS, 9mm semi-automatic pistol, serial #D23829Z, and
- (2) a Ruger, Model P94, .40 caliber semi-automatic, serial #340-98526, loaded with nine live rounds of ammunition.

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

COUNT FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFRED JENKINS

knowingly and intentionally possessed with intent to distribute approximately 25.23 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)(C).

COUNT FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TIYEAK COOK,
a/k/a "Eak,"**

knowingly and intentionally possessed with intent to distribute approximately 28.76 grams of cocaine, a Schedule II controlled substance; and approximately 3 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).

COUNT FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TIYEAK COOK,
a/k/a “Eak”**

knowingly possessed a firearm, that is:

- (1) a Taurus, Model PT 111, 9mm semi-automatic pistol, serial #TZG53869, loaded with twelve live rounds of ammunition,
- (2) a Beretta, Model P92FS, 9mm semi-automatic pistol, serial #BER304918Z, loaded with sixteen live rounds of ammunition, and
- (3) an Harrington & Richardson, Model 900, .22 caliber revolver, serial #AA8264, loaded with an extended clip containing twenty 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, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute cocaine and heroin, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TIYEAK COOK,
a/k/a “Eak,”**

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:

- (1) a Taurus, Model PT 111, 9mm semi-automatic pistol, serial #TZG53869, loaded with twelve live rounds of ammunition,
- (2) a Beretta, Model P92FS, 9mm semi-automatic pistol, serial #BER304918Z, loaded with sixteen live rounds of ammunition, and
- (3) an Harrington & Richardson, Model 900, .22 caliber revolver, serial #AA8264, loaded with an extended clip containing twenty live rounds of ammunition.

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

COUNT SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAYOSHI SANDERS,
a/k/a "O,"
a/k/a "Mayo,"
a/k/a "Salim,"**

knowingly and intentionally possessed with intent to distribute 69 Alprozalam 1mg tablets, each of which is a mixture and substance containing a detectable amount of alprozalam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,”
ALFRED JENKINS,
a/k/a “Zeez,”
TIYEAK COOK,
a/k/a “Eak,”
JAMAL STEWART,
a/k/a “Mali,”
a/k/a “Mal,”
WILLIAM FRISBY,
a/k/a “Gate,”
a/k/a “Bill,”
ELIZABETH CADOGAN,
a/k/a “Precious,”
PHILIS MCALLISTER,
BETTY ANN MCKINNEY,
a/k/a “New York,”
a/k/a “Beverly Bachniche,”
a/k/a “Rebecca Gay,”
a/k/a “Rebecca McKinney,”
HAROLD JACKSON,
KWANE GLOVER,
THOMAS BOWIE,
a/k/a “Tommy,”
TERRANCE WADE,
a/k/a “Turk,”
MALANI SANDERS,
a/k/a “Dog,”
DAVON STOKES, and
FRANK WADE,
a/k/a “Robert Wade,”**

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 offense, including the following:

- (1) a Beretta, Model 92FS, 9mm semi-automatic pistol, serial #D23829Z,
- (2) a Ruger, Model P94, .40 caliber semi-automatic, serial #340-98526, loaded with nine live rounds of ammunition,
- (3) a Taurus, Model PT 111, 9mm semi-automatic pistol, serial #TZG53869, loaded with twelve live rounds of ammunition,
- (4) a Beretta, Model P92FS, 9mm semi-automatic pistol, serial #BER304918Z, loaded with sixteen live rounds of ammunition, and
- (5) an Harrington & Richardson, Model 900, .22 caliber revolver, serial #AA8264, loaded with an extended clip containing twenty live rounds of ammunition.

b. Any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including the following:

- (1) \$500,000 U.S. currency.

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.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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, defendants

**MAYOSHI SANDERS,
a/k/a “O,”
a/k/a “Mayo,”
a/k/a “Salim,” and
TIYEAK COOK,
a/k/a “Eak,”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offenses, including, but not limited to:

1. a Beretta, Model 92FS, 9mm semi-automatic pistol,
serial #D23829Z,
2. a Ruger, Model P94, .40 caliber semiautomatic, serial #340-98526, loaded with nine live rounds of ammunition,
3. a Taurus, Model PT 111, 9mm semi-automatic pistol,
serial #TZG53869, loaded with twelve live rounds of ammunition,
4. a Beretta, Model P92FS, 9mm semi-automatic pistol,
serial#BER304918Z, loaded with sixteen live rounds of ammunition, and
5. an Harrington & Richardson, Model 900, .22 caliber revolver,
serial #AA8264, loaded with an extended clip containing twenty live rounds of ammunition.

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

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE D. MEMEMGER
UNITED STATES ATTORNEY**