

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

Filed Under Seal

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
LAQUAN ALLEN, : VIOLATIONS:
a/k/a "Khabir" : 21 U.S.C. § 841(a)(1) (possession with the
: intent to distribute heroin - 1 count)
: Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 13, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**LAQUAN ALLEN,
a/k/a "Khabir"**

knowingly and intentionally possessed with the intent to distribute approximately 14 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).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section and 841(a)(1) set forth in this Indictment, defendant

**LAQUAN ALLEN,
a/k/a "Khabir"**

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; and
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. 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 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 defendant up to the value of the property subject to forfeiture.

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

A TRUE BILL:

FOREPERSON

Christine A. Apes for

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**