

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.	Filed Under Seal
v.	:	DATE FILED:	
WILLIAM DORSEY,	:	VIOLATIONS:	
a/k/a "Will,"	:	21 U.S.C. § 846 (conspiracy to distribute	
a/k/a "Sabor,"	:	cocaine and heroin – 1 count)	
KAREEM BANNISTER,	:	21 U.S.C. § 841(a)(1) (distribution of	
JAVAUGHN ANDERSON,	:	cocaine – 3 counts)	
a/k/a "Vaughny"	:	21 U.S.C. § 860(a) (distribution of cocaine	
	:	within 1,000 feet of a protected location –	
	:	2 counts)	
	:	21 U.S.C. 841(a)(1) (possession of cocaine	
	:	with the intent to distribute – 3 counts)	
	:	21 U.S.C. § 860(a) (possession of cocaine	
	:	with intent to distribute within 1,000 feet	
	:	of a protected location – 2 counts)	
	:	21 U.S.C. § 843(b) (unlawful use of a	
	:	communication facility in furtherance of	
	:	a drug felony - 2 counts)	
	:	18 U.S.C. § 2 (aiding and abetting)	
	:	Notice of forfeiture	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about November 22, 2013, through on or about January 17, 2014, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

WILLIAM DORSEY,
 a/k/a "Will,"
 a/k/a "Sabor," and
KAREEM BANNISTER

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of

heroin, a Schedule I controlled substance, and 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).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant WILLIAM DORSEY distributed cocaine to defendant KAREEM BANNISTER for resale.

3. Defendants WILLIAM DORSEY and KAREEM BANNISTER exchanged telephone calls and text messages in order to discuss the processing, packaging and selling of cocaine and heroin.

4. Defendants WILLIAM DORSEY and KAREEM BANNISTER discussed the price they should charge their cocaine customers.

5. Defendant WILLIAM DORSEY fronted cocaine to defendant KAREEM BANNISTER for resale and allowed defendant BANNISTER to pay for the cocaine at a later time.

6. Defendant KAREEM BANNISTER permitted defendant WILLIAM DORSEY to discuss the distribution of heroin with other drug associates of defendant BANNISTER.

7. Defendant KAREEM BANNISTER warned defendant WILLIAM DORSEY of the possibility of law enforcement officials' knowledge of defendant DORSEY's drug trafficking activities.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants WILLIAM DORSEY, KAREEM BANNISTER, and JAVAUGHN ANDERSON committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about November 22, 2013:

1. Defendant WILLIAM DORSEY used the telephone to offer defendant KAREEM BANNISTER 28 grams of cocaine for \$1,050.
2. Defendant WILLIAM DORSEY distributed 63 grams of cocaine to defendant KAREEM BANNISTER in the area of 301 E. 12th Street in Chester.

On or about November 25, 2013:

3. Defendant KAREEM BANNISTER used the telephone to order 63 grams of cocaine from defendant WILLIAM DORSEY.
4. Defendant WILLIAM DORSEY distributed 63 grams of cocaine to defendant JAVAUGHN ANDERSON for him to deliver to defendant KAREEM BANNISTER.
5. Defendant JAVAUGHN ANDERSON distributed 63 grams of cocaine to defendant KAREEM BANNISTER at 301 E. 12th Street in Chester.

On or about November 26, 2013:

5. Defendant KAREEM BANNISTER used the telephone to order 28 grams of cocaine from defendant WILLIAM DORSEY.
6. Defendant WILLIAM DORSEY distributed 28 grams of cocaine to defendant KAREEM BANNISTER in the city of Chester.

On or about November 28, 2013:

7. Defendants WILLIAM DORSEY and KAREEM BANNISTER used the telephone to discuss the price to charge a customer for two ounces of cocaine.

On or about November 29, 2013:

8. Defendant WILLIAM DORSEY used the telephone to discuss defendant KAREEM BANNISTER paying him money defendant BANNISTER owed on a drug debt.

9. Defendant KAREEM BANNISTER met defendant WILLIAM DORSEY to pay the money owed for the drug debt.

On or about November 30, 2013:

10. Defendant WILLIAM DORSEY used the telephone to collect payment on a drug debt that he was owed by defendant KAREEM BANNISTER.

On or about December 7, 2013:

11 Defendant WILLIAM DORSEY used the telephone to inform defendant KAREEM BANNISTER that he had obtained a good quality of heroin.

12. Defendant KAREEM BANNISTER used the telephone to connect defendant WILLIAM DORSEY with one of defendant BANNISTER's associates to discuss the distribution of heroin.

On or about January 16 and 17, 2014:

13. Defendant WILLIAM DORSEY distributed cocaine to an individual known to the grand jury.

14. Defendant KAREEM BANNISTER used the telephone to inform defendant WILLIAM DORSEY that his cocaine customer had been stopped by law enforcement and that the customer told police that he obtained the cocaine from "Will."

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor"**

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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor"**

knowingly and intentionally distributed approximately 63 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, Chester, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

KAREEM BANNISTER

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 FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

KAREEM BANNISTER

knowingly and intentionally possessed with the intent to distribute approximately 63 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, Chester, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
JAVAUGHN ANDERSON,
a/k/a "Vaughny"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 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), and Title 18 United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor” and
JAVAUGHN ANDERSON,
a/k/a “Vaughny”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 63 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Widener University, a private university, located at 1 University Place, Chester, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18 United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

KAREEM BANNISTER

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 NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

KAREEM BANNISTER

knowingly and intentionally possessed with the intent to distribute approximately 63 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, Chester, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor"**

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 ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

KAREEM BANNISTER

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 TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor," and
KAREEM BANNISTER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used the telephone to collect money owed by defendant BANNISTER, for narcotics that defendant BANNISTER obtained from defendant DORSEY for resale.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor," and
KAREEM BANNISTER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of heroin, in violation of Title 21, United States Code, Section 841(a)(1), in that defendants DORSEY and BANNISTER used the telephone to discuss the quality of heroin defendant DORSEY had just obtained for resale.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
KAREEM BANNISTER, and
JAVAUGHN ANDERSON,
a/k/a "Vaughny"**

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 offense.

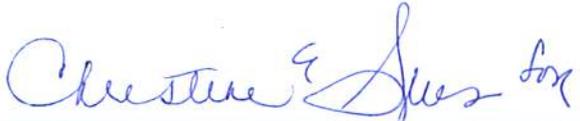
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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:



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY

GRAND JURY FOREPERSON