IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
WILLIAM DORSEY, a/k/a "Will," a/k/a "Sabor," NATHANIEL COLES, a/k/a "Big Bat," DONALD WOMACK, SR. a/k/a "Kas," a/k/a "Kasul," a/k/a "D-Rock"	: : : :	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute 500 grams or more of cocaine - 1 count) 21 U.S.C. § 843(b) (unlawful use of a communication facility in furtherance of a drug felony - 6 counts) Notice of forfeiture

Filed Under Seal

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about November 20, 2013 through on or about January 15, 2014, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
NATHANIEL COLES,
a/k/a "Big Bat," and
DONALD WOMACK, SR.
a/k/a "Kas,"
a/k/a "Kasul,"
a/k/a "D-Rock"

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 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)(B), (b)(1)(C).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. distributed cocaine to defendant NATHANIEL COLES for resale.

3. Defendants WILLIAM DORSEY and NATHANIEL COLES used the telephone to discuss the price they should charge cocaine customers.

4. Defendant NATHANIEL COLES delivered cocaine to a customer of defendant DONALD WOMACK, SR. that defendant WILLIAM DORSEY obtained for defendant WOMACK.

5. Defendant NATHANIEL COLES helped defendant WILLIAM DORSEY distribute cocaine by finding cocaine customers for defendant DORSEY.

6. Defendants WILLIAM DORSEY and NATHANIEL COLES discussed carrying a firearm to a drug transaction.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants WILLIAM DORSEY, NATHANIEL COLES, and DONALD WOMACK, SR. committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about November 20, 2013:

1. Defendant WILLIAM DORSEY and NATHANIEL COLES discussed getting cocaine from different suppliers.

On or about November 21, 2013:

2. Defendant WILLIAM DORSEY used the telephone to offer to distribute cocaine to defendant NATHANIEL COLES.

3. Defendants WILLIAM DORSEY and NATHANIEL COLES used the telephone to discuss the pricing and quality of the cocaine defendant DORSEY had for sale.

4. Defendant WILLIAM DORSEY and NATHANIEL COLES used the telephone to discuss obtaining cocaine from another source of supply.

5. Defendant NATHANIEL COLES used the telephone to discuss defendant WILLIAM DORSEY's future success in selling cocaine.

On or about November 22, 2013:

6. Defendant WILLIAM DORSEY used the telephone to order 56 grams of cocaine from defendant NATHANIEL COLES for resale.

7. Defendant NATHANIEL COLES informed defendant WILLIAM DORSEY that he was waiting to obtain 125 grams of cocaine for resale from defendant DONALD WOMACK, SR.

8. Defendant NATHANIEL COLES used the telephone to tell defendant WILLIAM DORSEY that he may have customers who want to buy the remaining two ounces of cocaine that defendant DORSEY has to sell.

9. Defendant WILLIAM DORSEY used the telephone to offer to distribute cocaine to defendant NATHANIEL COLES.

10. Defendants WILLIAM DORSEY and NATHANIEL COLES discussed defendant COLES waiting for defendant DONALD WOMACK, SR. to supply him with 250

grams of cocaine for resale to waiting customers.

11. Defendant WILLIAM DORSEY told defendant NATHANIEL COLES that he was also waiting on his source of supply, Paris Church, charged elsewhere, to bring him cocaine.

12. Defendant NATHANIEL COLES used the telephone to inform defendant WILLIAM DORSEY that he had a customer ready to purchase defendant DORSEY's remaining half-ounce of cocaine.

13. Defendants NATHANIEL COLES and WILLIAM DORSEY used the telephone to discuss defendant DORSEY being able to sell cocaine to his customers quickly in order to impress his supplier, Paris Church, charged elsewhere.

14. Defendant WILLIAM DORSEY advised defendant NATHANIEL COLES how to distribute cocaine in a manner that would reap the most profit.

15. Defendant NATHANIEL COLES used the telephone to arrange to meet defendant WILLIAM DORSEY at 313 E. 12th Street in Chester, in order for defendant DORSEY to distribute the 63 grams to defendant COLES for resale.

On or about November 23, 2013:

16. Defendant WILLIAM DORSEY used the telephone to try to arrange for defendant NATHANIEL COLES to purchase 250 grams of cocaine from defendant DORSEY's cocaine supplier, Paris Church, charged elsewhere, but defendant COLES said the price was too expensive.

On or about November 25, 2013:

17. Defendant WILLIAM DORSEY used the telephone to express his

displeasure with defendant NATHANIEL COLES for not purchasing the 250 grams of cocaine from defendant DORSEY's supplier.

On or about November 26, 2013:

18. Defendants WILLIAM DORSEY and NATHANIEL COLES discussed whether defendant DORSEY had obtained cocaine from his supplier and the price for defendant COLES to purchase some of the cocaine.

On or about November 27, 2013:

19. Defendant WILLIAM DORSEY used the telephone to discuss with defendant NATHANIEL COLES the quality of cocaine that defendant COLES had obtained with the assistance of defendant WOMACK, SR.

20. Defendants WILLIAM DORSEY and NATHANIEL COLES discussed the price defendant COLES intended to charge his customers for the cocaine.

21. Defendant WILLIAM DORSEY discussed whether defendant NATHANIEL COLES would be able to cook the cocaine down to increase the quantity for resale.

22. Defendant NATHANIEL COLES used the telephone to ask defendant WILLIAM DORSEY whether he was carrying a gun in order to accompany defendant COLES to conduct a drug transaction in another area.

23. Defendant WILLIAM DORSEY warned defendant NATHANIEL COLES that he should not conduct drug sales outside of their neighborhood.

On or about December 3, 2013:

24. Defendants WILLIAM DORSEY, NATHANIEL COLES and DONALD

WOMACK, SR. discussed defendant DORSEY obtaining 125 grams of cocaine from an individual known to the grand jury, on behalf of defendant WOMACK, SR. and then giving it to defendant COLES to distribute to defendant WOMACK, SR.'s drug customer.

On or about December 5, 2013:

25. Defendant NATHANIEL COLES used the telephone to ask defendant WILLIAM DORSEY whether he had cocaine for resale to a customer whom defendant COLES had arranged to purchase from defendant DORSEY.

On or about December 6, 2013:

26. Defendants WILLIAM DORSEY and NATHANIEL COLES used the telephone to discuss whether defendant DORSEY had been resupplied with cocaine for sale. Defendant DORSEY did not have cocaine, but had obtained heroin for sale.

27. Defendant NATHANIEL COLES used the telephone to ask defendant WILLIAM DORSEY the price for 10 bundles of heroin.

On or about December 7, 2013:

28. Defendants WILLIAM DORSEY and NATHANIEL COLES used the telephone to discuss a potential drug customer who said defendant DORSEY's prices were too expensive.

On or about December 10, 2013:

29. Defendant NATHANIEL COLES used the telephone to ask whether defendant WILLIAM DORSEY had cocaine for sale, but defendant DORSEY had already sold all of his cocaine.

On or about January 14, 2014:

30. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. used the telephone to discuss that defendant NATHANIEL COLES was waiting for defendant WOMACK, SR. to supply him with cocaine for resale.

On or about January 15, 2014:

31. Defendant NATHANIEL COLES used the telephone to ask when defendant WILLIAM DORSEY would be able to supply defendant COLES with more cocaine to sell.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
NATHANIEL COLES,
a/k/a "Big Bat"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, conspiracy to distribute cocaine, in violation of Title 21, United States Code, Section 846, in that defendant COLES used the telephone to discuss assisting defendant DORSEY in distributing ounce-quantities of cocaine, a Schedule II controlled substance.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
NATHANIEL COLES,
a/k/a "Big Bat"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession of cocaine with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendants COLES and DORSEY discussed distributing 181 grams of cocaine, a Schedule II controlled substance.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
NATHANIEL COLES,
a/k/a "Big Bat"

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 COLES used the telephone to obtain 63 grams of cocaine, a Schedule II controlled substance, from defendant DORSEY for resale.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
NATHANIEL COLES,
a/k/a "Big Bat"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession of cocaine with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendants DORSEY and COLES used the telephone to discuss the distribution of cocaine, a Schedule II controlled substance, that defendant COLES received from DONALD WOMACK, SR. for resale.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor" and
NATHANIEL COLES,
a/k/a "Big Bat"

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 COLES used the telephone to discuss defendant DORSEY accompanying him to sell 28 grams of cocaine, a Schedule II controlled substance, to a customer.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
NATHANIEL COLES,
a/k/a "Big Bat," and
DONALD WOMACK, SR.
a/k/a "Kas,"
a/k/a "Kasul,"
a/k/a "D-Rock"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendants DORSEY, COLES and WOMACK, SR. used the telephone to discuss distributing 125 grams of cocaine, a Schedule II controlled substance, to a drug customer of defendant WOMACK, SR..

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 violations of Title 21, United States Code, Sections 846, and 843(b), set forth in this indictment, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
NATHANIEL COLES,
a/k/a "Big Bat," and
DONALD WOMACK, SR.
a/k/a "Kas,"
a/k/a "Kasul,"
a/k/a "D-Rock"

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:

GRAND JURY FOREPERSON

Christine E Jones for

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY