IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED: Filed Under Seal
WILLIAM DORSEY, a/k/a "Will," a/k/a "Sabor," LAMONT CARTER, SOLOMON WHITAKER, a/k/a "Chum," a/k/a "Chunks," NAIM BUTLER, a/k/a "Nai"	:	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute 100 grams or more of heroin and cocaine– 1 count) 21 U.S.C. § 841(a)(1) (distribution of heroin – 3 counts) 21 U.S.C. § 860(a) (distribution of heroin within 1,000 feet of a protected location - 3 counts) 21 U.S.C. § 841(a)(1) (distribution of cocaine – 3 counts) 21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine – 3 counts) 21 U.S.C. § 860(a) (distribution of cocaine within 1,000 feet of a protected location – 2 counts) 21 U.S.C. § 860(a) (possession with intent to distribute cocaine 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 – 3 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 21, 2013 through on or about December 14, 2013, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

LAMONT CARTER, and
SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks,"

conspired and agreed together, and with defendant William Dorsey, charged elsewhere, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 100 grams or more 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)(B), 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. Defendants LAMONT CARTER and SOLOMON WHITAKER supplied heroin to William Dorsey for resale.

3. Defendant William Dorsey supplied cocaine to defendants LAMONT CARTER and SOLOMON WHITAKER for resale.

4. Defendants LAMONT CARTER and SOLOMON WHITAKER, and William Dorsey exchanged telephone calls and text messages to discuss the processing, packaging and selling of heroin and cocaine.

5. Defendants LAMONT CARTER and SOLOMON WHITAKER, and William Dorsey assisted one another in finding customers for their narcotics.

6. Defendant SOLOMON WHITAKER and William Dorsey discussed obtaining heroin from a supplier with better quality heroin.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants LAMONT CARTER and SOLOMON WHITAKEER, and William Dorsey committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about November 21, 2013:

1. William Dorsey used the telephone to order 35 grams of heroin from defendant LAMONT CARTER.

2. Defendant LAMONT CARTER distributed approximately 35 grams of heroin to William Dorsey at 301 E. 12th Street in Chester for resale.

3. William Dorsey distributed approximately 98 grams of cocaine to defendant LAMONT CARTER at 301 E. 12th Street in Chester, for resale.

4. Defendant LAMONT CARTER used the telephone to inform William Dorsey that he had been stopped by law enforcement and abandoned the cocaine he had obtained from DORSEY.

5. Defendant LAMONT CARTER used the telephone to order two ounces of cocaine from William Dorsey for resale.

6. William Dorsey distributed approximately 56 grams of cocaine, which had been ordered by defendant LAMONT CARTER, to defendant SOLOMON WHITAKER for resale.

On or about November 22, 2013:

7. Defendant LAMONT CARTER used the telephone to order 28 grams of cocaine from William Dorsey for resale.

8. Defendants William Dorsey and NAIM BUTLER distributed approximately 28 grams of cocaine to defendant LAMONT CARTER at 301 E. 12th Street in Chester, for resale.

9. William Dorsey used the telephone to offer cocaine to defendant LAMONT CARTER.

10. William Dorsey distributed approximately 56 grams of cocaine to defendant LAMONT CARTER for resale.

On or about November 29, 2013:

11. William Dorsey used the telephone to call a friend of defendant LAMONT CARTER for the phone number of defendant SOLOMON WHITAKER for the purpose of ordering heroin while defendant CARTER was unavailable.

12. Defendant SOLOMON WHITAKER used the telephone to inform William Dorsey that he would distribute heroin to Dorsey while defendant CARTER was unavailable.

13. Defendant SOLOMON WHITAKER and William Dorsey used the telephone to negotiate the price of heroin per gram.

14. William Dorsey ordered 35 grams of heroin from defendant SOLOMON WHITAKER.

15. Defendant SOLOMON WHITAKER distributed approximately 35 grams of heroin to William Dorsey in the area of 301 E. 12th Street in Chester for resale.

16. On or about December 4, 2013, William Dorsey used the telephone to order 50 grams of heroin from defendant SOLOMON WHITAKER.

17. On or about December 5, 2013, defendant SOLOMON WHITAKER distributed approximately 50 grams of heroin to William Dorsey in the area of 301 E. 12th Street in Philadelphia for resale.

18. On or about December 10, 2013, William Dorsey used the telephone to inform defendant SOLOMON WHITAKER that he had high quality heroin that would be supplied to Dorsey by a person known to the grand jury.

On or about December 11, 2013:

19. William Dorsey used the telephone to offer to sell the better quality heroin to defendant SOLOMON WHITAKER.

20. William Dorsey used the telephone to advise defendant SOLOMON WHITAKER how to process and repackage heroin in a manner that would allow defendant WHITAKER to triple his profit.

21. On or about December 14, 2013, defendant SOLOMON WHITAKER used the telephone to ask William Dorsey the price for an ounce of cocaine.

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, defendant

LAMONT CARTER

knowingly and intentionally distributed approximately 35 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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

LAMONT CARTER

knowingly and intentionally distributed approximately 35 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I 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 21, 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 98 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 21, 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 98 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 21, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

LAMONT CARTER

knowingly and intentionally possessed with the intent to distribute approximately 98 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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

LAMONT CARTER

knowingly and intentionally possessed with the intent to distribute approximately 98 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 EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

LAMONT CARTER

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 defendant CARTER used the telephone to order from a person known to the grand jury 56 grams of cocaine, a Schedule II controlled substance, for resale by defendant CARTER.

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

COUNT NINE

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
NAIM BUTLER,
a/k/a "Nai"

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

COUNT TEN

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
NAIM BUTLER,
a/k/a "Nai"

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 28 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), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

LAMONT CARTER

knowingly and intentionally possessed with the 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 22, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

LAMONT CARTER

knowingly and intentionally possessed with the intent to distribute approximately 28 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 THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 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 56 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 FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

LAMONT CARTER

knowingly and intentionally possessed with the intent to distribute approximately 56 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 FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally distributed approximately 35 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 SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally distributed approximately 35 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I 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 SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 5, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally distributed approximately 50 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 EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 5, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally distributed approximately 50 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I 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 NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor," and
SOLOMON WHITAKER
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession of heroin with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendants KING and DORSEY used the telephone to discuss purchasing, a Schedule I controlled substance, from an individual known by the grand jury, for resale.

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

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks"

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession of heroin with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant WHITAKER used the telephone to inquire about the price of 28 grams of cocaine, a Schedule II controlled substance, 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 violations 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,"
LAMONT CARTER,
SOLOMON WHITAKER,
a/k/a "Chum,"
a/k/a "Chunks," and
NAIM BUTLER,
a/k/a "Nai"

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 G. Ayers for

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY