

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

Filed Under Seal

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
AL-GHANI RASHEED : VIOLATIONS:
: 21 U.S.C. § 841(a)(1) (possession with the
: intent to distribute cocaine base (“crack”)
: - 3 counts)
: 21 U.S.C. § 843(b) (unlawful use of a
: communication facility in furtherance of
: a drug felony – 1 count)
Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 20, 2013, in Chester, in the Eastern District of
Pennsylvania, defendant

AL-GHANI RASHEED

knowingly and intentionally possessed with the intent to distribute approximately 10.5 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 TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

AL-GHANI RASHEED

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession of cocaine base (“crack”) with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant RASHEED used the telephone to order one ounce of cocaine base (“crack”), for resale by defendant RASHEED, from a person known to the grand jury.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

AL-GHANI RASHEED

knowingly and intentionally possessed with the intent to distribute approximately 10.5 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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

AL-GHANI RASHEED

knowingly and intentionally possessed with the intent to distribute approximately 24.5 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).

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 843(b) set forth in this Indictment, defendant

AL-GHANI RASHEED

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

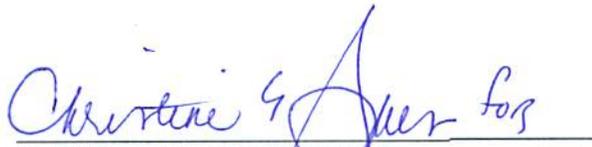
(e) has been commingled with other property which cannot be divided without difficulty;

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



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY