

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:**  
**KEITH STROUD** : **VIOLATIONS:**  
: **21 U.S.C. § 841(a)(1)**  
: **(possession with intent to distribute**  
: **heroin - 1 count)**  
: **18 U.S.C. § 924(c)(1) (possession of a**  
: **firearm in furtherance of a drug**  
: **trafficking crime - 1 count)**  
: **18 U.S.C. § 922(g) (possession of a firearm**  
: **by a convicted felon - 1 count)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or January 16, 2014, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**KEITH STROUD**

knowingly and intentionally possessed with intent to distribute 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 TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 16, 2014, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**KEITH STROUD**

knowingly possessed two firearms, that is, a Glock, model 27, semi-automatic .40 caliber .9 pistol, serial #KCL659, loaded with 15 live rounds of ammunition, and a Glock, model 22, semi-automatic .40 caliber pistol, serial # UXD372, loaded with 22 live rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with the intent to distribute heroin, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 16, 2014, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**KEITH STROUD,**

having been convicted in the Superior Court of the State of Delaware of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Glock, model 27, semi-automatic .40 caliber .9 pistol, serial #KCL659, loaded with 15 live rounds of ammunition, and a Glock, model 22, semi-automatic .40 caliber pistol, serial # UXD372, loaded with 22 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT :**

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), defendant

**KEITH STROUD**

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;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to:

i) \$427 United States Currency

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.

3. As a result of violations of Title 18, United States Code, Sections 924 (c)(1) and 922 (g)(1) set forth in this indictment, defendant

**KEITH STROUD**

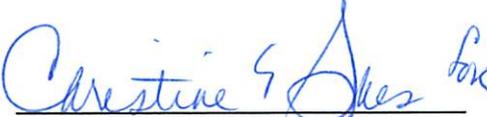
shall forfeit to the United States of America, the firearms and ammunition involved in the commission of this offense, including, but not limited to:

- (a) a Glock, model 27, semi-automatic .40 caliber .9 pistol, serial #KCL659;
- (b) 15 rounds of ammunition;
- (c) a Glock, model 22, semi-automatic .40 caliber pistol, serial #UXD372;  
and,
- (d) 22 rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

  
\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
**United States Attorney**