

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 14-
v.	:	DATE FILED: _____
WILLIAM DORSEY, (1) a/k/a "Will," a/k/a "Sabor,"	:	21 U.S.C. § 846 (conspiracy to distribute 280 grams or more of cocaine base ("crack"), 500 grams or more of cocaine, and 100 grams or more of heroin – 1 count)
DONALD WOMACK, SR., (2) a/k/a "Kas," a/k/a "Kasul," a/k/a "D-Rock,"	:	21 U.S.C. § 846 (conspiracy to possess with intent to distribute marijuana – 1 count)
PARIS CHURCH, (3) a/k/a "Pay May," a/k/a "Pay,"	:	21 U.S.C. § 846 (attempted possession with intent to distribute marijuana – 1 count)
BRAHEEM EDWARDS, (4) a/k/a "Broddie,"	:	21 U.S.C. § 841(a)(1) (distribution of 28 grams or more of cocaine base ("crack") – 4 counts)
NAIM BUTLER, (5) a/k/a "Nai,"	:	21 U.S.C. § 841(a)(1) (distribution of 100 grams or more of heroin – 1 count)
RONELL WHITEHEAD, (6) a/k/a "R,"	:	21 U.S.C. § 841(a)(1) (distribution of cocaine base ("crack") – 62 counts)
MICHAEL LEWIS, (7) a/k/a "Maybach" a/k/a "Miz" a/k/a "Mitite,"	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine base ("crack") – 3 counts)
BREON BURTON, (8) a/k/a "Bre,"	:	21 U.S.C. § 841(a)(1) (distribution of cocaine base ("crack") and heroin – 5 counts)
JAVAUGHN ANDERSON, (9) a/k/a "Vaughny,"	:	21 U.S.C. § 841(a)(1) (distribution of cocaine and heroin – 1 count)
ROBERT DUSON, (10) a/k/a "Rob,"	:	21 U.S.C. § 841(a)(1) (distribution of cocaine – 14 counts)
SPENCER PAYNE, (11) a/k/a "Boodine," a/k/a "Nur,"	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine – 5 counts)
SATCHEL JOHNSON, (12) a/k/a "Satch," a/k/a "S,"	:	21 U.S.C. § 841(a)(1) (distribution of heroin – 21 counts)
ALONZO JONES, (13) a/k/a "Cuddie," a/k/a "Cuddy," a/k/a "Jizzle,"	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute heroin – 3 counts)
JAMEAR MCGURN, (14)	:	21 U.S.C. § 860(a) (distribution of controlled substances within 1,000 feet a playground/school – 91 counts)

a/k/a "Biggie,"		21 U.S.C. § 860(a) (possession with intent
CLASSIE MAE DORSEY, (15)	:	to distribute controlled substances
HERMAN PURNELL, (16)	:	within 1,000 feet of a school – 1 count)
DONDRE ELLIS, (17)	:	18 U.S.C. § 861(a) (use of a juvenile in a
a/k/a "Little Don,"	:	drug trafficking offense – 1 count)
a/k/a "Dre,"	:	21 U.S.C. § 856 (maintaining a drug house
a/k/a "Billy,"	:	– 1 count)
ERVEN TOWERS-ROLON, (18)	:	21 U.S.C. § 843(b) (unlawful use of a
a/k/a "Erv,"	:	communication facility in furtherance of
JOHN DENNIS, (19)	:	a drug felony – 39 counts)
a/k/a "Zelly,"	:	18 U.S.C. § 924(c) (possession of a firearm
CHARLES STANSBURY, (20)	:	in furtherance of a drug trafficking crime
WAALI SHEPHERD, (21)	:	– 2 counts)
a/k/a "Bub,"	:	18 U.S.C. § 922(g) (felon in possession of a
KAREEM YORK, (22)	:	firearm – 4 counts)
a/k/a "Pedie"	:	18 U.S.C. § 2 (aiding and abetting)
		Notices of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about September 2012 to on or about September 23, 2014, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

WILLIAM DORSEY,
 a/k/a "Will,"
 a/k/a "Sabor,"
DONALD WOMACK, SR.,
 a/k/a "Kas,"
 a/k/a "Kasul,"
 a/k/a "D-Rock,"
PARIS CHURCH,
 a/k/a "Pay May,"
 a/k/a "Pay,"
BRAHEEM EDWARDS,
 a/k/a "Broddie,"
NAIM BUTLER,
 a/k/a "Nai,"
RONELL WHITEHEAD,
 a/k/a "R,"
MICHAEL LEWIS,

**a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”
BREON BURTON,
a/k/a “Bre,”
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”
ROBERT DUSON,
a/k/a “Rob,”
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”
SATCHEL JOHNSON,
a/k/a “Satch,”
a/k/a “S,”
ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”
JAMEAR MCGURN,
a/k/a “Biggie,”
CLASSIE MAE DORSEY,
HERMAN PURNELL,
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”
ERVEN TOWERS-ROLON,
a/k/a “Erv,”
JOHN DENNIS,
a/k/a “Zelly,”
CHARLES STANSBURY,
WAALI SHEPHERD,
a/k/a “Bub,” and
KAREEM YORK,
a/k/a “Pedie”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute controlled substances, that is, a mixture and substance containing a detectable amount of cocaine base (“crack”), and a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances, 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).

2. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), 500 grams or more of a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances; and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendants **WILLIAM DORSEY, PARIS CHURCH, BRAHEEM EDWARDS, JAVAUGHN ANDERSON, ROBERT DUSON**, and **SATCHEL JOHNSON**, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B).

3. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendants **DONALD WOMACK, SR., ALONZO JONES**, and **DONDRE ELLIS**, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C).

4. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances, is attributable to and was reasonably

foreseeable to defendants **NAIM BUTLER, RONELL WHITEHEAD, and MICHAEL LEWIS,** in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B).

5. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, 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, is attributable to and was reasonably foreseeable to defendant **BREON BURTON,** in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(C).

6. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants **JOHN DENNIS, SPENCER PAYNE and JAMEAR MCGURN,** in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

7. It is further alleged that, with respect to the conspiracy charged in this Count, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendant **CLASSIE MAE DORSEY,** in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

8. It is further alleged that, with respect to the conspiracy charged in this Count, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture and substance containing a

detectable amount of heroin, a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendants **ERVEN TOWERS-ROLON** and **CHARLES STANSBURY**, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

9. It is further alleged that, with respect to the conspiracy charged in this Count, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendant **HERMAN PURNELL**, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

10. It is further alleged that, with respect to the conspiracy charged in this Count, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants **WAALI SHEPHERD** and **KAREEM YORK**, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was part of the conspiracy that:

11. Defendant **WILLIAM DORSEY** was the leader and organizer of a cocaine, crack cocaine, and heroin distribution group that operated in the “Rose and Upland” neighborhood in the city of Chester, in Delaware County, Pennsylvania (referred to by various names, including “300 Rose” and “Rose n Upland;” hereinafter referred to as the “Rose and Upland Drug Trafficking Group” (DTG)). From in or about September 2012, to on or about September 23, 2014, the Rose and Upland Drug Trafficking Group (“DTG”) distributed in excess of 280 grams of crack cocaine, 500 grams of cocaine, and 100 grams or more of heroin.

12. Defendant **WILLIAM DORSEY**, and others known and unknown to the grand jury, obtained quantities of cocaine ranging from 125 grams up to 500 grams from suppliers,

including defendant PARIS CHURCH and others, both outside and within the Eastern District of Pennsylvania.

13. Defendant WILLIAM DORSEY sold the cocaine supplied by defendant PARIS CHURCH and others himself, and also supplied the cocaine to other members of his DTG, including: defendants BRAHEEM EDWARDS, NAIM BUTLER, RONELL WHITEHEAD, MICHAEL LEWIS, BREON BURTON, JAVAUGHN ANDERSON, ROBERT DUSON, SPENCER PAYNE, SATCHELL JOHNSON, ALONZO JONES, JAMEAR MCGURN, DONDRE ELLIS, and JOHN DENNIS, as well as J.S. and J.L., male juveniles known to the grand jury, and others known and unknown to the grand jury, to sell.

14. Defendant WILLIAM DORSEY also converted or “cooked” cocaine into crack cocaine, and had others do so for him, and then sold the crack cocaine himself, and supplied the crack cocaine to other members of the DTG, including: defendants BRAHEEM EDWARDS, NAIM BUTLER, RONELL WHITEHEAD, MICHAEL LEWIS, BREON BURTON, JAVAUGHN ANDERSON, ROBERT DUSON, SPENCER PAYNE, SATCHELL JOHNSON, ALONZO JONES, JAMEAR MCGURN, DONDRE ELLIS, and JOHN DENNIS, as well as J.S. and J.L., and others known and unknown to the grand jury, to sell.

15. Defendant PARIS CHURCH supplied defendant WILLIAM DORSEY with cocaine for defendant DORSEY to sell or to convert or “cook” into crack cocaine to sell.

16. Defendants WILLIAM DORSEY and ROBERT DUSON converted or “cooked” cocaine into crack cocaine inside a residence located at 313 E. 12th Street, known to the DTG as “The Spot” or the “The Palace,” in Chester.

17. Defendant WILLIAM DORSEY allowed defendants JAVAUGHN ANDERSON, BRAHEEM EDWARDS, ROBERT DUSON, NAIM BUTLER, SATCHELL

JOHNSON, and ALONZO JONES to store crack cocaine in and distribute crack cocaine out of this residence, which served as a “stash” house for the DTG.

18. Defendant PARIS CHURCH and others supplied defendant WILLIAM DORSEY with heroin for defendant DORSEY to sell.

19. Defendant WILLIAM DORSEY processed and packaged the heroin inside the residence of defendant CLASSIE MAE DORSEY, located at 139 W. 22nd Street in Chester, known to the DTG as “The Lab.”

20. Defendant WILLIAM DORSEY used defendants CLASSIE MAE DORSEY and HERMAN PURNELL to store and distribute heroin out of 139 W. 22nd Street.

21. Members of the DTG, including defendants WILLIAM DORSEY, BRAHEEM EDWARDS, NAIM BUTLER, RONELL WHITEHEAD, MICHAEL LEWIS, BREON BURTON, JAVAUGHN ANDERSON, ROBERT DUSON, SPENCER PAYNE, SATCHELL JOHNSON, ALONZO JONES, JAMEAR MCGURN, DONDRE ELLIS, JOHN DENNIS, CHARLES STANSBURY, ERVEN TOWERS-ROLON, WAALI SHEPHERD, and KAREEM YORK, J.S. and J.L., and others both known and unknown to the grand jury, distributed cocaine, crack cocaine, and heroin, to customers both inside and outside the Rose and Upland DTG’s geographic territory, which was primarily bordered by Avenue of the States (Route 352) to the West, 12th Street to the North, Morton Avenue to the East, and 9th Street to the South. These streets included the 300 block of Rose Street and the 1100 block of Upland Street. A large part of the territory of the “Rose and Upland” neighborhood within which members of the Rose and Upland DTG distributed, and possessed with intent to distribute, cocaine, crack cocaine, and heroin, was located within 1,000 feet of the real property comprising Widener University, located at 1 University Place, Chester, Pennsylvania.

22. Customers of the Rose and Upland DTG who purchased cocaine, crack cocaine, and other illegal controlled substances inside its territory would walk, drive, or bicycle to the Rose and Upland neighborhood to purchase drugs. Members of the Rose and Upland DTG often hid the drugs that they were selling in various “stash” locations near where they were selling, in order to avoid having drugs on their person in the event police were in the area or police stopped them. Those stash locations included abandoned houses, alley ways, playgrounds, trash cans, mailboxes, windowsills, and other locations in the Rose and Upland neighborhood. Members of the DTG tried to get customers to buy from them individually, or sold drugs in concert with each other, with multiple members providing “pieces” – usually small bags of cocaine or crack cocaine that were sold for \$10 and \$20, with increased dollar value correlating to increased quantity of drugs, and sometimes were sold in larger amounts, including, eighth-ounce, quarter-ounce, and half-ounce quantities. When drugs were sold by multiple members in concert with each other, each participating member would receive a portion of the profits from the sale that was relative to his contribution of drugs to the sale.

23. Members of Rose and Upland DTG used residences in Chester as “stash houses” to store and package cocaine, crack cocaine, and heroin for distribution. These houses included 313 E. 12th Street and 139 W. 22nd Street, as well as some abandoned properties.

24. Members of the Rose and Upland DTG used juveniles, including but not limited to J.L. and J.S., to sell controlled substances to customers of the DTG.

25. Members of the DTG used drug addicts from the area, including but not limited to, J.F., J.B. and A.O., persons known to the grand jury, to assist in making drug sales and to test heroin for the level of potency (“quality”).

26. Members controlled the drug sales in the Rose and Upland geographic territory, and did not permit non-DTG members to sell drugs in that territory.

27. To protect their territory and drug trafficking activities, members of the Rose and Upland DTG routinely carried, and sometimes used, loaded firearms or had firearms available in hidden locations, including the “stash” house at 313 E. 12th Street.

28. Members of the Rose and Upland DTG routinely warned each other of the presence of law enforcement in the area and used counter-surveillance tactics to prevent detection by law enforcement.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the defendants and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about August 12, 2012, inside Ess’s Bar, 1123 Madison Street in Chester, members of the Rose and Upland DTG stored the following items:

- One Remington Wingmaster, 12-gauge shotgun, Model 870, Serial No. T301158V;
- One Hi-Point 9mm Luger semi-automatic pistol, Model C-9, Serial No. 1649502;
- One AMT .380 caliber semiautomatic pistol, Model Back Up, with an obliterated serial number;
- One grey plastic Ruger firearms case containing one silver metal Ruger magazine assembly with a capacity of 15, and 15 9mm Federal Luger cartridges;

- One silver metal Ruger magazine capacity 15, and 12 9mm Federal cartridges;
- One silver metal magazine assembly capacity 12, and 9mm Luger cartridges;
- One black metal Astra magazine assembly capacity 15, and 9mm Luger cartridges;
- One factory box containing 16 S&B 9mm Luger cartridges;
- One factory box containing 39 Russian Makarov 9mm cartridges;
- 13 Winchester, 4 Federal, and 2 PMC .380 caliber cartridges;
- 14 PMC and 2 CBC 9mm Luger cartridges;
- Clear plastic baggies with numerous clear plastic vials with green tops containing suspected crack cocaine;
- Four clear plastic baggies containing white powder; and
- Numerous new and unused clear plastic baggies.

2. On or about September 26, 2012, in the 400 block of Rose Street in Chester, defendant DONDRE ELLIS distributed approximately 0.46 grams of crack cocaine to a confidential source known to the grand jury ("CS-1") for \$120.

On or about October 23, 2012:

3. In the 300 block of 11th Street in Chester, D.W., Jr., distributed approximately 0.98 grams of crack cocaine to a confidential source known to the grand jury ("CS-2") for \$190.

4. In the 1000 block of Madison Street in Chester, J.S., a juvenile, distributed approximately 0.32 grams of crack cocaine to CS-2 for \$35.

5. On or about November 16, 2012, at the intersection of 11th and Upland Streets in Chester, defendants ERVEN TOWERS-ROLON and KAREEM YORK, and J.S., a juvenile, distributed approximately 0.85 grams of crack cocaine to a CS-2 for \$100.

6. On or about December 20, 2012, in the 300 block of Rose Street in Chester, defendants WAALI SHEPHERD and KAREEM YORK and a male unknown to the grand jury possessed the following firearms:

- Black Taurus .40 caliber handgun, Serial No. SYI35556, loaded with 10 live rounds of ammunition;
- Intratec Tec-9 handgun, Serial No. 46323, loaded with 19 live rounds of ammunition; and
- Black Pietro Beretta 9mm handgun, Serial No. D331782, loaded with 10 live rounds of ammunition.

7. On or about January 9, 2013, in the residence located at 18 W. 22nd Street in Chester, defendant NAIM BUTLER possessed a Glock .40 caliber handgun, Serial No. KNZ-783, and a Glock magazine loaded with 12 live rounds of ammunition.

8. On or about January 31, 2013, in the 1100 block of Curry Street in Chester, defendant BREON BURTON distributed approximately 0.26 grams of heroin to a police officer acting in an undercover capacity known to the grand jury ("UC-1") for \$60.

9. On or about February 5, 2013, in the 1100 block of Curry Street in Chester, defendant BREON BURTON distributed approximately 0.22 grams of heroin to UC-1 for \$60.

10. On or about February 7, 2013, in the 1100 block of Curry Street in Chester, defendant BREON BURTON distributed approximately 0.41 grams of heroin to UC-1 for \$60.

11. On or about February 11, 2013, in the 300 block of Rose Street in Chester, defendant ALONZO JONES and J.F., a drug addict from the Rose and Upland neighborhood, distributed approximately 0.47 grams of crack cocaine to CS-1 for \$100.

12. On or about February 19, 2013, in the 1100 block of Curry Street in Chester, defendant BREON BURTON distributed approximately 0.14 grams of heroin to UC-1 for \$60.

13. On or about February 21, 2013, in the 300 block of Rose Street in Chester, defendants ERVEN TOWERS-ROLON, JAVAUGHN ANDERSON and WAALI SHEPHERD distributed approximately 0.67 grams of crack cocaine to CS-2 for \$80.

14. On or about February 26, 2013, in the 500 block of Rose Street in Chester, defendant ERVEN TOWERS-ROLON distributed approximately 1.5 grams of crack cocaine to CS-2 for \$110.

15. On or about February 27, 2013, in the 1100 block of Curry Street in Chester, defendant BREON BURTON distributed approximately 0.42 grams of crack cocaine and approximately 0.23 grams of heroin to UC-1 for \$180.

16. On or about March 5, 2013, in the 1100 block of Upland Street in Chester, defendant ERVEN TOWERS-ROLON distributed approximately 0.68 grams of crack cocaine and approximately 0.16 grams of heroin to CS-2 for \$130.

17. On or about March 7, 2013, in the 300 block of Rose Street in Chester, defendant ERVEN TOWERS-ROLON possessed with the intent to distribute approximately 0.51 grams of crack cocaine.

18. On or about March 11, 2013, in the 300 block of Rose Street in Chester, defendant BREON BURTON distributed approximately 3.2 grams of crack cocaine and approximately 0.38 grams of heroin to UC-1 for \$270.

19. On or about March 26, 2013, in the area of 1001 Upland Street in Chester, members of the Rose and Upland DTG, E.P., M.H., and J.S., a juvenile, who are known to the grand jury, possessed the following firearms: a black H&R .22 caliber revolver, Serial #AD55588, loaded with 9 live rounds of ammunition, and a black American Arms .22 caliber semi-automatic firearm, Model P98, Serial # 030264, loaded with 3 live rounds of ammunition.

On or about March 27, 2013:

20. In the 1100 block of Upland Street in Chester, defendant BREON BURTON distributed approximately 0.74 grams of crack cocaine to a confidential source known to the grand jury ("CS-3") for \$40.

21. In the area of 332 Rose Street in Chester, members of the Rose and Upland DTG stored or "stashed" approximately 1.1 grams of crack cocaine and approximately 1.5 grams of cocaine.

On or about March 28, 2013:

22. In the 1000 block of Upland Street in Chester, defendant CHARLES STANSBURY distributed approximately 0.21 grams of heroin to CS-2 for \$80.

23. In the 300 block of 11th Street in Chester, defendant CHARLES STANSBURY and J.S., a juvenile, distributed approximately 0.18 grams of crack cocaine to CS-2 for \$30.

24. In the 1100 block of Upland Street in Chester, defendant BREON BURTON distributed approximately 3.3 grams of crack cocaine and approximately 0.54 grams of heroin to UC-1 for \$270.

25. On or about April 2, 2013, at 1576 Chester Pike, Eddystone, Pennsylvania, defendant CHARLES STANSBURY distributed approximately 0.79 grams of crack cocaine to CS-2 for \$180.

On or about April 4, 2013:

26. In the 300 block of 12th Street, defendant CHARLES STANSBURY distributed approximately 0.99 grams of crack cocaine to CS-2 for \$135.

27. In the 1100 block of Upland Street in Chester, defendant BREON BURTON distributed approximately 9.6 grams of crack cocaine and approximately 0.37 grams of heroin to UC-1 for \$675.

28. On or about April 9, 2013, on the side of the residence at 1007 Upland Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 0.23 grams of heroin.

29. On or about April 10, 2013, in the rear of 1124 Upland Street and 330 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 12.4 grams of crack cocaine.

30. On or about April 16, 2013, in the playground in the 1100 block of Upland Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 1.0 gram of crack cocaine.

31. On or about April 18, 2013, in the 400 block of Bickley Place in Chester, defendant BREON BURTON distributed approximately 13.9 grams of cocaine and approximately 0.32 grams of heroin to UC-1 for \$700.

32. On or about April 30, 2013, at 1135 Upland Street in Chester, defendant BREON BURTON possessed the following:

- Silver Hopkins & Allen .32 caliber revolver, Model 1901, Serial No. D431, loaded with 6 live rounds of ammunition;
- Black H&R .32 caliber revolver, Model 732, (Serial No. obliterated), loaded with 5 live rounds of ammunition; and

-- Approximately 0.78 grams of crack cocaine.

33. On or about May 3, 2013, in 400 block of Bickley Place in Chester, defendant JAVAUGHN ANDERSON, at the direction of defendant BREON BURTON, distributed approximately 6.5 grams of crack cocaine to UC-1 for \$580.

On or about May 15, 2013:

34. In the 300 block of Rose Street in Chester, defendants ALONZO JONES and DONDRE ELLIS distributed approximately 1.1 grams of crack cocaine to a confidential source known to the grand jury ("CS-4") for \$100.

35. In the 300 block of Rose Street in Chester, defendant NAIM BUTLER distributed approximately 0.75 grams of crack cocaine to a confidential source known to the grand jury ("CS-5") for \$100.

36. On or about May 21, 2013, in the 300 block of Rose Street in Chester, defendants NAIM BUTLER and RONELL WHITEHEAD distributed approximately 2.2 grams of crack cocaine to CS-5 for \$170.

37. On or about May 23, 2013, in the 300 block of Rose Street in Chester, defendant SPENCER PAYNE distributed approximately 1.5 grams of crack cocaine to CS-4 for \$130.

38. On or about May 28, 2013, in the 300 block of Rose Street in Chester, defendant ALONZO JONES distributed approximately 1.5 grams of crack cocaine to CS-4 for \$120.

On or about June 3, 2013:

39. In the 300 block of 11th Street in Chester, defendant CHARLES STANSBURY distributed approximately 0.14 grams of heroin to UC-1 for \$60.

40. In the 300 block of Rose Street in Chester, defendant DONDRE ELLIS distributed approximately 2.6 grams of crack cocaine to CS-5 for \$100.

41. In the 300 block of Rose Street in Chester, defendant NAIM BUTLER distributed approximately 1.2 grams of crack cocaine to CS-5 for \$100.

On or about June 12, 2013:

42. In the 300 block of Rose Street in Chester, defendants RONELL WHITEHEAD and SPENCER PAYNE distributed approximately 1.1 grams of crack cocaine to a confidential source known to the grand jury (“CS-6”) for \$80.

43. In the 300 block of Rose Street in Chester, defendant NAIM BUTLER distributed approximately 3.1 grams of crack cocaine to CS-5 for \$170.

44. In the area of 332 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 6.4 grams of crack cocaine and approximately 0.12 grams of heroin.

45. On or about June 17, 2013, in the playground in the 1100 block of Upland Street in Chester, J.S., a juvenile, possessed the following:

- Approximately 2.47 grams of cocaine;
- Silver Sterling Arms .380 caliber handgun, Model Mark 3, Serial No. G53133, loaded with 7 live rounds of ammunition; and
- Black Browning Arms .22 caliber long rifle, Model Challenger 2, Serial No. 655PM04913, loaded with 8 live rounds of ammunition and one live round in the chamber.

46. On or about June 19, 2013, in the 300 block of Rose Street in Chester, defendants JAVAUGHN ANDERSON, ALONZO JONES and DONDRE ELLIS distributed approximately 0.96 grams of crack cocaine to CS-4 for \$100.

On or about June 20, 2013:

47. At the intersection of 9th and Kerlin Streets in Chester, defendant CHARLES STANSBURY distributed approximately 0.90 grams of crack cocaine to UC-1 for \$150.

48. In the 300 block of Rose Street in Chester, defendant SPENCER PAYNE distributed approximately 0.57 grams of crack cocaine to CS-6 for \$100.

49. In the 300 block of Rose Street in Chester, members of the Rose and Upland DTG stored a black and silver Kel-tec 9mm handgun, with an obliterated serial number, loaded with five live rounds.

50. On or about June 21, 2013, in the 300 block of Rose Street in Chester, defendants SPENCER PAYNE and DONDRE ELLIS distributed approximately 6.6 grams of crack cocaine to CS-5 for \$330.

On or about June 27, 2013:

51. In the 400 block of Bickley Place in Chester, defendant JAMEAR MCGURN distributed approximately 0.47 grams of crack cocaine to CS-4 for \$120.

52. In the 300 block of Rose Street in Chester, defendant NAIM BUTLER distributed approximately 6.3 grams of crack cocaine to CS-5 for \$330.

53. On or about July 9, 2013, in the 400 block of Rose Street in Chester, defendant JAMEAR MCGURN distributed approximately 0.14 grams of crack cocaine to a police officer acting in an undercover capacity known to the grand jury ("UC-2") for \$20.

On or about July 11, 2013:

54. In the 300 block of Rose Street in Chester, defendants WILLIAM DORSEY, ALONZO JONES and NAIM BUTLER distributed approximately 1.4 grams of crack cocaine to CS-6 for \$120.

55. In the 300 block of Rose Street in Chester, defendant ALONZO JONES distributed approximately 1.8 grams of crack cocaine to CS-4 for \$160.

56. On or about July 15, 2013, on the side of 332 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 1.3 grams of crack cocaine.

57. On or about July 17, 2013, in the 300 block of Rose Street in Chester, defendants ALONZO JONES and DONDRE ELLIS distributed approximately 1.1 grams of crack cocaine to CS-4 for \$160.

58. On or about July 18, 2013, in the rear of 334 Rose Street in Chester, defendant ALONZO JONES possessed with the intent to distribute approximately 0.55 grams of crack cocaine.

59. On or about July 19, 2013, in the 400 block of Bickley Place in Chester, defendant JAMEAR MCGURN distributed approximately 0.23 grams of crack cocaine to UC-2 for \$40.

60. On or about July 24, 2013, in the 300 block of Rose Street in Chester, defendants RONELL WHITEHEAD and WILLIAM DORSEY distributed approximately 0.62 grams of crack cocaine to CS-6 for \$120.

61. On or about July 26, 2013, in the rear of 325 Rose Street in Chester, members of the Rose and Upland DTG stored and “stashed” approximately 1.2 grams of crack cocaine and approximately 0.89 grams of cocaine.

62. On or about July 30, 2013, in the 300 block of Rose Street in Chester, defendant ALONZO JONES distributed approximately 0.76 grams of crack cocaine to CS-4 for \$150.

On or about August 6, 2013:

63. In the 300 block of 12th Street in Chester, defendant NAIM BUTLER distributed approximately 25.7 grams of crack cocaine to a state trooper acting in an undercover capacity known to the grand jury (“UC-3”) for \$1,200.

64. In the 300 block of 12th Street in Chester, defendant NAIM BUTLER brandished a firearm during the course of the narcotics transaction.

On or about August 15, 2013:

65. In the 300 block of Rose Street in Chester, defendant WILLIAM DORSEY distributed approximately 3.1 grams of crack cocaine to CS-6 for \$150.

66. In the 300 block of Rose Street in Chester, defendant ALONZO JONES distributed approximately 2.8 grams of crack cocaine to CS-4 for \$330.

On or about August 20, 2013:

67. In the 300 block of Rose Street in Chester, defendant WILLIAM DORSEY distributed approximately 6.5 grams of crack cocaine to CS-6 for \$296.

68. In the 300 block of 12th Street in Chester, defendant NAIM BUTLER distributed approximately 40.7 grams of crack cocaine to UC-3 for \$1,800.

69. On or about August 21, 2013, in the 300 block of Rose Street in Chester, defendant RONELL WHITEHEAD brandished a firearm while another male unknown to the grand jury used a firearm to shoot at other individuals unknown to the grand jury.

70. On or about September 1, 2013, in a garage between 327 and 329 Rose Street in Chester, members of the Rose and Upland DTG stored a Mossberg 12-gauge shotgun, Model 600, Serial No. H372478, and also stored empty clear ziplock baggies on the side of 329 Rose Street.

71. On or about September 3, 2013, in the 300 block of Rose Street in Chester, defendant JAVAUGHN ANDERSON possessed with the intent to distribute approximately 6.63 grams of crack cocaine.

72. On or about September 5, 2013, in the 1100 block of Madison Street in Chester, defendant WILLIAM DORSEY distributed approximately 6.7 grams of crack cocaine to CS-6 for \$300.

73. On or about September 5, 2013, in the 300 block of Rose Street in Chester, defendant ALONZO JONES distributed approximately 1.3 grams of crack cocaine to CS-4 for \$150.

74. On or about September 17, 2013, in the 300 block of Rose Street in Chester, defendant DONDRE ELLIS possessed approximately 0.03 grams of crack cocaine and \$275.

75. On or about September 18, 2013, at 301 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 13.0 grams of crack cocaine to CS-6 for \$650.

76. On or about September 23, 2013, in the 300 block of 12th Street in Chester, defendant JAMEAR MCGURN distributed approximately 1.4 grams of crack cocaine to CS-4 for \$150.

77. On or about October 25, 2013, defendants WILLIAM DORSEY and JAMEAR MCGURN used a telephone to discuss the distribution of crack cocaine.

78. On or about October 28, 2013, at 301 E. 12th Street in Chester, defendants WILLIAM DORSEY and SACHEL JOHNSON distributed approximately 12.7 grams of crack cocaine to CS-6 for \$600.

On or about November 5, 2013:

79. Defendants BRAHEEM EDWARDS and MICHAEL LEWIS entered and exited 313 E. 12th Street, a house used by the Rose and Upland DTG to store, “stash,” cook and package narcotics and store firearms.

80. In the 300 block of Rose Street in Chester, defendant WILLIAM DORSEY distributed approximately 39.3 grams of crack cocaine to CS-6 for \$1,800.

On or about November 19, 2013:

81. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. used the telephone to discuss defendant WOMACK, SR. introducing defendant DORSEY to defendant PARIS CHURCH for the purpose of defendant CHURCH serving as a source of cocaine supply for defendant DORSEY.

82. Defendant ROBERT DUSON used the telephone to warn defendant WILLIAM DORSEY of the possibility of law enforcement being informed of the location of the Rose and Upland DTG’s narcotics “stash” house at 313 E. 12th Street in Chester.

83. Defendant WILLIAM DORSEY used the telephone to warn defendants BRAHEEM EDWARDS, SATCHEL JOHNSON and JAVAUGHN ANDERSON of the possibility of law enforcement raiding the “stash” house.

84. Defendants WILLIAM DORSEY and NAIM BUTLER used the telephone to discuss defendant BUTLER selling 14 grams of crack cocaine to a drug customer.

85. In the rear of 325 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 1.7 grams of crack cocaine.

On or about November 20, 2013:

86. At 301 E. 12th Street in Chester, defendants WILLIAM DORSEY and JAVAUGHN ANDERSON distributed approximately 38.1 grams of crack cocaine to CS-6 for \$1800.

87. Defendant MICHAEL LEWIS used the telephone to warn defendant WILLIAM DORSEY of the presence of law enforcement in the Rose and Upland neighborhood.

88. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss the presence of cocaine in the “stash” house at 313 E. 12th Street in Chester.

89. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss pooling their money to purchase 125 grams of cocaine.

90. Defendants WILLIAM DORSEY, BRAHEEM EDWARDS, SATCHEL JOHNSON, and ROBERT DUSON used the telephone to discuss the presence of cookware used to cook cocaine into crack cocaine in the “stash” house at 313 E. 12th Street in Chester.

91. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss the pricing and quality of cocaine.

On or about November 21, 2013:

92. Defendants WILLIAM DORSEY, BRAHEEM EDWARDS, NAIM BUTLER, and JAVAUGHN ANDERSON entered and exited the narcotics “stash” house at 313 E. 12th Street in Chester.

93. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss defendant LEWIS trying to obtain cocaine.

94. Defendants WILLIAM DORSEY and PARIS CHURCH used the telephone to discuss defendant CHURCH supplying defendant DORSEY with cocaine.

95. At 503 Moseley Court in Chester, defendant PARIS CHURCH distributed cocaine to defendant WILLIAM DORSEY.

96. Defendants WILLIAM DORSEY and ALONZO JONES used the telephone to discuss defendant DORSEY offering to supply cocaine to defendant JONES.

97. Defendants WILLIAM DORSEY and ROBERT DUSON used the telephone to discuss defendant DUSON engaging in narcotics trafficking activity for defendant DORSEY.

98. Defendant WILLIAM DORSEY used the telephone to direct defendant JAVAUGHN ANDERSON to sell crack cocaine to a customer in the vicinity of 301 E. 12th Street in Chester.

On or about November 22, 2013:

99. Defendant WILLIAM DORSEY used the telephone to warn defendants BRAHEEM EDWARDS, SATCHEL JOHNSON, NAIM BUTLER and JAVAUGHN ANDERSON of the presence of law enforcement near the “stash” house at 313 12th Street in Chester.

100. Defendants WILLIAM DORSEY and PARIS CHURCH used the telephone to discuss the quality of cocaine defendant CHURCH had supplied to defendant DORSEY.

101. Defendant WILLIAM DORSEY used the telephone to instruct defendant BRAHEEM EDWARDS to pick up ingredients needed to cook cocaine into crack cocaine.

102. Defendant PARIS CHURCH distributed approximately 125 grams of cocaine to defendant WILLIAM DORSEY for distribution to members of the Rose and Upland DTG.

103. Defendants WILLIAM DORSEY and ALONZO JONES used the telephone to discuss defendant DORSEY supplying 14 grams of crack cocaine to defendant JONES.

104. Defendants WILLIAM DORSEY and SPENCER PAYNE used the telephone to discuss defendant PAYNE paying a drug debt owed to defendant DORSEY and discussed defendant DORSEY selling cocaine to defendant PAYNE.

105. Defendant WILLIAM DORSEY used the telephone to direct defendant JAVAUGHN ANDERSON to sell \$80 worth of crack cocaine to a drug customer at 301 E. 12th Street in Chester.

106. Defendant JAVAUGHN ANDERSON sold \$80 worth of crack cocaine to a customer at 301 E. 12th Street in Chester.

On or about November 23, 2013:

107. Defendants WILLIAM DORSEY and PARIS CHURCH used the telephone to discuss defendant CHURCH supplying cocaine to defendant DORSEY.

108. Defendant WILLIAM DORSEY used the telephone to instruct defendant ROBERT DUSON to bring him money from the “stash” location at 313 12th Street in Chester in order to purchase cocaine.

109. In the 300 block of 12th Street in Chester, defendant PARIS CHURCH distributed cocaine to defendant WILLIAM DORSEY.

110. Defendant WILLIAM DORSEY directed defendant SPENCER PAYNE to sell \$30 worth of crack cocaine to a drug customer.

111. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell crack cocaine to a drug customer.

On or about November 24, 2013:

112. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell crack cocaine to a drug customer.

113. Defendants WILLIAM DORSEY and NAIM BUTLER sold approximately 70 grams of cocaine to a drug customer for \$2,750.

114. Defendants WILLIAM DORSEY and DONDRE ELLIS used the telephone to discuss defendant ELLIS paying a drug debt to defendant DORSEY.

115. Defendant WILLIAM DORSEY distributed approximately 3.5 grams of cocaine to defendant JAMEAR MCGURN.

116. Defendant SPENCER PAYNE used the telephone to ask defendant WILLIAM DORSEY if defendant DORSEY could supply defendant PAYNE with crack cocaine for resale.

117. Defendants WILLIAM DORSEY and JAVAUGHN ANDERSON used the telephone to discuss defendant ANDERSON paying a drug debt owed to defendant DORSEY.

On or about November 26, 2013:

118. Defendants WILLIAM DORSEY, MICHAEL LEWIS, BRAHEEM EDWARDS, SATCHEL JOHNSON, and NAIM BUTLER entered and exited the narcotics “stash” house at 313 12th Street in Chester.

119. In the vicinity of East 12th and Madison Streets in Chester, defendant PARIS CHURCH distributed cocaine to defendant WILLIAM DORSEY.

On or about November 27, 2013:

120. Defendants WILLIAM DORSEY and JAVAUGHN ANDERSON used the telephone to discuss the quality of crack cocaine cooked by defendant DORSEY.

121. Defendant WILLIAM DORSEY used the telephone to offer to supply an ounce of cocaine to defendant SATCHEL JOHNSON.

122. Defendant WILLIAM DORSEY directed defendant SPENCER PAYNE to sell crack cocaine to a drug customer.

123. On or about November 28, 2013, defendants WILLIAM DORSEY and SPENCER PAYNE used the telephone to discuss defendant PAYNE selling 14 grams of cocaine to a drug customer.

On or about November 29, 2013:

124. Defendants WILLIAM DORSEY and ALONZO JONES used the telephone to arrange for defendant JONES to purchase 19 grams of cocaine from defendant DORSEY.

125. Defendant SPENCER PAYNE used the telephone to order cocaine from defendant WILLIAM DORSEY.

126. Defendant WILLIAM DORSEY used the telephone to instruct defendant ROBERT DUSON not to allow anyone to enter or exit the “stash” house at 313 12th Street in Chester, due to the presence of police in the area.

On or about November 30, 2013:

127. Defendants WILLIAM DORSEY and DONDRE ELLIS used the telephone to discuss a drug debt defendant ELLIS owed to defendant DORSEY.

128. Defendants WILLIAM DORSEY and JAVAUGHN ANDERSON used the telephone to discuss a drug debt defendant ANDERSON owed to defendant DORSEY.

129. Defendant WILLIAM DORSEY used the telephone to offer to supply cocaine to defendant JOHN DENNIS.

130. Defendant WILLIAM DORSEY used the telephone to offer a \$20 crack cocaine sale to defendant SPENCER PAYNE.

131. Defendants WILLIAM DORSEY, JAVAUGHN ANDERSON, and CLASSIE MAE DORSEY used the telephone to arrange for defendant ANDERSON to deliver \$70 worth of crack cocaine to defendant CLASSIE MAE DORSEY for resale at 301 E. 12th Street in Chester.

132. Defendant WILLIAM DORSEY used the telephone to offer a \$20 crack cocaine sale to defendant JAVAUGHN ANDERSON.

133. Defendant WILLIAM DORSEY directed defendant SPENCER PAYNE to sell \$20 worth of crack cocaine to a drug customer at 301 E. 12th Street in Chester.

134. Defendant WILLIAM DORSEY directed defendant SPENCER PAYNE to sell \$30 worth of crack cocaine to a drug customer in the area of 301 E. 12th Street in Chester.

135. Defendant SPENCER PAYNE sold \$30 worth of crack cocaine to a drug customer.

On or about December 1, 2013:

136. In the city of Chester, defendant PARIS CHURCH distributed approximately 250 grams of cocaine to defendant WILLIAM DORSEY.

137. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to distribute \$60 worth of crack cocaine to defendant CLASSIE MAE DORSEY for resale.

138. In the area 300 block of E. 12th Street in Chester, defendant JAVAUGHN ANDERSON distributed crack cocaine to defendant CLASSIE MAE DORSEY.

139. At 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 125 grams of cocaine to defendant MICHAEL LEWIS for \$4700.

140. In the 300 block of E. 12th Street in Chester, defendant WILLIAM DORSEY distributed \$30 worth of crack cocaine to defendant CLASSIE MAE DORSEY.

141. At 313 E. 12th Street in Chester, defendants WILLIAM DORSEY and DONALD WOMACK, SR. discussed defendant DORSEY supplying cocaine to defendant WOMACK, SR. for defendant RONELL WHITEHEAD.

142. In the vicinity of 12th and Madison Streets in Chester, defendant PARIS CHURCH distributed approximately 250 grams of cocaine to defendant WILLIAM DORSEY.

On or about December 2, 2013:

143. In the windowsill of 328 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” approximately 0.44 grams of crack cocaine.

144. Defendant WILLIAM DORSEY used the telephone to discuss selling 28 grams of cocaine to a drug customer.

On or about December 3, 2013:

145. In the area of 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 125 grams of cocaine to defendant DONALD WOMACK, SR. with the assistance of defendant ROBERT DUSON.

146. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss the location of a firearm in the “stash” house at 313 E. 12th Street in Chester.

147. In the area of 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 14 grams of cocaine to a drug customer for \$550.

148. At 301 E. 12th Street in Chester, defendants WILLIAM DORSEY and NAIM BUTLER distributed \$50 worth of crack cocaine to defendant CLASSIE MAE DORSEY for resale.

149. At 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 24.5 grams of cocaine to a drug customer.

150. In the area of 12th and Madison Streets in Chester, defendants NAIM BUTLER and WILLIAM DORSEY engaged in a money transaction with defendant PARIS CHURCH related to narcotics trafficking activity.

151. Defendant WILLIAM DORSEY used the telephone to discuss with defendants NAIM BUTLER, JAVAUGHN ANDERSON and BRAHEEM EDWARDS the presence of the law enforcement in the area of the “stash” location at 313 E. 12th Street and to discuss the hiding of narcotics inside the location.

On or about December 4, 2013:

152. Defendant SATCHEL JOHNSON used the telephone to warn defendant WILLIAM DORSEY of the presence of law enforcement in the area of the 300 block of Rose Street.

153. Defendant WILLIAM DORSEY used the telephone to discuss with defendants BRAHEEM EDWARDS and NAIM BUTLER the presence of the law enforcement in the Rose and Upland neighborhood.

154. Defendants WILLIAM DORSEY, RONELL WHITEHEAD, NAIM BUTLER, BRAHEEM EDWARDS, ROBERT DUSON, SATCHEL JOHNSON, and JAVAUGHN ANDERSON entered and exited the narcotics “stash” location at 313 E. 12th Street in Chester.

On or about December 5, 2013:

155. Defendants WILLIAM DORSEY and NAIM BUTLER used the telephone to discuss being targeted by law enforcement.

156. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss defendant LEWIS attempting to gather money to purchase narcotics from defendant DORSEY.

157. Defendant WILLIAM DORSEY used the telephone to warn defendant SATCHEL JOHNSON of the presence of law enforcement in the Rose and Upland neighborhood.

158. Defendant WILLIAM DORSEY arranged for defendant MICHAEL LEWIS to supply 7 grams of cocaine to defendant SPENCER PAYNE for resale to a drug customer at 313 E. 12th Street in Chester.

159. Defendant WILLIAM DORSEY arranged for defendant MICHAEL LEWIS to supply cocaine to defendant SPENCER PAYNE for resale to a drug customer at 313 E. 12th Street in Chester.

160. Defendants WILLIAM DORSEY and SPENCER PAYNE used the telephone to discuss defendant DORSEY being resupplied with cocaine so he can redistribute some of it to defendant PAYNE for resale to drug customers.

161. Defendant WILLIAM DORSEY used the telephone to arrange to distribute cocaine to defendant CLASSIE MAE DORSEY in the area of 313 E. 12th Street in Chester.

On or about December 6, 2013:

162. Defendant WILLIAM DORSEY used the telephone to offer defendant SPENCER PAYNE a quantity of cocaine.

163. Defendants WILLIAM DORSEY and ROBERT DUSON used the telephone to discuss getting a firearm out of the “stash” house at 313 E. 12th Street in Chester.

164. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss defendant SPENCER PAYNE having drug customers for defendant LEWIS.

165. Defendants WILLIAM DORSEY, SATCHEL JOHNSON and DONDRE ELLIS used the telephone to discuss defendant ELLIS obtaining cocaine from defendant NAIM BUTLER.

166. In the City of Chester, defendant PARIS CHURCH distributed approximately 100 grams of heroin to defendant WILLIAM DORSEY for resale.

167. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. used the telephone to discuss potential buyers for the heroin that defendant DORSEY obtained from defendant PARIS CHURCH.

168. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss the location of equipment used to process heroin for distribution.

On or about December 7, 2013:

169. Defendant WILLIAM DORSEY directed defendant BRAHEEM EDWARDS to sell \$30 worth of crack cocaine to a customer at 301 E. 12th Street in Chester.

170. Defendants WILLIAM DORSEY and CLASSIE MAE DORSEY discussed defendant WILLIAM DORSEY distributing \$50 worth of crack cocaine to defendant CLASSIE MAE DORSEY.

171. Defendants WILLIAM DORSEY and NAIM BUTLER discussed the location of the equipment used to process narcotics for distribution.

172. Defendant WILLIAM DORSEY directed defendant SACHEL JOHNSON to sell \$40 worth of crack cocaine to a drug customer in the area of 301 E. 12th Street in Chester.

On or about December 8, 2013:

173. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell \$70 worth of heroin to a drug customer in the 300 block of 12th Street in Chester.

174. Defendant WILLIAM DORSEY directed defendant CLASSIE MAE DORSEY to supply defendant JAVAUGHN ANDERSON with a bundle of heroin which was stored at her residence at 139 W. 22nd Street in Chester.

175. At 139 W. 22nd Street in Chester, defendant CLASSIE MAE DORSEY distributed a bundle of heroin to defendant JAVAUGHN ANDERSON for resale to a heroin customer.

176. Defendant JAVAUGHN ANDERSON distributed a bundle of heroin to a drug customer.

177. Defendant WILLIAM DORSEY obtained 10 bundles of heroin from defendant CLASSIE MAE DORSEY for resale to a drug customer.

178. Defendants WILLIAM DORSEY and SATCHEL JOHNSON used the telephone to discuss using heroin addicts to test the quality of their heroin.

179. Defendant PARIS CHURCH distributed cocaine to defendant WILILIAM DORSEY for resale.

180. In Chester, defendant WILLIAM DORSEY distributed approximately 56 grams of cocaine to defendant BRAHEEM EDWARDS.

On or about December 9, 2013:

181. In Chester, defendant WILLIAM DORSEY distributed approximately 7 grams of cocaine to defendant DONDRE ELLIS.

182. At 139 W. 22nd Street in Chester, defendant CLASSIE MAE DORSEY distributed 10 bundles of heroin to defendant WILLIAM DORSEY for resale to a drug customer.

183. In Chester, defendant WILLIAM DORSEY distributed 10 bundles of heroin to a drug customer.

184. Defendant WILLIAM DORSEY used a heroin addict known to the grand jury to test the quality of his heroin.

185. Defendant WILLIAM DORSEY obtained heroin to be sampled by the heroin addict from 139 W. 22nd Street in Chester.

186. Defendant WILLIAM DORSEY distributed heroin to defendant JAVAUGHN ANDERSON for distribution to the heroin addict to test.

187. Defendant JAVAUGHN ANDERSON distributed heroin to the heroin addict.

188. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell \$30 worth of crack cocaine to a customer at 301 E. 12th Street in Chester.

189. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss defendant DORSEY using a cutting agent to process heroin.

On or about December 10, 2013:

190. Defendant DONDRE ELLIS used the telephone to order 3.5 grams of cocaine from defendant WILLIAM DORSEY.

191. Defendant ROBERT DUSON used the telephone to tell defendant WILLIAM DORSEY that a heroin customer wanted a bundle of heroin for \$70.

192. Defendant WILLIAM DORSEY obtained the bundle of heroin from defendants CLASSIE MAE DORSEY and HERMAN PURNELL that was stored at 139 W. 22nd Street in Chester.

193. Defendant WILLIAM DORSEY distributed the bundle of heroin to the heroin customer in the area of 12th and Madison Streets in Chester.

194. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss concealing their narcotics from law enforcement inside and in the backyard of the “stash” house at 313 E. 12th Street in Chester.

195. Defendant WILLIAM DORSEY used the telephone to offer cocaine to defendant MICHAEL LEWIS.

196. Defendants WILLIAM DORSEY and SATCHEL JOHNSON used the telephone to discuss defendant JOHNSON packaging heroin for distribution at 139 W. 22nd Street in Chester.

197. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell \$30 worth of crack cocaine to customer.

198. In the vicinity of 12th and Madison Streets, defendant JAVAUGHN ANDERSON distributed \$30 worth of crack cocaine to a drug customer.

On or about December 11, 2013:

199. In the 300 block of Rose Street, defendants WILLIAM DORSEY and JAVAUGHN ANDERSON distributed \$40 worth of heroin to a customer.

200. Defendant WILLIAM DORSEY used the telephone to direct defendant ROBERT DUSON to package heroin for distribution.

201. In the area of 22nd and Edgemont Streets in Chester, defendants WILLIAM DORSEY and ROBERT DUSON distributed a bundle of heroin to a customer.

202. Defendant WILLIAM DORSEY distributed a bundle of heroin to defendant DONDRE ELLIS for resale.

203. In the front of 334 Rose Street, the rear of 330 Rose Street and the alleyway of 328 Rose Street in Chester, members of the Rose and Upland DTG “stashed” approximately 3.4 grams of crack cocaine.

On or about December 12, 2013:

204. In the area of 22nd and Edgemont Streets in Chester, defendant WILLIAM DORSEY distributed a bundle of heroin to drug customer for \$60.

205. Defendant WILLIAM DORSEY offered to pay half of the cost needed by defendant BRAHEEM EDWARDS to purchase a firearm.

206. Defendant CLASSIE MAE DORSEY used the telephone to order \$40 worth of crack cocaine from defendant WILLIAM DORSEY for resale.

207. Defendant WILLIAM DORSEY distributed 10 bundles of heroin to a customer.

208. Defendant WILLIAM DORSEY instructed defendant HERMAN PURNELL to retrieve 10 bundles of heroin from inside of 139 W. 22nd Street in Chester and distribute it to a drug customer.

209. At 139 W. 22nd Street in Chester, defendant WILLIAM DORSEY directed defendant HERMAN PURNELL to distribute heroin to a customer.

210. A drug customer used the telephone to order heroin from defendant WILLIAM DORSEY.

211. Defendant HERMAN PURNELL distributed heroin to defendant WILLIAM DORSEY that was stored at 139 W. 22nd Street in Chester.

212. In the area of Elsinore Street in Chester, defendant WILLIAM DORSEY distributed heroin to a drug customer.

213. Defendant DONDRE ELLIS used the telephone to order a bundle of heroin from defendant WILLIAM DORSEY.

214. Defendant WILLIAM DORSEY used the telephone to discuss defendant JAVAUGHN ANDERSON distributing heroin to defendant DONDRE ELLIS.

215. Defendant WILLIAM DORSEY used the telephone to reprimand defendant ROBERT DUSON for not selling narcotics in the Rose and Upland neighborhood as frequently as the other members of the Rose and Upland DTG.

216. Defendants WILLIAM DORSEY and JAVAUGHN ANDERSON used the telephone to discuss defendant ANDERSON paying defendant DORSEY a drug debt.

217. Defendants WILLIAM DORSEY, JAVAUGHN ANDERSON and ALONZO JONES used the telephone to discuss the location of equipment used to weigh narcotics.

218. Defendants WILLIAM DORSEY and BRAHEEM EDWARDS used the telephone to discuss the presence of law enforcement in the area of 313 E. 12th Street in Chester.

On or about December 13, 2013:

219. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell a bundle of heroin to a customer.

220. Defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell \$40 worth of crack cocaine to a customer in the area of 301 E. 12th Street in Chester.

221. J.L., a juvenile, ordered 3.5 grams of crack cocaine from defendant WILLIAM DORSEY and defendant DORSEY directed him to defendant SATCHEL JOHNSON.

222. J.L., a juvenile, ordered crack cocaine from defendant SATCHEL JOHNSON.

On or about December 14, 2013:

223. Defendants WILLIAM DORSEY and ROBERT DUSON used the telephone to discuss selling additional heroin to a customer for resale.

224. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss defendant LEWIS' difficulty in obtaining 125 grams of cocaine from a source of supply.

225. In the area of 313 E. 12th Street in Chester, defendants WILLIAM DORSEY and BRAHEEM EDWARDS distributed approximately 7 grams of crack cocaine to J.L, a juvenile.

226. Defendant JAVAUGHN ANDERSON ordered a bundle of heroin from defendant WILLIAM DORSEY.

227. At 139 W. 22nd Street in Chester, defendant CLASSIE MAE DORSEY distributed a bundle of heroin to defendant WILLIAM DORSEY.

228. At Madison and Rose Streets in Chester, defendant WILLIAM DORSEY distributed a bundle of heroin to defendant JAVAUGHN ANDERSON.

On or about December 15, 2013:

229. Defendants WILLIAM DORSEY and MICHAEL LEWIS used the telephone to discuss obtaining cocaine for resale.

230. Defendant WILLIAM DORSEY used the telephone to arrange to supply heroin to a customer for resale.

231. Defendant WILLIAM DORSEY directed defendant HERMAN PURNELL to distribute heroin stored at 139 W. 22nd Street in Chester, to a customer.

232. In the area of 139 W. 22nd Street in Chester, defendants CLASSIE MAE DORSEY and HERMAN PURNELL distributed heroin to a customer for defendant WILLIAM DORSEY.

233. Defendant WILLIAM DORSEY used the telephone to instruct defendant ALONZO JONES how to re-cook crack cocaine.

234. Defendant WILLIAM DORSEY agreed to obtain 7 grams of cocaine from defendant BRAHEEM EDWARDS in order to supply it to J.L., a juvenile.

On or about December 16, 2013:

235. Defendants WILLIAM DORSEY and PARIS CHURCH used the telephone to discuss defendant DORSEY paying a drug debt owed to defendant CHURCH.

236. Defendant ALONZO JONES used the telephone to inquire as to whether defendant WILLIAM DORSEY could supply him with cocaine. Defendant DORSEY responded that he did not have any cocaine at that time.

On or about December 17, 2013:

237. Defendant WILLIAM DORSEY used the telephone to instruct defendants ALONZO JONES and SATCHEL JOHNSON to bring batteries to the “stash” house at 313 E. 12th Street in Chester for the police scanner that members of the DTG used to listen for police activity.

238. In the area of 313 E. 12th Street in Chester, defendant WILLIAM DORSEY paid defendant PARIS CHURCH money owed for a drug debt.

239. In the 300 block of E.12th Street in Chester, defendant WILLIAM DORSEY directed defendant JAVAUGHN ANDERSON to sell \$70 worth of heroin to a customer.

240. On or about December 18, 2013, at 301 E. 12th Street in Chester, defendant WILLIAM DORSEY directed a drug addict to distribute approximately 38.6 grams of crack cocaine to CS-6.

On or about January 13, 2014:

241. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. used the telephone to arrange for defendant DORSEY to supply 14 grams of heroin to a customer for \$1,050.

242. In the area of 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed approximately 14 grams of heroin to a customer.

243. Defendants WILLIAM DORSEY and MICHEAL LEWIS used to the telephone to discuss not having any cocaine to sell at that time.

On or about January 14, 2014:

244. Defendant WILLIAM DORSEY used the telephone to tell defendant BRAHEEM EDWARDS that he left heroin on the table in the “stash” house at 313 E. 12th Street in Chester.

245. Defendants WILLIAM DORSEY and DONALD WOMACK, SR. discussed defendant WOMACK, SR. paying a \$1,000 drug debt back to defendant DORSEY so defendant DORSEY could purchase cocaine.

246. Defendant CLASSIE MAE DORSEY used the telephone to order crack cocaine from defendant WILLIAM DORSEY and defendant WILLIAM DORSEY instructed her to go to Rose Street in Chester to make the purchase of crack cocaine.

On or about January 15, 2014:

247. Defendant WILLIAM DORSEY used the telephone to warn defendant RONELL WHITEHEAD of the presence of law enforcement in the Rose and Upland neighborhood.

248. Defendant BRAHEEM EDWARDS used the telephone to warn defendant WILLIAM DORSEY of the presence of law enforcement in the vicinity of the “stash” house at 313 E. 12th Street in Chester.

249. Defendant WILLIAM DORSEY directed defendant ROBERT DUSON to distribute \$30 worth of crack cocaine to defendant CLASSIE MAE DORSEY for resale.

250. On or about January 16, 2014, in the area of 313 E. 12th Street in Chester, defendant WILLIAM DORSEY distributed cocaine to a customer.

251. On or about January 17, 2014, defendant WILLIAM DORSEY and J.L., a juvenile, discussed the presence of law enforcement in the area of the 300 block of Rose Street in Chester.

On or about April 1, 2014:

252. In the area of the 300 block of Rose Street in Chester, defendant WILLIAM DORSEY supplied J.L., a juvenile, with a Bryco Arms 9mm semi-automatic firearm, Model

Jennings Nine, Serial No. 1361990, loaded with 12 live rounds of ammunition in the magazine and 1 live round of ammunition in the chamber.

253. In the rear of 318 Rose Street in Chester, members of the Rose and Upland DTG stored and “stashed” approximately 1.7 grams of crack cocaine.

254. On or about May 5, 2014, in the 300 block of Rose Street in Chester, defendant JOHN DENNIS and B.S., an individual known to the grand jury, distributed approximately 0.58 grams of crack cocaine to CS-4 for \$150.

255. On or about May 12, 2014, in the 1100 block of Upland Street in Chester, defendant JOHN DENNIS distributed approximately 1.4 grams of crack cocaine to CS-4 for \$160.

256. On or about May 21, 2014, in the rear yard of the 331 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” crack cocaine.

257. On or about June 24, 2014, in the area of the 300 block of Rose Street in Chester, defendant JOHN DENNIS possessed cocaine, numerous new and unused yellow baggies marked with Apples, and \$257.

258. On or about July 2, 2014, in the area of 20th and Edgemont Streets in Chester, defendant BRAHEEM EDWARDS possessed a black Glock 30, .45 caliber handgun, Serial No. GUV502, loaded with 9 live rounds of ammunition in the magazine and one live round of ammunition in the chamber.

259. On or about July 17, 2014, in the mailbox for 331 Rose Street in Chester, members of the Rose and Upland DTG stored or “stashed” cocaine.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 2012, in Chester, in the Eastern District of
Pennsylvania, defendant

**DONDRE ELLIS,
a/k/a "Little Don,"
a/k/a "Dre,"
a/k/a "Billy,"**

knowingly and intentionally distributed approximately 0.46 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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 2012, in Chester, in the Eastern District of Pennsylvania, defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed approximately 0.46 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 16, 2012, in Chester, in the Eastern District of Pennsylvania, defendants

**ERVEN TOWERS-ROLON,
a/k/a "Erv," and
KAREEM YORK,
a/k/a "Pedie,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.85 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), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 16, 2012, in Chester, in the Eastern District of Pennsylvania, defendants

**ERVEN TOWERS-ROLON,
a/k/a “Erv,” and
KAREEM YORK,
a/k/a “Pedie,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.85 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 31, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.26 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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 31, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.26 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 the Sun Village Park, a public playground located at Johnson and Curry Streets, 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 February 5, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.22 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 NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.22 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 the Sun Village Park, a playground located at Johnson and Curry Streets, 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 February 7, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.41 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 ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.41 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 the Sun Village Park, a playground located at Johnson and Curry Streets, 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 TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 0.47 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 THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 0.47 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.14 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 FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.14 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 the Sun Village Park, a public playground located at Johnson and Curry Streets, 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 SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a “Erv,”
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”and
WAALI SHEPHERD,
a/k/a “Bub,”**

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

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a “Erv,”
JAVAUGHN ANDERSON,
a/k/a “Vaughny,” and
WAALI SHEPHERD,
a/k/a “Bub,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.67 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a “Erv,”**

knowingly and intentionally distributed approximately 1.5 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 NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a “Erv,”**

knowingly and intentionally distributed approximately 1.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 0.42 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.23 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 TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a “Bre,”**

knowingly and intentionally distributed approximately 0.42 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and approximately 0.23 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 Sun Village Park, a public park located at Johnson and Curry Streets, 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 TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a "Erv,"**

knowingly and intentionally distributed approximately 0.68 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.16 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 TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**ERVEN TOWERS-ROLON,
a/k/a "Erv,"**

knowingly and intentionally distributed approximately 0.68 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.16 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 TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 3.2 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.38 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 TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 3.2 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.38 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 TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 0.74 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 TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 0.74 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.21 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 TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.18 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), and Title 18, United States Code, Section 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.18 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, in Chester, 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 THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY,

a person at least eighteen years of age, knowingly and intentionally employed, hired, used,
persuaded, induced, and enticed J.S., a person under eighteen years of age, to distribute, and aid
and abet the distribution of, a mixture or 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).

In violation of Title 21, United States Code, Section 861(a)(1).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 3.3 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.54 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 THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 3.3 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.54 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 THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2013, in Eddystone, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.79 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 THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.99 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 THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.99 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 9.6 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.37 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 THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 9.6 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately 0.37 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 THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally distributed approximately 13.9 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and approximately 0.32 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 FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Broddie,"**

knowingly and intentionally distributed approximately 13.9 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and approximately 0.32 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 FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly possessed a firearm, that is:

- (1) a Forehand Revolver, Model 1901, serial number D431, loaded with 6 live rounds of ammunition; and
- (2) a H&R Inc., Blue Steeled Revolver, Model 732, loaded with 5 live rounds of ammunition, and an obliterated serial number,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute cocaine base ("crack"), in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

having been convicted in a court of the Commonwealth of Pennsylvania 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 Forehand revolver, Model 1901, serial number D431, loaded with 6 live rounds of ammunition; and a H&R Inc., Blue Steeled Revolver, Model 732, with an obliterated serial number, and loaded with 5 live rounds of ammunition.

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

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BREON BURTON,
a/k/a "Bre,"**

knowingly and intentionally possessed with intent to distribute approximately 0.78 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 FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

**JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

knowingly and intentionally distributed approximately 6.5 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 FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

knowingly and intentionally distributed approximately 6.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.1 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), and Title 18, United States Code, Section 2.

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.1 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 0.75 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 FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed a mixture and substance containing approximately 0.75 grams of a detectable amount of cocaine base (“crack”), 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 FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a "Nai," and
RONELL WHITEHEAD,
a/k/a "R,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.2 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), and Title 18, United States Code, Section 2.

COUNT FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a "Nai," and
RONELL WHITEHEAD,
a/k/a "R,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.2 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed approximately 1.5 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 FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed approximately 1.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.5 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 FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.14 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 FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.14 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 FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed approximately 2.6 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 FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed approximately 2.6 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 1.2 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 SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 1.2 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SIXTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**RONELL WHITEHEAD,
a/k/a "R," and
SPENCER PAYNE,
a/k/a "Boodine,"
a/k/a "Nur,"**

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

COUNT SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013 in Chester, in the Eastern District of Pennsylvania,
defendants

**RONELL WHITEHEAD,
a/k/a "R," and
SPENCER PAYNE,
a/k/a "Boodine,"
a/k/a "Nur,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.1 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a "Nai,"**

knowingly and intentionally distributed approximately 3.1 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 SIXTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a "Nai,"**

knowingly and intentionally distributed approximately 3.1 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 SIXTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**JAVAUGHN ANDERSON,
a/k/a “Vaughny,”
ALONZO JONES,
a/k/a Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.96 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), and Title 18, United States Code, Section 2.

COUNT SIXTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**JAVAUGHN ANDERSON,
a/k/a “Vaughny,”
ALONZO JONES,
a/k/a Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.96 grams of mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SIXTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.90 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 SIXTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

CHARLES STANSBURY

knowingly and intentionally distributed approximately 0.90 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Chester-Upland School of the Arts, a public elementary school, located at 501 W. 9th Street, 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 SEVENTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed approximately 0.57 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 SEVENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed approximately 0.57 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SEVENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 6.6 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), and Title 18, United States Code, Section 2.

COUNT SEVENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 6.6 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SEVENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed approximately 0.47 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 SEVENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed a mixture and substance containing approximately 0.47 grams of a detectable amount of cocaine base (“crack”), 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 SEVENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 6.3 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 SEVENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 6.3 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 SEVENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed approximately 0.14 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 SEVENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed approximately 0.14 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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).

COUNT EIGHTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”
ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
NAIM BUTLER,
a/k/a “Nai,”**

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

COUNT EIGHTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”
ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 EIGHTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.8 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 EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.8 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 EIGHTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 17, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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

COUNT EIGHTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 17, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,” and
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.1 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 EIGHTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally possessed with intent to distribute approximately 0.55 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 EIGHTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally possessed with intent to distribute approximately 0.55 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 EIGHTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed approximately 0.23 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 EIGHTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMEAR MCGURN,
a/k/a “Biggie,”**

knowingly and intentionally distributed approximately 0.23 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 NINETY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**RONELL WHITEHEAD,
a/k/a “R,” and
WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.62 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), and Title 18, United States Code, Section 2.

COUNT NINETY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**RONELL WHITEHEAD,
a/k/a “R,” and
WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.62 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 NINETY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 0.76 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 NINETY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 0.76 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 NINETY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 25.7 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 NINETY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed approximately 25.7 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 NINETY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**NAIM BUTLER,
a/k/a "Nai,"**

knowingly possessed a firearm, that is, a black and gray handgun capable of firing 16 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, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute cocaine base ("crack"), in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT NINETY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2013, in Chester, in the Eastern District of Pennsylvania, the
defendant

**NAIM BUTLER,
a/k/a "Nai,"**

having been convicted in a court of the Commonwealth of Pennsylvania 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 black and gray handgun capable of firing 16 live rounds of ammunition.

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

COUNT NINETY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 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 3.1 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 NINETY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 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 3.1 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 2.8 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 ONE HUNDRED AND ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 2.8 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 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 6.5 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 ONE HUNDRED AND THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 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 6.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 40.7 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)(B).

COUNT ONE HUNDRED AND FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 40.7 grams of, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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)(B).

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

COUNT ONE HUNDRED AND SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 5, 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 6.7 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 ONE HUNDRED AND SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 5, 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 6.7 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.3 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 ONE HUNDRED AND NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally distributed approximately 1.3 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 18, 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 13.0 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 ONE HUNDRED AND ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 18, 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 13.0 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 ONE HUNDRED AND TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**JAMEAR MCGURN,
a/k/a "Biggie,"**

knowingly and intentionally distributed approximately 1.4 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 ONE HUNDRED AND THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**JAMEAR MCGURN,
a/k/a "Biggie,"**

knowingly and intentionally distributed approximately 1.4 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 ONE HUNDRED AND FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a/ "Will,"
a/k/a "Sabor," and
SATCHEL JOHNSON,
a/k/a "Satch,"
a/k/a "S,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 12.7 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SATCHEL JOHNSON,
a/k/a “Satch,”
a/k/a “S,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 12.7 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 39.3 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)(B).

COUNT ONE HUNDRED AND SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 39.3 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 20, 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, 28 grams or more, that is, approximately 38.1 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)(B), and Title 18 United States Code, Section 2.

COUNT ONE HUNDRED AND NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 20, 2013, in Chester, Pennsylvania, 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, 28 grams or more, that is, approximately 38.1 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

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

COUNT ONE HUNDRED AND TWENTY

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
ROBERT DUSON,
a/k/a “Rob,”**

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 defendants DORSEY and DUSON used a telephone to discuss defendant DUSON being available to assist defendant DORSEY in processing and packaging cocaine for distribution when defendant DORSEY obtained more cocaine from a supplier.

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

COUNT ONE HUNDRED AND TWENTY-ONE

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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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

COUNT ONE HUNDRED AND TWENTY-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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, 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 ONE HUNDRED AND TWENTY-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 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 a telephone to discuss the quality of cocaine for resale that had been supplied to defendant DORSEY by a person known to the grand jury.

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

COUNT ONE HUNDRED AND TWENTY-FOUR

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 used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used a telephone to instruct a person known to the grand jury to pick up ingredients necessary for cooking cocaine into cocaine base (“crack”).

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

COUNT ONE HUNDRED AND TWENTY-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
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

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 defendants DORSEY and PAYNE used the telephone to discuss PAYNE paying a drug debt owed to defendant DORSEY and to discuss defendant DORSEY selling defendant PAYNE cocaine for resale.

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

COUNT ONE HUNDRED AND TWENTY-SIX

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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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

COUNT ONE HUNDRED AND TWENTY-SEVEN

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
JAVAUGHN ANDERSON
a/k/a “Vaughny,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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 Street, 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 ONE HUNDRED AND TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed 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 ONE HUNDRED AND TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed 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, 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 ONE HUNDRED AND THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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, Sections 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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 the 1 University Place, Chester, 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 ONE HUNDRED AND THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 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, 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 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, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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, 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 ONE HUNDRED AND THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 3.5 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 3.5 grams of, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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, 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 ONE HUNDRED AND THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 70 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 ONE HUNDRED AND THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 70 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, 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 ONE HUNDRED AND THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2013, in Chester, in the Eastern District of
Pennsylvania, defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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), (b)(1)(C), in that defendant ELLIS used the telephone to arrange to pay a drug debt owed to co-defendant WILLIAM DORSEY, for cocaine he had previously purchased for resale.

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

COUNT ONE HUNDRED AND THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 3.5 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 ONE HUNDRED AND FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 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 3.5 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 ONE HUNDRED FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession with intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant PAYNE used the telephone to arrange to purchase cocaine base (“crack”) for resale.

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

COUNT ONE HUNDRED FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed 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 ONE HUNDRED AND FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a “Pay May,”
a/k/a “Pay,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND FORTY-FOUR

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
SATCHEL JOHNSON,
a/k/a “Satch,”
a/k/a “S,”**

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 arrange to distribute 28 grams of cocaine to defendant JOHNSON, for resale.

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

COUNT ONE HUNDRED AND FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**ALONZO JONES,
a/k/a “Cuddie,”
a/k/a “Cuddy,”
a/k/a “Jizzle,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant JONES used the telephone to arrange to purchase cocaine for resale.

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

COUNT ONE HUNDRED AND FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

**ROBERT DUSON,
a/k/a “Rob,”**

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 DUSON used the telephone to discuss protecting the narcotics “stash” house at 313 E. 12th Street from police detection.

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

COUNT ONE HUNDRED AND FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of
Pennsylvania, defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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 ELLIS used the telephone to discuss paying money he owed for cocaine that he had previously obtained for resale.

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

COUNT ONE HUNDRED AND FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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), (b)(1)(C), in that defendant ANDERSON used the telephone to discuss paying money he owed for cocaine he had previously obtained for resale.

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

COUNT ONE HUNDRED AND FOURTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of Pennsylvania, defendant

**JOHN DENNIS,
a/k/a “Zelly,”**

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), (b)(1)(C), in that defendant DENNIS used the telephone to discuss purchasing cocaine for defendant DENNIS to resell.

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

COUNT ONE HUNDRED AND FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 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, 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 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, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of
Pennsylvania, defendant

CLASSIE MAE DORSEY

knowingly and intentionally possessed with the intent to distribute 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 ONE HUNDRED FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

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

COUNT ONE HUNDRED AND FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2013, in Chester, in the Eastern District of Pennsylvania, defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Widener University, a private university, located at 1 University Place, 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 ONE HUNDRED AND FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed approximately 250 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 ONE HUNDRED AND FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 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, 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 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, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

CLASSIE MAE DORSEY

knowingly and intentionally possessed with intent to distribute 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 ONE HUNDRED AND FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 1, 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 125 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 ONE HUNDRED AND SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

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

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

knowingly and intentionally distributed 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 ONE HUNDRED AND SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 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 ONE HUNDRED AND SIXTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**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, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant WOMACK, SR. used the telephone to order 125 grams of cocaine for defendant WOMACK, SR. to resell.

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

COUNT ONE HUNDRED AND SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed approximately 250 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 ONE HUNDRED AND SIXTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed 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 ONE HUNDRED AND SIXTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

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

knowingly and intentionally possessed with the intent to distribute 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 ONE HUNDRED AND SIXTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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 arrange to distribute 28 grams of cocaine to an individual known to the grand jury.

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

COUNT ONE HUNDRED AND SIXTY-EIGHT

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,” and
ROBERT DUSON,
a/k/a “Rob,”**

knowingly and intentionally distributed, and aided and abetted in the distribution of,
approximately 125 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 ONE HUNDRED AND SIXTY-NINE

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,” and
ROBERT DUSON,
a/k/a “Rob,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 125 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 ONE HUNDRED AND SEVENTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**DONALD WOMACK, SR.,
a/k/a "Kas,"
a/k/a "Kasul,"
a/k/a "D-Rock,"**

knowingly and intentionally possessed with the intent to distribute approximately 125 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 ONE HUNDRED AND SEVENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 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 14 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 ONE HUNDRED AND SEVENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 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 14 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 ONE HUNDRED AND SEVENTY-THREE

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,” and
NAIM BUTLER,
a/k/a “Nai,”**

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

COUNT ONE HUNDRED AND SEVENTY-FOUR

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,” and
NAIM BUTLER,
a/k/a “Nai,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND SEVENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

CLASSIE MAE DORSEY

knowingly and intentionally possessed with the intent to distribute 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 ONE HUNDRED AND SEVENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 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 24.5 grams 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 ONE HUNDRED AND SEVENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 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 24.5 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 ONE HUNDRED AND SEVENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 5, 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 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 defendants DORSEY and BUTLER used a telephone to discuss being targeted by law enforcement for their drug trafficking activity.

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

COUNT ONE HUNDRED AND SEVENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**MICHAEL LEWIS
a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”**

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 LEWIS used a telephone to discuss distributing cocaine.

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

COUNT ONE HUNDRED AND EIGHTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**MICHAEL LEWIS
a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”**

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 LEWIS used a telephone to attempt to order cocaine for defendant LEWIS to distribute.

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

COUNT ONE HUNDRED AND EIGHTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
MICHAEL LEWIS,
a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
7.0 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 ONE HUNDRED AND EIGHTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
MICHAEL LEWIS,
a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 7.0 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 ONE HUNDRED AND EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

knowingly and intentionally possessed with intent to distribute approximately 7.0 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 ONE HUNDRED AND EIGHTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

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 PAYNE used a telephone to discuss obtaining cocaine for defendant PAYNE to distribute.

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

COUNT ONE HUNDRED AND EIGHTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

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 a telephone to offer cocaine to defendant PAYNE for defendant PAYNE to distribute.

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

COUNT ONE HUNDRED AND EIGHTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 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), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND EIGHTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND EIGHTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

**SPENCER PAYNE,
a/k/a “Boodine,”
a/k/a “Nur,”**

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 PAYNE used a telephone to order cocaine for defendant PAYNE to distribute.

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

COUNT ONE HUNDRED AND EIGHTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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 ELLIS used a telephone to order cocaine for defendant ELLIS to distribute.

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

COUNT ONE HUNDRED AND NINETY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"**

knowingly and intentionally distributed approximately 100 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 ONE HUNDRED AND NINETY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**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 heroin, in violation of Title 21, United States Code, Section 841(a)(1), in that defendant WOMACK, SR. used a telephone to discuss potential buyers of heroin.

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

COUNT ONE HUNDRED AND NINETY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

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 EDWARDS used a telephone to discuss the location of equipment used to process heroin for distribution.

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

COUNT ONE HUNDRED AND NINETY-THREE

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
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

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

COUNT ONE HUNDRED AND NINETY-FOUR

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
BRAHEEM EDWARDS
a/k/a “Broddie,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 ONE HUNDRED AND NINETY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

CLASSIE MAE DORSEY

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1) in that defendant DORSEY used the telephone to order cocaine base (“crack”) for defendant DORSEY to distribute.

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

COUNT ONE HUNDRED AND NINETY-SIX

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
SATCHEL JOHNSON,
a/k/a “Satch,”
a/k/a “S,”**

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

COUNT ONE HUNDRED AND NINETY-SEVEN

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 "Sabor,"
a/k/a "Will," and
SATCHEL JOHNSON,
a/k/a "Satch,"
a/k/a "S,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base ("crack"), 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 ONE HUNDRED AND NINETY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 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, 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), and Title
18, United States Code, Section 2.

COUNT ONE HUNDRED AND NINETY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 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, 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), and Title 18, United States Code, Section 2.

COUNT TWO HUNDRED

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CLASSIE MAE DORSEY

knowingly and intentionally distributed 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 HUNDRED AND ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used a telephone to obtain heroin for defendant DORSEY to distribute.

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

COUNT TWO HUNDRED AND TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
a/k/a “Pay May,”
a/k/a “Pay,” and
WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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

COUNT TWO HUNDRED AND THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**PARIS CHURCH,
a/k/a “Pay May,”
a/k/a “Pay,” and
WILLIAM DORSEY
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 56 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 TWO HUNDRED AND FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRAHEEM EDWARDS,
a/k/a “Broddie,”**

knowingly and intentionally possessed with 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 TWO HUNDRED AND FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 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 7 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 TWO HUNDRED AND SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

knowingly and intentionally possessed with intent to distribute approximately 7 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 TWO HUNDRED AND SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CLASSIE MAE DORSEY

knowingly and intentionally distributed 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 HUNDRED AND EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 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 HUNDRED AND NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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 defendant DORSEY used a telephone to arrange for a heroin addict to test the quality of heroin that defendant DORSEY intended to distribute.

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

COUNT TWO HUNDRED AND TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 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, 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), and Title 18, United States Code, Section 2.

COUNT TWO HUNDRED AND ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 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, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

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 EDWARDS used a telephone to discuss using a cutting agent to process heroin for distribution.

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

COUNT TWO HUNDRED AND THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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 ELLIS used a telephone to order 3.5 grams of cocaine for defendant ELLIS to distribute.

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

COUNT TWO HUNDRED AND FOURTEEN

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 "Sabor,"
a/k/a "Will,"
ROBERT DUSON,
a/k/a "Rob," and
CLASSIE MAE DORSEY**

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

COUNT TWO HUNDRED AND FIFTEEN

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 “Sabor,”
a/k/a “Will,”
ROBERT DUSON,
a/k/a “Rob,” and
CLASSIE MAE DORSEY**

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

COUNT TWO HUNDRED AND SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

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 defendants DORSEY and EDWARDS used a telephone to discuss concealing their narcotics from detection from law enforcement.

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

COUNT TWO HUNDRED AND SEVENTEEN

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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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

COUNT TWO HUNDRED AND EIGHTEEN

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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND 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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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

COUNT TWO HUNDRED AND TWENTY

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
JAVAUGHN ANDERSON,
a/k/a “Vaughny,”**

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

COUNT TWO HUNDRED AND TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
ROBERT DUSON,
a/k/a “Rob,”**

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

COUNT TWO HUNDRED AND TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Sabor,”
a/k/a “Will,”**

knowingly and intentionally distributed 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 HUNDRED AND TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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 HUNDRED AND TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed 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 HUNDRED AND TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

CLASSIE MAE DORSEY

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used a telephone to order cocaine base (“crack”) for defendant DORSEY to distribute.

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

COUNT TWO HUNDRED AND TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
CLASSIE MAE DORSEY, and
HERMAN PURNELL**

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

COUNT TWO HUNDRED AND TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”**

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 defendant ELLIS used a telephone to order heroin for defendant ELLIS to distribute.

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

COUNT TWO HUNDRED AND TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
ROBERT DUSON,
a/k/a “Rob,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used a telephone to reprimand defendant DUSON for not making enough sales of cocaine base (“crack”).

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

COUNT TWO HUNDRED AND TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 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, 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), and Title
18, United States Code, Section 2.

COUNT TWO HUNDRED AND THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 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, 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), and Title 18, United States Code, Section 2.

COUNT TWO HUNDRED AND THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 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, a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**SACHEL JOHNSON,
a/k/a “Satch,”
a/k/a “S,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant JOHNSON used a telephone to arrange to distribute cocaine base (“crack”) to a juvenile for the juvenile to distribute.

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

COUNT TWO HUNDRED AND THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**ROBERT DUSON,
a/k/a “Rob,”**

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 defendant DUSON used a telephone to discuss distributing heroin.

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

COUNT TWO HUNDRED AND THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

**MICHAEL LEWIS,
a/k/a “Maybach,”
a/k/a “Miz,”
a/k/a “Mitite,”**

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 LEWIS used a telephone to discuss having difficulty obtaining 125 grams of cocaine for defendant LEWIS to distribute.

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

COUNT TWO HUNDRED AND THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,” and
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 7
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), and Title
18, United States Code, Section 2.

COUNT TWO HUNDRED AND THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Sabor,”
a/k/a “Will,” and
BRAHEEM EDWARDS,
a/k/a “Broddie,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 7 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor," and
CLASSIE MAE DORSEY**

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

COUNT TWO HUNDRED AND THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a “Sabor,”
a/k/a “Will,” and
CLASSIE MAE DORSEY**

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

COUNT TWO HUNDRED AND THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**JAVAUGHN ANDERSON,
a/k/a "Vaughny,"**

knowingly and intentionally possessed with the 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 HUNDRED AND FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor," and
HERMAN PURNELL**

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

COUNT TWO HUNDRED AND FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 16, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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 a telephone to discuss paying a debt for narcotics he had previously purchased.

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

COUNT TWO HUNDRED AND FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 17, 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, 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), and Title
18, United States Code, Section 2.

COUNT TWO HUNDRED AND FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 17, 2013, in Chester, in the Eastern District of Pennsylvania,
defendants

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

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

COUNT TWO HUNDRED AND FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

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

knowingly and intentionally distributed 28 grams or more, that is, approximately 38.6 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)(B).

COUNT TWO HUNDRED AND FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 28 grams or more, that is, approximately 38.6 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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)(B).

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

COUNT TWO HUNDRED AND FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

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

knowingly and intentionally distributed approximately 14 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 TWO HUNDRED AND FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2013, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 14 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 TWO HUNDRED AND FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 14, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

CLASSIE MAE DORSEY

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating a drug felony, namely, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), in that defendant DORSEY used a telephone to order cocaine base (“crack”) for defendant DORSEY to distribute.

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

COUNT TWO HUNDRED AND FOURTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 15, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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 a telephone to warn members of the Rose and Upland Drug Trafficking Group of the presence of law enforcement in their area.

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

COUNT TWO HUNDRED AND FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

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

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

knowingly and intentionally distributed 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 TWO HUNDRED AND FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

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 a telephone to discuss the presence of law enforcement in the area of the intersection of Rose and Upland Streets.

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

COUNT TWO HUNDRED AND FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”**

having been convicted in a court of the Commonwealth of Pennsylvania 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 Bryco Arms 9mm Luger, Model Jennings, with serial number 1361990, loaded with 12 live rounds of ammunition in the magazine, and one live round of ammunition in the chamber.

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

COUNT TWO HUNDRED AND FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**JOHN DENNIS,
a/k/a “Zelly,”**

knowingly and intentionally distributed approximately 0.58 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 HUNDRED AND FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**JOHN DENNIS,
a/k/a “Zelly,”**

knowingly and intentionally distributed approximately 0.58 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**JOHN DENNIS,
a/k/a “Zelly,”**

knowingly and intentionally distributed approximately 1.4 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 HUNDRED AND FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**JOHN DENNIS,
a/k/a “Zelly,”**

knowingly and intentionally distributed approximately 1.4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), 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 TWO HUNDRED AND FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 24, 2014, in Chester, in the Eastern District of Pennsylvania,
defendant

**JOHN DENNIS
a/k/a “Zelly,”**

knowingly and intentionally possessed with the intent to distribute 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 TWO HUNDRED AND FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2014, in Chester, in the Eastern District of Pennsylvania, the
defendant

**BRAHEEM EDWARDS,
a/k/a "Broddie,"**

having been convicted in a court of the Commonwealth of Pennsylvania 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 black, Glock 30, .45 caliber handgun, with serial number GUV502, loaded with 9 live rounds of ammunition in the magazine and one live round of ammunition in the chamber.

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

COUNT TWO HUNDRED AND FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about December 2013, to on or about April 14, 2014, in Chester, in the Eastern District of Pennsylvania, defendants

**CLASSIE MAE DORSEY and
HERMAN PURNELL**

knowingly and intentionally made available for use, and aided and abetted the making available for use of, their residence located at 139 W. 22nd Street in Chester, for the purpose of unlawfully storing, manufacturing, distributing, and using a controlled substance, that is, heroin, Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

COUNT TWO HUNDRED AND SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

1. From on or about March 11, 2014, through on or about March 12, 2014, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”
DONALD WOMACK, SR.,
a/k/a “Kas,”
a/k/a “Kasul,”
a/k/a “D-Rock,” and
PARIS CHURCH,
a/k/a “Pay May,”
a/k/a “Pay,”**

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute approximately 65 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants WILLIAM DORSEY, DONALD WOMACK, SR. and PARIS CHURCH agreed to order a large quantity of marijuana for them to distribute.

3. Defendants WILLIAM DORSEY, DONALD WOMACK, SR. and PARIS CHURCH exchanged telephone calls and text messages to conduct the purchase and arrangement for the marijuana to be shipped from Texas to Chester, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants WILLIAM DORSEY, DONALD WOMACK, SR. and PARIS CHURCH committed the

following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about March 11, 2014:

1. Defendant WILLIAM DORSEY used the telephone to tell defendant PARIS CHURCH to call him.
2. Defendant DONALD WOMACK, SR. used the telephone to ask defendant PARIS CHURCH how to change a delivery address with Federal Express (“FedEx”).
3. Defendant DONALD WOMACK, SR. used the telephone to inform defendant PARIS CHURCH that defendants WOMACK, SR. and WILLIAM DORSEY learned that the marijuana they had ordered was in Texas.
4. Defendants WILLIAM DORSEY and PARIS CHURCH used the telephone to discuss the effect of changing the delivery address of the shipment of marijuana.
5. Defendant PARIS CHURCH informed defendant WILLIAM DORSEY that at that point only the shipper of the marijuana could change the delivery address on the FedEx parcel.
6. Defendants DONALD WOMACK, SR. and PARIS CHURCH used the telephone to discuss whether defendant WILLIAM DORSEY knew the name of the shipper of the marijuana in order to change the delivery address for the marijuana.
7. Defendants DONALD WOMACK, SR. and PARIS CHURCH used the telephone to discuss the city in Texas from which they had received a previous shipment of marijuana.
8. Defendant DONALD WOMACK, SR. instructed defendant PARIS CHURCH to call defendant WILLIAM DORSEY to find out the name of the business from which a previous shipment of marijuana had been sent to them.
9. Defendants DONALD WOMACK, SR. and PARIS CHURCH used the

telephone to discuss the next steps in obtaining the marijuana shipment if they were not able to change the delivery address.

On or about March 12, 2014:

10. Defendant PARIS CHURCH used the telephone to inform defendant WILLIAM DORSEY that he believed that the package had arrived in the city of Chester.

11. Defendant DONALD WOMACK, SR. informed defendant PARIS CHURCH that he was going to instruct defendant WILLIAM DORSEY to find the shipment of marijuana.

12. Defendant WILLIAM DORSEY informed defendant PARIS CHURCH that he learned that the shipment of marijuana was being held at the FedEx Distribution Center in Philadelphia.

13. Defendant WILLIAM DORSEY told defendant PARIS CHURCH that defendant DORSEY would find out what needed to be done to pick up the package from the FedEx Distribution Center.

14. Defendant WILLIAM DORSEY used the telephone to inform defendant PARIS CHURCH that the marijuana had been intercepted by police.

15. Defendants WILLIAM DORSEY and PARIS CHURCH discussed whether law enforcement would be able to learn their identities as the individuals who had been checking on the shipment of marijuana.

16. Defendants WILLIAM DORSEY and PARIS CHURCH discussed how they needed money and were financially affected by not getting the marijuana to distribute.

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

COUNT TWO HUNDRED AND SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2014, in Chester, in the Eastern District of Pennsylvania,
defendants

**WILLIAM DORSEY,
a/k/a “Will,”
a/k/a “Sabor,”
DONALD WOMACK, SR.,
a/k/a “Kas,”
a/k/a “Kasul,”
a/k/a “D-Rock,” and
PARIS CHURCH,
a/k/a “Pay May,”
a/k/a “Pay,”**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, approximately 65 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a) and 843(b), set forth in this indictment, defendants

WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
DONALD WOMACK, SR.,
a/k/a "Kas,"
a/k/a "Kasul,"
a/k/a "D-Rock,"
PARIS CHURCH,
a/k/a "Pay May,"
a/k/a "Pay,"
BRAHEEM EDWARDS,
a/k/a "Broddie,"
NAIM BUTLER,
a/k/a "Nai,"
RONELL WHITEHEAD,
a/k/a "R,"
MICHAEL LEWIS,
a/k/a "Maybach,"
a/k/a "Miz,"
a/k/a "Mitite,"
BREON BURTON,
a/k/a "Bre,"
JAVAUGHN ANDERSON,
a/k/a "Vaughny,"
ROBERT DUSON,
a/k/a "Rob,"
SPENCER PAYNE,
a/k/a "Boodine,"
a/k/a "Nur,"
SATCHEL JOHNSON,
a/k/a "Satch,"
a/k/a "S,"
ALONZO JONES,
a/k/a "Cuddie,"
a/k/a "Cuddy,"
a/k/a "Jizzle,"
JAMEAR MCGURN,
a/k/a "Biggie,"
CLASSIE MAE DORSEY,

**HERMAN PURNELL,
DONDRE ELLIS,
a/k/a “Little Don,”
a/k/a “Dre,”
a/k/a “Billy,”
ERVEN TOWERS-ROLON,
a/k/a “Erv,”
JOHN DENNIS,
a/k/a “Zelly,”
CHARLES STANSBURY,
WAALI SHEPHERD,
a/k/a “Bub,” and
KAREEM YORK,
a/k/a “Pedie,”**

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, including the following:

1. Remington Wingmaster, 12-gauge shotgun, Model 870, Serial No. T301158V;
2. Hi-Point 9mm Luger semi-automatic pistol, Model C-9, Serial No. 1649502;
3. AMT .380 caliber semiautomatic pistol, Model Back Up, with an obliterated serial number;
4. Grey plastic Ruger firearms case containing one silver metal Ruger magazine assembly with a capacity of 15 and 15 9mm Federal Luger cartridges;
5. One silver metal magazine assembly capacity 9mm Luger cartridges;
6. One black metal Astra magazine assembly capacity 15 9mm Luger cartridges;
7. One factory box containing 16 S&B 9mm Luger cartridges;
8. One factory box containing 39 Russian Makarov 9mm cartridges;
9. 13 Winchester, 4 Federal, and 2 PMC .380 caliber cartridges;

10. Black Taurus .40 caliber handgun, Serial No. SYI35556, and 10 live rounds of ammunition;
11. Intratec Tec-9 handgun, Serial No. 46323, and 19 live rounds of ammunition;
12. Black Pietro Beretta 9mm handgun, Serial No. D331782, and 10 live rounds of ammunition;
13. Glock .40 caliber handgun, Serial No. KNZ-783;
14. Glock magazine and 12 live rounds of ammunition;
15. Black H&R .22 caliber revolver, Serial No. AD55588, and 9 live rounds of ammunition;
16. Black American Arms .22 caliber semi-automatic firearm, Model P98, Serial No. 030264, and three live rounds of ammunition;
17. Silver Hopkins & Allen .32 caliber revolver, Model 1901, Serial No. D431, and 6 live rounds of ammunition;
18. Black H&R .32 caliber revolver, Model 732, (serial no. obliterated), and 5 live rounds of ammunition;
19. Silver Sterling Arms .380 caliber handgun, Model Mark 3, Serial No. G53133, and 7 live rounds of ammunition;
20. Black Browning Arms .22 caliber long rifle, Model Challenger 2, Serial No. 655PM04913, and 8 live rounds of ammunition;
21. Mossberg 12-gauge shotgun, Model 600, Serial No. H372478; and
22. Black Glock30, .45 caliber handgun, Serial No. GUV502, one magazine, and 10 live rounds of ammunition.

b. Any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including the following:

1. \$1,800,000 U.S. currency.
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.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

**WILLIAM DORSEY,
a/k/a "Will,"
a/k/a "Sabor,"
BRAHEEM EDWARDS,
a/k/a "Broddie,"
NAIM BUTLER,
a/k/a "Nai,"
RONELL WHITEHEAD,
a/k/a "R,"
BREON BURTON,
a/k/a "Bre," and
KAREEM YORK,
a/k/a "Pedie"**

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

- (a) Forehand Revolver, Model 1901, serial number D431, and 6 live rounds of ammunition;
- (b) H&R Inc., Blue Steeled Revolver, Model 732, with an obliterated serial number, and 5 live rounds of ammunition;
- (c) Bryco Arms 9mm Luger, Model: Jennings, serial number 1361990, one magazine, and 13 rounds of ammunition; and
- (d) Black, Glock 30, .45 caliber handgun, serial number GUV502, one magazine, and 10 live 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

Christine E. Lopez for

ZANE DAVID MEMEGER
United States Attorney