

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>PARIS CHURCH AVERY MOSLEY a/k/a "Bok"</b>	:	<b>VIOLATIONS:</b>
	:	<b>21 U.S.C. § 846 (conspiracy to distribute 500 grams or more of cocaine – 1 count)</b>
	:	<b>21 U.S.C. § 841(a)(1) (distribution of cocaine - 2 counts)</b>
	:	<b>21 U.S.C. § 841 (possession with intent to distribute cocaine – 3 counts)</b>
	:	<b>21 U.S.C. 841(distribution of 500 grams or more of cocaine – 1 count)</b>
	:	<b>21 U.S.C. 841(possession with intent to distribute 500 grams or more of cocaine – 1 count)</b>
	:	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

1. From on or about December 16, 2013 through in or about April, 2014, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendant

**AVERY MOSLEY  
a/k/a "Bok"**

conspired and agreed, together and with Paris Church, charged elsewhere, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, 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:

2. Defendant AVERY MOSLEY and Paris Church supplied each other with cocaine for re-sale.

3. Defendant AVERY MOSLEY and Paris Church would share sources of supply in order to obtain cocaine.

4. Defendant AVERY MOSLEY and Paris Church combined their money in order to obtain kilogram and other quantities of cocaine for re-distribution.

5. Defendant AVERY MOSLEY and Paris Church exchanged telephone calls and text messages with each other in order to negotiate the sale and purchase of quantities of cocaine.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant AVERY MOSLEY and Paris Church committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 16, 2013, defendant AVERY MOSLEY and Paris Church used the telephone to discuss the availability of cocaine.

2. On or about December 27, 2013, Paris Church distributed approximately 28 grams of cocaine to defendant AVERY MOSLEY.

3. On or about January 13, 2014, defendant AVERY MOSLEY and Paris Church used the telephone to discuss the fact that defendant CHURCH should have used defendant MOSLEY'S source of supply to obtain cocaine. Defendant MOSLEY tells defendant CHURCH that defendant CHURCH would have saved thousands of dollars if he had used defendant MOSLEY'S source.

4. On or about January 15, 2014, Paris Church distributed approximately 500 grams of cocaine to defendant AVERY MOSLEY.

5. On or about January 31, 2014, defendant AVERY MOSLEY offered to arrange for Paris Church to purchase 500 grams of cocaine from defendant MOSLEY'S supplier.

6. On or about February 1, 2014, defendant AVERY MOSLEY and Paris Church discussed combining their money to purchase a kilogram of cocaine.

7. On or about February 7, 2014, defendant AVERY MOSLEY and Paris Church agree to combine their money in order to purchase 125 grams of cocaine

8. On or about February 8, 2014, Paris Church possessed with intent to distribute 625 grams of cocaine.

9. On or about February 9, 2014, Paris Church distributed approximately 187 grams of cocaine to defendant AVERY MOSLEY.

10. On or about February 17, 2014, defendant AVERY MOSLEY gave Paris Church \$2,000 towards the purchase of 125 grams of cocaine.

11. On or about February 21, 2014, defendant AVERY MOSLEY asked Paris Church to help him sell 125 grams of cocaine.

12. On or about March 26, 2014, defendant AVERY MOSLEY distributed approximately 63 grams of cocaine to Paris Church.

13. On or about April 3, 2014 defendant AVERY MOSLEY and Paris Church discussed the availability of cocaine.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**PARIS CHURCH**

knowingly and intentionally distributed approximately 28 grams of a mixture and substance  
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**AVERY MOSLEY,  
a/k/a "Bok,"**

knowingly and intentionally possessed with intent to distribute approximately 28 grams of a  
mixture and substance containing a detectable amount of cocaine, a Schedule II controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 15, 2014, in Chester, in the Eastern District of Pennsylvania,  
defendant

**PARIS CHURCH**

knowingly and intentionally distributed approximately 500 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)(B).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 15, 2014, in Chester, in the Eastern District of Pennsylvania,  
defendant

**AVERY MOSLEY  
a/k/a "Bok,"**

knowingly and intentionally possessed with intent to distribute 500 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)(B).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 9, 2014, in Chester, in the Eastern District of Pennsylvania,  
defendant

**AVERY MOSLEY**

knowingly and intentionally possessed with intent to distribute approximately 187 grams of a  
mixture and substance containing a detectable amount of cocaine, a Schedule II controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).



**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2014, in Chester, in the Eastern District of Pennsylvania,  
defendant

**AVERY MOSLEY,  
a/k/a "Bok,"**

knowingly and intentionally distributed approximately 63 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 EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2014, in Chester, in the Eastern District of Pennsylvania,  
defendant

**PARIS CHURCH**

knowingly and intentionally possessed with intent to distribute approximately 63 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).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 846, 841(a)(1), set forth in this indictment, defendants

**PARIS CHURCH and  
AVERY MOSLEY,  
a/k/a “Bok,”**

shall forfeit to the United States of America:

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses; and
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

---

**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**