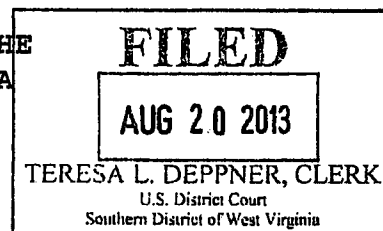


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON GRAND JURY
AUGUST 20, 2013 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:13-CR-00214

21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 922(k)
18 U.S.C. § 924(a)(1)(B)

CHANDRA K. ROSS

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

On or about July 18, 2013, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, defendant CHANDRA K. ROSS did knowingly and intentionally possess with intent to distribute a quantity of heroin, a Schedule I controlled substance.

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

COUNT TWO

On or about July 18, 2013, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, defendant CHANDRA K. ROSS did knowingly possess the following firearms in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, distribution of a quantity of heroin, in violation of Title 21, United States Code, Section 841(a)(1):

1. A Taurus, .22 caliber pistol;
2. A Remington, Model 1911, .45 caliber pistol;
3. An A.A. Arms, 9 mm pistol.

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

COUNT THREE

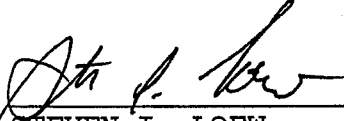
1. On or about July 18, 2013, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, defendant CHANDRA K. ROSS did knowingly possess a firearm, that is, a Taurus, .22 caliber revolver, which had the manufacturer's serial number obliterated and altered, and which firearm had been shipped and transported in interstate commerce.

2. At the time defendant CHANDRA K. ROSS possessed the aforesaid firearm, she knew that the manufacturer's serial number had been obliterated and altered.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

R. BOOTH GOODWIN II
United States Attorney

By:



STEVEN I. LOEW

Assistant United States Attorney