

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 03-_____
	:	
v.	:	DATE FILED: _____
	:	
LOCKSLEY MORGAN	:	VIOLATION: 8 U.S.C. §1326(a) and (b)(1)
a/k/a "Jordy Chams"	:	(Reentry after deportation - 1count)
a/k/a "David George Richards"	:	
a/k/a "Paul Brown"	:	
a/k/a "Rodney Gibbs"	:	
a/k/a "Apples"	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

LOCKSLEY MORGAN,
a/k/a "Jordy Chams"
a/k/a "David George Richards"
a/k/a "Paul Brown"
a/k/a "Rodney Gibbs"
a/k/a "Apples"

an alien, being a citizen of Jamaica, who had previously been deported from the United States on or about October 3, 1988, and was thereafter found in the United States, having knowingly and unlawfully reentered the United States without first applying to the United States Attorney General or the Secretary of the Department of Homeland Security for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission.

In violation of Title 8, United States Code, Sections 1326(a) and (b)(1) and Title

6, United States Code, Sections 202 (3) and (4) and 557.

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant LOCKSLEY MORGAN, a/k/a “Jordy Chams, “a/k/a “David George Richards, “ a/k/a “Paul Brown, “ a/k/a “Rodney Gibbs, “a/k/a “Apples, “ committed the offense charged in Count One of this Indictment after having been convicted of the following felony offense:

(1) On or about September 23, 1988, the defendant was sentenced for passport fraud in the United States District Court for the Southern District of New York, criminal complaint # 871943, which is a felony under the laws of the United States.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney