

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
JOSLYN MORGAN, JR.	:	VIOLATIONS: 21 U.S.C. § 846
	:	(Conspiracy to distribute cocaine - 1 count)
	:	21 U.S.C. §§ 846 and 841(a)(1) -
	:	(Attempt to possess with intent to
	:	distribute cocaine - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about 1999 through on or about March 3, 2001, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOSLYN MORGAN, JR.

conspired and agreed with other persons known and unknown to the grand jury, including but not limited to Robert J. Rimer, Joslyn A. Morgan, and David E. Wright (all charged elsewhere), to distribute and to possess with intent to distribute in excess of 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

MANNER AND MEANS

2. It was part of the conspiracy that defendant JOSLYN MORGAN, JR., would distribute and possess with intent to distribute cocaine in Philadelphia, Pennsylvania and its vicinity, including but not limited to New Jersey.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 20, 2000, Joslyn A. Morgan and David E. Wright did possess with intent to distribute and aid and abet the possession with intent to distribute of approximately one kilogram of cocaine.
2. On or about February 21, 2001, Joslyn A. Morgan and David E. Wright did possess with intent to distribute and aid and abet the possession with intent to distribute of approximately two kilograms of cocaine.
3. On or about February 22, 2001, Joslyn A. Morgan did possess with intent to distribute approximately one-half pound of cocaine.
4. On or about February 22, 2001, defendant JOSLYN MORGAN, JR. spoke by telephone with David E. Wright to arrange to pick up approximately one-half pound of cocaine.
5. Between on or about February 22, 2001 and on or about March 3, 2001, defendant JOSLYN MORGAN, JR. and David E. Wright discussed money owed by Robert J. Rimer for cocaine previously distributed to Rimer.
6. On or about March 3, 2001, defendant JOSLYN MORGAN, JR. attempted to collect money from Robert J. Rimer for kilogram quantities of cocaine previously “fronted” to Rimer by Joslyn A. Morgan and David E. Wright.

In violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

JOSLYN MORGAN, JR.

did knowingly and intentionally attempt to possess with intent to distribute approximately one-half pound of
a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney