



**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 18, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDREW ALEXANDER**

knowingly and intentionally distributed more than 50 grams, that is approximately 55.1 grams, of cocaine base (“crack”), a Schedule II controlled substance.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 28, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDREW ALEXANDER**

knowingly and intentionally distributed more than 5 grams, that is approximately 26.79 grams, of cocaine base (“crack”), a Schedule II controlled substance.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**ANDREW ALEXANDER**

knowingly and intentionally distributed more than 5 grams, that is approximately 26 grams, of  
cocaine base (“crack”), a Schedule II controlled substance.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 26, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDREW ALEXANDER**

did knowingly and intentionally possess with the intent to distribute more than 50 grams, that is approximately 180 grams, of cocaine base (“crack”), a Schedule II controlled substance.

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

**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. In committing the offenses charged in Counts One Through Five of this indictment, defendant Andrew Alexander:

a. Committed an offense and relevant conduct involving more than 150 grams of cocaine base, as described in U.S.S.G. § 2D1.1(a)(3).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Section 841 set forth in Counts One through Counts Five of this Indictment, the defendant,

**ANDREW ALEXANDER**

shall forfeit to the United States under Title 21, United States Code, Section 853:

(a) any and all real and/or personal property, including \$4,823.00 constituting proceeds, or derived from, any proceeds obtained directly or indirectly as the result of the violation of Title 21, United States Code as charged in this Indictment.

(b) any and all real and/or personal property which the defendant used in any manner or part to facilitate the commission of the violations of Title 21, United States Code as charged in this Indictment;

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

(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 subdivided 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 said defendant up to the value of the property subject to forfeiture.

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

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**