

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED _____
	:	
KRISTOFER CARL CADE	:	VIOLATIONS: 21 U.S.C. § 841(a)(1) (possession of cocaine base with intent to distribute – 2 counts) 21 U.S.C. § 952(a) (importation of cocaine – 1 count) Notice of additional factors

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 12, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

KRISTOFER CARL CADE

knowingly and intentionally possessed with intent to distribute approximately one gram of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWO

THE GRAND JURY CHARGES FURTHER THAT:

On or about November 30, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

KRISTOFER CARL CADE

knowingly and intentionally possessed with intent to distribute approximately one gram of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT THREE

THE GRAND JURY CHARGES FURTHER THAT:

On or about July 24, 2004, at Philadelphia International Airport, in the Eastern District of Pennsylvania, and elsewhere, defendant

KRISTOFER CARL CADE

knowingly and intentionally imported more than 500 grams, that is, approximately 3,000 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, into the United States from a place outside the United States, that is, Jamaica.

In violation of Title 21, United States Code, Sections 952(a), 960(a) and (b)(2)(B).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count Three of this indictment,
defendant

KRISTOFER CARL CADE

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

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney