

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

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
v. : DATE FILED: \_\_\_\_\_  
JEREMIAH KING : VIOLATIONS:  
: 21 U.S.C. § 841(a)(1)  
: (Distribution of cocaine base)  
: -- 1 count  
: 21 U.S.C. § 841(a)(1)  
: (Possession with the intent to  
: distribute five or more  
: grams of cocaine base) --  
: 1 count  
: 18 U.S.C. §§ 922(g)(1)  
: (Possession of firearm by a  
: convicted felon) -- 1 count  
: 21 U.S.C. § 853  
: (Notice of Forfeiture)

**I N D I C T M E N T**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

On or about November 23, 1998, in the City of Allentown, within the Eastern District of Pennsylvania, defendant

**JEREMIAH KING**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 1998, in the City of Allentown, within the Eastern District of Pennsylvania, defendant

**JEREMIAH KING**

knowingly and intentionally possessed with the intent to distribute five or more grams, that is, approximately 19 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 1998, in the City of Allentown, in the Eastern District of Pennsylvania, defendant

**JEREMIAH KING**

having been previously convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms and ammunition, that is:

1. A Ruger 9MM semiautomatic pistol, bearing serial number 303-45412, containing one fully loaded magazine of ammunition;
2. An H&R Arms 12-gauge sawed-off shotgun, bearing serial number 421024, loaded with one round of ammunition;
3. An Arms Corp Model 1600 .22 caliber semiautomatic rifle, bearing serial number A440666, containing one fully loaded magazine of ammunition;
4. A Ruger .357 caliber pistol, bearing serial number 157-68654, loaded with six rounds of ammunition; and
5. Additional rounds of ammunition for the above-listed firearms.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. The factual allegations contained in Counts One through Three of this Indictment are incorporated by reference and realleged here.

2. As a result of the violations of Title 21, United States Code, Section 841(a)(1) described in Counts One and Two of this Indictment, defendant

**JEREMIAH KING**

shall forfeit to the United States any and all property constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of the violations charged in Counts One and Two and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation charged in Counts One and Two, including but not limited to:

1. A Ruger 9MM semiautomatic pistol, bearing serial number 303-45412, containing one fully loaded magazine of ammunition;
2. An H&R Arms 12-gauge sawed-off shotgun, bearing serial number 421024, loaded with one round of ammunition;
3. An Arms Corp Model 1600 .22 caliber semiautomatic rifle, bearing serial number A440666, containing one fully loaded magazine of ammunition;
4. A Ruger .357 caliber pistol, bearing serial number 157-68654, loaded with six rounds of ammunition;
5. Additional rounds of ammunition for the above-listed firearms; and
6. \$667 in United States Currency,

all of which were recovered from the defendant on or about

November 23, 1998.

3. In the event the forfeitable property described in Paragraph 2 above, as a result of any act or omission 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 divided 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 the defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 853.

A TRUE BILL:

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FOREPERSON

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MICHAEL R. STILES  
United States Attorney