

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

UNITED STATES OF AMERICA : CRIMINAL NO. _____

V. : DATE FILED _____

CHRISTOPHER M. RICHARDS : VIOLATIONS: 21 U.S.C. § 846 (Conspiracy to
: distribute more than 100 kilograms
: of marijuana and to distribute more than
: 100 kilograms of marijuana within
: 1,000 feet of a playground-1 count)
:
: 21 U.S.C. § 846 (Attempted possession
: with intent to distribute more than 100
: kilograms of marijuana, in violation of
: 21 U.S.C. § 841(a)(1) -1 count)
:
: 21 U.S.C. § 846 (Attempted possession with
: intent to distribute more than 100
: kilograms of marijuana within 1,000 feet
: of a playground, in violation of 21
: U.S.C. § 860 - 1 count)
:
: 18 U.S.C. § 2 (Aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From at least in and around May 1998 through on or about October 18, 1999, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHRISTOPHER M. RICHARDS

knowingly and intentionally conspired and agreed, with persons known to the United States Attorney, to distribute and possess with intent to distribute more than 100 kilograms of marijuana,

a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and to distribute and possess with intent to distribute more than 100 kilograms of marijuana, a Schedule I Controlled Substance, within 1,000 feet of the real property comprising a playground, located at 3500 Scotts Lane, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 860.

MANNER AND MEANS

The following were all part of the conspiracy:

1. A person known to the United States Attorney (P-3) would buy large quantities of marijuana from a person known to the United States Attorney (P-5) in San Diego, California for distribution in and at Philadelphia, Pennsylvania.

2. P-5 would have the marijuana delivered to P-3 in San Diego, California in exchange for United States currency for later shipment of the marijuana to Philadelphia, Pennsylvania and for its distribution in and at Philadelphia.

3. P-3 would store and distribute the marijuana supplied by P-5 at a warehouse located within 1,000 feet of the real property comprising a playground, located at 3500 Scotts Lane, Philadelphia, Pennsylvania.

4. Defendant CHRISTOPHER M. RICHARDS would travel to San Diego, California and assist in purchasing and with loading the marijuana onto a truck for delivery to Philadelphia.

5. Defendant CHRISTOPHER M. RICHARDS conspired with persons known to the United States Attorney, referred to as P-1 through P-5, in this drug distribution conspiracy.

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. Within the several weeks before October 11, 1999, from Philadelphia and elsewhere, P-3 telephoned P-4 and P-5, who were in or near San Diego, California, for the purpose of arranging the purchase of a large quantity of marijuana.

2. Approximately several weeks before October 11, 1999, P-3 left Philadelphia with defendant CHRISTOPHER M. RICHARDS for the purpose of traveling to San Diego, California to purchase marijuana from P-5.

3. On this trip to San Diego, California, P-3 took approximately \$150,000 cash to pay P-5 for marijuana.

4. On or about October 11, 1999, P-4 met P-3 in or near San Diego, California for the purpose of arranging the delivery of approximately 860 pounds of marijuana to P-3.

5. Shortly before October 11, 1999, two persons known to the United States Attorney flew from Philadelphia, Pennsylvania to San Diego, California carrying approximately \$150,000 cash for P-3.

6. Shortly before October 11, 1999, two persons known to the United States Attorney delivered approximately \$150,000 cash to P-3 in or near San Diego, California.

7. On or about October 11, 1999, P-5 and P-4 received from P-3 approximately \$300,000 in United States currency as partial payment for marijuana that P-5 agreed to deliver to P-3.

8. On or about October 11, 1999, P-5 then agreed with P-3 to receive an additional

approximately \$73,000 to complete payment for the marijuana that P-5 agreed to supply P-3.

9. On or about October 11, 1999, P-5 arranged for the delivery of approximately 860 pounds of marijuana to P-3.

10. On or about October 7, 1999, P-2 rented a Ryder Rental Truck, that is, a 1997 Ford E350, painted yellow, FL license plate 3655OH, VIN 1GDKE37S4VHB24120, for the purpose of transporting marijuana to Philadelphia, Pennsylvania where P-2 and P-1 would deliver it to P-3.

11. On or about October 11, 1999, P-1, P-2, defendant CHRISTOPHER M. RICHARDS, and P-3 loaded approximately 16 boxes containing approximately 860 pounds of marijuana into the truck that P-2 had rented for the purpose of transporting the marijuana to Philadelphia, Pennsylvania.

12. On or about October 18, 1999, P-3 attempted to take delivery of the 16 boxes of marijuana from P-1 at P-3's marijuana warehouse which is located within 1,000 feet of the real property comprising a playground, located at 3500 Scotts Lane, Philadelphia, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 18, 1999, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER M. RICHARDS

knowingly and intentionally did aid and abet and wilfully cause the attempt to possess with intent to distribute more than 100 kilograms of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 18, 1999, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER M. RICHARDS

knowingly and intentionally did aid and abet and wilfully cause the attempt to possess with intent to distribute more than 100 kilograms of marijuana, a Schedule I Controlled Substance, within 1,000 feet of a playground, located at 3500 Scotts Lane in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 860.

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

MICHAEL R. STILES
UNITED STATES ATTORNEY

