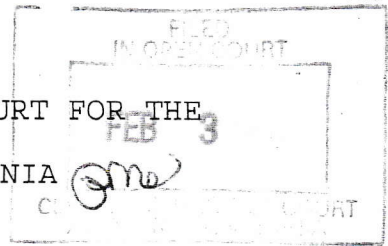


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	CRIMINAL NO. 00-00027-A
)	
v.)	Count 1: 21 USC § 846
)	(Conspiracy to Distribute LSD)
JERRY LEE ASHWORTH)	
)	Count 2: 21 USC § 841(a)(1) &
)	18 USC § 2 (Aiding & Abetting
)	the Distribution of LSD)
)	
)	Count 3: 21 USC § 853
)	(Forfeiture of Drug-Related
)	Assets)

FEBRUARY 2000 TERM - At Alexandria

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES THAT:

Beginning in or about 1997, and continuing thereafter up to in or about the date of this indictment, within the Eastern District of Virginia and elsewhere, the defendant, JERRY LEE ASHWORTH, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with Jason Alford and Steve Cordell, named as conspirators but not as defendants herein, and with others known and unknown to the grand jury to unlawfully, knowingly and intentionally distribute ten grams or more of a mixture and substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Ways, Manner and Means to Accomplish the Conspiracy

The primary purpose of the conspiracy was to make money through the distribution of LSD within the Eastern District of

Virginia and elsewhere. The ways, manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that the defendant and his conspirators played different roles, took upon themselves different tasks and participated in the affairs of the conspiracy through various criminal acts.

2. It was further part of the conspiracy that the defendant and his conspirators made themselves and their services available at various times throughout the conspiracy and participated in selected drug trafficking ventures on an "as needed" basis.

3. It was further part of the conspiracy that members of the conspiracy obtained quantities of LSD from a variety of sources which they distributed to others.

4. It was further part of the conspiracy that from in or about the summer of 1997, through in or about August, 1999, Jason Alford assisted the defendant in the conspiracy by sending LSD to various customers in the Eastern District of Virginia and elsewhere, and by retrieving money sent by customers as payment for LSD.

5. It was further part of the conspiracy that from in or about August, 1998, through in or about February, 1999, the defendant regularly sent thousands of dosage units of LSD to Steve Cordell in the Eastern District of Virginia for further distribution.

6. It was further part of the conspiracy that Steve Cordell regularly sent money from the Eastern District of Virginia to the defendant and to Jason Alford as payment for LSD.

7. It was further part of the conspiracy that the defendant and his conspirators used long distance telephone communications and telephone paging devices to facilitate their drug trafficking activities.

OVERT ACTS

In furtherance of the said conspiracy and to effect the objects thereof, the defendant and his conspirators committed overt acts in the Eastern District of Virginia and elsewhere including, but not limited to, the following:

1. In or about the summer of 1997, in San Francisco, California, the defendant recruited Jason Alford to assist him in sending packages containing LSD to the Eastern District of Virginia and elsewhere and to assist him in retrieving money sent by customers as payment for LSD.

2. In or about August, 1998, in Rockville, Maryland, the defendant distributed about 1,000 dosage units of LSD to Steve Cordell which was later distributed in the Eastern District of Virginia.

3. In or about December, 1998, in San Francisco, California, the defendant mailed about one pint of liquid LSD to Steve Cordell in the Eastern District of Virginia.

4. In or about January, 1999, in San Francisco, California, the defendant mailed about one-quarter pound of methamphetamine

and one-quarter pound of cocaine to Steve Cordell in the Eastern District of Virginia.

5. On or about February 3, 1999, in Silver Spring, Maryland, Jason Alford obtained \$3,400 in drug proceeds from Steve Cordell at the direction of the defendant.

6. In or about July, 1999, in San Francisco, California, the defendant supplied Jason Alford with about 3,000 dosage units of LSD which Alford later sent to Steven Cordell and another conspirator in the Eastern District of Virginia.

7. On or about August 5, 1999, in San Francisco, California, the defendant supplied Jason Alford with about 4,000 dosage units of LSD which Alford sent to Steven Cordell in the Eastern District of Virginia.

8. In or about August, 1999, in San Francisco, California, the defendant distributed about 10,000 dosage units of LSD to Jason Alford.

9. On or about August 12, 1999, in San Francisco, California, Jason Alford possessed about 4,000 dosage units which he had obtained from the defendant.

10. On or about August 12, 1999, in San Francisco, California, Jason Alford sent about 6,000 dosage units of LSD to a conspirator in Indianapolis, Indiana, at the direction of the defendant,

11. On or about October 17, 1999, the defendant contacted Jason Alford by telephone to ask him to account for the 10,000 dosage units of LSD distributed to Alford in August, 1999.

(In violation of Title 21, United States Code, Section 846)

COUNT 2

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 1999, in Manassas, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, JERRY LEE ASHWORTH, did unlawfully, knowingly and intentionally aid, abet, counsel, command, induce and procure the distribution of ten grams or more of a mixture and substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2)

COUNT 3

THE GRAND JURY FURTHER CHARGES THAT:

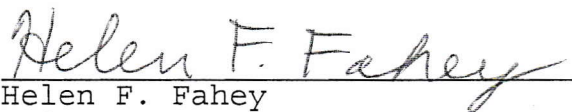
The defendant, JERRY LEE ASHWORTH, if convicted of Count 1 of this indictment, shall forfeit to the United States any property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation; and any substitute for such property under Title 21, United States Code, Section 853(p).

(Pursuant to Title 21, United States Code, Section 853)

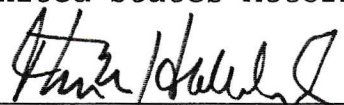
A TRUE BILL:



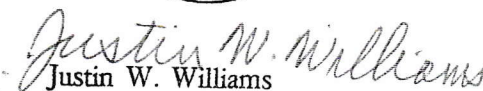
FOREPERSON OF THE GRAND JURY



Helen F. Fahey
United States Attorney



Thomas M. Hollenhorst
Assistant United States Attorney

by: 
Justin W. Williams
Assistant United States Attorney
Chief, Criminal Division

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Virginia

Alexandria Division

THE UNITED STATES OF AMERICA

vs.

JERRY LEE ASHWORTH

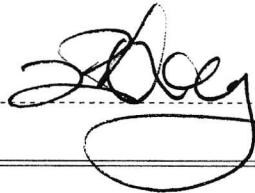
INDICTMENT

COUNT 1 - CONSPIRACY TO DISTRIBUTE LSD - 21 USC §846

COUNT 2 - AIDING & ABETTING DISTRIBUTION OF LSD - 21 USC §§841(a)(1), (2)

COUNT 3 - FORFEITURE OF DRUG RELATED ASSETS - 21 USC §853

A true bill.



Foreman

Filed in open court this _____ day,

of _____ A.D. 19 _____

Clerk

Bail, \$ _____