

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

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

ANTHONY REID, : VIOLATIONS:
a/k/a "Spooks,"
BRIAN WILLIAMS, : 18 U.S.C. § 1951(a) (conspiracy to commit
a/k/a "Jimmy"
: robbery which interfered with interstate
commerce - 1 count)
: 18 U.S.C. § 1951(a) (robbery which
interfered with interstate commerce
- 1 count)
: 18 U.S.C. § 924(c)(1) (carrying and using
firearms during a crime of violence
- 1 count)
: 18 U.S.C. §§ 922(g)(1), 924(c)
(convicted felon in possession of a firearm
- 1 count)
: 18 U.S.C. § 2 (aiding and abetting)
: Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The Sunoco APlus gas station and convenience store, located at 301 South 52nd Street in Philadelphia, Pennsylvania, was a business engaged in interstate commerce.
2. Pendum LLC (Pendum), is a Colorado corporation that is the nation's largest independent provider of automated teller machine (ATM) and branch equipment, including armored services for supplying cash to ATMs. Pendum has a fleet of 500 armored vehicles and does business in 42 states, and was a business engaged in interstate commerce.

THE ROBBERY CONSPIRACY

3. On or about September 4, 2009, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY REID,
a/k/a “Spooks,” and
BRIAN WILLIAMS,
a/k/a “Jimmy”**

conspired and agreed, together to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants REID and WILLIAMS conspired to unlawfully take and obtain money and other items of value from an employee of Pendum and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

4. It was part of this conspiracy that defendants ANTHONY REID and BRIAN WILLIAMS planned to steal money and property at gunpoint from Pendum by waiting until Pendum employees made a delivery of U.S. currency to the ATMs at the Sunoco APlus gas station and convenience store, by forcing that employee to relinquish the money for the ATMs by using a loaded firearm while threatening to use physical violence, and using physical violence, to acquire the money and property in the possession of the Pendum employee.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants ANTHONY REID and BRIAN WILLIAMS committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about September 4, 2009:

1. Defendants ANTHONY REID and BRIAN WILLIAMS went to the Sunoco APlus gas station and convenience store, at 301 South 52nd Street in Philadelphia, Pennsylvania, to rob armored guards working for Pendum as they made a cash delivery to two ATMs inside the Sunoco APlus convenience store.
2. While inside the Sunoco APlus gas station and convenience store, defendants ANTHONY REID and BRIAN WILLIAMS approached an Pendum armored guard, and demanded that the guard hand them a bank deposit bag filled with approximately \$100,000 in U.S. currency. When demanding the money from the guard, defendant WILLIAMS placed a loaded firearm against the back of the guard's head, and then struck the guard in the face with his fist, knocking him to the ground.
3. Defendants ANTHONY REID and BRIAN WILLIAMS stole the bag containing approximately \$100,000 in U.S. currency and a Smith & Wesson, model number 40 EV, .40 caliber semi-automatic handgun, serial number DSJ1031, loaded with 14 rounds of ammunition from the Pendum armored guard inside the Sunoco APlus gas station and convenience store.
4. Defendants ANTHONY REID and BRIAN WILLIAMS fled on foot from the Sunoco APlus gas station and convenience store and entered a black Mazda sedan parked

nearby. Defendant REID fled with defendant WILLIAMS by driving the black Mazda away from the scene. While fleeing, defendant WILLIAMS pointed a loaded firearm at the Philadelphia Police cars behind him and discharged it at the pursuing police officers.

5. While driving the Mazda and continuing to flee from the police, defendant ANTHONY REID struck a white minivan occupied by a civilian at the intersection of 50th Street and Cedar Avenue in Philadelphia, Pennsylvania. Defendant REID did not stop at the accident scene, but continued to flee from police.

6. As defendants ANTHONY REID and BRIAN WILLIAMS were fleeing from police, defendant REID then drove the black Mazda into a parked vehicle near the intersection of 63rd Street and Grays Ferry Avenue in Philadelphia, Pennsylvania. After the Mazda came to a complete stop, defendant REID opened the front door of the Mazda and pointed a loaded firearm at approaching police officers. Defendant BRIAN WILLIAMS attempted to escape from police by crawling through the front passenger window of the black Mazda.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1,2 and 4, and Overt Act 1 through 6 of Count One of this indictment are incorporated here.
2. On or about September 4, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY REID,
a/k/a "Spooks," and
BRIAN WILLIAMS,
a/k/a "Jimmy"**

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants REID and WILLIAMS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from employees of Pendum LLC inside the Sunoco APlus gas station and convenience store at 301 South 52nd Street in Philadelphia, Pennsylvania, in the presence of an employee and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, by pointing a firearm at, demanding money from, punching, and otherwise assaulting and threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1,2 and 4, and Overt Act 1 through 6 of Count One of this indictment are incorporated here.
2. On or about September 4, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY REID,
a/k/a "Spooks," and
BRIAN WILLIAMS,
a/k/a "Jimmy"**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is:

- (1) a Smith & Wesson, model number 40 EV, .40 caliber semi-automatic handgun, serial number DSJ1031, loaded with 14 rounds of ammunition; &
- (2) a Hi-Point, model number CF 380, .380 caliber semi-automatic handgun, serial number P910668, loaded with seven rounds of ammunition,

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, conspiracy to commit robbery which interfered with interstate commerce, and robbery which interfered with commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY REID,
a/k/a "Spooks," and
BRIAN WILLIAMS,
a/k/a "Jimmy,"**

having been 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 interstate commerce a firearm, that is:

- (1) a Smith & Wesson, model number 40 EV, .40 caliber semi-automatic handgun, serial number DSJ1031, loaded with 14 rounds of ammunition; &
- (2) a Hi-Point, model number CF 380, .380 caliber semi-automatic handgun, serial number P910668, loaded with seven rounds of ammunition,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c) and 922(g)(1), set forth in this indictment, defendants

**ANTHONY REID,
a/k/a "Spooks," and
BRIAN WILLIAMS,
a/k/a "Jimmy"**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of this offense, including, but not limited to:

- (1) a Smith & Wesson, model number 40 EV, .40 caliber semi-automatic handgun, serial number DSJ1031;
- (2) 14 rounds of .40 caliber ammunition;
- (3) a Hi-Point, model number CF 380, .380 caliber semi-automatic handgun, serial number P910668; and
- (4) seven rounds of .380 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
United States Attorney**