

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>ISHMAEL SHAH</b>	<b>:</b>	<b>VIOLATIONS:</b>
		<b>18 U.S.C. § 1951(a) (robbery</b>
		<b>which interferes with interstate commerce</b>
		<b>- 5 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (attempted robbery which</b>
		<b>interferes with interstate commerce - 2</b>
		<b>counts)</b>
		<b>18 U.S.C. § 924(c)(1) (brandishing, using,</b>
		<b>and carrying a firearm during and in</b>
		<b>relation to a crime of violence - 5 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, Metro Self Storage was a business engaged in interstate commerce, with locations across the United States including but not limited to 2240 Island Avenue, Philadelphia, Pennsylvania. Metro Self Storage leases self-storage units to customers. The Metro Self Storage located at 2240 Island Avenue, Philadelphia, Pennsylvania sells packing and moving supplies produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about June 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$300, from an employee of Metro Self Storage, located at 2240 Island Avenue, Philadelphia, Pennsylvania, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using and brandishing a handgun at a Metro Self Storage employee and ordering the employee at gunpoint to open the register and safe.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**ISHMAEL SHAH**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count One of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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

### **COUNT THREE**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Gulla's Auto Tag & Insurance, 6301 Buist Avenue, Philadelphia, Pennsylvania was a business engaged in interstate commerce. Gulla's Auto Tag & Insurance sells temporary in-transit registration credentials for \$50 each to customers who come from out of state, including but not limited to Delaware and New Jersey, and who purchase vehicles in Pennsylvania and plan to transport the vehicles to their home state and register the vehicles in their home state.

2. On or about June 17, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

#### **ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$5200, from employees of Gulla's Auto Tag & Insurance, located at 6301 Buist Avenue, Philadelphia, Pennsylvania, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using and brandishing handguns at Gulla's Auto Tag & Insurance employees and demanding money at gunpoint.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 17, 2013, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**ISHMAEL SHAH**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, handguns, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Three of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Sunoco was a business engaged in interstate commerce, with gas station/convenience store locations across the United States including but not limited to 2500 Island Avenue, Philadelphia, Pennsylvania. The Sunoco gas station/convenience store located at 2500 Island Avenue, Philadelphia, Pennsylvania sells merchandise produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about June 21, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$331, from an employee of the Sunoco gas station/convenience store, located at 2500 Island Avenue, Philadelphia, Pennsylvania, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property, that is, by using and brandishing a handgun at a Sunoco gas station/convenience store employee and taking money from the register.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Kerrs Building Materials Inc., 1528 Washington Avenue, Philadelphia, Pennsylvania was a business engaged in interstate commerce and sold building materials that were produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about June 22, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$2400, from employees of Kerrs Building Materials, Inc., located at 1528 Washington Avenue, Philadelphia, Pennsylvania, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using and brandishing a handgun at Kerrs Building Materials employees and demanding money.

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 22, 2013, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**ISHMAEL SHAH**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Six of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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



## **COUNT EIGHT**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, 7-Eleven was a business engaged in interstate commerce, with store locations across the United States including but not limited to 501 Church Lane, Yeadon, Pennsylvania. The 7-Eleven store located at 501 Church Lane, Yeadon, Pennsylvania sells food and other merchandise that was produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about June 26, 2013, in Yeadon, in the Eastern District of Pennsylvania, defendant

### **ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully attempted to take and obtain, and aided and abetted the unlawful attempted taking and obtaining of, property, that is, money, from an employee of 7-Eleven, located at 501 Church Lane, Yeadon, Pennsylvania, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using and brandishing a handgun at the 7-Eleven employee.

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

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, 7-Eleven was a business engaged in interstate commerce, with store locations across the United States including but not limited to 1028 Garrett Road, Upper Darby, Pennsylvania. The 7-Eleven store located at 1028 Garrett Road, Upper Darby, Pennsylvania sells food and other merchandise that was produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about June 28, 2013, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$200, from an employee of 7-Eleven, located at 1028 Garrett Road, Upper Darby Pennsylvania, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using and brandishing a handgun at the 7-Eleven employee.

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

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 28, 2013, in Upper Darby, in the Eastern District of Pennsylvania,  
defendant

**ISHMAEL SHAH**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Nine of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Kicks USA was a business engaged in interstate commerce, with locations in Pennsylvania and New Jersey including but not limited to 1575 N. 52nd Street, Philadelphia, Pennsylvania. Kicks USA sells shoes and clothing to customers. The Kicks USA located at 1575 N. 52nd Street, Philadelphia, Pennsylvania sells shoes and clothing produced in and transported from outside the Commonwealth of Pennsylvania.

2. On or about July 11, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ISHMAEL SHAH**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SHAH unlawfully attempted to take and obtain, and aided and abetted the unlawful attempted taking and obtaining of, property, that is, money, from employees of Kicks USA, located at 1575 N. 52nd Street, Philadelphia, Pennsylvania, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using and brandishing guns at the Kicks USA employees.

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

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 11, 2013, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**ISHMAEL SHAH**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a shotgun and a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Eleven of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER**  
United States Attorney