

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MARCUS JONES,	:	VIOLATIONS:
a/k/a “J-Rock”	:	18 U.S.C. § 1951(a) (conspiracy to
JONTE KING,	:	commit robbery which interferes with
a/k/a “Gun”	:	interstate commerce - 1 count)
MALEEK BROWN,	:	18 U.S.C. § 1951(a) (robbery which
a/k/a “Leek”	:	interferes with interstate commerce – 3
	:	counts)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during and in relation to a
		crime of violence – 3 counts)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Peralta Grocery Store (“Peralta”), located at 6935 Dicks Avenue, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce, by providing to customers food and beverages produced, purchased, and transported from other states to Pennsylvania.

2. Golden Kingdom II Restaurant (“Golden Kingdom”), located at 7100 Elmwood Avenue, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce, by providing to customers food and beverages produced, purchased, and transported from other states to Pennsylvania.

3. From on or about March 14, 2012 to on or about March 24, 2012, in the Eastern District of Pennsylvania, defendants

**MARCUS JONES
a/k/a “J-Rock,”
JONTE KING
a/k/a “Gun,” and
MALEEK BROWN,
a/k/a “Leek,”**

conspired and agreed together to commit robberies, which robberies would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants JONES, KING, and BROWN conspired to unlawfully take and obtain United States currency and other items from the employees of Peralta and Golden Kingdom against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, property, and property in their possession, all in violation of Title 18, United States Code, Sections 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

4. Defendants MARCUS JONES and JONTE KING met and together planned to rob Peralta and Golden Kingdom by using firearms, force, and threats of force, to obtain United States currency.

5. Defendants MARCUS JONES and JONTE KING obtained firearms to use in the robberies.

OVERT ACTS

From on or about March 14, 2012 to on or about March 24, 2012, in furtherance of the conspiracy and to accomplish its object, defendants MARCUS JONES, JONTE KING, and MALEEK BROWN committed the following overt acts, among others, in the Eastern District of Pennsylvania:

Peralta Grocery Store Robbery on March 14, 2012

On or about March 14, 2012:

1. Defendants MARCUS JONES and JONTE KING met with defendant MALEEK BROWN to commit a gun-point robbery. Defendants JONES and KING had guns.
2. Defendant MALEEK BROWN drove defendants MARCUS JONES and JONTE KING in a silver Pontiac Grand Prix (“the car”) past Peralta, and defendants JONES and KING decided to target Peralta for the robbery. Defendant BROWN agreed to act as the getaway driver after the robbery.
3. Prior to the robbery, defendant MALEEK BROWN went inside Peralta to observe the layout of the store while defendants MARCUS JONES and JONTE KING waited in the car. Defendant BROWN returned to the car and reported the layout of the store to defendants JONES and KING to familiarize them with the store before committing the robbery.
4. Defendant MALEEK BROWN waited in the car while defendants MARCUS JONES and JONTE KING entered Peralta, both armed with guns, and demanded money from the store clerks.
5. Defendants MARCUS JONES and JONTE KING fled back to the car with the money obtained from the clerk, and defendant BROWN drove them away from the area.

6. Defendants MARCUS JONES, JONTE KING, and MALEEK BROWN divided the proceeds from the robbery.

Golden Kingdom II Restaurant Robbery on March 24, 2012

On or about March 24, 2012:

7. Defendants MARCUS JONES and JONTE KING met and together targeted Golden Kingdom for a gun-point robbery.

8. Defendants MARCUS JONES and JONTE KING entered the Golden Kingdom. Defendant JONES pointed a gun at one of the employees and demanded cash.

9. Defendant KING took cash from the cash register.

10. Defendants MARCUS JONES and JONTE KING fled from the robbery on foot.

11. Defendants MARCUS JONES and JONTE KING divided the proceeds from the robbery.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 of Count One and Overt Acts numbered 1-6 are incorporated here.
2. On or about March 14, 2012, in the Eastern District of Pennsylvania, defendants

**MARCUS JONES,
a/k/a “J-Rock,”
JONTE KING,
a/k/a “Gun,” and
MALEEK BROWN,
a/k/a “Leek”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants MARCUS JONES, JONTE KING, and MALEEK BROWN unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, United States currency, from the Peralta Grocery Store, in the presence of its employees, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees’ persons and property in their possession, that is, by brandishing a gun at and otherwise threatening the employees.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2012, in the Eastern District of Pennsylvania, defendants

**MARCUS JONES,
a/k/a “J-Rock,”
JONTE KING,
a/k/a “Gun,” and
MALEEK BROWN,
a/k/a “Leek,”**

knowingly used and carried, and aided and abetted in the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit robbery which interferes with interstate commerce, and robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and brandished that firearm.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Aya's Pizza, located at 7144 Elmwood Avenue, in Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce, by providing to customers food and beverages produced, purchased, and transported from other states to Pennsylvania.

2. On or about March 22, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARCUS JONES,
a/k/a "J-Rock"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant JONES unlawfully took and obtained approximately \$500 in United States currency, from Aya's Pizza, in the presence of its employees, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' persons and property in their possession, that is, by brandishing a gun at an employee's head and demanding cash from the employee.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2012, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**MARCUS JONES,
a/k/a “J-Rock,”**

knowingly used and carried a firearm, that is, a semiautomatic 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,
Section 1951(a).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 2 of Count One and Overt Acts numbered 7-11 are incorporated here.
2. On or about March 24, 2012, in the Eastern District of Pennsylvania, defendants

**MARCUS JONES,
a/k/a “J-Rock” and
JONTE KING
a/k/a “Gun”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants MARCUS JONES and JONTE KING unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, United States currency, from the Golden Kingdom II Restaurant, in the presence of its employees, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the owners and employees’ persons and property in their possession, that is, by brandishing a gun at and otherwise threatening the employees.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2012, in the Eastern District of Pennsylvania, defendants

**MARCUS JONES,
a/k/a “J-Rock,” and
JONTE KING,
a/k/a “Gun,”**

knowingly used and carried, and aided and abetted in the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit robbery which interferes with interstate commerce, and robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and brandished that firearm.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney