

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

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM 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

NASIR TRAYNHAM

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

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM 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

NASIR TRAYNHAM

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, Kerrs Building Materials Inc., 1528 Washington Avenue, Philadelphia, Pennsylvania was a business engaged in interstate commerce and sold building materials that are 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

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM 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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

NASIR TRAYNHAM

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 Five 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 SEVEN

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 is 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

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM 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 EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Papa John's Pizza was a business engaged in interstate commerce, with store locations across the United States including but not limited to 7 N. Lansdowne Avenue, Lansdowne, Pennsylvania. The Papa John's Pizza located at 7 N. Lansdowne Avenue, Lansdowne, Pennsylvania sells food and other merchandise that is produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about July 3, 2013, in Lansdowne, in the Eastern District of Pennsylvania, defendant

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money in the amount of approximately \$647, from employees of Papa John's Pizza, located at 7 N. Lansdowne Avenue, Lansdowne, 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 Papa John's Pizza employees and demanding money from the safe and cash register.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 3, 2013, in Lansdowne, in the Eastern District of Pennsylvania,
defendant

NASIR TRAYNHAM

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, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Eight 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 TEN

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

NASIR TRAYNHAM

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TRAYNHAM 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 ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

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

NASIR TRAYNHAM

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 Ten 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:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney