

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
LAMAR RAYSON	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (conspiracy to interfere with interstate commerce by robbery - 1 count)
	:	18 U.S.C. § 924(c)(1) (carrying and using a firearm during a crime of violence - 1count)
	:	18 U.S.C. §2 (aiding and abetting - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this information, the following businesses (the “Businesses”) located in Philadelphia, Pennsylvania were engaged in interstate commerce:

- a) 7-11 convenience store, 6919 Torresdale Avenue;
- b) Hong Kong Chinese Restaurant, 8052 Frankford Avenue;
- c) Long Yuan Restaurant, 6634 Frankford Avenue;
- d) Palm Tree Chinese Restaurant, 6548 Torresdale Avenue; and
- e) Lee’s Chinese Restaurant, 9226 Ashton Road.

2. From on or about February 8, 2005 to on or about March 8, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

LAMAR RAYSON

conspired and agreed together, and with other persons known to the United States Attorney, to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, in that the defendant agreed to unlawfully take and obtain currency from businesses engaged in interstate commerce, in the presence of employees of the Businesses, against their will, by means of actual and threatened force, violence, and fear of injury,

immediate and future, to their person and property in their control, all in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

MANNER AND MEANS

3. It was part of the conspiracy to rob the Businesses by use of force, threats of force and violence, and through the use of firearms.

OVERT ACTS

In furtherance of the conspiracy, the defendant and others known to the United States Attorney committed the following overt acts, among others, from on or about February 8, 2005 to on or about March 8, 2005, in the Eastern District of Pennsylvania and elsewhere:

1. On or about February 8, 2005, defendant LAMAR RAYSON and others known to the United States Attorney robbed the 7-11 convenience store located at 6919 Torresdale Avenue, Philadelphia, Pennsylvania at gunpoint and stole approximately \$200.

2. On or about February 8, 2005, defendant LAMAR RAYSON and others known to the United States Attorney robbed the Hong Kong Chinese Restaurant located at 8052 Frankford Avenue, Philadelphia, Pennsylvania at gunpoint and stole approximately \$300.

3. On or about February 28, 2005, defendant LAMAR RAYSON and others known to the United States Attorney robbed the Long Yuan Chinese Restaurant located at 6634 Frankford Avenue, Philadelphia, Pennsylvania at gunpoint and stole approximately \$500.

4. On or about March 7, 2005, defendant LAMAR RAYSON and others known to the United States Attorney robbed the Palm Tree Chinese Restaurant located at 6548 Torresdale Avenue, Philadelphia, Pennsylvania at gunpoint and stole approximately \$450.

5. On or about March 8, 2005, defendant LAMAR RAYSON and others known to the United States Attorney robbed Lee's Chinese Restaurant located at 9226 Ashton Road, Philadelphia, Pennsylvania at gunpoint and stole approximately \$300.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1a and Overt Act 1 of Count One of this information are incorporated here.
2. On or about February 8, 2005, in the Eastern District of Pennsylvania, defendant

LAMAR RAYSON,

and others known to the United States Attorney, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery of the 7-11 convenience store, in violation of Title 18, United States Code, Section 1951.

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

PATRICK L. MEEHAN
United States Attorney