

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
HAROLD SIDNEY BRUNSON, a/k/a "Shawn Johnson," a/k/a "Sid"	:	VIOLATIONS: 18 U.S.C. § 1951(a) (substantive Hobbs Act robbery - 7 counts) 18 U.S.C. § 924(c)(1) (using and carrying a firearm during and in relation to a crime of violence - 7 counts) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Primo's Pizza, located at 2859 Holme Avenue in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about August 5, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"

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

to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Primo's Pizza, in the presence of employees of that business, 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 forcing the employees at gunpoint to the floor and shooting one employee in the stomach as that employee attempted to flee.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count One of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Galaxy Pizza, located at 1239 Cottman Avenue in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about August 19, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Galaxy Pizza, in the presence of an employee and customer of that business, 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 forcing the employees at gunpoint to the back of the store and into the rear storage area.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Three of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The Ashton Pub, located at 9041 Ashton Road in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about September 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to The Ashton Pub, in the presence of employees of that business, 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 forcing the employees at gunpoint to the back of the bar and into the rear storage area.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Five of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Maxim Hair Studio, located at 2447 Tremont Street in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about April 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Maxim Hair Studio, in the presence of an employee of that business, 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 forcing the employee at gunpoint to the bathroom.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm, and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Seven of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Vince's Service Station, located at 7700 Ditman Street in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about April 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the Grand Jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Vince's Service Station, in the presence of an employee and customer of that business, 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 forcing the employee and customer at gunpoint into the rear garage.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Nine of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Bill's Family Pizza located at 8200 Frankford Avenue in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about April 15, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the Grand Jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Bill's Family Pizza, in the presence of employees of that business, 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 forcing the employees at gunpoint into the store's walk-in freezer.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Eleven of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Alfred's Beverage Corporation, located at 9218 Ashton Road in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its' business, which affected interstate commerce.

2. On or about April 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a "Shawn Johnson,"
a/k/a "Sid,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant and others known and unknown to the Grand Jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money belonging to Alfred's Beverage Corporation, in the presence of an employee of that business and the employee's friend, 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 forcing the employees at gunpoint into the store's walk-in freezer.

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

knowingly used and carried a firearm and aided and abetted the use and carrying of a firearm, that is, two 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, interference with interstate commerce by robbery, as charged in Count Thirteen of this indictment, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

FORFEITURE - 18 U.S.C. § 924(d)

1. As a result of the violations of Title 18, United States Code, Section 924(c)(1), set forth in this indictment, defendant

**HAROLD SIDNEY BRUNSON,
a/k/a “Shawn Johnson,”
a/k/a “Sid,”**

shall forfeit to the United States of America, the firearms involved in the commission of these offenses, including, but not limited to:

- (1) a loaded silver Jennings .22 caliber semi-automatic handgun
, serial number 1094830

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

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**