

**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>LEMUEL BARR,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Pumpkin,"</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>a/k/a "Philly,"</b>	<b>:</b>	<b>armed bank robbery - 1 count)</b>
<b>a/k/a "Geez,"</b>	<b>:</b>	<b>18 U.S.C. § 2113(d) (armed bank robbery</b>
<b>a/k/a "Shafiq"</b>	<b>:</b>	<b>- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying and using</b>
	<b>:</b>	<b>a firearm during a crime of violence - 1</b>
	<b>:</b>	<b>count)</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, the Beneficial Savings Bank, located at 1411 Rhawn Street, Philadelphia, Pennsylvania ("Beneficial Savings Bank"), was insured by the Federal Deposit Insurance Corporation.
2. On or about December 22, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LEMUEL BARR,  
a/k/a "Pumpkin,"  
a/k/a "Philly,"  
a/k/a "Geez,"  
a/k/a "Shafiq,"**

conspired and agreed, together with Jeremy Drake and Raheem Mercer, charged elsewhere, and another person known to the grand jury, to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the Beneficial Savings Bank, in violation of Title 18, United States Code, Section 2113(d).

**MANNER AND MEANS**

3. It was part of the conspiracy that defendant LEMUEL BARR, along with Jeremy Drake, Raheem Mercer and another person known to the grand jury (“Person #1”), planned and executed a gun-point robbery of the Beneficial Savings, during which they stole approximately \$9,007.

**OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendant LEMUEL BARR, together with Jeremy Drake, Raheem Mercer and Person #1, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about December 22, 2006:

1. Person #1 gave a revolver to defendant LEMUEL BARR for use during the robbery.
2. Person #1 drove and dropped off defendant LEMUEL BARR and Raheem Mercer approximately one block away from the Beneficial Savings Bank.
3. While Jeremy Drake waited outside the bank in another vehicle, defendant LEMUEL BARR and Raheem Mercer entered the Beneficial Savings Bank. Defendant BARR pointed a revolver at the head of the bank manager and ordered bank employees to open the door near the teller counter. Mercer grabbed money from one of the teller drawers and put the money into a bag. Defendant BARR and Mercer stole approximately \$9,007 in cash.
4. Defendant LEMUEL BARR and Raheem Mercer fled from the bank to the getaway vehicle, where Jeremy Drake was waiting for them. After defendant BARR and Mercer entered the getaway vehicle, Drake drove off.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 22, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LEMUEL BARR,  
a/k/a "Pumpkin,"  
a/k/a "Philly,"  
a/k/a "Geez,"  
a/k/a "Shafiq,"**

knowingly and unlawfully, by force, violence, and intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$9,007, from employees of the Beneficial Savings Bank, 1411 Rhawn Street, Philadelphia, Pennsylvania, belonging to, and in the care, custody, control, and management and possession of the Beneficial Savings Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Beneficial Savings Bank and other persons, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 22, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

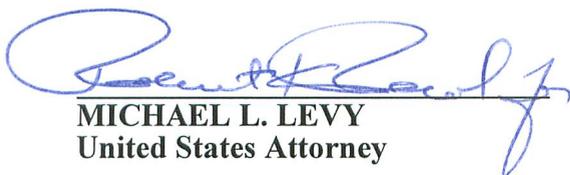
**LEMUEL BARR,  
a/k/a "Pumpmin,"  
a/k/a "Philly,"  
a/k/a "Geez,"  
a/k/a "Shafiq,"**

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, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

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

**A TRUE BILL:**

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**FOREPERSON**

  
**MICHAEL L. LEVY**  
**United States Attorney**