

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 08- 636**
v. : **DATE FILED: March 25, 2009**
KEITH WATERS : **VIOLATIONS:**
: **18 U.S.C. § 1951(a) (interference with**
: **interstate commerce by robbery -**
: **2 counts)**
: **18 U.S.C. § 924(c)(1) (carrying and using**
: **a firearm during a crime of violence -**
: **2 counts)**
: **Notice of forfeiture**

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Steinberg Plumbing, located at 430 Crest Avenue in Melrose Park, Pennsylvania, was engaged in interstate commerce.

2. On or about September 7, 2007, in Melrose Park, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

KEITH WATERS

obstructed, delayed, and affected interstate commerce and the movement of articles and commodities in commerce, by robbery, in that defendant WATERS unlawfully took and obtained approximately \$4,300 in cash, and a vehicle, from the person or in the presence of the owner and employees of the business and 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 pointing a semi-automatic handgun at the the owner and employees, and demanding money.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Steinberg Plumbing, located at 430 Crest Avenue in Melrose Park, Pennsylvania, was engaged in interstate commerce.

2. On or about September 7, 2007, in Melrose Park, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

KEITH WATERS

knowingly used and carried 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, interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, the Cheltenham Check Cashing Agency, located at 417 W. Cheltenham Avenue in Elkins Park, Pennsylvania, engaged in interstate commerce.

2. On or about January 17, 2008, in Elkins Park, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

KEITH WATERS

obstructed, delayed, and affected interstate commerce and the movement of articles and commodities in commerce, by robbery, in that defendant WATERS unlawfully took and obtained approximately \$115,000 in cash, from the person or in the presence of the owner and employee of the business and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by pointing a semi-automatic handgun at the owner, demanding money, and shooting the owner.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, the Cheltenham Check Cashing Agency, located at 417 W. Cheltenham Avenue in Elkins Park, Pennsylvania, engaged in interstate commerce.

2. On or about January 17, 2008, in Elkins Park, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

KEITH WATERS

knowingly used and carried a firearm, that is, a Glock 17 pistol, serial number FDD523, 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, in violation of Title 18, United States Code, Section 1951(a).

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

KEITH WATERS

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of this offense, including, but not limited to:

1. One Glock 17 pistol, serial number FDD523, and magazine for a 9mm Glock 17;
2. One box of 9mm ammunition; and
3. One round of 9mm Luger ammunition.

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

LAURIE MAGID
United States Attorney