

**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>BRANDON BRUNSON</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (robbery which</b>
	<b>:</b>	<b>interfered with interstate commerce</b>
	<b>:</b>	<b>- 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (using and carrying</b>
	<b>:</b>	<b>a firearm during a crime of violence</b>
	<b>:</b>	<b>- 4 counts)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Kang's Mini Market, located at 5101 Wayne Avenue in Philadelphia, Pennsylvania, was a business engaged in interstate commerce.
2. On or about January 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant BRUNSON unlawfully took and obtained cash from the Kang's Mini Market located at 5101 Wayne Avenue, in Philadelphia, in the presence of employees of the Kang's Mini Market and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of Kang's Mini

Market, by pointing a firearm at, demanding money from, and otherwise threatening them.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

knowingly used and carried a firearm, that is, a handgun, black in color, 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 interfered with interstate commerce, 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:**

At all times material to this indictment:

1. Ed's Pizza House, located at 5022 Wayne Avenue in Philadelphia, Pennsylvania, was a business engaged in interstate commerce.
2. On or about February 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant BRUNSON unlawfully took and obtained cash from the Ed's Pizza House, located at 5022 Wayne Avenue, in Philadelphia, in the presence of employees of Ed's Pizza House and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of Ed's Pizza House, by pointing a firearm at, demanding money from, and otherwise threatening them.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

knowingly used and carried a firearm, that is, a loaded Ruger 9mm semi-automatic pistol, model P95, serial number 316-93431, black in color, and 11 rounds of ammunition, 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 interfered with interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraph 1 of Count Three of this indictment is incorporated here.
2. On or about February 22, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant BRUNSON unlawfully took and obtained cash from the Ed's Pizza House, located at 5022 Wayne Avenue, in Philadelphia, in the presence of employees of Ed's Pizza House and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of Ed's Pizza House, by pointing a firearm at, demanding money from, and otherwise threatening them.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 22, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

knowingly used and carried a firearm, that is, a loaded Ruger 9mm semi-automatic pistol, model P95, serial number 316-93431, black in color, and 11 rounds of ammunition, 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 interfered with interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraph 1 of Count Three of this indictment is incorporated here.
2. On or about February 23, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant BRUNSON unlawfully took and obtained cash from the Ed's Pizza House, located at 5022 Wayne Avenue, in Philadelphia, in the presence of employees of Ed's Pizza House and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of Ed's Pizza House, by pointing a firearm at, demanding money from, and otherwise threatening them.

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



**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 23, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRANDON BRUNSON**

knowingly used and carried a firearm, that is, a loaded Ruger 9mm semi-automatic pistol, model P95, serial number 316-93431, black in color, and 11 rounds of ammunition, 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 interfered with interstate commerce, 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

**BRANDON BRUNSON**

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


- (1) a Ruger 9mm semi-automatic pistol, model P95, serial number 316-93431, black in color, and 11 rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
United States Attorney