

**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>DAYON PINDER,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Bones"</b>	<b>:</b>	<b>18 U.S.C. § 1951(a) (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery - 5</b>
	<b>:</b>	<b>counts)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c) (carrying and</b>
	<b>:</b>	<b>using a firearm during and in relation to</b>
	<b>:</b>	<b>a crime of violence - 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times relevant to this indictment, the Dollar General Store, located at 333 Naamans Road in Claymont, Delaware ("the Dollar General Store"), was engaged in and affecting interstate commerce, providing goods and services that were produced and transported from other states to Delaware, to residents of the State of Delaware and out-of-state residents.

2. On or about March 13, 2010, in Claymont, in the District of Delaware, defendant

**DAYON PINDER,**  
**a/k/a "Bones,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PINDER unlawfully took and obtained, and aided and abetted and willfully caused the unlawful taking and obtaining of, United States currency from the Dollar General Store, from the person and in the presence of employees of the Dollar General Store, and against their will, by means of actual and threatened force, violence,

and fear of injury, immediate and future, to their person, that is, by brandishing a gun, demanding money, and threatening the employees of the Dollar General Store.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES:**

On or about March 13, 2010, in Claymont, in the District of Delaware, defendant

**DAYON PINDER,  
a/k/a "Bones,"**

knowingly used and carried, and aided and abetted and willfully caused the use and carrying of, a firearm 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 commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times relevant to this indictment, the BP Gas Station, located at 3421 Philadelphia Pike in Claymont, Delaware (“the BP Gas Station”), was engaged in and affecting interstate commerce, providing goods and services that were produced and transported from other states to Delaware, to residents of the State of Delaware and out-of-state residents.

2. On or about March 26, 2010, in Claymont, in the District of Delaware, defendant

**DAYON PINDER,  
a/k/a “Bones,”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PINDER unlawfully took and obtained, and aided and abetted and willfully caused the unlawful taking and obtaining of, United States currency from the BP Gas Station, from the person and in the presence of an employee of the BP Gas Station, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a gun, demanding money, and threatening the employee of the BP Gas Station.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES:**

On or about March 26, 2010, in Claymont, in the District of Delaware, defendant

**DAYON PINDER,  
a/k/a "Bones,"**

knowingly used and carried, and aided and abetted and willfully caused the use and carrying of, a firearm 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 commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times relevant to this indictment, the 7-Eleven Store, located at 1722 Naamans Road in Wilmington, Delaware (“the 7-Eleven Store”), was engaged in and affecting interstate commerce, providing food and beverages, and goods and services, that were produced and transported from other states to Delaware, to residents of the State of Delaware and out-of-state residents.

2. On or about March 29, 2010, in Wilmington, in the District of Delaware, defendant

**DAYON PINDER,  
a/k/a “Bones,”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PINDER unlawfully took and obtained, and aided and abetted and willfully caused the unlawful taking and obtaining of, United States currency from the 7-Eleven Store, from the person and in the presence of an employee of the 7-Eleven Store, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a gun, demanding money, and threatening the employee of the 7-Eleven Store.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES:**

On or about March 29, 2010, in Wilmington, in the District of Delaware, defendant

**DAYON PINDER,  
a/k/a "Bones,"**

knowingly used and carried, and aided and abetted and willfully caused the use and carrying of, a firearm 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 commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times relevant to this indictment, the LukOil Store, located at 443 Hannum Avenue in West Chester, Pennsylvania (“the LukOil Store”), was engaged in and affecting interstate commerce, providing food and beverages, and goods and services, that were produced and transported from other states to Pennsylvania, to residents of the Commonwealth of Pennsylvania and out-of-state residents.

2. On or about March 29, 2010, in West Chester, in the Eastern District of Pennsylvania, defendant

**DAYON PINDER,  
a/k/a “Bones,”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PINDER unlawfully took and obtained, and aided and abetted and willfully caused the unlawful taking and obtaining of, United States currency from the LukOil Store, from the person and in the presence of an employee of the LukOil Store, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a gun, demanding money, and threatening the employee of the LukOil Store.

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



**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES:**

On or about March 29, 2010, in West Chester, in the Eastern District of  
Pennsylvania, defendant

**DAYON PINDER,  
a/k/a "Bones,"**

knowingly used and carried, and aided and abetted and willfully caused the use and carrying of, a  
firearm 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 commerce by robbery, in violation of Title 18, United  
States Code, Sections 1951(a) and 2.

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

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times relevant to this indictment, the Sunoco A+ Store, located at 2850 West Chester Pike in Broomall, Pennsylvania (“the Sunoco A+ Store”), was engaged in and affecting interstate commerce, providing food and beverages, and goods and services, that were produced and transported from other states to Pennsylvania, to residents of the Commonwealth of Pennsylvania and out-of-state residents.

2. On or about March 30, 2010, in Broomall, in the Eastern District of Pennsylvania, defendant

**DAYON PINDER,  
a/k/a “Bones,”**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PINDER unlawfully took and obtained, and aided and abetted and willfully caused the unlawful taking and obtaining of, United States currency from the Sunoco A+ Store, from the person and in the presence of an employee of the Sunoco A+ Store, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, by claiming to have a gun, demanding money, and threatening to shoot the employee of the Sunoco A+ Store.

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

**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

**DAYON PINDER,  
a/k/a "Bones,"**


shall forfeit to the United States of America, the firearms and ammunition involved in the commission of these offenses.

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

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
**United States Attorney**