

- a. M.D. Pharmacy, located at 1641 N. Franklin Street;
- b. Pharmacy of America, located at 1500 E. Erie Avenue;
- c. Ellis Pharmacy, located at 2441 Brown Street;
- d. Germantown Pharmacy, located at 5100 Germantown Avenue; and
- e. Henneberry Pharmacy, located at 828 N. 24th Street.

The Conspiracy

2. From on or about February 8, 2010, through on or about May 25, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOHN BOWIE,
a/k/a “Heads,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

conspired and agreed, together and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, in that defendants DURAN, BROWN, BOWIE, HINES, and STATEN conspired to unlawfully take and obtain money, drugs, and other items of value from the person and presence of employees and customers of the businesses listed in paragraph 1, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, in violation of Title 18, United States Code, Sections 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN planned to rob pharmacies to obtain cash, prescription drugs, and controlled substances.

4. The armed robbers drove in various cars to the businesses and robbed the businesses at gunpoint.

5. During each robbery, at least two of the armed robbers brandished firearms, and demanded money and prescription drugs and controlled substances from the pharmacy.

6. During each robbery, the armed robbers stole United States currency and/or prescription drugs and controlled substances.

7. After each robbery, the robbers, along with other persons known and unknown to the grand jury, sold the stolen narcotics.

8. After each robbery, the robbers shared the proceeds from the robberies, including the proceeds from the sales of the drugs.

OVERT ACTS

In furtherance of the conspiracy, and to effect the object of the conspiracy, defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN, along with others both known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

The February 8, 2010 Armed Robbery of the M.D. Pharmacy

On or about February 8, 2010:

1. Defendant JOHN BOWIE, accompanied by others known and unknown to the grand jury, traveled to the M.D. Pharmacy, located at 1641 N. Franklin Street in Philadelphia, armed with handguns.

2. Defendant JOHN BOWIE and others known and unknown to the grand jury entered the M.D. Pharmacy, armed with handguns, and demanded money, controlled substances and other narcotics. The gunmen pointed guns at the pharmacist and demanded drugs. The robbers stole promethazine-codeine syrup, alprazolam and oxycodone, along with approximately \$3,000 cash from the pharmacy, and wallets, money, and other property from customers and employees before fleeing.

3. Following the robbery, defendant JOHN BOWIE and the other robbers shared the proceeds of the robbery.

The February 23, 2010 Armed Robbery of the M.D. Pharmacy

On or about February 23, 2010:

4. Defendant JOHN BOWIE, accompanied by others known and unknown to

the grand jury, traveled to the M.D. Pharmacy, located at 1641 N. Franklin Street in Philadelphia, armed with handguns.

5. Defendant JOHN BOWIE, and others known and unknown to the grand jury, entered the M.D. Pharmacy, armed with handguns and wearing masks, and demanded money, controlled substances, and other narcotics. During the robbery, the robbers ordered customers who were entering the store onto the floor. The robbers stole endocet tablets and other property before fleeing.

6. Following the robbery, defendant JOHN BOWIE and the other robbers shared the proceeds of the robbery.

The April 21, 2010 Armed Robbery of the Pharmacy of America

On or about April 21, 2010:

7. Defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN, accompanied by others known and unknown to the grand jury, drove in several cars to the Pharmacy of America, located at 1500 E. Erie Avenue in Philadelphia, armed with handguns.

8. Defendant KEVIN STATEN walked through the pharmacy and then exited, telling the other robbers how the pharmacy was arranged and where security cameras were located.

9. While defendant KEVIN STATEN waited in his vehicle, defendants EMMANUEL DURAN and JOHN BOWIE, along with another robber, entered the Pharmacy of America, each armed with a handgun. Defendant BOWIE was disguised in woman's Muslim garb.

10. Defendants EMMANUEL DURAN and JOHN BOWIE and a third robber demanded cash, prescription drugs, and controlled substances and stole approximately \$5,000 in United States currency from the pharmacist. The robbers forced the employees onto the floor, including a woman who was six months pregnant. When this employee tried to get up, one of the robbers pushed her down. Defendants DURAN and BOWIE and the third robber stole a total of approximately \$19,000 in cash, prescription drugs, and controlled substances including oxycontin, endocet, roxidet, oxyir, percocet, and, phenergan with codeine, and then fled from the store.

11. Defendants EMMANUEL DURAN, JOHN BOWIE, KEVIN STATEN, and the other conspirators, drove away from the pharmacy in several cars.

12. After the robbery, defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN, and the other conspirators drove to the home of Person #1, who helped divide and sell the stolen narcotics.

13. Defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN and others distributed the stolen narcotics, shared in the proceeds from the narcotics sales, and shared the proceeds from the armed robbery.

The April 29, 2010 Armed Robbery of the Ellis Pharmacy

On or about April 29, 2010:

14. Defendants JOHN BOWIE and KEVIN STATEN and other robbers drove in several cars to the Ellis Pharmacy, located at 2441 Brown Street in Philadelphia, armed with handguns.

15. Defendant KEVIN STATEN walked through the pharmacy and then

exited, telling the other robbers how the pharmacy was arranged and where security cameras were located.

16. While defendant KEVIN STATEN and another robber waited in cars near the pharmacy, defendant JOHN BOWIE and two other robbers entered the pharmacy armed with handguns and demanded cash, prescription drugs, and controlled substances. Defendant BOWIE and the two other robbers stole narcotics and prescription drugs including: morphine sulfate, acetaminophen-codeine tablets, oxycodone, promethazine codeine syrup, hydrocodone homatropine syrup, duragesic patches, tylox, tussionex pennkinetic suspension, oxycontin, and avinza, plus \$880 in postage stamps, and cash, totaling more than \$13,000 in currency, property and narcotics, before fleeing the pharmacy.

17. Defendant JOHN BOWIE and one of the other robbers fired their handguns, including a Glock Model 27, .40 S&W caliber, serial number KZZ043, and a Smith & Wesson Model "Lady Smith" .38 caliber revolver, serial number BDV1577, in the direction of victims and witnesses, while fleeing from the pharmacy. Defendant BOWIE and some robbers drove away in one car, and then transferred to cars driven by defendant KEVIN STATEN and another conspirator and fled the area.

18. After the robbery, defendants JOHN BOWIE and KEVIN STATEN, and the other robbers, drove to the home of Person #1, who helped divide and sell the stolen narcotics.

19. Defendants JOHN BOWIE and KEVIN STATEN and the other robbers distributed the stolen narcotics, shared in the proceeds from the narcotics sales, and shared the proceeds from the armed robbery.

The May 7, 2010 Armed Robbery of the Germantown Pharmacy

20. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES, and KEVIN STATEN drove in several cars to the Germantown Pharmacy, located at 5100 Germantown Avenue in Philadelphia, armed with handguns. Two of the cars utilized were a white Malibu and a green Taurus station wagon previously purchased by defendant DURAN, but registered in the name of another person, and a 1999 green Dodge Caravan, driven by defendant STATEN.

21. Defendant KEVIN STATEN walked through the pharmacy and then exited, telling the other robbers how the pharmacy was arranged and where security cameras were located.

22. While defendant KEVIN STATEN waited in the green 1999 Dodge Caravan, defendants EMMANUEL DURAN, RAHEEM BROWN, and JOSHUA HINES entered the pharmacy armed with handguns and demanded cash, prescription drugs, and controlled substances. Defendants DURAN, BROWN and HINES stole more than \$7,000 in currency, controlled substances, and prescription medications including: oxycodone, promethazine-codeine syrup, promethazine VC-codeine syrup, oxycontin, and, endocet, \$330 worth of Septa passes, a cell phone before fleeing the pharmacy.

23. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES, and KEVIN STATEN drove away in the getaway vehicles.

24. After the robbery, defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES, and KEVIN STATEN drove to the home of Person #1, who helped divide and sell the stolen narcotics. Defendant STATEN drove another person, known to the

grand jury, who took the stolen oxycontin pills and sold them to Person #2, known to the grand jury (Person # 2).

25. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES, and KEVIN STATEN distributed the stolen narcotics, shared in the proceeds from the narcotics sales, and shared the proceeds from the armed robbery.

The May 25, 2010 Armed Robbery of the Henneberry Pharmacy

On or about May 25, 2010:

26. Defendants JOHN BOWIE and KEVIN STATEN and another robber drove to the Henneberry Pharmacy, located 838 N. 24th Street in Philadelphia, armed with handguns.

27. Defendant KEVIN STATEN walked through the pharmacy and then exited, telling the other robbers how the pharmacy was arranged and where security cameras were located.

28. Defendants JOHN BOWIE and KEVIN STATEN and another robber entered the pharmacy armed with handguns and demanded cash, prescription drugs, and controlled substances. Defendants BOWIE and STATEN and another robber stole controlled substances and prescription drugs including: oxycodone, promethazine codeine syrup, alprazolam, oxycontin, and endocet, plus approximately \$9,000 in cash from the store, as well as from an employee and a customer before fleeing the pharmacy.

29. After the robbery, defendants JOHN BOWIE and KEVIN STATEN and another robber drove to the home of Person #1, who helped divide and sell the stolen narcotics. Defendants BOWIE and STATEN took the stolen oxycontin pills and sold them to Person #2.

30. Defendants JOHN BOWIE and KEVIN STATEN and another robber distributed the stolen narcotics, shared in the proceeds from the narcotics sales, and shared the proceeds from the armed robbery.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 8, and Overt Acts 1 through 30 of Count One of this indictment are incorporated here.
2. From at least on or about February 3, 2010, through on or about May 25, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOHN BOWIE,
a/k/a “Heads,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute oxycodone, oxycontin, percocet, endocet, each Schedule II controlled substances, alprazolam, a Schedule IV controlled substance, and promethazine-codeine syrup, a Schedule V controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

3. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN, and others known and unknown to the grand jury, committed armed robberies of pharmacies in Philadelphia, Pennsylvania, in which they stole a variety of narcotics and controlled substances, including but not limited to, oxycodone,

oxycontin, percocet, endocet, promethazine-codeine syrup, and alprazolam.

4. After each robbery, defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN, along with others, distributed and sold the stolen narcotics, and shared in the proceeds of those illegal drug sales.

5. After the robberies, defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN, along with others, went to the homes of other persons, including Person #1, who assisted in dividing and selling the narcotics.

6. The stolen narcotics, which were distributed by defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN and others, were as follows:

a. On February 2, 2010, from the M.D. Pharmacy, promethazine-codeine syrup, alprazolam and oxycodone;

b. On February 23, 2010, from the M.D. Pharmacy, endocet tablets;

c. On April 21, 2010, from the Pharmacy of America, oxycontin, endocet, roxidet, oxyir, percocet, and, phenergan with codeine;

d. On April 29, 2010, from the Ellis Pharmacy, morphine sulfate, acetaminophen-codeine tablets, oxycodone, promethazine codeine syrup, hydrocodone homatropine syrup, duragesic patches, tylox, tussionex pennkinetic suspension, oxycontin, and avinza;

e. On May 7, 2010, from the Germantown Pharmacy, oxycodone, promethazine-codeine syrup, promethazine VC-codeine syrup, oxycontin, and endocet;

f. On May 25, 2010, from the Henneberry Pharmacy, oxycodone, promethazine codeine syrup, alprazolam, oxycontin, and endocet.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objectives, defendants EMMANUEL DURAN, RAHEEM BROWN, JOHN BOWIE, JOSHUA HINES, and KEVIN STATEN, and others known and unknown to the grand jury, committed the overt acts fully set forth in Count One of this indictment, Overt Acts 1 through 30, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about February 3, 2010, defendant JOHN BOWIE and others stole narcotics from the M.D. Pharmacy during an armed robbery. Following the robbery, defendant BOWIE and others distributed the narcotics and shared in the proceeds.

2. On or about February 23, 2010, defendant JOHN BOWIE and others stole narcotics from the M.D. Pharmacy during an armed robbery. Following the robbery, defendant BOWIE and others distributed the narcotics and shared in the proceeds.

On or about April 21, 2010:

3. Defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN and another robber stole narcotics from the Pharmacy of America during an armed robbery.

4. Following the robbery, defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN and another robber distributed the narcotics and shared in the proceeds.

On or about April 29, 2010:

5. Defendants JOHN BOWIE and KEVIN STATEN and other robbers stole

narcotics from the Ellis Pharmacy during an armed robbery.

6. Following the robbery, defendants JOHN BOWIE and KEVIN STATEN and other robbers distributed the narcotics and shared in the proceeds.

On or about May 7, 2010:

7. Defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES and KEVIN STATEN stole narcotics from the Germantown Pharmacy during an armed robbery.

8. Following the robbery, defendants EMMANUEL DURAN, RAHEEM BROWN, JOSHUA HINES and KEVIN STATEN distributed the narcotics and shared in the proceeds.

On or about May 25, 2010:

9. Defendants JOHN BOWIE and KEVIN STATEN and another robber stole narcotics from the Henneberry Pharmacy during an armed robbery.

10. Following the robbery, defendants JOHN BOWIE and KEVIN STATEN and another robber distributed the narcotics and shared in the proceeds.

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.a. and 3 through 8, and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.
2. On or about February 8, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendant

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant BOWIE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and prescription drugs belonging to the M.D. Pharmacy, located at 1641 N. Franklin Street, Philadelphia, Pennsylvania, in the presence of employees and customers of that 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 brandishing handguns, demanding money and drugs, and threatening the employees and customers of the M.D. Pharmacy.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.a. and 3 through 8, and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.
2. On or about February 8, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendant

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted 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, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951 and 2.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN BOWIE,
a/k/a "Heads,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Glock Model 27, .40 S&W caliber, serial number KZZ043.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.
2. On or about February 8, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, controlled substances, including but not limited to, promethazine-codeine syrup, a Schedule V controlled substance, alprazolam, a Schedule IV controlled substance, and oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.a. and 3 through 8, and Overt Acts 4 through 6 of Count One of this indictment are incorporated here.

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

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant BOWIE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and prescription drugs belonging to the M.D. Pharmacy, located at 1641 N. Franklin Street, Philadelphia, Pennsylvania, in the presence of employees and customers of that 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 brandishing a handgun, demanding money and drugs, and threatening the employees and customers of the M.D. Pharmacy.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.a. and 3 through 8, and Overt Acts 4 through 6 of Count One of this indictment are incorporated here.

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

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted 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, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951 and 2.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

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

**JOHN BOWIE,
a/k/a "Heads,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Glock Model 27, .40 S&W caliber, serial number KZZ043.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.

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

**JOHN BOWIE,
a/k/a "Heads,"**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, controlled substances, including but not limited to, endocet, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.b. and 3 through 8, and Overt Acts 7 through 13 of Count One of this indictment are incorporated here.

2. On or about April 21, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

EMMANUEL DURAN
a/k/a “Manny”
a/k/a “Manny Yunk”
JOHN BOWIE
a/k/a “Heads” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants EMMANUEL DURAN, JOHN BOWIE, and KEVIN STATEN unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and prescription drugs belonging to Pharmacy of America, located at 1500 East Erie Avenue, Philadelphia, Pennsylvania, in the presence of employees of that 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 brandishing handguns, demanding money and threatening the employees of Pharmacy of America.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.b. and 3 through 8, and Overt Acts 7 through 13 of Count One of this indictment are incorporated here.
2. On or about April 21, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN
a/k/a “Manny”
a/k/a “Manny Yunk”
JOHN BOWIE
a/k/a “Heads” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, 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 THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.
2. On or about April 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of oxycontin, oxycodone, percocet, and endocet, each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.c. and 3 through 8, and Overt Acts 14 through 19 of Count One of this indictment are incorporated here.

2. On or about April 29, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants BOWIE and STATEN unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money, prescription drugs and other property belonging to Ellis Pharmacy, located at 2441 Brown Street in Philadelphia, in the presence of employees of that 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 brandishing and firing handguns, demanding money and threatening the employees of Ellis Pharmacy.

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

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.c. and 3 through 8, and Overt Acts 14 through 19 of Count One of this indictment are incorporated here.

2. On or about April 29, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Glock Model 27, .40 S&W caliber, serial number KZZ043, a Smith & Wesson Model “Lady Smith” .38 caliber revolver, serial number BDV1577, and others, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, 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 SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm that is, a Glock Model 27, .40 S&W caliber, serial number KZZ043, and a Smith & Wesson Model “Lady Smith” .38 caliber revolver, serial number BDV1577.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.
2. On or about April 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of oxycodone and oxycontin, each a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.d. and 3 through 8, and Overt Acts 20 through 25 of Count One of this indictment are incorporated here.

2. On or about May 7, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants DURAN, BROWN, HINES and STATEN unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money, prescription drugs and other property belonging to Germantown Pharmacy, located at 5100 Germantown Avenue in Philadelphia, in the presence of employees of that 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 brandishing handguns, demanding money and threatening the employees of Germantown Pharmacy.

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

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.d. and 3 through 8, and Overt Acts 20 through 25 of Count One of this indictment are incorporated here.

2. On or about May 7, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, 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 TWENTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 7, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.
2. On or about May 7, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of oxycodone, oxycontin and endocet, each a Schedule II controlled substance, and promethazine-codeine syrup, a Schedule V controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.e. and 3 through 8, and Overt Acts 26 through 30 of Count One of this indictment are incorporated here.

2. On or about May 25, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants BOWIE and STATEN unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and narcotics belonging to Henneberry Pharmacy, located at 828 North 24th Street in Philadelphia, in the presence of employees of that 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 brandishing handguns, demanding money, and threatening the employees of Henneberry Pharmacy.

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

COUNT TWENTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.e. and 3 through 8, and Overt Acts 26 through 30 of Count One of this indictment are incorporated here.

2. On or about May 25, 2010, in Philadelphia, the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, 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 TWENTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Glock Model 27, .40 S&W caliber, serial number KZZ043, and a Smith & Wesson Model “Lady Smith” .38 caliber revolver, serial number BDV1577.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 6 of Count Two of this indictment are incorporated here.
2. On or about May 25, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOHN BOWIE,
a/k/a “Heads,” and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of oxycodone, oxycontin and endocet, each a Schedule II controlled substance, alprazolam, a Schedule IV controlled substance, and promethazine-codeine syrup, a Schedule V controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Heckler and Koch, .40 caliber semi-automatic handgun, serial number 26045373, loaded with 9 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN BOWIE,
a/k/a “Heads,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Glock, Model 27, .40 S&W caliber, serial number KZZ043, loaded with 13 live rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT TWENTY NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JOSHUA HINES,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Smith & Wesson Model “Lady Smith” .38 caliber revolver, serial number BDV1577, loaded with 4 live rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), as charged in this indictment, defendants

**EMMANUEL DURAN,
a/k/a “Manny,”
a/k/a “Manny Yunk,”
RAHEEM BROWN,
a/k/a “Heem,”
JOHN BOWIE,
a/k/a “Heads,”
JOSHUA HINES, and
KEVIN STATEN,
a/k/a “Donnell Staten,”
a/k/a “Nell”**

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

1. Glock Model 27, .40 S&W caliber, serial number KZZ043, and 9 live rounds of ammunition;
2. Smith & Wesson Model “Lady Smith” .38 caliber revolver, serial number BDV1577, and 13 live rounds of ammunition;
3. Heckler and Koch, .40 caliber semi-automatic handgun, serial number 26045373, and 9 live rounds of ammunition;

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