

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
HAKEEM PARIS : **VIOLATIONS:**
: **18 U.S.C. § 1951(a) (conspiracy to**
: **commit robbery which interfered**
: **with interstate commerce - 1 count)**
: **18 U.S.C. § 1951(a) (robbery which**
: **interfered with interstate commerce**
: **- 1 count)**
: **18 U.S.C. § 1951(a) (attempted robbery**
: **which interfered with interstate**
: **commerce - 1 count)**
: **18 U.S.C. § 924(c)(1) (carrying and using**
: **a firearm during a crime of violence**
: **- 2 counts)**
: **18 U.S.C. § 922(g)(1)**
: **(convicted felon in possession of a firearm**
: **- 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Bridesburg Pizza, located at 4776 Richmond Street in Philadelphia, Pennsylvania, was a business engaged in interstate commerce, providing food, beverages and packaged goods produced in and transported from other states to the Commonwealth of Pennsylvania, for sale to residents of the Commonwealth of Pennsylvania and out of state residents.

2. The Wawa convenience store located at 4371 Richmond Street in

Philadelphia, Pennsylvania, was a business engaged in interstate commerce, providing food, beverages, cigarettes, and packaged goods produced in and transported from other states to the Commonwealth of Pennsylvania, for sale to residents of the Commonwealth of Pennsylvania and out of state residents.

THE ROBBERY CONSPIRACY

3. From on or about May 11, 2010, to on or about May 23, 2010, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

HAKEEM PARIS

conspired and agreed with at least one other person, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendant PARIS, and others known and unknown to the grand jury, conspired to unlawfully take and obtain money and other items of value from the owner and employees of Bridesburg Pizza and Wawa, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

4. It was part of this conspiracy that defendant HAKEEM PARIS and other individuals known and unknown to the grand jury planned and executed an armed robbery of Bridesburg Pizza, and planned to execute an armed robbery of the Wawa convenience store, by driving to the business establishments, entering the establishments with a firearm when the owner and employees were present inside, and forcing them to give defendant PARIS cash by threatening to use, and actually using, physical violence, to take money, other property and

business proceeds that were in the owner's and employees' possession.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant HAKEEM PARIS, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about May 10, 2010:

1. Defendant HAKEEM PARIS entered Bridesburg Pizza, located at 4776 Richmond Street in Philadelphia, Pennsylvania, at approximately 8:00 p.m. while wearing a multi-colored knit hat, fake dreadlocks, and sunglasses, and carrying a silver-colored semi-automatic pistol.

2. Defendant HAKEEM PARIS approached the owner and employees of Bridesburg Pizza, pointed a silver-colored semi-automatic pistol at them, demanded that they give him the business proceeds, took approximately \$336 in U.S. currency from the owner, and forced the owner and employees to the back of the store at gunpoint before fleeing.

3. Defendant HAKEEM PARIS took the proceeds of the robbery, fled on foot from Bridesburg Pizza, and jumped into the passenger side of a dark colored automobile waiting outside Bridesburg Pizza, and left the area in the automobile driven by a male unknown to the grand jury.

On or about May 23, 2010:

4. Defendant HAKEEM PARIS entered the Wawa convenience store located at 4776 Richmond Street in Philadelphia, Pennsylvania, at approximately 1:50 a.m., while wearing a multi-colored knit hat, fake dreadlocks, and sunglasses, and carrying a silver-

colored semi-automatic pistol.

5. Defendant HAKEEM PARIS fled on foot from the Wawa convenience store, entered the passenger side of a dark colored automobile, and left the area in the automobile driven by a male known to the grand jury.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.

2. On or about May 10, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAKEEM PARIS

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PARIS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$336 in United States Currency from the owner and employees of Bridesburg Pizza, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their persons, that is, by pointing a firearm at the owner and employees, and demanding money from, and otherwise assaulting and threatening, them.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 10, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAKEEM PARIS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a silver colored semi-automatic pistol, 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 robbery which interfered with interstate commerce, and robbery which interfered 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 FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 2 and Overt Acts 4 and 5 of Count One of this indictment are incorporated here.

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

HAKEEM PARIS

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant PARIS attempted to unlawfully take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, United States Currency from the Wawa convenience store at 4371 Richmond Street in Philadelphia, Pennsylvania, in the presence of employees and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees, by entering the Wawa convenience store while wearing a disguise, to include a knit cap, a dreadlocks wig, and dark sunglasses, and carrying a loaded firearm.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

HAKEEM PARIS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, a Jennings Nine, 9mm semi-automatic pistol, with an obliterated serial number, loaded with ten 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, conspiracy to commit robbery which interfered with interstate commerce, and attempted robbery which interfered 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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

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

HAKEEM PARIS,

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 Jennings Nine, 9mm semi-automatic pistol, with an obliterated serial number, and loaded with ten rounds of ammunition.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c) and 922(g)(1), set forth in this indictment, defendant

HAKEEM PARIS

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

- (1) a Jennings Nine, 9 mm semi-automatic pistol, with an obliterated serial number, and
- (2) ten 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:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY