

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-489</u>
v.	:	DATE FILED: <u>April 28, 2011</u>
KAREEM WATSON, a/k/a "Snipes,"	:	VIOLATIONS:
AARON SMITH, a/k/a "A-Dub"	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 1951 (robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 924(c)(1) (using and carrying a firearm during and in relation to a crime of violence - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting) Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times material to this indictment:

1. The Fox & Hound Smokehouse & Tavern ("the Fox & Hound Tavern"), located at 1501 Spruce Street in Philadelphia, Pennsylvania, was a business engaged in interstate commerce, providing food and beverages produced in and transported from other states to the Commonwealth of Pennsylvania, and sold to residents of the Commonwealth of Pennsylvania and out of state residents.

2. From in or about March 2008, through in or about July 2008, defendant KAREEM WATSON was an employee of the Fox & Hound Tavern.

THE ROBBERY CONSPIRACY

3. On or about October 27, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KAREEM WATSON,
a/k/a “Snipes,” and
AARON SMITH,
a/k/a “A-Dub”**

conspired and agreed, with Omar Kareem Hopkins charged elsewhere, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants WATSON and SMITH, along with Hopkins, conspired to unlawfully take and obtain money and other things of value from the Fox & Hound Tavern and from its employees and others and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of this conspiracy that:

4. Defendants KAREEM WATSON and AARON SMITH, and Omar Kareem Hopkins planned to rob the Fox & Hound Tavern at gunpoint.

5. Because defendant KAREEM WATSON was a former employee of the Fox & Hound Tavern, he was able to provide and did provide specific information to defendant AARON SMITH and Omar Kareem Hopkins about the interior of the tavern and, specifically, the location of a safe within the office.

6. Because defendant KAREEM WATSON was a former employee of the Fox & Hound Tavern, and would therefore be recognized, it was agreed that defendant AARON SMITH and Omar Kareem Hopkins would enter the premises and commit the robbery, while defendant WATSON remained outside as a lookout.

OVERT ACTS

In furtherance of this conspiracy and to accomplish its object, in the Eastern District of Pennsylvania, defendants KAREEM WATSON and AARON SMITH, and Omar Kareem Smith, charged elsewhere, committed the following overt acts, among others, on or about October 27, 2008:

1. Defendants KAREEM WATSON and AARON SMITH, and Omar Kareem Hopkins, drove together to the Fox & Hound Tavern.
2. Defendant KAREEM WATSON remained outside the business as the lookout, while defendant AARON SMITH and Omar Kareem Hopkins entered the business, spoke with the manager, and posed as job applicants.
3. Omar Kareem Hopkins abruptly announced that “this is a robbery” and placed a semiautomatic pistol in the manager’s back. Defendant AARON SMITH and Hopkins then forced the manager and other employees into the manager’s office, at gunpoint, and ordered the manager to open the safe. The manager then handed over two bags containing approximately \$29,000 in cash.
4. Defendant AARON SMITH bound the employees at the wrists and ankles with duct tape and then fled the business with the stolen cash. Defendant SMITH and Omar Kareem Watson entered the awaiting getaway vehicle along with defendant KAREEM

WATSON.

5. Defendants KAREEM WATSON and AARON SMITH, and Omar Kareem Hopkins, subsequently met and divided the proceeds of the armed robbery between them.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2, and 4 through 6, and Overt Acts 1 through 5 of Count One of this indictment are incorporated here.

2. On or about October 27, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KAREEM WATSON,
a/k/a "Snipes," and
AARON SMITH,
a/k/a "A-Dub"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants WATSON and SMITH, and Omar Kareem Hopkins, charged elsewhere, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and other things of value from the Fox & Hound Smokehouse & Tavern and from its employees and others, that is, approximately \$24,900, from the employees of the Fox & Hound Smokehouse & Tavern and others, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, by brandishing a firearm at the employees, forcing the employees onto the floor, demanding money, and restraining them with duct tape.

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

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 27, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KAREEM WATSON,
a/k/a "Snipes," and
AARON SMITH,
a/k/a "A-Dub"**

used and carried, and aided and abetted the use and carrying of, a firearm, that is, a black semi-automatic CZ (CESKA ZBROJOVKA) 40.P, 40 caliber handgun, serial number RA0036, loaded with five rounds of ammunition, during and in relation to a crime of violence for which each 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 and 2.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

**KAREEM WATSON,
a/k/a "Snipes," and
AARON SMITH,
a/k/a "A-Dub"**

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

-a black semi-automatic CZ (CESKA ZBROJOVKA) 40.P, 40 caliber handgun, serial number RA0036, loaded with five 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 MEMENGER
United States Attorney