

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
TERRANCE MORRIS,	:	VIOLATIONS:
a/k/a “Jay,”	:	18 U.S.C. § 1951 (conspiracy to commit
ROBERT LLOYD	:	robbery which interferes with interstate
CALVIN HARRIS	:	commerce - 1 count)
	:	18 U.S.C. § 1951 (robbery which
	:	interferes with interstate commerce - 4
	:	counts)
	:	18 U.S.C. § 924(c) (using and carrying a
	:	firearm during a crime of violence - 4
	:	counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Dunkin Donuts stores, located at 221 W. Hunting Park Avenue, 5901 Rising Sun Avenue, 813 Adams Avenue, and 5401 N. 5th Street, all in Philadelphia, in the Eastern District of Pennsylvania, were businesses engaged in interstate commerce, selling food, beverages, and packaged goods, containing components produced in and transported from other states to the Commonwealth of Pennsylvania, to residents of the Commonwealth of Pennsylvania and out of state residents.

THE ROBBERY CONSPIRACY

2. From on or about November 25, 2010, through on or about November 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

TERRANCE MORRIS and ROBERT LLOYD

conspired and agreed to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants MORRIS and LLOYD conspired to unlawfully take and obtain money and other things of value from Dunkin Donuts stores and from their employees, and 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

3. It was part of the conspiracy that defendants TERRANCE MORRIS and ROBERT LLOYD planned and executed armed robberies of Dunkin Donuts stores by driving to the Dunkin Donuts stores and using a firearm to steal United States currency that was the business proceeds of Dunkin Donuts stores.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants TERRANCE MORRIS and ROBERT LLOYD committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

November 25, 2010 Robbery of Dunkin Donuts, 221 West Hunting Park Avenue

On or about November 25, 2010:

1. Defendant TERRANCE MORRIS, armed with a firearm, and defendant ROBERT LLOYD drove in a black Jeep Rubicon to the Dunkin Donuts store located at 221 West Hunting Park Avenue, in Philadelphia.

2. At approximately 4:26 p.m., defendants TERRANCE MORRIS and ROBERT LLOYD, both wearing hoodies to hide their faces, entered the Dunkin Donuts store.

3. Once inside the store, defendant TERRANCE MORRIS brandished a firearm, threatened to shoot an employee ("Person #1," known to the grand jury), and demanded that Person #1 fill a bag with money. Defendant ROBERT LLOYD handed Person #1 a bag, and Person #1 took money out of the cash register, placed it in the bag, and gave the bag back to defendants MORRIS and LLOYD.

4. After taking approximately \$178 in United States currency from Person #1, defendants TERRANCE MORRIS and ROBERT LLOYD fled from the store with cash that was the business proceeds of the Dunkin Donuts store.

November 25, 2010 Robbery of Dunkin Donuts, 5901 Rising Sun Avenue

On or about November 25, 2010:

5. Defendant TERRANCE MORRIS, armed with a firearm, and defendant ROBERT LLOYD drove in a black Jeep Rubicon to the Dunkin Donuts store located at 5901 Rising Sun Avenue, in Philadelphia.

6. At approximately 4:36 p.m., defendants TERRANCE MORRIS and ROBERT LLOYD, both wearing hoodies to hide their faces, entered the Dunkin Donuts store.

7. Once inside the store, defendant TERRANCE MORRIS brandished a firearm, threatened to shoot an employee (“Person #2,” known to the grand jury), and demanded that Person #2 fill a bag with money. Defendant ROBERT LLOYD handed Person #2 a bag, and Person #2 took money out of the cash register, placed it in the bag, and gave the bag back to defendants MORRIS and LLOYD.

8. After taking approximately \$393 in United States currency from Person #2, defendants TERRANCE MORRIS and ROBERT LLOYD fled from the store with cash that was the business proceeds of the Dunkin Donuts store.

November 30, 2010 Robbery of Dunkin Donuts, 813 Adams Avenue

On or about November 30, 2010:

9. Defendant TERRENCE MORRIS, armed with a firearm, and defendants ROBERT LLOYD and CALVIN HARRIS drove in a black Jeep Rubicon to the Dunkin Donuts store located at 813 Adams Avenue, in Philadelphia. Defendant CALVIN HARRIS remained in the getaway vehicle to act as a lookout.

10. At approximately 4:02 p.m., defendant ROBERT LLOYD entered the Dunkin Donuts store, posed as a customer, and ordered donuts from an employee (“Person #3,” known to the grand jury).

11. After Person #3 took cash from defendant ROBERT LLOYD and opened the cash register, defendant TERRANCE MORRIS, who wore a hoodie to hide his face, entered the store.

12. Once inside the store, defendant TERRANCE MORRIS brandished a firearm and demanded that Person #3 fill a bag with money. Defendant MORRIS handed Person #3 a bag,

and Person #3 took money out of the cash register, placed it in the bag, and gave the bag back to defendant MORRIS.

13. After taking approximately \$300 in United States currency from the cash register located in the store, defendant TERRANCE MORRIS fled from the store with cash that was the business proceeds of the Dunkin Donuts store.

14. In an attempt to appear as if he were not involved in the robbery, defendant ROBERT LLOYD asked "Person #3" whether he wanted to call "911." Defendant LLOYD then left the store.

November 30, 2010, Robbery of Dunkin Donuts, 5401 North 5th Street

On or about November 30, 2010:

15. Defendants TERRENCE MORRIS, ROBERT LLOYD, and CALVIN HARRIS prepared to rob the Dunkin Donuts store located at 5401 N. 5th Street, in Philadelphia.

16. Defendant TERRANCE MORRIS, armed with a firearm, and defendants ROBERT LLOYD and CALVIN HARRIS drove in a black Jeep Rubicon to the Dunkin Donuts store located at 5401 N. 5th Street. Defendant LLOYD remained in the getaway vehicle and acted as a lookout.

17. At approximately 4:40 p.m., defendant CALVIN HARRIS entered the Dunkin Donuts store, posed as a customer, and ordered donuts from an employee ("Person #4," known to the grand jury).

18. After Person #4 took cash from defendant CALVIN HARRIS and opened the cash register, defendant TERRANCE MORRIS, who wore a hoodie to hide his face, entered the store.

19. Once inside the store, defendant TERRANCE MORRIS brandished a firearm, demanded that Person #4 fill a bag with money, and threatened to shoot Person #4. Defendant MORRIS handed Person #4 a bag, and Person #4 took money out of the cash register, placed it in the bag, and gave the bag back to defendant MORRIS.

20. After taking approximately \$156 in United States currency from Person #4, defendant TERRANCE MORRIS fled from the store with cash that was the business proceeds of the Dunkin Donuts store.

21. Defendant CALVIN HARRIS waited for "Person #4" to give him the donuts he had ordered, and then left the store.

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 and Overt Acts 1 through 4 of Count One of this indictment are incorporated here.

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

TERRANCE MORRIS and ROBERT LLOYD

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so by robbery, in that, defendants MORRIS and LLOYD unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$178 in United States currency from an employee of the Dunkin Donuts store, located at 221 West Hunting Park Avenue, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property in his possession, that is, by brandishing a firearm, demanding money, and threatening the employee.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

**TERRANCE MORRIS and
ROBERT LLOYD**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which each defendant 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, Section 1951(a).

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

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

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

**TERRANCE MORRIS and
ROBERT LLOYD**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants MORRIS and LLOYD unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$393 in United States currency from an employee of the Dunkin Donuts store, located at 5901 Rising Sun Avenue, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property in his possession, that is, by brandishing a firearm, demanding money, and threatening the employee.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

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

**TERRANCE MORRIS and
ROBERT LLOYD**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which each defendant 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, Section 1951(a).

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 and Overt Acts 9 through 14 of Count One of this indictment are incorporated here.

2. On or about November 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**TERRANCE MORRIS,
ROBERT LLOYD, and
CALVIN HARRIS**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and did so by robbery, in that, defendants MORRIS, LLOYD, and HARRIS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$300 in United States currency from an employee of the Dunkin Donuts store, located at 813 Adams Avenue, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property in his possession, that is, by brandishing a firearm, demanding money, and threatening the employee.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**TERRANCE MORRIS,
ROBERT LLOYD, and
CALVIN HARRIS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which each defendant 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, Section 1951(a).

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 and Overt Acts 15 through 21 of Count One of this indictment are incorporated here.
2. On or about November 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**TERRANCE MORRIS,
ROBERT LLOYD, and
CALVIN HARRIS**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and did so by robbery, in that, defendants MORRIS, LLOYD, and HARRIS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$156 in United States currency from employees of the Dunkin Donuts store, located at 5401 N. 5th Street, and 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, that is, by brandishing a firearm, demanding money, and threatening one of the employees.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**TERRANCE MORRIS,
ROBERT LLOYD, and
CALVIN HARRIS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which each defendant 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, Section 1951(a).

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

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**