

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** 10-_____
v. : **DATE FILED:** July , 2010
KAREEM WATSON, : **VIOLATIONS:**
a/k/a "Snipes" : **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**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times material to this indictment:

1. The Fox & Hound Smokehouse & Tavern (The Fox and Hound Tavern), located at 1501 Spruce Street in Philadelphia, Pennsylvania, was engaged in interstate commerce.
2. From in or about March 2008, through in or about July 2008, defendant KAREEM WATSON was an employee of the Fox & Hound Smokehouse & Tavern.

HE ROBBERY CONSPIRACY

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

**KAREEM WATSON,
a/k/a “Snipes,”**

conspired and agreed, with Omar Kareem Hopkins charged elsewhere, and a person known to the grand jury as “A-Dub,” to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendant WATSON, along with Hopkins and “A-Dub,” conspired to unlawfully take and obtain property, including money, from person and presence of employees of the Fox & Hound Smokehouse & Tavern and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees and their property, 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. Defendant KAREEM WATSON, Omar Kareem Hopkins, and “A-Dub” planned to rob the Fox & Hound Tavern at gunpoint.

5. Because defendant KAREEM WATSON had been a former employee of the Fox & Hound Tavern, he was able to provide and did provide specific information to Omar Kareem Hopkins, and “A-Dub” about the interior of the tavern, and, specifically, that the safe was located inside the office.

6. Defendant KAREEM WATSON, Omar Kareem Hopkins, and “A-Dub” drove together to the business, where defendant WATSON remained outside as a lookout; and

7. Omar Kareem Hopkins and “A-Dub” then entered the business at gunpoint, threatened and intimidated the employees inside the business by pointing the gun at them, ordered them onto the floor, demanded money, stole cash, bound the employees at their wrists and ankles with duct tape, and fled.

OVERT ACTS

In furtherance of this conspiracy, in the Eastern District of Pennsylvania, defendant KAREEM WATSON, and others known and unknown to the grand jury, committed the following overt acts, among others, on or about October 27, 2008:

1. Defendant KAREEM WATSON, Omar Kareem Hopkins, and “A-Dub” drove together to the Fox & Hound Smokehouse and Tavern.
2. Defendant KAREEM WATSON remained outside the business as the lookout, while Omar Kareem Hopkins and “A-Dub” entered the business, spoke with the manager, and appeared to act as job applicants.
3. Omar Kareem Hopkins abruptly announced that “this is a robbery” and placed a semiautomatic pistol in the manager’s back. Hopkins and “A-Dub” 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. Omar Kareem Hopkins and “A-Dub” bound the employees at the wrists and ankles with duct tape and then fled the business with the stolen cash and entered the awaiting getaway vehicle along with defendant KAREEM WATSON.
5. Defendant KAREEM WATSON, Omar Kareem Hopkins, and “A-Dub” 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 7, 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, defendant

**KAREEM WATSON,
a/k/a "Snipes,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendant WATSON, and Omar Kareem Hopkins, charged elsewhere, and a person known to the grand jury as "A-Dub," unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money from the person and presence of employees of the business, that is, approximately \$24,900, from the employees of the Fox & Hound Smokehouse and Tavern, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, by brandishing a firearm at the employees, forcing the employees onto the floor, demanding money, and restraining them.

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

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 4 through 7, 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, defendant

**KAREEM WATSON,
a/k/a "Snipes,"**

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 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 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, defendant

**KAREEM WATSON,
a/k/a "Snipes,"**

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