

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: <u>May 12, 2011</u>
ANTHONY BURNETT,	:	VIOLATIONS:
 a/k/a "Ant,"	:	18 U.S.C. § 1951 (conspiracy to commit
RAHEEM HANKERSON	:	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. 922(j) (possession of stolen
	:	firearm - 1 count)
	:	18 U.S.C. 922(g)(1)
	:	(convicted felon in possession of firearm
	:	- 2 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. A.I. Poland Jewelers ("Poland Jewelers"), located at 4347 Main Street in Philadelphia, Pennsylvania, was a business engaged in interstate commerce, selling jewelry and decorative items 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. On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

ANTHONY BURNETT
a/k/a "Ant," and
RAHEEM HANKERSON

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 HANKERSON and BURNETT conspired to unlawfully take and obtain jewelry, money and other things of value from Poland Jewelers and from its employees 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:

3. Defendants RAHEEM HANKERSON and ANTHONY BURNETT planned to rob Poland Jewelers at gunpoint.

4. Defendant RAHEEM HANKERSON obtained a car for use during the robbery.

5. Defendant ANTHONY BURNETT obtained a gun for use in the robbery.

6. Defendants RAHEEM HANKERSON and ANTHONY BURNETT used wigs as disguises, used defendant BURNETT's gun to intimidate and overcome their victims, and restrained their victims by binding them with plastic zip ties.

OVERT ACTS

In furtherance of this conspiracy and to accomplish its object, in the Eastern District of Pennsylvania, defendants RAHEEM HANKERSON and ANTHONY BURNETT committed the following overt acts, among others, on or about March 29, 2011:

1. Defendant RAHEEM HANKERSON borrowed the car of Person # 1, known to the grand jury, for use in the robbery.
2. Defendant ANTHONY BURNETT supplied a 9mm pistol for use in the robbery.
3. Defendant ANTHONY BURNETT entered the A.I. Poland Jewelers armed with a 9mm pistol.
4. Defendant RAHEEM HANKERSON waited outside.
5. Once inside, Defendant ANTHONY BURNETT subdued the store's owner and another employee at gunpoint.
6. Defendant ANTHONY BURNETT bound both victims with plastic zip ties.
7. Defendant ANTHONY BURNETT used a cellphone to call defendant RAHEEM HANKERSON into the store.
8. Defendant RAHEEM HANKERSON entered the store.
9. Defendants RAHEEM HANKERSON and ANTHONY BURNETT then ransacked the store, taking several bags of jewelry, wallets belonging to both victims, and a .38 caliber revolver.

10. During the robbery, defendant ANTHONY BURNETT hit the store owner in the head with the 9mm pistol, opening a gash that later required seven surgical staples to repair.

11. Defendants RAHEEM HANKERSON and ANTHONY BURNETT then ran from the store and, with defendant HANKERSON driving, fled the scene in the car that defendant HANKERSON had borrowed from Person #1.

12. Defendant RAHEEM HANKERSON drove the car approximately one mile from the scene of the robbery, then pulled over on Kalos Street, in Philadelphia.

13. Defendants RAHEEM HANKERSON and ANTHONY BURNETT threw proceeds of the robbery into the trunk of the car.

14. Defendant RAHEEM HANKERSON asked a bystander, Person #2 known to the grand jury, to give him (defendant HANKERSON) and defendant ANTHONY BURNETT a ride away from the area. The bystander declined.

15. Defendants ANTHONY BURNETT and RAHEEM HANKERSON then ran from the area on foot.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 6, and Overt Acts 1 through 15 of Count One of this indictment are incorporated here.
2. On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY BURNETT
a/k/a "Ant," and
RAHEEM HANKERSON**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants HANKERSON and BURNETT unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and other things of value, that is, jewelry valued at approximately \$100,000, and a Charter Arms "Undercover" .38 caliber revolver, serial number 97519 from A. I. Poland Jewelers, located at 4347 Main Street in Philadelphia, Pennsylvania, 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, by brandishing a firearm at the owner and an employee, forcing the owner and employee onto the floor, restraining them with plastic zip ties, and hitting the owner in the head with the firearm.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY BURNETT
a/k/a "Ant," and
RAHEEM HANKERSON**

used and carried, and aided and abetted the use and carrying of, a firearm, that is, an EAA Witness 9mm semi-automatic handgun, serial number EA10579, loaded with 13 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.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTHONY BURNETT
a/k/a "Ant," and
RAHEEM HANKERSON**

knowingly possessed, and aided and abetted the possession of, a stolen firearm, that is, a Charter Arms "Undercover" .38 caliber revolver, serial number 97519, which had been shipped and transported in interstate commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2011, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAHEEM HANKERSON,

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 and foreign commerce a firearm, that is, a Charter Arms "Undercover" .38 caliber revolver, serial number 97519.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY BURNETT,
a/k/a "Ant,"**

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 and foreign commerce firearms, that is, a Charter Arms "Undercover" .38 caliber revolver, serial number 97519, and an EAA Witness 9mm handgun, serial number EA10579.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(e).

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), set forth in this indictment, defendants

**ANTHONY BURNETT
a/k/a "Ant," and
RAHEEM HANKERSON**

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

One EAA Witness 9mm handgun, serial number EA10579, and 13 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