

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> <u>11-_____</u>
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>KEYNAN ROBINSON,</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1951 (conspiracy to commit</b>
	:	<b>robbery which interferes with interstate</b>
	:	<b>commerce - 1 count)</b>
	:	<b>18 U.S.C. § 1951 (robbery which</b>
	:	<b>interferes with interstate commerce</b>
	:	<b>- 5 counts)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The following businesses were engaged in interstate commerce, in that they sold items transported from outside of the Commonwealth of Pennsylvania, through the channels of interstate commerce, or otherwise conducted business in interstate commerce:

- a. AT&T store, located at 117 South 69th Street, Upper Darby, Pennsylvania;
- b. AT&T store, located at 37 East City Line Avenue, Bala Cynwyd, Pennsylvania;
- c. AT&T store, located at 3741 Walnut Street, Philadelphia, Pennsylvania;
- d. AT&T store, located at 1105 South 18th Street, Philadelphia, Pennsylvania.

## THE ROBBERY CONSPIRACY

2. From on or about March 21, 2011, through on or about April 9, 2011,

defendant

**KEYNAN ROBINSON,**

conspired and agreed, with Person #1, known to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendant ROBINSON, along with Person #1, conspired to unlawfully take and obtain property, including money and other items of value, from the person and presence of employees of the businesses set forth in paragraph 1 above, 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:

3. Defendant KEYNAN ROBINSON and Person #1 planned to rob the businesses set forth in paragraph 1 above.

4. Defendant KEYNAN ROBINSON and Person #1 drove together to the businesses.

5. Defendant KEYNAN ROBINSON then entered each of the businesses as Person #1 remained outside in the getaway vehicle.

6. Once inside the businesses, defendant KEYNAN ROBINSON threatened and intimidated the employees inside the businesses by pointing a BB gun at them, demanding

money and other items of value.

7. Defendant KEYNAN ROBINSON and Person #1 stole cash and other items of value and fled.

### **OVERT ACTS**

In furtherance of this conspiracy, in the Eastern District of Pennsylvania, defendant KEYNAN ROBINSON, and Person #1 committed the following overt acts, among others, from on or about March 21, 2011, through on or about April 9, 2011:

1. On or about March 21, 2011:

a. defendant KEYNAN ROBINSON and Person #1 drove together to the AT&T store, located at 117 South 69th Street, Upper Darby, PA.

b. As Person #1 remained outside in a getaway vehicle, defendant KEYNAN ROBINSON entered the business, pointed a BB gun at the employees, forced the employees to the back of the store, and directed them to fill his bag with cash, ipads and NetBooks.

c. Defendant KEYNAN ROBINSON left the store with the stolen cash and electronic items and entered the waiting getaway vehicle in which he and Person #1 fled.

2. On or about March 28, 2011:

a. Defendant KEYNAN ROBINSON and Person #1 drove together to the AT&T store, located at 37 East City Line Avenue, Bala Cynwyd, PA.

b. Defendant KEYNAN ROBINSON entered the business as Person #1 remained outside in a getaway vehicle.

c. Defendant KEYNAN ROBINSON attempted to grab an employee and force the employee to turn over cash and merchandise.

d. defendant KEYNAN ROBINSON fled from the store and entered the waiting getaway vehicle, in which he and Person #1 fled.

3. On or about March 28, 2011:

a. Defendant KEYNAN ROBINSON and Person #1 drove together to the AT&T store, located at 3741 Walnut Street, Philadelphia, PA.

b. As Person #1 remained outside in a getaway vehicle, defendant KEYNAN ROBINSON entered the business, pointed a BB gun at the employees, forced the employees to the back of the store, and directed them to fill his bag with cash, ipads and iphones.

c. Defendant KEYNAN ROBINSON then forced the employees into a storage room, left the store, with the stolen cash and electronic items and entered the waiting getaway vehicle along with Person #1.

4. On or about April 7, 2011:

a. Defendant KEYNAN ROBINSON and Person #1 drove together to the AT&T store located at 1105 South 18th Street Philadelphia, PA.

b. As Person #1 remained outside in a getaway vehicle, defendant KEYNAN ROBINSON entered the business, pointed a BB gun at the employees, forced the employees to the back of the store, and directed them to fill his bag with cash, ipads and iphones.

c. Defendant KEYNAN ROBINSON then left the store with stolen cash and entered the waiting getaway vehicle, in which he and Person #1 fled.

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

## COUNT TWO

### THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 7, and Overt Acts 1 (a) through (c) of Count One of this indictment are incorporated here.
2. On or about March 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

### KEYNAN ROBINSON

and Person #1, known to the grand jury, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant ROBINSON and Person #1 unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash and merchandise from the person or in the presence of employees of the AT&T store, located at 117 South 69<sup>th</sup> 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, that is, by brandishing a BB gun at the employees, forcing the employees to the back of the store, demanding money and other items, and taking money and other items.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7, and Overt Acts 2 (a) through (d) of Count One of this indictment are incorporated here.
2. On or about March 28, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEYNAN ROBINSON**

and Person #1, known to the grand jury, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant ROBINSON and Person #1 unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash and merchandise from the person and in the presence of employees of the AT&T store, located at 37 East City Line Avenue, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by brandishing a BB gun at the employees, forcing the employees to the back of the store, demanding money and other items, and taking money and other items.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7, and Overt Acts 3 (a) through (c) of Count One of this indictment are incorporated here.
2. On or about March 28, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEYNAN ROBINSON**

and Person #1, known to the grand jury, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant ROBINSON and Person #1 unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash and merchandise from the person and in the presence of employees of the AT&T store, located at 3741 Walnut 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, that is, by brandishing a BB gun at the employees, forcing the employees to the back of the store, demanding money and other items, and taking money and other items.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7, and Overt Acts 4 (a) through (c) of Count One of this indictment are incorporated here.
2. On or about April 7, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEYNAN ROBINSON**

and Person #1, known to the grand jury, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant ROBINSON and Person #1 unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash and merchandise from the person and in the presence of employees of the AT&T store, located at 1105 South 18<sup>th</sup> 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, that is, by brandishing a BB gun at the employees, forcing the employees to the back of the store, demanding money and other items, and taking money and other items.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times relevant to this indictment:

1. United Check Cashing store, located at 1618 West Baltimore Avenue, Lansdowne, Pennsylvania was a business engaged in, and affecting, interstate commerce, by conducting interstate wire transfers of United States currency for a service fee and by providing for sale items transferred from outside of the Commonwealth of Pennsylvania.

2. On or about April 9, 2011, in Lansdowne, in the Eastern District of Pennsylvania, defendant

**KEYNAN ROBINSON**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant ROBINSON unlawfully attempted to take and obtain cash and merchandise from the person and in the presence of employees of the United Check Cashing store, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is by brandishing a BB gun at the employees, forcing the employees to the back of the store,

and demanding money and other items.

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

**A TRUE BILL:**

GRAND JURY FOREPERSON

  
ZANE DAVID MEMEGER  
United States Attorney