

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** 11-_____
v. : **DATE FILED:** _____
JERRELL ROBINSON : **VIOLATIONS:**
: **18 U.S.C. § 1951 (robbery which**
: **interferes with interstate commerce**
: **- 1 count)**
: **18 U.S.C. § 924(c)(1) (carrying and using**
: **a firearm during and in relation to a**
: **crime of violence - 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 11, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JERRELL 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 PCMR 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 firearm at an employee, forcing the employee into the store, and demanding money and other items.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JERRELL ROBINSON

used and carried a firearm, that is, a Smith & Wesson, 9mm semiautomatic pistol, bearing serial number EKZ4969, loaded with six 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, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c)(1), set forth in this indictment, defendant

JERRELL ROBINSON

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 Smith & Wesson, 9mm semiautomatic pistol, bearing serial number EKZ4969, loaded with six 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 MEMEGER
United States Attorney