

and abetted the unlawful taking and obtaining of, property and cash from Belaggio Jewelers located at 2115 Cottman Avenue, in Philadelphia, in the presence of employees of the Belaggio Jewelers and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and their property, by pointing a firearm at, demanding money from, and otherwise threatening them.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFERY HARRISON

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, black in color, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interfered 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)(1) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Radio Shack, a store located at 7723 Crittenden Street, Philadelphia, Pennsylvania (Radio Shack #1), was a business engaged in interstate commerce, selling electronics, telephones, computers, and other general merchandise, produced in and transported from other states to Pennsylvania, to residents of the Commonwealth of Pennsylvania and out-of-state residents.

2. On or about December 26, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFERY HARRISON

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant HARRISON unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property from Radio Shack #1, located at 7723 Crittenden Street, in Philadelphia, in the presence of employees of Radio Shack #1 and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their persons and their property, by pointing a firearm at, demanding money and property from, and otherwise threatening them.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 26, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFERY HARRISON

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, black in color, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interfered 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)(1) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Radio Shack, a store located at 101 E. Olney Avenue, Philadelphia, Pennsylvania (Radio Shack #2), was a business engaged in interstate commerce, selling electronics, telephones, computers, and other general merchandise, produced in and transported from other states to Pennsylvania, to residents of the Commonwealth of Pennsylvania and out-of-state residents. located at 101 E. Olney Avenue, in Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about December 28, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFERY HARRISON

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant HARRISON unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash from the Radio Shack #2, located at 101 Olney Avenue, in Philadelphia, in the presence of employees of Radio Shack and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their persons and their property, by pointing a firearm at, demanding money from, and otherwise threatening them.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFERY HARRISON

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, black in color, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interfered 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)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney