



against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a firearm at an employee, forcing the employee into the store, and demanding money, and stealing approximately \$1,500.

In violation of Title 18, United States Code, Section 1951.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The CVS store, located at 3780 Main Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce, in that it sold items transported from outside of the Commonwealth of Pennsylvania through the channels of interstate commerce, and otherwise conducted business in interstate commerce.

2. On or about December 25, 2010, 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 took and obtained cash from the person and in the presence of an employee of the CVS store, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a firearm at an employee, forcing the employee into the store, and demanding money, and stealing approximately \$6,513.

In violation of Title 18, United States Code, Section 1951.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The Rite Aid store, located at 5440 Lansdowne Avenue, Lansdowne, Pennsylvania, was a business engaged in interstate commerce, in that it sold items transported from outside of the Commonwealth of Pennsylvania through the channels of interstate commerce, and otherwise conducted business in interstate commerce.

2. On or about February 3, 2011, in Lansdowne, 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 took and obtained cash from the person and in the presence of an employee of the Rite Aid store, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, by brandishing a firearm at an employee, forcing the employee into the store, and demanding money, and stealing approximately \$1,200.

In violation of Title 18, United States Code, Section 1951.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The St. Albans Check Cashing store, located at 756 S. 22<sup>nd</sup> Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce, in that it sold items transported from outside of the Commonwealth of Pennsylvania through the channels of interstate commerce, and offered services and otherwise conducted business in interstate commerce.

2. On or about May 21, 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 took and obtained cash and other items from the person and in the presence of an employee of the St. Albans Check Cashing store, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, by brandishing a firearm at an employee, forcing the employee into the store, striking the employee in the head, punching him to the floor, fracturing his elbow, and Tasing him, and demanding money, and stealing approximately \$6,000 cash, approximately \$4,000 in checks, and a firearm, that is a Smith & Wesson, 9mm semiautomatic pistol, bearing serial number EKZ4969, loaded with six rounds of ammunition.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 21, 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, 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).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The PCMR Check Cashing store, located at 702 McDade Boulevard, Collingdale, Pennsylvania, was a business engaged in interstate commerce, in that it sold items transported from outside of the Commonwealth of Pennsylvania through the channels of interstate commerce, and offered services and otherwise conducted business in interstate commerce.

2. On or about August 11, 2011, in Collingdale, 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 attempted to unlawfully take and obtain cash from the person and in the presence of an employee of the PCMR Check Cashing store, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, by brandishing a firearm at an employee, forcing the employee into the store, and demanding money.

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2011, in Collingdale, 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).

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**JERRELL ROBINSON**

knowingly possessed a stolen firearm, that is, a Smith & Wesson, 9mm semiautomatic pistol, bearing serial number EKZ4969, loaded with six rounds of ammunition, 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, Section 922(j).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(j), set forth in this superseding indictment, defendant

**JERRELL ROBINSON**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of these offenses, 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**