

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: <u>December 10, 2015</u>
JACOB PABON	:	VIOLATIONS:
LYTIC FAUNTLEROY,	:	18 U.S.C. § 1951(a) (robbery
a/k/a "Tiki"	:	which interferes with interstate
	:	commerce - 2 counts)
	:	18 U.S.C. § 924(c)(1) (using and
	:	carrying a firearm during a
	:	crime of violence – 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Sun Deli, a convenience store located at 1341 Union Street, Allentown, Pennsylvania, was a business engaged in and affecting interstate commerce by sourcing products sold in its store from New York and New Jersey to Pennsylvania.

2. On or about May 7, 2015, in Allentown, in the Eastern District of Pennsylvania, defendant

JACOB PABON

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant JACOB PABON, and two other persons known to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is U.S. currency valued at approximately \$1,500

and other items, from Sun Deli located at 1341 Union Street, in Allentown, and from customers of Sun Deli, in the presence of employees and customers of Sun Deli and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees and customers of Sun Deli, by brandishing and using firearms to threaten and control the victims to steal cash and other things of value from them.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about May 7, 2015, in Allentown, in the Eastern District of Pennsylvania, defendant

JACOB PABON

and persons known to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, as charged in Count One of this indictment, and brandished, and aided and abetted the brandishing of, these firearms.

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 relevant to this indictment:

1. Speedway, a gas station and convenience store located at 1043-45 Lehigh Street, Allentown, Pennsylvania, was a business engaged in and affecting interstate commerce by sourcing products sold in its store from New Jersey to Pennsylvania.

2. On or about May 29, 2015, in Allentown, in the Eastern District of Pennsylvania, defendants

**JACOB PABON and
LYTIC FAUNTLEROY,
a/k/a "Tiki,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants JACOB PABON and LYTIC FAUNTLEROY, and another person known to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is U.S. currency valued at approximately \$100, from Speedway located at 1043-45 Lehigh Street, in Allentown, and from a customer of Speedway, in the presence of an employee and customers of Speedway and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee and customers of Speedway, by brandishing and using firearms to threaten and control the victims to steal cash from them.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about May 29, 2015, in Allentown, in the Eastern District of Pennsylvania, defendants


**JACOB PABON and
LYTIC FAUNTLEROY,
a/k/a "Tiki,"**

and a person known to the grand jury knowingly used and carried, and aided and abetted the use and carrying of, firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, as charged in Count Three of this indictment, and brandished, and aided and abetted the brandishing of, these firearms.

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

JFL

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

INDICTMENT

15-592

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendants See reverse

County: Lehigh County

Register number: _____

Place of accident, incident, or transaction:

Eastern District of Pennsylvania

Post Office: Philadelphia

County: Philadelphia

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: YES

15-591-JFL

U.S. v. Victor Morales – Indictment is being returned simultaneously

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1. ☐ Antitrust
2. ☐ Income Tax and other Tax Prosecutions
3. ☐ Commercial Mail Fraud
4. ☐ Controlled Substances
5. ☐ Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6. ☒ General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

18 U.S.C. § 1951(a) (robbery which interferes with interstate commerce - 2 counts)

18 U.S.C. § 924(c)(1) (using and carrying a firearm during a crime of violence – 2 counts)

18 U.S.C. § 2 (aiding and abetting)

DATE: December 10, 2015


ERIC A. BODEN

Assistant United States Attorney

Address of Defendant Pabon:	Unknown
Register Number:	180424

Address of Fauntleroy:	Unknown
Register Number:	174983