

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

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

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, ACE Cash Express was a check cashing business engaged in and affecting interstate commerce which is headquartered at 1231 Greenway Drive, Suite 600, Irving, Texas. ACE Cash Express has check cashing stores at locations across the United States including but not limited to 3544 Germantown Avenue, Philadelphia, Pennsylvania. The ACE Cash Express located at 3544 Germantown Avenue in Philadelphia cashes checks for customers including checks written on accounts held in states outside the Commonwealth of Pennsylvania.

2. On or about May 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMAL CHARLES**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant CHARLES unlawfully attempted to take and obtain property, that is, money, from an employee of ACE Cash Express, located at 3544 Germantown Avenue, Philadelphia, Pennsylvania, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property, that is, by using and brandishing a handgun at the ACE Cash Express employee and ordering the employee at gunpoint to open the safe.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**JAMAL CHARLES**

knowingly used and carried a firearm, that is, a Makarov 9 mm pistol, serial number A016284, loaded with five live 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(a), as charged in Count One of this indictment, and brandished that firearm.

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), set forth in this indictment, defendant

**JAMAL CHARLES**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to, a Makarov 9 mm pistol, serial number A016284, loaded with five live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
United States Attorney