

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>ANTHONY ROBINSON</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (robbery which interferes with interstate commerce - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C § 924(c) (using and carrying a firearm during and in relation to a crime of violence - 2 counts)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The Subway restaurant, located at 545 North Broad Street in Philadelphia, Pennsylvania (“Subway”), was a business engaged in and affecting interstate commerce, by providing to customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 1, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY ROBINSON**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that the defendant ROBINSON unlawfully took and obtained approximately \$100 United States currency, property of Subway, from the person or in the presence of J.H., an employee of Subway known to the grand jury, and against

J.H.'s will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property, that is, by brandishing a handgun and using the handgun to threaten and intimidate the victim J.H.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 1, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY ROBINSON**

knowingly used and carried a firearm, that is, a black handgun, 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, as charged in Count One of this indictment, and brandished that firearm.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. The Anna's Linens store, located at 301 West Cheltenham Avenue, in Philadelphia, Pennsylvania ("Anna's Linens"), was a business engaged in and affecting interstate commerce, by providing to customers bedding and bath, dining, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 1, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTHONY ROBINSON**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that the defendant ROBINSON unlawfully took and obtained approximately \$750 United States currency, property of Anna's Linens, from the person or in the presence of E.L., an employee of Anna's Linens known to the grand jury, and against E.L.'s will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by brandishing a handgun and using the handgun to threaten and intimidate the victim E.L.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 1, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

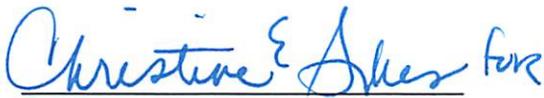
**ANTHONY ROBINSON**

knowingly used and carried a firearm, that is, a black handgun, 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, as charged in Count Three of this indictment, and brandished that firearm.

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

**A TRUE BILL:**

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**FOREPERSON**

  
**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**