

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

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| WILLIAM ROBINSON | : | VIOLATIONS: |
| | : | 18 U.S.C. § 1951(a) (robbery which |
| | : | interferes with interstate commerce |
| | : | - 2 counts) |
| | : | 18 U.S.C. § 924(c) (using and carrying a |
| | : | firearm during a crime of violence - 2 |
| | : | counts) |
| | : | 18 U.S.C. § 922(g)(1) (convicted felon in |
| | : | possession of a firearm – 1 count) |
| | : | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. 7-Eleven, located at 23 West Girard Avenue in Philadelphia, Pennsylvania, was a grocery and convenience store, which affected interstate commerce, and which sold, among other things, sandwiches, hot dogs, beverages, and food supplies, that traveled in interstate commerce.

2. On or about June 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

WILLIAM 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 approximately \$200 cash from an employee of 7-Eleven and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at, demanding money from, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

WILLIAM ROBINSON

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of violence for which the defendant 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(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)(A)(ii).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Pizza Hut, located at 2715 South Front Street in Philadelphia, Pennsylvania, was a pizza shop, which affected interstate commerce, and which sold, among other things, pizzas, beverages, and food products, that traveled in interstate commerce.

2. On or about June 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

WILLIAM 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 approximately \$424 cash from employees of Pizza Hut and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees, that is, by pointing a firearm at the employees, demanding money, and threatening the employees.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

WILLIAM ROBINSON

knowingly used and carried a firearm, that is, a Harrington & Richardson .32 Smith & Wesson caliber revolver, serial number AJ2211, loaded with two live rounds of ammunition, during and in relation to a crime of violence for which the defendant 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(a), as charged in Count Three of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

THE GRAND JURY FUTURE CHARGES THAT:

On or about June 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

WILLIAM ROBINSON,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Harrington & Richardson .32 Smith & Wesson caliber revolver, serial number AJ2211, loaded with two live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

WILLIAM ROBINSON

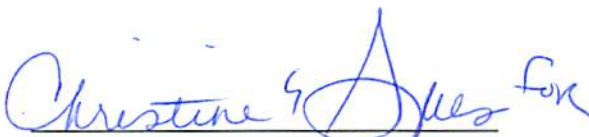
shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

- 1) One Harrington & Richardson .32 Smith & Wesson caliber revolver; serial number AJ2211; and
- 2) two rounds of ammunition.

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

TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney