

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
EDWARD SCHAEFFER	:	VIOLATIONS:
WILLIAM WEBB	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 1951 (robbery which interferes with interstate commerce - 2 counts)
	:	18 U.S.C. § 924(c) (use, carrying, and brandishing a firearm during a crime of violence - 2 counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Rite Aid Pharmacy, 6363 Frankford Avenue, Philadelphia, Pennsylvania (“Rite Aid”), was a business engaged in interstate commerce, providing prescription pharmaceutical drugs, over-the-counter medications, and other products produced in and transported from other states to the Commonwealth of Pennsylvania.
2. The Somerton Pharmacy, 10806 Bustleton Avenue, Philadelphia, Pennsylvania (“Somerton Pharmacy”), was a business engaged in interstate commerce, providing

prescription pharmaceutical drugs, over-the-counter medications, and other products produced in and transported from other states to the Commonwealth of Pennsylvania.

3. The following pharmacies (“other pharmacies”) were businesses engaged in interstate commerce, providing prescription pharmaceutical drugs, over-the-counter medications, and other products produced in and transported from other states to the Commonwealth of Pennsylvania:

- a. QRX Pharmacy, 7063 Castor Avenue, Philadelphia, Pennsylvania;
- b. Holmesburg Pharmacy, 8039 Frankford Avenue, Philadelphia, Pennsylvania;
- c. CVS Pharmacy, 7350 Oxford Avenue, Philadelphia, Pennsylvania;
- d. Circle Pharmacy, 2853 Holmes Avenue, Philadelphia, Pennsylvania;
- e. CVS Pharmacy, 8525 Frankford Avenue, Philadelphia, Pennsylvania;
- f. Rite Aid Pharmacy, 2501 Welsh Road, Philadelphia, Pennsylvania;
- g. Rite Aid Pharmacy, 2503 Welsh Road, Philadelphia, Pennsylvania;
- h. Rite Aid Pharmacy, 8445 Frankford Avenue, Philadelphia, Pennsylvania;
- i. Rite Aid Pharmacy, 7941 Oxford Avenue, Philadelphia, Pennsylvania;
- j. CVS Pharmacy, 7350 Oxford Avenue, Philadelphia, Pennsylvania;
- k. Rite Aid Pharmacy, 327 N. Chester Pike, Glenolden, Pennsylvania;
- l. Rite Aid Pharmacy, 12311 Academy Road, Philadelphia, Pennsylvania;
- m. Rite Aid Pharmacy, 1441 Old York Road, Abington, Pennsylvania;
- n. Stanwood Pharmacy, 8035 Bustleton Avenue, Philadelphia, Pennsylvania;
- o. York Street Pharmacy, 2334 E. York Street, Philadelphia, Pennsylvania;
- P. Fairmount Pharmacy, 1900 Green Street, Philadelphia, Pennsylvania; and

q. Rite Aid Pharmacy, 8130 Roosevelt Boulevard, Philadelphia, Pennsylvania.

4. From on or about December 10, 2011 through on or about November 12, 2012, in Philadelphia and elsewhere, in the Eastern District of Pennsylvania, defendants

**EDWARD SCHAEFFER and
WILLIAM WEBB,**

conspired and agreed together, and with others unknown to the grand jury, to commit robberies, which robberies would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants SCHAEFFER and WEBB conspired to unlawfully take and obtain prescription pharmaceutical drugs and cash from the employees of the Rite Aid, Somerton Pharmacy, and other pharmacies against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, property, and property in their possession, all in violation of Title 18, United States Code, Sections 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

5. Defendants EDWARD SCHAEFFER and WILLIAM WEBB planned to rob pharmacies by using force, threats of force, and use of firearms.

6. Defendants EDWARD SCHAEFFER and WILLIAM WEBB agreed to use a stolen Harrington and Richardson model Sportsman, .22 caliber revolver, serial no. AU017288 (“stolen H&R revolver”) and other weapons, to commit the pharmacy robberies.

7. Defendants EDWARD SCHAEFFER and WILLIAM WEBB agreed that defendant SCHAEFFER would wear gloves and a mask to hide his identity and would enter the

pharmacies, armed with the H&R .22 caliber revolver or another weapon, and obtain narcotics from the pharmacies, including endocet, hydromorphone, meperidine, methadone, oxycodone, oxycontin, and others.

8. Defendants EDWARD SCHAEFFER and WILLIAM WEBB agreed that defendant WEBB would supply and drive a vehicle to the pharmacies, and act as a getaway driver after the robberies were completed.

9. Defendants EDWARD SCHAEFFER and WILLIAM WEBB agreed to use or sell the narcotic drugs and to divide the cash stolen from the pharmacy robberies.

OVERT ACTS

From on or about December 10, 2011 through on or about November 12, 2012, in furtherance of the conspiracy, and to accomplish its object, defendants EDWARD SCHAEFFER and WILLIAM WEBB, and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about December 10, 2011, defendant EDWARD SCHAEFFER and others unknown to the grand jury robbed the QRX Pharmacy, 7063 Castor Avenue, Philadelphia, Pennsylvania.

2. On or about December 22, 2011, defendant EDWARD SCHAEFFER and others unknown to the grand jury robbed the Holmesburg Pharmacy, 8039 Frankford Avenue, Philadelphia, Pennsylvania.

3. On or about January 8, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the CVS Pharmacy, 7350 Oxford Avenue, Philadelphia, Pennsylvania.

4. On or about January 25, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Circle Pharmacy, 2853 Holmes Avenue, Philadelphia, Pennsylvania.

5. On or about February 26, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the CVS Pharmacy, 8525 Frankford Avenue, Philadelphia, Pennsylvania.

6. On or about May 14, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 2501 Welsh Road, Philadelphia, Pennsylvania.

7. On or about May 21, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 2503 Welsh Road, Philadelphia, Pennsylvania.

Rite Aid Pharmacy Robbery on June 11, 2012

On or about June 11, 2012:

8. Defendant WILLIAM WEBB drove defendant EDWARD SCHAEFFER to the Rite Aid in defendant WEBB's black Chevrolet Trailblazer, PA registration FHP-9929 ("Trailblazer").

9. Wearing gloves and a mask, defendant EDWARD SCHAEFFER entered the Rite Aid and brandished the stolen H&R revolver. Once inside, defendant SCHAEFFER demanded drugs from the pharmacy.

10. Defendant EDWARD SCHAEFFER fled the pharmacy with prescription pharmaceutical drugs, including oxycodone and suboxone, in the Trailblazer driven by defendant WILLIAM WEBB.

11. On or about June 23, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 8445 Frankford Avenue, Philadelphia, Pennsylvania.

12. On or about July 4, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 7941 Oxford Avenue, Philadelphia, Pennsylvania.

13. On or about August 6, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the CVS Pharmacy, 7350 Oxford Avenue, Philadelphia, Pennsylvania.

14. On or about September 4, 2012, defendant EDWARD SCHAEFFER and others unknown to the grand jury robbed the Rite Aid Pharmacy, 327 Chester Pike, Glenolden, Pennsylvania.

15. On or about September 29, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 12311 Academy Road, Philadelphia, Pennsylvania.

16. On or about October 16, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 1441 Old York Road, Abington, Pennsylvania.

17. On or about October 17, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Stanwood Pharmacy, 8035 Bustleton Avenue, Philadelphia, Pennsylvania.

Somerton Pharmacy Robbery on October 25, 2012

On or about October 25, 2012:

18. On or about October 25, 2012, defendant WILLIAM WEBB drove EDWARD SCHAEFFER to the Somerton Pharmacy in a black Jeep Cherokee, PA registration FMN-8656 ("Jeep").

19. Defendant WILLIAM WEBB entered the Somerton Pharmacy prior to the robbery and spoke to an employee.

20. Defendant WEBB cased the Somerton Pharmacy by observing the number of employees who were working, the lay out of the pharmacy, and the number of surveillance cameras inside the business.

21. A few minutes after defendant WILLIAM WEBB walked out of the pharmacy, defendant EDWARD SCHAEFFER, who wore gloves and a mask, entered the Somerton Pharmacy and brandished the stolen H&R revolver. Defendant SCHAEFFER demanded drugs from the pharmacy and cash.

22. Defendant EDWARD SCHAEFFER fled the pharmacy with prescription pharmaceutical drugs, including hydromorphone, oxycodone, oxycontin, and endocet, and approximately \$250 in United States currency, in the Jeep driven by defendant WILLIAM WEBB.

23. On or about October 30, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the York Street Pharmacy, 2334 E. York Street, Philadelphia, Pennsylvania.

24. On or about November 7, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Fairmount Pharmacy, 1900 Green Street, Philadelphia, Pennsylvania.

25. On or about November 12, 2012, defendants EDWARD SCHAEFFER and WILLIAM WEBB robbed the Rite Aid Pharmacy, 8130 Roosevelt Boulevard, Philadelphia, Pennsylvania.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 5-9 of Count One and Overt Acts 8-10 of Count One are incorporated here.
2. On or about June 11, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EDWARD SCHAEFFER and
WILLIAM WEBB**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants SCHAEFFER and WEBB unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, prescription pharmaceutical drugs from the Rite Aid, in the presence of employees of the Rite Aid, and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the owners and employees, that is, by brandishing a gun and otherwise threatening the employees.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 11, 2012, in the Eastern District of Pennsylvania, defendants

**EDWARD SCHAEFFER and
WILLIAM WEBB**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm that is, a Harrington and Richardson, model Sportsman, .22 caliber revolver, serial no. AU017288, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit robbery which interferes with commerce, and robbery which interferes with commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and brandished, and aided and abetted the brandishing of, that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 and 5-9 of Count One and Overt Acts 18-22 are incorporated here.
2. On or about October 25, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EDWARD SCHAEFFER and
WILLIAM WEBB**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants SCHAEFFER and WEBB unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, prescription pharmaceutical drugs and United States currency from the Somerton Pharmacy, in the presence of employees of the Somerton Pharmacy, and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the owners and employees, that is, by brandishing a gun and otherwise threatening the employees.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**EDWARD SCHAEFFER and
WILLIAM WEBB**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm that is, a Harrington and Richardson, model Sportsman, .22 caliber revolver, serial no. AU017288, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit robbery which interferes with commerce, and robbery which interferes with commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and brandished, and aided and abetted the brandishing of, that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(c), set forth in this Indictment, defendants

**EDWARD SCHAEFFER and
WILLIAM WEBB**

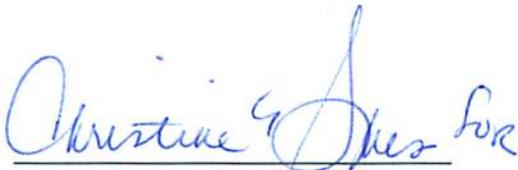
shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

a. one Harrington and Richardson, model Sportsman, .22 caliber revolver, serial no. AU017288.

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

A TRUE BILL:

GRAND JURY FOREPERSON


**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**