

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-30
v.	:	DATE FILED:
TYREEK STYLES, a/k/a "Reek"	:	VIOLATIONS:
TYRONE STYLES, a/k/a "Rome"	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce - 1 count)
JERAMIAH STOKES, a/k/a "Jerm"	:	18 U.S.C. § 1951 (robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 924(c) (use, carrying and discharging of a firearm during and in relation to a crime of violence - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The Secane Deli and Grill, 620 South Avenue, Upper Darby, Pennsylvania ("Secane Deli & Grill"), was a business engaged in interstate commerce, providing food, beverages, cigarettes, and packaged goods produced in, and transported from, other states to the Commonwealth of Pennsylvania.

2. T.D., an individual known to the grand jury, owned the Secane Deli & Grill, and T.D.'s family members also worked at the business as employees.

3. On or about December 3, 2011, in the Eastern District of Pennsylvania, defendants

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TYRONE STYLES, and
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conspired and agreed together, and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendants TYREEK STYLES, TYRONE STYLES, and JERAMIAH STOKES conspired to unlawfully take and obtain cash and other items of value from the owner and employees of the Secane Deli & Grill, 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:

4. Defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators, known to the grand jury, planned to rob the owners of the Secane Deli & Grill by using force, threats of force, and firearms.

5. Prior to December 3, 2011, defendants TYREEK STYLES, JERAMIAH STOKES and two co-conspirators conducted surveillance on the owners of the Secane Deli & Grill and followed them to their house in preparation of the robbery.

6. Defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators obtained a Ruger revolver, serial no. 57036175 (“stolen Ruger”), to commit the robbery. Defendant JERAMIAH STOKES stole the Ruger.

7. Defendant TYREEK STYLES used his car, a gold Chevrolet Malibu LS, Pennsylvania registration no. HVL4356, to drive himself, defendants TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators to the home of the owner of the Secane Deli & Grill in order to commit the robbery.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and others known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 3, 2011, defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators assaulted T.D., owner of the Secane Deli & Grill, outside of his home on the 100 block of Springton Road, Upper Darby, Pennsylvania.

2. On or about December 3, 2011, defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators entered T.D.'s home at gunpoint and forced T.D.'s family to give them money.

3. On or about December 3, 2011, defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators stole money, some of which was proceeds of T.D.'s business, the Secane Deli & Grill, and other things of value from T.D. and his family members by force using at least one gun, the stolen Ruger.

4. On or about December 3, 2011, defendants TYREEK STYLES, TYRONE STYLES, JERAMIAH STOKES, and two co-conspirators fled from T.D.'s home, and defendant TYRONE STYLES turned and fired one round from the stolen Ruger.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all time relevant to the indictment, the Secane Deli and Grill, 620 South Avenue, Upper Darby, Pennsylvania ("Secane Deli & Grill"), was a business engaged in interstate commerce, providing food, beverages, cigarettes, and packaged goods produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about December 3, 2011, in the Eastern District of Pennsylvania, defendants

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and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants TYREEK STYLES, TYRONE STYLES, and JERAMIAH STOKES unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, United States currency from the Secane Deli & Grill, in the presence of the owner and employees of Secane Deli & Grill, 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 and discharging a gun at, and otherwise threatening the owner and 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 December 3, 2011, in the Eastern District of Pennsylvania,
defendants

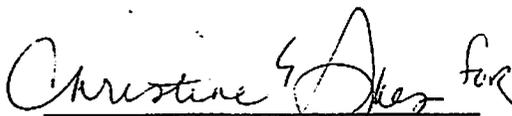
**TYREEK STYLES,
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knowingly used and carried, and aided and abetted the use and carrying of, a firearm that is, a Ruger revolver, serial no. 57036175, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit robbery which interferes with interstate commerce, and robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and brandished and discharged that firearm.

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**